DEPARTMENT OF THE INTERIOR
Records Management Program

Records Management Inspection Report

National Archives and Records Administration
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EXECUTIVE SUMMARY

The National Archives and Records Administration (NARA) is responsible for assisting and assessing Federal agencies on the proper management of records in all media within Federal agencies to protect rights, assure government accountability, and preserve and make available records of enduring value.[1] In this capacity, NARA inspects the records management programs of agencies to ensure compliance with the Federal Records Act and its implementing regulations and to investigate specific issues or concerns. NARA then works with agencies to make improvements to their programs based on inspection findings and recommendations.

A successful and compliant program requires senior management support at the highest levels; a clear definition of program objectives, responsibilities, and authorities; allocation of sufficient resources to administer the program; assignment of the program to an appropriate office within the agency's organizational structure; continuous training for records management staff; and regular internal evaluations to monitor compliance and program effectiveness.

A departmental records management program can be very complex due to the large size of Departments, differences between bureaus and offices, competing priorities, and limited resources. In order to successfully implement a departmental records management program, communication and coordination between the Department and its bureaus and offices are essential. Each bureau and office has its own mission and manages its records in accordance with its policies and procedures. It is the responsibility of the Departmental records management program to develop Department-wide policies, directives, standards, procedures, guidance, and strategies that enable the bureaus and offices to design and implement compliant and effective records management programs.

NARA is interested in how well Departmental records management programs operate and incorporate records management coordination into organizational business lines and culture to ensure that the Department and its bureaus and offices have effective records management programs that are in compliance with 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B. In order to understand these processes more fully, NARA examined how the Departmental Records Officer (DRO) works with the records officers (RO) of the bureaus and offices, and how Departmental business lines plan and implement standards, policies, procedures, and other aspects of a records management program.

In FY 2016, NARA inspected the records management program at the Department of the Interior (DOI). NARA conducted this effort under the authority granted by 44 United States Code (U.S.C.) 2904(c)(7) and 2906 to inspect records management programs and practices of Federal agencies. NARA initiated this inspection as part of a multi-year project to assess the strategic coordination and implementation of records management policies and practices by the DRO and the ROs within DOI's bureaus and offices.

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

In addition to being a part of the multi-year project to inspect each of the executive branch Departments, NARA was specifically interested in inspecting DOI because:

- DOI is a large, complex Department with large, semi-autonomous bureaus and offices;
- DOI has been working to establish a Department-wide central records management program which began in late 2012. NARA is aware of and interested in the coordination being done; and
- The Office of Management and Budget (OMB)/NARA *Managing Government Records Directive* (M-12-18)[2] established goals for managing email and electronic records by Federal agencies. NARA is interested in what DOI's Records Management Program (RMP) is doing to meet these goals.

KEY FINDINGS AND RECOMMENDATIONS

There are notable projects that the DOI RMP is working on to improve records management within the Department. NARA is encouraged by these developments and looks forward to supporting the DOI. The DOI RMP is working to improve overall DOI records management and to establish an enterprise-wide coordinated program.

The RMP has made considerable progress in electronic records management through its core project, eMail Enterprise Records and Document Management System (eERDMS). The eERDMS program utilizes a fully integrated DoD 5015.2-certified records management module for electronic and physical objects. The eERDMS program began prior to the release of M-12-18, yet aligns with its intent to transition to a digital Government. In particular, the DOI's initial project focus embodied the spirit of M-12-18, Goal 1.2 (to manage permanent and temporary email records in an accessible electronic format) and accomplished this goal by centralizing all inbound and outbound email in eERDMS.

While NARA applauds the efforts of the DOI eERDMS program, the DOI RMP would benefit from stronger strategic planning, risk management, comprehensive bureau and office records program evaluations, up-to-date Departmental policy, compliant RM training, and increased adoption of the current eERDMS program.

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[2] OMB/NARA *Managing Government Records Directive* (M-12-18), released August 24, 2012, https://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf.

This report makes six findings and eight recommendations (see Appendix C). Listed below is a high level summary of the findings:

- The DOI RMP lacks a formal, approved, comprehensive strategic plan that defines what the DOI RMP seeks to accomplish. The DOI RMP should formalize a Departmental strategic enterprise plan.
- There are obstacles that put the successful implementation of eERDMS at risk. The development and implementation of a risk management plan that addresses these obstacles is needed.
- Expansion of Senior Agency Official for Records Management (SAORM) support is needed to enhance the DOI RMP's efforts to improve collaboration and coordination.
- The mandatory records management training provided to all DOI staff and contractors in the annual Federal Information Systems Security Awareness (FISSA) training course is inadequate and does not meet records management training requirements under 36 CFR 1220.34(f) and OMB/NARA *Managing Government Records Directive* (M-12-18).
- The delays in updating and issuing the DOI RMP's Directive DM 380 are a risk to effective, enterprise electronic records management.
- The DOI RMP does not conduct regular, comprehensive records management evaluations.

NARA requires under 36 CFR 1239 that the DOI develop a Plan of Corrective Action (PoCA) that specifies how the agency will respond to each report recommendation, including a timeline for completion of action steps. NARA will review the proposed action steps and advise the Department on the scope and impact of its PoCA. Upon approval of the PoCA, NARA looks forward to continuing its engagement with the Department and assisting with the implementation of the recommendations.

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INTRODUCTION

The National Archives and Records Administration (NARA) is responsible for assessing Federal agencies on the proper management of records in all media to protect rights, ensure government accountability, and preserve and make available records of enduring value. In this capacity, NARA inspects the records management programs of agencies to ensure compliance with Federal statutes and regulations and to investigate specific issues or concerns. NARA then works with agencies to make improvements to their programs based on inspection findings and recommendations. NARA inspects records management programs and practices of Federal agencies under the authority granted by 44 United States Code (U.S.C.) 2904(c)(7) and 2906.

In 2015, NARA began a series of inspections of Departmental records management (RM) programs in order to evaluate how effectively these programs operate, and coordinate with bureaus and offices. Specifically, NARA has been examining how Departmental records officers (DRO) plan and implement standards, policies, procedures, and other aspects of a records management program and how they interact with the records officers (RO) of the bureaus and offices. This inspection of the records management program of the Department of the Interior (DOI), conducted in FY 2016, is the fourth in this Departmental Records Management series.

Departmental records management can be very complex. Resources are limited, and some Departments are large and have many bureaus and offices with a variety of missions and programs. To implement a Departmental records management program successfully, communication and coordination between the Department and its bureaus and offices are essential. While each bureau and office has its own mission and manages its records in accordance with its policies and procedures, it is the responsibility of the Departmental records management program to develop Department-wide policies, directives, standards, procedures, guidance, and strategies that enable the bureaus and offices to design and implement compliant and effective records management programs.

A successful and compliant program, whether at the Departmental or bureau and office level, requires senior management support at the highest levels; a clear definition of program objectives, responsibilities, and authorities; allocation of sufficient resources to administer the program; assignment of the program to an appropriate office within the agency's organizational structure; continuous training for records management staff; and regular internal evaluations to monitor compliance and program effectiveness.

BRIEF AGENCY DESCRIPTION

The U.S. Department of the Interior (DOI) is a Cabinet-level agency that manages America's vast natural and cultural heritage resources by providing policies, regulations, and guidance about the use of those resources. Additionally, the DOI honors the Nation's Trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities. The Department employs 87,000 people, including expert scientists and resource-management professionals. DOI employees, along with more than 280,000 volunteers, carry out Interior's mission from more than 2,400 operating locations.

Currently, the DOI is organized into eight offices and nine technical bureaus:[3]

- Offices
    - Office of the Secretary
    - Office of Policy, Management and Budget
    - Office of Insular Affairs (U.S. Territories and Freely Associated States)
    - Office of the Solicitor
    - Office of the Inspector General
    - Office of the Chief Information Officer
    - Office of the Special Trustee for American Indians
    - Office of Subsistence Management
- Technical Bureaus
    - Bureau of Indian Affairs
    - Bureau of Land Management
    - Bureau of Ocean Energy Management
    - Bureau of Reclamation
    - Bureau of Safety and Environmental Enforcement
    - National Park Service
    - Office of Surface Mining Reclamation and Enforcement
    - U.S. Fish and Wildlife Service
    - U.S. Geological Survey

INSPECTION OBJECTIVE

The objective of this inspection was to determine how well standards, policies, procedures, and other records management coordination practices at the DOI Department level are implemented to ensure that the Department and its bureaus and offices have effective records management programs and are in compliance with 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B. Additionally, during the course of the inspection, NARA sought to identify best practices and lessons learned related to the development and implementation of records management policies and practices throughout the Department.

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[3] Department of the Interior, https://www.doi.gov, accessed June 22, 2016.

SCOPE AND PURPOSE

The purpose of this inspection was to examine how the DOI RM Program (RMP) and bureau and office RM programs communicate and cooperate in order to develop and implement effective records management across the Department. This inspection focused specifically on RM standards, policies, procedures, and practices at the Department level and their impact on bureaus and offices. It also examined the controls the Department has implemented to mitigate risks associated with non-compliant handling of records and information.

METHODOLOGY

This inspection consisted of site visits and teleconferences with the DOI Departmental RM staff as well as with records officers and records liaisons from DOI offices and bureaus in Washington, DC, and Denver, Colorado. Included in these meetings were:

- Bureau of Indian Affairs
- Bureau of Land Management
- Bureau of Safety and Environmental Enforcement
- Bureau of Ocean Energy Management
- National Park Service
- Office of Surface Mining Reclamation and Enforcement
- U.S. Fish and Wildlife Service
- U.S. Geological Survey
- Office of the Secretary
- Bureau of Reclamation
- Office of the Special Trustee for American Indians
- Office of Natural Resources Revenue

The inspection team members also conducted the following activities:

- Reviewed records management policies, directives, and other documentation provided by DOI (see Appendix A);
- Used a detailed checklist based on Federal statutes and regulations as well as NARA guidance to guide the course of the inspection (see Appendix E); and
- Reviewed DOI's responses to the annual Records Management Self-Assessment (RMSA) from 2012 to 2015 and DOI's Senior Agency Official for Records Management (SAORM) Report from 2013 to 2015.

STATUTES AND REGULATIONS

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

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

- The adequate and proper documentation of agency activities (44 U.S.C. 3101);
- A program of management to ensure effective controls over the creation, maintenance, and use of records in the conduct of their current business (44 U.S.C. 3102(1)); and
- Compliance with NARA guidance and regulations, and compliance with other sections of the Federal Records Act that give NARA authority to promulgate guidance, regulations, and records disposition authority to Federal agencies (44 U.S.C. 3102(2) and (3)).

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

STRUCTURE OF THE REPORT

In accordance with 36 CFR 1239 this report contains:

(1) An executive summary;
(2) Background and purpose of the inspection;
(3) Inspection methodology, including offices visited;
(4) Findings;
(5) Corrective actions needed and other recommendations; and
(6) Any necessary appendices, such as summaries of each site visit or the inspection instrument.

DESCRIPTION OF THE DOI RECORDS MANAGEMENT PROGRAM (RMP)

Organizationally, the DOI RMP is located in the Office of the Chief Information Officer (OCIO). The DOI RMP staff supports an agency-wide RM program and provides guidance for the RM programs of the bureaus and offices nationwide.

The DOI RMP, directed by the DRO, has been working to establish a Department-wide, coordinated, and cohesive RM program. The program consists of the following two management groups:

- The Records Management Task Force (RMTF) is made up of a portion of the Department's bureau ROs. The membership rotates so each bureau has an opportunity to serve on the RMTF. The RMTF develops the policies, procedures and guidance adopted in the Department. For instance, the DOI RMTF is drafting guidance in support of email auto-categorization through the issuance of Standard Operating Principles and Procedures (SOPP).

- The Records Management Working Group (RMWG) is made up of all the bureau ROs and serves to review and provide comment and approval on the RMTF work products. The SOPPs are drafted and updated by the RMTF, approved by the RMWG, and distributed by the DRO.

RM for the Department and its bureaus and offices is guided by the DOI Departmental Manual DM 380, the Departmental Records Schedules (DRS), numerous SOPPs, and supporting memorandums and directives. A revised DM 380 is currently with the DOI Office of the Secretariat for review and signature.

The DOI RMP oversees the management and disposition of Department records through the use of the DRS. The DRS crosswalks all of the Department's bureaus and offices to existing NARA-approved records schedules and groups those schedules according to Federal Lines of Business, which provide a common framework of functions across the Federal Government. The DRS further simplifies the retention periods to allow for more efficient, streamlined records disposition. As of this writing, the Administrative and Policy DRSs have been approved by the Archivist of the United States, while other schedules are still under development.

The SOPP documents outline minimum operational procedures for the DOI RMP's eMail Enterprise Records and Document Management System (eERDMS) and establish the foundation for the DOI RMP. The SOPPs consist of a master document and subdocuments supporting every eERDMS component system.

Finally, the DOI RMP has been coordinating the effort to develop a digital center of excellence at the Office of the Special Trustee (OST) for American Indians within the American Indian Records Repository (AIRR)[4] located in Lenexa, Kansas. This program has been in development and testing for two years and will create one of the largest online digital repositories of Federal records, containing approximately 1.2 billion records.

HIGHLIGHTS OF THE DEPARTMENTAL RM PROGRAM

There are notable projects that the DOI RMP is working on to improve records management. NARA is encouraged by these developments and looks forward to supporting the DOI in these ongoing activities.

eERDMS and Enterprise Content Management (ECM)

In early 2002, the Department was involved in a litigation case that resulted in the ongoing capture of all inbound and outbound email for approximately 40% of the Department. The captured repository was referred to as Zantaz, which was the software vendor name for managing some of the DOI email. Zantaz did not cover the entire Department; it only supported designated Trust Bureaus in compliance with the Cobell litigation[5]. The Zantaz repository continued until replaced by the eERDMS. The eERDMS was implemented Department-wide for the same fiscal investment for managing email and also expanded advanced software capabilities for managing electronic records that included enterprise eDiscovery, content, document, mobile and auditing management.

Beyond the Zantaz replacement project, getting the stakeholders, especially the end-users, to recognize the value and leverage the full capability of eERDMS has been challenging. The Bureau of Reclamation (BOR) is in the early adoption phase of eERDMS, piloting the migration of their legacy records and data solutions to potentially support an enterprise-wide bureau records program. The remaining DOI bureaus and offices are still in the early stages of analysis and deciding how eERDMS can meet their needs. It is not the Department's initial strategy to force or direct bureaus and offices to implement eERDMS. It should also be noted that the DOI is working to migrate and integrate into eERDMS the DOI Federal Docket Management System, the Federal Business Management System, and various other systems deemed mission critical to the management of DOI's records.

The DoD 5015.2-compliant system supports both electronic and physical records. DOI envisions a single integrated solution that will be used Department-wide to manage email, electronic records, and forms. In addition, it is proposed that the system will eventually consolidate numerous legacy records systems into one platform. One of the primary goals of the eERDMS is to standardize the Departmental RMP, to improve responsiveness to Freedom of Information Act (FOIA) requests, support eDiscovery, and provide the ability to apply legal holds to records.

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[4] AIRR contains retired records from the Bureau of Indian Affairs and the Office of the Special Trustee for American Indians, https://www.doi.gov/ost/records_mgmt/records.
[5] Information about the Cobell litigation can be found at https://www.doi.gov/ocl/cobell-vs-norton.

Phase 1 of the overall eERDMS program was completed in 45 days from award on June 23, 2012, which included the full migration of all legacy journal routes to eERDMS. This phase, however, was not officially accepted until January 23, 2013, when all bureau email connections were migrated. This phase, although prior to M-12-18, accomplished the objectives of M-12-18, Goal 1.2, to manage all email in an accessible electronic format.

Phase 2 consisted of the migration of 1.2 billion legacy Zantaz related emails to eERDMS, and includes the:

- initial coordinated roll out of the newly centralized DRS;
- creation of document exemplars for an auto-classification system; and
- incorporation of legacy systems into eERDMS with full implementation and maintenance of the system expected by the end of FY 2019.

eERDMS is not only a technology based approach but is comprised of services that include social media capture, email management, shredding, digitization, migration, and support staff services. Because of the scope and approach of eERDMS, NARA is interested in evaluating its methodology and results.

Email Management Strategy

A major focus of the Department's electronic records management (ERM) efforts has been on email management. The DOI has developed a consolidated big-bucket records retention schedule (DRS) and is leveraging auto-classification to automatically classify electronic content beginning with email. The Department journals over 70 million emails a month at a 6% increase from 2015. Because they are leveraging auto-classification within the DRS, the Department has opted out of using Capstone, which is an account based email management approach created by NARA[6].

Federal Information Technology Acquisition Reform Act (FITARA)

The Federal Information Technology Acquisition Reform Act (FITARA) was enacted on December 19, 2014, with the goal of eliminating duplication and waste in information technology (IT) acquisition for the Federal Government.[7] Although the eERDMS program was initiated prior to FITARA, the DOI RMP is now utilizing FITARA to leverage support for centralization of electronic records management and eERDMS. On June 15, 2015, OMB issued *Management and Oversight of Federal Information Technology* (M-15-14)[8], which provided guidance for the enactment of FITARA. The issuance of OMB M-15-14 supported DOI Secretarial Order 3309, issued in 2010. DOI Secretarial Order 3309 provided the following

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[6] NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records, https://www.archives.gov/records-mgmt/bulletins/2013/2013-02.html.
[7] The Federal Information Technology Acquisition Reform Act, https://www.ocio.usda.gov/federal-information-technology-acquisition-reform-act.
[8] *Management and Oversight of Federal Information Technology* (M-15-14), https://www.whitehouse.gov/sites/default/files/omb/memoranda/2015/m-15-14.pdf.

policy instruction: "The CIO will assume oversight, management, ownership, and control of all Departmental IT Infrastructure assets including, without limitation, externally hosted or managed IT services and the delivery of managed services for the use and benefit of the Department, its bureaus, offices, and other authorized beneficiaries or the equivalent thereof." Although this requirement is not directly related to managing Federal records, the DOI utilized both DOI Secretarial Order 3309 and OMB M-15-14 to consolidate their approach to managing records by centralizing the funding and controls for RM IT solutions and RM requirements at the Department level. This centralization has enabled DOI to encourage bureaus and offices to adopt eERDMS.

Departmental Records Management Directive (DM 380)

Updated versions of the Departmental records management manual are being prepared by the DRO with the Departmental RMWG and RMTF. The manual includes approved overarching policies on records management topics from records schedules to vital records for all of DOI. To date, six updates to the Departmental manual have been internally approved. Work on other updates in the areas of records losses and the political exit process continues. When fully completed, the manual will provide an updated Departmental compliance framework with NARA regulations.

Department-Wide Standard Operating Principles and Procedures (SOPP)

The DRO has created the RMWG and associated RMTF made up of bureau and office ROs to implement SOPPs. The DRO has worked closely with the bureaus and offices to develop SOPPs that have been implemented across the Department. Considered a key element of eERDMS, this program has developed a set of SOPPs that guide Department activities at a high level as well as provide requirements to operate the eERDMS system. To date, the task force has gained internal approval from the Office of the Secretary-Chief Information Officer for six procedural documents relating to the operation of eERDMS. These documents provide the basis for the promulgation, operation, and oversight of the system. The SOPPs outline sound records management principles and procedures, which has helped gain buy-in across the Department.

Departmental Records Schedules (DRS)

The inspection team was impressed with the scope and vision of the DOI RMP in the creation of the DRS. Started in 2012 as a collaborative project among the DOI bureaus and offices, the DRS incorporated principles from the Federal Enterprise Architecture Reference Models. Once completed, it will have consolidated over 200 schedules with 2,300 retention instructions from nine bureaus and numerous offices into eight comprehensive schedules. These schedules will align like series and dispositions across DOI bureaus and offices. DOI has received approval from the Archivist of the United States for the Administrative and Policy schedules. DOI has proposed retentions for Legal and five Mission draft schedules, which cover areas such as natural and cultural resources, energy and natural resources, and scientific records, and are currently in varying stages of completion and review. This project forms the backbone of the RMP and has

introduced a level of collaboration among DOI bureaus and offices that had previously not existed.

FINDINGS AND RECOMMENDATIONS

The DOI RMP is compliant with records management statues and regulations under 36 CFR Chapter XII Subchapter B. However, the inspection team identified areas of risk that could impact the DOI RMP, particularly the eERDMS program, and could make the DOI RMP non-compliant with records management statutes and regulations in the future.

RISK MANAGEMENT

Risk assessment and risk mitigation, along with other techniques, are used to establish both management controls for, and documentation of, requirements for agency activities. The emphasis on risk assessment relates to OMB's revised Circular A-123 (2016)[9] as well as to Clinger-Cohen Act[10] requirements for incorporation of risk management into program activities, particularly for those that are dependent upon IT (e.g., eERDMS). The system concept development phase of the Systems Development Life Cycle (SDLC) includes the requirement for a risk management plan that identifies the risks to the agency associated with the investment.[11] Typically, agencies conduct risk assessments to establish appropriate levels of management controls prior to undertaking new program initiatives. These risk assessments can also be used to establish records management controls. Agency records management practices are based on operational needs and perceptions of risks. Operational needs (e.g., compliant life-cycle management of record email messages and documents) determine the way agencies address the trustworthiness of Electronic Records Management Systems (ERMS).

Risk management is defined as an on-going process that begins with initial risk identification and continues throughout a project's lifecycle. Risk management is the proactive identification of potential issues before they occur. This proactive identification allows for timely avoidance or mitigation of risks. Risk management also involves revalidation during planning and implementation and calls for an active risk management approach to monitor, mitigate, and control risks. Finally, it is important to identify the consequence, severity, and probability of specific risk factors and suggest mitigation measures.

During the course of the inspection, NARA noted and observed a number of apparent risks associated with the development of the coordinated Department-wide RM Program, including the eERDMS implementation.

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[9] Revisions to OMB Circular A-123, Management's Responsibility for Internal Control, https://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a123/a123_rev.pdf.
[10] Clinger-Cohen Act of 1996 (Information Technology Management Reform Act), Public Law 104-106, https://www.gpo.gov/fdsys/pkg/USCODE-2011-title40/pdf/USCODE-2011-title40-subtitleIII.pdf.
[11] NARA Guidance on Managing Web Records, http://www.archives.gov/records-mgmt/policy/managing-web-records.html.

Finding 1: The DOI RMP lacks a formal, approved, comprehensive strategic plan that clearly defines what the DOI RMP seeks to accomplish.

The RMP is supported through various communication methods (i.e., meetings, standard operating procedures, templates, guides). As a result, the Department has utilized a tactical approach through verbal and visual presentations to promote the adoption of the eERDMS program. This does not constitute a formalized strategic plan. However, the Departmental RMP does contain a well-defined charter, task force, working group, updated draft Departmental Manual DM 380 and various technical groups to support day-to-day operations. Typically, a Department will have a specific RM program strategic plan, which identifies clear direction through enterprise policy, planning, and guidance. This direction substantiates the RM program. Usually, this is in alignment with the Departmental strategic plan and mission objectives. A formal DOI RMP strategic plan would strengthen the ability of the RM programs of DOI bureaus and offices to prioritize goals and objectives. Once finalized, this strategic plan would establish the DOI RMP as an enterprise program, provide the framework for managing risk, and create a clear path of adoption for eERDMS.

The DOI RMP senior staff expressed the desire to create an enterprise approach for the RMP. The effective implementation of a strategic plan to firmly establish the enterprise approach of the DOI RMP requires cooperation and coordination between the OCIO, the DRO, and the bureaus and offices. In turn, this coalition would help identify and leverage the abilities and skills of the bureaus' and offices' RM staff, and enhance the DOI RMP efforts to achieve the strategic plan goals.

Recommendation 1: The DOI RMP should develop and implement a Departmental strategic plan in order to strengthen the records management program.

Finding 2: Challenges related to collaboration and adoption put the successful implementation of eERDMS at risk.

The success of the eERDMS program is dependent on collaboration and engagement from the bureaus and offices which was not fully evident from our inspection.

The Department has made significant strides and accomplished much in three years. The DOI RMP centralized groups of records officers and their liaisons coupled with a task force, working group, and cohort groups to specifically design and build a coalition.

Although the Department's coalition was instrumental in the initial success of the eERDMS program, one of the most significant challenges facing the successful implementation of eERDMS has been early adoption progress within the bureaus and offices. Even though eERDMS is intended to provide the ROs of the bureaus and offices with more control of their records by providing standardized tools and processes, some bureaus and offices are resisting the process. The Department should consider additional approaches for bureaus and offices to improve the collaboration and adoption of eERDMS. As an example, one approach that is already being successfully implemented is the Bureau of Land Management's (BLM) Records

Management Board (RMB). The Board was created in 2015 for the purpose of providing guidance and approval of records disposition activities, records management policy development, and collaboration. It is comprised of a minimum of three State or Center Records Administrators, Records Managers, and/or experienced records professionals. All activities are communicated and collaborated through an intranet RMB portal. This has created an environment where staff can easily communicate, locate work products, collaborate, and support offices and user adoption. Using the BLM RMB Model, the DOI SAORM should consider establishing a Department RM Board to govern the work of the DOI RMP, which will strengthen adoption of eERDMS.

The following obstacles were identified by the inspection team as areas of risk that could impact the success of eERDMS:

- **Delays in the development and submission of the DRS.** While the scope of the DRS is impressive, there has been significant slippage in the Departmental plan to complete the Mission records schedules. The Department developed four main buckets of records (Administrative, Legal, Mission, and Policy). The Legal schedule was withdrawn from the appraisal process in September 2015 due to concerns regarding Office of Special Trust records retention schedules. DOI has addressed these concerns and is ready to re-submit to NARA. Coordination of the Mission schedules among the bureaus and offices has been more difficult than anticipated, as well. Two bureaus expressed reservations about the ability of the DRS to meet the records retention requirements. In addition, a NARA appraisal review for items within the schedules has slowed down the coordination within the bureaus. These issues are being addressed, but given that the approval of the DRS is a vital component to the successful implementation of eERDMS, DOI must make the completion of the DRS a Departmental mission objective.

- **Time and staff commitments**. Smaller bureaus expressed concern over the amount of work the program required. For instance, the collection of document exemplars for input into eERDMS once a schedule has been approved, and the creation of crosswalks for superseded schedule items, are labor intensive exercises for which the records officers or liaisons are responsible. This is in addition to regularly assigned duties. Although the majority of bureaus were of the opinion that the DRS and the work being done on eERDMS was beneficial to DOI as a whole, there were concerns about the ability of small bureau staffs to populate and maintain the system over time. The Department should work to mandate the development and management of the various DRS schedules within the eERDMS technology throughout each bureau and office and establish permanent duties to support this initiative.

- **DOI has not fully addressed the following in its project considerations:**

  - Operations and maintenance knowledge and skills required for records officers and staff to ensure the success of eERDMS;
  - Bureau and office technical support for the system;
  - Staff resource needs to input and maintain baseline information in eERDMS; and
  - Provisioning of staffing and succession planning in the event that key Department, bureau, office, and/or contractor personnel depart the eERDMS program.

Recommendation 2.1: Develop and implement a risk management plan that addresses how each of the items listed in Finding 2 can be mitigated as the eERDMS program continues, including initiating appropriate risk control measures.

Recommendation 2.2: Conduct a gaps analysis to determine the knowledge and skills required of staff to successfully implement, operate, and maintain eERDMS, and develop a professional development plan based on the results.

COMMUNICATION AND COORDINATION

Finding 3: Expansion of SAORM support is needed to enhance the DOI RMP's efforts to improve collaboration and coordination.

The Department Chief Information Officer (CIO) is the SAORM, which fulfils NARA's requirement that the SAORM serve at the Assistant Secretary level. The Department's SAORM is committed to supporting RM efforts and encouraging senior management to provide similar support. With executive level support from the Department SAORM and senior management, the DOI RMP has the visibility and support to develop an effective RMP ensuring the management and preservation of DOI's records and information. The inspection team discussed with the RM staff of the bureaus and offices the value of appointing SAORMs at the executive level of each bureau and office. There were varying levels of interest.

There is an opportunity to improve the coordination of the DOI RMP by expanding the reach of the SAORM. Expanding SAORM support would greatly enhance the DOI RMP's efforts to increase solidarity across the Department's RM community and improve collaboration and coordination among the disparate RM programs. The DRO, in collaboration with RM staff across all of DOI, should consider identifying opportunities for the SAORM to engage RM leadership throughout the Department. Enhancing SAORM support would assist the Department with increasing and improving lines of communication and in developing cooperative projects. This, in turn, would also help to achieve a more cohesive Department-wide RM program. Good communication and coordination are essential for all RM stakeholders to function in an effective and collaborative manner.

The SAORM should lead the implementation of an enterprise DOI RMP strategic plan (see Finding 1) that leverages the DOI strategic plan. DOI should engage executive level sponsors for RM at the bureau and office level in development and implementation of the DOI RMP strategic plan. This collaboration would improve cooperation and coordination between the OCIO, the SAORM, the DRO, and the bureaus and offices. In turn, this would help identify and leverage the abilities and skills of the RM staff in the bureaus and offices, and would enhance the Departmental RMP efforts to achieve the goals in the Departmental strategic plan.

Recommendation 3.1: The Department should appoint executive level sponsors at the bureau and office level to improve strategic coordination of RM throughout the Department.

Recommendation 3.2: The Department SAORM and DRO should engage directly with the DOI bureau and office RM programs' executive level sponsors to improve the DOI RMP.

RECORDS MANAGEMENT TRAINING

Finding 4: The mandatory RM training provided to all DOI staff and contractors in the annual Federal Information Systems Security Awareness (FISSA) training course is inadequate and does not meet RM training requirements under 36 CFR 1220.34(f) and OMB/NARA *Managing Government Records Directive* (M-12-18, Part 1, item 2.4).

36 CFR 1220.34(f) and M-12-18, Part 1, item 2.4, require agencies to provide guidance and training to all personnel on their RM responsibilities. With the added responsibilities for creating and managing electronic records and email, it is increasingly important for agencies to have RM training programs. As creators and managers of the records that document the agency's mission and accomplishments, the RM staff and all employees should have the necessary training to safeguard those records and to ensure compliance with RM statutes and regulations as well as agency policies, procedures, and guidance.

The Department does provide limited RM training through the annual FISSA training course, which is mandatory for all DOI staff. The DRO is planning and designing updated mandatory training. To improve RM throughout their own programs, most bureaus and offices have also developed and conducted their own RM training, but it is often informal and not mandatory for all staff. During our site visits, staff indicated a need for more internal RM training. According to the 2015 Organizational Assessment created by the Department, Metric 4a "addresses the need for unique training within the bureau for mission-unique records training." However, the Department did not require this training for all staff. As a result, there is an opportunity for the Departmental, bureau and office RM programs to collaborate and champion the adoption of mandatory bureau/mission-specific RM training. One form this could take is that of a 'tiered' approach where the required training is based on how much the employee is involved with records management and at what level. This would meet the requirement that all staff receive RM training, and yet provide only the information pertinent to each individual to do their job.

Recommendation 4: The Departmental RMP must collaborate with the RM programs of the bureaus and offices to develop and implement mandatory RM training for all staff (including bureau or mission-specific training), with emphasis on email and electronic records management as well as the protection of records. (36 CFR 1220.34(f) and M-12-18, Part 1 item 2.4)

POLICIES FOR MANAGING ELECTRONIC RECORDS

Finding 5: The delays in updating and issuing the DOI RMP's Directive DM 380 are a risk to effective, enterprise electronic records management.

In today's records and information environment, it is essential to have policies and guidance that address the management of email and other electronic records. Records management at the DOI is guided by Departmental Manual DM 380 and initial SOPPs for eERDMS. The SOPPs for eERDMS will continue to be updated and issued throughout the design and implementation of the project. DM 380, however, requires updating and reissuance to provide policy and guidance on the eERDMS program and the management of electronic records. Although six updates to the Departmental manual have been internally approved, the rest have not. It is critical that Departmental RM guidance reflect the most current requirements on managing electronic records. Completion of this work and reissuance of the policy is essential to creating effective, enterprise electronic records management.

Recommendation 5: The DOI RMP must update and reissue DM 380 to include guidance on managing electronic records and information, including email. (36 CFR 1220.34, 36 CFR 1236.22)

DOI PERIODIC ASSESSMENTS AND EVALUATIONS

Finding 6: The DOI RMP does not conduct regular, comprehensive RM evaluations.

36 CFR 1220.34(j) requires agencies to conduct formal evaluations to measure the effectiveness of RM programs and practices. The evaluation process is an area where coordination and cooperation between the DOI RMP and the RM programs of the bureaus and offices should be enhanced.

The Department has conducted limited scope organizational assessments of its bureaus and offices for several years. These assessments scored bureau and office ROs on their participation in Departmental strategic initiatives as part of their performance evaluation. While these current methods of assessment are of great value, the DRO should use the assessments to provide a yearly review to the CIO and the SAORM of the progress the bureaus and offices have made towards the strategic goals defined at the Departmental level. This report should provide an assessment of successes and roadblocks to the implementation of Departmental strategic goals and compliance with Federal RM regulations. In addition, the assessments should allow the component ROs to clearly identify problems and difficulties they encounter in the fulfillment of

their metrics. Bureau and office ROs are also encouraged to make an honest assessment of their strengths and weaknesses when completing the RMSA.

As they are currently implemented, these initial assessments provide limited compliance with 36 CFR 1220.34(j). The DOI should further expand this effort to include a more comprehensive evaluation with site visits. Conducting periodic site visits and evaluations by the DRO and ROs provide verification of how well various offices are complying with records schedules and other aspects of records management. They provide opportunities to identify areas that need improvement and areas that are working well and could serve as models to other parts of the program. Finally, conducting evaluations and site visits help measure the effectiveness of RM practices within the agency and ensure compliance with NARA regulations.

Recommendation 6: The Department and the bureau and office RM programs must establish comprehensive and regular RM evaluations to ensure all DOI records are managed in accordance with 36 CFR Chapter XII, Subchapter B.

CONCLUSION

Maintaining an effective Department-wide RM program is very complex and requires senior management support; strategic planning with goals, objectives, and performance measures; assessing adequate and appropriate staffing and funding; and a great deal of coordination. The Department has expressed a strong desire to continually enhance and improve its program. The Department's SAORM is committed to supporting RM efforts and encouraging senior management to provide similar support. NARA fully endorses these goals and lends its support through the findings and recommendations in this report.

We recognize the great strides the DOI RMP has made up to this point. Since 2012, considerable progress has been made towards managing electronic records through eERDMS and its associated bureaus and offices. NARA has recognized these achievements and hopes to continue to do so as the Department moves forward with its plans.

While the DOI RMP and the bureau and office RM programs are making efforts to improve the overall DOI RMP, this report identifies specific actions that are essential to achieving the successful and efficient Departmental RM Program that DOI is working towards, including:

- Formalizing a Departmental strategic enterprise plan in order to strengthen the RM program;
- Developing and implementing a risk management plan that addresses how each of the items listed in Finding 2 can be mitigated as the eERDMS program continues, including initiating appropriate risk control measures;
- Strengthening lines of communication and coordination among Departmental and bureau and office RM programs, with support from the SAORM, Bureau Associate CIOs and other senior level management;

- Developing and implementing mandatory RM training for all RM staff, employees, and contractors;
- Updating and reissuing the Departmental Manual DM 380; and
- Establishing a comprehensive internal RM evaluation program for all bureaus and offices.

Implementing the recommendations in this report, along with support from the Department SAORM and senior management throughout the DOI, will strengthen the DOI RMP and bureau and office RM programs, help the Department to achieve its mission, and ensure the effective management and preservation of the Department's records and information.

APPENDIX A
RELEVANT PRE-INSPECTION DOCUMENTS

DOI Strategic Plan for Fiscal Years 2014 - 2018

DOI Information Resources Management (IRM) Strategic Plan, 29 May 2015

DM 380 Departmental Manual, Records Management - Version 21, 20 Feb 2015

DOI Standard Operating Principles and Procedures

OMB Management and Oversight of Federal Information Technology (M-15-14), June 2015

Information Technology Management Functions and Establishment of Funding Authorities (Secretarial Order 3309), Dec 2010

Departmental Records Schedules

FY 2015 Organizational Assessments

DOI Records Officers Meeting Agendas 2014 - 2015

eERDMS Training Products and Guidance

Federal Information Systems Security Awareness (FISSA) + Privacy and Records Management Course, 2015

DOI Records Management Self-Assessments 2012 - 2015

DOI Senior Agency Official for Records Management Annual Reports 2013 - 2015

APPENDIX B
AUTHORITIES AND FOLLOW-UP ACTIONS

AUTHORITIES

- 44 U.S.C. Chapter 29

- 36 CFR Chapter XII, Subchapter B

- 36 CFR 1239, Program Assistance and Inspections

OTHER GUIDANCE

- OMB/NARA *Managing Government Records Directive* (M-12-18)

- OMB/NARA *Guidance on Managing Email* (M-14-16)

- Other NARA Bulletins currently in effect

FOLLOW-UP ACTIONS

- ACTION PLAN

  The Department of the Interior will submit to NARA a Plan of Corrective Action (PoCA) that specifies how the agency will address each inspection report recommendation, including a timeline for completion and proposed progress reporting dates.

  The plan must be submitted within 60 days after the date of transmittal of the final report to the head of the agency.

- PROGRESS REPORTS

  The Department of the Interior will submit to NARA progress reports on the implementation of the action plan until all actions are completed.

- NARA REVIEW

  NARA will analyze the adequacy of the DOI's action plan, provide comments to the DOI on the plan within 60 calendar days of receipt, assist the DOI in implementing recommendations, and inform the DOI when progress reports are no longer needed.

APPENDIX C
COMPLETE LIST OF FINDINGS AND RECOMMENDATIONS

Finding 1: The DOI RMP lacks a formal, approved, comprehensive strategic plan that clearly defines what the DOI RMP seeks to accomplish.

Recommendation 1: The DOI RMP should develop and implement a Departmental strategic plan in order to strengthen the records management program.

Finding 2: Challenges related to collaboration and adoption put the successful implementation of eERDMS at risk.

Recommendation 2.1: Develop and implement a risk management plan that addresses how each of the items listed in Finding 2 can be mitigated as the eERDMS program continues, including initiating appropriate risk control measures.

Recommendation 2.2: Conduct a gaps analysis to determine the knowledge and skills required of staff to successfully implement, operate, and maintain eERDMS, and develop a professional development plan based on the results.

Finding 3: Expansion of SAORM support is needed to enhance the DOI RMP's efforts to improve collaboration and coordination.

Recommendation 3.1: The Department should appoint executive level sponsors at the bureau and office level to improve strategic coordination of RM throughout the Department.

Recommendation 3.2: The Department SAORM and DRO should engage directly with the DOI bureau and office RM programs' executive level sponsors to improve the DOI RMP.

Finding 4: The mandatory RM training provided to all DOI staff and contractors in the annual Federal Information Systems Security Awareness (FISSA) training course is inadequate and does not meet RM training requirements under 36 CFR 1220.34(f) and OMB/NARA *Managing Government Records Directive* (M-12-18).

Recommendation 4: The Departmental RMP must collaborate with the RM programs of the bureaus and offices to develop and implement mandatory RM training for all staff (including bureau or mission-specific training), with emphasis on email and electronic records management as well as the protection of records. (36 CFR 1220.34(f) and M-12-18)

Finding 5: The delays in updating and issuing the DOI RMP's Directive DM 380 are a risk to effective, enterprise electronic records management.

> Recommendation 5: The DOI RMP must update and reissue DM 380 to include guidance on managing electronic records and information, including email. (36 CFR 1220.34, 36 CFR 1236.22)

Finding 6: The DOI RMP does not conduct regular, comprehensive RM evaluations.

> Recommendation 6: The Department and the bureau and office RM programs must establish comprehensive and regular RM evaluations to ensure all DOI records are managed in accordance with 36 CFR Chapter XII, Subchapter B.

APPENDIX D
OFFICES VISITED/INTERVIEWED DURING INSPECTION

Department of the Interior Headquarters, Washington, DC, January 23 - 25, 2016
- Office of the Chief Information Officer/Departmental Offices
- Office of the Secretary
- Bureau of Safety and Environmental Enforcement
- Bureau of Ocean Energy Management
- U.S. Fish and Wildlife Service
- National Park Service
- Bureau of Land Management
- Bureau of Indian Affairs
- U.S. Geological Survey
- Office of Surface Mining Reclamation and Enforcement

DOI Headquarters/Regional Offices, Denver, Colorado, March 15 - 17, 2016
- Bureau of Reclamation
- U.S. Geological Survey, Southwest Region
- U.S. Geological Survey, National Water Laboratory
- Office of Natural Resources Revenue
- Office of the Special Trustee for American Indians
- Office of Surface Mining Reclamation and Enforcement, Western Region
- U.S. Fish and Wildlife Service, Region 6
- Bureau of Land Management, Colorado State Office

National Park Service, Washington, DC, Teleconference, April 25, 2016

APPENDIX E
SELECTED COMPLIANCE QUESTIONS

Specific Questions/Areas Addressed:

- Responsibility and governance as they relate to the implementation and oversight of the department's RM program

- Dissemination of records management directives and other issuances

- Records management knowledge and experience of RM staff and training provided to RM staff, agency employees, and contractors

- Assignment of records management responsibilities to program and administrative units

- Coordination of RM program activities among the departmental components and communication of RM requirements to and within departmental bureaus and offices

- Senior management support ensuring adequate resources (time, budget) for their RM staff and other business line staff to administer the program and to pursue training, professional development, and continuing education opportunities

- The RM program ensures that recordkeeping requirements are embedded into business functions providing adequate documentation of the agency's activities

- The RM program has oversight ensuring that the agency has effective controls in place to manage records created by staff and contractors and to manage records created and shared in multi-agency environments

- Records scheduling is coordinated among the department bureaus and offices including developing and monitoring the implementation of records schedules and the dissemination of records schedules changes and the challenges of managing records under multiple litigation freeze orders including applying and lifting freezes appropriately

- Records disposition is coordinated among department bureaus and offices including the transfer of inactive records to storage, the transfer of eligible permanent records to NARA, tracking of all records dispositions and the impact of multiple litigation freeze orders

- Electronic records management objectives, responsibilities, authorities and guidance are incorporated in pertinent agency directives, disseminated to department bureaus and offices, and monitored for compliance

- Electronic records migration strategies are designed and implemented by the department, bureaus and offices to ensure electronic records are maintained to meet business purposes and to comply with NARA-approved retention schedules and including email management

- Risk management including identifying, analyzing, and assessing risks to the integrity, authenticity, reliability, usability, and preservation of its records and information

- The RM program has a coordinated program of evaluations/inspections/audits, conducted on an annual cycle or similar, to ensure the records management program is efficient, effective, and compliant

- The RM program conducts and coordinates RM training to ensure that those individuals with responsibility for records management have adequate training and professional development consistent with their responsibilities

- Records Management Self-Assessment

- Strategic planning for information resources management, particularly involving electronic systems development

- Email systems and the management and preservation of records

- Strategic plans and implementation of the goals and tasks of OMB/NARA *Managing Government Records Directive* (M-12-18) goals and OMB/NARA *Guidance on Managing Email* (M-14-16)

APPENDIX F
ACRONYMS AND ABBREVIATIONS

AIRR   American Indian Records Repository

BLM   Bureau of Land Management

BOR   Bureau of Reclamation

BRMP   Bureau Records Management Plan

CFR   Code of Federal Regulations

CIO   Chief Information Officer

DM   Departmental Manual

DOI   Department of the Interior

DRO   Departmental Records Officer

DRS   Departmental Records Schedules

ECM   Enterprise Content Management

eERDMS   eMail, Enterprise Records and Document Management System

ERM   Electronic Records Management

ERMS   Electronic Records Management System

FISSA   Federal Information Systems Security Awareness

FITARA   Federal Information Technology Acquisition Reform Act

FOIA   Freedom of Information Act

GAfG   Google Applications for Government

IRM   Information Resources Management

IT   Information Technology

NARA   National Archives and Records Administration

OCIO   Office of the Chief Information Officer

OMB   Office of Management and Budget

OST   Office of the Special Trustee for American Indians

PoCA   Plan of Corrective Action

RM   Records Management

RMB   Records Management Board

RMP   Records Management Program

RMSA   Records Management Self-Assessment

RMTF   Records Management Task Force

RMWG   Records Management Working Group

RO   Records Officer

SAORM   Senior Agency Official for Records Management

SDLC   Systems Development Life Cycle

SOPP   Standard Operating Principles and Procedures

U.S.C.   United States Code