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**RECORDS MANAGEMENT OVERSIGHT ACTIVITIES  
OCTOBER 1, 2019 THROUGH MAY 31, 2020**

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*Semi-Annual Report*

National Archives and Records Administration  
August 2020

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# SEMI-ANNUAL REPORT OF RECORDS MANAGEMENT OVERSIGHT ACTIVITIES OCTOBER 1, 2019 THROUGH MAY 31, 2020

## INTRODUCTION

This report shares recurring themes, key observations, and recommendations for action identified by the Records Management Oversight and Reporting program of the Office of the Chief Records Officer through various oversight activities completed in the first half of FY 2020. We conduct oversight through inspections, assessments, systems audits, and annual reports submitted by federal agencies. As a part of its oversight role, NARA is also responsible for tracking allegations and instances of unauthorized disposition of federal records. For this reporting period our oversight activities resulted in 81 findings with 138 recommendations for 32 total agencies.

Inspections of agency records management (RM) programs, including inspections of specific categories of records, completed during this period included:

### Individual Agency Inspections:

- Department of the Air Force
- Department of Education
- Department of State
- Department of Defense/Defense Information Systems Agency
- Department of Defense/Joint Staff and Combatant Commands

### Multi Agency Inspections:

- Managing Permanent Records
- Disaster Response and Recovery Records
- Research and Development Records

For further information on each of the above reports, along with all other previously issued agency inspection and assessment reports, please see our website located at <https://www.archives.gov/records-mgmt/resources/inspections.html>.

## TRENDS

The data from NARA's oversight activities indicate that records management programs across the federal government have much in common in terms of compliance with federal records management statutes and regulations. In reviewing the data, we found common challenges, best practices, and some noteworthy observations.

The main finding for all of our inspections has been the lack of records management fundamentals implemented by agency records management programs. As identified in Figure 1,

records management fundamentals include a variety of activities that are governed by 36 CFR Chapter XII, Subpart B, including the creation of directives, retention schedules, policies, guidance, and training programs. Additional requirements from the Office of Management and Budget (OMB) Circular A-130 include program support and resources specifically for records management. OMB Circular A-123 requires strategic planning, and risk and performance management for all government programs. Agencies should apply this guidance to their records management program as they would to all other mission critical agency programs. Evaluations and audits of records management programs are also essential for ensuring effective implementation.

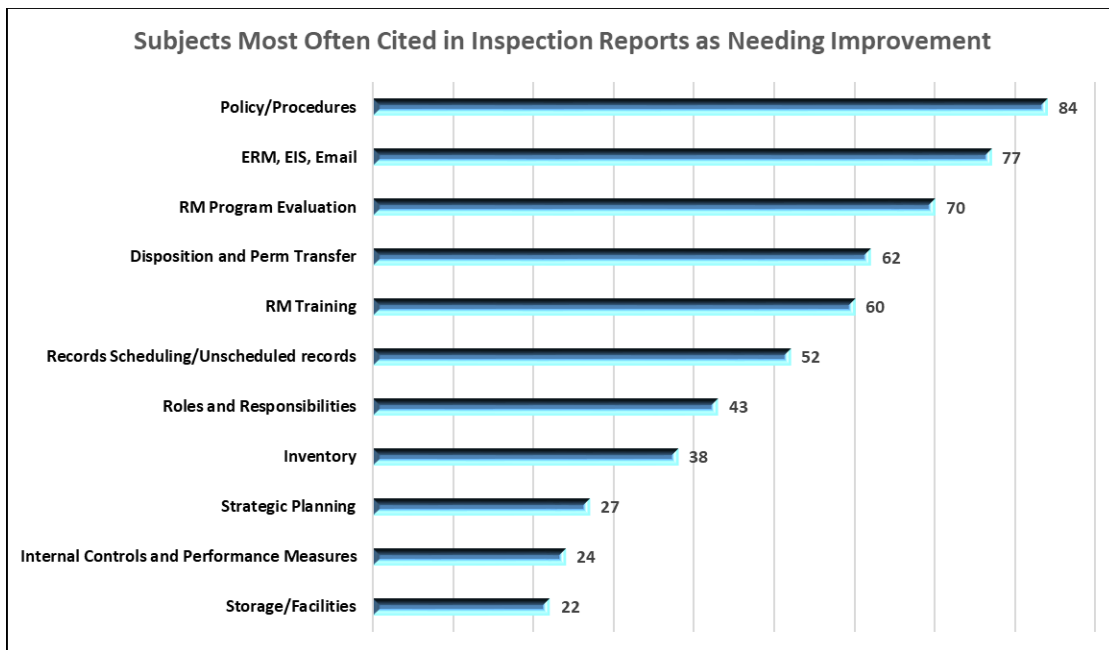


Figure 1: Number of times lack of specific records management fundamentals were cited in inspection reports

The majority of inspections found basic RM fundamentals need improvement. This is critical not just as a regulatory requirement, but also as the foundation for a records management program. They provide management support and direction that enable agencies to enact the legal authority approved by the Archivist of the United States to properly dispose of temporary records and to transfer permanent records to NARA. Other fundamentals that require attention include building retention and recordkeeping requirements into the design of systems to ensure business applications capture and maintain the information needed for transparency, accountability, and decision making. Without these elements, there is a risk that records and information may not be accurate, current, and available when needed. To assist all federal agencies in this area, NARA has issued FAQs, Bulletins, regulations and other guidance and requirements on its [records management website](#).

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## Key Observations and Best Practices

In addition to findings related to RM fundamentals, NARA observed other factors that are affecting proper recordkeeping in agencies. These common themes are listed below, followed by best practices noted at specific agencies.

- The establishment of the Senior Agency Official for Records Management (SAORM) position and subsequent engagement at this level is improving support for records management and is leading to improvement in agency RM programs.
- The transition to fully electronic recordkeeping is moving in a steadily positive direction.
- Electronic records management, including email management, requires more conscious effort to integrate with information governance, stewardship, and information technology to be successful.
- Failure to manage email properly and the use of personal email accounts is one of the most common allegations, and records management risk, reported through the unauthorized disposition case management process.
- Records management is not fully incorporated into agency information technology infrastructure and/or information management plans and processes.
- Plans of Corrective Action (PoCA) created as a result of our inspections are helping to improve the records management programs of inspected agencies; however, some agencies are reporting more progress than others.

The following are a few examples of best practices from inspections completed during this period:

**Department of the Air Force:** The involvement of the agency records officer in the design, development and decommissioning processes for electronic information systems and input into the Information Technology Investment Portfolio Suite (ITIPS) has improved the integration of records management with business applications and systems. ITIPS is used as a registry for systems that tracks them through their lifecycle. This is a practice that could serve as a model for other federal agencies to consider implementing.

### **Joint Staff and Combatant Commands:**

- Northern Command (NORTHCOM) established a Disposition Validation Officer (DVO) assigned to senior personnel with the authority to approve disposals and validate the disposition of temporary records within their directorate. The role is beneficial and effective for complying with the disposition of temporary records in providing ‘checks and balances’ for annual reviews of records eligible for disposition.
- Central Command (CENTCOM) coordinates efforts to obtain and manage war records from U.S. forces deployed in war areas. As part of this effort, CENTCOM hosts an annual War Records Workshop for various DOD entities that advances the records management mission, ensures the accurate and timely documentation, submission, and collection of War Records, and provides a collaborative forum for creating courses of action to resolve guidance concerns.

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**Permanent Records Multiple Agency Inspection:** Federal Communications Commission, General Services Administration, U.S. Agency for Global Media, and U.S. Agency for International Development are all actively cleaning up data and records largely in preparation for moving locations. These operations include physically cleaning up agency space and electronic records storage, inventorying records, boxing up inactive temporary records, and preparing permanent records for transfer to the National Archives. RM staff at these agencies are using these opportunities to provide additional hands-on guidance and instruction.

**Department of State:** The Department provides required RM training for all employees, additional role-based training, and guidance to the Department's offices, bureaus, and posts. State employs a variety of controls that enhance the management of records and information and the creation of electronic information systems. For example, State controls how information is managed and has limited the amount of ad hoc systems developed by individual offices, and has established strong and effective communication channels whereby policies, directives, and records management practices and initiatives are developed, shared, and organized to implement a successful records management program.

**Research and Development Records:** Agencies who create and maintain R&D records manage the data effectively through established governance policies that comply with federal government data management regulations and standards. Records management in terms of creation, maintenance, and preservation is to some extent intertwined and embedded into R&D project management through common procedural phase-based project methodologies and meeting general project requirements and best practices.

## **Recommendations for Executive Action**

Proper records management supports government accountability and allows agencies to create and retrieve information required in order to accomplish mission goals. NARA is committed to working with federal agencies to improve records management across the government to advance these important goals.

NARA makes the following recommendations for Senior Agency Officials for Records Management (SAORM):

- Provide leadership for records management programs and ensure these programs are properly resourced and aligned with the agency's strategic Information Resource Management Plans (or equivalent).
- Increase the level of support for agency records management programs by:
  - Promoting records management as an asset to an agency's mission by ensuring the most current, relevant, and timely information is available when needed.
  - Ensuring records management staff have the authority to carry out their roles by policy, recognition, and instruction.
  - Ensuring the records management program has the financial, technological, and staffing resources to carry out the program's mission, objectives, and goals; and
  - Meeting regularly with the Department or Agency Records Officers.

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- Lead a conscious and deliberate effort to integrate electronic records management with information governance, stewardship, and information technology including fully incorporating records management into the information technology and/or information management plans and processes.
  - Promote an information governance framework that requires collaborative relationships between records management staff and information technology staff to better integrate records management into the agency's information resource management strategy.

NARA makes the following recommendations for Agency Records Officers and others responsible for implementing agency records management programs:

- Update draft directives, retention schedules, policies and guidance, and training programs.
- Review and update records management strategic plans, performance measures, and internal controls, and ensure their proper implementation.
- Schedule all records in accordance with 36 CFR 1225.
- Conduct routine evaluations, assessments, and audits of the implementation of records management programs, and document findings and recommendations in a written report.
- Improve efforts to transfer eligible permanent records to NARA, regardless of format, and particularly paper records before December 2022.
- Evaluate the ability to transfer permanent electronic records and work with NARA as needed to execute these transfers.
- To ensure compliance, issue policies and procedures, and train staff on the retention of records created through electronic communications including text messages, chat, and other messaging platforms or applications, such as social media.

The following is a list of what NARA is committed to doing to facilitate improvements in records management across the federal government.

- Provide reasonable and independent assurance that agencies are complying with relevant laws and regulations.
- Continue its efforts to provide policy and guidance for electronic records management, information stewardship, and governance.
- Enhance its support of federal agency records management officials with effective policies, modern tools, and new services to support the transition to electronic records.
- Establish clear policy on digitizing permanent records and the appropriate disposition of analog originals.
- Identify and share best practices that promote coordination and cooperation between agencies and Agency Records Officers as a way to improve their records management programs.

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## **CONCLUSION**

In an effort to share more broadly how well agencies are doing in carrying out their records management responsibilities, NARA has established this semi-annual report that summarizes the most recent findings and recommendations, and best practices and achievements of federal agencies' records management programs. This report is also intended to provide information and insight to agencies that have not yet been inspected about the most common challenges and opportunities. We expect that agency SAORMs, other Senior Agency Officials, as well as Agency Records Officers and other Records Managers, will use this information to identify where they may have similar issues and proactively make adjustments.