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Office of Inspector General
United States Department of State

ISP-20-25

Office of Inspections

September 2020

Management Assistance Report: Deficiencies in Overseas Records Management

MANAGEMENT ASSISTANCE REPORT

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Summary of Review

OIG reviewed 51 overseas inspection reports issued from October 1, 2016, to September 30, 2019, and identified 23 findings involving records management deficiencies. In these reports, OIG found a wide variance in the implementation and execution of records management responsibilities at overseas posts. OIG highlighted several causes for the variance, including a lack of understanding by assigned staff of their records management responsibilities, insufficient training, and lack of management oversight. Although the Bureau of Administration's Global Information Services, Office of Information Programs and Services (A/GIS/IPS)—the Department's designated records office and principal advising office on records management—led several efforts to increase outreach and training to overseas records management personnel, OIG continued to identify deficiencies in records management. OIG made one recommendation to the Bureau of Administration to address the reported causes of records management deficiencies. In its comments on the draft report, the Bureau of Administration agreed with the recommendation. OIG considers the recommendation resolved. The bureau's response to the 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

The Federal Records Act requires the head of each agency to preserve records containing adequate and proper documentation of the organization and of functions, policies, decisions, procedures, and essential transactions of the agency.¹ Department of State (Department) standards for records management are outlined in 5 Foreign Affairs Manual (FAM) 400 and 5 Foreign Affairs Handbook (FAH)-4.

A/GIS/IPS is the Department's designated records office and the principal advising office on all matters concerning records management. The office manages and supports the implementation of records management policies and provides assistance to assigned records coordinators. A/GIS/IPS also serves as the Department's liaison for reporting on and scheduling records management activities and transferring permanent records to the Federal Records Center.

Each overseas post is responsible for implementing and administering the records policies, standards, and procedures set forth in 5 FAM 400 and 5 FAH-4. Per 5 FAM 413, Department overseas posts are required to develop a records lifecycle process to create and preserve records and to establish effective management controls in the creation, maintenance and use, and disposition of records in the conduct of Department business. In addition, according to 5 FAM 414.5, each overseas post shall appoint a records coordinator responsible for coordinating records management activities. At overseas posts, the Information Management Officer or a senior information management staff member is typically designated as the records

¹ 44 U.S.C. §§ 3101-3107 (2017).

coordinator. The records coordinator is responsible for reviewing records systems and ensuring compliance with Department policies, including instituting appropriate records disposition schedules. Although A/GIS/IPS provides general records management assistance to overseas posts, each post is responsible for managing its records and ensuring compliance with Department policies.

OIG has specifically identified deficiencies related to performance of records management responsibilities as an information management challenge for the Department. In fact, the 2019 *Inspector General Statement on the Department of State's Major Management and Performance Challenges* cites "Information Security and Management" as a major Department challenge.² Although OIG inspection reports have highlighted improvements needed to correct records management deficiencies at specific overseas missions, OIG has not conducted a Department-wide review of records management. This management assistance report seeks to determine underlying factors contributing to deficiencies in records management responsibilities at overseas posts and to bring systemic issues associated with records management to the attention of Department senior leadership for correction.

FINDING

OIG reviewed 51 overseas inspection reports issued from October 1, 2016, to September 30, 2019, and identified 23 findings involving records management deficiencies. These findings included lack of organization and disposal of files, as required by Department standards; improper archiving of old files and records; and a lack of understanding by staff on how files and records should be maintained according to standards. OIG inspection reports also identified several reasons for these records management deficiencies, including lack of understanding by designated records management personnel of their responsibilities, insufficient training for records management personnel to address post-specific concerns, and lack of management oversight.

Lack of Regular Communication and Individualized Support for Overseas Staff Assigned Records Management Responsibilities

A/GIS/IPS informed OIG of several efforts the office had taken since 2016 to increase outreach and training to individuals designated with records management responsibilities. For example, from 2018 to 2020, A/GIS/IPS sent Department-wide cables and participated in regular meetings with Department personnel to address their records management challenges. In addition, A/GIS/IPS increased records management training for Department personnel through Foreign Service Institute classroom and online courses, including courses tailored for office management specialists, mid- and senior-level information resource management personnel, and new Civil Service employees. Despite these efforts, OIG continued to identify records management deficiencies during its overseas inspections, including overseas records management personnel who were unaware how to perform required tasks.

² OIG, *Inspector General Statement on the Department of State's Major Management and Performance Challenges* (2019).

Since December 2019, the Department has required all Department personnel to complete an online records management course within 10 days of entry on duty with the Department and annually thereafter.³ The course provides high-level, overarching training on records management responsibilities; however, the training does not provide designated records management personnel with hands-on exercises and detailed instruction on organizing, archiving, and disposing of records at their individual posts.

OIG found that A/GIS/IPS did not communicate regularly or provide individualized support to designated records management personnel at overseas posts. A/GIS/IPS reported to OIG that it considered creating a team to travel regularly to overseas posts to provide individualized assistance; however, the office was unable to do so because of budget constraints. Given its resource limitations, OIG determined that, in many circumstances, A/GIS/IPS could use alternative means of communication, such as digital video conferencing or one-on-one phone meetings, to provide efficient and timely support to overseas posts. In addition, establishing a schedule for regular communication with overseas posts would provide designated records management personnel with a mechanism to voice their concerns and ask questions relevant to their individual posts.

In accordance with 13 FAM 101.2-2(E)(1), managers are responsible for ensuring that employees receive training for effective job performance. Also, the Government Accountability Office's *Standards for Internal Control in the Federal Government*, Principle 4 states that management should enable individuals to develop competencies needed for their roles by giving tailored training to assist personnel to achieve the entity's objectives.⁴ Without a records management program that complies with organization, oversight, and records retention standards, Department bureaus and overseas posts are vulnerable to inefficient information retrieval and loss of critical documentation. Individualized support and regular contact with overseas records management personnel would increase the ability of staff to perform their duties effectively and reduce the occurrence of deficiencies.

Recommendation 1: The Bureau of Administration should implement a plan to regularly communicate with and provide individualized support for overseas records management personnel. (Action: A)

³ Cable 19 STATE 129976, "Annual Mandatory Courses That Will Affect OpenNet Access," December 12, 2019.

⁴ Government Accountability Office *Standards for Internal Control in the Federal Government*, 30-31 (GAO-14-704G, September 2014).

RECOMMENDATION

OIG provided a draft of this report to Department stakeholders for their review and comment on the finding and recommendation. OIG issued the following recommendation to the Bureau of Administration. The bureau's complete response can be found in Appendix B.

Recommendation 1: The Bureau of Administration should implement a plan to regularly communicate with and provide individualized support for overseas records management personnel. (Action: A)

Management Response: In its September 8, 2020, 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 a plan to regularly communicate with and provide individualized support for overseas records management personnel.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This review was conducted from January 27 to March 26, 2020, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 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 reported records management deficiencies.

OIG's specific objectives for this management assistance report are to determine (1) what findings related to records management deficiencies were reported in OIG inspection reports issued in FY 2017, FY 2018, and FY 2019; and (2) what underlying factors contributed to or caused the records management deficiencies.

OIG reviewed all overseas inspection reports issued from October 1, 2016, to September 30, 2019. OIG used professional judgment, along with documentary, testimonial, and analytical evidence collected or generated, to develop its finding and an actionable recommendation.

Craig Cheney and Vandana Patel conducted this review. Cindy Cobham, Barbara Keller, Rebecca Sawyer, and Patricia Stewart also contributed to this report.

APPENDIX B: MANAGEMENT RESPONSE



United States Department of State

Washington, D.C. 20520

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September 8, 2020

TO: OIG – Sandra Lewis

FROM: A/GIS – Eric F. Stein, Acting

SUBJECT: (U) Response to the August 2020 draft OIG Management Assistance Report: Deficiencies in Overseas Records Management

BLUF: (U) The Bureau of Administration has reviewed the draft OIG Management Assistance Report (ISP-20-25) and concurs with the recommendation regarding records management.

(U) The Bureau of Administration (A Bureau) has reviewed the draft OIG Management Assistance Report on Deficiencies in Overseas records management. We concur with the OIG’s recommendation and provide the following comments in response:

(U) **OIG Recommendation 1:** The Bureau of Administration should implement a plan to regularly communicate with and provide individualized support for overseas records management personnel. (Action: A)

(U) **Management Response:** A Bureau concurs with the recommendation. The Bureau will draft a written plan to regularly communicate with and directly support personnel at overseas posts to fulfill their records management responsibilities. The plan will supplement the Bureau’s existing successful records management efforts, which include mandatory annual records management training (PK217) (taken by over 67,300 employees in 2019 and 54,600 employees so far in 2020); regular Records Management guidance issued via ALDACs, Department Notices and other guidance documents concerning records management found on the Records Management intranet site dating back to 2016; and the Records Retirement Compliance tracker, which A Bureau uses to reach out to non-compliant posts on a biannual basis, and other guidance documents. The elements and objectives of the prospective plan will include the following:

1. **Increase awareness of existing records resources for overseas records management personnel.** A Bureau intends to send out a further Department Notice and ALDAC compiling and sharing existing records management guidance available on the intranet for overseas records management personnel. For example, there are previously issued

guidance documents titled “How to Organize and Manage Post Electronic Records,” “How to Retire Records,” and “Records Do’s and Don’ts.” (Tab)

2. **Enhance training and reference materials.** A Bureau will create standalone handbook summarizing content from FSI’s role-based records management courses that can serve as a reference resource for overseas personnel.
 - a. Target timeframe for handbook completion and posting to intranet site is December 2020.
3. **Increase global outreach.** A Bureau will schedule a series of practical records briefings with each Regional Executive Office reviewing records management responsibilities, fielding any records-related questions, and emphasizing the resources listed in #1 above. Additionally, in 2021, the Bureau will virtually host a records management conference for posts to directly interface with A Bureau’s Records Management Officials. The Bureau will evaluate the success of the conference and potential areas for improvement, and may hold similar conferences on an annual or bi-annual basis moving forward.
 - a. Target timeframe for the briefings series is January and February 2021.
 - b. Target timeframe to host the first conference is March 2021 and may repeat every six months to a year thereafter depending upon the evaluation of the first conference.
4. **Establish a Community of Practice.** A Bureau will establish a “Community of Practice,” a space for those who face a similar challenge,” on the Records Management intranet site. The Community will provide a structured forum where officials can interact directly with each other and with A Bureau’s records management personnel to collaboratively address recordkeeping questions and challenges at post.
 - a. Target timeframe for Community of Practice launch is February 2021.

Attachments:

Records Management Dos and Don’ts



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