



U.S. Department of Energy  
Office of Inspector General  
Office of Audit Services

# Audit Report

The Retention and Management of  
the Department's Records



## Department of Energy

Washington, DC 20585

April 15, 2005

### MEMORANDUM FOR THE SECRETARY

FROM:

*Greg Friedman*  
Gregory H. Friedman  
Inspector General

SUBJECT:

INFORMATION: Audit Report on "The Retention and Management of the Department's Records"

### BACKGROUND

On a daily basis, the Department of Energy creates huge volumes of records as a result of its wide-ranging activities, including those involving science, defense and the environment. These records provide a critically important knowledge base that can be drawn upon by Department officials, researchers, historians, and others. To address the myriad of issues relating to its records inventory, the Department is required to establish and maintain an effective records management program. According to the National Archives and Records Administration, such a program is the key factor in preserving the information needed by an agency to accomplish its mission and to maintain the history of the organization.

The Office of the Chief Information Officer has overall responsibility for the Department's records management program, including establishing policy and providing guidance. Each of the Department's organizations is responsible for creating, identifying, maintaining, retrieving, and disposing of records when no longer needed. Because of the importance of these issues, we initiated this audit to determine whether the Department effectively managed its records.

### RESULTS OF AUDIT

The Department's program to retain and dispose of its records inventory was not always operated efficiently and effectively. Specifically, we found that the Department:

- Had not developed and implemented methods for archiving e-mail and other electronic information in its original form; and,
- Had not adequately planned for scheduling and disposition of records, including those related to environment and health, held at its closure sites.



Further, we noted that the Department and its many components maintained a number of document management and tracking systems that performed essentially the same function.

We found that the Department had not adopted a comprehensive records management program. In particular, the Department had not fully developed and implemented a policy to meet National Archives and Records Administration requirements governing records management nor had it placed sufficient management emphasis on ensuring that records were adequately maintained. Further, we noted several discrete records management program areas that could be re-engineered to achieve significant operational economies. For example, the Department could save over \$2 million by eliminating duplicative and redundant records management systems. Further, by placing greater emphasis on the storage of "hard copy" records in electronic form, the Department could gain additional savings. Similar actions are being aggressively pursued in the private sector and would, in our judgment, greatly benefit the Department's complex organizational structure.

During our audit we learned that the Department is in the early stages of planning a corporate system to link records management across the complex. Expected benefits include reduced costs and increased efficiency by eliminating redundant systems and duplicative efforts. While this effort is encouraging, plans for this system are not complete, its development is not fully funded, and it will integrate, but not necessarily eliminate, duplicate systems. In this connection, we have made several recommendations designed to improve the overall efficiency and effectiveness of the Department's records management program.

#### MANAGEMENT REACTION

Management agreed with the recommendations and, in many instances, stated it had initiated a number of corrective actions. Management also shared many of our concerns on records management and generally agreed with the facts presented and conclusions reached in the report. Management comments are contained in Appendix 3.

Attachment

cc: Deputy Secretary  
Chief of Staff  
Administrator, National Nuclear Security Administration  
Under Secretary for Energy, Science and Environment  
Chief Information Officer

# **REPORT ON THE RETENTION AND MANAGEMENT OF THE DEPARTMENT'S RECORDS**

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# RETENTION AND MANAGEMENT OF THE DEPARTMENT'S RECORDS

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## Managing Records

The Department of Energy (Department) did not effectively manage the retention and disposition of its records.<sup>1</sup> Specifically, the Department did not always ensure that essential electronic records, especially electronic mail (e-mail), were appropriately retained. Additionally, the Department maintained multiple document and tracking systems that performed essentially the same function, and had not adequately planned for the scheduling and disposition of records at its closure sites.

### Electronic Records Management

The Department had not effectively managed many of its electronic records. The majority of the Department's records originate in an electronic form and many must be preserved for future business operations. We identified issues with e-mail and other electronic information, as well as system development records management requirements.

Even though e-mail has become a predominant method of conducting business in the Department, only 1 of the 12 sites we reviewed maintained a records system for managing such information. While many e-mails do not contain policy or communications worthy of retention, many others do and must be preserved as part of the Department's system of records. Furthermore, we found 6 of 12 sites reviewed did not provide guidance on retaining e-mail. Additionally, 5 of 12 sites instructed employees to print out and retain hard copy documents of e-mail – a costly and antiquated method of records retention.

Additionally, 11 of 12 sites included in our review did not have systems to schedule and dispose of other electronic information. The 11 sites printed out and retained paper copies as the official record, thus increasing the cost of records retention. While Department officials have encouraged the use of electronic records management systems - systems that facilitate preservation, retrieval, use,

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<sup>1</sup> *Federal Records Act* (44 U.S.C. 3301) defines records as follows: "Records include all books, papers, maps, photographs, machine readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them."

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and disposition of records - only one site we reviewed had such a system. Furthermore, many sites we visited employed document management systems that would store electronic documents until they would ultimately be printed for archiving.

Finally, the Department had not integrated records management requirements into its information system development process. For example, one site incurred additional costs to print and scan documents into an electronic environmental, safety and health database because the system did not allow the information to be imported in its original, electronic form. Both the National Archives and Records Administration (NARA) and the Office of Management and Budget have established that records management requirements should be built into all information systems. These requirements include the ability to identify, schedule, maintain, and dispose of electronic records. Specifically, NARA requires that agencies incorporate data disposition instructions into the system's overall design. Department officials informed us that the Corporate Human Resource Information System is the only corporate system that has been designed to properly maintain and schedule the disposition of the electronic records it creates. All other corporate systems developed by the Department had not incorporated records management requirements at the time of our review.

#### Document Management and Tracking Systems

Several of the sites maintained multiple document management systems that stored electronic records and tracking systems to track paper records that performed essentially the same function. For example, the Oak Ridge Reservation (Reservation) maintained multiple document management systems capable of storing electronic records, but not scheduling or disposing of them. This site also maintained multiple tracking systems that identified the location of paper records. Specifically, the Reservation maintained six document management systems and four tracking systems costing over \$1.7 million per year to operate and maintain. The East Tennessee Technology Park had four of these systems at the Reservation, each for a different organization. Our findings in this area are consistent with a recent Department study on records

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management systems that concluded there were numerous duplicative records management systems across the complex that keep multiple copies of the same document and do not share information.

#### Closure Site Issues

The Department had not adequately planned for scheduling and disposition of paper records at its closure sites. For example, at the time of our review, the Fernald site had approximately 18,500 boxes of unscheduled records that it may not be able to properly schedule and archive prior to the 2006 site closure. Although the majority of Fernald records were scheduled, NARA officials informed us that a recent review of the site estimated that almost half of the records were scheduled incorrectly. For example, records with different retention periods were stored within the same box or, in other cases, the description of the records was found to be inadequate for identification purposes.

Other closure sites have also identified issues related to the retention and timely disposition of its paper records. For instance, the only significant Environmental Management site that has been closed, Pinellas, had numerous difficulties in managing its records upon closure, including scheduling records for disposal. Ensuring adequate retention of records is particularly critical at closure sites due to the potential of long term environmental and health concerns and the increased risk that the Department would not be able to readily find records important to the health of former employees.

#### **Records Management Program**

Problems we noted during our review occurred because the Department had not developed and implemented an adequate records management policy or placed sufficient emphasis on this mission support activity.

#### Records Management Guidance

Although the Office of the Chief Information Officer (CIO) recently developed draft policy to support a comprehensive records management program, the policy lacks specificity. For example, it does not establish a requirement for retaining electronic records, including e-mails, in their original form, or for including records management in the

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life cycle of information systems. In addition, specific guidance is needed to establish a corporate solution for establishing records management systems to prevent the development of duplicate records management systems. After the completion of audit field work, CIO officials informed us that a records management manual designed to implement current policy was being developed. The to-be-completed manual is to include chapters on electronic records and e-mails.

#### Senior Management Attention

Based on our conversations with site and program officials, we learned that records management at the Department is generally perceived as a low priority and has not received sufficient senior management attention. For example, in June 1999, the Office of the CIO initiated a pilot project to develop a corporate e-mail records management system. Although the pilot was completed, the initiative was never fully developed or rolled out agency-wide. Despite the expenditure of over \$350,000, the pilot project was terminated after two years of effort. In addition to technical and functional issues that impacted complex-wide implementation, CIO officials cited higher priorities as a barrier to implementation.

In a recent study conducted by NARA, lack of senior management emphasis on records management within the Department was also cited as a factor in poor records management. The report, which included several agencies, cited the lack of involvement or influence by the senior records managers on programmatic business processes or the development of information systems designed to support them. In light of this finding, NARA recently issued guidance recommending that agencies elevate the position of agency senior records managers to report directly to the CIO in order to increase their visibility and authority. Currently the senior records manager at the Department reports to the Associate CIO for Business and Information Management. A NARA official suggested that elevating this reporting relationship has improved records management at other agencies.

#### **Department's Records at Risk**

Without improvements to its records management program, the Department is at risk of losing vital



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information and expending more than necessary to maintain its records. The loss of information is particularly critical at closure sites due to their need to retain records for environmental and health concerns. In addition, should these documents become lost or misplaced, reconstruction could be costly to the Department. For example, a survey in a recent information technology trade publication estimates that the average cost to recreate a single lost document is \$180.

The need to efficiently manage electronic records was recently demonstrated by the Department's effort to populate the Nuclear Regulatory Commission's Licensing Support Network as part of its effort to license the Yucca Mountain disposal project. As we reported in *Management Controls Over the Licensing Support Network for the Yucca Mountain Repository* (OAS-M-04-04, May 2004), employees were required to manually review, classify, and catalogue millions of e-mail messages prior to posting them to the licensing network. At the time of the review, about 6.4 million e-mails remained unprocessed due to the lack of system requirements for archiving e-mail records.

Conversion of e-mail records to hard copy may also pose problems for the Department in future legal proceedings. Specifically, a court ruling on computer data determined that an e-mail converted into hard copy was not considered to be properly preserved. The court stated that records need to be preserved in their original or identical form, to include logs and other information contained within an e-mail. Additionally, a recent Government Accountability Office report on electronic records stated that e-mails may contain multiple attachments linked within the message which cannot be readily converted to paper or text formats without the loss of context, functionality, and information.

The Department is also incurring increased costs to store paper records that were originally in electronic form. Despite the growth in generating electronic records, the Department continues to store over 820,000 cubic feet of inactive paper records at multiple locations. We found paper records storage costs in excess of \$9.50 per cubic foot while the cost of storing records in an electronic form would be considerably less.

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Savings could also be realized by consolidating the Department's records and document management systems. For example, the Richland Site recently integrated 12 records management systems into a single electronic records management system and projected over \$6 million cost savings. The Department estimates that it can achieve additional savings in excess of \$2 million by adopting a corporate approach to consolidate records management systems and eliminate future development of redundant systems across the complex.

**RECOMMENDATIONS**

To improve records management across the complex, we recommend that the Chief Information Officer, in conjunction with the National Nuclear Security Administration and cognizant program officials:

1. Develop and finalize detailed policy and implementing guidance to support complex-wide records management policy. Such guidance should address requirements for:
  - a. storing electronic records, managing e-mail, and incorporating records management into the system life cycle; and,
  - b. a corporate solution to eliminate duplicate systems and consideration of existing systems when approving new records management projects.
2. Review the organizational placement of the senior records manager to ensure that the position has sufficient authority to include responsibility for leading, planning and managing the Department/Agency records management program.

**MANAGEMENT REACTION**

Management generally concurred with the findings and agreed with the recommendations presented in the report. Management noted the implementation of records management is decentralized within the Department and that the elimination of duplicate systems is a complex issue.

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Management stated that the Office of the CIO began in Fiscal Year 2005 to address e-records requirements through the Capital Planning and Investment Control (CPIC) process, the approval and funding mechanism for technology investments. The Office of the CIO also indicated the office does not have the authority to dictate program records activities.

Management asserted that OMB has not required that records management be built into all information management systems and noted that our report was only partially correct in three areas discussed below.

First, management acknowledged that sites may maintain multiple records management systems as was the case at the Oak Ridge Reservation, but noted that our conclusions related to duplicate systems was only partially correct. Management added that the existence of duplicative systems was a program, contractor, and funding issue. Specifically, Management stated that the Oak Ridge Reservation operates projects for every DOE Program Element, using different contractors and funding sources for each. Additionally, funding is not usually provided in the new contract for management of existing systems and/or migration to new systems. However, Management agreed that savings may be possible from the elimination of duplicate systems.

In addition, Management stated our conclusion regarding the inadequate disposition of paper records at closure sites was only partially correct. Management stated that disposition schedules have been developed, approved by NARA, and placed on the Office of CIO website. Management explained that the Fernald records management problem is a common one for closing sites. Furthermore, Management stated that the Pinellas site closure occurred in 1993 and the disposition schedule for environmental records was not approved by NARA until May 2000. Additionally, trained, experienced personnel leave closure sites as soon as possible and, since records disposition is one of the functions that is active until and after closure, remaining and often inexperienced individuals are assigned these responsibilities.

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Finally, Management stated that our conclusion that the Department is at risk of losing vital information also was only partially correct. Management explained that continued storage of paper is an issue not easily resolved because of moratoria on litigation, worker safety and health, and epidemiology records. Specifically, some sites have determined that once the moratoria are lifted, the records can then be destroyed and it may not be worth the expenditure to scan older records or try to manage them electronically. Additionally, Management agrees that a consolidated approach to records management will address the problems of records storage. To address closure site issues, the Office of Legacy Management (Legacy Management) is currently building a centralized storage facility and has established an information system for storing e-records.

Management's comments are included in their entirety in Appendix 3.

Legacy Management also provided comments on our report on March 17, 2005, separate from the Department's consolidated response. Legacy Management agrees that records management requirements need to be addressed in Departmental policy and that closure site records management processes are lacking. Legacy Management had several concerns with the conclusions in our report including:

- The report does not address the Department's management of classified records;
- The Department is not, in fact, in the early stages of planning a corporate system to link records management across the complex; and,
- The closure site contracts do not include specific records management clauses.

**AUDITOR COMMENTS**

We consider Management's comments and planned action to be responsive to the recommendations. Contrary to Management's assertion that OMB does not require records management be built into systems, we noted that OMB Circular A-11 instructions for preparing business cases for information systems require agencies to address "*...how the system will manage the business information (records) that it will contain throughout the information life cycle.*"

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With regard to the areas that Management considered to be partially correct, in subsequent conversations with Management, the Departmental Records Officer explained that the Department generally agreed with our conclusions in the report and sought no changes to the report language. Management indicated that it noted that the report was only partially correct to highlight additional information and causes not cited in the report. Management officials told us that the additional comments were not meant to dispute any of the facts presented in the report.

As to duplicative systems being a program, contractor, and funding issue, we agree and believe that guidance to move the Department toward a corporate solution for records management should help eliminate the existence of multiple document management and tracking systems across the Department. Although we cite the Oak Ridge Reservation as our example in the report, we found the same issues at other locations with multiple co-located organizations. Further, we agree that a corporate solution would eliminate the need for stand-alone, site-specific systems, such as the ones at the Oak Ridge Reservation.

We recognize that the Department has made progress with managing records at closure sites, but several problems still exist. We agree that trained, experienced personnel leave as soon as possible at closure sites and believe this adds to the urgency for the Department to act, since records disposition is one of the functions that is active until, and after, closure.

We agree with Management's comments drawing attention to the fact that the risk of losing records from closure sites is particularly urgent and its explanation that continued storage of paper is an issue not easily resolved because of moratoria on litigation, worker safety and health and epidemiology records. While we do not propose scanning and maintaining electronic copies of existing paper or legacy records, we do believe that future management of records electronically would cost considerably less than maintaining paper copies.

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With regard to Legacy Management's comments, while our review primarily focused on unclassified records, we did not exclude classified records from the scope of our audit. While Legacy Management disagrees that the Department is in the early stages of planning a corporate records management system, our review found that the Department's eContent Management System, currently in the planning phase, is intended to modernize and integrate, among other things, the Department's electronic records and document management. While we understand Legacy Management's concern, our review of the Fernald contract confirmed that the contractor was required to comply with all Department directives and guidance, including those on records management.

## Appendix 1

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### OBJECTIVE

The objective of this audit was to determine whether the Department effectively managed its records.

### SCOPE

The audit was performed between October 2003 and December 2004 at Department Headquarters in Washington, DC; the Oak Ridge Reservation in Oak Ridge, TN; the Los Alamos National Laboratory in Los Alamos, NM; the Sandia National Laboratory and the National Nuclear Security Administration Service Center in Albuquerque, NM; the Miamisburg Closure Project in Miamisburg, OH; and the Ohio Field Office and Fernald Closure Project in Springdale, OH. We also obtained information from the Kansas City Site Office and the Kansas City Plant in Kansas City, MO. Although our review primarily focused on unclassified records, we did not exclude classified records from the scope of our audit.

### METHODOLOGY

To accomplish our objective, we:

- Reviewed applicable laws and regulations pertaining to retention and management of records;
- Reviewed the *Government Performance and Results Act of 1993* and determined if performance measures had been established for retention and management of records;
- Reviewed numerous National Archives Records Administration documents related to the retention and management of records; and,
- Held discussions with program officials and personnel from the Department, including representatives from the Offices of the Chief Information Officer; Legacy Management; Science; Environmental Management; Management, Budget and Evaluation; and the National Nuclear Security Administration.

The audit was conducted in accordance with generally accepted Government auditing standards for performance audits and included tests of internal controls and compliance with laws and regulations to the extent

## **Appendix 1 (continued)**

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necessary to satisfy the audit objectives. We assessed significant internal controls and performance measures in accordance with the *Government Performance and Results Act of 1993* regarding the management of the Department's records. There were no specific performance measures for records. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. We did not rely on computer-processed data to accomplish our audit objective.

Officials from the Office of Legacy Management waived an exit conference on April 4, 2005. In addition, officials from the Office of the Chief Information Officer waived an exit conference on April 11, 2005.



### PRIOR REPORTS

- Special Report on *Management Challenges at the Department of Energy*, (DOE/IG-0667, November 2004). As previously reported, information management remains a management challenge within the Department. Past reports have highlighted challenges in numerous areas of the information technology program, including adequate protection of the Department's data and computer systems.
- *Management Controls Over the Licensing Support Network for the Yucca Mountain Repository*, (OAS-M-04-04, May 2004). The Department experienced problems in screening electronic documents, including e-mail, to ensure that sensitive unclassified, *Privacy Act*, and privileged information was not inadvertently posted on the licensing support network. Specifically, the audit review found that 6.4 million e-mail documents were not processed, due to the need for manual reviews of the information. The report cited a lack of information archiving requirements as one of the causes for the delay in processing the information.
- *Information Management: Challenges in Managing and Preserving Electronic Records* (GAO-02-586, June 2002). The National Archives and Records Administration (NARA) has concluded that although agencies are creating and maintaining records appropriately, most electronic records (including databases of major Federal information systems) remain unscheduled (that is, their value has not been assessed nor their disposition determined), and records of historical value are not being identified and provided to NARA for archiving. As a result, valuable electronic records may be at risk of loss. The Government Accountability Office (GAO) found that part of the problem is that records management guidance is inadequate in the current technological environment of decentralized systems producing large volumes of complex records; the low priority often given to records management programs; and, the lack of technology tools to manage electronic records.



Department of Energy  
Washington, DC 20585

March 1, 2005

MEMORANDUM FOR GEORGE W. COLLARD  
ASSISTANT INSPECTOR GENERAL FOR AUDIT  
OPERATIONS, OFFICE OF INSPECTOR GENERAL

FROM: ROSITA O. PARKES *Rosita O. Parkes*  
CHIEF INFORMATION OFFICER

SUBJECT: Comments on Draft Inspector General Report

The Office of the Chief Information Officer (OCIO) has reviewed the draft Inspector General (IG) Audit Report entitled, "Retention and Management of Department of Energy (DOE) Records," and recommendations and findings are discussed below and in Attachment 1.

Implementation of records management is decentralized within the Department. The Chief Information Officer (CIO) has responsibility for records management policy, guidance, and evaluation, while program implementation is the responsibility of each Departmental Element. Please note that while the OCIO is working to strengthen its oversight program and facilitate the resolution of issues, this office does not have the authority to dictate program management activities (e.g., legacy records decisions). Further, NNSA remains adamant that they are excluded from OCIO oversight as it pertains to records management. In general, one of the key goals of the OCIO is to help facilitate a culture change whereby Departmental Elements "value" their records holdings as much as they do their other resources.

Recommendations (Restated)

1. Develop and finalize detailed policy and implementing guidance to support complex wide records management policy. Such guidance should address:
  - a. storage of electronic records, managing e-mail, and incorporating records management into the system life cycle;
  - b. a corporate solution for eliminating duplicate systems and consideration of existing systems when approved new records management projects.
2. Review the organizational placement of the senior records manager (Records Officer) to ensure that the position has sufficient authority to include responsibility for leading, planning and managing the Department/agency records management program.



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## Appendix 3 (continued)

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**Concurrence:** The CIO concurs in the recommendations. Recommendation 1.a. will be addressed in FY'05 and '06 through policy directives and a records management manual (see Item 5, Attachment 1). Recommendation 1.b. will be addressed by an enterprise e-Content Management Systems (given availability of funding) and the Capital Planning and Investment Control (CPIC) process (see Items 1 and 2, Attachment 1). However, please note that elimination of duplicate/similar systems is a complex issue. Integrating these requirements is a process that will take time to mature and institutionalize. There is a divergence in program offices between records and IT communities that must be overcome. And, most importantly, neither OMB nor Congress has mandated integration of records requirements with existing CPIC processes. The requirement is from NARA without the "authority" of A-11 dictating participation, which poses an additional challenge in the decentralized DOE culture (see Items 3 and 8, Attachment 1). Actions planned to address Recommendation 2 can be found in Item 6, Attachment 1.

**Facts and Conclusions:** The eight findings that were identified have been addressed in Attachment 1. Correctness of the findings, actions planned or taken, or explanations and additional recommendations are included for each. Comments on findings that relate to program implementation were solicited from the Program Office or Field site involved.

**Monetary Savings:** It is likely that DOE will realize cost savings through the reduction of records systems vis-à-vis a mature, robust CPIC program. Duplicate electronic records systems can be identified and addressed during the CPIC process. However, many of the costs are associated with legacy paper records, whereby Program Offices must conduct risk-cost-benefit analyses on a case-by-case basis to determine whether tangible savings can be identified. It will not be possible to estimate savings based just on the volume of legacy records or number of similar systems at each site. The records/systems must be reviewed in regard to such complex issues as litigation, moratoria, anticipated health and safety studies, environmental monitoring requirements, worker claims, frequency of use, retention projections, and contractor funding. These issues are intertwined with DOE/Program missions and are the responsibility of Departmental Elements. Please see actions taken/planned for the CIO and Departmental Elements in Item 8, Attachment 1.

Effective and cost efficient management of information resources can best be achieved through the optimal enforcement of NARA, OMB and Departmental policies. Issuance of records management policies and guidance, and evaluation of implementation by Departmental Elements are important CIO roles. Thank you for undertaking this audit and the opportunity to comment on the draft report. Questions regarding the comments may be addressed to Sharon Evelin, Departmental Records Officer, at (301) 903-3455.

### ATTACHMENT 1

#### FACTS, CONCLUSIONS AND ACTIONS TAKEN/PLANNED

##### 1. Electronic Records Management

The report is correct. To date, there has been no electronic record management guidance issued by the Department (see Item 5 below). Field sites and major contractors have implemented systems that meet their specific needs, with little oversight from their Headquarters Elements. Due to the varying types of document management systems in use throughout the Department and the immaturity of records management software, no consolidation has been attempted for the many systems that manage electronically formatted documents and records.

Actions Taken/Planned: Several pilots have been conducted that provided a base from which to identify issues and develop processes to manage e-records (including e-mail records). Although implementation and maintenance issues were numerous, an OCIO pilot proved the ability to link e-records with disposition instructions and provide for storage in original formats to meet e-records management requirements.

Sites unable to fund and/or develop systems to manage e-records (and e-mails) were instructed to print hardcopies for filing. This was done in an effort to ensure that all Federal records are captured, maintained, and available for retrieval. Documents created in electronic format were ultimately transferred to hardcopy for archival purposes. In the past, Federal Records Centers (FRCs) have not had the environmental controls needed for the storage of electronic media and the National Archives and Records Administration (NARA) has only recently (FY'04-05) updated from a paper standard to acceptance of different types of electronic media.

A DOE enterprise-wide e-Content Management System (eCMS) was identified as one of the corporate DOE EGOV initiatives (IDEA). However, funding was only available for mission critical initiatives (e.g., consolidated infrastructure) and was later redirected to a higher priority initiative (I-MANAGE). The eCMS is designed to build on previous pilots and lessons learned. When funded, it will provide an enterprise-wide management and disposition repository for all Departmental records. The eCMS is one of the initiatives on the President's Management Agenda and is being managed by the Department's Office of Management, Budget and Evaluation (ME), with technical guidance provided by the OCIO. The eCMS will eliminate the need for site-specific systems and will help to address new system proliferation and many of the issues associated with managing e-records/e-mail. If funding is made available, full implementation is not anticipated until FY'07 at the earliest.

### 2. Records Requirements for New Systems

The report is correct. NARA has directed that records management be built into all information management systems and, although the OCIO has prepared guidance consistent with the regulations, OMB has not required this integration nor have they included records management on Exhibit Forms 53 or 300.

Actions Taken/Planned: The OCIO began in FY'05 to address e-records requirements through the Capital Planning and Investment Control (CPIC), the approval and funding process for technology investments. Guidance and a checklist of requirements were provided to Departmental Elements/Program Records Officials (and published on the Records Management webpage) for use in coordinating e-records requirements with systems development teams. The OCIO reviews all CPIC documentation before submission to OMB to ensure completion. E-records management requirements will be reviewed as the CPIC process continues to mature and becomes fully institutionalized within the next few years. This process will eliminate duplication in systems that manage e-records and ensure records issues are addressed in other types of electronic systems.

In FY'05, NARA established an interagency workgroup to develop a records management module for Federal enterprise architecture. When completed, approved by the Information Technology Council, and implemented by agencies, it will provide seamless integration of e-records management.

In FY'04, NARA issued guidance requiring that older electronic systems be scheduled using their Standard Form SF-115 process. New systems will be addressed through the CPIC process; however, in FY'06 the OCIO will begin to work with Departmental Elements to schedule older systems. Six systems have been designated for completion in FY'05 and the remainder will be completed in FY'06 and FY'07. Departmental Elements will be provided a template to capture the information required to schedule each system. The OCIO will provide guidance and coordinate with NARA to affect approval of the schedules.

In the first quarter of FY'05, the OCIO established a workgroup from across the Department to revise disposition schedules using recently issued NARA guidance. Revision options were reviewed and strategies determined. The revision will be done using NARA's "bucket" concept and may reduce the existing (over) 1200 retentions to 150-250. The project is being lead by the Savannah River Operations Office and the concept will be unveiled at the 2005 Annual Information Management Conference. "Bucket" schedules will be easier to incorporate into electronic environments.

### 3. Duplicate Systems at Oak Ridge (and other sites)

The report is partially correct. However, this is a Program/Contract/Funding issue. Sites may maintain multiple systems to track and store records (and for other purposes), as is the case at Oak Ridge. (Explanation provided by Oak Ridge.)

**Explanation:** When major contractors are replaced, legacy systems (electronic and paper) are inherited by the new contractor(s). In the past, it has been the Department's practice to refrain from specifying level of detail to contractors on how to manage. Funding is not usually provided for management of existing systems and/or migration to new systems. New contractors maintain legacy records because they must for litigation, worker compensation, and other mission-type issues. The new contractor may develop, bring with them, or purchase systems to manage records that will be created under their contract term. This situation is especially complicated at Oak Ridge because the site operates projects for every DOE Program Element using different contractors and funding sources for each. Legacy systems/records must be maintained and their numbers increase each time there is a change in major contractor. Because there has been no mission requirement or funding identified to unite these systems (and perhaps no real need if the legacy records are not accessed often), it becomes an unfunded effort to the new contractor. There may be savings achieved in this area; however, Program Elements must evaluate their holdings to determine the feasibility from a mission standpoint and the cost of eliminating any duplication. Changes will require Program funding and possibly revisions to management and operating contracts. (Also see Item 7, Actions Taken/Planned, 2.)

**Recommendation:** No further action by OCIO, support provided to Program Offices as requested. This is an issue that has been identified to and is being addressed by the appropriate Program Offices. Note: Unless legacy records are under a destruction moratorium for litigation, epidemiology studies, or worker claims, they will eventually meet their retention dates and be destroyed. Sites must address the legacy records/systems issue on a case-by-case basis. (Also see item 8. below.)

The eCMS mentioned in Item 1 is intended for use throughout the Department, including its contractors. Although full implementation is a few years away, it will eliminate the need for stand-alone, site-specific systems.

#### 4. Closure Sites

**The report is partially correct.** The Environmental Schedule was approved by NARA in May 2000. The Pinellas site closure occurred in 1993. Since that time, Departmental disposition schedules have been developed, approved by NARA (approximately 1200 retentions), and placed on the OCIO Website (Records Management webpage).

**Explanation:** The Fernald problem is a common one for closing sites. Trained, experienced personnel leave as soon as possible and, since records disposition is one of the functions that is active until and after closure, remaining individuals (without experience) are assigned these responsibilities. A guidance document for closing sites was prepared by the OCIO and posted on the Records Management webpage after closure of the Superconducting Super Collider. The document includes lessons learned and specifies the need for experienced records personnel to remain until the site is closed.

**Recommendation:** No further action by OCIO, support provided to Program Offices as requested. This is an issue which has been identified to and is being addressed by the appropriate program offices - Legacy Management (LM) and Environmental Management (EM); this a program management issue rather than a Departmental records issue.

### 5. Guidance

**The report is correct.** Formal policies need to be issued for records management.

**Actions Taken/Planned:** The recently revised Records Management Order establishes the basic requirements for the program and its roles and responsibilities. It is expected to be issued in the 4<sup>th</sup> quarter of FY'05. (The Order does not contain a requirement for retaining e-records in their original form because there is no regulatory basis for such a requirement.) The Order requires (among other things) that, under the CPIC process, Departmental Elements address e-records management in new systems development.

A records management manual is also being developed that includes chapters on disposition scheduling, e-mail, e-records, permanent records, and will contain pointers to the web manual and vital records policy. It is anticipated that the records manual will be issued in FY'06.

A vital records policy is in the development phase, and a web manual has been drafted that includes web administration, security and records. The policy and manual will be sent to RevCom in FY'05.

### 6. Senior Attention/Placement

**The report is correct.** NARA has issued guidance recommending agencies elevate the Records Officer to a CIO direct report position. The objective is increased visibility for the Program.

**Action Planned.** Program placement will be evaluated in relationship to the A-76 CIO residual organization (FY'05).

### 7. Records at Risk

**The report is partially correct.** The risk of losing environmental, and health and safety records from closure sites is particularly urgent.

**Explanation:** The management of legacy records is a large part of the LM mission. LM is currently building an 180,000 cubic foot storage facility for legacy paper records in Morgantown, West Virginia. Additionally, LM has established an information system that meets records management standards and into which e-records from closing sites will be migrated. When necessary, LM will accept entire systems and will either incorporate the systems or manage them separately, depending on retention/retrieval needs.

Continued storage of paper is an issue not easily resolved because of moratoria on litigation, worker safety and health (for worker claims) and epidemiology records. The Morgantown facility will address the storage problem for closed sites. However, Departmental Elements will need to perform a risk-cost-benefit analysis on a case-by-case basis to determine the feasibility of scanning paper for transfer to e-records (see also Item 8. below). Some sites have determined that once the moratoria are lifted, the records can then be destroyed. In such cases, it may not be worth the expenditure to scan older records or try to manage them electronically. Only a case-by-case risk-cost-benefit analysis will determine the most effective, cost-efficient approach. Once Program Elements have completed the analyses, they will be required to identify resources for scanning and migration projects.

The eCMS, if funded, will also help to address the problem of records storage. Cost estimates for the eCMS indicate that there is a net savings in storing records electronically; however there will be large expenditures that will offset the \$9.50 per cubic foot required for the storage of paper records.

**Actions Planned.** No further action by OCIO, support provided to Program Offices as requested. 1) LM and EM will continue to work together to resolve issues related to legacy records; 2) By the draft Order, Program Records Officials in Headquarters Elements are required in FY'06 to do a Records Program Assessment to determine best practices and identify cost savings across their organizations (HQ/Field/M&O Contractors). OCIO will provide additional guidance and targets to ensure systems duplication and storage of paper records are included in the Program Assessments.

### 8. Monetary Savings

**The report is correct.** Cost savings may be gained in 1) elimination of duplicate systems and 2) converting legacy paper to e-records; however, as mentioned previously, costs expended may be greater than the benefits, if the records meet their retention periods and become eligible for destruction in the near-term or are not accessed frequently. Departmental Elements will have to conduct a cost-benefit analysis on a case-by-case basis to determine if tangible benefits can be realized. (Also see Item 3 for issues regarding legacy systems maintained by management and operating contractors.)

**Action Taken/Planned:** Senior Program Records Officials (PROs) in Headquarters Elements are required in FY'06 to do a Records Program Assessment to determine best practices and cost savings across their organizations (includes HQ/Field/Contractors). OCIO guidance to PROs will target legacy systems duplication and storage of paper records for risk-cost-benefit analyses. The program assessments are a follow-up to self-assessments on records management implementation, which are required of each Departmental Element in FY'05.

In FY'07, the OCIO will begin evaluation of records management implementation. The evaluations will aid in determining the effectiveness of existing policy and guidance and future needs. Interviews will be conducted and self-assessment and program assessment



## **Appendix 3 (continued)**

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documents reviewed to identify cost efficiencies, best practices and opportunities for improvement. A report of findings and recommendations will be provided to the Head of each Element evaluated.

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