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Records Management Program

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NATIONAL GUARD BUREAU RECORDS MANAGEMENT PROGRAM

INSPECTION REPORT

INTRODUCTION

The National Archives and Records Administration (NARA) is responsible for assessing the proper management of records in all media within Federal agencies to protect rights, assure government accountability, and preserve and make available records of enduring value.¹ In this capacity, and based on authority granted by 44 United States Code (U.S.C.) 2904(c)(7) and 2906, NARA inspects the records management programs of agencies to ensure compliance with Federal statutes and regulations and to investigate specific issues or concerns. NARA then works with agencies, if necessary, to make improvements to their programs based on inspection findings and recommendations.

In February and March 2018, NARA inspected the records management (RM) program of the National Guard Bureau (NGB) as part of a multi-year plan to inspect the RM programs of the Department of Defense (DOD) components. The purpose of this inspection was to examine how well the NGB complies with Federal records management statutes and regulations and to assess the effectiveness of its records management policies and procedures. In particular, it focused on the management of records in the three National Guard components: National Guard Bureau Joint Staff (NGBJS), Army National Guard (ARNG) and Air Force National Guard (ANG). The inspection looked at basic records management practices at each component with emphasis being placed on organizational structure, policies, planning, training, and electronic records, including email. Additionally, it sought to identify practices of interest to other DOD agencies and the wider Federal records management community.

GENERAL SUMMARY STATEMENT ON COMPLIANCE

The NGB essentially has three separate RM programs. Of the three, ANG is mostly compliant with Federal records management statutes and regulations, while ARNG must enact numerous improvements to its program to meet the requirements of 36 Code of Federal Regulations (CFR) Chapter XII, Subchapter B.² The third program, NGBJS, is in the very early stages of development and does not yet comply with Federal records management regulations. Failure to manage records in a compliant manner increases the risk that records will not be readily accessible for supporting NGB's mission essential functions to DOD and other Federal agencies, and for accountability to Congress and the public. It also increases the risk of the loss of Federal records, including NGB personnel records, and that permanent records may not be retained for eventual transfer to the National Archives, as required by 44 U.S.C. 3101.³ To help mitigate the risks associated with noncompliance with Federal records management statutes and regulations

¹ 44 U.S.C. Chapter 29, <https://www.archives.gov/about/laws/records-management.html>.

² 36 CFR Chapter XII, Subchapter B, <https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title36/36CXIIsubchapB.tpl>.

³ 44 U.S.C. Chapter 31, <https://www.archives.gov/about/laws/fed-agencies.html>.

this report makes recommendations for the NGB as a whole and some specific to each component. Follow-up actions required for NGB and NARA are included in Appendix C.

OVERVIEW OF THE NGB AND THE NGB RECORDS MANAGEMENT (RM) PROGRAM

The RM program of the NGB is unique from other DOD RM programs because of the organizational structure of the Guard. The NGB is comprised of 400,000 service members who serve in three separate components - NGBJS, ARNG, and ANG. Service in these components can be on active Federal status (U.S. Code Title 10), State status (U.S. Code Title 32) or State Active Duty status. This complicates records management for the NGB as Guard personnel must determine whether the records from the same records series are Federal or State records. In the age of electronic recordkeeping, this may be less of a challenge than in paper recordkeeping systems.

The NGB RM program is relatively new. It was established by DOD Directive (DODD) 5105.77 in October 2015.⁴ Prior to the issuance of DODD 5105.77, the NGB RM program adhered to the policies and procedures of the Department of the Army (DA) RM program. In December 2016, the Chief of the National Guard Bureau (CNGB) established operational policies for the NGB RM program under CNGB Instruction (CNGBI) 5001.01.

CNGBI 5001.01 gave the CNGB and a senior agency official authority over the entire National Guard RM program.⁵ In addition, a single Agency Records Officer (ARO) was designated to NARA in accordance with 36 CFR 1220.34(a). Currently the ARO primarily serves as the Records Officer (RO) for NGBJS with limited authority over ARNG and ANG. Both ARNG and ANG maintain separate ROs since CNGBI 5001.01 specifically states that those components must continue to comply with the records management guidelines of their respective Services.

This structure causes major differences in how each component manages its records program and does not provide for coordinated oversight of the three RM programs. This lack of cohesion and collaboration puts the NGB at risk of non-compliance with Federal, and possibly State, records statutes and regulations as illustrated in the following section.

FINDINGS AND RECOMMENDATIONS

ORGANIZATIONAL STRUCTURE AND STRATEGIC DIRECTION

Finding 1: The NGB RM program lacks organizational clarity for the purposes of collaboration and coordination.

CNGBI 5001.01 established a single RM program for the NGB while recognizing that ARNG and ANG must adhere to their Service-specific RM guidelines. CNGBI 5001.01 also established the position of a NGB Records Management Officer (RMO), who is currently the designated

⁴ DOD 5105.77 established NGB as a joint activity of DOD with authority over NGBJS, ARNG, and ANG.

⁵ The NGB senior agency official designated in CNGBI 5001.01 is an internal position and is not to be confused with the designated Senior Agency Official for Records Management (SAORM) required by OMB/NARA *Managing Government Records Directive* (M-12-18).

ARO, but did not clearly define the roles and responsibilities of this position in relation to the existing RM programs at ARNG and ANG, or its authority over agency records management matters in general.

Because of the uncertainty regarding his role, the RMO currently assigned to NGB exercises very limited authority or responsibilities outside of developing a RM program for the Joint Staff and the Office of the Chief of NGB and has limited interaction with the other two program officers. In essence, he functions as the NGBJS RMO. He was hired on a term appointment, which also hinders his effectiveness. The RMO should be a permanent, full-time Federal employee with the ability to speak for all three programs when reporting to NGB leadership on policy, procedures, records scheduling, staffing, and training.

The creation of a well-defined NGB RMO position could help the three RM programs collaborate on common goals and problems. For example, the NGB RMO, in coordination with the ARNG and ANG ROs, could determine that the NGBJS should operate under a combined records schedule based on the Army Records and Information Management System (ARIMS) and the Air Force Records and Information Management System (AFRIMS). This combined system could maintain NGB records until transferred to their parent Services or to the National Archives, when eligible for disposition. In the absence of a well-defined RMO position, NGB senior leadership should encourage the three RM programs to collaborate and cooperate on common plans and objectives.

Recommendation 1.1: To develop, implement, and maintain an active and continuing records management program for the National Guard, as prescribed by DODD 5105.77 and CNGBI 5001.01, the CNGB must ensure that the Agency Records Officer designated to NARA is a permanent, full-time Federal employee. (36 CFR 1220.34(a))

Recommendation 1.2: The CNGB, as the senior official responsible for RM under CNGBI 5001.01, must clarify the agency records management directive or instruction to define the roles and responsibilities of the Agency RMO and the relationship of this position to the ARNG and ANG Records Managers. (36 CFR 1220.34(c))

Recommendation 1.3: Under the direction of the CNGB, the NGB should create a working group of the ROs from NGBJS, ARNG, and ANG to work on common RM program goals and objectives.

Finding 2: Senior leadership within the NGB and the DOD does not foster strategic coordination between the three NGB RM programs.

As currently configured, the NGB RM program lacks dedicated advocacy and support from senior leadership at DOD, the Department of the Army, the Department of the Air Force (DAF), and the NGB. Without this level of leadership, the agency is struggling to implement the basic provisions of DODD 5105.77 and CNGBI 5001.01. While the RM program of the ANG is functioning at a proficient level, the ARNG program faces difficulties in implementing basic Army records management regulations. The NGBJS program is being developed with the issuance of instructions, the appointment of an RMO, and the assignment of records management

duties to program staff. None of the programs have strategic direction that would normally come down through senior leadership. Due to the complexity of the NGB, it is essential that senior leadership direct the three RM programs to coordinate to create a strategic plan for developing, implementing, and maintaining a compliant RM program for the entire agency.

With the issuance of the Office of Management and Budget (OMB)/NARA *Managing Government Records Directive* (M-12-18), NARA and OMB established the position of the Senior Agency Official for Records Management (SAORM) for all Executive Branch Departments. NARA Bulletin 2017-02 further outlines the responsibilities of the SAORM, including setting the vision and strategic direction of the RM program.⁶ Departments and agencies have flexibility in the appointment of these officials as long as they are placed high enough in the organization to be able to directly engage with, if not report to, the agency head and other senior staff in strategic planning for the RM program.

In accordance with M-12-18, the DOD has created nine SAORM positions within the Department. The NGB is assigned to the component SAORM for DOD Independent Agencies. The NGB RMO has not interacted with the DOD SAORM for Independent Agencies, but is seeking program support and guidance from the office of the DOD Chief Information Officer (CIO). The ARNG and ANG reported limited engagement with the component SAORMs for the Army and the Air Force.

It is worth considering that, due to its size and complexity, the NGB should have its own SAORM. CNGBI 5001.01 designates a NGB senior agency official to oversee the RM program that could become equivalent to an SAORM; however, this position remains unfilled. Without someone at this level of authority, there is no clear senior leadership path for any of the NGB ROs to follow to gain support for records management strategies and initiatives within the NGB. This senior level support is critical for establishing a RM program, as directed by CNGBI 5001.01, which complies with 36 CFR Chapter XII.

Recommendation 2.1: Senior leadership within the NGB should provide direction and support to the NGB RM program by filling the senior agency official position designated in CNGBI 5001.01.

Recommendation 2.2: The NGB should create a strategic plan for developing, implementing and maintaining a compliant RM program for the entire agency in accordance with 36 CFR Chapter XII Subchapter B, OMB Circular A-130, and CNGBI 5001.01.

Recommendation 2.3: Senior leadership within NGB must formalize routine engagement with the DOD SAORM for Independent Agencies. (OMB Circular A-130 and NARA Bulletin 2017-02)

Recommendation 2.4: NGB should consider requesting that DOD appoint a SAORM for the NGB.

⁶ <https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html>.

NGBJS RM PROGRAM

Finding 3: Specific requirements are not in place for the NGBJS RM program to be compliant with Federal statutes and regulations or DOD directives and instructions.

Of the three components evaluated by the NARA inspection team, the NGBJS RM program faces the most significant challenges. Because it was only formally established by CNGBI 5001.01 in December 2016, the NGBJS RM program is currently not in compliance with 36 CFR 1220 Subpart B, *Agency Records Management Responsibilities*. This section of the CFR defines basic agency responsibilities for carrying out the requirements of 44 U.S.C. 3101 and 3102, and provides the building blocks for the establishment of a RM program. The NGBJS RMO is acutely aware of these deficiencies and is working to remediate them. With this in mind, the following recommendation focuses on basic program requirements listed in 36 CFR 1220.34, *What must an Agency do to carry out its records management responsibilities*, along with some larger structural activities, with the assumption that a follow-up program evaluation will take place within an agreed upon timeframe. Initial actions needed to establish a compliant records management program are included as Appendix E.

Recommendation 3: The NGBJS must develop and implement a comprehensive plan to create, implement, and maintain a RM program in accordance with 36 CFR 1220 Subpart B and CNGBI 5001.01.

Finding 4: The NGBJS does not have a coordinated policy regarding FOIA requests and litigation holds.

The NGBJS Office of Information and Privacy (OIP) coordinates the fulfillment of Freedom of Information Act (FOIA) requests between NGBJS, ARNG, and ANG. FOIA requests received by the ARNG and ANG are compiled by the units they concern and forwarded to the OIP for response to the requestor. OIP also coordinates litigation holds for the NGB. This collaborative relationship has been successful, but is currently performed without complete policies and procedures in place to ensure that it is formally implemented in NGB. NGB should work to ensure that these policies and procedures are put into place either by a directive or an instruction.

Recommendation 4: In coordination with ARNG and ANG, NGBJS should establish written policies and procedures for FOIA requests and litigation holds.

Finding 5: The NGBJS RM program does not ensure that records management is included in the development of electronic information systems (EIS).

While the NGBJS utilizes many DOD EIS, including its email system, to conduct business, it does not have policies and procedures in place to ensure that the requirements of DOD 5015.02 STD, *Design Criteria Standards for Electronic Records Management Software Applications*, are incorporated into its own EIS development process. While many of the EIS developed by the NGBJS are tasking or tracker systems, they are unaccounted for by the RM program and do not adhere to retention schedules.

For example, the Joint Information Exchange Environment (JIEE) was developed without NGBJS RM input into the design and implementation of the system. JIEE is a web-based information sharing solution for use during joint operation events by NGBJS and Joint Force Headquarters (JFHQ) in each State. A seven-year retention for information housed in the system was discussed with the NARA inspection team, though the system has not been scheduled by the National Archives. Currently, data in the system is being maintained in accordance with a 'Do Not Destroy' order issued by the NGBJS RMO. Another system, the Joint Application Staff Management System (JASMS), was developed and decommissioned without input from RM staff. JASMS was the primary NGB task management system for processing unclassified actions. The system, now inactive, still contains records that are not easily accessible for FOIA and other legal purposes by NGBJS RM staff or other NGB personnel.

Failure to notify NGBJS RM personnel when EIS are developed or migrated increases the risk of records not being accessible throughout their retention period and prevents the NGB RM personnel from scheduling new systems. In addition, failure to inform NGB RM personnel when EIS are decommissioned significantly increases the risk of unauthorized disposition or other mismanagement of records.

Recommendation 5: NGBJS RM staff must be formally included in the design, development, implementation, migration, and decommissioning of EIS. (DOD 5015.02 STD, 36 CFR 1220.34(e), 36 CFR 1236.6(b), 36 CFR 1236.10, and OMB Circular A-130)

ARNG RM PROGRAM

The ARNG RM program is the oldest program in the NGB and is well supported by Army RM regulations, AR 25-1 and AR 25-400-2, and instruction, DA PAM-403. These regulations were supplemented by an ARNG RM Standard Operating Procedure (SOP) issued on October 11, 2013, which outlined roles and responsibilities for ARNG RM staff at Arlington Hall Station (AHS).

Though policies and procedures are in place for ARNG RM, the NARA inspection team noted deficiencies in the program because of a lack of resource allocation and programmatic support for RM within the command. In addition, there is limited communication between the ARNG RO and the Army RO. Therefore, findings and recommendations for the ARNG require a command leadership review to determine how resources and programmatic support for the RM program can be obtained to meet the basic requirements of 44 U.S.C. 3101 and 3102 as outlined in 36 CFR 1220 Subpart B, *Agency Records Management Responsibilities*.

Finding 6: The ARNG RO does not have the resources to provide oversight for the program in accordance with the ARNG RM SOP of October 11, 2013, AR 25-1, and AR 25-400-2.

44 U.S.C. 3102 requires Federal agencies to create effective controls over the creation, maintenance, and use of records in the conduct of business. An essential part of these controls is the appointment of adequate staff to ensure that a RM program can apply standards, procedures, and techniques designed to improve the management of records, promote the maintenance and

security of records deemed appropriate for preservation, and facilitate the segregation and destruction of records of temporary value.

At present, there is one staff member assigned to oversee RM program operations for the entire ARNG. This staff member is not dedicated to records management on a full-time basis, but divides his time providing administrative oversight for records management, budgetary matters, postal services, printing services, and publication services. As configured, the ARNG RM program cannot provide effective controls for Federal RM to Army Guard units in the 54 states and territories and the District of Columbia.

The ARNG RM SOP indicates the need for at least two people (a principal and an alternate) to be assigned as Records Administrators for the 54 states and territories and the District of Columbia. The Records Administrator is to be the focal point for records management matters throughout the ARNG. The assignment of one person, on a part-time basis, to carry out oversight duties for the entire ARNG puts the agency at risk of being unable to fulfill its responsibilities under 44 U.S.C. 3102 and DODD 5105.77.

Recommendation 6: The ARNG must review current staffing and oversight of the RM program to ensure that it meets the requirements of the ARNG RM SOP or develop procedures to provide effective program controls to meet the requirements of 44 U.S.C. 3102.

Finding 7: The ARNG has not adequately staffed the RM program at the installation or unit level in accordance with AR 25-1 and 36 CFR 1220.34(d).

The NARA inspection team visited ARNG elements at NGB offices and field units in Georgia, Massachusetts, South Carolina, and Texas (for details see Appendix A). In addition, the team received ARNG administrative inspection reports for Colorado and Illinois. In each program, adequate personnel resources were not assigned to ensure recordkeeping requirements were incorporated into agency programs, processes, systems, and procedures.

The ARNG RM SOP only applies to staffing roles and responsibilities for ARNG staff at AHS. In the absence of specific records management staffing instructions outside of AHS, the ARNG should utilize AR 25-1 and AR 25-400-2 to fulfill records management roles and responsibilities in the 54 states and territories and the District of Columbia.

In accordance with the ARNG RM SOP, AR 25-1, and AR 25-400-2, the ARNG RM program should have Records Managers, Record Custodians and Action Officers designated throughout the agency with the following areas of responsibility:

- Records Managers are subject matter experts who direct their command, agency, or installation's RM program.
- Records Custodians are subject matter experts at the user level who ensure that RM procedures are implemented throughout their unit or office.
- Action Officers include any individual who creates records on behalf of the ARNG.

Records Managers were encountered at installations visited during the course of the inspection, but less than 10% of their time was dedicated to records management duties. Even when assigned to records management responsibilities, the personnel dedicated to these positions usually did them as a 3rd or 4th tier duty behind other administrative functions, when they were performed at all. Additionally, personnel assigned as Records Managers were not placed high enough within the organization to ensure proper visibility for the RM program with senior leadership. This shortcoming means that Records Managers are often unwilling or unable to address RM program needs with senior leadership. Records Custodians were not assigned in all offices at ARNG AHS, nor were they present in all field locations. Named Action Officers were not encountered in the course of the inspection, though they are included in records management evaluations conducted by Administrative Services.

Recommendation 7: The ARNG must develop procedures that institute the roles and responsibilities for Records Managers and Records Custodians, as outlined in AR 25-1, throughout the organization to staff its program effectively. (36 CFR 1220.34(d))

Finding 8: The ARNG does not have effective control of Federal records in its custody.

Site visits by the NARA inspection team revealed a systemic lack of physical and intellectual control of Federal records, both paper and electronic, among ARNG units and offices. In two cases, NARA inspection teams visited Records Holding Areas (RHA) that contained significant volumes of unidentified Federal records. Paper records were stored in offices and storage areas that had not been identified or inventoried due to staffing shortages or a lack of institutional knowledge about the records. At all locations, unstructured shared drives were utilized to maintain active and inactive records without RM program input or oversight. Information Management (G-6) staff in two states stated that old data was stored with no knowledge of its status or retention periods.

ARNG is required to follow Army records retention schedules and use ARIMs to manage records. Absent a specific SOP for ARNG units outside of Arlington Hall Station, all ARNG field activities should be following the dictates of AR 25-400-2. According to AR 25-400-2, all units and offices should have Office Records Lists (ORL) that list all records series, paper and electronic, with NARA-approved dispositions and retentions. These lists should be entered into ARIMS and provide the basis for records control throughout units and offices. The use of ARIMS is mandatory. ARIMS has records management functions that are not being fully utilized by ARNG. Field units have not completely populated the system with ORLs and other recordkeeping information required for the system to be effective. Conducting an inventory to ensure ORLs completely identify records and their locations, plus proper use of ARIMS, would enhance ARNG's ability to have proper intellectual and physical control of Federal records in its custody.

Recommendation 8: ARNG RM must develop a plan to conduct a complete inventory of ARNG records in both paper and electronic format in order to meet the requirements of AR 25-400-2 and 36 CFR 1220.34(i).

Finding 9: The ARNG retains paper copies of permanent Official Military Personnel Files (OMPFs) beyond their scheduled cutoff and transfer dates.

Federal records schedule N1-330-04-01 designated all OMPFs as permanent records with a 62-year cutoff prior to transfer to the legal custody of the National Archives. This includes National Guard personnel while they are in Title 10 or Federal status. However, the ARNG continues to maintain OMPFs in paper format dating back to World War I in some cases.

The primary reason ARNG maintains these personnel files is because many of the OMPFs in their custody contain a mix of Federal and State records arising from a service member's duty assignments under Title 10 and Title 32 or State status. A service member's personnel records while in Title 32 status remain in the custody of the State of creation. Because final ownership of these records is unclear, the National Archives is hesitant to take custody of the files. Inspection team reviews of individual personnel files determined that the ARNG would have difficulty separating Title 10 from Title 32 records due to the extent of commingling in the records.

For example, the NARA inspection team reviewed ARNG personnel files in RHA facilities in both South Carolina and Texas. At Camp Mabry, in Austin, Texas, the team found over 1,000 cubic feet of records dating as far back as 1910 and as recent as the 1990s for Texas Cavalry and Infantry. The personnel records reviewed included commingled Federal and State records. A large number of the more recent records have been microfilmed, but there are concerns about the quality of the filming. The staff at the RHA at Camp Mabry also thought the filming was selective, but were unsure whether it was only Federal or State records that were filmed or some combination of both.

The inspection team found a similar situation at the JFHQ in Columbia, South Carolina. Personnel files stored at the JFHQ in Columbia dated back to World War I. They also included roughly 500 cubic feet of commingled State and Federal personnel files and, while a portion of the files were scanned in the past, the scans were of poor quality and cannot be accessed due to contract software issues. The personnel files had outdated finding aids that appeared to lack controls and had gaps.

Current issues resulting from the mixing of Title 10 and Title 32 personnel records could be resolved by the use of electronic records systems, such as the Integrated Personnel Records Management System (iPERMS), where both Federal and State records management entities could maintain copies of everything regardless of status. However, the existing paper records present a challenge to ARNG RM that needs to be addressed in a coordinated manner with the National Archives and the States because of the difficulty of separating Title 10 records from Title 32 records.

One solution that ARNG might consider is to scan the existing paper personnel records according to NARA standards and regulations. Once scanned, the ARNG and NARA can determine the final disposition of the paper. No matter how the ARNG decides to handle the paper records in the future, there is an immediate need for the proper intellectual control and maintenance of these records. It is critical to active duty members and veterans who need their personnel information for the ARNG to know where records of specific individuals are being maintained, and that they are properly cared for by agency components.

Recommendation 9.1: ARNG must conduct an inventory of OMPFs in all formats at ARNG facilities. (36 CFR 1220.34(i))

Recommendation 9.2: ARNG RO must develop and implement a plan to transfer OMPFs to a designated Federal or State archival institution according to approved records schedules. (36 CFR 1226.22)

Finding 10: The ARNG is not providing proper oversight of RHAs and is not storing records in accordance with AR 25-1 and 36 CFR 1234.

As noted in Findings 8 and 9, the NARA inspection team visited RHAs in South Carolina and Texas. In both instances, the RHAs were not maintained in accordance with standards outlined in AR 25-1 and 36 CFR 1234.10. The facilities at both locations are in need of a safety inspection. Both lacked adequate climate controls and fire suppression systems, and both presented hazardous conditions for both staff and records.

Records storage conditions in the RHA at Camp Mabry, Texas, are not compliant with Federal regulations. The oldest records were stored in filing cabinets, the rest in boxes, with many loose files on top of cabinets and shelves. While there are plans to renovate the building it is currently not climate controlled. There is also no complete inventory of the records stored in the building.

A similar situation was found at the JFHQ in Columbia, South Carolina. The building did not have adequate climate controls, while the wooden shelving used to hold the records was not anchored properly to the walls and was leaning inward creating the potential to collapse. The RHA also showed signs of water penetration that may also indicate previous damage to records.

At the JFHQ in Massachusetts, records were stored in the administrative building without adequate controls and oversight. A similar situation was reported in Colorado and at ARNG AHS units. After interviewing ARNG staff, the inspection team feels that these are not isolated instances and that there are probably RHAs with similar conditions at ARNG locations around the country.

Recommendation 10.1: The ARNG must inspect RHAs at all ARNG installations to determine the safety of these structures as well as the adequacy or need for these facilities to store permanent or long-term temporary records. (AR 25-1 and 36 CFR 1234)

Recommendation 10.2: The ARNG must create and implement procedures to ensure the proper storage of records at installations without a RHA, including instructions for the destruction of records according to approved records schedules or transfer to an approved storage area for long-term storage in accordance with AR 25-1, DA PAM-403, and 36 CFR 1234.

Finding 11: Current evaluation procedures are not focused on records management and do not provide a detailed RM program overview to senior leadership at the ARNG.

Currently, administrative reviews of ARNG units and offices in all 54 states and territories and the District of Columbia are performed by Command Management Assistance Team (CMAT) staff. These reviews are conducted on a triennial basis in accordance with AR 25-1 and cover all administrative services functions of a unit or office such as printing operations, mailroom operations and funds management. There is a records management checklist that is issued in advance of the review, and training is offered to each unit visited. The records management reviews are conducted by the Assistant Chief for Administrative Services and typically provide plans of corrective action to the units and offices visited. Upon completion, the review is forwarded to the unit commander or office head.

The reviews conducted by CMAT are beneficial, but they are not specific to records management and are not compiled so as to provide a comprehensive program overview to senior leadership at the ARNG. There are simply too many ARNG units to review for CMAT staff to provide an effective evaluation of agency records management practices to senior leadership at the ARNG in a timely manner. Additionally, there is not an adequate organizational structure for the review team to bring systemic problems to the attention of senior leadership.

As noted in Findings 6 and 7, ARNG activities, installations, and units should have designated Records Administrators, Records Managers, and Records Coordinators. According to AR 25-400-2 and DA Pamphlet (PAM) 25-403, these officials should also conduct records management evaluations of their organizations. Without these officials in place throughout the ARNG, it is difficult for CMAT staff to collect evaluation data on the RM program without physically visiting all 54 states, territories, and the District of Columbia. If these positions were filled, CMAT staff could review and compile the results of local records management evaluations and make program recommendations to senior leadership at ARNG.

Recommendation 11.1: ARNG should update evaluation procedures to focus on records management and provide a detailed overview of evaluations to senior leadership at the ARNG. (36 CFR 1220.34(j))

Recommendation 11.2: ARNG procedures should include monitored plans of corrective action.

Finding 12: Other requirements are not in place for the ARNG RM program to be compliant with Federal statutes and regulations.

The ARNG RM program is missing the following elements:

- RM directives to create program objectives, responsibilities, and authorities for the

creation, maintenance, and disposition of agency records are not executed consistently across the agency. (36 CFR 1220.34(c))

- Training on RM policies, including email and the use of ARIMS, is not conducted consistently across the organization. (36 CFR 1236.22 and AR 25-400-2)
- Vital (essential) records are not identified as part of agency emergency management functions. (36 CFR 1223.16)
- Exit briefings are not conducted to ensure that departing officials and employees do not remove Federal records from agency custody. (36 CFR 1222.24(a)(6))
- ARNG RM has not been integrated into the design, development, implementation, migration, and decommissioning of EIS in accordance with 36 CFR 1220.34(e), 36 CFR 1236, and DOD 5015.02 STD.

Recommendation 12: Army records management policies and directives for recordkeeping, training, vital (essential) records, exit briefings, and EIS must be implemented by ARNG RM. (36 CFR 1220.34(c))

ANG RM PROGRAM

Of the three NGB programs visited, the ANG had the strongest records management structure. The ANG follows Air Force (AF) records management policies and procedures as outlined in Air Force Instruction (AFI) 33-322 and Air Force Manual (AFMAN) 33-363. Records management has traditionally been strong at AF with a centralized program structure and cascading records management duties throughout the service. In addition, the ANG Command Records Manager (CRM) communicates regularly with the Air Force RO and receives sufficient senior-level support and resources from ANG and AF for the ANG RM program.

In August 2016, the Secretary of the Air Force (SecAF) issued a memorandum, “Reducing Additional Duties,” that essentially decentralized the RM program and pushed more oversight and control out to commanders and directors. The SecAF memorandum eliminated the positions of Chief Office of Records (COR), Functional Area Records Managers (FARM), and Records Custodians (RC) throughout the AF and ANG. The elimination of these duties disrupted the RM program, which necessitated a restructuring of records management throughout the AF. This reorganization is currently underway at AF and ANG. The inspection team was aware of the restructuring of the ANG RM program and was interested in how the SecAF Memorandum impacted records management operations at both ANG and in the field.

The NARA inspection team visited the Air National Guard Readiness Center (ANGRC) at Joint Base Andrews in Maryland and Wings in Georgia, Massachusetts, South Carolina, and Texas to gauge the impact of these changes on the ANG RM program. The inspection team found that while the SecAF Memorandum had decentralized records management operations throughout the ANG, the basic structure of RM had been maintained at the Wings. This was particularly true of Wings in the field where CORs, FARMs, and RCs had been eliminated in title, but base personnel continued to implement the records management functions required under the previous structure while awaiting the release of an updated ANG records management manual.

At the ANG, the CRM responded quickly to the SecAF memorandum and recently received approval for a new records management manual, Air National Guard Manual (ANGMAN) 33-363, *Management of Air National Guard Records*, which provides program guidance and procedures for the management of records in ANG organizations. ANGMAN 33-363 eliminates the requirement for individual ANG organizations to develop and maintain their own records management plan that is required by AFI 33-322. Commanders may choose to develop their own local RM programs, but must request a waiver from the CRM and present a plan of action for approval.

NARA's review of ANGMAN 33-363 found it to be essentially sound. Since this is a new manual, it is too soon for the inspection team to make specific findings or recommendations, other than that the ANG needs to monitor its impact on the program to determine what adjustments may need to be made.

Finding 13: ANG RM is not currently managing shared drives and the storage of electronic records in accordance with 36 CFR 1236.10, AFMAN 33-363, and ANGMAN 33-363.

The NARA inspection team noted in one of the Wings it visited that improvements to the management of electronic records on shared drives were needed. Units at the Wings were storing long-term temporary records on shared drives for extended periods of time. In one instance a unit was storing records dating back to 2002, while another unit was trying to determine a suitable way to store records with a 56-year retention. Storing long-term temporary records on shared drives indefinitely puts ANG records at risk of corruption, degradation, and inaccessibility when needed for operational, legal or FOIA purposes.

Although ANGMAN 33-363 does not address the question of long-term storage of electronic records, it does recommend the creation of a standard method of storing and organizing electronic files with the use of a consolidated shared drive. Currently, all Wings are conducting file inventories in order to create an official inventory of records and file structure. All electronic files will be stored in accordance with ARIMS table and rule dispositions. At the 104th Fighter Wing in Massachusetts, the Base Records Manager (BRM) has simplified the naming conventions for series titles provided in the AF table and rules to make them more intuitive for users.

The 104th Fighter Wing is also utilizing a program, TreeSize, to crawl the various drives to identify and eliminate duplicate and non-record files and identify those records that need to be transferred to the new consolidated shared drive. ANGMAN 33-363 recommends using this product to audit shared drives for adherence to AFRIMS records lifecycle requirements. Two BRMs have reported success using TreeSize to maintain oversight and to audit the electronic portion of the RM program.

Recommendation 13.1: The ANG CRM must create and implement policies and procedures that ensure the maintenance of records stored on shared drives in accordance with AFMAN 33-363 and 36 CFR 1236.10.

Recommendation 13.2: The ANG CRM must create and implement policies and procedures for auditing the use of shared drives in ANG units and directorates. (36 CFR 1236.10)

Recommendation 13.3: The ANG CRM should study long-term electronic records storage requirements for the ANG and make recommendations regarding adequate storage methods for electronic records.

Finding 14: The ANG CRM does not have an active role in the oversight and evaluation of the ANG RM program.

In line with AF policy, the ANG has a robust inspection and evaluation program that monitors records management activity in Wings and units. This program includes the Management Internal Control Toolset (MICT), which asks specific questions about the performance of the Wing Commander and the BRM in relation to their duties as assigned under AFI 33-322 and AFMAN 33-363. There are also Commanders Unit Effectiveness Inspections (UEI) that lead to a Capstone review every 24 to 30 months by the Inspector General (IG) office. These inspections provide a more intensive review of the effectiveness of the RM programs in the Wings. In the past, IG offices also did By-Law inspections of the ANG RM program, but recent decisions have eliminated RM from the roster.

These inspections provide an excellent ground-level view of the ANG RM program and allow for corrections to be made on a unit-by-unit basis. One problem area, however, is the monitoring of overall trends and issues at the CRM or program level. In the past, the CRM has received deficiency reports from IG offices, but has had difficulty in monitoring trends in RM across the ANG, and the CRM does not have the ability to conduct on-site reviews to ensure the effectiveness of various facets of the RM program such as policy implementation, training, and electronic records management. The inability to monitor trends and conduct on-site reviews limits the CRMs role and responsibility for evaluating the ANG RM program, providing status updates to senior ANG leaders, and applying improvements throughout the ANG. With the initiation of ANGMAN 33-363, and in the absence of IG By-Law inspections, it is important that the CRM has a larger role in program reviews and evaluations.

Recommendation 14.1: The ANG should require and fund RM inspections or evaluations by the CRM. (36 CFR 1220.34(j))

Recommendation 14.2: The ANG should grant the CRM full access to MICT and Capstone reports for program assessment and review purposes, and for implementing RM program improvements across the ANG.

Recommendation 14.3: The ANG should establish a procedure that includes records management status reports from the BRMs to the CRM.

Recommendation 14.4: The CRM should establish a procedure that includes periodic summary written reports on the status of the ANG RM program for agency senior leaders based on inspection or evaluation reports and BRM reports.

CONCLUSION

With over 400,000 service members, the NGB is one of the largest DOD components with a very complicated organizational structure. It comprises Joint Staff, Army, and Air Force elements whose members serve both Federal and State missions. Good records management and a coordinated RM program is essential to ensuring the availability of records for foreign and domestic missions.

Records management at the NGB reflects the complexity of the agency and the difficulty of coordinating programs among three organizations in different stages of development. Coordination of these programs necessitates organizational clarity and purposeful leadership to achieve success. DODI 5105.77 and CNGBI 5001.01 authorize the NGB to create a RM program, but it does not have the required support, direction and coordination by senior leadership to be effective. The lack of clarity and guidance from senior leadership has led to confusion among the three RM programs and prevents effective collaboration, consistency in records maintenance, access and disposition. The three components have no structure or incentive to work together. Ultimately, this weakens each program since there is no avenue to bring awareness to NGB leadership about needs and requirements of the RM program as a whole. The findings and recommendations in this report should be used as a roadmap to establish the comprehensive records management program that the NGB desires and that NARA requires.

APPENDIX A INSPECTION PROCESS

OBJECTIVE AND SCOPE

The objective of this inspection was to determine how well the NGB complies with Federal records management statutes and regulations and to assess the effectiveness of its RM policies and procedures.

METHODOLOGY

NARA carried out this inspection by conducting interviews at NGB and field locations in Georgia, Massachusetts, South Carolina, and Texas, with NGB RM and program staff, and by reviewing NGB's program documentation. More specifically, the inspection team:

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

OFFICES VISITED

NGBJS

NGB, Arlington Hall Station, Arlington, VA

ARNG Units

ARNG, Arlington Hall Station, Arlington, VA

JFHQ, NGMA, Concord, MA

JFHQ, NGGA, Marietta, GA

JFHQ, NGSC, Columbia, SC

59th Troop Aviation Troop Command, NGSC, McEntire Joint National Guard Base, Eastover, SC

Texas Army National Guard, NGTX, Camp Mabry, Austin, TX

ANG Units

ANG, Joint Base Andrews, MD

116th Air Control Wing, GAANG, Robins AFB, Warner Robins, GA

461st Air Control Wing, GAANG, Robins AFB, Warner Robins, GA

104th Fighter Wing, MAANG, Westfield-Barnes Regional Airport, Westfield, MA

ANG Readiness Center, ANGRC, Joint Base Andrews, MD

169th Fighter Wing, SCANG, McEntire Joint National Guard Base, Eastover, SC

245th Air Traffic Control Squadron, SCANG, McEntire Joint National Guard Base, Eastover, SC

136th Airlift Wing, TXANG, Naval Air Station Fort Worth Joint Reserve Base, Ft. Worth, TX

APPENDIX B
RELEVANT INSPECTION DOCUMENTATION

AFI 33-322, "Records Management Program," April 26, 2018.

AFI 33-364, "Records Disposition-Procedures and Responsibilities," May 23, 2018.

AFI 38-206, "Additional Duty Management," May 6, 2014.

AFI 90-201, "The Air Force Inspection System," December 7, 2017.

AFMAN 33-363, "Management of Records," June 2, 2017.

ANGMAN 33-363, "Management of Air National Guard Records," May 10, 2018.

ANGRC, "Records Management Plan," December 6, 2017.

AR 25-1, "Army Information Technology," June 25, 2013.

AR 25-400-2, "Army Records Information Management System (ARIMS)," October 2, 2007.

ARNG Records Management SOP, October 11, 2013.

CNGBI 1001.01, "National Guard Joint Force Headquarters-State," June 29, 2016.

CNGBI 5001.01, "National Guard Bureau Records Management Program," December 5, 2016.

DA PAM 25-403, "Guide to Recordkeeping in the Army," August 11, 2008.

DOD Directive 5105.77, "National Guard Bureau (NGB)," October 30, 2015.

DOD Instruction 5015.02, Incorporating Change 1, "DoD Records Management Program," August 17, 2017.

DOD Instruction 5200.01, "DOD Information Security Program and Protection of Sensitive Compartmented Information," April 21, 2016.

DOD 5015.02 Standard, "Design Criteria Standards for Electronic Records Management Software Applications," April 25, 2007.

Records Management - A Texas Military Department User Guide, Version 2018a, 2018.

SecAF Memorandum, "Reducing Additional Duties," August 18, 2016.

Texas Military Forces Records Management Training, 2018.

APPENDIX C AUTHORITIES AND FOLLOW-UP ACTIONS

AUTHORITIES

- 44 U.S.C. Chapter 29
- 36 CFR Chapter XII, Subchapter B
- 36 CFR 1239, Program Assistance and Inspections

OTHER GUIDANCE

- OMB/NARA *Managing Government Records Directive* (M-12-18)
- OMB/NARA *Guidance on Managing Email* (M-14-16)
- Other NARA Bulletins currently in effect - <https://www.archives.gov/records-mgmt/bulletins>

STATUTES AND REGULATIONS

36 CFR Chapter XII, Subchapter B, specifies policies for Federal agencies' records management programs relating to proper records creation and maintenance, adequate documentation, and records disposition. The regulations in this Subchapter implement the provisions of 44 U.S.C. Chapters 21, 29, 31, and 33. NARA provides additional policy and guidance to agencies at its records management website - <http://www.archives.gov/records-mgmt/>.

At a high level, agency heads are responsible for ensuring several things, including:

- The adequate and proper documentation of agency activities (44 U.S.C. 3101);
- A program of management to ensure effective controls over the creation, maintenance, and use of records in the conduct of their current business (44 U.S.C. 3102(1)); and
- Compliance with NARA guidance and regulations, and compliance with other sections of the Federal Records Act that give NARA authority to promulgate guidance, regulations, and records disposition authority to Federal agencies (44 U.S.C. 3102(2) and (3)).

FOLLOW-UP ACTIONS

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

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

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

APPENDIX D
ACRONYMS AND ABBREVIATIONS

AF	Air Force
AFI	Air Force Instruction
AFMAN	Air Force Manual
AFRIMS	Air Force Records and Information Management System
AHS	Arlington Hall Station
ANG	Air National Guard
ANGMAN	Air National Guard Manual
ANGRC	Air National Guard Readiness Center
AR	Army Regulation
ARO	Agency Records Officer
ARIMS	Army Records and Information Management System
ARNG	Army National Guard
BRM	Base Records Manager
CFR	Code of Federal Regulations
CIO	Chief Information Officer
CMAT	Command Management Assistance Team
CNGB	Chief of the National Guard Bureau
CNGBI	Chief of the National Guard Bureau Instruction
COR	Chief Office of Record
CRM	Command Records Manager
DA	Department of the Army
DAF	Department of the Air Force
DOD	Department of Defense
DODI	Department of Defense Instruction
DODD	Department of Defense Directive
EIS	Electronic Information System
FARM	Functional Area Records Manager
FOIA	Freedom of Information Act
IG	Inspector General
iPERMS	Integrated Personnel Records Management System
JASMS	Joint Application Staff Management System
JFHQ	Joint Force Headquarters
JIEE	Joint Information Exchange Environment
MICT	Management Internal Control Toolset
NARA	National Archives and Records Administration
NGB	National Guard Bureau
NGBJS	National Guard Bureau Joint Staff
OIP	Office of Information and Privacy
OMB	Office of Management and Budget
OMPF	Official Military Personnel File
ORL	Office Records List
PAM	Pamphlet
PoCA	Plan of Corrective Action

RC	Records Custodian
RHA	Records Holding Area
RM	Records Management
RMSA	Records Management Self-Assessment
RMO	Records Management Officer
RO	Records Officer
SAO	Senior Agency Official
SAORM	Senior Agency Official for Records Management
SecAF	Secretary of the Air Force
SOP	Standard Operating Procedure
STD	Standard
UEI	Unit Effectiveness Inspections
U.S.C.	United States Code

APPENDIX E
INITIAL ACTIONS TO
ESTABLISH A RECORDS MANAGEMENT PROGRAM

The purpose of this appendix is to provide NGBJS RM Staff with a list of requirements to help establish the RM program directed by Recommendation 3. This list is not necessarily in chronological order as there are some efforts that will be needed to be done simultaneously. This list is also not all inclusive, but it should help with the initial efforts.

1. Strategic planning and goals for the RM program in accordance with OMB A-130.
2. The incorporation of records management into Information Technology (IT) strategic planning in accordance with OMB A-123 and OMB A-130.
3. Provisions for the continuous program support from senior leadership at the DOD SAORM level and the SAO level within the NGB in accordance with M-12-18, NARA Bulletin 2017-02, and CNGBI 5001.01.
4. Adequate assignment of staff and program resources according to roles and responsibilities as outlined in CNGBI 5001.01 or, at a minimum, those described in 36 CFR 1220.34(a)(c).
5. Development of a timeline to issue basic directives establishing program objectives, responsibilities, and authorities for the creation, maintenance, and disposition of agency records in accordance with 36 CFR 1220.34(c).
6. Provisions for the continuous assignment of program responsibilities at the directorate or office level in accordance with CNGBI 5001.01 or, at a minimum, those described in 36 CFR 1220.34(d).
7. The outline of a plan to develop adequate records management training for all NGBJS personnel as well as contractors and specific training for staff assigned to RM duties within NGBJS directorates and offices in accordance with 36 CFR 1220.34(f) and NARA Bulletin 2017.01.
8. The development of policies and procedures for IT systems creation and management to include RM in the design, development, implementation, migration, and decommissioning of information systems in accordance with 36 CFR 1220.34(e), 36 CFR 1236.6(b), 36 CFR 1236, and OMB Circular A-130.
9. A proposed timeline for the development of records schedules for all records, regardless of format, created and received by the agency. (36 CFR 1220.34(g))

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10. The development of controls, i.e., filing codes, inventories, manuals, etc., to ensure that all records, regardless of format or medium, are properly organized, classified or indexed, and described, and made available for use by all appropriate agency staff in accordance with 36 CFR 1220.34(i).
 11. A means for the designation of vital (essential) records throughout the NGBJS and the training of staff on their roles and responsibilities in the handling of these records in accordance with 36 CFR 1223.
 12. The development of policies and procedures to ensure that records management exit briefings are conducted and documented for all senior officials and employees separating from the NGBJS in accordance with 36 CFR 1222.24(a)(6).
 13. The establishment of formal records management evaluation mechanisms to measure the effectiveness of records management programs and practices at the NGBJS to ensure that they comply with Federal regulations. (36 CFR 1220.34(j))
 14. Agency-wide training and policies to inform email account holders of their responsibilities for managing email. Policies should be developed for all relevant stakeholders and address agency-wide as well as include local email procedures. (36 CFR 1236.22)

APPENDIX F COMPLETE LIST OF FINDINGS AND RECOMMENDATIONS

ORGANIZATIONAL STRUCTURE AND STRATEGIC DIRECTION

Finding 1: The NGB RM program lacks organizational clarity for the purposes of collaboration and coordination.

Recommendation 1.1: To develop, implement, and maintain an active and continuing records management program for the National Guard, as prescribed by DODD 5105.77 and CNGBI 5001.01, the CNGB must ensure that the Agency Records Officer designated to NARA is a permanent, full-time Federal employee. (36 CFR 1220.34(a))

Recommendation 1.2: The CNGB, as the senior official responsible for RM under CNGBI 5001.01, must clarify the agency records management directive or instruction to define the roles and responsibilities of the Agency RMO and the relationship of this position to ARNG and ANG Records Managers. (36 CFR 1220.34(c))

Recommendation 1.3: Under the direction of the CNGB, the NGB should create a working group of the ROs from the NGBJS, ARNG, and ANG to work on common RM program goals and objectives.

Finding 2: Senior leadership within the NGB and the DOD does not foster strategic coordination between the three NGB RM programs.

Recommendation 2.1: Senior leadership within the NGB should provide direction and support to the NGB RM program by filling the senior agency official position designated in CNGBI 5001.01.

Recommendation 2.2: The NGB should create a strategic plan for developing, implementing and maintaining a compliant RM program for the entire agency in accordance with 36 CFR Chapter XII Subchapter B, OMB Circular A-130, and CNGBI 5001.01.

Recommendation 2.3: Senior leadership within NGB must formalize routine engagement with the DOD SAORM for Independent Agencies. (OMB Circular A-130 and NARA Bulletin 2017-02)

Recommendation 2.4: NGB should consider requesting that DOD appoint a SAORM for the NGB.

NGBJS RM PROGRAM

Finding 3: Specific requirements are not in place for the NGBJS RM program to be compliant with Federal statutes and regulations or DOD directives and instructions.

Recommendation 3: The NGBJS must develop and implement a comprehensive plan to create, implement, and maintain a RM program in accordance with 36 CFR 1220 Subpart B and CNGBI 5001.01.

Finding 4: The NGBJS does not have a coordinated policy regarding FOIA requests and litigation holds.

Recommendation 4: In coordination with ARNG and ANG, NGBJS should establish written policies and procedures for FOIA requests and litigation holds.

Finding 5: The NGBJS RM program does not ensure that records management is included in the development of electronic information systems (EIS).

Recommendation 5: NGBJS RM staff must be formally included in the design, development, implementation, migration, and decommissioning of EIS. (DOD 5015.02 STD, 36 CFR 1220.34(e), 36 CFR 1236.6(b), 36 CFR 1236.10, and OMB Circular A-130)

ARNG RM PROGRAM

Finding 6: The ARNG RO does not have the resources to provide oversight for the program in accordance with the ARNG RM SOP of October 11, 2013, AR 25-1, and AR 25-400-2.

Recommendation 6: The ARNG must review current staffing and oversight of the RM program to ensure that it meets the requirements of the ARNG RM SOP or develop procedures to provide effective program controls to meet the requirements of 44 U.S.C. 3102.

Finding 7: The ARNG has not adequately staffed the RM program at the installation or unit level in accordance with AR 25-1 and 36 CFR 1220.34(d).

Recommendation 7: The ARNG must develop procedures that institute the roles and responsibilities for Records Managers and Records Custodians, as outlined in AR 25-1, throughout the organization to staff its program effectively. (36 CFR 1220.34(d))

Finding 8: The ARNG does not have effective control of Federal records in its custody.

Recommendation 8: ARNG RM must develop a plan to conduct a complete inventory of ARNG records in both paper and electronic format in order to meet the requirements of AR 25-400-2 and 36 CFR 1220.34(i).

Finding 9: The ARNG retains paper copies of permanent Official Military Personnel Files (OMPFs) beyond their scheduled cutoff and transfer dates.

Recommendation 9.1: ARNG must conduct an inventory of OMPFs in all formats at ARNG facilities. (36 CFR 1220.34(i))

Recommendation 9.2: ARNG RO must develop and implement a plan to transfer OMPFs to a designated Federal or State archival institution according to approved records schedules. (36 CFR 1226.22)

Finding 10: The ARNG is not providing proper oversight of RHAs and is not storing records in accordance with AR 25-1 and 36 CFR 1234.

Recommendation 10.1: The ARNG must inspect RHAs at all ARNG installations to determine the safety of these structures as well as the adequacy or need for these facilities to store permanent or long-term temporary records. (AR 25-1 and 36 CFR 1234)

Recommendation 10.2: The ARNG must create and implement procedures to ensure the proper storage of records at installations without a RHA, including instructions for the destruction of records according to approved records schedules or transfer to an approved storage area for long-term storage in accordance with AR 25-1, DA PAM-403, and 36 CFR 1234.

Finding 11: Current evaluation procedures are not focused on records management and do not provide a detailed RM program overview to senior leadership at the ARNG.

Recommendation 11.1: ARNG should update evaluation procedures to focus on records management and provide a detailed overview of evaluations to senior leadership at the ARNG. (36 CFR 1220.34(j))

Recommendation 11.2: ARNG procedures should include monitored plans of corrective action.

Finding 12: Other requirements are not in place for the ARNG RM program to be compliant with Federal statutes and regulations.

Recommendation 12: Army records management policies and directives for recordkeeping, training, vital (essential) records, exit briefings, and EIS must be implemented by ARNG RM. (36 CFR 1220.34(c))

ANG RM PROGRAM

Finding 13: ANG RM is not currently managing shared drives and the storage of electronic records in accordance with 36 CFR 1236.10, AFMAN 33-363 and ANGMAN 33-363.

Recommendation 13.1: The ANG CRM must create and implement policies and procedures that ensure the maintenance of records stored on shared drives in accordance with AFMAN 33-363 and 36 CFR 1236.10.

Recommendation 13.2: The ANG CRM must create and implement policies and procedures for auditing the use of shared drives in ANG units and directorates. (36 CFR 1236.10)

Recommendation 13.3: The ANG CRM should study long-term electronic records storage requirements for the ANG and make recommendations regarding adequate storage methods for electronic records.

Finding 14: The ANG CRM does not have an active role in the oversight and evaluation of the ANG RM program.

Recommendation 14.1: The ANG should require and fund RM inspections or evaluations by the CRM. (36 CFR 1220.34(j))

Recommendation 14.2: The ANG should grant the CRM full access to MICT and Capstone reports for program assessment and review purposes, and for implementing RM program improvements across the ANG.

Recommendation 14.3: The ANG should establish a procedure that includes records management status reports from the BRMs to the CRM.

Recommendation 14.4: The CRM should establish a procedure that includes periodic summary written reports on the status of the ANG RM program for agency senior leaders based on inspection or evaluation reports and BRM reports.



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