



U.S. Department of Transportation

Office of the Chief Information Officer (OCIO)

Senior Agency Official for Records Management (SAORM)
2022 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

Signature of SAORM:

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. In response to the COVID-19 pandemic, have any of the temporary adaptations to agency business processes become permanent improvements to the management and preservation of electronic records?

- Yes
- No
- Not applicable, no adaptations were needed
- Do not know

COVID-19 did not affect any of the DOT records management policies or practices related to records management.

3. Has your agency taken action to meet the goal to manage, preserve and transfer all permanent records in an electronic format with appropriate metadata by June 30, 2024? (M-19-21, 1.2 and M-23-07, 1.1 and 1.2)

- Yes

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).

- 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.

4. Has your agency taken action to meet the goal to manage and preserve all temporary records in an electronic format by June 30, 2024? (M-19-21, 1.3 and M-23-07, 1.3)

- Yes
- No
- Do not know

DOT components are in various stages of meeting the OMB & NARA M-19-21/M-23-07 goals. The recent extension of the deadlines to meet these goals was needed as most components were not physically available to manage hardcopy records during COVID; and also the Federal Record Centers were not fully accessible for transfer of records during this time.

5. Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 to close agency-operated records storage facilities and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities by June 30, 2024?

- Yes
- No
- Not applicable, all records are in electronic format
- Do not know

DOT is not currently using agency operated storage facilities as the Federal Record Centers have been fully utilized..

6. Does your agency have policies and procedures that incorporate records management into the information governance (IG) framework for information, data, and other agency information management? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, Records Management (RM) Staff, Security, Privacy Officers, and FOIA)

Note: The incorporation of records management into information governance is part of the framework covered by [OMB Federal Data Strategy - A Framework for Consistency \(M-19-18\)](#) as it provides a vision for managing and using federal data, along with recordkeeping requirements included in [OMB Circular A-130, Managing Information as a Strategic Resource](#).

- 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 Privacy Threshold 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.

7. Has your agency developed policies and procedures to ensure the capture and preservation of electronic messages, including when hardware or software is upgraded?

Note: Electronic messages means electronic mail and other electronic messaging systems that are used for purposes of communicating between individuals. Electronic messages that satisfy the definition of a federal record under the Federal Records Act are electronic records. This includes email, text messages, chat messages, voicemail, social media posts, and other similar applications. (See: [Email Management](#) and [CFR 1236: Electronic Records Management](#))

- Yes
- No
- Do not know

DOT is currently managing email messages under the Capstone approach (GRS 6.1) and opted not to include other forms of electronic messaging as part of the retention schedule at this time. DOT is aware of recent NARA update of regulations governing agency preservation of electronic messages that are determined to be records. At this time, DOT does not have an approved strategy to meet this requirement.

8. Is your agency using or exploring cognitive technologies to identify records and distinguish between temporary and permanent retention?

Note: Cognitive technologies generally describe automated technologies that can be applied to recordkeeping practices and procedures. These include Artificial Intelligence, Robotic Process Automation, Software Robot or Bot, and other machine learning technologies.

- Yes
- No
- Do not know

The Department is 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.

9. Do you as SAORM regularly oversee and evaluate the effectiveness of your records management program and its compliance with statutes and regulations?

Yes

No

Do not know

The DOT Records Management Directive (DOT Order 1351.28) requires the DRMO to conduct annual reviews of the DOT RM Program, which includes monitoring Components efforts to identify and address weaknesses in their respective RM programs. Based on these efforts, ad-hoc audits are to be conducted to ensure corrective actions are administered. DOT also uses the results of the annual NARA RM Self-Assessments to identify areas for improvement within each Component and/or DOT wide.

10. Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?

- Yes
- No
- Do not know

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 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.

The DOT recommends that NARA provide specific training series related to skills relative to M-19/21/M-23-07 implementation and mandates.

The DOT recommends that NARA provide tools to automate and assist in tracking Capstone Officials and the culling of emails records prior to transfer to NARA.

The DOT recommends that NARA provides Federal Record Center support service updates as it relates to the availability of transport of hardcopy record pick and deliveries. The delay of such resources, as identified as services in Component Interagency Agreements, causes interruption in the ability to efficiently transfer records in a timely manner and an undue burden in having to temporary stage boxes for pickup.

11. Do you have any suggestions for how NARA can better engage with you and your program in your role as SAORM?

- Yes
- No
- Do not know

DOT recommends that NARA hold re-occurring virtual meetings with SAORMs and Record Management Officers to discuss best practices and to brainstorm solutions to challenges in implementing electronic recordkeeping requirements. NARA should also consider providing samples of guidance that agencies could provide as part of an overall effort to transition to electronic recordkeeping and case studies of successful implementation of ERMS across the Federal government.