

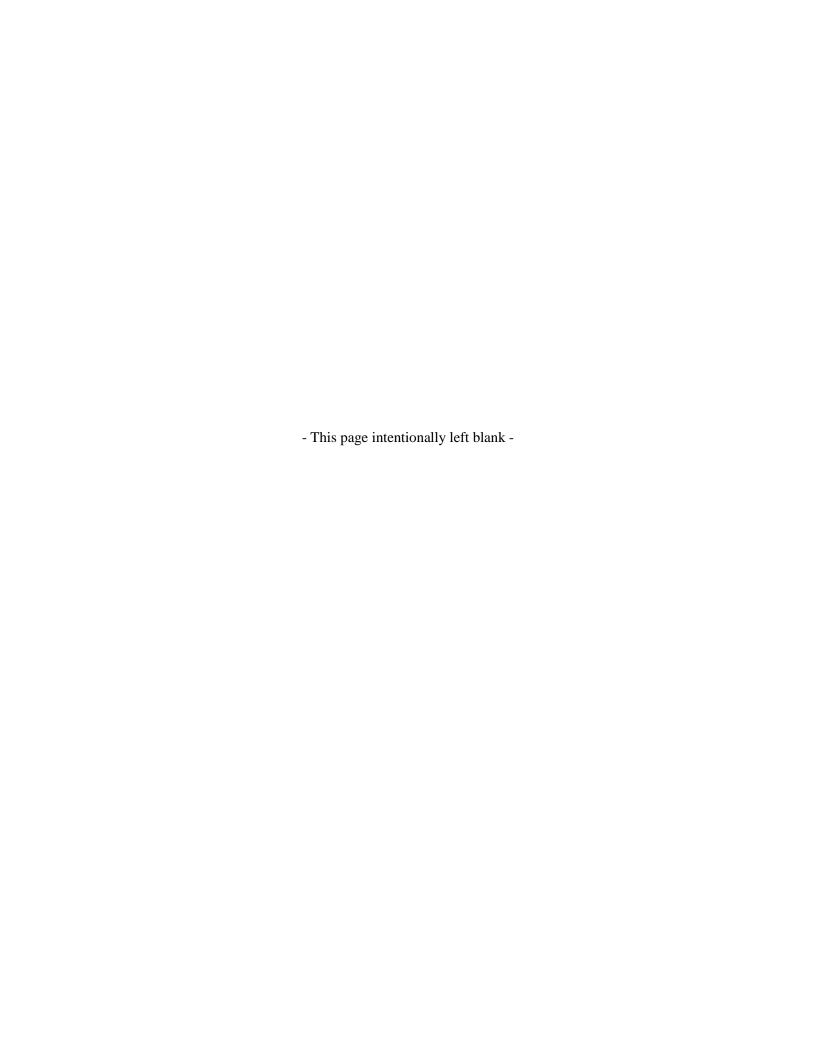
# 2010

## Records Management Self-Assessment Report

An Assessment of Records Management Programs in the Federal Government

**National Archives and Records Administration** 

**February 22, 2011** 



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#### **Executive Summary**

In May 2010, the National Archives and Records Administration (NARA) issued the mandatory annual records management self-assessment (RMSA) to Federal agencies, following the pilot self-assessment completed in 2009. The goal of the self-assessments is to determine whether Federal agencies are compliant with statutory and regulatory records management requirements. We are asking, in essence, if agencies are properly managing their records so they can: effectively and efficiently conduct their important business; protect the rights and interest of citizens; and identify, preserve, and transfer into the custody of the National Archives the permanently valuable records of the Federal Government.

Of the 270 agencies who received the self-assessment, 93 percent (251) responded, and 7 percent (19) failed to submit a response.<sup>1</sup> The responses indicate that many agencies are not managing the disposition of their records properly or, in some cases, they are saving their records but not taking the necessary steps to ensure that they can be retrieved, read, or interpreted.

There are fewer agencies this year that are considered low risk in regards to their compliance with Federal records management regulations and policies. NARA believes the difference between the 2010 and 2009 scores is a reflection of changes in the nature and number of the questions. We increased the number of questions overall, and we included more with multiple choice answers and reduced the opportunities for open text responses, which allowed us to gather more specific information. In addition to questions relating to agency records management programs, the 2010 RMSA included several questions pertaining to agency size and records management staffing levels.

The low, medium, and high rankings described in this report are only one indicator of an agency's compliance with Federal records management regulations and policies. NARA validated a number of agency responses to determine the reliability of the data. The validation process revealed a 25 to 27 percent error rate for several responses, which raises questions more about the accuracy of the scores for individual agencies than for the results of the overall survey.

Despite these questions about some individual agency scores, NARA is confident that the results of the 2010 RMSA paint a generally accurate picture of the state of Federal records management. We believe the RMSA serves as a baseline for evaluating records management within the Federal Government and provides a roadmap for its future. Agencies can use RMSA data to chart their own programs. NARA will use survey results in agency inspections. Taken together, data gleaned from the RMSAs and inspections will allow NARA and the Federal records management community to assess the effectiveness of current records management practices. We can begin the discussion of how well the Federal community identifies, manages, and preserves Federal records in an ever-changing business environment. As technology develops we need to utilize new tools and resources to support the critical functions of Government, and NARA's recent issuance of updated Web 2.0 and cloud guidance<sup>2</sup> are a first step in this process.

<sup>&</sup>lt;sup>1</sup> See Appendix IV for a list of non-responders.

<sup>&</sup>lt;sup>2</sup> See NARA Bulletin 2010-05: Guidance on Managing Records in Cloud Computing Environments (September 30, 2010) and NARA Bulletin 2011-02: Guidance on Managing Records in Web 2.0/Social Media Platforms (October 20, 2010), available via http://www.archives.gov/records-mgmt/bulletins/index.html.

#### **Key Findings**

Responses to the staffing questions included in this year's self-assessment point to what we see as the most significant issues in Federal records management as it is currently practiced. First, a very small number of individuals are given explicit or official responsibility for records management within the Federal Government. Within that small group, many have additional or primary duties not directly related to an agency's records management program. Second, perhaps the most pervasive issue that agency records officers face is the low priority senior officials place on allocating resources for records management.

We set up the RMSA questionnaire to capture data across six major topic areas: Records Management Program; Records Management Program - Activities; Electronic Records; Records Disposition; Records Management Training; and Vital Records. We also asked for demographic information from our respondents concerning their own position and job descriptions and the staffing of their records management program generally. For this report we break out this data and discuss it first, in the section Federal Records Management - Demographics. We discuss the specific findings highlighted below in more depth in each topical section, and we offer recommendations tied to each finding following the conclusion of this report.

#### Federal Records Management - Demographics

- A significant number of agencies:
  - Have a Records Officer (the main agency point of contact) who does not perform records management duties on a full-time basis; and
  - Do not have records management resources adequate for the size of the agency.

#### **Records Management Program**

- Agencies generally:
  - Designate a Records Officer (RO);
  - Establish a network of Records Liaison Officers (RLOs); and
  - Develop and update a program directive.
- However, a significant number of agencies:
  - Have an RO who does not perform records management duties on a full-time basis;
  - Designate RLOs yet do not include records management responsibilities in their position descriptions; and
  - Develop program directives but have not updated them in a number of years.

#### **Records Management Program - Activities**

- A majority of agencies reported that they perform the following:
  - Conduct program evaluations;
  - Perform records inventories; and
  - Develop file plans to manage active records.

#### **Electronic Records**

- The responses in this section indicate that records management programs in many agencies:
  - Do not ensure that e-mail records are preserved in a recordkeeping system;
  - Do not monitor staff compliance with e-mail preservation policies on a regular basis;
  - Have policies that instruct employees to print and file e-mail messages;
  - Consider system backups a preservation strategy for electronic records, not distinguishing between saving and preserving electronic records;
  - Consider compliance monitoring to be the responsibility of IT staff; and
  - Are rarely or not at all involved with, or are excluded from altogether, the design, development, and implementation of new electronic systems.

#### **Records Disposition**

- From the data in this section, we see that:
  - While most Federal agencies have a functioning records disposition program, a small minority have submitted no new or updated records control schedules within the past 10 years;
  - Although many Federal agencies have made measureable progress in scheduling their electronic information systems in recent years, less than half have met the goal of fully scheduling such systems for disposition;
  - Schedule implementation, in terms of systematically transferring permanent records to NARA, is inconsistent, particularly in the case of electronic data; and
  - A significant minority (41%) of Federal agency records management programs do not oversee records disposition by senior-level officials.

#### **Vital Records**

- The findings for this section show that a significant minority of agencies:
  - Either have not identified their vital records or do not know if they have been identified;
  - Continue to view the records management and continuity of operations (COOP) programs as unrelated;
  - Do not perform a required annual review of their vital records program; and
  - Provide limited training on vital records to records liaisons and emergency management staff.

#### **Training**

- In our special topic section, we determine from the RMSA data that:
  - Agencies rely heavily on computer-based training, internal web sites, and broadcast e-mails to provide training to employees;
  - Only a small percentage of respondents (14%, or 34 of 251) said they provide formal records management training to all staff, including new employees, records liaisons, contractors, and senior officials on all records management topic areas;
  - Most agencies use forms to evaluate the effectiveness of their training;

- A significant number of agencies do not include information in their training on implementing their records schedule;
- Agencies that don't provide training to their employees cite the lack of records management staff as their primary reason for not doing so, followed by lack of funding and resources; and
- Training for senior officials continues to be a concern in most agencies.

#### **Authority**

Federal records are national assets. They are essential to Government transparency and accountability, and the people who use Federal records – American citizens, Government officials, researchers – must have confidence in their integrity, authenticity, and reliability. Towards this ideal, a number of laws and regulations are in place to govern the creation, maintenance, and disposition of Federal records. Agency employees at all levels, and in all aspects of their work, are required to practice proper Federal records management. They have to document their actions (and by extension the actions of the Government), retain records in a usable format for as long as necessary, and ensure the preservation and availability of permanent records. Agencies must have robust records management programs, with leadership and support from senior officials, and professional staff and adequate resources, to help their employees do this.

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

#### **Background**

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

Each agency should use the results of its self-assessment as a starting place to improve its records management program, particularly in areas where the result indicates a high level of risk. The results can indicate the need to update existing policies and records schedules, or they may reveal where such policies do not exist at all. This assessment also highlights internal agency records management training needs and other areas that may need more collaboration between agencies, especially components of Cabinet-level agencies. NARA will use the RMSA data as one measure in determining agency compliance with records management regulations. NARA and agencies across the Government will use future self-assessments to build on this information.

#### Methodology

NARA revised and significantly expanded its self-assessment questionnaire in 2010. In preparation, we evaluated the 2009 survey to identify areas for further exploration, and reviewed the responses to identify questions that needed clarification. We also examined the updated records management regulations to see where new questions might be added.

We selected training as this year's special topic area, first of all because training provides the foundation for all effective records management practices. It is also a quantifiable element of a records management program – agencies can tell us what kind of training they conduct, how often they do it, and how many employees they train.

We held a focus group of Federal records officers to obtain feedback on the proposed questions. Following that session, we modified some questions and improved the communications strategy for announcing the self-assessment.

NARA informed agency heads by letter of the pending distribution of its mandatory self-assessment to Federal records officers. The letter advised agencies that a self-assessment would be distributed via a web link on May 17, 2010, and established a deadline for its completion of close of business on June 17, 2010. NARA sent the web link to 270 Federal records officers and received 251 responses -- a 93 percent response rate.

#### **Scoring**

Each of the questions in the self-assessment covers an aspect of an agency's records management program and practices. NARA did not grade agencies on any optional comments they provided, though they informed our analysis of the answers. We took agency responses at their face value and did not subtract points from questions even when the response appeared incorrect or when, in the case of the directives question (see Validation discussion below), the agency did not provide the required documentation.

We weighted the questions according to our judgment of their subject's importance within an agency's records management regimen. We valued each of the 46 scored questions between 2 and 6 points, for a maximum of 100 points. We weighted the special focus section as 30 percent of the total.

Maximum Point Values (per section)

- 1. Records Management Program 14
- 2. Records Management Program Activities 15
- 3. Electronic Records 15
- 4. Records Disposition 18
- 5. Vital Records 8
- 6. Records Management Training 30

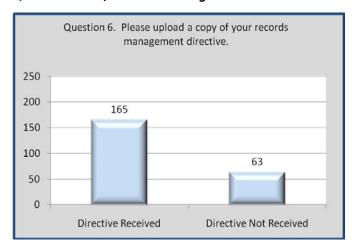
NARA considers those agencies receiving 90 or more total points to have a relatively low level of risk associated with their records management programs. We consider those with total scores between 60 and 89 to have programs at moderate risk, and those with scores below 60 at high risk. This year 95 percent of Federal agencies scored below 90, putting them in the moderate to high risk categories. Only 5 percent of agencies scored 90 or more and thus fall into the low risk category, compared to the 21 percent identified as low risk in the 2009 RMSA.

NARA added 28 agencies to this year's self-assessment because they are regulated by 36 CFR Chapter XII Subchapter B. Although the regulations require that agencies provide NARA with contact information for their Records Officers, not all do so. We are much closer to having contact with all regulated entities, but there may still be a few small or new commissions that we have not identified or contacted (nor have they contacted us).

#### Validation

As part of our methodology, we validated agency responses to questions 4 - 6 and 26, 27, and 29. For questions 4 - 6, we conducted a 100 percent analysis. For questions 26, 27, and 29, we looked at a random sample of 24 agencies. In analyzing responses we took agencies at their word and did not adjust scores.

Questions 4 – 6, Records Management Directive



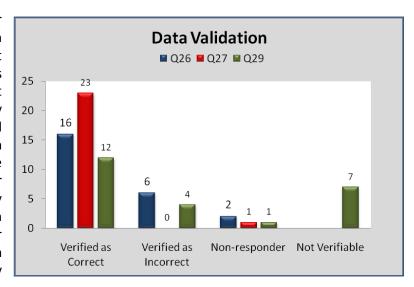
We validated the responses to questions 4 - 6 (Section 1: Records Management Program), where we asked agencies about their records management directive.

Even though 91 percent of respondents stated they had a records management directive, only 72 percent provided it to NARA as further evidence of compliance. Interestingly, the percentage received appeared to largely correlate with the percentage of agencies (67%) who stated they had reviewed or validated their records management directives since FY 2008.

#### Questions 26, 27, and 29, Records Scheduling and Schedule Implementation

Five of the six incorrect responses to question 26 (concerning when the agency last submitted a records schedule to NARA) understated the year in which the agency had last submitted a records schedule to NARA for approval (e.g., specifying FY 2008 - 2009 rather than FY 2010), thus lowering the agency's overall score. Conversely, a majority of the incorrect responses to question 29, which asked whether the agency had transferred permanent electronic records to the National Archives in FY 2009, improved the agency's score. Three agencies answered "yes" when NARA data indicated that "no" was the correct response, while one answered "no" when "yes" was correct according to our data.

There may be several reasons for these discrepancies. In tracking such transactions, some agencies may not date them in the same manner as NARA. For example, we count transfers of electronic records only when they are in our legal and physical custody. Some agencies, on the other hand, may count these transfers when they formally offer the records to NARA. Some agency records officers may have relied on guesswork rather than checking their operational records responding to the RMSA. It also may



be that their documentation of such actions as schedule submissions and transfers is inadequate or incomplete.

Regardless, we had to keep these discrepancies in mind when considering the data from this portion of the RMSA. Error rates of 25 and 29 percent in the verifiable responses to questions 26 and 29 raise serious questions about the accuracy of the results for individual agencies. We think that the overall results of the RMSA provide a generally accurate picture of records management in the Federal Government, but we also caution that the results are less likely to give a precise picture of records management in a specific agency.

#### **FY 2010 Records Management Self-Assessment**

NARA divided the FY 2010 Records Management Self-Assessment into six sections: Records Management Program, Records Management Program - Activities, Electronic Records, Records Disposition, Vital Records, and Training. A detailed discussion of the questions and findings for each section follows.

The final questions (questions 67 - 73) concern basic contact information and some important data about records management staffing at agencies that tie into the six main topical sections. The information agencies provided here, about the numbers of full-time records management staff, duty stations, and total FTEs in their organizations, informs all of our findings and recommendations, so we will address these questions first.

For this report, we define **resources** as whatever is required to carry out records management responsibilities or functions. Resources may be one-time or ongoing. Resources can be personnel, equipment, technology, facilities, or funding for administering a records management activity or completing a records management task. The lack of such resources will therefore limit the effective and efficient conduct of the activity or prevent the completion of the task. To cope with constraints on personnel resources, Federal agencies can utilize contractors to carry out records management tasks on a one-time or ongoing basis. Similarly, Federal agencies can invest resources in capital improvements like information technology solutions to improve access to and retrieval of data and documents.

#### **Federal Records Management - Demographics**

#### **Findings**

A significant number of agencies:

- Have a Records Officer (the main agency point of contact) who does not perform records management duties on a full-time basis; and
- Do not have adequate records management resources for the size of the agency.

#### **Analysis**

As of this publication, Office of Personnel Management and Department of Defense sources give us a total of approximately 4,640,000 employees in military and civilian service<sup>3</sup> in the U.S. Federal Government. According to the results of the 2010 RMSA, about 3,174 employees are assigned to records management responsibilities on a full-time basis – approximately one (1) records manager for every 1,460 employees. NARA believes that this number is actually lower. The RMSA asked agencies about full-time employees (FTEs) with full-time records management duties; however, some respondents included FTEs with only part-time records management duties in their answers, thus inflating their accounting.

The current regulations under 36 CFR 1220.34 state that an agency must:

- (a) Assign records management responsibility to a person and office with appropriate authority within the agency to coordinate and oversee implementation of the agency comprehensive records management program principles in § 1220.32; and
- (d) Assign records management responsibilities in each program (mission) and administrative area to ensure incorporation of recordkeeping requirements and records maintenance, storage, and disposition practices into agency programs, processes, systems, and procedures.

To assess the ability of an agency to monitor its own records management program, the 2010 RMSA included questions to ascertain how many individuals within each agency are assigned to handle records management duties on a full-time basis and how this relates to its size in terms of FTE and locations nationwide and abroad. These questions (questions 71 - 73) were formulated to see if there is any correlation between the demographic information and the risk levels of agency records management programs as defined for this report.

For military reserve and National Guard personnel totals (1.1 million as of May 2010), see the web site of the Office of the Assistant Secretary of Defense for Reserve Affairs, for example the publications *The 7 Reserve Components* (May 2010) and *Reserve Affairs Overview* (May 2010) available via http://ra.defense.gov/html/publications.html.

For information on full-time civilian personnel (2,065,171 as of March 2010), see the Office of Personnel Management's FedScope web site: http://www.fedscope.opm.gov/employment.asp.

<sup>&</sup>lt;sup>3</sup> For current data on active duty military (1,473,343 as of 9/30/2010), see http://siadapp.dmdc.osd.mil/personnel/MILITARY/miltop.htm.

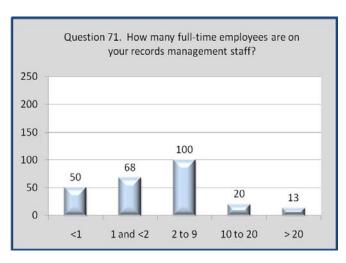
When asked about full-time employees (including contractors) on their records management staffs, at least 3 agencies with 10,000 or more FTE indicated that no one is responsible on a full-time basis for records management functions within their organizations. Forty-three agencies with 10,000 or more FTE reported having less than 10 employees with full-time records management responsibilities, which means they have at best one (1) FTE per 1,000 doing this work. Twenty-one of the 43 (10,000 or more

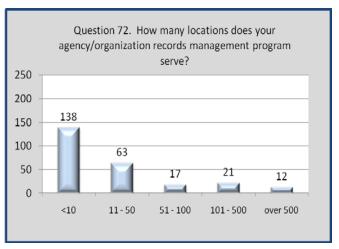
FTE) scored in the high risk category, 18 scored as moderate risk, and only 4 fell in the low risk category. The majority of respondents indicated that their organizations had between 1,000 and 9,999 FTE, and most of this group indicated that they have less than 10 employees with full-time records management responsibilities.

We also asked about the number of locations served by agency records management staff. The responses ranged from one (1) to in excess of 1,000, with a few reporting locations (primarily military installations) numbering in the many thousands.

The majority of the agencies who reported a high number of locations and a low number of people performing full-time records management received overall scores of less than 60, placing them in the high risk category. This may not be the only reason for their low scores, but it is certainly a factor.

Finally, to complement this demographic data, the 2010 RMSA also included two questions (questions 68 - 69) relating to the Records Officer position. We asked respondents to specify if they were the agency's Records Officer, and we asked them to provide their





position title. This question is designed to gather basic contact information, but it also ties in to Section 1: Records Management Program (see discussion of that section below). In that section we explore agency compliance with regulations to designate a Records Officer, and we see how the position descriptions and position titles of records management personnel vary across the Government.

These findings make it clear that it is not enough to mandate that each agency have a Records Officer; additionally (with the possible exception of micro-agencies with less than 100 employees), the Records Officer must be assigned to records management duties full-time. Moreover, each agency must employ a combination of staffing, information technology, and infrastructure-related resources to accomplish records management requirements.

#### **Section One: Records Management Program**

#### Regulatory background

Title 44 U.S.C. Chapter 31 § 3101-3102 directs the head of each Federal agency to "make and preserve records containing adequate and proper documentation..." and "establish and maintain an active, continuing program for the economical and efficient management of the records of the agency." The law further states that a records management program should provide for effective controls over the maintenance and use of records, cooperate with the Administrator of General Services and the Archivist of the United States in managing records in accordance with standards, and comply with regulations issued under this title.

Federal agencies are responsible for establishing and maintaining a records management program that complies with NARA and the U.S. General Services Administration (GSA) regulations and guidance under Title 44 U.S.C. Chapter 29. Also referred to as The National Archives and Records Administration Act of 1984, Title 44 U.S.C. Chapter 29 amended the records management statutes to divide records management responsibilities between NARA and GSA. NARA is responsible for overseeing agencies' adequacy of documentation and records disposition programs and practices. GSA is responsible for economy and efficiency in records management. GSA regulations are in 41 CFR Parts 02-193.

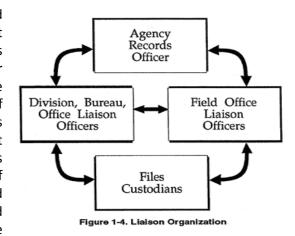


Figure 1: Chapter I-Disposition of Federal Records

NARA outlines essential records management program elements in Subchapter B of 36 Code of Federal Regulations Chapter XII and in the *Disposition of Federal Records: A Records Management Handbook*. The elements described in Part 1220.34 include assigning staff, developing a program directive, providing training, and evaluating program operations.

In the 2010 RMSA, NARA asked five questions (questions 1 - 5) to determine the extent to which agencies have established formal records management programs, focusing on resources and the individual agency's records management program directive. Question 6 (the last question in the section) asked the agency to provide a copy of their directive. The questions link to the following portions of 36 CFR § 1220.34 which states that agencies must:

- (a) Assign records management responsibility to a person and office with appropriate authority within the agency to coordinate and oversee implementation of the agency comprehensive records management program principles in § 1220.32;
- (b) Advise NARA and agency managers of the name(s) of the individual(s) assigned operational responsibility for the agency records management program;

- (c) Issue a directive(s) establishing program objectives, responsibilities, and authorities for the creation, maintenance, and disposition of agency records. Copies of the directive(s) (including subsequent amendments or supplements) must be disseminated throughout the agency, as appropriate, and a copy must be sent to NARA; and
- (d) Assign records management responsibilities in each program (mission) and administrative area to ensure incorporation of recordkeeping requirements and records maintenance, storage, and disposition practices into agency programs, processes, systems, and procedures.

#### **Findings**

Agencies are generally successful at assigning records management responsibility and developing records management program directives in accordance with these regulations.

#### Agencies generally:

- Designate a Records Officer (RO);
- Establish a network of Records Liaison Officers (RLOs); and
- Develop and update a program directive.

#### However, a significant number of agencies:

- Have an RO who does not perform records management duties on a full-time basis;
- Designate RLOs yet do not include records management responsibilities in their position descriptions; and
- Develop program directives but have not updated them in a number of years.

#### **Analysis**

Staffing

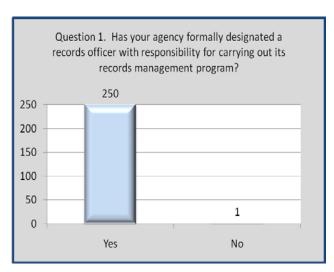
A qualified staff dedicated to records management on a full-time basis is a fundamental requirement for a successful program. 36 CFR Part 1220 requires agencies to assign responsibility to a person and office with appropriate authority to coordinate and oversee a comprehensive agency records management program. Additionally, agencies must advise NARA of the individual(s) who are given this operational records management responsibility.

Agency heads have the authority for records management, and they routinely delegate this authority to a program to manage operations. NARA refers to the agency's primary point of contact for records management as the Records Officer (RO). We have a sample position description -- that of Senior Records Manager -- on our website<sup>4</sup> to help agencies staff these positions. To work with the RO, each program and administrative area within an agency (allowing for obvious exceptions in so-called microagencies) should also have a designated records management contact, called the Records Liaison Officer (RLO).

<sup>&</sup>lt;sup>4</sup> Senior Records Manager Duties and Responsibilities: Sample Position Description located at http://www.archives.gov/records-mgmt/policy/senior-records-manager.html.

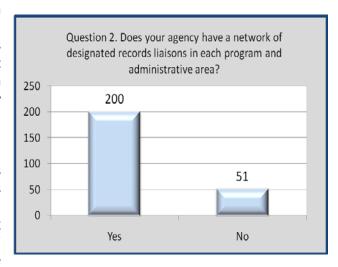
#### **Overall Response**

One hundred percent of agencies responded that they have formally designated a Records Officer with responsibility for carrying out its records management program (question 1). One agency qualified their answer, stating that it does not have an RO currently but it is in the process of hiring one. Of note, another agency commented that their Records Officer is a contractor who works part-time. We did not ask whether ROs are contractor or Federal, though we specified that contractors be included in the total full-time records management staff agencies provided in the Federal Records Management Demographics section (question 71) of the RMSA.

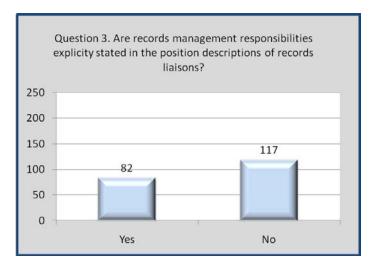


Another issue we see here, in conjunction with findings in the Federal Records Management – Demographics section (questions 67 - 73), is that although individuals are designated as Records Officers or Records Liaison Officers, they may perform additional duties other than records management. In

some cases records management may be only a secondary duty. In the Demographics section, respondents listed their position titles (questions 68 - 69). Of the 251 respondents, 219 stated that they were the agency Records Officer (question 68), but their actual job titles varied greatly (question 69). Some respondents said they had the job title of "Records Officer", and some said their titles included the words "Records Officer" in some way - for example "Agency Records Officer," "Bureau Records Officer," and "Records Management Officer." However, others provided titles with startlingly little relevance including "Governance and Internal Controls Supervisor," "Executive Assistant," "Administrative and Officer."



NARA did not endeavor in this survey to determine whether Records Officers had appropriate authority or placement within their agencies to effectively manage their records management programs. In the next RMSA, NARA will consider asking about organizational placement and the grade level of the Records Officer. To compensate for limited records management staffing, agencies should continue to explore technological solutions to these challenges. NARA will demonstrate its leadership by fostering and supporting these efforts. Furthermore, NARA will evaluate agencies' efforts to identify and deploy technological solutions to address their records management issues in the FY 2011 RMSA.



Part 1220.34 states that agencies must assign records management responsibilities within each program and administrative area in order to ensure incorporation of recordkeeping requirements and records maintenance, storage, and disposition practices into all programs, processes, systems, and procedures. Employees who are given these responsibilities, generally known as Records Liaison Officers, must work with each other and the agency's Records Officer to address recordkeeping requirements.

NARA asked whether agencies have a network of designated Records Liaison Officers in accordance with this regulation (question 2). Eighty percent responded affirmatively. Of the 20 percent that said they have not established such a network, most cited small agency size as the reason.

The next question (question 3) asked if records management responsibilities are explicitly stated in the position descriptions of RLOs. Tellingly, fewer than half the respondents (41%) answered "yes" to this

question. The omission of these responsibilities from RLOs' position descriptions implies that such duties are not critical to the employee's performance rating. If records management responsibilities are not specified in an RLO's position description and if they are not regularly evaluated during the annual performance appraisal process, the RLO designee may not take such duties seriously.

We did not include any questions in the RMSA about the level of involvement of RLOs in their agencies' records management programs, though in the Training section (Section 6) we did ask whether they receive records management training (question 56). There we see that 170 out of 251 agencies provided their RLOs with formal, regular records management training. This means that almost a third (81 of 251) did not receive such training. Considering this and the lack of clearly defined records

At [agency name withheld] ...the response to question 3 was mixed. More than 50% of our liaisons reported that Records Management Duties were not included explicitly in their PDs, or in their annual performance plans, but some have it included or are rated on it though it is not explicitly included (for example as part of an element such as "Support program by acting in an administrative or technical role, as assigned.").

Respondent Comment

management responsibilities in their position descriptions (only 41 percent had such responsibilities identified (question 3)), the low priority agencies often give records management is clear. The lack of defined responsibilities surely undermines the ability of agency records managers to play an effective role in the organization.

#### Directive(s)

According to 36 CFR Part 1220, agencies must develop a directive that establishes program objectives, responsibilities, and authorities for the creation, maintenance, and disposition of agency records. Copies of the directive(s) (including subsequent amendments or supplements) must be disseminated

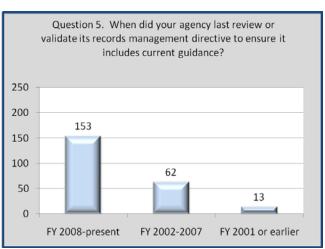
throughout the agency, as appropriate, and a copy must be sent to NARA. The *Disposition of Federal Records: A Records Management Handbook* also addresses requirements for a records management program directive, adding that it should be "strongly worded" and that it "...issue the proper delegations of authority, establish staffing patterns, and approve procedures." <sup>5</sup>

#### **Overall Response**

A majority of the agencies (91%) answered that they do indeed have a records management directive (question 4). Of the 9 percent that said they do not, most commented that it is in process and awaiting internal agency clearance. We also asked about the currency of agency records management program directives (question 5). Sixty-seven percent stated they either reviewed or validated their records management directive during FY 2008 - present; 27 percent said they did so between FY 2002 - 2007; and 6 percent said it was in FY 2001 or earlier.

A third of the respondents, then, have not updated their directive(s) in a number of years. This is a deficiency in their records management programs. They are not accounting for new records series, and they are not keeping up with records management best practices. example, NARA issues records management bulletins and related guidance on an ongoing basis. Recently issued NARA guidance includes information on creating flexible schedules, media-neutrality as it applies to agencies' records, and techniques for scheduling electronic records systems. Agencies need to incorporate pertinent portions of such guidance into their directives and other issuances.





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<sup>&</sup>lt;sup>5</sup> Disposition of Federal Records: A Records Management Handbook (http://www.archives.gov/records-mgmt/publications/disposition-of-federal-records/chapter-1.html#I.ProgramDirective).

#### Section Two: Records Management Program – Activities

#### **Findings**

A majority of agencies reported that they perform the following:

- Conduct program evaluations;
- · Perform records inventories; and
- Develop file plans to manage active records.

The questions in this section link to the portions of 36 CFR § 1220.34 which state that agencies must:

- (i) Institute controls ensuring that all records, regardless of format or medium, are properly organized, classified or indexed, and described, and made available for use by all appropriate agency staff; and
- (j) Conduct formal evaluations to measure the effectiveness of records management programs and practices, and to ensure that they comply with NARA regulations in this subchapter.

The last evaluation was conducted [in] 2008/2009. The staff members that conducted the evaluation no longer work for [agency name withheld] ..., and the evaluation documentation cannot be found.

Respondent comment

#### **Analysis**

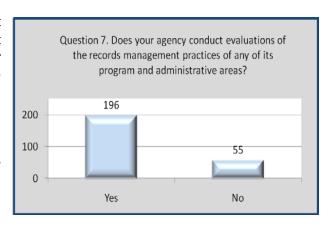
#### **Evaluation**

Good program management involves an evaluation component, sometimes called an audit or program review.

#### **Overall Response**

Seventy-eight percent of agencies reported that they conduct evaluations of records management practices in at least some of their program or administrative areas (question 7). This percentage might include larger administrative or program evaluations, of which records management is a merely a part.

Records management staff performed a majority of the evaluations (72%), followed by the "Other" category (31%), then by the Inspector General (24%), and finally by Contractors or Consultants



(17%) (question 8). NARA asked agencies to specify who conducted the evaluations when they selected the "Other" category. Those that selected this answer commented variously that Information Security Officers, Administrative Officers, and Risk Management Program Managers performed evaluations.

NARA did not ask about the comprehensiveness of agency records management evaluations. Our phrasing was "any of its program or administrative areas," which admittedly may have left this question



open to interpretation. An agency could have responded "yes" if it had evaluated one small program area, or if it had evaluated its agencywide records management program.

When asked how often they performed evaluations (question 9), 47 percent stated "Annually"; 24 percent said "Every 2 - 4 years"; 28 percent said "Infrequently"; and 2 percent said "Never." Of those that perform evaluations, a little over half (61%) prepared written reports (question 10), and 86 percent reported briefing senior officials on the findings (question 11). Eighty-four percent stated that they followed up to determine

whether steps had been taken to implement recommendations or corrective actions (question 12).

#### **Records Inventories**

Agencies perform records inventories in order to provide information needed to schedule records and to identify records management weaknesses. Two portions of 36 CFR Chapter XII Subchapter B address records inventories. Part 1222.28 requires each agency program to develop recordkeeping requirements for records series and systems that include:

- (a) Identification of information and documentation that must be included in the series and/or system;
- (b) Arrangement of each series and the records within the series and/or system; and
- (c) Identification of the location of the records and the staff responsible for maintaining the records.

While this regulation does not specifically use the word "inventory," it is implied that records must be identified and information gathered on the arrangement, location, and custodianship of the records. A records inventory provides this information.

Part 1225.12 of 36 CFR Chapter XII Subchapter B is more specific in that it states agencies must:

- (a) Conduct a functional or work process analysis to identify the functions or activities performed by each organization or unit.
- (b) Prepare an inventory for each function or activity to identify records series, systems, and nonrecord materials.

The NARA records management handbook, *Disposition of Federal Records*, provides a detailed explanation of how to perform records inventories. It also provides forms that can be tailored by agencies as needed.

#### **Overall Response**

Sixty-three percent of agencies stated that they regularly inventory their records (question 13), and 80 percent said they have done so within the last 2 years (question 14). The CFR and other guidance do not specify a timeframe for agencies to conduct records inventories. However, as we've established agencies are required to perform periodic updates of their records schedules, so for agencies that do these updates it follows that they also conduct records inventories to some degree.

#### File Plans

Many agencies utilize file plans as a means of managing active records. NARA defines a file plan as a document

The records management program has developed guidance on how to create and use a File Plan that is posted on the records management website. The records management program recommends that offices use this tool to manage their records. In addition, the file plan quidance was discussed at a recent Bureau Records Coordinator seminar. The records management program believes this approach is consistent with the records management requirements found in 36 CFR. The records management program also recommends that offices develop standard operating procedures governing the management of records in their offices.

Respondent Comment

containing the identifying number, title or description, and disposition authority of all paper, electronic, and other special media files held in an office. A file plan is essential to an agency's ability to implement its records disposition program. Without one, agencies will find the maintenance and disposition of records more difficult and time-consuming.

#### **Overall Response**

Sixty-nine percent of agencies reported that they require every program and administrative area to maintain a file plan (question 15). There is no regulatory requirement that agencies must have file plans; however, agencies are mandated to be able to identify records and properly manage them, and file plans are effective and in many cases necessary tools for doing so. They are particularly important for organizations wanting to transition to or use electronic recordkeeping tools.

#### **Section Three: Electronic Records**

#### **Findings**

The responses in this section indicate that records management programs in many agencies:

- Do not ensure that e-mail records are preserved in a recordkeeping system;
- Do not monitor staff compliance with e-mail preservation policies on a regular basis;
- Have policies that instruct employees to print and file e-mail messages;
- Consider system backups a preservation strategy for electronic records, and do not distinguish between saving and preserving electronic records;
- Consider compliance monitoring to be the responsibility of IT staff; and
- Are rarely or not at all involved with, or are excluded from altogether, the design, development, and implementation of new electronic systems.

These findings confirm that management of electronic mail remains the most troubling issue. Agency comments in response to the RMSA reveal that only a few agencies have a DoD 5015.2 compliant electronic recordkeeping system. Many agencies, even if they have implemented an electronic recordkeeping system, are not able to use it to capture e-mail messages because the recordkeeping system and the e-mail systems are incompatible. Most Federal agencies do not manage their e-mail records in an electronic recordkeeping system at all; instead they employ inefficient and ineffective "print and file" practices that result in the inadequate preservation of messages that meet the criteria for Federal records. Agencies are now looking into purchasing e-mail archiving software

[Electronic recordkeeping] needs a lot of work. Too overwhelming at this point since the paper is in such a dismal state.

Respondent Comment

products that are easier to stand up, but most such systems do not provide fully compliant life-cycle management of record messages. As a result, agencies are basically saving all messages without any system for distinguishing between record and non-record or between permanent and temporary.

The idea that system backups suffice as an electronic recordkeeping system is a persistent misconception among agency staff. Many, including those with records management responsibilities, do not recognize the difference between saving and preserving electronic records. "Preserving" in the sense meant here involves the proper application of records retention schedules and the preservation, in viable and usable formats, of records with permanent or long-term value. The integration of records management controls into system design and development is necessary to achieve this, and it requires collaboration between records management and information technology (IT) programs. Although a number of agencies have successfully established these internal relationships or are actively working to do so, many records officers have little or no involvement in the design, development, and implementation of electronic information systems.

Both the records management and IT professions should encourage collaboration between the two groups. This might be achieved by a partnership between the Federal Records Council, an interagency advisory group that provides advice and support to NARA and OMB on Federal records and information management issues, and the Chief Information Officers (CIO) Council, the principal interagency forum for improving practices in the design, modernization, use, sharing, and performance of Federal Government agency information resources.

#### **Analysis**

Managing electronic records remains a significant challenge for Federal agencies, as the technical issues are often compounded by the lack of senior management support and staff resources. Even with program support, electronic records are difficult to manage for several reasons: the technological complications involved in their preservation and proper disposition; the immense volumes involved; the proprietary and cutting-edge technologies used to create the records; and the decentralized environment in which they reside. However, the heightened awareness of the issue, as evidenced by recent Congressional testimony and reports by NARA and GAO, may present an opportunity to make substantive progress towards a workable solution.

Question [20] assumes there is a sizable staff/resources dedicated to such activities. That's an unrealistic assumption for most agencies.

Respondent Comment

Management of electronic records is covered by 36 CFR Part 1236, revised by NARA in November 2009. For the 2010 RMSA, NARA focused on those sections of 36 CFR Part 1236 that require agencies to:

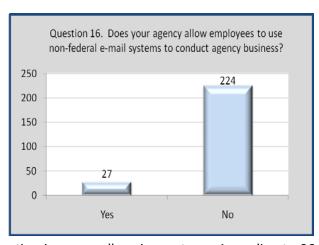
- Ensure that official e-mail messages sent or received on a system not operated by the agency be preserved in the appropriate recordkeeping system;
- Integrate records management and preservation considerations into the design, development, enhancement, and implementation of electronic information systems; and
- Retain records in a usable format until their authorized disposition date.

The scores for this section vary widely, in some cases even among different program offices of the same agency. We take this as an indication that records management practices are not only inconsistent throughout the Federal Government but within agencies as well. For example, the scores for organizations within two large agencies ranged from 2 to 14, for overall agency scores of 7. This suggests a lack of centralized records management leadership, leaving no one to establish, promote, or enforce standards for electronic records practices in their subordinate organizations.

#### Preservation of E-mail Messages

#### **Overall Response**

Although a majority of Federal agencies responded that they do not allow the use of non-Federal email systems to conduct agency business (question 16), only a third of those who prohibit such use actually block access to non-Federal systems (question 17). A number of respondents commented that they have a policy to prohibit use of non-Federal systems, but they have no technical means to enforce it. Slightly more than half of the agencies said that they ensure that e-mail records are preserved in the agency's recordkeeping system (question 18). However, this number may actually be lower because comments revealed that

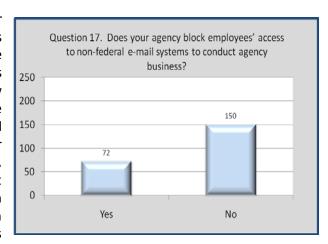


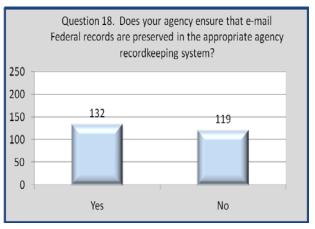
some agencies equate system backups with preservation in a recordkeeping system. According to 36

CFR 1236.20(c), system and file backup processes and media do not provide recordkeeping functionalities and must not be used in the place of an electronic recordkeeping system.

A third of the agencies answered that they monitor compliance with e-mail preservation policies (question 20). However, the responses to the follow-up question (question 21, which included as an option "Other, please specify"), concerning how frequently they monitor compliance demonstrate a misunderstanding of the nature of e-mail preservation. Some said they continue to consider compliance the domain of network engineers, system administrators, or IT staff, indicating that the concept of "compliance" has less to do with the identification and preservation of records than with server space and the deletion of messages regardless of record status. Several other agencies stated that all e-mail is automatically preserved, again showing a lack of understanding of what constitutes a recordkeeping system.

The number of Federal agencies who use electronic recordkeeping systems is unknown. Several reported that they use a Records Management Application (RMA) or are in the process of acquiring/implementing one. One agency said that electronic documents, excluding e-mail messages, are filed in an RMA. However, according to their own comments many agencies





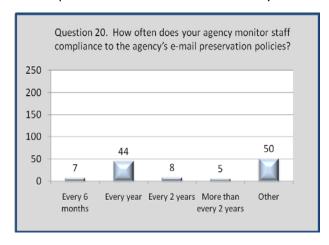
continue to print and file e-mail messages. The "print and file" approach is not a satisfactory solution, as it reflects a reliance on methods that do not account for the media and formats of the records and the preservation of related metadata.

Despite these concerns, we also see some positive trends in some agency comments in this section. Agencies do recognize the importance of preserving electronic mail records and address compliance in their training and during meetings with agency staff. One agency commented that they partner with IT staff to provide training in e-mail management with the goal of identifying Federal records and preserving permanent e-mail messages. Another agency stated that the agency Records Officer works with Records Liaison Officers to monitor compliance and meets with senior officials as needed to review compliance requirements.

#### Integration of Records Management Controls in New Systems

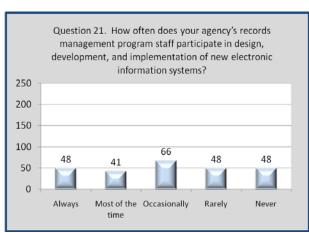
#### **Overall Response**

These questions pertain to the involvement of records management staff in the design, development, and implementation of new electronic systems. They also touch on the inclusion of recordkeeping



functionality in systems. Only 19 percent of Federal agencies answered that their records management staff always participate in this process, and another 16 percent said they do so "most of the time" (question 21).

About a quarter are involved "occasionally," and nearly 40 percent are rarely or never involved. This last number is reflected in the responses to the next question (question 22) in which 44 percent said that their agency does not ensure that records management controls are incorporated into new electronic information systems.



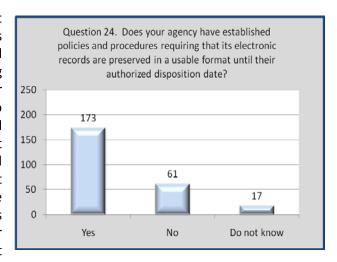
A number of agencies commented that they currently participate in the Capital Planning Investment Control (CPIC) process. They also said they collaborate with the agency's CIO office and/or IT group to ensure that systems are in compliance with NARA regulations. Other agencies said they are currently working to become more involved with system design and development and establish a good relationship with IT staff. Despite such progress, the collaboration between records management and IT staff remains an area of concern, requiring more advocacy and training.

A little over half do not approve the business case for a new electronic information system (question 23). This is slightly more than the percentage of agencies who responded negatively in the previous question about the incorporation of records management controls in systems (question 22). OMB Circular A-11 references the Federal Records Act and reminds agencies that they must comply with the Act's requirements.

#### Preservation of Electronic Records in a Usable Format

#### **Overall Response**

A majority of Federal agencies claim here that they have established policies and procedures requiring that electronic records are preserved in a usable format. However, mirroring comments made in responses to earlier questions, some agencies consider this issue to be the responsibility of the IT department and not records management. One respondent stated that efforts to acquire an e-mail "archiving system" were not supported and that all e-mail is backed up on tapes, reinforcing the notion that some agency staff still equate this practice with a preservation strategy. Other agencies have written system requirements but



were unsuccessful in getting them adopted, due to the lack of leadership support for records management within the agencies.

#### **Section Four: Records Disposition**

#### **Findings**

Agencies must have an effective records disposition program so they can 1) have readily available the records they need for current business, and 2) appropriately dispose of records that they no longer need for current business. Federal records managers can achieve effective and efficient disposition of records by scheduling them, ensuring their proper storage, and providing for prompt disposal of temporary records and the timely transfer of permanent records to the National Archives. 36 CFR § 1224 sets policies and establishes standards, procedures, and techniques for the disposition of all Federal records in accordance with 44 U.S.C. Chapters 21, 29, 31, and 33. This regulation requires agencies to:

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

The nine scored questions in this section sought information on agencies' records scheduling activities and implementation of their schedules. The responses led us to the following conclusions:

- While most Federal agencies have a functioning records disposition program, a small minority have submitted no new or updated records control schedules within the past 10 years;
- Although many Federal agencies have made measureable progress in scheduling their electronic information systems in recent years, less than half have met the goal of fully scheduling such systems for disposition;
- Schedule implementation, in terms of systematically transferring permanent records to NARA, is inconsistent, particularly in the case of electronic data; and
- A significant minority (41%) of Federal agency records management programs do not oversee records disposition by senior-level officials.

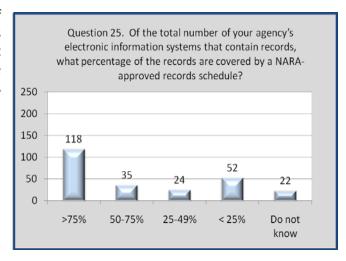
#### **Analysis**

#### Scheduling Records

#### **Overall Response**

The responses indicate that the majority of Federal agencies have a functioning records scheduling program. More than 70 percent reported that they submitted one or more records disposition requests (SF-115s) to NARA for approval from FY 2008 to FY 2010 (question 26), and nearly half of agencies have more than 75 percent of their electronic information systems covered by a NARA-approved records schedule (question 25).

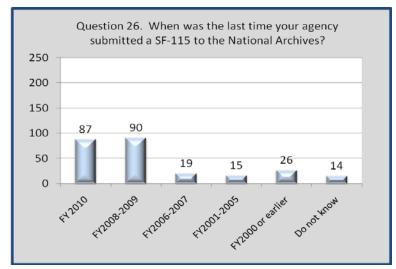
However, a records scheduling program may be functioning at a minimal level without being effective overall. As an example, a large agency



with a broad range of responsibilities may submit an occasional schedule to NARA, but this may not be adequate to keep the agency's schedules current in the face of changes in programs and updates in information management technology.

A number of agencies (almost 10%) have not submitted any schedules in more than 10 years (question 26). Schedules that are more than 10 years old are likely to be at least partially obsolete, given

reorganizations, the addition and elimination of programs, and changes in recordkeeping practices. They are also unlikely to cover web records and electronic systems of recent origin. The percentage of agencies operating without updated schedules understated, for a few records officers did not know when their agencies had last submitted a schedule. comments indicated that one of two situations generally applied: either the agency had not submitted a schedule within the records officer's tenure, or the recently designated records officer



had no information at hand to answer the question. Either case suggests that the program lacks institutional controls and cannot account for a fundamental records management function.

Almost half of the agencies have more than 75 percent of their electronic information systems covered by a NARA-approved records schedule (question 25). This is not necessarily due to significant records scheduling activity, because the disposal of agency electronic information systems relating to administrative housekeeping activities is authorized by the General Records Schedule (GRS 20, Item 3a) on a Government-wide basis. In other words, agencies normally need not develop schedules for electronic information systems relating to administrative housekeeping activities. Rather, they can simply apply the authority provided by the GRS for such systems.

Moreover, the RMSA responses show that a substantial number of agencies have yet to fully schedule their electronic records systems. NARA Bulletin 2006-02, issued in December 2005, provided guidance for implementing Section 207(e) of the E-Government Act of 2001, requiring all Federal agencies to identify and schedule their electronic records. The bulletin formally established a Government-wide deadline of September 30, 2009, for agencies to submit records schedules to NARA for all their existing electronic records. Despite the submission of records schedules covering 2,404 series of electronic records between FY 2005 and FY 2009, 76 agencies (30%) report that less than half of their electronic information systems are covered by a NARA-approved schedule (question 25). Two-thirds of this number (52 agencies) report that less than a quarter of their electronic information systems are scheduled.

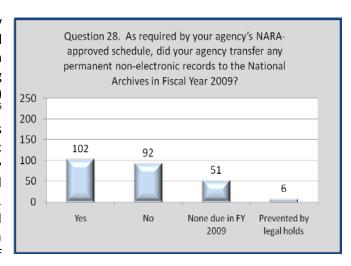
This is a significant deficiency. Electronic information systems evolve rapidly, and hardware and software can quickly become obsolete. Costs may weigh against migrating data forward, particularly if the data appears to have rapidly diminishing value for agency operations. It is critical, therefore, that as

agencies develop electronic information systems they determine the value of the data for legal, fiscal, and administrative accountability and schedule the records accordingly.

#### **Implementing Schedules**

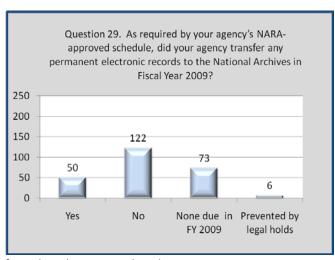
#### **Overall Response**

Overall, agencies are not systematically transferring permanent records to the National Archives on a timely basis. This deficiency in applying records schedules is particularly glaring in terms of (though by no means confined to) electronic records. Of 251 respondents, 1946 reported that they had non-electronic records eligible for transfer in FY 2009 (question 28); however, only 53 percent (102 of 194) actually transferred any such records to the National Archives in the fiscal year. Of the 251 respondents, 172<sup>7</sup> reported that they had eligible electronic records (question 29), but an even smaller proportion -- 29 percent (50 of 172) -- transferred any such records.



We note that significantly more agencies reported transfers of permanent non-electronic records (102) than electronic records (50) in FY 2009. This disparity is due in part to the large number of agencies reporting no electronic records eligible for transfer. A contributing factor may be that many agencies' electronic information systems remain unscheduled (see question 25), and the electronic data are thus ineligible for transfer.

When agencies fail to transfer electronic records to the National Archives on a timely basis, the historically valuable data becomes increasingly vulnerable to loss or obsolescence. Hardware and software changes demand that data be migrated forward to ensure record functionality and integrity. Scheduling electronic information systems for appropriate disposition is a critical element of effective records management, but scheduling alone is not enough to ensure that the data is effectively managed and preserved for as long as needed. Schedules must be implemented in timely fashion, and data designated for



permanent retention must be systematically transferred to the National Archives.

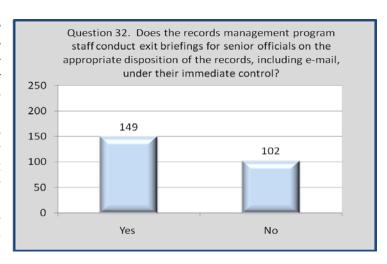
<sup>&</sup>lt;sup>6</sup> The total number of agencies that answered "yes" or "no" to question 28.

<sup>&</sup>lt;sup>7</sup> The total number of agencies that answered "yes" or "no" to question 29.

#### Overseeing Disposition by Senior-Level Officials

#### **Overall Response**

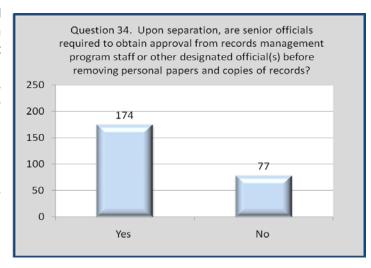
These figures indicate that the records management staff in many agencies makes little effort to ensure that seniorlevel officials are fully apprised of their responsibilities for appropriate disposition of records, including e-mail, under their immediate control. responsibility is critical because many officials enter Government directly from the private sector, and they have no experience in managing public records. Moreover, many are not only public officials with responsibility for overseeing critical Federal programs, but



they can also play political roles as surrogates for the administration that appointed them. In this capacity they can accumulate personal papers that are not Federal records, and it is important that they be aware of the distinction between personal papers and Federal records and the requirements governing disposition of the latter.

The records management staff at only 59 percent of Federal agencies conduct exit briefings for senior-level officials on the appropriate disposition of the records, including e-mail, under their immediate control (question 32). One in five of those who do conduct such exit briefings fail to document them (question 33), suggesting that their briefings are ad hoc and informal. Agency comments illustrate other limitations here. For example, the records management staff in one agency provided exit briefings only upon the request of a senior official. In several other agencies, the records management staff did not participate in the exit briefings, which were conducted by agency legal staff or security officials.

Sixty-nine percent of agencies reported that senior officials are required to obtain from records management approval program staff or other designated official(s) before removing personal papers and copies of records (question 34). The comments in this section, however, suggest that this percentage is overstated. Several agencies say they have put specific oversight procedures in place, which is good: the Records Officer for one Cabinetlevel component, for example, is required to sign the exit forms of the highest-level agency officials, while officials under that level are required to submit signed forms



to the records management program on exiting the agency. In another Cabinet-level component, senior officials are required to meet with the Records Officer and Records Liaison Officers for a briefing on

records disposition prior to departing the agency. In a greater number of agencies, however, the comments indicate that documentation for high-level officials is nothing more than the pro forma exit form required of employees separating from the agency.

#### **Section Five: Vital Records**

#### **Regulatory Background**

NARA regulations for managing vital records fall under 36 CFR Chapter XII Subchapter B Part 1223. The authorities for this part are 44 U.S.C. 3101; Executive Orders 12656, Assignment of Emergency Preparedness Responsibilities, and 13231, Critical Infrastructure Protection in the Information Age; and National Security Presidential Directive (NSPD 51)/Homeland Security Presidential Directive (HSPD-20) or applicable successor directives. These authorities require the head of each agency to make and preserve records that contain adequate and proper documentation of the organization and to perform national security emergency preparedness functions.

Agencies are responsible for identifying, protecting, and making readily accessible their vital records. Vital records fall into two categories. They are emergency operating records, which are essential agency records needed to meet operational responsibilities during national security emergencies or under other emergency conditions; or they are legal and financial rights records, those records needed to protect the legal and financial rights of the Government and those affected by Government activities during emergencies.<sup>8</sup>

To accomplish this work, agencies follow the guidance provided in the U.S. Department of Homeland Security's (DHS) Federal Continuity Directive (FCD) 1, Federal Executive Branch National Continuity Program and Requirements, and FCD 2, Federal Executive Branch Mission Essential Function and Primary Mission Essential Function Identification and Submission Process. NARA's regulations incorporate this DHS guidance.

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

To carry out a vital records program, agencies must:

- Specify agency staff responsibilities;
- Appropriately inform all staff about vital records;
- Ensure that the designation of vital records is current and complete; and
- Ensure that vital records are adequately protected, accessible, and immediately usable.

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<sup>&</sup>lt;sup>8</sup> 36 CFR Chapter XII Subchapter B §1223.2

#### **Findings**

The findings for this section show that a significant minority of agencies:

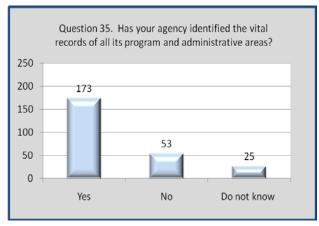
- Either have not identified their vital records or do not know if they have been identified;
- Continue to view the records management and continuity of operations (COOP) programs as unrelated;
- Do not perform a required annual review of their vital records program; and
- Provide limited training on vital records to records liaisons and emergency management staff.

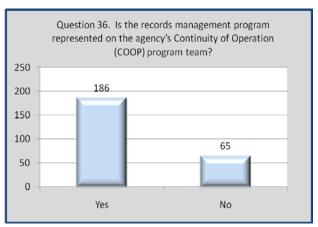
The vital records program would require another FTE. We don't have this luxury. Programs are encouraged to identify such records and take appropriate action.

Respondent Comment

#### **Analysis**

#### **Overall Response**





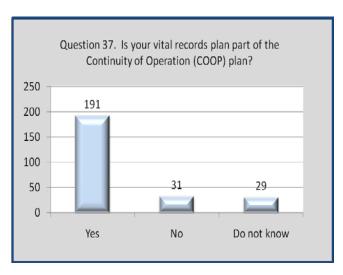
Thirty-one percent of respondents reported (question 35) either that their agencies have not identified their vital records (21%) or that they do not know whether they have done so (10%). We note here the percentage who answered "do not know"; we think this does not necessarily mean their agencies overall have not done so. Instead, as these agencies are mostly large and medium in size and not microagencies, they may simply assign vital records responsibilities to a different program (most likely their emergency management program). It would follow, then, that their records officers do not participate in the emergency management function. However, only four agencies told us that responsibility for vital records was held by another part of their agency, so we are unsure of the correlation.

A lot of 'do not knows' in this section. The COOP/vital records initiative is in its early stages. Guidance is in place. Procedures and application at the department level are pending.

#### Respondent Comment

The 2009 survey also returned a high number of negative responses in this section. Again we suspect this is because vital records falls under the emergency management function at many agencies. According to the definition in Part 1223.2, a vital records program is indeed a program element of emergency management. However, the regulation does not state where the function should be placed organizationally within an agency, only that agencies should establish a program to address vital records requirements. FCD 1 states rather

broadly that "an agency must decide which records are vital to its operations, and then must assign responsibility for those records to the appropriate personnel, who may be a combination of continuity personnel, personnel in the chief information officers department, and records management personnel."

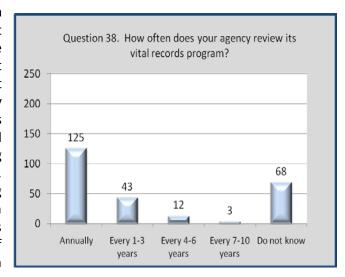


Agencies are therefore free to assign responsibility for this function differently, with some giving a joint role to its records management program in conjunction with emergency management, and others locating it solely within emergency management. One result is that a Records Officer might not have responsibility for the vital records program in his or her agency, and so is unable to answer our questions in this section.

To examine this further, we added a question (question 36) this year regarding whether the records management program is represented on its COOP program management team. Many

agencies (74%) reported that their records management program is represented. However, a significant number (26%) answered "no" to this question.

We investigated whether there was a correlation between agencies reporting that they have not identified vital records and those said records management is not represented on COOP program management teams. Our data analysis did not conclusively support this finding. Some records officers answered "no" to having identified vital records, but also answered "yes" to being represented on the COOP program team. Therefore, the question becomes what being "represented" on the COOP program team means in actual practice and whether this representation leads to the identification of vital records. As we did not undertake an



evaluation of agencies' emergency management functions, and as it is established that many agencies place vital records responsibilities there, we cannot say whether these responses indicate a true weakness in identifying vital records.

A significant portion of agencies stated that their vital records plans are incorporated within their COOP plan (question 37). However, 24 percent responded either "no" or "do not know" to this question. A number of these agencies commented that their plans are currently being drafted and that their programs are undergoing transition. Most of these agencies also stated that they had not identified their vital records.

Just half of the agencies stated that they perform an annual review of their vital records program (question 38). This is a troubling finding because DHS stipulates an annual vital records program review as part of continuity exercises. It also requires agencies to perform annual tests of their capabilities to protect and provide access to vital records.

DHS also states that vital records training must be provided to all staff and that it should include periodic briefings to managers. We therefore included a question about vital records in Section 6 of the RMSA, which focused on records management training. We learned that many agencies are not addressing vital records in their training to all staff. In fact, agencies train significantly less frequently on vital records than on any other topic. This result seems to support our finding that the vital records function may be separated from records management in many agencies. We feel this stems from, and in turn perpetuates, a lack of understanding of records management program objectives within agencies that do this.

### **Section Six: Training**

A key component of a successful records management program is training. This area was identified as a critical weakness based on the data from the 2009 RMSA. Records management training is the special focus of this year's questionnaire.

In the pre-electronic workplace, records were created, managed, and maintained by a select group of agency staff. They stored records in central locations, usually in file cabinets. Agencies had designated staff responsible for filing records and monitoring access to them. This is no longer the case. Today, virtually every Federal employee creates, if not manages or maintains, records electronically. While many agencies have paper recordkeeping systems, countless terabytes of data in the form of reports, notes, spreadsheets, photographs, and databases are stored on individual hard drives, thumb drives, networks, in the "cloud", mobile devices, and on back-up tapes.

The Federal Government's flexiplace initiative further complicates the situation. Many employees work from home or alternate work sites at least one day a week. Some use agency equipment, and others use their personal computers. With the diffusion and devolution of recordkeeping to the electronic sphere, it is increasingly important that all agency personnel receive adequate and practical records management training.

#### **Findings**

- Agencies rely heavily on computer-based training, internal web sites, and broadcast e-mails to provide training to employees;
- Only a small percentage of respondents (14%, or 34 of 251) said they provide formal records management training to all staff, including new employees, records liaisons, contractors, and senior officials on all records management topic areas;
- Most agencies use forms to evaluate the effectiveness of their training;
- A significant number of agencies do not include information in their training on implementing their records schedule;
- Agencies that don't provide training to their employees cite the lack of records management staff as their primary reason for not doing so, followed by lack of funding and resources; and
- Training for senior officials continues to be a concern in most agencies.

#### **Analysis**

Current regulations provide limited guidance regarding the role of training in agencies' records management programs. 44 U.S.C 2901(2), Records Management, touches on training in the overall definition of records management. The requirements found in 36 CFR, Subchapter B, are only broadly defined. Part 1220.34(f) requires agencies to "[p]rovide guidance and training to all agency personnel on their records management responsibilities, including the identification of Federal records, in all formats and media." Part 1224.10(e) states that agencies must "[p]rovide training and guidance to all employees on agency records disposition requirements and procedures and other significant aspects of the records disposition program."

NARA developed a suite of standard records management training courses that we present across the country to Federal employees. The suite includes a set of five classes designed to help participants

achieve NARA certification in Federal records management. In addition to these courses, we offer training in vital records management, disaster preparation and recovery, basic records management, and electronic records. We also offer briefings for information technology professionals, program managers, and legal staff.

Since the beginning of FY 2007, nearly 3,400 Federal employees have attended NARA records management training classes. Of this number, 1,019 Federal employees were certified in Federal records management. The majority of employees that complete the NARA training are agency records managers, and ideally they pass on what they learn to their colleagues. However, there are approximately 4.6 million military and civilian employees in the Federal Government. <sup>9</sup> Considering the relatively few records management personnel that NARA can reach directly, and the huge numbers of employees that they are responsible for in turn, the challenge of providing adequate, useful, and realistic records management training to all agency employees is daunting.

#### **Records Management Training for Agency Staff and Contractors**

#### **Training for New Employees**

The first set of questions in this section addresses if, and how, agencies provide records management training to new employees. An agency's approach to this issue says a lot about the importance it places on records management. At a minimum, training should cover records management roles and responsibilities, outline policies and practices, establish points of contact for records management assistance, and provide an overview of the records schedule and how to use it. The goal should be to establish a firm foundation in records management that employees can build on throughout their Federal service. The quality of this information and how well it is conveyed can affect an employee's approach to records management throughout his or her Federal career.

#### **Overall Response**

While a majority of agencies provide records management information to new employees (question 39), a significant minority do not. Of those that answered "no" to this question, 19 were large agencies with 10,000 or more FTE located in multiple sites. Thirty-two agencies with 1,000 - 9,999 FTE also answered "no". Here we see that significant numbers of new Federal employees do not receive an introduction to their agency's records management programs.

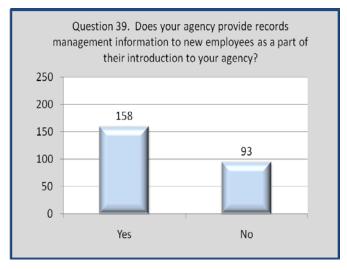
Every agency has its own unique new employee orientation process. A majority, according to the survey, incorporate records management information in the orientation process or at least post it on their web sites. The effectiveness of this method is likely to differ among agencies. New hires are typically inundated with all types of information as they start their jobs. Employees may receive records management guidance just as they learn about their payroll process and insurance options, which naturally hold a more immediate and personal interest. If new hires are given a large stack of memos or handbooks to read, or simply links to a variety of web sites to peruse, records management information will most likely lose priority. If the orientation process is more interactive (including briefings by records management staff, for example), the distribution of the information may be more effective.

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<sup>&</sup>lt;sup>9</sup> See Federal Records Management – Demographics section in this report for specific information on personnel statistics.

Web sites, information packets, and broadcast e-mails can be good training mechanisms in some cases. However, we consider them to be "passive" tools in the sense that it is incumbent upon the employee to access, read, and act on them. They are most effective when employees are already acquainted with records management and have a desire to practice it. We see this as a rare combination for new employees in particular.

A number of agencies mentioned that they use computer-based/on-line training, or CBTs. Here again, however, depending on the curriculum and level of interactivity, this type



of training may rely too heavily on the initiative of the individual employee. CBTs are not always an effective way to provide important records management information, especially to new hires.

Some respondents commented that it is the responsibility of managers and supervisors to conduct records management training. We disagree, preferring to have qualified records managers in this role; however, our main concern is that there is some mechanism in place. If the supervisors or managers involved support good records management practices, having them brief new hires is less problematic.

#### **Formal Records Management Training**

The next series of questions (questions 41 - 50) ask about agencies' formal records management training. We defined formal training as:

"... [T]he communication of standardized information that improves records management knowledge, skills and/or attitudes of agency employees. Training can be classroom or distance-based, but it must:

- Be regular (occurring more than 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."

We asked specifically about training for contractors, and training for all employees (training for Records Liaison Officers is addressed in a separate section.) As we mentioned before, Federal guidance (the CFR, for example) addresses records management training only generally. NARA offers more detailed information in our records management class, *Knowledge Area 6: Records Management Program Development*. In this course we discuss the benefits and characteristics of effective training, some different types of training, and modes of delivery systems. We also state that agencies should conduct a needs analysis to determine what training is needed, and that they should have a way to evaluate whether the training is effective.

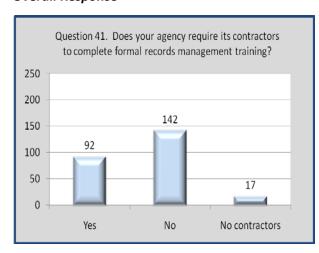
<sup>&</sup>lt;sup>10</sup> Instructor-led, web-based, computer-based, self-study, on-the-job, and blended training.

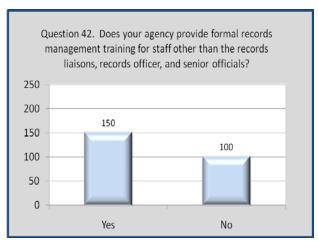
The prevalence of contract work in the Federal system is another reason that records management training is so important. More and more agencies are relying on contractors to perform work previously done by Federal employees. The use of contractors has increased in recent years, particularly in the Department of Defense but in other agencies as well. Contractors manage and maintain IT systems, operate national laboratories, support records management programs, and provide security and logistical services. The expanding use of contractors for these and many other tasks makes it critical that they be trained to properly manage the Federal records they create.

Formal training programs, if done correctly, have a consistent, standardized curriculum that communicates the agency's vision of records management and gives participants practical tools to manage their records appropriately. With the explosion of electronic information, the decentralization of records management to the desktop, and the exodus of administrative support personnel traditionally responsible for managing centralized files, it is crucial that all Federal employees receive some type of formal, agency-specific records management training.

Additionally, while most agencies still have "print and file" policies, the overwhelming amount of information being created on a daily basis throughout the Government makes these policies difficult to implement. Often individuals manage their own records, whether or not they are trained in their agency's records management policies. Given the lack of staff with full-time records management responsibilities in proportion to the size of most agencies, the burden necessarily falls on individual employees to ensure that the records of their agency are managed appropriately.

#### **Overall Response**





The majority of agencies provide some type of formal records management training to their employees (question 42). Only half of the agencies that train employees also train their contractors. Eight agencies require their contractors to attend training, but they do not provide it to their employees. In some agencies, the number of contractors equals or exceeds the number of Federal employees.<sup>11</sup> These

<sup>&</sup>lt;sup>11</sup> For example, as of February 2010 the Department of Homeland Security had 188,000 FTE and 200,000 contractors. See statement of Homeland Security and Governmental Affairs Committee Chairman Joe Lieberman, ID-Conn., and Ranking Member Susan Collins, R-Me, following hearings on DHS appropriations for FY2011:

contract employees are doing more and more tasks that were formerly performed by Federal employees. Therefore, agencies should include language in their contracts requiring contract employees working on Federal projects to complete records management training.



For the significant minority of agencies that do not provide formal training for their employees, most cite a lack of records management staff or lack of funding and other resources as the principle factor (question 43). A small number of agencies (25) said they were micro-agencies (1 - 99 FTE), and therefore they did not need a training program. However, 12 of the 25 contradicted this assertion in the of this self-**Demographics** section assessment (question 73). Many agencies conduct formal (57%) that management training said they had trained 81 to 100 percent of their employees and

that the training was mandatory (question 45). When we broke down the data, however, we came to doubt this high percentage. The responses were inconsistent in general; for example 11 agencies said that their training was mandatory, but they also said that fewer than 80 percent of their employees were trained. Ten agencies said they had trained 81 to 100 percent of employees, yet they also stated that the training is not mandatory. Three of the 10 have more than 10,000 FTE located in multiple sites and a limited number of staff doing records management work full-time. Given the size of some of the agencies and their limited records management resources, and without more detailed or verifiable metrics, we believe it is unlikely that large numbers of their employees have had the training they need to perform their records management responsibilities.

The majority of agencies reported that they still rely on classroom-based training, despite having few, if any, staff members with full-time records management responsibilities. For many of them, this is but one of several training options they employ, but for others it is the only one. The advantage of classroom-based training is that participants can interact with the instructor and each other. The drawbacks are the space and time limits and the expenses (travel costs, for example). These constraints are significant and can limit the effectiveness of the training, particularly in very large Federal agencies with employees in multiple locations, if it is the only training option available. Indeed, large agencies that use solely this method for training reported the lowest percentage of employees trained.

Agencies that reported the highest percentages of employees trained stated that they used the self-directed computer-based training method, or CBT. In a number of cases agencies selected this method as one of several. Fifty-eight out of 86 agencies that reported training 81 to 100 percent of their employees selected CBT as one of their training options, and 12 said they rely solely on CBT. The remaining agencies largely indicated they also provide classroom and/or customized NARA training to

<sup>&</sup>quot;Lieberman, Collins Question DHS on 'Shocking,' High Level of Contractors in Department Workforce" (2/24/2010) -- http://hsgac.senate.gov/public/index.cfm?FuseAction=Press.MajorityNews.

their employees. However, given agencies' resource limitations and the low numbers (see the introduction to this section) of agency personnel who take NARA training, it seems clear that such high training percentages are simply unreliable as reported.

Computer-based training is a practical method to train employees, particularly for agencies with a large number of employees located in numerous sites. CBTs have limitations, however: they rely on an agency's technical infrastructure; administration and participation can be difficult; there is no socialization component; some aspects of records management can't be taught on-line (at least not well); and, importantly, participants can't ask specific questions and get an immediate response. In recent years, agencies have developed an array of CBTs to satisfy mandatory requirements on a variety of topics, some of which may touch on records management (protecting personal privacy and information security, for example) and some that may not (influenza epidemic). The records management CBT therefore has to compete for employees' attention.

Another issue is that a CBT may be limited to high-level records management concepts only, and it may not include tailored information or the tools employees need to practice good records management in their daily work. Some agencies use, or have adapted, a NARA training course called *Records Management for Everyone* as the basis for their CBT. *Records Management for Everyone* is a basic introduction to Federal records management concepts. It covers the definition of Federal records and agencies' records management points of contact (Records Officers, Records Liaison Officers, and files custodians). The briefing does not discuss schedule implementation, nor does it provide practical means for participants to manage their records. If agencies rely solely on this briefing, employees will not have the information and tools they need to properly manage their records.

People including Directorate and Secretariat level staff don't take it seriously – again, GAO has to make this important before these folks mandate that it become relevant – we also are not funded adequately at all levels to make this a priority.

Respondent Comment

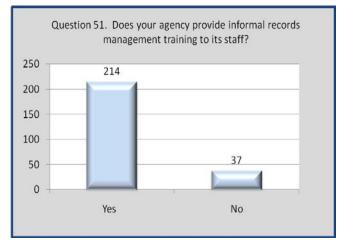
On a positive note, according to the self-assessment responses the majority of agencies that conduct formal records management training do so at least annually, if not more frequently. However, only slightly more than half (56%) of the agencies that conduct formal training evaluate its effectiveness (question 49). While 15 agencies report they use inspections to evaluate the effectiveness of training, given the limited records management resources in most agencies it seems unlikely this practice is widespread. The majority depend on feedback from forms and test results to evaluate their training programs. These methods have limited usefulness, primarily because they usually capture data immediately after the completion of a training session. Unless agencies perform follow-up evaluations, at some remove from the initial training session, there is no way to know whether participants use what they learn to practice good recordkeeping.

#### **Informal Training**

Informal training is whatever falls outside the above definition of formal training. It generally is more ad hoc and "passive" (information posted on web sites, for example), and it requires employees' initiative to be effective. Informal training is useful, but it should not be the sole means to provide records management training to employees.

#### **Overall Response**

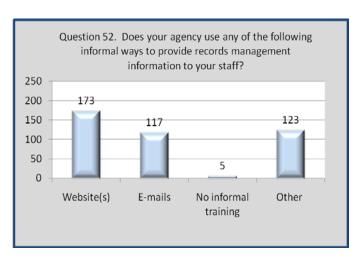
Most agencies (85%) provide informal records management training (question 51). Of the 251 agencies that completed the self-assessment, 140 (56%) provide both formal and informal training to their employees; 74 (30%) provide only informal training; 10 (4%) conduct only formal training; and 27 (11%) do not provide training of any kind. Of this last group, 7 agencies have between 1,000 and 9,999 FTE, and the remaining 20 have less than 1,000 FTE.



Most agencies use their intranet sites or broadcast e-mails to distribute records

management information. The intranet can be useful for this purpose; however, employees must look for the information and be motivated to use it. The information must be regularly updated, prominently posted, and easily accessible. If it isn't, the intranet can be one of the least effective records management training vehicles.

Broadcast e-mails are similarly problematic. Workers are inundated daily with large numbers of messages from multiple sources. Broadcast e-mails about records management topics may be overlooked, ignored, or deleted without being opened.



The examples of intranet posts and broadcast e-mails highlight the difficulties of informal training. It is a hands-off approach involving little, if any, interaction with intended recipients. There is also no way to be sure that employees read and use the information as intended. If done well, informal training can aid an agency's training efforts, but it is not a substitute for a more formal program.

The survey asked agencies about the topics they address in their records management training, whether formal or informal (question 53). Of the 74 agencies that provide informal

training only, 24 said they cover all topic areas. Of the 140 that offer both formal and informal training, 93 said they cover all topics. This question lumped together formal and informal training, so we can't determine what topics agencies tend to address formally or informally. We can conclude, however, that less than half of the agencies who took this self-assessment have some type of training that incorporates all important records management topics. We did not evaluate agencies' training materials or curriculum, so we can't assess whether the topics are addressed effectively, or whether an agency's records management training program has had a positive impact on its overall recordkeeping practices.

We listed nine topics (and Other) for agencies to choose from in this question. Of these, the vital records topic was chosen least. Vital records received similar short shrift in the related question (question 59) in the following section, about topics covered in training for Records Liaison Officers. Item 10 in *Federal Continuity Directive 1 (FCD 1)*, issued in February 2008, requires agencies to have a vital records training program for all staff. It also says the training should focus on identifying, inventorying, protecting, storing, accessing, and updating the agency's vital records. As we discussed in the Vital Records section of this report, it appears that this function in some agencies is divorced from the records management program and thus not a concern for its records managers. The results for this section, focusing on agency training, support that finding.

Another question in this section concerned resources or contacts that agencies provide for employees who need records management guidance (question 55). The Records Officer or records management staff are the primary points of contact in most agencies. Some agencies even have records management hotlines, dedicated e-mail boxes, and helpdesks. Many create and distribute brochures, display posters, and hold records awareness events. Agencies use their web sites to post FAQs and other helpful information. Interestingly, a number of agencies direct employees to the NARA web site or to their agency's NARA contact in addition to, or in lieu of, internal points of contact.

To summarize, Federal agencies are generally aware of the need to provide records management training to their employees. Some large Cabinet-level departments have developed mandatory computer-based training for their employees. Other agencies, including some Cabinet-level departments, are in the process of developing CBTs. A number of agencies use, or have adapted, NARA's *Records Management for Everyone* as their CBT. However, this briefing is only an introduction to records management concepts. It does not contain specific, targeted tools that staff can use to manage their records. If most employees take only this training, it is unlikely that an agency's overall records management practices will improve. While participation levels appear higher for agencies that make their records management training mandatory, we can't verify these numbers. Finally, agencies across the spectrum, from those with strong training programs to those who have no program in place and no plans to implement one, cite the lack of resources and records management staff as principle factors in their deficiencies.

#### Records Management Training - Records Liaison Officers (RLOs)

#### **Formal Training**

As stated in Section 1: Records Management Program, 36 CFR Part 1220.34 requires agencies to assign records management responsibilities within each program and administrative area. Generally, these individuals are called Records Liaison Officers (RLOs), although some agencies have established different titles for them.

Often the duties of RLOs are assigned to administrative personnel with other program responsibilities. Most have no background or training in records management. It is therefore crucial that agencies have formal records management training programs in place to teach them the necessary skills to perform this function.

For the following questions, formal records management training for Records Liaison Officers is defined as training that communicates standardized information to improve the records management

knowledge, skills, and attitudes of RLOs. Training can be either classroom or distance-based, but it must:

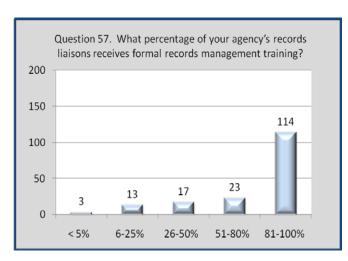
- Be regular (occurring more than just once);
- Be repeatable and formal (all instructors must provide the same message, not in an ad hoc way);
   and
- Communicate the agency's vision of records management.

#### **Overall Response**



More agencies (68%) reported here (question 56) that they give formal training to their RLOs than said they provide it for the rest of their employees (60% - see question 42). However, responses in other sections of the RMSA contradict this result. Twenty-three agencies they provide (14%)that said management training to RLOs indicated earlier that their agency had no RLOs (see question 2). This anomaly can't be explained from the data; the agencies span all sizes and type. followed up with these agencies concerning this discrepancy. One respondent said he answered "no" to question 2 because the staff designation

is different in his agency, although they do have a position with essentially the same roles and responsibilities. Others wrote they mistakenly answered "yes" to the question concerning formal records management training for RLOs. Still others said that while there was an RLO position, it is currently vacant. Considering this follow-up information, the overall positive response rate to this question is likely lower than the results indicate.



Subsequent questions (questions 58 - 61) asked for more specific detail about formal training for RLOs. Interestingly, the number of positive responses drops steadily as the questions progress. For example, while 170 agencies out of 251 say they provide formal training to their RLOs (question 56), only 125 say it is regular and occurs once a year or more (question 61). Of the 122 agencies that have instituted mandatory training (question 58), 95 reported they trained 80% of their RLOs, and 10 reported that fewer than 50% of the RLOs were trained.

Some agencies (19) said they have trained 81 to 100 percent of their RLOs despite the fact that the training is not mandatory. Eight of these agencies have 1,000 - 9,999 FTE; 3 have more than 10,000 FTE. One agency relies solely on computer-based training. The others use a mix of delivery systems, primarily instructor-led, in-person workshops and one-on-one training. We note that as a general rule, one-on-

one training tends to be more ad hoc and less formal than training given in more structured delivery environments such as CBTs, webinars, and classrooms.

Eight agencies, most of them with less than 1,000 FTE, said they trained 81 to 100 percent of their RLOs but did not offer training regularly. We believe that in today's Federal work environment, with its reliance on rapidly changing technology, RLOs must receive records management training at least annually to keep current with significant changes to records management policies and practices in the Federal Government. Six agencies said they

Records Liaison training is helpful – but really the program is understaffed.
Record[s] training though is not as helpful as having resources needed to administer the program or (at least) technology that makes it a brainless process for end-users.

**Respondent Comment** 

provided mandatory training to more than 80 percent of their RLOs, but that they had presented the training less than once a year. Two of them have more than 1,000 FTE, and two have more than 10,000 FTE. The extended time between training sessions increases the likelihood that new RLOs are not trained promptly and may not be able to adequately carry out their records management responsibilities.

#### **Informal Training**

Informal training, as we discussed previously, is training that does not meet the definition of formal training.

#### **Overall Response**

Slightly fewer agencies have informal training for their RLOs (question 62) than for all employees (question 51). As we mentioned earlier in that discussion of agency training for all employees, most informal training takes the form of information posted on web sites and broadcast e-mails. The same limitations -- primarily the fact that is up to the employee to seek out and benefit from these training tools -- apply to informal training for RLOs.

Most agencies' RLO training includes records retention, records management roles and responsibilities, and identifying Federal records. We note that in many cases the training does not include some other important elements. For example, of the 157 agencies that have formal and informal RLO training, only 103 of them cover all topic areas. Seven of 13 agencies that have formal RLO training only and 13 of the 51 agencies that have informal training only, cover all topic areas. The topics chosen least include e-mail and vital records. The self-assessment indicates that, in sum, fewer than half of all



agencies train RLOs on all the important records management topics.

We note also that this deficiency in vital records training aligns with the findings in Section 5: Vital Records, where we see that 30 percent of agencies' records management staff are not involved in identifying their agency's vital records.

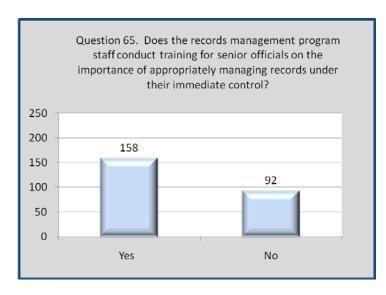
#### **Records Management Training - Senior Officials**

The CFR requires agencies to provide records management training to all employees including senior officials. The importance of training this group cannot be overstated. First of all, many records created by these individuals have permanent historical value, and these records have to be managed and maintained appropriately. Second, the support of senior officials for their agency's records management program is a critical factor for its success. Conversely, a lack of active support by senior officials can mean the program's failure. The results of the RMSA support this assertion.

The questions in this portion of the RMSA address whether senior officials receive records management training and, if so, what topics are covered.

#### **Overall Response**

We compared agencies' responses to question 32 (see Section 4: Records Disposition), asking if they conducted exit briefings for senior officials, to their responses to question 63 in this section, which asks if they have training for senior officials. We found that 126 agencies answered "yes" to both questions. Several agencies commented that any records management training is provided during orientation and exit briefings only. In some agencies the training is done by human resources personnel or the General Counsel's Office, and not the Records Officer.



Our review of agencies' comments reveals that in many cases, training for senior officials is optional. Often senior officials do not attend training sessions, choosing instead send subordinate administrative staff. This may be sufficient where some types of records are concerned (general administrative files, for example), although we envision several scenarios where it may not. For example, many senior officials use mobile devices that electronic their administrative staff can't access. The officials may not be aware of their recordkeeping responsibilities for those types of records, and their administrative

staff may not be able to intervene in such cases. Senior officials may also have personal e-mail accounts that, again, no one else can access. If they do not know to distinguish between personal records and Federal records, any Federal records they create in this way may not be managed appropriately.

The most striking result of the questions involving training for senior officials is the significant number (38%) of large agencies (1,000 or more FTE) that do not provide this training. Nearly half of agencies in this group have well over 10,000 FTE. This statistic is troubling because these officials create and maintain some of the most important records of their agencies. Without training, these records are put at risk. Also, the absence of an informed cadre of senior officials can have a negative impact on an agency's records management program. If leadership does not understand the relevance and importance of good records management, they will be less likely to adequately support, fund, or staff

the programs. The interest level of senior officials, or lack thereof, in the recordkeeping practices of their agency directly informs how these practices are implemented.

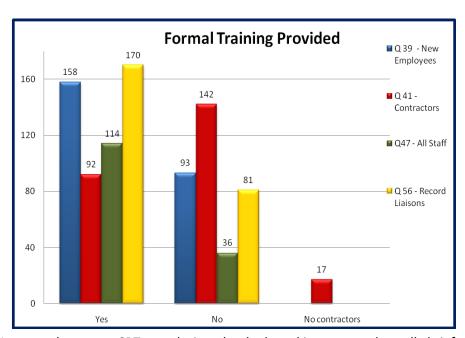
We asked agencies that provide records management training to senior officials about the topics they typically cover, listing those that we felt were of primary importance to these senior managers (see question 66). Only 68 agencies cover all topic choices in their training. A surprising number of agencies (30), 7 of which have more than 10,000 FTE, do not cover e-mail in their training, and 86 do not discuss the alienation of Federal records. These topics should be crucial elements of records management training for senior officials, especially political appointees. The training must also be mandatory. A training package for senior officials, however comprehensive, is not useful unless they participate (willingly or not). Records created by these officials are more likely to have permanent historical value, and an agency's failure to require this training can lead to dire consequences for the historical record.

#### Summary – Section 6

The findings for this section underscore the issues identified in earlier sections. We see that, broadly speaking, most agencies are meeting the requirement to train their employees. However, there are serious problems that must be addressed.

Many agencies rely on their intranet sites as training tools for their employees. This method depends entirely on an employee's interest in practicing good records management. They have to know where to find the information they need, understand how to use it, and be willing to practice what they learn.

Agencies have also deployed computer-based training (CBT), which can be an effective way to reach employees in large agencies



located in numerous sites. However, by nature CBTs are designed to be broad in scope and usually brief (generally an hour or less). Many agencies have adapted NARA's *Records Management for Everyone* CBT, which focuses on records management concepts in a general sense but for practical reasons does not contain specific or tailored tools to implement good records management.

The training programs in many agencies do not cover some important records management topics, including e-mail or vital records. This is not surprising considering the findings for Sections 3 and 5 (Electronic Records and Vital Records). Records schedule implementation is another common, and important, omission.

Many agencies reported sending employees to NARA's records management training. This is positive; however NARA's training is also necessarily focused on broader records management concepts, and mainly for time constraints it can lack targeted information or tools that participants can use in their work specifically. Moreover, the number of Federal employees trained by NARA is extremely low considering the size and scope of the Federal Government. The burden, then, falls on the agencies to provide adequate and useful training to their employees, regardless of location or job title.

Most agencies rely on evaluation forms to assess the effectiveness of their training programs. The forms are usually completed immediately after a training session. We think that a better gauge of what participants learned is how well they put the information into practice. The best way to determine this is follow-up by training staff, through site visits or inspections sometime after the completion of the training. Due to resource shortages in most records management programs, it is unlikely that this happens on a regular or widespread basis.

Agencies provide marginally more records management training to RLOs, although many are still deficient in this area as well. We recall the finding in Section 1: Records Management Program, that most RLOs do not have these duties in their position descriptions. Instead, they are often program employees with additional duties (including records management) as assigned. Unless records management is more central to their position descriptions and performance evaluations, they may not have a strong interest in it. It follows that if the training for RLOs in these situations is not mandatory, they may not feel compelled to take it.

Training for senior officials continues to be a major weakness in agency records management programs. While many agencies offer this training, it is usually not required and is likely to be incorporated as only one element of a senior official's orientation or exit briefing. In some cases, some office outside the records management program – personnel, for example – provides the little training they receive. The lack of trained senior officials has broad ramifications. Senior officials establish a culture in their agencies across all programs including records management. If they do not see the value of good records management and do not practice it in their own work, it is unlikely that their employees will do so either. These senior officials will also probably not provide adequate resources for the records management program.

#### Conclusion

NARA distributes the annual mandatory Records Management Self-Assessment to gather data we can use to determine the current state of Federal records management. We want to identify shortcomings and provide guidance for moving forward. We wish to acknowledge the efforts of the agency records officers who responded to the RMSA, for the time and consideration they gave to the survey and for their efforts overall to make their records management programs compliant under Federal regulations.

However, the RMSA leaves no doubt that many of these agency records officers are struggling, with inadequate training, personnel, resources, and support from their senior managers. To run briefly through the six topical sections of this report:

- In Section 1: Records Management Program, we find that many agencies do not have full-time records management personnel -- noting in particular the wide range of job titles our respondents have, and the lack of a standard job classification for Federal records managers that might help alleviate this -- or adequate resource levels for their records management programs;
- In Section 2: Records Management Program Activities, we find some positive data in the percentages of agencies who conduct regular program evaluations and brief senior managers on the results, but we also are compelled to stress the importance of annual, formal program evaluations because over 50% of the respondents are not doing this;
- In Section 3: Electronic Records, we encounter disturbing data about the exclusion of records management personnel from the development of new electronic systems; the impractical and ineffective practice among agencies to rely on "print and file" policies to manage e-mail records; and the equally mistaken reliance on IT staff and system backups as a means of preserving electronic records;
- In Section 4: Records Disposition, we revisit the deficiencies in many agency programs in the proper disposition and timely transfer of electronic records in particular;
- In Section 5: Vital Records, we are generally encouraged by agencies' efforts to identify vital records and incorporate them into continuity planning, but we find that this function resides often solely within emergency management programs. We also see that 50% of agencies are not conducting annual reviews of their vital records programs; and
- In Section 6: Training, we see a heavy reliance on "passive" training tools; a widespread dearth of formal training for staff (and contractors) at all levels, notably senior officials; training that slights or neglects altogether important records management topics including vital records; and a lack of effective and long-term evaluation mechanisms.

In this report we offer recommendations to agency liaisons and the Federal records community at large. We also discuss concrete steps that we (NARA) must take to fulfill our agency mission as leaders in this effort. We will also plan for future RMSAs to build on the results of this one. However, there is a crucial underlying issue to all these problems that, if not addressed, will hamper any work we do following this or any RMSA: the resources allocated to records management as currently practiced in Federal agencies is insufficient to accomplish this important work.

We addressed this in our introductory section, Federal Records Management – Demographics. We explored the number of full-time records management personnel in agencies compared to their total

numbers of FTEs and duty stations. As we discussed, the data from this section of the RMSA has implications for every other topical section. The results varied – agencies of every size fell into every risk category, and sometimes the scores of component units of the same agency were very far apart. We also have to view some individual responses skeptically, as they included in their accounting (and they admit this in their own comments) personnel with only part-time records management duties.

The figures are telling. We see agencies reporting a thousand or more duty stations, and many with 10,000 or more FTE. The majority reported having between 1,000 and 9,999 FTE, and most of this group said they have under 10 full-time records management personnel. Three agencies with over 10,000 FTE said they do not have any full-time records managers at all. We ended up with a baseline figure of one (1) full-time records manager for every 1,460 full-time Federal employees, though we think even this may be generous considering how many said they were counting part-time records management staff in their totals.

Training was our special topic focus for the 2010 RMSA. This section presents a mixed picture. As the trend towards desktop-level records management continues, senior employees to line staff do not have adequate records management awareness and training to meet their responsibilities. The result is a scenario where the historical record often depends on individual agency personnel making records management decisions. We need to improve records management awareness and training across the Federal Government while developing automated tools to manage records to support business needs, protect rights and assure accountability, and to preserve the historical record.

Any progress towards a solution involves two main areas of actionable discussion. First, senior officials must increase their awareness and support of records management. They must be held to their mandate as agency leaders to establish and maintain a strong records management program. Title 44 U.S.C. Chapter 31 § 3101-3102 directs the head of each Federal agency, in cooperation with GSA and NARA, to "make and preserve records containing adequate and proper documentation..." and "establish and maintain an active, continuing program for the economical and efficient management of the records of the agency." While agency heads necessarily delegate the management of program functions, the ultimate responsibility for agency activities rests with them.

Second, NARA must take the lead in working creatively with agencies to improve the poor results we see in the RMSA data. While resources are a factor in success, the crushing volume of records and the technological issues associated with them – formats, social media, cloud computing – require us to reassess our current models and practices. Agency records management programs must increase their scope and collaborate across their organizations to meet the records management challenge. This includes senior program officials, Chief Information Officers, General Counsels, Inspector Generals, and many other stakeholders.

The costs and consequences of inaction or reliance on current practices are great and will have a severe adverse impact over the longer term. Non-compliant records management undermines the ability of Federal agencies to efficiently conduct their business; undermines Government accountability and citizens' rights and interests; and jeopardizes the historical record. This is unacceptable to NARA as the institution charged with safeguarding and preserving the records of our Government. It is also unacceptable to everyone interested in effective records management, from Federal records officers, to researchers, to members of the public. We encourage Federal records officers to share these results

with their senior management and work with NARA to make the changes needed to address the shortcomings identified in this report.

#### **Recommendations for Executive Action**

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

#### **Resources Management**

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

#### **Records Management Program - Activities**

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

#### **Electronic Records**

- Agencies must ensure compliance with the regulations in 36 CFR Part 1236 including that:
  - official e-mail messages are preserved in appropriate recordkeeping systems;
  - records management functionalities are integrated into all new electronic systems; and
  - records are maintained in usable formats through their entire lifecycle.
- The Federal Records Council<sup>12</sup> and the Chief Information Officers (CIO) Council<sup>13</sup> should partner to raise awareness of the importance of agency records management and IT staffs working

<sup>&</sup>lt;sup>12</sup> The Federal Records Council is an interagency advisory group consisting of Cabinet-level records officers and other information management professionals that provides advice and support to NARA and OMB on Federal records and information management issues.

- cooperatively to integrate records management functionalities into electronic systems, and identify and develop IT solutions to electronic records management problems;
- NARA guidance and training should include more detailed and practical information regarding best practices for implementation strategies;
- Agencies must recognize that electronic recordkeeping is a joint responsibility of records management and IT staff;
- Per existing guidance including OMB Circular A-130, "Management of Federal Information Resources," agencies should strive to better incorporate records management and archival functions into the design, development, and implementation of information systems; and
- NARA should work with OMB to ensure records management is included in the design of information systems and built into the IT governance process.

#### **Records Disposition**

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

#### **Vital Records**

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

#### **Training**

 NARA should develop detailed training standards that address records management training via multiple delivery modes;

 Agencies should ensure that records management training for employees at all levels in their organization is mandatory, delivered at least annually, and contains practical tools to implement records schedules and ensure good recordkeeping practices;

<sup>&</sup>lt;sup>13</sup> The Chief Information Officers (CIO) Council serves as the principal interagency forum for improving practices in the design, modernization, use, sharing, and performance of Federal Government agency information resources. The Council's role includes developing recommendations for information technology management policies, procedures, and standards; identifying opportunities to share information resources; and assessing and addressing the needs of the Federal Government's IT workforce.

- Agencies should develop valid metrics for their records management training, regardless of the delivery system they use, to determine the number of employees who complete the training;
- Agencies should develop viable methods to evaluate the effectiveness of their training. This can include follow-up site visits and inspections/audits;
- Agencies should ensure they have sufficient numbers of trained records management staff with fulltime records management responsibilities to develop, oversee, and audit their training programs;
   and
- Agencies should ensure that senior-level officials receive records management training appropriate to their position.

#### **Policy**

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



# APPENDIX I National Archives and Records Administration Records Management Self-Assessment 2010

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score <b>Max 100 pts</b>
Department of Agriculture	·	•	•	·	·	•	·
Agricultural Marketing Service	12	2	2	18	0	6	40
Agricultural Research Service	12	15	6	14	0	13	60
Animal and Plant Health Inspection Service	12	2	2	11	0	10	37
Department Level	12	2	4	13	6	13	50
Economic Research Service	11	15	6	17	0	6	55
Farm Service Agency	12	5	2	11	4	14	48
Food and Nutrition Service	12	2	6	10	4	6	40
Food Safety and Inspection Service	9	9	2	15	2	13	50
Foreign Agricultural Service	12	2	2	13	0	14	43
Forest Service	14	9	2	18	8	19	70
Grain Inspection, Packers and Stockyards Administration	12	2	2	9	6	6	37
National Agricultural Statistics Service	12	8	4	9	2	16	51
National Institute of Food and Agriculture	14	2	2	11	8	22	59
Natural Resources Conservation Service	10	7	2	11	2	18	50

	M rogram	RM Activities	Electronic Records	Records Disposal	Vital Records	RM Training	Total Score
Ma	ax 14 pts	Max 15 pts	Max 15 pts	Max 18 pts	Max 8 pts	Max 30 pts	Max 100 pts
Office of Inspector General	11	13	9	9	7	7	56
Risk Management Agency	12	14	8	13	8	30	85
Rural Development	12	10	10	13	8	8	61
					Combi	ned Average Sco	ore 52
Department of Commerce							
Bureau of Economic Analysis	11	14	6	16	8	10	65
Bureau of Industry and Security	12	15	13	11	6	28	85
Bureau of the Census	14	10	6	9	6	23	68
<b>Economic Development Administration</b>	13	14	13	15	8	12	75
Headquarters Records Officer	11	0	6	12	0	4	33
International Trade Administration	13	2	12	8	8	4	47
Minority Business Development Agency	14	13	10	11	5	24	77
National Institute of Standards and Technolog	gy 13	14	11	15	8	25	86
National Oceanic and Atmospheric Administration	12	6	4	8	4	4	38
National Technical Information Service	14	15	14	7	8	25	83
National Telecommunications and Information Administration	4	7	8	12	6	13	50
U.S. Patent and Trademark Office	10	8	4	11	6	13	52
					Combi	ned Average Sco	ore 63

	RM Program	RM Activities	Electronic Records	Records Disposal	Vital Records	RM Training	Total Score
	Max 14 pts	Max 15 pts	Max 15 pts	Max 18 pts	Max 8 pts	Max 30 pts	Max 100 pts
Army Air Force Exchange Service	12	9	2	4	4	4	35
Defense Business Transformation Agency	0	0	2	0	0	2	4
Defense Commissary Agency	12	13	5	12	7	20	69
Defense Contract Audit Agency	14	8	9	7	6	14	58
Defense Contract Management Agency	6	5	12	4	2	7	36
Defense Finance and Accounting Service	9	5	6	13	6	13	52
Defense Information Systems Agency	12	13	9	2	6	17	59
Defense Intelligence Agency	14	11	2	5	0	23	55
Defense Logistics Agency	12	2	4	11	2	25	56
Defense Security Service	12	15	7	18	8	19	79
Defense Technical Information Center	12	10	2	9	8	27	68
Defense Threat Reduction Agency	12	12	4	10	8	28	74
Department of the Air Force	14	10	12	12	7	29	84
Department of the Army	11	13	8	11	8	19	70
Department of the Navy	10	2	4	18	3	28	65
Department of the Navy/U.S. Marine Corps	s 13	13	6	13	6	15	66
Joint Chiefs of Staff	14	15	12	16	6	23	86
Joint Warfare Analysis Center	10	9	2	2	1	26	50
Missile Defense Agency	12	9	9	3	5	28	66
National Geospatial-Intelligence Agency	11	10	2	11	2	24	60
National Reconnaissance Office	14	15	6	14	8	30	87
National Security Agency	14	15	6	13	6	27	81

	RM	RM	Electronic	Records	Vital	RM	
	Program	Activities	Records	Disposal	Records	Training	Total Score
	Max 14 pts	Max 15 pts	Max 15 pts	Max 18 pts	Max 8 pts	Max 30 pts	Max 100 pts
Office of Inspector General	13	7	8	12	0	4	44
Office of the Secretary of Defense	12	15	10	17	7	29	90
U.S. African Command	12	15	13	8	4	15	67
U.S. Central Command	12	15	7	11	6	30	81
U.S. European Command	10	9	2	5	0	15	41
U.S. Joint Forces Command	14	14	2	4	4	17	55
U.S. Northern Command	11	7	9	9	6	21	63
U.S. Pacific Command	12	5	4	2	0	22	45
U.S. Southern Command	11	11	11	6	3	11	53
U.S. Special Operations Command	9	11	6	2	8	14	50
U.S. Strategic Command	14	7	11	4	5	11	52
U.S. Transportation Command	12	15	6	4	0	13	50
					Combin	ned Average Sco	ore 60
Department of Education							
Headquarters Records Officer	11	5	2	14	0	17	49
					Total S	core	49

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Department of Energy							
Bonneville Power Administration	11	6	2	6	5	11	41
Department Level	14	15	5	16	8	25	83
<b>Energy Information Administration</b>	11	8	5	12	8	15	59
Federal Energy Regulatory Commission	10	8	2	9	8	6	43
National Nuclear Security Administration	14	15	7	12	4	18	70
Southeastern Power Administration	14	15	9	14	8	22	82
Southwestern Power Administration	14	15	14	16	7	14	80
Western Area Power Administration	13	15	8	13	7	28	84
					Combii	ned Average Sco	ore 68

I	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Department of Health and Human Services							
Administration for Children and Families	14	13	10	12	8	12	69
Administration on Aging	12	13	4	11	0	12	52
Agency for Healthcare Research and Quality	14	5	5	4	0	4	32
Centers for Disease Control and Prevention	14	15	10	16	8	30	93
Centers for Medicare and Medicaid Services	12	15	9	15	8	17	76
Department Level	12	11	2	12	0	8	45
Food and Drug Administration	14	13	11	15	8	26	87
Health Resources and Services Administration	on 14	14	14	15	8	29	94
Indian Health Service	10	10	4	6	0	21	51
National Institutes of Health	14	15	10	14	8	22	83
Office of the Secretary	12	11	2	4	0	8	37
Substance Abuse and Mental Health Service Administration	s 10	6	4	4	6	9	39

Combined Average Score 63

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Department of Homeland Security							
Department Level	12	6	2	17	8	19	64
Federal Emergency Management Agency	14	10	10	16	8	23	81
Federal Law Enforcement Training Center	10	6	11	11	0	11	49
National Protection and Programs Directorate/Visitor and Immigration Sta Indicator Technology	4 atus	0	4	6	6	13	33
Transportation Security Administration	14	6	2	11	3	28	64
U.S. Citizenship and Immigration Services	14	11	9	14	8	27	83
U.S. Coast Guard	12	4	10	11	7	7	51
U.S. Customs and Border Protection	12	6	6	5	2	25	56
U.S. Immigration and Customs Enforcemen	t 12	15	5	17	8	27	84
U.S. Secret Service	14	15	12	14	8	29	92
					Combii	ned Average Sco	ore 66
Department of Housing and Urban Developme					_	_	
Headquarters Records Officer	11	12	9	12	6	16	66
					Total S	core	66

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Department of the Interior							
Bureau of Indian Affairs	14	15	12	17	8	30	96
Bureau of Land Management	14	15	13	17	8	30	97
Bureau of Reclamation	14	15	13	17	8	29	96
Department Level	14	15	12	18	8	29	96
Indian Arts and Crafts Board	10	6	8	8	4	13	49
Minerals Management Service	14	15	10	17	8	29	93
National Business Center	14	15	14	18	8	29	98
National Park Service	14	15	10	13	8	29	89
Office of Surface Mining Reclamation and Enforcement	14	15	11	14	8	29	91
Office of the Special Trustee for American Indians	14	15	14	17	8	30	98
U.S. Fish and Wildlife Service	10	8	2	7	0	27	54
U.S. Geological Survey	14	13	11	17	2	30	87
					Combi	ned Average Sc	ore 87

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Department of Justice							
Bureau of Alcohol, Tobacco, Firearms and Explosives	12	6	6	11	6	8	49
Drug Enforcement Administration	12	9	8	9	4	16	58
<b>Executive Office for Immigration Review</b>	12	10	6	11	8	8	55
Executive Office for U.S. Attorneys	12	8	9	13	4	6	52
Federal Bureau of Investigation	12	8	10	9	8	19	66
Federal Bureau of Prisons	9	8	6	10	8	9	50
Headquarters Records Officer	14	12	6	18	6	20	76
National Drug Intelligence Center	13	11	9	9	7	23	72
Office of Justice Programs	8	2	2	12	7	15	46
U.S. Marshals Service	12	6	8	6	7	2	41
					Combi	ned Average Sco	ore 56
Department of Labor							
Administrative Review Board; Benefits Review Board	11	10	7	16	8	25	77
Bureau of International Labor Affairs	11	14	10	16	8	29	88
Bureau of Labor Statistics	11	13	2	17	8	25	76
Department Level	11	8	4	9	6	24	62
Employee Benefits Security Administration	12	7	8	14	6	8	55

	RM Program	RM Activities	Electronic Records	Records Disposal	Vital Records	RM Training	Total Score
	Max 14 pts	Max 15 pts	Max 15 pts	Max 18 pts	Max 8 pts	Max 30 pts	Max 100 pts
Employees' Compensation Appeals Board (Adjudicatory Boards)	12	11	9	16	8	18	74
<b>Employment and Training Administration</b>	13	11	4	17	8	24	77
Mine Safety and Health Administration	11	12	4	16	8	22	73
Occupational Safety and Health Administration	11	10	2	13	8	27	71
Office of Administrative Law Judges	11	12	9	9	8	25	74
Office of Congressional and Intergovernmental Affairs	9	10	4	12	8	18	61
Office of Disability Employment Policy	13	10	4	15	8	27	77
Office of Federal Contract Compliance Programs	9	13	4	13	8	24	71
Office of Job Corps	14	15	14	17	7	30	97
Office of Labor-Management Standards	11	10	2	13	8	23	67
Office of Public Affairs	10	6	4	11	8	27	66
Office of the Assistant Secretary for Administration and Management	11	11	4	18	8	30	82
Office of the Assistant Secretary for Policy	10	13	4	12	8	27	74
Office of the Chief Financial Officer	9	8	4	13	8	27	69
Office of the Inspector General	11	10	8	15	8	27	79
Office of the Secretary	11	4	4	13	8	18	58
Office of the Solicitor	11	10	6	15	8	27	77

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Office of Workers' Compensation Programs	11	10	4	13	8	27	73
Veterans Employment and Training Service	9	10	4	13	8	25	69
Wage and Hour Division	13	12	4	12	6	26	73
Women's Bureau	9	10	4	17	8	20	68
					Combin	ned Average Sco	ore 73
Department of State							
Headquarters Records Officer	14	13	10	18	8	24	87
					Total S	core	87
Department of Transportation							
Department Level	4	5	2	5	2	4	22
Federal Aviation Administration	10	6	0	7	8	17	48
Federal Highway Administration	12	15	7	12	8	21	75
Federal Motor Carrier Safety Administratio	n 12	11	12	13	8	19	75
Federal Railroad Administration	14	14	7	16	7	26	84
Federal Transit Administration	12	5	6	14	8	20	65
Maritime Administration	14	10	1	14	7	30	76
National Highway Transportation Safety Administration	12	13	11	17	7	22	82
Office of the Secretary	8	5	4	12	4	15	48

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	•	Total Score <b>Max 100 pts</b>
Pipeline and Hazardous Materials Safety Administration	4	5	2	11	5	4	31
Research and Innovative Technology Administration	6	0	2	13	0	4	25
Research and Innovative Technology Administration/John A. Volpe National Transportation Systems Center	13	14	12	4	7	6	56
St. Lawrence Seaway Development Corpora	ition 10	12	2	6	0	2	32
Surface Transportation Board	8	13	4	8	6	4	43
					Combir	ned Average Sco	re 54
Department of the Treasury						_	
Alcohol and Tobacco Tax and Trade Bureau	12	11	2	11	7	14	57
Bureau of Engraving and Printing	11	2	6	13	4	2	38
Bureau of the Public Debt	14	13	8	10	8	11	64
Financial Crimes Enforcement Network	14	0	1	9	2	4	30
Financial Management Service	12	15	6	14	6	26	79
Headquarters Records Officer	12	11	8	18	7	27	83
Internal Revenue Service	14	15	13	18	8	25	93
Office of the Comptroller of the Currency	12	11	9	16	6	9	63
Office of Thrift Supervision	12	9	8	13	7	4	53
U.S. Mint	14	15	14	15	8	17	83
					Combin	ned Average Sco	re 64

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts	
Department of Veterans Affairs								
Department Level	12	15	12	15	7	15	76	
Veterans Benefits Administration	14	7	14	13	4	25	77	
					Combin	Combined Average Score		
Executive Office of the President								
Council on Environmental Quality	8	6	10	10	2	26	62	
Office of Management and Budget	14	11	12	10	8	15	70	
Office of National Drug Control Policy	14	12	7	9	7	16	65	
Office of Science and Technology Policy	8	9	14	12	4	23	70	
Office of the U.S. Trade Representative	12	10	11	13	8	27	81	
					Combin	Combined Average Score		
Independent Agencies, Boards and Commissions								
Administrative Office of the U.S. Courts	14	11	10	11	7	4	57	
African Development Foundation	10	6	15	12	8	17	68	
Architectural and Transportation Barriers Compliance Board (Access Board)	4	7	2	0	4	2	19	
Armed Forces Retirement Home	10	9	12	8	7	6	52	
Barry M. Goldwater Scholarship and Excellence in Education Foundation	10	12	10	9	8	8	57	
Broadcasting Board of Governors	12	2	6	8	0	4	32	

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Central Intelligence Agency	14	11	11	15	0	22	73
Chemical Safety and Hazard Investigation Board	11	10	9	4	4	24	64
Commission of Fine Arts	4	0	4	4	2	9	23
Committee for the Purchase from People Who Are Blind or Severely Disabled (Ability One)	4	3	6	4	6	15	38
<b>Commodity Futures Trading Commission</b>	13	6	7	12	2	15	55
Congressional Budget Office	4	2	8	7	4	6	31
<b>Consumer Product Safety Commission</b>	12	4	6	10	6	4	42
Corporation for National and Community Service	12	10	2	6	8	7	45
Court Services and Offender Supervision Agency	12	13	2	5	8	27	67
Defense Nuclear Facilities Safety Board	8	6	5	4	2	7	32
<b>Environmental Protection Agency</b>	14	7	6	18	6	24	75
Equal Employment Opportunity  Commission	12	15	8	11	7	21	74
<b>Export-Import Bank of the United States</b>	4	0	2	9	4	4	23
Farm Credit Administration	12	12	8	14	7	8	61
<b>Federal Communications Commission</b>	13	12	8	12	8	26	79

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Federal Election Commission	8	2	7	6	8	4	35
Federal Housing Finance Board	12	10	6	14	8	17	67
Federal Labor Relations Authority	13	9	9	4	2	9	46
Federal Maritime Commission	9	2	6	12	8	6	43
Federal Mediation and Conciliation Service	10	6	2	11	2	4	35
Federal Mine Safety and Health Review Commission	12	6	9	5	8	2	42
Federal Reserve System, Board of Governors, and Federal Open Market Committee	12	15	13	17	8	27	92
Federal Retirement Thrift Investment Board	14	15	10	8	8	15	70
Federal Trade Commission	14	13	8	10	8	19	72
Government Accountability Office	14	11	13	12	7	27	84
Government Printing Office	10	0	2	3	0	4	19
Institute of Museum and Library Services	6	13	11	8	2	8	48
Inter-American Foundation	9	2	8	13	6	11	49
International Boundary and Water Commission (US/Mexico)	11	15	7	2	5	6	46
James Madison Memorial Fellowship Foundat	ion 4	2	12	11	7	30	66

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Japan-U.S. Friendship Commission	13	2	6	8	0	2	31
Library of Congress	11	7	9	3	2	23	55
Merit Systems Protection Board	8	0	4	6	2	2	22
Millennium Challenge Corporation	14	12	12	16	8	21	83
Morris K. Udall Scholarship and Excellence in National Environmental Policy Foundation	10	13	7	9	3	15	57
National Aeronautics and Space Administration	12	15	4	18	5	24	78
National Archives and Records Administration	11	2	10	11	8	4	46
National Capital Planning Commission	14	15	13	13	7	17	79
National Credit Union Administration	6	9	3	8	0	4	30
National Endowment for the Arts	12	0	4	10	8	2	36
National Endowment for the Humanities	8	0	4	13	0	4	29
National Indian Gaming Commission	10	2	4	10	0	7	33
National Labor Relations Board	13	14	8	13	8	20	76
National Mediation Board	11	14	13	7	8	8	61
National Science Foundation	13	14	9	17	8	17	78
National Transportation Safety Board	12	6	6	6	5	4	39
Nuclear Regulatory Commission	11	11	11	12	4	24	73
Occupational Safety and Health Review Commission	12	9	8	2	4	27	62

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
Office of Government Ethics	12	7	6	15	7	20	67
Office of Navajo and Hopi Indian Relocation	14	2	9	12	0	14	51
Office of Personnel Management	12	9	4	17	6	6	54
Office of the Director of National Intelligence	12	15	9	11	3	27	77
Overseas Private Investment Corporation	12	14	12	13	8	30	89
Peace Corps	10	0	2	10	2	7	31
Pension Benefit Guaranty Corporation	12	12	4	11	6	21	66
Postal Regulatory Commission	4	3	12	2	6	7	34
Presidio Trust	8	0	2	4	2	2	18
Railroad Retirement Board	12	9	2	10	2	4	39
Recovery Accountability and Transparency Board	4	2	7	6	2	0	21
Securities and Exchange Commission	8	8	4	10	6	2	38
Selective Service System	4	9	13	11	6	2	45
Small Business Administration	11	9	12	16	6	6	60
Social Security Administration	12	15	14	11	8	14	74
Tennessee Valley Authority	12	13	11	11	8	26	81
Trade and Development Agency	10	10	12	9	8	13	62
U.S. Agency for International Development	12	15	8	18	8	26	87

### Aggregate Scores by Section

	RM Program Max 14 pts	RM Activities Max 15 pts	Electronic Records Max 15 pts	Records Disposal Max 18 pts	Vital Records Max 8 pts	RM Training Max 30 pts	Total Score Max 100 pts
U.S. Commission on Civil Rights	12	8	6	2	8	14	50
U.S. International Trade Commission	13	15	14	17	8	29	96
U.S. Nuclear Waste Technical Review Board	10	0	8	5	7	11	41
U.S. Sentencing Commission	14	6	6	10	6	22	64
U.S. Tax Court	10	14	5	14	8	15	66



**Low Risk** 

# APPENDIX II National Archives and Records Administration Records Management Self-Assessment 2010

### Risk Categories and Total Scores

**Department of the Treasury** 

**Total Maximum Score 100 pts** 

Department of Defense	
Office of the Secretary of Defense	90
Department of Health and Human Services	
Centers for Disease Control and Prevention	93
Health Resources Administration	
Department of Homeland Security	
U.S. Secret Service	92
Department of the Interior	
Bureau of Indian Affairs	96
Bureau of Land Management	
Bureau of Reclamation	
Department Level	
Minerals Management Service	
National Business Center	
Office of Surface Mining Reclamation and Enforcement	
_	98

Office of Job Corps\_\_\_\_\_\_\_97

Internal Revenue Service \_\_\_\_\_\_\_93

## **Independent Agencies, Boards and Commissions**

Federal Reserve System, Board of Governors, and Federal Open  Market Committee	92
U.S. International Trade Commission	
Moderate Risk	
Department of Agriculture	
Agricultural Research Service	60
Forest Service	
Risk Management Agency	
Rural Development	61
Department of Commerce	
Bureau of Economic Analysis	65
Bureau of Industry and Security	85
Bureau of the Census	68
Economic Development Administration	
Minority Business Development Agency	
National Institute of Standards and Technology	
National Technical Information Service	83
Department of Defense	
Defense Commissary Agency	69
Defense Security Service	79
Defense Technical Information Center	68
Defense Threat Reduction Agency	
Department of the Air Force	84
Department of the Army	
Department of the Navy	65
Department of the Navy/U.S. Marine Corps	66
Joint Chiefs of Staff	86
Missile Defense Agency	66
National Geospatial-Intelligence Agency	60
National Reconnaissance Office	87
National Security Agency	81
U.S. African Command	
U.S. Central Command	
U.S. Northern Command	

Department of Energy	
Department Level	83
National Nuclear Security Administration	70
Southeastern Power Administration	82
Southwestern Power Administration	80
Western Area Power Administration	84
Department of Health and Human Services	
Administration for Children and Families	69
Centers for Medicare and Medicaid Services	76
Food and Drug Administration	87
National Institutes of Health	83
Department of Homeland Security	<i>C</i> 4
Department Level	
Federal Emergency Management Agency	
Transportation Security Administration	
U.S. Citizenship and Immigration Services	
U.S. Immigration and Customs Enforcement	84
Department of Housing and Urban Development	6.6
Headquarters Records Officer	66
Department of the Interior	
National Park Service	89
U.S. Geological Survey	87
Department of Justice	
Federal Bureau of Investigation	
Headquarters Records Officer	
National Drug Intelligence Center	72
Department of Labor	
Administrative Review Board Benefits Review Board	
Bureau of International Labor Affairs	88
Bureau of Labor Statistics	76
Department Level	
Employees' Compensation Appeals Board (Adjudicatory Boards)	74
Employment and Training Administration	77
Mine Safety and Health Administration	73

Occupational Safety and Health Administration	71
Office of Administrative Law Judges	74
Office of Congressional and Intergovernmental Affairs	61
Office of Disability Employment Policy	77
Office of Federal Contract Compliance Programs	
Office of Labor-Management Standards	
Office of Public Affairs	66
Office of the Assistant Secretary for Administration and Management	82
Office of the Assistant Secretary for Policy	74
Office of the Chief Financial Officer	
Office of the Inspector General	
Office of the Solicitor	77
Office of Workers' Compensation Programs	73
Veterans Employment and Training Service	69
Wage and Hour Division	
Women's Bureau	68
Headquarters Records Officer	87
Department of Transportation	7-
Federal Highway Administration	
Federal Motor Carrier Safety Administration	
Federal Railroad Administration	
Federal Transit Administration	
Maritime Administration	
National Highway Transportation Safety Administration	82
Department of the Treasury	
Bureau of the Public Debt	64
Financial Management Service	79
Headquarters Records Officer	83
Office of the Comptroller of the Currency	
U.S. Mint	83
Department of Veterans Affairs	
Department Level	76
Veterans Benefits Administration	77

<b>Executive Office of the President</b>	
Council on Environmental Quality	62
Office of Management and Budget	70
Office of National Drug Control Policy	65
Office of Science and Technology Policy	70
Office of the U.S. Trade Representative	81
Independent Agencies, Boards and Commissions	
African Development Foundation	68
Central Intelligence Agency	73
Chemical Safety and Hazard Investigation Board	64
Court Services and Offender Supervision Agency	67
Environmental Protection Agency	75
Equal Employment Opportunity Commission	74
Farm Credit Administration	61
Federal Communications Commission	79
Federal Housing Finance Board	
Federal Retirement Thrift Investment Board	70
Federal Trade Commission	72
Government Accountability Office	
James Madison Memorial Fellowship Foundation	
Millennium Challenge Corporation	83
National Aeronautics and Space Administration	78
National Capital Planning Commission	79
National Labor Relations Board	76
National Mediation Board	61
National Science Foundation	78
Nuclear Regulatory Commission	73
Occupational Safety and Health Review Commission	62
Office of Government Ethics	67
Office of the Director of National Intelligence	77
Overseas Private Investment Corporation	89
Pension Benefit Guaranty Corporation	66
Small Business Administration	60
Social Security Administration	74
Tennessee Valley Authority	
Trade and Development Agency	62

U.S. Agency for International Development	
U.S. Sentencing Commission	64
U.S. Tax Court	66
High Risk	
Department of Agriculture	
Agricultural Marketing Service	
Animal and Plant Health Inspection Service	
Department Level	
Economic Research Service	
Farm Service Agency	
Food Safety and Inspection Service	
Food Safety and Inspection Service	
Foreign Agricultural Service	
Grain Inspection, Packers, and Stockyards Administration	
National Agricultural Statistics Service	
National Institute of Food and Agriculture	
Natural Resources Conservation Service	
Office of Inspector General	30
Department of Commerce	
Headquarters Records Officer	33
International Trade Administration	47
National Oceanic and Atmospheric Administration	
National Telecommunications and Information Administration	50
U.S. Patent and Trademark Office	52
Department of Defense	
Army Air Force Exchange Service	35
Defense Business Transformation Agency	4
Defense Contract Audit Agency	58
Defense Contract Management Agency	36
Defense Finance and Accounting Service	52
Defense Information Systems Agency	59
Defense Intelligence Agency	55
Defense Logistics Agency	56
Joint Warfare Analysis Center	50
Office of Inspector General	44
U.S. European Command	41

U.S. Joint Forces Command	55
U.S. Pacific Command	45
U.S. Southern Command	53
U.S. Special Operations Command	50
U.S. Strategic Command	
U.S. Transportation Command	
Department of Education	
Headquarters Records Officer	49
Department of Energy	
Bonneville Power Administration	41
Energy Information Administration	59
Federal Energy Regulatory Commission	43
Department of Health and Human Services	
Administration on Aging	52
Agency for Healthcare, Research and Quality	32
Department Level	45
Indian Health Service	51
Office of the Secretary	
Substance Abuse and Mental Health Services Administration	39
Department of Homeland Security	
Federal Law Enforcement Training Center	
National Protection and Programs Director/Visitor and Immigration	33
Status Indicator Technology	
U.S. Coast Guard	51
U.S. Customs and Border Protection	56
Department of the Interior	
Indian Arts and Crafts Board	
U.S. Fish and Wildlife Service	54
Department of Justice	
Bureau of Alcohol, Tobacco, Firearms and Explosives	
Drug Enforcement Administration	
Executive Office for Immigration Review	
Executive Office for U.S. Attorneys	
Federal Bureau of Prisons	50

Office of Justice Programs	46
U.S. Marshals Service	41
Department of Labor	
Employee Benefits Security Administration	55
Office of the Secretary	58
Department of Transportation	
Department Level	22
Federal Aviation Administration	48
Office of the Secretary	
Pipeline and Hazardous Materials Safety Administration	31
Research and Innovative Technology Administration	
Research and Innovative Technology Administration/John A. Volpe  National Transportation Systems Center	
St. Lawrence Seaway Development Corporation	32
Surface Transportation Board	
Department of the Treasury	
Alcohol and Tobacco Tax and Trade Bureau	57
Bureau of Engraving and Printing	38
Financial Crimes Enforcement Network	30
Office of Thrift Supervision	
Independent Agencies, Boards and Commissions	
Administrative Office of the U.S. Courts	57
Architectural and Transportation Barriers Compliance Board (Access Board)	19
Armed Forces Retirement Home	
Barry M. Goldwater Scholarship and Excellence in Education Foundation	
Broadcasting Board of Governors	
Commission of Fine Arts	23
Committee for the Purchase from People Who Are Blind or Severely	
Disabled (Ability One)	
Commodity Futures Trading Commission	
Congressional Budget Office	
Consumer Product Safety Commission	
Corporation for National and Community Service	45
Defense Nuclear Facilities Safety Board	22
Export-Import Bank of the United States	
Federal Election Commission	35

Federal Energy Regulatory Commission	43
Federal Labor Relations Authority	46
Federal Maritime Commission	43
Federal Mediation and Conciliation Service	35
Federal Mine Safety and Health Review Commission	42
Government Printing Office	19
Institute of Museum and Library Services	48
Inter-American Foundation	49
International Boundary and Water Commission (US/Mexico)	46
Japan-U.S. Friendship Commission	31
Library of Congress	55
Merit Systems Protection Board	22
Morris K. Udall Scholarship and Excellence in National Environmental Policy Foundation	57
National Archives and Records Administration	
National Credit Union Administration	
National Endowment for the Arts	
National Endowment for the Humanities	
National Indian Gaming Commission	
National Transportation Safety Board	
Office of Navajo and Hopi Indian Relocation	
Office of Personnel Management	54
Peace Corps	31
Postal Regulatory Commission	34
Presidio Trust	18
Railroad Retirement Board	39
Recovery Accountability and Transparency Board	21
Securities and Exchange Commission	38
Selective Service System	45
U.S. Commission on Civil Rights	
U.S. Nuclear Waste Technical Review Board	41



#### **APPENDIX III**

### National Archives and Records Administration Records Management Self-Assessment 2010

### **Aggregate Scores Alphabetically**

. ,	Total Maximum Score 100 pts
Department of Agriculture	
Agricultural Marketing Service	40
Agricultural Research Service	
Animal and Plant Health Inspection Service	37
Department Level	50
Economic Research Service	
Farm Service Agency	
Food and Nutrition Service	
Food Safety and Inspection Service	50
Foreign Agricultural Service	
Forest Service	
Grain Inspection, Packers, and Stockyards	
Administration	
National Agricultural Statistics Service	51
National Institute of Food and Agriculture	
Natural Resources Conservation Service	
Office of Inspector General	
Risk Management Agency	
Rural Development	
Department of Agriculture	e Average Score 52
Department of Commerce	
Bureau of Economic Analysis	65
Bureau of Industry and Security	
Bureau of the Census	
Economic Development Administration	
Headquarters Records Officer	
International Trade Administration	47
Minority Business Development Agency	77
National Institute of Standards and Technology	86
National Oceanic and AtmosphericAdministration	
National Technical Information Service	83
National Telecommunications and	
Information Administration	
U.S. Patent and Trademark Office	52

**Department of Commerce Average Score** 

*63* 

### **Department of Defense**

Army Air Force Exchange Service	35
Defense Business Transformation Agency	
Defense Commissary Agency	
Defense Contract Audit Agency	
Defense Contract Management Agency	
Defense Finance and Accounting Service	
Defense Information Systems Agency	
Defense Intelligence Agency	
Defense Logistics Agency	56
Defense Security Service	79
Defense Technical Information Center	
Defense Threat Reduction Agency	74
Department of the Air Force	84
Department of the Army	
Department of the Navy	
Department of the Navy/U.S. Marine Corps	66
Joint Chiefs of Staff	86
Joint Warfare Analysis Center	50
Missile Defense Agency	66
National Geospatial-Intelligence Agency	
National Reconnaissance Office	
National Security Agency	
Office of Inspector General	44
Office of the Secretary of Defense	90
U.S. African Command	67
U.S. Central Command	81
U.S. European Command	41
U.S. Joint Forces Command	55
U.S. Northern Command	63
U.S. Pacific Command	
U.S. Southern Command	53
U.S. Special Operations Command	50
U.S. Strategic Command	52
II S Transportation Command	50

Department of Defense Average Score

60

Department of Education		
Headquarters Records Officer	49	
Department of Education Total Score		
Department of Energy		
Bonneville Power Administration		
Department Level		
Energy Information Administration		
Federal Energy Regulatory Commission		
National Nuclear Security Administration		
Southeastern Power Administration		
Southwestern Power Administration		
Western Area Power Administration		
Department of Energy Average Score		
Department of Energy Average Score Department of Health and Human Services	<b>50</b>	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families		
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging	52	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality	52 32	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality  Centers for Disease Control and Prevention	52 32 93	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality  Centers for Disease Control and Prevention  Centers for Medicare and Medicaid Services	52 32 93 76	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality  Centers for Disease Control and Prevention  Centers for Medicare and Medicaid Services  Department Level	52 32 93 76 45	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality  Centers for Disease Control and Prevention  Centers for Medicare and Medicaid Services  Department Level  Food and Drug Administration	52 32 93 76 45 87	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality  Centers for Disease Control and Prevention  Centers for Medicare and Medicaid Services  Department Level  Food and Drug Administration  Health Resources and Services Administration	52 32 93 76 45 87 94	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality  Centers for Disease Control and Prevention  Centers for Medicare and Medicaid Services  Department Level  Food and Drug Administration  Health Resources and Services Administration  Indian Health Service	52 32 93 76 45 87 94 51	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality  Centers for Disease Control and Prevention  Centers for Medicare and Medicaid Services  Department Level  Food and Drug Administration  Health Resources and Services Administration  Indian Health Service  National Institutes of Health	52 32 93 76 45 87 94 51	
Department of Energy Average Score  Department of Health and Human Services  Administration for Children and Families  Administration on Aging  Agency for Healthcare Research and Quality  Centers for Disease Control and Prevention  Centers for Medicare and Medicaid Services  Department Level  Food and Drug Administration  Health Resources and Services Administration  Indian Health Service	52 32 93 76 45 87 94 51 83	

Department of Homeland Security	
Department Level	64
Federal Emergency Management Agency	
Federal Law Enforcement Training Center	_ 49
National Protection and Programs	_ 33
Directorate/Visitor and Immigration Status Indicator Technology	
Transportation Security Administration	_ 64
U.S. Citizenship and Immigration Services	_ 83
U.S. Coast Guard	_ 51
U.S. Customs and Border Protection	_ 56
U.S. Immigration and Customs Enforcement	_ 84
U.S. Secret Service	_ 92
Department of Homeland Security Avera	age Score 66
Department of Housing and Urban Development	
Headquarters Records Officer	_ 66
Department of Housing and Urban Development To	otal Score 66
Bureau of Indian Affairs	96
Bureau of Land Management	
Bureau of Reclamation	_ 96
Department Level	
Indian Arts and Crafts Board	_ 49
Minerals Management Service	_ 93
National Business Center98	
National Park Service 89	
Office of Surface Mining Reclamation and	_ 91
Office of the Special Trustee for AmericanIndians	_ 98
U.S. Fish and Wildlife Service	54
U.S. Geological Survey	
Department of the Interior Average Scor	

epartment of Justice	
Bureau of Alcohol, Tobacco, Firearms and	
Explosives	
Drug Enforcement Administration	
Executive Office for Immigration Review	
Executive Office for U.S. Attorneys	
Federal Bureau of Investigation	
Federal Bureau of Prisons	
Headquarters Records Officer	
National Drug Intelligence Center	
Office of Justice Programs	
U.S. Marshals Service	
Department of Justice Ave	
epartment of Labor	
Administrative Review Board; Benefits	
Review Board	
Bureau of International Labor Affairs	
Bureau of Labor Statistics	
Department Level	
Employee Benefits Security Administration	
Employees' Compensation Appeals Board	
(Adjudicatory Boards)	
Employment and Training Administration	
Mine Safety and Health Administration	
Occupational Safety and Health	
Administration	
Office of Administrative Law Judges	
Office of Congressional and	
Intergovernmental Affairs	
Office of Disability Employment Policy	
Office of Federal Contract Compliance	
Programs	
Office of Job Corps	
Office of Labor-Management Standards	
Office of Public Affairs	
Office of the Assistant Secretary for	
Administration and Management	
Office of the Assistant Secretary for Policy	
Office of the Chief Financial Officer	
Office of the Inspector General	
Office of the Secretary	
Office of the Solicitor	

56

### Aggregate Scores

Office of Workers' Compensat	Office of Workers' Compensation Programs		
Veterans Employment and Tra	ining Service	69	
Wage and Hour Division		73	
Women's Bureau		68	
	Department of Labor Average Score		73
Department of State			
Headquarters Records Officer		87	
	Department of State Total Score		<i>87</i>
Department of Transportation			
Department Level		22	
Federal Aviation Administration	n	48	
Federal Highway Administration	on	75	
Federal Motor Carrier Safety A	dministration	75	
Federal Railroad Administratio	n	84	
Federal Transit Administration		65	
Maritime Administration		76	
National Highway Transportati Administration	ion Safety	82	
Office of the Secretary		48	
	ials Safety		
Research and Innovative Techi Administration	nology	25	
Administration/John A. Vo	•	56	
Transportation Systems Co			
St. Lawrence Seaway Development Corporation			
Surtace Transportation Board_		43	
	Department of Transportation Average	e Score	54

Department of the Treasury		
Alcohol and Tobacco Tax and Trade Bureau	57	
Bureau of Engraving and Printing		
Bureau of the Public Debt		
Financial Crimes Enforcement Network		
Financial Management Service		
Headquarters Records Officer		
Internal Revenue ServiceOffice of the Currency		
Office of Thrift Supervision		
U.S. Mint		
Department of the Treasury	64	
Department of Veterans Affairs		
Department Level	76	
Veterans Benefits Administration	77	
Department of Veterans Affairs	Average Score 76	
Executive Office of the President		
Council on Environmental Quality	62	
Office of Management and Budget	70	
Office of National Drug Control Policy	65	
Office of Science and Technology Policy		
Office of the U.S. Trade Representative		
Executive Office of the President		
Independent Agencies, Boards and Commissions		
Administrative Office of the U.S. Courts	57	
African Development Foundation	68	
Architectural and Transportation Barriers Compliance	19	
Armed Forces Retirement Home		
Barry M. Goldwater Scholarship and	57	
Broadcasting Board of Governors 32		
Central Intelligence Agency 73		
Chemical Safety and Hazard Investigation Board64		
Commission of Fine Arts		
Committee for the Purchase from People Who Are Blind	38	

Commodity Futures Trading Commission	55
Congressional Budget Office	31
Consumer Product Safety Commission	42
Corporation for National and Community Service	45
Court Services and Offender Supervision Agency	67
Defense Nuclear Facilities Safety Board	32
Environmental Protection Agency	75
Equal Employment Opportunity Commission	74
Export-Import Bank of the United States	23
Farm Credit Administration	61
Federal Communications Commission	
Federal Election Commission	35
Federal Housing Finance Board	67
Federal Labor Relations Authority	46
Federal Maritime Commission	43
Federal Mediation and Conciliation Service	35
Federal Mine Safety and Health Review Commission	42
Federal Reserve System, Board of Governors, and	92
Federal Retirement Thrift Investment Board	70
Federal Trade Commission	72
Government Accountability Office	84
Government Printing Office	19
Institute of Museum and Library Services	48
Inter-American Foundation	49
International Boundary and Water Commission (US/Mexico)	46
James Madison Memorial Fellowship Foundation	66
Japan-U.S. Friendship Commission	31
Library of Congress	55
Merit Systems Protection Board	22
Millennium Challenge Corporation	83
Morris K. Udall Scholarship and Excellence in National	57
Environmental Policy Foundation	
National Aeronautics and Space Administration	78
National Archives and Records Administration	46
National Capital Planning Commission	79
National Credit Union Administration	30
National Endowment for the Arts	36
National Endowment for the Humanities	29
National Indian Gaming Commission	33
National Labor Relations Board	76
National Mediation Board	61
National Science Foundation	78

#### Aggregate Scores

National Transportation Safety Board	
Nuclear Regulatory Commission	
Occupational Safety and Health Review Commission	
Office of Government Ethics	67
Office of Navajo and Hopi Indian Relocation	
Office of Personnel Management	54
Office of the Director of National Intelligence	7
Overseas Private Investment Corporation	89
Peace Corps	31
Pension Benefit Guaranty Corporation	60
Postal Regulatory Commission	34
Presidio Trust	18
Railroad Retirement Board	39
Recovery Accountability and Transparency Board	
Securities and Exchange Commission	38
Selective Service System	4
Small Business Administration	
Social Security Administration	7
Tennessee Valley Authority	8
Trade and Development Agency	6
U.S. Agency for International Development	
U.S. Commission on Civil Rights	
U.S. International Trade Commission	
U.S. Nuclear Waste Technical Review Board	
U.S. Sentencing Commission	6
U.S. Tax Court	6



#### **APPENDIX IV**

## National Archives and Records Administration Records Management Self-Assessment 2010

#### **Non-Respondent Agencies**

#### **Department of Commerce**

Economic Statistics Administration Executive Secretariat Office of the Inspector General

#### **Department of the Interior**

Office of the Solicitor

#### **Department of Transportation**

Office of Inspector General

#### **Executive Office of the President**

Office of Management and Budget\*

#### **Independent Agencies, Boards and Commissions**

Advisory Council on Historic Preservation
American Battle Monuments Commission
American Institute in Taiwan
Appalachian Regional Commission
Delaware River Basin Commission
Federal Deposit Insurance Corporation
Federal Judicial Center
General Services Administration
Harry S. Truman Scholarship Foundation
Marine Mammal Commission
National Council on Disability
Office of Special Counsel
U.S. Holocaust Memorial Council and Museum
United States Institute of Peace

<sup>\*</sup> Received after the deadline.

#### **APPENDIX V**

## NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA) FY 2010 RECORDS MANAGEMENT SELF-ASSESSMENT

#### **Records Management Program**

1. Has your agency formally designated a records officer with responsibility for carrying out its records management program? (36 CFR 1220.34(a)) (4 points)		
Answer Options	Response Percent	Response Count
Yes	100%	250
No		1
Number of respondents answering this question		251

A records liaison is a person responsible for overseeing a records management program in a headquarters or field office in cooperation with the agency records management officer. (A Federal Records Management Glossary, 1993 Second Edition)

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))

2. Does your agency have a network of designated records liaisons in each program and administrative area? (2 points)		
Answer Options	Response Percent	Response Count
Yes	80%	200
No	20%	51
Number of respondents answering this question		251

3. Are records management responsibilities explicitly stated in the position descriptions of records liaisons? (2 points)		
Answer Options	Response Percent	Response Count
Yes	41%	82
No	59%	117
Number of respondents answering this question		199

Federal agencies are required to issue a directive(s) that establish records management program objectives, responsibilities, and authorities for creating, maintaining, and disposing of agency records. (36 CFR 1220.34(c))

4. Does your agency have a records management directive(s)? (4 points)			
Answer Options	Response Percent	Response Count	
Yes	91%	228	
No (If no, go to # 7)	9%	23	
Number of respondents answering this question		251	

5. When did your agency last review or validate its records management directive to ensure it includes current guidance? (2 points)		
Answer Options	Response Percent*	Response Count
FY 2008-present	67%	153
FY 2002-2007	27%	62
FY 2001 or earlier	6%	13
Number of respondents answering this question		228

6. Please upload a copy of your records management directive. If you have more than one directive, e-mail them to rmselfassessment@nara.gov. (Non-scored)			
If the directive is at your	If the directive is at your agency website, please e-mail the web link to rmselfassessment@nara.gov.		
Answer Options	Response Percent*	Response Count	
Directive Received	72%	165	
Directive Not Received	28%	63	
Number of respondents answering this question 228			

#### **Records Management Program – Activities**

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))

7. Does your agency conduct evaluations of the records management practices of any of its program and administrative areas? (2 points)			
<b>Answer Options</b>	Response Percent Response Count		
Yes	78%	196	
No (If no, go to # 13)	Io (If no, go to # 13) 22% 55		
Number of respondents answering this question 251			

8. Who conducts the ev	raluations? (Non-scored)		
Responders could pick m	ore than one.		
Answer Options	Response Percent*	Response Count	
RM staff	72%	142	
Contractors or Consultants	17%	33	
Inspector General	24%	48	
Other, please specify	31%	61	
Number of respondents answering this question 196			

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

9. How often does your records management program staff evaluate the records management practices of one or more program and administrative areas? (2 points)		
Answer Options Response Percent* Response Count		
Annually	47%	92
Every 2-4 years	24%	46
Infrequently	28%	54
Never 2% 4		
Number of respondents answering this question 196		196

10. Are written reports prepared for each evaluation? (1 points)			
Answer Options	Response Percent	Response Count	
Yes	61%	119	
No	32%	63	
Not Applicable (Please explain)	7%	14	
Number of respondents answering this question		196	

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)

11. Are senior officials briefed on the findings of the records management evaluation? (2 points)			
Answer Options	Response Percent	Response Count	
Yes	86%	169	
No	14%	27	
Number of respondents answering this question 196			

12. Does the records management program staff follow up to determine if the office(s) have implemented necessary corrective action(s) or recommendation(s) for improvement? (2 points)		
Answer Options Response Percent Response Count		
Yes	84%	164
No	16%	32
Number of respondents answering this question 196		

A records inventory is a survey of agency records and nonrecord materials conducted primarily to develop records schedules and to identify various records management problems. (Basic Records Operations Workshop, Key Terms, revised August 2009)

13. Does your agency regularly inventory its records? (2 points)			
Answer Options	Response Percent	Response Count	
Yes	63%	158	
No (If no, go to # 15)	37%	93	
Number of respondents answering this question 251			

14. When was the last records inventory conducted? (2 points)			
Answer Options	Response Percent	Response Count	
0-2 years ago	80%	127	
2-5 years ago	16%	26	
6-10 years ago	2%	3	
More than 10 years ago	2%	3	
Number of respondents answering this question 15		159	

A file plan is a document containing the identifying number, title or description, and disposition authority of all paper, electronic, and other special media files held in an office. (Basic Records Operations Workshop, Key Terms, revised August 2009)

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))

15. Does your agency require that every program and administrative area maintain a file plan for organizing its records? (2 points)			
Answer Options	Response Percent	Response Count	
Yes	69%	173	
No	31%	78	
No week and a second and a second as	Number of many and outs are considerable associated 254		
Number of respondents answering this question 251			

#### **Records Management Program - Electronic Records**

16. Does your agency allow employees to use non-federal e-mail systems to conduct agency business? (36 CFR 1236.22(b)) (2 points)			
Answer Options	Response Percent	Response Count	
Yes	11%	27	
No 89% 224			
Number of respondents answering this question 251			

17. Does your agency block employees' access to non-federal e-mail systems to conduct agency business? (Non-scored)			
Answer Options Response Percent Response Count			
Yes	33%	72	
No 68% 150			
Number of respondents answering this question 222			

18. Does your agency ensure that e-mail Federal records are preserved in the appropriate agency recordkeeping system? (36 CFR 1236.22(b)) (2 points)		
Answer Options Response Percent Response Count		Response Count
Yes	53%	132
No	47%	119
Number of responden	251	

19. Does your agency regularly review staff compliance with the agency's e-mail preservation policies? (2 points)		
Answer Options	Response Percent	Response Count
Yes	33%	82
No (If no, go to # 21)	54%	136
Do not know (Go to #21)	13%	33
Number of respondents answering this question		251

20. How often does your agency monitor staff compliance to the agency's e-mail preservation policies? (2 points)		
Answer Options	Response Percent	Response Count
Every six months	6%	7
Every year	39%	44
Every two years	7%	8
More than every 2 years	4%	5
Other (please specify)	44%	50
Number of respondents answering this question		114

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

21. How often does your agency's records management program staff participate in design, development, and implementation of new electronic information systems? (2 points)		
Answer Options	Response Percent	Response Count
Always	19%	48
Most of the time	16%	41
Occasionally	26%	66
Rarely	19%	48
Never	19%	48
Number of respondents answering this question		251

• • •		ment controls are incorporated into the design, information systems? (36 CFR 1236.12 and OMB
Answer Options	Response Percent	Response Count
Yes	56%	140
No	44%	111
Number of respondent	ts answering this question	251

OMB Exhibit 300, Capital Asset Plan and Business Case Summary, is required for major information technology investments (OMB Circular A-11).

23. Does your agency's records management program staff approve the OMB Exhibit 300 or other business case(s) for all new electronic information systems? (1 point)		
<b>Answer Options</b>	Response Percent	Response Count
Yes	25%	63
No	56%	139
Not applicable (Please explain)	19%	48
Number of respondents answering this question		250

Agencies must design and implement migration strategies whenever records must be maintained and used beyond the life of the information system in which they were originally created or captured. This includes planning for the migration of records to a new system before the current system is retired; implementing hardware and software upgrades in such a way as to retain the functionality and integrity of the records; retaining the records in a usable format until their disposition date; the conversion of storage media to be compatible with current hardware and software; and maintaining the link between records and their metadata through conversion or migration. (36 CFR 1236.14)

24. Does your agency have established policies and procedures requiring that its electronic records are preserved in a usable format until their authorized disposition date? (2 points)		
Answer Options Response Percent Response Count		
Yes	69%	173
No	24%	61
Do not know (Please explain)	7%	17
Number of respondents answering this question 251		

#### **Records Management Program - Records Disposition**

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

	25. Of the total number of your agency's electronic information systems that contain records, what percentage of the records are covered by a NARA-approved records schedule? (3 points)		
Answer Options	Response Percent	Response Count	
More than 75%	۵7%	118	

Number of respondents answering this question		251	
Do not know	9%	22	
Less than 25%	21%	52	
25-49%	9%	24	
50-75%	14%	35	
More than 75%	47%	118	

26. When was the las	t time your agency submitted	a SF-115* to the National Archives? (3 points)
Answer Options	Response Percent	Response Count
FY 2010	35%	87
FY2008-2009	36%	90
FY2006-2007	8%	19
FY2001-2005	6%	15
FY2000 or earlier	10%	26
Do not know	6%	14
Number of respondents answering this question 251		
*Standard Form 115: Request for Records Disposition Authority		

## Pending SF 115s are those that have been accepted by NARA for processing, assigned a job number, but have not been signed by the Archivist of the United States.

27. Does your agency currently have any pending SF 115s at the National Archives? (2 points)		
Answer Options	Response Percent	Response Count
Yes	60%	150
No	40%	101
Number of respondents answering this question		251

## 28. As required by your agency's NARA-approved schedule, did your agency transfer any permanent non-electronic records to the National Archives via a SF-258\* in Fiscal Year 2009? (2 points)

Answer Options	Response Percent	Response Count
Yes	41%	102
No	37%	92
No permanent records were due to be transferred in FY 2009	20%	51
We did not transfer any permanent records because they are under a legal hold	2%	6
Number of respondents ar	nswering this question	251

<sup>\*</sup>Standard Form 258: Agreement to Transfer Records to the National Archives of the United States

## 29. As required by your agency's NARA-approved schedule, did your agency transfer any permanent electronic records to the National Archives via a SF-258\* in Fiscal Year 2009? (2 points)

Answer Options	Response Percent	Response Count
Yes	20%	50
No	49%	122
No permanent records were due to be transferred in FY 2009	29%	73
We did not transfer any permanent records because they are under a legal hold	2%	6
Number of respondents answering this question		251

<sup>\*</sup>Standard Form 258: Agreement to Transfer Records to the National Archives of the United States

## 30. Where does your agency store its inactive Federal records? Choose all that apply and indicate if each is compliant with the standards for records storage facilities as prescribed by 36 CFR 1234. (Non-scored)

(Non-scorea)	Posnonso Dorsont	Posnanca Count	
Answer Options	Response Percent	Response Count	
Agency Storage Facility		119	
Compliant	73%	87	
Not Compliant	27%	32	
<b>Federal Records Center</b>		224	
Compliant	96%	214	
Not Compliant	4%	10	
<b>Commercial Facility</b>		68	
Compliant	81%	55	
Not Compliant	19%	13	
Number of respondents answering this question		251	

The disposition of temporary records includes the use of off-site storage facilities, records destruction, and unauthorized disposals.

31. Does the records management program staff monitor the disposition of the agency's temporary records? (2 points)		
Answer Options	Response Percent	Response Count
Yes	85%	214
No	15%	37
Number of respondents answering this question 251		

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)

32. Does the records management program staff conduct exit briefings for senior officials on the appropriate disposition of the records, including e-mail, under their immediate control? (2 points)			
Answer Options	Response Percent	Response Count	
Yes	59%	149	
No (If no, go to #34)	41%	102	
Number of respondents answering this question		251	

33. Are the exit briefings documented? (2 points)			
Answer Options	Response Percent	Response Count	
Yes	80%	119	
No	20%	30	
Number of respondents answering this question		149	

34. 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? (2 points)			
<b>Answer Options</b>	Response Percent	Response Count	
Yes	69%	174	
No	31%	77	
Number of respondents answering this question		251	

#### **Records Management Program - Vital Records**

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))

35. Has your agency identified the vital records of all its program and administrative areas? (2 points)		
Answer Options	Response Percent	Response Count
Yes	69%	173
No	21%	53
Do not know (Please explain)	10%	25
Number of respondents answering this question		251

36. Is the records management program represented on the agency's Continuity of Operation (COOP) program team? (2 points)		
Answer Options	Response Percent	Response Count
Yes	74%	186
No	26%	65
Number of responder	nts answering this question	251

37. Is your vital records plan part of the Continuity of Operation (COOP) plan? (2 points)			
Answer Options	Response Percent	Response Count	
Yes	76%	191	
No	12%	31	
Do not know	12%	29	
Number answering thi	is question	251	

38. How often does your agency review its vital records program? (2 points)			
Answer Options	Response Percent	Response Count	
Annually	50%	125	
Every 1-3 years	17%	43	
Every 4-6 years	5%	12	
Every 7-10 years	1%	3	
Do not know	27%	68	
Number of responder	nts answering this question	251	

#### **Records Management Program - Training**

Records Management Training for Agency Staff and Contractors

Agencies are required to provide guidance and training to all agency personnel regarding their records management responsibilities, including identification of Federal records, in all formats and media. (36 CFR 1220.34(f))

39. Does your agency provide records management information to new employees as a part of their introduction to your agency? (2 points)		
Answer Options	Response Percent	Response Count
Yes	63%	158
No (If no, go to # 41)	37%	93
Number of respondents answering this question 251		

40. Which of the following methods do you use to provide records management information to new employees? (Choose all that apply) (Non-scored)		
Answer Options	Response Percent	Response Count
Responders could pick me	ore than one option	
Part of agency orientation	76%	121
Information on web site(s)	66%	106
Information packet	37%	59
Broadcast e-mail(s)	13%	34
Other (Please specify)	40%	64
Number of respondents	answering this question	160

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

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

41. Does your agency require its contractors to complete formal records management training? (2 points)		
Answer Options	Response Percent	Response Count
Yes	37%	92
No	56%	142
My agency does not have any contractors	7%	17
Number of respondents answering this question		251

The term staff includes full-time and part-time employees, temporary workers, interns, and contractors.

42. Does your agency provide formal records management training for staff other than the records liaisons, records officer, and senior officials about records management responsibilities, including the identification of Federal records in all media and formats? (3 points)

Answer Options	Response Percent	Response Count
Yes (If yes, go to Q44) No	60% 40%	150 100
Number of respondents answering this question		251

43. My agency does not provide formal records management training to staff because: (Choose all that apply) (Non-scored)			
Answer Options	Response Percent	Response Count	
Responders could pick mor	e than one option.		
Lack of funding and other resources	32%	33	
Lack of records management staff	52%	53	
Not needed, small microagency	25%	25	
Lack of senior level support	19%	19	
Other (Please specify) (For all answers go to # 51)	29%	30	
Number of respondents a	nswering this question	102	

44. What percentage of your agency's staff receives formal records management training? (2 points)			
Answer Options	Response Percent	Response Count	
Less than 5%	5%	7	
6-20%	21%	32	
21-40%	7%	11	
41-60%	5%	7	
61-80%	5%	8	
81-100%	57%	85	
Number of responder	150		

45. Is formal records management training mandatory for all agency staff? (Non-scored)			
Answer Options	Response Percent	Response Count	
Yes	57%	86	
No	43%	64	
Number of respondents answering this question 150			

46. Which of these ways do you use to provide formal records management training to your staff? (Choose all that apply) (Non-scored)		
Answer Options	Response Percent	Response Count
Responders could pick mo	ore than one option	
Classroom/in-person by agency's own staff	78%	118
Customized NARA records management training classes	50%	76
Webinars offered by the agency	14%	21
Self-directed, computer-based training	62%	94
Video-conferencing	17%	24
Other (please specify)	26%	39
Number of respondents answering this question		151

### Regular means that the training occurs more than just once.

47. Does your ag	47. Does your agency provide regular, formal records management training to all agency staff? (2 points)		
Answer	Response Percent	Response Count	
Options			
Yes	76%	114	
No (If no, go to #49)	24%	36	
Number of respondents answering this 150 question			

48. How often does your agency provide regular, formal records management training to all agency staff? (2 points)		
Answer Options	Response Percent	Response Count
Quarterly or more often	17%	19
Twice a year	11%	13
Once a year	62%	71
Less often than once a year	10%	11
Number of respondents answering this 114 question		

49. Do you use an evaluation system to determine the effectiveness of your formal training program? (2 points)		
Answer	Response Percent	Response Count
Options		
Yes	56%	84
No (If no, go to #51)	44%	66
Number of respondents answering this 150 question		

50. How do you evaluate your records management training program? (Choose one) (Non-scored)		
Answer Options	Response Percent	Response Count
Exams that test content comprehension	18%	15
Completion of evaluation forms	36%	30
Follow-up contact with participants	12%	10
Records management inspections/audits	18%	15
Other (Please specify)	17%	14
Number of respondents answering this		84
question		

Informal records management training is a training activity that does not meet the definition of formal records management training.

51. Does your agency provide informal records management training to its staff? (Non-scored)			
Answer Options	Response Percent	Response Count	
Yes	85%	214	
No (If no, go to #53)	15%	37	
Number of respondents answering this question		251	

## 52. Does your agency use any of the following informal ways to provide records management information to your staff? (Choose all that apply) (Non-scored)

Answer Options	Response Percent	Response Count
Responders could pick mo	re than one option	
Information on website(s)	80%	173
Broadcast e-mails	54%	117
My agency does not use any informal way to provide records management training to staff	2%	5
Other (Please specify)	57%	123
Number of respondents answering this question		215

## 53. Whether informal communication or formal training, what topics are covered in your agency's records management training? (Choose all that apply) (Non-scored)

Answer Options	Response Percent	Response Count	
Responders could pick mor	Responders could pick more than one		
Records management roles and responsibilities	89%	224	
Identifying Federal records and non-records in all media	87%	218	
Maintenance and use of records in all media	77%	195	
Records schedule implementation	77%	193	
E-mail records	81%	204	
Vital records	61%	153	
Records retention	86%	216	
Records disposition for records in all media	78%	197	
Records storage	81%	203	
My agency does not provide records management training to staff	8%	20	
Other	9%	23	
Number of respondents a	nswering this question	251	

(2 points)	nave a way for staff to find	answers to records management questions?
<b>Answer Options</b>	Response Percent	Response Count
Yes	98%	247
No (If no, go to Comments)	2%	4
Number of respondents answering this question		251

55. Please describe the ways that your agency's staff can find answers to their records management questions.

Records Management Training - Records Liaison Officers (RLOs)

Formal records management training is the communication of standardized information that improves the records management knowledge, skills, and/or attitudes of records liaisons. 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

56. Do your agency's records liaisons receive formal records management training? (3 points)		
Answer Options	Response Percent	Response Count
Yes	68%	170
No (If no, go to # 62)	32%	81
Number of respondents answering this question		251

57. What percentage (2 points)	of your agency's records liai	sons receives formal records management training?
Answer Options	Response Percent	Response Count
Less than 5%	2%	3
6-25%	8%	13
26-50%	10%	17
51-80%	14%	23
81-100%	67%	114
Number of respondents answering this question		170

58. Is formal records management training mandatory for all records liaisons? (Non-scored)		
Answer Options	Response Percent	Response Count
Yes	72%	122
No	28%	48
Number of respondents answering this question		170

59. Which of the following ways do you provide formal records management training to your records liaisons? (Choose all that apply) (Non-scored)		
Answer Options	Response Percent	Response Count
Responders could pick mo	re than one option	
Classroom/in-person by agency's records management staff	71%	121
Customized NARA records management training classes	54%	91
Agency-led webinars	15%	26
Self-directed, computer- based training	55%	94
Video-conferencing	19%	33
On-site leader-led workshops	35%	60
Teleconferences	36%	62
One-on-one	64%	109
Other, Please specify	21%	35
Number of respondents answering this question 170		

Regular means that the training occurs more than just once.

60. Do you provide regular, formal records management training to your records liaisons? (2 points )		
Answer Options	Response Percent	Response Count
Yes	81%	137
No (If no, go to # 62)	19%	33
Number of respondents answering this question		170

61. How often does your agency provide formal records management training to your records liaisons? (2 points)		
Answer Options	Response Percent	Response Count
Quarterly or more often	27%	37
Twice a year	20%	27
Once a year	44%	61
Less often than once a year	9%	12
Number of respondents answering this question		137

Informal records management training is a training activity that does not meet the definition of formal records management training.

62. Do your agency's records liaisons receive informal records management training? (2 points)		
Answer Options	Response Percent	Response Count
Yes	83%	208
No (If no, go to # 64)	17%	43
Number of respondents answering this question		251

63. How does your agency provide informal records management training to your records liaisons? (Choose all that apply) (Non-scored)			
Answer Options	Response Percent	Response Count	
Responders could pick m	Responders could pick more than one		
Information on website(s)	79%	165	
Broadcast e-mails	59%	123	
Other, please specify	57%	118	
Number of respondents answering this question		208	

## 64. Whether informal communication or formal training, what topics are covered in your agency's records management training for records liaisons? (Choose all that apply) (Non-scored)

	<b>0</b> (	, ,
Answer Options	Response Percent	Response Count
Responders could pick mor	re than one	
Records management roles and responsibilities	84%	210
Identifying Federal records and non-records in all media	81%	203
Maintenance and use of records in all media	76%	191
Records schedule implementation	78%	195
E-mail records	71%	178
Vital records	59%	148
Records retention	84%	209
Records disposition for records in all media	78%	195
Records storage	77%	192
My agency does not provide records management training to its records liaisons	8%	19
Other, please specify	12%	31
Number of respondents a	nswering this question	250

#### Records Management Training - Senior Officials

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)

65. Does the records management program staff conduct training for senior officials on the importance of appropriately managing records under their immediate control? (2 points)		
Answer Options	Response Percent	Response Count
Yes	63%	158
No (If no, go to Comments)	37%	92
Number of respondents answering this question		250

66. What topics are covered in senior briefings? (Non-scored)					
Answer Options	Response Percent	Response Count			
Responders could pick mor	Responders could pick more than one option				
Identification of Federal Records	93%	143			
Government ownership of Federal Records	82%	127			
Government accountability	82%	127			
Legal requirements	86%	133			
E-mail	83%	128			
Alienation of records	47%	72			
Other, please specify	12%	18			
Number of respondents answering this question		154			

To allow NARA to better analyze results and ensure respondents receive the appropriate credit, please complete the following questions.

- 67. Please provide your name.
- 68. Are you the Records Officer?
  - 1. Yes
  - 2. No
- 69. What is your position title?
- 70. What is the name of your agency/organization?

71. How many full-time employees are on your records management staff? Please include full-time government and contract employees in your total.				
Answered 0 and <1	19.10%	50		
Answered 1 and <2	26.70%	68		
Answered 2-9	37.80%	100		
Answered 10-20	7.20%	20		
More than 20	5.20%	13		
Number of respondents answering this question 251				

72. How many locations does your agency/organization records management program serve?				
	Response Percent	Response Count		
Number who answered	:			
0	1%	3		
<10	54%	135		
11 - 30	21%	52		
31 - 50	4%	11		
51 - 100	7%	17		
101 - 500	8%	21		
501 - 1000	3%	8		
over 1000	2%	4		
Number of respondents answering this question		251		

73. How many full-time employees (FTE) are in your agency/organization?				
Answer Options	Response Percent	Response Count		
10,000 or more FTE	21%	53		
1,000 – 9,999 FTE	34%	84		
100 – 999 FTE	31%	78		
1 – 99 FTE	14%	35		
Number of respondents answering this question		251		

### Please provide your contact information.

Agency, Bureau, or Office:

Address: Address 2: City/Town:

State:

ZIP/Postal Code: E-Mail Address: Phone Number: