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## Management of Permanent Records at the Department of Energy

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*Multi-Agency Records Management Inspection Report*

National Archives and Records Administration  
April 2021

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# MANAGEMENT OF PERMANENT RECORDS AT THE DEPARTMENT OF ENERGY MULTI-AGENCY RECORDS MANAGEMENT INSPECTION

## 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 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 management of permanent records by six component agencies of the Department of Energy (DOE) as well as selected representatives from DOE headquarters offices and laboratories. DOE refers to component agencies, laboratories and offices as “elements.”

Component agencies included in the inspection were: Bonneville Power Administration (BPA), Energy Information Agency (EIA), National Nuclear Security Agency (NNSA), Southeastern Power Administration (SEPA), Southwestern Power Administration (SWPA), and Western Area Power Administration (WAPA).

Other entities included were: DOE Headquarters (HQ) Records Management (RM) Program, Office of Management (MA) within the Office of the Executive Secretariat, Office of Intelligence and Counterintelligence (IN), Office of Environmental Management at the Hanford Site and the Office of Science at Pacific Northwest National Laboratory (PNNL), and Office of Environmental Management at Savannah River Site (SRS).

The purpose of this inspection was to examine compliance among DOE elements with federal records management statutes and regulations relating to permanent records and to assess the effectiveness of their records management policies and procedures concerning permanent records. In particular, the inspection focused on the creation, management, and transfer of permanent records with an emphasis on electronic records, including email. It further assessed the ability of these elements to manage permanent electronic records in an electronic format, plans to digitize or convert analog records, transferring permanent records to the National Archives, and training.

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<sup>1</sup> 44 U.S.C. Chapter 29, [NARA Basic Laws and Authorities](#).

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There are fundamentals of records management that, regardless of records retention and disposition, must be in place and properly implemented so that records are accessible to decision-makers and others when needed for business. These fundamentals include the knowledge of what types of records are being created and maintained, where they are located when needed for decision-making and government accountability, and ensuring their access and availability throughout their lifecycle. If these fundamentals are not in place or are not properly implemented, records may be at risk of being lost and/or mishandled, making them inaccessible to those who need them. The safeguarding of records is even more important for permanent records. Records scheduled as permanent have been determined to have significant value to the Nation beyond that of their original business needs. While in agency custody, permanent records must be identified, scheduled, preserved, and protected until they are eligible for transfer to the National Archives in accordance with NARA-approved retention schedules. Putting records management into practice involves intellectual control (i.e., knowing the content of the records, how and why they are created, and ownership) as well as physical control (i.e., safeguarding access and preservation). Achieving both intellectual and physical control requires governance in the form of policies, procedures, inventories, retention schedules, and internal controls. Due to COVID-19 this inspection was conducted virtually through video conferences and supporting documentation. In conducting an inspection of component agencies and offices within DOE, the inspection sought to identify practices regarding permanent records that may also be of value to other departments as well as other federal agencies. Specific analysis, feedback and applicable recommendations for each agency are included in Appendix A.

## **OVERVIEW OF KEY ASPECTS OF THE RECORDS MANAGEMENT PROGRAMS**

DOE has three major divisions (Offices) headed by Under Secretaries who are primarily responsible for policy formulation and overall management of the Department. DOE is composed of 10 program offices, 15 staff offices, 4 power marketing administrations, and 2 other administrations: the Energy Information Administration and the National Nuclear Security Administration. Under the offices and administrations, there are 21 laboratories and technology centers and 9 field offices.

The DOE records management program is a complex, decentralized federation of autonomous programs with oversight, coordination, and facilitation by the Department Records Officer (DRO), under the direction of the Department Office of the Chief Information Officer (OCIO). There are formally designated Agency Records Officers (ARO), Program Records Officials (PRO), Records Management Field Officials (RMFO), and Records Liaison Officials (RLO), and Contractor Records Coordinators (CRCs), known as Records Managers.

NARA conducted a previous inspection of the DOE Records Management Program in 2015. The program has made considerable progress over the past five years, and there is momentum for continued improvement. However, over the course of this inspection, it was found that several elements, and in some cases all of those interviewed:

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- Have outdated records management policies, procedures and retention schedules;
  - Are having challenges with electronic records management and the transition from paper records;
  - Lack detailed inventories of permanent (and temporary) records and other governance mechanisms necessary for intellectual control;
  - Have history programs that are maintaining overdue permanent records and lack controls in compliance with DOE Orders; and
  - Are not routinely transferring permanent records to the National Archives.

### **TRANSITION TO ELECTRONIC RECORDS (OMB/NARA M-19-21)**

Since 2012, NARA and the Office of Management and Budget (OMB) have provided goals for federal agencies to modernize recordkeeping practices and transition to a digital government. OMB/NARA *Managing Government Records Directive* (M-12-18) provided initial guidance to federal agencies to move towards electronic recordkeeping to the fullest extent possible. This directive was superseded on June 28, 2019, by OMB/NARA *Transition to Electronic Records* (M-19-21),<sup>2</sup> which provides deadlines for federal agencies to ensure that all federal records are created, retained, and managed in electronic formats, with appropriate metadata.

NARA has been monitoring the plans and capabilities of agencies to make this transition and included discussions specifically related to this topic with DOE elements. DOE and its elements indicated that the OMB/NARA directives have prompted the Department to provide them with the necessary support to move towards fully electronic recordkeeping (for both permanent and temporary records). Working towards this goal, DOE and its elements are at various stages of testing and implementing Microsoft Office 365 applications for email and/or for managing records as well as for collaboration. Some components are also utilizing Electronic Document Management Systems (EDMS)/Electronic Records Management Systems (ERMS).

Even with the current momentum to improve the RM program within DOE and its elements, more progress needs to be made. This report makes 8 findings and 15 recommendations that will assist the DOE and its elements in mitigating the risk to records, bringing their RM programs into compliance as they relate to permanent records. We found that all the findings and recommendations applied to the entities inspected. See Appendix A for an overview and more specific information about each element.

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<sup>2</sup> OMB/NARA *Transition to Electronic Records* (M-19-21), <https://www.whitehouse.gov/wp-content/uploads/2019/06/M-19-21.pdf>.

REQUIREMENTS	DOE HQ RM	DOE HQ Offices	BPA	SEPA	SWPA	WAPA	EIA	NNSA	Hanford	PNNL	SRS
Program Coordination	◐	◐	◐	○	○	◐	◐	○	◐	◐	◐
Disposition Requirements	○	○	○	○	○	○	○	○	○	○	○
Program Management Requirements	◐	◐	◐	○	○	◐	◐	◐	◐	◐	◐
Program Management Oversight	◐	○	●	○	○	◐	◐	◐	●	●	●
Managing Electronic Records	◐	◐	●	○	◐	◐	○	○	●	●	●
<b>KEY</b>											
RM Fully compliant or integrated	●										
RM Mostly compliant or integrated	◐										
Needs Improvement for RM to be fully compliant and integrated with statutes and regulations	○										

## FINDINGS AND RECOMMENDATIONS\*

\*The findings and recommendations apply to all participating agencies and offices of DOE.

### PROGRAM COORDINATION

#### **Finding 1: The Department and its elements lack an implementation plan or methodology to meet the goals and targets of the DOE RM Strategic plan and OMB/NARA M-19-21.**

Most, but not all, DOE elements interviewed are planning or are already undertaking projects to identify and transfer legacy permanent records series to the National Archives. The completion of these projects prior to the December 31, 2022 deadline in OMB/NARA M-19-21 is a primary objective of the DOE RM Program and will help it achieve Objective 1.1 and Goal 3 of DOE's recently issued 2019-2022 RM Strategic Plan<sup>3</sup>. However, due to the decentralized nature of the DOE RM program, no coordinated plan has been developed to ensure success in meeting the targets of OMB/NARA M-19-21 or the objectives of the DOE RM Strategic Plan by 2022.

During NARA inspection interviews, it was apparent that many of the DOE elements have not conducted an analysis of how they will align their respective RM programs with OMB/NARA M-19-21 and the DOE RM Strategic Plan. Without such an analysis by each RM program, determining how each element will incorporate the goals and targets of both directives into their program plans will be difficult. It was not clear how DOE HQ planned to coordinate the activities of the elements to meet the requirements of the DOE RM Strategic Plan and OMB/NARA M-19-21.

<sup>3</sup> United States Department of Energy 2019–2022 Records Management Strategic Plan, [https://www.energy.gov/sites/prod/files/2020/02/f71/DOE%20Records%20Management%20Strategic%20Plan-2019-2022\\_0.pdf](https://www.energy.gov/sites/prod/files/2020/02/f71/DOE%20Records%20Management%20Strategic%20Plan-2019-2022_0.pdf).

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*Recommendation 1.1: DOE and its elements must coordinate and incorporate the targets of OMB/NARA M-19-21 with the goals of the 2019-2022 DOE RM Strategic Plan.*

*Recommendation 1.2: DOE and its elements must coordinate and create project plans and metrics through the DRO that align with the DOE RM Strategic Plan and OMB/NARA M-19-21.*

## **DISPOSITION REQUIREMENTS**

### **Finding 2: Permanent records are overdue for transfer and are being retained without notification to NARA as required by 36 CFR 1235.12 and 36 CFR 1235.14.**

36 CFR 1235.12 and 36 CFR 1235.14 require permanent records to be transferred to the National Archives in accordance with retention schedules. All agencies must seek approval from NARA to retain records in agency custody longer than specified on a records disposition schedule.

The NARA inspection team found overdue permanent records at nearly every DOE element interviewed. In some instances, elements were maintaining voluminous historical collections with records going back to the very foundation of the office or program they documented. Inventories and finding aids for the collections were reported to be inadequate in some cases, while access to the collections by the public was of a limited nature.

Since 2018, the DOE records officer has been engaged in a project to transfer overdue permanent records to the National Archives. This project has met with some success, but is focused primarily on textual records stored by the DOE at Federal Records Centers instead of all formats. Some elements also are actively working to transfer records to the National Archives, such as WAPA's legacy records inventory, boxing, and transfer project, and DOE HQ's Historian Vault Records Transfer Project. NARA acknowledges both that there are a number of legal holds in place at DOE that may delay the transfer of permanent records to the National Archives and the recent closures at DOE and NARA due to the pandemic have delayed these efforts, particularly in support of the transfer the Historian's collection to NARA.

Analog records in element space, commercial storage, archives, libraries, and historical collections need to be addressed in a coordinated manner to meet Target 1.2 of OMB/NARA M-19-21 by December 31, 2022. After that date, all permanent records in federal agencies will have to be managed electronically to the fullest extent possible for eventual transfer and accessioning by the National Archives in an electronic format.

The following are examples of overdue records reported to the inspection team. See Appendix A for more details.

- The DOE History Office collection in Germantown, Maryland, maintains over 2500 boxes of records of historical value designated as permanent under DOE schedule N1-434-92-001. As noted above, DOE is actively engaged in processing these records for transfer to NARA.
- NNSA Laboratories have established historical collections and libraries containing permanent records that are overdue for transfer, for example Los Alamos National Laboratory is retaining records of the Manhattan Engineering District.

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- NNSA HQ's permanent records are currently stored in the NNSA Electronic Documents Online Correspondence and Concurrence System (eDOCS) system managed by the Executive Secretariat's Office. The NNSA eDOCS system mimics the system currently used by DOE HQ, and the two elements will be developing a plan/strategy for testing and transfer of those permanent records to the National Archives.
  - The SRS permanent records collection includes the following records that are overdue for transfer: SRS site construction records (including design and other engineering documentation), operating history records, unique one of a kind research and development activity records, site policies, and waste characterization/disposal records that require declassification.
  - The Hanford Site has many historical collections, with records dating to the establishment of the site in 1942. Many have been digitized, but not all the overdue paper nor digital records have been transferred to the National Archives. Hanford has transferred several photograph collections (Settlers, DuPont, GE) including original negatives, digital images, and associated electronic metadata. Other transfers include: 2018 (direct offer) 85 boxes, 2020 (Annual Move) 219 boxes and 2021 (Annual Move) 169 boxes.
  - PNNL currently has approximately 2900 Laboratory Records Books (LRBs) that may include ones that are 30 years old or older.
  - WAPA has potential legacy permanent paper records from the Bureau of Reclamation (BOR) that were transferred to WAPA custody when they separated from BOR.
  - SEPA has a historical paper collection that includes Department of Interior records (from when SEPA was first established under that Department), and previous Administrator's correspondence and directives.
  - BPA Library has an archive of historical photographs, documents, and digital content that are overdue for transfer to the National Archives.
  - Records of the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling in the Office of Fossil Energy.
  - IN has 117 boxes of classified permanent records that will be quality reviewed and transferred to the National Archives.

*Recommendation 2.1: DOE RM and its elements must identify and transfer eligible permanent records overdue for transfer to the National Archives. (36 CFR 1226.22 and 36 CFR 1235.12)*

*Recommendation 2.2: DOE RM and its elements must establish internal controls to ensure all permanent records are routinely identified and transferred when eligible in accordance with NARA-approved records schedules. (36 CFR 1220.30(c)(1))*

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**Finding 3: Repositories of historic records are being maintained without the required written approval of NARA.**

36 CFR 1235.14 directs that agencies may only maintain records longer than specified in a disposition schedule with written approval from NARA. 36 CFR 1235.16 specifically states that agency requests will be denied if the agency is retaining records to:

- (1) Provide access services to persons outside the agency that can be provided by NARA, or
- (2) Function as an agency archives, unless specifically authorized by statute or by NARA.

In association with overdue records, like those listed in Finding 2 above, over the course of many decades, DOE elements have established archives and libraries that maintain custody of original permanent records past their approved retention period and have failed to transfer custody of historical records to the National Archives according to NARA-approved records schedules.

DOE HQ and elements maintain archives and libraries that house original records and provide research services to the public. The Office of History and Heritage Resources maintains an archive that comprises more than 6,000 cubic feet of classified and unclassified textual records. Most of these records were acquired by the former DOE History Division following the dissolution of various programs and offices. These records were scheduled as permanent by the National Archives in 1992 with a bulk transfer date of 2007, but few series have been transferred to the custody of the National Archives. The Office of Legacy Management maintains over 70,000 cubic feet of textual records, along with large holdings of electronic records associated with formerly utilized nuclear sites. Other DOE elements have archives and library collections as well, such as the Bonneville Power Administration and the Hanford Site. Within NNSA, the Los Alamos National Laboratory maintains an archive of over 12,000 cubic feet of historical records going back to its founding.

While NARA does not have specific policies or guidance concerning the establishment of agency archives, libraries, and historical collections, these institutions should not be used to negate the regulatory authority given to the Archivist of the United States in 44 U.S.C. 2107 to direct and effect the transfer of records to the custody of the National Archives, nor should they disrupt the regulatory responsibilities for records management assigned to federal agency heads by 36 CFR 1220.32(a-e).

*Recommendation 3: DOE must submit to NARA a comprehensive list of agency archives, libraries, and historical records collections holding original permanent records that are overdue for transfer to the National Archives. (36 CFR 1226.22 and 36 CFR 1235.12)*



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**Finding 4: Records management program policies, procedures and guidance lack clear requirements covering the records collection activities of the Office of the Chief Historian, Archivists, and Librarians.**

DOE has limited internal guidance covering the records collection activities of historians, and the subsequent creation of archives and libraries at DOE. There is also a lack of clear guidance describing the relationship of DOE historians and librarians to the RM program. According to DOE Order 243.1b, the Chief Historian is to assist in the identification, organization, and preservation of records, and to provide access to them, but it is not clear if historians are directed to collect original records to create history collections, libraries, and archives. Order 243.1b also directs the Chief Historian to provide the DRO with an annual inventory of records, but this is not consistently done. Additionally, DOE Order 243.1b does not address the relationship of the Chief Historian and the RM program to historians, librarians, archivists at DOE elements which have established and maintain their own repositories of historic records.

The responsibilities of the current DOE historian were recently transferred from the Office of History and Heritage Resources in the Office of the Executive Secretariat Management to the Office of Legacy Management. In an interview with the team leader for Archives and Information Management of the Office of Legacy Management, it was noted that the duties and responsibilities of the current historian were based primarily on position description references and not on established departmental policies and procedures regarding records collection activities, the application of records schedules, and interactions with the RM program. It was stated that a meeting is planned with all DOE historians and archivists to gain an understanding of their duties and responsibilities across DOE and to develop a strategy to address legacy historical records in the Department.

The relationship of DOE historians, archivists, and librarians with the DOE RM program is of crucial importance to the proper handling, maintenance and disposition of permanent records according to departmental and element policies and federal records requirements. Failure to define this relationship at the Department and element level can lead to delays in the transfers of permanent records to the custody of the National Archives according to scheduled dispositions, the disruption of series-level provenance, the creation of artificial series of records, the alienation of records, and even the loss or destruction of records.

*Recommendation 4.1: The DOE program and elements should develop policies, procedures and guidance providing for departmental oversight of historians, as well as archivists and librarians.*

*Recommendation 4.2: DOE should develop policies and guidelines for records collection activities by historians, as well as archivists, and librarians, in all DOE elements in accordance with approved departmental RM policies. Included in these guidelines should be departmental standards regarding records maintenance and public access to DOE records repositories.*

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## **PROGRAM MANAGEMENT REQUIREMENTS**

### **Finding 5: Records schedules are out of date or in draft form.**

36 CFR 1224.10 requires federal agencies to schedule records and to regularly review and update those schedules. In addition, agencies are required to promptly apply additions and changes to the General Records Schedules (GRS) to their records. These reviews and updates are required to ensure that records schedules accurately and adequately reflect the work of the offices throughout the Department. Retentions can change, and new series of permanent records can be created due to the changes in element organizations, missions, and operations.

DOE schedules are out of date and in need of review. A crosswalk, provided by the DOE RM program, shows that the vast majority of departmental level schedules are 20 years old or older, with some dating back to 1976. Records of the Power Marketing Administrations are scheduled independently of those of the Department. Before 2020, the most recent schedule among the Power Marketing Administrations was over 10 years old, with the oldest dating back to 1988. In 2020, WAPA received legal approval from NARA to implement eight new media neutral schedules. Many other DOE and Power Marketing Administration schedules are not media neutral, which hinders the ability of records custodians to transfer permanent electronic records to the National Archives.

Currently, the DOE RM program is engaged in a comprehensive schedule review, including the review of new NARA-approved GRS items. As of May 2020, 206 schedule items had been reviewed, with reductions and rescissions recommended for over 70 percent of the items. DOE Power Administrations are also cognizant of the need for new schedules or schedule updates. Of these elements, however, only WAPA has submitted schedules to NARA for review.

To be in compliance with federal RM regulations and to meet Target 1.4 of OMB/NARA M-19-21, DOE elements must regularly review their records schedules and should provide the DOE RM program with any changes or updates. In turn, the DOE RM program should continue to lead its coordinated effort to ensure that all departmental schedules are created and updated in a timely manner according to DOE Records Management Strategic Plan Goal 1, Objective 1.2.

*Recommendation 5.1: DOE elements and Administrations must develop plans to review and update their respective records schedules in coordination with the DRO to ensure schedules accurately reflect agency mission and procedures. (36 CFR 1220.34(g) and 36 CFR 1225.22)*

*Recommendation 5.2: DOE elements and Administrations in coordination with the DRO must establish a routine process by policy or procedure to review schedules for obsolete information and identify new or unscheduled records that need to be added. This policy or procedure must inform the Records Management Program office of the status of these schedule updates and these schedules should be published. (36 CFR 1220.34(g) and 36 CFR 1225.22)*

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## **Finding 6: Policies and procedures are out of date or in draft form.**

A successful records management program has an established governance framework and communicated policies in place. Department-wide directives and policies must inform all personnel who create, receive, and use federal records of their records management responsibilities (36 CFR 1220.34(c)). Policies should be developed with all relevant stakeholders and must address the requirements of the Federal Records Act<sup>4</sup>, 36 CFR Chapter XII Subchapter B<sup>5</sup>, and other relevant guidance issued by NARA and OMB, such as OMB Circular A-130 and OMB/NARA M-19-21.

Having current approved RM directives, policies, procedures and guidance on the management of permanent records is essential to the success of any RM program. The inspection team notes several initiatives to update the governance framework that need to be continued and finalized:

- The DOE RM program is in the process of updating its foundational documents and has issued an RM handbook that provides guidance on permanent records for the use of DOE elements.
- An update of the departmental records management directive, DOE O 243.1b, which was approved in 2013, is in draft status and should be reviewed to place more emphasis on RM program management oversight of permanent records in all DOE elements.
- To assist with the identification and disposition of legacy permanent records, the RM program developed a procedure to assist the Office of History and Heritage Resources with the transfer of records to the legal and physical custody of the National Archives. This procedure is still in draft status and should be reviewed for application to other elements within DOE to help the Department meet Target 1.2 of OMB/NARA M-19-21.

The Power Marketing Administrations typically follow the broad outlines of DOE Order 243.1b, but develop policies and procedures based on their unique needs and missions. Among the Administrations, policies and procedures were generally being reviewed and updated. Two Administrations were actively rebuilding their RM programs with directives regarding general RM procedures in draft form. All the Administrations should review their policies and procedures concerning the ongoing management of permanent records in accordance with Targets 1.1 and 1.2 of OMB/NARA M-19-21.

*Recommendation 6: DOE elements, working in collaboration with the DOE Department Records Officer, must create and/or update comprehensive RM policies and procedures covering the management of all records, including permanent records. (36 CFR 1220.34(c))*

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<sup>4</sup> 44 U.S.C. Chapter 31, Federal Records Act, [Records Management by Federal Agencies \(44 U.S.C. Chapter 31\)](#).

<sup>5</sup> 36 CFR Chapter XII, Subchapter B, Records Management.

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**Finding 7: Intellectual control of agency permanent records is insufficient.**

DOE and the element RM programs are not fully aware of the types of permanent records that are being created and whether they are scheduled. It was noted that potentially permanent records are being stored in multiple locations including shared network drives, Microsoft SharePoint sites, agency recordkeeping systems, on networks, and paper. Records management controls such as records inventories and file plans, if in place, are often inadequate or not being actively implemented.

DOE and its elements often indicated that there were analog and electronic records that have not been inventoried, and are possibly unscheduled. As previously mentioned, the DOE Chief Historian has numerous legacy historical records in paper and possibly other analog formats that have not been inventoried and are overdue for transfer. BPA has potentially permanent photos, drawings, reel-to-reel tapes, and other records stored in their basement that do not have adequate inventories to determine whether they are scheduled, and that were thought to be 30 years old or older. Shared network drives were especially an issue, with many not having been cleaned up since their creation, and that also lack governance and the use of consistent naming conventions. DOE and several elements noted that they are aware of the issue and are in the process of cleaning up records, including those on shared drives.

Additionally, while most elements indicated that they have electronic information systems (EIS) inventories, not all EIS inventories submitted to NARA as background information included whether the systems were scheduled. PNNL, for example, submitted an EIS inventory for systems containing records that did not include the disposition instructions necessary to determine whether they were scheduled and when they would be eligible for transfer to the National Archives. 36 CFR 1236.26, OMB Circular A-130<sup>6</sup>, and NARA Bulletin 2010-02<sup>7</sup> require agencies to maintain inventories of electronic information systems and to use them in the identification and scheduling of those systems.

Complete and up-to-date records inventories and file plans are essential tools for maintaining agency records in all formats, and are especially important as agencies transition to fully electronic recordkeeping. Creating and/or updating these tools is also critical for gaining intellectual and physical control of agency permanent records, enabling staff to readily find records when needed for business, as well as developing and implementing records schedules.

*Recommendation 7.1: DOE HQ and its elements must complete and/or update records inventories and file plans for all records, especially permanent records, in all formats in agency offices and business units. (36 CFR 1220.34(i) and 36 CFR 1225.12(b))*

*Recommendation 7.2: DOE elements must create and/or update an inventory of all agency electronic information systems, especially those containing permanent records, to include NARA-approved disposition information. (36 CFR 1236.26, OMB Circular A-130, and NARA Bulletin 2010-02)*

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<sup>6</sup> OMB Circular A-130, *Managing Information as a Strategic Resource*, <https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/OMB/circulars/a130/a130revised.pdf>.

<sup>7</sup> NARA Bulletin 2010-02: *Continuing Agency Responsibilities for Scheduling Electronic Records*, [Federal Records Management, NARA Bulletins](#)

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**Finding 8: Records lifecycle operations and the management of RM functions within Microsoft Office 365 does not include the necessary management and oversight by RM staff.**

The planning, development, and implementation of RM functions within Microsoft Office 365 are being jointly managed by and conducted within the DOE-HQ RM and the DOE-IT. While it is good that RM is being included in DOE's Microsoft Office 365 project, IT operational management of all Microsoft Office 365 RM lifecycle functions are being conducted solely within the IT governance framework. Routine RM lifecycle operations do not fit well with IT configuration management/control governance processes and may impose insufficient service levels to end users. NARA provides specific regulations, policy, guidance and other instructions for agencies to follow in order to manage records regardless of format or the system they reside in. There is also the risk of deletion or loss of records contrary to NARA-approved retention schedules resulting in the need to report unauthorized dispositions to NARA. DOE has policy and procedures that articulate compliance with NARA requirements. It is important that the DOE RM program have formal responsibility for overseeing the RM functions and related services in Microsoft Office 365. This will support accountability and ensure consistency in the implementation of processes similar to those accomplished in legacy or paper processes, align with DOE policy and procedures, and is in compliance with RM regulations, NARA policy, guidance and instructions.

*Recommendation 8: DOE must affirm through policy, directive or procedure that the management and oversight of the records management lifecycle within Microsoft Office 365 is the responsibility of the DOE Department Records Officer and will be carried out with appropriate attention to records management statutes and regulations prescribed by 36 CFR Chapter XII Subchapter B and DOE Order 243.1b.*

## **NOTEWORTHY PRACTICES**

### **RECORDS MANAGEMENT PROGRAM OVERSIGHT**

The DOE Headquarters RM Program initiated an evaluation program called the Records Assistance Visits, Evaluations, and Networking program (RAVEN). While this important oversight function is in the early stages of implementation, RAVEN should provide support to DOE elements and offices by assisting them with RM compliance issues, such as the management and transfer of permanent records to the National Archives. The RAVEN program should also help with RM process improvements and possibly with future resource allocations for RM activities. Additionally, some elements conduct assessments, inspections, audits and quality control processes of their respective programs.

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## **EDMS/RMA IMPLEMENTATION**

Many of the DOE elements are actively implementing an Electronic Document Management System (EDMS)/Records Management Application (RMA). It was found that the Electronic Document Workflow System (EDWS) at the SRS was particularly effective for the storage, retrieval, and eventual transfer to the National Archives of permanent electronic records in a variety of formats. EDWS can apply schedule and metadata information to records input into it from individual users and systems. Of particular note was the ability of the system to ingest records directly from over twenty EIS in use at SRS. As configured, EDWS can expand to accept records from other systems, and positions SRS to meet the requirements of OMB/NARA M-19-21. The inspection team also made note of the Integrated Document Management System (IDMS) at the Hanford Site, which was established in 2002 and now maintains over 53 million objects. IDMS can be used to transfer permanent records to the National Archives via the Electronic Records Archives (ERA). BPA has implemented the records management application Content Manager, and an indexing tool called Control Point. Using these applications, BPA has indexed 90 percent of the agency's unstructured data across SharePoint and network drives. Finally, PNNL has been managing electronic records for over twenty years on site through a Department of Defense (DOD) Standard 5015.2 certified repository. In general, it was found that DOE contractors were making significant strides in the implementation of EDMS/RMAs at some of their sites.

## **CONCLUSION**

NARA urges the DOE RM program to review the disparate permanent records projects taking place across the Department to identify standards or best practices among the various elements that can be adopted as enterprise-wide strategies to meet the OMB/NARA M-19-21 targets and the DOE RM Strategic Plan.

The management of permanent records is most effective when conducted as part of a comprehensive records management program. While the focus of this inspection was on permanent records, how these records are being managed is representative of how all records are most likely being managed. The management of permanent records is one of the biggest challenges agencies are facing, along with establishing and maintaining effective RM programs with limited staff and resources.

The recommendations in this report are intended to facilitate improvements that should minimize the risks to federal permanent records to ensure they are readily accessible to support mission essential functions until their eventual transfer to the National Archives.

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## APPENDIX A

### OVERVIEW AND RESULTS FOR EACH INSPECTED DOE ELEMENT

NARA is providing the following feedback as a tool for DOE to focus on how the consolidated findings and recommendations documented in the report relate to each respective organization. Please note: This feedback is limited by the lack of on-site inspection processes due to COVID-19 travel restrictions.

#### **HEADQUARTERS ELEMENTS**

##### **DOE HQ RM Program**

**Program Summary:** The DOE HQ Records Management Program is embedded in the Office of the Chief Information Officer (OCIO). The program, which is supported by the DOE SAORM, comprises the Departmental Records Officer as well as records support staff and contractors. The program was inspected in 2015 as part of NARA’s Departmental Coordination Series, and recently closed all inspection items in their plan of corrective action.

The DOE RM program is continuing to modernize through a wide variety of initiatives and plans. These initiatives include participation in the planning, development and testing of the records management capabilities of Microsoft Office 365. The HQ RM program is creating a playbook and technical guidance that can be leveraged within the DOE business lines where Electronic Records Management (ERM) capabilities need to be implemented. The DOE RM program has also published a 2019-2022 DOE Records Management Strategic Plan that is designed to be forward-looking and challenging. Through its stated vision, goals and objectives, the plan emphasizes the importance of protecting and securing the Department’s records and information resources which supports goal 4.5 of the DOE 2018-2022 Information Resources Management (IRM) Strategy.<sup>8</sup> This goal charges the DOE to “Modernize the Department’s Federal Records and Information Management Approach to Achieve Electronic Records Management to the Fullest Extent Possible,” which is also the main goal of OMB/NARA M-19-21.

The Department seeks to transition its federal recordkeeping to a fully-electronic environment to reduce costs and create efficiencies, while increasing appropriate and timely access to records and information. Included in this effort is an enterprise digital signature strategy and an enterprise-level business process redesign, to ensure all federal records and information processes are born digital and remain digital throughout the records lifecycle.

**Specific Challenges/Barriers for Permanent Records:** DOE operates a decentralized IT environment across the Department which significantly reduces its ability to centralize an electronic records management approach to the identification and eventual transfer of permanent records to the National Archives. Many elements are working to clean up shared drives that have not been managed since their creation. DOE is creating a file share cleanup Standard Operation Procedure (SOP) to aid in the governance of these records. The RM program office is working with DOE elements to provide direction and assistance, but this remains a significant risk. DOE

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<sup>8</sup> United States Department of Energy 2018–2022 Information Resources Management Strategy, [energy.gov/sites/prod/files/2019/09/f66/FY%202019-2022%20DOE%20IRM%20Strategy.pdf](https://energy.gov/sites/prod/files/2019/09/f66/FY%202019-2022%20DOE%20IRM%20Strategy.pdf).

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is also managing a significant collection of legacy permanent (and temporary) paper records across all of its elements. Additional risks are reduced budgets, a lack of technology to provide standardization and automation, and insufficient staffing and resources to support the entire Department's needs in managing the transition to electronic records management.

Based upon discussions with DOE, the records lifecycle operations and management of those RM services within Microsoft Office 365 are being siloed within the DOE-IT governance processes. The planning, development and implementation of the RM services functionality in Microsoft Office 365 is being jointly conducted within the DOE-HQ RM and the DOE-IT programs. This approach could create undue records lifecycle management latency and conflict between the HQ RM and IT organizations. Regular RM lifecycle operations are outside the scope of IT configuration management/control governance processes. The DOE RM program should operate and manage the RM functionality within Microsoft Office 365.

### **DOE HQ Office of Intelligence and Counterintelligence (IN)**

**Program Summary:** The IN RM program has one Records Officer and one Records Liaison. Records Management is not the only responsibility of these staff members. Both RM roles have been providing records guidance to staff, meeting with divisions to review documents for updating records schedules and processing records for permanent storage at the National Archives.

**Specific Challenges/Barriers for Permanent Records:** IN has 117 boxes of permanent materials that are being prepared for transfer to the FRC. They were conducting the second review and quality check prior to the COVID-19 pandemic and restrictions. This effort is on hold pending lifting of COVID-19 restrictions. IN does not have any electronic systems to manage its permanent electronic records but is coordinating internally with the DOE IN IT Technology Team to discuss the implementation of an IN permanent records management system through the DOE HQ RM pilot of Microsoft Office 365. The IN Technology Team is coordinating with the DOE HQ RM program on the transition to Microsoft Office 365.

### **DOE HQ Office of Management (MA)**

**Program Summary:** The Office of Management (MA) handles high level administrative services for the DOE from logistics, to travel, to human resources, as well as the activities of the Executive Secretariat which includes correspondence of the Office of the Secretary and the Under Secretaries. MA has five staff members assigned to records management duties. All of these individuals have other duties in addition to records management.

MA maintains the correspondence of the Secretary and Under Secretaries in eDOCS, which contains metadata dating back to 1981 and correspondence dating back to 1997. Currently, there are almost 700,000 documents in the system. The system meets NARA requirements for digitization standards and is capable of making electronic transfers to ERA as documents begin to meet their dispositions in 2022.



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**Specific Challenges/Barriers for Permanent Records:** Records inventories provided by MA show the need for a general review of assigned schedule items with particular attention to GRS series. MA continues to maintain custody of a large volume of permanent textual records that should be reviewed for transfer to the National Archives to meet the targets of OMB/NARA M-19-21.

**OFFICE OF ENVIRONMENTAL MANAGEMENT**  
**Hanford Site**

**Program Summary:** The DOE Hanford Site consists of the Richland Operations Office and the Office of River Protection, which share a joint RM program that consists of one full-time federal RMFO and two dedicated RM subcontractors. There are two other RM-related positions overseeing scanning operations that consist of one contractor and one part-time federal employee. The DOE Hanford site also has extensive full or part-time contractor staff supporting RM scope of work.

All five main Hanford mission contractors each have RM programs. The site support contractor is responsible for providing RM services and systems to DOE and the other contractors. Each contractor maintains RM procedures written to align with the site support contractor RM procedures but detailing their responsibilities within the program.

Hanford has a large, mature electronic records repository, good collaboration among site contractors on RM activities, and has implemented Capstone for email retention. Electronic records are stored in their Integrated Document Management System (IDMS) which, as noted above, is a DOD 5015.2 certified system. Physical records are stored either on site at the NQA-1 qualified Records Holding Area or at the Federal Records Centers (FRC).

**Specific Challenges/Barriers for Permanent Records:** Challenges include reinstating disposition after decades of a full-site moratorium due to litigation holds and freezes and a lack of directed funding. In addition, The Hanford Site also has many historical collections with records dating to the establishment of the site in 1942. Many of the records have been digitized, and some but not all of the records (paper or electronic) have been transferred to the National Archives. The current site priorities are the identification of records that have exceeded their retention due to litigation holds, and digitizing the remaining collections to ensure integrity, confidentiality, and accessibility. Hanford also maintains classified permanent and temporary records. A project is underway to sort, reclassify, and/or reschedule these records. This activity will reduce the collection volume. Once the project is complete, eligible permanent records will be offered to the National Archives.

Although out of scope for this inspection, Hanford has a large collection of overdue temporary records. They have approximately 49,000 cubic feet at the FRC and 20,000 cubic feet onsite. It was apparent that there could be issues with dispositioning temporary records.

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## Pacific Northwest National Laboratory (PNNL)

**Program Summary:** PNNL Records Management has eight Records Management Professionals who support the RM program full-time. PNNL has been managing electronic records through a DOD Standard 5015.2 certified repository for over twenty years. PNNL has comprehensive records management training, procedures, policy and processes. The PNNL RM fiscal year (FY) focus has been on the following:

- Records disposition and permanent transfer to the National Archives
- File plan realignment for business records
- Electronic records management strategy

PNNL permanent records are being managed and stored electronically in an electronic records management system (Micro Focus Content Manager) and as scheduled physical records at NARA's FRC.

**Specific Challenges/Barriers for Permanent Records:** PNNL currently maintains four ongoing research and development projects that have permanent records that likely have not met disposition requirements. There is a disposition backlog due to the "Downwinder" moratorium on the destruction of records and a lack of staffing resources. In addition, PNNL currently has approximately 2900 Laboratory Records Books (LRBs), some of which may be 30 years old or older and overdue for transfer to the National Archives.

## Savannah River Site (SRS)

**Program Summary:** The RM program at SRS comprises 26 full-time employees and an RM contractor. SRS also has over 120 Department Records Contacts (DRC) who serve as records points of contact in their respective organizations across SRS.

The SRS RM program, through Savannah River Nuclear Solutions (SRNS), provides records services for Savannah River Nuclear Solutions Environmental Management, Savannah River Remediation (SRR) Liquid Waste, and Savannah River National Laboratory (SRNL) to include receipt, review, and archival storage of hardcopy and electronic records. Additional services provided include, but are not limited to, records disposition, records storage assessments, and assistance in creating records inventories. SRS has also published an RM strategy and roadmap for 2020-2022 that aligns with the DOE RM Strategic Plan.

SRS permanent electronic records are archived in the EDWS database, which provides for the efficient management and eventual transfer of these records to the National Archives. The EDWS allows for archived records to be identified using numerous metadata fields. SRS also maintains a vault for permanent non-electronic records that conforms to Nuclear Quality Assurance-1 (NQA-1) standards for storage of nuclear quality assurance records.

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SRS has extensive evaluation and oversight controls for RM processes. SRS conducted or received routine audits by DOE, DOE-HQ, and internal quality assurance programs at SRS. RM program activities that have been audited in the past include, for example:

- Destruction of temporary records with expired retentions;
- SRNL laboratory notebooks processing; and
- Storage and digitization procedures.

The SRS RM contractor participates in the IT Governance Program to provide comments on new systems proposals that may generate and store federal records. SRS also conducts System-specific Records Inventory & Management Plan (SRIMP) reviews to document if an EIS contains federal records, and assigns approved retention periods as well as the transfer method to be used to send to archival storage.

**Specific Challenges/Barriers for Permanent Records:** SRS has been challenged by limited resources and the lack of priority for RM within select work business offices groups at SRS. While SRS maintains classified permanent records, there is no large-scale declassification review of these records currently underway due to resources. Records are reviewed for declassification upon request. Finally, previous transfers of permanent records to the National Archives were rejected by NARA based on the availability of archival space at that time and immediate public value of the records. However, since OMB/NARA M-19-21 was issued, the SRS RM program has again begun working with NARA to ship permanent hardcopy records.

## **DOE COMPONENT AGENCIES (ELEMENTS)**

### **Energy Information Administration (EIA)**

**Program Summary:** EIA has one part-time interim Records Management Officer/Liaison and one back-up, who assists on a less than part-time basis. The EIA RM program was previously maintained by an Agency Records Officer (ARO) who had many years of experience and expertise before leaving the agency. EIA is currently in the process of hiring a new Records Officer.

EIA has been electronically transferring permanent records to the National Archives in the Electronic Records Archives (ERA), with assistance from their NARA-assigned appraisal archivist. EIA has worked with the appraisal archivist and DOE HQ to successfully ensure permanent record submissions, tracking, and any necessary follow-up actions.

**Specific Challenges/Barriers for Permanent Records:** EIA does not currently have a designated ARO. EIA lacks a records policy or procedure in support of identifying and transferring EIA's permanent electronic records overdue for transfer to the National Archives.

There are gaps with past integration of RM into IT processes that facilitate integrating RM into the design and development of information systems including ensuring applicable metadata capture for permanent records. Involving the ARO in IT investment processes and reviews is critical for ensuring RM controls are established to ensure the reliability, integrity, usability, content, context, and structure of records and information in electronic systems. There has been

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some improved collaboration with EIA IT, including coordinating with EIAs Information Technology Team to collect information about the systems/records, cloud storage, retention, and transferring permanent records to the National Archives.

### **National Nuclear Security Administration (NNSA)**

**Program Summary:** NNSA-HQ Records Program Office (RPO) has one federal employee and two support service contractor employees. The RPO is responsible for development, coordination, training and oversight of the NNSA Records Management Program across eleven HQ elements and eight field offices/Maintenance and Operation (M&O) locations. The RPO also ensures that oversight is conducted for the M&O locations. The RPO has the responsibility to coordinate with DOE HQ Records Management and NARA on all activities, initiatives, and assessments applicable to NNSA. The RPO is also responsible for the evaluation, selection, acquisition coordination, establishment and implementation of the NNSA Electronic Records Management System (ERMS). Each HQ element has an RLO, and each field office has a Records Management Field Officer (RMFO). The RLOs and RMFOs have the responsibility for implementing the NNSA Records Management Program within their respective organizations. HQs and field offices also appoint organization-specific Records Management Coordinators to coordinate with the RLOs and RMFOs. Almost all RLOs and RMFOs have other roles and responsibilities in addition to their records management responsibilities.

**Specific Challenges/Barriers for Permanent Records:** The majority of personnel assigned to NNSA HQ records management roles view it as “other duties as assigned.” Except for the records officer, most have little to no RM knowledge or experience. Implementation of a full lifecycle RM program has never been established and maintained at NNSA HQ due in part to the lack of personnel resources. NNSA is supposedly updating their records schedules but it wasn’t apparent that this effort is being coordinated with the DOE DRO.

NNSA HQ permanent records are currently stored in the NNSA eDOCS system managed by the NNSA Executive Secretariat’s Office. The NNSA eDOCS system mimics the system used by DOE MA, and the two elements will be developing a plan or strategy for testing and transfer of those permanent records to the National Archives.

NNSA also wants to procure an ERMS to capture and preserve permanent records, but rollout is tied to the NNSA IT Modernization Project, which will establish a separate NNSA IT platform that is managed and operated independently of DOE. This includes all IT resources and applications, as well as the NNSA ERMS. Another significant issue is the lack of front end collaboration between IT and the RM Program; the RM Program is usually only included on the back end.

NNSA-HQ has not conducted any assessments, reviews or inspections, but some NNSA elements do conduct these as part of site-specific policies and procedures. NNSA was not aware of DOE-HQ’s RAVEN program, but expressed interest in building similar capability if resources became available.

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NNSA laboratories have established historical collections and libraries containing permanent records that are overdue for transfer. In July 2019, Los Alamos National Laboratory detailed a new archive containing a collection of weapons research records. Most of these records include official documents, drawings, and films produced by the Laboratory and other organizations in DOE and DOD. Some records are from scientists and engineers who have retired, including Robert Oppenheimer. The challenge will be for NNSA and Los Alamos National Laboratory (and all NNSA laboratories that have historical collections) to work with NARA on preservation, retention, and transfer requirements.

**POWER MARKETING ADMINISTRATIONS (ELEMENTS)**  
**Bonneville Power Administration (BPA)**

**Program Summary:** The BPA Records Management Program is called the “Information Governance and Lifecycle Management Program” (IGLM) and resides organizationally within the Information Governance organization. The IGLM team is composed of three full-time federal employees and two contractors. The ARO (who is also the Freedom of Information Act Officer and Privacy Officer) oversees the program.

Information governance and lifecycle management is the framework that BPA uses to describe the policies, strategies, processes, practices, services and tools used by the organization to manage its information assets through every phase of their existence, from creation or receipt, through their useful life to final destruction or transfer into the holdings of the National Archives.

BPA’s IGLM program is well-established. It was one of the first agencies to implement an aggregate flexible schedule or big bucket schedule. BPA transfers permanent records to the National Archives annually. The strengths of the BPA IGLM program are compliance with federal records management requirements and the use of innovative approaches to managing new records management challenges, including the current challenges with electronic records.

**Specific Challenges/Barriers for Permanent Records:** In 2017, the IGLM program reviewed the BPA file plan and made significant reductions in the number of redundant, unused, or obsolete file codes in use by BPA offices. There is a need for a comprehensive review of the current BPA big bucket schedule, since it is now over ten years old.

The IGLM program has indexed shared drives and SharePoint sites throughout BPA for inclusion in an electronic recordkeeping system (ERKS), Discovery Core, and is working to update Information Asset Plans (IAP) to gain better control over records in all BPA organizations. BPA Policy requires tri-annual reviews of component asset plans, but it has not been well-enforced. IGLM is working to better enforce this requirement and considering an annual review requirement.

While the BPA IGLM program has implemented an ERKS, there was a recognized need to inventory and schedule EIS that cannot be incorporated into the system in accordance with BPA policy 236-16, Overview of Electronic Systems. IGLM program staff also recognized the need to develop transfer mechanisms for permanent records maintained in these systems.

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Finally, as noted in finding 2, the BPA library maintains an archive of photographs, documents, and born-digital content. The library uses a digital asset management system to maintain digitized copies of the photographs and records, as well as the born-digital records. The BPA library maintains an inventory of its holdings. The IGLM program, in coordination with the library, will be reassessing the records in the archive to determine which records should be transferred to the National Archives.

### **Southeastern Power Administration (SEPA)**

**Program Summary:** The Southeastern Power Administration is a small agency with less than 50 full-time equivalents (FTE). The PRO at SEPA is a management analyst who also handles a wide variety of administrative assignments. The PRO is assisted on a part-time basis by the IT manager for SEPA.

SEPA an assigned Agency Records Officer (ARO). Additionally, the SEPA General Counsel is the Senior Agency Official for Records Management (SAORM), designated by SEPA Order on October 8, 2020. SEPA will designate a PRO once the position is filled.

Due to the small size of SEPA limited personnel and monetary resources are available to the RM program. SEPA senior management recently approved the purchase and installation of Microsoft Office 365 to assist with better management of emails and electronic records.

In addition to the above statement, senior management has approved (Jan 2021) the upgrade purchase to G5 in Microsoft 365 (M365) to assist with better management of emails and electronic records and to aid the agency with compliance. Microsoft training will be forthcoming to agency personnel (IT/ARO/SAORM) to implement the additional records management features offered under the G5 license. In addition, SEPA will utilize DOE's Playbook for Microsoft 365 to implement various IT configurations to manage electronic records.

Currently, SEPA has a mix of textual and electronic records and still maintains a central files area and designated file rooms in its divisions. A review of the file plan is taking place and personnel are working to inventory all records, textual and electronic, within the organization.

This effort is ongoing but progress has been limited due to the pandemic. Southeastern currently restricts entry to the facility to involve only essential functions.

**Specific Challenges/Barriers for Permanent Records:** SEPA has legacy textual records that are over 30 years old but would like to scan those records prior to their transfer to the National Archives. Resource limitations have hampered work in this area. These limitations have also impacted the identification and transfer of permanent records in all formats to the National Archives.

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In addition to the barriers identified above, progress has been limited due to the ongoing pandemic. Southeastern currently restricts entry to the facility to essential functions.

The SEPA records schedule is now almost twenty years old and is not media neutral. The current version is hand marked with changes and updates that need to be made to the schedule.

Southeastern's site-specific records schedule (N1-388-00-1) was approved by the U.S. Archivist on June 25, 2002. The DOE HQ's Records Management Scheduling Team is currently revising all DOE Records Schedules across the DOE enterprise to leverage resources, knowledge, and manpower and to promote uniformity across the DOE Enterprise. Southeastern is waiting for those revisions.

SEPA records management policies have not been updated since 2009 and are in need of a comprehensive review to meet the current needs of the organization.

DOE is currently revising DOE Order 243.1B – Records Management (2013). The revised policy, DOE Order 243.1C is in the final stages of revision and Southeastern is waiting publication of this DOE Order as a guideline, as well as the testing and implementation at our local agency level of G5 features in Microsoft M365 to begin the work on revising our local records management policies.

### **Southwestern Power Administration (SWPA)**

**Program Summary:** The SWPA RM Program consists of a part-time ARO who has collateral duties within the IT organization, a part-time records clerk lead, and two full-time records clerks.

Through the interviews and documentation provided by SWPA, the RM program is in the beginning stages of obtaining sponsorship, priority and resources. SWPA has been focused on updating their records policies and procedures, and educating divisions on the records lifecycle and the importance of centralizing records in an electronic format. Additionally, SWPA is digitizing all paper records and migrating records into SharePoint in preparation for moving to a new location in Tulsa, Oklahoma. The RM program is also working to clean up records at all SWPA locations. A legacy Documentum recordkeeping system was recently migrated to SharePoint and will be the primary repository for all business line records at SWPA except for unique applications such as AutoCAD. RM staff have been focused on adding metadata within SharePoint.

**Specific Challenges/Barriers for Permanent Records:** SWPA has not routinely transferred permanent records to the National Archives. There are two challenges for SWPA to transfer permanent records to the National Archives; getting the internal divisions to understand the importance of records dispositions and having a centralized location for records. The RM program is struggling to locate permanent records and then having divisions part with those records. SWPA potentially has records that are thirty years old or older. SWPA likely has obsolete formats of permanent mixed media including cassette tapes, microfiche, reel-to-reel, VHS, and floppy disks. SWPA lacks migration plans and readers to view or convert obsolete formats.

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NARA has not been notified of 30 year old or older permanent records, because SWPA has not had the RM staff to locate, get approval, and transfer records up to this point. They are now in the planning stage for the transfer of past due permanent records to the National Archives and the development of policies to prevent the delay in transfers from happening again in the future.

### **Western Area Power Administration (WAPA)**

**Program Summary:** WAPA has one ARO, one Records and Information Management (RIM) Specialist and a contract records technician. The ARO and RIM Specialist both spend 70-75% of their time on RM responsibilities, while the contract records technician is dedicated to RM on a full time basis. Additionally, they have three contract regional records technicians and RM Points of Contact (POC) with part-time RM duties.

WAPA has established a standalone RIM Program with the WAPA Chief Executive Officer/Administrator serving as the SAORM, leadership from the Chief Administrative Officer (CAO), and monthly briefings with the CAO and Chief Information Officer (CIO). They have established a RIM Program Steering Council and WAPA Information and Records Enterprise System cross-organizational working group. This collaborative working group also works to strengthen important partnerships between the CAO/RIM Program, CIO/Information Technology staff, regional Administrative Officers, and General Counsel.

WAPA has been committed to the following RM focus areas:

- Implementing an electronic records management system to support full electronic records management.
- Obtaining NARA approval for draft functional records schedules (submitted in December 2019).
- Working across business units to identify implementable electronic records identification processes and management strategies.
- Maturing the overall WAPA RIM Program.

**Specific Challenges/Barriers for Permanent Records:** WAPA is historically very regionalized and, while similar work functions are beginning to move to enterprise approaches, it has been a slow process. Staff understand the need to keep information to be responsive to audits; however, many staff members hold onto records past their NARA-approved dispositions. Based upon this culture, obtaining business organization agreement to the transfer of permanent records to the National Archives has been a challenge. WAPA was originally part of the Bureau of Reclamation (BOR) and took custody of legacy records when they separated. Some, but not all, of the BOR permanent records were transferred to the National Archives. The time to process and prepare transfers to ensure they are not duplicating legacy BOR records already at the National Archives has also been a challenge.



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## **APPENDIX B INSPECTION PROCESS**

### **OBJECTIVE AND SCOPE**

The objective of this inspection was to determine how well DOE and its elements comply with federal records management statutes and regulations relating to permanent records and to assess the effectiveness of their records management policies and procedures.

### **METHODOLOGY**

This inspection was restricted by the COVID-19 pandemic, which prevented on-site inspections of records management practices. However, with the cooperation of the DOE participants, NARA carried out this inspection by conducting teleconferences with select headquarters and field locations. Interviews included both RM staff and program staff, and focused specifically on the management of permanent records only. In addition, the inspection team:

- Reviewed records management policies, directives, and other documentation provided by the elements
- Used a detailed checklist of questions based on federal statutes and regulations, and NARA guidance
- Reviewed responses to current and past annual Records Management Self-Assessments (RMSA), Senior Agency Official for Records Management (SAORM) annual reports, and Federal Electronic Records and Email Management reports.

### **ELEMENTS INTERVIEWED**

- DOE Headquarters (DOE HQ)
- Bonneville Power Administration (BPA)
- Energy Information Agency (EIA)
- National Nuclear Security Agency (NNSA)
- Southeastern Power Administration (SEPA)
- Southwestern Power Administration (SWPA)
- Western Area Power Administration (WAPA)

Other entities included were: DOE Office of Management (MA) within the Office of the Executive Secretariat, Office of Intelligence and Counterintelligence (IN), Office of Environmental Management at the Hanford Site, Office of Science at Pacific Northwest National Laboratory (PNNL), and Office of Environmental Management at Savannah River Site (SRS).

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## **APPENDIX C**

### **RELEVANT INSPECTION DOCUMENTATION**

The inspection team received and reviewed copies of the following documentation provided by each of the elements, if applicable:

- Organizational charts
- RM program strategic plans, goals and objectives
- RM policies, directives, manuals, standards and other RM-related issuances relating to the management of permanent records
- Internal controls or guidance used to manage permanent records
- Data/records management templates or other instruments used for managing the data/records lifecycle
- Agency permanent records schedules
- Documentation of RM training related to permanent records
- Inventory of scheduled and unscheduled electronic systems that contain permanent records
- Migration and metadata standards and practices in use for permanent records
- Inspection, audit, or evaluation reports of RM permanent records practices and any follow-up actions
- Notices of permanent records freezes or holds
- Departing staff exit clearance procedures and/or checklist, particularly around safeguarding against unauthorized removal of records, the identification of permanent records eligible for transfer to the National Archives, including senior executive staff, political appointees, and other senior agency officials.
- Records management language in contractual agreements

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## APPENDIX D 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 - [Federal Records Management, NARA 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 - [Office of the Chief Records Officer for the U.S. Government](#).

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

DOE will be required to submit to NARA a Plan of Corrective Action (PoCA), for the findings and recommendations listed above, that specifies how the Department 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 Department.

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

The DRO will be required to submit to NARA progress reports on the implementation of the action plan until all actions are completed. NARA will inform DOE when progress reports are no longer needed.

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**APPENDIX E**  
**ACRONYMS AND ABBREVIATIONS**

ARO	Agency Records Officer
BOR	Bureau of Reclamation
BPA	Bonneville Power Administration
CAO	Chief Administrative Officer
CFR	Code of Federal Regulations
CIO	Chief Information Officer
DOD	Department of Defense
DOE	Department of Energy
DRC	Department Records Contact
DRO	Department Records Officer
EDMS	Electronic Document Management System
eDOCS	Electronic Documents Online Correspondence and Concurrence System
EDWS	Electronic Document Workflow System
EIA	Energy Information Administration
EIS	Electronic Information System
EM	Environmental Management
ERA	Electronic Records Archives
ERKS	Electronic Recordkeeping System
ERM	Electronic Records Management
ERMS	Electronic Records Management System
FRC	Federal Records Center
FTE	Full-Time Equivalent
FY	Fiscal Year
GRS	General Records Schedules
HQ	Headquarters
IAP	Information Asset Plan
IDMS	Integrated Document Management System
IGLM	Information Governance and Lifecycle Management Program
IN	Office of Intelligence and Counterintelligence
IRM	Information Resources Management
IT	Information Technology
LRB	Laboratory Records Books
MA	Office of Management
M&O	Maintenance and Operation
NARA	National Archives and Records Administration
NNSA	National Nuclear Security Administration
NQA	Nuclear Quality Assurance
OCIO	Office of the Chief Information Officer
OMB	Office of Management and Budget
PNNL	Pacific Northwest National Laboratory
POC	Point of Contact
PoCA	Plan of Corrective Action
PRO	Program Records Official

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RAVEN	Records Assistance Visits, Evaluations, and Networking Program
RIM	Records and Information Management
RLO	Records Liaison Official
RM	Records Management
RMA	Records Management Application
RMFO	Records Management Field Official
RMSA	Records Management Self-Assessment
RPO	Records Program Office
SAORM	Senior Agency Official for Records Management
SEPA	Southeastern Power Administration
SOP	Standard Operating Procedures
SRIMP	System-specific Records Inventory & Management Plan
SRNL	Savannah River National Laboratory
SRNS	Savannah River Nuclear Solutions
SRR	Savannah River Remediation
SRS	Savannah River Site
SWPA	Southwestern Power Administration
U.S.C.	United States Code
WAPA	Western Area Power Administration



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