



## U.S. Department of Transportation

# Senior Agency Official for Records Management (SAORM) 2017 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 or Department) Records Management (RM)<sup>1</sup> program is overseen by the Departmental Deputy Chief Information Officer (DOT DCIO) who also serves as the Department's Senior Agency Official for Records Management (SAORM). The Department established a Departmental Records Management Office (DRMO) under the Associate CIO for IT Policy and Oversight to lead the strategic implementation and cross-component oversight of the Department's RM program. Under the DRMO's leadership the Department has established the Departmental Records Management Working Group (RMWG) and built collaborative working relationships with the Components<sup>2</sup>, the Office of the General Counsel (OGC), the Office of the Inspector General (OIG), and other key stakeholders to produce an operational program leveraging the knowledge and capabilities found across the Department in a sustained, rational, and effective manner.

In addition to fostering collaboration across the Department, the DRMO develops frameworks, issues standards and guidance, and promotes the common methodologies and technologies necessary to establish a Department-wide program for managing records in all formats. The DRMO promotes the Office of the Chief Information Officer's (OCIO) vision of enterprise standards and solution as well as of best practices in Component efforts to meet RM requirements including but not limited to those set forth in the Federal Records Act and the Managing Government Records Directive (M-12-18).

In addition to providing Departmental oversight the DRMO supports these 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 Federal Records Officer Network (FRON), NARA's Bi-monthly Records and Information Discussion Group (BRIDG), NARA's Electronic Records Management Working Group (ERMWG), the Federal Records Management Council (FRMC), and Senior Agency Official meetings.

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<sup>1</sup> 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.

<sup>2</sup> *Components* refers to the operational elements of the Office of the Secretary (OST), the Office of the Inspector General (OIG) and the Operating Administrations (OAs). For the reporting period, the Department's OAs include; the 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) Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Saint Lawrence Seaway Development Corporation (SLSDC).

**2. Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)**

- Yes  
 No

The RM Strategic Plan includes specific goals and objectives enabling the Department to meet the Directive's mandates. The Strategic Plan includes multi-pronged approaches addressing the unique electronic records management requirements for email, electronic information systems (EISs), as well as document artifacts. Key initiatives in the Strategic Plan include;

1. Development of Component strategic and tactical plans for managing EIS to include the following minimum elements:
  - Integrated teams comprised: Records Officers and Liaisons, Information Collection Officers, Privacy Officers, Enterprise Architects, IT Project Managers, and Capital Planning and Investment Control (CPIC) Coordinators,
  - Inventory of all EISs including a mapping of records and associated schedules contained therein,
  - Processes to evaluate RM requirements for each EIS based on Departmental guidance,
  - Mechanisms to identify and request necessary resources to ensure ongoing compliance for all EIS, and

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

2. Research of IT solutions to support more effective and efficient RM throughout the RM-lifecycle. The DRMO is focused on solutions that support distributed decentralized record repositories using metadata and content-based indexing. These tools may also be leveraged to identify redundant, obsolete, and trivial documents and artifacts eligible for disposal thereby reducing data storage requirements.
  - The DRMO has reviewed multiple products currently in use within the Department for non-RM functions such as SharePoint and IBM Watson, to determine their suitability for supporting ERM of document artifacts allowing better document management and reducing redundancy.
  - The DRMO has been engaged by NARA to establish a pilot to evaluate the Software Independent Archiving of Relation Database (SIARD) model. The pilot will test multiple formats for the extract and transfer of relational databases from the Department to NARA as well as standardize Extraction, Transfer, and Load (ETL) requirements and capabilities.
3. Integration of records management requirements into IT governance processes to ensure RM requirements are considered when acquiring and deploying EISs and electronic documents. To date the DRMO has successfully;
  - Integrated 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), and
  - Updated Component CPIC and IT Governance practices to include ERM requirements for EIS enabling lifecycle records management by programs.

4. Training for RM and non-RM staff to enable communication and collaboration between records and IT management staff to facilitate inclusion of RM requirements in EIS acquisition of EIS. Modules addressing inventories and retention and disposition requirements for EISs has been delivered to DOT IT Project Managers, Records Officers, and other program officials as well as the NARA ERMWG.

**3. Has your agency developed plans or taken actions to evaluate and implement the digitization of permanent records created in hard copy or other analog formats (e.g., microfiche, microfilm, analog video, analog audio)? (M-12-18 Goal 1.1)**

- Yes  
 No

Consistent with NARA's guidance that the M-12-18 Goal 1.1 does not mandate the digitization of permanent records that are not already available electronically the Department has pursued a business-driven approach to managing its data storage and access requirements for analog records. Working with our Federal Records Center (FRC) partners the DRMO conducted a cost benefit analysis of digitizing all paper holdings appraised as permanent throughout the FRC system. The total cost of ownership did not result in a positive cost avoidance benefit to the Department during the remaining retention period for records in DOT custody. Thus, the Department has decided not to digitize the permanent holdings.

The digitization cost model has since been expanded by the DRMO to include quality assurance/quality control activities necessary to ensure that digitized records capture a complete copy of converted records. The Department has applied the enhanced cost model to analyze other proposed digitization projects to confirm that they make both financial and operational sense. Where digitalization efforts have been initiated the Department has leveraged its RM inventory process to ensure that the records are aligned with an appropriate NARA approved records schedule.

**4. OMB M-17-22 required agencies to create reform plans that may result in re-organizations and the elimination of offices and/or functions. Where necessary, has your agency taken steps to ensure that recordkeeping requirements and other records management needs have been or will be accounted for and implemented when making these changes?**

- Yes  
 No

The DOT consistently takes steps to ensure recordkeeping and other records management needs are accounted for during reorganizations. For example, when the Build America Bureau was created under the OST the DRMO worked with the Federal Railroad Administration (FRA) and the new bureau to ensure the appropriate Railroad Rehabilitation and Improvement Financing (RRIF) records were properly transferred and accounted for within their respective OST and FRA Record Groups. The DRMO will continue to provide support to both original and inheriting organizations to ensure RM obligations are met during any transformation activities.

**5. Have you, as the SAORM, taken steps to ensure that your records management program has the strategic direction, support and resources it needs to be successful?**

- Yes  
 No

The Development of the Strategic Plan and this SAORM Report speak to the Department's commitment to the RM program.

**6. Have you, as the SAORM, ensured that all incoming and outgoing senior officials receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements.**

- Yes  
 No

The Department ensures that all officials, senior and non-senior, receive briefings and training related to documenting public service, the use of personal email and other recordkeeping requirements. The Department leverages existing on-boarding and off-boarding processes and resources in this outreach including but not limited to OCIO leadership teams, Office of General Counsel, the DRMO, and Component resources as appropriate.

**7. Is the records management program and related requirements included in your agency's Information Resource Management Plan or an equivalent information management plan? ([OMB Circular A-130, Managing Information as a Strategic Resource](#))?**

- Yes  
 No

The Department's RM Policy and Strategic Plan fully align with A-130 as confirmed during the FY17 NARA Inspection of the Department's program. The DOT DCIO ensures that RM is an integrated part of all Information Resource Management Plans.

**8. What policies, guidance or support do you need from NARA to ensure a successful transition to fully electronic recordkeeping? (NARA Strategic Plan. Goal 2.4)**

The Department fully supports NARA's [2018-2022 Strategic Plan](#) and looks forward to partnering in the development of processes and capabilities to support its execution. Considering "Robinson v. McDonald, 28 Vet.App. 178" the Department strongly recommends that in addition to, "providing Federal agencies with digitization guidance and success criteria for managing electronic records" as stated in Goal 2.4, NARA expedite the promulgation of digitization regulations under 44 USC 3302. This is especially time critical given NARA's Strategic Goal 3.2, "By December 31, 2022, NARA will, to the fullest extent possible, no longer accept transfers of permanent or temporary records in analog formats and will accept records only in electronic format and with appropriate metadata", will force digitization of analog records throughout the government.