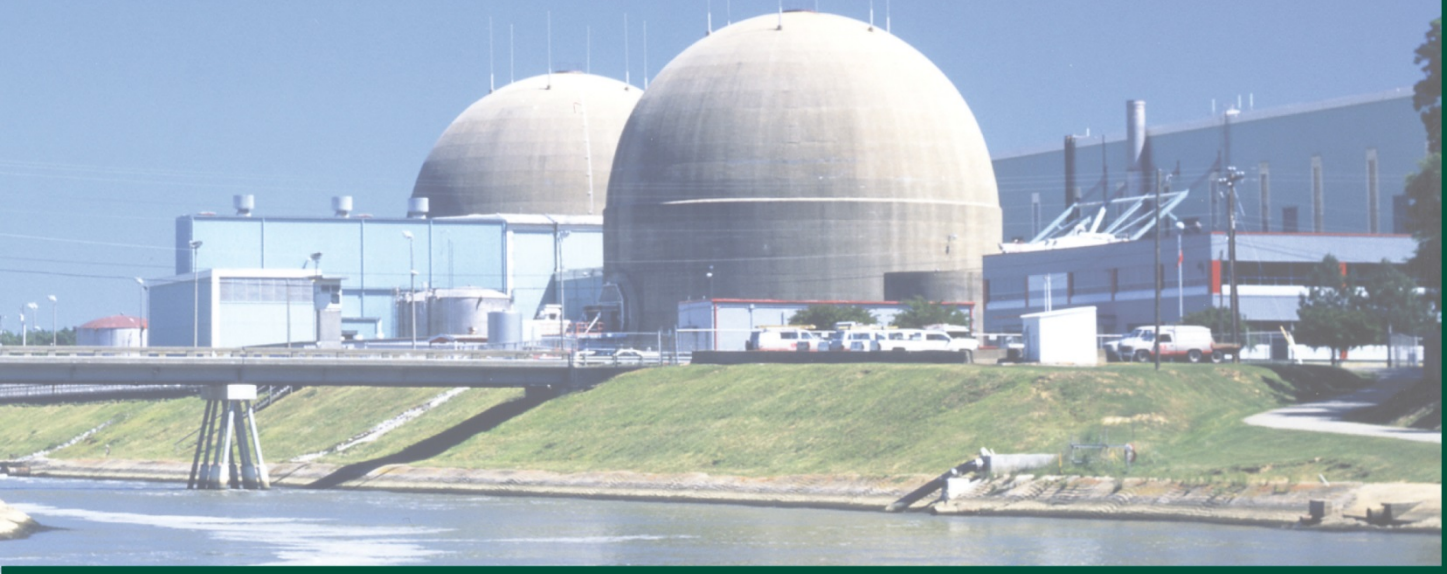
OFFICE OF THE INSPECTOR GENERAL

U.S. NUCLEAR REGULATORY COMMISSION
DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Audit of NRC's Process for Placing Official Agency Records in ADAMS

OIG-19-A-20
September 26, 2019



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

OFFICE OF THE
INSPECTOR GENERAL

September 26, 2019

MEMORANDUM TO: Margaret M. Doane
Executive Director for Operations

FROM: Dr. Brett M. Baker /RA/
Assistant Inspector General for Audits

SUBJECT: AUDIT OF NRC'S PROCESS FOR PLACING OFFICIAL AGENCY RECORDS IN ADAMS (OIG-19-A-20)

Attached is the Office of the Inspector General's (OIG) audit report titled *Audit of NRC's Process for Placing Official Agency Records in ADAMS*.

The report presents the results of the subject audit. Following the September 18, 2019, exit conference, agency staff indicated that they had no formal comments for inclusion in this report.

Please provide information on actions taken or planned on each of the recommendations within 30 days of the date of this memorandum. Actions taken or planned are subject to OIG followup as stated in Management Directive 6.1.

We appreciate the cooperation extended to us by members of your staff during the audit. If you have any questions or comments about our report, please contact me at (301) 415-5915 or Vicki Foster, Team Leader, at (301) 415-5909.

Attachment: As stated

Office of the Inspector General

U.S. Nuclear Regulatory Commission
Defense Nuclear Facilities Safety Board

OIG-19-A-20
September 26, 2019

Results in Brief

Why We Did This Review

The U.S. Nuclear Regulatory Commission's (NRC) mission is to license and regulate the Nation's civilian use of radioactive materials to provide reasonable assurance of adequate protection of public health and safety and to promote the common defense and security and to protect the environment. Records management enables and supports NRC's work to fulfill its mission. Since April 2000, NRC has relied on an electronic recordkeeping system called the Agencywide Documents Access and Management System (ADAMS) to mange agency records.

Federal agencies are required to establish a records management program to ensure compliance with the regulations governing records management issued by the National Archives and Records Administration (NARA). The NRC Office of the Chief Information Officer (OCIO) manages NRC's records management program and ensures that NRC efficiently complies with all applicable records management regulations and NARA policy.

The audit objective was to determine whether NRC's process ensures official agency records are properly identified and profiled within ADAMS.

Audit of NRC's Process for Placing Official Agency Records in ADAMS

What We Found

NRC has processes in place to identify and profile official agency records in ADAMS; however, personal papers are stored in ADAMS and the email management tool is inconsistently used. Opportunities exist for improvements to NRC's (1) records management training (2) review and monitoring of ADAMS' records, and (3) proper capture of email records.

NARA and NRC guidance require that personal papers must be maintained separate from official agency records (OARs) and are not to be stored in ADAMS. However, NRC staff placed personal papers in ADAMS and, in some cases, incorrectly profiled them as OARs. This occurs because NRC records management training is inadequate and ADAMS does not have controls to prevent storage of personal papers. As a result, ADAMS' effectiveness as an official records repository could be diminished and information in personal papers could be released.

NARA and NRC guidance require that all email records must be managed in an electronic format and NRC Capstone officials must identify emails that should be captured and retained as Federal records. However, the Capstone tool is inconsistently used because there are no controls to ensure Capstone officials use the tool. In addition, the Capstone tool is time consuming for Capstone officials to use. As a result, NRC runs the risk of non-compliance with Federal requirements and the loss of valuable email records of importance to NRC's mission.

What We Recommend

This report makes five recommendations to improve the effectiveness of placing OARs in ADAMS by improving training and strengthening internal controls. Agency management stated their general agreement with the findings and recommendations in this report.

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ABBREVIATIONS AND ACRONYMS

ADAMS	Agencywide Documents Access and Management System
NARA	National Archives and Records Administration
NRC	Nuclear Regulatory Commission
OAR	Official Agency Record
OCIO	Office of the Chief Information Officer

I. BACKGROUND

The Nuclear Regulatory Commission's (NRC) mission is to license and regulate the Nation's civilian use of radioactive materials to provide reasonable assurance of adequate protection of public health and safety and to promote the common defense and security and to protect the environment. Records management enables and supports NRC's work to fulfill its mission. Since April 2000, NRC has relied on an electronic recordkeeping system called the Agencywide Documents Access and Management System (ADAMS) to organize, process, and manage agency records. NRC records contain information that is critical to the agency's mission; therefore, it is essential to manage records to provide evidence of NRC actions, inform future efforts, and communicate to the public.

The Federal Records Act of 1950

Managing records is a multifaceted activity required by the Federal Records Act of 1950, as stipulated in *36 Code of Federal Regulations* (CFR), Chapter 12, Subpart B, and 44 U.S.C. 3101. The Federal Records Act of 1950, defines records management as

> The planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, maintenance and use, and disposition to achieve adequate and proper documentation of the policies and transactions of the Federal government.

Federal agencies are required to establish a records management program to ensure compliance with the regulations governing records management issued by the National Archives and Records Administration (NARA). NARA is the Nation's recordkeeper and oversees records management practices in all Federal agencies. NARA monitors compliance with records management regulations through inspections, program reviews, surveys, and assessments.

NARA also approves the disposition schedules for Federal agencies' permanent and temporary records and provides offsite storage services

for permanent and temporary records. Permanent records are any Federal records that have been determined by NARA to have sufficient value to warrant their preservation in the National Archives of the United States. Permanent records disposition means that the records are permanently transferred, or accessioned, to NARA. In contrast, temporary records, are stored for the timeframe required by the NARA approved disposition schedule. Temporary records require destruction or deletion depending on the security requirements of the records.

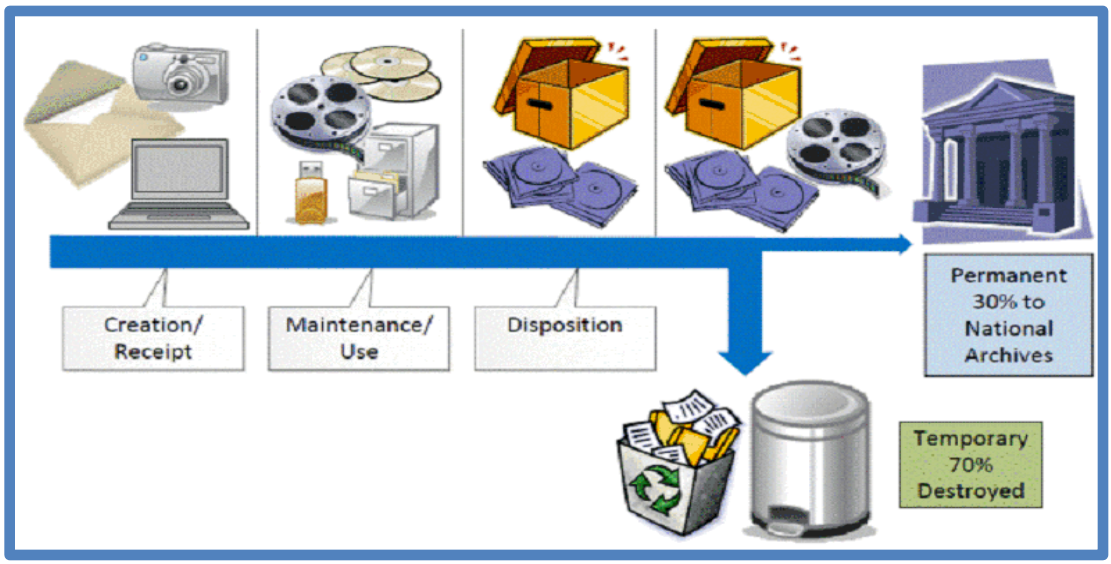
NRC Records Management Program

NRC has established a records management program to comply with applicable Federal regulations. The Office of the Chief Information Officer (OCIO) manages NRC's records management program, assigns responsibility for developing and implementing the program, and ensures that NRC efficiently complies with all applicable records management regulations and NARA policy. Additionally, OCIO is NRC's liaison with NARA and provides guidance to assist NRC employees in identifying official records. All NRC office directors and regional administrators implement records management procedures and programs within their areas of responsibility. Points-of-contact within each program office liaison with OCIO and facilitate NRC's records management procedures within their respective offices/regions.

NRC Management Directive 3.53,[1] *NRC Records and Document Management Program*, requires that employees and contractors follow NRC records management program procedures throughout the NRC records lifecycle. The NRC records management lifecycle is the cradle-to-grave process that begins with record creation, continues through records maintenance and use, and ends with records disposition. Figure 1 illustrates NRC records lifecycle.

[1] This directive was last updated on March 15, 2007.

Figure 1: NRC Records Lifecycle



Source: NRC

Federal Record Types

Records are any documentary material (in any form) made or received by the Government that provides evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or has informational value contained in the material. Federal records include a variety of formats, including videos, emails, photos, and maps.

Official Agency Records

NRC official agency records (OARs) are any product related to the NRC mission, administrative, enforcement, or regulatory policies and activities. OARs may include final products or supporting materials and draft documents.

Non-Record Materials

Non-record materials (non-OARs) are those Federally-owned informational materials that do not meet the statutory definition of records or that have been excluded from coverage by the definition. Non-OARs may include extra copies of documents kept only for reference, publications and processed documents, and library museum materials intended solely for reference or exhibit.

Personal papers are one type of non-OARs of a private or nonofficial character that ordinarily pertain only to an individual's personal affairs and do not affect the conduct of agency business. Examples are family papers and personal correspondence relating to private business, professional, or community service activities.

NRC's Process for Identifying and Profiling Records

Per NRC's guidance, all NRC staff and contractors are required to identify and profile OARs and non-OARs. The process for identifying records begins when staff create or receive documentary materials, including emails. If any of the following four conditions apply — purpose, adequacy of the documentation, preservation issues, or value — the documentary materials are initially entered into ADAMS pending declaration as a record. To help staff decide whether records are OARs or some other type of documentary material, staff use a simple question and answer process to be guided to the most likely classification for the record. For more details on the process of identifying records, see Appendix B.

Records profiling is the input and submission of records into ADAMS. Profiling is a two-part process that is the joint responsibility of both NRC staff and OCIO. NRC staff and contractors are responsible for initial ADAMS input of electronic files and submission of paper documents that are created or received. With each record submitted to OCIO, staff and contractors also include NRC Form 665, *ADAMS Document Submission*, which identifies information such as public availability and sensitivity. Subsequently, OCIO completes the record's profile process which includes a quality assurance check, scanning, OAR declaration, and publishing records to ADAMS. As of February 2019, ADAMS contained 2,458,994 OARs.

Emails are also Federal records that must be managed for their entire records lifecycle. In December 2016, NRC implemented the Capstone approach with a tool and training for staff to manage emails records. Capstone was developed and approved by NARA as part of NARA's continuing efforts to evaluate how agencies have used various email repositories to manage email records. When adopting the Capstone approach, NRC identifies those email accounts most likely to contain records that should be entered into ADAMS as OARs and preserved as permanent records.

II. OBJECTIVE

The audit objective was to determine whether NRC's process ensures official agency records are properly identified and correctly profiled within ADAMS. Appendix A contains information on the audit scope and methodology.

III. FINDINGS

NRC has processes in place to identify and profile official agency records in ADAMS; however, personal papers are stored in ADAMS and the email management tool is inconsistently used. Opportunities exist for improvements to NRC's (1) records management training (2) review and monitoring of ADAMS' records, and (3) proper capture of email records.

A. Unallowable Personal Papers Are Stored in ADAMS

NARA and NRC guidance require that personal papers must be maintained separate from OARs and are not to be stored in ADAMS. However, NRC staff placed personal papers in ADAMS and, in some cases, incorrectly profiled them as OARs. This occurs because NRC records management training is inadequate and ADAMS does not have controls to prevent storage of personal papers. As a result, ADAMS' effectiveness as an official records repository could be diminished and information in personal papers could be released.

What Is Required

Personal Papers Must Not Be Stored With OARs

The Federal Records Act of 1950 requires personal papers to be clearly designated as such and to be maintained separately from OARs.

NRC Management Directive 3.53 states that Federal records and non-record materials are to be maintained separately and clearly distinguishable from personal papers. In addition, the *ADAMS Navigator User Guide*, states ADAMS may not be used to store personal papers.

What We Found

NRC Staff Placed Personal Papers in ADAMS

Despite Federal and NRC requirements, NRC staff placed personal papers in ADAMS and, in some cases, incorrectly profiled them as OARs. OIG conducted a search in ADAMS for general words used to characterize personal papers (e.g., picnics, pictures, sports) to determine if the resulting records were placed in ADAMS. The results included many examples of personal papers, such as personal pictures; personal emails relating to personal and private affairs; community service activities; an event invitation; a petition; and inappropriate materials. Some of these personal papers are publicly available and are incorrectly profiled as OARs.

Why This Occurred

Records Management Training Is Inadequate and ADAMS Does Not Have Controls To Prevent Personal Paper Storage

NRC staff placed personal papers in ADAMS and incorrectly profiled personal papers as OARs because NRC's records management training is inadequate and ADAMS does not have controls to prevent the storage of personal papers.

Inadequate Records Management Training

NRC's records management training, *NRC Records Management Training (ID_151144)*, does not cover key requirements of NARA. OIG analyzed NARA's Bulletin 2017-01, *Agency Records Management Training Requirements*, and identified 22 training requirements applicable to NRC. Of the 22 minimum requirements, NRC did not fully address 4 (18

percent). For example, NRC requires triennial refresher training[2] while NARA requires annual refresher training. OIG acknowledges that NRC's management directives and handbooks related to managing records supplement NARA's requirements; however, they are not stated in the required training. See Appendix C for the complete list of the NARA records management training requirements and OIG's analysis of NRC's compliance with these requirements.

ADAMS Does Not Have Controls To Prevent Personal Paper Additions

ADAMS does not have controls to prevent staff from storing personal papers in ADAMS. Currently, any employee or contractor[3] with an NRC email address or network access can add documents to ADAMS. The only review for documents added to ADAMS is conducted by OCIO contractors to ensure the quality and accuracy of document profiles and to declare documents as OARs. OCIO contractors do not review document content and make a determination on whether a document should be stored in ADAMS. Once a document is in ADAMS, OCIO does not review or audit documents for appropriateness. Therefore, a personal paper that is added as a draft document will likely never be reviewed by OCIO and will remain in ADAMS unless the owner deletes it.

Why This Is Important

ADAMS' Effectiveness Could Be Diminished and Personal Information Could be Released

Without stronger controls to keep personal papers out of ADAMS, ADAMS' effectiveness as an official records repository could be diminished and information in personal papers could be released. By filing personal papers as OARs, NRC increases the chance that personal papers will be confused with OARs and be made available to the public under the Freedom of Information Act.

[2] The refresher training course is the same course as the original training.
[3] Contractors must sign a non-disclosure statement before granting access to ADAMS.

Recommendations

OIG recommends that the Executive Director for Operations

1. Require NRC's refresher records management training be completed annually by all staff and contractors with email accounts or network access.

2. Assess and update NRC's records management training to address NARA requirements.

3. Conduct an initial review of ADAMS to identify and remove personal papers, and implement a policy to conduct such reviews on a periodic basis.

4. Strengthen internal controls to prevent individuals from entering personal papers in ADAMS.

B. Capstone Tool is Inconsistently Used to Capture Emails As Federal Records

NARA and NRC guidance require that all email records must be managed in an electronic format and NRC Capstone officials must identify emails that should be captured and retained as Federal records. However, the Capstone tool is inconsistently used because there are no controls to ensure Capstone officials use the tool. In addition, the Capstone tool is time consuming for Capstone officials to use. As a result, NRC runs the risk of non-compliance with Federal requirements and the loss of valuable email records of importance to NRC's mission.

What Is Required

NRC Capstone Officials Must Capture And Retain Emails As Federal Records

According to the Office of Management and Budget Memorandum for the Heads of Executive Departments and Agencies and Independent Agencies, M-14-16 *Guidance on Managing Email*, September 14, 2014,

Federal agencies must manage all email records in an electronically accessible format. Agencies must have policies in place to identify emails that are Federal records. These policies must ensure that emails identified as Federal records are filed in agency recordkeeping systems. NRC guidance for capturing email records, *NRC Capstone Email Capture User Guide*, states that NRC Capstone officials must identify emails that should be captured and retained as Federal records; personal and non-Federal emails should not be captured and stored in ADAMS.

Who are Capstone Officials?

Capstone officials are the designated individuals in high-level policy-making positions that are likely to create or receive permanently valuable Federal records.

NRC's Capstone officials are the Chairman, Commissioners, Executive Director of Operations, Deputy Executive Directors of Operations, Secretary of the Commission, Office Directors, and Regional Administrators.

What We Found

Capstone Tool Is Inconsistently Used

Capstone is the NRC's email management tool that provides the designated Capstone officials with an approach to identify and capture emails that are Federal records; however, not all NRC Capstone officials use the Capstone e-mail management tool. Of seven Capstone officials interviewed, five officials indicated that they do not use the Capstone email management tool. Some Capstone officials favor keeping all emails in their inbox or sent file, or rely on staff to manage their emails. Other Capstone officials conveyed that they never got accustomed to using the tool.

Furthermore, OIG analysis of the number of emails added into ADAMS using Capstone indicates inconsistent use of the tool to identify and capture emails as Federal records. From September through December 2018, of 20 program offices, 10 captured no email records; 5 captured email records (1 - 12), and 5 captured email records (13 plus). Table 1 illustrates the number of email records captured by the program offices.

Table 1: Capstone Emails Identified and Retained September 2018 to December 2018

Program Office	September 2018 Emails Captured by Capstone Officials	October 2018 Emails Captured by Capstone Officials	November 2018 Emails Captured by Capstone Officials	December 2018 Emails Captured by Capstone Officials	Totals
ADM	41	89	62	77	269
EDO	-	-	184	-	184
NRO	80	11	3	57	151
NRR	-	1	-	-	1
NSIR	-	1	1	-	2
NMSS	10	-	2	-	12
OCA	-	-	-	-	-
OCHCO	-	-	-	-	-
OCFO	-	-	-	-	-
OCIO	-	44	-	-	44
OCM	-	-	-	-	-
OE	-	-	-	-	-
OGC	-	81	35	31	147
OIP	-	-	-	-	-
RES	-	-	-	-	-
RI	-	-	-	-	-
RII	2	1	-	7	10
RIII	-	-	-	-	-
RIV	-	-	-	-	-
SBCR	2	-	1	-	3
Totals	135	228	288	172	823

Source: OIG analysis

Why This Occurred

Capstone Controls Allow for Optional Email Selections and is Time Consuming To Use

The Capstone tool in place to capture email records is inconsistently used because there are no controls to ensure Capstone officials use the tool. In addition, the Capstone tool is time consuming to use. Capstone controls allow Capstone officials the option to capture emails. Currently, NRC implements an *Opt-in* approach under which Capstone officials identify and select those records that are OARs and permanently transferred to NARA. Under this approach, Capstone officials manage their own email accounts and apply their own understanding of Federal records. This means that Capstone officials are required to review each message,

identify its value, and either delete it or move it to ADAMS. NRC officials stated placing the responsibility on Capstone officials to make decisions on an email-by-email basis can create a burden and is time consuming.

OIG interviewed seven Capstone officials who expressed the lack of time to use the tool. Two officials who use the tool explained that the tool is not available on mobile devices, where they frequently check emails. Others expressed difficulty with determining what is an OAR. Of seven officials, five are in favor of implementing the *Opt-out* approach.[4] However, under the Opt-out approach, OIG concludes that the probability of capturing non-OARs and personal paper emails may increase.

Why This Is Important

NRC at Risk of Noncompliance with Federal Recordkeeping Requirements and Could Lose Valuable Information

Without consistent use of Capstone tool to identify and capture emails that are Federal records, NRC risks non-compliance with NARA guidelines and may lose vital email records such as, administrative and program planning needs, evidence of NRC activities, legal and financial information, and documentation of the Agency's history. Importantly, email records serve as the agency's memory and help the organization continue to function effectively and efficiently.

Recommendations

OIG recommends that the Executive Director for Operations

5. Strengthen internal controls to ensure use of the Capstone tool and compliance with NARA requirements.

[4] The *Opt-out* approach means that all email communications of Capstone officials are automatically captured unless identified for exclusion by the Capstone official.

IV. CONSOLIDATED LIST OF RECOMMENDATIONS

OIG recommends that the Executive Director for Operations

1. Require NRC's refresher records management training be completed annually by all staff and contractors with email accounts or network access.

2. Assess and update NRC's records management training to address NARA requirements.

3. Conduct an initial review of ADAMS to identify and remove personal papers, and implement a policy to conduct such reviews on a periodic basis.

4. Strengthen internal controls to prevent individuals from entering personal papers in ADAMS.

5. Strengthen internal controls to ensure use of the Capstone tool and compliance with NARA requirements.

V. AGENCY COMMENTS

An exit conference was held with the agency on September 18, 2019. Prior to this meeting, agency management reviewed a discussion draft. Agency management stated their general agreement with the findings and recommendations in this report and opted not to provide formal comments for inclusion in this report.

Appendix A

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The audit objective was to determine whether NRC's process ensures official agency records are properly identified and correctly profiled within ADAMS.

Scope

This audit focused on NRC's processes for identifying and profiling official agency records. We conducted this audit at NRC headquarters (Rockville, MD) from January 2019 to July 2019. Internal controls related to the audit objective were reviewed and analyzed.

Methodology

Throughout this audit, OIG reviewed relevant criteria and guidance. OIG's document review included:

- *36 Code of Federal Regulations*, Chapter 12, Subpart B, and 44 U.S.C. 3101, *Records Management*
- Management Directive 3.53, *NRC Records and Document Management Program*
- NUREG-0910, Revision 4, *NRC Comprehensive Records Disposition Schedule*
- *ADAMS Navigator User Guide*
- *NRC Capstone Email Capture User Guide*

OIG interviewed OCIO staff that perform records management duties and various staff and managers from program offices. The program office interviews included Capstone officials, Administrative Assistants, and program office liaisons to OCIO that are currently referred to as points-of-contact.

During the audit, OIG reviewed documents in ADAMS to determine whether official agency records were properly identified and profiled in ADAMS. OIG analyzed NRC's records management training course content and reviewed data of NRC employees that completed the course. OIG also analyzed the number of email records identified and added into ADAMS using the Capstone tool from September through December 2018. Our tests of compliance with laws and regulations included an analysis of NRC's policy and practices for the use of the Capstone tool in accordance with NARA requirements.

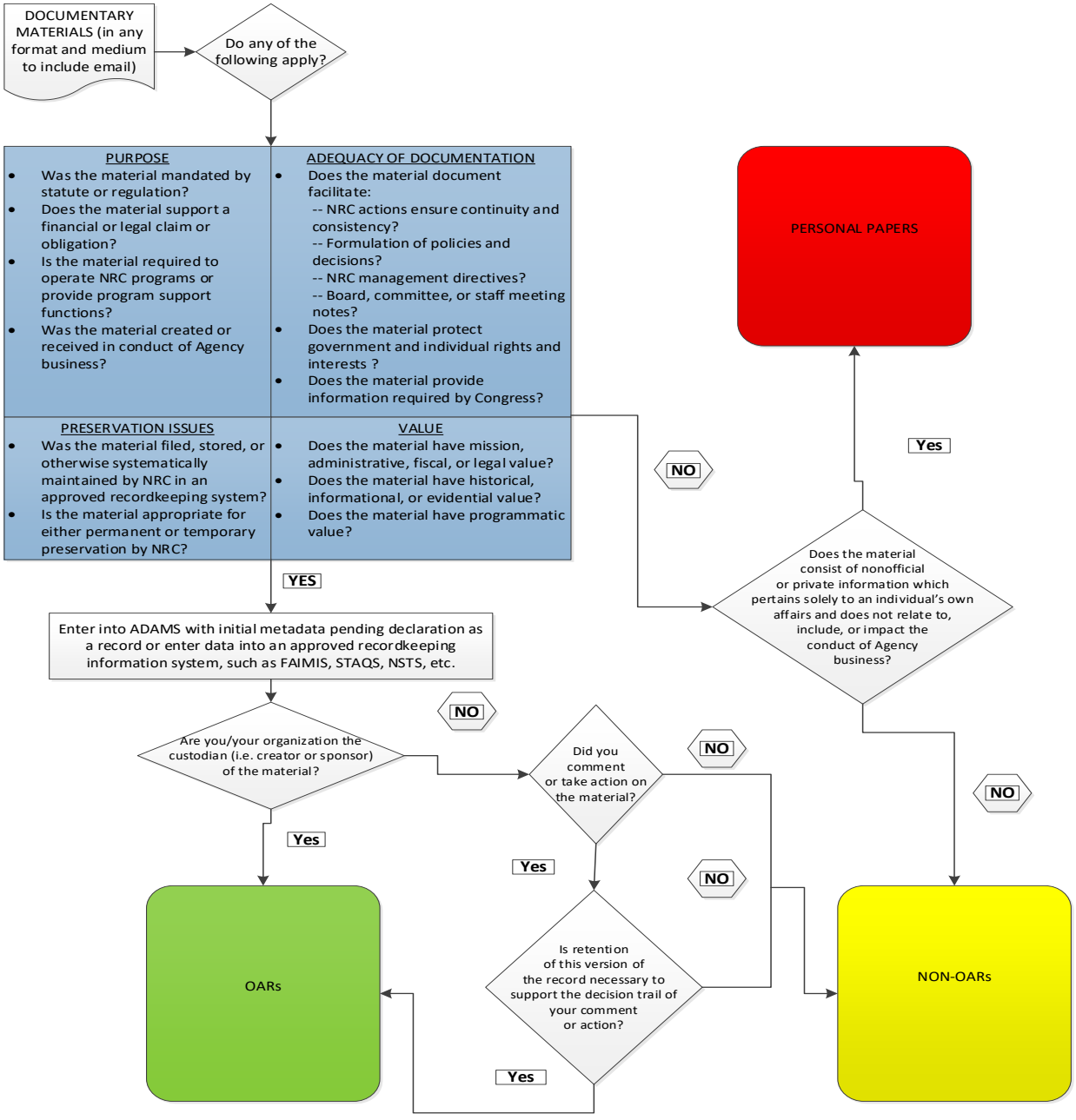
We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Throughout the audit, auditors considered the possibility of fraud, waste, and abuse in the program.

The audit was conducted by Vicki Foster, Team Leader; Ziad Buhaissi, Audit Manager; Regina Revinzon, Senior Auditor; George Gusack, Senior Auditor; John Thorp, Senior Technical Advisor; and Tamara Bellinger, Student Intern.

Appendix B

PROCESS FOR IDENTIFYING A RECORD



Source: NRC

Appendix C

OIG ANALYSIS OF NRC RECORDS MANAGEMENT TRAINING

NARA Training Requirements	Extent Addressed		
	Not	Partially	Fully
1. All agency personnel with email accounts or IT network resource access must complete records management training within 60 days of employment.			●
2. All agency personnel with email accounts or IT network resource access must complete annual refresher training.	X		
3. Agencies must provide records management training to all agency personnel that create, receive, access, or use Federal records on behalf of the agency, regardless of whether those individuals have email accounts or IT network access.			●
4. Agencies must develop records management training content specific to the practices and policies of the organization.			●
5. Define Federal records.			●
6. Describe how records management supports the agency's mission and business processes, and public access to government information.			●
7. Provide an overview of government-wide and agency-specific records management policies and recordkeeping requirements.			●
8. Explain legal responsibilities for creation, maintenance, and disposition of Federal records.			●
9. Describe the stages of the records management lifecycle, to include the creation, maintenance and use, disposition, and the difference between temporary and permanent records, all of which are addressed in the agency's disposition schedule.			●
10. Describe how to distinguish records from nonrecord materials and personal materials.			●
11. Describe what is a records schedule, its legal authority, and where to find their agency's schedules.			●
12. Describe why it is important to follow records schedules or file plans.			●
13. How records schedules or files plans are implemented and updated.	X		
14. Explain how legal holds (sometimes called records freezes) and the discovery phase of litigation affect records handling, retention, and disposition.	X		
15. Describe how and where to store agency Federal records.		◐	
16. Describe how agency information technology (IT) systems are used for records management (if applicable, how to use agency records management technologies).	X		
17. Describe how to manage record and nonrecord materials in email, social media, and other electronic messages, including the statutory requirement that all emails and other electronic messages constituting a record that are sent or received using a personal or non-official account must be copied or forwarded into agency recordkeeping systems within 20 days of creation or receipt.		◐	
18. Describe what to do with record and nonrecord materials when an employee leaves the agency.		◐	
19. Describe what to do when records are removed, lost, or destroyed without proper authorization.			●
20. Describe where to get more information about records management (e.g., websites, manuals, agency's records schedule, file plans, and agency Records Officer contact information).			●
21. Provide agency contacts for records management questions. Include information for the field and/or headquarters points of contact for retiring records to storage, transferring permanent records, destruction of records, and answering records management questions.			●

22. Provide targeted records management training to political appointees, senior agency officials, and senior executives upon their arrival and departure, and within three to six months prior to a presidential administration change. This may include conducting entry and exit interviews with your agency's records management staff, IT liaisons, and general counsel to ensure that records are preserved and protected.	

Source: OIG analysis

TO REPORT FRAUD, WASTE, OR ABUSE

Please Contact:

Email: Online Form

Telephone: 1-800-233-3497

TTY/TDD: 7-1-1, or 1-800-201-7165

Address: U.S. Nuclear Regulatory Commission
Office of the Inspector General
Hotline Program
Mail Stop O5-E13
11555 Rockville Pike
Rockville, MD 20852

COMMENTS AND SUGGESTIONS

If you wish to provide comments on this report, please email OIG using this link.

In addition, if you have suggestions for future OIG audits, please provide them using this link.