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Principal challenges facing electronic records management in federal agencies today

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1. Introduction

Over the past several years, SRA International¹ has served as a contractor to several federal agencies in various aspects of records management. Among other projects, in 2000–2001, SRA carried out a government-wide survey for the National Archives and Records Administration (NARA) which was published as *Report on Current Recordkeeping Practices within the Federal Government*.² In 1997–1998 SRA conducted a business process re-engineering for the Environmental Protection Agency (EPA) with respect to its regulatory docket filing facilities; SRA performed similar services for the Department of Transportation. In 2001–2002, SRA is assisting EPA in developing an agency-wide electronic document management (EDM) and electronic records management (ERM) system.

These activities have involved not only systems integration functions but also conducting interviews, debriefings, focus groups, and paper-and-pencil questionnaires with hundreds of federal employees, as well as private sector companies. For the NARA and EPA work, SRA has gathered the perceptions of federal Chief Information Officers, General Counsels, Inspectors General, information technology staff, records managers, and staff carrying out the day-to-day duties of conducting federal programs. The company has also interacted extensively with firms marketing software systems to federal agencies and firms engaged in systems integration and implementation.

This article is a distillation of the foregoing experience and reflects the educated opinions of the authors and many SRA experts. The article attempts to delineate the frontiers of ERM in the federal government at the present time.

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2. Challenge of e-mail records management

The biggest single worry federal agencies have in the records management field today is how to capture e-mail records. The agencies recognize that e-mail constitutes their greatest source of liability in the event of litigation, FOIA requests, congressional investigation, or media exposure. Policy in most agencies stipulates that, when an e-mail qualifies as a record, it should be printed out and saved in paper format. Most agency staff will say they doubt the policy is widely known or being carried out at all and they have no enforcement mechanisms. Compliance is up to each individual at his or her desktop.

Moreover, the volume of e-mail for business transactions has grown to the point that a print-to-paper policy is impracticable. Department of Energy (DOE) records management personnel say the department is processing one million e-mail messages per business day. The logistics of deciding daily whether each of these messages is a record and whether it should be printed out and filed surpass DOE's administrative capabilities. At DOE and other agencies, the primary focus of pilot projects in ERM is e-mail; other records can come later. Add to this the fact that, at many agencies, systems administrators adopt the practice of deleting all e-mails from users' in-boxes after the messages reach a certain volume or date limit. If users are not transferring record materials out of their in-boxes to a records management system or other storage, the records are simply lost.

Many components in the Department of Defense (DoD) have decided to cope with this problem by saving *all* emails and software vendors have responded with products to assist them. OTG Software, Inc., for example, offers EMAILxtender³ that performs e-mail "archiving," meaning the product burns all e-mails onto optical disks. This is not records management but a kind of minimal safeguard measure, mixing record and nonrecord material together on a storage medium. These DoD components are not, in fact, managing the e-mails as records; they are simply putting them in storage and deferring the management to some later date.

3. Not an integral component of information technology planning, systems design, and architecture

A key problem with ERM in federal agencies is that records management in general, let alone ERM, has not been an integral component of information technology (IT) planning and systems design. When IT managers sit down to figure out what kinds of systems they will need to manage agency information resources, they do not take records into account. They are not habituated to think that the eventual automated retirement and disposition of data in IT systems is an IT planning and design function, as well as an integral part of program planning and design. Neither IT nor program personnel understand the business and legal imperative of separating federal record information from nonrecord information, the importance of disposing of record materials in a prescribed manner and of destroying nonrecord materials. Saving information the enterprise should have destroyed can be just as harmful as destroying information that should have been saved.⁴

Part of the problem is traceable to basic terminological misunderstandings; the words

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