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Department of State  
Records Management Program

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*Records Management Inspection Report*

National Archives and Records Administration  
May 12, 2020

**DEPARTMENT OF STATE  
RECORDS MANAGEMENT PROGRAM  
INSPECTION REPORT**

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. In this capacity, and based on authority granted by [44 United States Code \(U.S.C.\) 2904\(c\)\(7\) and 2906](#), NARA conducted an inspection of the Department of State (State) departmental records management (RM) program in July and August 2019.

The purpose of this inspection was to examine how well the State RM program and the program offices and bureaus communicate and cooperate in order to develop and implement effective records management throughout the Department in compliance with Federal records management statutes and regulations.

This inspection focused on RM standards, policies, procedures, and practices at the Department level and their impact on office/bureau programs. It also examined the controls the Department has implemented to mitigate risks associated with non-compliant handling of records and information and to ensure that departmental policies and procedures are implemented and followed accordingly. The bureau programs were not the focus of this inspection and are included here only to the extent that they intersect with, and to some degree, rely upon the departmental program to be effective. As a result of this inspection, the NARA team identified a limited number of areas of non-compliance with [36 Code of Federal Regulations \(CFR\) Chapter XII, Subchapter B](#), which increases the risk that records will not be readily accessible for normal business operations, for program development, and for accountability to Congress and the public. To help mitigate the risks associated with non-compliance, this report makes 7 findings and 8 recommendations. Follow-up actions required for State and NARA are included in Appendix C.

**OVERVIEW OF THE STATE RECORDS MANAGEMENT PROGRAM**

The Records and Archives Management Division is located within the Under Secretary for Management, Administration Division - Office of Information Programs and Services (IPS). The Records and Archives Management Division provides Department-wide RM policy, the required RM training for all employees, additional role-based training, and guidance to the Department's offices, bureaus, and posts, and directly oversees the RM program for the Department of State. According to 1 Foreign Affairs Manual (FAM) 020.2-22, the Executive Secretariat/Executive Secretary (S/ES) Records and Information Management (RIM) Division "implements and administers the records policies, standards, systems, and procedures for the Secretary, the Deputy Secretaries, Under Secretaries, Counselor, Special Envoys and Representatives, and other offices supported by the Executive Secretariat." Working closely with IPS, the S/ES has a team of eight full-time employees that directly oversees the RM program for 30 offices and bureaus, and is primarily concerned with the management of records of senior leaders.

The Records and Archives Management Division uses the Records Management Self-Assessment (RMSA) in order to address gaps in their program by examining the low scoring

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areas of the RMSA. A risk analysis is completed and strategic goals are created to meet RM milestones. There is a high-level strategic plan that outlines quarterly goals that need to be met department-wide.

The Department of State's Records and Archives Management Division has established strong and effective communication channels whereby policies, directives, and records management practices and initiatives are developed, shared, and organized to implement a successful records management program. The ARO and Records and Archives Management Division team are extensively involved with the interviewed bureaus/offices and are involved with all aspects of the records lifecycle.

The Department of State employs a variety of controls that affect the management of records and information and the creation of electronic information systems. For example, State controls how information is managed and has limited the amount of ad hoc systems developed by individual offices. In addition, the Department uses the Records Management Self-Assessment (RMSA) in order to address gaps in their program by examining the low scoring areas of the RMSA. A risk analysis is completed and strategic goals are created to meet RM milestones. There is a high-level strategic plan that outlines quarterly goals that need to be met department-wide.

## **FINDINGS AND RECOMMENDATIONS**

### **RECORDS MANAGEMENT TRAINING**

All State employees are required to take annual records management (RM) training. This training is actively enforced. If an employee does not take the training within 10 days of joining State or does not complete annual refresher training, they will be locked out of their IT account. The training meets all NARA requirements as outlined in NARA Bulletin 2017-01, Agency Records Management Training Requirements. In addition, State offers additional specialized training and SOPs designed specifically for staff members who have RM responsibilities. The "Government Records: Briefing Booklet for All Employees" Section 4 gives a brief overview of the roles and responsibilities for different types of employees including roles and responsibilities for senior officials and executive directors.

Some of the program offices/bureaus offer additional training to their staff members. Of particular note, S/ES-S Records unit staff members conduct additional on-site, in-person training for the employees in the individual offices that are overseen by S/ES RM Division. S/ES RM Division uses personnel trackers to ensure that all employees and contractors attend this additional training.

#### **Finding 1: All offices/bureaus must establish onboarding and exiting for all employees of the office/bureau.**

Records management is built into the onboarding and exiting process for most of the Department. The Department's most senior officials receive onboarding and exiting briefings from the Agency Records Officer. However, there are a few offices that do not include records management in the on-boarding and/or exiting process.

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*Recommendation 1: The Department of State must standardize the onboarding and exiting process to ensure that all new and departing employees in the Department receive an onboarding and exit briefing. (36 CFR, Part 1220.34)*

### **COMMUNICATION AND COLLABORATION**

There is a formal network of records coordinators. As authorized by the 5 FAM 414.3-1 and 5 FAM 414.4, the ARO works with the Executive Office Directors, Management Officers (Ambassador Offices), Bureau Records Coordinators (domestic offices), Post Records Coordinators (overseas posts), Information Management Officers, and other stakeholders.

State uses a formal messaging tool to disseminate policies department-wide, otherwise known as “cabling.” All policies are then posted on the Department intranet. The ARO uses a listserv to communicate with the Bureau and Post Records Coordinators and meets quarterly with the Bureau Records Coordinators. In addition, the ARO participates in the Electronic Records Management Working Group that meets monthly to address electronic RM for the entire Department.

Of particular note, S/ES RM Division staff manage a portfolio of senior official offices that are staffed by part or full-time records coordinators. S/ES RM Division staff meet regularly with the records coordinators in order to ensure that all S/ES offices are in compliance with RM policies and procedures.

### **Finding 2: There is a critical lack of Information Management Officers and Office Management Specialists at posts causing ineffective information management practices.**

According to the Department of State Policy (5 FAM 120: Information Management-Staffing Abroad), while the Information Management Officers (IMO) are responsible for IRM operations at post, the Office Management Specialist (OMS) is the individual who ultimately has the responsibility to implement records management at post. During interviews with the bureaus in the Under Secretary for Political Affairs (commonly known as the “P Family”), it was communicated that there is currently a “critical lack of IMO and OMS.” As both the IMO and OMS have direct responsibility for records and information management at posts, the lack of personnel assigned to these roles inhibits the ability of the Department of State to create and maintain federal records in accordance with State policy and federal statutes and regulations.

*Recommendation 2: State must take steps to ensure that records management responsibilities are assigned appropriately, and in accordance with State policy, to ensure effective controls over the creation, use, and maintenance of federal records. (44 U.S.C., 302 and 36 CFR 1220.34(d))*

### **SCHEDULING AND DISPOSITION**

State uses a records inventory management system to manage its records. This database documents State’s records schedules and the records associated with the schedules. This database tracks offices in sending records to the Records and Archives Management Division, including gaps in these transfers. A report is run annually to identify records ready for transfer to the

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records centers or records that have reached the end of their retention period and are eligible for destruction or transfer into the holdings of NARA.

State is comprehensively updating its records schedules. To date, several schedules have been approved, including one for the Office of the Secretary of State, Principal Officers, and other Senior Agency Officials. For this project, the Records and Archives Management Division works directly with State bureaus and offices to schedule any new or unscheduled records. When new or unscheduled record series are identified, the RM program reaches out to the office/bureau that creates and/or maintains the records and, working with that office, the RM program begins to draft a schedule for any new and/or unscheduled records. While State undertakes its comprehensive scheduling project, the RM program will identify unscheduled records series through the process of inventorying or transferring records. As unscheduled records are identified, it is essential that State take steps to have these records covered by an approved disposition authority. This is particularly important when State attempts to transfer unscheduled records to the National Archives.

**Finding 3: State has not transferred all eligible permanent records series to NARA at the end of their retention period.**

As of November 12, 2019, NARA's Electronic Records Archives (ERA) shows that there are currently approximately 1,150 outstanding transfers of State records housed in NARA's Federal Records Centers, which are overdue to be transferred into the holdings of the National Archives. In addition, State has an unknown quantity of permanent records that may also be overdue and eligible for transfer in State's legal and physical custody. These need to be accounted for as well. State has continuously faced challenges in transferring records to NARA and has only been able to rectify these challenges with limited success.

*Recommendation 3: State must work with NARA to identify and develop an interagency strategy to facilitate the transfer to NARA of overdue permanent records as they become eligible. (44 U.S.C, 3302; 36 CFR, Part 1226.32; and NARA Bulletin 2018-01)*

**Finding 4: Internal controls regarding the digitization of records are not consistently followed.**

During the interviews, the staff members from one particular office stated that the office was destroying records after they were digitized, which is not in accordance with State digitization internal controls and guidelines.

*Recommendation 4.1: State must ensure that established internal controls regarding the digitization of temporary records are followed in accordance with applicable laws, regulations, and NARA guidance. (36 CFR, Part 1236, Subpart D)*

*Recommendation 4.2: Disposition of source records must be executed in accordance with State policy and as outlined in 36 CFR, Part 1236.36. (36 CFR, Part 1236.36)*

**RECORDS MANAGEMENT INTEGRATED INTO INFORMATION TECHNOLOGY PROCESSES**

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The Department of State has developed and implemented policies and procedures in order to appropriately manage information technology processes. For example, State prescribes appropriate electronic messaging platforms and methodologies to be used in encrypting and exporting messages created or received in the course of conducting business. In particular, the Department's memorandum explicitly states which messaging apps may be used by Department of State personnel. The policies and procedures are communicated via the Department of State Intranet, communication cables to all Department posts, and emailed directly to personnel in department-wide communications.

The Department of State utilizes their "Social Media Hub" to give direction to employees on the use of social media platforms. One directive featured on the Social Media Hub, "Archiving Social Media Account," provides step-by-step instructions for archiving records created or received using social media platforms. These instructions supplement departmental policies regarding the preservation and archiving of electronic records.

Network drives are tracked and logged. There is version control and files cannot be permanently deleted by the employees. Several offices/bureaus are using standardized naming conventions in order to ensure that all files are saved appropriately and able to be located when needed. For example, the Office of the Under Secretary for Arms Control & International Security and the Office of the Under Secretary for Public Diplomacy & Public Affairs provided NARA with their Standard Operating Procedures for Records Management, which included direction to staff members on file organization and naming conventions for their shared drives.

The Department should continue to develop and update its policies and mandatory training in order to ensure that all employees and contractors understand their records management responsibilities so that State will be able to adequately and properly document agency activities.

The inspection team also found several aspects of State's information technology program related to records management for which improvement needs to be addressed in the near term. In addition, the team identified several areas needing improvement in the area of information technology processes.

**Finding 5: The ARO does not have a formal role in developing or approving information systems; however, the ARO is notified when systems are being commissioned or decommissioned.**

OMB Circular A-130, "Managing Information as a Strategic Resource," states that records management functions and retention and dispositions requirements must be fully incorporated into information life cycle processes and stages, including the design, development, implementing, and decommissioning of information systems. This includes IT resources such as storage solutions and cloud-based services such as software as a service, platform as a service, and infrastructure as a service.

In addition, OMB A-130 also states that agencies must consider records management implications for all resource planning and management activities throughout the system development life cycle so that risks are appropriately managed. Agencies must ensure that

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system development includes ensuring that records management is considered in authorizing the development of new systems and the updates of existing systems.

Along with OMB A-130's requirements, the 36 CFR Part 1236.12 states that agencies must ensure that records management requirements are fulfilled as part of an agency's capital planning and system development lifecycle process.

*Recommendation 5: The ARO must be formally designated as an approving authority in the Authority to Operate (ATO) and IT review processes for the development, implementation, updating, and decommissioning of information systems in order to ensure compliance with RM laws and regulations, in particular, the requirement for electronic systems as outlined in 36 CFR, Part 1236, Subpart B. (36 CFR, Part 1236, Subpart B)*

**Finding 6: State does not have a formal periodic process in place to validate whether specific information systems are in compliance with 36 CFR 1236, Subpart B.**

OMB A-130 requires agencies to manage electronic records in accordance with Government-wide requirements. 44 USC 3506 (f) requires a formal periodic validation process in order to ensure that electronic systems are in compliance with any laws and regulations. This validation process ensures that agencies are implementing and enforcing applicable policies and procedures, including requirements for archiving information maintained in electronic format, particularly in the planning, design and operation of information systems.

*Recommendation 6: State must develop a formal periodic validation process of electronic systems in order to ensure that these systems are in compliance with 36 CFR, Part 1236, Subpart B. (44 USC 3506 (f) and 36 CFR, Part 1236, Subpart B).*

**Finding 7: Shared drive practices are inconsistent and lack standard operating procedures and/or policies.**

The use of shared drives is prolific throughout the Department. While most offices interviewed have established policies or procedures, some offices do not have a standardized set of naming conventions for these files to facilitate locating records.

*Recommendation 7: State should ensure that all program offices/bureaus establish consistent policies and procedures for managing their shared drives. This includes, but is not limited to, establishing a standardized set of naming conventions for folders and files. (NARA Bulletin 2012-02)*

**DIRECTIVE AND POLICY**

State's overarching Records Management Policy is the 5 Foreign Affairs Manual (FAM) 400-490, Records Management. The policy is updated in sections as needed, with the most recent update of July 10, 2019. 5 FAM 400-490 is supplemented by other sections of 5 FAM that cover other aspects of Information Management including, but not limited to, Cloud Computing, Information Technology Management and Information Technology Systems.

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State supplements 5 FAM with Department-wide cables and Department Notices that deliver policy and guidance on aspects of records and information management. Of particular note, State issued guidance on text messaging applications that included a list of applications that State employees could use for messaging and which messaging platforms are not approved by the Department for official use. Employees are also provided instructions on how to ensure that any messages that are considered federal records are saved and transferred into the custody of the Department.

All Department of State policies and directives are sent out via cables (Department of State's formal messaging platform). This cable is followed by a Department notice, a Department-wide email, and also posted on the RM Intranet site. All State employees and contractors with an IT account have access to the Intranet site.

### **EMAIL MANAGEMENT**

The Department of State has adopted a Capstone approach to email management. All email is managed electronically and the system ensures that attachments to the emails are preserved as part of the email record or linked to the email record with other related records. Human Resources develops a weekly report of Capstone usage including new and departing staff members. Official email policy includes the requirement that if a non-federal email account is used for federal business, the employee is required to forward those emails to their federal account within 20 days. The FAM discourages the use of personal email accounts and states that convenience is not an appropriate reason for using a personal email account to conduct federal business.

### **RECORDS MANAGEMENT PROGRAM OVERSIGHT**

The Records and Archives Management Division uses OIG reports and the NARA Success Criteria<sup>1</sup> to review the effectiveness of the RM program. The Department conducts these evaluations as reports become available within the Department. In addition, S/ES RM Division staff members conduct onsite evaluations and trainings for the offices within their individual portfolios. Records and Archives Management and S/ES RM Division staff members demonstrated proactive initiatives to ensure compliance with RM laws and regulations and Department of State RM policy.

## **CONCLUSION**

Overall, State has established a robust RM program with strong communication channels, a comprehensive and thoroughly disseminated policy directive, and comprehensive RM training that includes a compliance component. State has also made significant progress to successfully integrate RM and information technology.

While many aspects of the State RM program are well established and contain many strengths,

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<sup>1</sup> State uses the Success Criteria issued by NARA in order to review their effectiveness of the RM program. These Success Criteria include the "Criteria for Successfully Managing Permanent Electronic Records" and "Criteria for Managing Email Records in Compliance with the Managing Government Records Directive (M-12-18)."

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making the improvements recommended in this report will mitigate and minimize risks to departmental records, further strengthen the Department's records management program and the RM programs of the bureaus, contribute to the Department's overall mission, and enhance the effective management and preservation of the Department's records.

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## **APPENDIX A INSPECTION PROCESS**

### **OBJECTIVE AND SCOPE**

The objective of this inspection was to determine if State implements standards, policies, procedures, and other records management coordination practices to ensure that the Department and its bureaus and offices have effective records management programs.

### **METHODOLOGY**

NARA carried out this inspection by conducting interviews at State Headquarters with selected bureaus and program offices and by reviewing State program documentation. More specifically, the inspection team:

- reviewed records management policies, directives, and other documentation provided by State and its administrations;
- interviewed State staff members from selected bureaus/offices;
- guided the course of the inspection using a detailed checklist of questions based on Federal statutes, Federal regulations, and NARA guidance; and
- reviewed State and administration responses to current and past annual Records Management Self-Assessments (RMSA) and current and past reports of Senior Agency Official for Records Management (SAORM).

### **BUREAUS INTERVIEWED**

NARA visited the following State offices in the Washington, DC.

- Records and Archives Management Division
- Executive Secretariat/Executive Secretary
- Under Secretary for Political Affairs
  - International Organizations
  - African Affairs
  - European and Eurasian Affairs
  - East Asian and Pacific Affairs
  - Near Eastern Affairs
  - South and Central Asian Affairs
  - Western Hemisphere Affairs
- Bureau of Oceans and International Environmental and Scientific Affairs
- Under Secretary for Arms Control and International Security Affairs
- Under Secretary for Public Diplomacy and Public Affairs
- Bureau of Information Resource Management
- Bureau of International Narcotics and Law Enforcement
- Bureau of Intelligence and Research

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- Office of the Legal Adviser
  - Office of the Chief of Protocol

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**APPENDIX B**  
**RELEVANT INSPECTION DOCUMENTATION**

U.S. Department of State, “Archiving Social Media Accounts,” December 6, 2016.

U.S. Department of State, “Completing the DS-0693, Records Retirement Transmittal Form.”

U.S. Department of State, “Foreign Affairs Manual (FAM) and Handbook: 5 FAM Information Management.”

U.S. Department of State, “Instructions for Retiring Records via Direct Network Transfer.”

U.S. Department of State, “Records Management for Everyone Training.”

U.S. Department of State, “Records Storage Reduction Project: Consolidated Action Plan.”

U.S. Department of State, “Removal of Personal Papers and Non-Record Material.”

U.S. Department of State, “Text Message Export Procedures.”

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## APPENDIX C AUTHORITIES AND FOLLOW-UP ACTIONS

### AUTHORITIES

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

### OTHER GUIDANCE

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

### 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](#).

At a high-level, with respect to records and information management, 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)).

### FOLLOW-UP ACTIONS

State will submit to NARA a Plan of Corrective Action (PoCA) that specifies how State 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 Secretary of State.

NARA will analyze the adequacy of State's action plan, provide comments to State on the plan within 60 calendar days of receipt, and assist State in implementing recommendations. State will submit to NARA progress reports on the implementation of the action plan until all actions are completed. The frequency of progress reports will be determined during the development of the PoCA. NARA will inform State when progress reports are no longer needed.

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## APPENDIX D

### ACRONYMS AND ABBREVIATIONS

AF	African Affairs
ARO	Agency Records Officer
CFR	Code of Federal Regulations
CIO	Chief Information Officer
EAP	East Asian and Pacific Affairs
EUR	European and Eurasian Affairs
FAM	Foreign Affairs Manual
GRS	General Records Schedule
INL	International Narcotics and Law Enforcement
INR	Intelligence and Research
IO	International Organizations
IPS	Office of Information Programs and Services
IRM	Information Resource Management
L	Office of the Legal Adviser
NARA	National Archives and Records Administration
NEA	Near Eastern Affairs
OCIO	Office of the Chief Information Officer
OES	Oceans and International Environmental and Scientific Affairs
OMB	Office of Management and Budget
P	Under Secretary for Political Affairs
PoCA	Plan of Corrective Action
R	Under Secretary for Public Diplomacy and Public Affairs
RCS	Records Control Schedule
RIM	Records and Information Management
RIMCert	Records and Information Management Certification
RM	Records Management
RMSA	Records Management Self-Assessment
SAORM	Senior Agency Official for Records Management
SCA	South and Central Asian Affairs
S/ES	Executive Secretariat - Executive Secretary
S/CPR	Office of the Chief of Protocol
State	Department of State
T	Under Secretary for Arms Control and International Security Affairs
U.S.C.	United States Code
WHA	Western Hemisphere Affairs



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