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

DECEMBER 16, 2004

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EXECUTIVE SUMMARY

Section 207 of the E-Government Act of 2002 (Pub.L.107-347) 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 ICGI established an Electronic Records Policy Working Group (ERPWG) to conduct studies and public outreach in order to develop these recommendations. This document reflects the ERPWG work and ICGI deliberations. We believe 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. The recommendations need to be understood as mutually supportive, interdependent strategies that should be implemented in concert. These recommendations cover Government-wide policy and technical support, high-level advocacy and coordination, the infusion of information and records management requirements into agency business processes and decision-making, and accountability.

The recommendations in this report propose policies and procedures to:

1. **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. Recommendation one calls for OMB, the National Archives and Records Administration (NARA) and the General Services Administration (GSA) to work together to provide agencies with clear, non-conflicting, easily identifiable, and widely available guidance on information management. One of the activities proposed in this recommendation is NARA should sponsor and manage a central Internet portal for agencies to share and obtain proven information and records management guidance.

2. **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. It is an integral part of the Government's operations. In Recommendation two, the ICGI recommends 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 using relevant FEA reference model information (i.e., context and conditions) to help business process owners accurately determine information and records categorization and establish an appropriate set of information

and records management controls to enable records management to be as seamless and transparent as possible to the end user.

3. Improve accountability for records management.

Recommendation three addresses the low priority assigned to information and records management, and the need for an effective mechanism for evaluating agency compliance with their statutory records management responsibilities. Recommendation three proposes OMB and NARA work with agencies to identify and implement appropriate accountability and enforcement mechanisms for information and records management. In addition, NARA should provide these mechanisms, standards, and guidance to the Inspector General (IG) Community, the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE) to assist them in evaluating information and records management compliance as part of their reviews of agency programs and information technology management.

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 ICGI 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 ensure 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. Ongoing NARA records management initiatives, such as the records management redesign initiative and targeted assistance, play an important part in accomplishing this effort. 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).[1] Section 207 mandates that the ICGI recommend policies to ensure effective management of Government information on the Internet and other electronic records[2] 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 recommendations for ICGI consideration. The ERPWG report, "Barriers to the Effective Management of Government Information on the Internet and Other Electronic Records"[3] formed the foundation for the recommendations by identifying barriers faced by agencies attempting to manage electronic information.[4] Hereafter, "Government information on the Internet and other electronic records," the language used in the Act, will be referred to simply as "Government electronic records."

This document reflects the ERPWG work and ICGI deliberations. An overview of the process followed to develop these recommendations is in Appendix C.

THE CURRENT ENVIRONMENT

The Federal Government faces ever-increasing barriers to the effective management of Government electronic records. Changes in Government management processes as Federal agencies have embraced automation have magnified existing barriers and created new obstacles to Government management and retention of records as important assets. In the

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

[2] 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).

[3] 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).

[4] The Web Content Management Working Group, also under the Interagency Committee on Government Information (ICGI), addressed other requirements for Government electronic records on the Internet .

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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.

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

In addition to the issues presented by other electronic records, Government information on
the Internet has other unique issues. These include frequent updating and revision of
information and compound documents that link to a wide variety of resources (within and
external to Government) that may not remain stable. Agencies must follow electronic
records management regulations and must document all of their agency programs (44
U.S.C. 3101), including web sites used to share information internally (Intranet) and
communicate agencies' overall public message (Government information on the Internet).

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

The Clinger-Cohen Act of 1996 requires major Federal agencies to establish the position of
Chief Information Officer (CIO) 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." [5]

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[5] 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).

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 electronic records.

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

1. **Support agencies through effective leadership and clear records management guidance**
2. **Create a Records Management Profile in the Federal Enterprise Architecture (FEA)**
3. **Improve accountability for records management**

All three recommendations need to be understood as mutually supportive, interdependent strategies that should be implemented in concert. Certain activities, such as evaluating the degree to which an agency is conforming to records management requirements, will depend on development of guidance and tools to assess accountability. These recommendations cover Government-wide policy and technical support, high-level advocacy and coordination, the infusion of information and records management requirements into agency business processes and decision-making, and accountability. When taken together, the recommendations address the four barriers identified in the earlier ERPWG "Barriers" Report:

- 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 ICGI strongly urges that Government-wide mechanisms already in place be used in addressing the challenges of policy and technical support, coordination, decision-making, and

accountability that exist in the information and records management arena. This will help ensure 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. Ongoing NARA records management initiatives, such as the records management redesign initiative and targeted assistance, play an important part in accomplishing this effort. 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: SUPPORT AGENCIES THROUGH EFFECTIVE LEADERSHIP AND CLEAR RECORDS MANAGEMENT GUIDANCE

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

To meet accountability requirements for information and records management, agencies must first 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 in the stakeholder meetings expressed the strong desire for assistance from NARA to cover the range of issues 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 NARA should assist by developing appropriate training and education to address agency needs at a variety of staff levels, from executives and managers to practitioners.

Good information and records management can help agencies accomplish their missions.[6] If agencies are provided with a clear set of standards made understandable through educational opportunities and there are effective mechanisms for evaluating agency actions (as detailed in recommendation three), the odds for a successful outcome are significantly improved.

The ICGI recommends that:

- **OMB, NARA and GSA 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.**

In carrying out this recommendation, OMB, NARA, and GSA should leverage existing information and records management programs and knowledge in the Federal Government to avoid "reinventing the wheel." NARA's Records Management Initiatives (RMI) supporting its records management redesign effort [7] will play an important role in carrying

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[6] "Why Records Management? Ten Business Reasons" http://www.epa.gov/records/what/quest1.htm (accessed September 28, 2004).
[7] See http://www.archives.gov/records_management/initiatives/rm_redesign_project.html (accessed December 1, 2004).

out this recommendation. The RMI is currently in progress and has already begun to implement positive changes in the management of Government records. NARA should continue its work on revising regulations and guidance to clarify records management program requirements, to provide agencies with greater flexibility in meeting these requirements, and to address electronic records issues. NARA's redesigned 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.

Recommended implementing activities:

1a. NARA and GSA 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 within existing resources. It will provide a collection of existing and proven ERM guidance tools such as case studies,[8] "best practices" documents, process models, policies and directives, tips and techniques, training programs, lessons learned, presentations, and other practical tools Federal agencies can use to promote and implement effective management of Government 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. The ERM Toolkit content will be reviewed on a regular basis in order to keep the materials current and reflect all changes as soon as they are effected. The ERM Toolkit should also include resources as they are developed in NARA's Records Management Initiatives (implementing activities 1b and 1c.).

1b. NARA should promote and share products created in the NARA Records Management Initiatives (RMI).

The Records Management Initiatives (RMI) are detailed in NARA's "Strategic Directions for Records Management".[9]   The RMI provides the high-level framework

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[8] 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.

[9] 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)"

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
- Retain records long enough to protect rights, assure accountability, and document the national experience and
- Ensure the proper disposal of records when they are no longer needed.

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

1c. 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;
- incorporate the principles of asset and risk management;
- acquaint participants with the IT capital planning process;
- incorporate principles from the ISO records management standard   (ISO-15489) stressing the importance of authenticity, reliability, integrity and usability of records for carrying on agency business; and
- include modules to 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 to permit participants in a core set of training modules to take an examination and receive certification of their successful completion of the training. This certification is not intended to replace a professional Certified Records Manager program but may serve as a preliminary step to undertaking formal certification. The NARA certification of

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

training documents competencies in managing Federal records and will help stress the importance of Federal records management. [10]

Recommended timeline:

FY 2005:
- Develop support structure for ERM Toolkit
  - Processes and procedures
  - Web site development
  - Tool identification
  - Release of initial version
- Evaluate NARA records management products, as issued, for inclusion in the ERM Toolkit
- NARA rolls out first revised training program
  - Address specific audiences in training modules
  - Implement voluntary "certification of training"

FY 2006:
- NARA continues to populate the ERM Toolkit
- NARA training program evaluates training modules and certification

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[10] The Institute of Certified Records Managers (http://www.icrm.org/) offers a program designed to certify records management competencies on a formal basis. Attaining the Certified Records Manager (CRM) designation is based on educational background, professional work experience and successful completion of a six part examination. Such certification underscores the professionalism of records managers in the Federal Government.

RECOMMENDATION 2: 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.[11] The ERPWG believes 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 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.

The ICGI 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) to ensure the statutory and regulatory requirements are incorporated in agency enterprise architectures.**

The recently issued *FEA Security and Privacy Profile*[12] 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 affecting 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 using relevant FEA reference model information (i.e., context and conditions) to help business owners accurately determine"[13] information and records categorization and establish an appropriate set of information and records management controls.

Recommended implementing activities:

2a. **NARA, through the Architecture and Infrastructure Committee (AIC) of the CIO Council, should develop and propose a Records Management Profile for the Federal Enterprise Architecture (FEA).**

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[11] See http://www.feapmo.gov/fea.asp for more information on the FEA and its reference models.
[12] 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).
[13] Ibid, 1.

NARA and the AIC should develop a profile with appropriate notional examples (as in the FEA Security and Privacy Profile) and recommended standards 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
- Program Implementation

2b. 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 1a).

2c. 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) to 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."[14] Service components can be used in electronic environments so records management can be as seamless and transparent as possible to the end user.

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[14] 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_FINAL.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 the RM Profile framework

FY 2006:
- The Federal Enterprise Architecture Program Management Office (FEAPMO) develops and issues the RM Profile framework
- NARA assists agencies in implementing the RM Profile

RECOMMENDATION 3: IMPROVE ACCOUNTABILITY FOR RECORDS MANAGEMENT

As stated in the introductory section of this report, 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 electronic records.

The Clinger-Cohen Act of 1996 and OMB Circular A-130 address the responsibilities of the Chief Information Officer 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." [15]

Agencies are responsible and need to be accountable for managing their electronic records and information. Stakeholders were clear on the need to address the low priority assigned to information and records management as well as accountability for records management. Accountability needs to be understood and communicated to all staff, from senior managers to program staff and to agency contractors. OMB and NARA must provide agencies with guidance so the agencies can evaluate compliance with existing laws and regulations, assist them in identifying and implementing corrective actions, and establish incentives for agencies to take action to properly manage and protect their records as valuable Government assets. NARA must work with the Inspector General Community to ensure agencies expect their actions regarding information and records management have important positive or negative consequences and to establish effective mechanisms for evaluating agency actions.

The ICGI recommends that:

- **OMB and NARA should provide agencies with practical guidance needed to perform internal records management compliance evaluations and assist them in identifying and implementing corrective actions. In addition, NARA should assist the Inspector General (IG) Community, the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE) in leveraging existing mechanisms to evaluate information and records management as part of their work to address challenges in information technology.**

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[15] 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).

The ICGI recommends NARA should leverage the standards and guidance developed by implementing recommendation one (including the Records Management Initiatives and the ERM Toolkit) to assist agencies in evaluating their information and records management programs. Tools, such as agency self-assessment checklists, can be used by agencies to evaluate records management compliance within their business processes. NARA currently offers a "targeted assistance" program designed to help agencies with specific records management problems.[16] This program will play an important part in implementing this recommendation.

NARA guidance tools may be helpful to the Inspector General (IG) community as they carry out their normal course of audits and investigations. In conducting these audits and investigations, IGs take into consideration the availability and quality of agency program documentation, i.e., records. The ICGI recommends NARA work with the IG community, using NARA-developed guidance and standards to identify the best ways to address information and records management issues as part of ongoing, routine IG evaluations of agency programs and information technology (IT) management.

To ensure coordination of NARA assistance to the IG community, NARA should work directly with the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE)[17] in carrying out this recommendation.

In the most recent progress report (2003) from the President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE), IGs continue to report IT as the Government's top management challenge. [18] As with IT security, effective information and records management is part of the IT challenge facing every agency. The PCIE/ECIE progress report needs to highlight the impact poor records management creates in carrying out agency programs.

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[16] Targeted Assistance is a customer-driven and project-oriented program in which the agency and NARA form a partnership to solve the agency's records management problems. The partnership develops a project with a well-defined purpose, tangible products, definite milestones, and a time frame for completion. Projects can last from several days to several months.

[17] The PCIE and 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) Council, Chief Information Officers (CIO) Council, and the Federal Acquisition Council. Members of both Councils join together in roundtables and working groups to address a wide range of relevant issues, such as information technology security. Information on the PCIE/ECIE can be found at http://www.ignet.gov/pcieecie1.html

[18] 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 ICGI believes a two-pronged approach – working with agencies and the IG community through the PCIE/ECIE – will help agencies:

- evaluate internally and achieve compliance;
- determine appropriate corrective actions; and
- integrate records management evaluations within existing review and reporting mechanisms. Mechanisms should be highly visible and have "clout" (such as those for IT security, privacy, continuity of operations, and emergency preparedness).

Recommended implementing activities:

3a. NARA should work with agencies to identify ways to integrate accountability for records and information management into internal management processes.

NARA's current programs will guide this implementing activity. In addition, the standards and guidance developed by implementing recommendation one (including the Records Management Initiatives and the ERM Toolkit) will provide a means for agencies to evaluate their compliance.[19]

NARA's assistance should also be provided as part of implementing the Records Management Profile in the Federal Enterprise Architecture (FEA) (proposed in recommendation two). NARA's experience in assisting agencies and developing standards and guidance can be used as the basis for developing the appropriate notional examples and recommended standards in the Profile. Guidance resulting from this work should be included in the Electronic Records Management (ERM) Toolkit (proposed in implementing activity 1a.).

3b. NARA should work with the IG community to suggest methods for incorporating the evaluation of records and information management practices into existing review and reporting mechanisms.

As stated above, NARA will provide checklists or other tools IGs can use in the course of their normal activities to benchmark agency compliance with records and information management requirements. NARA will also work with the IG community to advise them on the statutory records management requirements agencies must meet. ICGI suggests the tools would be similar to those currently used by the PCIE and ECIE to evaluate compliance with the Federal Information Security Management Act of 2002

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[19]One example suggested by stakeholders was for NARA to create an agency records management "scorecard" (green, yellow, red). NARA would develop criteria for how to "get to green" on key areas of electronic records management, such as:

- Creating records schedules for all mission critical systems as well as web content that qualifies as Federal record material
- Following the records schedules by disposing of expired records (both paper and electronic), and ensuring that valuable records are segregated and maintained for the required time
- Transferring long term and "permanent" records to NARA, including electronic records transfer

(FISMA)[20] and the Homeland Security Presidential Directive HSPD-7.[21] Agencies implement the requirements, while the IGs evaluate their compliance with the requirements.

3c. NARA should identify methods for evaluating issues pertaining to vital records in reviewing critical infrastructure protection plans within the Federal Government.

NARA should provide agencies with guidance and OMB with a list of indicators for ensuring 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.

3d. NARA should work with the IG community to participate in the PCIE "IT Roundtable."

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 1a) on the publicly accessible web site covering the IG community's IT activities.

3e. NARA should work with the Office of Personnel Management to implement mechanisms to require knowledge of information and records management.

These skills are important to all Federal workers and are part of ensuring records and information management is taken seriously and senior management is accountable. It will reinforce the concept that accountability needs to be understood and communicated to all staff, from senior managers to program staff and to agency contractors. As described in implementing activity 1c, the NARA Records Management Initiatives (RMI) are addressing the records management training needs of all Federal workers, IT specialists, program managers, and those responsible for identifying legal, regulatory, and risk issues. Working with OPM, NARA should identify positions critical to implementing these recommendations and identify appropriate knowledge and skills required for those positions. NARA has begun by identifying the records and information management requirements in an SES level position description for records managers.

Recommended timeline:

FY 2005:
- NARA develops tools and works with agencies to integrate accountability into internal management processes
- NARA begins collaboration with the PCIE/ECIE

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[20] E-Government Act of 2002, 44 U.S.C. Ch. 35, Subch. III – Information Security.
[21] Homeland Security Presidential Directive HSPD-7 (December 17, 2003), http://www.whitehouse.gov/news/releases/2003/12/20031217-5.html (accessed September 28, 2004).

FY 2006:
- NARA provides tools, checklists to benchmark agency performance to the PCIE/ECIE
- NARA and PCIE/ECIE review accountability mechanisms

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"[22]), 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 three 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"[23]), "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."[24] The three policy initiatives recommended in this report and the associated implementation mechanisms comprise 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 electronic records, the ERPWG proposed immediate action (sooner than December 17, 2005) on several implementation steps of these three policy initiatives, as described in the following timeline. The ICGI supports the early accomplishment of these steps.

Timeline – FY 2005 / Early FY 2006:

January 2005 – November 2005: ERPWG, assisting NARA

- Develop framework, implementation plans for recommendations
- Confer with stakeholders, or other working groups to ensure plans are 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

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[22] E-Government Act of 2002, Public Law 107-347, 107th Cong., 2d sess. (December 17, 2002), sec. 207(e)(1).
[23] Ibid, sec. 207(e)(1).
[24] Ibid.

**Proposed Timeline for
Implementation of ICGI Recommendations
for Effective Records Management**

FY 2005	FY 2006

Recommendation 1
- Release ERM toolkit
- Implement revised NARA Training Program for multiple audiences
- Establish "Certification of training" program

Recommendation 2
- Define RM Services Components (RMSC) functional requirements
- NARA with AIC develops RM profile framework

Recommendation 3
- NARA develops tools and works with agencies to integrate accountability into internal management processes
- NARA begins collaboration with the PCIE/ECIE

Recommendation 1
- NARA continues to populate the ERM Toolkit
- NARA evaluates training and certification program

Recommendation 2
- The Federal Enterprise Architecture Program Management Office (FEAPMO) develops and issues the RM profile
- NARA assists agencies in implementing the RM profile

Recommendation 3
- NARA and PCIE/ECIE review accountability mechanisms
- NARA provides tools, checklists to benchmark agency performance to the PCIE/ECIE

Appendix A – ERPWG Members

Name	Agency	Title	E-mail
Federal Agency Members			
Bob Deyling	AOUSC	Senior Attorney, Office of Judges Programs	Robert_Deyling@ao.uscourts.gov
Michele Heffner	GSA	Director, Emerging Policy Development Division	michele.heffner@gsa.gov
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Richard Huffine		Federal Manager, EPA National Library Network	huffine.richard@epa.gov
Wendy Cleland-Hamnett[26]		Deputy Director, Office of Information Collection	cleland-hamnett.wendy@epamail.epa.gov
Deborah Williams		Chief, Record/FOIA/Privacy Branch	williams.deborah@epamail.epa.gov
Alternate: Sara Hisel-McCoy		Assoc. Dir., Collections Strategies Division, OIC	hisel-mccoy.sara@epa.gov
Ed McCeney Alternate: Tom McClay	DOI	DOI Records Officer DOI Webmaster	edwin_mcceney@ios.doi.gov Thomas_McClay@ios.doi.gov
Gladys Myatt Alternate: Rosalye Settles	Treasury	Assistant Director Records & Information Mgmt. Records Officer	gladys.myatt@do.treas.gov Rosalye.settles@do.treas.gov
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Jeanette (Jennie) Plante	DOJ	Special Assistant United States Attorney	jeanette.plante@usdoj.gov
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Loise Russell	VA	Director, Records Management Service	Loise.Russell@mail.va.gov
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NARA Members			
Michael Kurtz	NARA	Chair of Working Group	michael.kurtz@nara.gov
Nancy Allard	NARA	Co-Manager ERM Initiative, Liaison with ICGI Web Standards WG	nancy.allard@nara.gov
Fynnette Eaton	NARA	Electronic Records Archives (ERA)	fynnette.eaton@nara.gov
Mark Giguere	NARA	Co-Manager ERM Initiative	mark.giguere@nara.gov
Pamela Mason (Secretariat)	NARA	Electronic Records Policy Specialist (Secretariat)	pamela.mason@nara.gov
Susan Sullivan	NARA	Liaison with ICGI Categorization of Information WG	susan.sullivan@nara.gov

[25] Jeffrey Levy served on ERPWG as Liaison with Web Content Standards WG until September 1, 2004. Richard Huffine became the Liaison at that time.
[26] Ms. Cleland-Hamnett served as EPA's representative until April 16, 20004. Ms. Williams replaced her.

Appendix B – List of Acronyms

AIC – Architecture and Infrastructure Committee

CFO – Chief Financial Officer

CIO – Chief Information Officer

CRM – Certified Records Manager

ECIE – Executive Council on Integrity and Efficiency

ERM – Electronic Records Management

ERPWG – Electronic Records Policy Working Group

FEA – Federal Enterprise Architecture

FEAPMO – Federal Enterprise Architecture Program Management Office

FISMA – Federal Information Security Management Act of 2002

GSA – General Services Administration

HSPD – Homeland Security Presidential Directive

ICGI – Interagency Committee on Government Information

IG – Inspector General

IM – Information Management

ISO – International Organization for Standardization

IT – Information Technology

NARA – National Archives and Records Administration

OMB – Office of Management and Budget

PCIE – President's Council on Integrity and Efficiency

RM – Records Management

RMI – Records Management Initiatives

RMSC – Records Management Services Components

Appendix C –Overview of the Process Used to Develop Recommendations

The ERPWG, under the direction of the ICGI, began work in January 2004, charged with developing procedures and policies for ensuring the effective management of Government electronic records

Barrier identification process through targeted outreach and public notice

The ERPWG involved stakeholders in defining pertinent elements of the E-Government Act of 2002 ("barriers", "effective management", "Government information on the Internet", "other electronic records", "records"). The ERPWG conducted six professionally facilitated targeted outreach sessions with more than 200 stakeholders, both internal and external to the Government, and one general public meeting.

Over 200 individuals attended the targeted outreach meetings. Three targeted meetings were held for stakeholders internal to the Government. Participants included members of the CIO Council, Congressional staff, agency Records Officers, web content managers, agency General Counsels, librarians, Inspectors General, and representatives from the General Accounting Office (GAO) and the Government Printing Office (GPO). A fourth internal meeting was held for participants from the National Archives and Records Administration. Two targeted meetings were held for stakeholders external to the Government. Participants at these meetings included representatives from various Government "watchdog," library, historical, and archival organizations, and members of the education and research community.   The seventh meeting was a general public meeting. Additional information about these meetings can be found in Appendix B of the "Barriers" Report.

In addition, in order to obtain as much input as possible, requests for comments were sent to a variety of listservs concerned with Government documents, records management, archives, and libraries. Federal Register notices were published for the public meeting and the request for comments. The comment period was open from March 5, 2004, through April 5, 2004. The complete list of listservs and the text of the announcements can be found in Appendix C of the "Barriers" Report.

Review of barriers in the laws, regulations, and guidance

The ERPWG reviewed the relevant portions of pertinent laws (i.e., statutes), regulations, and agency guidance to evaluate whether these authorities create any regulatory barriers to the effective management of Government electronic records. A complete list of the authorities reviewed is in Appendix A of the "Barriers" Report.

Development of the recommendations

From the stakeholder input and review of authorities, the ERPWG identified the significant barriers to effective management of electronic records and information on the Internet and potential approaches to overcome the barriers. These were stated in the "Barriers" Report, June 28, 2004.

The first step in developing the recommendations was seeking public comment on the draft "Barriers" report.   The report was posted to the Interagency Coommittee on Government Information (ICGI) web site at http://www.cio.gov/documents/ICGI.html on July 1, 2004. Comments were solicited from all ICGI Working Group members and from all organizations and individuals (internal and external to Government) who participated in any of the ERPWG seven targeted outreach sessions held from February – April 2004. The 30-day comment period ended August 1, 2004.

Under the direction of the ICGI, the ERPWG invited stakeholders to provide input through a variety of mechanisms. The draft Recommendations Report was made available for public comment through a Federal Register notice (Vol. 69, No. 205) on Monday, October 25, 2004 announcing the document's availability on the Interagency Committee on Government Information (ICGI) web site. The ERPWG also sent notice of the document's availability to library, archival and records management listservs, to organizations and individuals (internal and external to Government) who participated in any of the ERPWG seven targeted outreach sessions, and to organizations and individuals who had commented on the earlier ERPWG "Barriers" Report. The 30-day comment period closed November 24, 2004. This final report of recommendations reflects the input received from all these sources and deliberations of the ICGI Executive Committee.