



NATIONAL
ARCHIVES

2012 RECORDS MANAGEMENT

SELF-ASSESSMENT REPORT

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

NATIONAL ARCHIVES *and* RECORDS ADMINISTRATION

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FOREWORD

The National Archives and Records Administration (NARA) conducted the fourth annual Records Management Self-Assessment (RMSA) and analysis from June through October 2012. NARA uses the annual RMSA as a tool to determine if Federal agencies are meeting the statutory and regulatory requirements for records management.

On August 24, 2012, the Office of Management and Budget (OMB) and NARA issued the Managing Government Records Directive¹ as a significant first step in an “executive branch wide effort to reform records management policies and practices.” The Directive sets forth a robust 21st-century framework for managing Federal records and information.

The RMSA supports this framework by collecting data on Federal records management programs. NARA analyzes this data to identify specific areas of weakness common to most Federal records management programs and consider initiatives aimed at addressing these issues. Pursuant to the Directive, NARA and agencies must work together to resolve the most persistent weaknesses, specifically electronic records management, training, and lack of senior level support. NARA’s RMSA team will participate in this important effort by linking future surveys to the Directive’s requirements.

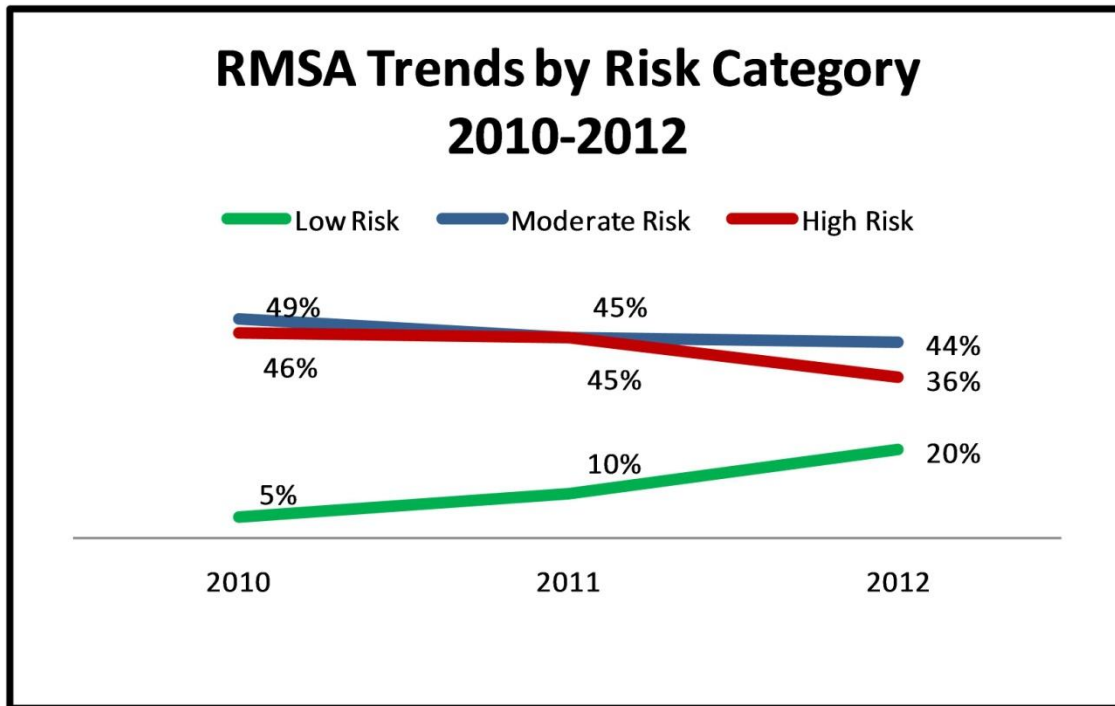
¹ M-12-18: Managing Government Records Directive (August 24, 2012) is available via <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

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EXECUTIVE SUMMARY

In June 2012, the National Archives and Records Administration (NARA) issued the fourth annual mandatory records management self-assessment (RMSA) to Federal agencies. NARA conducts these self-assessments, as well as inspections and evaluations, in our capacity as the oversight entity for Federal records management. The goal of the self-assessments is to determine whether Federal agencies are compliant with statutory and regulatory records management requirements.

There has been some improvement this year over the first three RMSAs. We received responses from all Cabinet-level department records officers, most departmental components, and most independent agencies. As we did in the previous RMSAs, we scored selected questions and assigned each agency a total score that placed them in the low, moderate, or high risk categories. The risk category breakdown this year is: 20% low risk, 44% moderate risk, and 36% high risk. This represents an increase in the number of agencies that scored in the low risk category. We remind readers that the low, moderate, and high risk rankings described in this report are only one indicator of an agency's compliance with Federal records management regulations and policies.



Findings

Many of our findings have remained consistent over the last 2 years, especially in the records management program activities, records disposition, and electronic records sections. Our key findings are:

- Many agency records management staff are participating in the design and development of electronic systems and working collaboratively with other units on issues related to electronic records;
- Many agencies lack a clear understanding of what constitutes internal controls; and
- Of the agencies that have internal controls, few test them on a regular basis to assess their effectiveness.

In addition to our key findings, this report presents some general findings:

- The lack of senior management support, resources, and funding continues to challenge agency records management programs; however, many agencies are working to overcome these challenges and improve their programs; and
- Some agencies are updating and revising their directives, policies, and records schedules.

Recommendations

In previous RMSA reports, NARA made recommendations for executive action, some of which are repeated in the Managing Government Records Directive² issued by OMB and NARA in August 2012. In Appendix I: Recommendations for Executive Action, we list these recommendations as they tie into specific goals and targets in the Directive.

Section 2.1 of the Directive defines roles and accountability for Senior Agency Officials (SAOs) as they work with their Agency Records Officers (AROs) to improve their programs and meet the requirements of the Directive. This year, based on the RMSA data, we make new recommendations directed at these SAOs:

- SAOs must take the responsibility to ensure that all parts of their agency understand the importance of effective records and information management in meeting mission needs;
- The SAO must ensure compliance with records management regulations and policies throughout the organization; and
- SAOs must ensure that their agency deploys the resources required to meet the broader Directive goals and ensure that their Agency Records Officer and general records and information staff members have the support needed to carry out their responsibilities.

We also make recommendations aimed at Federal agency records management program staff generally, based on our analysis of the 2012 RMSA data:

² <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

- Agencies need to establish well-defined and meaningful performance goals for their major records management program activities based on regulations and best practices;
- Agencies must also develop sound performance measures that are linked to these goals;
- Agencies must develop internal controls that provide reasonable assurance that their programs comply with all Federal records management laws and regulations; and
- Agencies should continue to pursue technological solutions to electronic recordkeeping and engage in efforts by NARA and other oversight entities to meet the goals in the Managing Government Records Directive in this area.

Conclusion

In response to the Directive, NARA is undertaking a number of activities that will support these recommendations. NARA will develop updated format guidance for permanent electronic records and the management of e-mail records, explore and stimulate automated approaches for managing digital record content (e-mail, social media), and identify solutions and requirements for cloud-based records management and storage. NARA will also work with agencies to help them identify their unscheduled records and their permanent records that are 30 years old or older. Additionally, NARA will identify a government-wide analytical tool that can be used to assess records management compliance levels across the government.

The Directive also requires that NARA, in cooperation with the Federal Records Council, the Federal Chief Information Officers Council, and other stakeholders, establish a Community of Interest to solve specific records management challenges. Finally, NARA will work with the Office of Personnel Management (OPM) to create a formal records management occupational series to elevate the roles, responsibilities, and skill sets of Federal records officers and other records management staff.

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FY 2012 RECORDS MANAGEMENT SELF-ASSESSMENT

INTRODUCTION

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, highlights 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.

Authority

44 United States Code (U.S.C.) 2904 and 2906 authorizes NARA 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 OMB.

Methodology

In the Fiscal Year (FY) 2011 RMSA, we identified a set of “core” questions covering the essential elements of a compliant Federal records management program. We modified these questions slightly for this year's questionnaire, enhancing definitions of terms and changing wording for improved clarity. We also added an option for respondents to indicate that they represented micro-agencies with less than 100 FTE (full-time equivalent), since these small organizations may not have the ability to meet certain requirements in the regulations.

This year we eliminated special focus questions from the questionnaire. As the survey has evolved we realized that these questions, which changed each year, made it difficult for agencies to measure their progress within the RMSA framework. The questionnaire included only the core questions, a small number of non-scored questions, and three optional questions.

This year we sent the self-assessment to 281 agencies. In total, 241 or 85 percent of these agencies responded. This number includes all Cabinet-level department records officers, 88 percent of Cabinet-level sub-agencies and bureaus, all agencies under the Executive Office of the President, and 81 percent of independent agencies. Earlier this fiscal year, agencies received individual reports that included their scores, risk factors, and critiques of documents submitted for review.

Scoring

The RMSA has four main sections: Records Management Program - Activities; Records Management Program - Oversight and Compliance; Records Management Program - Records Disposition; and Records Management Program - Electronic Records.

There are 100 possible points that are distributed across the sections as follows:

Maximum Point Values (per section)

1. Records Management Program - Activities (21 points)
2. Records Management Program - Oversight and Compliance (31 points)
3. Records Management Program - Records Disposition (15 points)
4. Records Management Program - Electronic Records (33 points)

An agency's overall score determines its risk category. Agencies should use the results of the RMSA to analyze their records management programs and target areas for improvement.

The risk categories are:

Low Risk: Scores 90 - 100

Moderate Risk: Scores 60 - 89

High Risk: Scores 0 - 59

FY 2012 RECORDS MANAGEMENT SELF-ASSESSMENT

DOCUMENT REVIEW

This is the third year that NARA has collected documentation from agencies in support of their answers to specific questions. For this RMSA we requested documentation for nine questions pertaining to the agencies' internal training curricula, internal evaluations/inspections/audits, performance goals and measures, transfer of permanent records, electronic records inventories, and e-mail policy. We also developed review criteria – based on the regulations, NARA guidance, and records management best practices – that we distributed to agencies in advance.

Findings

- Overall, the quality of agencies' documentation improved over last year;
- NARA reviewers saw particular improvement in the documentation supporting training and permanent records transfer activities; and
- Documentation for records management program performance goals and measures were the weakest when compared to the criteria provided.

Document Review Process

Agencies were required to submit documentation only if they answered “yes” to selected questions. We assessed the documentation against our established criteria. In some cases, we did not receive any documentation, despite “yes” answers in the survey, or the files we did receive were corrupted or encrypted. In a few instances, agencies sent materials without identifying which of the nine questions the documents were intended to support. In all of these cases we contacted the agencies with mostly favorable results.

Results

Some agencies provided excellent documentation that met most or all of our criteria for specific questions, and a few submitted materials that supported all their positive answers to these nine questions. Conversely, other agencies' documentation showed significant gaps, either in their understanding of the NARA criteria or in their programs themselves. For example, some agencies sent copies of NARA's records management training slides instead of agency-developed training curricula. Others substituted records related to records appraisal or scheduling activity for electronic system inventories. As listed in the Findings above, the documents we received for the questions about records management performance measures and goals were weak when compared to the initial criteria we provided to the agencies. (See Section Two: Records Management Program – Oversight and Compliance for further discussion on performance measures and goals.)

SECTION ONE: RECORDS MANAGEMENT PROGRAM

ACTIVITIES

This section focuses on major records management program areas including organizational structure, policy directives, and training. Seven of the 10 questions were scored. We asked agencies to submit documentation to support their answers to the two scored questions pertaining to training -- whether they had a training program for records management staff, and whether they had a training program for all staff and contractors.

Findings

- The data has not changed significantly in some areas in this section over the previous RMSAs. We continue to see that agencies generally designate a Records Officer (RO), establish a network of Records Liaison Officers (RLOs), and develop and update a program directive;
- However, we also continue to see that agencies are not developing internal, agency-specific training to the extent that they should, and training for senior officials continues to be a concern;
- There is a 12 percent increase in agencies that said they updated their records management policy directives in the last year; and
- Eighty percent (192 of 241) of the respondents reported they have a network of employees in program areas with records management responsibilities. Of the remaining 20 percent, half (24 of 49) said they do not have this network because they are micro-agencies with less than 100 FTE.

Analysis

Records Management Roles and Responsibilities / Directives

The percentage (80%) of agencies reporting that they have a designated person with overall authority and responsibility for the records management program and a network of employees in program areas with records management responsibilities remains relatively stable. Ten percent of the respondents who said they do not have a network of records liaisons are micro-agencies, and we recognize that it may not be practical or possible for some of these very small agencies to have such a network. Similar to previous years, over 90 percent of the respondents said they have a records management directive as required by 36 CFR 1220.34(c). Just over half said they updated their directive within the last year. This represents an increase of approximately 12 percent over the 2011 RMSA data.

Records Management Training

Training is an important part of a functioning records management program. The recently issued Managing Government Records Directive³ states that “all Federal agencies must establish a method to inform all employees of their records management responsibilities in law and policy, and develop suitable records management training for appropriate staff” by the end of 2014. This aligns with existing requirements in 36 CFR 1220.34(f) concerning training for all employees on their records management responsibilities. The regulations also specify that agencies must, “[w]hen a new or revised records schedule is issued, provide specific guidance to employees responsible for applying the schedule.” (36 CFR 1224.10(e)).

This year we included questions about training for staff with assigned records management duties, all staff and contractors, and senior and appointed officials. We asked agencies to provide numbers of FTE with records management responsibilities that they trained, and a total count of the employees and contractors (with and without assigned records management duties) that they trained. We also asked respondents to provide documentation of their training curricula for these two questions. This year we did not ask for documentation of training provided to senior and appointed officials. Since the first RMSA in 2009, the responses to the training questions have not varied more than a few percentage points.

At the end of each section this year, we allowed agencies the opportunity for open-text response. The survey also included an Optional Comments section where respondents could describe major challenges in implementing their programs. Training was a popular topic. One agency cited its successful training initiative: “We offer training to new officials and existing staff once [a] month with combined sessions for one day on Ethics, FOIA, and Records Management.” But more often agencies raised the difficulties in implementing effective training programs, especially when it comes to senior officials.

These have been recurring themes, but we are encouraged by some of the training initiatives described by respondents. We also believe the Managing Government Records Directive, which includes specific mandates for NARA and Federal agencies concerning training activities, will make a positive difference.

³ <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

SECTION TWO: RECORDS MANAGEMENT PROGRAM

OVERSIGHT AND COMPLIANCE

This section looks at how agencies monitor and assess the activities of their records management programs. 44 U.S.C. Chapter 31 and 36 CFR 1220.30(c)(1) require agencies to establish effective controls over the creation, maintenance, and disposition of records in all formats. OMB Circular A-123 requires agencies to develop and implement appropriate, cost-effective management controls for their programs and operations.

There are 11 questions in this section. Agencies were required to submit documentation to support their answers to questions 15 (evaluations/inspections/audits), 16 (performance goals), and 17 (performance measures).

Findings

- Nearly half of the respondents reported that they have performance goals and measures for their programs; this is a 17% increase over last year;
- Nearly a third of the respondents answered that they are in the process of developing such measurements;
- A number of records officers lack a clear understanding of internal controls, performance goals, and performance measures in the context of Federal records management; and
- More than half of agencies update their vital records plan annually, which is an increase of 16% over 2011.

Analysis

Internal Controls

Internal controls are a series of ongoing actions and activities that are integral to a records management program. Control activities are policies, procedures, techniques, and mechanisms that enforce records management directives. We asked agencies if, in addition to their policies and records schedules, they had established controls to ensure that permanent records are transferred to NARA and to prevent the premature destruction of records and information. We also asked agencies to describe how they test their controls to ensure their effectiveness.

The number of agencies indicating they have controls in place increased modestly since the last self-assessment. Some agencies described robust activities and practices such as clearly defined roles and responsibilities and controlled access to records and records storage areas. However, many other agencies simply cited their records schedules as their internal control. In order for a records schedule to be an effective control, an agency must implement checks and other control

mechanisms to verify that it is being implemented correctly, routinely, and consistently across the enterprise.

In numerous cases, agencies appear to be following rote checklists that neither reflect real risk assessment nor lead to the implementation of appropriate controls based on those risks. We also found that few agencies test their controls. Without regular testing, agencies cannot ensure that their controls are effective or that they provide reasonable assurance that the program is compliant with Federal laws and regulations.

Evaluations, Inspections, and Audits

One way for agencies to monitor their internal controls is to conduct regular audits or evaluations. We asked agencies if they conduct these activities. This year, the percentage of respondents that answered “yes” to this series of questions (76%) increased slightly over last year. The percentages of agencies that stated they had conducted an evaluation in the past year and prepared a written report increased substantially (increases of 22% and 16% respectively) over last year. However, we asked respondents to submit copies of their evaluation/inspection/audit reports for our document review process, and we found that more than half of the submissions did not conform to our criteria.⁴

Performance Goals and Measures

We defined performance goals as the end-state outcomes that a records management program strives to achieve in a given period of time (fiscal year, etc.), in other words the agencies’ ambitions for the program. We defined performance measures as the indicators or metrics against which a program’s performance can be gauged. Performance measures should help an agency assess its progress towards achieving its performance goals. We asked agencies if they have established performance goals and three or more performance measures for their records management programs. Agencies answering “yes” were required to submit documentation of those goals and measures.

Nearly half of the respondents reported that they have performance goals and measures for their programs. This is a significant increase of approximately 17% over last year. More encouragingly, nearly a third of the respondents answered that they are in the process of developing such measurements. A few agencies commented that they have developed, or are developing, maturity models to use to assess the state of their programs and identify markers, analogous to goals and measures, to achieve a high-functioning state. These agencies clearly understand the value of having ways to gauge their programs.

We saw in our document review, however, that there are gaps in some respondents’ understanding of what constitutes performance goals and measures. In some cases, agencies have

⁴see Appendix III: Document Review Criteria for a list of the criteria we provided to agencies at the start of the survey

established one but not the other. In other cases agencies have both goals and measures, but there appears to be no linkage between the two. Some documentation the agencies provided appeared to be compilations of statistics, for example the number of boxes transferred to the Federal Records Center in some period of time, without a defined goal or objective linked to them.

Vital Records

The final questions in this section were about agencies' vital records programs. The data for these questions is essentially unchanged from previous RMSAs. The single difference this year is that more agencies (61%) are updating their vital records plans annually. This is up by a significant 17 percent over FY 2011.

SECTION THREE: RECORDS MANAGEMENT PROGRAM

RECORDS DISPOSITION

Agencies with an effective records disposition program manage their records by maintaining current records schedules, ensuring proper storage, and providing for prompt final disposition. 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.

We designed the five scored questions in this section to gather information on agencies' implementation of their records schedules and on their oversight of how senior-level officials handle their records. Agencies had to submit additional documentation if they responded affirmatively to two of these questions.

Findings

- The data for permanent records transfers shows some improvement over previous RMSAs; however considering the importance of this activity, the percentages of agencies that said they do not transfer eligible permanent non-electronic (28%) or electronic (54%) records remains a serious concern; and
- Agencies reported some improvement in their oversight of senior-level officials' handling of records.

Analysis

Implementing Schedules

While the data shows some signs of improvement over previous years, many agencies still do not transfer eligible permanent records to NARA according to their approved records schedules. Two thirds of respondent agencies report that they transfer eligible permanent non-electronic records to the National Archives, but fewer than half (41%) report that they transfer eligible permanent electronic records.

The percentages of agencies answering “yes” to question 22a (“does your agency transfer eligible permanent non-electronic records to the National Archives”) and 23a (“does your agency transfer eligible permanent electronic records to the National Archives”) have increased 27 percent and 22 percent respectively over last year. It is important to note, however, that changes in the wording of these questions from last year likely account for much of this increase. In previous RMSAs we asked agencies if they transferred permanent records to NARA during the prior fiscal year. This year we revised the question and asked if they transfer records to NARA as a general practice, according to their NARA-approved records schedules, not if they have done

so in the last fiscal year. The new wording allows for a more accurate picture of agencies' efforts to comply with regulations as it does not penalize those that may not have had permanent records recently eligible for transfer.

The percentage of agencies answering “no,” particularly in regard to electronic records, remains high. Some agencies commented that they do not have the processes in place to identify, capture, and transfer permanent records in either electronic or non-electronic formats. Others report that they have potentially permanent records that are not currently covered by NARA-approved records schedules. Moreover, in our document review for these questions, about a third of the respondents provided materials that did not support their answers concerning permanent records transfers.⁵ Some provided transfer documentation that could not be verified against NARA tracking, and a few submitted materials that pertained to entirely different processes – records center transfers involving agency-owned, temporary records, for example.

Overseeing Senior-Level Officials' Handling of Records

This year 63 percent of the agencies report that they require “exit briefings for senior officials on the appropriate disposition of records” (question 24). This is an increase of 14 percent over last year, indicating an elevated awareness of the importance of this activity. Nearly all (90%) of the respondents who answered “yes” to this question also said they document exit briefings (question 25).

Seventy-one percent of respondents report that they require senior officials to obtain approval from records management program staff or other designated official(s) before removing personal papers and copies of records (question 26). This figure has increased slightly (5%) from last year. Although the increase is small, it may indicate improving awareness of the importance of implementing safeguards to prevent intentional or unintentional alienation of Federal records.

⁵see Appendix III: Document Review Criteria

SECTION FOUR: RECORDS MANAGEMENT PROGRAM

ELECTRONIC RECORDS

This section addresses how agencies manage their electronic records in compliance with 36 CFR 1236. The regulations require agencies to integrate records management and preservation considerations into the design, development, and implementation of electronic information systems; establish controls for electronic information systems; design and implement migration strategies; and retain and manage e-mail records.

This section contains 12 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. Agencies were required to submit documentation to support their answers to questions 29 (electronic systems inventory) and 34 (e-mail retention policies and procedures).

Findings

- Similar to last year, approximately two-thirds of respondents report that their agencies integrate records management controls into new and existing systems, maintain electronic records inventories that include scheduling information, conduct agency-wide training in electronic records management, and train staff on the preservation of electronic mail records;
- Many agency records management staff (64%) report that they are participating in the design and development of electronic systems, though we continue to see organizational barriers to improvement here including lack of senior management support and a disconnect with IT staff;
- Nearly 20 percent more agencies report having procedures for the migration of records and related metadata in 2012 than in 2011;
- Agencies use a variety of methods to integrate records management functionality into electronic systems; and
- As noted last year, agency records management staff require better education and training in the management of electronic records. A number of respondents were unable to answer, or did not understand, several questions.

Analysis

Agency responses to the majority of questions in this section are similar to what we saw in 2011. Our findings related to the integration of records management controls into new and existing systems, electronic records inventories that include scheduling information, agency-wide training in electronic records management, and training for staff on the preservation of electronic mail

records remain largely unchanged from last year. The Managing Government Records Directive⁶ highlights the need for agencies to increase their electronic records management activities. It states that agencies must manage their permanent records electronically “to the fullest extent possible” by December 31, 2019. It also requires agencies to manage their e-mail records in an electronic format, in appropriate electronic systems, by December 31, 2016. Agencies will be required to report annually on their progress towards achieving these goals.

Preservation of Electronic Records in a Usable Format

We do see a difference in the data from earlier RMSAs concerning the migration of electronic records for their preservation in a usable format. Migration is necessary to ensure that electronic records are retrievable and maintain their integrity for agency business needs over the long term. We asked if agencies had procedures for the migration of records and related metadata, and 60 percent of agencies answered “yes”; this is an encouraging increase of 20 percent over the 2011 data. Only 11 percent could not answer this question, compared to 19 percent in 2011.

Integration of Records Management Controls into New and Existing Systems

We also asked whether records management functionality is incorporated into the design, development, and implementation of electronic information systems, and the percentage of positive answers here is similar to 2011 (57% in 2012; 55% in 2011). Thirty agencies (12%) answered “do not know” to this question.

This year we included a follow-up question, for those who answered “yes”, asking how they ensure this functionality. The survey allowed for open-text response. Approximately forty percent reported that records management staff is involved in the decision-making process for electronic systems. They have an active role in meetings with Information Technology (IT), acquisition/procurement, and program staff; are part of working groups and review boards; develop system checklists and requirements documents; and work cooperatively with the agency’s Chief Information Office and program staff. Agency comments indicate that in many cases, records management participation is an effective method towards ensuring the integration of records management requirements as agencies develop new systems. A few agencies commented that cost considerations take precedence over records management requirements.

Nearly a quarter of the respondents commented that they have policies and procedures, often codified in orders and directives, requiring records management functionality. Records staff use questionnaires and checklists as implementation tools for these policies and procedures. In some cases, agencies commented that although a records management plan is included as part of the project plan template in their guidance, they do not have implementation guidance in place for the development and review of these plans. A number of agencies (about 20%) said that records management staff is involved in the System Design Life Cycle (SDLC) process, and a slightly

⁶ <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

lower percentage (about 15%) said they are involved in the Capital Planning and Investment Control (CPIC) process. Many said they utilize checklists for these activities as well. Seven percent of the agencies said they rely upon their Electronic Records Management Systems (ERMS) or Records Management Applications (RMA) to ensure records management functionality. A small percentage (less than 5%) of agencies state that records management staff approve, certify, or verify new systems.

The slow or inconsistent adoption of electronic recordkeeping solutions is an area of increasing concern, which we address in our recommendations (see Appendix I) and which is a major focus of the Managing Government Records Directive. One initiative in the Directive, aimed to support implementation of technological solutions, is for NARA to work with stakeholders to research automated technologies to reduce the burden of records management on individuals.

We asked a related question about whether agency records management staff participate in the design, development, and implementation of new electronic systems. Again, the response was similar to 2011 (64% said “yes” in 2012; 58% said “occasionally”, “most of the time”, or “always” in 2011). We asked those agencies that answered “no” to explain why they do not participate. A third said that collaboration was under development and that they are working on policies and procedures to accomplish this practice. Others cited a number of reasons for the lack of participation: lack of upper management support, lack of expertise, no new systems under development, and agency reorganization were listed most often. Many agencies said that they were not invited to meetings with IT and program staff or were otherwise excluded in the design and development of new systems. Except for one respondent who said the process had not changed despite numerous discussions with IT, most did not indicate whether or not records management staff had taken an active role in trying to work with IT.

Electronic Records Scheduling

Agencies continue to make progress – however slowly – on scheduling their electronic records. The number of agencies that reported maintaining an inventory of their electronic systems, and that link those systems to a NARA-approved records schedule, has risen this year to 166 from 141 in 2011. We asked agencies to send an inventory or list of their systems, the scheduling status for each, and the date of the inventory. Just under half (43%) of these 166 agencies either did not provide any documentation or submitted materials that did not meet our criteria.⁷ A number of agencies sent their records schedules, for example, and one sent their COOP plan.

Preservation of Electronic Mail Records

The portion of agencies that report having policies and procedures for e-mail records with a retention period longer than 180 days remains unchanged at about two-thirds (68%). We requested that agencies that answered “yes” to this question send a copy of their policies and

⁷see Appendix III: Document Review Criteria

procedures, and we listed five elements that should be covered in those documents (see Appendix III: Document Review Criteria). Of those who provided documentation, 57 percent sent materials that met our criteria. The other 43 percent sent either no documentation, high level policy that did not address the specific elements in our criteria, or other unrelated documentation such as a copy of their file plan or records schedule. One sent a copy of a NARA guidance document on e-mail archiving applications.

In conclusion, incremental progress is being made by agencies in some areas of electronic records management, particularly system migration and records management participation in new system design and development. Records staff in more agencies are working collaboratively with other units in their agencies and are involved with the SDLC and CPIC processes. Agencies employ multiple and varied methods to integrate records management functionality into electronic systems. An increasing number of agencies are developing policies and procedures to include records management in future system design and development, and this is encouraging.

In some agencies, however, the records management program lacks senior management support and is not recognized as an essential player in the system development process. It is critical that the SAO change this perception by elevating the records management program's role in the system development process. The education and training of records management staff in electronic records issues remains a concern based on the percentage of agencies who could not answer a number of questions, agency comments, and the documentation submitted for our review process. The issues will only compound as the volume of electronic records grows and technology proliferates. We see recognition among the Federal records management community that these challenges must be addressed, and we also see that some efforts are being made.

The requirements in the Managing Government Records Directive add to the urgency and provide a framework for agencies to maintain this progress. For example, the establishment of a formal records management occupational series within the Federal Government that outlines roles, responsibilities, and skill sets coupled with electronic records training should address some of these issues over time. Also, NARA's forthcoming e-mail and format transfer guidance will help agencies to better manage their permanent e-mail records and other electronic records.

OPTIONAL QUESTIONS

This year, we added three optional questions with open-text response fields at the conclusion of the self-assessment. We asked agencies to detail the challenges they face in establishing a compliant records management program, and we also wanted to give them the opportunity to tell us about any initiatives they had undertaken, or changes they had made, that were not covered by the self-assessment. Lastly, we solicited feedback on how we could improve future RMSAs. The responses were free-form (as we asked for), varied widely in the topics addressed, and overall were interesting and informative. NARA will use the responses as we consider future RMSAs and other projects.

As we've seen in past self-assessments, agencies identify three main challenges to establishing a compliant records management program: lack of senior level support; lack of resources (e.g., personnel); and lack of funding. Records management staff must find creative ways to make use of their limited resources. The Managing Government Records Directive⁸ addresses the issue of senior level support at least in part, by requiring agencies to designate a senior agency official to “supervise the review” and activities involved in complying with other requirements of the Directive. The SAO must recognize the needs and support the efforts of the Agency Records Officer to improve the records and information management program, implement the Directive elements, and to generally meet agency mission requirements. Respondents also cited burgeoning records management program requirements and the difficulties in overseeing records management activities in multiple – and sometimes global – locations.

While agencies face numerous challenges, we found that many continue to move ahead to improve their programs. A few agencies are overhauling their records management programs from the ground up. Several agencies disclosed numerous initiatives that focused on managing their electronic information. These include developing policies and procedures for using shared drives, establishing agency-wide working groups to address electronic records issues, and implementing electronic records management systems. Other agencies are working to identify and transfer their permanent records to NARA. Still others are converting their current records schedules to more user- and technology-friendly big bucket schedules.

These are all encouraging developments. A number of mandates in the Managing Government Records Directive should bolster these and other agency initiatives. NARA will develop new e-mail and electronic records transfer format guidance by the end of 2013. NARA will collaborate with the Federal Chief Information Officers Council and the Federal Records Council to identify and support automated solutions for managing digital record content by the end of 2013. Finally,

⁸ <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

agencies must submit annual reports to NARA on their cloud computing activities and records storage solutions.

The last optional question asked agencies for feedback on how NARA can improve the self-assessment. Some respondents requested additional information about the purpose of the survey. Others urged NARA to distribute the self-assessment every other year rather than annually to allow records officers more time to vet proposed changes and action items through their bureaucracy. Several agencies asked for more opportunity to explain their answers. And some urged that the questions remain static and unchanging over time to better enable them to measure progress from year to year. NARA appreciates this feedback and will examine it closely prior to preparing for future self-assessments.

APPENDIX I

RECOMMENDATIONS FOR EXECUTIVE ACTION

On August 24, 2012, the Office of Management and Budget (OMB) and NARA issued the Managing Government Records Directive.⁹ Part I of the Directive pertains to Federal agency requirements (Part 2 sets out the role of oversight agencies – NARA, OMB, and Office of Personnel Management (OPM) – in this initiative) and sets forth two goals. The first requires agencies to work towards implementing electronic recordkeeping by 2019. It includes firm timeframes for agencies to manage all permanent electronic records in an electronic environment (2019) and all e-mail records in an electronic environment (2016). The second goal states that agencies must demonstrate compliance with Federal records management laws and regulations especially those covering agency responsibilities for identifying and transferring permanent records, scheduling all their records, and certain requirements pertaining to records management training. The initial, fundamental step in achieving these goals was the designation by each agency of a Senior Agency Official (SAO), at the level of Assistant Secretary or equivalent. This person is responsible for meeting the overall requirements of the Directive and ensuring the compliance and the success of the agency records management program.

The following recommendations, many of which carry over from previous self-assessments, support the goals and targets established in the Directive. They expand the Government's records management function to include a framework for governance, organization, and performance through collaboration among NARA and Federal agencies.

The role of the Senior Agency Official is critical

- SAOs must take responsibility to ensure that all parts of their agency understand the importance of effective records and information management in meeting mission needs.
- The SAO must also ensure compliance with records management regulations and policies is required throughout the organization.
- SAOs must ensure that their agency deploys the resources required to meet the broader Directive goals and ensure that their Agency Records Officer and general records and information staff members have the support needed to carry out their responsibilities.

⁹<http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

Records Management Activities

- Agencies must develop agency-specific records management training for employees at all levels of the organization.

Oversight Activities

- Agencies should establish performance goals for their records management programs that are specific, measurable, achievable, relevant, and time-bound;
- Agencies' records management programs should establish performance measures that enable them to track their progress towards achieving their performance goals; and
- Agencies should conduct risk assessments of their records management programs to identify what types of internal controls are necessary, and regularly monitor and test the controls to ensure their efficacy and currency.

Records Disposition

- Agencies should identify and schedule permanent records and ensure all eligible permanent records 30 years or older are transferred to NARA;
- All agency records must be scheduled in accordance with 36 CFR Part 1224; and
- Agency records officers should initiate and establish collaborative relationships with program management and IT staff and with NARA experts to facilitate the transfer of permanently valuable electronic records to the National Archives.

Electronic Records

- Agencies should continue to pursue technological solutions to electronic recordkeeping and engage in efforts by NARA and other oversight entities to meet the goals in the Managing Government Records Directive in this area;
- According to OMB Circular A-130, "Management of Federal Information Resources," and other guidance agencies must 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;
- Agencies must recognize that electronic recordkeeping is a joint responsibility of records management and IT staff;

- Agencies must require staff with records management responsibilities to attend basic electronic records training on an annual basis;
- Agencies must ensure that official e-mail messages are preserved in appropriate recordkeeping systems; and
- Agencies must maintain records in usable formats throughout their lifecycle to comply with 36 CFR 1236.

APPENDIX II

2012 RECORDS MANAGEMENT SELF-ASSESSMENT QUESTIONNAIRE

This version of the questionnaire is provided with charts indicating percentages and response counts per answer options based on the number of respondents.

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 | 99% | 239 |
| No | 1% | 2 |
| <i>Number of respondents answering this question</i> | | 241 |

2. If Yes: Please provide the person's name, their position title, and office.

| 3. Does your agency have a records management directive(s)? (36 CFR 1220.34c) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 91% | 220 |
| No | 9% | 21 |
| <i>Number of respondents answering this question</i> | | 241 |

| 4. When was your agency's directive(s) last updated? | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| FY 2011 – present | 52% | 115 |
| FY 2009 – 2010 | 22% | 49 |
| FY 2006 – 2008 | 12% | 27 |
| FY 2005 or earlier | 12% | 26 |
| Do not know | 2% | 4 |
| <i>Number of respondents answering this question</i> | | 221 |

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

| 5. Does your agency have a network of designated employees within each program and administrative area who are assigned records management responsibilities? These individuals are often called Records Liaison Officers (RLOs) though their titles may vary. (36 CFR 1220.34(d)) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 80% | 192 |
| No | 10% | 25 |
| No, micro agency (independent agency with less than 100 employees) | 10% | 24 |
| <i>Number of respondents answering this question</i> | | 241 |

For the following questions, formal records management training is the communication of standardized information that improves the records management knowledge, skills, and/or awareness 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.

| 6. Does your agency have an internal training curriculum, based on agency policies and directives, for employees assigned records management responsibilities? These individuals are often called Records Liaison Officers (RLOs) though their titles may vary. (36 CFR 1220.34(f)) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 76% | 146 |
| No | 20% | 39 |
| No, micro agency (independent agency with less than 100 employees) | 4% | 8 |
| <i>Number of respondents answering this question</i> | | 193 |

6a. If Yes: Please send a copy of your training curriculum for employees assigned records management responsibilities to rmsselfassessment@nara.gov.

7. If Yes: Please state the number of employees assigned records management responsibilities trained during FY 2011. NOTE: Do not include the number of employees who attended NARA’s records management training workshops, whether the workshops were part of NARA’s standard or customized training curriculum for your agency, in your answer.

| 8. Has your agency developed internal, staff-wide formal training - based on agency policies and directives - which helps agency employees and contractors fulfill their recordkeeping responsibilities? (36 CFR1220.34(f)) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 68% | 164 |
| No | 21% | 50 |
| No, micro agency (independent agency with less than 100 employees) | 11% | 27 |
| <i>Number of respondents answering this question</i> | | 241 |

8a. If Yes: Please send a copy of your records management training curriculum for all staff and contractors to rmsselfassessment@nara.gov.

9. If Yes: Please state the number of your agency's employees and contractors trained during FY 2011? *NOTE: Do not include the number of employees who attended NARA's records management training workshops, whether the workshops were part of NARA's standard or customized training curriculum for your agency, in your answer.*

Employees _____

Contractors _____

| 10. Does your agency <u>require</u> that all senior officials and appointed officials - including those incoming and newly promoted - receive training on the importance of appropriately managing records under their immediate control? (36 CFR 1220.34(f)) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 63% | 153 |
| No | 32% | 77 |
| Do not know | 5% | 11 |
| <i>Number of respondents answering question</i> | | 241 |

Additional comments (Optional)

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))

Internal controls are integral components of an organization’s management that provide reasonable assurance that the following objectives are being achieved: effectiveness and efficiency of operations; reliability of financial reporting; and compliance with applicable laws and regulations. (“Standards for Internal Control in the Federal Government” (AIMD-00-21.3.1), General Accountability Office standards document, November 1999, available via <http://www.gao.gov/products/AIMD-00-21.3.1>)

In other words, internal controls are ongoing tasks and activities (training, oversight, reviewing, analyzing, reporting, and measuring) that your agency’s records management program performs that help it assess whether the program is effective.

| 11. <u>In addition to your agency’s established records management policies and records schedules, has your agency’s records management program developed and implemented internal 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))</u> | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 59% | 143 |
| No | 38% | 90 |
| Do not know | 3% | 8 |
| <i>Number of respondents answering this question</i> | | 241 |

11a. If Yes: Describe in detail the internal controls your agency’s records management program has implemented to ensure that all eligible permanent records in all media are transferred to NARA according to your agency’s records schedules. Include in your description how these controls are tested for effectiveness as well as how frequently they are tested.

| 12. <u>In addition to your agency’s established policies and records schedules, has your agency developed and implemented internal controls to ensure that Federal records are not destroyed before the end of their retention period? (36 CFR 1222.26(e)) These controls must be internal to your agency. Reliance on information from external agencies (for example, NARA’s Federal Records Centers) or other organizations will not be considered an affirmative response for this question.</u> | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 63% | 153 |
| No | 32% | 76 |
| Do not know | 5% | 12 |
| <i>Number of respondents answering this question</i> | | 241 |

12a. If Yes: Describe in detail the internal controls your agency’s records management program has implemented to ensure that Federal records are not destroyed before the end of their retention period. Include in your description how these controls are tested for effectiveness as well as how

frequently they are tested.

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.

| 13. Does your agency conduct evaluations/inspections/audits of its records management program, or an element of the program (e.g., records scheduling, records management training) to ensure that it is efficient, effective, and compliant with all applicable records management laws and regulations? (36 CFR 1220.34(j)) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 76% | 182 |
| No | 15% | 37 |
| No, micro agency (independent agency with less than 100 employees) | 9% | 22 |
| <i>Number of respondents answering this question</i> | | 241 |

| 14. When was the most recent evaluation/inspection/audit conducted? | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Less than 1 year ago | 67% | 124 |
| 1 – 3 years ago | 23% | 43 |
| 3 – 5 years ago | 9% | 16 |
| More than 5 years ago | 1% | 1 |
| Do not know | <1% | 1 |
| <i>Number of respondents answering this question</i> | | 185 |

| 15. Was a written report prepared after the evaluation/inspection/audit was completed? | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 80% | 147 |
| No | 18% | 34 |
| Do not know | 2% | 4 |
| <i>Number of respondents answering this question</i> | | 185 |

15a. If Yes: Please send a copy of any such evaluation/inspection/audit (whether conducted by your OIG, independent contractor, or program staff) report to rmsselfassessment@nara.gov. If the evaluation/inspection/audit was completed prior to FY 2011, please include a list of evaluation/inspection/audit recommendations that remain open and their expected completion date. *NOTE:* The report must include the dates of the evaluation/inspection/audit. Edited reports will be accepted if they contain sufficient information for NARA to assess their contents.

An essential control for any RM program is the establishment of performance goals and associated performance targets and performance measures.

Performance goals are the end-state outcomes your agency's records management program wants to achieve for a fiscal year. They are the target levels of performance expressed as a measurable objective, against which actual achievement can be compared.

("Performance Measurement Challenges and Strategies", June 18, 2003, white paper associated with the Office of Management and Budget's Program Assessment Rating Tool (PART), available via http://www.whitehouse.gov/sites/default/files/omb/part/challenges_strategies.pdf)

| 16. Has your agency established performance goals for its records management program? | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 49% | 119 |
| No | 23% | 55 |
| Currently under development | 28% | 67 |
| <i>Number of respondents answering this question</i> | | 241 |

16a. Please send a copy of performance goals for your agency's records management program to rmsselfassessment@nara.gov.

Performance measures are the indicators or metrics against which program performance can be gauged. (“Performance Measurement Challenges and Strategies”, June 18, 2003, white paper associated with the Office of Management and Budget’s Program Assessment Rating Tool (PART), available via http://www.whitehouse.gov/sites/default/files/omb/part/challenges_strategies.pdf)

| 17. Has your agency’s records management program identified <u>3 or more</u> performance measures for records management activities such as training, records scheduling, permanent records transfers, etc.? | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 47% | 113 |
| No | 20% | 49 |
| Currently under development | 31% | 74 |
| Do not know | 2% | 5 |
| <i>Number of respondents answering this question</i> | | 241 |

17a. If Yes: Please send a copy of your agency’s records management performance measures to rmsselfassessment@nara.gov.

| 18. 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 1222.34e) | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 78% | 187 |
| No | 20% | 48 |
| Do not know | 2% | 6 |
| <i>Number of respondents answering this question</i> | | 241 |

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))

| 19. 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 | 78% | 188 |
| No | 14% | 34 |
| Do not know | 8% | 19 |
| <i>Number of respondents answering this question</i> | | 241 |

| 20. How often does your agency review and update its vital records inventory? (36 CFR 1223.14) | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Annually | 60% | 146 |
| Every 1 - 3 years | 18% | 43 |
| Every 4 - 6 years | 4% | 9 |
| Never | 6% | 14 |
| Do not know | 12% | 29 |
| <i>Number of respondents answering this question</i> | | 241 |

| 21. Is your vital records plan part of your agency's Continuity of Operations (COOP) plan? | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 83% | 201 |
| No | 11% | 26 |
| Do not know | 6% | 14 |
| <i>Number of respondents answering this question</i> | | 241 |

Additional comments (Optional)

Records Management Program - Records Disposition

A NARA-approved records schedule is one that has been signed by the Archivist of the United States.

| 22. As required by your agency's NARA-approved schedule, does your agency transfer eligible permanent non-electronic records to the National Archives via a signed SF-258 or approved for transfer in ERA? (36 CFR 1235.12) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 67% | 161 |
| No | 28% | 68 |
| Do not know | 5% | 12 |
| <i>Number of respondents answering the question</i> | | 241 |

22a. If Yes: Please send a PDF copy of your agency's most recent signed SF-258, or the Transfer Request (TR) number if the records were transferred in ERA, to rmsselfassessment@nara.gov.

| 23. As required by your agency's NARA-approved schedule, does your agency its transfer eligible permanent electronic records to the National Archives via a signed SF-258 or approved for transfer in ERA? (36 CFR 1235.12) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 41% | 98 |
| No | 54% | 131 |
| Do not know | 5% | 12 |
| <i>Number of respondents answering the question</i> | | 241 |

23a. If Yes: Please provide a PDF copy of your agency's most recent signed SF-258 or the Transfer Request (TR) number if they were transferred in ERA to rmsselfassessment@nara.gov.

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)

| 24. Are records management program staff required to conduct exit briefings for senior officials on the appropriate disposition of the records - including email - under their immediate control? (36 CFR 1230.10(a & b)) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 63% | 152 |
| No | 34% | 82 |
| Do not know | 3% | 7 |
| <i>Number of respondents answering the question</i> | | 241 |

| 25. Are the exit briefings documented for purposes of accountability? | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 90% | 137 |
| No | 8% | 12 |
| Do not know | 2% | 3 |
| <i>Number of respondents answering the question</i> | | 152 |

| 26. 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 | 71% | 171 |
| No | 25% | 60 |
| Do not know | 4% | 10 |
| <i>Number of respondents answering the question</i> | | 241 |

Additional comments (Optional)

Records Management Program - Electronic Records

An electronic information system is an automated system that contains and provides access to Federal records and other information—it captures (creates) information, but does not manage information through the lifecycle. (NARA records management training class: Electronic Records Management, Module 1)

Agencies must incorporate controls into the electronic information system or integrate them into a recordkeeping system that is external to the information system itself. (36 CFR 1236.10)

Migration is a set of organized tasks designed to achieve periodic transfer of digital materials from one hardware/software configuration to another, or from one generation of computer technology to a subsequent generation. (NARA records management training class: Electronic Records Management, Module 2.)

| 27. Has your agency incorporated/integrated controls to ensure the reliability, authenticity, integrity, and usability of agency electronic records maintained in electronic information systems? | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 67% | 162 |
| No | 23% | 55 |
| Do not know | 10% | 24 |
| <i>Number of respondents answering the question</i> | | 241 |

| 28. Does your agency have procedures for migrating 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 | 59% | 143 |
| No | 30% | 72 |
| Do not know | 11% | 26 |
| <i>Number of respondents answering the question</i> | | 241 |

| 29. Does your agency maintain an inventory of electronic information systems that indicates whether or not each system is/is not covered by an approved NARA disposition authority? (36 CFR 1236.26 (a)) | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 69% | 166 |
| No | 23% | 56 |
| Do not know | 8% | 19 |
| <i>Number of respondents answering the question</i> | | 241 |

29a. If Yes: Please send a copy of your agency’s most recent inventory of electronic information systems with the applicable disposition information to rmsselfassessment@nara.gov. *NOTE:* The copy you submit must include the date the inventory was last updated.

| | | |
|---|-------------------------|-----------------------|
| 30. 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 | 57% | 137 |
| No | 31% | 74 |
| Do not know | 12% | 30 |
| <i>Number of respondents answering the question</i> | | 241 |

31. If Yes: Describe in detail how your agency ensures that records management functionality is incorporated into the design, development, and implementation of electronic information systems.

| | | |
|---|-------------------------|-----------------------|
| 32. 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 |
| Yes | 64% | 154 |
| No | 30% | 72 |
| Do not know | 6% | 15 |
| <i>Number of respondents answering the question</i> | | 241 |

| | | |
|---|-------------------------|-----------------------|
| 33. Has your agency developed internal, staff-wide, formal training based on the agency's policies and directives, on the retention and management of records created and maintained in electronic formats? (36 CFR 1220.34(f)) Note: This training must be internal to your agency. NARA's records management training workshops, whether the workshops were part of NARA's standard curriculum or customized by NARA for your agency, should <u>not</u> be considered internal training. | | |
| Answer Options | Response Percent | Response Count |
| Yes | 59% | 143 |
| No | 30% | 72 |
| No, micro agency (independent agency with less than 100 employees) | 10% | 24 |
| Do not know | 1% | 2 |
| <i>Number of respondents answering the question</i> | | 241 |

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)

| 34. Does your agency have policies and procedures in place to handle email records that have a retention period longer than 180 days? (36 CFR 1236.22(c) and GRS 23, (7)) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 68% | 165 |
| No | 24% | 58 |
| Do not know | 8% | 18 |
| <i>Number of respondents answering the question</i> | | 241 |

34a. 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 rmsselfassessment@nara.gov.

| 35. Does your agency audit staff compliance with the agency's email preservation policies? | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 31% | 76 |
| No | 56% | 134 |
| Do not know | 13% | 31 |
| <i>Number of respondents answering the question</i> | | 241 |

| 36. How often does your agency audit staff compliance to the agency's email preservation policies? | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Every 6 months | 32% | 25 |
| Every year | 36% | 28 |
| Every 2 years | 6% | 5 |
| Less frequently than every 2 years | 14% | 11 |
| Do not know | 12% | 9 |
| <i>Number of respondents answering the question</i> | | 78 |

37. Has your agency developed internal, staff-wide training based on agency policies and directives, on the retention and management of email records? Note: This training must be internal to your agency. Reliance on NARA's records management training workshops, whether the workshops were part of NARA's standard curriculum or customized by NARA for your agency, should not be considered internal training. (36 CFR 1220.34(f))

| Answer Options | Response Percent | Response Count |
|--|-------------------------|-----------------------|
| Yes | 60% | 145 |
| No | 27% | 65 |
| No, micro agency (independent agency with less than 100 employees) | 10% | 23 |
| Do not know | 3% | 8 |
| <i>Number of respondents answering the question</i> | | 241 |

38. Is this training mandatory for all staff, including contractor staff and senior officials?

| Answer Options | Response Percent | Response Count |
|--|-------------------------|-----------------------|
| Yes | 73% | 109 |
| No | 25% | 37 |
| Do not know | 2% | 2 |
| <i>Number of respondents answering the question</i> | | 148 |

Additional comments (Optional)

Optional Questions

What are the major challenges you face managing and implementing your agency's records management program?

Have you undertaken any changes or initiatives to improve records management in your agency that are not covered by the questions and your responses to the self-assessment?

Do you have any suggestions for how we can improve future Records Management Self-Assessments?

Demographic Information

| 39. How many FTEs are in your agency/organization? (Choose one) | | |
|--|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| 500,000 or more FTEs | 3% | 4 |
| 100,000 – 499,999 FTEs | 2% | 6 |
| 10,000 – 99,999 FTEs | 21% | 51 |
| 1,000 – 9,999 FTEs | 31% | 75 |
| 100 – 999 FTEs | 29% | 70 |
| 1 – 99 FTEs | 13% | 32 |
| Not Available | 1% | 3 |
| <i>Number of respondents answering the question</i> | | 241 |

| 40. 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% | 55 |
| Program Managers | 34% | 82 |
| Information Technology staff | 58% | 139 |
| Records Liaison Officers or similar | 46% | 111 |
| Administrative staff | 33% | 79 |
| None | 17% | 42 |
| Other (please specify) | 25% | 61 |
| <i>Number of respondents answering the question</i> | | 241 |

| 41. 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 | 26% | 62 |
| More than 3 hours but less than 6 hours | 30% | 73 |
| More than 6 hours but less than 10 hours | 21% | 51 |
| Over 10 hours | 23% | 55 |
| <i>Number of respondents answering the question</i> | | 241 |

| 42. Are you the Records Officer? | | |
|---|-------------------------|-----------------------|
| Answer Options | Response Percent | Response Count |
| Yes | 82% | 198 |
| No | 18% | 43 |
| <i>Number of respondents answering the question</i> | | 241 |

Please provide your contact information.

Name:

Agency, Bureau, or Office:

Address:

Address 2:

City/Town:

State:

ZIP/Postal Code:

Email Address:

Phone Number:

What is your job title?

Are you the Records Officer?

Yes

No

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 information or a follow-up meeting to verify your responses. All documentation requested as part of this self-assessment should be sent to rmselfassessment@nara.gov.

APPENDIX III

*DOCUMENT REVIEW CRITERIA*¹⁰

The FY 2012 Records Management Self-Assessment (RMSA) contains 9 verification questions. If you answer yes to any of these questions you must submit documentation or supply additional information to support your answer. Listed below are the questions (in bold) and details about the type of information the documents must contain for us to verify your responses. Please submit only the requested documentation. Any documents not responsive to the questions will be returned to you without review.

Please note: All documents must be in PDF, MS Word, or Excel formats only. Do not send web links to the information.

6a. If Yes: Please send a copy of your training curriculum for employees assigned records management responsibilities to rmsselfassessment@nara.gov.

Training curriculum provided should indicate that the training covers:

- Basic records management definitions (record, non-record, permanent, temporary etc.)
- Describes their roles and responsibilities
- Directions on how to use resources and tools (schedules, manuals, file plans, etc.)
- Includes direction on management of e-mail records
- Provided contact information to assist them with follow-up questions

8a. If Yes: please send a copy of your training curriculum all staff and contractors to rmsselfassessment@nara.gov.

Training curriculum provided should indicate that the training covers:

- Basic records management definitions (record, non-record, permanent, temporary etc.)
- Describes their roles and responsibilities (staff and contractors)
- Directions on how to use resources and tools (schedules, manuals, file plans, etc.)
- Includes direction on management of e-mail records
- Provides contact information for RO and RLOs (if applicable)

15a. If Yes: Please send a copy of the evaluation/inspection/audit report, to rmsselfassessment@nara.gov.

¹⁰The criteria were sent to agencies two weeks prior to the start of the RMSA and again when the web tool opened.

Note: The report must include the dates of the inspection/audit. Edited reports will be accepted if they contain sufficient information for NARA to assess their contents.

The report should:

- Contain a general evaluation of a records management program (i.e. records are maintained, can be located, records/non-records/personal papers are maintained separately, permanent identified)
- Indicate whether or not the evaluated office/program complies with the agency's Records Management Program directive
- Include a discussion of electronic records and records of mixed media (AV, maps, charts etc.)
- Discuss records disposition
- Assess records storage issues (on-site and/or off-site)
- Include recommendations and mechanism to follow up on recommendations

For more information on conducting an evaluation see NARA publications Disposition of Federal Records and the Records Management Self-Evaluation Guide.

16a. If Yes: Please send a copy of your agency's records management performance goals to rmselfassessment@nara.gov

Performance goals:

- Should be specific to your agency's records management program;
- Can be near-term and long-term goals.
- Should include benchmarks and timeframes for completion.

17a. If Yes: Please send a copy of your agency's records management performance measures to rmselfassessment@nara.gov.

Note: number of FOIA requests answered will not be accepted as a program performance metric.

Performance measures should include such things as:

- Percentage of records scheduled/unscheduled
- Status of schedules
- Number of people trained/Number of training classes offered
- Number of offices with current vital records plans

Note: Performance measures should be linked to performance goals for the records management program.

22a. If Yes: Please send a PDF copy of the most recent signed SF 258, or the Transfer Request (TR) number if the records were transferred in ERA, to rmsselfassessment@nara.gov.

Information provided (SF-258 or TR #) must be of approved/completed transfers. Response will be valid if information submitted matches NARA records.

23a. If Yes: Please provide a PDF copy of the most recent signed SF 258, or the Transfer Request (TR) number if they were transferred in ERA to rmsselfassessment@nara.gov.

Information provided (SF-258 or TR #) must be of approved/completed transfers. Response will be valid if information submitted matches NARA records.

29a. If Yes: Please send a copy of your agency's most recent inventory of electronic information systems with the applicable disposition information to rmsselfassessment@nara.gov. The copy you submit should include the date the inventory was last updated.

The Inventory should:

- Contain the name and description of every electronic series or systems
- Include scheduling status (scheduled or unscheduled) for each series or system listed
- Indicate the date the inventory was created and/or updated

Note: a list with the total number of systems (no names or description) does not meet the validation standard. We require the scheduling status of each individual series or system.

For more information see NARA Bulletin 2010-02

34a. 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 rmsselfassessment@nara.gov.

Policy and procedures should include guidelines for the:

- Preservation of metadata including names of sender and all addressee(s) and data message was sent
- Preservation of attachments as part of the email or linked
- Retention of the intelligent or full names on directories or distribution lists (no nicknames)
- Ensure that calendars that meet the definition of a Federal record are also managed

- Agencies that maintain paper recordkeeping systems must print and file their electronic mail records with the related transmission and receipt data.

For more information see: NARA Bulletin 2011-03: Guidance Concerning the use of E-mail Archiving Applications to Store E-mail (December 30, 2010).

If you have any questions about validation questions and/or documentation, please contact Stephanie Fawcett at (781) 663-0124 or send an e-mail message to rmsselfassessment@nara.gov

APPENDIX IV

TOTAL SCORE BY RISK FACTOR

Low Risk

Department of Agriculture

| | |
|------------------------------|----|
| Farm Service Agency | 91 |
| Food and Nutrition Service | 97 |
| Foreign Agricultural Service | 91 |

Department of Commerce

| | |
|---|----|
| Bureau of Economic Analysis | 90 |
| National Oceanic and Atmospheric Administration | 90 |

Department of Defense

| | |
|------------------------------------|-----|
| Defense Information Systems Agency | 96 |
| Defense Security Service | 97 |
| Department of the Army | 90 |
| Department of the Air Force | 90 |
| Joint Chiefs of Staff | 91 |
| Missile Defense Agency | 100 |
| US African Command | 94 |

Department of Education

| | |
|------------------|----|
| Department Level | 91 |
|------------------|----|

Department of Health and Human Services

| | |
|--|----|
| Agency for Healthcare Research and Quality | 96 |
| Centers for Medicare and Medicaid Services | 94 |
| Food and Drug Administration | 91 |

Department of Homeland Security

| | |
|---|-----|
| US Citizenship and Immigration Services | 92 |
| US Secret Service | 100 |

Department of the Interior

| | |
|--|-----|
| Bureau of Indian Affairs | 94 |
| Bureau of Land Management | 91 |
| Bureau of Reclamation | 100 |
| Department Level | 96 |
| Office of Surface Mining Reclamation and Enforcement | 90 |
| Office of the Special Trustee for American Indians | 94 |

Department of Justice

| | |
|--|----|
| Executive Office for United States Attorneys | 98 |
|--|----|

Department of Labor

| | |
|---|----|
| Bureau of Labor Statistics | 93 |
| Department Level | 93 |
| Employment and Training Administration | 92 |
| Occupational Safety and Health Administration | 93 |
| Office of Administrative Law Judges | 91 |
| Office of the Assistant Secretary for Administration and Management | 92 |
| Office of the Inspector General Office of Legal Services | 90 |
| Office of the Solicitor | 94 |
| Office of Worker's Compensation Programs | 99 |
| Veterans Employment and Training Service | 99 |

Department of State

| | |
|------------------|-----|
| Department Level | 100 |
|------------------|-----|

Department of the Treasury

| | |
|---|-----|
| Alcohol and Tobacco Tax and Trade Bureau | 91 |
| Department Level | 94 |
| Internal Revenue Service | 99 |
| United States Mint | 97 |
| Department of Transportation | |
| Federal Railroad Administration | 93 |
| Independent Agencies | |
| Board of Governors of the Federal Reserve System and the Federal Open Market Committee | 96 |
| Farm Credit Administration | 100 |
| Federal Housing Finance Agency | 92 |
| Office of Personnel Management | 100 |
| US Environmental Protection Agency | 93 |
| US Government Accountability Office | 100 |
| US International Trade Commission | 94 |
| Moderate Risk | |
| Department of Agriculture | |
| Agricultural Marketing Service | 78 |
| Agricultural Research Service | 88 |
| Animal and Plant Health Inspection Service | 83 |
| Department Staff Offices | 73 |
| Economic Research Service | 85 |
| Food Safety and Inspection Service | 77 |
| Grain Inspection, Packers and Stockyards Administration | 86 |
| National Agricultural Statistics Service | 73 |
| National Institute of Food and Agriculture | 86 |
| Natural Resources Conservation Service | 65 |

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|--|----|
| Risk Management Agency | 88 |
| Rural Development | 68 |
| US Forest Service | 63 |
| Department of Commerce | |
| International Trade Administration | 62 |
| National Institute of Standards and Technology | 83 |
| National Technical Information Service | 87 |
| US Census Bureau | 66 |
| US Patent and Trademark Office | 65 |
| Department of Defense | |
| Defense Commissary Agency | 84 |
| Defense Finance and Accounting Service | 79 |
| Defense Intelligence Agency | 79 |
| Defense Threat Reduction Agency | 76 |
| Department of the Navy | 89 |
| US Marine Corps | 87 |
| National Reconnaissance Office | 64 |
| National Security Agency | 87 |
| Office of the Secretary of Defense | 87 |
| US Army Central Third Army | 73 |
| US Central Command | 82 |
| Department of Energy | |
| Bonneville Power Administration | 80 |
| Department Level | 76 |
| Energy Information Administration | 75 |
| National Nuclear Security Administration | 76 |
| Southeastern Power Administration | 78 |
| Southwestern Power Administration | 75 |

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|---|----|
| Western Area Power Administration | 87 |
| Department of Health and Human Services | |
| Centers for Disease Control and Prevention | 78 |
| Health Resources and Services Administration | 88 |
| Indian Health Service | 69 |
| National Institutes of Health | 83 |
| Office of the Secretary | 82 |
| Substance Abuse and Mental Health Services Administration | 64 |
| Department of Homeland Security | |
| Federal Emergency Management Agency | 74 |
| National Protection and Programs Directorate | 67 |
| US Coast Guard | 78 |
| US Immigration & Customs Enforcement | 60 |
| US VISIT | 70 |
| Department of the Interior | |
| National Business Center | 78 |
| National Park Service | 70 |
| US Fish and Wildlife Service | 61 |
| Department of Justice | |
| Federal Bureau of Investigation | 86 |
| Offices, Boards and Divisions | 86 |
| United States Marshals Service | 79 |
| Department of Labor | |
| Adjudicatory Boards | 78 |
| Employee Benefits Security Administration | 80 |
| Mine Safety and Health Administration | 88 |
| Office of Congressional and Intergovernmental Affairs | 74 |

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|--|----|
| Office of Federal Contract Compliance Programs | 88 |
| Office of Labor Management Standards | 67 |
| Office of Public Affairs | 81 |
| Office of the Chief Financial Officer | 77 |
| Wage Hour Division | 81 |
| Department of the Treasury | |
| Bureau of the Public Debt | 65 |
| Financial Management Service | 82 |
| Office of the Comptroller of the Currency | 70 |
| Department of Transportation | |
| Federal Highway Administration | 81 |
| Federal Motor Carrier Safety Administration | 87 |
| Federal Transit Administration | 66 |
| Maritime Administration | 75 |
| National Highway Transportation Safety Administration | 82 |
| Pipeline and Hazardous Materials Safety Administration | 73 |
| St Lawrence Seaway Development Corporation | 71 |
| Surface Transportation Board | 77 |
| Department of Veterans Affairs | |
| Veterans Health Administration | 76 |
| Executive Office of the President | |
| Council on Environmental Quality | 83 |
| Office of Management and Budget | 64 |
| Office of Science and Technology Policy | 74 |
| Independent Agencies | |
| Administrative Office of the US Courts | 79 |
| Agency for International Development | 88 |

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|--|----|
| Central Intelligence Agency | 81 |
| Chemical Safety and Hazard Investigation Board | 63 |
| Congressional Budget Office | 75 |
| Consumer Financial Protection Bureau | 65 |
| Federal Communications Commission | 86 |
| Equal Employment Opportunity Commission | 73 |
| Federal Trade Commission | 81 |
| Institute of Museum and Library Services | 61 |
| Millennium Challenge Corporation | 77 |
| National Archives and Records Administration | 70 |
| National Capital Planning Commission | 67 |
| National Labor Relations Board | 83 |
| National Mediation Board | 83 |
| National Science Foundation | 89 |
| Office of Navajo and Hopi Relocation | 61 |
| Office of the Director of National Intelligence | 87 |
| Office of the Special Inspector General for Afghanistan Reconstruction | 61 |
| Overseas Private Investment Corporation | 85 |
| Postal Regulatory Commission | 87 |
| Recovery Accountability and Transparency Board | 77 |
| Social Security Administration | 75 |
| Tennessee Valley Authority | 80 |
| United States Sentencing Commission | 78 |
| US Election Assistance Commission | 65 |
| US Nuclear Regulatory Commission | 84 |
| US Office of Government Ethics | 73 |
| US Securities and Exchange Commission | 70 |

High Risk

Department of Commerce

| | |
|--|----|
| Bureau of Industry and Security | 41 |
| Department Level | 47 |
| National Telecommunications and Information Administration | 37 |
| Department of Defense | |
| Army and Air Force Exchange Service | 38 |
| Defense Contract Audit Agency | 37 |
| Defense Contract Management Agency | 42 |
| Defense Logistics Agency | 50 |
| National Geospatial Intelligence Agency | 37 |
| Office of Inspector General | 53 |
| US Army Forces Command | 15 |
| US Army Installation Management Command | 39 |
| US Army Materiel Command | 21 |
| US Army Training and Doctrine Command | 45 |
| US European Command | 57 |
| US Northern Command | 58 |
| US Pacific Command | 34 |
| US Special Operations Command | 44 |
| US Transportation Command | 45 |
| Department of Energy | |
| Federal Energy Regulatory Commission | 56 |
| Department of Health and Human Services | |
| Administration for Children and Families | 56 |
| Administration on Aging | 51 |
| Department of Homeland Security | |
| Department Level | 59 |
| Federal Law Enforcement Training Center | 56 |

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|--|----|
| Transportation Security Administration | 40 |
| US Customs and Border Protection | 33 |
| Department of Housing and Urban Development | |
| Department Level | 38 |
| Office of Inspector General | 40 |
| Department of the Interior | |
| Bureau of Ocean Energy Management | 48 |
| Bureau of Safety and Environmental Enforcement | 45 |
| US Geological Survey | 54 |
| Department of Justice | |
| Bureau of Alcohol Tobacco Firearms and Explosives | 33 |
| Drug Enforcement Administration | 36 |
| Executive Office for Immigration Review | 44 |
| Federal Bureau of Prisons | 9 |
| Department of Labor | |
| Bureau of International Labor Affairs | 30 |
| Office of the Secretary | 55 |
| Women's Bureau | 40 |
| Department of Transportation | |
| Department Level | 45 |
| Federal Aviation Administration | 59 |
| Office of Inspector General | 58 |
| Research and Innovative Technology Administration | 48 |
| Department of Veterans Affairs | |
| Board of Veterans' Appeals | 26 |
| National Cemetery Administration | 32 |
| VA Enterprise Records Service | 52 |

Executive Office of the President

| | |
|--|----|
| Office of National Drug Control Policy | 50 |
| Office of the US Trade Representative | 59 |

Independent Agencies

| | |
|--|----|
| Advisory Council on Historic Preservation | 30 |
| American Institute in Taiwan | 50 |
| Armed Forces Retirement Home | 24 |
| Barry M. Goldwater Scholarship Foundation | 44 |
| Broadcasting Board of Governors/International Broadcasting Bureau | 37 |
| Commodity Futures Trading Commission | 39 |
| Court Services and Offender Supervision Agency | 53 |
| Court Services and Offender Supervision Agency/ Pretrial Services Agency | 30 |
| CPBSD Committee for Purchase From People Who Are Blind or Severely Disabled | 30 |
| Defense Nuclear Facilities Safety Board | 40 |
| Export Import Bank of the United States | 27 |
| Federal Election Commission | 21 |
| Federal Maritime Commission | 40 |
| Federal Mine Safety & Health Review Commission | 40 |
| General Services Administration | 56 |
| Government Printing Office | 6 |
| International Boundary and Water Commission (US/Mexico) | 41 |
| Japan US Friendship Commission | 18 |
| Library of Congress | 57 |
| Marine Mammal Commission | 55 |
| Morris K Udall Foundation | 46 |
| National Aeronautics and Space Administration | 46 |

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|--|----|
| National Endowment for the Arts | 34 |
| National Endowment for the Humanities | 6 |
| National Indian Gaming Commission | 56 |
| National Transportation Safety Board | 35 |
| Nuclear Waste Technical Review Board | 32 |
| Occupational Safety and Health Review Commission | 29 |
| Peace Corps | 33 |
| Pension Benefit Guaranty Corporation | 55 |
| Presidio Trust | 15 |
| Railroad Retirement Board | 31 |
| Selective Service System | 53 |
| United States Commission on Civil Rights | 54 |
| United States Institute of Peace | 0 |
| US Access Board | 48 |
| US African Development Foundation | 59 |
| US Commission of Fine Arts | 24 |
| US Merit Systems Protection Board | 27 |
| US Office of Special Counsel | 56 |
| US Tax Court, Public Files Section | 45 |

APPENDIX V

NON-RESPONDENT LIST

American Battle Monuments Commission

Appalachian Regional Commission

Corporation for National and Community Service

Delaware River Basin Commission

Department of Agriculture

Center for Nutrition Policy and Promotion

Department of Commerce

Economic Development Administration

Minority Business Development Administration

Department of Defense

Defense Technical Information Center

Joint Warfare Analysis Center

Personnel and Readiness Command

US Army Corp of Engineers

US Southern Command

US Strategic Command

Department of Justice

Office of Justice Programs

Department of Labor

Job Corps

Office of Disability Employment Policy

Office of the Assistant Secretary for Policy

Department of the Interior

Indian Arts and Crafts Board

Office of Natural Resources Revenue

Office of the Secretary

Department of the Treasury

Bureau of Engraving and Printing

Financial Crimes Enforcement Network

Department of Veterans Affairs

Veterans Benefit Administration

Federal Deposit Insurance Corporation

Federal Judicial Center

Federal Labor Relations Authority

Federal Mediation and Conciliation Service

Federal Retirement Thrift Investment Board

Harry S Truman Scholarship Foundation

Inter American Foundation

International Boundary and Water Commission (US/Canada)

James Madison Memorial Fellowship Foundation

National Credit Union Administration

US Consumer Product Safety Commission

US Court of Veterans Appeals

US Holocaust Memorial Council and Museum

US Small Business Administration

US Trade and Development Agency



NATIONAL
ARCHIVES

NATIONAL ARCHIVES *and*
RECORDS ADMINISTRATION