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UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

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LOGISTICS AND COMMUNICATIONS
DIVISION

RELEASED

DEC 11 1973

B-146743

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The Honorable Henry P. Smith III
House of Representatives

Dear Mr. Smith:

Your October 15, 1973, letter enclosed correspondence from Mr. J. J. Upson, President, The Upson Company, Lockport, New York, and requested our advice on how to reduce the vast stockpile of records at Federal records centers and, at the same time, make this paper available for recirculation.

The General Accounting Office also has been concerned with the increasing volume of records being stored in these centers. This concern was expressed in our August 13, 1973, report to the Congress entitled "Ways to Improve Records Management Practices in the Federal Government" (a copy is enclosed), which was the report referred to in the Washington Report article. However, the statement in the article that our report indicates the ocean waters between Washington and Cairo would be a good place to bury a lot of the records is the reporter's conclusion, not ours.

The report pointed out that Public Law 90-620 authorizes the National Archives and Records Service of the General Services Administration to provide for the efficient and economical management of records and to develop, promote, and coordinate methods to insure that agency records of continuing value are preserved and that those no longer of value are systematically destroyed. We concluded that the National Archives and Records Service could be more effective in reducing the length of time records are stored at Federal records centers by (1) establishing closer surveillance to insure more complete and up-to-date agency records control schedules, (2) developing a better method of evaluating the validity of the record retention periods specified by the agencies, and (3) instituting better procedures for removing from storage those records eligible for disposal.

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The report recommended that the Archivist of the United States should, with the concurrence and cooperation of the Administrator of General Services:

- Monitor agencies more closely to see that they maintain up-to-date schedules showing retention periods for all their records.
- Develop, on a pilot basis, a method to evaluate records use patterns at centers and to provide agencies with feedback as a basis for establishing more realistic retention periods.
- Revise procedures at centers so that records eligible for destruction are destroyed promptly.

CRZ The General Services Administration was very receptive to the report and advised us of actions underway to implement these recommendations. An action statement submitted by the General Services Administration to the House and Senate Committees on *4500* Government Operations indicates that the National Archives and Records Service has already reduced the retention periods for some Government records. This should result in earlier disposal of the records. A copy of the statement is included as enclosure I.

It is too early to ascertain the effect these actions will have on reducing the amount of records held in the Federal centers. We plan, however, to make a followup review of records management at an appropriate time. You can be assured that we will continue to monitor the General Services Administration's progress in disposing of unneeded records.

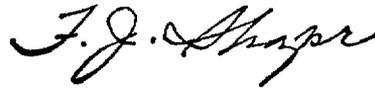
In answer to your question on making the paper from discarded records available for recirculation, General Services Administration officials have advised us that most records are sold for recycling under annual wastepaper contracts which are advertised and are awarded to the highest bidder in each of the General Services Administration's 10 regions. Since the establishment of Federal records centers in 1950, records totaling 10.6 million cubic feet have been sold for recycling, including

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almost 1 million cubic feet in fiscal year 1973. Should Mr. Upson wish to be placed on the bidders mailing list in any of the General Services Administration regional offices, we have enclosed a list of the responsible officials in each region (see enc. II) along with mailing list applications.

We trust that the foregoing information will serve the purpose of your inquiry.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "F. J. Shafer".

F. J. Shafer
Director

Enclosures - 4

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION
WASHINGTON, D.C. 20405

SEP 20 1973

Honorable Elmer B. Staats
Comptroller General of the United States
Washington, D. C. 20548

Dear Mr. Staats:

Thank you again for your well done report to the Congress on "Ways to Improve Records Management Practices in the Federal Government," B-146743.

We have submitted an action statement to the House and Senate Committees on Government Operations as called for by Section 236 of the Legislative Reorganization Act of 1970. We have attached a copy of this statement for your consideration.

We feel confident that our action commitments will do justice to your efforts in our behalf. Meanwhile, we welcome any additional comments or suggestions.

We look forward to your next visit.

Sincerely,



Arthur F. Sampson
Administrator

Enclosure

GENERAL SERVICES ADMINISTRATION (GSA)
NATIONAL ARCHIVES AND RECORDS SERVICE (NARS)

COMMENTS

Comptroller General of the United States Report to the Congress: "Ways to Improve Records Management Practices in the Federal Government," B-146743, of August 13, 1973.

GSA-NARS actions stimulated by or responding to the General Accounting Office (GAO) report, are:

CHAPTER 2, Opportunities to Improve Records Management in the Government:

Recommendations (page 16):

- "Point out in evaluation reports, when possible, how agencies could save money or otherwise benefit by implementing NARS' recommendations."
- "Develop criteria for reporting weaknesses or violations in agency records management programs to the President, the Congress, or OMB."
- "On the basis of these criteria, inform the Congress or OMB of weaknesses and the President and the Congress of violations in an agency's records management program, if an agency fails after a reasonable time to take corrective action."

Actions:

NARS prepared and put to use, a "Preliminary Data Summary" (Attachment I) during a project for the Commission on the Organization of the Government of the District of Columbia, in late 1971. The resultant records or paperwork statistics, as published in the Commission report of August 17, 1972, were both startling and persuasive.

NARS introduced a draft of the Preliminary Data Summary to a conference of Federal records officers in May, 1972, to seek comments and support. Despite limited objections that the workload and cost involved would be excessive, NARS imposed the Summary in a follow-up evaluation of the Department of Justice in August 1972. Again the results were beneficial to the NARS report.

On the strength of the NARS experiences and in view of GAO enthusiasm displayed during their on-site work, the Preliminary Data Summary was installed as an integral part of all records management program evaluations and follow-ups to be conducted after May 1973. The GAO recommendation

then, is both timely and helpful because it supports the NARS position that a Preliminary Data Summary be prepared in all such projects.

At this time, the Summary has become an important step in the evaluations of the Department of the Interior, the National Aeronautics and Space Administration, and the Civil Service Commission. It is also being used in a follow-up evaluation of the Department of Housing and Urban Development.

During the Conference of records officers mentioned earlier, Government agencies were asked to comment upon a NARS "Notice of Proposed Rule Making" involving an amendment to Part 101-11, of Chapter 101, of Title 41, of the Code of Federal Regulations (Attachment II). In effect the proposal calls for a "mutually agreeable action plan" to be submitted to NARS within 60 days following receipt of recommendations, and a follow-up by NARS in 6 months to measure agency fulfillment of commitments.

Implementing the proposed rule will effectively serve the second and third recommendations. Obtaining an action plan from an agency to bring about improvements within a specific time frame, does in fact represent establishment of criteria for reporting weaknesses or violations. "A reasonable time" as specified in the third recommendation, may be the 60 days allowed to file an action plan or the 6 months allotted to bring about planned improvements.

At this point Attachment II is being readied for publication. Meanwhile, NARS has formalized its process for evaluation follow-ups. Under the formal procedure, the Data Summary will be executed, action plans will be prepared within the specified time limit, and additional checks will be made to decide the prospects of reporting unsatisfactory conditions to the President, the Congress, or the OMB. Follow-ups in various stages of completion and which subscribe to latest procedures include, the Departments of Justice and Housing and Urban Development (mentioned earlier), as well as, the Departments of Health, Education, and Welfare, the Navy, and the Railroad Retirement Board.

Needless to say, GSA-NARS has given utmost consideration to the enforcement aspect of records or paperwork management program evaluations as recommended by the GAO report. Evaluations and follow-ups underway or planned will be monitored closely and if the Government agencies involved fail to meet their commitments, appropriate reports will be made to the President, the Congress, or the OMB.

CHAPTER 3, Opportunities to Reduce Records Retention Periods:

Recommendations (page 32):

ENCLOSURE I

- "Monitor agencies more closely to ensure that their record control schedules are complete and up to date. This can be accomplished by keeping data on the status of agency schedules to show how often agencies revise schedules and which agencies have not prepared schedules at all."
- "On a pilot basis, develop a method to evaluate records usage patterns at the centers and to provide agencies with feedback as a basis for establishing more realistic retention periods."
- ↓ "Inform the President, the Congress, or OMB about instances where (1) agencies do not have current, complete record control schedules and (2) agencies and NARS cannot agree on appropriate record retention periods when usage statistics indicate that the retention times established by agencies are excessive."

Action:

In a letter dated August 7, 1973, from the Assistant Archivist for FRC's to all Records Center Directors two studies were initiated to obtain information on the validity of records retention periods. One is a reference usage study modified slightly from the one suggested on page 39 of the GAO report. Its purpose is to obtain data on the validity of records retention periods for all records series in selected record groups. Previously, reference data has been maintained on large series of records only, such as tax returns and Social Security claims; now reference usage of small and medium sized series of records are being sampled.

The first phase of the reference usage study is now underway. Each center has been assigned responsibility for monitoring the reference usage for specifically designated record groups. The total number of record groups being monitored by all Centers is 36. The Centers shall gather data on their assigned record groups until the end of October. At that time, copies of the data will be sent to us for analysis.

Phase two of the study will begin after determining that certain series in the 36 monitored record groups appear to have unrealistic retention periods. It will involve all centers monitoring the reference usage of "suspect" series in each record group. This study will end in January and will provide data based on three months of limited monitoring and three months of detailed tabulations.

In addition, the centers are engaged in a study to provide information by record series on the total volume of unscheduled and permanent records in the system. An analysis of the information obtained from these two studies should be useful in convincing agencies to schedule their records more realistically. In instances involving a difficulty in this regard the referrals to higher levels as suggested by GAO, may be made.

As already reported to the GAO audit team, NARS reorganized its staff and responsibilities for records appraisal in order to concentrate more directly on the assessment and appraisal of both temporary and permanent records. Since the transfer of the appraisal function from the Office of the National Archives to the Office of Federal Records Centers was accomplished in May 1973, 99 disposal schedules, consisting of 1,704 separate record series, have been reviewed. In examining these disposal schedules, appraisers have changed the retention period on 10 series from permanent to a shorter period; divided 12 series into several parts covering permanent and disposable records; changed the retention period on 5 series from indefinite to a specific time period; and returned 4 disposal jobs to appropriate agencies for rewriting due to unacceptable records descriptions.

The NARS records appraisers are also examining drafts of proposed records schedules for acceptable records descriptions and retention periods before they are formally submitted by the agency. At present, they are also preparing, on a reimbursable basis, comprehensive records control schedules for three different agencies.

To assist agencies in proposing more realistic retention periods for their records, NARS is preparing a Records Disposition Handbook. This Handbook will (1) specify and describe the types of records that are archivally permanent, and (2) provide guidance in determining realistic retention periods for other records. It will also provide guidance for agency records officers, in establishing and maintaining an efficient records disposition program consistent with NARS requirements.

NARS is revising Standard Form 115, Request for Authority to Dispose of Records and Standard Form 136, Annual Report of Records Holdings. The revised SF 115 will require a written justification for the retention of records for purely administrative needs after legal and fiscal requirements have been satisfied. It will also be changed to enable an agency to list both their permanent and temporary records for appraisal by NARS, thus eliminating the present need for a separate retention plan. When both temporary and permanent records are listed and submitted to NARS on a single request, it enables the records appraiser to evaluate more effectively the total records of an agency, thereby accelerating the whole appraisal process.

The revised SF 136 will also include information from the agency on the status of their records control schedules and will contain a certification that the schedules are reviewed annually as required by FPMR's.

NARS is also proposing legislation to change from permissive to mandatory the application of General Schedules prepared and issued by GSA.

ENCLOSURE I

CHAPTER 4, Opportunity to Improve Internal Procedures at Federal Records Centers:

Recommendations (pages 36 and 37):

- "Clarify handbook instruction to centers regarding preparation of the GSA Form 439."
- "Notify agencies at least 30 days before their records are eligible for disposal."
- "Destroy records when eligible even though agencies have not responded within the necessary 30 days."

Actions:

NARS is currently revising the Center Operations Handbook to clarify instructions on the preparation of GSA Form 439, as recommended on page 36 of the GAO report.

In a letter to Federal Records Centers on July 16, quarterly mailing is ordered for concurrences in the disposal of records, rather than the former semi-annual mailing. In considering blocks of records of 100 cubic feet or more, concurrence is to be sought as soon as the records are disposable. In the same letter, it was directed that the mailings be accomplished at least thirty days prior to the date they are eligible for disposal.

This autumn we expect to meet with all Center Directors to discuss the full implications of the GAO report. Copies of the report have been sent to Center Directors, expressing the overall NARS desire to avoid keeping any record longer than its prescribed retention period. They have also been reminded to be persistent in destroying records if a response is not received from the agency within thirty days.

GENERAL SERVICES ADMINISTRATIONREGIONAL OFFICIALS TO CONTACTREGARDING WASTEPAPER CONTRACTS

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