



NATIONAL  
ARCHIVES

---

OFFICE *of the*  
CHIEF RECORDS  
OFFICER

**RECORDS MANAGEMENT OVERSIGHT ACTIVITIES  
JANUARY 1 THROUGH JUNE 30, 2024**

*Semi-Annual Report*

National Archives and Records Administration  
August 2024

# RECORDS MANAGEMENT OVERSIGHT ACTIVITIES

## SEMI-ANNUAL REPORT

### JANUARY 1 THROUGH JUNE 30, 2024

#### INTRODUCTION

NARA's Records Management Oversight and Reporting program of the Office of the Chief Records Officer conducts oversight through:

- Inspections—including tracking plans of corrective action (PoCA)
- Topical records management (RM) assessments
- Analysis of annually required reports submitted by federal agencies
- Tracking of unauthorized disposition (UD) allegations

This report, which covers the program's oversight activities from January 1 through June 30, 2024, includes the following five sections:

- Completed Oversight Activities
- Trends
- Summarized Results
- Recommendations for Executive Action
- Ongoing Oversight Activities

#### COMPLETED OVERSIGHT ACTIVITIES

During this six-month period, we completed the following oversight activities:

- Agency Inspections
  - [Department of Transportation/Federal Aviation Administration Records Management Program Inspection](#)
  - [Records Management Practices of Legislative Agencies: Multi-Agency Inspection](#)
- Records Management and Systems Assessments
  - [Unauthorized Disposition Safeguards Assessment](#)
- Annual Reporting Process
  - Agencies were required to report to us on RM activities conducted in CY 2023 by March 8, 2024, using the
    - Senior Agency Official for Records Management (SAORM) Annual Report
    - Records Management Self-Assessment (RMSA) Federal Electronic Records and Email Management (FEREM) Report
  - We validated the self-reported data using internal and external sources.
  - We drafted the Federal Agency Records Management 2023 Annual Report to Congress, which is still undergoing review. See previous reports [here](#).
  - We published the [2023 SAORM Reports](#) and the [FEREM results](#) to our websites.

We also continue to monitor agency PoCAs following completed inspections. As of June 30, 2024, NARA is actively working with agencies on 61 open PoCAs with 667 total recommendations. For the open PoCAs, 200 recommendations have been closed as a result of agency action.

## **TRENDS**

- The most concerning trend is the reported erosion of support for the importance of RM at the senior official and program manager levels.
- Annual reporting data indicates SAORMs need to continue to provide more leadership and strategic direction for developing agency electronic RM programs.
- The transition to electronic recordkeeping is ongoing. Most agencies said they would meet the NARA and Office of Management and Budget (OMB) goals required in Memorandums M-19-21 and M-23-07; however, a significant percentage (over 25%) said they would not.
- Many agencies that are digitizing records to meet the memorandum goals do not have validation processes in place to ensure they comply with 36 Code of Federal Regulations (CFR) 1236 Subpart E.
- Agencies are increasingly reporting a moderate level of risk in their management of electronic records and email as opposed to low risk for which they should be aiming.
- Employees that are assigned RM responsibilities as a collateral duty do not have time to carry out those responsibilities.
- Agencies do not have strategic plans for their RM programs, which results in ad hoc problem solving instead of continuous improvements.

## **SUMMARIZED RESULTS**

### **DEPARTMENT OF TRANSPORTATION/FEDERAL AVIATION ADMINISTRATION RECORDS MANAGEMENT PROGRAM INSPECTION**

NARA inspected the RM program of the Department of Transportation (DOT) Federal Aviation Administration (FAA). The purpose of this inspection was to examine how well the FAA complies with federal RM statutes and regulations and to assess the effectiveness of its RM policies and procedures. In particular, it focused on managing electronic records, with emphasis on policies, strategic planning, training, and oversight. The engagement emphasized the coordination of records management program implementation across the FAA, including elements of Headquarters (HQ), Lines of Business (LOB), and Staff Offices (SO).

The FAA RM program is in a rebuilding effort to regain the visibility and effectiveness of the records program. The FAA's RM program complies with many, but not all, of the federal regulations. It also has several noteworthy practices for revitalizing the RM program and managing electronic records such as:

- Development of an electronic RM application and toolkit (ERRA)
- Retooling RM training making it mandatory for all personnel
- Increasing coordination and communication with records coordinators/file custodians throughout the FAA's Community of Practice

- Reviewing FAA records schedules

### **RECORDS MANAGEMENT PRACTICES OF LEGISLATIVE AGENCIES: MULTI-AGENCY INSPECTION**

NARA conducted a multi-agency inspection of the RM programs at five legislative agencies. The purpose of this inspection was to examine how agency records officers coordinate with office and program staff regarding records management and to inspect for compliance with 36 CFR Chapter XII.

Overall, the participating agencies were small agencies, each with a few hundred personnel. One agency had fewer than 100 employees, and none of the agencies had locations other than their agency headquarters. Most of the participating agencies established and maintained efficient and effective records management programs. While these agencies are subject to the Federal Records Act and regulations outlined in 36 CFR Chapter XII, Subchapter B, they are not required to follow OMB Memorandums or NARA Bulletins or guidelines. However, participating agencies stated that they use these Memorandums, Bulletins, and guidelines to advise and guide their programs.

Some overall observations included:

- Only one agency did not have established RM policies and procedures.
- Three agencies demonstrated formalized annual training for all employees and contractors.
- Permanent records are not being managed electronically at all agencies.
- Records retention schedules were not up to date. Some agencies cited older versions of the General Records Schedules or had unscheduled records.
- All agencies had established essential programs. Only one agency did not have a designated manager to oversee the essential records program.
- Three of the five agencies are conducting evaluations or audits of the effectiveness of their RM programs and practices.

### **UNAUTHORIZED DISPOSITION SAFEGUARDS ASSESSMENT**

NARA conducted an assessment of the RM policies, practices, and procedures at seven agencies associated with incidents of unauthorized disposition (UD) of records to determine if the development and implementation of safeguards for certain closed UD cases is adequate and effective.

Participating agencies included:

- Department of Agriculture - Agriculture Research Services
- Department of Defense - Air Force
- Department of Defense - Defense Logistics Agency
- Department of Defense - Office of the Secretary of Defense
- Department of Homeland Security - US Coast Guard
- Department of Justice - Federal Bureau of Investigations
- Department of Treasury - Internal Revenue Service

This comprehensive review of 38 UD cases, including the reporting, investigation, and development of safeguards across participating agencies, highlighted the critical role that robust RM policies, procedures and training play in mitigating the risk of UD incidents. Agencies are encouraged to adopt a proactive and collaborative approach to RM when UD incidents occur to better protect federal records from unauthorized disposition.

### **ANNUAL REPORTING 2023**

The results of the 2023 annual reports show that much work has been done by agencies to meet the goals set out in M-19-21 and M-23-07, but more work is needed. While the June 30, 2024, deadline has now passed, some agencies are still working to meet the goals of the memorandums—and this work must continue. Even for those agencies who have met the deadline, records management is a continuous process. Agencies must ensure they are in compliance with federal records management statutes and regulations, keep abreast of new and existing policies and guidance, and strive to make improvements to their overall records management programs. The complete Federal Agency Record Management Report will be published later this year. The individual agency SAO Reports are available on our [website](#).

### **RECOMMENDATIONS FOR EXECUTIVE ACTION**

Overall, the challenges facing federal RM programs remain fairly consistent and must be faced with concerted effort and leadership. We believe that publishing the reports of our oversight activities semi-annually helps identify common themes and trends in RM, particularly for those agencies that have not yet been inspected or otherwise engaged with us. We encourage SAORMs, other Senior Agency Officials, as well as Agency Records Officers and other Records Managers, to use this information to identify where they may have similar issues and proactively make adjustments.

NARA makes the following recommendations for SAORMs to consider based on the oversight activities covered by this report:

- SAORMs must ensure through policy and oversight that support for RM exists at all levels within their agencies including senior officials, executives, and program managers.
- SAORMs must establish a strategic plan for their RM program that outlines goals and objectives.
- SAORMs must provide leadership for their programs and ensure they are properly resourced and aligned with the agency's strategic information resources management plans.

Proper records management supports transparency and government accountability and allows agencies to create and retrieve information required to accomplish mission goals. NARA is committed to working with federal agencies to improve records management across the government to advance these important goals.

### **ONGOING OVERSIGHT ACTIVITIES**

The following ongoing projects are expected to be completed in the second half of CY 2024.

- Approval and publication of the Federal Agency Records Management 2023 Annual Report
- Environmental Protection Agency Records Management Program Inspection
- Small Business Administration Records Management Program Inspection
- Indian Affairs Records within the Department of the Interior's Office of Indian Affairs, and the Bureaus of Indian Affairs, Trust Funds Administration and Indian Education, and the American Indian Records Repository Multi-Agency Inspection
- Database Internal Control Review System Inspection

For more information on our oversight activities, including previous inspection and assessment reports and correspondence relating to allegations of unauthorized disposition of federal records, please see our [website](#).



NATIONAL  
ARCHIVES

---

OFFICE *of the*  
CHIEF RECORDS  
OFFICER