

FCW Perspectives

The long road to electronic records management

A deadline looms for switching to all-digital records, but the pandemic and other developments are presenting new challenges

Office of Management and Budget Memo M-19-21 requires all federal agencies to move to fully electronic records management by the end of 2022. Issued in June 2019, M-19-21 also instructs the National Archives and Records Administration to stop accepting paper records after Dec. 31 of next year — giving agencies added incentive to hit the deadline.

As agencies approach the midway point of this march toward truly digital records, FCW gathered a group of records management executives and other stakeholders to see how their efforts are progressing. The discussion was on the record but not for individual attribution (see Page 42 for the list of participants), and the quotes have been edited for length and clarity. Here's what the group had to say.

Progress made and problems outstanding

Every participant said her or his agency was making headway in converting to electronic records management (ERM), though just how much varied widely. COVID-19 and the workforce dispersal it prompted have affected M-19-21 efforts, they said, but traditional government challenges were having a much bigger impact.

“The biggest part of it is that there’s not really a dedicated budget to doing any of the records management pieces in the department,” one official said. “So we have to piggyback off of the programs.”

Fiscal 2022 will be the first year the budget implications are made clear to mission owners, another participant said, adding: “I suspect that’s going to play into the risk balancing act that we have to do. The worst-case scenario is that we preserve the things and try to deal with it next time.”

At one agency, a reorganization moved the records management team and forced a repeat of time-consuming discussions to get leadership on board. “We’ve become sort of the red-headed stepchild for compliance,” the affected official said. “Every time we move our office around it, it’s like we lose a year or two in progress.”

Several participants said the push for better metadata is the top priority in 2021. M-19-21 instructed agencies to have their records in electronic form “to the fullest extent possible” by the end of 2019, while the 2022 deadline is for managing “all permanent records in an electronic format and with appropriate metadata.”

“I’ve spent a lot of time in the last couple of months going through our holdings to sort out what needs to be digitized and where we need more metadata,” one official said. “That’s about the various fields of mission-specific meta tags as well as all the attributes that NARA is looking for.”

A particular challenge for another official is bringing records management to systems built around datasets rather than documents. “What used to be collected in forms is now being put into databases and reconfigured for reporting, trending and approval and all that,” the official said. “We need to think even further upstream of not just what data is being captured in these systems, but who is designing these systems to solve problems. And that pushes records management into that information governance of asking: Why are we designing this?”

That brings ERM into the realm usually managed by CIOs, CTOs and now

chief data officers, the official added. “So we’re in the middle of working with them through their IT processes. But I’m comfortable with where we are.”

“Comfortable” with the progress to date was the general consensus of the group, though no one predicted 100% compliance by the M-19-21 deadline. “We are not going to be totally electronic by the end of 2022,” one participant said, “but we will be well on our way.”

Making the most of existing building blocks

Most agencies were trying to purge paper from their operations long before M-19-21 mandated it, so important tools are already in place in many cases. In particular, the government’s widespread adoption of Microsoft Office 365 — and rapid rollout of Teams when COVID-19 hit — has opened up new opportunities to weave ERM into day-to-day operations more seamlessly. But participants pointed to complications that must be addressed.

Office 365 offers “a significant amount of flexibility in terms of adjusting to the various sizes and missions of the department,” one official said, but “there is no one-size-fits-all records management application that would satisfy all those needs.”

Another pointed out that an agency’s ERM capacity with a given tool depends on its specific licensing agreement, and many of the technologies developed for private-sector IT environments “had to be brought up to snuff to be deployed.”

In addition, the rush to enable more



virtual collaboration has added new obstacles to ERM. “We had a nice roll-out planned for Teams, and records management was being built into that whole process,” one official said. “All of a sudden, that got thrown out the window as Teams was just immediately pushed out to everybody when they went home in March.”

Another official echoed those comments, saying: “Our Teams rollout was rapid and not well-planned. It sort of filled the gap, but it was stated at the outset that this is not a platform of record, and everybody in the agency who uses this platform has to drag anything of value that they want to maintain as a record into their own system.”

The first official predicted that fast rollouts will be the norm. “Records management is going to be in there as part of that rollout, but we’re going to have to find the gaps and fill them in as we’re going along down the path of deploying these things.”

Compliance as a byproduct

The group warned that a big risk of playing catch-up rather than integrating from the outset is having ERM feel

like a poorly designed imposition on day-to-day users. Too often, one official said, IT shops “seem not to care about the user experience.”

Records management leaders must fill that gap, another agreed, saying: “IT is really good at providing the tools and the technologies to our staff, but they’re not really good at telling them how to use it. So we have set ourselves up as the help desk in the organization — not related to any technologies we can’t solve but related to our interest that meshes with our colleagues’ interest, which is, ‘Can you find your information?’”

Additionally, several participants said framing the effort around ERM compliance was a fast track to trench warfare with an agency’s middle management. Compliance “doesn’t get a lot of space on senior leaders’ plates in our agency,” one official said. “You’ll be dealing only with lower-level people.”

“We’re trying to get leadership to see that their problem will be solved by an information and data management solution,” another said. “And oh, by the way, we’ll get compliance as a byproduct.”

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That's not to say that the deadlines and requirements of M-19-21 aren't being used as leverage. "I'm using that date to flog our leadership and saying that we have to be compliant with OMB, and that gets their attention," one participant noted. "We get a lot of rolled eyes and a lot of patient faces, but we also know that it's the only way to change a culture that is not willing, that prints out everything and thinks their copies of paper are things that are records."

Nevertheless, another said, "it's important to recognize that compliance is reactive and that we often get lost in projects and efforts to comply and lose sight of the larger mission, which is most critical. You don't get any records if we don't do our mission."

Who owns the ERM mission?

The requirements of M-19-21, the emphasis on data-driven government that was codified in the Foundations for Evidence-Based Policymaking Act in early 2019 and the broader push for digital transformation have combined to put many cooks in the information-management kitchen. The group said there are now more opportunities to make ERM central to agency missions but also more risk of competing priorities. Therefore, it's especially important to "hash out and distinguish the roles and responsibilities given the push on data governance," one participant said.

The Evidence Act "is very ambiguous in some respects," that official added. "We're working through who's supposed to do what and who has authority to do what. We're actually developing a lexicon so that the tech side and the metadata contingent can speak to the records contingent and everybody really knows what we're talking about."

"We've got a whole lot of chiefs over in the office of the CIO," another

official said, "and nobody knows who's doing what and how they're all connected — and more importantly, how we are connecting with them on records management."

COVID as catalyst

The year-long emphasis on maximum telework and new priorities prompted by COVID-19 have hindered some M-19-21 efforts, especially for agencies that are working to digitize vast archives of paper records on-site. For the most part, though, participants said the pandemic has accelerated agencies' embrace of digital tools that will make ERM easier.

One official said agencies won't go back to paper-based processes, while another noted that "since March, people have stopped asking for paper. So my assumption is they're still doing the same jobs, they're just finding the information elsewhere."

The downside may be a surge in electronic records. Collaboration tools that were being tested in small pilot projects or still on the drawing board are now being used constantly, one participant pointed out. "That's generating a whole new source of information — like this [roundtable] meeting being recorded."

At least one participant was skeptical that agencies wouldn't simply go back to old ways when public health precautions allow. "I wonder how we can measure success against that until we get back and re-engaged face-to-face and see what's left over of that culture," the official said.

Another expressed concern that budgets will be further squeezed by all the new pandemic-prompted priorities, which could make it impossible to hit the M-19-21 deadlines.

"I do think we need an extension," but not because of COVID-19, the official said. "We need an extension because, more and more and more, we understand the complexities of moving forward." ■



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Note: FCW Editor-in-Chief Troy K. Schneider led the roundtable discussion. The Dec. 10, 2020, gathering was underwritten by Quality Associates Inc., but both the substance of the discussion and the recap on these pages are strictly editorial products. Neither QAI nor any of the roundtable participants had input beyond their Dec. 10 comments.



