



U.S. Department of Transportation

Senior Agency Official for Records Management (SAORM) 2015 Annual Report

Responsible Official

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1. What are the agencies, components, or bureaus covered by this report and your position as SAO?

The Department of Transportation (DOT) Records Management program is overseen by the Departmental Chief Information Officer (DOT CIO) who also serves as the Department's Senior Agency Official for Records Management (SAORM). The DOT CIO has appointed a Departmental Records Management Officer (DRMO) under the Associate CIO for IT Governance and Policy to lead the strategic implementation and cross-component oversight of DOT records management programs. Under the DRMO's leadership the department has created collaborative working relationship with the Operating Administrations (OA), the Office of General Counsel (OGC), and other key stakeholders to produce an operational Record Management (RM) program that leverages the knowledge and capabilities found across the Department in a sustained, rational, and effective manner.¹

The DRMO's primary responsibilities include development of frameworks, fostering collaboration across the Department, issuance of standards, and the promotion of sharing, acquisition, and implementation of common methodologies and technologies necessary to establish a Department-wide electronic records management program. The DRMO issues guidance and advocates for the use of shared services as well as the implementation of best practices to assist the OAs in meeting all records management requirements including but not limited to those set for in the Federal Records Act and the Management Government Records Directive (M-12-18). The DRMO develops guidance collaboratively with the OAs in support of the OCIO's vision of implementing enterprise-wide standards and solutions.

Operational records management responsibilities fall to Agency Records Officers (ROs) within the Office of the Secretary (OST)², the Office of the Inspector General (OIG) and the Department's OAs.³ In addition to providing Departmental oversight the DRMO has endeavored

¹ The term Records Management (RM) is used throughout this document and unless explicitly stated otherwise should be understood to include the entire records management lifecycle for all records including electronic records.

² The Operating Administration formerly known as the Research and Innovative Technology Administration (RITA), has been elevated to a Secretarial Office within the Office of the Secretary and is now known as the Office of the Secretary – Research (OST-R). For the 2014 Records Management Self-Assessment (RMSA) reporting cycle, OST-R will continue to report as a separate entity. Beginning with the 2015 reporting cycle, OST-R records management activities will be reported as part of the OST response.

³ For the reporting period the Department's Operating Administrations include; Federal Aviation Administration (FAA), Federal Highway Administration (FHWA), Federal Motor Carrier Safety Administration (FMCSA), Federal Railroad Administration (FRA), Federal Transit Administration (FTA), Maritime Administration (MARAD), National Highway Traffic Safety Administration (NHTSA)

to support the operational programs by identifying and working to resolve common issues through evaluation and research of best practices and lessons learned through participation in inter-agency collaboration groups including the FRON, NARA's Bi-monthly Records and Information Discussion Group (BRIDG), Capstone working group meetings, and Senior Agency Official meetings.

2. Is your agency going to meet the *Directive* goal to manage all email records in an accessible electronic format by December 31, 2016? (*Directive Goal 1.2*)

Yes

No

2a) Provide a list of actions your agency, components, or bureaus have taken to meet this goal. Include specific information on your progress regarding:

- *establishing formally approved email policies,*
- *use of any automated systems for capturing email,*
- *providing access / retrievability of your email,*
- *establishing disposition practices for agency email (either destroy in agency or transfer to NARA), and*
- *possible implementation of the Capstone approach for applicable agency email.*

The Department fully anticipates that all of its email systems will meet the Directive goal of managing both permanent and temporary email records in an accessible electronic format by December 31, 2016. To help meet the objectives of the Directive as well as to improve the Department's delivery of email services general, the DOT CIO initiated the transition to Department operated email environment to a Microsoft Office 365 in the Azure FedRAMP approved cloud solution. Included in this new environment will be an email archiving capability that supports all email records management lifecycle requirements including proper disposition.

The DRMO with the support of the Associate CIO for IT Shared Services (ITSS), OA records management staff, OGC, and other stakeholders is working to finalize the policy framework for the DOT's implementation of the NARA-approved Capstone approach for email management and retention. The DRMO has developed preliminary guidance on persona selection and has promulgated this guidance throughout the DOT records management community.

The DRMO is committed to leveraging and building upon best practices already in operation within the Department and where appropriate from other agencies to guide its ongoing work to establish common and consistent approaches to:

- Identifying Department-wide criteria for Capstone personas and support the establishment of OA specific criteria as necessary. This will provide a consistent application and implementation of the Capstone associated retention and disposition requirements. The DRMO will submit a consolidated set of persona criteria and associated individuals to NARA for approval,

- Establish common tools and processes for tracking and aligning named users to personas ensuring a consistent approach for maintaining necessary metadata over the records lifecycle,
- Conduct “table top” exercises to test persona based email processes under development, including culling rules and procedures, and
- Promulgate standard communications from the DRMO, and OA records officers to new employees, including senior officials, that identify individual records management responsibilities and provide resources for implementation and follow up.

2b) Provide a list of the actions your agency, components, or bureaus plan to take in 2016 to meet this goal.

The Department, under the direction of the DRMO, is implementing a Department-wide approach to managing email. This is a major effort requiring significant stakeholder involvement and strategic communication. During the course of the next twelve months the DRMO and records management community will work closely with the ITSS to;

- Establish new business practices and processes that map the workflows between IT, HR, and the RMO for Capstone management Deploy automated capture and management of email over the records lifecycle,
- Coordinate with the CIO Communications team to provide detailed explanation of the Capstone approach to email management and new technologies,
- Train administrative and end users on their respective roles regarding maintaining records and how to leverage the technical solution to meet those responsibilities,
- Develop and implement Capstone personas for each OA, and
- Share best practices and lessons learned among OAs, the Federal Records Officer Network (FRON), and others interested in this community of practice.

The DOT CIO recognizes that ultimately the Department is best served by a content based approach to email management. Accordingly the Department will continue to engage with the wider records management community to research, identify and potentially pilot and deploy additional technologies that enable a content based approach to managing all email electronically.

3. Has your agency taken actions to implement the 2014 amendments to the *Federal Records Act* requiring Federal employees to copy or forward electronic messages (including email, texts, chats, and instant messaging) that are federal records from their non-official accounts to official accounts within 20 days?

Yes No

Please provide a brief description of the actions taken, such as establishing policies and providing training.

The DRMO updated the Department’s RM Policy (Policy) to more effectively communicate the role that proper records management plays in the operations and governance of the Department. Additionally the Policy incorporates the requirements established in the update

to the Federal Records Act in 2014 and explicitly addresses employee responsibilities concerning the use of official email, text, chat, and instant messaging protocols and the management of any federal records contained therein.⁴ Once formal concurrence from all OAs and Secretarial Offices is completed and the Policy published, the DRMO will initiate the development of specific implementation instructions, tools, and training to promote its effective and consistent implementation. The DRMO is also working with OAs collectively and individually to ensure that all electronic communications records such a social media not already covered by a General Records Schedule are assessed and addressed in either a Department-wide or OA specific schedule.

4. Describe your agency’s internal controls for managing electronic messages (including email, texts, chats, and instant messaging) of the agency head and other executives (including appropriate advisers, and other senior management staff).

In July 2011 the DRMO issued Records Management 101 (RM101) training which addressed the basic requirements for records management for all staff; this material has been shared with FRON members and leveraged by multiple agencies as the basis for their comprehensive training programs. RM101 is required of all federal employees and is administered through an online training management system that allows the Department to track completion rates. In FY15 the DRMO updated the RM101 training to address the specific concerns associated with the use of electronic communications such as email, texts, chats, and instant messaging and the circumstances under which the use of these tool may result in the creation of and the necessary actions that must be taken to manage these records accordingly. All Department staff, including executives are required to take training within 90 days of on-boarding and biannually thereafter.

The DRMO is working with stakeholders across multiple disciplines within the Department to gather, standardize and promulgate best practices and standard operating procedures (SOP) including on and off-boarding procedures for all staff including the agency heads and executives.

5. Is your agency going to meet the *Directive* goal to submit records schedules to NARA for all existing paper and other non-electronic records by December 31, 2016? (*Directive Goal 2.5*)

Yes No

5a) Provide a list of the actions your agency, components, or bureaus have taken to meet this goal.

In 2012, the OAs with oversight from the DRMO conducted a comprehensive records inventory (Inventory) including non-electronic, paper, and electronic records using templates, processes, and reporting tools established by the DRMO. As appropriate OAs submitted schedules for all unscheduled records and are working with the NARA Appraisal Archivist to finalize their approval. The Department successfully submitted eight schedules and the

⁴ The following are specific examples of statements included in the Policy; “[Employees are required to] Forward a complete copy of the record to an official electronic messaging account of the officer or employee not later than 20 days after the original creation or transmission of the record” and “All employees will treat records created in official text messaging (MMS or SMS) accounts as messages created in a non-official electronic messaging system.”

DRMO is currently tracking four remaining proposed schedules through the approval process.

5b) Provide a list of the actions your agency, components, or bureaus plan to take in the future to meet this goal.

At this time the Department is confident that it has met the scheduling requirement for existing records and will continue to remain in compliance from this date forward. The Inventory is considered a living artifact and is continuously updated to reflect the Department's evolving records collection and systems. In the event that new records collections are identified they will be scheduled consistent with the Department policy and NARA guidance.⁵ The DRMO will continue to provide oversight of all scheduling activities including the development of Department wide schedules and tracking the status and coordinating as necessary with OAs and NARA to ensure that records are scheduled in a timely manner. The DRMO's role in overseeing the implementation of records schedules will also continue to evolve as technologies and resources permit.

6. Is your agency going to meet the *Directive* goal to manage all permanent electronic records in an electronic format by December 31, 2019? (*Directive Goal 1.1*)

Yes No

6a) Provide a list of the actions your agency, components, or bureaus have taken to meet this goal. Include specific information on your progress regarding:

- *establishing formally approved electronic records policies,*
- *use of any automated systems for capturing electronic records,*
- *providing access / retrievability of your electronic records, and*
- *establishing disposition practices for agency electronic records.*

The DRMO Strategic Plan includes specific goals and objectives that enable the Department to meet the Directive's mandates and includes a multi-pronged approach which address the unique electronic records management requirements for email, electronic information systems (EISs), as well as document artifacts. This allows the DOT to create guidance for each of the unique technical requirements that must be implemented to manage Email, EISs, and Electronic Documents and Artifacts throughout their lifecycle. Among the key initiatives are;

1. Development of OA specific strategic and tactical plans for EIS records management which include the following minimum elements required by the DRMO:
 - Integrated teams comprised of the following: Agency Records Officers, Records Liaisons, Information Collection Officers, Privacy Officers, Enterprise Architects, Capital Planning and Investment Control (CPIC) Coordinators.

⁵ Department Policy requires that schedules be applied (where available) or developed in the following order of precedence; 1) NARA General Records Schedule, 2) Department-wide schedules; 3) OA-specific schedule; 4) System/program schedule.

- Inventories of all EIS including a mapping of records and associated schedules contained therein.
- Processes to evaluate RM requirements within each EIS based on Departmental guidance, and
- Mechanisms to identify and request necessary resources to ensure ongoing compliance for all EIS.

The DRMO provides oversight and tracking of OA progress towards implementation of these plans, and works with stakeholders to remove roadblock, identify opportunities for multi-OA collaboration, and advocate for resources.

2. Leveraging Department-wide capabilities to serve as common platforms and methodologies. For example the DRMO and OGC partnered in a pilot of SharePoint recordkeeping capabilities which resulted in the successful business process reengineering of OGC file keeping and records management practices. The DRMO is in the process of gathering lessons learned and developing guidance to support the use of this technology throughout the Department.
3. The DOT has initiated the integration of records management requirements into the Information Technology (IT) governance processes including Federal Information Security Management Act (FISMA) cybersecurity authorization packages, Investment and Technical Review Boards, and Change Control Boards.

6b) Provide a list of the actions your agency, components, or bureaus plan to take in the future to meet this goal.

Working together through the Department's Records Management Working Group (RMWG) the Department and OAs will continue to evaluate internal and federal best practices to achieving the goal of managing all permanent electronic records electronically by the end of 2019. Practices currently under evaluation for standardization and implementation include;

- Integrating records management requirements into the IT system cybersecurity authorization process by leveraging records management related security controls identified by the National Institute of Standards and Technology (NIST).
- Inclusion of records management equities in system requirements development processes and change control boards to ensure that ERM requirements are captured and capabilities do not erode during system development and modifications activities.
- Analyzing SharePoint with additional Commercial Off the Shelf (COTS) tools for supporting ERM of document artifacts allowing better document management and reducing redundancy.
- Updating CPIC and IT Governance practices to include ERM requirements for EIS enabling lifecycle records management by programs, and

- Piloting the transfer of permanent records to NARA. This will allow both the Department and NARA to test formats as well as Extraction, Transfer, and Load (ETL) requirements and capabilities.

7. Please provide any insight to your agency's efforts to implement the *Managing Government Records Directive* and the transition to a digital government.

Provide a brief description, including any positive or negative outcomes, challenges, and other obstacles.

The Department is encouraged by the continued evolution and maturation of its records management program. The efforts undertaken thus far to implement the Directive have renewed interest and appreciation for the value of a strong and sustainable records management program. The Department continues to improve its automated records management capabilities providing greater assurance that records are known, scheduling requirements understood, and disposition operationalized thereby improving both compliance and reducing the Department's compliance risk. In addition to the capabilities discussed above the DRMO and the Department's Chief Privacy Officer have established new processes to ensure that the records retention statements in Privacy Act notices are consistent with approved NARA schedules; the improved communications between these programs promotes consistency among data/information management programs and ensures that privacy interests are taken into consideration during the development of records schedules and retention periods.

As with all programs, sufficient resourcing (personnel, technology, and time) continues to be a challenge to the Department's efforts to implement a robust records management program and address the ever evolving records and technology landscape. One area in particular that resourcing constraints have significantly impact is the digitization of paper records. While paper records have not been produced for many years and only pockets of these types of records still exist within OAs, their conversion to digital records is not possible without adequate and consistent funding. Furthermore, records management has for many years been treated as a collateral duty and not resourced from a personnel perspective in the same manner as other information management disciplines. The Department is proud of its efforts to support the professionalization of this important discipline and has instituted the use of standard job descriptions and qualifications, as well as the leveraging of OPM's new Records and Information Management job series when hiring new records officers. In addition the DRMO and DOT CIO continue to engage with leadership to ensure that the records management function within the OAs is aligned appropriately to facilitate proactive engagement in the development of IT systems and solutions and that all records management staff receive not only required but supplemental training and access to resources. Unfortunately, the staffing levels for the records management program are not sufficient to keep pace with the growth and change of the Department's records landscape and continued progress may not be sustainable over the long term.

A particular challenge that impacts both the Department and other agencies is the vendor community's lack of understanding of Federal records management requirements. The result is higher development and deployment costs unsustainable one-off solutions as

each agency establish different baseline requirements. The DOT recommends NARA more directly engage vendors, particularly those engaged in email provisioning and management and provide guidance and establish technical and functional requirements supportive of GRS 6.1/Capstone so that all agencies will have access to a core set of capabilities across platforms. The Department supports NARA's continued efforts to engage vendors and promote the inclusion of capabilities suitable to meet federal requirements into their products.

Modernization of requirements and processes including automation of electronic records management in a manner that is transparent to the end user continues to be a concern, particularly as the generational shift within the Department's workforce continues to accelerate. While all individuals within the Department bear a level of records management responsibility, it is not feasible nor appropriate that all individuals must be fully knowledgeable of NARA requirements and records schedules and be responsible for the execution of those retention and disposition requirements. The records manager role is not a familiar role for end users and as with any new or additional collateral duty is met with skepticism and resistance. For example, the utility and applicability of processes and techniques necessary to manage records in a paper-based world are called into question when accessing a records is achievable via a simple desktop search that does not require a formal file plan to determine a file's location. While appreciating the discipline and rigor that NARA's guidance and requirements bring to the table the Department encourages NARA to promote a more flexible approach that takes into consideration not only the needs of NARA in terms of the ingest and management of permanent records but also recognizes how records are created, used, and managed within agencies.

8. With regard to records management, is your agency preparing for the upcoming change in Presidential administration?

Yes No

8a) Provide a list of the actions your agency, components, or bureaus have taken to ensure records of departing senior officials will be appropriately managed during the upcoming change in Presidential administration.

Department wide standards for records management during employee off-boarding were established in FY2011 and are in use by all OAs. These include guidance on what material individuals may remove from the Department, the inventorying of records maintained by the individual, and the required sign-off by an appropriate records management official or designee on the custodial transfer of those records to another responsible party within the OA. The DRMO is working with OGC to update and re-issue previously issued memoranda entitled "Records Retention Advice for Departing Employees" to senior executives regarding their records management responsibilities. This activity is expected to be completed in late Q2FY16 and will be accompanied by other tools and guidance some of which like the *DOT Quick Reference Guide to Records Retention for Departing Employees* is currently available on the DRMO program office SharePoint site.

8b) *Provide a list of the actions your agency, components, or bureaus plan to take in the future to ensure records of departing senior officials will be appropriately managed during the upcoming change in Presidential administration, including ensuring that federal records are not improperly removed from the agency.*

The DRMO is working with ITSS to craft specific SOP for the capture, preservation, and protection of records to include email and records maintained on network and local drives and associated meta data in the custody of departing senior officials prior to the individual's departure. These SOP will be shared with OA records officers and CIOs to ensure the appropriate management of any records of these officials found in locally managed systems.

The DRMO is also collaborating with the Chief Information Security Officer (CISO) and the Office of Security, Intelligence, and Emergency Response to evaluate tools and establish processes that limit data loss prevention including the inappropriate transfer of electronic records outside the department. These efforts are in their preliminary stages and no operational solution has been identified or tested at time.