



Office of Inspector General  
United States Department of State

ISP-22-20

Office of Inspections

June 2022

# **Management Assistance Report: The Department of State's Records Retirement Process**

MANAGEMENT ASSISTANCE REPORT

## Summary of Review

OIG reviewed the Department of State's (Department) records retirement process, managed by the Records and Archives Management (RA) Division in the Bureau of Administration's Office of Information Programs and Services. The records retirement process involves transferring semi-active or inactive records to the Department's Records Service Center or electronic records archive and is part of the Department's larger records and information lifecycle management program established to manage the creation and preservation of records in accordance with the Federal Records Act. OIG has consistently found deficiencies in this area. In 84 inspection reports issued from FY 2019 through FY 2021, OIG found 31 records management related findings, 23 of which directly related to records retirement. OIG's objectives in this review were to determine: (1) whether the Department's record retirement process complied with applicable Office of Management and Budget, National Archives and Records Administration, and Department standards; and (2) the extent to which the Bureau of Administration developed, updated, and communicated records retirement standards to program managers.

During this review, OIG found the records retirement compliance dashboard managed by RA indicated that only a few domestic bureaus and offices and overseas posts complied with records retirement requirements. OIG's review determined that multiple factors contributed to this issue, including the decentralized nature of the Department's records management program, insufficient internal controls within RA, unclear guidance on how to comply with records retirement standards, and outdated policies. OIG made eight recommendations to address the factors contributing to the records retirement process compliance issues. In its comments on the draft report, the Bureau of Administration concurred with seven recommendations and neither agreed nor disagreed with one recommendation. OIG considers seven recommendations resolved and one recommendation unresolved. The bureau's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The bureau's formal written response is reprinted in its entirety in Appendix B.

## BACKGROUND

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The Department of State's records and information lifecycle management program is designed to create and preserve Federal records in accordance with the Federal Records Act of 1950, as amended,<sup>1</sup> and to establish effective management controls over the creation, maintenance and use, and disposition of those records. The program requires that all bureaus, offices, and overseas posts develop an active, continuing records management program that includes proper retirement of Department records. Records retirement<sup>2</sup> involves the transfer of semi-active or inactive non-electronic (paper) and electronic records from offices to physical

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<sup>1</sup> The Federal Records Act was amended in 2014. See Pub. L. No. 81-754; Pub. L. No. 113-187; 44 U.S.C. Chapters 21, 29, 31, and 33.

<sup>2</sup> According to 5 Foreign Affairs Handbook (FAH)-4 H-113, retirement is the "transfer of records to the Records Service Center or a Federal records center for storage according to the authority cited in the records disposition schedules."

warehouse space and electronic archives.<sup>3</sup> An active records retirement program provides the Department the ability to maintain a historical archive of U.S. Government foreign policy records, improve office efficiency, minimize security risk, and reduce record storage expenses.

## **Mission and Organization**

The Bureau of Administration's Office of Information Programs and Services (A/GIS/IPS) serves as the primary point of contact and principal advisor on all matters concerning records management, including records retirement. The RA Division within A/GIS/IPS is the Department's Federal Records Act program office and serves as the records retirement business process owner. The RA Division Director is the Agency Records Officer responsible for all records Department-wide throughout their lifecycle.

At the time of this review, RA's authorized staffing consisted of 21 full-time Civil Service positions. In addition, the division had 31 contract positions. As of January 2022, 9 of the 21 Civil Service positions were listed as vacant.<sup>4</sup> The division is divided into two branches: the Archiving Systems branch, which supports a wide range of Office of Global Information Services' information systems management activities not directly related to records retirement, and the Policy and Lifecycle branch, which focuses on records management policy and managing the lifecycle of the Department's records. The Department's Electronic Records Management Working Group,<sup>5</sup> made up of Department records management stakeholders, also develops records management policy guidance. The RA Director is a member of the working group.

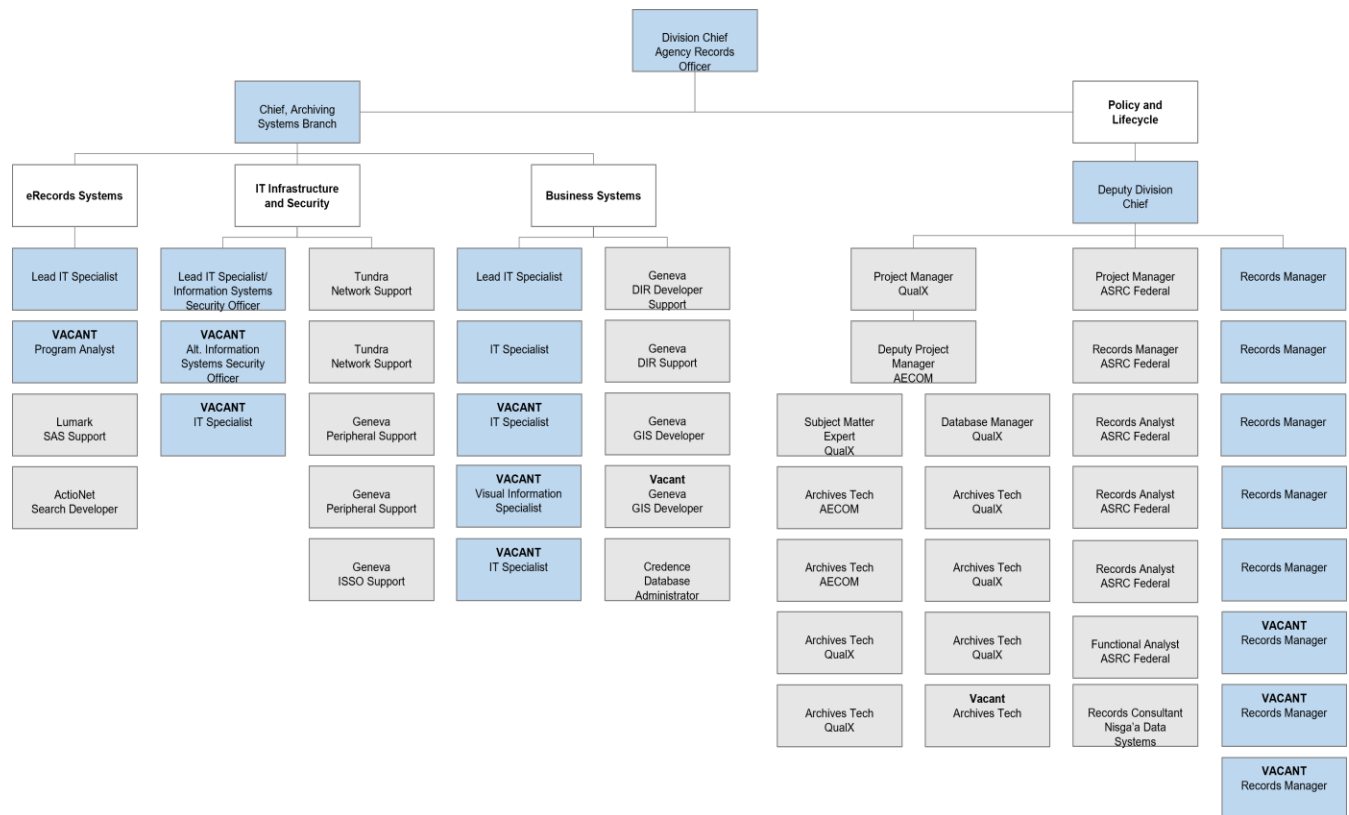
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<sup>3</sup> 5 FAH-4 H-318, "Retirement;" see also cable 20 STATE 92144, "Introducing the New Electronic Records (eRecords) Submission Portal," September 17, 2020.

<sup>4</sup> Six of the nine full-time Civil Service vacancies are in RA's Archiving Systems branch, which does not directly support the records retirement process.

<sup>5</sup> The Department established the Electronic Records Management Working Group in 2013 in response to Office of Management and Budget (OMB) Memorandum M-12-18, "Managing Government Records Directive," issued August 24, 2012, by the Office of Management and Budget and the National Archives and Records Administration.

**Figure 1: Records and Archives Management Division Organization Chart<sup>6</sup>**



**Source:** OIG generated from information obtained from A/GIS/IPS/RA. Blue boxes are Civil Service positions and gray boxes are contractors.

## Records Retirement Process

RA operates two central file storage repositories for archiving and retiring Department records. The Records Service Center (RSC), a physical storage facility, is responsible for the storage, search, and retrieval of retired paper records as well as the retirement and transfer of paper records to a Federal Records Center<sup>7</sup> or to the custody of the National Archives and Records Administration (NARA). The eRecords System, implemented in 2017, is an electronic storage system operated in coordination with the Bureau of Information Resource Management that serves as the Department's central records archive for electronic records.

Department bureaus, offices, and overseas posts transfer retired records to RA in several ways. Paper records are physically transferred to the RSC while electronic records are transferred

<sup>6</sup> Current as of December 2021. During the review, A/GIS was in the process of finalizing a reorganization that adds the Archiving Systems Branch to RA. Although it had yet to be officially finalized, RA operated under this reorganization plan during the review.

<sup>7</sup> The National Archives and Records Administration (NARA) operates a system of Federal Records Centers for the economical storage of temporary records from Government agencies. Records stored at a Federal Records Center are still considered to be in the custody of the agency from which the records originated.

using the eRecords self-submission portal.<sup>8</sup> Email records are automatically transferred to the eRecords System using an automated process called journaling.<sup>9</sup>

The disposition of Department records, which includes records retirement, is determined by a bureau, office, or overseas post records disposition schedule. These schedules include comprehensive lists of all categories of Department records relevant to each bureau or post, the required minimum length of time each category should be retained, and the final action for those records. The Department's schedules are composed of "program" and "administrative" records. Program records focus on the unique and substantive functions of a bureau, office, or post and are typically mission oriented. Administrative records address the more routine management functions common to all bureaus and posts.<sup>10</sup>

The RA Policy and Lifecycle Branch records managers, in consultation with bureaus and offices, develop the records disposition schedules, which are then reviewed by NARA and ultimately approved by the Archivist of the United States. RA relies on a network of more than 230 bureau and post records coordinators to ensure compliance with the schedules.<sup>11</sup> These coordinators perform records management duties, including records retirement, as a collateral duty and are not part of the RA reporting chain of command.

## **Past OIG Work Found Records Management and Records Retirement Issues**

OIG reported about challenges related to records management and records retirement in the past. OIG issued 84 inspection reports between October 1, 2018, and September 30, 2021, that included 31 findings related to records management, 23 of which directly related to records retirement. Additionally, in September 2020, OIG issued a management assistance report on deficiencies in overseas records management.<sup>12</sup> That report found A/GIS/IPS did not communicate regularly with, or provide individualized support to, records management personnel at overseas posts and recommended that the Bureau of Administration implement a plan to improve communication and support. As a result, the Under Secretary for Management sent a cable<sup>13</sup> in 2020 to all posts that focused on increasing awareness of existing records management resources. Additionally, in 2021, RA developed a handbook for overseas records coordinators summarizing content from the Foreign Service Institute's records management

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<sup>8</sup> The eRecords self-submission portal, part of the eRecords System, allows bureaus, office, and overseas posts to transfer permanent electronic records to the Bureau of Administration.

<sup>9</sup> Journaling is the ability to record all communications in an organization, including emails, as part of its email retention and archival strategy.

<sup>10</sup> Overseas post records disposition schedules contain the same program and administrative record categories for all posts. Domestic records disposition schedule program record categories are different for each bureau or office and are tailored to the specific entity's mission.

<sup>11</sup> Records coordinators are appointed by a domestic bureau or overseas post and are responsible for coordinating records activities with RA.

<sup>12</sup> OIG, *Management Assistance Report: Deficiencies in Overseas Records Management* (ISP-20-25, September 2020).

<sup>13</sup> Cable 20 STATE 122612, "A Message from Undersecretary for Management Brian Bulatao Regarding State Department Records Management Responsibilities," December 18, 2020.

courses; briefed each regional bureau executive office on records management; and held a virtual records management conference targeted at domestic and overseas records coordinators.

## FINDINGS

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OIG reviewed the Department's records retirement processes, including current standard operating procedures, the compliance status on retiring records, internal controls related to monitoring and enforcing records retirement compliance, and communication with the Department's records management stakeholders.<sup>14</sup> Despite the recent efforts by RA and Department leadership to raise awareness, stakeholders told OIG that retiring Federal records was not a high priority for the Department. OIG found several areas in the Department's records retirement program that required management attention.

### **Compliance With Federal Records Retirement Requirements**

#### ***Records and Archives Management Division Lacked Records Management Tracking, Monitoring, and Notification Processes***

OIG found that RA did not establish tracking monitoring, or notification processes to hold bureaus, offices, and overseas posts accountable for complying with records retirement requirements. The lack of such processes is particularly problematic because most posts and bureaus were not in compliance with the Department's records retirement policy. Specifically, OIG's review of data in the Permanent Records Retirement Dashboard<sup>15</sup> found that only one of 321 overseas posts and five of 54 domestic bureaus and offices were in compliance with the Department's records retirement policy.<sup>16</sup> In addition, the dashboard showed that domestic bureaus and offices did not retire any records for 361 of the 884 (41 percent) records disposition schedules tracked by the dashboard.<sup>17</sup> Although RA sent annual emails to noncompliant or partially compliant bureaus, offices, and overseas posts reminding them of the requirements, the process was informal and did not include tracking responses or following up with nonresponsive records coordinators. Policy in 5 Foreign Affairs Manual (FAM) 433b states that all offices and posts must retire records in accordance with records disposition schedules issued by RA and approved by NARA. Additionally, 5 FAM 414.2 states that the Department's records officer is responsible for seeing that the Department and its component elements comply with Federal records statutes and regulations.

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<sup>14</sup> See Appendix A.

<sup>15</sup> The Permanent Records Retirement Dashboard displays data identifying whether a bureau, office, or overseas post is compliant with retiring records in accordance with its records disposition schedules. OIG reviewed the dashboard to gather compliance data.

<sup>16</sup> To avoid the self-interest threat to OIG's independence, OIG determined it was most appropriate to not include its own records retirement compliance scores in this review. See Appendix A for more information.

<sup>17</sup> Prior to the review, the RA Division began consolidating records schedules to reduce the total number of schedules. The consolidation process was ongoing during the review.

RA staff told OIG the decentralized nature of the Department's records management program contributed to challenges in monitoring and ensuring compliance with records retirement requirements because RA did not have a direct presence in, or control over, bureau, office, and overseas post records management activities, nor were the records coordinators in RA's chain of command. However, RA staff also told OIG the division lacked effective internal controls to track and monitor compliance. They said they were formalizing a process to notify records coordinators of their status and track responses but had yet to complete it at the conclusion of this review. The failure to comply with records retirement requirements can result in the loss of important data for historical insight into policy analysis, decision-making, and archival research.

**Recommendation 1:** The Bureau of Administration should require that the Records and Archives Management Division implement internal controls to hold bureaus, offices, and overseas posts accountable for complying with Federal and Department records retirement standards. (Action: A)

***Records and Archives Management Division Did Not Know the Status of All Permanent Records***

OIG found RA did not know the status or location of paper Department records that were eligible for retirement but had yet to be sent to the RSC. Guidance in 1 FAM 214.3-8a requires RA, and more specifically its Agency Records Officer, to exercise program management responsibility for all records Department-wide throughout their lifecycle. OIG found that RA determined whether records submitted to the RSC met the records disposition schedules. However, RA failed to track the status or location of other records not yet sent to the RSC. For example, if a bureau, office, or overseas post did not submit records for retirement during a given year, RA notified the entity that it did not submit records but did not determine whether the records were still being stored onsite, were destroyed, or were missing. The failure to track the status and location of these records could result in records not being retired in accordance with the Federal Records Act.

**Recommendation 2:** The Bureau of Administration should require the Records and Archives Management Division to establish a process to identify the status of permanent records that are eligible for retirement but not yet retired, in accordance with Department guidance. (Action: A)

***Division Did Not Review Electronic Records for Compliance***

RA did not review electronic records located in the eRecords System for compliance with records retirement requirements in 5 FAM 433. At the time of this review, eRecords, the Department's only central records repository that includes emails and permanent electronic files, had captured more than 2 billion records since 2017, including emails from OpenNet, the Foreign Affairs Network,<sup>18</sup> and the Foreign Service Institute. Additionally, in 2020, eRecords

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<sup>18</sup> OpenNet is the Department's Sensitive But Unclassified internal network or intranet, providing access to Department-specific web pages, email, and other resources. The Foreign Affairs Network, developed by the

started accepting electronic records from Department employees through the self-submission portal. RA staff told OIG they did not have adequate staff to review electronic records for compliance and past budget requests to develop an automated compliance dashboard were not funded. However, OIG determined that implementing an electronic records compliance review process was feasible using currently available features in the eRecords System. Without monitoring archived electronic records, the Department would not know if bureaus and overseas posts complied with records retirement requirements.

**Recommendation 3:** The Bureau of Administration should require the Records and Archives Management Division to review electronic records for compliance with Department records retirement requirements. (Action: A)

***Department Not on Pace to Comply With Electronic Records Management Transition Mandates***

Department officials interviewed by OIG stated the Department was not on target to meet the Federal mandate to transition to fully electronic recordkeeping and submit all paper records to NARA by December 31, 2022, an assessment that NARA staff confirmed. The Office of Management and Budget and NARA issued Executive Memorandum M-19-21 in June 2019. Goal 1.2 of M-19-21 states that after December 31, 2022, Federal agencies will manage all permanent records in an electronic format and that NARA and the Federal Records Centers will only accept electronic records.<sup>19</sup> RA and NARA staff both confirmed that although RA established a process to convert paper records to an electronic format, the division had yet to implement the process.

OIG identified a lack of approved funding and COVID-19 pandemic restrictions as causes for the Department not being on pace to meet the December 2022 deadline. RA proposed a plan in October 2020 to digitize all Department paper records held at the RSC prior to December 31, 2022, at a cost of approximately \$37.9 million. The Bureau of Administration did not approve the funding request due to competing priorities from other bureau initiatives. RA estimated the cost could increase to an estimated \$60 million<sup>20</sup> if digitization was delayed until after December 2022 due to the ongoing costs of storing the paper records while simultaneously continuing to digitize the paper records using current RA resource levels. In addition, Department records management stakeholders, including RA staff, told OIG restrictions related to the COVID-19 pandemic slowed the process of transferring records to NARA, creating a backlog.

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Department's Bureau of Information Resource Management, is a cloud-based solution that extends cloud services to all members of the foreign affairs community.

<sup>19</sup> OMB Memorandum M-19-21, "Transition to Electronic Records," June 28, 2019.

<sup>20</sup> A/GIS/IPS documentation estimated it would take 20 years to digitize the paper records holdings at current RA staffing and resource levels. The \$60 million estimate includes the costs associated with storing the paper records an additional 20 years while simultaneously digitizing them.



In 2020, NARA issued guidelines for Federal agencies unable to meet the December 2022 deadline to request an exception.<sup>21</sup> RA leadership told OIG they are planning to transfer as many paper records as they can to NARA before the December 31, 2022, deadline, and plan to submit an exception request at the end of summer 2022 for any paper records they do not think they will be able to transfer prior to the deadline. The failure to meet NARA's deadline to submit paper records and convert to fully electronic record keeping or submit an exception request could cost the Department millions of additional dollars in funding because it would leave the Department, rather than NARA, responsible for the storage and oversight of billions of pages of paper records for years to come.

**Recommendation 4:** The Bureau of Administration should require the Records and Archives Management Division to comply with the requirements established in Executive Memorandum M-19-21 and National Archives and Records Administration Bulletin 2020-01. (Action: A)

## Communication and Guidelines

### *Records Retirement Dashboard Did Not Present Information Clearly*

The Permanent Records Retirement Dashboard operated and maintained by RA did not present records retirement stakeholders with clear information needed to properly manage their programs. RA established the dashboard in 2017 to provide a snapshot of overseas post and domestic office permanent record retirement data and record retirement activities. The data displayed on the dashboard included the post, office, or bureau name; the year the records were retired; the program record type; and the compliance status for the year listed. OIG's review of the dashboard found it did not clearly explain what type of records data was being presented (e.g., paper or electronic), the compliance status designations, or who to contact to find out how to improve the compliance status. For example, the dashboard displayed whether a post was compliant, not compliant, or partially compliant, but did not provide information explaining what partially compliant or not compliant meant. The Government Accountability Office's *Standards for Internal Control in the Federal Government*,<sup>22</sup> Principle 13.05, states that management should process data into quality information that supports the internal control system. Dashboard development personnel told OIG that when the dashboard was developed, RA was unclear about who would be using it. In addition, the original requirements did not include an explanation of the key performance indicators. Data that is not presented clearly and in an easily understandable manner creates challenges for stakeholders to act on the data and improve compliance.

**Recommendation 5:** The Bureau of Administration should require the Records and Archives Management Division to update the Permanent Records Retirement Dashboard to provide

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<sup>21</sup> NARA Bulletin 2020-01, "Guidance on OMB/NARA Memorandum Transition to Electronic Records, (M-19-21)," September 30, 2020.

<sup>22</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government* 59-60 (GAO-14-704G, September 2014).

an explanation of the data and contact information for questions about the dashboard.  
(Action: A)

### ***Division Did Not Proactively Communicate With Records Coordinators***

OIG found RA did not proactively communicate with bureau and post records coordinators.<sup>23</sup> As discussed above, RA had only an ad hoc process to communicate with records coordinators. In addition, although the division created a listserv to send recurring updates and reminders to bureau and post records coordinators, it did not actively use the listserv to communicate. The *Standards for Internal Control in the Federal Government*,<sup>24</sup> Principle 14.03, states that management should communicate quality information down and across reporting lines to enable personnel to perform key roles in achieving objectives, addressing risks, and supporting the internal control system. RA leadership told OIG the employee responsible for sending updates and reminders on the listserv had departed and the responsibility had yet to be reassigned. OIG contacted 10 post records coordinators, 5 of whom (50 percent) did not know how to determine their organization's records retirement compliance status or how to improve that status. RA's failure to proactively communicate with post records coordinators, combined with the records retirement dashboard's lack of clarity discussed previously, contributed to the lack of awareness among some records coordinators on how to check and improve their records retirement compliance status.

**Recommendation 6:** The Bureau of Administration should require the Records and Archives Management Division to establish a process for regularly communicating with bureau and post records coordinators. (Action: A)

### ***The Foreign Affairs Manual and Foreign Affairs Handbook Contained Outdated Policies and Procedures for Overseas Posts***

RA did not review or update records retirement policies and procedures for overseas posts in the FAM and Foreign Affairs Handbook (FAH) to ensure they were accurate and complete. For example, 5 FAH-4 H-312.3 requires overseas records coordinators to submit a biennial records report, although this requirement was dropped in the late 1990s. Additionally, 5 FAH-4 H-315.2-1 requires overseas posts to submit a destruction log along with their biennial records report, even though RA no longer requires the destruction logs to be submitted. Furthermore, 5 FAM 414.3-3(4) states that the Department's RSC is operated by the Statutory Compliance and Research Division, when it is operated by RA. As stated in 18 FAM 201.1-1(B), the Department provides guidance through the FAM and FAH and requires offices to review them annually and issue any required changes in a timely manner. RA staff told OIG this issue occurred because of a combination of staff vacancies and competing priorities, adding they were waiting to

<sup>23</sup> As noted earlier in this report, in response to OIG's recommendation in a previous management assistance report (ISP-20-25), the Bureau of Administration took steps to improve communication and support for overseas records management personnel. However, as discussed here, OIG found there is a need for proactive, regular communication with records coordinators in both bureaus and overseas posts to improve compliance with records retirement requirements.

<sup>24</sup> GAO-14-704G, September 2014, at 60.

consolidate and submit several updates all at once to ease the administrative burden. Inaccurate and out of date FAM and FAH guidance increases the risk that overseas records coordinators will be unable to properly conduct post records management programs.

**Recommendation 7:** The Bureau of Administration should implement procedures to regularly review and update the Department's records retirement policies and procedures in the Foreign Affairs Manual and Foreign Affairs Handbook in accordance with Department guidelines. (Action: A)

***Records Disposition Schedules for Overseas Posts Did Not Align With Current Business Practices***

The Department's records disposition schedules for overseas post program files were not consistent with current business practices and email retirement requirements found in NARA's General Records Schedule (GRS) 6.1,<sup>25</sup> adopted in 2017 and updated in 2020, and 5 FAM 433. Guidance in 5 FAM 433b requires posts to retire records in accordance with approved records disposition schedules, but OIG found RA did not update these schedules for overseas posts' program files to reflect the Department's current methods of communication or the updated GRS 6.1 requirements for Federal email records. For example, in accordance with GRS 6.1, overseas program emails would be categorized as emails of non-capstone officials that are temporary records to be deleted after 7 years, unless required for business use. However, the Department's disposition schedules for overseas records list emails as permanent records to be retired after 1 year and retained at the RSC for 25 years. In addition, overseas schedules refer to telegrams, which have been replaced by the Department's SMART cable system, but fail to include modern messaging methods such as text messaging and electronic messaging systems. RA staff told OIG they had planned to update overseas schedules in 2022 but instead prioritized responding to other requirements. OIG also determined staffing shortages in RA contributed to delays in updating records disposition schedules. Without clear guidance in records disposition schedules, overseas posts will continue to receive conflicting records retirement information, frustrating records coordinators and making it difficult or impossible to properly retire records.

**Recommendation 8:** The Bureau of Administration should require the Records and Archives Management Division to update records disposition schedules for overseas posts to reflect all Department messaging methods. (Action: A)

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<sup>25</sup> NARA's General Records Schedule 6.1, "Email Managed under a Capstone Approach," provides disposition instructions and authorities for agencies who implement a Capstone approach. Capstone officials are senior agency officials designated by account level or by email addresses whose emails are considered permanent records. Non-capstone emails are those of non-senior agency officials and are considered temporary records. GRS 6.1 applies to all email messages, regardless of how the email messages are managed or what email technology is used.

## RECOMMENDATIONS

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OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to the Bureau of Administration. The bureau's complete response can be found in Appendix B.<sup>1</sup> The bureau also provided technical comments that were incorporated into the report, as appropriate.

**Recommendation 1:** The Bureau of Administration should require that the Records and Archives Management Division implement internal controls to hold bureaus, offices, and overseas posts accountable for complying with Federal and Department records retirement standards. (Action: A)

**Management Response:** In its May 19, 2022, response, the Bureau of Administration concurred with this recommendation. The bureau noted an estimated completion date of December 31, 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration required the Records and Archives Management Division to implement internal controls to hold bureaus, offices, and overseas posts accountable for complying with Federal and Department records retirement standards.

**Recommendation 2:** The Bureau of Administration should require the Records and Archives Management Division to establish a process to identify the status of permanent records that are eligible for retirement but not yet retired, in accordance with Department guidance. (Action: A)

**Management Response:** In its May 19, 2022, response, the Bureau of Administration concurred with this recommendation. The bureau noted an estimated completion date of December 31, 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration required the Records and Archives Management Division to establish a process to identify the status of permanent records that are eligible for retirement but not yet retired, in accordance with Department guidance.

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<sup>1</sup> OIG faced delays in completing this work because of the COVID-19 pandemic and resulting operational challenges. These challenges included the inability to conduct most in-person meetings, limitations on our presence at the workplace, difficulty accessing certain information, prohibitions on travel, and related difficulties within the agencies we oversee, which also affected their ability to respond to our requests.

**Recommendation 3:** The Bureau of Administration should require the Records and Archives Management Division to review electronic records for compliance with Department records retirement requirements. (Action: A)

**Management Response:** In its May 19, 2022, response, the Bureau of Administration neither agreed nor disagreed with this recommendation. The bureau noted it agrees with the recommendation to review permanent records required by policy but not yet transferred to eRecords for compliance, and it estimated a completion date of December 31, 2022.

**OIG Reply:** OIG considers the recommendation unresolved. As noted in the report, OIG found that the Records and Archives Management Division did not review or monitor electronic records that were already transferred to the eRecords System. OIG acknowledges that a review of permanent records not yet transferred to the system will assist in compliance with Department records retirement requirements, but also notes that the electronic records already transferred need to be reviewed as part of the process. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration required the Records and Archives Management Division to review electronic records currently in the eRecords System for compliance with Department records retirement requirements.

**Recommendation 4:** The Bureau of Administration should require the Records and Archives Management Division to comply with the requirements established in Executive Memorandum M-19-21 and National Archives and Records Administration Bulletin 2020-01. (Action: A)

**Management Response:** In its May 19, 2022, response, the Bureau of Administration concurred with this recommendation. The bureau noted an estimated completion date of December 31, 2022.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration required the Records and Archives Management Division to comply with the requirements established in Executive Memorandum M-19-21 and National Archives and Records Administration Bulletin 2020-01.

**Recommendation 5:** The Bureau of Administration should require the Records and Archives Management Division to update the Permanent Records Retirement Dashboard to provide an explanation of the data and contact information for questions about the dashboard. (Action: A)

**Management Response:** In its May 19, 2022, response, the Bureau of Administration concurred with this recommendation. The bureau noted an estimated completion date of October 31, 2022.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration required the Records and Archives Management Division to update the Permanent Records Retirement

Dashboard to provide an explanation of the data and contact information for questions about the dashboard.

**Recommendation 6:** The Bureau of Administration should require the Records and Archives Management Division to establish a process for regularly communicating with bureau and post records coordinators. (Action: A)

**Management Response:** In its May 19, 2022, response, the Bureau of Administration concurred with this recommendation. The bureau noted an estimated completion date of September 30, 2022.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration required the Records and Archives Management Division to establish a process for regularly communicating with bureau and post records coordinators.

**Recommendation 7:** The Bureau of Administration should implement procedures to regularly review and update the Department's records retirement policies and procedures in the Foreign Affairs Manual and Foreign Affairs Handbook in accordance with Department guidelines. (Action: A)

**Management Response:** In its May 19, 2022, response, the Bureau of Administration concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration implemented procedures to regularly review and update the Department's records retirement policies and procedures in the Foreign Affairs Manual and Foreign Affairs Handbook in accordance with Department guidelines.

**Recommendation 8:** The Bureau of Administration should require the Records and Archives Management Division to update records disposition schedules for overseas posts to reflect all Department messaging methods. (Action: A)

**Management Response:** In its May 19, 2022, response, the Bureau of Administration concurred with this recommendation. The bureau noted an estimated completion date of September 30, 2022.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration required the Records and Archives Management Division to update records disposition schedules for overseas posts to reflect all Department messaging methods.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This review was conducted from January 3 to March 16, 2022, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. Consistent with Section 209 of the Foreign Service Act of 1980, this review focused on the Department of State's records retirement process. OIG's specific inspection objectives were to determine whether:

- The Department's record retirement process complied with applicable Office of Management and Budget, National Archives and Records Administration, and Department standards.
- The Bureau of Administration developed, updated, and communicated records retirement standards to program managers.

OIG used a risk-based approach to prepare for this review. Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG conducted the review remotely and relied on audio- and video-conferencing tools in lieu of in-person interviews with Department and other personnel. OIG also reviewed pertinent records, such as established standard operating procedures, the compliance status on retiring records, internal controls related to monitoring and enforcing records retirement compliance, and communication with records management coordinators and stakeholders.

The Quality Standards for Inspection and Evaluation state that "[i]nspectors and inspection organizations must be independent, both in fact and appearance, in matters relating to inspection work." The standards further require inspection organizations to assess threats to independence, such as the "threat that [an] . . . interest will inappropriately influence an inspector's judgment or behavior," known as the self-interest threat, and apply safeguards to eliminate those threats or reduce them to an acceptable level. To ensure compliance with the standards and eliminate any real or perceived threats to its independence, OIG determined it was most appropriate to not review OIG's records management program or include OIG's records retirement compliance scores in this review.

At the conclusion of the review, OIG shared the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

Team Leader Brett Fegley, Brian Smith, Paul Sanders, and Eric Chavera conducted this review. Other report contributors included Caroline Mangelsdorf and Patricia Stewart.



## APPENDIX B: MANAGEMENT RESPONSE

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**United States Department of State**

*Washington, D.C. 20520*

UNCLASSIFIED

May 19, 2022

### **NOTE FOR ASSISTANT INSPECTOR GENERAL FOR AUDITS SANDRA LEWIS**

**FROM:** A/GIS – Eric F. Stein

**SUBJECT:** Response to Draft OIG Report – Management Assistant Report: The Department of State’s Records Retirement Process

The Bureau of Administration has reviewed the draft OIG inspection report from the subject line. Provided below are responses to the recommendations in the report. Separate comments on the report itself are being submitted to [ispclearances@stateoig.gov](mailto:ispclearances@stateoig.gov) following OIG guidance.

**OIG Recommendation 1:** The Bureau of Administration should require that the Records and Archives Management Division implement internal controls to hold bureaus, offices, and overseas posts accountable for complying with Federal and Department records retirement standards. (Action: A)

**Management response (5/19/22):** The A Bureau agrees with this recommendation. The A Bureau plans to implement an enhancement to its records tracking tool to track data call responses, monitor compliance and routinely notify records coordinators of their compliance status. The estimated timeframe for the enhancement to the compliance tracking tool is December 31, 2023.

**Recommendation 2:** The Bureau of Administration should require the Records and Archives Management Division to establish a process to identify the status of permanent records that are eligible for retirement but not yet retired, in accordance with Department guidance. (Action: A)

**Management response (5/19/22):** The A Bureau agrees with the recommendation and will conduct data calls to identify the corpus of records noted in the recommendation. The estimated timeframe for agency-wide completion is December 31, 2023.

**Recommendation 3:** The Bureau of Administration should require the Records and Archives Management Division to review electronic records for compliance with Department records retirement requirements. (Action: A)

**Management response (5/19/22):** The A Bureau agrees with the recommendation to review permanent records required by policy but not yet transferred to eRecords for compliance. The estimated timeframe for completion of this review is December 31, 2022.



**Recommendation 4:** The Bureau of Administration should require the Records and Archives Management Division to comply with the requirements established in Executive Memorandum M-19-21 and National Archives and Records Administration Bulletin (NARA) 2020-01. (Action: A)

**Management response (5/19/22):** The A Bureau agrees with the recommendation. The Records and Archives Management Division is currently working towards compliance with the mandate based on its physical transfer plan pursuant to the newly released NARA memorandum AC 33. 2022. The estimated date of completion for this is December 31, 2022.

**Recommendation 5:** The Bureau of Administration should require the Records and Archives Management Division to update the Permanent Records Retirement Dashboard to provide an explanation of the data and contact information for questions about the dashboard.

**Management response (5/19/22):** The A Bureau agrees with the recommendation. The Records and Archives Management Division will update the dashboard to provide an explanation of the data and contact information for questions about the dashboard. The estimated timeframe for completion is October 31, 2022.

**Recommendation 6:** The Bureau of Administration should require the Records and Archives Management Division to establish a process for regularly communicating with bureau and post records coordinators. (Action: A)

**Management response (5/19/22):** The A Bureau agrees with the recommendation. The A Bureau notes that a near duplicate recommendation was issued by the OIG (ISP-I-20-25 Recommendation 1) to the A Bureau and the recommendation was closed by the OIG in May 2021. The Records and Archives Management Division will communicate regularly with bureau and post records coordinators by establishing a bureau and post communications strategy. The timeline for completion of the communications strategy is September 30, 2022.

**Recommendation 7:** The Bureau of Administration should implement procedures to regularly review and update the Department's records retirement policies and procedures in the Foreign Affairs Manual and Foreign Affairs Handbook in accordance with Department guidelines. (Action: A)

**Management response (5/19/22):** The A Bureau agrees with the recommendation. The draft of the updated Records Management FAM section is currently undergoing formal Department clearance. After it is published, the Records and Archives Management Division will notify the OIG. The Records and Archives Management Division will also remove the outdated FAH procedures, as noted in the MAR by September 30, 2022.

**Recommendation 8:** The Bureau of Administration should require the Records and Archives Management Division to update records disposition schedules for overseas posts to reflect all Department messaging methods. (Action: A)

**Management response (5/19/22):** The A Bureau agrees with the recommendation. The Records and Archives Management Division will consult with the National Archives and Records Administration (NARA) on the best approach to resolving potentially conflicting

language between NARA's general schedules and the Department's overseas records disposition schedules. The estimated timeframe for completion is September 30, 2022.

If you have any questions or concerns please contact Eric F. Stein at [SteinEF@State.gov](mailto:SteinEF@State.gov).



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