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BY THE COMPTROLLER GENERAL

Report To The Congress

OF THE UNITED STATES

Program To Improve Federal Records Management Practices Should Be Funded By Direct Appropriations

The National Archives and Records Service's technical assistance program to help agencies improve records management practices is funded through reimbursements from agencies, not through NARS appropriations. Because NARS must obtain enough money to cover its staff salaries, it places emphasis on obtaining agency agreements to finance technical assistance projects. This limits its ability to establish priorities and use its staff more effectively.

Providing direct appropriations for NARS staff would allow the agency the flexibility it needs to better fulfill its responsibilities for improving records management practices in the Federal Government and provide greater accountability to the Congress. NARS must also develop realistic plans and priorities to achieve this goal.



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COMPTROLLER GENERAL OF THE UNITED STATES
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To the President of the Senate and the
Speaker of the House of Representatives

This report points out problems in the National Archives and Records Service's technical assistance program and its activities for improving Federal records management. The review of the technical assistance program was made in response to a recommendation by the Commission on Federal Paperwork, and the review of the records management activities was made primarily to evaluate the effectiveness of the program.

We are sending copies of this report to the Director, Office of Management and Budget; the Administrator of General Services; and the Archivist of the United States.

A handwritten signature in cursive script that reads "Milton J. Fowler".

ACTING Comptroller General
of the United States

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

PROGRAM TO IMPROVE FEDERAL
RECORDS MANAGEMENT PRACTICES
SHOULD BE FUNDED BY DIRECT
APPROPRIATIONS

D I G E S T

The National Archives and Records Service (NARS) provides technical assistance to help Federal agencies improve their records management practices. Technical assistance services are funded through reimbursements from agencies, rather than from appropriated funds. Because of the reimbursable nature of the program, NARS must be sure it has enough projects underway to cover the salaries of staff members paid from reimbursements.

Forty-eight of the 160 records management staff members are paid through reimbursements, about \$1.6 million in fiscal year 1980. Because of the limited demand for technical assistance, NARS must aggressively market its services to agencies in order to get projects. In some cases, employees paid with appropriated funds were used to generate projects. (See p. 7.) Some of the non-reimbursable work, such as agency inspections, have been left to less experienced analysts. (See p. 9.)

NARS relies on agencies which can pay for its services. In doing so, NARS has been forced to ignore its own objective of helping agencies become self-sufficient in records management practices. In some cases, agencies may have come to rely on NARS services rather than developing an adequate records management program of their own. (See p. 7.)

NARS does not always follow its policy of requiring agency staff to participate in technical assistance studies in order to learn study techniques. (See p. 7.) In

addition, NARS does not always followup and report the results of its technical assistance studies to the Office of Management and Budget (OMB) and the Congress. (See p. 10.)

While NARS has determined that the services for which it is charging agencies are authorized by the Economy Act, its billing methods do not comply with the law. When a transaction is governed solely by the provisions of the Economy Act, funds earned during one fiscal year cannot be collected and deposited to the credit of appropriations which are current during subsequent fiscal years. NARS practice has been to carry over funds from one fiscal year to the next and to collect funds in subsequent fiscal years for services performed in prior years. (See p. 11.)

ADVANTAGES OF APPROPRIATED FUNDING

Providing direct appropriations for NARS technical assistance program would rectify many problems. Direct appropriations would allow NARS the flexibility to better direct its technical assistance program and to develop a balanced approach to its records management program. Furthermore, GAO believes that because agencies pay for NARS studies and because of NARS need to obtain future work to finance its reimbursable staff positions, NARS may be reluctant to report the results of its studies to OMB and the Congress. (See p. 12.)

FEDERAL RECORDS MANAGEMENT ACTIVITIES

NARS has not established realistic goals to determine which records management areas need priority attention. Its staff is spread too thin, working on too many projects, and making little overall progress. (See p. 16.) For example, since the 1977 Commission on Federal Paperwork report the average age of NARS handbooks has increased from about 7 to 9 years. (See p. 17.) In spite of the fact that conducting agency inspections is one of

its most effective tools, NARS has not increased the time devoted to this activity as recommended by the Commission on Federal Paperwork. (See p. 21.)

Many of NARS' scheduled training courses have had to be canceled due to lack of participation by Federal agencies and inadequate preparations for the courses. In fiscal year 1978, 21 of 40 courses were canceled; in fiscal year 1979, 18 of 41 courses were canceled. The number of courses offered, however, was increased from 15 in 1975 to 24 in 1979. (See p. 24.)

GAO found no policies for NARS use of consultants. The reports resulting from several contracts were not used by NARS. (See p. 20.) Furthermore, NARS should make greater efforts to encourage other agencies to conduct records management research studies. (See p. 23.)

RECOMMENDATIONS

The Administrator of General Services should direct the Archivist of the United States to:

- Request direct appropriations for the reimbursable technical assistance positions.
- Report the results of technical assistance studies to OMB and the Congress, including both needed improvements and agency actions.
- Direct that the policy on agency participation in studies be followed.
- Revise billing and accounting practices for reimbursable technical assistance work so that payments are deposited in the proper appropriation accounts in compliance with 31 U.S.C. 701(c).

When appropriated funds are received for presently reimbursable staff, the Administrator of General Services should direct

the Archivist of the United States to develop policies, plans, and priorities for using NARS staff for technical assistance projects or other program activities. (See p. 13.)

To improve records management activities, the Administrator of General Services should direct the Archivist of the United States to:

- Develop plans and establish priorities for using NARS staff resources to better address its records management responsibilities.
- Accelerate development of standards, guidelines, and handbooks.
- Before awarding any future consulting contracts, develop policies and procedures to ensure that the contracts provide services that contribute to NARS records management programs.
- Encourage agencies to provide more resources for records management studies and, if necessary, assert the Federal Records Act authority to do so.
- Monitor training course attendance to determine agency participation and ensure that preparations are made to have instructors and materials available for scheduled courses.
- Send copies of inspection reports to OMB and appropriate congressional committees. (See p. 26.)

AGENCY COMMENTS

The General Services Administration and NARS basically agreed with GAO's recommendations.

NARS told GAO that direct funding, rather than reimbursable funding, of the staff resources now allocated to technical assistance would

permit needed improvements in the effectiveness of the records and information management program. A request for direct appropriations is included in GSA's fiscal year 1982 budget justification, according to NARS officials. (See pp. 14 and 27.)

MATTERS FOR CONSIDERATION BY THE CONGRESS

Funding NARS technical assistance program through direct appropriations would provide greater visibility and accountability to the Congress and would allow NARS to correct many of the problems GAO identified. Furthermore, NARS would be able to set priorities for using its limited resources, thereby maximizing its effectiveness in improving Federal records management practices. (See p. 15.)

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ABBREVIATIONS

GAO	General Accounting Office
GPO	Government Printing Office
GSA	General Services Administration
NARS	National Archives and Records Service
OMB	Office of Management and Budget

CHAPTER 1

INTRODUCTION

The National Archives and Records Service (NARS) is responsible for promoting the effective management and appropriate use of paperwork in the Government through application of proper records management principles and techniques. NARS exercises this responsibility by developing standards and guidelines, providing technical assistance to agencies in the design and implementation of records management systems, training agency personnel in records management through conferences and symposiums, and evaluating agency records management programs for compliance with standards and for operating effectiveness. NARS Office of Records and Information Management 1/ is primarily responsible for these activities. The Office has a budget of about \$5 million and a staff of 160. The Office of Federal Records Centers is responsible for the filing and records disposition aspects of NARS records management program.

In its July 29, 1977, report entitled "Records Management in Federal Agencies," the Commission on Federal Paperwork recommended that we look at the NARS technical assistance program in light of current NARS priorities and efforts to reorient its program. The objectives of the technical assistance program are to improve Government paperwork practices and procedures and to save the Government unnecessary expense and effort in managing its paperwork. Technical assistance studies cover all aspects of records management, including files, reports, forms, directives, copies, micrographics, etc.

The Commission characterized NARS technical assistance program as follows:

"On the one hand it can be argued that NARS should
* * * provide a central service to those agencies
that do not themselves have the resources to establish,
review, improve and evaluate a new or revised records
management program or some important element of the
overall program * * * Understandably, some

1/Prior to May 8, 1979, this Office was named the Office of Records Management. Its basic functions and responsibilities remained the same after the change although the Office was reorganized on May 21, 1979.

agency must serve this function, and NARS responded early and aggressively to this need.

On the other hand, the whole purpose of technical assistance * * * is to help the respondent help him or herself, not to do the job for the person or organization assisted. If the technical assistance is successful, then it should be a matter of time, shorter or longer, before the recipient of the assistance is able to do the job as well or better without outside help."

Technical assistance is provided to agencies on a reimbursable basis. Forty-eight of the 160 positions in the Office of Records and Information Management in fiscal year 1979 were funded from agency reimbursements for technical assistance amounting to about \$1.6 million.

The Commission on Federal Paperwork estimates the direct cost of Federal paperwork at \$43 billion a year. In 1978 the Archives and Records Task Force of the President's Administrative Services Reorganization Project concluded that:

"Within the Government, the reservoir of potential savings, has been tapped only to a limited extent. While authorities are generally adequate, exploitation of obvious opportunities has lagged or faltered. The fact that there have been significant advances in cutting costs and improving systems in certain selected areas of the paperwork spectrum does not remove the onus of neglect for an overall attack on the problem. Much can be done to command agencies' attention and ensure participation in the systematic application of records and information management principles and techniques. The final actions rest with the individual agencies, which must be held accountable for results."

The task force further commented that NARS has the responsibility and the authority to provide program direction and spur agency compliance.

SCOPE OF REVIEW

We reviewed NARS reimbursable technical assistance program to assess its impact on Federal records management practices and on other elements of NARS records management program and to identify opportunities for improving the program.

We made our review from January 1979 to February 1980 at NARS headquarters in Washington, D.C., and NARS regional offices in Fort Worth, Texas; San Francisco, California; and Washington, D.C. We reviewed NARS legislative authority, program activities, budgets, technical assistance contracts, and technical assistance reports. We interviewed NARS officials and analysts in the offices we visited.

We visited selected Federal agencies which received NARS technical assistance services and reviewed their implementation of changes recommended by NARS. We discussed NARS records management program and activities with agency officials. We also contacted officials of records management associations. We discussed financial aspects of NARS reimbursements with officials of the Office of Management and Budget (OMB).

CHAPTER 2

REIMBURSABLE FUNDING RESTRICTS NARS ABILITY

TO BETTER MANAGE ITS RECORDS PROGRAM

Under the technical assistance program, NARS, when requested, provides direct records management assistance to Federal agencies. The technical assistance is provided to agencies on a reimbursable basis. Because of the reimbursable nature of the program and the number of staff that must be paid with the reimbursable funds, NARS is required to place emphasis on obtaining projects in order to cover staff salaries. This has resulted in NARS soliciting agencies and using staff funded by appropriations to generate projects, limiting its ability to effectively direct its resources and deviating from its program policies. In addition, NARS billing practices for technical assistance services do not comply with the law.

INCREASED EMPHASIS ON TECHNICAL ASSISTANCE AND REDUCED DEMAND REQUIRES MARKETING OF SERVICES

In 1966 the Archivist of the United States testified that some 460 agency records management surveys had been completed over the past 15 years. Since that time, NARS emphasis on technical assistance has increased. However, agencies' reduced demand for these services has required NARS to market its services in order to generate reimbursable projects.

Technical assistance studies appear to have started just after NARS records management role was assigned by the Federal Records Act of 1950. In 1964, when the number of requests for technical assistance services outgrew its staff capacity, NARS began charging agencies a fee for its services. Before 1964, NARS provided the services without charge. NARS believed much of the increased demand was for assistance which was unique to an individual agency and, therefore, should be paid by that agency.

From 1964 to 1980, the reimbursable program has grown from \$32,000 to about \$1.6 million, with salaries of 48 of the 160 Office of Records and Information Management employees dependent on reimbursable funding. Through reimbursements, NARS increased the number of staff who could

perform technical assistance. Table 1 shows the growth of NARS Office of Records and Information Management and reimbursable element of this office.

Before 1971 all NARS reimbursable technical assistance was performed by headquarters staff. However, in fiscal year 1972, reimbursable goals of \$15,000 were assigned to each of the 10 regional records management divisions. At the time, the Assistant Archivist noted that the 1972 goals required less than half a staff-year of effort by each field office. In fiscal year 1974, no specific reimbursable goal was set for field offices. Rather, a combined field-headquarters goal was set.

In fiscal year 1977, NARS' reimbursable program was substantially realigned. In order to free headquarters staff for appropriated program activities, such as developing handbooks and conducting inspections, more than half of the total reimbursable financing was imposed on NARS field offices. For fiscal years 1977 and 1978, the field offices expected to earn about 60 percent of the funds to finance the 48 reimbursable positions. For fiscal year 1979, the figure increased to over 70 percent, or about \$1 million. The reimbursable earnings goal for each field office is generally related to the staffing levels of the office. Thus, each field office must dedicate 60 to 70 percent of its available analyst time to reimbursable work.

Our review of NARS field office activities showed that considerable effort is involved in generating reimbursable projects. NARS refers to its selling efforts as marketing. NARS marketing has the features of commercial marketing, such as phone calls, personal visits, and referral. The aim of the marketing efforts is to have an agency formally request a short reconnaissance study. The reconnaissance study involves a brief onsite examination of the agency by NARS staff. Its purpose is to identify paperwork problems and to price out a proposal for a reimbursable study. The reconnaissance study may concentrate on one records management program element, or it may concentrate on many elements. The latter usually results in a list of improvement projects from which an agency can select those it desires or can afford. An agency may also make recommended improvements without NARS aid.

An example of NARS approach to generating and selling technical assistance is its work at the Federal Highway Administration in Fort Worth, Texas. Through repeated visits

Table 1
Resources and Staffing for NARS
Office of Records and Information Management

Fiscal year	Appropriations		Reimbursements		Total	
	No. of staff	Amount	No. of staff	Amount	No. of staff	Amount
1963	69	\$ 930,211	-	\$ -	69	\$ 930,211
1964	73	992,819	1	32,000	74	1,024,819
1965	73	1,045,115	3	48,000	76	1,093,115
1966	75	1,108,384	20	153,326	95	1,261,710
1967	82	1,189,887	27	332,134	109	1,522,021
1968	76	1,213,843	34	485,011	110	1,698,854
1969	78	1,314,547	34	526,000	112	1,840,547
1970	80	1,536,886	34	702,347	114	2,239,233
1971	76	1,625,000	36	712,900	112	2,337,900
1972	84	1,840,000	35	759,915	119	2,599,915
1973	85	1,748,455	39	888,400	124	2,636,855
1974	105	2,064,600	41	1,094,500	146	3,159,100
1975	112	2,500,000	45	1,046,200	157	3,546,200
1976	105	2,505,000	<u>a/48</u>	1,285,100	153	3,790,100
1977	109	2,930,000	48	1,378,400	157	4,308,400
1978	126	3,050,000	48	1,562,400	174	4,612,400
1979	112	3,206,000	48	1,560,000	160	4,766,000
1980	<u>b/110</u>	3,374,000	48	1,560,000	158	4,934,000

a/The fiscal year 1976 total, including transition quarter, was \$1,617,200.

b/GSA is requiring NARS to freeze 1 percent of this amount. The 1 percent will be authorized or transferred (withdrawn) later in fiscal year 1980.

NARS convinced Highway Administration officials that the agency could benefit from a NARS study. NARS identified six areas--correspondence, forms, directives, mail, records disposition, and word processing--where improvements were needed and proposed a \$19,890 study to accomplish the work. The Highway Administration contracted with NARS to study only one of the areas--word processing--at a cost of \$12,160. Word processing was selected because the Highway Administration was considering buying additional word processing equipment and wanted an independent assessment of the idea. The Highway Administration cited a lack of funds in rejecting NARS proposal for studying the other five areas.

REIMBURSABLE STUDIES REQUIRE USE OF APPROPRIATED RESOURCES

NARS need to market its reimbursable services indicates that NARS field office staff resources committed to its reimbursable program exceeds agencies' demand for its services. This imbalance has caused NARS to devote appropriated resources to its reimbursable program. For example, in fiscal year 1978 the Fort Worth office used 56 percent of the 5 years of available analyst time on its reimbursable studies. Its marketing and reconnaissance work, aimed at generating reimbursable work, consumed appropriated resources of 1.1 analyst years, or 22 percent of the available analyst time.

REIMBURSABLE FUNDING LIMITS NARS ABILITY TO IMPROVE FEDERAL RECORDS MANAGEMENT PROGRAMS

The Commission on Federal Paperwork report stated that NARS technical assistance program is a way to help agencies become self-sufficient in their records management practices. This, in fact, is the role of NARS as established by the Federal Records Act. The act also requires that agencies have an active, continuing records management program. NARS policies on its technical assistance are designed to achieve the act's objectives. Reliance on reimbursements to operate this program limits NARS ability to achieve its technical assistance and other program objectives.

Policies on agency self-sufficiency not achieved through technical assistance

Although the training of agency personnel through their participation in technical assistance studies is a NARS requirement, this does not always occur. As a result, some

agencies may have become reliant on NARS services in lieu of developing their own records management programs.

NARS Office of Records and Information Management policy is to require agency participation in its studies. The purpose of this requirement is to train agency staff in records management study techniques. NARS headquarters officials said that this requirement is generally written into agencies' contracts. However, our discussions with officials at agencies indicate that some agencies do not require their staff to participate in the NARS studies and that some of the actual staff participation is not meaningful. For example, a U.S. Geological Survey official advised us that staff participation involved fact gathering, and was not viewed as training. A Bureau of Indian Affairs official did not view training of agency staff as the purpose of NARS assistance. An official of one Department of Labor office said participation by his staff is required by the NARS contract, but is not being carried out. By comparison, another Department of Labor official said he views the participation as a valuable training tool and requires the staff to participate in a management analyst capacity.

Over the years, some agencies may have come to rely on NARS while the agency records management problems persist. Since 1970, NARS has performed 17 technical assistance projects for the Equal Employment Opportunity Commission. NARS central office performed eight of the projects and four of NARS regions performed the other nine projects. Six of the 17 projects were case handling projects with a great degree of similarity. Seven of the others were general records management reconnaissance projects.

Agency records management officers we interviewed said NARS low-cost technical assistance may, in fact, hinder the development of good agency records management programs. The availability of NARS service gives an agency the option of addressing its records problems without making a commitment to the development of its own records management program. Records management officers we contacted were often unaware of ongoing NARS studies in their agencies. They believe NARS competes with them and may hinder their agencies' efforts to develop records management programs. For example, over the past 3 years, the Department of Labor's Employment and Training Administration contracted for 13 NARS studies at a cost of about \$280,000. During that same time the Agency's records management staff decreased.

NARS officials advised us that reimbursable goals have forced them to depend on larger agencies which are better able to pay for reimbursable studies. In fiscal year 1978, NARS conducted 84 technical assistance studies for agencies. We compared the agencies receiving assistance with the January 1979 monthly listing by the U.S. Office of Personnel Management showing the Federal civilian workforce at 132 agencies. The comparison showed that 72 of the 84 assistance studies, or 86 percent, were performed for the 25 agencies employing the largest civilian workforce. These agencies each had over 10,000 civilian employees.

Reimbursable work affects NARS
ability to use its staff in other
important areas

The Assistant Archivist, in a 1978 memorandum, informed the Archivist that the level of reimbursable work being performed in the central office "is adversely affecting the performance of our other functions." He noted that the central office staff was devoting 30 percent of its analyst time to reimbursable studies. Marketing costs caused an additional drain on resources. The memorandum also pointed out the reimbursable work was a high visibility area requiring the use of more experienced analysts. Therefore, some of the non-reimbursable work, clearly the most important part of NARS mission, is left to less qualified analysts. To overcome this weakness, the Assistant Archivist proposed that 15 central office positions be converted from reimbursable funding to appropriated funding. The Archivist rejected the shift.

We examined a NARS analysis of proposals made by a GSA regional administrator to improve NARS program. The regional administrator suggested a decrease in emphasis on reimbursable work in favor of studies which offer greater opportunities for cost reduction. The analysis noted that having to meet reimbursable goals can result in more emphasis being placed on the goal itself than on selecting studies that will achieve the greatest benefit. The NARS analysis acknowledged the fact that reimbursable contracts may be signed merely to get the reimbursable income needed to support the staff although headquarters discouraged this and emphasized placing priority on studies which will result in savings to agencies.

NEED TO MORE FULLY REPORT
STUDY RESULTS

NARS does not always followup and report on the results of its technical assistance studies. The Federal Records Management Act Amendments of 1976 requires the Administrator of GSA to report to OMB and the Congress on the results of recommendations made by him from studies or inspections. More complete reporting on continuing records management problems in agencies could increase NARS effectiveness by giving greater visibility to needed improvements.

In its December 1977 design analysis report to the Equal Employment Opportunity Commission, NARS concluded that Commission weaknesses were "mainly attributable to deficiencies in the EEOC's management and organizational structure and the attitude of its employees." In the report, NARS asked the question "Why should the NARS recommendations succeed when the same recommendations in the past failed?" The NARS report stated that in spite of all the prior studies the Commission's systems are redundant and inefficient, lack cost effectiveness, and fail to provide decisionmakers with necessary management information.

There is no mention of the Equal Employment Opportunity Commission's problems in either the fiscal years 1977 or 1978 NARS report to the Congress. In fact, neither report comments on any deficiencies in agency responsiveness to technical assistance recommendations. NARS reports indicate that substantial savings can be achieved when agencies implement NARS recommendations.

In its 1975 annual report to the Archivist, the Office of Records and Information Management reported savings of \$10.2 million resulting from its technical assistance efforts. This was a 10 to 1 ratio of savings to costs. In preparing its 1977 annual report to OMB and the Congress, NARS contacted agencies which received technical assistance to determine what recommendations were implemented and what savings resulted from the implementation of NARS recommendations. The agencies estimated a \$2 million savings on recommendations that were quantifiable. In 1978 NARS did not followup on its technical assistance study recommendations.

We do not believe NARS responsibility ends when its technical assistance report is sent to an agency. However, the fact that NARS relies on reimbursements to finance its

staff places it in a difficult position. If NARS tells OMB or the Congress about agency inactions on its recommendations, agencies may be reluctant to request NARS assistance in making needed improvements. But, by not following up on its recommendations and reporting agency problems and any lack of corrective action, as well as improvements resulting from its recommendations, NARS is not fulfilling its responsibilities under the Federal Records Act. Further, and more importantly, agencies may not achieve benefits they could achieve if they implemented NARS recommendations.

NARS BILLING PRACTICES FOR TECHNICAL ASSISTANCE SERVICES DO NOT COMPLY WITH LAW

Most of NARS technical assistance is provided to agencies for a fee as authorized by section 601 of the Economy Act of 1932, which provides that:

"any executive department or independent establishment of the Government, or any bureau or office thereof * * * may place orders with any other such department, establishment, bureau or office for materials, supplies, equipment, work or services of any kind that such requisitioned Federal agency may be in a position to supply or equipped to render, and shall pay promptly by check to such Federal agency as may be requisitioned upon its written request, either in advance or upon the furnishing or performance thereof * * *." (Underscoring added.)

However, NARS methods of billing for these services do not comply with requirements of law.

Billing on each technical assistance project may be done either as the project proceeds or upon completion of the project. NARS bills according to the wishes of the client agency; but in the majority of cases, billing is done after completion of the project. This billing practice ensures NARS that sufficient funds are available early in the fiscal year to pay the salaries of employees financed through reimbursements. This results in projects completed in one fiscal year, as well as work in process at the end of that year often not being billed until the subsequent fiscal year. In fact, it is the stated intent of the Assistant Archivist for Records and Information Management to have amounts due from agencies that will cover 50 percent of the subsequent fiscal year's reimbursable budget. At the end of fiscal year 1978,

the amounts due from agencies totaled \$410,000, of which \$77,000 was for projects fully completed in fiscal year 1978.

We have held that, with respect to transactions governed solely by the provisions of the Economy Act, reimbursements for work, service, or materials must be credited to the fiscal year appropriations which earned them irrespective of when the reimbursements are collected. If the appropriation which earned the reimbursement remains available at the time of collection, the collections can be deposited to the credit of the appropriation and remain available for obligation. But if the appropriation which earned the reimbursement has expired for obligational purposes at the time of collection, the funds can only be credited to the appropriate successor accounts under 31 U.S.C. 701(c). Thus, if the appropriation which earned the reimbursement by NARS has expired for obligational purposes, then the amounts due or collected would not be available for current obligation.

When performing reimbursable work under the Economy Act, NARS should (1) request payment in advance with adjustments based on actual costs after completion of the work or service, or (2) promptly bill the requesting agency upon completion of the work, or (3) periodically bill the agency as portions of the work is completed.

However, if NARS records management program functioned on an appropriated rather than a reimbursable basis, this would eliminate NARS difficulties in meeting its payroll.

CONCLUSIONS

Faced with increasing demands for its technical assistance resources, NARS began to charge agencies for these services. Financing the program under the Economy Act of 1932 provided the funds needed to hire additional staff and expanded the technical assistance provided to agencies. However, in order to devote more attention and resources to other elements of its records management program, NARS headquarters shifted much of the responsibility for technical assistance to its field offices. Field office staffing and related reimbursable goals now exceed the demand for NARS technical assistance services. This places a drain on field office resources because the offices must expend the necessary staff resources to market their technical assistance services.

NARS need to fund its salaries through reimbursements has resulted in reliance on agencies which are able to pay.

In some cases, it appears that agencies have come to rely on NARS services rather than developing an adequate records management program, as required by the Federal Records Act. NARS does not always follow its policy of requiring agency staff participation in technical assistance studies in order to learn study techniques.

NARS should followup and more fully report the results of its studies, including needed agency improvements, to OMB and to the Congress. We believe the fact that agencies pay for NARS studies and that NARS must obtain future work to finance its reimbursable staff positions inhibits its independence in reporting on its studies.

We believe that direct appropriations would eliminate many problems in NARS program and allow NARS the flexibility to better direct its technical assistance program and to develop a balanced approach to its records management program.

RECOMMENDATIONS

We recommend that the Administrator of General Services direct the Archivist of the United States to:

- Request direct appropriations for the reimbursable technical assistance positions.
- Report the results of technical assistance studies to OMB and the Congress, including both needed improvements and agency actions.
- Direct that the policy on agency participation in studies be followed.
- Revise the billing and accounting practices for reimbursable technical assistance work so that payments are deposited in the proper appropriation accounts in compliance with 31 U.S.C. 701(c).

When appropriated funds are received for presently reimbursable staff, the Administrator of General Services should direct the Archivist of the United States to develop policies, plans, and priorities for using NARS staff for technical assistance projects or other program activities.

AGENCY COMMENTS AND
OUR EVALUATION

GSA and NARS basically agreed with our recommendations. NARS told us that direct funding, rather than reimbursable funding, of the staff resources now allocated to technical assistance would permit needed improvements in the effectiveness of the records and information management program. NARS officials advised us that a request to convert its reimbursable assistance staff to appropriated funding is included in GSA's fiscal year 1982 budget justification.

NARS advised us that it reemphasized its policy of requiring agency participation in studies in a conference with its regional office directors in February 1980. NARS does not believe its technical assistance competes with agency records management organizations for resources. NARS states that its program is designed to aid, not hinder, agency efforts to develop its own records management program. Rightly or wrongly, some agency records management officials perceive NARS efforts as competition. They believe that NARS services allow the agency an alternative to solving records problems without making a long-term commitment to developing a fully trained and staffed records management organization. Admittedly, such views can be parochial, but NARS own studies show that few agencies have an adequately staffed records management program.

NARS told us that its reconnaissance studies are technical assistance in their own right and result in reports that call agencies' attention to opportunities to reduce costs or increase effectiveness. Further, NARS commented that some reconnaissance reports present solutions to problems or outline plans for analyzing problems. NARS view is that its marketing efforts are designed to sell good records management, not just its reimbursable services.

While this is the perspective of NARS headquarters, we found that reimbursable income goals for NARS field offices result in a completely different perspective of the program. NARS field officials' view is that achieving their reimbursable income goals is the essence of NARS headquarters policy. With only dollar goals as guidance, they believe they can work at any willing agency on any aspect of records management as long as they produce the required income. Therefore, the primary aim of most field office reconnaissance studies is selling reimbursable services.

NARS stated that it is reluctant to report agency problems or deficiencies to OMB and the Congress not because its studies are reimbursable but because agencies may be hesitant to request assistance, even free assistance, if they have to answer to OMB and the Congress when they do not implement resulting recommendations. However, various agency officials told us that providing added visibility to the benefits of needed improvements is often necessary to obtain adequate funding to implement the recommendations. Furthermore, we believe the law is clear that the Congress intended for NARS to report on both records management improvements made by agencies as well as improvements needed. Regardless of NARS concerns on this matter, NARS officials told us that NARS will report the results of all technical assistance studies.

MATTERS FOR CONSIDERATION BY THE CONGRESS

NARS could eliminate many of the deficiencies in the technical assistance program if the program was funded through direct appropriations. In addition, greater visibility and accountability to the Congress can be achieved by direct appropriations for staffing NARS technical assistance program. This would enable NARS to set priorities for using its limited resources, thereby maximizing the potential impact.

CHAPTER 3

INADEQUATE PLANNING AND ADMINISTRATION

OF NARS FEDERAL RECORDS MANAGEMENT ACTIVITIES

NARS Office of Records and Information Management is not establishing realistic goals in determining which records management areas need priority attention. As a result, NARS has not been successful in upgrading its records management activities despite commitments made to the Commission on Federal Paperwork.

NARS has made little progress in preparing and issuing handbooks to assist agencies. In addition, NARS has not developed policies and procedures to assure that when used, consulting contracts complement its records management program. NARS should increase the time expended on agency inspections, which is one of the best ways NARS can improve agency records management practices.

NARS has not fully exercised its authority to get other agencies to perform research studies in the records management area. Also, numerous NARS training courses have been canceled due to lack of participation by Federal agencies and administrative problems.

LIMITED RESOURCES REQUIRE ESTABLISHING PRIORITIES

With limited staff to fulfill its vital mission, we believe NARS Office of Records and Information Management needs to determine which of its records management responsibilities warrants priority attention. We analyzed the Office's headquarters planning and staffing to evaluate its efforts to set realistic goals.

During fiscal year 1979, the Office had 110 headquarters staff. Of the 110 headquarters staff, 68, or about 62 percent, served in a management analyst capacity. The remaining 42 staff members consisted of 14 supervisory and 28 clerical or administrative positions.

With its 68 analysts, the Office's 1980 plans provide for developing 23 standards, regulations, and guidelines; preparing 9 handbooks; and developing 14 training courses. In addition, based on NARS past experience, we would expect

that NARS will conduct 4 inspections and about 40 technical assistance studies. Therefore, for the 68 analysts, the total number of projects is 90. These figures do not take into consideration staff vacancies and leave nor do they include technical assistance reconnaissance studies and symposiums. Based on past performance, as discussed in subsequent sections, this seems like an untenable workload.

HANDBOOKS--MANY PROMISES
BUT LITTLE PROGRESS

In 1977 the Commission on Federal Paperwork criticized NARS because up-to-date handbooks were not issued. The Commission reported that the average age of NARS handbooks was 6.8 years in 1976. NARS officials advised the Commission that they were making a concerted effort to reduce the average age below 3 years by fiscal year 1978. This has not been done. As of February 1980, the average age of NARS handbooks had increased to over 8.6 years. A recent status report on the handbooks indicates that most are presently in various stages of review. (See table 2.)

In one critical area, word processing, NARS recognized the need for standards and guidance in 1975 to assure that agencies properly use this technology. Over 4 years ago, NARS drafted a word processing handbook, but this handbook was never issued. In mid-1975 the Army issued a word processing handbook. A year earlier, the Army had issued regulations on how to conduct word processing feasibility studies, perform cost-effectiveness analyses, and make lease versus purchase decisions. However, Army officials found that NARS was reluctant to draw upon the expertise they had developed.

Since 1975, nine other agencies have developed and issued their own word processing handbooks. GSA was among these agencies. Had NARS developed a word processing handbook for Federal agencies, this duplication of effort might have been avoided.

The responsibility for promulgating handbooks is primarily NARS Office of Records and Information Management. Officials of that Office acknowledge the need for timely handbooks. However, our analysis of resources committed to handbooks by the Office showed that only 8 staff-years or 6 percent of its available central office analyst staff time for fiscal year 1979 was spent developing standards, guidelines, and handbooks.

TABLE 2
Progress of NARS Handbooks
January 1979 Through February 1980

<u>Handbook title</u>	<u>Date issued</u>	<u>Age in 1980 (years)</u>	<u>January 1979 status</u>	<u>October 1979 status</u>	<u>February 1980 status</u>
<u>Correspondence</u>					
Correspondence Management	1973	7	(a)	Planned for 1983	Planned for 1983
Form and Guide Letters	1973	7	(a)	Planned for 1984	Planned for 1984
Plain Letters	1973	7	(a)	(a)	(a)
U.S. Government Correspondence Manual	1977	3	(a)	Planned for 1982	Planned for 1982
<u>Mail</u>					
Executive Secretariat (note b)	New	-	First draft March 1979	Third draft under review	Work postponed due to lack of resources
Managing the Mail (note b)	1971	9	First draft June 1979	All but one chapter drafted	Complete draft in fiscal year 1980
<u>Forms</u>					
Forms Analysis and Design (note b)	1960	20	First draft March 1979	In final editing due for publication December 1979	In editing
Forms Management (note b)	1960	11	First draft June 1979	First draft outline due June 1980	Plan to complete first draft in 1981
Standard and Optional Forms Facsimile Handbook	1976	(c)	(c)	(c)	(c)
Specialty Forms	1974	6	(a)	Planned for 1980	Will be included in forms for automation fiscal year 1981
Forms for Automation	New	-	-	-	Planned for 1981
<u>Reports</u>					
Reports Management (note b)	New	-	First draft September 1979	First draft outline due June 1980	Draft in fiscal year 1980
<u>Directives</u>					
Communicating Policy and Procedures	1967	13	First draft June 1979	First draft March 1980	Completed draft in fiscal year 1980
Writing Effective Directives	New	-	First draft September 1979	Content outline under review	Completed draft in fiscal year 1980
Managing by Directives	New	-	First draft September 1979	Canceled	-
<u>Copy Management</u>					
Copy Management (note b)	New	-	First draft March 1979	d/First draft March 1980	Completed draft in fiscal year 1980
<u>Information Retrieval</u>					
Micrographics Management	New	-	First draft March 1979	Draft approved by division	In editing--will be sent to agencies for comment late in fiscal year 1980
Computer Output Microfilm	1975	5	(a)	(a)	(a)
Information Retrieval	1972	8	(a)	(a)	(a)
Information Retrieval System	1970	10	(a)	(a)	(a)
Microfilming Records	1974	6	(a)	(a)	(a)
Microform Retrieval Equipment Guide	1974	6	(a)	(a)	(a)

<u>Handbook title</u>	<u>Date issued</u>	<u>Age in 1980 (years)</u>	<u>January 1979 status</u>	<u>October 1979 status</u>	<u>February 1980 status</u>
<u>Automated Information</u>					
Conducting Work Processing Feasibility Studies (notes b and e)	New	-	First draft March 1979	Sent to GPO for printing October 1979	Advance edition sent to agencies for comment in November 1979
Word Processing Systems Analysis (notes b and e)	New	-	First draft June 1979	-	-
Implementing Word Processing Systems	New	-	First draft June 1979	First draft March 1980	First draft Summer 1980
Source Data Automation	New	-	(a)	Planned for 1980	Lack of resources prevents completion
<u>Current Files</u>					
File Stations (note f)	1967	13	In editing	Design February 1980	In editing
Files Operations (note f)	1964	16	In editing	To GPO January 1980	In final design
Subject Filing (note f)	1966	14	In editing	To GPO January 1980	In final design
<u>Noncurrent Files</u>					
Disposition of Federal Records (note f)	1978	2	(a)	(a)	(a)
Federal Archives and Records Centers (note f)	1979	1	(a)	(a)	(a)
<u>Miscellaneous</u>					
Agency Self-Inspection Guidelines	New	-	(g)	(g)	(g)

a/Handbook not planned for revision at this time.

b/In April 1977, NARS estimated publication of these handbooks by the end of fiscal year 1978.

c/Supplements issued as needed.

d/The present "first draft" will actually be a third draft in the latest NARS attempts to prepare a copy management handbook. The first two drafts were rejected.

e/The two handbook projects were combined into a single handbook entitled: Word Processing Manual-Methods and Procedures for Conducting Word Processing Feasibility Studies.

f/This handbook is the responsibility of the Office of Federal Records Centers.

g/Each NARS branch is developing self-inspection guidelines in its area of technical expertise. The guidelines are supposed to be published when they are completed and eventually consolidated into a handbook. The guidelines for micrographics were approved by the Assistant Archivist and should be published in fiscal year 1980. The micrographics self-inspection guidelines will serve as a model for others.

POLICIES ON USING CONSULTING
CONTRACTS ARE NEEDED

A 1975 report to the Archivist of the United States commented that

"a policy on the use of contractors to perform work for the Office of Records Management has not been developed, consequently they may have been used to perform work that could have been better conducted in-house, or they may have been assigned to tasks that are contrary to GSA regulations."

The report concluded that the use of contractors be spelled out as a general policy and used to complement and supplement the efforts made to achieve defined objectives. However, no policies have been developed for the use of consultants.

During the last 45 days of fiscal year 1977, NARS Office of Records and Information Management entered into 11 consultant contracts for records management related projects totaling about \$300,000. A \$7,500 contract was entered into in September 1977 for an analysis of Government directives management. The contract was to provide the needed information for up-to-date standards and guidelines in the directives area. The consultant's final report was submitted to NARS on January 3, 1978. However, it has been 2 years since the completion of the contract and NARS revised directives management regulations is in its sixth draft, with no estimated completion date; the handbook, "Writing Effective Directives," is only in the outline stage; the planned handbook, "Managing by Directives," has been canceled; and the directives management standards project is only in the planning stage.

Another contract agreement for the development of a reports management workshop began on September 26, 1977. The fixed-price contract was for \$40,823. A final course package was to be submitted at the end of 25 weeks (by April 1, 1978.) This project was still ongoing in February 1980. The project has been marked by long delays on the part of the consultant, a format change by NARS, subcontracting, and cash flow problems of the subcontractor resulting in NARS amending the contract so that payment could be made for work to date. NARS officials noted that the office did not know what to do to get the contractor to produce the expected results. In February 1980, 2 of the 11 contracts made in 1977 were still open although all should have been completed by February 1979.

The current status of NARS program in several areas indicates that over the years, many contracts may have been of little or no value. For instance, in 1972 a consultant prepared a copy management handbook. In 1976, however, another consultant reported that the data in the draft handbook was outdated and geared to private industry rather than to Government. NARS copy management handbook is currently in its third draft.

The 1975 report to the Archivist cited numerous consultant contracts which were made in fiscal years 1973, 1974, and 1975. However, NARS made little use of the data provided under several of these contracts and has yet to issue handbooks or regulations in several areas covered by the contracts. One contract was for developing a word processing handbook. However, the handbook developed was not issued even though NARS recognized the need for word processing guidance. Another word processing handbook prepared by NARS employees was sent to the Government Printing Office in October 1979. Another of the early contracts called for a revised forms design handbook; this handbook was not issued. A draft forms analysis and design handbook prepared by NARS employees was in editing in February 1980.

NARS has not yet developed policies and procedures for consulting contracts. Although no consulting contracts for records management were entered into in fiscal years 1978 and 1979, we believe that before awarding any future consulting contracts, NARS should develop policies to ensure that the contracts complement and supplement efforts to fulfill its records management responsibilities.

INSPECTION PROGRAM
STAFFING TIME SHOULD BE INCREASED

One of the best ways NARS can improve agency records management practices is through its inspection program. NARS inspections consist of onsite work at agencies which results in formal reports to an agency or agencies pointing out weaknesses in their records management programs and suggesting improvements.

During fiscal year 1979, NARS Office of Records and Information Management spent 8.8 staff-years of analyst time on its inspection program. This amounted to only 6.7 percent of its productive analyst time. NARS officials advised us that they planned to spend about 12 staff-years on 1979 inspections. However, internal delays prevented NARS from

starting a word processing inspection which was planned for 1979. Prior to 1979, NARS did not have a management reporting system; therefore, we could not obtain comparable data on its inspection staffing in earlier years.

In January 1979, 80 percent of all Federal civilian employees worked at Federal locations outside the Washington, D.C., area. However, NARS inspection efforts at agency field offices totaled only 1 staff-year in fiscal year 1979. NARS headquarters officials said they have been dissatisfied with the input to inspection studies provided by their field office staff. They told us such input is often deleted from final inspection reports. NARS field officials feel they should be conducting more inspections.

The Commission on Federal Paperwork reported that NARS has been conservative in staffing its inspection efforts. As a result, NARS has not completed its cycle of inspecting all Federal agencies. NARS advised us that it has increased its output of inspection reports in recent years. Data provided by NARS shows that it produced five reports in fiscal years 1977 and 1978 and four in 1979. NARS told us that one inspection in 1979 included eight agencies and that a report was issued to each of the agencies. However, in our 1973 report entitled "Ways to Improve Records Management Practices in the Federal Government" (B-146743, Aug. 13, 1973), we found that NARS was conducting about four inspections a year. Therefore, the number of inspections being made has remained about the same.

We believe NARS should increase both its headquarters and field inspection efforts. Prior studies by us, the Commission on Federal Paperwork, and the President's Administrative Services Reorganization Task Force on Archives and Records support the need for such a move because of the potential for agency savings when they implement NARS recommendations. In reporting on the importance of NARS inspections, the President's Task Force stated that "An intensive evaluation [inspection] effort has the potential to reduce the Federal Government's paperwork costs. Even a 1 percent reduction amounts to \$430 million."

In our 1973 report, we recommended that NARS report agencies records management deficiencies to the President, OMB, and the Congress, as authorized by the Federal Records Act. Since that report, the 1976 amendments to the act required NARS to report each year to OMB and the Congress on

the results of inspections and evaluations of agency responses to its recommendations. Our review of NARS 1977 and 1978 annual reports showed that the inspection results and agency responses are reported in summary form. While not required by the Federal Records Act, we believe NARS should send copies of each individual inspection report to OMB and appropriate congressional committees. The scope and significance of NARS inspection reports would provide a better picture of how agencies fulfill their records management responsibilities and the benefits to be gained by implementing NARS recommendations. NARS annual report would then be more meaningful when commenting on agency actions on recommendations and improvements which are still needed.

OTHER AGENCIES SHOULD CONDUCT STUDIES

The Federal Records Act Amendments of 1976 directs the Administrator of General Services to conduct research to improve records management practices and programs and to designate the heads of executive agencies to conduct records management studies with respect to establishing systems and techniques designed to save time and effort in records management. The legislative history points out that the ability to involve other agencies rather than NARS independently conducting all studies would be of great benefit because some records management problems are better addressed by the specific agency concerned.

We feel that a close relationship exists between these two separately stated responsibilities. For example, in the area of office automation, Federal agencies often obtain new and sophisticated equipment. This equipment could be evaluated by the agencies. The results of such an evaluation could be made available to NARS and to other agencies to improve their records management programs. NARS has, and should exercise, the authority to direct the head of an agency to conduct such studies.

NARS recently completed a word processing productivity study by evaluating equipment in use at Federal agencies. According to NARS, the study was a research effort in support of word processing standards. The Assistant Archivist told us that he felt NARS is now in a position to test equipment and concepts, and that funds were needed to carry out this testing. We believe NARS should first determine whether equipment to carry out such testing is already available in another Federal agency.

The Acting Archivist in a speech in October 1979 indicated that NARS is now encouraging agency experimentation to determine the benefits of office automation. NARS is also developing a clearinghouse function to promote information interchange among Federal agencies. The objective of the clearinghouse is to record, collect, evaluate, and disseminate information on agencies records and information management activities and studies, and on office automation experiments leading to increased office productivity.

The Acting Archivist also noted that recent office automation projects in the Nuclear Regulatory Commission, the U.S. Air Force, and the Social Security Administration will be evaluated to determine their applicability to other agencies. He noted that NARS expects to encourage the heads of agencies to conduct these reviews.

The reliance on other agencies input will serve to expand NARS knowledge of agency records management programs and should enable NARS to use its own resources more effectively.

NARS SHOULD MONITOR ITS TRAINING PROGRAM

An important NARS program is the training courses it offers to Federal agencies. NARS courses are aimed at improving the skills of agency records managers and their support staff. The courses cover correspondence, directives, mail, forms, reports, micrographics, office copiers, word processing, and automated data processing.

In 1977 the Commission on Federal Paperwork stated that interviewees expressed concern about the reduced number of training courses scheduled, a drop in the quality of training, and the fact that NARS began to charge for its courses. The Commission pointed out that very few agency records personnel attended all or even a majority of the courses and few attended courses in their specialty area. NARS officials advised the Commission they would hire a training specialist and were implementing both short- and long-range reforms in the training program.

We discussed with NARS officials their efforts in response to the Commission on Federal Paperwork's concerns. They told us they were unable to hire a professional training specialist, but did appoint a training coordinator. We found that during fiscal years 1977 and 1978, 15 training

courses were added, updated, or restructured. However, our analysis of the training courses offered by NARS Office of Records and Information Management shows that of 40 courses scheduled in fiscal year 1978, 21, or 52 percent, were canceled. We found no information at NARS as to why the courses were canceled. In fiscal year 1979, 18 of 41 courses (44 percent) were canceled. NARS officials advised us that nine courses were canceled because of inadequate registration. Others were canceled because of unavailable course materials or lack of an available instructor.

We believe NARS should consider establishing a system to monitor participation in courses by Federal agencies. With such a system, NARS could contact non-participating agencies to determine what actions might be needed to get agency records management staff to attend its courses. Also, in our opinion, an inordinate number of courses are canceled due to lack of materials or an instructor. We believe that NARS should make whatever arrangements are necessary to ensure that materials and instructors are available for scheduled courses.

CONCLUSIONS

NARS is charged with the substantial responsibility of improving Federal records management practices. Inadequate planning and administrative deficiencies underlie many of the problems which are hampering NARS records management program.

NARS plans indicate that it attempts to cover too many issues with its limited staff. As a result, critical areas do not receive priority attention and the areas which are addressed suffer delays. We believe NARS should establish realistic planning goals. In addition, we believe that NARS should make greater use of other agencies to perform records management research studies as authorized by law.

NARS progress in issuing updated handbooks has been particularly slow. Since the Commission on Federal Paperwork report in 1977, NARS has yet to make any real progress in updating its handbooks. We believe more must be done in terms of committing adequate resources to handbook development and making greater use of expertise already developed by other agencies.

NARS has not developed policies on using consulting studies. Once received, NARS often does not use the data

provided. We believe, therefore, that in the future greater consideration should be given to the necessity for consultants to perform records management projects.

We believe inspections are a primary way NARS can demonstrate and encourage needed improvements in agency records management practices. However, inspection efforts have not increased as recommended by the Paperwork Commission. Also, copies of NARS inspection reports should be sent to OMB and appropriate congressional committees so that its annual report would be more meaningful.

Many of NARS' scheduled training courses were canceled. NARS should develop a system for monitoring agency participation in its courses. NARS should also arrange to have materials and instructors available for scheduled courses.

RECOMMENDATIONS

We recommend that the Administrator of General Services direct the Archivist of the United States to:

- Develop plans and establish priorities for using NARS staff resources to better address its records management responsibilities.
- Accelerate development of standards, guidelines, and handbooks.
- Before awarding any future consulting contracts, develop policies and procedures to ensure that the contracts provide services that contribute to NARS records management programs.
- Encourage agencies to provide more resources for records management studies and, if necessary, assert the Federal Records Act authority to do so.
- Monitor training course attendance to determine agency participation and ensure that preparations are made to have instructors and materials available for scheduled courses.
- Send copies of inspection reports to OMB and appropriate congressional committees.

AGENCY COMMENTS AND
OUR EVALUATION

GSA and NARS agreed in general with the recommendations. In commenting on our recommendation that NARS develop plans and establish priorities for using its staff resources to better address its records management responsibilities, NARS advised us of the following action. At the direction of the Administrator of GSA, NARS is conducting cost/benefit studies of its reimbursable technical assistance, inspections, and training. These studies will consider alternate strategies for directing resources to high priority program needs.

NARS commented at length on its handbook program. NARS stated that its 1975 draft word processing handbook as well as the Army handbook contained serious deficiencies. According to NARS, these handbooks contained concepts and standards that led to unsound assumptions about the cost effectiveness of word processing equipment and resulted in over procurement of equipment by the Army and other Federal agencies. NARS said it developed interim guidance in the form of Federal Property Management Regulation bulletins, training courses, publications, and presentations at conferences and symposiums. NARS then conducted research to develop an adequate word processing handbook, based on valid concepts and tested standards. However, this research was not conducted until fiscal year 1979, an undue delay in our view. As of April 1980, NARS had numerous comments from agencies on its draft handbook and estimates that another year may be required before it is published.

NARS also told us that it is not clear that the nine agency word processing handbooks we cite would not have been published if NARS had issued a handbook. NARS states that agency handbooks commonly translate NARS standards and guidelines into operating procedures. We agree this is common. However, in the absence of NARS standards and guidelines, the resources an agency uses in developing and publishing its own guidance would be increased. Further, the absence of NARS guidance may have promoted the overprocurement of word processing equipment referred to in its comments.

In responding to our recommendation on its training course attendance, NARS agreed that monitoring attendance would help identify agencies not participating in records

management courses. In addition, NARS showed that the number of courses presented in 1979 has increased to 24 courses over the 15 courses presented in 1975. According to NARS, announcing its schedule for courses not yet developed has been discontinued. This should eliminate cancellations due to unavailable course materials. NARS also told us that it is working with the Office of Personnel Management and the Department of Agriculture to improve records management training for Government personnel.

In regard to inspections, NARS stated that we overlooked improvements made in its program. For example, NARS cites its Government-wide inspections of a single records management program element, such as its mail management inspection. Multi-agency inspections were instituted by NARS in response to the 1976 amendments to the Federal Records Act. We believe they provide NARS with the opportunity to maximize the benefits of its inspection efforts.

NARS stated that a postponed word processing inspection reduced the amount of staff-time spent on inspections in 1979. NARS said the postponement was beyond its control and had the inspection proceeded as planned, additional time would have been spent on inspections in 1979. We found that the delay was within NARS and was caused by NARS inability to complete its preinspection questionnaire in fiscal year 1979. Regardless, in our opinion, it seems that NARS should have been able to use its staff on another inspection.

NARS agreed that more effort should be placed in regional inspections but does not believe it should be an 80 percent involvement as would be indicated by the Federal civilian workforce statistics. We are not suggesting that 80 percent of NARS inspection work be performed by its regions, but we do believe it should be greater than 1 percent. Without reviewing field activities, NARS cannot assess the effectiveness of records management policies established by agency headquarters, nor can it determine the need for additional policies and procedures.

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