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Records Management Training

Assessment Report

National Archives and Records Administration
August 2018

Records Management Training Assessment Report

INTRODUCTION

The National Archives and Records Administration (NARA), based on authority granted by [44 United States Code \(U.S.C.\) 2904\(c\)](#), 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. Under this authority, NARA conducts records management oversight of Federal agencies, including agency inspections and assessments. An *assessment* is a multi-agency evaluation of a specific topic, issue, or activity affecting records management processes, procedures, or policies.

In the third quarter of FY 2018, NARA conducted an assessment on Records Management (RM) training to measure compliance with [36 CFR 1220.34\(f\)](#), [Office of Management and Budget \(OMB\) Circular No. A-130: Managing Information as a Strategic Resources](#), and [NARA Bulletin 2017-01: Agency Records Management Training Requirements](#), and to gather data on Federal agency implementation, best practices and insights regarding RM training.

For this assessment, NARA sent email notification letters (see Appendix A for sample notification letter) to 16 Senior Agency Officials for Records Management (SAORM), informing them that their agency was selected to participate in the assessment based on their agency's responses to the 2015 and 2016 Records Management Self-Assessment (RMSA). Of the 16 agencies, 14 were able to participate in the assessment (see Appendix B for list of participating agencies).

Each agency was asked to provide NARA with all agency RM training materials (i.e., PowerPoint presentations, handouts, RM website links, and e-learning modules) and agency RM policies and directives, and to facilitate either a 3-hour onsite visit or teleconference interview.

NARA used the RM Training Assessment Checklist (see Appendix C) to assess whether or not agencies provided RM training specific to the needs of certain groups of staff, and that their basic RM training content satisfied all of the requirements listed in NARA Bulletin 2017-01. Additionally, NARA used the RM Training Assessment Questionnaire (see Appendix D) to learn more about each agency's practices and procedures related to RM training.

This report summarizes all of the information gathered during the assessment site visits, interviews, and review of submitted materials.

SUMMARY AND ANALYSIS

During this assessment NARA had the opportunity to engage with agencies that had as few as 2 employees and as many as 375,000 employees, and with agencies that had one office in Washington, DC, and those that had more than 40 offices throughout the world. The diversity of these 14 agencies offered valuable insight into the variety of experiences, challenges, and best practices related to RM training within the Federal Government.

Overall, NARA found that all 14 of the agencies offered some sort of RM training. Half of these agencies have a formal RM training program that offers periodic basic RM training to all agency staff, with only 6 out of these 7 agencies requiring employees to complete basic RM training annually. Smaller agencies, and agencies that have several office locations, indicated that they had more of an informal approach to training staff on RM requirements (i.e., training was administered in small group or one-on-one settings).

SUMMARY OF DATA FROM THE RM TRAINING ASSESSMENT CHECKLIST AND QUESTIONNAIRE

The tables below provide a general summary of the information NARA gathered from the RM training assessment checklist and questionnaire.

TABLE 1. SUMMARY OF INFORMATION FROM THE RM TRAINING ASSESSMENT QUESTIONNAIRE

	Number of agencies
Offers basic RM training	7
Basic RM training required annually	6
Basic RM training completion is tracked	6
Training is administered in person and/or online	8
Training administered via Learning Management System (LMS)	8
Training materials as a PowerPoint Presentation	6
Training materials available on RM website	4
Conducts entrance and/or exit RM training of Senior Officials (SO) or Political Appointees (PA)	6
SO/PA have additional RM training	1
Used NARA Bulletins and other NARA guidance to create basic RM training	6
Used Code of Federal Regulations (CFR) to create basic RM training	3
Used Agency policies/directives to create basic RM training	1
Agency RM Program office involved in developing basic RM training	6
Agency Training Program office involved in developing basic RM	2

training	
Agency Information & Technology (IT) Program office involved in developing basic RM training	2
Agency General Counsel involved in developing basic RM training	1
Consulted with a learning and development professional	2
Created specific RM training for SO/PA	4
Agency has developed measures to determine the effectiveness of basic RM training	3

TABLE 2. SUMMARY OF RM TRAINING OFFERED TO SPECIAL GROUPS

Group	Number of agencies
Senior level agency officials and political appointees	5
Records professionals at all levels within the organization (i.e., agency records officers, managers and liaisons/custodians)	5
Office managers and supervisors	2
Acquisition, contracting, and procurement personnel	3
Attorneys engaged in litigation or advising on records or access to information issues	4
Personnel developing and managing IT systems and applications	3
Continuity of Operations and Disaster Preparedness (COOP) personnel that manage mission essential records	4

TABLE 3. SUMMARY OF AGENCY BASIC RM TRAINING CONTENT

Basic RM training content	Number of agencies
Defines Federal records	9
Covers records in all formats, including electronic records and communications from email, instant messaging and social media platforms or apps	9
Describes how RM supports the agency's mission and business processes, and public access to government information	9
Provides an overview of government-wide and agency-specific RM policies and recordkeeping requirements	10
Explains legal responsibilities for creation, maintenance, and disposition of Federal records	9
Describes the stages of the records management lifecycle, to include the creation, maintenance and use, disposition, and the difference between temporary and permanent records, all of which are	10

addressed in the agency's disposition schedule	
Describes how to distinguish records from non-record and personal materials	10
Describes how records are maintained and filed in the agency	8
Describes records schedules, its legal authority and where to find agency's schedules	9
Describes the General Records Schedules (GRS) and how to apply them	8
Explains why it is important to follow records schedules or file plans	8
Describes how records schedules or files plans are implemented and updated	5
Explains how legal holds (sometimes called records freezes) and the discovery phase of litigation affect records handling, retention, and disposition	6
Describes how and where to store agency Federal records	7
Describes how agency IT systems are used for records management (if applicable, how to use agency records management technologies)	8
Describes how to manage record and non-record materials in email, social media, and other electronic messages, including the statutory requirement that all emails and other electronic messages constituting a record that are sent or received using a personal or non-official account must be copied or forwarded into agency recordkeeping systems within 20 days of creation or receipt	7
Describes what to do with record and non-record materials when an employee leaves the agency	6
Describes what to do when records are removed, lost, or destroyed without proper authorization	6
Describes where to get more information about records management (e.g., websites, manuals, agency's records schedule, file plans, and Agency Records Officer (ARO) contact information)	6
Provides agency contacts for RM questions	6
Includes information regarding retiring records to storage, transferring permanent records, and destruction of records	7
RM training requires trainees to practice what they are learning using job relevant scenarios	8
RM training includes an assessment of learning	8

RM TRAINING CHALLENGES

Some of the obstacles that agencies identified related to the development and effective administration of RM training were:

- Lack of funding
- Non-existent legislative or executive regulations mandating that Federal employees must complete RM training annually
- Ineffective support or buy-in from senior/executive management
- Lack of recognition of RM as a mission-critical function
- Lengthy or inefficient approval process for new policies, procedures, directives, and or training
- Navigating rules, regulations and procedures related to unionized employees
- Access to compatible IT systems throughout the organization
- High turnover of employees or large population of temporary assignment employees
- Creating training in multiple languages and ensuring that all overseas employees receive basic RM training.

BEST PRACTICES

During this assessment NARA identified several best practices that make for a robust RM training program. Some of these best practices include, but are not limited to:

- Tracking and sending notifications to program managers, supervisors, and AROs to identify employees that do not complete training
- Establishing on-boarding and exit RM training for SO/PA
- Administering RM training when onboarding new employees
- Providing RM training in multiple formats (e.g., users manuals, PowerPoint presentations, and electronic learning modules)
- Having Human Resources notify RM Program staff whenever employees start or leave the agency
- Including examples of records that are specific to the agency's mission and work
- Creating multiple RM courses or modules to train employees on varying aspects of agency-specific recordkeeping requirements
- Using expertise from multiple offices or programs within the agency to develop RM training.

AGENCY FEEDBACK

NARA asked each agency to identify what NARA could do to support them with RM training and in RM overall. Support or guidance that agencies would like to see from NARA related to RM training include:

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- Develop legislative/executive regulation mandating that Federal employees must complete RM training annually
 - Create a comprehensive basic RM training template that agencies can easily customize for their own use
 - Create more comprehensive guidance on how to develop a RM training program
 - Provide a comprehensive list of reputable RM training programs and additional learning resources from private corporations or professional organizations for RM personnel at agencies
 - Create a directory of contact information of Federal agencies who have successfully implement RM training programs that satisfy all RM regulations
 - Coordinate with agency IT departments to ensure that agencies can successfully access NARA's online RM training resources
 - Create a web link to open training rather than going through a portal or LMS
 - Provide more specific online RM training.

Support or guidance that agencies would like to see from NARA regarding RM in general:

- Proactively reach out to agencies to ensure that RM requirements are being followed
 - Create strategic guidance that offer action items agencies could take to successfully meet NARA guidance and RM requirements
 - Provide guidance and actual examples of how RM program staff can engage senior management level employees to gain resources and support RM program
 - Create an Excel spreadsheet of all RM statutes, regulations, guidance, executive memos and any regulatory RM requirements
 - Publish a NARA RM subject matter experts directory on NARA's web page
 - NARA should push for agencies to use the [308 Records and Information Management Occupational Series](#) throughout the Government
 - Create specific guidance on generic or acceptable language agencies should use when developing agency records schedules, with special focus about language regarding cutoffs for temporary records and permanent transfers
 - Create a training module about writing agency records schedules
 - Provide information that outlines how NARA and other agencies are achieving goals in electronic RM and publish specific instructions on how to successfully manage electronic records
 - Publish documentation that explains how NARA manages sensitive records once in NARA's custody
 - Create guidance on what information should qualify for the various levels of security classification
 - Establish a NARA RM Support Hotline.
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CONCLUSION

RM Training is critical to every agency's RM Program because it is the primary way agencies ensure that employees have the necessary skills to effectively manage Federal records in accordance to all RM regulations. When agency staff are properly trained and RM regulations are successfully enforced agencies are better able to use their records to assess the impact of its programs, reduce redundant efforts, save money, and share knowledge within and across their organizations. Additionally, effective and efficient RM is the backbone of open Government.

Agency Records Management Training Requirements

- All agency personnel with email accounts or IT network resource access *must* complete records management training within 60 days of employment and must complete annual refresher training.
- Agencies *must* provide records management training to all agency personnel that create, receive, access, or use Federal records on behalf of the agency, regardless of whether those individuals have email accounts or IT network access.
- Agencies *must* develop records management training content specific to the practices and policies of the organization.
- Agencies *must* incorporate the following minimum required content areas into annual records management training:
 1. Define Federal records.
 2. Describe how records management supports the agency's mission and business processes, and public access to government information.
 3. Provide an overview of government-wide and agency-specific records management policies and recordkeeping requirements.
 4. Explain legal responsibilities for creation, maintenance, and disposition of Federal records.
 5. Describe the stages of the records management lifecycle, to include the creation, maintenance and use, disposition, and the difference between temporary and permanent records, all of which are addressed in the agency's disposition schedule.
 6. Describe how to distinguish records from nonrecord materials and personal materials.
 7. Describe how records are maintained and filed in the agency, including:
 - a. What is a records schedule, its legal authority, and where to find their agency's schedules;
 - b. Why it is important to follow records schedules or file plans; and

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- c. How records schedules or files plans are implemented and updated.
 8. Explain how legal holds (sometimes called records freezes) and the discovery phase of litigation affect records handling, retention, and disposition.
 9. Describe how and where to store agency Federal records.
 10. Describe how agency information technology (IT) systems are used for records management (if applicable, how to use agency records management technologies).
 11. Describe how to manage record and nonrecord materials in email, social media, and other electronic messages, including the statutory requirement that all emails and other electronic messages constituting a record that are sent or received using a personal or non-official account must be copied or forwarded into agency recordkeeping systems within 20 days of creation or receipt.
 12. Describe what to do with record and nonrecord materials when an employee leaves the agency.
 13. Describe what to do when records are removed, lost, or destroyed without proper authorization.
 14. Describe where to get more information about records management (e.g., websites, manuals, agency's records schedule, file plans, and agency Records Officer contact information).
 15. Provide agency contacts for records management questions. Include information for the field and/or headquarters points of contact for retiring records to storage, transferring permanent records, destruction of records, and answering records management questions.
- Agencies *must* provide targeted records management training to political appointees, senior agency officials, and senior executives upon their arrival and departure, and within three to six months prior to a presidential administration change. This may include conducting entry and exit interviews with your agency's records management staff, IT liaisons, and general counsel to ensure that records are preserved and protected.

Even though all of the agencies offered some sort of RM training, there is room for improvement, like developing training content that covers all topics identified in NARA Bulletin 2017-01, ensuring that RM training is taken annually and tracked, and establishing on-boarding and exit RM training for all agency employees.

Each agency in this assessment was eager to find out how they could either formalize or improve their RM training program and those agencies that were discovered to be non-compliant with NARA Bulletin 2017-01 have been individually notified of their need to address areas of non-compliance.

Agencies that had recently worked with NARA on a RM issue indicated that NARA's staff were extremely helpful and successfully resolved their RM issue. NARA intends to use what was learned during this assessment to further assist Federal agencies in successfully meeting RM regulations and requirements.

APPENDIX A
SAMPLE NOTIFICATION LETTER

[mm/dd/2018]

RE: NARA Records Information Management Training Assessment

Dear [Agency SAORM]:

The National Archives and Records Administration (NARA) requests your agency's participation in an assessment of your Records Management (RM) Training Program. We selected your agency based on your responses to the 2015 and 2016 Records Management Self-Assessment (RMSA).

An *Assessment* is an evaluation of a specific RM topic, issue or activity affecting RM processes, procedures and or policies. Assessments are conducted through on-site meetings, teleconferences, surveys, or any combination as necessary, in accordance with NARA's statutory authority to review agency records management programs (44 U.S.C. 2904(c)). This assessment will measure your agency's compliance with 36 CFR 1220.34(f) and NARA Bulletin 2017-01.

Assessments are useful for both NARA and Federal Agency RM programs to quickly assess records and information management practices and inform new ways of thinking about RM guidance, policy, training and tools. Unlike inspections that focus on an entire RM program, assessments focus on a specific RM topic and are completed within 60 days from the request for participation. Upon completion of our assessment, we will compose a report detailing treatment of the topic, best practices and areas for improvement. Our goal is to work with Federal agency RM programs to capture the most effective, efficient and innovative RM practices and tools.

We plan on conducting this Assessment at your location, lasting approximately 2-3 hours. Assessment questions are based on the requirements set forth by NARA Bulletin 2017-01. NARA values your commitment to records management and appreciate your support for this important endeavor.

Please have your agency point of contact notify [NARA POC] by [mm/dd/2018] with your preferred assessment interview date and the RM training materials requested below.

Requested documentation:

1. All RM training materials (i.e. PowerPoint presentations, handouts, RM website links, and e-learning modules).
2. Agency RM Policies and Directives.

Sincerely,

LAURENCE BREWER
Chief Records Officer
for the U.S. Government

APPENDIX B
LIST OF SELECTED AGENCIES

	Department/Agency	Component	Participated	Site Visit
1	Administrative Office of the United States Courts	Judicial Branch	No	NA
2	American Battle Monuments Commission		Yes	No
3	Barry Goldwater Scholarship Foundation		Yes	No
4	Central Intelligence Agency		Yes	Yes
5	Department of Defense	Office of the Inspector General	Yes	Yes
6	Department of Homeland Security	United States Coast Guard	Yes	Yes
7	Department of Homeland Security	United States Immigration and Customs Enforcement	Yes	Yes
8	Department of Homeland Security	Federal Emergency Management Agency	Yes	Yes
9	Department of the Treasury	Departmental Offices	Yes	Yes
10	Department of Veterans Affairs		Yes	Yes
11	Executive Office of the President	Office of Management and Budget	No	NA
12	Federal Election Commission	Federal Election Commission	Yes	No
13	National Archives and Records Administration		Yes	Yes
14	National Science Foundation		Yes	Yes
15	Nuclear Waste Technical Review Board		Yes	Yes
16	United States Tax Court		Yes	No

APPENDIX C
RM TRAINING ASSESSMENT CHECKLIST

		RM Training Assessment Checklist
Yes	No	Requirement
		Specialized RM Training. Does you Agency provide RM training specific to the needs of the following groups:
		Senior level agency officials and political appointees
		Records professionals at all levels within the organization, Agency Records Officers, managers and liaisons/custodians
		Office managers and supervisors
		Acquisition, contracting, and procurement personnel
		Attorneys engaged in litigation or advising on records or access to information issues
		Personnel developing and managing IT systems and applications
		Continuity of Operations and Disaster Preparedness personnel that manage mission essential records
		Content. Does your basic RM training content:
		Define Federal records.
		Cover records in all formats, including electronic records and communications from email, instant messaging and social media platforms or apps?
		Describe how RM supports the agency's mission and business processes, and public access to government information.
		Provide an overview of government-wide and agency-specific RM policies and recordkeeping requirements.
		Explain legal responsibilities for creation, maintenance, and disposition of Federal records.
		Describe the stages of the records management lifecycle, to include the creation, maintenance and use, disposition, and the difference between temporary and permanent records, all of which are addressed in the agency's disposition schedule.
		Describe how to distinguish records from nonrecord and personal materials.
		Describe how records are maintained and filed in the agency, including:
		What is a records schedule, its legal authority and where to find their agency's schedules
		Describe the General Records Schedules (GRS) and how to apply them.
		Why it is important to follow records schedules or file plans; and
		How records schedules or files plans are implemented and updated.
		Explain how legal holds (sometimes called records freezes) and the discovery phase of litigation affect records handling, retention, and disposition.
		Describe how and where to store agency Federal records.
		Describe how agency information technology (IT) systems are used for records management (if applicable, how to use agency records management technologies).

	Describe how to manage record and non-record materials in email, social media, and other electronic messages, including the statutory requirement that all emails and other electronic messages constituting a record that are sent or received using a personal or non-official account must be copied or forwarded into agency recordkeeping systems within 20 days of creation or receipt.
	Describe what to do with record and non-record materials when an employee leaves the agency.
	Describe what to do when records are removed, lost, or destroyed without proper authorization.
	Describe where to get more information about records management (e.g., websites, manuals, agency's records schedule, file plans, and agency Records Officer contact information).
	Provide agency contacts for records management questions.
	Include information regarding retiring records to storage, transferring permanent records, and destruction of records.
	Does the training require trainees to practice what they are learning using job relevant scenarios?
	Does the training include an assessment of learning?

APPENDIX D

RM TRAINING ASSESSMENT QUESTIONNAIRE

Process

1. Does your agency provide basic Records Information Management (RIM) training to all personnel that create, receive, access, or use Federal records on behalf of your agency? (i.e. Federal employees, contractors, volunteers, etc.)
2. How often are personnel required to complete RIM training?
3. Is completion of RIM training tracked? If yes, how is it tracked and by whom?
4. How is RIM training delivered? (i.e. online, in-person or both)
5. What delivery mechanism is used to get RIM training to agency personnel? (e.g. e-learning platform, website/intranet, email etc.)
6. What media is the RIM training content in? (e.g. hardcopy/softcopy documents, PowerPoint, e-learning module etc.)
7. What is the process for conducting entrance/exit RIM training for Senior Officials (SOs) and Political Appointees (PAs)?
8. Are SOs/PAs required to participate in special or additional RIM training unique to their positions?

Development

9. What sources of information were used to create the Basic RIM training content?
10. Who designed/developed the Basic RIM training?
11. Describe the development process for the Basic RIM training?
12. Did your Agency consult with a Learning and Development Professional to create the Basic RIM training?
13. What are the agency's costs associated with creating, maintaining and presenting all RIM training?
14. What obstacles, if any, has your agency encountered while developing and getting the Basic RIM training to staff?
15. Did your agency create specific trainings for SOs/PAs?

Evaluation

16. Has your agency developed measures to determine the effectiveness of the Basic RIM training? If yes, describe these measures?
17. What is the level of response from SOs/PAs for the Basic RIM training?

Agency Feedback

18. What kinds of guidance or support, in RIM training, would your agency like to see from NARA?
19. What other feedback does your agency have for NARA regarding anything related to Records Management?



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