



U.S. Department of Transportation

Office of the Chief Information Officer (OCIO)

Senior Agency Official for Records Management (SAORM)
2020 Annual Report



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1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately?

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)¹ program. The DRMO manages the Departmental Records Management Working Group (RMWG) and cultivates collaborative working relationships with the Components², 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. Has the COVID-19 pandemic changed any policies or practices related to records management at your agency?

- Yes
- No
- Do not know

COVID-19 did not affect any of the DOT records management policies or practices for records management at the Department.

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 Great Lakes Seaway (GLS, formerly known as the Saint Lawrence Seaway Development Corporation, SLSDC).

3. Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)

Yes

No

Do not know

Information Governance is closely integrated into the Systems Development Lifecycle and the Enterprise Program Management Lifecycle (EPML) at the Department. This approach has made the transition to meet Federal Information Technology Acquisition Reform Act (FITARA) requirements much easier. The Department-wide Software Engineering Support Blanket Purchase Agreement (SWES BPA) mandatory use vehicle incorporates standard templates for electronic records management of both retention requirements and disposition execution requirements. Additionally, the Department leverages the annual Privacy Risk Management assessment process to verify that records schedules, particularly those that cover Privacy Act records and other records containing personally identifiable information (PII) are appropriately associated and applied in IT systems.

4. 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

Do not know

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 utilizes a software engineering approach to document requirements and follows 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 works with vendors to automate metadata capture and retention disposition.

5. Has your agency made progress towards managing all temporary records in an electronic format by December 31, 2022? (M-19-21, 1.3)

Yes

No

Do not know

The Department follows the same three-pronged approach for temporary records as noted above for permanent records.

6. Is your agency investing resources in IT to support the transition to electronic recordkeeping?

- Yes
- No
- Do not know

Please see previous response regarding the use of SWES BPA and work with vendors to integrate automated records management capabilities into COTS products. The DOT is researching capabilities to automate the capture of required metadata. This includes the possibility of introducing robotic process automation (RPA) into various aspects of the records management program. Introducing RPA can reduce the burden on end-users in performing routine and repetitive electronic records management procedures.

7. To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)

- Yes
- No
- Do not know

The DRMO anticipates awarding a Department-wide BPA by Q3FY22 for non-FRC based storage. The Department is currently developing needs analysis, cost estimates, and alternatives analysis.

8. Does your agency have policies and procedures that include documentation to ensure records of newly appointed and 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
- Do not know

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.

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

- Yes
- No
- Do not know

We've begun successful transition to automating records schedule implementation however challenges exist in that many programs are reluctant to dispose of records even when the retention period has been met. This creates a cumbersome process of justifying rescheduling and/or having a program remove data that is no longer needed (e.g. PII data that has met the agreed to Privacy retention period). In addition, many of the COTS products in use today do not have automated controls for extraction of records. This requires agencies to build manual procedures by Database Administrators to implement disposition rules. An additional challenge is not all electronic record artifacts can utilize digital signatures. Some agencies have written into their authorities the use of wet signatures.

10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?

- Yes
- No
- Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):

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 Departments 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 which will further assist agencies in transitioning to full electronic recordkeeping. This guidance will enable agencies to estimate resources required to convert permanent paper/analog records into digital form for transfer to NARA.