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Department of the Air Force
Records Management Program

Records Management Inspection Report

National Archives and Records Administration
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DEPARTMENT OF THE AIR FORCE RECORDS MANAGEMENT PROGRAM

INSPECTION REPORT

INTRODUCTION

The National Archives and Records Administration (NARA) is responsible for assessing the proper management of records in all media within Federal agencies to protect rights, assure government accountability, and preserve and make available records of enduring value.¹ In this capacity, and based on authority granted by 44 United States Code (U.S.C.) 2904(c)(7) and 2906, NARA inspects the records management programs of agencies to ensure compliance with Federal statutes and regulations and to investigate specific issues or concerns. NARA then works with agencies, if necessary, to make improvements to their programs based on inspection findings and recommendations.

During the period September-November 2018, NARA inspected the records management (RM) program of the Department of the Air Force (DAF) as part of a multi-year plan to inspect the RM programs of the Department of Defense (DOD) components. The purpose of this inspection was to examine how well the DAF complies with Federal records management statutes and regulations and to assess the effectiveness of its records management policies and procedures. In particular, it focused on the management of electronic records, including email and social media communications, with emphasis being placed on policies, strategic planning, training, and oversight. Additionally, it sought to identify practices of interest to other DOD agencies and the wider Federal records management community.

OVERVIEW OF THE DAF RM PROGRAM

At the time of the inspection, the RM program of the DAF was administered through the Information Access Policy and Compliance Branch aligned under the Secretary of the Air Force (SAF) Office of Information Dominance and Chief Information Officer (CIO), and was led by the Deputy CIO who was also the Senior Agency Official for Records Management (SAORM). The program is now aligned with the Compliance Division under the SAF Deputy CIO (known as SAF/CN), with the Air Force Chief Information Security Officer as the new SAORM. Day to day activities of the program are managed by a full-time Records Officer (RO) with the assistance of one full-time military member and one full-time contractor. The RM program also has a tiered network structure of RM professionals in various levels throughout the Air Force (AF) to implement and oversee the program. This includes Command Records Managers (CRMs) at the AF Major Commands (MAJCOM), Air Force Reserve Command (AFRC), the Air National Guard (ANG), and Headquarters Air Force (HAF); Agency Records Managers (ARMs) at Field Operating Agencies (FOA) and Direct Reporting Units (DRU); and Base Records Managers (BRMs) at Air Force installations. The CRMs, ARMs, and BRMs are full-time RM professionals with many supported by teams with additional RM staff. In addition, the Commander or Civilian Director of each AF unit at his or her discretion may designate Point of

¹ 44 U.S.C. Chapter 29, <https://www.archives.gov/about/laws/records-management.html>.

Contacts (POCs) who are assigned RM responsibilities for their unit. The responsibilities for all RM roles are defined in Air Force Instruction (AFI) 33-322, *Records Management Program*, and collectively are called “RM Professionals.”²

The DAF has four RM regulations (listed in Appendix B) that implement Federal RM statutes and regulations governing the life-cycle management of AF records for approximately 750,000 service members, civilians, and contractors. Three of the regulations were updated in 2017-2018 to implement changes directed by the Secretary of the Air Force (SecAF)/Chief of Staff of the U.S. Air Force (CSAF)³ in 2016 that eliminated, reduced, or reassigned 29 additional duties throughout the Air Force. The direct impact of the SecAF Memo on the AF RM program was the elimination of three RM duties previously mandated by AFI 33-322: the Chief of the Office of Record (COR); the Record Custodian (RC) assigned in every office throughout the AF; and the Functional Area Records Manager (FARM) assigned in all AF units. The elimination of these roles required adjustments to the entire AF RM structure, including policies, authorities, and responsibilities, to ensure the continuity of the program.

In its current state, the DAF RM program is compliant with many, but not all, of the Federal regulations in 36 Code of Regulations (CFR) Chapter XII, Subchapter B.⁴ It also has several RM practices of interest to other DOD and Federal agencies that are listed in the Noteworthy Practices section of this report. This report makes 9 findings and 16 recommendations to bring areas of the program into compliance with Federal regulations.

FINDINGS AND RECOMMENDATIONS

PROGRAM MANAGEMENT REQUIREMENTS

Finding 1: The Air Force Records Office is understaffed to effectively manage and oversee the RM program in accordance with 44 U.S.C. 3102 and to fulfill its responsibilities under Federal, DOD, and Air Force regulations.

44 U.S.C. 3102 requires Federal agencies to establish and maintain an active, continuing program for the economical and efficient management of agency records. An essential part of maintaining an active, continuing program, requires adequate staffing to ensure that a RM program can apply standards, procedures, controls, and techniques designed to improve the management of records, promote the maintenance and security of records deemed appropriate for preservation, and facilitate the segregation and destruction of records of temporary value. A prior NARA inspection report issued in 2005 noted the same lack of staffing during the period 2002-2004.⁵

For many years the Air Force has had one person assigned to the AF Records Office with occasional periods of a second civilian or contractor assigned to support the program.

² AFI 33-322, https://static.e-publishing.af.mil/production/1/saf_cio_a6/publication/afi33-322/afi33-322.pdf.

³ Hereinafter SecAF Memo.

⁴ 36 CFR Chapter XII, Subchapter B, <https://www.ecfr.gov/cgi-bin/text-id.x?tpl=/ecfrbrowse/Title36/36CXIIsubchapB.tpl>.

⁵ NARA Report, Records Maintenance and Disposition in Headquarters Air Force (HAF) Offices.

Traditionally, the AF Records Office is seen as a policy-making body, which accounts in some measure for the lack of staff assigned to the program. To keep the operational activities of the records management program functioning, the RO relies heavily on the support of the CRMs to fulfill many of the key program responsibilities identified in AFI 33-322. For the past decade a centralized office of CRMs at Scott AFB has carried out many RM program functions including RM training for the Major Commands and their Wings. The RO has also delegated the scheduling of AF records to one of the CRMs. While these CRMs have provided crucial support to the AF Records Office, their numbers have also been reduced. With the centralization of the CRM offices in 2007, the number of CRMs at the 10 MAJCOMs was reduced from 18 to 10. At the time of this inspection in 2018 the number was further reduced to six.

An organization of the size and complexity of the AF should have more than one or two staff members assigned to coordinate the work of such a large network of individuals who are responsible for the implementation of records management policies, procedures and duties across the organization. There should also be more than six staff members responsible for ensuring that personnel are trained and understand their RM responsibilities under the law, DOD regulations, and AF policies. Additionally, it is difficult for the RO and the CRMs to monitor, oversee, and evaluate the work of BRMs at 59 bases in the continental United States alone.

The long-term lack of assigned staffing in the AF Records Office has had a direct impact in three critical program-level areas that were found to be out of compliance by the NARA inspection team. These areas include untimely and inadequate updates of RM directives (Finding 2), the failure to schedule new records coupled with the failure to provide timely reviews and updates of existing records schedules (Finding 4), and insufficient controls for the oversight of the RM program (Finding 6). The continued lack of adequate staffing for the AF Records Office prevents it from fulfilling key RM functions that affect efficiency and performance of the entire program and increases risk to records across the organization.

The risk to AF records increases the risk of the AF not having the information it needs to carry out mission critical functions or document decision making. Therefore, it is necessary for the AF SAORM to address whether or not the current RM staffing level is adequate for an organization this large.⁶

Recommendation 1.1: The Air Force SAORM should review and confirm the duties and responsibilities of the AF Records Office already defined in AFI 33-322. (NARA Bulletin 2017-02)

Recommendation 1.2: The Air Force SAORM should determine and assign sufficient resources to the AF Records Office to carry out its responsibilities and to meet the requirements of 44 U.S.C. 3102 and the applicable Federal, DOD, and AF regulations. (36 CFR 1220.34 (a))

⁶ NARA Bulletin 2017-02, <https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html>, states “SAORMs must identify and advocate for the financial, personnel, and technological resources necessary to ensure that adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency are preserved and usable for as long as needed to protect the legal and financial rights of the Government and of persons directly affected by the agency’s activities.”

Finding 2: Air Force publications providing policies and procedures for changes to the RM program have not been issued in a timely manner.

To implement the 2016 SecAF Memo, three of the AF's four RM publications required major changes to shift roles and responsibilities, update terminology, address how RM training will be delivered and how internal program evaluations will be conducted and by whom. The affected publications are: AF Instruction 33-322, *Records Management Program*; AF Manual (AFMAN) 33-363, *Management of Records*; and AFMAN 33-364, *Records Dispositions-Procedures and Responsibilities*.⁷

At the locations visited, the CRMs, ARMs, and BRMs explained the challenges and difficulties they experienced and the actions they took to minimize disruption to the program while changes to policy and procedures required by the 2016 SecAF Memo were under development. Many AF personnel interpreted the memorandum to mean that RM duties were no longer required. In fact, some units immediately eliminated the RM duties assigned to their personnel and effectively stopped managing their records.

According to the SecAF Memo, AF Instructions were to be revised to reflect the new changes no later than 1 October 2016. Interim changes to the three AF RM publications for implementing the SecAF Memo were issued in 2017 and 2018 in the form of Air Force Guidance Memorandums (AFGM), which are short-term, valid for only a year, while the publications are officially changed or finalized. All three guidance memorandums were reissued in May and June 2019, extending the changes for another year, while the AF Records Office consolidates the RM publications into a single manual to be issued by the end of FY 2019. This will be three years after the major change was issued.

According to the Air Force Records Office, the delay with issuing timely RM policy was due to coordination delays with AF functional offices. Given the magnitude of the changes required by the SecAF Memo in 2016, new guidance to clarify RM requirements, minimize confusion and risk to records, and maintain the stability of the program should have been issued immediately. The delay directly affected many areas of the RM program, as shown in the CRM's semi-annual trend analysis (see Noteworthy Practices).⁸ Clear, adequate, and timely updates to RM directives are necessary and will help restore the program and its compliance with Federal regulations. The AF Records Office should work with functional offices to improve response time to ensure the consolidated RM publication and future revisions are issued in a more timely fashion according to AF policy.

Recommendation 2: The Air Force Records Office must complete the revision of RM publications and distribute them throughout the organization and to NARA. (36 CFR 1220.34 (c))

⁷ AFMAN 33-363, https://static.e-publishing.af.mil/production/1/saf_cio_a6/publication/afman33-363/afman33-363.pdf, and AFMAN 33-364, https://static.e-publishing.af.mil/production/1/saf_cio_a6/publication/afi33-364/afi33-364.pdf.

⁸ ACC/CYSS/CYI Memorandum, Semi-annual Records Management (RM) Trend Analysis (1-Aug 18-1 Oct 18), dated October 15, 2018.

Finding 3: Not all AF Bases comply with AF directives for implementing the AF RM program, and some Bases do not provide sufficient support to BRMs reducing compliance with Federal, DOD and AF regulations.

36 CFR 1220.34 (c) requires agencies to issue a directive(s) establishing program objectives, responsibilities, and authorities for the creation, maintenance and disposition of agency records. AFI 33-322, which implements this CFR requirement, requires Commanders and Civilian Directors at all levels to provide a Records Management Plan “within 60 days of taking command” for implementing the RM Program for their units. The AFI also lists the Commander/Civilian Director RM responsibilities, including support for the BRMs to “*ensure the integrity of the RM program.*” The contents of the RM plan, and a sample, are provided in the AFI to ensure accountability of the program and that the AF complies with Federal and DOD regulations.

While the requirement for Commanders/Civilian Directors to develop official RM Plans is new, BRMs have been developing them unofficially and using them at their bases for years as part of their RM base-level programs. AF BRMs receive extensive RM training and are full-time RM professionals, most with many years of RM experience. They have the capacity to manage and maintain effective RM programs for Commanders at their bases, but cannot be effective nor enforce regulations without senior leader support. This support is the most critical element for successfully implementing and maintaining a compliant RM program.

The effectiveness of this support was evident at Headquarters AF (HAF), Joint Base (JB) Andrews, Scott Air Force Base (AFB), Robins AFB, and JB San Antonio where the Commanders/Civilian Directors were involved with their RM programs, and empowered their ARMs and BRMs to implement the RM program at their locations. All of the six AF units visited (see Appendix A) had approved RM plans in place with only a few under review by the BRMs or pending approval by the CRMs. Most of these ARMs and BRMs went beyond the AFI requirement by developing consolidated Base RM Plans for all Commanders/Civilian Directors at their installation. The consolidated RM plans used at these bases provide continuity and consistency for the RM program across all base units and minimizes the number of plans the BRMs need to manage.

However, NARA received documentation indicating that other AF bases have not complied with the new AF RM directive nearly two years after the requirement to submit a RM plan was issued in May 2017. Four bases in particular have RM plans that were reviewed and approved by the CRMs but have been waiting for the Commander’s signature for six months. The documentation NARA received also shows that BRMs at several bases do not receive sufficient senior base-level support to implement an effective RM program at their bases. The lack of support includes, but is not limited to:

- Unit Commanders not delegating authority to appropriate staff to execute RM
- Records inventories that have not been completed
- RM training that has been overdue since 2016
- Late responses to non-FOIA record searches, and
- Poor support for staging areas.

The documentation contained several communications sent by senior AF officials and CRMs to bring these bases into compliance, including a SAF/CIO Memorandum sent in April 2018 clarifying that the AF RM program was not eliminated and that RM Plans from all base Commanders/Civilian Directors are required to comply with AF regulations. Yet, despite the communications and regular RM status reports provided by ACC/CYSS to MAJCOM CIOs pointing out the deficiencies, several bases continue to fail to support their BRMs in their efforts to comply with the AF directive and implement the AF RM program at their bases.

Recommendation 3.1: AF bases that have not submitted a RM Plan for implementing the AF RM program at their bases must do so immediately in accordance with AF RM directives. (36 CFR 1220.34 (c))

Recommendation 3.2: The RO should request through SAF/IG evaluations of the AF bases that are not compliant with AF RM directives. (36 CFR 1220.34 (j))

RECORDS SCHEDULING REQUIREMENTS

Finding 4: Air Force records are not regularly scheduled and existing records schedules are not updated as required by 36 CFR 1225.22.

36 CFR 1224.10 (a) requires Federal agencies to ensure Federal records are scheduled; and (c) to regularly review schedules and update them as needed. Examination of AF records scheduling practices and documentation show that the AF has not consistently scheduled its records or updated them and has maintained records in unscheduled status for more than 20 years.

- The AF Records Disposition Schedule (RDS) contains 98 unscheduled record items. Many have been unscheduled since 1996.
- The Information Technology Investment Portfolio Suite (ITIPS) inventory of AF electronic information systems provided by the RO shows an additional 64 systems that are unscheduled.
- There are an additional 41 requests from AF units for changes to existing dispositions that have not been acted upon for many years.

The RO stated that delays with scheduling records and updating dispositions was due to lack of RM staff at the AF Records Office level (Finding 1) to process schedules. To address the scheduling backlog the RO tasked the CRMs to include the scheduling of unscheduled records and updating of existing approved dispositions as part of an aggregate or “Bucket” scheduling project designed to reduce the number of existing AF records schedule items (See Bucket Schedule Initiative in Noteworthy Practices). While this project is underway the submission of new records series and systems to NARA has been halted or interrupted. While the creation of bucket schedules is important to the eventual improvement in AF records disposition schedules, it will take several years to process them and gain final approval from NARA. By interrupting most routine scheduling of new records or systems, AF continues to add to its backlog of unscheduled records.

Unscheduled records are required by law to be treated as permanent records and must be

maintained indefinitely until a disposition is authorized by NARA. Delays in scheduling records places the burden of additional administrative costs on AF units. Failure to schedule records over the course of many years exposes AF units to the threat of unauthorized disposals of records and increases their responsibility to respond to FOIA requests for records that may be temporary. Records in unscheduled electronic systems cannot be deleted, and the Air Force continues to pay storage costs at Federal Records Centers (FRC) for maintaining unscheduled paper records. The 2018 annual FRC Disposition Profile Report for the Air Force shows that NARA's FRCs store 24,794 cubic feet of Air Force unscheduled records at a cost of \$119K per year.

Recommendation 4.1: The Air Force should separate the scheduling of new and unscheduled records, and updating existing schedules, from its bucket schedule initiative to prevent further delays in scheduling records.

Recommendation 4.2 The Air Force must create and implement a plan to schedule its backlog of unscheduled records in a timely manner in accordance with Federal regulations to avoid unnecessary costs and burden on Air Force units.(36 CFR 1220.10 (a) and (c) and 1225.22)

TRAINING REQUIREMENTS

Finding 5: The content of RM training for AF Users is inconsistent, not standardized, and is not made readily available to AF personnel.

36 CFR 1220.34 (f) requires agencies to provide guidance and training to all agency personnel on their records management responsibilities. NARA Bulletin 2017-01, *Agency Records Management Training Requirements*, provides the minimum required content areas for annual records management training to provide consistency and standardization of content.⁹ In line with the bulletin, the AF provides four levels of RM training based on roles and responsibilities specific to: Commander/Civilian Director (if delegating RM duties, the Commander-designated POC would take the training); CRM and ARM; BRM; and AF User which includes all AF military, civilian, contractor, and foreign national personnel employed by the AF. In addition, all AF personnel regardless of role are required to receive initial AF User training after assignment and annually thereafter.

Review of the role-based training materials at most of the bases visited showed standardized information applicable to the role and it was made available through the ARM's or BRM's SharePoint Sites. Of the four levels of training given, AF User training at some locations, which is intended for all AF personnel, varies in content based on which unit created it and how it is made accessible to unit personnel.

The greatest challenge mentioned by all of the designated POCs interviewed was the time needed to create, deliver, track, and make available RM training for their unit personnel. Prior to current AF policy, all AF RM training including AF User training was made available in the Advanced Distributed Learning Service (ADLS) where it was standardized, consistent, and monitored to ensure completion. In April 2017, RM training for AF Users was removed from ADLS based on the October 2016 SecAF/CSAF Memorandum for Reducing Ancillary and Computer Based

⁹ NARA Bulletin 2017-01, <https://www.archives.gov/records-mgmt/bulletins/2017/2017-01-html>.

Training, and became the responsibility of Commanders/Civilian Directors or their designated POCs. Under current AF policy, Commanders/Civilian Directors or their designated POCs are responsible for training AF personnel in their units and tracking the training. While most of the bases visited had standardized AF User training developed by the BRM, not all of the bases visited were set up in the same manner. At one base with as many as 80 units, each of the designated POCs were required to develop their own AF User training for their unit members in addition to providing the training, tracking it, and making it available for unit personnel.

While the current AF policy introduced content inconsistencies and non-standardization of RM training for the largest portion of AF personnel, the CRMs are developing new interactive RM training for all of the AF RM roles, including AF User training. Their goal is to reduce the time it takes to complete the training and to make it more effective by applying knowledge checks. Completion of this initiative would satisfy the need to ensure standardized training is provided to all AF personnel and improve RM training across the AF. At the time of the NARA inspection, however, the required funding for software to develop role-based training modules had not been approved by the AF.

Standardized AF User training that is accessible to all AF personnel is necessary to ensure AF personnel properly create, identify, maintain, and dispose of AF records according to Federal, DOD, and AF regulations. Until the CRMs training initiative is funded, developed, and made available to all AF personnel, the AF User training developed by the BRMs at Scott AFB, Robins AFB, and JB San Antonio, and other bases where the BRMs have done the same, should be shared with other bases to ensure that consistent content is provided to all AF personnel.

Recommendation 5.1: The RO must ensure that AF User training for all AF personnel is standardized and consistent for all AF personnel so that records are properly maintained throughout their life-cycle. (36 CFR 1220.34 (f) and NARA Bulletin 2017-01)

Recommendation 5.2: Funding and deployment of the CRM's RM training initiative should be considered by senior officials, to provide a more efficient and standardized method of training AF personnel in all AF units.

EVALUATION REQUIREMENTS

Finding 6: AF RM Professionals need better access to evaluation results of AF RM programs.

36 CFR 1220.34 (j) requires agencies to conduct formal evaluations of their RM programs to measure their effectiveness and to ensure compliance with NARA regulations.

At the time of the inspection, evaluations of the AF RM program were conducted as part of the Secretary of the Air Force Office of the Inspector General (SAF/IG) inspection program. AFI 90-201¹⁰ includes three evaluation methods used by SAF/IG:

¹⁰ AFI 90-201, The Air Force Inspection System, https://static.e-publishing.af.mil/production/1/saf_ig/publication/afi90-201/afi90-201.pdf.

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- Unit Self-Assessments where Commander Designated POCs and BRMs complete Self-Assessment Communicators (SACs) every six months using the Management Internal Control Toolset (MICT). These are designed to detect non-compliance with regulations.
 - Wing Inspections conducted by the Wing IG with participation by BRMs every 18-24 months under the authority of Wing Commanders to validate Unit Self-Assessments and enter the results into the Inspector General Evaluation Management System (IGEMS).
 - Unit Effective Inspections (UEI) conducted by MAJCOM IGs to assess the effectiveness of the Commanders Inspection Program of its Wings and to identify risks and improvements for the Commanders Inspection Program. These serve as a validation of the Unit Self-Assessments.

Staff Assistance Visits (SAVs) are a fourth method of evaluating the AF RM program and are separate from the IG process. Under the new RM policy, mandatory SAVs performed by CRMs and BRMs are no longer conducted. Instead, Commanders decide when SAVs are conducted in accordance with their Base or Organizational RM Plans. According to SAF/IGI, Commanders are empowered to make risk decisions for unit RM programs, and Wing Commanders may direct a SAV of any unit within the Wing or request a SAV from higher headquarters at any time. CRMs and BRMs are encouraged to discuss RM program risks with Commanders who decide if a SAV is needed.

During the site visits, the inspection team was informed by RM professionals that there has been a noticeable effort to reduce evaluation mechanisms, including:

- The reduction of SAVs conducted by the CRMs and BRMs
- Elimination of RM from AF By-Law inspections¹¹
- Requests to reduce the number of questions in the BRM SAC in MICT
- And the optional use by some units of the RM SACs in MICT

Completion of the RM SACs in MICT at some units were optional and it was halted for all offices in one of the MAJCOMs visited. Since the information gathered from Self-Assessments is used to identify which RM programs are at risk of noncompliance, that leads to Wing Inspections and subsequently UEIs, the units and offices that do not complete the RM SACs in MICT will not receive any evaluation.

In addition, some of the BRMs visited stated they do not participate as WIT members and some were unable to access the results in MICT and the results in IGEMS, making it very difficult for them to determine compliance of their Base RM programs. Comments received by SAF/IGI, however, state that the IG does not prevent BRMs from participating in its inspections or accessing the RM data in MICT and IGEMS. The BRMs can request participation and access.

BRM participation in evaluations and access to the evaluation data is critical to the effectiveness of the BRM role allowing them to identify and assist with correcting deficiencies, monitor trends, and make improvements that can minimize risk and noncompliance. BRMs regularly communicate the state of their base RM programs to their CRMs, who in turn communicate the

¹¹ Ibid. IG inspections also include events such as technical evaluations or inspection/oversight activities required by law or statute.

state of the RM program up the chain to the AF RO and the SAORM. These AF officials are required to submit to NARA annual Records Management Self-Assessment (RMSA) reports and annual Senior Agency Official Records Management (SAORM) reports.

NARA acknowledges SAF/IGI's reporting requirements to Commanders and its directives for implementing the AF Inspection System under AFI 90-201, as well as its commitment under the SecAF Memo to reduce inspections where possible. As such, the AF RO and the SAORM continue to have a role and responsibility to meet Federal RM mandates and report annually to NARA on the oversight of the AF RM program as laid out in NARA Bulletin 2017-02.¹² The AF Records Office should improve upon its partnership with SAF/IGI to clearly define its and the SAORM's oversight roles and responsibilities to meet Federal RM requirements.

Recommendation 6.1: The AF RO must work with SAF/IGI to require completion of the RM Self-Assessment Communicators in MICT to ensure the AF RM program is evaluated. (36 CFR 1220.34(j))

Recommendation 6.2: The AF RO should identify and request through SAF/IGI any BRMs requiring access to the RM results in MICT and IGEMS in order for them to fulfill their responsibilities for implementing the RM program at the Base level.

Recommendation 6.3: In coordination with SAF/IGI, the AF RO should institute a review of the current evaluation system for RM in the AF to determine the most effective and efficient means to review the program and institute recommended changes at all levels of the organization.

ELECTRONIC RECORDS MANAGEMENT REQUIREMENTS

Finding 7: Air Force RM publications providing policy and procedures for the storage of long-term temporary electronic records are unclear placing these types of electronic records at risk.

36 CFR 1236.10 provides a list of management controls agencies must implement to ensure electronic records are maintained for agency business for as long as the information is needed.

For the areas we visited, there was sufficient control of permanent electronic records, however, the review of the AF RM publications shows that the policy and procedures for maintaining and storing long-term temporary electronic records is confusing and in some cases conflicting:

- AFMAN 33-363, paragraph 2.4.3.1 provides some guidance allowing for the storage of long-term temporary electronic records on storage area networks (SAN); the use of platters, discs, and CDs for off-site storage; or the Enterprise Information Management (EIM) storage.

¹² NARA Bulletin 2017-02, <https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html>, states: "The Federal Records Act (FRA) requires the head of each Federal agency to establish and maintain an active, continuing program for the economical and efficient management of the records of the agency. To this end, the SAORM acts on behalf of the agency head to ensure the agency efficiently and appropriately complies with all applicable records management statutes, regulations, NARA policy, and OMB policy."

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- AFI 33-322 requires Commanders and Civilian Directors to explain in their RM Plan how the life-cycle of records, both paper and electronic, will be maintained, including medium and long-term temporary records. It also recommends medium to long-term paper records be digitized to decrease demand for staging area space, but does not provide information for storing the digitized records.
 - The AF Electronic Records Management (ERM) Solution Guide, states long-term temporary electronic records will be kept on the ERM drive for up to 10 years, then transferred to CD-ROMS in NARA-approved formats.¹³

Taken together these publications does not provide clear standard policy and procedures with minimum preservation requirements for maintaining long-term temporary electronic records. Failure to provide clear, consistent guidance in AF publications for storing long-term temporary electronic records puts the records at risk for loss or damage potentially making them inaccessible due to corruption or degradation.

Recommendation 7: The AF must issue clear consistent policies and procedures that ensure the maintenance and storage for all temporary electronic records that include updated requirements for long-term electronic records storage requirements. (36 CFR 1236.10)

Finding 8: As currently configured, many AF personnel are prevented from accessing their electronic records in the AF ERM drive and do not use it for maintaining their electronic records, making it ineffective as an official storage and retrieval repository.

36 CFR 1220.32 (c) requires agencies to make records available when needed, where needed, and in a usable format to conduct agency business. In addition, 36 CFR 1226.30 (b)(5) requires appropriate rights for users to access electronic records to facilitate the search and retrieval of electronic records.

In 2006-2007, the AF Records Officer initiated a program to manage electronic records using structured shared drives at each AF installation as a temporary measure until an enterprise record-keeping solution is identified and implemented. The purpose of the temporary structured shared drives, called the “ERM drive”, was to reduce the printing and filing of records and to consolidate electronic records that were kept on desktops, unstructured shared drives, and collaboration tools such as SharePoint. The AF ERM Solution Guide, dated 2007, provides detailed information for organizing the “ERM drive” using the AF file plan (currently known as the inventory of records). It also contains instructions for setting up permission groups to control access to electronic records by AF personnel at different levels of the organization.

Based on information from site visit interviews, it is apparent that significant numbers of AF personnel are prevented from accessing their active and inactive electronic records in the ERM drive. The Solution Guide allowed Records Custodians (currently known as Designated POCs at the Commanders’ discretion) to decide who can access the electronic records in the ERM drive for their office. BRMs then place office personnel in appropriate permission groups. The way the drive is currently configured, access to folders is limited, and in many cases, the AF personnel who created the electronic record can no longer access their own records, forcing them to contact

¹³ Air Force Electronic Records Management (ERM) Solution Guide, September 2007.

the Designated POC to obtain a copy if needed for business purposes. While there were some offices visited that allowed read-only access to certain folders, and a few that allowed full access to file and access records directly, the overwhelming majority of offices visited prevented their AF personnel from having any access to their electronic records once filed on the ERM drive.

According to the Designated POCs, the reasons for these restrictions was to protect access to records containing personal identifiable information (PII) or other sensitive data, and to minimize filing mistakes by personnel. While these reasons are valid to some degree, there are several permission groups already established that allow AF personnel read-only access to electronic records for business purposes that include restrictions for filing or deleting the records. There are also established permission groups that can be applied to folders containing PII and other sensitive records or that can be separated from other electronic records needed for day to day business purposes.

In many cases the configuration of the ERM drive discourages its use and pushes personnel to continue using their shared drives, SharePoint and other tools where electronic records can be easily accessed for daily use. A number of offices interviewed were storing records in SharePoint, which cannot be locked down to prevent PII violations. Many offices also admitted they do not transfer records from sources such as shared drives, organizational e-mail boxes, task management systems, or SharePoint to the ERM. According to the AFI 33-322 these are not approved repositories for storing electronic records. The failure to properly manage and store official electronic records puts the records at risk of duplication, unauthorized disposals, and complicates records searches. It also increases the risk that an unknown volume of essential information is not available for decision making because it is not filed in the officially designated location.

One of the AF's RM goals in its Strategic Plan is to implement an enterprise-wide solution that will enable AF personnel to better manage and store its electronic records. The Defense Enterprise Office Solution (DEOS), offered by the Defense Information Systems Agency (DISA), is a potential solution the AF is considering. In the meantime, use of the ERM drive as a temporary solution needs to be reconfigured to allow all AF personnel access to their electronic records for business purposes and decrease the risk of duplication of files, loss of records, accidental release of PII and other records hazards.

Recommendation 8.1: The AF must review and update the 2007 AF ERM Solution Guide to ensure access by all AF personnel is given to electronic records needed for business purposes. (36 CFR 1220.32 (c))

Recommendation 8.2: The AF must review and properly place AF personnel in the appropriate permission groups in the ERM drive to allow access to electronic records needed for business purposes. (36 CFR 1226.30 (b)(5))

Finding 9: The AF does not have sufficient controls in place to implement records schedule dispositions for electronic information systems (EIS) to prevent unauthorized dispositions.

Several Federal regulations require the mandatory application of approved records schedules for agency records (36 CFR 1226.10); the development of controls to protect against unauthorized

deletion of records (36 CFR 1236.10 (b)), and for agencies to ensure the timely, authorized disposition of records in electronic information systems (36 CFR 1236.26 (b)(7)).

The AF has done well integrating RM into processes for the design and development of EIS and the tracking of EIS throughout its lifecycle using the Information Technology Investment Portfolio Suite (ITIPS). Based on the registration criteria, the ITIPS registry tracks EIS used AF-wide and ITIPS has controls in place to ensure all EIS are scheduled. The RO uses the data in ITIPS to identify existing dispositions or to schedule electronic records in EIS that are unscheduled (see Finding 4). What is missing is the records schedule implementation of approved dispositions and controls in EIS informing system program managers and system users of authorized dispositions or unscheduled electronic records in EIS.

During one of the site visits, the inspection team met with system program managers where it learned they had developed a base-level system that clearly contained official electronic records. The program managers were unaware whether the system's electronic records had an approved disposition, but knew its system users were already deleting the records. Review of the ITIPS listing provided by the RO shows that the disposition for the records in this system still needs to be confirmed by the RO. Fortunately, the BRM at this location immediately took action to work with the system program manager to recover deleted records and then worked with the RO to determine the appropriate disposition for the electronic records for the system. Even though this is only one example, it is not unreasonable to assume that similar occurrences could happen at other locations.

Review of all documentation provided by the RO shows no records schedule implementation instructions or sufficient controls for records in EIS. The lack of records schedule implementation instructions and controls, and the lack of necessary communications to program managers of EIS and its users of authorized or unscheduled dispositions, places the electronic records in all AF EIS at risk for unauthorized destruction and/or overdue disposals.

Recommendation 9.1: The AF must develop records schedule implementation instructions and controls for AF EIS and share it with EIS program managers and users to ensure electronic records are protected and disposed of in accordance with approved records schedules. (36 CFR 1236.10 (b))

Recommendation 9.2: The RO must identify and report to NARA if any unauthorized dispositions of electronic records have occurred from the lack of records schedule implementation instructions and controls required for AF EIS. (36 CFR 1230.14)

NOTEWORTHY PRACTICES

Department Level:

- The involvement of the AF Records Office in the design, development and decommissioning processes for AF EIS, with access and input into the ITIPS system, is an example of RM as an added value. ITIPS is used as a registry for AF systems tracking the lifecycle of systems with milestones built into the process that must be accomplished, including RM, before systems become operational. This is a practice that could serve as a

model for other Federal agencies to consider implementing.

- The digitization effort encouraged by the AF, which will help reduce the number of Base Staging Areas, will allow the AF to better manage inactive records and significantly reduce the costs for maintaining records storage facilities.

MAJCOM Level:

The CRMs in the Centralized CRM Office and at HQ AFRC have several noteworthy practices that have made or will make significant improvements for AF RM program as a whole. These include:

- The Bucket Schedule Initiative underway by the Centralized CRM Office, when completed, will significantly reduce the number of AF record items and dispositions increasing program efficiency and improving automation of RM across the AF.
- An interactive records management training course is under development by the CRMs that will provide consistent role-based training for all AF personnel if approved and initiated.
- The exploration of capabilities and configuration of the SharePoint Records Center by the Centralized CRM Office and HQ AMC/Judge Advocate (JA) Office to replace the ERM drive could serve as a better solution to file, access, and dispose of electronic records until a long-term solution is implemented.
- Reinstating the Semi-Annual Trend Analysis by the CRM Office to help identify and address program deficiencies and focus resources.
- Participation by the AFRC CRM in AFRC UEI inspections is an example of a practice that can be applied to all AF MAJCOMs increasing evaluations of bases across the AF.
- Development of one Commanders/Directors RM Plan template by the AFRC CRM for all AFRC units and offices Command wide provides consistency and reduces time for reviews, updates, and approvals.
- AFRC's creation of a central repository for all of its digitized staged records that could be expanded to all AF Commands.

FOA and DRU Level:

The ARMs at the HAF and at AFPC have established good practices in their organizations to include:

- The HAF ARM's RM Strategic Plan has excellent goals and milestones.
- The HAF ARM ensures compliance of 144 HAF systems, and participates in parade reviews of many IT systems which helps build close relationships between IT and RM.
- The implementation of a single Commander's Plan for the HAF in the form of an Operating Instruction that carries more authority than just a plan.
- The AFPC ARM has extensive knowledge of how permanent and long-term temporary electronic records are maintained within complex integrated systems due to involvement with and support from AFPC's system portfolio managers and systems owners.

Base Level:

The BRMs at the locations visited have developed good practices, including:

- Developing consolidated Base RM Plans to reduce the number of plans to review and approve;
- Establishing well organized Base Staging Facilities to better manage and protect inactive records prior to destruction or transfer to Federal Records Centers;
- Funding and initiating digitization projects in Base Staging Areas;
- Conducting reviews and audits of shared drives and SharePoint to identify records for transfer to the ERM drive and to reduce duplication and avoid privacy violations; and
- Developing more effective SAV checklists to determine the true state of the RM program in base units.

CONCLUSION

Records management in the AF has many challenges given the size and complexity of the Department. The transition over time from paper to electronic records is one of the biggest challenges for the AF. Practices for managing electronic records are manually intensive. In addition, recent RM policies and the restructuring of the RM program have raised new challenges and risks to parts of the program, which are detailed in Findings 2, 3, and 5. Under the previous RM policies and structure, there was less risk and more assurance that a well-functioning RM program would be implemented in a uniform way throughout the Air Force because the designation of specific RM positions at bases and other units was mandated. Under the new RM policies and structure, Commanders decide how to implement the RM program in their unit as they deem appropriate. Commanders that implement an RM program following Federal, DOD, and AF RM guidelines, will have less risk and difficulty in meeting Federal RM requirements. This was found by the inspection team at most of the locations visited. However, Commanders that implement an RM program that does not follow Federal, DOD, and AF RM guidelines, will increase the risk of not managing records compliantly within their unit nor meet Federal RM requirements.

It should be noted that, while the new policies and restructuring of the program caused some confusion and unintended consequences in how RM is implemented across the AF, these consequences likely are short-term and can be corrected as the RM program fully transforms under the new policies over time. There also have been some beneficial changes due to the new policies and restructuring, such as: directly informing the Commanders/Civilian Directors at all levels of the status of their RM program instead of only the former CORs in an office; consolidating many records inventories to reduce redundancies; and at the discretion of the Commanders, placing Designated POCs in the appropriate units where needed instead of in every office.

The findings in this report identify some areas of noncompliance that have existed for many years, such as the scheduling and maintenance of records; recent areas of noncompliance due to directive changes, such as training and oversight; and some areas of noncompliance with managing electronic records, such as access to and storage of electronic records. This report contains recommendations for assigning adequate staff and resources at the necessary levels, providing clear and consistent RM policies and procedures in AF RM directives, and most

importantly ensuring adequate senior leadership involvement and support where needed that could significantly improve the AF RM program. Other recommendations in this report correct areas in the AF RM program that are not compliant (or partially compliant) and to minimize the risks to AF records to ensure they are readily accessible to support the AF's mission essential functions. They are intended to help the AF RM program comply with Federal statutes and regulations and ensure that the agency is accountable to Congress and the public. Follow-up actions required for DAF and NARA are included in Appendix C.

APPENDIX A INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine how well the DAF complies with Federal records management statutes and regulations and to assess the effectiveness of its RM policies and procedures.

METHODOLOGY

NARA carried out this inspection by conducting interviews at DAF Headquarters and field locations identified below, and by reviewing the DAF's program documentation. More specifically, the inspection team:

- Reviewed records management policies, directives, and other documentation provided by the DAF and selected bases
- Interviewed representatives from the DAF RM program
- Guided the course of the inspection using a detailed checklist of questions based on Federal statutes and regulations, and NARA guidance
- Reviewed DAF responses to current and past annual Records Management Self-Assessments (RMSA), Senior Agency Official for Records Management (SAORM), and Federal Email Management reports.

LOCATIONS AND OFFICES VISITED

Headquarters, U.S. Air Force Units

- USAF SAORM (SAF/CIO Deputy Director), HAF Director of Information Management
- USAF Records Officer and Staff, USAF FOIA Officer
- HAF Portfolio Managers
- HAF Agency Records Manager and Staff
- SAF/AA, IA, IG, PA, AG/AFAA, and CDM
- HAF/A3, and A6

JB Andrews Units

- AFDW/Director of Staff, AFDW Agency Records Officer
- JB Andrews Base Records Manager and Staff
- PAG, 1 AS, 11 MDG, 11 AMDS, 11 DS, 11 MDOS, 11 MDSS, 89 CS, 89 OS, 89 MXG, 99 AS, 744 CS, 844 CG, and 844 CS
- AFLOA

Scott AFB Units

- ACC/CYSS Centralized Command Records Managers

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- Cloud Hosted Enterprise Services (CHES) Representative
 - AF Records Information Management System (AFRIMS) Team
 - HQs AMC/CCQ, FM, PA, JA, SE, SG, TE, A1, A3, A4, A5, and A9
 - Scott AFB Base Records Manager and Staff
 - 375th Communications Group Commander
 - 375 ABW Wing Staff Agencies
 - 375 MDG, 375 MG, 375 MSG, and 375 OG and aligned Squadrons from each Group
 - Scott AFB Base Staging Facility and Staging Facility Staff

Robins AFB Units

- AFRC Command Records Manager
- HQs AFRC/FM, IP, PA, SE, A1C, A3RA, A4R, and A9
- Robins AFB Base Records Manager and Staff
- Robins AFB Portfolio Managers and Program Managers
- AFMC WR-ALC/FM, OMO, QAX, and QASC
- 78 ABW/IG, 78 ABW/IP, 78 CSS, 78 FSS, 78 CEG, 78 CES, 78 ABW/IG78 SC, 402 CMXG, 402 EMXG, 402 MXSG, 402 AMXG, 402 SMXG, 406 SCMS, 409 SCMS, 410 SCMS, 411 SCMS, and 948 SCMS
- ACC 5 CCG Records Manager
- ACC 5 CSS, 5 CBSS, 51 CBCS, and 52 CBSS
- Robins AFB Base Staging Facility and Staging Facility Staff

JB San Antonio Units

- HQs AETC/CSS, JA, and A1
- AFPC Agency Records Manager
- HQs AFPC Program Managers, Portfolio Managers, and System Owners
- JB San Antonio Base Records Manager and RM Staff at Lackland AFB and Randolph AFB
- JB San Antonio FOIA Manager
- 12 OSS, 12 FTW/XP, 37 TRG, 59 MDSG, 502 CS, 502 FSS, 502 LRS, 802 FSS, and Det 1/2 AF
- Lackland AFB and Randolph AFB Base Staging Facilities and Staging Facility Staff

APPENDIX B

RELEVANT INSPECTION DOCUMENTATION

Air Force Guidance Memorandum to Air Force Instruction 33-322, "Records Management Program," April 26, 2018.

Air Force Guidance Memorandum to Air Force Instruction 33-364, "Records Disposition- Procedures and Responsibilities," May 23, 2018.

Air Force Guidance Memorandum to Air Force Manual 33-363, "Management of Records," June 2, 2017.

Air Force Instruction 33-321, Authentication of Air Force Records, August 3, 2011.

Air Force Enterprise Records Management (ERM) Solution Guide, September 2007.

United States Air Force Records Disposition Schedule, October 1, 2018.

Secretary of the Air Force Memorandum, "Reducing Additional Duties," August 18, 2016, and Fact Sheet: Reducing Additional Duties, August 19, 2016.

Secretary of the Air Force Memorandum, "Reducing Ancillary and Computer-Based Training," October 27, 2016, and Fact Sheet: Reducing Ancillary and Computer-Based Training, same date.

Secretary of the Air Force Memorandum, "Reducing Ancillary and Computer-Based Training - Phase II," April 27, 2018.

Air Force Instruction 38-206, "Additional Duty Management," May 6, 2014.

Air Force Instruction 90-201, "The Air Force Inspection System," December 7, 2017.

Air Force Instruction 35-107, Public Web and Social Communication, March 15, 2017, and Air Force Social Media Guide, 4th Edition, 2013.

Air Force Instruction 33-332, Privacy and Civil Liberties Program, Incorporating Change 1, November 17, 2016.

Department of Defense Manual 5400.07- Air Force Manual 33-302, Freedom of Information Act Program, April 27, 2018.

Department of Defense Instruction 5015.02, Incorporating Change 1, "DoD Records Management Program," August 17, 2017.

Department of Defense Instruction 5200.01, "DOD Information Security Program and Protection of Sensitive Compartmented Information," April 21, 2016.

Department of Defense Instruction 5015.02 Standard, "Design Criteria Standards for Electronic Records Management Software Applications," April 25, 2007.

Air Force Records Management Strategic Plan, December 11, 2018.

ACC CYSS/CYI Memorandum, "Semi-annual Records Management (RM) Trend Analysis," October 15, 2018.

NARA Report, "Records Maintenance and Disposition in Headquarters Air Force (HAF) Offices," January 2005.

Various Commander RM Plans and RM Training materials provided by the locations visited, different dates.

RM communications from the CRMs reporting the status of RM programs at bases across the AF, different dates.

APPENDIX C AUTHORITIES AND FOLLOW-UP ACTIONS

AUTHORITIES

- 44 U.S.C. Chapter 29
- 36 CFR Chapter XII, Subchapter B
- 36 CFR 1239, Program Assistance and Inspections

OTHER GUIDANCE

- OMB/NARA *Managing Government Records Directive* (M-12-18)
- OMB/NARA *Guidance on Managing Email* (M-14-16)
- Other NARA Bulletins currently in effect - <https://www.archives.gov/records-mgmt/bulletins>

STATUTES AND REGULATIONS

36 CFR Chapter XII, Subchapter B, specifies policies for Federal agencies' records management programs relating to proper records creation and maintenance, adequate documentation, and records disposition. The regulations in this Subchapter implement the provisions of 44 U.S.C. Chapters 21, 29, 31, and 33. NARA provides additional policy and guidance to agencies at its records management website - <http://www.archives.gov/records-mgmt/>.

At a high level, agency heads are responsible for ensuring several things, including:

- The adequate and proper documentation of agency activities (44 U.S.C. 3101);
- A program of management to ensure effective controls over the creation, maintenance, and use of records in the conduct of their current business (44 U.S.C. 3102(1)); and
- Compliance with NARA guidance and regulations, and compliance with other sections of the Federal Records Act that give NARA authority to promulgate guidance, regulations, and records disposition authority to Federal agencies (44 U.S.C. 3102(2) and (3)).

FOLLOW-UP ACTIONS

The DAF will submit to NARA a Plan of Corrective Action (PoCA) that specifies how the agency will address each inspection report recommendations, including a timeline for completion and proposed progress reporting dates. The plan must be submitted within 60 days after the date of transmittal of the final report to the head of the agency.

NARA will analyze the adequacy of the DAF's action plan, provide comments to the DAF on the plan within 60 calendar days of receipt, and assist the DAF in implementing recommendations.

The DAF will submit to NARA progress reports on the implementation of the action plan until all actions are completed. NARA will inform the DAF when progress reports are no longer needed.

APPENDIX D

ACRONYMS AND ABBREVIATIONS

ACC	Air Combat Command
ADLS	Advanced Distributed Learning Service
AETC	Air Education and Training Command
AF	Air Force
AF RDS	Air Force Records Disposition Schedule
AFAA	Air Force Audit Agency
AFB	Air Force Base
AFD	Air Force Directive
AFDPO	Air Force Departmental Publication Office
AFDW	Air Force District of Washington
AFI	Air Force Instruction
AFIA	Air Force Inspection Agency
AFIMPT	Air Force Information Management Publishing Tool
AFLOA	Air Force Legal Operations Agency
AFMAN	Air Force Manual
AFMC	Air Force Materiel Command
AMC	Air Mobility Command
AFPC	Air Force Personnel Center
AFRC	Air Force Reserve Command
AFRIMS	Air Force Records and Information Management System
ANG	Air National Guard
ARM	Agency Records Manager
BRM	Base Records Manager
CFR	Code of Federal Regulations
CIO	Chief Information Officer
COR	Chief of the Office of Record
CRM	Command Records Manager
CSAF	Chief of Staff of the United States Air Force
DAF	Department of the Air Force
DEOS	Defense Enterprise Office Solution
DISA	Defense Information Systems Agency
DOD	Department of Defense
DODI	Department of Defense Instruction
DODD	Department of Defense Directive
DRU	Direct Reporting Unit
EIS	Electronic Information System
FARM	Functional Area Records Manager
FOA	Field Operating Agency
FOIA	Freedom of Information Act
HAF	Headquarters Air Force
IG	Inspector General
ITIPS	Information Technology Investment Portfolio Suite
JA	Judge Advocate

JB	Joint Base
MAJCOM	Major Command
MICT	Management Internal Control Toolset
NARA	National Archives and Records Administration
OMB	Office of Management and Budget
OPR	Office of Primary Responsibility
ORL	Office Records List
PII	Personally Identifiable Information
PoCA	Plan of Corrective Action
RC	Records Custodian
RM	Records Management
RMSA	Records Management Self-Assessment
RO	Records Officer
SAORM	Senior Agency Official for Records Management
SAC	Self-Assessment Communicator
SecAF	Secretary of the Air Force
SOP	Standard Operating Procedure
STD	Standard
U.S.C.	United States Code
WR-ALC	Warner Robins-Air Logistics Center



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