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Department of Defense
Joint Staff and Combatant Commands
Records Management Programs

Records Management Inspection Report

National Archives and Records Administration
April 2020

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DEPARTMENT OF DEFENSE JOINT STAFF AND COMBATANT COMMANDS RECORDS MANAGEMENT PROGRAMS

INSPECTION REPORT

INTRODUCTION

The National Archives and Records Administration (NARA) is responsible for assessing 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, and based on authority granted by 44 United States Code (U.S.C.) 2904(c) (7) and 2906, 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, if necessary, to make improvements to their programs based on inspection findings and recommendations.

NARA inspected the records management (RM) programs of the Department of Defense Joint Staff (JS) and the Combatant Commands (CCMDs) (see Appendix B for the list of CCMDs) as part of a multi-year plan to inspect the RM programs of the Department of Defense (DoD) components. The purpose of this inspection was to examine how well the JS and CCMDs comply with Federal records management statutes and regulations and to assess the effectiveness of its records management policies and procedures. In particular, it focused on the management of electronic records, including email and social media communications, with emphasis being placed on policies, strategic planning, training, and oversight. Additionally, it sought to identify practices of interest to other DoD components and the wider Federal records management community. This report includes issues or challenges that require attention at the Department Level and will be reported to DoD separately for appropriate action as needed.

OVERVIEW OF THE JS AND CCMDs RECORDS MANAGEMENT PROGRAMS

The records management program within the JS and CCMDs is a complex, decentralized federation of autonomous programs with oversight, coordination and facilitation by the Chief, Joint Staff Information Management Division (IMD) and the Joint Staff Records Manager. There are eleven formally designated Agency Records Officers (ARO) known as Records Managers for the JS and the ten CCMDs with each recognized by NARA as component agencies of DoD.

The Chairman of the Joint Chiefs of Staff Instruction (CJCSI) 5760.01A[2] assigns oversight and implementation responsibilities for all RM programs to the Chief, IMD and JS Records Manager. CJCSI 5760.01A requires coordination between the JS and CCMD RM programs and includes common records retention scheduling, issuing directives and policies, and conducting periodic staff assistance visits internal to the Joint Staff and of the Commands for oversight. In addition, CJCSI 5760.01A requires each Combatant Commander to designate a CCMD Records Manager that is responsible for their CCMD records management program to implement and comply with NARA regulations, and DoD and JS policies. Each CCMD develops its own internal RM

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[1] 44 U.S.C. Chapter 29, https://www.archives.gov/about/laws/records-management.html.
[2] CJCSI 5760.01A, *Records Management Policy for the Joint Staff and Combatant Commands*, 18 July 2012.

policies, training, and evaluations for RM oversight. The reporting and alignment of the CCMD RM programs, to include staffing, resources and support for the program, are determined by the individual CCMDs, and vary significantly. Therefore, NARA's approach to the inspection included not only the JS program, but also the RM programs of the CCMDs as individual programs, with program summary profiles provided in Appendix A for the JS and each of the CCMDs.

This report makes 12 findings and 22 recommendations that will assist the JS and CCMDs as a whole to minimize risks and bring its RM programs into compliance. This report also notes several areas where the JS and some of the CCMDs have implemented electronic recordkeeping practices that are more advanced than other DoD components that DoD should take into consideration. These are noted in a separate section of the report after the findings and recommendations.

FINDINGS AND RECOMMENDATIONS

Implementation of RM program elements, such as program support, policies and directives, training, evaluations, RM integration with Information Technology (IT), Electronic Records Management as a whole, and implementation of records retention schedules (either transferring permanent records to the National Archives or disposal of temporary records), varies for the JS and CCMDs. The findings and recommendations listed below identify program elements required by 36 Code of Federal Regulations (CFR) Subchapter B, that the JS and/or CCMDs are not compliant or partially compliant, with JS and/or CCMD applicability identified below each finding title.[3]

The chart below provides the level of compliance for the JS and CCMDs RM programs in meeting the 36 CFR requirements as part of this inspection. It is intended to show a summary of all programs, and not a comparison since organizational missions and program resources vary. Note: CYBERCOM is a new CCMD, established in May 2018, and is in the early stages of establishing an RM program.

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[3] 36 CFR Chapter XII, Subchapter B, Records Management, https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title36/36CXIIsubchapB.tpl.

REQUIREMENTS	Joint Staff	AFRICOM	CENTCOM	CYBERCOM	EUCOM	INDO-PACOM	NORTHCOM	SOCOM	SOUTHCOM	STRATCOM	TRANSCOM
Program Support	✓	✓	✓	X	∂	X	✓	∂	X	✓	∂
Strategic Planning	∂	∂	✓	N/A	∂	X	∂	∂	X	∂	✓
Policies and Directives	∂	✓	✓	N/A	∂	∂	✓	∂	∂	✓	✓
Records Scheduling	∂	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Training	✓	✓	✓	X	✓	∂	✓	∂	✓	✓	∂
Evaluations	∂	✓	✓	N/A	✓	∂	✓	∂	X	∂	∂
Electronic Records Management	∂	∂	✓	N/A	∂	X	✓	∂	∂	∂	∂
RM Integration with IT	∂	X	✓	N/A	X	X	✓	X	X	X	✓
Email Management	∂	∂	∂	N/A	∂	X	∂	∂	∂	∂	∂
Permanent Transfers	✓	N/A	∂	N/A	X	X	N/A	X	X	X	X
Temporary Dispositions	∂	X	∂	N/A	∂	∂	✓	∂	∂	∂	X
COMPLIANCE LEVELS	X	Not Compliant		∂	Partially Compliant			✓	Fully Compliant		

PROGRAM MANAGEMENT REQUIREMENTS

Finding 1: There is a need for more support for the RM programs at some CCMDs to improve compliance with Federal RM statutes and regulations, and DoD RM directives.

Applicable to: CYBERCOM, EUCOM, INDO-PACOM, SOCOM, SOUTHCOM, and TRANSCOM.

Proper records management is essential to ensuring information and documentation is available for decision making and for accountability. Therefore it should be included as an asset to an agency's mission. DoD Instruction (DoDI) 5015.02 states, "*The information and intellectual capital contained in DoD records will be managed as national assets.*"[4] This requires recognition, strategic direction, and support from senior leadership, as well as support from managers and supervisors at multiple levels. It also requires partnerships and cooperation with various functional offices within the organization. To this end, NARA and the Office of Management and Budget (OMB) established the requirement that all Executive Branch agencies designate a Senior Agency Official for Records Management (SAORM).[5] The SAORM bridges the gap between the agency head and the agency records officer in order to provide strategic direction and advocacy for the agency's records management program.[6]

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[4] DoDI 5015.02, *DoD Records Management Program*, 24 February 2015.

[5] The designation of a SAORM is required as part of OMB Circular A-130, *Managing Information as a Strategic Resource;* and the OMB/NARA *Managing Government Records Directive* (M-12-18).

[6] The roles and responsibilities of the SAORM are clarified in NARA Bulletin 2017-02: *Guidance on Senior Agency Officials for Records Management*, https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html, published September 28, 2017.

The SAORM for the JS is fully aware of his RM responsibilities and is supportive of the program. Leadership support for the JS RM Program is strong and the program has been allowed to expand its staffing levels and restructure personnel assignments to cover areas of expertise that reflect the many elements of an RM program prescribed by 36 CFR 1220.34. The program is also strengthening its partnerships with other JS functional offices, such as the General Counsel, Public Affair, the Privacy Office, and the Director's Action Group, to gain better support for the program. Some CCMDs also receive excellent support from their senior leadership and have established strong partnerships and working relationships with functional offices within their CCMDs, to include NORTHCOM, CENTCOM, and STRATCOM, resulting in these CCMDs having the strongest RM programs. AFRICOM and TRANSCOM also noted that, while some areas of their programs need improvement, senior leadership supports their programs.

There are other CCMDs, however, where not all areas of the programs are fully supported, integrated, or funded. For example:

- One CCMD Records Manager is filling a position that had been vacant for a while and is a two-year term position that ends in January 2020.
- Another CCMD Records Manager was recently assigned Records Manager responsibilities along with four other additional duties, resulting in little time to establish the RM program for the new CCMD.
- Two CCMD Records Managers, where RM is being integrated into Knowledge Management (KM), are not included when KM officials plan and execute RM initiatives impacting their programs, including deletion or disposal of records that may or may not be in accordance with NARA-approved retention schedules.
- Several CCMD Records Managers indicated that they were unable to get personnel to complete required annual RM training due to push back or refusals by personnel.
- Some CCMD Records Managers are unable to evaluate units located outside of their headquarters due to lack of funding.

Recommendation 1.1: The JS SAORM should communicate to the applicable CCMD senior leaders the need for better support of their RM program within the CCMD in order help bring the program into compliance with Federal regulations, NARA policies, and DoD and JS directives. (NARA Bulletin 2017-02)

Recommendation 1.2 CCMD Records Managers, with support from their senior leaders, should strengthen partnerships with functional offices within their CCMD to gain better support towards improving non-compliant areas of the programs.

Finding 2: The JS and CCMDs lack an overall comprehensive strategy for their RM programs.

Applicable to: JS and all CCMDs, except CENTCOM and TRANSCOM.

36 CFR 1222.26(e) requires Federal agencies to develop policies, procedures, and strategies for ensuring that records are retained long enough to meet programmatic, administrative, fiscal, legal, and historical needs as authorized in a NARA-approved disposition schedule. In addition, OMB Circular A-130 also includes specific requirements related to strategic elements of RM

programs that are to be included in the agency's Information Resource Management (IRM) Plan.[7] As such, the SAORM is responsible for setting the vision and strategic direction for the RM programs, including incorporating the RM goals into that plan.[8]

The JS has developed a draft RM strategic plan for the JS, titled Data Records Electronic Asset Management Strategy, which includes eight specific goals for managing its electronic records more effectively. In addition, some of the CCMDs have different documents containing RM strategic goals or objectives, such as:

- NORTHCOM's and STRATCOM's slide presentations containing RM goals;
- TRANSCOM's goals for converting to an electronic environment; and
- SOCOM's directive containing some RM objectives.

CENTCOM and TRANSCOM were the only CCMDs that had complete RM strategic plans at the time of the inspection. However, a comprehensive overall strategic plan for the JS and CCMDs, to provide a coordinated framework and milestones for completion, does not exist.

Recommendation 2: The JS Records Manager, working with the CCMD Records Managers, must develop a strategic plan with common goals and objectives to be approved and implemented by the Chief, Information Management Division with support from the JS SAORM. (36 CFR 1222.26(e), OMB Circular A-130, and NARA Bulletin 2017-02)

Finding 3: The JS and many CCMD RM directives and policies are outdated, in draft form, or lack essential information.

Applicable to: JS, EUCOM, INDO-PACOM, SOCOM, and SOUTHCOM.

36 CFR 1220.34(c) requires agencies to issue a directive(s) establishing program objectives, responsibilities, and authorities for the creation, maintenance and disposition of agency records.

Review of the RM directives, policies, and manuals provided to the inspection team show that several of the CCMDs have current, comprehensive RM directives and policies that have been finalized and distributed within their CCMDs. The JS and some of the other CCMDs were in the process of revising their directives and policies at the time of the inspection, while others were not and their directives were outdated, with many of the directives lacking specific information regarding:

- the management of electronic records, including email, social media, and records in cloud environments;
- procedures for transferring permanent records to NARA;
- the storage of long-term temporary and permanent electronic records;
- managing essential (vital) records;
- procedures for litigation and Freedom of Information Act (FOIA) record searches;

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[7] OMB Circular A-130, *Managing Information as a Strategic Resource*, July 28, 2016, https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A130/a130revised.pdf.
[8] NARA Bulletin 2017-02: *Guidance on Senior Agency Officials for Records Management*, https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html, published September 28, 2017.

- the reporting of unauthorized dispositions; and
- the requirement for all personnel to receive RM training.

Recommendation 3: The JS and applicable CCMDs must update, finalize, approve, and distribute its RM directives, policies and/or manuals. (36 CFR 1220.34(c))

RECORDS SCHEDULING REQUIREMENTS

Finding 4: The JS records retention schedule is outdated and does not contain dispositions for all JS and CCMD records.

Applicable to: the JS.

36 CFR 1224.10(a) requires Federal agencies to ensure Federal records are scheduled. This requirement applies to records in any medium.

The JS and CCMDs' records are scheduled in a 'flexible schedule,' sometimes referred to as a 'big bucket' schedule, that was approved in January 2012, and published in CJCS Manual (CJCSM) 5760.01A, Volume II, in July 2012.[9] The schedule applies to the JS and all CCMDs, and supersedes all previous JS schedules. The schedule does not cover records in electronic information systems (EIS). It was last reviewed and re-published in September 2014.

Review of the JS schedule shows that it contains no dispositions for the records of the Office of the Chaplain, and does not include General Records Schedule (GRS) updates from 2015-2018.[10] In addition, the schedule has obsolete dispositions for electronic mail (email) records, as the JS and CCMDs plan to implement the Capstone Approach. Implementation of the Capstone Approach will depend upon receipt and approval from NARA of all the GRS 6.1 NARA Form 1005s.[11] Currently, only the JS and the CYBERCOM have submitted Form 1005s to NARA. Also, while some of the JS EIS were scheduled during 2006-2009, separate from the flexible schedule, many JS and CCMD EIS have not been scheduled.

At the time of the inspection, the JS initiated projects to: conduct inventories of all records; review and update the flexible schedule; ensure that all CCMDs have submitted a GRS 6.1 NARA Form 1005; and, schedule all EIS.

Recommendation 4.1: The JS must complete the inventory of all records and update its flexible schedule with new and missing dispositions, to include a crosswalk or other addendum to reflect changes to the GRS. (36 CFR 1225.12)

Recommendation 4.2: The nine remaining CCMDs must submit the GRS 6.1 NARA Form 1005 to NARA. (36 CFR 1225.10)

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[9] CJCSM 5760.01A, Vol. II, *Joint Staff and Combatant Command Records Management Manual*, Volume II: *Disposition Schedule*, current as of 15 September 2014. The NARA-assigned control number for the schedule is N1-218-10-5.

[10] Flexible Schedules, https://www.archives.gov/records-mgmt/faqs/flexible-scheduling.html.

[11] NARA GRS 6.1: *Email Managed under a Capstone Approach*, https://www.archives.gov/files/records-mgmt/grs/grs06-1.pdf, September 2016.

Recommendation 4.3: The JS must submit requests for disposition authorities for EIS that contain electronic records. (36 CFR 1225.10 and NARA Bulletin 2010-02)

TRAINING REQUIREMENTS

Finding 5: In some CCMDs, not all personnel receive RM training.

Applicable to: JS, AFRICOM, CYBERCOM, EUCOM, INDO-PACOM, SOCOM and TRANSCOM.

36 CFR 1220.34(f) requires agencies to provide guidance and training to all agency personnel on their records management responsibilities. In addition, NARA Bulletin 2017-01 provides the minimum required content areas for annual records management training and role-based RM training.[12]

The JS and many of the CCMDs have strong RM training programs, with most that are annually mandated for all personnel and made available through Joint Knowledge Online (JKO). In addition, the JS and many of the CCMDs have developed role-based RM training for Records Officers (RO) assigned to directorates and other functional offices. Recognizing the importance of RM training, the JS Records Manager assigned a full-time RM staff member devoted to developing all RM training for the JS, and to provide training guidance and assistance to the CCMDs.

RM training at some of the CCMDs, however, is very challenging to deliver to personnel assigned to CCMD components located in Offices of Military Cooperation, Offices of Defense Cooperation (ODC), and Defense Courier Stations. Most personnel assigned to these components are not on the DoD network and cannot access the RM training in JKO. RM training for these personnel is provided face-to-face by the CCMD Records Managers when Staff Assistance Visits (SAV) are conducted, but only when the CCMD Records Manager is included as a SAV team member and travel funds are provided. In addition, the personnel turn-over rate for many personnel at these components is very high, requiring constant visits.

It was also reported to the inspection team that, while most of the CCMDs have effective RM training programs, many experience a lot of unnecessary push-back and refusal from personnel to complete the annual training. Only one CCMD needs to improve RM training where the training materials were outdated, and role-based RM training for directorate/office ROs is provided only if requested. It was also noted, in reviewing the RM training materials for the JS Action Officers, that it contains information and visuals where the RM functions performed by Action Officers is presented in a way that devalues the importance of RM and minimizes the effectiveness of RM training.

Recommendation 5.1: CCMDs that do not mandate RM training annually must do so in accordance with federal and DoD requirements. (NARA Bulletin 2017-01 and DoD 5015.02)

Recommendation 5.2: The CCMD Records Managers, working with the JS RM Training

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[12] NARA Bulletin 2017-01: *Agency Records Management Training Requirements*, https://www.archives.gov/records-mgmt/bulletins/2017/2017-01-html, published September 28, 2017.

Manager, must develop an effective delivery method for personnel at CCMD components unable to access required annual RM training. (36 CFR 1220.34(f) and NARA Bulletin 2017-01)

Recommendation 5.3: The CCMDs must complete role-based RM training for directorate/office ROs. (36 CFR 1220.34(f) and NARA Bulletin 2017-01)

Recommendation 5.4: RM training materials for the JS Action Officers should be reviewed and revised with content that accurately reflects the importance of records management and its role within information governance.

EVALUATION REQUIREMENTS

Finding 6: Not all CCMDs conduct evaluations of their RM programs, and recent JS evaluations of the CCMD RM programs do not require corrective action.

Applicable to: JS, INDO-PACOM, SOCOM, SOUTHCOM, STRATCOM, and TRANSCOM.

36 CFR 1220.34(j) requires agencies to conduct formal evaluations to measure the effectiveness of RM programs and practices. In addition, DoDI 5015.02 requires periodic reviews of RM programs with a written summary.

The JS conducts SAVs of the CCMD RM programs, as well as internal SAVs of its directorates and functional offices. The most recent SAVs of all CCMD RM programs began in 2018, and were underway at the time of the inspection with half of the CCMDs visited when NARA's site visits began in April 2019. The results of these SAVs have not been shared with the applicable CCMD Records Managers, and is pending the completion of all CCMD SAVs. Prior to these CCMD SAVs, the JS conducted SAVs in 2008 and documented the results in a white paper for the DoD Chief Information Officer (CIO).[13] The white paper outlined several findings and recommendations, and a description of the RM programs. Some of what was found in the white paper ten years ago has not changed. This is due, in part, because the white paper was not finalized (still a draft), and because a white paper, instead of a formal inspection report, does not require action be taken for recommendations.

Internal evaluations conducted by the CCMDs are in the form of SAVs and/or inspections in partnership with their CCMD Inspector General (IG). The partnership of CCMD Records Managers with their IGs, noted at CENTCOM, EUCOM and NORTHCOM, proves to be very effective in that IG reports receive high visibility by CCMD senior leadership, and the IG's formalized inspection process requires corrective actions be taken. SAV's at other CCMDs, however, are limited to the CCMD headquarters, and are conducted at their components only if funding is made available, of which most do not receive. One CCMD indicated that it no longer partners with their IG as it did in the past, and has not conducted SAVs in several years due to lack of corrective actions being taken. Another CCMD, where SAVs were performed regularly in the past, and had NARA visit three of its components, also indicated that some of its components ignore making corrective actions.

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[13] White paper for the DoD CIO, *Status of the Joint Staff and Combatant Commands' Records Management Program*, dated November 2008.

Recommendation 6.1: The JS RM Program must require, as part of its evaluation process, formal written reports that require findings and recommendations be acted upon to improve and bring the RM programs into compliance. (36 CFR 1220.34(j))

Recommendation 6.2: The JS and the CCMD RM programs must require, as part of its evaluation process, formal written plans of corrective action in response to evaluations, and monitor actions until completion. (36 CFR 1220.34(j))

Recommendation 6.3: CCMD Records Managers, working with the JS and their CCMD leadership, should seek funding to conduct RM evaluations of all CCMD components as required by JS and DoD policies.

ELECTRONIC RECORDS MANAGEMENT REQUIREMENTS

Finding 7: RM is not consistently incorporated or integrated into the JS and most CCMD IT processes for EIS.

Applicable to: JS and all CCMDs, except CENTCOM, NORTHCOM, and TRANSCOM.

36 CFR 1236.6(b), OMB Circular A-130, and DoDI 5015.02 requires the integration of RM and preservation considerations into the design, development, enhancement, and implementation of EIS.

RM integration with IT and EIS at the JS and CCMDs varies from non-existent to full integration, with only CENTCOM, NORTHCOM, and TRANSCOM being fully integrated. These three CCMDs have been able to establish good partnerships with their Command, Control, Communications, and Computers/Cyber Directorate (J6) to build RM into their IT processes to include: early involvement with the design, development, implementation, and decommissioning of their CCMD's EIS.

While the JS and some of the CCMDs are working towards these same goals, or plan to do so, some CCMDs have no involvement at all with their IT offices.

Recommendation 7: The JS and CCMDs must work with their J6 to involve the CCMD Records Managers and incorporate RM into its IT investment processes for the design, development, enhancement, and implementation of EIS to ensure compliance with OMB Circular A-130 and DoDI 5015.02. (36 CFR 1236.6(b))

Finding 8: The JS and most CCMDs do not have complete inventories of their EIS that contain electronic records.

Applicable to: JS and all CCMDs, except CENTCOM, NORTHCOM, and SOCOM.

36 CFR 1225.12(a) requires agencies to prepare an inventory of each function or activity to identify records series, systems, and non-record materials and NARA Bulletin 2010-02 requires Federal agencies to schedule their electronic systems using the EIS inventories from IT.[14]

As mentioned in Finding 4, most EIS at the JS and CCMDs are not covered by an approved NARA retention schedule. The DoD Information Technology Portfolio Repository (DITPR) contains a list of all major EIS on the DoD network, including EIS used by the JS and the CCMDs, that would be a good source for the JS and CCMDs.

At the time of the inspection, CENTCOM, NORTHCOM, and SOCOM had inventories of the EIS used in their CCMDs; the JS had a partial list for the JS, while the other CCMDs had no EIS inventories.

Recommendation 8: The JS and CCMDs must work with their J6 to regularly receive complete inventories of EIS in order for the JS to schedule its electronic records in systems that are not moved into records management solutions. (36 CFR 1225.12(a) and NARA Bulletin 2010-02)

Finding 9: There is a lack of internal controls at the JS to prevent the unauthorized disposition of records.

Applies to: the JS.

36 CFR 1236.10(b) requires the development of controls to protect records against unauthorized addition, deletion, alteration, use, and concealment.

While the JS RM Program is building a partnership with J6 that is encouraging as it helps with inclusion of recordkeeping when necessary in IT processes, it needs to strengthen the partnership with J6 to enhance their understanding of the legal responsibilities surrounding records alteration, deletion, retention periods and migration for long term preservation.

In interviews with JS program offices, one program office reported an instance where permanent and temporary records were deleted on their shared drive by IT without informing the program office or the JS Records Officer. The records were deleted because the shared drive was reaching capacity and more space was needed. According to the program office, attempts were made by IT to restore the records, but it was unsuccessful. An unauthorized disposition case was opened by NARA that led to an internal investigation and the recovery of the records. The report showed that IT moved the records to SharePoint, deleted the copies on the shared drive, but failed to notify the program office and the Records & Research Branch.

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[14] NARA Bulletin 2010-02: *Continuing Agency Responsibilities for Scheduling Electronic Records*, https://www.archives.gov/records-mgmt/bulletins/2010/2010-02.html, published February 5, 2010.

Recommendation 9: The JS, working with IT, must establish procedures and controls to ensure electronic records are maintained and accessible throughout their lifecycle, and deleted only in accordance with NARA-approved retention schedules. (36 CFR 1230.10(c))

<u>RECORDS DISPOSITION REQUIREMENTS</u>

Finding 10: Eligible permanent records are not being transferred to NARA.

Applicable to: All CCMDs, except AFRICOM, CYBERCOM, and NORTHCOM.

36 CFR 1226.22 and 1235.12(a) require Federal agencies to transfer permanent records to NARA when the records are eligible for transfer based on the transfer date specified in the NARA-approved schedule.

According to the NARA-approved schedules for the JS and CCMDs, all permanent records are to be transferred to NARA 25 years after the cut-off, after declassification review. Review of JS and CCMD transfer information, prior to the inspection, shows that the JS routinely transfers permanent records to NARA, and CENTCOM and TRANSCOM together made three pre-accessions of permanent records. CCMDs that were established less than 25 years ago, such as AFRICOM, CYBERCOM, and NORTHCOM, do not have permanent records that are eligible for transfer; but the other seven CCMDs are more than 25 years old with all showing no permanent records transfers except one made by CENTCOM in 2014.

Recommendation 10: The CCMDs must transfer eligible permanent records to NARA in accordance with Federal regulations and DoD directives. (36 CFR 1226.22 and 1235.12)

Finding 11: There is little or no disposition of electronic records located on shared drives.

Applicable to: JS and all CCMDs, except CENTCOM and NORTHCOM.

36 CFR 1226.10 requires the mandatory application of records dispositions in NARA-approved schedules.

The JS and all of the CCMDs, except AFRICOM and INDO-PACOM, have implemented records management applications (RMAs) to manage their electronic records. At the time of the inspection, AFRICOM was in the process of selecting an RMA, while INDO-PACOM had none and no plans to implement one. Some of the CCMDs, such as CENTCOM and NORTHCOM, have more advanced solutions integrating additional tools to their RMAs that can search SharePoint and designated shared drives to add tags and metadata to records prior to automatically moving the records into their RMAs.[15] For the JS and other CCMDs, this function is done manually relying heavily on personnel to perform this function and manually move their records into the RMA. Since all electronic records are created outside of the RMA and are stored in SharePoint and/or multiple shared drives, many records that are not moved to the RMA because of the manual burden, are left at risk and not properly managed.

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[15] CENTCOM and NORTHCOM reduced the number of shared drives in their CCMDs to centralize records in a pre-staging drive that is connected to their RMAs.

Recommendation 11: The JS and CCMDs must disposition electronic records on shared drives in accordance with NARA-approved schedules. (36 CFR 1226.10)

Finding 12: Some CCMDs lack clear responsibilities for the collection of historical records, which could result in the improper disposition of records.

Applies to: JS, CENTCOM, SOCOM, and SOUTHCOM.

CJCSI 5320.01C defines the document collection activities of JS historical programs. According to CJCSI 5320.01C the Joint History and Research Office (JHRO) will not maintain the official record copy of records collected and will defer to Information Management Division (IMD) on all records retention matters.

Within CJCSI 5320.10C, the relationship between CCMD Historians and CCMD Records Managers is also defined and places responsibility for coordination between the two functions on the CCDR to ensure that key records are organized and secured for the historical record. However, each function is to maintain its independence from the other. At some CCMDs, these lines have been blurred and are in need of review and clarification. For instance, the SOCOM History and Research Office is the designated proponent for capturing contingency operations records, not the CCMD Records Officer. The authority to capture contingency operations records was granted to the SOCOM History and Research Office by USSOCOM Directive 25-51 dated 17 October 2014. To date the SOCOM Historian has gathered 94 terabytes of operational information and is preserving and managing this information as a "history archive" on a secured drive. Information on this drive includes documents going back to World War II.

While the Historian has been given collection authority by USSOCOM 25-51, the CCMD CRM is still responsible for the management of all records within SOCOM ensuring compliance with applicable regulations. In discussions with the CRM and the Historian, it was difficult to determine what level of oversight and coordination was being exercised by the CRM concerning the capture and management of contingency operation records. It was not immediately clear whether the information gathered by the Historian constituted the record copy of all operational records in the AOR, or whether the record copy resided with the Commands and units in the AOR and the Historian was gathering duplicate copies of operational information to support the writing of command histories. There was also confusion as to how the records held by the Historian were scheduled, if they were the record copy, and whether they would be transferred to NARA if they were scheduled as permanent.

Finally, while it was apparent that the USSOCOM History and Research Office has established an excellent relationship with the CRM and operational units within the AOR, there appeared to be few formal procedures between the CRM, the Historian, and USSOCOM Knowledge Management personnel to address collection methods and correct problems if the Historian encountered a Command or Joint Task Force that did not properly administer contingency records. There also appeared to be no method for the Historian to notify the CRM upon reorganization, relocation, or inactivation of command or subordinate elements so that key records could be secured and preserved.

A similar collection situation was reported by the CENTCOM Records Manager who discovered 20 terabytes of Operation NEW DAWN records were inadvertently collected by the Historian's office and sent to the U.S. Army Center for Military History (CMH). USCENTCOM has coordinated with CMH to retrieve this data.

During the interview with the SOUTHCOM CRM, the inspection team was informed that the SOUTHCOM History and Research Office is responsible for the transfer of SOUTHCOM's permanent historical records to NARA, with no involvement by the CCMD Records Manager. The review of JS and CCMD permanent transfers, however, show no transfers made by SOUTHCOM (see Finding 10).

Recommendation 12.1: The JS and CCMDs must review current policies and procedures to ensure proper training, coordination, and clear lines of responsibilities between CCMD Historians and CCMD Records Managers. (36 CFR 1220.34(c))

Recommendation 12.2: The JS and CCMD Records Managers must notify NARA of any copies of records that are being maintained longer than the disposition of the record copy (36 CFR 1235.14)

Recommendation 12.3: The JS and CCMD Records Managers must transfer any permanent records contained in these collections where the record copy has not already been transferred to NARA. (36 CFR 1235.12)

ADDITIONAL CONCERNS and COMMON CHALLENGES

There are several areas of concern and common challenges that, while not covered under Federal regulations or NARA policy, have a significant impact on managing an effective RM program. Addressing these issues will improve the RM programs at the JS and CCMDs.

PROGRAM SUSTAINABILITY

The majority of the RM programs for the CCMDs are managed by one person with no other staff (see RM program profiles in Appendix A) and little or no contingencies for when the Records Manager is on extended leave, deployed, or other circumstances where the position becomes vacant. Only CENTCOM and NORTHCOM have additional RM staff or an alternate. Several of the CCMD Records Managers have been in the position for less than two years filling positions that had been vacant for a while. All CCMD Records Managers, in these circumstances, reported that they could not find any program information from their predecessor and had to rebuild the RM program from scratch. JS policy should contain program sustainability requirements, including but not limited to delegations of authority, contingencies for vacant positions that require records management activity to continue, and records of past RM program actions, operating procedures, training materials, program evaluations, and status reports.

PROGRAM COORDINATION

The inspection team found that while the JS Records Manager hosts quarterly meetings with the CCMD Records Managers to share challenges, solutions, and general information, there is a lack of cohesiveness, some miscommunication, and reluctance between the RM programs to share

program information. This is partially caused by distance, time zones, vacancies, and differences in CCMD missions and culture. There are many good practices in the JS and CCMDs that can be shared DoD-wide but are not shared internally. The JS and CCMD Records Managers should collaborate more and initiate working groups based on common RM strategic goals to address areas of noncompliance, common challenges, accelerate the re-establishment of some RM programs, and to improve the programs overall.

ELECTRONIC RECORDKEEPING

As mentioned in Finding 11, the JS and many of the CCMDs have implemented RMAs to manage their electronic records. The degree of implementation and effectiveness of the RMAs vary based on resources invested. Two of the more effective RMAs have automated some of the recordkeeping tasks integrating additional tools that connect to SharePoint libraries and/or designated shared drives, where most records are placed. These additional tools identify and prepare records prior to moving the records into the RMAs. The benefit of this automation reduces many of the manual tasks personnel need to perform before records are filed in the RMA. Other RMAs, in use at several CCMDs, do not use additional tools and require a lot of time-consuming manual tasks that personnel need to perform.

During the site visits, senior leaders and managers at the JS and some of the CCMDs voiced interest in automating much of the processes for managing electronic records with the goal of making it as seamless as possible for all users. The JS and CCMD Records Managers should collaborate more to identify and share their automated recordkeeping solutions and practices that work well and can be implemented where possible.

TASK MANAGEMENT

The JS uses the Joint Staff Action Package (JSAP) solution for task management within the JS Headquarters and many of the CCMDs. During the site visit to the JS, the inspection team received a demonstration of the tool's capabilities and how it has been integrated with the solution the JS uses to manage its electronic records. A lot of time, energy, and resources have been invested by the JS into the integration effort, to capture the full life-cycle of these electronic records, many of which are records of high-level officials that are permanent records. The integration efforts of the JS automates, to some degree, the manual process JS action officers must perform to file these records, and contributes to the JS meeting the OMB goal 1.1 in M-19-21 of managing permanent electronic records electronically by 31 December 2019.[16]

Within DoD, the Task Management Tasker (TMT) solution is widely used by DoD and its components for task management.[17] During the demonstration, the JS informed the inspection team, that the JS is being directed to switch to TMT, even though it does not offer any RM capabilities. NARA inspections of other DoD components, as part of the DoD Multi-Year Inspections Series, found that those using TMT have not integrated it with an RMA, and that the records in TMT are left unmanaged and at risk for unauthorized deletion. If the JS does switch to

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[16] OMB/NARA *Transition to Electronic Records* (M-19-21), https://www.whitehouse.gov/wp-content/uploads/2019/06/M-19-21.pdf, dated June 28, 2019.

[17] Task Management Tracker (TMT) is a DoD web-based solution that provides executive staff and action officers' task or suspense management. Tasks are assigned utilizing established organization workflow structure.

TMT, it will lose the RM capabilities it has invested in JSAP, and will need to reinvest in another integration effort to regain the capabilities, and to meet the M-19-21 goal it already achieved.

RECORDS OWNERSHIP

It was noted that records ownership at some of the CCMDs is a considerable common challenge that requires DoD-level involvement to overcome. The coalition and joint nature of the JS and CCMDs raises questions of records ownership and responsibilities in organizations and environments where CCMDs share missions with other nations (North American Aerospace Defense (NORAD) and North Atlantic Treaty Organization (NATO)), other DoD organizations (the Service Branches, National Security Agency (NSA), and Defense Intelligence Agency (DIA)), and other Federal agencies (Department of State (DOS), Department of Homeland Security (DHS), and others). There are instances when neither entity recognizes ownership of the records, and others where all entities claim ownership and responsibility for all of the records. Many of these coalition and joint partners have their own recordkeeping requirements established through official agreements, but not in all cases. While the NATO agreement was shared with the inspection team, other agreements for NORAD, and inter-agency and intra-departmental agreements were not available. The JS and CCMDs, working through DoD, should find and review the agreements to clearly delineate records ownership and responsibilities, and establish agreements as needed where none are in place.

During the 2019 War Records Workshop, CENTCOM established records definitions (e.g., joint, Service, SOF, and NATO) that can be a platform for the DoD, JS, and CCMDs to clearly delineate records ownership and responsibilities, and establish agreements as needed where outdated ones are in place.

EMAIL MANAGEMENT

Another considerable challenge common to the JS and CCMDs is with email management. The JS and all of the CCMDs, except CYBERCOM, INDO-PACOM and SOCOM, use the Defense Enterprise Email (DEE) system managed by the Defense Information System Agency (DISA). DEE was not designed with RM functionality, nor does it have the funding to upgrade the system to include RM requirements. While it does have the capability to journal email, there were a number of issues raised by the JS and the CCMDs involving the storage and retrieval of emails in DEE, some of which include:

- difficulty with obtaining discoverable email records as part of litigation and FOIA record searches:
  - inability to conduct pin-point searches of specific emails resulting in unorganized data dumps provided to requesters
  - same search criteria provides different results
  - lack of standardized tagging and metadata that impacts timely searches
  - encryption issues with emails from closed accounts;
- limited storage capability requiring users to create and place .PST files on network drives; and
- integrity concerns for journaled email accounts based on monthly variable swings in storage amounts.

DoD involvement may be needed to help resolve some of these issues as they are not only common to the JS and CCMDs, but also for other DoD components using DEE that NARA inspection teams have visited on other DoD inspections.

NOTEWORTHY PRACTICES

During the site visits, several noteworthy practices were found by the inspection team that would be of interest and benefit to the JS and CCMDs, as well as other DoD components and Federal agencies.

WAR RECORDS WORKSHOPS

"War records are the most essential records a DoD organization collects." CENTCOM COS 2018.

Since 2010, CENTCOM has coordinated efforts to obtain and manage war records from United States forces deployed in war areas. As part of this effort, CENTCOM hosts an annual War Records Workshop for Records Management (RM) professionals from the Joint Staff, all CENTCOM Service Component Commands (SCC), Joint Task Forces (JTF), Headquarters Directorate/Special Staff offices, and our North Atlantic Treaty Organization (NATO) partners. These workshops aid in advancing the RM mission across the CENTCOM Area of Responsibility (AOR) by ensuring the documentation, submission, and collection of War Records created throughout the AOR is clearly articulated and enforceable by all SCC and JTF RM professionals. Additionally, they provide a collaborative forum for creating courses of action to resolve guidance concerns governing War Records creation, retention, and collection; as well as the increasing technological challenges associated with the management of War Records. This forum encourages participants to share knowledge of best practices, which they could take back to their respective organizations. The continuation and expansion of these workshops is vital to the coordination and awareness of all Commands to manage, maintain, and preserve records created and received during contingency operations.

RECORDS MANAGEMENT APPLICATIONS

As mentioned above, CENTCOM and NORTHCOM have implemented RMAs in their CCMDs that are very effective in managing electronic records and reducing many of the manual tasks personnel perform to file their official records. In addition, both have reduced the number of shared drives where records were kept, and established effective business rules and training for personnel making use of their RMAs more successful.

TRANSCOM is in the process of transitioning to a cloud RMA solution that offers the same capabilities as CENTCOM's and NORTHCOM's solutions, and the JS has had similar success with its RMA, integrating it with its task management system to better manage those electronic records. Further integration of its RMA with other unauthorized repositories will help reduce risk to electronic records and increase the JS's ability to find relevant information for senior leaders more efficiently.

<u>**RESEARCH SERVICES**</u>

The Research Branch within the JS RM Program provides a valuable service throughout the JS Headquarters, and is an excellent example of incorporating RM into its KM services. The Research Branch is set up to find records requested from anyone in the JS related to action officer staff packages, litigation, FOIA, or any other official request.

<u>**DISPOSITION VALIDATION OFFICERS**</u>

NORTHCOM established a unique role for its RM program, the Disposition Validation Officer (DVO), which is assigned to senior personnel in each directorate, who is given the authority to approve disposals and validate the disposition of temporary records within their directorate. The DVOs use a Disposition Certification form that includes a report generated by the RMA Administrator identifying temporary records scheduled for disposition by that organization. Once temporary records are validated, the DVO completes, digitally signs, and returns the form to the RMA administrator for actual disposition. The establishment of this role has been very beneficial and effective for complying with the disposition of temporary records, providing 'checks and balances' for annual reviews for disposition.

CONCLUSION

The DoD JS and CCMDs have many RM challenges given the various missions of each Command and the complexity of the Department. The management of electronic records is one of its biggest challenges, along with establishing and maintaining effective RM programs with limited staff and resources. Practices for managing electronic records in several CCMDs is manually intensive. Despite the many challenges, this report includes several practices worthy of sharing within the other DoD components and Federal agencies, and internally that would benefit and improve the RM programs within the JS and CCMDs. Knowledge Management plays a very large role in the missions of the JS and CCMDs. Records management, when done well, facilitates the ability of the Knowledge Managers and others by ensuring that the most current and relevant information is at hand without searching through large volumes of duplicate and obsolete data.

The findings in this report identify the areas of noncompliance and its applicability to the JS and CCMDs. The recommendations in this report are made to correct areas in the RM programs that are not compliant or partially compliant, to minimize the risks to Federal records, and to ensure they are readily accessible to support mission-essential functions. They are intended to help the DoD JS and CCMDs comply with Federal RM statutes and regulations and ensure that the agency is accountable to Congress and the public. Follow-up actions required for the DoD JS, CCMDs, and NARA are included in Appendix D.

APPENDIX A
JOINT STAFF AND COMBATANT COMMANDS
RM PROGRAM PROFILE SUMMARIES

HEADQUARTERS JOINT STAFF

Applicable Findings and Recommendations: 2, 3, 4, 5, 6, 7, 8, 9, 11, and 12.

Staffing: The JS Records Officer has been in place for approximately two years, and has a team of seven RM staff members, and two additional staff supporting the Records & Research Branch. In addition, a network of Records Liaisons are assigned throughout the JS Headquarters, directorates and functional offices.

Program Summary: The JS program is continuing to modernize its program through a wide-variety of initiatives and plans begun in the past two years. All of these initiatives are important and interdependent, with some needing to be in place before others can be started or fully achieved.
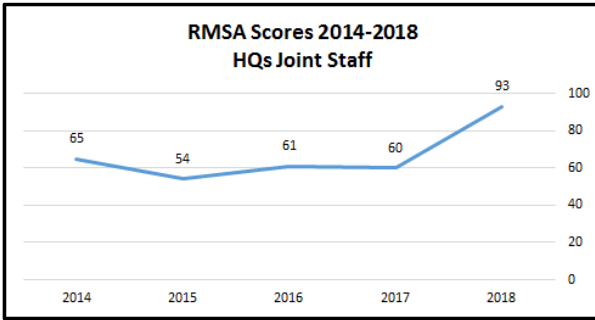
Recent Accomplishments: The RM program is well staffed and is adding additional positions to improve electronic records management and address program risks. In 2018, the Records & Research Branch was re-organized to align with 36 CFR compliance areas, establishing and assigning staff to eight program management areas, which allowed for the creation of project plans with milestones. The program management areas included:

- JS & CCMD Records Oversight and Compliance;
- Electronic Records;
- Essential Records;
- JS Electronic Records Application (Alfresco);
- Information Release and CAPSTONE +Plus (management of all media types for Capstone Officials);
- Role-based Records Management Training;
- Risk Officer; and a
- Records Research Lead.

In addition, data was utilized from previous JS RMSAs to identify RM program gaps, and in doing so, was able to increase the most recent JS RMSA score leading them out of the high-risk category. Another major achievement is the integration of JSAP with its RMA to gain control of important electronic records.

Specific Challenges: NARA Bulletin 2017-02: *Guidance on Senior Agency Officials for Records Management* states the SAORM must directly, and regularly, work with the ARO (and other appropriate officials) to oversee successful implementation of the agency's records management program. While the JS Records Manager did have direct access to the previous JS SAORM, it is no longer the case. In addition, a major setback is expected if the JS is forced to switch to a task management solution that has no RM capabilities.

Records Management Self-Assessment Scores: Federal Email Management Report Scores:

RMSA Scores 2014-2018
HQs Joint Staff

FEMR Scores 2016-2018
HQs Joint Staff
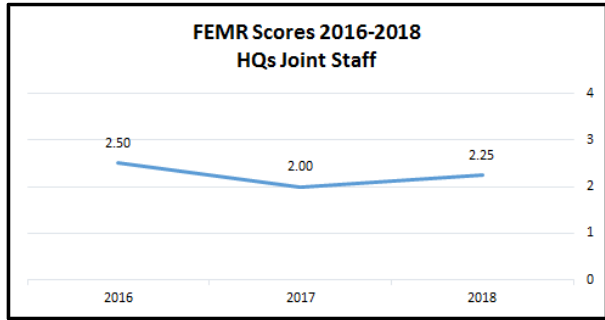
U.S. AFRICA COMMAND

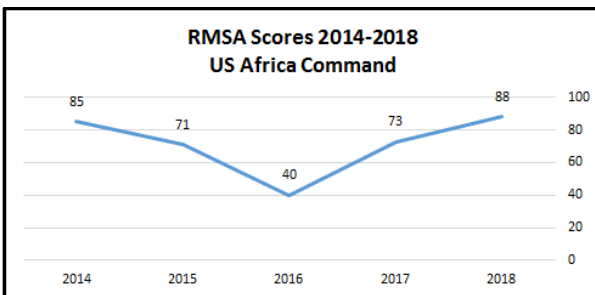Applicable Findings and Recommendations: 2, 5, 7, 8, and 11.

Staffing: The CCMD Records Manager has been in place for approximately two years, with no other staff assigned, but has a network of designated records officers assigned in the directorates and functional offices, and CCMD components.

Program Summary: AFRICOM is re-establishing their RM program that has been latent since 2010. The CCMD Records Manager has been using the 2017 AFRICOM Office of Inspector General (OIG) inspection report of the RM program to bring the program into compliance. Several projects are currently underway to achieve that goal.

Recent Accomplishments: The CCMD has moved to a mostly electronic environment where 98% of paper records have been digitized.

Specific Challenges: RM training of personnel assigned to components, where turn-over is very high, is difficult and time consuming.

Records Management Self-Assessment Scores: Federal Email Management Report Scores:

RMSA Scores 2014-2018
US Africa Command

FEMR Scores 2016-2018
US Africa Command
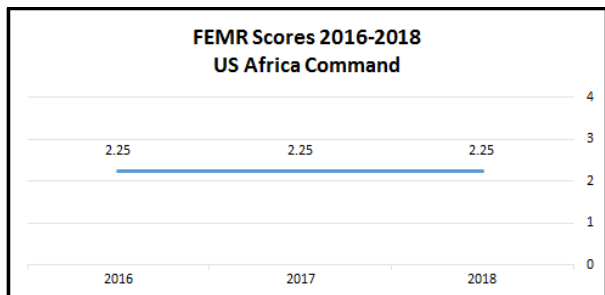
U.S. CENTRAL COMMAND

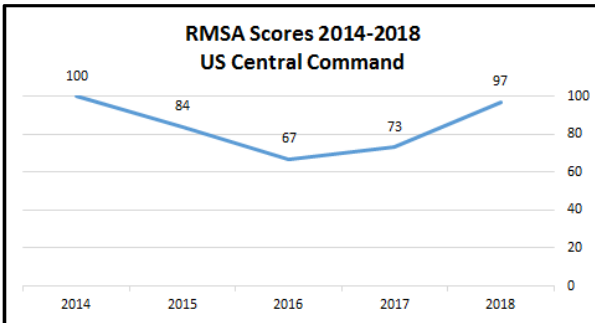Applicable Findings and Recommendations: 10 and 12.

Staffing: The CCMD Records Manager is currently on a one-year detail, with an Acting CCMD Records Manager filling in, and a team of four RM staff. There is also a network of designated records officers assigned in the directorates, functional offices, and CCMD components.

Program Summary: CENTCOM has a well-organized, mature RM program with several major projects in progress. The CCMD has established comprehensive policies and established effective RM practices that set a strong foundation for managing records and sustaining the program.
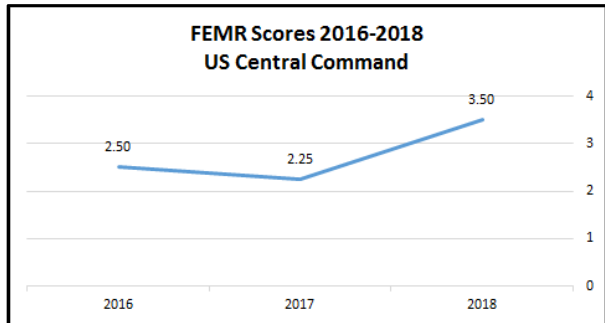
Recent Accomplishments: CENTCOM has several major achievements, including: the completion of major milestones for War Records Project that led to the CCMD receiving the 2018 DoD CIO Annual Award for Cyber and IT Excellence; the integration of its RMA with MicroFocus automating many manual tasks; and digitization efforts throughout 2014 to 2018 to reduce paper records.

Specific Challenges: Aside from the two common challenges listed above (records ownership and DEE), the Command has a lot of planning and work in the coming years to prepare large volumes of electronic records gathered as part of the War Project that will soon become eligible for transfer to NARA.

Records Management Self-Assessment Scores: Federal Email Management Report Scores:

RMSA Scores 2014-2018
US Central Command
100, 84, 67, 73, 97

FEMR Scores 2016-2018
US Central Command
2.50, 2.25, 3.50

U.S. CYBER COMMAND

Applicable Findings and Recommendations: 1 and 5.

Staffing: The CCMD Records Manager, at the time of the inspection, was in place less than a year, assigned four other additional duties, and had no other RM staff. There is a network of designated records officers assigned in the directorates and functional offices.

Program Summary: CYBERCOM was recently established in 2018 and is in the early stages of developing an RM program. It uses the JS RM instruction while its own RM policies are established, with guidance and assistance provided by the JS Records Officer. For this

inspection, CYBERCOM was included so NARA can explain the responsibilities of the CCMD Records Officer and the importance of an RM program to senior officials, and to determine if sufficient support is being provided at this critical stage as the program develops.

Recent Accomplishments: None at this time.

Specific Challenges: The storage of paper records is becoming an issue as file plans are being created for the various CCMD offices. In addition, records ownership issues exist between the CCMD and its host DoD agency (see Common Challenges above).

Records Management Self-Assessment Scores: Federal Email Management Report Scores:

              N/A New Command.   N/A New Command.

U.S. EUROPEAN COMMAND

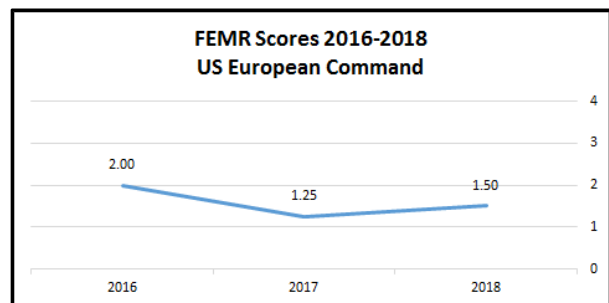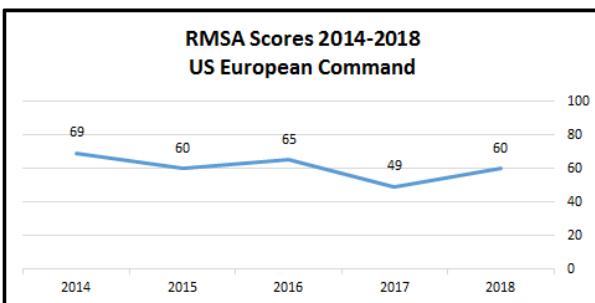Applicable Findings and Recommendations: 1, 2, 3, 5, 7, 8, 10, and 11.

Staffing: The CCMD Records Manager has been in place less than two years, is assigned one additional duty, and has no other RM staff. There is also a network of designated records officers assigned in the directorates, functional offices, and CCMD components.

Program Summary: The CCMD Records Manager began revamping the RM program since arriving in April 2018. Projects were initiated to revise and conduct training, and perform evaluations. The RM program is currently working on the transition of electronic records from shared drives to their RMA for the CCMD and its ODCs. But, progress is slow due to staffing where most time is spent keeping the program going.

Recent Accomplishments: RM training was revised and made available in JKO, and the partnership with the CCMD IG allows the CCMD Records Officer to visit and evaluate the ODCs.

Specific Challenges: Time to train personnel is especially challenging with new senior leaders not attending RM briefings, military personnel following their Service's policies and training for managing records, and overcoming language barriers when training foreign national personnel.

Records Management Self-Assessment Scores: Federal Email Management Report Scores:

RMSA Scores 2014-2018
US European Command
2014: 69, 2015: 60, 2016: 65, 2017: 49, 2018: 60

FEMR Scores 2016-2018
US European Command
2016: 2.00, 2017: 1.25, 2018: 1.50

U.S. INDO-PACIFIC COMMAND

<u>Applicable Findings and Recommendations</u>: 1, 2, 3, 5, 6, 7, 8, 9, 10, and 11.

<u>Staffing</u>: The CCMD Records Manager has been in place since 2009, with no other RM staff. In April 2013, the Joint Manpower Analysis Team (JMAT) performed a manpower evaluation on USINDOPACOM. According to the CCMD Records Manager, based on mission requirements, the JMAT recommended two CCMD Records Managers. The evaluation contained a recommendation for another position as a second records manager, and an observation of the current grade structure potentially being too low for technical records management and related areas. According to the CCMD Records Manager, his office and the Component Records Officers continue to be disproportionately manned.

<u>Program Summary</u>: This RM program has many areas of non-compliance. The program has consistently been at high-risk since NARA began the annual RMSA in 2009. Although high-risk, a noticeable upward trend started in 2012-2016 while under the Chief of Staff, but the RMSA scores started to decline, according to the CRM, after the program was relocated.

<u>Recent Accomplishments</u>: None at this time. A major accomplishment was made in 2014 when the CCMD funded a records project for three post-war organizations as part of Goal 2.2 of M-12-18, *Managing Government Records Directive*.[18] NARA's Records Management Consulting Services performed site assessments and gap analysis on permanent records 30 years or older to be either scanned as a separate project or transferred and shipped to the NARA. The components took action completing the recommendations in their respective reports.

<u>Specific Challenges</u>: The biggest challenge is that this RM program receives very little support from all levels, and the CCMD Records Manager is not given the resources, the authority, or the empowerment to make improvements and bring the program into compliance.
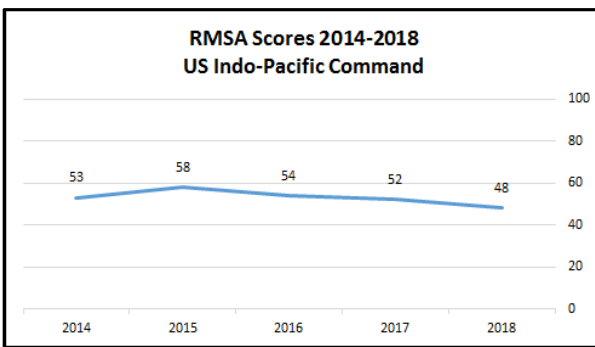
<u>Records Management Self-Assessment Scores</u>:   <u>Federal Email Management Report Scores</u>:

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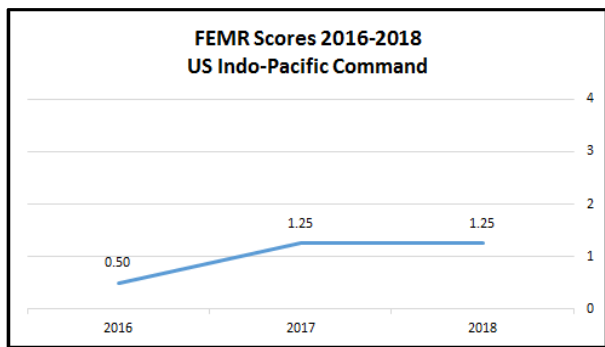
[18] Goal 2.2 of M-12-18, OMB/NARA *Managing Government Records Directive* states, "By December 31, 2013, the SAO shall ensure permanent records that have been in existence for more than 30 years are identified for transfer and reported to NARA."

U.S. NORTHERN COMMAND
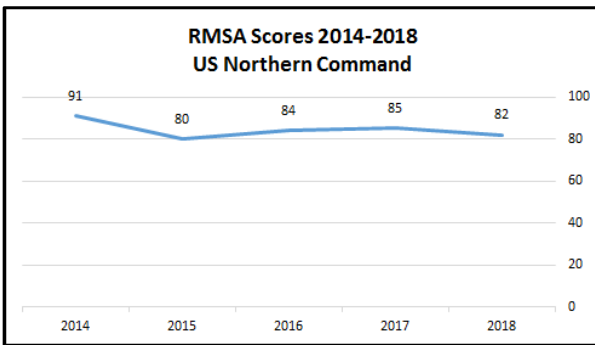
Applicable Findings and Recommendations: 2.

Staffing: The CCMD Records Manager has been in place for more than five years, with one other staff member assigned to manage the RMA and electronic records. NORTHCOM also has a network of designated records officers assigned in its directorates, functional offices, and components.

Program Summary: NORTHCOM is another CCMD that has a well-organized, mature RM program with several major projects in progress. It also has established comprehensive policies and established effective RM practices that set a strong foundation for managing records and sustaining the program.
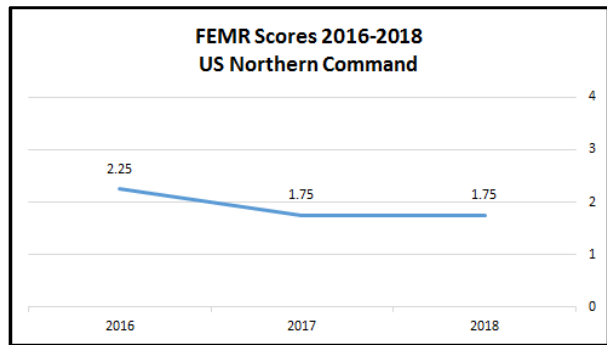
Recent Accomplishments: NORTHCOM has several accomplishments in the areas of training, evaluations, and information governance. The decommissioning of shared drives, as part of its records clean-up effort, enables the CCMD to reduce duplicate copies and obsolete records in preparation for transfer into its RMA, which contributes to better decision-making at all levels within the CCMD.

Specific Challenges: In addition to the two common challenges listed above (records ownership and DEE), the RM program lacks the funds needed to purchase software to better manage records in its SharePoint portal, and is awaiting updated policies and guidance from the JS (see Finding 3).

Records Management Self-Assessment Scores: Federal Email Management Report Scores:

RMSA Scores 2014-2018
US Northern Command

91   80   84   85   82

2014   2015   2016   2017   2018

FEMR Scores 2016-2018
US Northern Command

2.25   1.75   1.75

2016   2017   2018

U.S. SOUTHERN COMMAND

Applicable Findings and Recommendations: 1, 2, 3, 6, 7, 8, 10, 11, and 12.

Staffing: The CCMD Records Manager has been in place for less than two years, but departs in January 2020 as the position is a two-year term position. The RM program has no other RM staff assigned, but a network of records officers within the CCMD headquarters is in place.

Program Summary: The RM program is being re-established as the Records Manager position was vacant for a while. Many areas are partially compliant or not compliant.

Recent Accomplishments: The RM training was recently revised and made available in JKO.

Specific Challenges: The Records Manager in SharePoint is still being configured and not used at this time making it very difficult to manage the CCMD's electronic records. Another challenge is getting personnel to follow the JS and CCMD's RM policies and directives instead of their Service policies and directives.
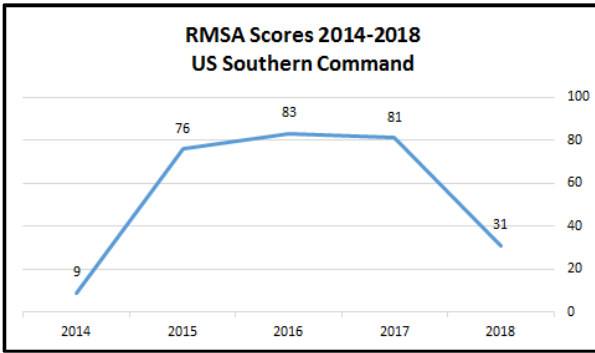
Records Management Self-Assessment Scores: Federal Email Management Report Data:
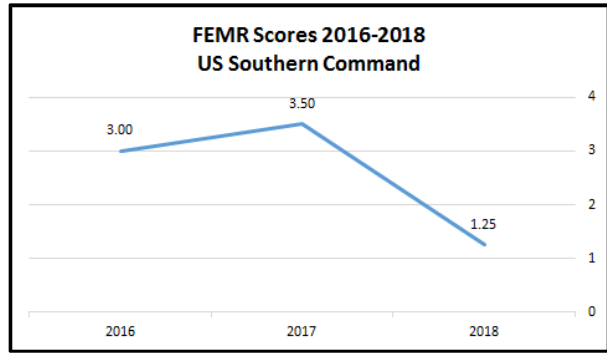
U.S. SPECIAL OPERATIONS COMMAND

Applicable Findings and Recommendations: 1, 2, 3, 5, 6, 7, 10, 11, and 12.
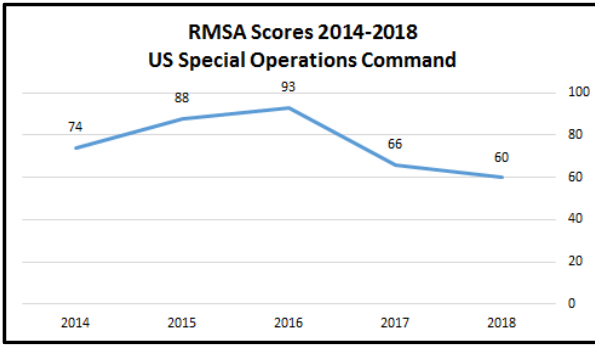
Staffing: The CCMD Records Manager has been in place for 17 years with one other RM staff member assigned (contractor) to support the management of electronic records for the RMA. There is also a network of records officers at the headquarters and its components.

Program Summary: Most areas of the RM program are maintained at a partially compliant level due to the lack of program resources.
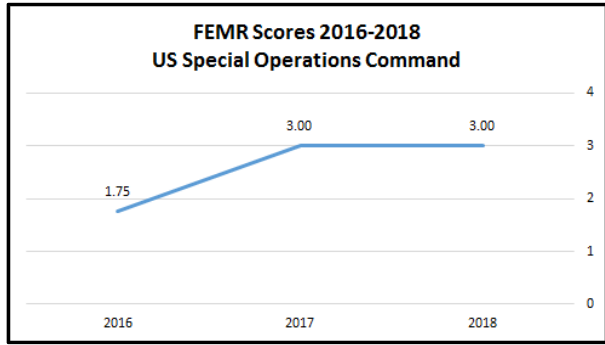
Recent Accomplishments: The e-mail e-vault project was recently completed where over 100,000 personal storage table files from e-vault were exported, and all the individual emails (over 60 million) were imported into SOCOM's RMA to ensure proper retention, disposition, and discover-ability. This included over 2,000 email accounts that contained operational/permanent records. In addition, the CCMD Records Manager and the KM Branch have a project that is in the early stages that will scan and identify old records and information that has not been used in more than a year to move into a cloud environment.

Specific Challenges: The biggest challenge is getting personnel to move their records from shared drives into designated SharePoint libraries that are set up as holding areas before the records are moved into their RMA.

Records Management Self-Assessment Scores: Federal Email Management Report Data:

RMSA Scores 2014-2018
US Special Operations Command

74 — 88 — 93 — 66 — 60
2014 2015 2016 2017 2018
(scale 0–100)

FEMR Scores 2016-2018
US Special Operations Command

1.75 — 3.00 — 3.00
2016 2017 2018
(scale 0–4)

U.S. STRATEGIC COMMAND

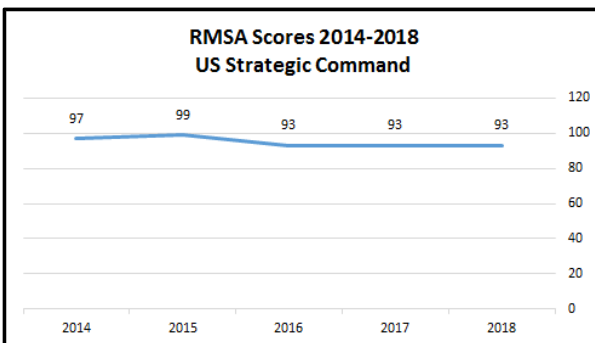Applicable Findings and Recommendations: 2, 6, 7, 8, 10, and 11.

Staffing: The CCMD Records Manager has been in place for approximately five years, with no other staff assigned, but has a network of records officers assigned in the directorates, functional offices, and its components.

Program Summary: Several program areas are compliant with improvements being made in other areas to increase compliance. The areas where improvements are being made apply mostly to the management of records in the CCMD's components where access is limited.
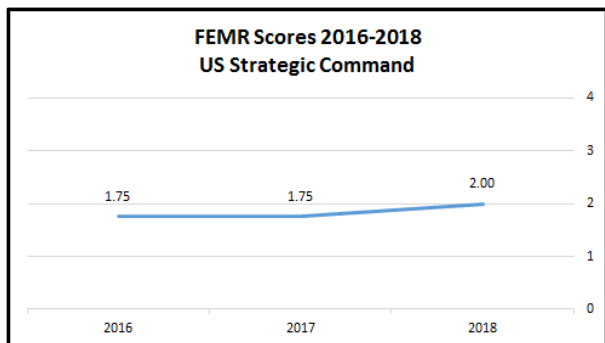
Recent Accomplishments: Effective business rules have been established to manage records through the use of current file plans to update their RMA, to create controlled shared drives to drag-and-drop records into the RMA, and to send end-of-year disposition taskers through the Chief of Staff's Office.

Specific Challenges: Travel to the CCMD components for conducting SAVs is limited. In addition, personnel assigned to the components cannot access the CCMD's RMA, making it more difficult to manage electronic records in the field.

Records Management Self-Assessment Scores: Federal Email Management Report Scores:

RMSA Scores 2014-2018
US Strategic Command

97 — 99 — 93 — 93 — 93
2014 2015 2016 2017 2018
(scale 0–120)

FEMR Scores 2016-2018
US Strategic Command

1.75 — 1.75 — 2.00
2016 2017 2018
(scale 0–4)

U.S. TRANSPORTATION COMMAND

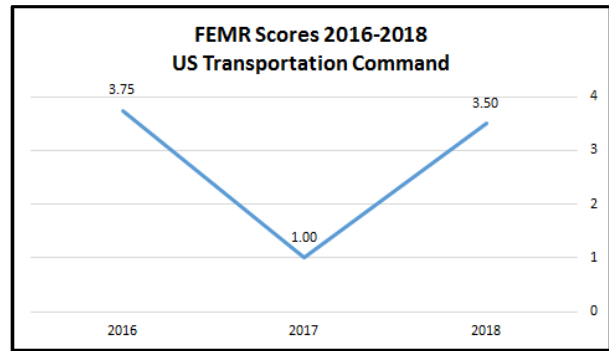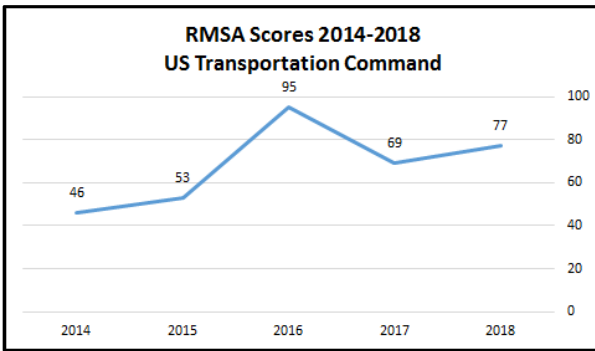Applicable Findings and Recommendations: 1, 3, 5, 6, 8, 10, and 11.

Staffing: The CCMD Records Manager has been in place since 2016, with no other staff assigned. There is a network of designated records officers assigned in the headquarters and in the CCMD's components.

Program Summary: A lot of progress is being made to bring partially-compliant and non-compliant areas into compliance. A major project is underway to replace the current RMA with a cloud version along with integrated tools to better manage electronic records.

Recent Accomplishments: RM training has been revised and made available in JKO, and role-based training is provided twice weekly to headquarters personnel. Digitization projects for active and inactive paper records were also recently completed. In addition, quarterly 'town hall' meetings are held with records officers to provide guidance and information.

Specific Challenges: Travel to the CCMD components for conducting SAVs is limited.

Records Management Self-Assessment Scores: Federal Email Management Report Scores:

RMSA Scores 2014-2018
US Transportation Command

FEMR Scores 2016-2018
US Transportation Command

APPENDIX B
INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine how well the DoD Joint Staff and Combatant Commands comply with Federal records management statutes and regulations and to assess the effectiveness of its RM policies and procedures.

METHODOLOGY

NARA carried out this inspection by visiting the Joint Staff Headquarters and four Combatant Commands, and interviewing Command Records Managers of the six Combatant Commands not visited. In addition, the inspection team:

- Reviewed records management policies, directives, and other documentation provided by the JS and CCMDs;
- Interviewed program staff at locations visited;
- Used a detailed checklist of questions based on Federal statutes and regulations, and NARA guidance; and
- Reviewed responses to current and past annual Records Management Self-Assessments (RMSA), Senior Agency Official for Records Management (SAORM), and Federal Email Management reports.

JS AND CCMD LOCATIONS VISITED

Headquarters, DoD Joint Staff	30 April - 2 May 2019
U.S. Cyber Command	1 May 2019
U.S. Northern Command	14 - 15 May 2019
U.S. Central Command	4 - 5 June 2019
U.S. Special Operations Command	5 - 6 June 2019

CCMD INTERVIEWS CONDUCTED

U.S. Africa Command	2 May 2019
U.S. European Command	8 May 2019
U.S. Transportation Command	9 May 2019
U.S. Southern Command	21 May 2019
U.S. Strategic Command	22 May 2019
U.S. Indo-Pacific Command	28 May 2019

APPENDIX C
RELEVANT INSPECTION DOCUMENTATION

The inspection team received and reviewed copies of the following documents from the JS and each of the CCMDs:

- JS and CCMD RM program organizational charts.
- RM program strategic plans, goals, and objectives.
- RM policies, directives, standards and other RM related tactics/issuances, including the handling of permanent records in all formats.
- RM policies for managing permanent and temporary email, to include the use of personal email accounts.
- RM policies regarding social media, to include authorized social media tools and procedures for capturing electronic records.
- Documentation of RM involvement in the approval and design of new systems and other decision making around systems changes including decommissions.
- Documentation of electronic RM objectives incorporated into agency information resource management programs and objectives.
- Plans for managing permanent electronic records in electronic formats by 31 December 2019.
- System documentation for Records Management Applications (RMA) planned or in use.
- Migration and metadata standards.
- Inventories of scheduled and unscheduled electronic systems.
- List of unscheduled records, to include electronic, special media, and paper records.
- Inspection or evaluation reports of RM practices within JS and CCMD programs and offices, subsequent reports, and/or follow-up actions, to include Inspectors General and Congressional reports related to the program.
- Documentation of RM training.

APPENDIX D
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)
- OMB/NARA *Transition to Electronic Records* (M-19-21)
- Other NARA Bulletins currently in effect - https://www.archives.gov/records-mgmt/bulletins

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. NARA provides additional policy and guidance to agencies at its records management website - http://www.archives.gov/records-mgmt/.

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)).

FOLLOW-UP ACTIONS

The JS will submit to NARA a Plan of Corrective Action (PoCA), to include applicable findings and recommendations applicable to the CCMDs, 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.

NARA will analyze the adequacy of the action plan, provide comments to the JS on the plan within 60 calendar days of receipt, and assist the JS in implementing recommendations.

The JS will submit to NARA progress reports on the implementation of the action plan until all actions are completed. NARA will inform the JS when progress reports are no longer needed.

APPENDIX E
ACRONYMS AND ABBREVIATIONS

AFRICOM	Africa Command
AOR	Area of Responsibility
ARO	Agency Records Officer
CCDR	Combatant Commander
CCMD	Combatant Command
CENTCOM	Central Command
CFR	Code of Federal Regulations
CIO	Chief Information Officer
CJCSI	Chairman of the Joint Chiefs of Staff Instruction
CJCS	Chairman of the Joint Chiefs of Staff
CJCSM	Chairman of the Joint Chiefs of Staff Manual
CMH	U.S. Army Center for Military History
CYBERCOM	Cyber Command
DEE	Defense Enterprise Email
DHS	Department of Homeland Security
DIA	Defense Intelligence Agency
DISA	Defense Information System Agency
DoD	Department of Defense
DoDI	Department of Defense Instruction
DOS	Department of State
DITPR	Defense Information Technology Portfolio Repository
DVO	Disposition Validation Officer
EIS	Electronic Information System
EUCOM	European Command
FEMR	Federal Email Management Report
FOIA	Freedom of Information Act
GRS	General Records Schedule
IG	Inspector General
IMD	Information Management Division
IM	Information Management
INDOPACOM	Indo-Pacific Command
IRM	Information Resource Management
IT	Information Technology
JKO	Joint Knowledge Online
JS	Joint Staff
JSAP	Joint Staff Action Process
JTF	Joint Task Force
KM	Knowledge Management

NARA	National Archives and Records Administration
NATO	North Atlantic Treaty Organization
NORAD	North American Aerospace Defense
NORTHCOM	Northern Command
NSA	National Security Agency
ODC	Offices of Defense Cooperation
OIG	Office of Inspector General
OMB	Office of Management and Budget
PoCA	Plan of Corrective Action
RM	Records Management
RMA	Records Management Application
RMSA	Records Management Self-Assessment
RO	Records Officer
SAORM	Senior Agency Official for Records Management
SAV	Staff Assistance Visit
SCC	Service Component Commands
SOCOM	Special Operations Command
SOUTHCOM	Southern Command
STRATCOM	Strategic Command
TMT	Task Management Tasker
TRANSCOM	Transportation Command
U.S.C.	United States Code