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**RECORDS MANAGEMENT OVERSIGHT ACTIVITIES
JULY 1, 2023 THROUGH DECEMBER 31, 2023**

Semi-Annual Report

National Archives and Records Administration
February 2024

Records Management Oversight Activities Semi-Annual Report July 1 through December 31, 2023

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 July 1 through December 31, 2023.

We conduct oversight through inspections including tracking plans of corrective actions (PoCAs), assessments on various records management topics, analysis of annual reports submitted by federal agencies, and tracking of unauthorized dispositions allegations.

During this six-month period we completed the following:

- Single Agency Inspections
 - Department of Defense/Department of the Army Records Management Program
 - Department of Transportation/Federal Aviation Administration Records Management Program
- Records Management and Systems Assessments
 - Managing Social Media Records
 - Records Management of Electronic Mail and Calendar Information Systems
- 2022 Federal Agency Records Management Report

Published inspection and assessment reports and correspondence related to allegations of [unauthorized disposition](#) of federal records are posted [on our webpage](#). A list of on-going projects expected to be completed in the first half of CY 2024 is provided at the end of this report.

We also continued our tracking and monitoring of agency Plans of Corrective Action (PoCAs) following completed inspections. As of December 31, 2023, NARA is actively working with agencies on 62 open PoCAs with 671 total recommendations. For the open PoCAs, 208 recommendations have been closed as a result of agency action.

TRENDS

- The most concerning trend is the reported erosion of support for the importance of records management at the senior official and program manager levels.
- Annual reporting data indicates that the transition to electronic recordkeeping is continuing with most agencies expressing confidence that NARA and OMB goals will be met.

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- Annual reporting data indicates SAORMs need to continue to provide more leadership and strategic direction for developing agency electronic records management programs. Agencies, however, have reported that SAORMs have taken positive steps to provide the budgetary resources for permanent electronic records management.
 - Those assigned RM responsibilities as a collateral duty do not have time to carry out those responsibilities.
 - Agencies do not have strategic plans for their records management program, which results in ad hoc problem solving instead of continuous improvements.
 - As use of social media expands, policies, practices, and procedures are not being updated accordingly.
 - Agencies are adequately managing their email and calendar records, but there is room for improvement through refining procedures and controls, and the integration of records management and information technology processes.

SUMMARY OF OVERSIGHT ACTIVITIES

- **Department of the Army Records Management**

NARA inspected the records management program of the Department of the Army (DA) as part of a multi-year plan to inspect the records management programs of the Department of Defense (DoD) components. The purpose of this inspection was to examine how well the DA complies with federal records management statutes and regulations and to assess the effectiveness of its records management policies and procedures. The engagement emphasized the coordination of records management program implementation across the DA including elements of the Headquarters, Department of the Army (HQDA), Army Commands (ACOM), Army Service Component Commands (ASCC), and Direct Reporting Units (DRU).

The DA records management program is in the midst of a rebuilding effort and faces difficult challenges to sustain a compliant records program as part of wider Army modernization strategies. Among these challenges are leadership support for records management activities, staffing issues, budgetary issues, and improving coordination and communications. As one of the largest programs in DoD, the DA records management program requires the full support of Army leadership as it works to find innovative solutions to meet the demands of records management in a rapidly changing operational environment.

ARMD faces numerous challenges including the need to modernize records management throughout Army offices, commands, and units to meet the requirements for daily recordkeeping as well as help ensure operational success of the service as an element of future multi-domain operations (MDO). The strength of the current program is that both the Director and the ARO bring a strong commitment to the proper management of records and a desire to see the return of a robust records program to the DA. The ARO has several initiatives that are addressing challenges to the program, and which are increasing the visibility and viability of ARMD including:

- Update Army records management regulations

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- Retool records management training making it mandatory for all personnel
 - Oversee, update or replace ARIMS
 - Increase coordination and communication with RAs / RMs throughout the Army
 - Review Army records schedules
 - Integrate records management into systems development
 - Conduct reviews electronic information systems (EIS) to schedule them
 - Involve records management in the implementation of A365 with updated records keeping requirements throughout the Army
 - Inventory and disposition legacy analog and electronic records

- **Federal Aviation Administration**

NARA inspected the RM program of the Department of Transportation (DOT) Federal Aviation Administration (FAA). The purpose of this inspection was to examine how well the FAA complies with federal RM statutes and regulations and to assess the effectiveness of its RM policies and procedures. In particular, it focused on managing electronic records, with emphasis on policies, strategic planning, training, and oversight. The engagement emphasized the coordination of records management program implementation across the FAA, including elements of Headquarters (HQ), Lines of Business (LOB), and Staff Offices (SO).

The FAA records management program is in a rebuilding effort to regain the visibility and effectiveness of the records program. The FAA's RM program complies with many, but not all, of the federal regulations. It also has several RM noteworthy practices for revitalizing the RM program and managing electronic records. Among the initiatives being undertaken by the RM program are:

- Revitalization of the RM program throughout the LOBs and SOs
- Development of an electronic records management application and toolkit (ERRA)
- Retooling records management training making it mandatory for all personnel
- Increasing coordination and communication with RCs/FCs throughout the FAA's Community of Practice (COP)
- Reviewing FAA records schedules

- **Managing Social Media Records Assessment**

NARA conducted interviews to understand how each agency uses social media (SM) and manages the related content and records. Discussions included Agency Record Officers (AROs) and other agency personnel responsible for developing and implementing policies, practices, and procedures for official agency SM accounts. SM content created in the course of agency business likely meets the definition of a federal record.

Participating Agencies included:

- Department of Defense/Secretary of Defense,
- Department of Education
- Department of Health and Human Services/Centers for Disease Control and Prevention

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- Department of Homeland Security
 - Department of Interior/United States Geological Survey
 - Library of Congress
 - National Aeronautics and Space Administration
 - National Archives and Records Administration
 - National Endowments for the Arts
 - Small Business Administration

SM platforms, and how agencies use these platforms, is an ever-evolving reality that presents several variables that make capturing and managing SM records challenging. All federal agencies must adhere to the recordkeeping mandates and best practices outlined in *NARA Bulletin 2014-02: Guidance on Managing Social Media Records*. Federal agencies should evaluate how it uses SM platforms, define what constitutes their SM records, and ensure those records are preserved and managed.

- **Records Management Assessment of Electronic Mail and Calendar Information Systems of the Peace Corps and U.S. Equal Employment Opportunity Commission**

This records system assessment addressed the Peace Corps' and the U.S. Equal Employment Opportunity Commission's (EEOC) management of records maintained in their electronic mail (email) and calendar information systems. This system assessment was performed to provide objective analysis, findings, and recommendations to assist the Peace Corps and EEOC as well as other federal agencies' management and those charged with governance and oversight to:

- Improve program performance and operations;
- Facilitate decision-making, and;
- Contribute to public accountability.

During this system assessment we discovered that both agencies managed, accessed, and retained and preserved email and calendar records. There is room for improvement for both agencies, but the records are currently not at high risk of being lost or damaged. The Peace Corps and EEOC have either recently completed a cloud migration for email systems or are currently in the process of a cloud migration. As there is perhaps no more relevant and topical subject matter in email management than its relationship with cloud computing, we felt that the lessons learned from this assessment would be instructive to other agencies that have yet to move to a cloud-based email system or have recently completed such a transition. This report provides a technical analysis for each agency with specific findings and recommendations that could also apply to similarly sized agencies.

RECOMMENDATIONS FOR EXECUTIVE ACTION

Overall, the challenges facing federal records management programs remain fairly consistent and must be faced with concerted effort and leadership. We believe that publishing the reports of our oversight activities semi-annually helps identify common themes and trends in records management, particularly for those agencies that have not yet been inspected or otherwise

engaged with us. We encourage SAORMs, other Senior Agency Officials, as well as Agency Records Officers and other Records Managers, to use this information to identify where they may have similar issues and proactively make adjustments.

NARA makes the following recommendations for SAORMs to consider based on the oversight activities covered by this report:

- SAORMs must ensure through policy and oversight that support for records management exists at all levels within their agencies including senior officials, executives, and program managers.
- SAORMs must establish a strategic plan for their records management program that outlines goals and objectives.
- SAORMs must provide leadership for their programs and ensure they are properly resourced and aligned with the agency's strategic information resource management plans.
- SAORMs should review *NARA Bulletin 2014-02: Guidance on Managing Social Media Records* and promote policies and procedures that ensure federal records identified in social media content are managed appropriately.

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

OVERSIGHT ACTIVITIES CURRENTLY IN PROGRESS

The following are selected oversight activities expected to be completed in the first half of FY 2024:

Annual Federal Agency Records Management Report

- Data gathering January - March 2024 for records management activities in CY 2023 using the annual SAORM reports, Records Management Self-Assessment, and Federal Electronic Records and Email Management questionnaires and templates.
- Validation of agency responses after the reporting period closes and drafting of the annual report to Congress.

Multi-Agency Inspections

- Records Management in Legislative Branch Agencies
- Indian Affairs Records within the Department of the Interior's Office of Indian Affairs, Bureaus of Indian Affairs, Trust Fund Administration and Indian Education and the American Indian Records Repository

Systems Inspections

- System Inspection: Database Internal Control Review



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