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DEPARTMENT OF HOMELAND SECURITY
Records Management Program

Records Management Inspection Report

National Archives and Records Administration
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EXECUTIVE SUMMARY

The National Archives and Records Administration (NARA) is responsible for assessing the proper management of records in all media to protect rights, assure government accountability, and preserve and make available records of enduring value within Federal agencies.¹ In this capacity, NARA inspects the records management 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.

A successful and compliant program requires senior management support at the highest levels; a clear definition of program objectives, responsibilities, and authorities; allocation of sufficient resources to administer the program; assignment of the program to an appropriate office within the agency's organizational structure; continuous training for records management staff; and regular internal evaluations to monitor compliance and program effectiveness.

Departmental records management can be very complex due to the large size of Departments, differences between components, competing priorities, and limited resources. In order to successfully implement a Departmental records management program, communication and coordination between the Department and its component agencies are essential. Each component agency has its own mission and manages its records in accordance with its policies and procedures. It is the responsibility of the Departmental records management program to develop Department-wide policies, directives, standards, procedures, guidance, and strategies that enable the components to design and implement compliant and effective records management programs.

NARA is interested in how well Departmental records management programs operate and incorporate records management coordination into organizational business lines and culture. In order to understand these processes more fully, we examined how the Departmental Records Officer (DRO) works with component Agency Records Officers (AROs), and how Departmental business lines plan and implement standards, policies, procedures, and other aspects of a records management program.

In 2016, NARA inspected the records management program at the Department of Homeland Security (DHS). DHS is the fifth in a series of inspections of Departmental records management programs. NARA conducted this effort under the authority granted it by 44 United States Code (U.S.C.) 2904(c)(7) and 2906 to inspect records management programs and practices of Federal agencies.

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

In addition to being part of the multi-year project to inspect each executive branch Department, NARA was specifically interested in inspecting DHS because:

- DHS is a very diverse Department and many of the components operate independently of the Department.
- DHS was created from various entities that were either independent agencies or components of other Departments. NARA is interested in how the DHS Records and Information Management (this term includes the Departmental RIM Program and all element RIM programs) programs have handled the challenges and changes over the course of 14 years.
- The Office of Management and Budget (OMB)/NARA *Managing Government Records Directive* (M-12-18)² established goals for managing email and electronic records by Federal agencies. NARA is interested in what DHS's RIM Program is doing to meet these goals.

KEY FINDINGS AND RECOMMENDATIONS

The Departmental Records and Information Management (RIM) Program has been working to establish a Department-wide, coordinated, and cohesive RIM program for several years. The DHS RIM Program is coordinating some notable projects to improve RIM across the Department. NARA is encouraged by these developments and looks forward to supporting the DHS in these ongoing activities. However, there are challenges to the success of Departmental efforts. This report identifies those challenges and makes recommendations to assist the DHS RIM Program in overcoming them.

This report contains nine findings and thirteen recommendations (See Appendix C). Listed below is a high level summary of the key findings.

- DHS records management policies, procedures, and strategic plans have been in draft form for several years. These must be revised, approved, and issued.
- Department wide email polices are out of date or in draft form. DHS must revise, approve, issue, implement and keep current Department-wide email policies.
- DHS has plans for a Department-wide Electronic Records Management System (ERMS) to handle electronic records and email management which is not fully funded and does not have a contingency plan in the event that funding is not forthcoming. DHS should adopt a coordinated contingency plan for managing electronic records in the event that the ERMS is not fully funded.
- There is no Department-wide strategy for retention scheduling for email records. The operational components are not independently scheduling email records due to the funding questions related to a Department-wide ERMS. DHS must decide on its approach to email management and submit to NARA GRS 6.1 form NA-1005 or retention schedules for approval.

² OMB/NARA Managing Government Records Directive (M-12-18), released August 24, 2012, <https://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>.

- Current DHS email use and storage strategies do not allow for effective retention and retrieval of email. DHS must update current email storage systems to meet retention and retrieval requirements.

To ensure implementation of the recommendations, as part of the inspection process, DHS will be required to develop a Plan of Corrective Action (PoCA) that specifies how the Department will address each report recommendation, including a timeline for completion of the corrective action(s) for each recommendation. NARA will analyze the proposed remedial actions and work with DHS to ensure the adequacy of its PoCA. Upon approval of the PoCA, NARA looks forward to continuing a cooperative relationship with DHS and assisting with the implementation of the recommendations.

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**DEPARTMENT OF HOMELAND SECURITY
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.³ In this capacity, NARA inspects the records management programs of agencies to ensure compliance with the Federal Records Act and its implementing 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.

Departmental records management can be very complex due to the large size of Departments, differences between components, competing program requirements, and limited resources. In order to successfully implement a Departmental records management program, communication, and coordination between the Department and its component agencies are essential. Each component agency has its own mission and manages its records in accordance with its policies and procedures. It is the responsibility of the Departmental records management program to develop Department-wide policies, directives, standards, procedures, guidance, and strategies that enable the components to design and implement compliant and effective records management programs.

NARA is interested in how well Departmental records management programs operate and incorporate records management coordination into organizational business lines and culture. In order to understand these processes more fully, we examined how the Departmental Records Officer (DRO) works with component Agency Records Officers (AROs) and how Departmental components plan and implement standards, policies, procedures, and other aspects of a records management program.

In 2016, NARA inspected the records management program at the Department of Homeland Security (DHS). DHS is the fifth in a series of inspections of Departmental records management programs. NARA conducted this effort under the authority granted by 44 United States Code (U.S.C.) 2904(c)(7) and 2906 to inspect records management programs and practices of Federal agencies.

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

BRIEF AGENCY DESCRIPTION

Established by the Homeland Security Act in November of 2002, the Department of Homeland Security is responsible for America's security and prosperity by addressing its energy, environmental, and nuclear challenges through transformative science and technology solutions.

The Secretary and Under Secretary of DHS oversee the operations of seven major components and 21 support components, which include four directorates each with highly varied missions:

- **Operational Components**

- United States Citizenship and Immigration Service (USCIS)
- United States Customs and Border Protection (CBP)
- United States Coast Guard (USCG)
- Federal Emergency Management Agency (FEMA)
- United States Immigration and Customs Enforcement (ICE)
- Transportation Security Administration (TSA)
- United States Secret Service (USSS)

- **Directorates**

- National Protection and Programs Directorate (NPPD)
- Science and Technology Directorate (S&T)
- Directorate for Management (MGMT)
- Intelligence and Analysis Directorate (I&A)

The vision of DHS is a homeland that is safe and secure against terrorism and other hazards both at home and overseas. The fulfillment of this mission requires the combined efforts of more than 240,000 employees in jobs that range from aviation and border security to emergency response, from cybersecurity analysis to chemical facility inspections. The five missions of DHS are:

- Prevent Terrorism and Enhance Security
- Secure and Manage our Borders
- Enforce and Administer our Immigration Laws
- Safeguard and Secure Cyberspace
- Strengthen National Preparedness and Resilience

The day-to-day fulfillment of these missions enables DHS to achieve its primary mission to protect the nation from internal and external threats.

INSPECTION OBJECTIVE

The objective of this inspection was to determine how well DHS implements standards, policies, procedures, and other records management coordination practices to ensure that the Department and its component agencies have effective records management programs and are in compliance with 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B.

SCOPE AND PURPOSE

The purpose of this inspection was to examine how the DHS records management program and component RM programs communicate and cooperate to implement effective records management within the Department as a whole. This inspection focused specifically on RM standards, policies, procedures, and practices at the Department level and their impact on the operational components. It also examined the controls the Department has implemented to mitigate risks associated with non-compliant handling of records and information and to ensure that Department policies and procedures are implemented.

METHODOLOGY

This inspection was conducted using a combination of site visits, teleconferences, and a review of DHS documents. This inspection was limited to Washington, DC, at the Headquarters of DHS.

- The inspection team reviewed records management policies, directives, and other documentation provided by DHS. (See Appendix A)
- The inspection team interviewed appropriate RIM representatives from seven components in person and conducted teleconferences with representatives from four other program offices. (See Appendix D)
- The inspection team used a detailed checklist based on Federal statutes and regulations as well as NARA guidance to guide the course of the inspection. (See Appendix E)
- The inspection team reviewed DHS and component agency responses to the annual Records Management Self-Assessment (RMSA) from 2014 to 2015, and DHS's Senior Agency Official for Records Management (SAORM) reports from 2014 and 2015.

The following DHS Operational and Support Components participated in this inspection:

- **Support Components**
 - Office of the Executive Secretary (ESEC)
 - National Protection and Programs Directorate (NPPD)
 - Domestic Nuclear Detection Office (DNDO)
 - Federal Law Enforcement Training Center (FLETC)

- **Operational Components**

- United States Citizenship and Immigration Service (USCIS)
- United States Customs and Border Protection (CBP)
- United States Coast Guard (USCG)
- Federal Emergency Management Agency (FEMA)
- United States Immigration and Customs Enforcement (ICE)
- Transportation Security Administration (TSA)
- United States Secret Service (USSS)

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.

The Federal Records Act requirements for Federal agencies are found in 44 U.S.C. Chapter 31, Records Management by Federal Agencies. 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))
- 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))

The regulations implementing the Federal Records Act are found in 36 CFR Chapter XII, Subchapter B—Records Management. NARA provides additional guidance to agencies at its records management website - <http://www.archives.gov/records-mgmt/>.

STRUCTURE OF THE REPORT

In accordance with 36 CFR 1239 this report contains:

- (1) An executive summary;
- (2) Background and purpose of inspection;
- (3) Inspection methodology, including offices visited;
- (4) Findings;
- (5) Corrective actions needed and other recommendations; and
- (6) Any necessary appendices, such as summaries of each site visit or the inspection instrument.

DESCRIPTION OF THE DHS RECORDS INFORMATION MANAGEMENT PROGRAM

The complexity of the DHS RIM Program is reflected in the diverse missions of its components. Ranging in scope from civil disaster assistance, to intelligence work, to law enforcement, and military operations, the records and systems created by DHS and its components are among the most complex in the Federal Government. The diversity of missions at DHS means that the components face different challenges to the proper management of records. In addition, the creation of DHS in 2002 brought together many components that had never before collaborated or that had worked under different Departments. This realignment of components presented unique challenges to all DHS RIM programs and the DRO in particular, since it was incumbent on the Department to coordinate the activities of these disparate offices to ensure compliant RIM programs throughout DHS.

Records management for DHS and its operational and support components is guided by DHS Directive 141-01. This directive establishes the DHS records management program and enumerates requirements for records programs throughout the Department. Under the Directive, the DRO operates the RIM program as a federated system and provides guidance and advice to assist all DHS components in managing records effectively and efficiently throughout the records management life cycle. An expanded version of the Directive (Instruction 141-01-001) and its associated appendices implement the requirements established by the Department.

Originally the DRO served in the Office of the Chief Administrator, but in February 2012, the RIM Program Office was transferred to the Office of the Chief Information Officer (OCIO). The CIO also serves as the Senior Agency Official for Records Management (SAORM) for the Department. The OCIO also helps coordinate a larger information governance strategy currently under development at the Department level. This new strategy seeks to closely align offices in the areas of RIM, eDiscovery, Freedom of Information Act (FOIA), and Privacy to better govern access to information across the Department. The RIM program is staffed by the DRO, one Federal employee, and three full time contractors. At the time of the inspection there were two Federal vacancies in the program.

The Departmental RIM Program has been working to establish a Department-wide, coordinated, and cohesive RIM program for several years. There are highlights in the program but also challenges inhibiting the success of these efforts. This inspection report identifies those challenges and makes recommendations to assist the DHS RIM Program in overcoming them.

HIGHLIGHTS OF THE DEPARTMENTAL RIM PROGRAM

The Departmental RIM Program is coordinating some notable projects to improve RIM across the Department. NARA is encouraged by these developments and looks forward to supporting the DHS in these ongoing activities:

Information Governance Transition Plan developed by the Executive Steering Committee and the Information Governance Working Group

Among the numerous RIM initiatives launched by DHS in the past five years, the most significant is the Information Governance (IG) Transition Plan. Work on this plan was initiated in 2012 by the Undersecretary for Management who authorized the study and supported the creation of an Executive Steering Committee (ESC) to investigate a holistic solution to the management of information at DHS. The Transition Plan was drafted by an Information Governance Working Group (IGWG) and a Segment Planning Team comprised of representatives from the RIM, Legal, and FOIA/Privacy lines of business (LOB). These groups produced a report that sought to combine the needs of each LOB to standardize and unify information governance across DHS. Included in the plan are step-by-step guides to improve systems, policies, information management, organizational structures, and training. Developed as a dynamic roadmap to the future of information governance at DHS, the Transition Plan includes strategies to integrate the work of the three LOBs such as information technology (IT) portfolio reviews and the development of an electronic records management system (ERMS) that incorporates the business needs of all three LOBs. The work of this group continues and is integral to the coordinated implementation of a strong information governance structure.

DHS Records Leadership Council

Chartered in 2011, the DHS Records Leadership Council (RLC) is a collaborative body comprising all operational component Agency Records Officers as well as the FLETC Records Officer, and is led by a rotating chair and deputy chair from the membership of the Council. The RLC meets monthly to push forward RIM policies and programs throughout the Department. The Council operates on a 'majority rules' or consensus basis by voting on major issues that affect all components. The DRO works in a strictly advisory capacity with the RLC to establish an agenda and also serves as a liaison to the OCIO. In order to perform its mission, the RLC can establish working groups and committees. The RLC is a high functioning body that is responsible for Department-wide activities including a RIM strategic plan, records schedules, and training.

From the perspective of the DRO, the RLC is a vital organization and works to raise the profile of RIM throughout the DHS. From the perspective of the AROs, the RLC gives them opportunities to exchange ideas and best practices. The functional operation of the RLC is not without its drawbacks, which we note below in the findings and recommendation section of this report.

Records Management Committee

The Records Management Committee (RMC) brings together 21 headquarters (HQ) support components for monthly meetings to discuss current RIM topics and coordinate their work. Some of the topics covered by the group include:

- Records Transfers to NARA
- Review and Implementation of Departmental Records Schedules
- Use and Adoption of the Department-wide File Plan
- Training
- Records Management Maturity Model Preparation and Completion
- Standard Operating Procedures

Significant accomplishments of this group include the establishment of a program-wide SOP library and awards for innovations by members of the committee.

Departmental Records Management Maturity Model Integrated (RM³i)

DHS is among the first Departments to institute a maturity model to evaluate the performance of its components. Maturity models are a type of analytical tool that provide a framework to assess a program or activity based on a set of core principles and standards. An assessment using a maturity model, if done properly and without bias, highlights strengths and weaknesses that support users in making data driven decisions about priorities, improvement projects, and resource allocation.

First instituted in 2011, the Department, using the DHS Records Management Maturity Model (RM³i), annually requires that components provide a self-assessment of their program in four different categories or domains:

- Organizational Infrastructure
- Process Structure
- Tools and Services
- Management Elements

Each domain has assessment areas related to processes such as policy, compliance, leadership, the records life cycle, and security. Performance in each domain is graded on a scale of 0-4. The scale describes organizational maturity as: 1) initial, 2) defined, 3) managed, and 4) optimized. Upon completion, operational components meet with the DHS DRO and staff to review results and discuss strategies for overall programmatic improvement and alignment throughout the Department. As a group, the scores of operational components have steadily improved since 2011, when they averaged a 1.4 out of possible score of 4. As of 2015, they averaged a 1.9 out of a possible 4. The 21 HQ support components have been completing the RM³i since 2012. RIM progress among this group is more uneven with an average a score of 1.1 out of 4, but HQ RIM staff is working to address substantive issues and increase scores among this group.

Mandatory, Tiered, RIM Training Program

36 CFR 1220.34(f) requires agencies to provide guidance and training to all personnel on their records management responsibilities. With the added responsibilities for creating and managing electronic records and email, it is increasingly important for agencies to have RIM training programs.

Since 2011, DHS has worked extensively to bolster its RIM training program for the Department as a whole. Training was developed collaboratively with DHS components to address the needs of employees at various levels within the organization. Activities to support this objective include the assessment of training needs to identify gaps in skill levels, the development of a training curriculum intended to close those gaps, the development of training courses and certification programs, and the delivery of training with diverse offerings (e.g., instructor led courses, virtual classrooms and web-based training). Additionally, the Department provides follow-up support to ensure the transition of skills from the classroom to the office. So far in NARA's series of Departmental inspections, DHS is the first to conduct such training needs assessments and adjust its program accordingly.

Another positive for the DHS RIM program is the continuous nature of the training program. RIM training at DHS is mandatory for all new employees and contractors and offered via an internal learning management system. All employees are taught basic records management concepts such as email management, file plans, and records retentions within 180 days of starting work. Each year afterwards, employees are required to take courses in one of the following areas:

- Basic Records Management
- Electronic Records Management
- File Plans
- Vital Records

Employees can take the courses in any order but must repeat them at the end of the four-year cycle. Staff of the DHS DRO also conduct advanced, face-to-face training for records custodians.

The components ROs interviewed during the course of the inspection expressed general satisfaction with the DHS training program and the level of support they receive from DHS HQ staff. All used the training as the basic platform for their own programs and then supplement the information with operational and support component-specific training and guidance.

In addition to this formal training cycle, the Department developed a tiered training program for employees directly assigned RIM implementation responsibilities. This program has yet to be fully implemented but envisions training for employees at various levels of competency throughout the Department. In this cycle, four levels of training would be developed for as follows:

- Level 1: Basic RIM training for all DHS employees.
- Level 2: Advanced training targeted towards RIM custodians and liaisons.
- Level 3: Programmatic training for records officers.

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- Level 4: At this level the employee would be responsible for not just the operational aspects of RIM, but also the strategic oversight of a RIM program. In addition, an employee would have other programmatic duties such as procurement, project management, and other inter-related disciplines.

The Department continues to pursue this initiative but had not made significant progress past the first two levels at the time of this inspection. NARA is interested in monitoring the implementation of the full program.

Department-wide Records Schedules with Associated File Plans

DHS was one of the first Departments to develop and receive approval from NARA for Department-wide schedules. In 2012, the DHS DRO received approval for a public affairs records schedule that applied to all components within the Department. This was a comprehensive schedule that standardized retention and disposition instructions for like series within public affairs areas across DHS. The development of the schedule was a collaborative project led by the DHS RIM HQ staff and the RLC, which helped to create crosswalks and file plans that superseded dozens of separate operational component schedules and established uniformity for temporary and permanent items. Currently, the Department has five comprehensive schedules at various stages in the NARA schedule approval process. Among these schedules are those that concern important records series such as historical program files, administrative files, and investigative records.

Related to the Departmental records schedule project, the DHS DRO also implemented a new Department-wide filing plan based on the Federal Enterprise Architecture (FEA) Business Reference Model (BRM). The FEA/BRM is an Office of Management and Budget (OMB) business vocabulary that is hierarchical, numeric, and constructed on a functional basis, that can be applied to day-to-day files maintenance within the Federal Government. The FEA system has been implemented for DHS HQ components and, with the exception of Coast Guard, will be implemented by all DHS components to varying degrees. In the case of the Coast Guard, there is the intention to link the FEA file codes with the long established standard subject identification codes (SSIC) used by that service.

The goal of these initiatives is to coordinate as closely as possible the structural aspects of DHS component RIM activities prior to the acquisition and implementation of an ERMS should funding become available to the Department.

FINDINGS AND RECOMMENDATIONS

The DHS Departmental RIM program is generally compliant with records management statutes and regulations under 36 CFR Chapter XII Subchapter B. Overall coordination between the Department and its components works well and provides a foundation for a Department-wide records management program. However, we did note a few areas for improvement or enhancement.

DEPARTMENTAL POLICIES AND STRATEGIC PLANNING

Finding 1: The Departmental Policy and Procedure Instruction 141-01-001 and its appendices are still in draft status.

As part of this inspection NARA reviewed Instruction 141-01-001. DHS relies on this Instruction for day-to-day operations and to implement RIM requirements established throughout the Department by RIM Program Directive 141-01. Instruction 141-01-001 is dated 2012 but is still in draft status. According to the DRO, the scope and purpose of this document need to be revisited because regulations, procedures, and processes have changed since it was drafted.

Recommendation 1: Instruction 141-01-001 and associated appendices must be revised, approved, and issued to DHS components and staff. (36 CFR 1220.34(c))

Finding 2: The DHS Information Technology Strategic Plan does not incorporate records management.

The Office of Management and Budget requires agencies, under 44 U.S.C. 3506(b), to develop and maintain an Information Resources Management (IRM) plan. Agencies are also required by 44 U.S.C. 3506(c)(6) to implement agency information policies, principles, standards, and guidelines with respect to information collection, paperwork reduction, statistical activities, records management activities, privacy and security of records, sharing and dissemination of information, acquisition and use of information technology, and other information resource management functions.

In addition, the recent issuance of new IT guidance in OMB Circular A-130, *Managing Information as a Strategic Resource*,⁴ places much more emphasis on records management. The Circular contains explicit instructions to include records management functionality in system purchases. Therefore, RIM should be incorporated into IRM strategic goals or objectives.

DHS does not have an IRM plan as such, but it does have an approved IT Strategic Plan for FY 2015-2018.⁵ However, this plan does not incorporate records management into IT strategy. In fact, the word “records” does not appear at all in the plan.

⁴ <https://www.whitehouse.gov/sites/default/files/omb/assets/OMB/circulars/a130/a130revised.pdf>

⁵ https://www.dhs.gov/sites/default/files/publications/DHS_ITStratPlan_508.pdf

For new systems that create or maintain records, for enhancements to such systems, or for the retirement of such systems, Departmental IRM plans must include data management strategies, tactics, designs, and proposals. By not recognizing records and records management in the IRM and systems development processes, agency systems may not fully manage records appropriately. DHS is at risk of being non-compliant with 36 CFR 1236.12, which states that:

As part of the capital planning and systems development life cycle processes, agencies must ensure:

- (a) That records management controls (see §1236.10) are planned and implemented in the system.
- (b) That all records in the system will be retrievable and usable for as long as needed to conduct agency business (i.e., for their NARA-approved retention period). (See §1236.14).
- (c) The transfer of permanent records to NARA in accordance with part 1235 of this subchapter.
- (d) Provision of a standard interchange format (e.g., ASCII or XML) when needed to permit the exchange of electronic documents between offices using different software or operating systems.

Including the Departmental RIM program in the IRM Plan and system design strategic planning would also satisfy 36 CFR 1236.20, which states that recordkeeping systems must be able to declare, capture, organize, maintain security, manage access and retrieval, preserve records, and execute disposition. Additionally, by not adequately including RIM in the IT strategy, DHS risks being unable to meet OMB M-12-18, Goal 1.1, which requires the management of permanent electronic records in an accessible electronic format by December 31, 2019.

Recommendation 2.1: The Department must fully incorporate records management and recordkeeping requirements into the goals and objectives of IT strategic planning as per 44 U.S.C. 3506(b) and OMB Circular A-130.

Recommendation 2.2: The Department must involve the Departmental RIM program in information management systems planning to ensure the integration of recordkeeping requirements in information and data management strategies, tactics, designs, and implementations. (36 CFR 1236.6(b)).

Finding 3: DHS does not have an approved contingency plan in the event that it is unable to fund an enterprise-wide ERMS.

In 2011, DHS chartered an Information Governance Executive Steering Committee (IG ESC) to review Departmental needs and requirements in the areas of RIM, Legal, and FOIA/Privacy. The IG ESC was given broad authority to form working and advisory groups and to make acquisition decisions. In the succeeding months, the IG ESC and its Information Governance Working Group (IGWG) developed an ambitious information governance Transition Plan, which included six strategic improvement opportunities (SIOs) and 19 supporting recommendations. Among the key SIOs was a recommendation to acquire an ERMS in order to standardize and unify information governance systems Department-wide.

To focus its efforts and resources on the acquisition of a comprehensive, Department-wide ERMS/eDiscovery/FOIA system, the DHS CIO directed that all Departmental spending on RIM systems be frozen until FY 2017. The acquisition of this system was deemed vital to reduce records and data storage costs, which currently approach \$100 million a year across the Department.

In 2014, the IG ESC appointed an IG Advisory Team to prepare for the acquisition of the new system. In FY 2015, members of the Advisory Team and various DHS LOB stakeholders formed the IG Requirements Working Group. This working group identified functional IT system requirements for an ERMS, gathering and vetting over 180 requirements. ERMS requirements within the system included items such as metadata association, auto-classification, version control, and scheduling functionality, among other attributes. The exact cost of this system is unknown, but DHS estimated it would save over \$40 million with its implementation.

In spite of these intensive preparations, DHS been unable to fund an ERMS. The delay in implementing ERMS has negatively affected the morale of the Departmental RIM program and of all DHS components associated with the IG Transition Plan. In addition, they have had a negative impact on the operations of the RLC. The funding issues have pushed several components to begin pilot projects to investigate the procurement of their own internal ERMS. During the course of the inspection, it became clear that one major component is already moving away from Departmental guidance to pursue its own course of action. As one ARO noted, the freeze on funds for system work at the Department level hindered operations, but did not mean the components could not begin to seek independent solutions if the Department-wide ERMS continues to remain unfunded.

The DRO was aware of some of these projects, and in FY 2015, DHS HQ initiated a pilot project to investigate the records management capabilities of an electronic content management system as a Service. The goal of this project was to explore the utility of such a system as a bridge to a future ERMS or a backup solution if the planned acquisition of a Department-wide ERMS is determined to be not feasible. DHS already utilizes an electronic content management system throughout the Department where it operates on the standard IT infrastructure.

The pilot was tested in an HQ support component with some success, though it was noted that there were risks to operational component adoption as each component would be responsible for securing funding and manually implementing a content management system. It was also noted

that use of a content management system would basically operate as a “day forward” solution and that the licensing and implementation costs to the components were unknown. On the upside, the project lead noted that work with using the existing content management software as a Service would “serve to socialize proper records management and disposition enactment in anticipation of an ERMS rollout.” The results of this work were presented to the operational components in September 2016 for their consideration and comment.

In the end, all components expressed a willingness to continue to support the acquisition of a Department-wide ERMS, but repeated delays threaten to disrupt and even dismantle the significant progress already made by the IG ESC and the RLC.

Recommendation 3: The DHS DRO, with the SAORM, OCIO, RLC, and IG Advisory Team, should adopt a coordinated contingency plan for managing electronic records in the event that the ERMS is not fully funded.

COMMUNICATION AND COORDINATION

Finding 4: Expansion of SAORM support is needed to enhance the DHS Department-wide cooperation and coordination on records management.

Enlisting the support of senior management is essential to enhancing Department-wide cooperation and coordination on records management. One of the key tenets of OMB M-12-18 requires agencies to appoint a Senior Agency Official for Records Management to oversee and review records management programs. The SAORM should work to ensure that:

- all parts of the agency understand the role of effective records and information management in meeting mission needs;
- records management regulations and policies are complied with throughout the organization;
- the Department dedicates the resources necessary to meet OMB M-12-18 goals; and
- the DRO and associated staff members have the support needed to carry out their responsibilities.

Prior to the current organizational alignment, the SAORM was in the Office of the Undersecretary for Management (USM). This allocation worked effectively to advance projects such as the Information Governance Transition Plan. In 2015, the DHS appointed the Departmental Chief Information Officer (CIO), who serves at the Deputy Undersecretary Level, as the SAORM. This appointment provides executive level support to the Departmental RIM program and affords it the opportunity to increase its visibility throughout DHS. However, since some of the DHS RIM programs remain under the control of the Office of the Undersecretary Management, the new SAORM has not been as effective as he might be because of a lack of authority to implement policies for operational components that report to the USM.

Additionally, neither the DRO nor the AROs reported significant interaction with the current SAORM. Several of the AROs reported that the position is not used effectively to promote the Departmental RIM agenda or individual RIM programs. The DRO does have some interaction with the SAORM but not on a regular basis. Enhanced SAORM engagement with all DHS RIM components would help support initiatives such as the proposed Department-wide ERMS and the RM³i evaluation process. Improved coordination with the SAORM, the DRO, and the AROs would help consolidate the excellent work of the RLC and achieve the goal of developing a Department-wide RIM program. Finally, increased SAORM engagement will help to ensure that the DHS remains on track to meet the objectives of OMB M-12-18.

Recommendation 4.1: To increase the effectiveness of the SAORM, the DHS SAORM should establish, through policy or operational procedures, regular meetings between the appropriate executive leadership, the DRO, and component AROs to provide oversight and ensure compliance with records management statutes and regulations.

Recommendation 4.2: The DHS SAORM should establish, through policy or operational procedures, inclusion of the DRO and AROs in the design and implementation of Department-wide information, technology, and records management strategic plans and initiatives.

Finding 5: Department-wide steering committees lack consistent direction, focus, and cohesiveness.

Initially, DHS's creation of two Department-wide steering committees - the RLC for the DHS operational components and the RMC for the support components - was very effective for the Departmental RIM program. However, five years later the orientation and work of both committees needs to be reevaluated and realigned to meet the needs of a maturing organization. Indeed, while the RLC was formulated as a federated "community of practice" for all DHS components, interviews with component members indicated some fracturing over the direction and operations of the Council. Component comments ranged from complete satisfaction with the RLC to the suggestion that the Council lacks significant engagement and is not effective at dealing with problems among the components. This disparity of opinion reveals potential problems with the group's ability to work together as designed. The inspection team also noted that work assignments on the group had fallen to two or three key individuals with limited participation by other members. This also could undermine the effectiveness of the RLC itself and the overall Departmental RIM program.

The DRO recognized this situation in 2014 and issued recommendations to enhance the performance of the RLC. In a memo to members of the RLC, the DRO sought to increase discussion and collaboration among the components through methods such as face-to-face meetings, rotating meeting leads, and increased HQ contact with the components. However, there are continuing issues with the operations of the RLC. As one ARO noted, the RLC was still an effective organization, but needed to be re-energized to engage all components. In addition to this statement, the inspection team found only three of the eight components currently on the RLC were still fully supporting the work of the group.

Operations of the RMC have received less attention over time, but the inspection team noted the parallel importance of this committee to the support components. Inspection interviews with three support components showed mixed interactions with the RMC, with one component having very limited knowledge of the committee. The RMC has also encountered difficulty maintaining momentum over time. Attendance at the RMC meetings has declined steadily as has the number of meetings being held by the group. Organization of the RMC is more vertical in nature, and the group appears to be more of a conduit for the dissemination of information and assignments by HQ RIM staff. Unlike the RLC, there does not appear to be opportunities for the support components to contribute to HQ RIM coordination, planning, or strategy.

Recommendation 5.1: The DHS DRO and the RLC should, through charter or other operating procedures, closely align the activities of the Council to the proposed RIM strategic plan.

Recommendation 5.2: The DHS DRO and associated HQ staff should establish goals for the RMC to firmly establish its purpose among its members.

Finding 6: RM³i data, as a tool for evaluating and improving records management programs, is not being used effectively.

One of the cornerstones of the DHS RIM program is utilization of the RM³i to analyze programmatic progress among components. Five years of data have been collected and show steady program improvement among the DHS operational components. As noted in the highlights section, average scores on the RM³i are now 1.9 out of a possible score of 4 while support components remain at an average of 1.1 out of 4.

Despite the success of the RM³i program as an evaluation tool, neither the DRO nor the AROs have developed a coordinated strategy to help components create program improvement plans or address long-term programmatic problems revealed by the tool. As the ARO for one operational component noted, the RM³i is a good tool to evaluate progress on paper, but more Departmental follow up in problem areas is needed. Other AROs felt that the DRO needed to leverage the success of RM³i to improve component programs.

In March 2016, the DRO proposed to leverage the data from the RM³i to push programs forward by implementing 360 degree communication plans and personalized improvement reports to advance component performance. This initiative was in line with section 2.1 of the proposed RIM strategic plan, which states that the Department will “assess and develop annual maturity plans for the RIM function utilizing the RM³i.”

To be fully compliant with the requirement to formally evaluate records management programs in 36 CFR 1220.34, the DHS and its components should be conducting formal evaluations to validate the RM³i results and to help components identify ways to improve their programs. The DRO has not conducted formal RIM evaluations of DHS components due to staffing and budgetary constraints. To mitigate the lack of resources, AROs should be encouraged to evaluate their own programs and report their findings to the DRO. Of the operational components surveyed, only three reported that they are able to conduct some sort of formal evaluations of their program areas. Several components expressed a desire to establish evaluation or inspection criteria via the RLC, while another component requested that NARA inspect its program. These

lead to the conclusion that the RM³i data is being gathered without onsite evaluations to validate the data.

Recommendation 6: The DRO should develop a method to validate the results of the RM³i that includes records management evaluations and improvement plans.

EMAIL MANAGEMENT AT DHS

Finding 7: Department-wide email policies are out of date or in draft form.

The Department-wide email policy statement, Directive 4500-1, DHS E-mail Usage (March 2003), outlines organizational roles and responsibilities in administering email systems and security. There have been substantial changes to Federal regulations, as well as NARA policy and guidance, regarding email since 2003. This directive, therefore, is currently not in compliance with existing email requirements in 36 CFR 1235.22 (a-f). More current Departmental email policies and procedures are outlined in the draft Instruction 141-01-001, Appendix A, which when finalized would bring DHS into compliance.

Recommendation 7: DHS must implement, and keep current, Department-wide email policies. (36 CFR 1236.22 (a-f))

Finding 8: Current DHS email use and storage strategies do not allow for effective retention and retrieval of email. (36 CFR 1236.10 (a-g))

DHS has been working to improve email management through the acquisition of an ERMS. Part of the Departmental implementation plan for an ERMS includes plans for a robust email solution, though the exact configuration of this system has yet to be determined. Component agencies have been restricted from acquiring their own ERMS for email while the Department seeks funding for an enterprise-wide solution.

Currently, DHS utilizes Email as a Service (EaaS) across the Department. EaaS allows DHS and the components to capture and journal or archive emails; however, several components reported that this part of the service was insufficient from a records management standpoint since no approved retention periods and disposition instructions are associated with the system. This dovetailed with concerns about journaling from a records accessibility and retrieval standpoint for FOIA and security purposes, since the process preserves a copy of an email in a separate system that might not be dispositioned in accordance with the retention period assigned to the user's email.

All components reported that EaaS enables them to meet, but only at a minimal level, the requirements of 36 CFR 1236.22 (a-f) and Goal 1.2 of OMB M-12-18 to manage all email in electronic format. DHS instructions, guidance, and training continue to indicate that emails with a retention exceeding 180 days should be printed and filed. HQ and component staff may also use Enterprise Vault (or E-vault) to retain emails, though this approach has limited records management functionality.

Some DHS components use E-vault, but as Appendix A of Instruction 141-01-001 notes, it is not a records management system. It is used to capture and hold all emails, but components report that searching and retrieving records within the tool is difficult. In addition, emails can still be deleted by the user even after storage in the E-vault. With some configuration instructions, E-Vault can segregate and store email messages that are responsive to FOIA requests, litigation holds, and other queries, but most components use the system as a simple tool to maintain all emails and their attachments without assigning them to dispositions or schedules. This adds to the growing volume of emails maintained by the Department and exacerbates search issues.

The RLC recently reviewed these storage alternatives and suggested that components provide users with filing and retention instructions for emails. However, the Council did not provide system level recommendations or alternatives.

36 CFR 1236.10 (a-g) requires that system solutions provide adequate and proper documentation of agency business for as long as the information is needed. The Department's current method for handling email does not facilitate access and retention by disposition authority. This also affects DHS's ability to meet the requirements of Goal 1.2 of OMB M-12-18, requiring that email be managed electronically in an accessible format.

Recommendation 8.1: DHS current email storage systems must meet retention and retrieval requirements under 36 CFR 1236.10 (a-g) as well as OMB M-12-18, Goal 1.2.

Recommendation 8.2: DHS should establish the records management controls needed for email storage and disposition in specifications for the acquisition of a new ERMS. (36 CFR 1236.10 (a-g), 1236.12 (a-d), and 1236.22 (a-f))

Finding 9: DHS has not established a strategy for scheduling email records.

DHS allows each operational component to develop its own policy for the scheduling and capture of emails. However, the components are not moving forward with the scheduling of email pending the approval of funding for a Department-wide ERMS.

It is important for DHS to have email schedules in place that enable staff to properly handle email. This is an area where the SAORM and the OCIO, in cooperation with the DRO and RIM staff throughout the agency, must be more assertive and proactive in ensuring effective email policies and procedures are implemented Department-wide.

Recommendation 9: DHS must decide on its approach to email management and submit for the Department, or by individual operational components, the GRS 6.1 form NA-1005 or a retention schedule to NARA for approval.

CONCLUSION

In conclusion, the DHS Departmental RIM program is substantially compliant with records management statutes and regulations under 36 CFR Chapter XII Subchapter B. Overall, coordination between the Department and its components is adequate. DHS has instituted innovative practices such as the RLC, the RMC, and the RM³i, that could be of interest to other Federal agencies. The Department has also developed a far-reaching information governance plan that, if implemented, could serve as a model for other Departments or agencies. All of these initiatives help foster good relations between the DRO and the components, but there is room for improvement. This is a fact that the DRO and bodies such as the RLC already recognize.

In general, there are issues with the finalization of plans, policies, and procedures at the Department level that should be addressed by the SAORM and other senior managers, in coordination with the DRO and the AROs. Work on directives and strategic plans cannot be allowed to lapse as that would cause the Departmental RIM program to be out of compliance with 36 CFR Chapter XII Subchapter B. In addition, failure to complete these initiatives poses a risk to meaningful coordination among the components. The continued cooperation of these components is essential to the continued success of the Departmental RIM program. By making the improvements recommended in this report, the DHS Departmental RIM program would further strengthen its program and help the Department achieve its mission.

APPENDIX A
RELEVANT PRE-INSPECTION DOCUMENTS

Department of Homeland Security Information Technology Strategic Plan, 2015 – 2018

Department of Homeland Security Records and Information Management Program Office Strategic Plan, 2013-2017

Department of Homeland Security Information Governance Transition Plan

Department of Homeland Security Records Leadership Council Charter

Department of Homeland Security Records and Information Management Directive (141-01), 2014

Records Leadership Council Action Plan for Strategic Goals, 2013

Records Procedural Instruction Condensed (141-01-001), 2010

Office of the Chief Information Officer, Program Decision Option, Information Governance, 2018-2022

Department of Homeland Security, Investment Proposal, Information Management Domain ESC, 2018-2022

Department of Homeland Security, RM3i Metrics, 2011 - 2014

Department of Homeland Security, Operational and Support Component RM3i Metrics, 2015

Department of Homeland Security, Mandatory Records Management Training Memorandum, 2012

Department of Homeland Security Records Management Qualification Training and Certificate Development Plan, 2011

Department of Homeland Security Records Leadership Council Charter

Departmental Records Schedules

Department of Homeland Security Records Management Self-Assessments 2012 - 2015

Department of Homeland Security Senior Agency Official for Records Management Annual Reports 2013 – 2015

APPENDIX B

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 Managing Government Records Directive, M-12-18
- OMB/NARA Guidance on Managing Email, M-14-16
- Other NARA Bulletins currently in effect

FOLLOW-UP ACTIONS

- ACTION PLAN

The Department of the Homeland Security will submit to NARA a Plan of Corrective Action (PoCA) 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.

- PROGRESS REPORTS

The Department of the Homeland Security will submit to NARA progress reports on the implementation of the action plan until all actions are completed.

- NARA REVIEW

NARA will analyze the adequacy of the DHS action plan, provide comments to the DHS on the plan within 60 calendar days of receipt, assist the DHS in implementing recommendations, and inform the DHS when progress reports are no longer needed.

APPENDIX C

COMPLETE LIST OF FINDINGS AND RECOMMENDATIONS

Finding 1: The Departmental Policy and Procedure Instruction 141-01-001 and its appendices are still in draft status.

Recommendation 1: Instruction 141-01-001 and associated appendices must be revised, approved, and issued to DHS components and staff. (36 CFR 1220.34(c))

Finding 2: The DHS Information Technology Strategic Plan does not incorporate records management.

Recommendation 2.1: The Department must fully incorporate records management and recordkeeping requirements into the goals and objectives of IT strategic planning as per 44 U.S.C. 3506(b) and OMB Circular A-130.

Recommendation 2.2: The Department must involve the Departmental RIM program in information management systems planning to ensure the integration of recordkeeping requirements in information and data management strategies, tactics, designs, and implementations. (36 CFR 1236.6(b)).

Finding 3: DHS does not have a contingency plan in the event that it is unable to fund an enterprise-wide ERMS.

Recommendation 3: The DHS DRO, with the SAORM, OCIO, RLC, and IG Advisory Team, should adopt a coordinated contingency plan for managing electronic records in the event that the ERMS is not fully funded.

Finding 4: Expansion of SAORM support is needed to enhance the DHS Department-wide cooperation and coordination on records management.

Recommendation 4.1: To increase the effectiveness of the SAORM, the DHS SAORM should establish, through policy or operational procedures, regular meetings between the appropriate executive leadership, the DRO, and component AROs to provide oversight and ensure compliance with records management statutes and regulations.

Recommendation 4.2: The DHS SAORM should establish, through policy or operational procedures, inclusion of the DRO and AROs in the design and implementation of Department-wide information, technology, and records management strategic plans and initiatives.

Finding 5: Department-wide steering committees lack consistent direction, focus, and cohesiveness.

Recommendation 5.1: The DHS DRO and the RLC should, through charter or other operating procedures, closely align the activities of the Council to the proposed RIM strategic plan.

Recommendation 5.2: The DHS DRO and associated HQ staff should establish goals for the RMC to firmly establish its purpose among its members.

Finding 6: RM3i data, as tool for evaluating and improving records management programs, is not being used effectively.

Recommendation 6: The DRO should develop a method to validate the results of the RM3i that includes records management evaluations and improvement plans.

Finding 7: Department-wide email policies are out of date or in draft form.

Recommendation 7: DHS must implement, and keep current, Department-wide email policies. (36 CFR 1236.22 (a-f))

Finding 8: Current DHS email use and storage strategies do not allow for effective retention and retrieval of email. (36 CFR 1236.10 (a-g))

Recommendation 8.1: DHS current email storage systems must meet retention and retrieval requirements under 36 CFR 1236.10 (a-g) as well as OMB M-12-18, Goal 1.2.

Recommendation 8.2: DHS should establish the records management controls needed for email storage and disposition in specifications for the acquisition of a new ERMS. (36 CFR 1236.10 (a-g), 1236.12 (a-d), and 1236.22 (a-f))

Finding 9: DHS has not established a strategy for scheduling email records.

Recommendation 9: DHS must decide on its approach to email management and submit for the Department, or by individual operational components, the GRS 6.1 form NA-1005 or a retention schedule to NARA for approval.

APPENDIX D
OFFICES INTERVIEWED DURING INSPECTION

Office of the Executive Secretary (ESEC)

National Protection and Programs Directorate (NPPD)

Domestic Nuclear Detection Office (DNDO)

United States Citizenship and Immigration Service (USCIS)

United States Customs and Border Protection (CBP)

United States Coast Guard (USCG)

Federal Emergency Management Agency (FEMA)

Federal Law Enforcement Training Center (FLETC)

United States Immigration and Customs Enforcement (ICE)

Transportation Security Administration (TSA)

United States Secret Service (USSS)

APPENDIX E SELECTED COMPLIANCE QUESTIONS

Specific Questions/Areas Addressed:

- Responsibility and governance as they relate to the implementation and oversight of the Department's RIM Program
- Dissemination of records management directives and other issuances
- Knowledge and experience of RIM staff and training provided to RIM staff, agency employees, and contractors
- Assignment of records management responsibilities to program and administrative units
- Coordination of RIM program activities among the departmental components and communication of RIM requirements to and within departmental components
- Senior management support ensuring adequate resources (time, budget) for their RIM staff and other business line staff to administer the program and to pursue training, professional development, and continuing education opportunities
- The RIM program ensures that recordkeeping requirements are embedded into business functions providing adequate documentation of the agency's activities
- The RIM program has oversight ensuring that the agency has effective controls in place to manage records created by staff and contractors and to manage records created and shared in multi-agency environments
- Records scheduling is coordinated among the agency components including developing and monitoring the implementation of records schedules and the dissemination of records schedules changes
- Records disposition is coordinated among the agency components including the transfer of inactive records to storage, the transfer of eligible permanent records to NARA, and the tracking of all records dispositions
- Electronic records management objectives, responsibilities, authorities and guidance are incorporated in pertinent agency directives, disseminated to agency components, and monitored for compliance
- Electronic records migration strategies are designed and implemented by the agency and components to ensure electronic records are maintained to meet business purposes and to comply with NARA-approved retention schedules
- Risk management including identifying, analyzing, and assessing risks to the integrity,

authenticity, reliability, usability, and preservation of its records and information

- The RIM program has a coordinated program of evaluations/inspections/audits, conducted on an annual cycle or similar, to ensure the records management program is efficient, effective, and compliant
- The RIM program conducts and coordinates RIM training to ensure that those individuals with responsibility for records management have adequate training and professional development consistent with their responsibilities

APPENDIX F

ACRONYMS AND ABBREVIATIONS

ARO	Agency Records Officer
BRM	Business Reference Model
CIO	Chief Information Officer
CFR	Code of Federal Regulations
DHS	Department of Homeland Security
DRO	Departmental Records Officer
EaaS	Email as a Service
ERMS	Electronic Records Management System
ESC	Executive Steering Committee
FEA	Federal Enterprise Architecture
FOIA	Freedom of Information Act
IG	Information Governance
IG ESC	Information Governance Executive Steering Committee
IGWG	Information Governance Working Group
IRM	Information Resources Management
IT	Information Technology
LOB	Line of Business
NARA	National Archives and Records Administration
OCIO	Office of the Chief Information Officer
OMB	Office of Management and Budget
PoCA	Plan of Corrective Action
RAP	Requirements Analysis Package
RLC	Records Leadership Council
RLO	Records Liaison Officer
RIM	Records and Information Management
RM3i	Records Management Maturity Model
RMC	Records Management Committee
RMSA	Records Management Self-Assessment
SAORM	Senior Agency Official for Records Management

SIO	Strategic Improvement Opportunity
SSIC	Standard Subject Identification Codes
U.S.C.	United States Code



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