



**A REPORT TO THE
INTERAGENCY COMMITTEE ON
GOVERNMENT INFORMATION**

**RECOMMENDATIONS FOR THE
EFFECTIVE MANAGEMENT OF
GOVERNMENT INFORMATION ON THE
INTERNET
AND OTHER ELECTRONIC RECORDS**

BY THE

ELECTRONIC RECORDS POLICY WORKING GROUP

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EXECUTIVE SUMMARY

Section 207 of the E-Government Act of 2002 (Pub.L.107-347)¹ mandates that the Interagency Committee on Government Information (ICGI) recommend policies to ensure effective management of Government information on the Internet and other electronic records to the Director of the Office of Management and Budget (OMB) and the Archivist of the United States, by December 17, 2004.

The Electronic Records Policy Working Group (ERPWG) believes that this mandate represents a significant opportunity for the Federal Government to improve the management of Government information on the Internet and other electronic records. As such, the ERPWG has designed four high-level recommendations as a broadly scoped, long-term, integrated, cohesive response to the complex contemporary business environment described in the previously issued “Barriers to Effective Management of Government Information on the Internet and Other Electronic Records”². No single recommendation can stand alone as an effective, long-term strategy. All four recommendations need to be understood as mutually supportive strategies dealing with accountability, Government-wide policy and technical support, high-level advocacy and coordination, and the infusion of information and records management requirements into agency business processes and decision-making.

The recommendations in this report propose policies and procedures that are intended to:

1. Improve accountability for records management.

Recommendation 1 addresses the low priority assigned to information and records management. Agencies must have an expectation that their actions have important positive or negative consequences, and there needs to be an effective mechanism for evaluating agency actions. Recommendation 1 proposes that NARA and OMB work together with the Inspector General community through the President’s Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE) to identify appropriate mechanisms for evaluating compliance with existing legislation and establish incentives for agencies to take action to properly manage and protect their records as valuable Government assets.

¹ E-Government Act of 2002, Public Law 107-347, 107th Cong., 2d sess. (December 17, 2002), http://frwebgate.access.gpo.gov/cgi-bin/useftp.cgi?IPaddress=162.140.64.21&filename=publ347.107&directory=/disk/wais/data/107_cong_public_laws (accessed September 28, 2004).

² Electronic Records Policy Working Group, “Barriers to the Effective Management of Government Information on the Internet and Other Electronic Records: A Report to the Interagency Committee on Government Information” (June 28, 2004), http://www.cio.gov/documents/ICGI/ERPWG_Barriers.pdf (accessed September 28, 2004).

2. Support agencies through effective leadership and clear records management guidance.

To be accountable for information and records management compliance, agencies must have a clear understanding of what needs to be done and how to do it. Recommendation 2 states that OMB and NARA should work together to provide agencies with clear, non-conflicting guidance on information management that is easily identifiable and widely available. One of the activities proposed in this recommendation is that NARA sponsor and manage a central Internet portal for agencies to share and obtain proven information and records management guidance.

3. Create a Records Management Profile in the Federal Enterprise Architecture (FEA).

Information and records management permeates all Government business processes and crosses all lines of business, but is not in itself a separate line of business. It is an integral part of the Government's operations. In Recommendation 3, the ERPWG proposes using the recently issued FEA Security and Privacy Profile as a model for a Records Management Profile to tie together records management considerations throughout the FEA models. The Records Management Profile would provide a methodology that uses relevant FEA reference model information (i.e., context and conditions) to help business owners accurately determine information and records categorization and establish an appropriate set of information and records management controls so that records management can be as seamless and transparent as possible to the end user.

4. Establish a Federal Records Council to advise and support agencies, the PCIE, and the CIO Council with implementation of these ICGI recommendations.

Recommendation 4 supports the other three recommendations by proposing a Federal Records Council to be an ongoing support system to agencies as they implement the ICGI recommendations and NARA guidance developed for section 207(e) of the E-Government Act of 2002. This recommendation also provides a formal mechanism by which the agencies can share experiences and work together to identify strategies, best practices and solutions to electronic information and records issues.

If effectively implemented, these recommended initiatives will substantially contribute to coherent Federal information and records management policy, and to the identification and preservation of electronic information critical for Government operations and for the historical record. To facilitate implementation of the recommendations, the ERPWG strongly urges that Government-wide mechanisms already in place be used in addressing the challenges of accountability, policy and technical support, coordination, and decision-making that exist in the information and records management arena. This will help

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ensure that information and records management is integrated into all aspects of critical agency business operations rather than treated as a stand-alone, stove-piped set of burdensome and unhelpful requirements. As the Government looks into the electronic information future, these recommendations will establish confidence that information and records are managed efficiently, effectively, and without undue risk by building an infrastructure that embeds records management controls at key decision points.

BACKGROUND

The Electronic Records Policy Working Group (ERPWG) was formed under the auspices of the Interagency Committee on Government Information (ICGI), a Committee charged with implementing Section 207 of the E-Government Act of 2002 (Pub.L.107-347).³ Section 207 mandates that the ICGI recommend policies to ensure effective management of Government information on the Internet and other electronic records⁴ to the Director of the Office of Management and Budget (OMB) and the Archivist of the United States, by December 17, 2004. To fulfill this mandate, the ICGI tasked the National Archives and Records Administration (NARA) to lead the ERPWG in developing the recommendations. The ERPWG report, “Barriers to the Effective Management of Government Information on the Internet and Other Electronic Records”⁵ formed the foundation for the recommendations by identifying barriers faced by agencies attempting to manage electronic information. The policy initiatives recommended in this report address records management requirements for “other electronic records” and for “Government information on the Internet” that are determined to be Federal record material.

THE CURRENT ENVIRONMENT

The Federal Government faces ever-increasing barriers to the effective management of Government information on the Internet and other electronic records. Changes in Government management processes, especially as Federal agencies move toward automation, have magnified existing barriers and created new obstacles to Government management and retention of records as important assets. In the best of cases, agencies are meeting their daily information requirements. However, in the worst of cases, an agency’s inability to overcome barriers makes headlines.

³ E-Government Act of 2002, Public Law 107-347, 107th Cong., 2d sess. (December 17, 2002), http://frwebgate.access.gpo.gov/cgi-bin/useftp.cgi?IPaddress=162.140.64.21&filename=publ347.107&directory=/disk/wais/data/107_cong_public_laws (accessed September 28, 2004).

⁴ Records include:

- all books, papers, maps, photographs, machine readable materials, or other documentary materials,
- regardless of physical form or characteristics,
- made or received by an agency of the United States Government
 - under Federal law or
 - in connection with the transaction of public business
 - and preserved or appropriate for preservation by that agency or its legitimate successor
 - as evidence of the organization, functions, policies, decisions, procedures, operations or other activities of the Government or
 - because of the informational value of the data in them (44 U.S.C. 3301).

⁵ Electronic Records Policy Working Group, “Barriers to the Effective Management of Government Information on the Internet and Other Electronic Records: A Report to the Interagency Committee on Government Information” (June 28, 2004), http://www.cio.gov/documents/ICGI/ERPWG_Barriers.pdf (accessed September 28, 2004).

Federal agencies face the following realities of the current business environment:

- An overwhelming volume of information and records,
- A lack of agency processes supporting distributed management of information and records,
- Issues of authenticity, reliability, and integrity of electronic records,
- Rapid technological obsolescence of the hardware and software used to create and store electronic information and records, and
- Ineffective implementation of information and records management processes and procedures.

Federal agencies need a coordinated strategy to help them manage their information and records throughout the lifecycle.

RESPONSIBILITY FOR MANAGING RECORDS AND INFORMATION

The Federal Records Act, as amended and codified in Title 44 of the United States Code (U.S.C.), 3101 and 3102 places responsibility on agencies to create and preserve records that adequately document their missions and functions, policies, procedures, decisions and transactions. The E-Government Act of 2002 directs agencies to apply these statutory mandates to Government information on the Internet (web content records) and other electronic records.

The Clinger-Cohen Act of 1996 requires that major Federal Agencies establish the position of Chief Information Officer having clear authority, responsibility and accountability for the Agency's information resources management activities, and providing for greater coordination among the Agency's information stakeholders. OMB Circular A-130 identifies the Chief Information Officer as the official, appointed by the head of the agency, to "implement and enforce records management policies and procedures including requirements for archiving information maintained in electronic format, particularly in the planning, design, and operation of information systems".⁶

PURPOSE

This report recommends a Government-wide, coordinated information and records management strategy to assist agencies in overcoming barriers and in meeting their information and records management responsibilities in the current environment. This strategy represents a significant opportunity for the Federal Government to improve the management of Government information on the Internet and other electronic records.

⁶ Office of Management and Budget, OMB Circular A-130, Revised, (Transmittal Memorandum No. 4) Management of Federal Information Resources (11/28/2000)
<http://www.whitehouse.gov/omb/circulars/a130/a130trans4.pdf>, 18 (accessed October 15, 2004).

By providing this report for public review, the ERPWG, under the direction of the ICGI, invites stakeholders to comment. Stakeholders such as OMB, the ICGI working groups, Federal agencies, vendors, consultants, communities of practice, professional associations, state and local governments, the public and other interested constituencies are encouraged to provide input.

This report details four high-level recommendations with proposed implementing activities and timelines. They are:

- 1. Improve accountability for records management**
- 2. Support agencies through effective leadership and clear records management guidance**
- 3. Create a Records Management Profile in the Federal Enterprise Architecture (FEA)**
- 4. Establish a Federal Records Council to advise and support agencies, the PCIE, and the CIO Council with implementation of these ICGI recommendations.**

All four recommendations need to be understood as mutually supportive strategies dealing with accountability, Government-wide policy and technical support, high-level advocacy and coordination, and the infusion of information and records management requirements into agency business processes and decision-making. Reviewers should evaluate the ability of the recommendations, individually and when taken together, to address the following barriers identified in the ERPWG report, “Barriers to the Effective Management of Government Information on the Internet and Other Electronic Records”:

- Records and information are not managed as agency business assets.
- Records management is not viewed as critical to agency mission. It is either not incorporated into business processes, or not incorporated early enough, particularly as these processes are automated.
- Marginal support for records management has led to a lack of training, tools, and guidance for all staff within Federal agencies.
- The records management and information technology disciplines are poorly integrated within Federal agencies.

If effectively implemented, these recommendations will substantially contribute to coherent Federal information and records management policy, and to the identification and preservation of electronic information critical for Government operations and for the historical record. To facilitate implementation of the recommendations, the ERPWG strongly urges that Government-wide mechanisms already in place be used in addressing the challenges of accountability, policy and technical support, coordination, and decision-making that exist in the information and records management arena. This will help

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ensure that information and records management is integrated into all aspects of critical agency business operations rather than treated as a stand-alone, stove-piped set of burdensome and unhelpful requirements. As the Government looks into the electronic information future, these recommendations will establish confidence that information and records are managed efficiently, effectively, and without undue risk by building an infrastructure that embeds records management controls at key decision points.

RECOMMENDATION 1: IMPROVE ACCOUNTABILITY FOR RECORDS MANAGEMENT

Stakeholders (over 200 in seven outreach sessions) identified the lack of accountability for effective information management in the Federal Government as a key problem that causes agencies to place a low priority on information management (and particularly records management). This low priority is at the “root” of the barriers that each recommendation is intended to address.

OMB and NARA must identify appropriate mechanisms to evaluate compliance with existing legislation and establish incentives for agencies to take action to properly manage and protect their records as valuable Government assets. Agencies must have an expectation that their actions have important positive or negative consequences and there needs to be an effective mechanism for evaluating agency actions. The statutory mandates that assign accountability are outlined under the section on RESPONSIBILITY FOR RECORDS AND INFORMATION MANAGEMENT.

The ERPWG recommends that:

- **OMB and NARA should work with agencies, the President’s Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE)⁷ to identify and implement appropriate accountability and enforcement mechanisms for information and records management.**

The ERPWG recommends that NARA should assist agencies in developing accountability mechanisms within their business processes. The ERPWG also recommends that OMB, NARA and the Inspector General (IG) community work together to determine the best ways to address information and records management issues as part of ongoing evaluations of information technology (IT) management and electronic government policies and practices.

The Inspector General (IG) community has two primary roles: to independently find and report on current problems, and to prevent future problems by fostering integrity, accountability, and excellence in government programs.⁸ IGs continue to report IT as the Government’s top management challenge. As with IT security, effective information and records management is part of the IT challenge facing every agency. The IG Act specifically requires IGs to summarize their most significant recent reports—as well as agency management’s action on significant IG recommendations—in a semiannual report to the Congress.

⁷ Information on the PCIE/ECIE can be found at <http://www.ignet.gov/pcieecie1.html>

⁸ President's Council on Integrity and Efficiency, Executive Council on Integrity and Efficiency, “A Progress Report to the President” (Fiscal Year 2003), <http://www.ignet.gov/randp/fy03apr.pdf>, 1, (accessed September 29, 2004).

The President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE) were established by Executive Order 12805, May 11, 1992, to address integrity, economy, and effectiveness issues that transcend individual Government agencies, and to increase the professionalism and effectiveness of IG personnel throughout the Government. The Presidentially-appointed IGs work together and coordinate their professional activities through the PCIE. IGs of designated Federal entities work together and coordinate their professional activities through the ECIE. The Deputy Director for Management of OMB chairs both the PCIE and ECIE and reports to the President on their activities. The PCIE, in conjunction with the ECIE, maintains standing committees to examine important issues. PCIE members also foster working relationships with the Chief Financial Officer (CFO), Chief Information Officers (CIO), and the Federal Acquisition Councils. Members of both Councils join together in roundtables and working groups to address a wide range of relevant issues, such as information technology security.

The ERPWG believes this combined approach – working with agencies and the IG community – will help agencies:

- internally evaluate and achieve compliance
- determine appropriate evaluation/enforcement mechanisms
- integrate records management evaluations within existing review and reporting mechanisms that are highly visible and have “clout” (such as those for IT security, privacy, continuity of operations, and emergency preparedness), and
- ensure that IG staff have the skills necessary to appropriately evaluate and enforce information and records management requirements both now and in the future.

Recommended implementing activities:

1a. NARA should work with agencies to identify ways to integrate accountability for records and information management into internal management processes.

NARA's assistance should be provided as part of the Records Management Profile in the Federal Enterprise Architecture (FEA) (proposed in recommendation three) and the experience used as the basis for developing the appropriate notional examples and recommended standards in the Profile. This assistance should also be part of the implementing activities to be conducted in conjunction with the IG community, as identified below (1b.–1e.). Guidance resulting from this work should be included in the Electronic Records Management (ERM) Toolkit (proposed in implementing activity 2a.).

- 1b. NARA should work with the IG community to determine methods for incorporating the evaluation of records and information management practices into existing review and reporting mechanisms.**

Suggested mechanisms include those currently used by the PCIE and ECIE to evaluate compliance with the Federal Information Security Management Act of 2002 (FISMA)⁹ and the Homeland Security Presidential Directive HSPD-7¹⁰.

- 1c. NARA should work with the IG community to identify and implement methods for evaluating issues pertaining to vital records in reviewing critical infrastructure protection plans within the Federal Government.**

In addition, NARA should provide OMB with guidelines for ensuring that agencies' plans for protecting their critical physical and cyber infrastructure include identification and protection of vital records. According to Homeland Security Presidential Directive HSPD-7, agencies must submit these plans to OMB for approval.

- 1d. OMB and NARA should work with the IG community to participate in the PCIE "IT Roundtable."**

OMB and NARA should participate in this forum to share, coordinate, and disseminate new information and innovations. As part of this involvement, NARA should work to include links to the ERM Toolkit (identified in implementing activity 2a) on the publicly accessible web site covering the IG community's IT activities.

- 1e. NARA should work with OMB and the Office of Personnel Management to require that the position descriptions of IG staff members include knowledge of information and records management and IT skills.**

These skills are important to other Federal workers as well. As described in implementing activity 2c, the NARA Records Management Initiatives (RMI) are addressing the records management needs of all Federal workers, IT specialists, program managers, and those responsible for identifying legal, regulatory and risk issues.

Recommended timeline:

FY 2005:

- NARA works with agencies to integrate accountability into internal management processes

⁹ E-Government Act of 2002, 44 U.S.C. Ch. 35, Subch. III – Information Security.

¹⁰ Homeland Security Presidential Directive HSPD-7 (December 17, 2003), <http://www.whitehouse.gov/news/releases/2003/12/20031217-5.html> (accessed September 28, 2004).

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- The ICGI sends request to PCIE/ECIE
- NARA and PCIE/ECIE develop objectives and requirements for accountability mechanisms
- NARA and PCIE/ECIE conduct review of accountability mechanisms and make recommendations to OMB

FY 2006:

- NARA and PCIE/ECIE deliver records and information management evaluation and enforcement strategy and implementation plan

RECOMMENDATION 2: SUPPORT AGENCIES THROUGH EFFECTIVE LEADERSHIP AND CLEAR RECORDS MANAGEMENT GUIDANCE

To be accountable for information and records management requirements, agencies must have a clear understanding of what needs to be done and how to do it. In the ERPWG targeted outreach sessions, participants emphasized the need for a “single point” source for guidance and a clear set of standards for managing Government information on the Internet (web content records) and other electronic records.

Along with the need for guidance and standards, participants expressed the strong desire for assistance from NARA to cover the range of issues that agencies expect to encounter now and in the future as they manage their information throughout the lifecycle. For example, what new skills in information and records management will be needed as the Government (and indeed, the rest of the world) uses new technologies to conduct business? All agreed that NARA should assist by developing appropriate training and education that addresses agency needs at a variety of levels, from executives and managers to practitioners.

Good information and records management can help agencies accomplish their missions.¹¹ If agencies are provided with a clear set of standards that are made understandable through educational opportunities and there are effective mechanisms for evaluating agency actions (as detailed in recommendation one), the odds for a successful outcome are significantly improved.

The ERPWG recommends that:

- **OMB and NARA should work together to provide agencies with a clear, non-conflicting set of standards and guidance on information and records management that is easily identifiable and widely available.**

NARA and OMB should leverage existing information and records management knowledge in the Federal Government to avoid “reinventing the wheel”. NARA should ensure that agencies are kept informed of the NARA Records Management Initiatives (RMI) progress and should promote and widely distribute RMI products. The RMI is currently in process and has already begun to implement positive changes in the management of Government records. Finally, NARA's training program should be kept current with new trends in records management and with the ongoing revolution in information technology so that agency records professionals can play an important role in process design, IT capital planning, and information and knowledge management in their agencies.

¹¹ “Why Records Management? Ten Business Reasons” <http://www.epa.gov/records/what/quest1.htm> (accessed September 28, 2004).

Recommended implementing activities:

2a. NARA should work with agencies to identify and share proven strategies for managing information (both electronic and paper).

OMB should approve the development of the ERPWG proposed Electronic Records Management (ERM) Toolkit. The ERM Toolkit is proposed as an Internet portal, hosted and managed by NARA. It will provide a collection of existing and proven ERM guidance tools such as case studies¹², “best practices” documents, process models, policies and directives, tips and techniques, training programs, lessons learned, presentations, and other practical tools that can be used by Federal agencies to promote and implement effective management of Government information on the Internet and other electronic records. The ERPWG will leverage existing Federal ERM knowledge by working proactively with agencies to identify ERM guidance tools and share them Government-wide via the ERM Toolkit portal. This toolkit should include resources to be developed in NARA's RMI (implementing activities 2b and 2c.).

2b. NARA should promote and share products created in the NARA RMI.

The RMI is detailed in NARA's “Strategic Directions for Records Management”¹³. The RMI provides the high-level framework for records management policies and procedures throughout the records lifecycle. The projects within the RMI are designed to address recommendations and changes for NARA's policies and procedures.

The key objectives of the RMI are:

- to achieve economical and effective records management by the Federal agencies;
- to retain records long enough to protect rights, assure accountability, and document the national experience; and
- to ensure the proper disposal of records when they are no longer needed.

¹² As an example, an agency demonstrating outstanding records management is the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), Alaska Region. The NMFS Alaska Region received one of the Archivist's Awards in 2004 for integrating records management into the daily operating procedures of a vast and diverse regional system. These procedures included developing a records management component for all NMFS Alaska Region staff performance evaluation criteria.

¹³ National Archives and Records Administration, “NARA's Strategic Directions for Federal Records Management (July 31, 2003)”

http://www.archives.gov/records_management/initiatives/strategic_directions.html Also see: “Strategic Directions September 2004 Status Report (September 20, 2004)”

http://www.archives.gov/records_management/initiatives/rm_redesign_project.html#sept04 (both accessed September 28, 2004)

The RMI consists of multiple strategies to add, modify, or eliminate current policies and procedures in order to achieve effective records management by both NARA and its customers and key stakeholders.

2c. NARA should provide training to develop or strengthen the electronic records management skills needed by program managers, records officers, and IT staff.

One of the strategies in the RMI is to redesign the content and format of NARA's training program. The redesigned program will:

- help agency records professionals better support the business needs of the agencies they serve
- highlight the importance of managing agency records as information assets and
- incorporate the principles of asset and risk management
- acquaint participants with the IT capital planning process, and
- incorporate principles from the ISO records management standard (ISO-15489) that stress the importance of authenticity, reliability, integrity and usability of records for carrying on agency business
- include modules that address the records management needs of all Federal workers, IT specialists, program managers, and those responsible for identifying legal, regulatory and risk issues. Such modules should be evaluated for inclusion by agencies in existing mandatory IT Security and ethics training programs.

NARA is also establishing a voluntary "certification of training" program that will permit participants in a core set of training modules to take an examination and receive certification of their successful completion of the training.

Certification will underscore the professionalism of records managers in the Federal Government, and will help stress the importance of Federal records management.

Recommended timeline:

FY 2005:

- Develop support structure for ERM Toolkit
 - Processes and procedures
 - Web site development
 - Tool identification
 - Release of initial version
- RMI products, as issued, are evaluated for broader applicability and inclusion in the ERM Toolkit

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- Revised NARA training program first roll out
Training modules address specific audiences
- Voluntary “certification of training”

FY 2006:

- NARA continues to populate the ERM Toolkit
- NARA training program evaluates training modules and certification

RECOMMENDATION 3: CREATE A RECORDS MANAGEMENT PROFILE IN THE FEDERAL ENTERPRISE ARCHITECTURE (FEA)

The Federal Enterprise Architecture (FEA) is a business and performance-based framework to support cross-agency collaboration, transformation, and Government-wide improvement.¹⁴ The ERPWG believes that this framework can support the infusion of information and records management requirements into agency business processes and decision-making. Information and records management requirements are similar to privacy, security, and emergency preparedness requirements. Records are essential to all Federal Government agency operations and must be managed throughout their lifecycle. They are the information assets that every agency needs to manage over time in order to accomplish its business. Records exist in every line of business and cross all lines of business, but are not in themselves a separate line of business.

The ERPWG recommends that:

- **NARA, through the Architecture and Infrastructure Committee (AIC) of the CIO Council, should develop, propose and implement a Records Management Profile for the Federal Enterprise Architecture (FEA) that ensures the statutory and regulatory requirements are incorporated in agency enterprise architectures.**

The recently issued *FEA Security and Privacy Profile*¹⁵ can provide a model for the development of a Records Management Profile within the FEA Framework. The Records Management Profile would address the management of information and records as a cross-cutting issue that affects all of the reference models in the FEA. As with security and privacy requirements, information and records requirements need to be linked at all levels of the FEA. The Records Management Profile would provide, “an understandable, consistent, repeatable, scalable, and measurable methodology that uses relevant FEA reference model information (i.e., context and conditions) to help business owners accurately determine”¹⁶ information and records categorization and establish an appropriate set of information and records management controls.

¹⁴ See <http://www.feapmo.gov/fea.asp> for more information on the FEA and its reference models.

¹⁵ Federal Enterprise Architecture Program Management Office, “The FEA Security and Privacy Profile Phase I Final: A Foundation for Government-wide Improvement “ (July 29, 2004) <http://www.cio.gov/documents/FEA%20Security%20Profile%20Phase%20IFINAL07-29-04.doc> (accessed September 28, 2004).

¹⁶ *Ibid*, 1.

Recommended implementing activities:

3a. NARA, through the Architecture and Infrastructure Committee (AIC) and the CIO Council, should develop and propose a Records Management Profile for the Federal Enterprise Architecture (FEA).

NARA and the AIC should develop a profile with appropriate notional examples (as in the FEA Security and Privacy Profile) and recommended standards (including the metadata standard to be issued by the Interagency Committee on Government Information (ICGI)) to help agencies integrate information and records management in key crosscutting processes such as:

- Strategic planning
- Business Process Design
- Capital Planning and Investment Control
- Solutions Development Lifecycle
- Enterprise Architecture
- Information Security

3b. NARA should assist agencies in implementing the Records Management Profile.

Once the Records Management Profile is developed, NARA should prepare guidance, checklists, and other tools to assist agencies in the Records Management Profile implementation. These should become part of the ERM Toolkit (implementing activity 2a).

3c. NARA should identify functional requirements for the Records Management Services Components (RMSC).

As part of the FY 2005 Electronic Records Management (ERM) Initiative, NARA will identify functional requirements for the Records Management Services Components (RMSC) that can be developed and placed in the FEA Component Registry and Repository. A service component is defined as “a self-contained business process or service with predetermined functionality that may be exposed through a business or technology interface.”¹⁷ Service components can be used in electronic environments so that records management can be as seamless and transparent as possible to the end user.

¹⁷ Architecture and Infrastructure Committee, Federal Chief Information Officers Council, “Component-Based Architectures”, Version 2.0. (June 2004), http://cio.gov/documents/CIOC_AIC_Service%20Component%20Based%20Architectures%20_2.0_FINALE.pdf, 11, (accessed September 28, 2004).

Recommended timeline:

FY 2005:

- The Electronic Records Management Initiative identifies Records Management Services Components (RMSC) functional requirements
- NARA, with AIC, develops RM Profile framework

FY 2006:

- RM Profile framework developed and issued by Federal Enterprise Architecture Program Management Office (FEAPMO)
- NARA assists agencies in implementing the RM Profile
- The ICGI metadata standard is adopted by agencies

**RECOMMENDATION 4: ESTABLISH A FEDERAL RECORDS COUNCIL TO
ADVISE AND SUPPORT AGENCIES, THE PCIE, AND THE CIO COUNCIL WITH
IMPLEMENTATION OF THESE ICGI RECOMMENDATIONS**

As noted in the EXECUTIVE SUMMARY, the ICGI recommendations in this report must be seen as an integrated set of policy initiatives that must be implemented in concert to achieve a coherent Federal information and records management policy for Government information on the Internet and other electronic records, and identifying and preserving electronic information critical for Government operations and for the historical record. Recommendation 4 supports the other three recommendations by providing an ongoing support system to agencies as they implement the ICGI recommendations and NARA guidance developed for section 207(e) of the E-Government Act of 2002. This recommendation also provides a formal mechanism by which the agencies can share experiences and work together to identify strategies, best practices and solutions to electronic information and records issues.

The recommended Federal Records Council will contribute advice and support to the CIO Council as it carries out the mandate levied by the new 44 U.S.C. 3603(f) relating to records and information management¹⁸; to NARA and OMB as the Archivist carries out his responsibilities under section 207(e)(2) to issue guidance and implementation time tables¹⁹; and to the ICGI as it continues to fulfill its mandate to “share effective practices for access to, dissemination of, and retention of Federal information” under section 207(c)(3)(C).

The ERPWG recommends that:

- **A Federal Records Council be established to advise and support Agencies, the PCIE, and the CIO Council with implementation of these ICGI recommendations**

¹⁸ 44 U.S.C. 3603(f) states “The Council shall perform functions that include the following:

* * *

“(6) Work with the Office of Personnel Management to assess and address the hiring, training, classification, and professional development needs of the Government related to information resources management.

“(7) Work with the Archivist of the United States to assess how the Federal Records Act can be addressed effectively by Federal information resources management activities.”

¹⁹ Sec. 207(e)(2) states “the Archivist of the United States shall issue policies—

(A) requiring the adoption by agencies of policies and procedures to ensure that chapters 21, 25, 27, 29, and 31 of title 44, United States Code, are applied effectively and comprehensively to Government information on the Internet and to other electronic records; and

(B) imposing timetables for the implementation of the policies, procedures, and technologies by agencies.

The Federal Records Council would be charged with fostering communications, improving coordination and identifying educational needs related to electronic records management. It would work closely with affiliated partner organizations, such as the CIO Council and the PCIE, in identifying and advising on the implementing actions those bodies should take. To be chaired by NARA, its membership would include high-level Federal records management officials, legal staff, information technology officials, and web content managers.

Because agencies and the CIO Council, not the Federal Records Council, are responsible for implementing the ICGI recommendations, the following section of this recommendation suggests areas in which the Federal Records Council could take a lead in providing support instead of the implementing activities identified in the other three recommendations.

Suggested early support activities:

The ERPWG recommends that the following be among the Federal Records Council's early activities:

- Determine and carry out appropriate communication, education, and other activities to support and promote implementation of the ICGI recommendations in this report.
- Develop recommendations for core competencies in records and information management at all levels in cooperation with the Workforce & Human Capital for IT Committee of the CIO Council.
- Work with the Federal Enterprise Architecture Program Management Office (FEAPMO) and the Architecture and Infrastructure Committee (AIC) of the CIO Council concerning the Records Management Profile (identified in recommendation three).

Recommended timeline:

FY 2005:

- Develop Federal Records Council Charter
- Members nominated and selected
- Determine appropriate activities to support and promote implementation of the ICGI recommendations

FY 2006:

- Recommendations for core competencies developed
- Records Management Profile developed with the FEAPMO and AIC

TIMELINE

The E- Government Act of 2002 stipulates that by December 17, 2004 (“not later than 2 years after the date of enactment of this Act”²⁰), the ICGI shall submit recommendations for policies to enhance the effective management of Government information on the Internet and other electronic records to the Director of OMB and the Archivist of the United States. The recommendations in this report comprise four policy initiatives, each with several inherent specific implementation mechanisms. By December 17, 2005 (“not later than 1 year after the submission of recommendations by the Committee”²¹), “the Archivist of the United States shall issue policies requiring the adoption by agencies of policies and procedures ... and imposing timetables for the implementation of the policies, procedures and technologies by agencies.”²² The four policy initiatives recommended in this report and the associated implementation mechanisms comprise the ICGI’s recommendations to the Director of OMB and the Archivist.

Because of the working group's sense of urgency surrounding effective management of Government information on the Internet and other electronic records that are determined to be Federal record material, it respectfully presumes the possibility of a speedier concurrence than the statutory deadline and proposes immediate action (sooner than December 17, 2005) on several implementations of these four policy initiatives, as described in the following timeline.

Timeline – FY 2005 / Early FY 2006:

January 2005 – November 2005: The ICGI and the ERPWG

- Develop framework, implementation plans for recommendations
- Confer with stakeholders, other e-Government initiatives to ensure plans coordinated with these efforts

December 2005: The Archivist of the United States

- issues policies requiring the adoption by agencies of policies and procedures for effective management of electronic records, including Government information on the Internet (web content)
- imposes timetables for the implementation of the policies, procedures and technologies by agencies

²⁰ E-Government Act of 2002, Public Law 107-347, 107th Cong., 2d sess. (December 17, 2002), sec. 207(e)(1).

²¹ Ibid, sec. 207(e)(1).

²² Ibid.

Proposed Timeline for Implementation of ERPWG Recommendations

FY 2005	FY 2006
<p>Recommendation 1</p> <ul style="list-style-type: none">- NARA works with agencies to integrate accountability into internal management processes- The ICGI sends request to PCIE/ECIE- Objectives/requirements for accountability submitted to OMB- Review of accountability mechanisms conducted, recommendations submitted to OMB	<p>Recommendation 1</p> <ul style="list-style-type: none">- Evaluation and enforcement strategy developed and implementation plan submitted to OMB
<p>Recommendation 2</p> <ul style="list-style-type: none">- Initial release of ERM toolkit- Revised NARA Training Program implemented for multiple audiences- “Certification of training” program established	<p>Recommendation 2</p> <ul style="list-style-type: none">- NARA continues to populate the ERM Toolkit- NARA training and certification program evaluated
<p>Recommendation 3</p> <ul style="list-style-type: none">- RM Services Components (RMSC) functional requirements defined- NARA with AIC develops RM profile framework	<p>Recommendation 3</p> <ul style="list-style-type: none">- RM profile developed and issued by Federal Enterprise Architecture Program Management Office (FEAPMO)- NARA assists agencies in implementing the RM profile- The ICGI metadata standard is adopted by agencies
<p>Recommendation 4</p> <ul style="list-style-type: none">- Develop Federal Records Council Charter- Members nominated and selected- Determine appropriate activities to support and promote implementation of the ICGI recommendations	<p>Recommendation 4</p> <ul style="list-style-type: none">- Recommendations for core competencies developed- RM Profile developed with FEAPMO and AIC

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Government Information on the Internet and Other Electronic Records

Appendix A – ERPWG Members

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²³ Jeffrey Levy served on the ERPWG as EPA Co-representative/ Liaison with Web Content Standards WG until September 1, 2004. Richard Huffine became the EPA Co-representative at that time.