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U.S. Environmental Protection Agency

Records Management Inspection Report

National Archives and Records Administration
September 4, 2025

U.S. ENVIRONMENTAL PROTECTION 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.[1] In this capacity, and based on authority granted by 44 United States Code (U.S.C.) 2904(c)(7) and 2906, we assess records management (RM) programs of federal agencies to determine compliance with federal statutes and regulations. We then work with the federal agencies to improve their records management programs based on our inspection findings and recommendations.

This report documents NARA's 2024 inspection of the RM Program at the U.S. Environmental Protection Agency (EPA). We analyzed the EPA's compliance with federal RM statutes and regulations and adherence to and effectiveness of agency RM policies, procedures, and guidelines, particularly concerning permanent records.

We focused on the coordination of RM program implementation across the EPA, specifically between the EPA Headquarters Offices and its Regional Offices, with emphasis on:

- RM policies and procedures
- implementation of electronic recordkeeping systems
- strategic planning
- digitization
- records schedule implementation
- oversight

Additionally, we identified practices of interest to the broader federal RM community.

This report explains areas of non-compliance and areas for improvement. It covers

- the EPA RM Program overview
- findings and recommendations
- noteworthy practices

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

RECORDS MANAGEMENT PROGRAM OVERVIEW

The EPA National Records Management Program (NRMP) is organized in the Enterprise Records Management & Controlled Unclassified Information (CUI) Division aligned under the Office of Records, Administrative Systems, and eDiscovery (ORASE) within the Office of Mission Support (OMS). The EPA RM Program is led by a full-time Agency Records Officer (ARO) and a Deputy ARO who was on detail, and that position is currently vacant. These roles are assisted by additional Headquarters RM staff and contractor support. The EPA RM Program also receives support from the agency's Senior Agency Official for Records Management (SAORM). The day-to-day implementation and oversight of RM functions are conducted by 23 Records Liaison Officers (RLO) assigned in Program Offices and Regions (with the majority of them at Headquarters) and assisted by a network of Records Contacts (RC) in divisions and programs. The RLOs are mostly full-time positions with areas of responsibility covering multiple states and Tribal Nations and numerous programs and projects. RM responsibilities for RCs are collateral duties, often one of many.

The EPA RM Program is well-managed and complies with federal laws and regulations. Like most RM programs, some areas still need improvement, and others will require continual monitoring to stay effective as changes occur within the agency and as technology advances. The ARO and the RM staff are aware of areas that need improvement and are fully engaged in ensuring the program remains current and promotes continuous improvement.

FINDINGS AND RECOMMENDATIONS

Below, we describe six findings and give seven recommendations for compliance.

Finding 1: The EPA NRMP lacks an RM strategic plan that clearly defines the vision, strategy, goals, and objectives of the agency-wide RM program for managing permanent electronic records.

36 Code of Federal Regulations (CFR) 1222.26(a)(5) requires federal agencies to develop policies, procedures, and strategies for ensuring that records are retained long enough to meet programmatic, administrative, fiscal, legal, and historical needs as authorized in a NARA-approved disposition schedule. The Office of Management and Budget (OMB) Circular A-130 includes specific requirements related to strategic elements of RM programs that are to be included in the agency's Information Resources Management (IRM) Plan. Furthermore, NARA Bulletin 2017-02 lists one of the responsibilities of the SAORM as setting the vision and strategic direction of the agency RM program. Strategic program goals and objectives, supported by senior leaders, are essential to the success of any RM program. The identification, care and maintenance, and transfer of permanent electronic records should be essential parts of that plan.

The EPA Headquarters RM Program needs to approach program objectives strategically with achievable goals. It lacked a documented plan explaining what the program needed to improve, transition, and manage permanent electronic records. The ARO understands the path the program wants to pursue but has yet to formalize the vision, strategy, goals, and objectives that integrate all the EPA RM Program components.

The EPA RM Program must develop, plan, and implement an RM strategy by coordinating and communicating its development and implementation with stakeholders at both Headquarters and Regional Offices. Additionally, the strategy should include a coordinated review of the role of RM in administration, information technology (IT) systems, knowledge management, data collection, and data management. This will assist in improving collaboration among stakeholders and implementing the RM strategy.

While the NRMP holds regular meetings with Headquarters and Regional Office records staff, Headquarters RM activities are not always known by the Regional Offices. It was evident through interviews with the ARO and RLOs that the communication and dissemination of EPA RM policies and other information, including updates from NARA regarding policies, guidance, and regulations, was latent. Creating an EPA RM strategy will improve the coordination and communication synergy needed to manage the transition to electronic recordkeeping at EPA. Without strategic planning for records management, EPA will face challenges in identifying long-term problems and solutions to recordkeeping in a digital environment.

Recommendation 1: The NRMP must develop and approve a comprehensive RM strategic plan that includes the proper management of permanent electronic records. (36 CFR 1222.26(a)(5), OMB Circular A-130, and NARA Bulletin 2017-02)

Finding 2: The EPA's Records Management Policy, Directive No. CIO 2155.5, is outdated.

36 CFR 1220.34(c) requires agencies to issue RM directives or policies establishing program objectives, responsibilities, and authorities for creating, maintaining, and disposing of agency records. Copies of the directives must be disseminated throughout the agency. Having current approved RM directives, policies, procedures, and guidance on managing records, specifically permanent records, is essential to the success of any RM program. Outdated policies that do not reflect current RM activities or business processes put agency records at risk. Policies should be developed with all relevant stakeholders and must address the requirements of the Federal Records Act, 36 CFR Chapter XII Subchapter B, and other applicable guidance issued by NARA and OMB.

The EPA's RM Policy, Directive No. CIO 2155.5, was last updated in August 2021 and applies to all EPA headquarters, regional, laboratory, and other organizations. It documents the agency's policy for managing records in all formats and details roles and responsibilities. Many Regions have created their own RM policies based on this policy and geared them towards their Offices and Programs. However, the EPA's RM Policy still refers to their legacy Enterprise Content Management System (ECMS) and the EZ Desktop Records Application. It is missing more recently published RM memoranda, policies, and guidance. During the inspection, several Regions mentioned that they would be updating their policies because they were outdated. The EPA ARO told them to wait as the NRMP was updating CIO 2155.5 to include the use of the new Agency Records Management System (ARMS) and permanent records digitization guidance, among other information. Until then, staff will use outdated RM policies and other recently issued EPA guidance and procedures.

Recommendation 2: The EPA must update and finalize its RM Policy, Directive No. CIO 2155.5, and disseminate its implementation throughout the agency and to Regional RM staff. (36 CFR 1220.34(c))

Finding 3: Divisions are not designating Records Contacts in accordance with EPA policy.

The EPA ARO leads and manages the agency-wide NRMP, including all lines of business programs, offices, laboratories, and regions. To keep the operational activities of the RM Program functioning, the ARO relies heavily on the support of the Records Liaison Officers (RLOs) and Records Contacts (RCs) to oversee RM responsibilities across the agency. The EPA RM Policy requires Program Offices and Regions to appoint RLOs to provide RM guidance and support to staff and to serve as a liaison with the NRMP. It also states that Assistant Administrators, Chief Financial Officer, General Counsel and Regional Counsel, Inspector General, Regional Administrators, and Laboratory/Center/Office Directors ensure the RLO has adequate skills, resources, time, and appropriate authority to perform the job.

Managers and supervisors are responsible for designating selected staff as RCs at the Division level, at a minimum, in accordance with the EPA RM Policy directive, to aid the RLOs in their responsibilities across the Programs, Offices, and Regions.

In addition, with changing technologies and systems and the emphasis on digital recordkeeping, RM staff must have adequate skill sets to meet the challenges of this evolving and maturing landscape. The EPA briefly touches upon the skill sets of records and information management staff in various agency policies, including CIO 2102: *Senior Information Officials (SIO)*, which establishes the SIO role as being responsible for ensuring the establishment and implementation of processes and procedures related to RM and for ensuring the appropriate development of information and information technology skills of the employees in their organizations—and in CIO 2121-P-03.1: *System Life Cycle Management Procedure,* which requires the RLO to be responsible for ensuring system documentation has properly integrated the EPA's records requirements. However, more must be done to ensure that RM staff have the proper skill sets to meet their RM responsibilities, particularly as they relate to permanent electronic records, as it was not always evident in our interviews.

Recommendation 3: EPA must take steps to ensure that records management responsibilities are assigned appropriately and in accordance with EPA policy to ensure effective controls over the creation, use, and maintenance of federal records. (EPA Directive No. CIO 2155.5, 36 CFR 1220.34(a & d), 36 CFR 1222.34(c))

Finding 4: Records lifecycle management within Microsoft SharePoint and shared drives does not include the necessary RM controls and governance.

Microsoft SharePoint software/application instances and shared drives are managed by EPA IT staff using an IT governance framework with little collaboration with the EPA RM Program on maintaining records. The ARO and RLOs were only included on a limited ad hoc basis in electronic systems design, development, implementation, migration, and decommissioning. They had little say in creating and managing SharePoint sites, for example. The agency allows program offices to create new SharePoint sites as needed, which has led to a proliferation of

SharePoint sites. One Office alone estimated they have over 4000 SharePoint sites, one-third of which had not been used in the past year.

While using SharePoint and shared drives has improved staff efficiency in conducting their work, the sites lack RM controls and governance. Specifically, we found:

- There was no inventory of SharePoint sites and shared drives and little inventory of records maintained in these locations.
- There was often little consistency in how records were maintained, including the use of file naming conventions.
- The records did not contain schedule identifiers and were not labeled as permanent or temporary.

Although staff indicated that they are using SharePoint and shared drives primarily for active working files and collaboration, there is no RM oversight or review to ensure that permanent records are not being maintained there. One regional staff member spoke of reaching out to SharePoint site collection administrators who own the sites to see if specific inactive sites were still needed or if the records could be dispositioned; however, this outreach method did not appear to be widespread. While the EPA maintains policies for managing electronic records and systems and even a new Enterprise Data Management (EDM) Policy, their implementation within SharePoint and shared drives was limited. The EPA needs to improve RM in SharePoint and shared drives through outreach and training on existing RM policy and leveraging the maturing EPA Data Management Program, including data management standards for lifecycle data management.

It is essential that the EPA RM Program oversees SharePoint sites and shared drives from an RM perspective. This will support accountability and ensure consistency in implementing lifecycle processes—similar to those accomplished in legacy or paper processes, align with the EPA policies, and ensure compliance with federal RM statutes and regulations and NARA policy and guidance. Not having any governance of these sites increases the risk of unauthorized dispositions and retaining records longer than needed based on NARA-approved records schedules. This could hinder the EPA's response to Freedom of Information Act (FOIA) requests, litigation requests, and Congressional inquiries.

Recommendation 4: The EPA NRMP, in collaboration with IT must implement controls, governance, and oversight of the records management lifecycle for federal records within SharePoint and shared drives (36 CFR 1236, OMB Circular A-130, and EPA Directive No. CIO 2155.5)

Finding 5: The EPA does not have a consistent, documented process for applying selection criteria to their records as defined in NARA-approved records schedules.

Some records series contain a mix of temporary and permanent records, and some require using what is known as selection criteria to determine which records apply to which category. Selection criteria are often applied to records of voluminous scope, such as case files and research projects. They can include language instructing an agency program to select records

based on historical or programmatic significance. These criteria are typically used to define dispositions for permanent records and will include dispositions for those records not selected as temporary items. Schedule implementation can be difficult, and those with selection criteria have an added layer of complexity. The selection process must be well-defined, deliberate, and clearly articulated by agency guidance and procedures. Without those, there is a risk that agencies will incorrectly apply the records schedules, which could lead to unauthorized dispositions. In addition, agencies may have difficulties when transferring records to the National Archives if the schedules have been misapplied.

The EPA uses records schedules that define selection criteria for agency personnel and provide examples of records to be selected by the program implementing the schedule. For example, the EPA's Compliance and Enforcement Records Schedule, DAA-0412-2013-0017 (known by staff as EPA Records Schedule 1044), and the Environmental Program and Projects Records Schedule, DAA-0412-2013-0021 (EPA Records Schedule 1035), both include an item for historically significant records which have been deemed permanent. The items provided that would meet the historically significant criteria are extensive, running multiple pages. While intended to aid staff when implementing the schedules or managing the records throughout the lifecycle, the lists appeared to be rarely, if ever, used by program staff or RLOs.

No policies or procedures at the EPA detailed who is responsible for determining whether a record met the selection criteria for being historically significant and how this was to be implemented. When asked who was responsible for this action, we received varying responses, including Offices of Regional Counsel, the "most senior person" in a region, program managers, RLOs, and the ARO. A couple of regions mentioned that their Office of Regional Counsel was responsible for determining which *cases* were landmark cases; however, there was no procedure on who was responsible for determining which *records* from those cases met the significant criteria as defined in the EPA records schedule. The ARO clarified that staff should be working with the NRMP to determine if records meet the selection criteria, although the staff we spoke with seemed unaware of this. The process must be formalized and shared with appropriate stakeholders to ensure that records under the permanent disposition authority are not labeled and dispositioned as temporary or vice versa.

Recommendation 5: The EPA must establish and regularly review internal controls to identify and maintain historically significant cases according to the selection criteria. (36 CFR 1226.10, OMB Circulars A-123 and A-130)

Finding 6: The EPA Headquarters RM Program and most Regional RM Programs are not conducting records management evaluations or assessments.

36 CFR 1220.34(j) requires agencies to conduct formal evaluations to measure the effectiveness of records management programs and practices. To be most beneficial, records management evaluations should be conducted regularly and include recommendations for improvement that are monitored for implementation.

EPA Directive No. CIO 2155.5 charges the EPA ARO and the Program Office/Headquarters, Regional, Laboratory/Center/Office RLOs the responsibility of conducting periodic evaluations

to measure the effectiveness of RM programs and practices throughout the agency. While the EPA ARO holds regular meetings with RM staff, including regional RLOs, to discuss RM issues, no formal reviews of RM practices were conducted from a Headquarters level. Only one RLO indicated that they were conducting routine site assessments. These resulted in reports detailing findings, recommendations, and corrective action plans that were then monitored for implementation. One additional RLO was providing onsite RM assistance to staff at Regional sites.

A continuous and robust records management evaluation program is paramount in an organization as large and geographically dispersed as the EPA. Gauging existing and emerging risks can only be done by determining the state of the RM program. Evaluation results can be used as a baseline to gauge improvements. They can also inform senior leaders and other decision-makers of the state of the RM program within the agency and provide invaluable background for strategic planning purposes.

Recommendation 6: The EPA must conduct periodic evaluations or assessments of records management practices throughout the agency and monitor the implementation of corrective action plans. (36 CFR 1220.34(j) and EPA Directive No. CIO 2155.5)

NOTEWORTHY PRACTICES

We also noted three noteworthy projects and initiatives that may interest the federal RM community.

ARMS

The EPA's Agency Records Management System (ARMS), launched in December 2023, is an agency-wide records management services infrastructure that provides electronic records management services and search capabilities for OneDrive files, Outlook email, and digitized paper records. ARMS utilizes machine learning (ML) to select record schedules based on EPA file plans and applies retention based on disposition dates. The ARO can generate reports to determine user adoption and the percentage and types of records maintained there. The agency is working on an Application Programming Interface (API) that will connect agency systems, such as the Superfund Enterprise Management System (SEMS), to ARMS for managing and disposing of records. The agency has created several training offerings and tips on using ARMS to aid user adoption and understanding and hosted open office hours.

Establishment of National Digitization Centers

As part of the EPA's National Digitization Program (NDP), the agency has established two National Digitization Centers (NDC) to digitize permanent and long-term temporary analog records systematically. The first NDC, which opened in May 2024, is a 15,000-square-foot facility holding approximately 10,000 boxes for digitization. The second NDC is much larger at 80,000 square feet and will hold approximately 75,000 boxes for digitization once open. The facilities have state-of-the-art scanning equipment and well-documented procedures to ensure that the digitized records meet 36 CFR 1236; NARA's format guidance in NARA Bulletin 2014-04, Appendix A: Tables of File Formats; as well as the goals of OMB/NARA M-23-07, *Update*

to Transition to Electronic Records. Their procedures include the Paper Asset Tracking Tool (PATT), an in-house built, one-stop workflow process for the request of records digitization and the shipping, tracking, and scanning records into ARMS.

CDO and RM Coordination

The Enterprise Data Management (EDM) Program was established through EPA Directive No. 2135.3. The EDM Program comprises approximately 23 component data officers, led by the Chief Data Officer (CDO), who has been in the role for over four years. The EPA has assigned the program to an appropriate office within the agency's organizational structure alongside the RM Program. The Data Management Council (DMC) within the program is a cross-functional, executive-level group representing all business and technical stakeholders that prioritizes initiatives, aligns resources, makes policy decisions, and defines the data management strategy for the organization. The EDM program has received senior management support and clearly understands program objectives, responsibilities, and authorities.

While still in the early stages of developing the program, the CDO understands the linkages between DM and RM and wants to build on these relationships. Strong collaboration has come from the SIO (SAORM) and other RM personnel serving on data management boards. The CDO also plans to create data stewards for the data lifecycle, including records. This provides an additional opportunity for collaboration between data stewards and RLOs.

In many ways, DM and RM at the EPA work in tandem toward their respective goals and objectives. The CDO and the ARO understood working together on data/records issues should result in more effective outcomes and may reduce some duplication of effort. It is also important that both programs work together to determine how long the data is needed for business purposes, not only to comply with NARA-approved agency records schedules but also because maintaining data longer than necessary makes the search for timely information more difficult. Understanding these foundational connections, whether phrasing it in terms of compliance or a business value proposition, will be key to building on those relationships and success in the future.

CONCLUSION

The EPA RM Program is well on its way to becoming fully electronic. While many noteworthy initiatives are taking place at the EPA, initiatives that may be of interest to the broader federal RM community, there are still several opportunities for improvement, as detailed above. The findings and recommendations in this inspection report are meant to assist the EPA in ensuring that agency records are

- readily available to support mission-essential functions
- being managed effectively throughout the records lifecycle
- accessible to the American people through their eventual transfer to the National Archives

APPENDIX A
INSPECTION PROCESS

Objective and Scope

Our objective was to determine the EPA's compliance with federal RM statutes and regulations and adherence to and effectiveness of agency RM policies, procedures, and guidelines, particularly concerning permanent records.

We focused on the coordination of RM program implementation across the EPA, specifically between the EPA Headquarters Offices and its Regional Offices, with emphasis on

- RM policies and procedures
- implementation of electronic recordkeeping systems
- strategic planning
- digitization
- records schedule implementation
- oversight

Additionally, we identified practices of interest to the broader federal RM community.

Methodology

Our methodology was interviewing RM and program staff using onsite visits and video conferences in July-September 2024.

We conducted in-person interviews at the following EPA regional components:

- Region 2-New York City
- National Digitization Center-Edison, New Jersey
- Region 6-Dallas
- Region 8-Denver
- Region 5-Chicago

We also conducted virtual interviews with EPA Headquarters and other offices that included:

- RM Program Office-ARO, RLOs, SAORM, and other RM supporting staff
- Chief Data Officer
- Office of Research and Development
- Office of Air and Inspection
- Office of Land and Emergency Management
- Office of Air and Radiation
- Region 3-Philadelphia
- On-Scene Coordinators
- EPA Web Council

In addition, we

- reviewed RM policies, procedures, and other documentation provided by the EPA
- used a checklist based on federal statutes and regulations and NARA guidance to conduct our reviews
- reviewed responses to the
  - Records Management Self-Assessment (RMSA)
  - Federal Electronic Records and Email Management (FEREM) Report
  - Senior Agency Official for Records Management (SAORM) Annual Report
- reviewed internal NARA data on agency records schedules and implementation

Follow-Up Actions

The EPA will submit to NARA a

- Plan of Corrective Action (PoCA) that addresses each inspection report recommendation
- a timeline for completion of each proposed action
- 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 EPA. Upon receipt, NARA will

- analyze the adequacy of the PoCA
- provide comments within 60 calendar days
- assist in implementing recommendations

Progress reports on implementing the EPA's PoCA must be submitted to NARA until all actions are completed.

APPENDIX B
RELEVANT INSPECTION DOCUMENTATION

We reviewed the following documentation from the EPA:

- Organizational charts
- RM policies, procedures, manuals, standards, and other RM-related issuances relating to the management of permanent records
- Internal controls or guidance used to manage permanent records
- Permanent records schedules
- Records management systems configuration management, data architecture, technical documentation, procedures, and training
- Systems Life Cycle Management policies and procedures
- Metadata standards and practices in use for permanent records
- Departing staff exit clearance procedures and/or checklist
- RM and other meeting agendas
- RM newsletters, advisories, campaign notices, reminder emails, and other outreach materials
- Email policies and procedures
- Records digitization procedures
- Social media and web policies
- Quality Management and Quality Assurance plans and standards
- Enterprise Data Management policies
- Controlled Unclassified Information policies and procedures
- Documentation of RM training related to the transition to electronic recordkeeping and the management of permanent records

APPENDIX C
AUTHORITIES

This appendix explains further relevant information for this inspection:

- Authorities
- Statutes and Regulations
- Other Guidance

Authorities

The authorities given to NARA to conduct this inspection consist of three regulations and statutes:

- 44 U.S.C. Chapter 2904(c)(7) and 2906
- 36 CFR Chapter XII, Subchapter B
- 36 CFR 1239, Program Assistance and Inspections

Statutes and Regulations

Statutes and regulations require agencies to maintain compliant records management programs. 36 CFR Chapter XII, Subchapter B, specifies policies for federal agencies' records management programs relating to:

- proper records creation and maintenance
- adequate documentation
- records disposition

The regulations in this Subchapter implement the provisions of 44 U.S.C. Chapters 21, 29, 31, and 33.

At a high level, agency heads are responsible for ensuring

- adequate and proper documentation of agency activities (44 U.S.C. 3101)
- effective controls over the creation, maintenance, and use of records (44 U.S.C. 3102(1))
- compliance with NARA guidance and regulations
- 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))

NARA provides additional policy and guidance to agencies online at:
http://www.archives.gov/records-mgmt/.

Other Guidance

Other guidelines we used to conduct this inspection are the following:

- OMB/NARA *Transition to Electronic Records* (M-19-21) memorandum
- OMB/NARA *Update to Transition to Electronic Records* (M-23-07) memorandum
- other NARA Bulletins currently in effect: https://www.archives.gov/records-mgmt/bulletins

APPENDIX D
ACRONYMS AND ABBREVIATIONS

API	Application Programming Interface
ARMS	Agency Records Management System
ARO	Agency Records Officer
CDO	Chief Data Officer
CFR	Code of Federal Regulations
CUI	Controlled Unclassified Information
DM	Data Management
DMC	Data Management Council
ECMS	Electronic Content Management System
EDM	Enterprise Data Management
EDMP	Enterprise Data Management Policy
EPA	U.S. Environmental Protection Agency
FEREM	Federal Electronic Records and Email Management Report
FOIA	Freedom of Information Act
IRM	Information Resources Management
IT	Information Technology
ML	Machine Learning
NARA	National Archives and Records Administration
NDC	National Digitization Centers
NDP	National Digitization Program
NRMP	National Records Management Program
OMB	Office of Management and Budget
OMS	Office of Mission Support
ORASE	Office of Records, Administrative Systems and eDiscovery
PATT	Paper Asset Tracking Tool
PoCA	Plan of Corrective Action
RC	Records Contact
RLO	Records Liaison Officer
RM	Records Management
RMSA	Records Management Self-Assessment
SAORM	Senior Agency Official for Records Management
SEMS	Superfund Enterprise Management System
SIO	Senior Information Officials
U.S.C.	United States Code

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