Defense Technical Information Center Records Management Program

Records Management Inspection Report

National Archives and Records Administration
May 4, 2018

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DEFENSE TECHNICAL INFORMATION CENTER
RECORDS MANAGEMENT PROGRAM

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.

In August 2017, NARA inspected the records management (RM) program of the Defense Technical Information Center (DTIC) 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 DTIC complies with Federal records management statutes and regulations and to assess the effectiveness of its RM policies and procedures. In particular it focused on the management of permanent electronic records, including email and social media communications. Additionally, it sought to identify practices of interest to other DOD agencies and the wider Federal records management community.

While many aspects of DTIC's records management program are compliant, there are areas of the program that are not fully compliant with various elements of 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B.[2] Failure to manage records in a fully compliant manner increases the risk that records will not be readily accessible for supporting DTIC's mission essential functions to DOD and other Federal agencies, and for accountability to Congress and the public. It also increases the risk of loss of Federal data and records and that permanent records may not be retained for eventual transfer to the National Archives, as required by 44 U.S.C. 3101.[3] To help mitigate the risks associated with being not fully compliant with 36 CFR Chapter XII, Subchapter B, this report makes 10 findings and 17 recommendations. Follow-up actions required for DTIC, DOD and NARA are included in Appendix C.

DTIC has provided a memorandum in response to this inspection. See Appendix E.

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[1] 44 U.S.C. Chapter 29, https://www.archives.gov/about/laws/records-management.html.
[2] 36 CFR Chapter XII, Subchapter B, https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title36/36CXIIsubchapB.tpl.
[3] 44 U.S.C. Chapter 31, https://www.archives.gov/about/laws/fed-agencies.html.

OVERVIEW OF THE DTIC RECORDS MANAGEMENT PROGRAM

DTIC's RM program is aligned under the Resource Management Directorate. The Records Management Officer (RMO), hereafter referred to as the Agency Records Officer (ARO), is a full-time employee and receives assistance from one other person, part-time, who provides continuity from previously assigned AROs. The DTIC RM program is unique within DOD in that it has appointed its own Senior Agency Official for Records Management (SAORM) at the component level, who is also the Deputy Administrator and the Chief Information Officer (CIO).

DTIC is a very small component of DOD with approximately 200 full-time employees and 100 contractors. The RM program is supported by the ARO who has been in place since 2014, and a network of six records custodians (RCs), one for each DTIC directorate. The RCs' RM duties are a collateral duty.

FINDINGS AND RECOMMENDATIONS

The DTIC RM Program has some positive RM initiatives and practices including senior leadership support, and demonstrable access and retrieval of their records that indicate a strong program. However, this report makes the following findings and recommendations noting specific areas of weakness and lack of full compliance with Federal records management regulations. For an overview of the methodology used for this inspection, please see Appendix A.

POLICY, DIRECTIVES, GUIDANCE AND MANUALS

Finding 1: The Records Manual is in draft form.

The Records Manual, DTICM 5015.02, dated July 2017, is currently in draft form undergoing internal review. The Manual is broken out into two volumes: "Records Manual" (Volume I) and "Electronic Records Management" (Volume II); both of which are comprehensive covering a wide range of RM topics including the management of email.

DTIC stated approval of the Records Manual was on hold to address an alternate method of using Personal Storage Table (PST) files for managing email, which the inspection team acknowledged and addresses in Finding 10. DTIC did indicate intent to finalize the Records Manual within six months.

To move the approval process forward, DTIC may wish to consider separating out the management of email into a standalone document so as to allow DTIC more time to assess current policy, or consider approving both volumes as is and update the current email language when a policy is agreed upon. Regardless of how it chooses to proceed in terms of its email solution, DTIC needs to finalize, approve, and formally issue the Manual for use by its staff and contractors.

Recommendation 1: DTIC must finalize, approve, and disseminate the agency's Records Manual. (36 CFR 1220.34(c))

Finding 2: DOD records schedules for Scientific and Technical Information records do not reflect current DOD policy and DTIC practices.

DTIC is charged with the implementation of the DOD Scientific and Technical Information Program (STIP). In accordance with Department of Defense Instruction (DODI) 3200.12, records from science and technology programs consisting of basic research, applied research, and advanced technology development are to be submitted by DOD components to DTIC for dissemination.[4] Additionally, DTIC also disseminates scientific and technical information (STI) from other Federal Government agencies, and is required by DODI 3200.12 to "preserve essential STI when organizational realignments, consolidations, and program cancellations eliminate the STI holdings of such activities."

The inspection team identified two DOD records schedules: N1-361-94-004, which states that the information contained in DTIC's STI database are permanent records; and N1-AU-86-010, which states the Army destroys its copy once DTIC enters the Army documents in its STI database. Both records schedules were coordinated with the designated DTIC ARO at that time prior to approval of the records schedules; and in the case of the Army records schedule, additional coordination was made with the DTIC director responsible for the DTIC database prior to approval of that schedule.

DTIC asserts they have no mission authority or responsibility to maintain STI material in accordance with Federal records management requirements. In accordance with DOD Manual (DODM) 3200.14, Volume 1, the records management responsibility for the copies of the documents that DTIC receives rests with the Head of the DOD Component.[5] Enclosure 2, paragraph 2k states, "The DoD Component heads... ensure that all records are maintained and managed in accordance with National Archives and Records Administration's approved dispositions to ensure proper maintenance, use, accessibility, and preservation, regardless of format or medium, as directed by DODD 5015.2 (Reference (n))." DTIC further asserts they were not party to any records schedules assigning DTIC responsibility for managing these records, and has not agreed to or received funding to handle this workload. Finally, DTIC asserts they have no means of ensuring the Services provide DTIC with the totality of their STI records.

NARA recognizes that agency policies and practices change over time which can affect the disposition of records in approved records schedules. NARA also understands DTIC's assertions, and that DOD must resolve the matter. However, the dispositions in the approved records schedules, while old, remain in effect until new records schedules are submitted to NARA in accordance with 36 CFR 1225.22 (d) and (e).

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[4] DODI 3200.12, *DOD Scientific and Technical Information Program (STIP)*, dated August 22, 2013.

[5] DODM 3200.14, Volume 1, *Principles and Operational Parameters of the DOD Scientific and Technical Information Program (STIP): General Processes*, dated March 14, 2014.

Recommendation 2.1: DTIC must coordinate with the DOD Records Officer and the DOD SAORM to issue guidance reminding all DOD components of their respective RM responsibilities for the official copies of STIP records and to update their records schedules for STI as needed. (36 CFR 1225.12(a))

Recommendation 2.2: The ARO must submit a new records schedule to NARA updating the disposition for the STI it is responsible for that reflects DOD policy and current DTIC processes. (36 CFR 1225.22)

Finding 3: DTIC policies and procedures for ingesting STI records lack specific RM requirements.

DOD Manual 3200.14, Volume 1, provides general principles, concepts, and procedural functions to ensure that DOD STI is appropriately managed and made accessible to authorized recipients. The Manual, however, lacks specific RM policies, procedures and required training to ensure the RM requirements of reliability, authenticity, integrity, and usability of STI records are established and implemented. DTIC provided the inspection team with a slide presentation that included a detailed tutorial on how a stakeholder/donor can submit documents to DTIC through the Enterprise Content Management System workflow, but it did not contain the level of detail needed to ensure STI records are properly managed and preserved.

Recommendation 3: DTIC, working with the Assistant Secretary for Defense for Research and Engineering (ASD R&E) and the DOD Records Officer, must plan, develop and implement necessary policies, procedures, and training for the STIP to ensure reliability, authenticity, integrity, and usability of STI records. (36 CFR 1220.34(c) and (f))

Finding 4: DTIC possesses potentially permanent and long-term temporary STI records on deteriorating media.

Federal regulations require agencies to maintain records for their entire lifecycle regardless of format or medium. DTIC's current recordkeeping practices are noncompliant with the storage and preservation requirements codified in 36 CFR 1222, 1236, 1237, and 1238.

DTIC stores STI records on microfilm, motion picture film, magnetic tape, silver halide negatives, and still photographs at the Washington National Records Center (WNRC) at Suitland, MD, and at its office location. DTIC informed the inspection team that these records are deteriorating. It is possible that the records on this media are the only remaining copies as DTIC is required by DODI 3200.12 to "preserve essential STI when organizational realignments, consolidations, and program consolidations eliminate the STI holdings of such activities."

As requests for STI are made, DTIC undertakes reformatting or other preservation actions. Without a more systematic approach to preservation, however, the remaining records are at risk of degradation to the point of being unusable. Once at this state, the records would need to be declared a loss and reported to NARA as an unauthorized disposal and/or loss of records.

DTIC has indicated intent to address the deterioration of technical reports on microform material as resources permit.

Recommendation 4: DTIC must conduct an inspection of the records stored at the WNRC to determine current condition, the extent of any deterioration, risk of further deterioration, whether or not any decaying records can be salvaged and provide written results to NARA. (36 CFR 1238.22)

Finding 5: Program offices are using a draft DTIC consolidated records schedule containing incorrect disposal instructions to dispose of its records.

The DTIC ARO has been developing a consolidated records schedule, DTIC 5015.2, to replace Supplement 1 to Defense Logistics Agency Regulation (DLAR) 5015.1, Records Management.[6] The consolidated records schedule incorporates new General Records Schedules (GRS) issued by NARA, and realigns functional series with DOD and the NARA GRS. It also updates their NARA-assigned Record Group (RG) from 361 to 569 (assigned in 2004), and condenses functional processes. An accuracy check of the disposition instructions of the first 33 items in the draft consolidated schedule showed that 7 are incorrect. Given the results of this accuracy check, the probability is high that more errors exist. Most of the records series in the draft consolidated schedule are covered by the GRS, but most of the errors found were GRS items superseded by new GRS items approved in 2016 and 2017.

While it is understandable that the document is still in a draft stage, it is of major concern that program offices are using this draft unapproved and inaccurate version to actively dispose of their records. Use of the incorrect dispositions may have already led to unauthorized disposals of temporary DTIC records, and will lead to more if this practice continues.

Recommendation 5.1: DTIC must remove all draft copies of the consolidated records schedule from internal shared drives and websites. (36 CFR 1225.10)

Recommendation 5.2: DTIC program offices must cease using the draft consolidated schedule for disposition purposes, and DTIC should issue guidance to all DTIC personnel that they must not use the draft consolidated records schedule for disposition purposes until a full accuracy check is performed, and it is finalized and officially released. (36 CFR 1225.10)

Recommendation 5.3: The ARO must conduct an assessment of program offices using the incorrect disposition instructions to identify and report any unauthorized disposals to NARA. (36 CFR 1230.10(a) and 1230.14)

Recommendation 5.4: The ARO must correct the draft consolidated records disposition schedule and submit it to NARA for approval. (36 CFR 1225.22(a))

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[6] DTIC 5015.2, *Records Management (RM) Schedule*, draft, dated September 2017.

Finding 6: Annual mandatory training for all staff and contractors is not comprehensive and does not include content specific to the practices and policies of the agency.

Federal regulations require agencies to provide records management guidance and training to all personnel (36 CFR 1220.34(f)). Further regulatory requirements state that employees be provided with "specific guidance" (36 CFR 1224.10(e)). In addition, NARA Bulletin 2017-01 requires that agencies develop RM training content "specific to the practices and policies of the organization," and DODI 5015.02 (Enclosure 2(3)(j)) requires that DOD components "augment the overview training with component-specific information."[7] In partial fulfillment of these requirements, DTIC has required that all DTIC staff and contractors take annually the Federal Records Officer Network (FRON) generic high-level RM course titled FRON RM 101. The content of this course, however, has not been customized to reflect the policies, procedures, or examples unique to DTIC as required by the CFR and DODI and as needed to make the training specific and relevant for all DTIC employees.

In addition, the training is missing key topics as specified in NARA Bulletin 2017-01. Some examples include the location of DTIC's records schedule and file plans, email management, information about procedures in the event of the loss or destruction of records, and agency RM program contact information. This training should be enhanced to ensure that all staff understand what is expected of them in relation to the records they create, receive, access, and use.

DTIC does provide additional RM training to the RCs so that they can effectively accomplish their RM responsibilities. The ARO has developed a method for providing the additional training that includes one-on-one training sessions to tailor the training to the specific needs of each RC. Feedback from the RCs revealed that this approach has proven to be effective.

DTIC has indicated intent to establish tailored annual mandatory training materials.

Recommendation 6.1: The ARO must update the RM training by incorporating the minimum required content areas specified in NARA Bulletin 2017-01. (NARA Bulletin 2017-01)

Recommendation 6.2: The ARO must update the RM training to include content specific to the practices and policies of DTIC. (36 CFR 1224.10(e), NARA Bulletin 2017-01, and DODI 5015.02 (Enclosure 2(3)(j))

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[7] NARA Bulletin 2017-01, *Agency Records Management Training Requirements*, https://www.archives.gov/records-mgmt/bulletins/2017/2017-01-html; and DODI 5015.02, *DOD Records Management Program*, February 24, 2015.

Finding 7: The ARO is not involved in the design, development, enhancement, or implementation of electronic information systems (EIS).

36 CFR 1236.6(b), Office of Management and Budget (OMB) Circular A-130, and DODI 5015.02 require the incorporation of RM requirements into the design, development, enhancement, and implementation of EIS.

DTIC Instruction (DTICI) 5015.1 requires that Information Technology (IT) Systems Program Managers involve the IT Records Custodian in the systems development process.[8] The ARO at DTIC does not participate in any of the IT processes or reviews related to the design and development of EIS. Her only involvement has been exploring the records management capabilities of Microsoft SharePoint to determine its use for DTIC records.

Involving the ARO early on in IT investment processes and reviews is critical for ensuring RM controls are established to ensure the reliability, integrity, usability, content, context, and structure of records and information in electronic systems (36 CFR 1236.10). It is also critical for bringing DTIC into compliance with 36 CFR 1236.6(b), OMB Circular A-130, and DODI 5015.02.

Recommendation 7: DTIC must update DTICI 5015.1 to include the requirement that IT System Program Managers include the ARO on the front-end of systems development processes. (36 CFR 1236.6(b) and 1236.10, OMB Circular A-130, and DODI 5015.02)

Finding 8: DTIC system program managers do not notify and involve the ARO when STI systems are decommissioned.

DTICI 5015.01 requires the IT Records Custodian, not the ARO, to be involved when systems are decommissioned and when records and data are migrated into new EIS. The ARO was involved in the migration of data from Microsoft SharePoint 2010 to 2013, and is currently collaboratively reviewing the RM component of SharePoint 2013 to determine if it meets DTIC's needs. However, the ARO has not been involved in or been made aware of the decommissioning of systems containing STI records.

The DTIC DROLS (Defense Research, Development, Test & Evaluation Online System) is currently scheduled as having permanent records according to DTIC records schedule N1-361-94-4. The CIO and ARO indicated that DROLS was decommissioned some time ago. It was later determined that the data was migrated twice into successor EIS.

Failure to notify the ARO when systems are decommissioned or migrated significantly increases the risk of unauthorized disposition or other mismanagement of records.

Recommendation 8.1: DTIC must update DTICI 5015.01 to include the ARO when systems are

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[8] DTICI 5015.1, *Records Management*, dated April 16, 2016.

decommissioned. (36 CFR 1230.10(c) and 1236)

Recommendation 8.2: The ARO must revise its records schedule for DROLS. (36 CFR 1225.10)

Finding 9: The ARO is unable to ensure that all of DTIC's electronic records in EIS are scheduled.

The ARO plays a critical role by scheduling all electronic records in DTIC EIS to ensure records are made available for DTIC business purposes, to ensure Federal records are managed according to Federal regulations, and to minimize risk of unauthorized destruction.

44 U.S.C. Chapter 35, Subchapter III, known as the Federal Information Security Modernization Act (FISMA), requires Federal agencies to develop and maintain an inventory of major information systems.[9] Section 3505(3)(C)(v) of FISMA and NARA Bulletin 2010-02 require this inventory be used as a source for the ARO to schedule electronic records.[10]

The ARO was unaware that all of DTIC's current information systems are available in a DOD information systems database used for tracking major EIS ("SnaP-IT") by the Information Technology Services Directorate. Due to this lack of information, the ARO has been using an old inventory list of DTIC information systems from 2009, manually updating it by contacting each program office. This practice hinders the ARO's ability to identify and schedule unscheduled electronic records.

Recommendation 9: The Information Technology Services Directorate must provide the ARO with access to a complete inventory of its information systems in order to schedule electronic records in EIS. (36 CFR 1236.26 and OMB Circular A-130)

EMAIL MANAGEMENT

Finding 10: Current email management practices and technologies do not secure all record email against potential loss.

DTIC's email system is Microsoft Outlook and is stored on the Defense Information Systems Agency's (DISA) Defense Enterprise Email (DEE) system email servers. DTIC, along with many DOD Components, use DEE for their email service. In October 2015, DISA began enforcing an Inbox storage limit of 512 MB for all basic users, and 4 GB for all business users. DEE customers that exceed their limit are advised to follow their Command's policy for storing email still required for business purposes.

DTIC does not have an email archive or recordkeeping system. The policy of DTIC, in compliance with 36 CFR 1236.22(c)(2)(f), largely has been to print email records and file them in accordance with their records control schedule or store them in PST files on DTIC individual personal or shared drives. While DTIC has historically stored email as PST files on individual

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[9] 44 U.S.C. Chapter 35, http://csrc.nist.gov/drivers/documents/FISMA-final.pdf.

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

hard drives or shared drives, the PST files of each staff person lack internal controls to properly manage risk of potential loss as each employee is responsible for managing these files. DTIC has recognized the risks of storing PST files on the personal or shared drives of DTIC staff and focused early on mitigating this risk for Senior Officials by contracting with DISA to journal these accounts as part of implementing its new Capstone records schedule approved in 2017. DISA, however, has yet to provide DOD components using DEE with a solution for managing the temporary email of DTIC's non-Capstone officials and staff.

NARA acknowledges that the storage of email in PST files on personal and shared drives is not specific to DTIC. NARA also understands that the limitations in DEE is an enterprise issue that may eventually be addressed by a DOD enterprise desktop solution that provides capabilities to electronically manage electronic records, as reported by DOD in their 2016 Senior Agency Official for Records Management Report and their 2016 Federal Email Management Report. The decision to use and store PST files on individual and shared drives, however, is a Component decision, not DISA's. In addition, the emails stored in DEE and on PST files belong to the respective DOD components and each DOD Component Head is required by DOD 5015.02, Enclosure 2, paragraph 3d, to "implement records management controls and accountability standards necessary to capture, manage, and preserve Component records, including electronic records and electronic mail and their attachments using internal controls." Furthermore, 36 CFR 1236.6(a) requires agencies to issue agency specific guidance for managing electronic records and email. RM policy, guidance, and internal controls are provided by the DOD Records Officer (RO) and DOD Component ROs, not the provider of the email service.

DTIC asserts the emails of non-Capstone officials are temporary and are deleted in accordance with the GRS or the previously approved records schedule under the 361 Record Group number. However, with the recent approval of DTIC's Capstone records schedule, the disposition instructions in the GRS and the previously approved Record Group 361 email records schedule no longer apply. The DTIC ARO is required to provide agency personnel with new implementing instructions for managing temporary email as part of the Capstone Approach, including when to dispose of email under their newly approved Capstone records schedule, and if the use of PST files is authorized and where to store them.[11] The RM Program has not issued policy, guidance, and training for staff on managing email as part of its new Capstone records schedule. DTIC should coordinate with the DOD SAORM and the DOD RO to obtain enterprise guidance for managing email in the DEE system, pending the DOD enterprise solution.

Recommendation 10.1: Pending the DOD enterprise solution, DTIC must plan, develop and implement necessary policies, procedures, and training to manage all agency email in a manner that ensures reliability, authenticity, integrity, and usability of email records. (36 CFR 1220.34(i))

Recommendation 10.2: Pending the DOD enterprise solution, DTIC should end its current practice of storing PST files on staff personal drives and shared drives, and migrate legacy email to an electronic records management system, so that DTIC can more effectively manage email consistent with their business needs and NARA regulations and policies.

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[11] NARA Bulletin 2014-06, *Guidance on Managing Email*, September 15, 2014.

RECORDS MANAGEMENT PROGRAM STRENGTHS

There are positive RM initiatives and RM practices of interest that other DOD and Federal agencies may find useful to implement within their programs.

SENIOR LEADERSHIP SUPPORT

The DTIC Administrator provides strong support for the RM program, and the DTIC SAORM and CIO is actively engaged with regular direct communication with the ARO. The Administrator and CIO are current in RM matters and available to provide policy as needed for the program and RM initiatives. Prior to the site visit, the Administrator sent a memo to all personnel in the agency reminding them of their RM responsibilities and to make themselves available to the inspection team to discuss RM.

NETWORK OF RECORDS CONTACTS

As mentioned earlier, the ARO is supported by a network of six records custodians (RCs), one for each DTIC directorate. Even though this is a collateral duty, having this network enables DTIC to comply with 36 CFR 1220.34(d). It enables the ARO to disseminate records management information throughout DTIC.

EVALUATION AND OVERSIGHT

The ARO has developed policies, procedures, and tools to conduct regular comprehensive inventories and evaluations of the records in all of its directorates. The ARO documents the results and conducts follow-up visits to ensure recommendations and improvements are made, making many of the corrections on the spot. This practice is a strength that would be of interest to other DOD components and Federal agencies.

CONCLUSION

The DTIC RM program has some areas of strength and successful RM initiatives that may serve as examples to other Federal agencies. However, while the DTIC RM program is functioning well in many ways, there are some areas of the program that are not fully compliant that elevate the risk that Federal records will not be available when needed. Of particular urgency is the need for the DOD to mitigate the risks to STIP records and the management of its electronic records including email. By making the improvements recommended in this report, the DTIC RM program will further strengthen its program and help the agency achieve its mission.

APPENDIX A
INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine how well DTIC complies 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 conducting interviews at DTIC Headquarters with DTIC RM and program staff and by reviewing DTIC's program documentation. More specifically, the inspection team:

- reviewed records management policies, directives, and other documentation provided by DTIC;
- interviewed RM representatives from the DTIC records management program;
- guided the course of the inspection using a detailed checklist of questions based on Federal statutes and regulations, and NARA guidance; and
- reviewed DTIC responses to current and past annual Records Management Self-Assessments (RMSA) and current and past reports of Senior Agency Official for Records Management (SAORM).

OFFICES VISITED

DTIC Headquarters, Fort Belvoir, VA, August 29-30, 2017:

- DTIC Agency Records Officer and Senior Agency Official for Records Management
- DTIC Records Custodians
- Enterprise Content Management Directorate (DTIC-C)
- Information Technology & Services Directorate (DTIC-T)

APPENDIX B
RELEVANT INSPECTION DOCUMENTATION

DTIC Instruction (DTICI) 5015.01, *Records Management*, dated April 16, 2016.

Draft DTIC Manual (DTICM) 5015.02, Volume 1, *Records Management (RM) Procedures Manual for Creating, Maintaining and Dispositioning the Defense Technical Information Centers (DTIC) Records. Volume 1 – Records Management, Disposition and Evaluation*, dated July 2017.

Draft DTIC Manual (DTICM) 5015.02, Volume 2, *Records Management (RM) Procedures Manual for Creating, Maintaining and Dispositioning the Defense Technical Information Center (DTIC) Records. Volume II – Electronic Records and Shipping Records,* dated July 2017.

Draft DTIC 5015.02, *Records Management (RM) Schedule*, dated September 2017.

DOD Directive (DODD) 5105.73, *Defense Technical Information Center (DTIC)*, dated May 2, 2013.

DOD Instruction (DODI) 5015.02, *DOD Records Management Program*, dated February 24, 2015.

DOD Instruction (DODI) 3200.12, *DOD Scientific and Technical Information Program (STIP)*, dated August 22, 2013.

DOD Manual (DODM) 3200.14, Volume 1, *Principles and Operational Parameters of the DOD Scientific and Technical Information Program (STIP): General Processes*, dated March 14, 2014.

Defense Technical Information Center: Traditional Resources and 21st Century Innovation, dated May 1, 2014.

DTIC Strategic Plan, 2017-2021, not dated.

DTIC Project Management Information Systems Handbook, Version 2.1, not dated.

DTIC Records Management Strategic Goals & Objectives, 2016-2017, dated April 7, 2016.

DTIC Federal Records Officer Network (FRON) 101 Training Employee Count, dated July 11, 2017.

Multiple DTIC RM Inventory and Assessments, dated 2015 and 2016.

Multiple DTIC File Plans and Inventory Plans, dated 2017.

DTIC Organization Chart, dated December 21, 2016.

Federal Records Centers of the National Archives and Records Administration, *Defense Technical Information Center, Record Group 569, Disposition Profile*, dated March 27, 2017.

DTIC Federal Email Management Report for 2016, dated March 17, 2017.

DTIC Records Management Self-Assessments for 2014, 2015, and 2016.

DTIC Approved Records Schedules.

APPENDIX C
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 Circular No. A-130 *Managing Information as a Strategic Resource*
- NARA Bulletin 2017-01 *Agency Records Management Training Requirements*
- Other NARA Bulletins currently in effect

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

DOD and DTIC will submit to NARA a Plan of Corrective Action (PoCA) that specifies how the agency will address each inspection report recommendation, including a timeline for completion and proposed progress reporting dates. The plan must be submitted within 60 days after the date of transmittal of the final report to the head of the agency.

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

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

APPENDIX D
ACRONYMS AND ABBREVIATIONS

ARO	Agency Records Officer
ASD R&E	Assistant Secretary for Defense for Research and Engineering
CFR	Code of Federal Regulations
CIO	Chief Information Officer
DEE	Defense Enterprise Email
DISA	Defense Information Systems Agency
DLAR	Defense Logistics Agency Regulation
DTIC	Defense Technical Information Center
DTICI	Defense Technical Information Center Instruction
DTICM	Defense Technical Information Center Manual
DOD	Department of Defense
DODD	Department of Defense Directive
DODI	Department of Defense Instruction
DODM	Department of Defense Manual
DROLS	Defense Research, Development, Test & Evaluation Online System
EIS	Electronic Information Systems
FISMA	Federal Information Security Modernization Act
FRON	Federal Records Officer Network
GRS	General Records Schedules
IT	Information Technology
NARA	National Archives and Records Administration
OMB	Office of Management and Budget
PoCA	Plan of Corrective Action
PST	Personal Storage Table
RC	Records Custodian
RG	Record Group
RM	Records Management
RMO	Records Management Officer
RMSA	Records Management Self-Assessment
RO	Records Officer
SAORM	Senior Agency Official for Records Management
STI	Scientific and Technical Information
STIP	Scientific and Technical Information Program
U.S.C.	United States Code
WNRC	Washington National Records Center

DEFENSE TECHNICAL INFORMATION CENTER
8725 JOHN J. KINGMAN ROAD
FORT BELVOIR, VIRGINIA 22060-6218

IN REPLY
REFER TO:

Mr. Laurence Brewer
U.S. Chief Records Officer
National Archives and Records Administration
700 Pennsylvania Avenue, NW
Washington, DC 20408

Dear Mr. Brewer:

Attached please find the Defense Technical Information Center's (DTIC) formal response to the subject line report for inclusion in the final published version. You will find this response to be consistent with my comments to date, namely that DTIC disputes all findings which concern or otherwise related to DTIC responsibility for DoD STI Records. I remain open to discussing this with you before you publish.

Regards,

Christopher Thomas
Administrator

Finding 2: DOD records schedules for Scientific and Technical Information records do not reflect current DOD policy and DTIC practices.

> Recommendation 2.1: DTIC must coordinate with the DOD Records Officer and the DOD SAORM to issue guidance reminding all DOD components of their respective RM responsibilities for the official copies of STIP records and to update their records schedules for STI as needed. (36 CFR 1225.12(a))

> Recommendation 2.2: The ARO must submit a new records schedule to NARA updating the disposition for the STI it is responsible for that reflects DOD policy and current DTIC processes. (36 CFR 1225.22)

DTIC Response:

NARA quotes Enclosure 3 to Instruction (DoDI) 3200.12 which speaks to preservation of STIP "when organizational realignments, consolidations, and program cancellations eliminate the STI holdings of such activities." DTIC concurs that our mission is the preservation and dissemination of STIP as a "library" however we do not concur that we are responsible for the preservation, scheduling, and retirement of STIP material to NARA as DoD records. Further, NARA has identified three records schedules established since the 1980s stating that DTIC manages [S&T] records for some of the Services thereby expanding DTIC's records management responsibilities to include STI holdings. The Army schedule indicates appears to obligate DTIC to keep work status reports; a product that DDRE eliminated 15 to 20 years ago. Since the Army is not sending those products the requirement appears to be not appropriate. Specific to the materials NARA has produced indicating DTIC concurrence to these responsibilities, the fact that in 1995 Chris Cupp, a staff-level employee, agreed the material was "useful" does not meet an RM threshold; and the fact that he agreed they would be kept permanently does not mean that they fall in the NARA record rule set. The other concurrence, on DTIC's behalf and also in 1995, was by Defense Logistics Agency (DLA) personnel in response to a GAO action, not NARA and not specifically concerning RM. We also wish to express our wholehearted belief that the handwritten note dated June 6, 1986 on the Faibisy memo indicating a need "to resolve definitively the issue of DTIC's records, both the ADP indexes it maintains and the microfiche copies of DoD Technical Reports which it disseminates." remains true 32 years on.

Finding 3: DTIC policies and procedures for ingesting STI records lack specific RM requirements.

> Recommendation 3: DTIC, working with the Assistant Secretary for Defense for Research and Engineering (ASD R&E) and the DOD Records Officer, must plan, develop and implement necessary policies, procedures, and training for the STIP to ensure reliability, authenticity, integrity, and usability of STI records. (36 CFR 1220.34(c) and (f))

DTIC Response:

DoD records management policy for all DoD records, including STIP, is articulated in DoDI 5015.02. DTIC has no mission authority, responsibility, or funding to maintain the STI records created in other DoD Components, in accordance with Federal regulations; the records

management responsibility for the copies of the documents that DTIC receives (ref. DoDM 3200.14, Volume 1 "Principles and Operational Parameters of the DoD Scientific and Technical Information Program (STIP): General Processes" dated 14 March 2014) rests with the Heads of the Components of the submitting agencies. Current DTIC organization, as a DoD Field Activity, was not party to any records schedules assigning DTIC responsibility for managing these records, does not recognize evidence that decades ago (reference Army agreement with NARA) while DTIC was under Defense Logistics Agency organization structure, was party to any agreement, and has not agreed to nor received funding to handle this workload. Finally, DTIC has no authority nor means of ensuring the Services provide DTIC with the totality of their [S&T] records up to SECRET; and DTIC does not operate at the TOP SECRET level. To simply say, tag you're it, because another part of the DoD stated such is simple but no meaningful in reaching the stated goal of NARA. If the goal is to get to goodness it needs to be addressed at a level where there is authority. DTIC has escalated this issue to DoD CIO and have requested NARA work the issue at the Office of the Secretary of Defense CIO level. We again believe the recommendation should reference DOD not DTIC.

Finding 4: DTIC possesses potentially permanent and long-term temporary STI records on deteriorating media.

> Recommendation 4: DTIC must conduct an inspection of the records stored at the WNRC to determine current condition, the extent of any deterioration, risk of further deterioration, whether or not any decaying records can be salvaged and provide written results to NARA. (36 CFR 1238.22)

DTIC Response:

DTIC does have plans to address the deterioration of technical reports on microform material as resources permit, but this is not DTIC record material and DTIC is not treating this as a RM concern as DTIC has no mission authority, responsibility, or funding to maintain the STI records created in other DoD Components, in accordance with Federal regulations; the records management responsibility for the copies of the documents that DTIC receives (ref. DoDM 3200.14, Volume 1 "Principles and Operational Parameters of the DoD Scientific and Technical Information Program (STIP): General Processes" dated 14 March 2014) rests with the Heads of the Components of the submitting agencies. DTIC was not party to any records schedules assigning DTIC responsibility for managing these records, and has not agreed to or received funding to handle this workload. Finally, DTIC has no authority nor means of ensuring the Services provide DTIC with the totality of their [S&T] records up to SECRET; and DTIC does not operate at the TOP SECRET level. DTIC has escalated this issue to DoD CIO and have requested NARA work the issue at the Office of the Secretary of Defense CIO level. We again believe the recommendation should reference DOD not DTIC.

Finding 5: Program offices are using a draft DTIC consolidated records schedule containing incorrect disposal instructions to dispose of its records.

> Recommendation 5.1: DTIC must remove all draft copies of the consolidated records schedule from internal shared drives and websites. (36 CFR 1225.10)

> Recommendation 5.2: DTIC program offices must cease using the draft consolidated

schedule for disposition purposes, and DTIC should issue guidance to all DTIC personnel that they must not use the draft consolidated records schedule for disposition purposes until a full accuracy check is performed, and it is finalized and officially released. (36 CFR 1225.10)

Recommendation 5.3: The ARO must conduct an assessment of program offices using the incorrect disposition instructions to identify and report any unauthorized disposals to NARA. (36 CFR 1230.10(a) and 1230.14)

Recommendation 5.4: The ARO must correct the draft consolidated records disposition schedule and submit it to NARA for approval. (36 CFR 1225.22(a))

DTIC Response:

The NARA inspection team obtained a copy of the draft consolidated records schedule from the NARA Appraisal Archivist assigned to DTIC with whom we have been working to update our consolidated records schedule. DTIC personnel are fully aware that the draft schedule may not be used before it is finalized which is precisely why DTIC did not provide the working draft to the inspection team.

Finding 7: The ARO is not involved in the design, development, enhancement, or implementation of electronic information systems (EIS).

Recommendation 7: DTIC must update DTICI 5015.1 to include the requirement that IT System Program Managers include the ARO on the front-end of systems development processes. (36 CFR 1236.6(b) and 1236.10, OMB Circular A-130, and DODI 5015.02)

DTIC Response:

The ARO is not involved in the design of systems which will contain copies of STI records created in other DoD Components as DTIC has no mission authority, responsibility, or funding to maintain the STI records created in other DoD Components, in accordance with Federal regulations; the records management responsibility for the copies of the documents that DTIC receives (ref. DoDM 3200.14, Volume 1 "Principles and Operational Parameters of the DoD Scientific and Technical Information Program (STIP): General Processes" dated 14 March 2014) rests with the Heads of the Components of the submitting agencies. DTIC was not party to any records schedules assigning DTIC responsibility for managing these records, and has not agreed to or received funding to handle this workload. Finally, DTIC has no means of ensuring the Services provide DTIC with the totality of their [S&T] records up to SECRET; and DTIC does not operate at the TOP SECRET level.

Finding 8: DTIC system program managers do not notify and involve the ARO when STI systems are decommissioned.

Recommendation 8.1: DTIC must update DTICI 5015.01 to include the ARO when systems are decommissioned. (36 CFR 1230.10(c) and 1236)

Recommendation 8.2: The ARO must revise its records schedule for DROLS. (36 CFR 1225.10)

DTIC Response:

The ARO is not involved in the decommissioning or migration of systems containing copies of STI records created in other DoD Components as DTIC has no mission authority, responsibility, or funding to maintain the STI records created in other DoD Components, in accordance with Federal regulations; the records management responsibility for the copies of the documents that DTIC receives (ref. DoDM 3200.14, Volume 1 "Principles and Operational Parameters of the DoD Scientific and Technical Information Program (STIP): General Processes" dated 14 March 2014) rests with the Heads of the Components of the submitting agencies. DTIC was not party to any records schedules assigning DTIC responsibility for managing these records, and has not agreed to or received funding to handle this workload. Finally, DTIC has no means of ensuring the Services provide DTIC with the totality of their [S&T] records up to SECRET; and DTIC does not operate at the TOP SECRET level.

Specific to Recommendation 8.2, the DTIC DROLS (Defense Research, Development, Test & Evaluation Online System) was decommissioned some time ago, and the STI contents were migrated into the successor EIS, however these contents are still not DTIC records.