



NATIONAL
ARCHIVES

OFFICE *of the*
CHIEF RECORDS
OFFICER

Records Management Self-Evaluations by Agencies

Assessment Report

National Archives and Records Administration
March 2021

INTRODUCTION

The National Archives and Records Administration (NARA), based on authority granted by [44 United States Code \(U.S.C.\) 2904\(c\)](#), 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. Under this authority, NARA conducts records management (RM) oversight of Federal agencies, including agency inspections and assessments. An assessment is a multi-agency evaluation of a specific topic, issue, or activity affecting RM processes, procedures, or policies.

In the fourth quarter of FY 2020, NARA conducted this assessment to determine the effectiveness of evaluation tools and processes used by selected agencies to measure the performance of their records management programs. From this analysis, NARA also identified challenges and best practices related to self-evaluations that can be shared with the Federal RM community.

The participating agencies include three Department component agencies and four independent agencies (See Appendix A). To provide a well-rounded analysis of records management compliance across multiple levels of the Government, NARA analyzed the data gathered through the annual Records Management Self-Assessment (RMSA) to identify a varied group of agencies that had completed some type of evaluation or none at all. The findings in this report are based on the analysis of information provided by the agencies via completed questionnaires, interview responses, and data call documentation. Requested documentation included agency policies, procedures, recent evaluations, evaluation tools, findings, plans of corrective action, reports, and any other documentation that support self-evaluation processes and provide evidence of agency follow-up activities.

This report summarizes six findings and recommendations, and identifies challenges and best practices as they relate to the implementation of agency self-evaluations of RM programs.

SUMMARY AND ANALYSIS

The [Code of Federal Regulations, Chapter 36, Subpart B, 1230.34\(j\)](#), requires agencies to “conduct formal evaluations to measure the effectiveness of records management programs and practices, and to ensure that they comply with NARA regulations.” In addition, [Office of Management and Budget \(OMB\) Circular No. A-123](#) establishes requirements that provide for enhanced accountability and program operations by Federal managers through the identification, assessment, management, correction, and reporting of internal agency controls.

Despite the regulations and guidance noted above, NARA found that gaps exist in how agencies evaluate their records management programs. According to the [NARA Federal Agency Records Management – 2018 Annual Report](#), agencies reported that they “have taken steps to direct and support an evaluation or auditing process for their records management programs.” However, the steps taken and the manner in which agencies evaluate their programs for compliance of NARA directives is unclear. The annual report’s findings also identified a need for NARA to examine agencies’ evaluation practices to gain a better understanding of how, and in what ways they are implemented across the Federal Government. This assessment points to differences in agencies’ evaluation practices and the barriers that prevent all agencies from fully adhering to federal guidelines.

DEFINITION OF RM SELF-EVALUATIONS

NARA defines an evaluation as “the selective or comprehensive inspection, audit, or review of one or more Federal agency records management programs for effectiveness and for compliance with applicable laws and regulations. It includes recommendations for correcting or improving records management policies and procedures, follow-up activities, including reporting on and implementing the recommendations.” However, NARA has not clearly defined the requirements of agency conducted self-evaluations. As a result, there are various evaluations methods that agencies have adopted, including formal self-evaluations, and informal and ad-hoc reviews or program checks (e.g., records inventories, on-site visits, staff interviews, records disposition and transfer tracking, and training).

NARA does provide two resources, the [Federal Records and Information Management \(RIM\) Maturity Model User Guide](#) and the [Records and Information Management Self-Evaluation Guide](#), which are not required for agency use but do provide some guidance on how to evaluate RM programs. While the maturity model’s focus is the evaluation of RM activities from an enterprise-wide standpoint, the self-evaluation guide provides guidance on evaluating RM from a program-level perspective. The latter lists a number of suggested evaluation questions but does not provide clarification on NARA’s definition of a self-evaluation. The assessment findings reveal that a number of agencies report their awareness and/or use of the model, but none of the agencies acknowledge use or knowledge of the self-evaluation guide for their purposes.

Finding 1: The understanding and use of evaluations remains unclear to agencies.

Recommendation 1: NARA should determine ways to publicize its existing guidance to agencies; and evaluate this guidance to determine whether clearer instructions and additional resources are needed to provide guidance that clearly describes expectations for each element and step of the evaluation process as referenced in 36 CFR 1230.34(j) (i.e., “recommendations

for correcting or improving records management policies and procedures, and follow-up activities, including reporting on and implementing the recommendations”).

AGENCY SELF-EVALUATIONS METHODS

From the information collected during the assessment process, two agencies conduct self-evaluations that meet the NARA definition of evaluations and sufficiently ensure proper reporting of findings, recommendations, and follow-up reporting activities. Of the agencies that do not conduct formal self-evaluations, one agency considers its participation in Department-level evaluations as proof of its own self-evaluation activities. However, NARA found that the Department’s review was of its document management efforts and not records management. Another agency considered its review of its results in the annual RMSA, SAORM report, and Federal Email Management report as evidence of its conduct of a self-evaluation. Other agencies either assess specific aspects of their programs and are still developing more formal evaluation policies and practices for future implementation, or do not currently self-evaluate their RM programs.

Finding 2: Agencies are not conducting regular and consistent self-evaluations.

Recommendation 2: Agencies must develop procedures that require RM programs to conduct self-evaluations on a regular basis to ensure RM processes are compliant with 36 CFR 1230.34(j) and agency requirements.

POLICIES AND PROCEDURES

Only three out of seven agencies have policies that require self-evaluations. Of the four agencies that do not cite evaluation guidance in its policies, one agency indicates its reference of the topic in its guidance, but upon review of their documentation, it was found that evaluations are implied rather than clearly stated. Another agency relies on its Department-level guidance rather than establishing its own guidance for its agency’s policy manual. Two other agencies do not have policies that reference self-evaluations, but one agency is currently drafting a revised policy that incorporates the requirement for approval and use next year. The other agency does not reference evaluations in its guidance and does not know when its policy will be revised to include it.

While all agencies do not have specific policies that address evaluation requirements, the majority of participants do update their policies and procedures after conducting either formal self-evaluations or other informal program review activities. The updates are completed to mitigate future RM issues. In instances where the policy and procedural updates occur upon the resolution of specific RM challenges, reviews of guidance and instructions often occur more infrequently and on an inconsistent basis.

Finding 3: Internal agency policies do not include the requirement to conduct RM evaluations.

Recommendation 3: Agencies must develop and implement a policy [or policies] that includes RM evaluation requirements in accordance with 36 CFR 1220.34(j).

Finding 4: Agencies do not review and update policies and procedures on a regular basis to ensure RM compliance.

Recommendation 4: Agencies should review policies and procedures to ensure they reflect federal RM requirements and update policies, as needed, when the self-evaluation identifies policy and procedure gaps.

RM EVALUATION PROCESSES AND TOOLS

Agency Evaluation Processes and Tools

A majority of agencies adopt the use of dashboards, stoplight charts, and scorecard tools to measure and monitor the progress of RM operations, whether formally or informally. These agencies find the concept of using scores, grades, and colors (red, green, and yellow) to determine office/program compliance and participation in RM evaluation activities as an effective way to report successes and deficiencies at the agency; identify offices/programs that require additional RM assistance and training; and enhance motivation for RM compliance. The tools also prove beneficial in helping senior officials to understand RM program needs and the status of various compliance efforts.

Agencies who completed self-evaluations use the evaluation tools to examine some, or all of the following areas: electronic systems and records, file plans, permanent records, proper schedule application, policy guidance, records transfers, and training. These focus areas were also addressed to some degree through informal review activities where the agencies identified specific issues, needed improvements, and solutions, but failed to provide sufficient follow-up or corrective action to improve performance and accountability, and tracking and reporting. With further development, these foundational review measures taken by the agencies may be used to form more robust and formal agency self-evaluations.

External Evaluation Tools

NARA requested agencies' feedback on their use of the following NARA evaluation reports and tools for the development of their self-evaluations: Agency Assessment Reports, Agency Inspection Reports, Federal Email Management Reports, the *Federal RIM Maturity Model User Guide*, the RMSA, and the SAORM report. They were also asked to identify other resources such as guides and evaluation questionnaires, derived from NARA or external sources such as other Federal agencies and professional organizations for such use.

Four agencies note their use of agency assessment and SAORM reports. Three agencies identify the use of agency inspection reports with one agency noting its specific review of reports of similar agencies to strategize directions and tools towards better RM compliance. The RMSA is widely used among the participants. Each of the agencies in the assessment participate in the annual RMSA reporting and six identify their use of the assessment to inform the development of evaluation tools. Most agencies report that they track RMSA scores to determine and monitor their programs' weaknesses and to prioritize compliance issues for upcoming strategic plans. They also note that there are differences between NARA's RMSA data and agencies' internal evaluation results due to the different scope and agency-specific focus of internal assessments.

Two agencies each refer to their use of the *Federal RIM Maturity Model User Guide* and the Federal Email Management Report. The agencies utilize the maturity model for the ongoing development of their self-evaluation processes and note it as a satisfactory resource for determining compliance at the enterprise level, but not as effective in addressing issues at the program level. As for the use of other NARA or external resources, four agencies identify their use of other tools, but did not specify what they were and as noted earlier, none of the agencies identified NARA's *Records and Information Management Self-Evaluation Guide* as a referenced resource. One agency reports that it does not use any of the NARA resources.

AGENCY RESOURCES IN SUPPORT OF SELF-EVALUATIONS

Organizational Position of RM Programs

Where RM programs are situated organizationally within agencies can play a role in their ability to obtain important resources that support their programmatic goals. For one agency that completes self-evaluations, its partnership efforts and inclusion within its agency's Information Technology division allows for the considerable allocation of funds from the division's budget to support its projects. Two other programs, who have yet to conduct self-evaluations, expressed challenges that their RM programs face due to their current location within their organizations. For each, there is a possibility that their programs will be moved from their current organization to another, and it is anticipated that such changes will attract greater visibility for RM program needs, enhance the programs' position within the agency, strengthen RM policy initiatives, increase resources for self-evaluations, and lead to increasing support and communication from the SAORM.

SAORM Support

The assessment identified a direct correlation between SAORM support of the RM program and the execution of RM self-evaluations at agencies. Four agencies that are developing or have implemented a self-evaluation process, report positive relationships between the SAORM and the RM program. The officials are directly involved in the formal evaluation process, advocate for the support of RM initiatives to other senior and management officials, issue directives

requiring staff cooperation with evaluations, and ensure resources are readily available to the RM programs for conducting self-evaluations. While some agencies did not report that their RM programs receive considerable support, they do indicate increasing support and awareness for RM program needs.

For three agencies that did not complete formal self-evaluations, SAORM support for the RM program is either lacking or does not exist at all. Each of the agencies report that SAORM oversight is also critical in the programs' ability to guarantee program/office participation and accountability in self-evaluations and overall compliance goals. The absence of such support negatively impacts implementation, including securing the needed funding and tools. The need for leadership support, better resource allocation, and increased visibility to meet RM goals are key motivations for some RM programs' desire to move to different organizations. Additional staff is another important resource that agencies seek to improve their ability to develop self-evaluations, analyze the data, and ensure follow up and corrective action. One agency noted that its small staff is overwhelmed with RM responsibilities, affecting its ability to conduct effective self-evaluations. To assist RM programs, NARA should continue to work with the SAORM community to support the distribution of key resources that ensure the implementation and execution of agency self-evaluations.

Finding 5: Strong SAORM support is necessary to implement an effective RM self-evaluation program.

Recommendation 5: SAORMs should advocate for and ensure that agency self-evaluations are conducted consistent with NARA requirements.

Finding 6: Agencies lack staffing to support effective RM evaluations and compliance activities.

Recommendation 6: Agencies should allocate resources to ensure the implementation of an effective RM evaluation program.

Staff Engagement and Training

Agencies report multiple methods of engaging with their RM network staff and other program stakeholders to communicate RM evaluation needs, including voluntary and mandatory RM meetings, seminars, and general and role-based training. Some agencies also conduct regular and periodic one-on-one training sessions and on-site interviews to address deficiencies with program/office staff. One agency's SAORM issued a directive and met with program directors to ensure that programs/offices support RM evaluation efforts. In addition, this agency also issued instructional guidance to assist its regional program staff with preparing for and participating in on-site, as well as the virtual self-evaluations conducted during the COVID-19 pandemic. Although another agency has a considerable RM network, its lack of a communication network between the headquarters and field RM staff is negatively affecting self-evaluations and general RM awareness across the agency. The lack of external NARA RM

training was also a concern for a couple agencies. Despite NARA's online RM training resources, they indicate that the termination of NARA's face-to-face RM Knowledge Area Series and its agency-specific RM training, affect their ability to bring RM managers, custodians, and liaisons up to speed on RM matters.

AGENCY BEST PRACTICES

Veterans Benefits Administration (VBA)

VBA's evaluation methods reflect the program's continuous and coordinated efforts to analyze RM issues at headquarters and regional offices. The RM program routinely engages with its component Department and VBA officials, IT program staff, and its nationwide RM network. The agency includes a number of best practices in the areas of program engagement; IT resource allocation; policy and directives; procedural guidance issuance; comparative data analysis; remediation and monitoring processes; and deficiency-specific training. During on-site evaluations, the RM team consults with staff to determine RM awareness at its facilities and follows up with training opportunities. Evaluation results and findings are compared over time to develop strategic plans and compliance measures.

Pension Benefit and Guaranty Corporation (PBGC)

PBGC's targeted self-evaluations are supported through the coordination of its RM program, SAORM, and a Business Council that approves evaluation topics for annual self-evaluations. The agency employs the use of policy mandates, roadmap tools, and impressive stoplight and scorecard methods to track and incentivize RM progress, keep records coordinators and programs engaged with RM responsibilities, and to analyze findings for trends and strategic planning. To address identified weaknesses, the RM program provides one-on-one training meetings with its records coordinators to ensure they understand recommendations and can implement the required follow-up corrective actions.

Other Examples by Agencies

NARA identifies RM best practices in its previous agency assessments and inspections reports. Inspection reports for the [Department of Justice Records Management Program](#) and the [Department of Defense Office of the Secretary of Defense Records Management Program](#) include notable examples of agency self-evaluation processes.

CONCLUSION

Agencies view self-evaluations as beneficial for garnering support for resources that address RM challenges. To support these efforts, agencies expressed considerable interest in the development of NARA resource guides that clarify the self-evaluation process and include evaluation checklists, detailed training on evaluation procedures, FAQs, and examples of evaluations that

agencies can adopt to enhance their processes. In particular, specific evaluation guidance that addresses the different needs of agencies of all sizes, including micro and small agencies with few records management staff and resources, is also requested. For its existing self-evaluation guides, NARA should determine whether updates are required and enhance visibility to ensure wider agency use. Finally, some agencies encourage additional NARA assessments and inspections to highlight other RM issues and motivate senior management to support RM initiatives at their agencies.

Appendix A
List of Participating Agencies

Court Services and Offender Supervision Agency of the District of Columbia
Department of Commerce, Census Bureau
Department of Homeland Security, United States Citizenship and Immigration Service
National Archives and Records Administration (Corporate Records Management)
Pension Benefit Guaranty Corporation
Postal Regulatory Commission
Department of Veterans Affairs, Veterans Benefits Administration