1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.

The Department of Transportation (DOT) established the Departmental Records Management Office (DRMO) headed by the Department’s Senior Agency Official for Records Management (SAORM) within the Office of the Chief Information Officer (OCIO) in 2011. The DRMO leads the strategic implementation and agency-wide oversight of the Department’s Records Management (RM) program. The DRMO manages the Departmental Records Management Working Group (RMWG) and cultivates collaborative working relationships with the Components, the Office of the General Counsel (OGC), the Office of the Inspector General (OIG), and other key stakeholders to deliver an operational program leveraging the knowledge and capabilities found across the DOT in a sustained, rational, and effective manner. This organization has proven to be very beneficial to the Department meeting its RM goals.

2. Is your agency managing all permanent electronic records in electronic format as of December 31, 2019? (M-19-21, 1.1)

☐ Yes
☐ No

The Department has integrated RM requirements into its capital planning investment control (CPIC) process. In addition, all IT systems are reviewed for records scheduling and compliance during the annual cybersecurity authorization process.

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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 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).
3. Has your agency made progress towards managing all permanent records in an electronic format with appropriate metadata by December 31, 2022? (M-19-21, 1.2)

☑ Yes
☐ No

The DOT has taken a three-pronged approach to managing permanent electronic records. DOT has adopted the Capstone approach and follows GRS 6.1 for email management. For Mission Information Systems, the Department is utilizing a Software Engineering approach to document requirements and following best practices to incorporate extraction and transfer rules for permanent electronic records. For permanent electronic records dependent upon Commercial Off the Shelf (COTS) products, the Department is working with vendors to automate metadata capture and retention disposition.

4. Has your agency made progress towards managing all temporary records in electronic format? (M-19-21, 1.3)

☑ Yes
☐ No

For temporary records, the Department is following the same three-pronged approach noted above for permanent records.

5. Have you, as the SAORM, taken steps to ensure that your records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures? (M-19-21, 1.4)

☑ Yes
☐ No

The Department’s Records and Information Management (RIM) Strategic Plan developed and promulgated in 2015 directly aligned with M-12-18. The Department’s Records Management Policy (DOT Order 1351.28), promulgated in 2016, supports the strategic plan and directly aligns with the OMB A-130 update for Records Management. The DRMO has reviewed and confirmed that the Order aligns. The DRMO will issue an update to the RIM Strategic Plan to include new goals and actions that align with M-19-21.

6. If applicable, have you identified all agency-operated records centers and made plans to either close them before 2022, or have you submitted a request to NARA for an exception? (M-19-21, 1.3)

☐ Yes
☐ No
☑ Not Applicable
The DRMO is leading an effort to find alternative storage solutions for components to utilize when the Federal Record Centers are no longer available for records storage. This effort is expected to be completed and a contract in place by the end of December 2022.

7. **Does your agency have procedures that include documentation to ensure records of outgoing senior officials* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?**

   *Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions.

   ☑ 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.

8. **Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?**

   ☑ Yes
   ☐ No

Many of the COTS products in use today do not have automated controls for extraction of records. This requires agencies to build manual procedures to implement disposition rules.

9. **Do you need support from NARA to ensure a successful transition to fully-electronic recordkeeping?**

   ☑ Yes
   ☐ No

Information Technology (IT) support is usually acquired through GSA Schedule 70. A cross reference between the GSA Schedule 70 and Schedule 36 would enhance collaboration between the RM and IT communities by providing a single information source of all digital transformation vendors.

To support the SAORM’s ability to manage the Department’s federal record assets, the Department requests NARA enable data downloads from or Application Program Interfaces (API) into ARCIS and ERA. The manual processes required to transform the
current reports back into structured data for purposes of data analytics is highly inefficient, increases the likelihood of data transcription errors and is not necessary in the current digital environment. By providing data downloads the Department will be able to more rigorously review data accuracy in these systems and provide more complete analytical review across the OAs.

The DOT recommends that NARA declare all current schedules media neutral. This reduces the burden on both agencies and NARA to develop, review, and approve new schedules and eases the transition to fully electronic recordkeeping. This is the equivalent to the old “pen and ink” change that NARA performed prior to ERA.

The Department eagerly awaits the final Guidance on Digitization of Permanent Records in 2020 which will further assist agencies in transitioning to full electronic recordkeeping. This guidance will enable agencies to estimate resources required to convert permanent paper records into digital form for transfer to NARA.

It would also be useful for NARA to share the tools, strategies, and techniques that they have employed in their business practices to transition to a fully electronic recordkeeping environment.