



2011 RECORDS MANAGEMENT

SELF-ASSESSMENT REPORT

*An Assessment of Records Management
Programs in the Federal Government*

NATIONAL ARCHIVES *and* RECORDS ADMINISTRATION

FOREWORD

The National Archives and Records Administration (NARA) conducted the third annual Records Management Self Assessment (RMSA) and analysis from May through September 2011. NARA uses the annual RMSA as a tool to monitor and oversee Federal records management programs. The work reflected in this report was accomplished prior to the issuance on November 28, 2011, of the Presidential Memorandum on Managing Government Records which requires each agency to designate a senior official to supervise an evaluation of the agency's records management program.

The RMSA provides insights into Federal records management programs in response to specific questions. Data from the assessments reveals specific areas of weakness in common to the majority of Federal records management programs. The responses to the Presidential Memorandum should provide additional insights into existing records management activities, areas of concern and current plans to address them, and other critical aspects of Federal records management that may not be adequately addressed in current regulations or initiatives. The data from all the RMSAs, in conjunction with agency submissions in response to Section 2(b) of the Presidential Memorandum, will give NARA a Government-wide base of information from which to develop the Records Management Directive required in Section 3.

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EXECUTIVE SUMMARY

In May 2011, the National Archives and Records Administration (NARA) issued the third annual mandatory records management self-assessment (RMSA) to Federal agencies.¹ The goal of the self-assessments is to determine whether Federal agencies are compliant with statutory and regulatory records management requirements. It is one mechanism, with many others including inspections, electronic records scheduling reports, and other data-collection activities, that NARA employs in our role as the oversight entity for Federal records management.

This year, we received responses from all Cabinet-level departments and most independent agencies.² As we did in the two previous RMSAs, we scored selected questions and assigned each agency a total score that placed them in the Low, Moderate, or High risk categories. This year there has been a slight increase in the number of agencies that scored in the Low Risk category. The low, medium, and high rankings described in this report are only one indicator of an agency's compliance with Federal records management regulations and policies, and should not be construed as a definitive determination of compliance.

Many of our findings have changed little from last year, especially those relating to records management program activities and records disposition. Training, compliance monitoring, and management of electronic records continue to be significant issues. This year respondents were required to submit additional data or documentation to support their answers to 12 questions, and in our analysis of the materials we received we found some discrepancies with agency self-reporting.

Our key findings are:

- Most agencies do not have adequate controls for major activities of their records management programs;
- Many records management staff have insufficient knowledge and understanding of electronic records, which leads to the continued implementation of poor recordkeeping practices;
- The majority of respondents provided materials that did not support their responses to one or more questions in the self-assessment; and
- Nearly a quarter of the respondent agencies do not conduct records management training for their senior officials.

¹ The 2009 RMSA Report is available via <http://www.archives.gov/records-mgmt/resources/self-assessment.pdf>
The 2010 RMSA Report is available via <http://www.archives.gov/records-mgmt/pdf/rm-self-assessment.pdf>

² See Appendix II for a list of non-respondent agencies.

NARA can report that some agencies are using the results of the self-assessment to improve their records management programs. This year's data reveals that a number of agencies either have, or are working on, guidance for managing records in social media and web 2.0 platforms as well as cloud computing environments. Agencies acknowledge the need to have performance metrics for their records management programs, and several have established sophisticated metrics that can serve as a model for others. Finally, agencies are increasingly using the Electronic Records Archives (ERA), NARA's strategic initiative to preserve and provide long-term access to the electronic records of the Federal Government, to transfer their permanent electronic records. In the discussions of the topical sections to follow we point out some of these positive developments.

However, agencies still struggle to manage a voluminous amount of textual records while simultaneously facing the technological challenges of preserving records created and maintained in electronic format. Agency comments and the documentation some submitted to verify responses indicate that records management staff in many agencies lack knowledge and understanding of basic records management principles and concepts, particularly those pertaining to electronic records. The education and training of staff responsible for managing agency records is key to enabling agencies to meet the challenges they face in managing and preserving Federal records.

In our 2010 report, issued in March 2011, NARA made a number of recommendations for executive action. Upon reviewing the data from this year's self-assessment, we determined that while some progress is being made, our recommendations from 2010 still hold. We have two additional recommendations based on the 2011 data.³ They address the need for agencies to establish verifiable performance measures, and to establish annual electronic records training requirements for records management personnel. We see encouraging signs that agencies are increasingly aware of the value of their records managements programs, and we strongly urge them to continue this forward momentum in the challenging years ahead.

AUTHORITY

Under 44 United States Code (U.S.C.) 2904 and 2906, NARA has the authority to inspect the records management practices and programs of Federal agencies. NARA evaluates agencies for compliance with the requirements stated in 44 U.S.C. Chapters 31 and 33 and the regulations issued in the Code of Federal Regulations (CFR), specifically Subchapter B—Records Management of 36 (CFR) Chapter XII, and reports its findings to the appropriate oversight and appropriations committees of Congress and to the Director of the Office of Management and Budget (OMB).

³ See Appendix I for the consolidated 2010 and 2011 Recommendations for Executive Action.

BACKGROUND

In 2009, NARA established an annual requirement that all Federal agencies subject to the Federal Records Act (44 U.S.C. Chapter 31) perform records management program self-assessments and report the results to NARA. NARA's records management self-assessment report presents this data, explores significant findings, and provides recommendations for improvement. Overall, this report provides a baseline measure of the effectiveness of records management programs and practices in the Federal Government.

In FY 2009, NARA conducted the first self-assessment as a pilot. The questionnaire was limited in scope and included no validation questions. For the FY 2010 self-assessment, we increased the overall number of questions and significantly reduced the opportunities for open text responses. We also conducted limited validation of six questions.

METHODOLOGY

Based on our experience conducting the previous self-assessments, we added two new features to the 2011 questionnaire. We established a more extensive validation process to verify agencies' responses to certain questions. We also identified a set of "core" questions covering the essential elements of a compliant Federal records management program.

This year we also expanded the section on electronic records. We merged the sections on records management programs and records management activities, and we incorporated the vital records questions into the oversight and compliance section. The special focus questions this year addressed agencies' oversight of their records management practices; and transferring permanent records to NARA.

In March 2011, we held two focus groups with agency records officers. The focus groups reviewed a total of 20 questions that were new to the RMSA for FY 2011. NARA incorporated the results of the focus group sessions into the final questionnaire.

NARA notified Agency heads and Federal records officers of the self-assessment in early April 2011, 30 days in advance of its distribution on May 2. The survey tool was open for the agencies' access from May 2 through June 3. During this one-month period, we sent weekly reminder e-mails with the link and survey instructions. Agencies could review and make changes to their responses through June 17. The survey tool was closed during these final two weeks, but respondents could request amendments by e-mail.

We sent this year's self-assessment to 276 agencies. Of those agencies, 247 or 89 percent submitted responses, which is down 4 percent from 2010. All Cabinet-level agencies and all agencies under the Executive Office of the President responded to the RMSA. Ninety-three percent of Cabinet sub-agencies and bureaus, and 81 percent of independent agencies, also submitted responses to the survey.

From June through August, we analyzed the data and conducted the validation process. We also sent each respondent agency a preliminary report of their results.

Scoring

This year's survey has four main sections: Records Management Program—Activities; Records Management Program—Oversight & Compliance; Records Management Program—Records Disposition; and Records Management Program—Electronic Records.⁴

There are 100 possible points in the 2011 RMSA. The scoring is distributed across sections as follows:

Maximum Point Values (per section)

1. Records Management Program—Activities (20 points)
2. Records Management Program—Oversight & Compliance (22 points)
3. Records Management Program—Records Disposition (13 points)
4. Records Management Program—Electronic Records (25 points)
5. Special Focus (20 points)

An agency's overall score determines its risk category. The risk categories are consistent with the previous RMSAs, and we developed them as a data-driven, systematic way to provide agencies with a comparative view of their records management programs. Agencies can use the risk categories as a measure to determine if their programs are performing their critical function, which is to assure the integrity, authenticity, and reliability of the records they create in the course of Federal business.

The risk categories are:

- Low Risk: Scores 90–100
- Moderate Risk: Scores 60–89
- High Risk: Scores 0–59

We changed the way we are reporting the scores this year for departmental and component agencies. Previously we provided an overall average score for Cabinet-level agencies, incorporating the scores of their components along with the scores of the headquarters level records officers. However, from previous RMSA results we have seen that records management programs within agencies can be organized in many different ways. Some are centralized, and others are decentralized amongst their component agencies. Given this complex environment, we listed the scores for the department and component agencies separately and do not provide an overall average score.

Agencies should take special note of the scoring for the core and the special focus questions.⁵ The special focus scores reflect performance in one particular area, and we change the topic each year so those scores are best viewed in the context of that one program area in that particular year. The core questions may change from year to year, following developments in technology, regulatory actions and guidance from oversight entities including NARA, and other external factors.

⁴ Appendix III contains the full text of the survey questions by section, questions marked as Core or Special Focus, and a breakdown of the response counts and percentages per question.

⁵ We break out those scores in Appendix V: Core Questions, Special Focus Questions, and Total Score by Risk Factor.

Finally, for the 2011 RMSA NARA conducted a more intensive verification program on selected questions in the survey. For some questions involving records management directives, performance metrics, evaluations and inspections, exit briefings for senior officials, and other policy and procedure, we requested agency documentation that we evaluated against NARA guidance and Federal regulation. For a small set of questions about records scheduling activities and permanent records transfers, we requested data to confirm these transactions and checked the information we received against internal NARA tracking. We also followed up directly with agencies if we had questions about the materials or data they provided. In some instances this required multiple contacts with the agencies and other parts of NARA including archival and appraisal units.⁶

⁶ For a listing of the questions validated and overall percentages of responses NARA was able to verify, see Appendix IV: Results of Verification of Documentation Submitted for Validation Questions.

SECTION ONE:

Records Management Program Activities

NARA examined three aspects of records management activities in this section of the 2011 RMSA: records management roles and responsibilities, directives, and training. The questionnaire listed 23 questions in these areas, 7 of which we identified as core questions. We subjected one question in this section to our verification processes: we asked agencies if they had a records management directive, and if they said they did we asked them to provide a copy of it. We then evaluated the directives against Federal regulations and NARA guidance.

Findings

- Agency responses within these areas remain largely unchanged from previous RMSAs;
- Agencies do not track training attendance metrics, and this may signify a weakness in their controls;
- Agencies are not developing internal, agency-specific training; and
- Training for senior officials continues to be a concern.

Records Management Roles and Responsibilities

Records management serves a unique function within the Federal Government, since all personnel are responsible for identifying Federal records and ensuring their records are properly managed according to a NARA-approved records schedule. In the three RMSAs to date, NARA has asked questions regarding staffing to explore correlations between records management staffing levels and an agency's ability to meet the regulatory requirements. In some areas, like staffing levels for the agency records officer and records liaison officers (RLOs), we see relative consistency from year to year. In our analysis of the 2010 RMSA, we came up with a baseline number of approximately one (1) full-time equivalent (FTE) with assigned records management duties for every 1,460 Federal employees. The data from the 2011 survey did not change significantly from FY 2010.

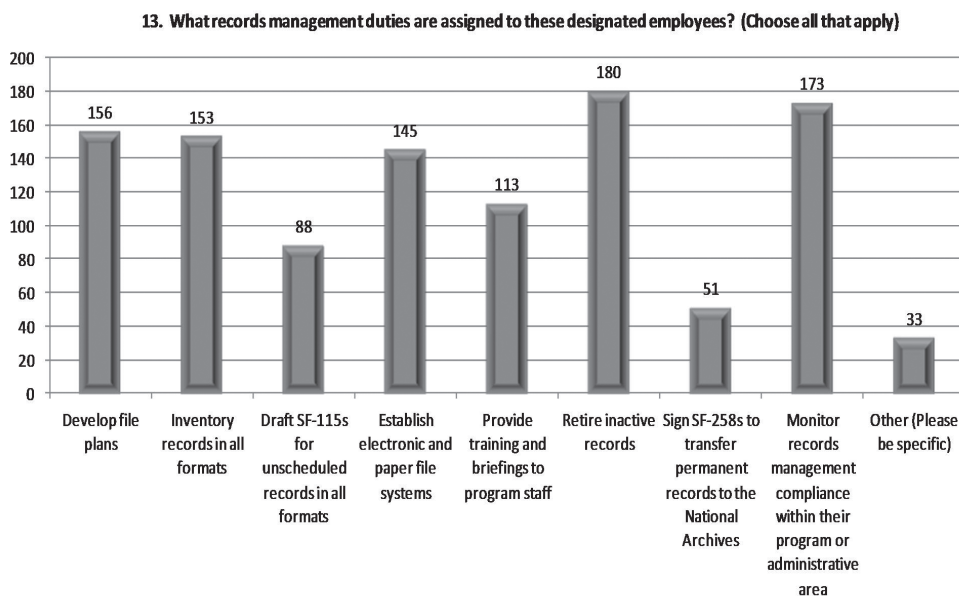
We added a new question this year to investigate the collateral duties performed by records officers who report records management as a part-time duty. We asked whether records officers also had oversight responsibility for information management in their agencies. We defined information management as activities encompassing Privacy Act, Freedom of Information Act, web and social media programs, and information security. Forty-three percent of agencies indicated that their records officers are responsible for information management activities in addition to records

management. This correlates to the percentage of records officers (41%) who responded that records management is a collateral duty.

We asked about the number of full-time equivalent (FTE) positions agencies have assigned to records management, and agencies mostly said that they have either 1 FTE (32%) assigned or somewhere between 1 and 10 FTE (43%). We also asked whether agencies have established a network of Records Liaison Officers, and just over 80 percent responded that they have such a network of RLOs; this percentage is essentially unchanged from the 2010 survey.

We asked a new question in 2011 regarding the types of records management duties assigned to RLOs. We gave agencies several answer options, and from their responses we see that the RLOs are predominately doing records retirement, inventories, and file plan development.

Figure 1: Question 13: What records management duties are assigned to these designated employees? (Choose all that apply)



Records Management Directive(s)

Records management directives establish program objectives, responsibilities, and authorities for the creation, maintenance, and disposition of agency records. Required under 36 CFR § 1220.34, directives describe requirements and responsibilities for all staff to follow. They are a foundational component of an agency's records management program and serve as a compliance control measure.

Ninety-one percent of respondents stated that they have a records management directive. We asked them to provide a copy of it, as we did in 2010, and this year we subjected the directives we received to a more comprehensive verification process. In 2010, the same percentage (91%) of respondents stated they had a records management directive, but only 72 percent provided it to NARA as further

evidence of compliance. This year the percentage of agencies that provided directives to NARA increased by 11 percent, largely, we believe, due to our increased verification work which included direct follow-up contacts with agencies that did not initially submit the requested documentation.

We asked in 2010, and again in this survey, how recently agencies updated their directives. We see little change in the data here; 30 percent said they have not updated their directive since FY 2006 or earlier, and 2 percent said they do not know when it was last updated. This is of particular concern as agencies are not static entities, and organizational changes often lead to policy updates that a records management directive should cover.

From the documentation we received this year, we see that many agency directives continue to be well-written and compliant with regulatory guidance. We saw several that contained all or nearly all of the elements crucial to a successful directive: They establish a network of personnel assigned to the records management program and detail the various roles and responsibilities; establish the need for control over all non-record and record material, and the need to schedule all records regardless of format; mandate records management training; and promote oversight activities to ensure the guidance contained in the directive is followed agency-wide.

Records Management Training

The importance of training to the success of an agency's records management program cannot be overstated. Last year, we explored this issue in-depth as our special focus section. The data we see this year bears out many of our conclusions from 2010, including that most agencies have records management training programs in place although training for senior officials continues to be a major weakness.

Seventy-seven percent of agencies responded that they have a specific, formal training curriculum for employees assigned records management responsibilities, although some agencies commented that they send staff to attend NARA records management courses rather than developing their own, agency-specific training. NARA records management training provides a solid baseline of information about Federal records management, but the CFR requires that agencies develop records management training specific to their records management policies, procedures, and records schedules.

Some senior officials have received in-person records management training; however, in-person training is not performed "as a matter of standard procedure," due to resource limitations of the records management program. [Agency name withheld] posts information for senior officials on the agency intranet and provides briefings upon request to any senior official.

Respondent Comment

Seventy-four percent of the respondents said they have developed agency-specific training for all personnel, and 62 percent said they provided annual training sessions. However, we also asked for the actual numbers of employees who attended training in FY 2010, and we saw some responses that appeared inconsistent with the size of the agencies. These findings may indicate a weakness in internal controls for tracking training attendance in these cases.

This year we adjusted the questions to explore more fully the issue of training for senior officials and appointed officials. We asked whether agencies provided training for these senior managers, as a matter of standard procedure, on the importance of managing the records they create. Fifty percent of the agencies said they provide this training for all senior officials, and 25 percent said they do training for some, but not all, senior officials.

We asked who in the agency conducts records management training for senior officials. We provided a list including records management, general counsel, administrative, and IT staff, and we asked respondents to choose all that applied. Records management staff normally provide this training (84%), according to the responses, although other departments including “other” were cited in significant percentages; for example, about 37 percent of the respondents said their general counsels’ offices have this responsibility. We cannot see from the data how this duty is distributed across offices in individual agencies that chose multiple options. We also asked what topics agencies cover in their training for senior officials. The responses indicate that the identification of Federal records is covered most often (96%), followed closely by legal requirements (95%).

Finally, 23 percent of the respondents said they do not provide records management training for senior officials, and we asked them to cite reasons for this. They had the opportunity here to do a free-text response. Most commonly they said it had to do with staffing constraints, or they said that other parts of their organization were responsible for conducting such training.

Conclusion

This section focused on several important records management program areas: staff roles and responsibilities, records management directives, and training for Federal employees with records management duties and other FTE at all levels. The weaknesses we saw in previous self-assessments show in the data again this year. The roles and responsibilities of staff in records management programs still need further definition and refinement. Directives, where they exist, should be reviewed and updated frequently to incorporate changes in recordkeeping practices. Agencies’ records management training programs continue to be a concern. Many agencies do not appear to have developed a training curriculum, specific to their agency’s records, that would enable employees to effectively manage the records they create, maintain, and use. In addition, there is an ongoing lack of training for senior officials. NARA recognizes that substantial improvements to agency records management programs will take time, but a concentrated effort in these fundamental activities will be a positive critical step towards improving Federal records management.

SECTION TWO:

Records Management Program Oversight and Compliance

Oversight and compliance is one of two special focus areas in this year's survey. This topic encompasses activities to monitor and assess an agency's compliance with its records management policies and procedures. 44 U.S.C. Chapter 31 requires the heads of Federal agencies to establish records management programs that provide effective controls over the creation, maintenance, and use of records and provide standards and techniques designed to improve the management of records. 36 CFR 1220.30(c)(1) reinforces the requirement that agencies' records management programs must establish effective controls over records throughout their lifecycle. OMB Circular A-123⁷ requires agencies to develop and implement appropriate, cost-effective management controls for their programs and operations.

The questions in this section are designed to explore whether agencies have established effective records management controls and what type of controls are in place. We looked at what, if any, performance measures they have established for their records management programs. We also looked at the kinds of oversight activities agencies conducted to ensure that employees and contractors fulfill their records management responsibilities.

This section addresses the following topic areas: performance metrics and controls, evaluations/audits, and vital records. There are 20 questions in this section. Eight questions are core questions, and three relate to our special focus topics. Agencies were required to submit supporting documentation if they answered affirmatively to questions 24 (performance metrics), 27 (managing permanent records), and 37 (formal reporting on evaluations).⁸

Findings

- Most agencies do not have verifiable performance measures for major activities of their records management programs;
- A significant number of agencies have policies and procedures that do not include instructions for managing permanent records in all formats;

⁷ Available via http://www.whitehouse.gov/omb/circulars_a123/

⁸ See Appendix III for the full text of these questions.

- Agencies have not established adequate controls for their records management program; and
- There was no change from previous RMSA findings that records management programs are increasingly disengaged from the vital records function.

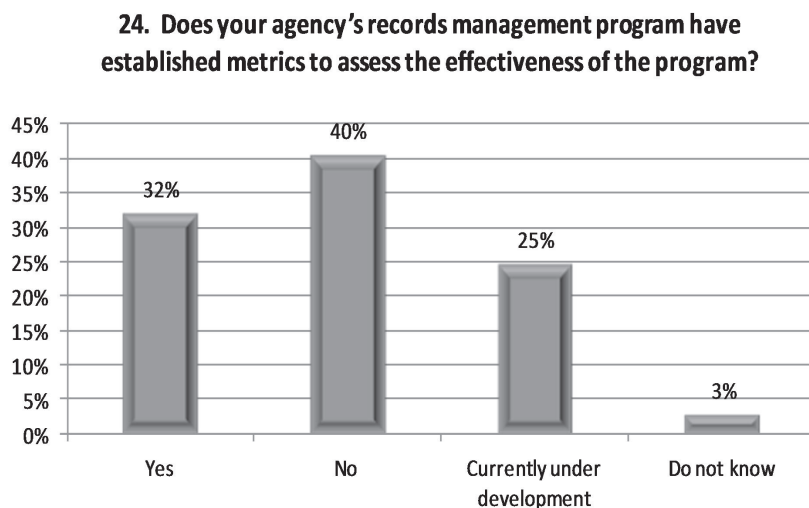
Performance Metrics and Controls

Performance Metrics

Performance measures are a way of reporting on a program’s progress, particularly towards pre-established goals. They can address the process behind a program activity (the type or level of activity being conducted), the products or services delivered by the program, or the results of those products or services.⁹ They help an agency determine if a program is operating efficiently and effectively.

We asked agencies if they had established performance metrics for their records management program. Less than one-third (32%) of agencies answered this question affirmatively. A small number of respondents commented that they needed clarification on the definition of “metric” or examples of metrics for records management programs in order to answer.

Figure 2: Question 24. Does your agency’s records management program have established metrics to assess the effectiveness of the program?



We asked the agencies that said they had established metrics to provide a copy of them for our verification processes. Of that group, two-thirds (67%) provided documentation that supported their answers. We found that many agencies’ records management metrics focus on a single activity—

⁹ GAO 11-646SP: Performance Measurement and Evaluation: Definition and Relationships (May 2011), available via <http://www.gao.gov/new.items/d11646sp.pdf>

retiring records, for example, or file plans or training. Some agencies provided metrics that only tangentially address records management activities.

A few agencies have developed sophisticated metrics, often in the form of dashboards and scorecards, for their records management programs. These metrics cover multiple records management activities such as training, staffing, file plan development, disposition of permanent and temporary records, scheduling records in all media, and program evaluation and follow-up. Metrics are gathered from sites throughout the organization, including field locations. Some measures are tracked monthly, others quarterly.

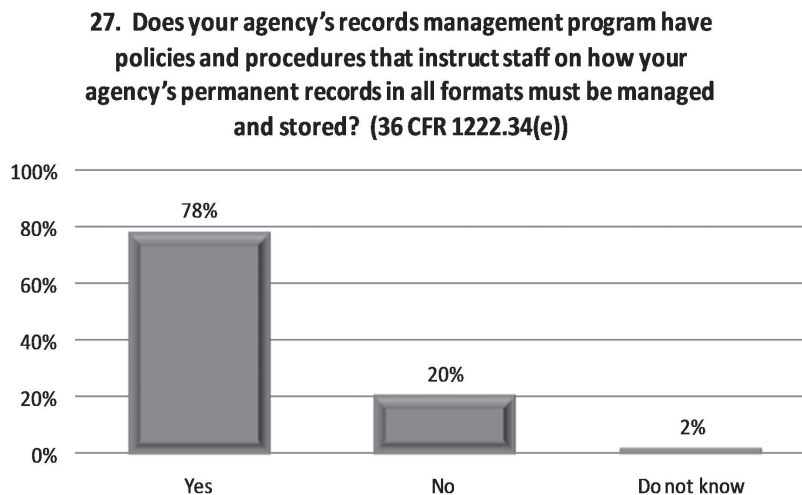
Of the remaining 68 percent of agencies that do not currently have metrics in place for their records management programs, 25 percent said they were in the process of developing them. This is a positive development that NARA will follow closely in future self-assessments.

Internal Controls

A key component of an agency's oversight of its records management function is the establishment of effective internal controls. Activities in this area should provide reasonable assurance that an agency is compliant, across its organization, with all Federal records management laws and regulations. These controls should enable an agency to accomplish its records management objectives.

At the highest level, controls are an agency's records management policies and procedures, which must be monitored and tested regularly to ensure they are functioning properly and are implemented at all levels.

Figure 3: Question 27. Does your agency's records management program have policies and procedures that instruct staff on how your agency's permanent records in all formats must be managed and stored? (36 CFR 1222.34(e))

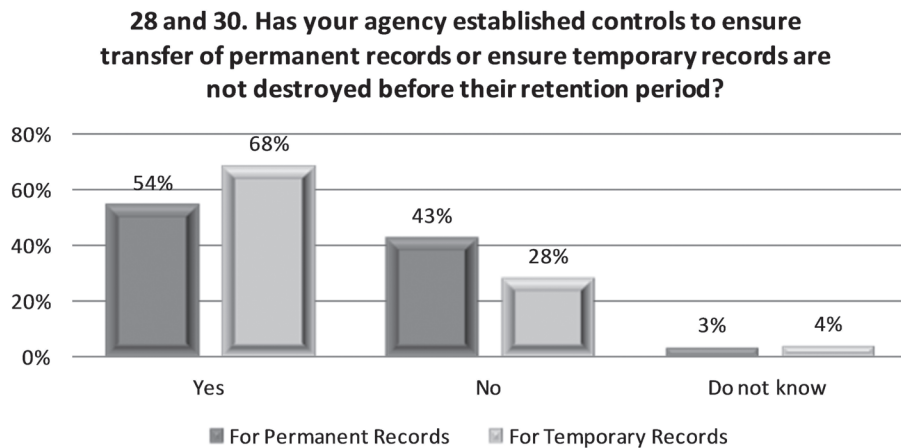


In this section of the survey, we focused on whether agencies had established effective controls for their records management programs. We asked specifically about the maintenance and transfer to NARA of permanent records in all formats; and actions to prevent the erroneous disposal of records. We also explored the mechanisms agencies have in place to ensure that their employees and contractors comply with their records management policies and procedures, and how they assess the effectiveness of their records management training programs. Finally, we asked a series of questions related to agencies' internal records management evaluation and audit activities.

Approximately 193 agencies (78%) answered positively to at least one question in this section. Two statistics stand out. First, only 54 percent of the agencies have controls in place to ensure that eligible permanent records, in all formats, are transferred to NARA in accordance with their approved records schedules. When asked what controls were in place, many agencies simply cited their records schedules and/or file plans. Others appear to rely on NARA to provide the transfer information to them. A few said only that their records are kept on backup tapes. Respondents did not indicate whether their controls are tested or monitored to ensure their effectiveness.

A reliance on NARA to provide transfer information for an agency's permanent records presumes that all the agency's permanent records are stored in a Federal Records Center prior to their transfer to NARA. In this situation records become eligible for accessioning by NARA archival units after a set period of time, and the Federal Records Center transfer and disposition processes are in some sense automatic. However, this control does not account for permanent records stored on-site or in other non-NARA locations. Instead of relying on external entities to provide information on their

Figure 4: Questions 28 and 30. Has your agency established controls to ensure transfer of permanent records or ensure temporary records are not destroyed before their retention period?



records, agencies should establish their own internal control mechanisms to ensure that all their records are accounted for and managed appropriately.

The practice of relying on file plans and records schedules pre-supposes that agencies keep all their records in a central filing location, that all file locations, including shared electronic space, have been identified, and that file plans are current and contain the necessary information. It also assumes that an agency's records schedules are current and comprehensive, that all employees are trained in their agencies' recordkeeping policies and procedures, and that follow-up activities are conducted to assess compliance.

We note, however, that some agencies reported having multiple controls in place including checks at different stages of the transfer process. In some cases, the records officer has direct oversight of this activity. A few agencies have well-defined metrics that we were able to verify against documentation they submitted to us. Others have controls built into their electronic recordkeeping systems, following best practices in electronic records management.

Another notable statistic is that only 68 percent of the respondents said their agencies have implemented controls to ensure that Federal records are not destroyed before the end of their retention period. Here, too, many agencies cited their records schedules and file plans as their controls, but they did not say whether these mechanisms are tested and enforced. A number of agencies cited training as a control, but they provided little information to confirm that the training is effective and has the desired results.

One important and necessary type of control for a successful records management program is regular evaluations of records management practices. We asked agencies a series of questions to determine whether or not they evaluated their records management processes on a regular basis. We asked first if they conducted evaluations. If they said yes, we asked when they last conducted an evaluation and who conducted it. We also asked whether a report was written, if senior officials were briefed, and whether there were any follow-up actions.

One hundred and seventy-six (176) of the 247 agencies that returned the 2011 RMSA said they conduct evaluations. This is a drop from the 196 of 251 that responded affirmatively to this question in the 2010 RMSA. In 2010, 72 percent of that group said the evaluations were conducted by their records management staff. This year, that number dropped to 55 percent. Based on this decline, it appears that records officers are relying increasingly on other offices within their agencies to take the lead in this oversight role. One consequence of this could be that evaluations and related oversight activities do not happen as frequently.

We also see, again comparing the 2010 responses to this year's, that approximately the same number of agencies said they briefed senior officials on the findings of the evaluations. The percentage that said a written report was prepared following an evaluation also remained relatively stable at just over 60 percent. This year, we requested copies of these evaluation reports. We reviewed this documentation, and we found that what we received could reasonably support an affirmative answer for 60 percent of the agencies that provided these materials. Some agencies sent us blank checklists or inventories,

and some sent reports that only tangentially referred to agency records, and more significantly did not discuss agency records management practices.

Just 33 agencies answered affirmatively to all the questions in this section pertaining to oversight and compliance activities. Of this small group, 20 provided sufficient documentation to support their assertions. From the RMSA data it appears that the remainder—226 of 247, or 92 percent—of the agencies that responded to this year’s survey either have significant gaps in their oversight activities, or they do not conduct oversight activity of any kind. If this is not corrected, these agencies will not be able to provide reasonable assurance that their records management programs are fully compliant with Federal records management laws and regulations.

Vital Records

36 CFR Part 1223, on Managing Vital Records, outlines vital records requirements for Federal agencies. To comply with §1223.14, an agency’s vital records program must contain all elements listed in Federal Continuity Directive (FCD) 1, Federal Executive Branch National Continuity Program and Requirements, Annex A.

Agencies must identify, protect, and provide access to their vital business records. Vital records fall into two categories: emergency operating records that agencies must maintain in order to meet their operational responsibilities during national security or other emergencies; and legal and financial rights records that protect the legal and financial rights of the Government and those affected by Government activities during emergencies.

For the 2010 RMSA, we reported on vital records as a separate topical section. This year, we included it in our discussion of Oversight and Compliance because it is a topic that is heavily addressed in Federal regulation. In this year’s responses, we see a continuation of the trend in which records management programs in Federal agencies are becoming increasingly disengaged from the vital records process. While 70 percent of records officers reported that their records management programs are represented on their agencies’ continuity-of-operations (COOP) teams, only 56 percent of that group said they conducted the vital records inventory for their agency.

Many agencies commented that this activity is now the purview of their emergency planning staff, which we see as an area of concern. We agree that emergency planners need to be aware of vital records, and other departments must be involved as well—for example, IT departments must be involved in the protection of an agency’s electronic records including those that can be classified as vital records. However, records officers also need to play an active role to ensure that records management is fully integrated into this process.

Conclusion

Compliance monitoring and oversight are vital functions of an effective records management program. Without well-defined metrics and strong internal controls, Federal agencies cannot ascertain the effectiveness and efficiency of their records management program, nor can they provide reasonable assurance that they are compliant with Federal records management laws and regulations.

Strong and effective records management processes support an open and transparent Government by ensuring that the records that undergird the functioning of our Government, protect the rights and interests of all citizens, and document the history of our nation are managed and maintained appropriately throughout their lifecycle.

Our findings in this section are mixed. We asked about the controls agencies have in place to ensure compliance with their records management policies and procedures, and for the most part we see that agencies do not have sufficient and well-defined performance measurements. Many agencies rely on records schedules, file plans, and high-level policies to serve as internal controls for their programs. These mechanisms alone, without testing and enforcement to measure effectiveness, do not provide reasonable assurance that an agency's records management processes are working. We also saw a lack of proper evaluation or enforcement activities to ensure that the controls agencies do have are being implemented. One notable statistic was that this year just 55 percent of the respondents, down from 72 percent in 2010, said that records management evaluations were conducted by actual records management staff and not some other department.

We are pleased to report that a few agencies have a robust oversight function. These agencies should serve as models for the Federal records management community. Also, a number of agencies told us they are aware of shortcomings in their programs and are taking steps to address them. We look forward to following their progress in future self-assessments and through other collaborations.

SECTION THREE:

Records Management Program Records Disposition

An effective records disposition program promotes efficiency by ensuring that agencies can properly manage their records by scheduling them, ensuring their proper storage, and providing for prompt disposal of temporary records and the timely transfer of permanent records to the National Archives. 36 CFR § 1224 sets policies and establishes standards, procedures, and techniques for the disposition of all Federal records in accordance with 44 U.S.C. Chapters 21, 29, 31, and 33. This regulation requires agencies to:

- Ensure that all records are scheduled;
- Implement records schedules and transfer permanent records to the National Archives; and
- Regularly review the agency's records schedules and update them as needed.

We designed the six scored questions in this section to gather information on agencies' records scheduling activities and implementation of their schedules. We grouped the responses under three headings: scheduling records, implementing schedules, and overseeing disposition by senior-level officials.

Findings

- Agency responses involving their records scheduling, schedule implementation, and permanent records transfers have not changed significantly from previous RMSAs;
- Most Federal agencies have a functioning records disposition program, although a minority have submitted no schedules within the past 10 years;
- Schedule implementation, in terms of the systematic transfer of permanent records to NARA, continues to be inconsistent particularly in the case of electronic data; and
- Almost half (49%) of Federal agency records management programs are not proactive in overseeing records disposition by senior-level officials.

In December 2005, NARA issued Bulletin 2006-02, NARA Guidance for Implementing Section 207(e) of the E-Government Act of 2002,¹⁰ which required Federal agencies to identify and schedule their electronic records and to transfer their existing eligible permanent electronic records to NARA by September 30, 2009. In response to the bulletin, agencies increased their scheduling activities, and NARA noted an increase in schedule submissions. While agencies made significant progress towards scheduling their electronic records during this time period, the data below shows that much remains to be done.

In this section we see continuing evidence of scheduling activity in many agencies. Sixty-four percent of the agencies reported that they submitted one or more records disposition requests to NARA for approval from FY 2008 to FY 2011, and using internal NARA data we were able to verify a portion of these assertions. However, we were not able to verify every instance, and we saw inconsistencies in the way agencies track their scheduling activities. Consequently, the data we received may not provide an entirely accurate picture of agencies' scheduling activities.

A number of agencies (17%) have not submitted any schedules in more than 5 years. We saw a similar finding in the 2010 survey. We continue to be concerned that such gaps in scheduling activities do not account for organizational or regulatory changes. We also think that the percentage of agencies operating without updated schedules may be higher, as 10 percent of the respondents reported that they simply did not know when their agencies had last submitted a schedule. Finally, we continue to believe that occasional schedule submissions do not necessarily indicate an active program that fully meets its responsibilities. This is especially true for larger agencies with complex organizations and a technological emphasis that can result in a proliferation of new records-creating systems.

We note that during our focus group sessions prior to the distribution of the survey, the records officers suggested that NARA incorporate the fact that some agencies have “big bucket” schedules designed to encompass more holistically the functions of an agency program. The idea is to reduce the need to schedule each new records series or electronic system if the function has already been accounted for in a big bucket schedule. NARA agreed that agencies should not be penalized for having big bucket schedules in place, so we adjusted the answer choices for that section of the survey. According to this year's self-reported data, this factor applies to only 5 percent of the respondents, though in our verification processes we were unable to confirm that big bucket schedules were properly in place in most of these reported instances.

Implementing Schedules/Transferring Permanent Records to NARA

The trends NARA identified in past RMSAs for this topic continue. We see in the 2011 data that agencies are not properly implementing their records schedules covering permanent records, and that the problem is most prevalent in the transfer of electronic records. Of 247 respondents, 191 reported having non-electronic records eligible for transfer in FY 2010. However, only 51 percent (98 of 191) actually transferred any such records to the National Archives in the fiscal year. Of the 247 respondents, 149 reported having eligible electronic records, but an even smaller proportion—31 percent—transferred any such records.

¹⁰ NARA Bulletin 2006-02: NARA Guidance for Implementing Section 207(e) of the E-Government Act of 2002 (December 15, 2005), available via: <http://www.archives.gov/records-mgmt/bulletins/2006/2006-02.html>

Figure 5: Questions 46 and 47. Did your agency transfer any eligible permanent records to the National Archives in FY 2010?

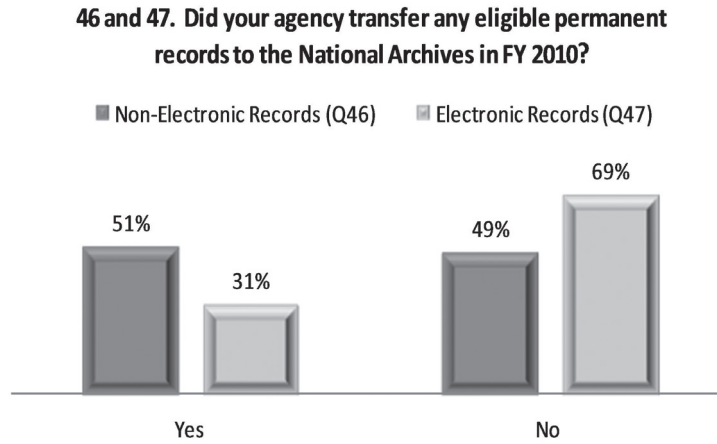
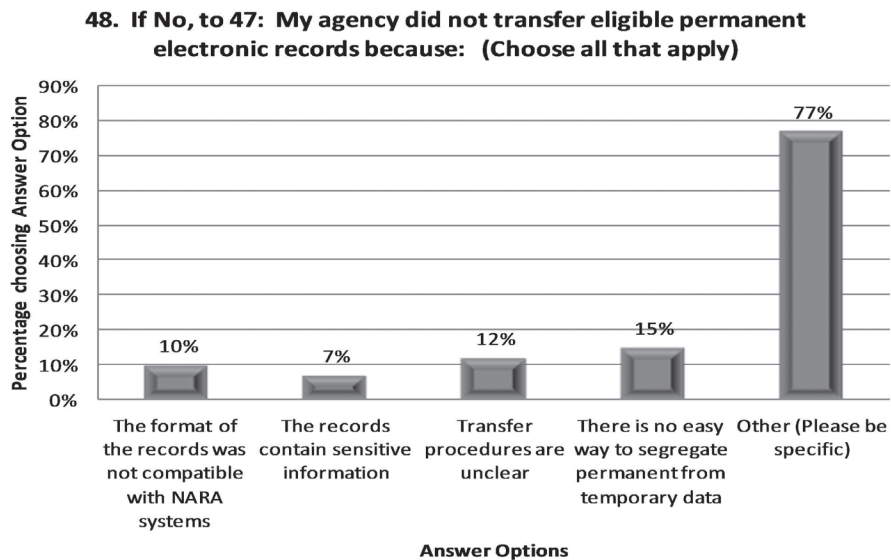


Figure 6: Questions 48. If No, to 47: My agency did not transfer eligible permanent electronic records because: (Choose all that apply)



More positively, NARA's internal data shows that effective collaboration between NARA and several Federal agencies and components produced a significant number of transfers of electronic data to the National Archives in FY 2010. For example, three agencies originated 100 of the 192 transfers of electronic data received by NARA's Electronic and Special Media Records Services Division in FY 2010.

Overseeing Disposition Practices of Senior-Level Officials

Many agency records management officers continue to report that they do not conduct exit briefings for departing senior officials on the appropriate disposition of the records under their control. Indeed, for 2011 we see a drop in the numbers (49% in 2011, down from 59% in 2010) of Federal agencies that do such briefings. This is of particular concern since only half of Federal agencies provide records management training for all their senior officials. According to 36 CFR 1230.10, agencies must take adequate measures to prevent the unlawful or accidental removal, defacing, alteration, or destruction of records and inform all employees and contractors of the provisions of this law.

Figure 7: Question 49. Does the records management program staff as a matter of standard procedure conduct exit briefings for senior officials on the appropriate disposition of the records, including e-mail, under their immediate control?



We also see from the responses in this section that one in six of the agencies that do conduct exit briefings fail to document the briefing, or they do not know if the briefings are documented. Agency comments illustrate other limitations in approach. Some observed that they provided exit briefings only “upon request” of a senior official, or “as needed,” or “when and if notified” of an impending departure. In other agencies, the records management staff did not participate in the exit briefings, which were instead conducted by legal or security officials.

Two-thirds of the respondents reported that senior officials in their agencies are required to obtain approval from records management program staff or other designated official(s) before removing personal papers and copies of records. Comments in this section, however, indicate that the arrangements take a variety of forms, some more appropriate than others. Several agencies have put specific oversight procedures in place for senior officials, and they comply fully with the regulations. The records officer for one Cabinet-level component, for example, is required to sign the exit forms of the highest-level agency officials, while officials under that level are required to submit signed forms to the records management program on exiting the agency. In one agency, the removal of personal papers or copies of records requires approval of the Office of General Counsel and the director of Privacy, Records, and Disclosure.

More commonly, though, the comments reinforced our findings from the 2009 and 2010 RMSAs that many agencies do not require specific documentation for the removal of personal papers and copies of records of high-level officials. Instead, they collect only what is required for basic personnel and security procedures.

Conclusion

A functioning records disposition program ensures that Federal agency records are identified and scheduled, that the approved schedules are properly implemented, and that permanent records are transferred on a timely basis to the National Archives. The 2011 RMSA data in these areas show little change from prior self-assessments. We continue to be concerned about these activities in Federal agencies, especially the transfer of permanent electronic records to the National Archives.

Another important subject we explored in this section is the managing of records created by senior officials. There was a slightly negative trend here, compared to the 2010 RMSA. Less than half of the agencies reported that they conduct exit briefings for senior-level officials on the appropriate disposition of the records, including e-mail, under their immediate control. Some agencies follow the regulations and conduct these exit briefings, and here again we saw some good examples of compliant practices. However, the majority of agencies are not doing enough in this area, and they are putting these important records at risk.

SECTION FOUR:

Records Management Program Electronic Records

The management of electronic records continues to challenge Federal agencies, and the issues are compounded by the ever-increasing role of technology in Federal Government business. To have an effective records management program, agency records management staff must have a baseline of knowledge about electronic records and how to manage them. Records staff do not need to be technological experts, but they have to understand certain fundamental principles and practices of managing electronic records. The responses in this section raise concerns about the education and training of some respondents in the area of electronic records management. Some comments reveal a number of misconceptions about key terms and concepts pertaining to electronic records. We see this also in the documentation submitted for our verification processes. Better education and training is essential in equipping agency staff with the skills they need to manage their electronic records.

This section contains 37 questions, 10 of which are core questions relating to the integration of records management controls into new and existing systems, preservation of electronic records in a usable format, training in electronic records management, and the preservation of electronic mail records.

*[Records management controls] is an
Agency records management requirement.*

Respondent Comment

NARA also added information-gathering questions pertaining to the use of new technologies including Electronic Record Management Systems (ERMS) and Records Management Applications (RMAs), social media, cloud computing technologies, and e-mail archiving applications. In their responses to these questions, a third of the agencies said they use an ERMS or RMA to manage electronic records; almost three-quarters said they use social media; nearly a quarter said they use cloud computing technology; and less than half claimed that they use an e-mail archiving application.

Findings

- Many respondents do not know or understand key terms and concepts pertaining to electronic records;
- Many respondents consider various aspects of electronic records management to be the purview of information technology staff;
- A significant number of agencies do not have migration procedures in place to ensure that electronic records are retrievable and usable to conduct agency business;
- Many respondents believe that media neutral records schedules eliminate the need for records management policies and procedures specific to electronic records;
- A significant number of agencies use backup tapes, which NARA does not consider a recordkeeping system, to preserve electronic documents and e-mail records;
- A third of agencies are using an ERMS or RMA to manage their electronic records;
- Over 40 percent of agencies use e-mail archiving applications to manage e-mail messages; and
- Seventy percent of agencies currently use social media.

Integration of Records Management Controls into New and Existing Systems

We asked agencies if they had established controls, through policy and procedures, to ensure the reliability, authenticity, integrity, and usability of electronic records maintained in electronic information systems. Although 62 percent of respondents answered that they have such controls, our validation work and an analysis of agency comments indicate that the actual number is surely lower. Of the agencies that reported having these controls, just two-thirds supplied documentation that supported their claims.

In their comments in this section, some respondents confused Electronic Information Systems (EIS)—defined as automated systems that contain and provide access to records and other information—with what is termed an Electronic Records Management System (ERMS)—an electronic system that manages electronic information throughout the records lifecycle. A few agencies equated the controls needed to ensure reliability, authenticity, integrity, and usability with their records schedule; one claimed to have no electronic records; and another considered a printed report to be a reliable control. One positive sign is a number of agencies reported that they have instituted internal certification processes to ensure the integration of controls into electronic records systems.

We included in this survey a set of questions pertaining to the involvement of records management staff in the design, development, and implementation of new electronic systems. This is necessary to ensure the inclusion of recordkeeping functionality in new systems. It is also mandated in Federal regulations. We had a similar section in the 2010 RMSA, and the responses have not changed significantly from last year. A little over 50 percent answered that records management functionality is incorporated into the design, development, and implementation of their new electronic systems. However, as noted above agency comments show a lack of knowledge regarding basic terms in some cases; for example, some agency responses to this question pertained not to Electronic Information Systems but instead to Electronic Records Management Systems.

Similarly, the reported frequency with which records management staff participate in the design, development, and implementation of new electronic systems is relatively unchanged from the 2010 data. Only 16 percent of Federal agencies answered that they always participate in this process, and another 16 percent said they do so “most of the time.” Twenty-six percent said they are involved “occasionally,” and 43 percent said they are rarely or never involved. Comments indicate that many agency records officers continue to make an effort to be included in this process.

Preservation of Electronic Records in a Usable Format

Last year, 68 percent of the agencies responded that they had established policies and procedures requiring that electronic records are preserved in a usable format. For 2011 we rephrased the question to explore whether agencies have procedures to enable the migration of records and associated metadata to new storage media or formats so that records are retrievable and usable. Only 40 percent said that they have migration procedures in place, and of that group we could only verify 60 percent of these assertions based on the documentation we received in the validation process. Several agencies stated that their migration strategies are specific to each agency system. A number of agencies that answered in the negative said they are currently working on developing migration plans. Twenty percent said they do not know if migration procedures exist, with some adding that they consider this to be the sole responsibility of IT departments. Several referenced their backup procedures instead of migration policies; however, according to NARA guidance and general industry best practices, backups are not a substitution for a migration policy, nor do they suffice as a preservation tool.

Agencies continue to work on scheduling their electronic records. Almost 80 percent of the agencies asserted that they maintain a list of their electronic information systems, and almost three-quarters of those systems are covered by a NARA-approved records schedule. Agency documents submitted for our verification processes support 60 percent of those who answered affirmatively here. A number of agencies commented that they are continuing to work with NARA appraisal archivists to schedule systems that do not yet have approved dispositions.

Electronic Records Management Training

This section contained two questions on electronic records training. Seventy percent reported that they provide training on the retention and management of records created and maintained in electronic form. The majority said that all employees receive this training, though 14 percent answered that only records liaison officers were trained. Similarly, a higher percentage (nearly 70%) said they provide training specifically on the retention and management of e-mail records. Of those agencies that provide e-mail training, a majority said it was mandatory for all staff, including contractors and senior officials.

Although these percentages are good, the prevalence of misconceptions we saw in agency comments raises doubts about the knowledge of respondents in the area of electronic records and, as a consequence, doubts about the quality of the training they provide to their colleagues. Over 30 percent of agencies that said they provide this training scored in the high risk category.

Preservation of Electronic Mail Records

We asked several questions about the preservation of electronic mail records. We asked if agencies had policies and procedures for e-mail records that have a retention period longer than 180 days. Sixty-seven percent answered that they have policies and procedures covering these records, but we could only verify about two-thirds of these responses from the documentation they submitted for our validation work. One agency made the questionable claim that it does not have any retention requirements over 180 days and therefore has no need of such a policy.

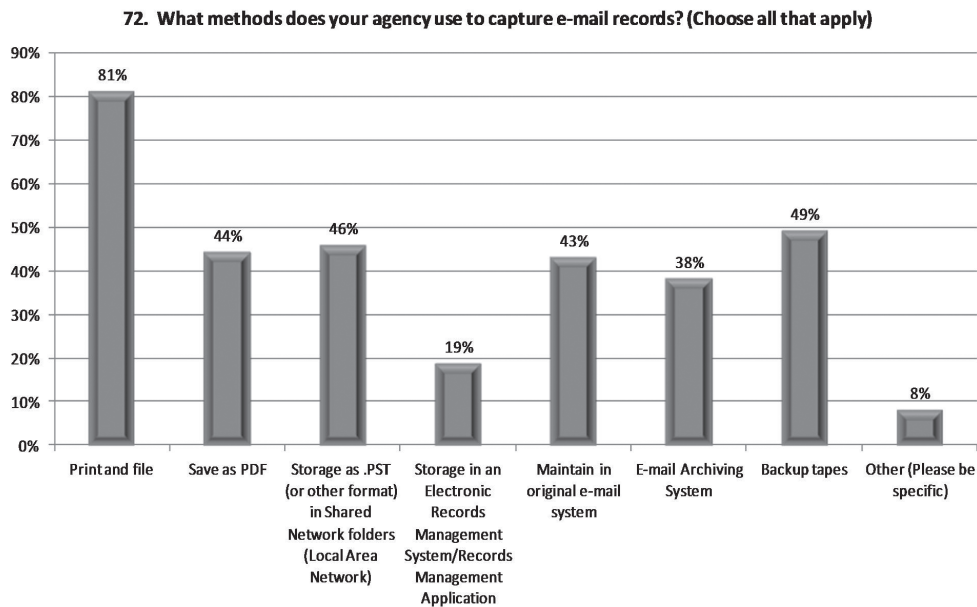
Our CIO captures every email, whether or not it's a record, however, we have no way of retrieving any of them.

Respondent comment

We asked agencies to select, from a list, all the means they use to ensure preservation of e-mail records. Almost three-quarters selected policies and procedures, and 63 percent chose training. Other choices included recordkeeping requirements (57%), staff briefings (41%), e-mail reminders (29%), and office visits (28%). Write-in responses included annual reminders, brochures, backup tapes, meetings and word of mouth, guidance posted on the agency intranet, and the practice of saving all messages. Sixty-eight percent of agencies use two or more of these means to manage their e-mail records.

Agencies use a variety of methods to capture e-mail records. According to the survey responses, over 80 percent of agencies continue to print and file e-mail messages, and almost 50 percent use backup tapes. Only 19 percent (46 of 247) capture record e-mail messages in an ERMS or RMA.

Figure 8: Question 72. What methods does your agency use to capture e-mail records? (Choose all that apply)



Many agencies save their e-mails to a PDF file (44%), store them as a PST or other format in a shared network folder (46%), or maintain them in the original e-mail system (43%). Others store e-mail records offline on thumb drives and CD/DVDs. One cabinet-level agency stated that it does not have a recordkeeping system for e-mail records at all.

The next set of questions concerned the systematic audit or review of compliance with an agency's e-mail preservation policies. We first asked about this in the 2010 RMSA, and the responses have not changed significantly. The proportion of agencies that reported that they audit or review staff compliance with e-mail preservation policies has risen slightly from last year (from 33% in 2010 to 40% in 2011); however, this increase may be because the percentage of those who answered "do not know" has gone down by 6 percent. The percentage of agencies that said they do not monitor compliance has remained stable at around 55 percent. However, the frequency with which agencies conduct these audit or review activities has improved, according to the self-reporting in the survey. The number of agencies that said they do some monitoring activity every 6 months has quadrupled, from 6 percent to 23 percent.

Agency Use of Electronic Records Management Systems/ Records Management Applications

Approximately one third of the respondents reported that their agencies use an Electronic Records Management System or a Records Management Application. Almost 40 percent of this group said their ERMS/RMA is a pilot project. Of the agencies that said they use an ERMS/RMA, slightly over 40 percent claimed to use it agency-wide; almost 40 percent said they use it in selected offices or component units; and the remaining 20 percent said their ERMS/RMA was a pilot project but did not indicate the scope.

Sixty-one percent of these systems have automatic capture/classification capability, according to the agencies that reported having them. Among the agencies that use an ERMS/RMA, 85 percent said they use it to manage electronic documents; 59 percent said they use it for e-mail; and 35 percent said they use it to manage records not in the ERMS/RMA. Another 13 percent reported that they use their ERMS/RMA for scanned records, forms, and other documents.

Among the agencies that do not use an ERMS or RMA, 38 percent stated that they are in the process of developing one, and more than 50 percent said they plan to deploy it over the next 3 years. Others expressed that they are uncertain as to when it might be deployed mainly due to funding issues.

Agency Use of Web 2.0 and Social Media

According to the responses in this section, 70 percent of agencies currently use social media, such as Facebook, Twitter, and blogs. In FY 2011 NARA issued a bulletin¹¹ advising agencies to incorporate records management guidance in social media policies and procedures and to ensure the scheduling and preservation of social media records. However, just 50 percent of these agencies said they have developed policies and procedures for capturing and managing any records created on social media

¹¹ NARA Bulletin 2011-02: Guidance on Managing Records in Web 2.0/Social Media Platforms (October 20, 2010), available via <http://www.archives.gov/records-mgmt/bulletins/2011/2011-02.html>

platforms, though many agencies assert that policies are currently being developed. One stated that while their agency employs social media in some way, no records are created as they do this.

Several agencies commented that their schedules are media neutral, indicating that they do not see the need for policies and procedures specific to their social media activities. This goes against NARA guidance and records management best practices, and the regulatory requirements to ensure the preservation of content and context in Federal record material regardless of format. Several acknowledged that official records created on social media outlets are not being captured. One agency commented that records considered permanent are retained in hard-copy, which may indicate an expansion of print and file practices to records on social media.

There were some good examples of progress in this area. One agency described an effective strategy they initiated to monitor records creation in their use of social media, an often difficult task considering how much is duplicative or posted simply for reference. The agency convened an internal working group, including records management staff, to monitor their social media activity and develop a policy if, and when, records are created. Several other agencies said they have set up similar initiatives, also with records management participation, to determine gaps in policies. Others stated that records management staff monitor agency use of social media.

Agency Use of Cloud Computing Technologies

Federal agencies are using cloud computing to varying degrees in their official business, and they are creating records in this environment. NARA guidance¹² states that these records, just as any other records subject to Federal records management regulation, must be managed according to approved dispositions.

Nearly 25 percent of the respondent agencies reported using cloud computing technologies, and another 40 percent said they are currently exploring its use. Of the agencies that use cloud computing, a third said they have policies and procedures that address managing records in a cloud environment, though two-thirds said they do not. Two agencies said they do not know if they have them. Several commented that they are in the process of developing appropriate guidance, but others said they don't need to do this. One said that existing agency records management policy applies to all records, regardless of media, and another stated that the policy is simply whatever applies to any third party responsible for maintaining agency records. Several agencies stated that though they do utilize cloud computing, they do not maintain any records created or stored in cloud technologies.

Agency Use of E-Mail Archiving Applications

Forty-one percent of the agencies reported that they use an e-mail archiving application, and a third of that group said they use it for official recordkeeping of electronic mail messages. However, these percentages may not be a true representation of agency use. Comments by a number of respondents indicate that they do not understand what an e-mail archiving application is, and some confuse

¹² NARA Bulletin 2010-05: Guidance on Managing Records in Cloud Computing Environments (September 8, 2010), available via <http://www.archives.gov/records-mgmt/bulletins/2010/2010-05.html>

e-mail archiving applications with an RMA or ERMS. For verification purposes in this section we collected documentation on agency e-mail archiving policies, and much of what we received does not support agency assertions that they have compliant policies in place. This also suggests that the number of agencies that use an e-mail archiving application may be lower than reported. Some agencies wrote that they are using, in whole or in part, such applications as an interim step until they implement an ERMS.

Conclusion

The management of electronic records, particularly those created in electronic mail systems, remains a critical issue for Federal records management. Agencies continue to struggle with the technological aspects of preserving records created and maintained in electronic format. We encountered a number of misconceptions in the agency comments in this section, and the implication is that some respondents do not understand basic terms and concepts pertaining to electronic records. We saw further evidence of this in the documentation submitted by the agencies for validation purposes. Knowledge gaps of this nature contribute to the implementation of poor recordkeeping practices.

Agency records management staff require better education and training in the management of electronic records. They need these skills to manage Federal records more effectively, and they need to be able to communicate with information technology staff. Inevitably, Federal agencies will move forward in the use of new technologies, and it will take some time to develop policies and procedures to manage records created and maintained in these new formats. Agencies need the tools to monitor and assess progress in this crucial area.

SECTION FIVE:

Validation

NARA conducted additional validation of agency responses this year, in an effort to confirm agencies' self-reported data. We subjected 12 questions to this process. If the respondent answered "yes" to a designated question, we requested documentation or information to support their answer. If the respondent answered "no" or "do not know," we took no further action.

In all we contacted 41 percent of respondents regarding some aspect of our verification processes. In some cases this communication dealt with specific technical issues, including the inability to open electronic files we received or agency intranet links we were unable to access. However, the majority of our follow-up contacts were to address issues that arose during our review of materials. We reached out to agencies that did not provide any documentation, provided incomplete documentation, or provided documentation that did not appear relevant to our requests.

Findings

- The quality of documents ranged from excellent examples of directives, policies, procedures, and inspection reports to materials that were out of date, unclear, and inaccurate;
- The majority of respondents provided materials that did not support their responses to one or more questions in the survey;
- Some agencies appear to have the impression that their records schedule is the only documentation they need to manage their program; and
- A number of agencies appeared to have responded to the questionnaire without consulting other parts of the organization, in particular their information technology departments.

The FY 2011 RMSA is the first of these annual surveys to include comprehensive validation. We found that we were unable to verify one or more responses in a significant percentage of the surveys. Because of this surprisingly high tally, NARA determined that the FY 2011 validation would serve as a pilot. We are taking lessons learned here to prepare for the next iteration of the RMSA. In addition, in advance of future surveys NARA will be providing even more detailed instructions on how agencies should provide validation documentation. Our goal is to resolve some of the early administrative issues and have a streamlined verification process that will allow NARA to accurately assess the documentation we receive. We also want to ensure that agencies are fully aware of the importance of the documentation they submit and our verification work to the overall value of the survey.

APPENDIX I:

Recommendations for Executive Action

The focus of the following recommendations is to build the capacity of the Government's records management function to include a framework for governance, organization, and performance through collaborative action among NARA and Federal agencies.

Resources Management

- Resource planning should be performance and compliance/requirements driven for establishing and implementing an agency's records management function. Planning recommendations should be a key part of future activities;
- NARA should revise 36 CFR 1220.34 to require that each agency create a multi-year plan detailing how they will achieve compliance with records management policies and regulations; establish performance goals and benchmarks for evaluating success; and set specific resourcing commitments, commensurate with the size of the agency, that they need to accomplish these objectives. These plans must be included with agencies' annual budget submissions to OMB;
- NARA and agencies should explore, test, and if effective, deploy automated solutions to manage records and information throughout the Federal Government; and
- Under the direction of their records management officials, agencies should establish an agency records council that assists in the management of agency records. These councils should include agency staff from program and administrative support functions responsible for information management within their areas of responsibility, and they must all have records management duties—which they fulfill through their participation in these collaborations—built into their performance metrics.

Records Management Program—Activities

- Agencies not currently evaluating their records management program should do so;
- Agencies not currently conducting records inventories should do so in order to meet the requirement to periodically update their records schedules; and
- Agencies should review and develop file plans on an annual basis.

Electronic Records

- Agencies must ensure compliance with the regulations in 36 CFR Part 1236 including that:
 - official e-mail messages are preserved in appropriate recordkeeping systems;

- records management functionalities are integrated into all new electronic systems; and
- records are maintained in usable formats through their entire lifecycle.
- The Federal Records Council¹³ and the Chief Information Officers (CIO) Council¹⁴ should partner to raise awareness of the importance of agency records management and IT staffs working cooperatively to integrate records management functionalities into electronic systems, and identify and develop IT solutions to electronic records management problems;
- NARA guidance and training should include more detailed and practical information regarding best practices for implementation strategies;
- Agencies must recognize that electronic recordkeeping is a joint responsibility of records management and IT staff;
- Per existing guidance including OMB Circular A-130, “Management of Federal Information Resources,” agencies should strive to better incorporate records management and archival functions into the design, development, and implementation of information systems;
- NARA should work with OMB to ensure records management is included in the design of information systems and built into the IT governance process; and
- Agencies must require staff with records management responsibilities to attend basic electronic records training on an annual basis.

Records Disposition

- Agencies should ensure that all records are scheduled in accordance with 36 CFR 1224;
- Agencies must continue working towards the goal of fully scheduling their electronic information systems;
- Agency records officers must actively collaborate with program management and IT staff and with NARA experts to facilitate the transfer of permanently valuable electronic records to the National Archives; and
- Federal agency records management programs must oversee records disposition by senior-level officials.

Vital Records

- Agencies must identify their vital records;
- Agencies must develop partnerships between their records management and emergency management programs;

¹³ The Federal Records Council is an interagency advisory group consisting of Cabinet-level records officers and other information management professionals that provides advice and support to NARA and OMB on Federal records and information management issues.

¹⁴ The Chief Information Officers (CIO) Council serves as the principal interagency forum for improving practices in the design, modernization, use, sharing, and performance of Federal Government agency information resources. The Council’s role includes developing recommendations for information technology management policies, procedures, and standards; identifying opportunities to share information resources; and assessing and addressing the needs of the Federal Government’s IT workforce.

- Agencies must conduct an annual review of their vital records program; and
- Agencies must provide vital records training to their records liaisons as well as emergency management staff.

Training

- NARA should develop detailed training standards that address records management training via multiple delivery modes;
- Agencies should ensure that records management training for employees at all levels in their organization is mandatory, delivered at least annually, and contains practical tools to implement records schedules and ensure good recordkeeping practices;
- Agencies should develop valid metrics for their records management training, regardless of the delivery system they use, to determine the number of employees who complete the training;
- Agencies should develop viable methods to evaluate the effectiveness of their training. This can include follow-up site visits and inspections/audits;
- Agencies should ensure they have sufficient numbers of trained records management staff with full-time records management responsibilities to develop, oversee, and audit their training programs; and
- Agencies should ensure that senior-level officials receive records management training appropriate to their position.

Policy

- The RMSAs are designed to identify areas of weakness in specific agency programs and broader concerns in Federal records management. Agency inspections, whether they follow RMSA results or other impetus, can add to these data points. NARA in coordination with agencies should use this work to determine whether the current process of how records are defined, managed, and preserved needs to be revised to be more reflective of the current business environment in agencies.

Oversight and Compliance

- Agencies must develop verifiable performance measures for major activities of their records management programs.

APPENDIX II:

Non-Respondent Agencies to 2011 Records Management Self-Assessment

Advisory Council on Historic Preservation
American Battle Monuments Commission
American Institute in Taiwan
Appalachian Regional Commission
Committee for the Purchase from People Who Are Blind/AbilityOne
Delaware River Basin Commission
Department of Agriculture/Foreign Agricultural Service
Department of Commerce
 International Trade Administration
 Minority Business Development Agency
Department of Defense/Personnel and Readiness Command
Department of Labor
 Office of Management Support Services
 Veterans Employment and Training Service
 Bureau of International Labor Affairs
 Job Corps
Department of the Treasury/Financial Crimes Enforcement Network
Department of Transportation/St. Lawrence Seaway Development Corporation
Department of Veterans Affairs
 Veterans Benefit Administration
 National Cemetery Administration
Federal Deposit Insurance Corporation
Federal Judicial Center
Federal Labor Relations Authority
Federal Mediation and Conciliation Service
Harry S. Truman Scholarship Foundation
James Madison Memorial Fellowship Foundation
Japan-U.S. Friendship Commission
Nuclear Waste Technical Review Board
Office of Navajo and Hopi Relocation
U.S. Holocaust Memorial Council and Museum
United States Institute of Peace

APPENDIX III:

2011 Records Management Self-Assessment Questionnaire

National Archives and Records Administration (NARA)

FY 2011 Records Management Self-Assessment

NOTE: This version of the questionnaire is provided with charts indicating percentages and response counts per answer options based on the number of respondents. The online version provided a comment box after each question. This box has been removed in this representation to save space.

Records Management Program—Activities

1. Has your agency assigned records management responsibility to a person with appropriate authority within the agency to coordinate and oversee implementation of the agency's comprehensive records and information management program? (36 CFR 1220.34(a))

Answer Options	Response Percent	Response Count
Yes	96%	236
No	2%	6
Do not know	2%	5
Number of respondents answering this question		247
Core question		

2. If Yes: Please provide the name of that individual and their office.

Information management includes responsibilities over one or many of the following areas: Privacy Act, Freedom of Information Act (FOIA), web and social media programs, and/or information security.

3. Is this individual responsible for information management as well as records management in your agency?

Answer Options	Response Percent	Response Count
Yes	43%	101
No	57%	133
Do not know	<1%	1
Number of respondents answering this question		235

4. Does this individual also have primary responsibility for carrying out your agency's records management program? This individual is often called the Records Officer, though the titles may vary. (36 CFR 1220.34(b))

Answer Options	Response Percent	Response Count
Yes	91%	213
No	9%	22
Do not know	0%	0
Number of respondents answering this question		235

5. If No: Please provide the name and title of the person with operational responsibility for carrying out your agency's records management program.

6. What delegated authority does the person with operational authority for your agency's records management program have?

Answer Options	Response Percent	Response Count
Coordinate and oversee implementation	62%	21
Operational responsibility only	15%	5
No delegated authority	15%	5
Do not know	2%	1
Other (Please be specific)	6%	2
Number of respondents answering this question		34

7. Is the operational responsibility for your agency's records management program a:

Answer Options	Response Percent	Response Count
Full-time duty	55%	136
Collateral duty	41%	101
Other (Please be specific)	4%	10
Number of respondents answering this question		247

8a. How many FTEs (Full-Time Equivalents) in your agency's records management program office are assigned records management responsibilities?

NOTE: Please combine percentages of time to equal a full-time equivalent employee where necessary. For example, if you have 2 full-time employees, each of whom perform records management work 50 percent of the time, they would equal 1 FTE.

Number of Agency FTEs

Answer Options	Response Percent	Response Count
None	4%	10
Greater than 0 but less than 1	12%	30
1	32%	78
Greater than 1 but less than 10	43%	105
Between 10 and 20	4%	9
Between 21 and 30	1%	2
30 or more	5%	12
Unknown	<1%	1
Number of respondents answering this question		247

8b. How many FTEs (Full-Time Equivalents) in your agency's records management program office are assigned records management responsibilities?

NOTE: Please combine percentages of time to equal a full-time equivalent employee where necessary. For example, if you have 2 full-time employees, each of whom perform records management work 50 percent of the time, they would equal 1 FTE.

Number of Contract FTEs

Answer Options	Response Percent	Response Count
None	66%	163
Greater than 0 but less than 1	3%	7
1	10%	25
Greater than 1 but less than 10	17%	42
Between 10 and 20	1%	3
Between 21 and 30	0%	0
30 or more	2%	6
Unknown	<1%	1
Number of respondents answering this question		247

9. Does your agency have a records management directive(s)? (36 CFR 1220.34(c))		
Answer Options	Response Percent	Response Count
Yes	91%	225
No	7%	17
Do not know	2%	5
Number of respondents answering this question		247
Core question		

10. If Yes: When was your agency's directive(s) last updated?		
Answer Options	Response Percent	Response Count
FY 2010 - present	38%	86
FY 2007 - 2009	30%	67
FY 2004 - 2006	13%	30
FY 2003 or earlier	17%	38
Do not know	2%	4
Number of respondents answering this question		225
Core question		

10a. Validation. Please send a copy of your most recent records management directive to rmsselfassessment@nara.gov . If the directive is on your agency's public website, please e-mail the link to rmsselfassessment@nara.gov		
	Percent to total documentation submitted	Validation count
Answers verified by documentation received	83%	187
Unable to verify answers by documentation received	4%	10
Documentation incomplete or not submitted	12%	28
Total required to submit documentation		225

A program area is responsible for mission-related activities. An administrative area is responsible for activities not specific to the mission of the agency.

11. Does your agency have a network of designated employees within each program and administrative area who are <u>assigned</u> records management responsibilities? These individuals are often called Records Liaison Officers (RLOs) though their titles may vary. (36 CFR 1220.34d)		
Answer Options	Response Percent	Response Count
Yes	83%	205
No	16%	40
Do not know	1%	2
Number of respondents answering this question		247
Core question		

12a. How many FTEs (Full-Time Equivalents) in your agency's program and administrative offices are assigned records management responsibilities?		
NOTE: Please combine percentages of time to equal a full-time equivalent employee where necessary. For example, if you have 2 full-time employees, each of whom perform records management work 50 percent of the time, they would equal 1 FTE.		
Number of Agency FTEs		
Answer Options	Response Percent	Response Count
None	5%	10
Greater than 0 but less than 1	5%	9
1	12%	23
Greater than 1 but less than 10	39%	76
Between 10 and 20	17%	33
Between 21 and 30	4%	11
30 or more	14%	35
Number of respondents answering this question		197

12b. How many FTEs (Full-Time Equivalents) in your agency’s program and administrative offices are assigned records management responsibilities?

NOTE: Please combine percentages of time to equal a full-time equivalent employee where necessary. For example, if you have 2 full-time employees, each of whom perform records management work 50 percent of the time, they would equal 1 FTE.

Number of Contract FTEs		
Answer Options	Response Percent	Response Count
None	72%	115
Greater than 0 but less than 1	4%	6
1	4%	6
Greater than 1 but less than 10	11%	17
Between 10 and 20	4%	6
Between 21 and 30	0%	0
30 or more	5%	8
Unknown	<1%	1
Number of respondents answering this question		159

13. What records management duties are assigned to these designated employees? (Choose all that apply)

Answer Options	Response Percent	Response Count
Develop file plans	63%	156
Inventory records in all formats	62%	153
Draft SF-115s for unscheduled records in all formats	36%	88
Establish electronic and paper file systems	59%	145
Provide training and briefings to program staff	46%	113
Retire inactive records	73%	180
Sign SF-258s to transfer permanent records to the National Archives	21%	51
Monitor records management compliance within their program or administrative area	70%	173
Other (Please be specific)	13%	33
Number of respondents answering this question		247

For the following questions, formal records management training is the communication of standardized information that improves the records management knowledge, skills, and/or attitudes of agency employees. Training can be either classroom or distance-based, but it must:

- Be regular (occurring more than just once)
- Be repeatable and formal (all instructors must provide the same message, not in an ad hoc way), and
- Communicate the agency’s vision of records management.

14. Has your agency developed agency-specific, formal records management training for employees assigned records management responsibilities? (36 CFR 1220.34(f))

Answer Options	Response Percent	Response Count
Yes	77%	158
No	23%	46
Do not know	<0%	1
Number of respondents answering this question		205
Core question		

15. How many employees assigned records management responsibilities did your agency train during FY 2010?

Answer Options	Response Percent	Response Count
0 and less than 1	6%	10
1 to 10	18%	28
11 to 30	16%	25
31 to 60	11%	18
61 to 99	9%	15
100 to 300	16%	26
Over 300 less than 1,000	9%	15
Over 1,000	5%	8
Unknown or undeterminable by response	8%	13
Number of respondents answering this question		158

16. Has your agency developed agency-specific formal training for all agency employees? (36 CFR 1220.34(f))

Answer Options	Response Percent	Response Count
Yes	74%	183
No	26%	64
Do not know		
Number of respondents answering this question		247
Core question		

17. If Yes: How often do agency employees receive records management training?

Answer Options	Response Percent	Response Count
Annually	62%	113
Every 2 years	4%	8
Only when they are newly hired	7%	13
Only when they request it	7%	12
Other (Please be specific)	20%	37
Number of respondents answering this question		183

18. How many employees attended your agency's records management training during FY 2010?

Answer Options	Response Percent	Response Count
0 and less than 1	7%	12
1 to 10	4%	7
11 to 30	7%	12
31 to 60	8%	15
61 to 99	5%	10
100 to 300	18%	33
Over 300 less than 1,000	11%	21
Over 1,000	22%	40
Unknown or undeterminable by response	18%	33
Number of respondents answering this question		183

Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions. (GRS 23, 5a)

19. Does your agency, as a matter of standard procedure, provide training to all senior officials and appointed officials, including those incoming and newly promoted, on the importance of appropriately managing records under their immediate control? (36 CFR 1220.34(f))		
Answer Options	Response Percent	Response Count
Yes	50%	124
No	23%	58
Some, but not all, officials receive records management training	25%	62
Do not know	1%	3
Number of respondents answering this question		247
Core question		

20. If No: Please indicate why all senior officials in your agency do not receive records management training.

21. If Yes: How do the senior officials in your agency receive records management training? (Choose all that apply)		
Answer Options	Response Percent to total answering Yes or Some to Q19	Response Count
Online briefings	47%	87
Face-to-face briefings	87%	162
E-mail messages	41%	77
Information posted on agency's internal website	61%	113
Other (Please be specific)	20%	38
Number of respondents answering this question		186

22. What topics are covered in briefings to senior officials? (Choose all that apply)		
Answer Options	Response Percent to total answering Yes or Some to Q19	Response Count
Identification of Federal records	96%	179
Government ownership of Federal records	92%	172
Government accountability	92%	171
Legal requirements for Federal records	95%	177
E-mail records	92%	171
Alienation of records	61%	113
Personal papers	90%	167
Other (Please be specific)	16%	30
Number of respondents answering this question		186

23. Who in your agency <u>directly</u> trains senior officials and appointed officials, including those incoming and newly promoted, on the importance of appropriately managing records under their immediate control? (Choose all that apply)		
Answer Options	Response Percent to total answering Yes or Some to Q19	Response Count
Records management program staff	84%	156
Office of General Counsel staff	37%	69
Administrative support staff	19%	35
Information technology staff	14%	26
Other (Please be specific)	19%	35
Number of respondents answering this question		186

Records Management Program—Oversight and Compliance

Agency records management programs must provide for effective controls over the creation, maintenance, and use of records in the conduct of current business. (36 CFR 1220.30(c)(1))

24. Does your agency's records management program have established metrics to assess the effectiveness of the program?		
Answer Options	Response Percent	Response Count
Yes	32%	79
No	40%	100
Currently under development	25%	61
Do not know	3%	7
Number of respondents answering this question		247
Core question		

24a. Validation. If Yes: Please send a copy of your agency's records management performance metrics to rmsselfassessment@nara.gov		
	Percent to total documentation submitted	Validation count
Answers verified by documentation received	66%	52
Unable to verify answers by documentation received	19%	15
Documentation incomplete or not submitted	15%	12
Total required to submit documentation		79

25. How does your agency ensure that its employees and contractors who are assigned records management responsibilities – either in the headquarters records management program office or in program and administrative areas - comply with the agency's records management policies and procedures? (36 CFR 1220.34(i) and 36 CFR 1222.32(a)(2)) (Choose all that apply)		
Answer Options	Response Percent	Response Count
Audits and/or inspections	48%	119
Program reviews	40%	99
On-site visits	52%	128
Required submission of quarterly and/or annual reports	13%	33
Other (Please be specific)	37%	91
Number of respondents answering this question		247

26. How does your agency assess the effectiveness of the records management training it provides to its employees and contractors? (Choose all that apply)

Answer Options	Response Percent	Response Count
Course evaluations	36%	90
Participant interviews	23%	57
Inspections and/or audits	34%	83
Feedback from supervisors and managers	46%	114
Performance evaluations	14%	34
My agency does not have a records management training program	13%	32
Other (Please be specific)	22%	55
Number of respondents answering this question		247

27. Does your agency's records management program have policies and procedures that instruct staff on how your agency's permanent records in all formats must be managed and stored? (36 CFR 1222.34(e))

Answer Options	Response Percent	Response Count
Yes	78%	193
No	20%	50
Do not know	2%	4
Number of respondents answering this question		247

27a. Validation. If Yes: send a copy of your agency's policies and procedures for managing and storing permanent records to rmselfassessment@nara.gov.

	Percent to total documentation submitted	Validation count
Answers verified by documentation received	78%	150
Unable to verify answers by documentation received	5%	9
Documentation incomplete or not submitted	18%	34
Total required to submit documentation		193

28. Has your agency's records management program established controls to ensure that all eligible permanent records in all media that are created by your agency are transferred to NARA according to your agency's approved records schedules? (36 CFR 1222.26(e))

Answer Options	Response Percent	Response Count
Yes	54%	134
No	43%	105
Do not know	3%	8
Number of respondents answering this question		247
Core question		

29. If Yes: Please describe the controls your agency's records management program has established to ensure that all eligible permanent records in all media are transferred to NARA according to your agency's records schedules.

30. Has your agency established controls to ensure that Federal records are not destroyed before the end of their retention period? (36 CFR 1222.26(e))		
Answer Options	Response Percent	Response Count
Yes	68%	169
No	28%	69
Do not know	4%	9
Number of respondents answering this question		247
Core question		

31. If Yes: Please describe the controls your agency has implemented to ensure that Federal records are not destroyed before the end of their retention period.

An evaluation is an 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 practices, policies, and procedures, and follow-up activities, including reporting on and implementing the recommendations. Evaluations may be comprehensive (agency-wide) or specific to a program area or organizational unit. (36 CFR 1220.18)

A program area is responsible for mission-related activities. An administrative area is responsible for activities not specific to the mission of the agency. (36 CFR 1220.34(d))

Records management program staff includes employees and/or contract staff with full-time records management responsibilities.

32. Does your agency conduct evaluations of the records management practices of its program and administrative areas? (36 CFR 1220.34(j))		
Answer Options	Response Percent	Response Count
Yes	71%	176
No	26%	65
Do not know	2%	6
Number of respondents answering this question		247
Core question		

33. If Yes: When was the most recent records management evaluation/inspection conducted by your agency?		
Answer Options	Response Percent	Response Count
FY 2011	45%	79
FY 2010	26%	46
FY 2009	10%	17
Earlier than FY 2009	19%	34
Number of respondents answering this question		176
Core question		

34. What program or administrative area was last evaluated/inspected?

35. Who conducted the evaluation?		
Answer Options	Response Percent	Response Count
RM staff	55%	97
Contractors or Consultants	9%	15
Inspector General	15%	27
Other (Please be specific)	21%	37
Number of respondents answering this question		176

Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions. (GRS 23, 5a)

36. Were senior officials responsible for the evaluated office or program briefed on the findings of the records management evaluation/inspection?		
Answer Options	Response Percent	Response Count
Yes	87%	153
No	11%	20
Do not know	2%	3
Number of respondents answering this question		176
Special Focus		

37. Was a formal report prepared after the evaluation/inspection was completed?		
Answer Options	Response Percent	Response Count
Yes	64%	113
No	30%	53
Do not know	6%	10
Number of respondents answering this question		176
Special Focus		

37a. Validation. If Yes: Please send a copy of your most recent records management program evaluation/inspection report to rmsselfassessment@nara.gov. NOTE: Report can be redacted.

	Percent to total documentation submitted	Validation count
Answers verified by documentation received	61%	69
Unable to verify answers by documentation received	21%	24
Documentation incomplete or not submitted	18%	20
Total required to submit documentation		113

38. What follow-up actions did your agency take to ensure that the program or administrative area implemented the recommendations from the evaluation/inspection? (Choose all that apply)		
Answer Options	Response Percent	Response Count
Established reporting requirements	30%	53
Conducted regularly scheduled site visits	0%	52
Established records management metrics	18%	31
Established training requirements	44%	78
Other (Please be specific)	50%	88
Number of respondents answering this question		176

Vital records are records needed to meet operational responsibilities under national security emergencies or other emergency conditions (emergency operating records) or to protect the legal and financial rights of the Government and those affected by Government activities (legal and financial rights records). (36 CFR 1223.2)

A program area is responsible for mission-related activities. An administrative area is responsible for activities not specific to the mission of the agency. (36 CFR 1220.34(d))

39. Has your agency identified the vital records of all its program and administrative areas? (36 CFR 1223.16)		
Answer Options	Response Percent	Response Count
Yes	72%	177
No	20%	50
Do not know	8%	20
Number of respondents answering this question		247
Core question		

40. Does your agency's records management program conduct the vital records inventory for your agency?		
Answer Options	Response Percent	Response Count
Yes	56%	138
No	41%	102
Do not know	3%	7
Number of respondents answering this question		247

41. If No: Who in your agency conducts the vital records inventory?

42. How often does your agency update its vital records inventory? (36 CFR 1223.14)		
Answer Options	Response Percent	Response Count
Annually	44%	108
Every 1-3 years	18%	44
Every 4-6 years	7%	18
Never	9%	23
Do not know	22%	54
Number of respondents answering this question		247
Core question		

43. Is the records management program represented on the agency's Continuity of Operations (COOP) program team?		
Answer Options	Response Percent	Response Count
Yes	70%	173
No	23%	56
Do not know	7%	18
Number of respondents answering this question		247
Special Focus		

44. Is your vital records plan part of the Continuity of Operations (COOP) plan?		
Answer Options	Response Percent	Response Count
Yes	81%	201
No	11%	26
Do not know	8%	20
Number of respondents answering this question		247

Records Management Program—Records Disposition

45. When was the last time your agency submitted a records schedule (e.g., SF-115*) that was accepted (registered and assigned a Job Number) by NARA? (36 CFR 1224.10(c) and 36 CFR 1225.12(i))		
Answer Options	Response Percent	Response Count
FY 2010 – 2011	48%	119
FY 2008 – 2009	16%	39
FY 2006 – 2007	4%	9
FY 2005 or earlier	17%	42
My agency has big bucket schedules covering all records that were approved by NARA in FY 2005 or later	5%	13
Do not know	10%	25
Number of respondents to this question		247
<i>*Standard Form 115: Request for Records Disposition Authority</i>		
Special Focus		

45a. Validation. Please provide the Job Number of the most recent SF-115 submitted to, and registered by, NARA. This number can be found on the monthly status report sent to your agency's records officer by your NARA appraisal archivist.		
	Percent to total documentation submitted	Validation count
Answers verified by documentation received	72%	160
Unable to verify answers by documentation received	27%	60
Documentation incomplete or not submitted	1%	2
Did not have to submit documentation due to response to Q45		25
Total required to submit documentation		222

46. As required by your agency's NARA-approved schedule, did your agency transfer any eligible permanent <u>non-electronic records</u> to the National Archives via a SF-258* in FY 2010? (36 CFR 1235.12)		
Answer Options	Response Percent	Response Count
Yes	40%	98
No	38%	93
None of my agency's permanent non-electronic records were eligible to be transferred in FY 2010	15%	36
All my agency's eligible permanent non-electronic records are under a records hold or freeze	2%	6
Other (Please be specific)	6%	14
Number of respondents to this question		247
<i>*Standard Form 258: Agreement to Transfer Records to the National Archives of the United States</i>		
Core question		

46a. Validation. If Yes: Please provide the National Archives Accession Number (field #17 on the SF-258* or in ERA) of the most recent SF-258 for permanent non-electronic records signed by your agency and NARA in FY 2010, indicating a completed transfer.**

	Percent to total documentation submitted	Validation Count
Answers verified by documentation received	41%	40
Unable to verify answers by documentation received	58%	57
Documentation incomplete or not submitted	1%	1
Total required to submit documentation		98
<i>*Standard Form 258: Agreement to Transfer Records to the National Archives of the United States</i>		
<i>**Electronic Records Archives</i>		

47. As required by your agency's NARA-approved schedule, did your agency transfer any eligible permanent electronic records to the National Archives via a SF-258* or in ERA in FY 2010? (36 CFR 1235.12)**

Answer Options	Response Percent	Response Count
Yes	19%	46
No	42%	103
None of my agency's permanent electronic records were eligible to be transferred in FY 2010	30%	74
All my agency's eligible permanent electronic records are under a records hold or freeze	3%	7
Other (Please be specific)	7%	17
Number of respondents to this question		247
<i>*Standard Form 258: Agreement to Transfer Records to the National Archives of the United States</i>		
<i>**Electronic Records Archives</i>		
Core question		

47a. Validation. If Yes: Please provide the National Archives Accession Number (field #17 on the SF-258 or in ERA) of the most recent SF-258 for permanent electronic records signed by your agency and NARA in FY 2010, indicating a completed transfer. _____

	Percent to total documentation submitted	Validation Count
Answers verified by documentation received	43%	20
Unable to verify answers by documentation received	57%	26
Documentation incomplete or not submitted	0%	0
Total required to submit documentation		46
<i>*Standard Form 258: Agreement to Transfer Records to the National Archives of the United States</i>		
<i>**Electronic Records Archives</i>		

48. If No: My agency did not transfer eligible permanent electronic records because: (Choose all that apply)

Answer Options	Response Percent	Response Count
The format of the records was not compatible with	10%	10
The records contain sensitive information	7%	7
Transfer procedures are unclear	12%	12
There is no easy way to segregate permanent from	15%	15
Other (Please be specific)	77%	79
Number of respondents to this question		123

Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions. (GRS 23, 5a)

49. Does the records management program staff as a matter of standard procedure conduct exit briefings for senior officials on the appropriate disposition of the records, including e-mail, under their immediate control?		
Answer Options	Response Percent	Response Count
Yes	49%	120
No	47%	117
Do not know	4%	10
Number of respondents to this question		247
Core question		

49a. Validation. If Yes: Please send a copy of the agency procedure or provision that mandates such exit briefings to rmsselfassessment@nara.gov.		
	Percent to total documentation submitted	Validation Count
Answers verified by documentation received	67%	80
Unable to verify answers by documentation received	17%	20
Documentation incomplete or not submitted	17%	20
Total required to submit documentation		120

50. Are the exit briefings documented for purposes of accountability?		
Answer Options	Response Percent	Response Count
Yes	83%	100
No	12%	14
Do not know	5%	6
Number of respondents to this question		120
Core question		

51. Upon separation, are senior officials required to obtain approval from records management program staff or other designated official(s) before removing personal papers and copies of records?		
Answer Options	Response Percent	Response Count
Yes	66%	163
No	32%	78
Do not know	2%	6
Number of respondents to this question		247
Core question		

Records Management Program—Electronic Records

52. Has your agency established controls, through policy and procedures, to ensure the reliability, authenticity, integrity, and usability of agency electronic records maintained in electronic information systems? (36 CFR 1236.10)

Answer Options	Response Percent	Response Count
Yes	62%	153
No	28%	69
Do not know	10%	25
Number of respondents to this question		247
Core question		

52a. Validation. If Yes: Please send a copy of your agency's policies and procedures to rmsselfassessment@nara.gov.

	Percent to total documentation submitted	Validation Count
Answers verified by documentation received	69%	106
Unable to verify answers by documentation received	16%	24
Documentation incomplete or not submitted	15%	23
Total required to submit documentation		153

53. Does your agency have procedures to enable the migration of records and associated metadata to new storage media or formats so that records are retrievable and usable as long as needed to conduct agency business and to meet NARA-approved dispositions? (36 CFR 1236.20(b)(6))

Answer Options	Response Percent	Response Count
Yes	40%	100
No	40%	99
Do not know	19%	48
Number of respondents to this question		247
Core question		

53a. Validation. If Yes: Please send a copy of your agency's migration procedures to rmsselfassessment@nara.gov.

	Percent to total documentation submitted	Validation Count
Answers verified by documentation received	59%	59
Unable to verify answers by documentation received	26%	26
Documentation incomplete or not submitted	15%	15
Total required to submit documentation		100

54. Does your agency maintain an inventory of electronic information systems? (36 CFR 1236.26 (a))

Answer Options	Response Percent	Response Count
Yes	79%	196
No	13%	32
Do not know	8%	19
Number of respondents to this question		247
Core question		

55. If Yes: Does your agency's inventory of electronic systems indicate whether each system is, or is not, covered by a NARA-approved disposition authority? (36 CFR 1236.26(b)(7))

Answer Options	Response Percent	Response Count
Yes	72%	141
No	23%	46
Do not know	5%	9
Number of respondents to this question		196

56. Does your agency ensure that records management functionality, including the capture, retrieval, and retention of records according to agency business needs and NARA-approved records schedules, is incorporated into the design, development, and implementation of its electronic information systems? (36 CFR 1236.12)

Answer Options	Response Percent	Response Count
Yes	55%	135
No	35%	87
Do not know	10%	25
Number of respondents to this question		247
Core question		

57. If Yes: How often does your agency's records management program staff participate in the design, development, and implementation of new electronic information systems? (36 CFR 1236.12)

Answer Options	Response Percent	Response Count
Always	16%	39
Most of the time	16%	40
Occasionally	26%	63
Rarely	23%	57
Never	19%	48
Number of respondents to this question		247
Core question		

58. Does your agency provide training on the retention and management of records created and maintained in electronic form? (36 CFR 1220.34(f))

Answer Options	Response Percent	Response Count
Yes	70%	172
No	29%	72
Do not know	1%	3
Number of respondents to this question		247

59. If Yes: Who receives this training? (Choose all that apply)

Answer Options	Response Percent	Response Count
All agency staff	79%	136
Contractors	44%	76
Records Liaisons Officers or similar	52%	90
Senior Officials	41%	71
Information Technology Staff	43%	74
Other (Please be specific)	12%	20
Number of respondents to this question		172

An electronic records management system (ERMS), often referred to as a records management application (RMA), is an electronic management system in which any agency records, regardless of format (paper, electronic, microform, etc.), are collected, organized, and categorized to facilitate their preservation, retrieval, use, and disposition. (NARA's records management training course, Electronic Records Management, module 1, lesson 2 (May 2010))

60. Does your agency, or any office/component unit within your agency currently have – even as a pilot project – a fully functioning Electronic Records Management System (ERMS)/Records Management Application (RMA) for maintaining and preserving electronic records?

NOTE: Backup tapes, document management systems, case management systems, data marts, and e-mail vaults are not considered to be fully functional ERMS or RMAs and are not considered appropriate for records retention.

Answer Options	Response Percent	Response Count
Yes	33%	82
No	65%	160
Do not know	2%	5
Number of respondents to this question		247

61. If Yes: Is your ERMS/RMA: (Choose all that apply)

Answer Options	Response Percent	Response Count
Currently a pilot project	39%	32
Used agency-wide	41%	34
Used in selected offices/component units only	39%	32
Number of respondents to this question		82

Automatic capture or classification systems are applications that can help people create taxonomies (the organization of a particular set of information for a particular purpose) and place documents in categories, although the amount of automation can vary. (<http://www.searchtools.com/info/classifiers.html>)

62. Does your ERMS/RMA have automatic capture/classification capability?

Answer Options	Response Percent	Response Count
Yes	61%	50
No	34%	28
Do not know	5%	4
Number of respondents to this question		82

63. Is your ERMS/RMA used for: (Choose all that apply)

Answer Options	Response Percent	Response Count
Electronic documents only	44%	70
E-mail messages only	30%	48
Managing records maintained outside the ERMS/RMA	18%	29
Other (Please be specific)	7%	11
Number of respondents to this question		158

64. If No to Q60: Is your agency in the process of developing an ERMS/RMA?

Answer Options	Response Percent	Response Count
Yes	38%	62
No	48%	80
Do not know	14%	23
Number of respondents to this question		165

65. If Yes: When does your agency plan to deploy an ERMS/RMA?		
Answer Options	Response Percent	Response Count
FY 2011	3%	2
FY 2012	16%	10
FY 2013	23%	14
FY 2014	13%	8
Other (Please be specific)	45%	28
Number of respondents to this question		62

Web 2.0 and social media are umbrella terms used to define the various activities integrating web technology, social interaction, and user-generated content. Through social media, individuals or collaborations of individuals, create, organize, edit, comment on, combine, and share content. Facebook, Twitter, Second Life, Blogs, and wikis are examples of social media. (NARA Bulletin 2011-02)

66. Does your agency or any office/component unit within your agency use social media?		
Answer Options	Response Percent	Response Count
Yes	70%	173
No	29%	71
Do not know	1%	3
Number of respondents to this question		247

67. If Yes: Has your agency developed policies and procedures for capturing and managing Federal records that are created on social media?		
Answer Options	Response Percent	Response Count
Yes	50%	87
No	43%	75
Do not know	6%	11
Number of respondents to this question		173

Cloud computing is a technology that allows users to access and use shared data and computing services via the Internet or a Virtual Private Network. It gives users access to resources without having to build infrastructure to support these resources within their own environments or networks. (NARA Bulletin 2010-05)

68. Does your agency or any office/component unit within your agency use cloud computing technologies?		
Answer Options	Response Percent	Response Count
Yes	23%	58
No	24%	60
No, but my agency is exploring the use of cloud computing technologies	40%	99
Do not know	9%	23
Other (Please be specific)	3%	7
Number of respondents to this question		247

69. If Yes: Has your agency established records management policies and procedures for managing Federal records in a cloud computing environment?		
Answer Options	Response Percent	Response Count
Yes	33%	19
No	64%	37
Do not know	3%	2
Number of respondents to this question		58

An electronic mail system means a computer application used to create, receive, and transmit messages and other documents. Excluded from this definition are file transfer utilities (software that transmits files between users but does not retain any transmission data), data systems used to collect and process data that have been organized into data files or databases on either personal computers or mainframe computers, and word processing documents not transmitted on an e-mail system. (36 CFR 1236.2)

70. Does your agency have policies and procedures in place to handle e-mail records that have a retention period longer than 180 days? (36 CFR 1236.22(c))		
Answer Options	Response Percent	Response Count
Yes	67%	166
No	28%	68
Do not know	5%	13
Number of respondents to this question		247
Core question		

70a. Validation. If Yes: Please send a copy of your agency's policies and procedures for handling e-mail records that have a retention period longer than 180 days to rmselfassessment@nara.gov.

NOTE: A recordkeeping system may be manual or electronic.

	Percent to total documentation submitted	Validation Count
Answers verified by documentation received	68%	112
Unable to verify answers by documentation received	19%	31
Documentation incomplete or not submitted	13%	22
Total required to submit documentation		166

71. How does your agency ensure that e-mail messages that are Federal records are preserved in the appropriate agency recordkeeping system? (36 CFR 1236.22(b)) (Choose all that apply)

Answer Options	Response Percent	Response Count
Policy and procedures	74%	182
Recordkeeping requirements	57%	142
Training	63%	155
Staff briefings	41%	101
Office visits	28%	69
E-mail reminders	29%	72
Other (Please be specific)	18%	44
Number of respondents to this question		247

72. What methods does your agency use to capture e-mail records? (Choose all that apply)		
Answer Options	Response Percent	Response Count
Print and file	81%	200
Save as PDF	44%	109
Storage as .PST (or other format) in Shared Network folders (Local Area Network)	46%	113
Storage in an Electronic Records Management System/Records Management Application	19%	46
Maintain in original e-mail system	43%	106
E-mail Archiving System	38%	94
Backup tapes	49%	121
Other (Please be specific)	8%	20
Number of respondents to this question		247

73. Does your agency audit or review staff compliance with the agency's e-mail preservation policies?		
Answer Options	Response Percent	Response Count
Yes	40%	66
No	55%	91
Do not know	5%	9
Number of respondents to this question		166
Core question		

74. If Yes: How often does your agency audit or review staff compliance to the agency's e-mail preservation policies?		
Answer Options	Response Percent	Response Count
Every 6 months	23%	15
Every year	33%	22
Every 2 years	9%	6
Less frequently than every 2 years	29%	19
Do not know	6%	4
Number of respondents to this question		66
Core question		

75. Does your agency provide training on the retention and management of e-mail records? (36 CFR 1220.34(f))		
Answer Options	Response Percent	Response Count
Yes	69%	171
No	29%	71
Do not know	2%	5
Number of respondents to this question		247
Core question		

76. If Yes: Is this training mandatory for all staff, including contractor staff and senior officials?		
Answer Options	Response Percent	Response Count
Yes	63%	108
No	36%	61
Do not know	1%	2
Number of respondents to this question		171
Core question		

E-mail archiving generally refers to applications that remove e-mail from the mail server and manage it in a central location also known as an archive. Information technology professionals use the term “archiving” to mean the copying or transfer of files for storage. In general, these applications collect in a central repository the e-mail (which may include attachments, calendars, task lists, etc.) of some or all agency users. E-mail archiving applications typically require little to no action on the part of the user to store or manage the e-mail records. Once messages are stored, authorized users are able to search the repository. (NARA Bulletin 2011-03, December 22, 2010, Guidance Concerning the use of E-mail Archiving Applications to Store E-mail)

77. Has your agency, or any office/component unit within your agency, adopted an e-mail archiving application?		
Answer Options	Response Percent	Response Count
Yes	41%	102
No	51%	127
Do not know	7%	18
Number of respondents to this question		247

78. If No: Has your agency taken steps to adopt or deploy an e-mail archiving application?		
Answer Options	Response Percent	Response Count
Yes	35%	51
No	48%	69
Do not know	17%	25
Number of respondents to this question		145

79. If Yes: When does your agency plan to adopt or deploy an e-mail archiving application?		
Answer Options	Response Percent	Response Count
FY 2011	6%	3
FY 2012	39%	20
FY 2013	10%	5
FY 2014	4%	2
Other (Please be specific)	41%	21
Number of respondents to this question		51

80. If Yes to Q77: Does your agency or office/component unit use its e-mail archiving application for official recordkeeping of electronic mail messages?		
Answer Options	Response Percent	Response Count
Yes	34%	35
No	61%	62
Do not know	5%	5
Number of respondents to this question		102

81. If Yes: What steps does your agency take to manage the retention and disposition of Federal records in current e-mail archiving applications? (NARA Bulletin 2011-03, December 22, 2010, Guidance Concerning the use of E-mail Archiving Applications to Store E-mail). (Choose all that apply)		
Answer Options	Response Percent	Response Count
Policies and procedures	50%	51
User training	27%	28
Monitoring records stored in the system	23%	23
Other (Please be specific)	45%	46
Number of respondents to this question		102

81a. Please provide a copy of your agency's records disposition policy for its e-mail archive to rmsselfassessment@nara.gov.

82. If No to Q80: Has your agency or any office/component unit within your agency adopted an e-mail archiving application for a purpose <u>other than</u> for official recordkeeping of electronic mail messages?		
Answer Options	Response Percent	Response Count
Yes	71%	46
No	20%	13
Do not know	9%	6
Number of respondents to this question		65

83. If Yes: What is the purpose of your agency's or office/component unit's e-mail archiving application? Please be specific.

84. How many FTEs are in your agency/organization? (Choose one)		
Answer Options	Response Percent	Response Count
500,000 or more FTEs	3%	7
100,000 – 499,999 FTEs	2%	6
10,000 – 99,999 FTEs	21%	51
1,000 – 9,999 FTEs	31%	77
100 – 999 FTEs	28%	68
1 – 99 FTEs	13%	33
Not Available	2%	5
Number of respondents to this question		247

85. What other offices or program areas did you consult when you completed this self-assessment? (Choose all that apply)		
Answer Options	Response Percent	Response Count
Office of the General Counsel	23%	58
Program Managers	31%	76
Information Technology staff	62%	153
Records Liaison Officers or similar	47%	115
Administrative staff	29%	72
Other (Please be specific)	22%	55
None	20%	50
Number of respondents to this question		247

86. How much time did it take you to gather the information to complete this self-assessment?		
Answer Options	Response Percent	Response Count
Under 3 hours	31%	76
More than 3 hours but less than 6 hours	26%	65
More than 6 hours but less than 10 hours	13%	32
Over 10 hours	30%	74
Number of respondents to this question		247

Please provide your contact information.

Name:

Agency, Bureau, or Office:

Job Title:

Address:

Address 2:

City/Town:

State:

ZIP/Postal Code:

E-Mail Address:

Phone Number:

Are you the Records Officer?		
Answer Options	Response Percent	Response Count
Yes	87%	215
No	13%	32
<i>Number of respondents to this question</i>		247

If No: Please provide the name of your agency's Records Officer.

Records Officers' E-mail Address

Records Officer's Phone Number

NARA reserves the right to request additional documentation or a follow-up meeting to verify your responses. If you wish to provide supporting documentation for your answers or other information to NARA, please send it to rmsselfassessment@nara.gov.

Thank you for completing the FY 2011 Records Management Self-Assessment!

APPENDIX IV:

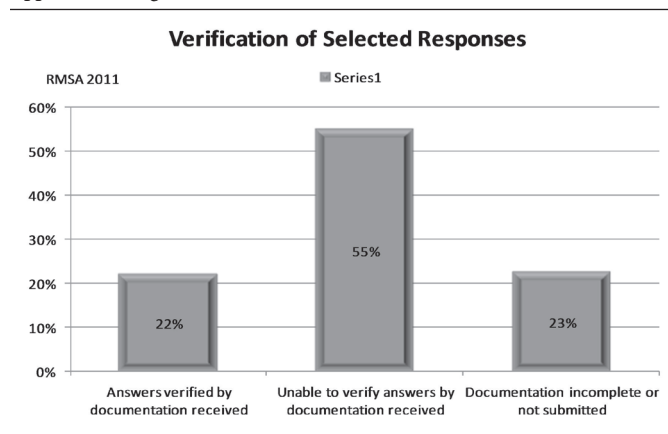
Results of Verification of Documentation Submitted for Validation Questions

The 2011 Records Management Self-Assessment requested documentation from responders to verify their answers to 12 questions in the survey.

The illustration to the right shows the overall results of processes described in the validation section of the 2011 Records Management Self-Assessment.

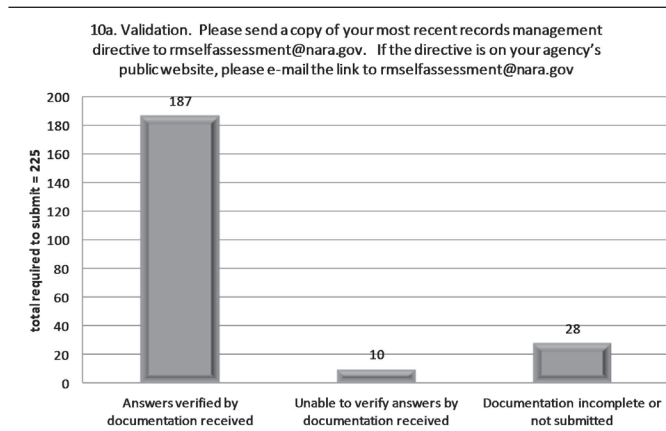
The results show the number of selected responses verified by documents received; the number where one or more answers *could not* be verified based on the documents received, or the documentation was either incomplete or not submitted at all.

Appendix IV: Figure 1



Verification results for specific questions used to validate responses: Question 10a

Appendix IV: Figure 2: Question 10a



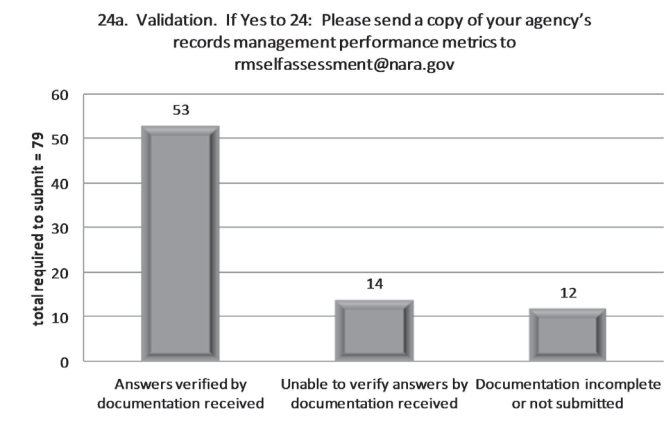
Question 10a requested documentation from those answering "Yes" to Q9: Does your agency have a records management directive(s)? (36 CFR 1220.34(c)) and the date choices in Q10 asking when the last time the directive was updated.

Directives were evaluated using guidance in NARA's publication *Disposition of Federal Records*.

To meet the minimum standard the directive must: state agency's commitment to the authorized, timely and orderly disposition of records; designates the agency records officer [or other position] as the official responsible for the program; permits delegation of authority to involve all parts of the agency in the program; and covers the entire records management program.

Question 24a

Appendix IV: Figure 3: Question 24a

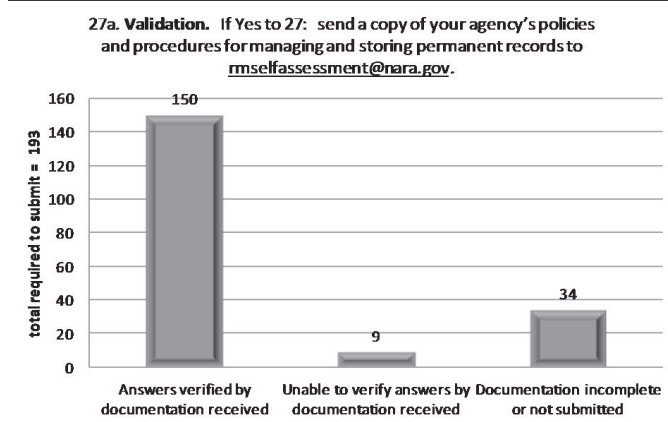


Question 24a requested documentation from those answering “Yes” to Q24: Does your agency’s records management program have established metrics to assess the effectiveness of the program?

Documentation was reviewed to confirm the existence of performance metrics related to records management program activities.

Question 27a

Appendix IV: Figure 4: Question 27a

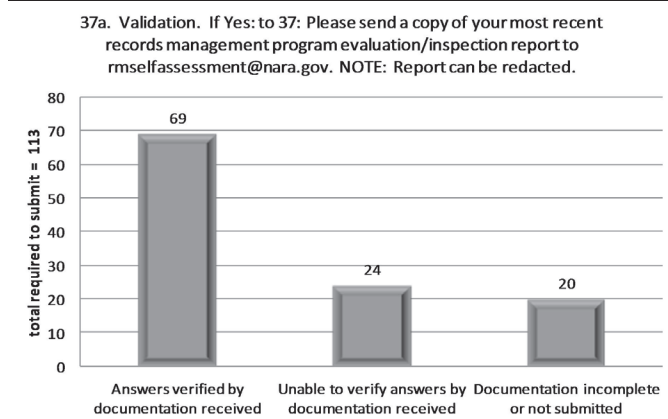


Question 27a requested documentation from those answering “Yes” to Q27: Does your agency’s records management program have policies and procedures that instruct staff on how your agency’s permanent records in all formats must be managed and stored? (36 CFR 1222.34(e))

Documentation was reviewed to confirm agency has policy identifying permanent records and provides some guidance on appropriate handling.

Question 37a

Appendix IV: Figure 5: Question 37a

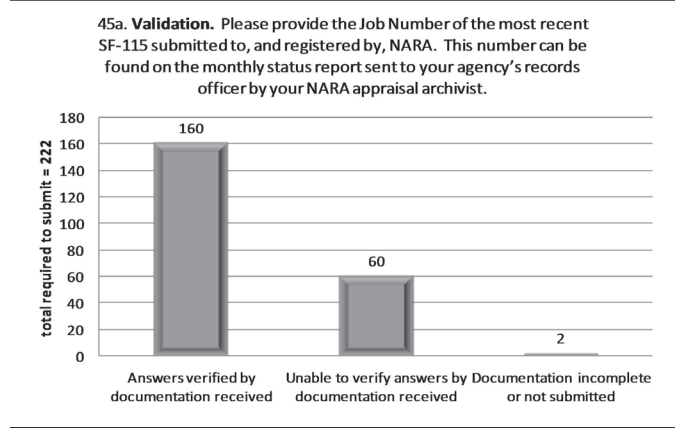


Question 37a requested documentation from those answering a series of questions regarding conducting an evaluation/inspection starting with Q32 and answering specifically “Yes” to question Q37: Was a formal report prepared after the evaluation/inspection was completed? Reports were evaluated using guidance in NARA’s publication *Disposition of Federal Records*.

To meet the minimum standard the report must: be an evaluation of a records management program or part of a program (i.e. electronic records or vital records); and comply with the agency's Records Management Program directive.

Question 45a

Appendix IV: Figure 6: Question 45a



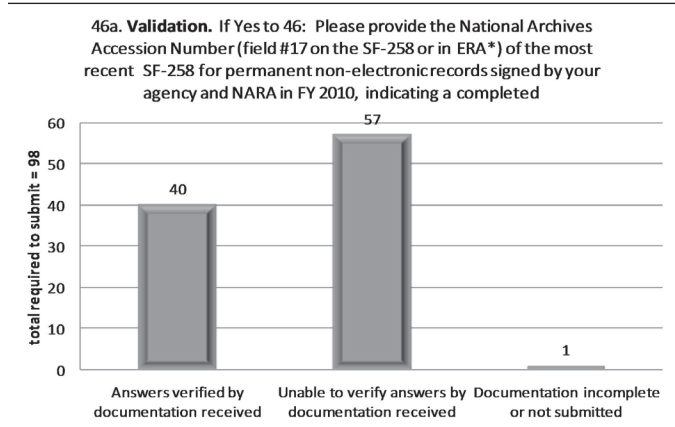
Question 45a requested the Job Number for the most recent SF-115 in order to verify the answer selected for Q45: When was the last time your agency submitted a records schedule (e.g., SF-115) that was accepted (registered and assigned a Job Number) by NARA? (36 CFR 1224.10(c) and 36 CFR 1225.12(i))

Data received was verified by using NARA records of Job Numbers.

To meet validation the job number provided needed to match NARA data including fiscal year.

Question 46a

Appendix IV: Figure 7: Question 46a



Question 46a requested the National Archives Accession Number (field #17 on the SF-258 or in ERA*) of the most recent SF-258 signed in FY2010 from those answering "Yes" to Q46: As required by your agency's NARA-approved schedule, did your agency transfer any eligible permanent non-electronic records to the National Archives via a SF-258 in FY 2010? (36 CFR 1235.12)

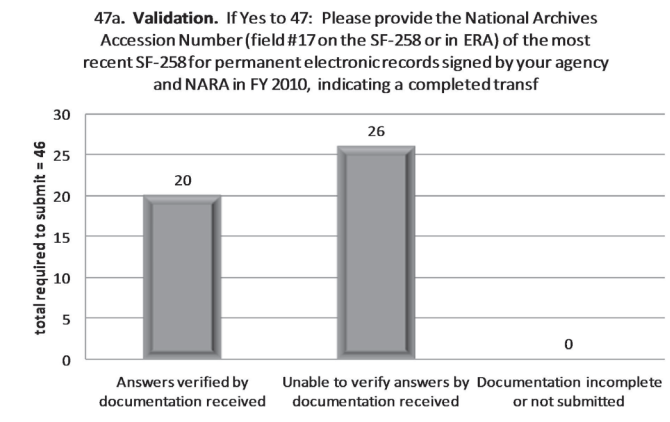
Data received was verified by using NARA records of permanent records transfers.

To meet validation the accession number provided needed to match NARA data including fiscal year.

*ERA: Electronic Records Archives

Question 47a

Appendix IV: Figure 8: Question 47a



Question 47a requested the National Archives Accession Number (field #17 on the SF-258 or in ERA*) of the most recent SF-258 signed in FY2010, from those answering “Yes” to Q47: As required by your agency’s NARA-approved schedule, did your agency transfer any eligible permanent electronic records to the National Archives via a SF-258 or in ERA* in FY 2010? (36 CFR 1235.12)

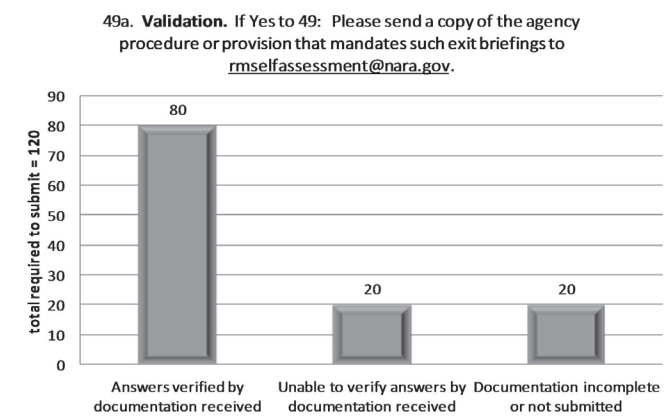
Data received was verified by using NARA records of permanent records transfers.

To meet validation the accession number provided needed to match NARA data including fiscal year.

*ERA: Electronic Records Archives

Question 49a

Appendix IV: Figure 9: Question 49a



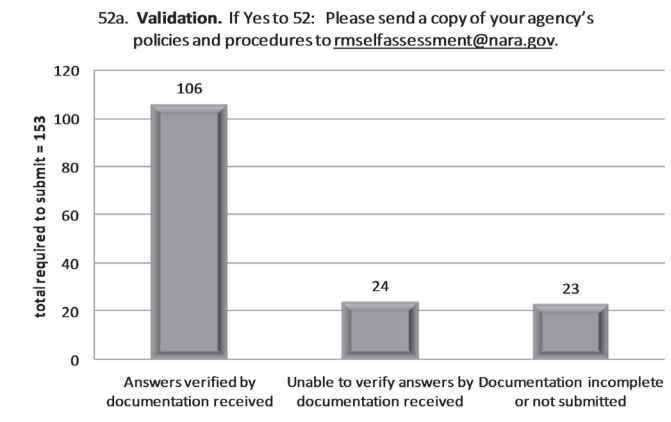
Question 49a requested documentation from those answering “Yes” to Q49: Does the records management program staff as a matter of standard procedure conduct exit briefings for senior officials on the appropriate disposition of the records, including e-mail, under their immediate control?

Documentation submitted was reviewed to confirm that exit interviews included records management.

Types of documents validated included written policy and procedure, exit interview forms, exit interview checklists or other materials that indicated before leaving the agency staff were asked about their records.

Question 52a

Appendix IV: Figure 10: Question 52a

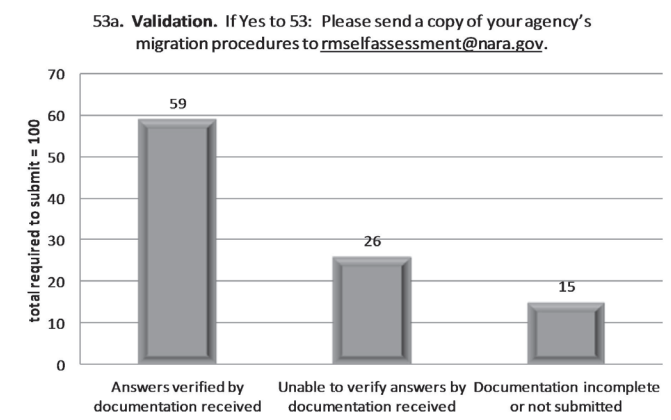


Question 52a requested documentation for those answering “Yes” to Q52: Has your agency established controls, through policy and procedures, to ensure the reliability, authenticity, integrity, and usability of agency electronic records maintained in electronic information systems? (36 CFR 1236.10)

Documentation submitted was reviewed to confirm that the agency considered records management issues when creating or using electronic information systems.

Question 53a

Appendix IV: Figure 11: Question 53a

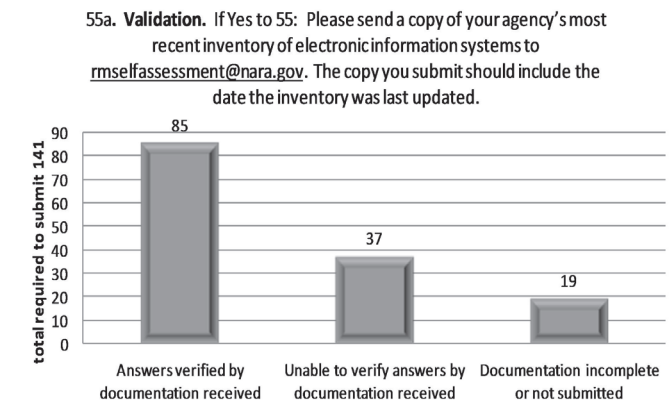


Question 53a requested documentation from those who answered “Yes” to Q53: Does your agency have procedures to enable the migration of records and associated metadata to new storage media or formats so that records are retrievable and usable as long as needed to conduct agency business and to meet NARA-approved dispositions? (36 CFR 1236.20(b)(6))

Documentation submitted was reviewed to confirm that the agency was aware of data migration issues as they pertain to records management.

Question 55a

Appendix IV: Figure 12: Question 55a



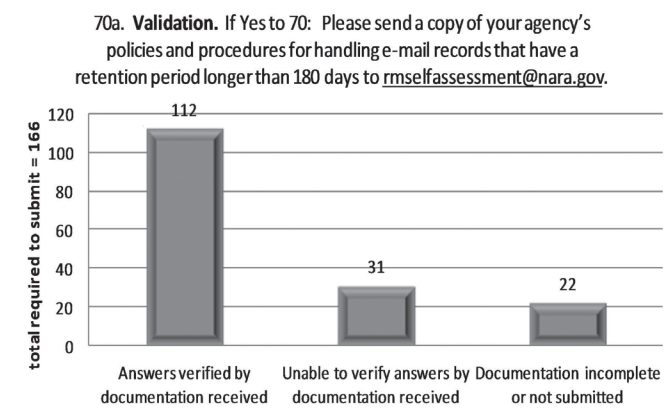
Question 55a requested documentation from those who answered “Yes” to Q54: Does your agency maintain an inventory of electronic information systems? (36 CFR 1236.26 (a)) and Q55: Does your agency’s inventory of electronic systems indicate whether each system is, or is not, covered by a NARA-approved disposition authority? (36 CFR 1236.26(b)(7)).

Inventories were evaluated using guidance in *NARA Bulletin 2010-02: Continuing Agency Responsibilities for Scheduling Electronic Records* (February 5, 2010).

To meet the minimum validation standard the inventory must: identify the electronic series or systems and indicate whether they are scheduled or unscheduled.

Question 70a

Appendix IV: Figure 13: Question 70a



Question 70a requested documentation from those who answered “Yes” to Q70: Does your agency have policies and procedures in place to handle e-mail records that have a retention period longer than 180 days? (36 CFR 1236.22(c))

Documentation submitted was evaluated using guidance in 36 CFR 1236.22 and *NARA Bulletin 2011-03: Guidance Concerning*

the use of E-mail Archiving Applications to Store E-mail (December 30, 2010).

To meet the minimum validation standard the policy must state that: names of sender and addressee(s) and date the message sent must be preserved; and attachments preserved as part of the email or linked.

APPENDIX V:

Core Questions, Special Focus Questions, and Total Scores by Risk Factor

LOW RISK	Core Questions Max 80 pts	Special Focus Questions Max 20 pts	Total Score Max 100 pts
Board of Governors of the Federal Reserve System and the Federal Open Market Committee	74	18	92
Department of Defense			
Defense Information Systems Agency	76	18	94
Department of Health and Human Services			
Centers for Medicare and Medicaid Services	73	20	93
Food and Drug Administration	72	18	90
National Institutes of Health	70	20	90
Department of Homeland Security			
U.S. Citizenship and Immigration Services	76	20	96
U.S. Secret Service	72	20	92
Department of Justice			
Offices, Boards, and Divisions	70	20	90
Department of State			
Headquarters Records Officer	72	20	92
Department of the Interior			
Bureau of Indian Affairs	80	18	98
Bureau of Reclamation	77	18	95
Department Level	75	20	95
National Park Service	77	15	92
Office of Surface Mining Reclamation and Enforcement	79	20	99
Office of the Special Trustee for American Indians	80	18	98

LOW RISK	Core	Special	Total Score
	Questions	Focus	
	Max 80 pts	Max 20 pts	Max 100 pts

Department of the Treasury

Department Records Officer	73	20	93
Internal Revenue Service	74	20	94
Environmental Protection Agency	73	20	93
Federal Communications Commission	70	20	90
Federal Housing Finance Agency	74	20	94
Office of Personnel Management	76	20	96
Overseas Private Investment Corporation	77	15	92
U.S. Government Accountability Office	71	20	91
U.S. International Trade Commission	75	20	95
U.S. Securities and Exchange Commission	73	20	93

MODERATE RISK

Administrative Office of the U.S. Courts	54	20	74
Central Intelligence Agency	70	18	88

Department of Agriculture

Agricultural Marketing Service	55	5	60
Farm Service Agency	56	8	64
National Institute of Food and Agriculture	62	12	74
Natural Resources Conservation Service	59	20	79
Risk Management Agency	51	10	61
Rural Development	53	15	68
U.S. Forest Service	57	20	77

Department of Commerce

Bureau of Economic Analysis	64	20	84
National Institute of Standards and Technology	66	15	81
National Oceanic and Atmospheric Administration	57	20	77
National Technical Information Service	66	10	76
U.S. Patent and Trademark Office	50	10	60

MODERATE RISK

	Core Questions Max 80 pts	Special Focus Questions Max 20 pts	Total Score Max 100 pts
Department of Defense			
Business Transformation Agency	45	15	60
Defense Commissary Agency	57	20	77
Defense Finance and Accounting Service	57	20	77
Defense Logistics Agency	53	20	73
Defense Security Service	66	13	79
Defense Threat Reduction Agency	61	20	81
Department of the Air Force	70	15	85
Department of the Army	52	15	67
Department of the Navy	65	5	70
Department of the Navy/U.S. Marine Corps	53	20	73
Joint Chiefs of Staff	71	10	81
Missile Defense Agency	78	10	88
National Reconnaissance Office	60	15	75
National Security Agency	59	17	76
Office of the Secretary of Defense	71	15	86
U.S. African Command	71	10	81
U.S. Army Training and Doctrine Command	58	10	68
Department of Energy			
Department Records Officer	48	18	66
Energy Information Administration	58	15	73
Federal Energy Regulation Commission	52	15	67
Southeastern Power Administration	67	10	77
Department of Health and Human Services			
Administration for Children and Families	58	10	68
Agency for Healthcare Research and Quality	73	15	88
Centers for Disease Control and Prevention	65	13	78
Department Records Officer	55	20	75
Health Resources and Services Administration	62	18	80
Indian Health Service	48	20	68
Office of the Secretary	64	15	79

MODERATE RISK	Core	Special	Total Score
	Questions Max 80 pts	Focus Questions Max 20 pts	
Department of Homeland Security			
National Protection and Programs Directorate	56	5	61
U.S. Coast Guard	45	15	60
U.S. Immigration and Customs Enforcement	53	10	63
US-VISIT	61	10	71
Department of Justice			
Bureau of Alcohol, Tobacco, Firearms and Explosives	41	20	61
Executive Office for Immigration Review	54	13	67
Executive Office for United States Attorneys	68	15	83
Federal Bureau of Investigation	68	15	83
United States Marshals Service	62	10	72
Department of Labor			
Adjudicatory Boards	53	8	61
Bureau of Labor Statistics	67	20	87
Department Records Officer (Office of the Assistant Secretary for Administration and Management, Business Operations Center)	68	20	88
Employee Benefits Security Administration	51	20	71
Employment and Training Administration	67	20	87
Mine Safety and Health Administration	53	10	63
Occupational Safety and Health Administration	66	18	84
Office of Administrative Law Judges	42	18	60
Office of Disability Employment Policy	56	15	71
Office of Federal Contract Compliance Programs	51	15	66
Office of Inspector General, Office of Legal Services	54	13	67
Office of Labor-Management Standards	56	20	76
Office of the Assistant Secretary for Administration and Management	61	10	71
Office of the Chief Financial Officer	48	15	63
Office of the Secretary	46	15	61
Office of the Solicitor	56	20	76

MODERATE RISK	Core	Special	Total Score
	Questions Max 80 pts	Focus Questions Max 20 pts	
Office of Workers' Compensation Programs	61	15	76
Wage and Hour Division	49	20	69
Women's Bureau	46	15	61
Department of the Interior			
Bureau of Land Management	71	15	86
Bureau of Ocean Energy Management Regulation and Enforcement	61	10	71
Office of the Secretary	53	15	68
Department of the Treasury			
Financial Management Service	59	8	67
Office of the Comptroller of the Currency	63	20	83
United States Mint	71	18	89
Department of Transportation			
Federal Highway Administration	56	20	76
Federal Railroad Administration	67	20	87
Federal Transit Administration	50	15	65
John A. Volpe National Transportation System Center	55	5	60
Maritime Administration	45	15	60
National Highway Traffic Safety Administration	66	20	86
Office of the Chief Information Officer	54	15	69
Department of Veterans Affairs			
Department Level	66	20	86
Veterans Health Administration	63	20	83
Equal Employment Opportunity Commission	56	20	76
Executive Office of the President			
Council on Environmental Quality	66	10	76
Office of Management and Budget	64	0	64
Office of Science and Technology Policy	69	10	79
Office of the U.S. Trade Representative	60	5	65

MODERATE RISK	Core	Special	Total Score
	Questions	Focus	
	Max 80 pts	Max 20 pts	Max 100 pts
Farm Credit Administration	54	10	64
Federal Maritime Commission	46	15	61
Federal Retirement Thrift Investment Board	70	10	80
Federal Trade Commission	68	15	83
General Services Administration	46	18	64
Institute of Museum and Library Services	52	20	72
Millennium Challenge Corporation	58	18	76
Morris K. Udall Foundation	65	15	80
National Archives and Records Administration	68	20	88
National Labor Relations Board	62	18	80
National Mediation Board	58	15	73
National Science Foundation	63	8	71
Office of the Director of National Intelligence	60	20	80
Pension Benefit Guaranty Corporation	47	20	67
Social Security Administration	69	20	89
Tennessee Valley Authority	61	15	76
U.S. Agency for International Development	56	20	76
U.S. Nuclear Regulatory Commission	59	20	79
U.S. Office of Government Ethics	62	10	72
United States Sentencing Commission	70	15	85

HIGH RISK	Core	Special	Total Score
	Questions Max 80 pts	Focus Questions Max 20 pts	
Architectural and Transportation Barriers Compliance Board (Access Board)	23	15	38
Armed Forces Retirement Home	53	5	58
Barry M. Goldwater Scholarship Foundation	9	3	12
Broadcasting Board of Governors/International Broadcasting Bureau	20	0	20
Chemical Safety and Hazard Investigation Board	40	12	52
Commodity Futures Trading Commission	36	3	39
Congressional Budget Office	42	5	47
Corporation for National and Community Service	35	15	50
Court Services and Offender Supervision Agency	30	20	50
Court Services and Offender Supervision Agency/Pretrial Services Agency	29	15	44
Defense Nuclear Facilities Safety Board	33	10	43
Department of Agriculture			
Agricultural Research Service/OCIO OMAR	38	10	48
Animal Plant and Health Inspection Service	38	10	48
Economic Research Services	36	8	44
Food and Nutrition Service	42	10	52
Food Safety and Inspection Service	25	5	30
Grain Inspection, Packers and Stockyards Administration	41	15	56
National Agricultural Statistics Service	35	2	37
Office of the Chief Information Officer, Technology Planning Architecture and E-Government	47	5	52
Department of Commerce			
Bureau of Industry and Security	46	10	56
Economic Development Administration	11	0	11
National Telecommunications and Information Administration	43	5	48
Office of the Chief Information Officer	52	5	57
U.S. Census Bureau	38	5	43

HIGH RISK	Core	Special	Total Score
	Questions	Focus	
	Max 80 pts	Max 20 pts	Max 100 pts
Department of Defense			
Army and Air Force Exchange Service	21	15	36
Defense Contract Audit Agency	21	0	21
Defense Contract Management Agency	15	5	20
Defense Intelligence Agency	47	12	59
Defense Technical Information Center	27	5	32
Installation Management Command	25	5	30
Joint Warfare Analysis Center	47	10	57
National Geospatial Intelligence Agency	49	5	54
Office of Inspector General	51	2	53
Office of Privacy, Records, and Disclosure	45	5	50
U.S. Army Corps of Engineers	43	15	58
U.S. Army Forces Command	15	5	20
U.S. Army Materiel Command	19	8	27
U.S. Central Command	51	8	59
U.S. European Command	38	15	53
U.S. Northern Command	42	10	52
U.S. Pacific Command	36	15	51
U.S. Southern Command	33	5	38
U.S. Special Operations Command	36	10	46
U.S. Strategic Command	44	0	44
U.S. Transportation Command	36	5	41
Department of Education			
Headquarters Records Officer	53	5	58
Department of Energy			
Bonneville Power Administration	43	10	53
National Nuclear Security Administration	36	15	51
Southwestern Power Administration	30	10	40
Western Area Power Administration	43	13	56
Department of Health and Human Services			
Administration on Aging	46	10	56
Substance Abuse and Mental Health Services Administration	49	10	59

HIGH RISK	Core	Special	Total Score
	Questions Max 80 pts	Focus Questions Max 20 pts	
Department of Homeland Security			
Federal Emergency Management Agency	48	10	58
Federal Law Enforcement Training Center	27	15	42
Headquarters Records Officer	45	8	53
Transportation Security Administration	44	15	59
U.S. Customs and Border Protection	20	10	30
Department of Housing and Urban Development			
Department Records Officer	44	15	59
Office of Inspector General	38	12	50
Department of Justice			
Drug Enforcement Administration	42	12	54
Federal Bureau of Prisons	30	15	45
National Drug Intelligence Center	31	10	41
Office of Justice Programs	49	8	57
Department of Labor			
Office of Congressional and Intergovernmental Affairs	27	5	32
Office of Public Affairs	36	15	51
Office of the Assistant Secretary of Policy	37	5	42
Department of the Interior			
Indian Arts and Crafts Board	4	0	4
National Business Center	11	5	16
U.S. Fish and Wildlife Service	30	2	32
U.S. Geological Survey	23	5	28
Department of the Treasury			
Alcohol and Tobacco Tax and Trade Bureau	40	5	45
Bureau of Engraving and Printing	29	3	32
Bureau of the Public Debt	47	10	57
Department of Transportation			
Federal Aviation Administration	40	5	45
Federal Motor Carrier Safety Administration	42	10	52

HIGH RISK	Core	Special	Total Score
	Questions Max 80 pts	Focus Questions Max 20 pts	
Office of Inspector General	38	10	48
Office of the Secretary	46	5	51
Pipeline and Hazardous Material Safety Administration	35	5	40
Research and Innovative Technology Administration	16	10	26
Surface Transportation Board	44	15	59
Executive Office of the President			
Office of National Drug Control Policy	48	5	53
Export Import Bank of the United States	26	10	36
Federal Election Commission	15	8	23
Federal Mine Safety and Health Review Commission	16	5	21
Government Printing Office	15	0	15
Inter-American Foundation	37	10	47
International Boundary and Water Commission (US/Mexico)	31	5	36
Library of Congress	27	18	45
Marine Mammal Commission	3	0	3
Merit Systems Protection Board	14	10	24
National Aeronautics and Space Administration	39	15	54
National Capital Planning Commission	43	8	51
National Credit Union Administration	14	5	19
National Endowment for the Arts	25	5	30
National Endowment for the Humanities	18	5	23
National Indian Gaming Commission	19	3	22
National Transportation Safety Board	42	8	50
Occupational Safety and Health Review Commission	21	10	31
Peace Corps	27	5	32
Postal Regulatory Commission	3	0	3
Presidio Trust	9	5	14
Railroad Retirement Board	33	3	36
Recovery Accountability and Transparency Board	43	0	43
Selective Service System	19	5	24
Small Business Administration	41	15	56

HIGH RISK	Core	Special	Total Score
	Questions Max 80 pts	Focus Questions Max 20 pts	
U.S. African Development Foundation	39	10	49
U.S. Commission of Fine Arts	15	0	15
U.S. Consumer Product Safety Commission	33	3	36
U.S. Office of Special Counsel	23	0	23
U.S. Tax Court	49	10	59
U.S. Trade and Development Agency	41	5	46
United States Commission on Civil Rights	42	5	47



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