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Department of Defense  
Office of the Secretary of Defense  
Records Management Program

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*Records Management Inspection Report*

National Archives and Records Administration  
August 25, 2020

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**DEPARTMENT OF DEFENSE - OFFICE OF THE SECRETARY OF DEFENSE  
RECORDS MANAGEMENT PROGRAM**

**INSPECTION REPORT**

**INTRODUCTION**

The National Archives and Records Administration (NARA) is responsible for assessing the proper management of records in all media within Federal agencies to protect rights, assure government accountability, and preserve and make available records of enduring value.<sup>1</sup> In this capacity, and based on authority granted by 44 United States Code (U.S.C.) 2904(c)(7) and 2906, NARA inspects the records management (RM) programs of agencies to ensure compliance with Federal statutes and regulations and to investigate specific issues or concerns. NARA then works with agencies to make improvements to their programs based on inspection findings and recommendations.

NARA inspected the RM program of the Office of the Secretary of Defense (OSD) as part of a multi-year plan to inspect the RM programs of the Department of Defense (DoD) components. The purpose of this inspection was to examine how well OSD and its components comply with Federal records management statutes and regulations and to assess the effectiveness of its RM policies and procedures. In particular, it focused on the management of electronic records, including email, with emphasis being placed on policies, strategic planning, training, and oversight. Additionally, it sought to identify practices of interest to other DoD components and to the wider Federal RM community.

**OVERVIEW OF THE OSD RECORDS MANAGEMENT PROGRAM**

The OSD Records and Information Management (RIM) Program is aligned under the Washington Headquarters Service (WHS) and supports 31 major component defense agencies and field components, as well as 28 Federal advisory committees and task forces. The OSD RIM Program is part of the Records, Privacy, and Declassification Division, led by the OSD Records Administrator, and has two full-time staff members and four part-time contractors assigned. The program also has a network of Component Records Management Officers (CRMOs) and Records Liaisons (RLs) assigned as collateral duties throughout OSD.

OSD has a strong RIM program, especially in the areas of training and oversight. OSD recently updated its training and now offers a variety of role-based, tiered, and tailored training to all OSD military and civilian personnel and contractors in electronic and in-class formats. The training is mandatory and is tracked online and within each of its components. The OSD RIM Program's oversight and evaluation of the RM program is very effective, serving as a model that can be adopted by other DoD and Federal agencies.

OSD also manages programs to streamline records searches for Freedom of Information Act (FOIA) and legal discovery, and is piloting the use of commercial software products to analyze

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<sup>1</sup> 44 U.S.C. Chapter 29, <https://www.archives.gov/about/laws/records-management.html>.

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and clean up unstructured shared drives.

While most areas of the OSD RIM Program are compliant, there are some areas of the program that are partially compliant or noncompliant that require attention and improvement. This report makes 7 findings and 19 recommendations that will assist OSD in mitigating the risks to records and bring all areas of their RM program into full compliance.

## **FINDINGS AND RECOMMENDATIONS**

### **PROGRAM MANAGEMENT REQUIREMENTS**

#### **Finding 1: OSD's RIM directive and strategic plan have not been finalized.**

36 Code of Federal Regulations (CFR) 1222.26(e) requires Federal agencies to develop policies, procedures, and strategies for ensuring that records are retained long enough to meet programmatic, administrative, fiscal, legal, and historical needs as authorized in NARA-approved disposition schedules. In addition, Office of Management and Budget (OMB) Circular A-130 includes specific requirements related to strategic elements of RM programs that are to be included in the agency's Information Resource Management Plan.<sup>2</sup>

Two key documents, OSD's RIM directive and strategic plan, are currently under revision, and need to be finalized and distributed throughout OSD and its components. NARA acknowledges that the OSD RIM Program has limited resources and was focused on internal evaluations of the components over the past two years to bring them into compliance in preparation for the NARA inspection. That approach has been beneficial, with many components improving their RIM programs and minimizing the risk to records at the time of the inspection. The OSD RIM Program plans to use the results from the internal evaluations to revise Administrative Instruction (AI) 15, *OSD Records and Information Management Program*.

After the OSD RIM Program gathers more detailed information about DoD's planned implementation of Defense Enterprise Office Solutions (DEOS), it plans to finalize the *OSD RIM Strategic Plan, Fiscal Years 2019-2024*.<sup>3</sup> OSD's implementation of DEOS affects several of the goals in OSD's draft strategic plan for achieving the targets in OMB/NARA M-19-21.<sup>4</sup> Currently there are many unknowns about DEOS as the OSD RIM Program had no involvement with the planning and development of DEOS (see Finding 6), and more resources will be needed to achieve the goals established by their draft strategic plan.

*Recommendation 1.1: OSD must finalize and disseminate its RM directive. (36 CFR 1220.34(c))*

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<sup>2</sup> OMB Circular A-130, *Managing Information as a Strategic Resource*, July 28, 2016, <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A130/a130revised.pdf>.

<sup>3</sup> DEOS is an integrated, commercially-provided, cloud-based, enterprise commercial-off-the-shelf service being procured by the Defense Information Systems Agency (DISA) that offers communications, content, and RIM capabilities for DoD.

<sup>4</sup> OMB/NARA *Transition to Electronic Records* (M-19-21), <https://www.whitehouse.gov/wp-content/uploads/2019/06/M-19-21.pdf>.

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*Recommendation 1.2: OSD must finalize its RIM Strategic Plan. (36 CFR 1222.26(e), OMB Circular A-130, and NARA Bulletin 2017-02)*

**Finding 2: Some OSD components refused OSD RIM evaluations.**

36 CFR 1220.34(j) requires agencies to conduct formal evaluations to measure the effectiveness of RM programs and practices.

The 25 internal evaluations and five re-evaluations of OSD components conducted in the past two years have been very effective in identifying deficiencies, in developing plans to bring the RIM program into compliance with Federal statutes, and to minimize risk to OSD records. At the time of this inspection, several components were making progress correcting the deficiencies identified in their evaluation reports. Many stated the internal evaluations helped them to manage their records better. As identified in the evaluation reports, several of the components did not have a RIM program prior to their evaluation due to lack of resources and/or support for the program.

The inspection team found, however, that while many components were improving their RIM programs, one component refused to be evaluated by the OSD RIM Program. Other components resisted making improvements following their internal evaluation until after being notified that the NARA inspection team would visit them. The component that declined evaluation underwent reorganization two years ago and informed the inspection team that they refused to be evaluated because they knew they were not compliant. They said that one of their primary issues was the failure of the Defense Information Systems Agency (DISA) Joint Service Provider (JSP) to set up their records drive. Yet, two other components visited by the inspection team that underwent more recent reorganizations and who had received their evaluations had set up their own records drive and were making considerable progress with their corrective actions. The component that refused OSD's internal evaluation made no effort to prepare for NARA's inspection and continues to put their records at risk by not assigning them to the proper storage drive.

As stated above, OSD's internal evaluations of its RIM program are the best seen in DoD by the inspection team. They are effective and have proven to be beneficial to most OSD components. These evaluations must continue to ensure compliance with Federal requirements, and to ensure the improvements being made are sustained.

*Recommendation 2.1: OSD components that refused their internal evaluation must be evaluated in accordance with OSD AI-15 and work with the OSD RIM Program to develop plans of corrective action. (36 CFR 1220.34(j))*

*Recommendation 2.2: The OSD components that have been evaluated must complete the corrective actions identified in their reports providing progress reports to the OSD RIM Program until all actions are completed. (36 CFR 1220.34(j))*

**RECORDS SCHEDULING AND IMPLEMENTATION REQUIREMENTS**

**Finding 3: Many OSD records schedules are outdated and improperly applied by OSD components.**

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36 CFR 1224.10 requires Federal agencies to ensure Federal records are scheduled. This requirement applies to records in any medium and includes the periodic review and update of existing records schedules.

The OSD RIM Program has established a strong working relationship with its NARA appraisal archivist, periodically submitting new records schedules and updating older records schedules. At the time of the inspection, some schedules were in the process of being updated by the OSD RIM Program. But there are many more records schedules that were approved in the 1990s and earlier that need updating.

To move forward and meet Target 1.4 of OMB/NARA M-19-21, OSD components need to consistently review their records schedules and provide the OSD RIM Program with more accurate information about their records. A critical element of the scheduling process is gathering current information and descriptions from functional experts in the OSD components that create and maintain official records in various formats as required by 36 CFR 1225.12 (a-e) and 1222.26 (b). The inspection team found that many components improperly apply outdated records schedules instead of informing the OSD RIM Program that a new records schedule is needed, or that the existing records schedules including the approved retention no longer meet their business needs. The lack of records schedule reviews by some functional offices in the components, and providing sufficient information and updates of their records to the OSD RIM Program as required by AI-15, prevents OSD from revising many of its old records schedules and increases the risk for unauthorized disposals of records.

*Recommendation 3.1: Functional experts in OSD components must conduct a thorough review of their records schedules based on current information and description, including a review of the cutoff and disposition instructions, and provide updates to the OSD RIM Program as required by AI-15. (36 CFR 1224.10(c))*

*Recommendation 3.2: OSD components, as determined by the OSD RIM Program, must receive additional RM training for applying and implementing records schedules. (36 CFR 1224.10(e))*

*Recommendation 3.3: The OSD RIM Program must submit a plan or strategy to NARA for revising its old OSD records schedules. (36 CFR 1224.10(a))*

## **RECORDS DISPOSITION REQUIREMENTS**

### **Finding 4: Permanent records are not consistently transferred to the National Archives according to disposition instructions in NARA-approved records schedules.**

36 CFR 1235.12 requires agencies to transfer permanent records to the National Archives when the records are eligible for transfer based on the transfer date specified in a NARA-approved records schedule, or when the records have been in existence for more than 30 years.

During the inspection, it was noted that many components ignore the cutoffs and disposition dates of the records schedules and retain their records much longer than the approved disposition. While two of the components visited were actively working with the OSD RIM Program to revise the descriptions and adjust the retention dates of their records schedules, most components were not. Two common reasons given for retaining permanent records longer than

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their approved disposition were that the records cannot be transferred because of national security reasons, or that the component needed to retain the records “just in case” they had a use for them in the future. One of the components, which was established in the 1970s, has not transferred any of its permanent records to the National Archives.

OSD also maintains an electronic repository for permanent records known as the Executive Archives (EA). Established in 2008, the EA initially held scanned copies of permanent textual records and served as a reference tool. Today, it holds record copies of both scanned and born-digital records and serves as OSD’s primary electronic archive for permanent historical records. A comparison of OSD’s inventory of the EA with NARA’s list of records expected for transfer revealed that numerous permanent record series in the repository are overdue for transfer to the National Archives.

Part 3, section 3.2(d), of the President Executive Order 13526, Classified National Security Information, allows that “*the Archivist may require that classified records be accessioned into the National Archives when necessary to comply with the provisions of the Federal Records Act.*”<sup>5</sup> In addition, Federal requirements and procedures that allow agencies to retain permanent records after they are eligible for transfer for the conduct of regular agency business are codified in 36 CFR 1235.14. Yet, no component has submitted a request to the OSD RIM Program under this requirement. The inconsistent application of disposition instructions in records schedules, and retaining records longer than needed by the agency, negatively affects the history of the OSD and hinders OSD’s response to FOIA and litigation requests and Congressional inquiries.

*Recommendation 4.1: OSD components, as determined by the OSD RIM Program, must submit requests through their agency Records Officer to NARA to retain permanent records longer than the approved disposition. (36 CFR 1235.14)*

*Recommendation 4.2: OSD components must work with the OSD Records Administrator to transfer eligible permanent records to the National Archives in accordance with Federal regulations and DoD directives. (36 CFR 1226.22 and 1235.12)*

*Recommendation 4.3: OSD components should turn over any permanent records eligible for transfer to the OSD RIM Program for inclusion in the EA prior to transfer to the National Archives.*

*Recommendation 4.4: The OSD RIM Program must review the EA and transfer to the National Archives all permanent records overdue for transfer. (36 CFR 1226.22)*

## **RECORDKEEPING REQUIREMENTS**

**Finding 5: Ownership and responsibility for Non-Visual Information Public Affairs records is not clear and at risk for unauthorized disposal.**

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<sup>5</sup> The President Executive Order 13526, Classified National Security Information, December 29, 2009, <https://www.archives.gov/isoo/policy-documents/cnsi-eo.html>.

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36 CFR 1222.26(b) requires agencies to develop recordkeeping requirements that identify the office responsible for maintaining the record copies.

NARA has found over the course of the DoD multi-year RM inspection series that there is confusion and misunderstanding within the DoD Public Affairs (PA) community as to which office is responsible for maintaining the record copy of temporary PA non-visual information records.

The OSD RM inspection is the seventh inspection conducted by NARA involving 19 DoD agencies since 2017. The PA offices of these DoD agencies all claim that the Defense Media Activity (DMA) is responsible for maintaining all of their PA records because the records are maintained in databases and on websites managed by DMA. DMA, however, stated that it is responsible only for the visual information (VI) records of the PA offices as identified in records schedule DAA-0330-2013-0014, and that the non-visual information records created by each of the PA offices is their responsibility.<sup>6</sup> DMA does provide services to the PA offices through the Defense Visual Information Distribution Service that stores all of the visual information used by PA offices throughout DoD. Department of Defense Instruction (DoDI) 5040.02, *Visual Information*, provides policies, procedures and responsibilities for managing VI records.<sup>7</sup> Responsibility for PA non-visual information records belongs with each office, according to DMA, but is not covered in the DoD instruction.

The OSD RIM Program informed the inspection team during the meeting with DMA that guidance was provided in the past to PA offices clarifying records ownership and that PA offices were responsible for the record copy of their non-visual information records. Meetings with PA offices during previous DoD inspections, however, shows that confusion and misunderstanding still exists. The lack of clear policy and guidance for ownership of PA non-visual information records significantly increases the risk for unauthorized disposal where PA offices may be deleting records they believe DMA is responsible for keeping.

*Recommendation 5.1: The Assistant to the Secretary of Defense for Public Affairs (ATSD-PA) must issue clear policy and guidance to DoD PA Offices and DMA regarding the ownership and responsibility for the record copy of PA non-visual information records. (36 CFR 1222.26(b))*

*Recommendation 5.2: DoD PA Offices must review their recordkeeping practices to determine if accidental deletions occurred and report unauthorized disposition results to their appropriate DoD agency Records Officer and Senior Agency Official for Records Management for further reporting to NARA. (36 CFR 1230.14)*

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<sup>6</sup> Records Schedule DAA-0330-2013-0014, DoD Visual Information Schedule, [https://www.archives.gov/records-mgmt/rcs/schedules/departments/departments-of-defense/office-of-the-secretary-of-defense/rg-0330/daa-0330-2013-0014\\_sf115.pdf](https://www.archives.gov/records-mgmt/rcs/schedules/departments/departments-of-defense/office-of-the-secretary-of-defense/rg-0330/daa-0330-2013-0014_sf115.pdf).

<sup>7</sup> DoDI 5040.02, *Visual Information*, dated April 20, 2018, <https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/504002p.pdf?ver=2019-04-04-075535-323>.

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## **ELECTRONIC RECORDS MANAGEMENT REQUIREMENTS**

### **Finding 6: RM is not incorporated or integrated into OSD information life cycle processes for the electronic information systems (EIS) of OSD components serviced by JSP.**

36 CFR 1236.6(b), OMB Circular A-130, and DoDI 5015.02 require the integration of RM and preservation considerations into the design, development, enhancement, and implementation of EIS.<sup>8</sup> These requirements also include the migration of information and data from legacy systems into new EIS, and applies to all EIS that contain records, not just records management applications (RMA) and electronic records management systems (ERMS).

The OSD Records Administrator and most of the CRMOs in the components are not involved with, nor has RM been integrated into, OSD information life cycle processes and stages for the design, development, and implementation of EIS, including the migration of records into newer systems. The only exceptions are the Defense Advanced Research Projects Agency (DARPA), where the CRMO is also the Chairman of the EIS Configuration Control Board, and the Defense Information School (DINFOS) that has its own IT department and works well with the CRMO.

Most of OSD receives its IT support from the DISA JSP, which replaced the WHS Enterprise Information Technology Services Directorate in 2015. While the consolidation of IT services under JSP has proven to be effective and provides many efficiencies across OSD, it does not offer system information life cycle services to OSD to integrate Federal, OMB, and DoD RM requirements into the design or modification of EIS. This deficiency was confirmed by JSP during the first site visit. To fill the gap, the OSD RIM Program and the CRMOs rely on system program managers to keep them informed of their systems. In addition, the OSD RIM Program uses other sources such as the Defense Information Technology Portfolio Repository (DITPR), System of Records Notices (SORN), and Privacy Information Assessments (PIA) to identify and determine what EIS are in use and whether the systems contain records that need to be scheduled. Of these sources, only DITPR provides information about data migration or when systems are decommissioned. But, DITPR does not contain information for all of OSD's systems.

The lack of involvement and integration of RM into IT processes was evident when the inspection team received a briefing about the DEOS from the Air Force Judge Advocate Office. Many DoD agencies are counting on DEOS to provide the RM capabilities they lack to meet the OMB/NARA M-19-21 requirement that all Federal agencies will ensure that all Federal records are created, retained, and managed in electronic formats with appropriate metadata. The Department of the Air Force provided its RM requirements for DEOS through DISA and plans to pilot the solution once it is made available. RM requirements from the OSD RIM Program and other DoD agencies planning to implement DEOS were gathered after the selection phase and were not included. The briefing received by the NARA inspection team from the Air Force Judge Advocate Office was the OSD RIM Program's third briefing regarding DEOS, but the program has had no involvement or input for the solution that will manage OSD's electronic records. In addition, there are major differences between the Air Force's approach to scheduling records

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<sup>8</sup> DoDI 5015.02, *DoD Records Management Program*, dated February 24, 2015, <https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/501502p.pdf?ver=2019-01-24-111201-200>.



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compared with OSD, the other Services, and the DoD independent agencies, that could impact the overall use and success of DEOS.

Failure to comply with the Federal, OMB, and DoD requirements for EIS places electronic records at risk for mismanagement, loss or unauthorized disposition, and increases the OSD's risk to potential fines, lawsuits and penalties, as well as Congressional and media attention.

*Recommendation 6: The DoD CIO must involve DoD Records Officers in DoD agencies serviced by JSP, and fully incorporate RM into information life cycle processes and stages for the design, development, enhancement, and implementation of EIS to ensure compliance with OMB Circular A-130 and DoDI 5015.02. (36 CFR 1236.6(b))*

**Finding 7: Current practices and technologies do not protect all email record from potential loss.**

NARA Bulletin 2014-06 provides policy and guidance for Federal agencies to manage permanent email in electronic format.<sup>9</sup> In addition, NARA issued the *Success Criteria for Managing Email Records in Compliance with the Managing Government Records Directive M-12-18*.<sup>10</sup> In May 2018, NARA approved OSD's General Records Schedule 6.1 Capstone implementation form, which identifies the OSD Capstone Officials whose emails are permanent.<sup>11</sup> Capstone Officials email is managed and handled by designated personnel known as trusted agents.

During the meeting with the Executive Secretariat, the Secretary of Defense Communications Team (SecDef Comm) and the trusted agents, who are responsible for implementing the Capstone Schedule for the Secretary of Defense and 24 other OSD Capstone Officials, did not have a clear understanding of the Capstone Schedule. They were unclear as to whether the emails are permanent or temporary or even record copies. In addition, they stated they have back-up tapes of emails and some correspondence from previous Secretaries going back many years. In some cases, the software to read the content of these back-up tapes is no longer available. They were unaware as to whether the unreadable emails and some correspondence were damaged and/or corrupted. SecDef Comm stated they had offered to transfer the back-up tapes to NARA, but that NARA would not accept them. In the same conversation, they indicated that these tapes contained temporary records. The inability to determine what is on these tapes, whether the emails are temporary or permanent, or accessible at all, is a major concern. These emails could be important historical records documenting actions at the highest levels of OSD. Determining their disposition status should be a priority for SecDef Comm. Damage or loss of the emails should be reported to NARA if they are record copies.

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<sup>9</sup> NARA Bulletin 2014-06 *Guidance on Managing Email*, <https://www.archives.gov/records-mgmt/bulletins/2014/2014-06.html>.

<sup>10</sup> Email Specific Guidance and Resources, <https://www.archives.gov/records-mgmt/email-management/email-guidance-and-resources.html>.

<sup>11</sup> GRS 6.1-0330-2017-001, <https://www.archives.gov/files/records-mgmt/rcs/schedules/departments/department-of-defense/office-of-the-secretary-of-defense/rg-0330/grs-6-1-0330-2017-0001-c.pdf>.

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The inspection team also learned that prior to the inspection, SecDef Comm did not respond to requests from the OSD RIM Program to meet and receive Capstone implementation guidance and to help them prepare for the NARA inspection. The risk potential for lost or damaged email and correspondence in this office is very high and needs to be addressed by OSD.

*Recommendation 7.1: The SecDef Comm Team must work in collaboration with the OSD RIM Program to address the issue of Capstone implementation in the Executive Secretariat. (36 CFR 1220.34 (f))*

*Recommendation 7.2: The trusted agents for each Capstone official, with guidance from the OSD RIM Program, must determine whether the stored back-up tapes contain official records not captured elsewhere in paper or electronic format, and attempt to recover any official records where it is the only copy. (36 CFR 1220.34(i))*

*Recommendation 7.3: The OSD RIM Program must report to NARA any lost, corrupted, or damaged records from this office. (36 CFR 1230.14)*

*Recommendation 7.4: The SecDef Comm Team must work with the OSD RIM Program to establish controls and mechanisms that protect the Secretary's records to ensure the records can be retrieved, presented, interpreted, and used for as long as needed to conduct agency business, and to transfer permanent records to the National Archives when they meet their disposition. (36 CFR 1236.10(e) and 1236.12(b))*

*Recommendation 7.5: The SecDef Comm Team must work with the OSD RIM Program to develop migration strategies to avoid the loss of records due to media decay or technology obsolescence. (36 CFR 1236.14)*

## **ADDITIONAL CONCERNS**

### **Better OSD component cooperation is needed with the OSD RIM Program.**

44 U.S.C. Chapter 31 requires the heads of agencies to ensure that there is adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency (44 U.S.C 3101). It is also required to establish and maintain an active, continuing program for the economical and efficient management of the records of the agency (44 U.S.C. 3102). 36 CFR Chapter XII, Subchapter B, regulates how this is to be accomplished. Failure by agency components to cooperate with their Records Office negatively affects the RM program and puts the organization at risk. Had better cooperation been given to the OSD RIM Program prior to the inspection, two of the seven findings, and 7 of the 19 recommendations could have been avoided. More involvement by senior management will help the applicable components with making the necessary improvements.

## **NOTEWORTHY PRACTICES**

During the site visits, a few noteworthy practices were found that would be of interest and benefit to other DoD components and other Federal agencies.

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## **EVALUATIONS**

OSD's process and methodology for conducting internal RM evaluations is the best NARA has seen of any DoD agency inspected to date. They are thorough, effective, and the feedback from many of the components evaluated has been positive. In addition, the continuous tracking of corrective actions and follow-up helps ensure improvements are made, and that the components meet Federal requirements and minimize risk to records. The NARA inspection team is recommending that OSD's evaluation process be included in an assessment NARA is conducting in Fiscal Year 2020 to be used as a model for other Federal agencies to consider.

It should also be noted that three of OSD components, specifically the Office of the Under Secretary for Defense Comptroller, DINFOS, and DARPA, also conduct internal component evaluations in the form of audits or staff assistance visits. Their efforts are an example for other OSD components to emulate.

## **THE EXECUTIVE ARCHIVES**

The EA has proven to be an effective and efficient tool for capturing the records of the current and former Secretary and Undersecretaries of Defense and locating records for FOIA or legal purposes. The EA has also been expanded to capture permanent records created by other OSD components. During the course of a previous NARA inspection in 2010 in which the EA was reviewed, 23 collections were found comprising 6 million pages of documents from former Secretaries and Undersecretaries as well as Task Forces and Commissions.<sup>12</sup> Ten years later, EA comprises over 1,000 collections and 80 million pages of documents, with 10 million pages being added to the repository each year. This growth is an indicator of the effectiveness of the repository.

Currently, use of the EA by OSD components is voluntary, and the collection of records occurs on an ad hoc basis at the request of a component. However, expanded use of the EA to store and manage permanent electronic records for use and eventual transfer to the National Archives would help better position OSD to meet Targets 1.1 and 1.2 of OMB/NARA M-19-21. The configuration and use of the repository serve as an excellent model for other agencies, and its use should be expanded to other OSD components.

Prior to any expansion of the EA, NARA would recommend that the OSD RIM Program:

- Develop specific policies and procedures for the transfer and storage of records into the archive by OSD components; and
- Develop a mechanism within EA to show how and when dispositions have been applied to records maintained in the repository.

NARA's review of the inventory of the EA showed that records series lacked information as to whether dispositions are being applied to the permanent and temporary records maintained in the

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<sup>12</sup> NARA Inspection Report, Records Management in the Office of the Secretary of Defense, December 2010, <https://www.archives.gov/files/records-mgmt/pdf/osd-inspection.pdf>.

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repository or the scheduling status of unscheduled records transferred to the archive.<sup>13</sup> Adding this information will help identify which dispositions are overdue or require action. These additional improvements to the operation of the repository will increase its effectiveness in the handling of permanent records and the fulfillment of the requirements of OMB/NARA M-19-21.

### **WORKING RELATIONSHIP WITH OSD HISTORIAN**

The OSD RIM Program and the OSD Chief Historian's Office have established an excellent working relationship to ensure valuable records are captured, retained, and transferred to NARA as required. The RM guidance, records search, and research services provided by the OSD RIM Program offer value to the Historian's Office and other OSD components. It serves as a model for other DoD agencies where NARA has found no working relationship or conflicting responsibilities with the Historian's Office.

### **USE OF RMAs OR ERMS**

Of the 20 offices visited, five of the components have implemented or are implementing an RMA solution, which enables them to better manage their electronic records. The five components are: the Directives Division (WHS/ESD/Directives); the Acquisitions Directorate (WHS/AD); DMA; DARPA; and the Defense POW/MIA Accounting Agency (DPAA). Of these, the Directives Division has built their document life-cycle process (creation, workflows, and final storage) into their RMA. This is now a mature process that is user friendly, effective, and compliant with NARA regulations.

Each of the five components have also customized or are customizing their RMAs, and all have developed or are developing business processes and rules to meet Federal requirements. These five components are better positioned to meet the requirements in OMB/NARA M-19-21 and can be used as examples for the other OSD components that use structured shared drives requiring labor intensive tasks to properly maintain electronic records.

## **CONCLUSION**

Overall, the OSD RM program has many strengths and noteworthy practices of benefit to other DoD components and Federal agencies. The internal evaluations conducted in OSD have also helped most of the components identify deficiencies, which are being corrected, bringing the OSD RM program into compliance with Federal regulations. The concentration of oversight activities for this small team over the past two years has, however, impacted other areas of the program that need attention, such as policy and strategic planning, scheduling, and the disposition of records. Continued senior leadership and additional support for the program, along with the plan of corrective action for this inspection, will help OSD make the necessary improvements and bring the program into full compliance. Follow-up actions required for OSD and NARA are included in Appendix C.

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<sup>13</sup> The preponderance of records in the EA are permanent. There are some instances of temporary or unscheduled records in the archive.

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## **APPENDIX A INSPECTION PROCESS**

### **OBJECTIVE AND SCOPE**

The objective of this inspection was to determine how well OSD complies with Federal records management statutes and regulations and to assess the effectiveness of its RM policies and procedures.

### **METHODOLOGY**

NARA carried out this inspection by visiting the OSD Headquarters and OSD Components January - March 2020. The inspection team:

- reviewed records management policies, directives, and other documentation provided by OSD;
- interviewed program staff;
- used a detailed checklist of questions based on Federal statutes and regulations, and NARA guidance; and
- reviewed responses to current and past annual Records Management Self-Assessment, Senior Agency Official for Records Management, and Federal Email Management reports.

### **OFFICES VISITED/INTERVIEWED**

- Records Privacy and Declassification Division (WHS/ESD/RPPD)
- Joint Service Provider (JSP)/Defense Information Systems Agency (DISA)/DoD CIO
- Executive Archives (RPPD QualX)
- Acquisitions Directorate (WHS/AD)
- Directives Division (WHS/ESD/Directives)
- OSD Chief Historian and Deputy Historian
- Executive Secretary of the Department of Defense
- Office of the Chief Information Officer (DoD CIO)
- Office of the Under Secretary of Defense Comptroller (OUSD C)
- Office of the Chief Management Officer (OCMO)
- Office of Net Assessment (ONA)
- Office of the Under Secretary of Defense for Research & Engineering (OUSD R&E)
- Office of the Under Secretary of Defense for Policy (OUSD P)
- Office of the Under Secretary of Defense for Personnel & Readiness (OUSD P&R)
- Assistant to the Secretary of Defense for Public Affairs (ATSD PA)
- Defense Media Activity (DMA)
- Defense Information School (DINFOS)
- Defense Advanced Research Project Agency (DARPA)
- Defense POW/MIA Accounting Agency (DPAA)
- Office of the Chief Data Officer, Data Insights Directorate (OCMO/CDO)

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## **APPENDIX B**

### **RELEVANT INSPECTION DOCUMENTATION**

The inspection team received and reviewed copies of the following documents from the OSD and most of the OSD components:

- OSD and component RM program organizational charts.
- RM program strategic plans, goals, and objectives.
- RM policies, directives, standards and other RM related tactics/issuances, including the handling of permanent records in all formats.
- RM policies for managing permanent and temporary email, to include the use of personal email accounts.
- RM policies regarding social media, to include authorized social media tools and procedures for capturing electronic records.
- Documentation of RM involvement in the approval and design of new systems and other decision making around systems changes including decommissions.
- Documentation of electronic RM objectives incorporated into agency information resource management programs and objectives.
- Plans for managing permanent electronic records in electronic formats by 31 December 2019.
- System documentation for Records Management Applications (RMA) planned or in use.
- Migration and metadata standards.
- Inventories of scheduled and unscheduled electronic systems.
- List of unscheduled records, to include electronic, special media, and paper records.
- Inspection or evaluation reports of RM practices within OSD and component programs and offices, subsequent reports, and/or follow-up actions related to the program.
- Documentation of RM training.

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## APPENDIX C AUTHORITIES AND FOLLOW-UP ACTIONS

### AUTHORITIES

- 44 U.S.C. Chapter 29
- 36 CFR Chapter XII, Subchapter B
- 36 CFR 1239, Program Assistance and Inspections

### OTHER GUIDANCE

- OMB/NARA *Transition to Electronic Records* (M-19-21)
- Other NARA Bulletins currently in effect - <https://www.archives.gov/records-mgmt/bulletins>

### STATUTES AND REGULATIONS

36 CFR Chapter XII, Subchapter B, specifies policies for Federal agencies' records management programs relating to proper records creation and maintenance, adequate documentation, and records disposition. The regulations in this Subchapter implement the provisions of 44 U.S.C. Chapters 21, 29, 31, and 33. NARA provides additional policy and guidance to agencies at its records management website - <http://www.archives.gov/records-mgmt/>.

At a high level, agency heads are responsible for ensuring several things, including:

- The adequate and proper documentation of agency activities (44 U.S.C. 3101);
- A program of management to ensure effective controls over the creation, maintenance, and use of records in the conduct of their current business (44 U.S.C. 3102(1)); and
- Compliance with NARA guidance and regulations, and compliance with other sections of the Federal Records Act that give NARA authority to promulgate guidance, regulations, and records disposition authority to Federal agencies (44 U.S.C. 3102(2) and (3)).

### FOLLOW-UP ACTIONS

OSD will submit to NARA a Plan of Corrective Action, to include applicable findings and recommendations, that specifies how the agency will address each inspection report recommendation, including a timeline for completion and proposed progress reporting dates. The plan must be submitted within 60 days after the date of transmittal of the final report to the head of the agency.

NARA will analyze the adequacy of the action plan, provide comments to OSD on the plan within 60 calendar days of receipt, and assist OSD in implementing recommendations.

OSD will submit to NARA progress reports on the implementation of the action plan until all actions are completed. NARA will inform OSD when progress reports are no longer needed.

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**APPENDIX D**  
**ACRONYMS AND ABBREVIATIONS**

AI	Administrative Instruction
ATSD-PA	Assistant to the Secretary of Defense for Public Affairs
CFR	Code of Federal Regulations
CIO	Chief Information Officer
CRMO	Component Records Management Officer
DARPA	Defense Advanced Research Projects Agency
DEOS	Defense Enterprise Office Solutions
DINFOS	Defense Information School
DISA	Defense Information Systems Agency
DITPR	Defense Information Technology Portfolio Repository
DoD	Department of Defense
DoDI	Department of Defense Instruction
DMA	Defense Media Activity
DPAA	Defense POW/MIA Accounting Agency
EA	Executive Archives
EIS	Electronic Information System
ERMS	Electronic Records Management System
FOIA	Freedom of Information Act
IT	Information Technology
JSP	Joint Service Provider
NARA	National Archives and Records Administration
OMB	Office of Management and Budget
OSD	Office of the Secretary of Defense
PA	Public Affairs
PIA	Privacy Information Assessments
RIM	Records and Information Management
RL	Records Liaison
RM	Records Management
RMA	Records Management Application
RO	Records Officer
SecDef Comm	Secretary of Defense Communications
SORN	System of Record Notice
U.S.C.	United States Code
VI	Visual Information
WHS	Washington Headquarters Service





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