



U.S. Department of Transportation

Office of the Chief Information Officer (OCIO)

Senior Agency Official for Records Management (SAORM)
2021 Annual Report



Provide the following information (required):

- Name of SAORM: Jack Albright
- Position title: DOT Deputy Chief Information Officer
- Address: 1200 New Jersey Ave. SE, Washington DC, 20590

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 related to records management at the DRMO.

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, Security, Privacy Officers, FOIA)

- 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. The DRMO is strategically located and reports directly to the Chief Information Security Officer within the Department's CIO office. It utilizes the tools deployed at the Department for managing risk and that enable information systems to get Authority to Operate (ATO). The DRMO leverages the National Institute of Standards and Technology (NIST) Security Controls, 800-53, to ensure retention and disposition requirements are being met with a system having an ATO.

4. Will your agency meet the goal to manage and preserve 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 the COTS vendor and other third-party automated tools to automate metadata capture, retention, and disposition. The Department is also investigating the potential for Robotic Process Automation and Machine Learning capabilities to be incorporated to meet the program's need and to reduce the burden for manual capture of any data and/or metadata.

5. Will your agency meet the goal to manage and preserve 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. Does your agency have plans to submit to NARA a request for an exception to the M-19-21 requirements before December 31, 2022?

- Yes
- No
- Do not know

Currently, the DRMO does not expect to request an exception. The DRMO asked how to get a Department-wide exception and was told that NARA would only evaluate exceptions on a component by component basis. Component agencies may find an operational requirement and will submit an exception on behalf of that component.

7. Is your agency utilizing the General Services Administration's Special Item Number for Electronic Records Management ([518210 ERM](#)) 6 to procure solutions to assist in transitioning to an Electronic Environment?

- Yes
- No
- Do not know

The Department currently leverages many of the vendors available within the Special Item Number (SIN) for a variety of services including electronic records management. The BPA noted in response to question 8 below expects to be competed among vendors on the SIN.

8. Has your agency developed plans to meet the requirements of M-19-21, 1.3 to store temporary records in commercial storage facilities by December 31, 2022?*

- Yes
- No
- Do not know

The DRMO anticipates awarding a Department-wide BPA by Q1FY23 for non-FRC based storage. The Department is currently developing needs analysis, cost estimates, and Federal Record Center's services replacement requirements, and alternatives analysis.

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. NARA is always working on ways we can make your role as the SAORM easier, improve how we interact with you and how you interact with each other. Do you have any suggestions?

- Yes
- No
- Do not know

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 continues to eagerly await 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.

The December 31, 2022 closing date for access to Federal Records Centers (FRCs) should be extended at least two years. Due to COVID-19 restrictions of access to buildings, the ability to physically execute any boxing up and transfer of records, temporary or permanent, to the FRCs has been virtually nonexistent. Component agencies at the Department have been unable to fully return to operations, including managing retention and disposition of temporary and permanent records through the utilization of FRC storage and services, throughout the United States. At the very least, NARA should provide a template for what needs to be included in an exception request for a level of consistency across component requests.