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Department of the Navy
Enterprise-Wide Electronic Records Management Systems

Records Management Inspection Report

National Archives and Records Administration
September 15, 2016

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EXECUTIVE SUMMARY

The National Archives and Records Administration (NARA) is responsible for assessing the proper management of records in all media to protect rights, assure government accountability, and preserve and make available records of enduring value.¹ In this capacity, and under 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, if necessary, to make improvements to their programs based on inspection findings and recommendations.

In 2015, the National Archives and Records Administration inspected limited aspects of the electronic records management program of the Department of the Navy (DON). The primary purpose of this inspection was not to audit DON's compliance with NARA's regulations; rather, it was to review DON's current electronic recordkeeping systems in light of Federal regulations, NARA guidance, its own policies, and best industry practices, as well as to assess, in a preliminary way, how its new system under development will address some of the shortcomings of the current ones. That said, the NARA inspection team was alert for any signs of noncompliance with the Code of Federal Regulations (CFR) and found none of significance. However, any statement about the DON's general compliance with the regulations surrounding the management of electronic records is beyond the scope of this effort.

NARA conducted this inspection to assess whether the Department's decade-long adoption of Total Records and Information Management (TRIM) - a large scale, enterprise-wide electronic records management system (ERMS) - has enabled more compliant management of electronic records throughout the organization. Specifically, NARA sought to inspect the DON program at this time because, after 11 years in use, it is replacing TRIM in favor of a new system, built from Alfresco software, called Department of the Navy Tasking, Records and Consolidated Knowledge Enterprise Repository (DON TRACKER). As DON was an early adopter of a Department of Defense (DoD) Standard 5015.2-compliant system² and maintains one of the largest ERMS in the Federal Government, NARA sought to evaluate:

- The challenges DON faced in planning, developing, implementing, maintaining, and now decommissioning the TRIM system;
- DON's views on how electronic records management within the organization will be improved by switching to DON TRACKER; and
- How both the legacy TRIM system and the new ERMS will help DON achieve the goals of the Office of Management and Budget (OMB)/NARA *Managing Government Records Directive* (M-12-18) items 1.1 and 1.2, which require that agencies manage all permanent electronic records electronically by 2019 and manage all email records in an accessible electronic format by 2016.

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

² The full name of the DoD Standard 5015.2 is "Design Criteria Standard for Electronic Records Management Software Applications."

Executive Summary

During the course of this inspection, NARA found that there were shortcomings with DON's enterprise-wide TRIM implementation and that the nature of what the DON itself has called its "distributed and disconnected" electronic records management programs has left parts of the organization at risk of being noncompliant with DON electronic records management policy and guidance. The Navy and Marine Corps records management staff are aware of these problems and are taking steps to mitigate them by implementing the new DON TRACKER and working formally with their respective Inspectors General to identify and address areas of noncompliance. NARA also found user adoption of DON TRACKER to be the biggest outstanding question when it comes to the long-term success of the new ERMS.

As DON is remediating the shortcomings of TRIM, and as DON TRACKER implementation is proceeding in phases, this report makes only one recommendation: that the DON update the Navy's Records Manual (SECNAV M-5210.1) with instructions that align with its new policy for managing email electronically. There are, however, other areas of concern that NARA will be interested in following up on:

- The current state of electronic records management in the DON is diffuse and disconnected with too many silos of information. DON TRACKER is the DON's solution to improve significantly enterprise-wide electronic records management;
- DON TRACKER must avoid the TRIM implementation shortcomings, noted in this report and already acknowledged by the DON, for it to be successful;
- There are significant hurdles and challenges, noted in this report, to the enterprise-wide implementation and adoption of DON TRACKER. Other challenges may surface as the new system moves further along in its development;
- DON records management (RM) staff and the contractors who are developing DON TRACKER should continue their close collaboration;
- User adoption will be a challenge given the size of the DON, its global footprint, and the number of systems DON TRACKER will be replacing;
- The U.S. Navy and Marine Corps have identified challenges to RM policy and guidance compliance and have partnered with their respective Inspectors General to address these challenges;
- The migration of records into DON TRACKER will take meticulous planning and careful execution. Navy has started this work with the DON TRACKER contractors;
- Implementing the Capstone approach to email management will be very complex for an organization the size of the DON. The way DON TRACKER handles email capture and preservation will be critical. The current design options are interesting and, if successful, could inform similar system implementations at other Federal agencies.

NARA will monitor the results of the compliance work that U.S. Navy and Marine Corps records managers are carrying out in conjunction with their respective Inspectors General and will monitor progress towards implementation of DON TRACKER. NARA will follow up on this inspection in the future to evaluate the success of the new system in improving electronic records management at the DON and in meeting the M-12-18 goals.

Executive Summary

In a separate but related project, NARA is working with DoD Records Management to develop a comprehensive plan to inspect DoD services and components beginning in FY 2017. NARA will inspect the DON again as part of that project.

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**DEPARTMENT OF THE NAVY
ENTERPRISE-WIDE ELECTRONIC RECORDS MANAGEMENT SYSTEMS
RECORDS MANAGEMENT INSPECTION REPORT**

INTRODUCTION

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⁴ The full name of the DoD Standard 5015.2 is "Design Criteria Standard for Electronic Records Management Software Applications."

12-18) items 1.1 and 1.2⁵, which require that agencies manage all permanent electronic records electronically by 2019, and manage all email records in an accessible electronic format by 2016.

BRIEF AGENCY DESCRIPTION

The Department of the Navy is the naval warfare branch of the U.S. military. It is a vast organization with installations all over the globe, employing about 900,000 military, government civilian, and contractor personnel. It consists of five main entities: Office of the Secretary of the Navy, Office of the Chief of Naval Operations, Commandant of the Marine Corps, Operating Forces, and the Shore Establishment. The mission of the U.S. Navy is to “maintain, train and equip combat-ready naval forces capable of winning wars, deterring aggression and maintaining freedom of the seas.”⁶

The Secretary of the Navy (SECNAV) conducts all the affairs of the Department of the Navy, including recruiting, organizing, supplying, equipping, training, and mobilizing. The Secretary also oversees the construction, outfitting, and repair of naval ships as well as other equipment and naval facilities. SECNAV is responsible for the formulation and implementation of policies and programs consistent with objectives established by the President and the Secretary of Defense. Both the Chief of Naval Operations (CNO) and Commandant of the Marine Corps (CMC) report directly to the Secretary of the Navy.

The CNO is the senior military officer of the U.S. Navy. The CNO is responsible to the Secretary of the Navy for the command, utilization of resources, and efficiency of Operating Forces and the Shore Establishment. The Office of the Chief of Naval Operations (OPNAV) includes the Chief of Naval Operations, the Chief of Legislative Affairs, the Director of Naval Nuclear Propulsion, the Master Chief Petty Officer of the Navy, and other functional staff offices.

The Operating Forces (also known as “the Fleet”) take on the role of force provider. They do not carry out military operations independently but train and maintain naval units that are provided to each of the Unified Combatant Commands. Operating Forces consist of eight components: Fleet Forces Command, Pacific Fleet, Naval Forces Central Command, Naval Forces Southern Command, Naval Forces Europe, Fleet Cyber Command, Navy Reserve, Naval Special Warfare Command, and Operational Test and Evaluation Force.

The mission of the Shore Establishment is to deliver material, services, and personnel to the Operating Forces. The Shore Establishment maintains facilities for the repair of machinery and electronics; communications centers; training areas and simulators; storage areas for repair parts, fuel, and munitions; medical and dental facilities; and air bases. Shore Establishment commands report to an Echelon II command. Commanders of U.S. Navy Echelon II commands report directly to the CNO. Some of Navy’s Echelon II commands include Naval Education and Training, Naval Meteorology and Oceanography, Space and Naval Warfare Systems, Naval

⁵ OMB/NARA *Managing Government Records Directive (M-12-18)*, <https://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>.

⁶ <https://www.navy.com/about/mission.html>.

Facilities Engineering, Naval Supply Systems, Naval Air Systems, Naval Sea Systems, Bureau of Medicine and Surgery, and Bureau of Naval Personnel.

The U.S. Marine Corps has been part of the DON since 1834. The CMC is responsible for organizing, recruiting, training, and equipping the Corps. The Marine Corps is organized into four principal subdivisions: Headquarters Marine Corps, the Operating Forces, the Supporting Establishment, and the Marine Forces Reserve.

INSPECTION OBJECTIVE

The objective of this inspection was to ascertain the extent to which DON's adoption of a DoD Standard 5015.2-compliant ERMS led to improvements in its management of electronic records and increased adherence to regulations surrounding the management of electronic records as codified in 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B.

SCOPE AND PURPOSE

This inspection broadly examined aspects of DON's standards, policies, procedures, and practices in relation to:

- The planning, development, implementation, operation, and now retirement of its current records management application, TRIM;
- The adoption process (planning, development, and implementation) of its new record management system for electronic records, DON TRACKER;
- The management of email records in accordance with item 1.2 of the 2012 OMB/NARA *Managing Government Records Directive* (M-12-18), which requires that agencies manage all email records in an accessible electronic format by 2016; and
- The handling of permanent electronic records consistent with item 1.1 of the 2012 OMB/NARA *Managing Government Records Directive* (M-12-18), which requires that agencies manage all permanent electronic records electronically by 2019.

This inspection was not intended as a comprehensive compliance assessment of the DON's records management program or of the entirety of its electronic records management program.

METHODOLOGY

This inspection was conducted using a combination of site visits, teleconferences, and a review of documents received. While this was not a comprehensive compliance assessment, the NARA team adhered to its established process and procedures for conducting an agency inspection.

- The inspection team used a detailed checklist based on Federal statutes, regulations, and NARA guidance. For selected questions from this checklist, see Appendix D.
- The inspection team reviewed the DON's responses to the annual Records Management Self-Assessment (RMSA) from 2009 through 2014 and the Senior Agency Official (SAO) for Records Management Annual Report from 2013 and 2014.

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- The DON provided documentation of records management policies; procedures; training curriculum; technical and planning documentation for TRIM; and technical and planning documentation for DON TRACKER. For a summarized list of documents, see Appendix A.
 - The NARA inspection team went on multiple site visits including visits to several commands housed at the Norfolk Naval Station; commands at Marine Corps Base Quantico; the office of the DON TRACKER contractor in Manassas, Virginia; and the Pentagon. For a complete list of site visits, see Appendix C.

STATUTES AND REGULATIONS

36 CFR Chapter XII, Subchapter B, specifies policies for Federal agencies' records management programs relating to proper records creation and maintenance, adequate documentation, and records disposition. The regulations in this Subchapter implement the provisions of 44 U.S.C. Chapters 21, 29, 31, and 33.

The Federal Records Act requirements for Federal agencies are found in 44 U.S.C. Chapter 31, Records Management by Federal Agencies. At a high level, agency heads are responsible for ensuring:

- 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)).

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

STRUCTURE OF THE REPORT

This report contains:

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

INSPECTION RESULTS SUMMARY

IMPLEMENTATION AND DEVELOPMENT OF TRIM – A BROAD OVERVIEW

DON's implementation of TRIM never developed into a fully integrated, enterprise-wide records management (RM) solution but was a significant step towards that goal. In 2002, the DON selected TRIM as its enterprise-wide ERMS, putting the organization on course to become the "the world's largest electronic records management customer."⁷ At that time, a DON ERMS Working Group performed an extensive evaluation of the software and other products to determine their suitability as a Department-wide ERMS. The DON found that TRIM provided for the management of electronic records according to the DoD standard and DON policy (SECNAVINST 5212.5D). Furthermore, the DON felt that the software ranked favorably in terms of "usability, functionality, reliability, cost, compatibility, scalability, evolution, value ... and ability to integrate with Microsoft's product line and leading database management systems."⁸

TRIM, now called HP Records Manager, is a DoD Standard 5015.2-compliant, electronic document and records management system (EDRMS) based on technology from Hewlett-Packard's 2008 acquisition of TOWER Software. TOWER began providing electronic document and records management software with the release of TRIM Captura in 1998. The company contributed to the development of international and local records management standards, including the review of the DoD Standard 5015.2.

The Marine Corps' Gray Research Center (GRC) and the Navy History and Heritage Command (NHHC), two organizations with archival missions, actually were using TRIM prior to its adoption enterprise wide. GRC implemented TRIM Captura as early as 2001 to catalog and track submissions of Marine Corps Command Chronologies. NHHC, an Echelon II organization that preserves artifacts and documents related to the history of the U.S. Navy, acquired TRIM later to catalog its collections to the level of folder/reel/media storage device. GRC and NHHC are still active users of TRIM and have no immediate plans to transition from the software.

An enterprise-wide ERMS only became a possibility for the Navy in the early 2000s when the organization greatly expanded the reach of its Navy Marine Corps Intranet (NMCI) to 200,000 seats, making it the world's largest intranet. Navy's records management staff saw the expansion of the NMCI as an opportunity to make available to a large portion of the DON an electronic records management system and campaigned successfully to have TRIM integrated into the intranet. Until then, there were no electronic records management tools widely used in the DON.

Not all Navy personnel have access to NMCI, which means not all have access to TRIM. NMCI is largely operative in the contiguous United States (CONUS) as well as Alaska, Hawaii, and Japan. It is not available aboard ships or in most locations outside the contiguous United States (OCONUS). The Marine Corps, part of the Department of the Navy, stopped using the NMCI in 2013 and maintains its own separate intranet.

⁷ "Department of the Navy Enterprise-Wide Electronic Records Management," *CHIPS: The Department of the Navy's Information Technology Magazine* (July-September 2002).

⁸ *Ibid.*

These major exceptions notwithstanding, the NMCI reach is broad and includes today more than 700,000 users in 3,000 locations. According to the Navy, the NMCI represents 70 percent of all DON Information Technology (IT) operations and as a computer network is second only to the public internet in its size.⁹

It took another three years after selection of the software before TRIM was in use within the DON. The first elements of the Navy (commands) to implement the enterprise-wide version of TRIM volunteered to do so. Records management contractors initially trained TRIM administrators within these organizations and assisted them in customizing datasets. Once TRIM administrators received training and stood up systems within their own programs, they were expected to train administrators in lower echelons within their command structure. After two years of hosting TRIM on the NMCI, Navy had deployed the software across 30 Echelon II commands, trained 10,000 staff in its use, and captured more than 500,000 electronic records from across the DON in both Secret Internet Protocol Router Network (SIPRNET) and Non-Secure Internet Protocol (IP) Router Network (NIPRNET) versions of TRIM.¹⁰

DON points, in particular, to two early success stories in its enterprise-wide adoption of TRIM: one related to Hurricane Katrina Records, the other to Base Realignment and Closure (BRAC) records. According to the DON, TRIM served as “a successful rapid response mechanism through which 2,900 Hurricane Katrina records were retrieved and safeguarded.” Also, DON credits TRIM with its successful management of over 10,000 BRAC program records, related to three rounds of base closings in 1993, 1995, and 2005, most of which were entered via a high speed scanning operation.¹¹

NARA acknowledged DON’s progress in managing its electronic records, giving the organization an Archivist Achievement Award in 2007 for its implementation of TRIM. Allan Weinstein, Archivist of the United States at the time, said in bestowing the award that the Department of the Navy Records Office showed vision in providing the DON with “powerful tools for records management.”¹² The 2007 acknowledgement by NARA notwithstanding, the DON’s ambitious initial roll out of a 5015.2-compliant system was not so much a final destination as a major step on the way to a fully integrated enterprise-wide RM solution.

⁹ <http://www.public.navy.mil/spawar/PEOEIS/NEN/NMCI/Pages/AboutUs.aspx>.

¹⁰ SIPRNET is a system of interconnected computer networks used by the Department of Defense (DoD) and the Department of State to transmit classified information (up to and including information classified Secret). NIPRNET is a private IP network used to exchange unclassified information owned by DoD and created and managed by the Defense Information Systems Agency.

¹¹ <http://www.archives.gov/about/speeches/2007/05-8-07.html>.

¹² Ibid.

NAVY ELECTRONIC RECORDKEEPING OUTSIDE OF TRIM

TRIM is not the only ERMS used within the Navy. Some commands have systems for managing electronic records that predate Navy's adoption of TRIM, which they continue to use under waivers granted by the DON Directives and Records Management Division (DRMD). For example, Naval Sea Systems Command (NAVSEA) implemented a system called Corporate Document Management System (CDMS) in 2000.¹³ According to the contractor that built CDMS, the system replaced eight separate headquarters legacy systems, contains 1.7 million documents - including a million pages of scanned paper files and drawings - and has more than 10,000 users.¹⁴ NAVSEA continues to use the system along with TRIM.

There are other parts of the Navy that do not employ TRIM or any other 5015.2-compliant system for managing records. It has already been mentioned that TRIM, for the most part, is unavailable outside the United States or aboard ships.

MARINE CORPS AND TRIM

The Marine Corps never adopted TRIM or any other 5015.2-compliant system enterprise-wide. In general, electronic recordkeeping at Marine Corps is more decentralized than in other parts of the DON. Staff often set up ad hoc SharePoint systems in the field to manage records at times without the knowledge of headquarters records management.

To help standardize the various and dispersed SharePoint systems and introduce better records management, Marine Corps headquarters records management developed a SharePoint configuration called Marine Corps Tool for Information Lifecycle Management (MCTILM). MCTILM was first used in 2012 to capture war records in Afghanistan. The Marine Corps set up 49 sites in country and collected 125 terabytes of data, representing 30 different record types. Successful in Afghanistan, the Marine Corps has begun to roll out MCTILM on the garrison (non-deployed) side. While MCTILM is not 5015.2 compliant, it appears to be working as an interim solution. Many in the Marine Corps are seeing the advantages of the MCTILM configuration, and the records management staff are setting up as many of these configurations as they are able given limited resources.

TRIM – EXTENT OF ADOPTION AND USE WITHIN THE DON

Significant parts of the DON organization use TRIM effectively and have integrated it into their business processes. As of today, Navy maintains 42 separate datasets within TRIM. Each dataset represents a command using the system. According to Navy records management staff, there are 10 terabytes of data within the NIPRNET version of TRIM and 12 million individual records under management in the NIPRNET and SIPRNET systems combined. Most of the commands using TRIM are Echelon II and above. Adoption of TRIM in Echelon III, IV, V, VI, and VII commands has been more sporadic.

¹³ <http://www.govexec.com/federal-news/2000/05/naval-command-sets-sights-on-digital-future/6598/>.

¹⁴ <http://www.bcinow.com/ContentView.aspx?ID=4806>.

Three organizations are responsible for the bulk of the documents managed by TRIM - Naval Supply System Command (NAVSUP), Space and Naval Warfare Systems Command (SPAWAR), and Bureau of Naval Personnel (BUPERS). Together these organizations have managed over five million documents in TRIM since 2005. Usage of TRIM by these entities and others has increased steadily since 2008, demonstrating that over time a number of commands are integrating the system into their business processes.

The NARA inspection team met with the largest user of TRIM within the DON: Fleet Logistics Center Norfolk (FLCN), Navy Household Goods Program, and saw how they successfully implemented the records management software in response to changing business needs stemming from Joint DoD Regionalization/Consolidations. Under DoD Regionalization, FLCN was required for the first time to move troops from other services, which necessitated sharing documents across widely dispersed offices. TRIM provided them with a good solution for document access and sharing. In this case, business needs drove the adoption of TRIM, and RM was a secondary concern. However, FLCN appreciated that TRIM was an official recordkeeping system and expressed concern that the new United States Transportation Command (USTRANSCOM) Solution for DoD Personal Property system that they will soon be required to use does not have records management functionality.

Despite the evident successes of the TRIM rollout for large portions of the DON, it falls short of being a completely integrated, enterprise-wide RM solution. The DON itself estimates that TRIM is only “accessible to roughly 50% of DON personnel.”¹⁵ The limited reach of TRIM has to do in large part with its unavailability outside the United States. But, as stated, there are other limiting factors, including lack of adoption by the Marine Corps, competing legacy RM systems, and uneven adoption in the lower echelon commands of the U.S. Navy.

DON’s own assessment is that as an organization it has lacked an effective enterprise capability when it comes to electronic records management. As a result, “DON organizations ... implement their own [RM] processes and systems” leading to programs that are “distributed and somewhat disconnected.” Furthermore, DON has concluded that “the lack of a readily accessible and user-friendly RM system across the DON is a major contributor to unfavorable compliance with policy and guidance.”¹⁶

TRIM POLICY AND PROCEDURES AT NAVY

All Chief of Naval Operations commands on the NMCI are directed to use TRIM for the storage and management of official electronic records.¹⁷ As stated previously, commands can request waivers to use other systems. While TRIM comes loaded on all computers connected to the NMCI, commands do need to arrange and pay for their own storage of documents within TRIM. In standing up TRIM, commanders of Echelon II organizations typically appoint in writing a TRIM Dataset Records Manager (DRM). The DRM is responsible for maintaining the dataset

¹⁵ “Department of the Navy Tasking, Records and Consolidated Knowledge Enterprise Repository (DON TRACKER) Business Case Analysis (BCA),” 04 March 2013.

¹⁶ Ibid.

¹⁷ DON CIO memo, “DON Electronic Records Management and Electronic Mail (E-Mail) Management,” dated June 15, 2007.

and customizing it to reflect the command organization, developing TRIM business rules for use, controlling access to records in the dataset, providing guidance to the TRIM administrators beneath them, serving as liaison between OPNAV and Echelon III TRIM administrators, monitoring TRIM usage and developing metrics, providing access to TRIM for new employees and removing access to departing employees, and serving as a first line of support to end users within their command. Echelon III commands typically appoint TRIM administrators who organize their command's section of the dataset, ensure all folders and documents in their area of responsibility have proper Standard Subject Identification Codes (SSICs) and security settings applied to them, work with the Echelon II DRM to provide access and appropriate permissions to TRIM for new employees and remove access to departing employees, and serve as first line of support to end users within their command.

The DRMD supports commands' use of TRIM by allocating them their own TRIM repositories and by providing TRIM training and technical assistance. In setting up a repository, records staff pre-populate each repository with: (1) all SSICs; (2) DON retention and disposition in accordance with the Navy Records Manual (SECNAV Manual M-5210.1); (3) DON thesaurus catalog; (4) enterprise and organizational security profiles; (5) security policy for records; and (6) standard record type templates.

Initially, DRMD offered two web-based TRIM training courses on Navy Knowledge Online (NKO): "TRIM Context via the NMCI (Entry Level)" and "TRIM Context via the NMCI (Advanced)." Many commands have policies requiring staff appointed as TRIM administrators to take both TRIM courses. Some commands, like the Navy Supply System Command, require all staff and contractors on the NMCI to take the entry level TRIM class, although this requirement does not appear to be widespread and may depend on business need. DRMD also maintains a TRIM help line staffed by a contractor.

According to DRMD, the U.S. Navy recently combined the entry-level and advanced TRIM courses into one course. The policies of many commands have not been updated to reflect this change and still require staff and contractors to take one or both classes depending on administrative role. The planned sun-setting of TRIM may make updating of this policy unnecessary.

DON TASKER SYSTEMS AND THE DEVELOPMENT OF DON TRACKER

In 2014, the DON announced that it would be discontinuing its use of TRIM in favor of a new combined task management and records management application built from Alfresco software and called DON TRACKER. The idea behind DON TRACKER is to consolidate all DON tasking systems into one and to integrate those systems with records management. DON TRACKER is a collaborative initiative driven by the DON Assistant for Administration, DON Chief Information Officer (DON CIO), Director of Marine Corps Staff (DMCS), Director of Navy Staff (DNS), and the Sea Warrior Program (PMW 240). The DON Records Officer reported that the Records Management Division was not involved significantly in the initial conception of the new system or in the decision making process that led to the selection of the new software. However, the Division has no objections to the DON TRACKER project and has

been working with the system developers closely to ensure that records management lifecycle requirements are incorporated into DON TRACKER.

Much of the DON's work is accomplished through the assigning and tracking of effort via task management systems. In these systems, Navy and Marine Corps delegate and monitor their work while collecting related communications and documentation. The DON reports that currently it has about 23 individual tracker systems.¹⁸ Some of these systems include OPNAV's tasker system (Navy Taskers/TV5), Congressional Information Management System (CIMS), and Marine Corps Action Tracking System (MCATS). These tasker systems are discrete, and when taskers need to move between systems, it is accomplished manually. While electronic records, including email, are retained in various tasking systems, the systems have no built-in records management functionality.

As staff members work taskers, "packages" are created that contain many of the most important Navy records. All policy documents, for example, reside in tasker packages and most of these are permanent records. Currently, these packages have to be migrated out of tasker systems (typically into TRIM) to be managed according to approved disposition authorities. Since DON TRACKER includes a certified RM repository, the new system will obviate the need for migration of records out of tasker systems, allowing for the management of packages in the same environment in which they are created. DON believes that this close marriage of business processes and records management will allow for less cumbersome and more effective records management.

As stated, DON has chosen Alfresco software as the platform for DON TRACKER. Founded in 2005, Alfresco is an electronic content management firm specializing in integrating "enterprise content management" with "enterprise business process management." DON has determined that Alfresco has the task management and workflow functionality it needs to effect the consolidation of tracking systems and electronic records management. Furthermore, Alfresco is web-based, which will allow for DON TRACKER to be both a CONUS and OCONUS system, mitigating a major limitation in the TRIM rollout. Also, in contrast to TRIM, Alfresco is implemented as a thin client, which requires no installed software on end-users' desktops.

The planning that Navy has done in developing DON TRACKER appears to be thorough and detailed. NARA conducted an in-depth review of the DON TRACKER project documents provided by DON and found them to be comprehensive. All aspects of the software development lifecycle seem to be well planned. Based upon review of these planning documents, DON seems to be mitigating risks for potential project challenges in the future.

PLANNED MIGRATION OF RECORDS INTO DON TRACKER

DON has created an extensive data migration plan for legacy records as part of its initial project plan for DON TRACKER. The plan has specific interim and final deliverables for migration activities. Based upon interviews with DON's Alfresco contractors, it appears that records migration is not only part of the overall implementation plan, but is being developed and conducted on a sequential, case by case basis during initial deployment of DON TRACKER

¹⁸ This number includes records management systems such as TRIM.

within organizational units. The contractors have developed enterprise-wide metadata standards that will be used as a basis for the initial migration. They are incorporating additional metadata requirements and developing custom scripts to streamline migration from legacy systems and storage. NARA has determined that this approach provides the least amount of risk for migrating legacy electronic records and metadata into DON TRACKER.

POSSIBLE SIGNIFICANT HURDLES IN IMPLEMENTING DON TRACKER

DON's business case for the creation of DON TRACKER appropriately points to many of the DON's current issues with tasking systems and electronic records management. The current state of electronic records management in the Department is diffuse and disconnected with too many silos of information. DON TRACKER has the potential to consolidate and replace the DON's various tasking systems and to integrate records management functionality. Despite the obvious advantages of centralizing tasking and records management functions, the DON will face significant hurdles in implementing the system.

In particular NARA sees two significant challenges:

- *Alfresco is not yet 5015.2-certified for classified information*

A possible concern with Alfresco, when it comes to Navy's use of the software, is that it is not DoD-certified for handling classified records. Navy reports that Alfresco is in the process of seeking DoD certification in this regard. Until such time, the SIPRNET instantiation of TRIM will not be replaced by DON TRACKER. This is of particular concern because the business case for DON TRACKER hinges on consolidating competing legacy ERMSs. This consolidation will not be possible if the new system is not capable of handling DON's classified information. However, DON TRACKER will provide significant consolidation of unclassified systems.

- *DON TRACKER and Organizational Adoption*

User adoption will be a challenge given the size of the DON, its global footprint, and the number of systems DON TRACKER will be replacing. The DON is a large, geographically dispersed, complex organization with a federated structure and, if the history of Navy's development and adoption of TRIM is any indication, the consolidation of electronic recordkeeping into a single ERMS will be a major challenge. TRIM was one of the largest implementations of an ERMS by any organization, yet, by Navy's own assessment, TRIM is accessible to only half of the DON, and only a modest subset of those with access are actually using the system. Legacy ERMSs remain operational, many electronic records sit unmanaged in tasker systems or minimally managed in SharePoint systems, and intellectual control of records OCONUS remains a major challenge. Even after a full decade of having TRIM as its enterprise-wide ERMS, Navy itself describes its electronic recordkeeping programs as "distributed and disconnected." The ERMS part of DON TRACKER is planned to be three times the size of the TRIM roll out, and its success may depend on the extent to which the DON will be able to

control the numerous legacy information/tasking systems throughout the organization - something they were unable to do with TRIM.

Not surprisingly there is evidence of cultural resistance to the DON TRACKER initiative. During NARA site visits, staff responsible for developing and maintaining tasker and/or records management systems targeted to be replaced by DON TRACKER expressed frank, and understandable, trepidation about giving up their own customized legacy systems. Moreover, according to statements made during site visits, Marine Corps has a preferred business culture that favors decentralization, autonomy, and flexibility when it comes to recordkeeping in the field. It was also indicated to the NARA inspection team that senior leaders within the DON view the centralization of electronic records, particularly senior leaders' email, as a security risk, and there has been some high-level concern about whether DON TRACKER might become a so-called "target of opportunity."

The DON is well aware of the issue of organizational adoption when it comes to an enterprise-wide ERMS. Indeed, as has been discussed, DON TRACKER has been proposed in large part to solve this very problem. The goal of DON TRACKER is to make electronic records management less onerous by making it more seamless, enabling it to take place in the same system staff use to delegate and monitor work. The vision is sound, but it will take many years and a great deal of senior level support to consolidate all existing systems and to encourage - and to some degree enforce - user buy-in.

One unique characteristic of the DON TRACKER system that may help in user adoption is that anyone with a .mil email address in the Department can be tasked within the system. DON TRACKER does not require an individual's name and information be entered prior to their being assigned work in the system. The effect will be that use of DON TRACKER will spread organically as staff receive email messages that they have been assigned to work on a tasker in the system. If such a message arrives in their inbox and they have yet to sign into DON TRACKER, they then must go through the initial procedures of signing into the system to complete action on an assigned project. In this way use of the system can spread somewhat automatically, and is not solely dependent on commands within the DON "switching on" DON TRACKER and enrolling staff in the system. While the advantages that DON TRACKER has over TRIM in the area of organizational adoption are apparent, only time will tell if DON TRACKER will prevail as a single, enterprise-wide solution for managing Navy's electronic records. NARA looks forward to monitoring the DON's progress in rolling out this system in the years to come.

EMAIL MANAGEMENT

CURRENT STATE OF EMAIL MANAGEMENT

For most members of the DON, email management is a manual process. The average Navy staff member has 250 megabytes of local email storage. If that space has been exhausted, emails can also be saved as Personal Storage Tables (PSTs) on hard drives or on shared drives. There are

multiple email platforms used throughout the organization. Email is placed into TRIM in one of two ways: 1) users must drag-and-drop selected email messages into the system, or 2) an administrator with proxy rights can bulk export email messages from a live email account. The second option is used for managing the email of select senior leaders. We understand that the email of senior Navy staff is generally managed by Yeomen or other administrative staff who have proxy rights to accounts.

The DON has been keeping the email accounts of U.S. Navy senior leaders since 2005. Originally, the DON began saving the accounts of the Secretary of the Navy and the Chief of Naval Operations as the most senior officials in the Secretariat and the U.S. Navy. Over time, the DON began to save the accounts of other senior leaders as well. All of these senior-leader email accounts, constituting over 4.7 terabytes of data, will be ingested into TRIM. Currently, about four terabytes still reside on an eVault server.

Prior to 2005, the DON was printing and filing email in accordance with its policy at that time. If an email was determined to be a record, it was printed and filed in a subject or case file. (For example, email records were added to the Secretariat's case files in this way.) Until recently, print and file was the standard method used by Federal agencies for the management and preservation of record email. This paper-based method has many limitations, including overly cumbersome and time-intensive steps for creating, managing, and accessing record copies of email. This is one of the reasons for the transition to maintaining email in an electronic format as prescribed by the OMB/NARA *Managing Government Records Directive* (M-12-18).

Finding 1: While the DON has transitioned to managing email electronically, the Navy Records Manual (SECNAV M-5210.1) contains print and file instructions for managing record copies of email.

The DON has preserved email accounts of senior leaders since 2005 and has procedures in place to capture the email of senior leaders into TRIM. Also, the DON is working to implement the Capstone approach to manage senior leader email. However, the Navy Records Manual (SECNAV M-5210.1) still contains the following print and file instruction: "E-mail records that meet the definition of a record ... may be converted to a paper copy, then scheduled for disposition within approved paper-based records management procedures for e-mail records." Subsequent to this inspection, the DON has finalized and disseminated SECNAV instruction 5210.8E, which covers managing email in electronic format. The DON has plans to update the Navy Records Manual to reflect its new email management policy.

Recommendation 1: The DON must update the sections of the Navy Records Manual covering email management.

The Marine Corps has been retaining email accounts electronically since 2007. This email, approximately 900,000 accounts, is in the physical custody of the Marine Corps Network Operations and Security Command (MCNOSC). Marine Corps records managers have segregated out the email of the organization's senior leaders. DON TRACKER is the intended repository for this segregated email once the records management functionality in the system is in place. Until such time, the potentially permanent email of senior leaders is stored on Digital Versatile Discs (DVDs) and is in the custody of the records management program. Prior to 2007

the Marine Corps' policy was, like the Navy's, to print and file record emails and include them as part of a paper subject or case file.

FUTURE STATE OF EMAIL MANAGEMENT

The DON will implement what is known as the "Capstone" approach for managing email – a method through which the accounts of select senior leaders are retained for eventual transfer to the National Archives. The explicitly hierarchical nature of the DON makes the Capstone approach a potentially valuable part of the organization's email management strategy. Based on the inspection team's observations, it seems likely that email documenting the activities and decision making of the DON will be found at the highest levels of the organization.

The DON's RM staffs have already spent considerable time identifying Capstone officials. The DON's proposed draft schedule covers select senior leaders in the top echelon (Echelon I) of the Navy and 145 senior leaders from throughout the Marine Corps. When DON TRACKER comes on line, designated officials will have their email journaled directly into the system. This automated process will remove human intervention from the email management process and help to ensure compliance with DON email policies.

DON TRACKER is being designed with Capstone in mind. DON has captured and incorporated sufficient application functionality into DON TRACKER to accomplish the RM email requirements of its Capstone approach. The application provides four alternative approaches for users to provide email records depending upon the user's role, the application they are working in, or the location of the email message. Additionally, DON TRACKER provides two options within an email application to ingest email into the system – one approach for when email systems are integrated and another that requires manually forwarding the email to a temporary holding account for future loading into DON TRACKER. DON TRACKER requirements have also incorporated sufficient email metadata. Navy should ensure that the system, when implemented, complies with NARA's metadata guidance for the transfer of permanent electronic records (NARA Bulletin 2015-04).

GENERAL SUMMARY AND KEY POINTS

Navy acknowledges that the shortcomings of the TRIM implementation have contributed to "unfavorable compliance" with RM policy and guidance within parts of the Navy. This general acknowledgement by Navy is an important one, and the DON TRACKER proposal is meant to be a large-scale, enterprise-wide solution to the problem Navy has identified. The DON believes that the DON TRACKER implementation will eventually reach those areas within the organization where electronic records are not being handled as effectively and compliantly as DON would like.

Compliance with electronic records management regulations, guidance, and policy at the U.S. Navy will also be improved by a recent agreement reached between the Navy Records Officer and the Navy Inspector General (IG) to include the records officer in routine IG inspections. The Navy Records Officer views this as an important accomplishment, and the NARA inspection

team is hopeful that the arrangement will be fruitful. Several site visits both nationally and internationally have already been scheduled.

The Marine Corps Records Officer is working currently with the Marine Corps IG (IGMC) on its routine inspections and has been doing so since 2004. The IGMC notifies the Records Officer of an inspection via the Marine Corps tasking system and formally requests records management participation. Given staffing limitations, the Records Officer participates in approximately 75 percent of these requests. (Subsequent to the inspection, the Records Officer began supporting 100% of the requests.) The Records Officer and her staff write reports, identify findings/discrepancies, and report back to the IGMC who in turn handles the communications with those who have been inspected. The records management office tracks findings/discrepancies on a spreadsheet and conducts trend analyses every quarter. It communicates with those entities that have been inspected to determine a “get well” plan and then keeps in contact with them to ensure they are staying on track.

Given Navy’s general statements about areas of “unfavorable compliance” with RM policy and guidance, NARA intends to follow the progress of the work that the Navy Records Officer is planning to do with the Navy IG as well as the ongoing work the Marine Corps Records Officer has been doing with the IGMC. NARA requests that DON records management and Marine Corps records management periodically share with NARA the findings and recommendations that come out of their respective collaborations with their IGs as they relate to the handling of electronic records, including email. NARA also plans to review documentation of how various Navy and Marine Corps entities are closing out recommendations of this kind.

KEY POINTS

This report makes only one recommendation: that the DON update the Navy’s Records Manual (SECNAV M-5210.1) with instructions that align with its new policy for managing email electronically. Within the defined scope of this effort, the inspection team identified no significant areas of risk that the DON is not already aware of and that the DON is not planning to address with the planned implementation of DON TRACKER. There are, however, areas of concern that NARA will be monitoring:

- The current state of electronic records management in the DON is diffuse and disconnected with too many silos of information. DON TRACKER is the DON’s solution to improve significantly enterprise-wide electronic records management;
- DON TRACKER must avoid the TRIM implementation shortcomings, noted in this report and already acknowledged by the DON, for it to be successful;
- There are significant hurdles and challenges, noted in this report, to the enterprise-wide implementation and adoption of DON TRACKER. Other challenges may surface as the new system moves further along in its development;
- DON RM staff and the contractors who are developing DON TRACKER should continue their close collaboration;
- User adoption will be a challenge given the size of the DON, its global footprint, and the number of systems DON TRACKER will be replacing;

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- The U.S. Navy and Marine Corps have identified challenges to RM policy and guidance compliance and have partnered with their respective Inspectors General to address these challenges;
 - The migration of records into DON TRACKER will take meticulous planning and careful execution. The Navy and Marine Corps started this work with the DON TRACKER contractors;
 - Implementing the Capstone approach to email management will be very complex for an organization the size of the DON. The way DON TRACKER handles email capture and preservation will be critical. The current design options are interesting and, if successful, may be of wider use to other Federal agencies.

CONCLUSION

Overall the DON's conversion from TRIM to DON TRACKER is of great interest to NARA. Its implementation, if successful, could serve as a model for other Federal records management programs. When it comes to the long-term success of the new system, the biggest outstanding question is user adoption. Once DON TRACKER is implemented, the working relationship that has been established between records management and the IG at the DON could help mitigate the risk that DON TRACKER replicates some of the same insufficiencies as those of DON's enterprise-wide adoption of TRIM.

As the DON has acknowledged the shortcomings of TRIM, and is making progress towards remediating them, and as DON TRACKER implementation is proceeding in phases, this report makes only one recommendation: that the DON update the Navy's Records Manual (SECNAV M-5210.1) with instructions that align with its new policy for managing email electronically. However, NARA will monitor the results of the compliance work that DON records managers are carrying out in conjunction with the Marine Corps and U.S. Navy Inspectors General and will monitor progress towards implementation of DON TRACKER. NARA will follow up on this inspection in the future to gauge how successful the new system is in improving electronic records management at the DON. In a related but separate project, NARA is also working with Department of Defense Records Management in planning comprehensive inspections for DoD services and components beginning in FY 2017. The DON will be included in this project.

APPENDIX A

SELECT PRE-INSPECTION DOCUMENTS

DON TRACKER

DON TRACKER Business Case Analysis, DON, March 2013

DON TRACKER Integrated Master Plan, DON, June 2013

DON TRACKER Change Management Plan, US Navy Sea Warrior Program Management Office, May 2015

DON TRACKER Functional Requirement Document, DON, March 2013

DON TRACKER Operational Concept, US Navy Sea Warrior Program Management, 2013

DON TRACKER System Engineering Plan, DON, October 2013

TRIM

DON TRIM Context Dataset Records Manager Guide (DRM Guide), Director of Records DON, 2007

TRIM Context End-User Training, Director of Records DON, undated

TRIM Context Administrator Training, Director of Records DON, undated

TRIM Context Road Show, Director of Records DON, 2006

General Electronic Records at the DON

SECNAV Instruction 5210.8E (2015)

SECNAV Instruction 5210.8D (2005)

DON CIO Memorandum, DON Electronic RM and Record 34 Electronic Mail (Email) Management, June 2007

DON CIO 35 Memorandum, Information System Records Scheduling, June 2009

DON CIO Memorandum, DON Policy for Electronic 37 Recordkeeping in Systems and Applications, March 2013

DON CIO Memorandum, Management of Electronic Mail (Email) on Non-Official Email Accounts (draft)

DON Capstone (Draft Schedule)

NAVMC DIR 5210.11E, Marine Corps Records Management Program, May 2006

SECNAV Manual 5210.1, Department of the Navy Records Management Manual, January 2012
with Revision 1

OPNAVINST 5210.20, Navy Records Management Program, Dec 2010

APPENDIX B AUTHORITIES AND FOLLOW-UP ACTIONS

AUTHORITIES

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

FOLLOW-UP ACTIONS

- NARA will monitor the work of Navy and Marine Corps records managers conducted with their Inspectors General
 - NARA will follow the progress of the implementation of DON TRACKER
 - NARA will investigate in the future how successful the new system is in improving electronic records management
-

APPENDIX C
ENTITIES MET WITH DURING INSPECTION

CIO Office of Policy and Guidance – DON

Directives and Records Management Division - DON

DON TRACKER Project Management Team - Marine Corps

Gray Research Center – Marine Corps

MCTILM Contractors – Marine Corps

Naval Audit Service – Norfolk

NAVSUP – Navy Household Goods

Navy TRIM Administrator

Office of Records, Reports, Directives and Forms – Marine Corps

Progeny – DON TRACKER Contractors

Sea Warrior Program – DON TRACKER Development Team

Space and Naval Warfare Systems Command – DON TRACKER Development Team

Submarine Force Atlantic - Norfolk

APPENDIX D

SELECTED INSPECTION QUESTIONS

What did Navy learn about user buy-in in implementing TRIM that it is utilizing in the implementation of DON TRACKER?

What is Navy doing with the legacy data in TRIM? Is Navy migrating it to DON TRACKER or running both systems until retention periods are up for records stored in TRIM?

What records and information will go into DON TRACKER?

How is DON TRACKER going to capture records? In what formats will records be captured?

How will records retention be applied in DON TRACKER? Will the system apply retentions or will users?

What is the overall strategy for implementation of DON TRACKER?

What policies have been created - or will be created - to govern the application and to ensure its use?

What training has been developed for users?

Are records management controls incorporated into electronic information systems – or into a recordkeeping system external to a system - to ensure the reliability, authenticity, integrity, and usability of agency electronic records?

Is records management functionality - including the capture, retrieval, and retention of records according to records schedules - incorporated into the design, development, and implementation of electronic information systems?

Are records migration strategies for electronic records designed and implemented in order to maintain and use records as long as needed for business purposes and according to NARA-approved retention schedules?

Do controls exist for the management of electronic records to ensure the integration of the management of electronic records with other records and information resource management programs?

Are audit trails incorporated into electronic systems?

Does Navy identify and transfer eligible permanent electronic records to the National Archives?

Are instructions for the management of electronic records and email records issued to agency staff?

Is Navy following instructions for the management of electronic records and email records?

Is Navy managing permanent and temporary email electronically or does it have plans to manage email electronically?

Does the records management program coordinate records management activities with other information management and agency activities?

Does Navy's records management program staff participate in the design, development, and implementation of new electronic information systems and migration strategies?

Does records management staff have the necessary core competencies in electronic records to carry out their duties and responsibilities?

Does Navy's records management program maintain an up-to-date inventory of all electronic information systems and their scheduling status?

Does the records management program provide agency-specific training on the retention and management of records created and maintained in electronic format, including email records, for all employees?

APPENDIX E

ACRONYMS

BRAC	Base Realignment and Closure
BUPERS	Bureau of Naval Personnel
CDMS	Corporate Document Management System
CFR	Code of Federal Regulations
CIMS	Congressional Information Management System
CIO	Chief Information Officer
CMC	Commandant of the Marine Corps
CNO	Chief of Naval Operations
CONUS	Contiguous United States
DMCS	Director of Marine Corps Staff
DNS	Director of Navy Staff
DoD	Department of Defense
DON	Department of the Navy
DON TRACKER	Department of the Navy Tasking, Records and Consolidated Knowledge Enterprise Repository
DRM	Dataset Records Manager
DRMD	Directives and Records Management Division
DVD	Digital Versatile Disc
EDRMS	Electronic Document and Records Management System
ERMS	Electronic Records Management System
FLCN	Fleet Logistics Center Norfolk
GRC	Gray Research Center

IG	Inspector General
IGMC	Marine Corps Inspector General
IP	Internet Protocol
IT	Information Technology
MCATS	Marine Corps Action Tracking System
MCNOSC	Marine Corps Network Operations and Security Command
MCTILM	Marine Corps Tool for Information Lifecycle Management
NARA	National Archives and Records Administration
NAVSEA	Naval Sea Systems Command
NAVSUP	Naval Supply System Command
NHHC	Navy History and Heritage Command
NIPRNET	Non-Secure Internet Protocol Router NETWORK
NKO	Navy Knowledge Online
NMCI	Navy Marine Corps Intranet
OCONUS	Outside the Contiguous United States
OMB	Office of Management and Budget
OPNAV	Office of the Chief of Naval Operations
PMW 240	Sea Warrior Program
PST	Personal Storage Table
RM	Records Management
RMSA	Records Management Self-Assessment
SAO	Senior Agency Official for Records Management
SECNAV	Secretary of the Navy

SIPRNET	Secret Internet Protocol Router Network
SPAWAR	Space and Naval Warfare Systems Command
SSIC	Standard Subject Identification Codes
TRIM	Total Records and Information Management
TV-5	Tasker Version 5
U.S.C.	United States Code
USTRANSCOM	United States Transportation Command



NATIONAL
ARCHIVES

OFFICE *of the*
CHIEF RECORDS
OFFICER