



## U.S. Department of Transportation

### Senior Agency Official for Records Management (SAORM) 2018 Annual Report

#### Responsible Official

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**1. What are the agencies, components, or bureaus covered by this report and your position as SAO?**

The Department of Transportation (DOT or Department) has oversight over all Operating Administration (OA) and Secretarial Offices, collectively referred to as Components<sup>1</sup>, Records Management (RM)<sup>2</sup> programs. The DOT established a Departmental Records Management Office (DRMO) headed by the Department's Senior Agency Official for Records Management (SAORM) under the Associate Chief Information Officer (CIO) for IT Policy and Oversight within the Office of the Chief Information Officer (OCIO) to lead the strategic implementation and cross-component oversight of the Department's RM program. Under the DRMO's leadership the DOT has established the Departmental Records Management Working Group (RMWG) and built collaborative working relationships with the Components, the Office of the General Counsel (OGC), the Office of the Inspector General (OIG), and other key stakeholders to produce an operational program leveraging the knowledge and capabilities found across the Department in a sustained, rational, and effective manner.

In addition to fostering collaboration across the Department, the DRMO develops frameworks, issues standards and guidance, and promotes the common methodologies and technologies necessary to establish a Department-wide program for managing records in all formats. The DRMO promotes the OCIO vision of enterprise standards and solutions as well as cross promotion of best practices in Component efforts to meet RM requirements including but not limited to those set forth in the Federal Records Act and the Managing Government Records Directive (M-12-18).

In addition to providing Departmental oversight the DRMO supports Component RM programs by identifying and working to resolve common issues through evaluation and research of best practices and lessons learned through participation in inter-agency collaboration groups including the Federal Records Officer Network (FRON), NARA's Bi-monthly Records and Information Discussion Group (BRIDG), NARA's Electronic Records Management Working Group (ERMWG), the Federal Records Management Council (FRMC), and Senior Agency Official meetings.

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<sup>1</sup> *Components* refers to the operational elements of the Office of the Secretary (OST), the Office of the Inspector General (OIG) and the Operating Administrations (OAs). For the reporting period, the Department's OAs include; the Federal Aviation Administration (FAA), Federal Highway Administration (FHWA), Federal Motor Carrier Safety Administration (FMCSA), Federal Railroad Administration (FRA), Federal Transit Administration (FTA), Maritime Administration (MARAD), National Highway Traffic Safety Administration (NHTSA) Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Saint Lawrence Seaway Development Corporation (SLSDC).

<sup>2</sup> The term Records Management (RM) is used throughout this document and unless explicitly stated otherwise should be understood to include the entire records management lifecycle for all records including electronic records.

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

- Yes  
 No

In 2018, Component RMOs performed an inventory of all EISs including a mapping of records and associated schedules contained therein, processes to evaluate RM requirements for each EIS based on Departmental guidance were identified. Mechanisms to identify and request necessary resources to ensure ongoing compliance for all EIS. The DRMO provided oversight and tracking of Component progress towards implementation of these plans, and worked with stakeholders to remove roadblocks, identify opportunities for multi-Component collaboration, and advocated for resources. The successful planning and completion of this work required the insight, and support of integrated teams comprised of: Records Officers and Liaisons, Information Collection Officers, Privacy Officers, Enterprise Architects, IT Project Managers, and Capital Planning and Investment Control (CPIC) Coordinators.

Research of IT solutions to support more effective and efficient RM throughout the RM-lifecycle identified key benefits, risks, and other critical considerations with respect to many Commercial Off the Shelf (COTS) Products. The continuing maturation of these COTS may contribute to minimizing the records management burden of end users and enable the Department to leverage artificial intelligence and machine learning in support RM. The DRMO focused on solutions that support distributed decentralized record repositories using metadata and content-based indexing. These tools have shown an ability to be leveraged to identify redundant, obsolete, and trivial documents and artifacts eligible for disposal thereby reducing data storage requirements. The DRMO reviewed products currently in use within the Department for non-RM functions to determine their suitability for supporting ERM of document artifacts allowing better document management and reducing redundancy.

The DRMO continues to promote the integration of RM requirements into IT governance processes ensuring they are considered when acquiring and deploying EISs. In 2018 we trained IT Project Managers and RMOs to identify and manage RM requirements throughout the IT-lifecycle. In 2019, the DRMO will build templates for use by Component RMOs, Program areas, and IT Project Managers to analyze retention requirements for EISs in a consistent manner. The result will be the consistent development and execution of retention and disposition of EIS database content records. These templates will become part of the Software Engineering Services support program.

In 2019, the DRMO will work with Component RMOs to identify permanent records in analog format to understand the scope of the potential digitization efforts that may need to be undertaken by the Department. To that end, the DRMO has refined the cost benefit analysis model for digitization to include a Quality Assurance/Quality Control calculation. This allows for a more accurate calculation on the Return on Investment (ROI) including cost avoidance for the government and supports the government's decisions to digitize or continued retention of paper records.

**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)?**

- Yes  
 No

The DOT Records Management Policy (DOT Order 1351.28) maps directly to OMB Circular A-130. In 2018, the DRMO worked with the DOT RMWG and the FRON to map and identify capability gaps between the native repository capabilities of Microsoft Sharepoint and NARA's Universal ERM Requirements to native repository capabilities. In 2019 these gaps will be reviewed and recommendations of alternatives for how to bridge those gaps will be identified. Alternatives may include but will not be limited to additional add on COTS products, custom development, or application of other technological solutions such as lexicon derived heat maps.

In 2019, the DRMO will work with Component RMOs to leverage existing record inventories and associated schedules to consult with stakeholders about projected cost and alternative cost avoidance measures.

**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.***

- Yes  
 No

Beginning with the draft release of NARA's Strategic Plan ([NARA 2018-2022](#)) the Department began evaluating alternatives to analog records with the release of the NARA 2018 Strategic Plan and has been moving forward in several areas to meet all of the Department's records management needs. These approaches have since been refined to reflect the Administration's Reform Plan. In 2018 the DRMO developed a Digitization Cost Benefit Analysis (CBA) tool to support ROI calculations for digitization of analog records. including standards based Quality Assurance/Quality Control (QA/QC) metrics.<sup>3</sup>

Ensuring the DOT has an accurate inventory of its off-site records holdings, the DRMO has prioritized the analysis of the current billing processes to ensure timely destruction of temporary records and transfer of permanent records to NARA. Working with the Component RMOs and the NARA Federal Records Center (FRC) the DRMO anticipates cost avoidance by ensuring timely disposition and to leverage those recovered resources to meet other Component Records needs. The

<sup>3</sup> The Department was pleased to see NARA's draft guidance for digitizing temporary records and eagerly anticipates NARA's guidance on digitizing permanent records that is expected to be released in 2020. The Department is pleased to learn that NARA plans to include a standards-based QA/QC procedure in the digitization of permanent records guidance.

DRMO and Component RMOs are also prioritizing records eligible for transfer to the FRC and/or NARA. The DRMO is actively reviewing all records collections previously identified as “permanent” to ensure that this retention decision remains valid. In addition to validating schedule timeframes, the reviews will ensure all schedules for permanent are media neutral and updated to reflect current needs of NARA and the Department.

Also in 2019, the DRMO is working with Component RMOs and their stakeholders to analyze and assess the volume of paper records currently stored in offices and the FRC to ensure proper retention is being applied. The results of the assessment will also aid in anticipating the Department’s storage needs for analog records after December 31, 2022 and plan according including both automation, digitization and alternative off-site storage.

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

- Yes  
 No

In 2018 the DRMO provided RM and IT staff training on the benefits of utilizing GSA Schedule 36 for supporting migration into an all-electronic records management environment. For 2019, the DRMO is working with Contracting Officers, Contracting Officer Representatives, stakeholders, and Component RMOs to make informed decisions on digitization efforts by utilizing the Department’s cost model tool referenced above. Where appropriate the Department utilizes GSA Schedule 36 in support of these digitization efforts.

**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  
 Changes were unnecessary (click [here](#) for your agency’s 2017 report)  
 No, changes are being considered but have not been made  
 No

The Department ensures that all officials, senior and non-senior, receive briefings and training related to documenting public service, the use of personal email and other recordkeeping requirements. The Department leverages existing on-boarding and off-boarding processes and resources in this outreach including but not limited to OCIO leadership teams, Office of General Counsel, the DRMO, and Component resources as appropriate.

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](#))

- Yes  
 No

In ensuring the resources needed, the Department considers the mission of the agency, volumes and formats of records including both analog and digital records as well as retention and disposition of those records. Risks are identified for records and associated information technology investments are managed throughout the IT and RM lifecycles to meet records management requirements.

For digital records, the Department has taken a three-pronged attack to managing the unique requirements for email, Electronic Information Systems (EISs), and documents and artifacts. In 2019, the DRMO will develop reusable templates for the Department's Destinations Digital effort that describe tasks for records retention and records disposition. These templates will enable the OCIO to engage programs and stakeholders to meet their electronic records management requirements.

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](#))

- Yes  
 No

In its 2018 Inspection report, NARA recommended, the Department provide additional training to Records Liaisons to ensure that they had adequate training and resources necessary to execute their responsibilities. In response, the DRMO established a crosswalk between all the RM responsibilities including those for non-RM staff outlined in Departmental policy, and available internal and training. The crosswalk is searchable by role, course, provider, and "focus area" ensuring that staff (including contractors) can clearly identify training meant to address their specific needs. In addition, the Department holds an annual Records Management Awareness Week which includes sessions targeted at specific communities such as Counsel and cybersecurity professionals to understand both their responsibilities for managing specific records collections as well as their roles in supporting the RM program and processes.

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?**

- Yes  
 No

The Department through the DRMO and its RMWG has leveraged the NARA audit of the DRMO to strengthen the overall records management program. In 2018, the DRMO planned an evaluation of



the FAA records management program and supported new Records Management Officers at two of the Components while they completed their NARA Certified Federal Records Manager training.

The Department strives for continuous improvement of the records management program through evaluations and recommendations to Component RMOs. This includes, as mandated in the Department's Records Management policy, review and approval of all proposed record schedules by Component RMOs prior to submission to NARA in ERA.

The Department also utilizes a rigorous Privacy review process that coordinates and aligns record schedules and Privacy Act system of records notices (SORNs) through the Privacy Threshold Assessment process.

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

- Yes  
 No

The NARA update to the GSA Schedule 36 was big help to the Department's migration towards a fully electronic recordkeeping business model. Information Technology (IT) support is usually acquired through GSA Schedule 70. A cross reference between the GSA Schedule 70 and GSA Schedule 36 would enhance collaboration between the RM and IT communities by providing a single information source of all digital transformation vendors.

To support the SAORM's ability to manage the Department's federal record assets, the Department requests NARA enable data downloads from or Application Program Interfaces into ARCIS and ERA. The manual process required to transform the current reports into data analytics introduces error and is not necessary in the current digital environment. By providing data downloads the Department will be able to more rigorously review data accuracy in these systems and provide more complete analytical review across the Component.

The DOT recommends that NARA declare all current schedules media neutral. This reduces the burden of agencies to develop, review, and approve new schedules and eases the transition to fully electronic recordkeeping. This is the equivalent to the old "pen and ink" change that NARA performed prior to ERA.

The Department eagerly awaits the final Guidance on Digitization of Temporary Records expected in 2019 and looks forward to the NARA Digitization Guidance of Permanent Records in 2020 which will assist agencies in transitioning to fully electronic recordkeeping.