The National Archives and Records Administration (NARA) requires Senior Agency Officials for Records Management (SAORM) to provide an annual report demonstrating how agencies are handling important records management initiatives as identified by NARA.

NARA uses the reports to determine the overall progress of the Federal Government in managing its records and the transition away from paper to digital formats and to identify best practices and model solutions within Federal agencies.

The reporting period begins on <u>March 11, 2019</u> with reports due back to NARA no later than <u>April 19, 2019</u>.

NARA plans to post your 2018 SAORM report on the NARA website upon receipt. Please ensure that your agency's report is a publicly releasable version. This action is in the interest of transparency in Government and to promote collaboration and communication among agencies. NARA intends to list any non-responding agencies in a summary report and on the website.

Instructions for Reporting

- This template covers progress through December 31, 2018.
- Please be brief and precise in your answers. Limit answers to each question to no more than 500 words.
- Please complete the questions/items below and send the report to rmselfassessment@nara.gov. Include the words "SAORM annual report - [Agency Name] in the subject line of the email.
- If you are responsible for records management in multiple agencies, components, or bureaus, please determine how you will submit reports to NARA. While NARA prefers a comprehensive report, you may submit separate reports for each component.

Provide the following information (required):
- Name of SAORM: Michael H. Allen

- Position title: Deputy Assistant Attorney General for Policy, Management and Planning, Justice Management Division, United States Department of Justice

- Address: U.S. Department of Justice
             950 Pennsylvania Avenue, NW, Suite 1111
             Washington, DC 20530-0001

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.**

   Please provide list:

   - Offices, Boards, and Divisions as defined in 28 CFR § 0.1 *et seq.*
   - Bureau of Alcohol, Tobacco, Firearms, and Explosives
   - Bureau of Prisons
   - Drug Enforcement Administration
   - Executive Office for Immigration Review
   - Executive Office for United States Attorneys and United States Attorneys' Offices
   - Federal Bureau of Investigation
   - Office of Justice Programs
   - United States Marshals Service

2. **Is your agency and its components making progress toward managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)**

   x Yes
   ☐ N o

   Please explain your response:

As described in the 2017 Department of Justice SAORM Report, the Department of Justice (Department or DOJ) developed and continues to implement a RIM Strategic Plan that describes a RIM Program Framework and includes the program elements of governance and policy, business foundations, supporting technologies, training, and evaluation and review. The RIM Strategic Plan identifies the Department's goals within each program element area, as well as success criteria, for each goal. The Department's RIM Strategic Plan is directed at program development that supports Goal 1.1 of M-12-18.

Below are examples of new and continuing Departmental efforts, as well as component specific work that demonstrates the Department's progress toward meeting the 2019 goal:

Department of Justice Enterprise Projects

- DOJ use and refinement of the RIMCertification process that requires departmental components to provide information on recordkeeping approaches for review and certification for any new systems, services, or applications that contain records
- RIM Program collaborative engagement with the Office of the Chief Information Officer on records requirements and configuration management for O365 as the Department pilots O365 OneDrive and SharePoint in the cloud with departmental components
- continuation of the Department of Justice Capability Maturity Model (DOJ CMM) evaluation and review effort that aligns with RIM Strategic Plan Program elements ORMP uses the DOJ RIM

CMM as part of the Department's OMB A-123 controls process to measure and evaluate elements of component RIM progression and effectiveness

- a business process analysis and recommendations for development of a modernized Executive Secretariat correspondence system envisioned as an enterprise wide management system that automates workflows and incorporates electronic recordkeeping requirements for permanent records
- automation of workflows and work processes in SharePoint within multiple components as a first step to moving processes electronic

DOJ Component Specific Examples

Federal Bureau of Investigation (FBI)

First, the Federal Bureau of Investigation (FBI) has established and executed plans and processes to manage records across multiple enclaves including the unclassified, secret, and top secret networks.

Second, the FBI has created a streamlined information technology (IT) governance process. The Information Management Division (IMD) participates in the IT governance work groups and boards, which provides IMD with the opportunity to review records management compliance throughout the IT systems' lifecycle.

Third, IMD continuously conducts an extensive analysis process known as the electronic recordkeeping certification (ERKC), to ensure FBI systems retain records appropriately in an electronic format and dispose of such records according to the records retention.

Fourth, IMD proactively provides guidance to program offices which instructs them to capture, preserve, and transfer non-transitory records generated in the course of business operations outside of an electronic recordkeeping system to an ERKC approved system.

Fifth, IMD manages a robust disposition and transfer program of permanent records to NARA, including electronic records.

Sixth, IMD is currently converting permanent legacy paper files to a digital format. Upon the approval and release of NARA's Media Neutrality Standards for Digitally Converting Permanent Records, IMD will execute disposition.

Environment and Natural Resources Division (ENRD)

ENRD is configuring eDOCS Records Management System that includes access controls and dedicated space to manage permanent electronic records to ensure the

integrity of the federal records. This system also applies retention and receives transfer notifications.

Antitrust Division (ATR)

ATR uses iManage as a Document Management System without the Records Management Center. ATR is currently developing and documenting electronic record keeping requirements for analysis of alternative solutions that will maintain permanent electronic records through the entire records lifecycle. Component IT and records staff are actively engaged in a project to develop or implement a specific tool that will best support the records management program and meet the M-12-18 Goal 1.1 for managing all permanent electronic records by December 2019.

Drug Enforcement Administration (DEA)

Over the last two years, DEA's Records Management Unit (SARR) has worked closely with DEA's Headquarters, domestic, foreign, and laboratory offices to identify permanent records agency-wide and ensure those records are effectively managed for eventual electronic transfer to NARA. SARR conducted agency-wide permanent records data calls in 2017 and 2019. SARR has successfully identified all permanent records, the offices who maintain them, and their current format (i.e. paper or electronic). Electronic permanent records are being managed by the respective DEA offices with oversight by SARR and DEA's Office of Information Systems.

In addition, SARR worked closely with DEA's Office of Compliance to automate the process in which DEA creates or updates agency policies. The "policy portal" is a SharePoint platform which contains a repository for current and archived DEA policies. The electronic policy records are being maintained in an electronic format for eventual transfer to NARA.

SARR has scheduled all DEA permanent records in the *Big Bucket* retention schedule (note, the schedule is currently under review by NARA).

Office of Inspector General (OIG)

Electronic recordkeeping is the default across most OIG business processes, to the greatest extent possible and with limited exceptions. Electronic records are managed electronically in formats acceptable for transfer to NARA.

The Department has also continued to develop Departmental level policy on electronic records and messaging. To date, the department has the following policy in place:

- DOJ Policy Statement 0300.02 Use of Social Media to Communicate with the Public
- DOJ Instruction 0300.02.01 Use of Social Media to Communicate with the Public
- DOJ Order 0801, Records and Information Management
- DOJ Policy Statement 0801.01, Records and Information Management Certification
- DOJ Policy Statement 0801.02, Removal of and Access to Department of Justice
- DOJ Policy Statement 0801.03, Digitizing/Scanning DOJ Records and Information
- DOJ Policy Statement 0801.04, Electronic Mail Electronic Messaging Records Retention

- DOJ Instruction 0801.04.01 <u>Electronic Mail Instruction</u>
- DOJ Instruction 0801.04.02 <u>Electronic Messaging Instruction</u>
- DOJ Instruction 0801.04.03 <u>Capstone Account Creation</u>
- DOJ Instruction 0801.04.04 <u>Record Processing for Capstone Officials</u>
- 2015-01 DOJ Policy Memorandum, <u>Protecting DOJ Information on Mobile Devices</u>
- 2014-01(E) DOJ Policy Memorandum <u>Lync Retention</u>

3. **Has your agency implemented a plan that aligns to the criteria and requirements published by NARA in its** *Criteria for Successfully Managing Permanent Electronic Records* **(March 2018)?**

> X Yes
> ☐ N o

Please explain your response: The Department of Justice continues to develop and implement various plans across its multiple components that align with the criteria and requirements for managing electronic records published by NARA.

4. **As included in the Administration's** *Delivering Government Solutions in the 21st Century: Reform Plan and Reorganization Recommendations* **(June 2018), NARA will no longer accept paper records after December 31, 2022. Is your agency developing strategic plans, goals, objectives, and initiatives that will enable it to comply with this deadline?**

The Reform Plan states:
Transition to Electronic Environment: Transition Federal agencies' business processes and recordkeeping to a fully electronic environment, and end the National Archives and Records Administration's acceptance of paper records by December 31, 2022. This would improve agencies' efficiency, effectiveness, and responsiveness to citizens by converting paper-based processes to electronic workflows, expanding online services, and enhancing management of Government records, data, and information.

> X Yes
> ☐ N o

Please explain your response (include specific goals and example metrics):

The Department is in the process of developing a framework and targeted plan for appropriate digitization and storage in line with the business needs and resources of the Department that aligns with NARA's direction.

The Department is continuing its approach to evaluate the digitization of DOJ records to assure that digitization is appropriate and cost-effective. DOJ Policy Statement 0801.03 Digitizing/Scanning DOJ Records and Information, in place since September 22, 2014, provides clear business and technical guidance and requirements associated with digitizing/scanning projects. Components make component

level determinations on digitization projects based on component business needs, resources, and the guidelines provided by the DOJ Policy Statement.

The following includes projects ongoing from prior years, as well as projects initiated in 2018:

- Since 2002, the FBI has been actively digitizing paper and microform records through the development and continued evolution of the DocLab. The DocLab units are responsible for digitizing paper records, evidentiary material, and other hard copy format information as needed to accomplish the FBI mission. As the FBI digitizes these records, it manages the electronic versions with the same disposition schedules that apply to hard copy equivalents.
- OIG continues active digitization projects for permanent Audit reports and follow-up materials as well as for employee background investigations, and is exploring digitization of investigation cases as part of moves to automate the larger business processes.
- The Office of Justice Programs (OJP) RIM Team has been working with OJP's OCIO staff on an office-wide digitization effort to manage OJP records (temporary and permanent) in an electronic format an electronic records repository. In addition, in conjunction with that effort, OJP is working with a contractor that specializes in digitization services. This includes scanning, applying metadata, creating csv files, applying OCR to digital images, and creating PDF records.
- The Office of Professional Responsibility (OPR) has implemented an as needed scanning solution to ensure that the documentation in their document management system is the complete record. OPR records managers review paper documentation to verify their classification and retention schedule and to determine if the paper record requires storage in the electronic records management system as part of the overall record.
- The Office of the Pardon Attorney has been working on a project to digitize historic grant and denial records as well as continuing to digitize previously closed case files that are needed for current business use (as time and staffing permit).
- The Office of Information Policy (OIP) scans all incoming paper FOIA or Privacy Act requests, appeals, consultations, etc., as well as any responsive unclassified documentation as part of the FOIA case file.
- The Office of the Pardon Attorney has automation clerks working on site to digitize all of hybrid clemency casefiles to ensure compliance with the established timelines.

5.   Is your agency utilizing [General Service Administration's Schedule 36](#) to procure solutions to assist in transitioning to an Electronic Environment?

 Yes
X No

Please explain your response: The Department and its components are currently evaluating several vendors on the GSA 36 for various upcoming projects related to RIM. No vendors have yet been selected.

6. Have you, as the SAORM, established or improved your agency procedures that ensure all incoming and outgoing senior officials receive briefings on their records

management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements?

> *Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions.

> ☐ Yes
> X Changes were unnecessary (click here for your agency's 2017 report)
> ☐ No, changes are being considered but have not been made
> ☐ No

Please explain your response: In advance of the transition to the new administration, the SAORM and the Departmental Records Officer were involved in the planning for both the departure of senior staff and the onboarding of new appointees. In terms of departing staff, the Department updated checkout procedures and checklists in order better to identify records locations and management. With respect to electronic records, OCIO and ORMP worked together to incorporate changes to business processes for the opening and closing of electronic accounts which were in place during the change in administration. These changes included incorporating records managers as signing authorities for the appropriate handling of content in electronic accounts that include email and documents.

As part of the onboarding process for newly appointed senior staff, the Departmental Records Officer continues to participate with the Departmental Ethics Officer to brief every incoming political appointee in the Department of Justice within the first 90 days of their tenure.

7. **Have you, as the SAORM, ensured that your records management program has the support and resources it needs to be successful? (See NARA Bulletin 2017-02: _Guidance on Senior Agency Officials for Records Management_)**

> X Yes
>
> ☐ No

Please explain your response: The Department has engaged in strategic planning, assessed the Departmental programs, identified needs, and solicited leadership support and resources. The SAORM continues to advocate for additional resources where there are shortfalls and continuing long-term needs. In the FY2018 climate of reduced administrative budgets and hiring freezes (DOJ recently lifted the hiring freeze), the Department does not expect to be able to fully meet all resource needs, but continues to evaluate and make strategic decisions on how best to achieve program success with available resources.

8. **Have you, as the SAORM, implemented an appropriate role-based records management training program that covers recordkeeping responsibilities for all staff including those with dedicated records management roles, Federal employees, contractors, senior executives and appointees? (See [NARA Bulletin 2017-01: *Agency Records Management Training Requirements*](#))**

    X Yes
    ☐ No

Please explain your response: The Department has a Department-wide training plan provided to Records Managers that identifies stakeholder roles, essential concepts and skills, frequency, other administrative requirements. This serves as a model for component level development of component specific training. In addition, at the Department level, training sessions are offered throughout the year.

9. **Have you, as the SAORM, taken steps to direct and support Records Management staff in implementing an evaluation or auditing process to ensure records management directives, policies, procedures, and retention schedules are being properly implemented?**

    X Yes
    ☐ No

Please explain your response: As indicated in response to Question 2, the RIM Program has developed and now issued for the second time, a RIM Program Capability Maturity Model aligned with the OMB A-123 process. The RIM Program is currently analyzing the two sets of responses for effectiveness and to determine if any adjustments will improve the tool. In addition, as part of a planned effort and also in response to a recent NARA inspection, the Department is developing a framework for validating the RIM Program Maturity Model results that includes a review of the RIM Program Maturity Model questions for validity or update, development of concrete performance measures with plans to test those measures, and a percentage sampling of follow-up with Department components to review referenced policies, training, and other RIM Program business and electronic tools.

10. **Do you need support from NARA to ensure a successful transition to fully electronic recordkeeping?**

    X Yes
    ☐ No

Please explain your response:

I would be be helpful for NARA to focus its guidance and support for agencies on the following:

   a. Approaches for funding records management programs and the management of digital information in the current environment of continuing agency budgetary cuts and reduced

funding for Chief Information Officers and business offices that manage digital information.

b. Specific, more practical, and realistically implementable, approaches for managing messaging applications, such as text messaging and other forms of electronic messaging, that address the limitations on capture and management inherent in these communications tools.

c. More concrete guidance on the appropriate management of Social Media information as it relates to records retention.

d. Development or identification of automated tools that provide support for overarching records program management. NARA tends to focus its guidance on electronic recordkeeping tools that automate the management and capture of record content such as records and document management applications. Simply acquiring a records management or document management application, without management of the other elements of the records program, does not adequately support full-scale compliance with record keeping requirements.

The larger programmatic management issues include the need for other types of tools that would assist records program management. Agencies need applications or software tools that:

- facilitate the development of taxonomies
- serve as repositories for records control schedules and inventories,
- automate and assist tracking Capstone Officials, titles, names and tenures, or tools that support the analysis and approval of systems, services, or applications that house records, and
- support shared drive clean up and deduplication that meets NARA standards