

GAO

Report to the Ranking Member,
Committee on Finance, U.S. Senate

October 2010

NATIONAL
ARCHIVES AND
RECORDS
ADMINISTRATION

Oversight and
Management
Improvements
Initiated, but More
Action Needed



GAO

Accountability * Integrity * Reliability

Highlights of [GAO-11-15](#), a report to the Ranking Member, Committee on Finance, U.S. Senate.

Why GAO Did This Study

The mission of the National Archives and Records Administration (NARA) is to safeguard and preserve government records, ensuring continuing access to the essential documentation of the rights of American citizens and the actions of their government. However, in today's environment of fast-evolving information technology, federal agencies are creating vast and growing volumes of electronic records while continuing to create physical records in large numbers.

Accordingly, GAO was asked to assess NARA's effectiveness in overseeing the governmentwide management of records, including commenting on its capacity to identify risk of unlawful destruction of federal records; describe its ability to preserve permanent records; and assess its policies, procedures, and plans supporting key management and oversight capabilities (collaboration, governance, and human capital). To do so, GAO analyzed NARA documentation in these areas, interviewed agency officials, and reviewed prior work.

What GAO Recommends

GAO is making recommendations to help NARA build on its recent oversight activities and to fill gaps in its risk management and human capital management. In comments on a draft of the report, NARA concurred.

[View GAO-11-15 or key components.](#)
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October 2010

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

Oversight and Management Improvements Initiated, but More Action Needed

What GAO Found

The effectiveness of NARA's oversight has been improved by recent increases in its oversight activities: NARA has conducted its first governmentwide records management self-assessment survey, resumed agency inspections after a long gap, and expanded its reporting (including giving more complete information about specific agencies). These efforts have provided a fuller picture of governmentwide records management: in particular, NARA found that almost 80 percent of agencies were at moderate to high risk of unlawful destruction of records. Reporting of such results may also help influence agencies to give more priority to records management, which has historically been given low priority. However, these initiatives have limitations. For example, NARA's efforts to validate self-reported survey data are limited, as are its plans for inspections of agency records management; addressing these limitations could enhance the usefulness of these efforts as they continue to be developed. NARA also oversees agency records management through its review and approval of the schedules under which agencies may dispose of records. Following an extended effort to get agencies to schedule electronic records and systems, NARA increased the number of schedules approved per year. However, it has also increased the backlog of schedules awaiting its approval, increasing the risk that NARA's success in promoting scheduling could bring in more schedules than it can handle in a timely manner.

NARA faces challenges in preserving permanent records largely because of their volume, the finite resources available, and the technological challenges posed by electronic records. NARA has a large and persistent backlog of records on paper and other media needing preservation actions. Although it treated nearly 116,000 cubic feet of at-risk archival records in fiscal year 2009, the percentage of backlog remained constant at about 65 percent, and holdings requiring preservation grew from about 2.4 million cubic feet in 2008 to about 2.6 million cubic feet in 2009. For electronic records, NARA has an electronic records archive system that is still under development and does not yet include planned preservation functions. Until the system and its preservation capabilities are fully implemented, there is reduced assurance that NARA can ensure the preservation of all electronic records.

NARA's policies and procedures for collaboration, selected aspects of governance, and human capital are generally aligned with its strategic planning. For example, it is participating in numerous collaborative activities that support the goals and strategies in its strategic plan. However, more action is needed. For example, with regard to governance, although its organizational responsibilities are generally aligned with its strategic plan, NARA has not established an enterprise risk management capability, reducing its ability to anticipate future challenges and avoid potential crises. Finally, NARA has developed and begun to implement a strategic human capital plan, but this implementation has been delayed, which hinders the agency's ability to ensure that it has the workforce and skills it needs.

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Abbreviations

ERA	Electronic Records Archives
FTE	full-time equivalent
GPRA	Government Performance and Results Act
GSA	General Services Administration
NARA	National Archives and Records Administration
NCAST	NARA's Center for Advanced Systems and Technologies
NGA	National Geospatial-Intelligence Agency
OMB	Office of Management and Budget
OPM	Office of Personnel Management
OSD	Office of the Secretary of Defense

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United States Government Accountability Office
Washington, DC 20548

October 5, 2010

Senator Charles E. Grassley
Ranking Member
Committee on Finance
United States Senate

Dear Senator Grassley,

The mission of the National Archives and Records Administration (NARA) is to safeguard and preserve government records, ensuring continuing access to the essential documentation of the rights of American citizens and the actions of their government. However, in today's environment of fast-evolving information technology, this important mission is increasingly challenging. At the same time that paper and other physical records continue to be created in large numbers, federal agencies are creating vast and growing volumes of electronic records.

In light of this challenging environment, you asked us to undertake a review of the agency's ability to effectively carry out its mission of overseeing the management of federal records while preserving those of historic and intrinsic value.

As agreed, our objectives were to (1) assess NARA's effectiveness in overseeing the governmentwide management of records, including commenting on its capacity to identify risk of unlawful destruction of federal records; (2) describe its ability to preserve permanent records; and (3) assess its policies, procedures, and plans supporting key management and oversight capabilities: governance, human capital, and collaboration.

To assess NARA's effectiveness in overseeing governmentwide records management, we examined its use of the oversight activities—surveys, studies, inspections, and reporting—defined in the Federal Records Act and its process for approving records schedules. We examined documents, interviewed agency officials, and obtained input from a panel of experts and from other federal records managers. To comment on NARA's capacity to identify risk of unlawful destruction of federal records, we reviewed applicable laws, reviewed the results of a NARA survey, and met with NARA records management staff to identify risk factors.

To describe NARA's ability to preserve permanent records, we met with NARA preservation staff; reviewed NARA's survey of its physical records

and its backlog of records needing preservation actions and assessed their reliability; and analyzed NARA's ability to process its backlog. We also reviewed external research on electronic records, interviewed staff involved in developing NARA's Electronic Records Archives (ERA) system, and drew on our previous reports about the status of ERA.

To assess NARA's policies, procedures, and plans supporting key management and oversight capabilities, we analyzed NARA management, strategic planning, and policy documents against requirements of the Government Performance and Results Act (GPRA)¹ and our risk management framework in order to determine whether NARA lines of responsibility were aligned with its strategic plans and whether it was conducting an appropriate risk management program. To assess human capital management, we compared NARA's human capital management capabilities and its human capital strategic plan against our Strategic Human Capital Framework.² We interviewed NARA officials and reviewed progress in implementing its human capital plan against the plan's milestones. To evaluate NARA's collaboration capabilities, we interviewed policy and planning staff, analyzed agency policies and procedures related to collaboration, obtained a list of NARA collaborative projects, and examined whether collaborative activities specified in the strategic plan were being carried out.

We reached out to the federal records management community to obtain information on several issues. We worked with the National Academy of Sciences to convene a panel of experts. We also obtained views of selected federal government records managers at the Department of Defense and surveyed members of the Federal Information and Records Managers Council, an organization of federal records managers. Appendix I provides further details on our objectives, scope, and methodology.

We conducted this performance audit from October 2009 to October 2010 in the Washington, D.C., metropolitan area in accordance with generally accepted government auditing standards. Those standards require that we

¹The Government Performance and Results Act of 1993, Pub. L. No. 103-62, 107 Stat. 285 (Aug. 3, 1993), among other things, requires agencies to prepare strategic plans and annual performance plans that articulate goals for the upcoming fiscal year that are aligned with their long-term strategic goals.

²GAO, *A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002).

plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

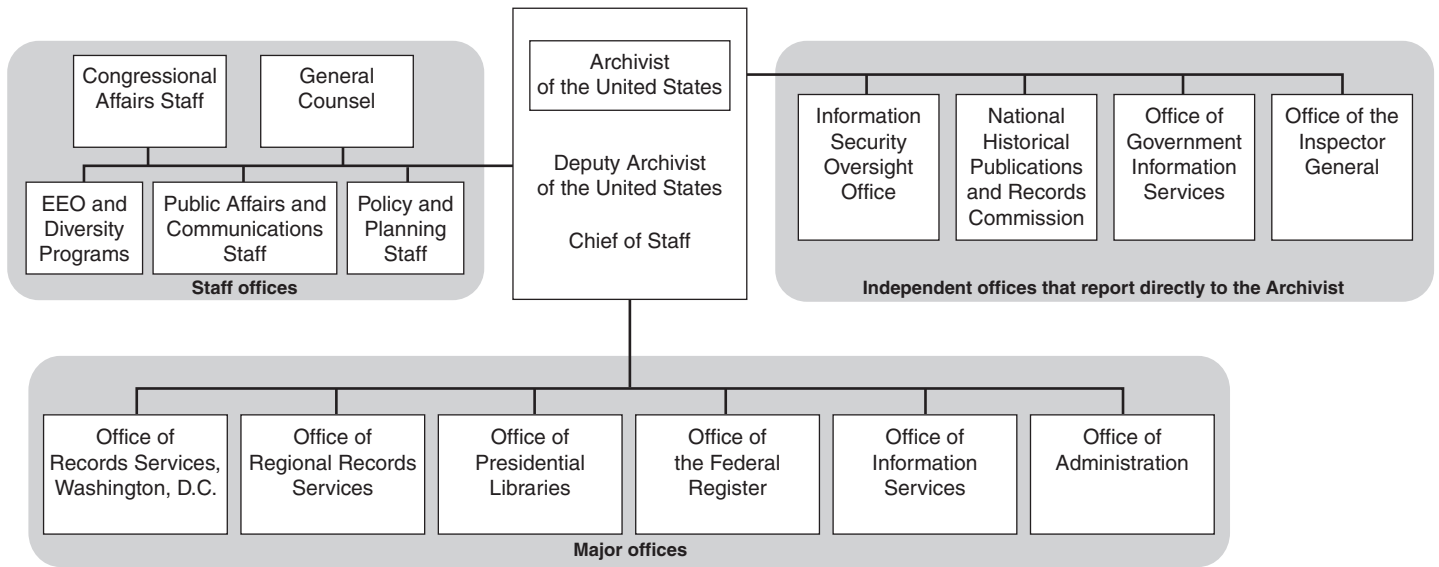
NARA's mission is to safeguard and preserve the records of the U.S. government, ensuring that the people can discover, use, and learn from this documentary heritage. In this way, NARA is to ensure continuing access to the essential documentation of the rights of American citizens and the actions of their government.

In carrying out this mission, NARA (among other things) is to provide guidance and assistance to federal officials on the management of records; determine the retention and disposition of records; store agency records in records centers from which agencies can retrieve them; receive, preserve, and make available permanently valuable federal and presidential records; and centrally file and publish federal laws and administrative regulations, the President's official orders, and the structure, functions, and activities of federal agencies through the daily *Federal Register*.

NARA Organization and Functions

NARA is organized into six main offices, as well as a number of offices carrying out particular functions. As shown in the organization chart in figure 1, of NARA's six major offices, two are support offices (the Office of Administration and the Office of Information Services), and four carry out the organization's primary missions (the Offices of Records Services, Washington, D.C.; Regional Records Services; the Federal Register; and Presidential Libraries). In addition, four independent offices with specialized missions report directly to the Archivist of the United States, and various staff offices (such as General Counsel) provide support.

Figure 1: NARA Organizational Chart



Source: NARA.

Table 1 shows these organizations, major functions, and the levels of staff in each (expressed as full-time equivalent—FTE).

Table 1: NARA Organizations, Missions, and Staffing

Organization	Mission and functions	FTEs ^a
Office of the Archivist and staff offices	Plan, develop, and administer NARA programs and functions.	81
Major offices		
Office of Records Services, Washington, D.C.	Takes custodial responsibility for the historically valuable records of the three branches of the federal government in the Washington, D.C., area. Appraises, ^b accessions, ^c preserves, describes, and provides access to these records. Provides records management services to Washington, D.C., area.	810
Office of Regional Records Services	Operating on a reimbursable fee-for-service basis, stores federal agency records in 17 records centers nationwide. Also provides records management services to regions and operates regional archives.	1,481
Office of Presidential Libraries	Administers a nationwide network of 13 presidential libraries.	435
Office of the Federal Register	Promulgates and publishes federal documents under the Federal Register Act and other acts.	58
Office of Administration	Performs administrative services including management of acquisitions, finance, budget, facilities, property, human resources, organization and staff development, security, and duties of the Chief Financial Officer.	182
Office of Information Services	Carries out NARA's information technology program and duties of the Chief Information Officer (CIO).	117

Organization	Mission and functions	FTEs ^a
Independently reporting offices		
Information Security Oversight Office	Administers the program for classifying, safeguarding, and declassifying national security information. Also responsible for policy and oversight of the governmentwide security classification system and the National Industrial Security Program.	29
National Historical Publications and Records Commission	A grant-making affiliate of NARA, established by Congress to promote the preservation and use of America's documentary heritage. Funds institutions engaged in archives-related activities.	9
Office of Government Information Services	Reviews Freedom of Information Act activities governmentwide and helps to resolve disputes between requesters and agencies.	6
Office of the Inspector General	Carries out audits, investigations, inspections, management assistance, and reports relating to the administration of NARA's programs and operations.	20
Total		3,228

Source: GAO analysis of NARA information.

^aNARA staffing projections as of July 2010.

^bAppraisal is the process by which NARA determines the value and thus the final disposition of federal records.

^cAccession is the act and procedures involved in a transfer of records into the legal custody of the National Archives.

NARA's operations are dispersed throughout more than 40 facilities in the United States. These facilities include the National Archives Building in Washington, D.C. (housing the nation's founding documents); the nearby Archives II facility in College Park, Maryland; and its nationwide network of regional archives, records centers, and presidential libraries and museums.

Organizations Primarily Responsible for Federal Records Management and Preservation

Two offices share primary responsibility for performing NARA's mission to safeguard and preserve federal records: the Office of Records Services, Washington, D.C., and the Office of Regional Records Services. These offices also account for more than two-thirds of NARA's approximately 3,200 FTE employees.³

The Office of Records Services, Washington, D.C., has custodial responsibility for the historically valuable records of the three branches of the federal government in the Washington, D.C., area. Through its programs, the office appraises, accessions, preserves, describes, and provides access to these records. Besides the head office, it has six main subdivisions, as shown in table 2.

³NARA's work is also supported by contractors and volunteers.

Table 2: Organizations, Functions, and Staffing of Office of Records Services, Washington, D.C.

Organization	Function	FTEs ^a
Head office (Assistant Archivist for Records Services, Washington, D.C.)	Develops, coordinates, and monitors overall plans, programs, and resource allocations for the office.	16
Access Programs	Responsible for archival services and customer services relating to records accessioned to the Archives.	388
Center for the National Archives Experience	Responsible for museum, visitor, and educational services and special events.	35
National Declassification Center	Responsible for direct guidance, technical support, and assistance to federal agencies relating to declassification matters; conducts reviews and plans and coordinates agency reviews of security-classified materials for declassification.	66
Center for Legislative Archives	Responsible for managing, preserving, and providing access to legislative records.	19
Modern Records Programs	Responsible for NARA's nationwide records management program.	195
Preservation Programs	Responsible for long-range preservation of federal, presidential, and donated materials.	91
Total		810

Source: GAO analysis of NARA information.

^aNARA staffing projections as of July 2010.

The Office of Regional Records Services is organized into nine regions (each headed by a Regional Administrator) plus the National Personnel Records Center in St. Louis, Missouri. Each region operates records centers, regional archives, and records management programs for the region. In all, the Office of Regional Records Services manages 17 records centers nationwide, which operate on a reimbursable fee-for-service basis. They provide federal agencies with storage of agency records not needed in day-to-day operations, among other services, including records management assistance. The regional archives provide the public with free access to the significant historical records of federal agencies for purposes of education, genealogy, history, and research, as well as to facilitate publications in all media. Of the staff of more than 1,400, about half (745) are assigned to the Federal Personnel Records Center, with the rest allocated to the regions.

In addition, the Office of Information Services plays an important role in records management and preservation through two of its components:

- The Electronic Records Archives Program Office manages the program to develop ERA, a system that is intended to preserve and provide access to huge volumes of all types and formats of electronic records, independent of their original hardware or software.

-
- The Center for Advanced Systems and Technologies works to discover and promote archival technologies, including preservation technologies, to NARA's offices.

To coordinate records management activities that are performed in both headquarters and the regions, NARA set up the National Records Management Program, headed by the Director of Modern Records Programs within the Office of Records Services, Washington, D.C. Among the goals of setting up the National Records Management Program was to be more responsive to NARA and agency records management needs and goals, improve internal communications, and help clarify staff roles and responsibilities. The program includes about 100 records management staff working in both the Washington, D.C., office and the regions (each region operates one or more records center facilities, each of which has two to four staff that perform records management work).

NARA Funding and Allocation of Budget Authority

NARA's fiscal year 2009 appropriation was about \$459 million, while its fiscal year 2010 appropriation is about \$470 million. NARA's budget request for fiscal year 2011 is about \$460 million. In addition to annual appropriations acts, NARA's operations are funded through revenues from the National Archives Trust Fund,⁴ Gift Fund,⁵ and Revolving Fund (which funds the operations of the regional records centers).⁶ NARA's operations

⁴The National Archives Trust Fund and Presidential Library Trust Funds budget authority includes revenues generated from the sale of publications, museum shop sales, paper reproductions, audiovisual reproductions, library admissions, educational conferences, and interest income. Expenditures are made for the cost of museum shop inventory, personnel, operational and financial systems, equipment, and reproduction supplies. The National Archives Trust Fund and Presidential Library Trust Funds earned revenue of \$18 million in fiscal year 2009.

⁵The Gift Fund's budget authority includes donations to NARA and interest earned on those gifts and endowments. It was established to administer incoming gifts and bequests for the benefit of, or in connection with, the agency's archival and records activities. Expenditures are made for various programs, including historical research, conferences, archival and cultural events, and publications. In fiscal year 2009, the gift fund received donations of \$2 million.

⁶The Revolving Fund's budget authority includes revenue generated from the temporary federal agency records stored in NARA service facilities. It provides storage, transfer, reference, refile, and disposal services for a standard fee. In fiscal year 2009, the Revolving Fund earned revenue of \$152 million.

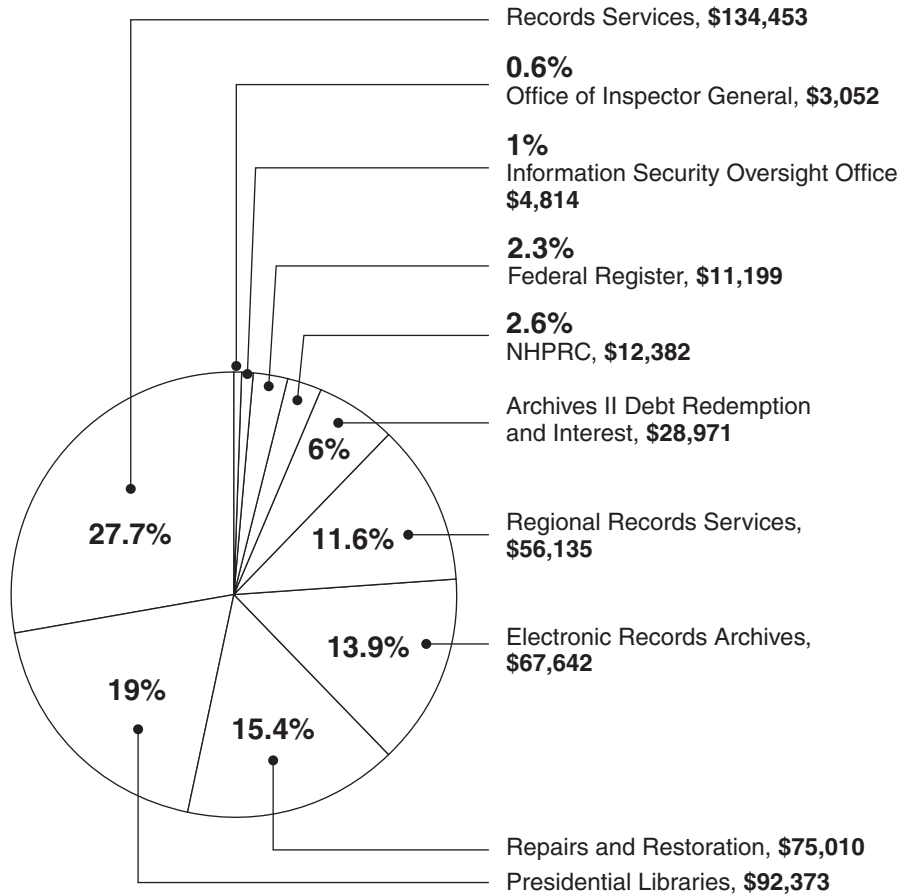
at the presidential libraries are also partially supported by a Presidential Library Trust Fund.⁷

Figure 2 provides the reported breakdown of the allocation of budget authority provided to NARA by annual appropriations acts for fiscal year 2009 (\$486 million, which includes \$26 million carried over in multi-year and no-year funds available for obligation).

⁷The various presidential libraries are also supported by separate gift funds, endowments, and presidential library foundations.

Figure 2: Reported Allocation of Total Fiscal Year 2009 Direct Appropriations of \$486,031,000

Dollars in thousands



Source: GAO analysis of NARA data.

Note: Entry for NHPRC covers grants and operating expenses for the National Historical Publications and Records Commission.

NARA's Responsibilities for Records Management and Preservation

The Federal Records Act gives NARA responsibilities regarding both federal records management and preservation of permanent records.⁸ Thus, NARA supports agency management of records used in everyday

⁸Relevant NARA regulations implementing the Federal Records Act are found at 36 C.F.R. §§ 1220–1239.

Responsibility for Records
Management Is Shared across
the Government

operations (both temporary and permanent) and ultimately takes control of permanent agency records judged to be of historic value. Of the total number of federal records, NARA estimates that less than 3 percent are designated permanent.

By statute, some of the responsibilities for oversight of federal records management are divided across several agencies. Under the Federal Records Act, NARA shares a number of records management responsibilities and authorities with the General Services Administration (GSA).⁹ Under the Paperwork Reduction Act¹⁰ and the E-Government Act,¹¹ the Office of Management and Budget (OMB) also has records management oversight responsibilities.

Further, the heads of federal agencies are responsible for their agencies' records. The Federal Records Act establishes requirements for records management programs in federal agencies. Each federal agency is required to make and preserve records that (1) document the organization, functions, policies, decisions, procedures, and essential transactions of the agency and (2) provide the information necessary to protect the legal and financial rights of the government and of persons directly affected by the agency's activities. (NARA is assigned responsibilities for assisting federal agencies in this area.) Effective management of these records is critical for ensuring that sufficient documentation is created; that agencies can efficiently locate and retrieve records needed in the daily performance of their missions; and that records of historical significance are identified, preserved, and made available to the public.

Records must be managed at all stages of their life cycle, which includes records creation or receipt, maintenance and use, and disposition. Agencies *create* records to meet the business needs and legal responsibilities of federal programs and (to the extent known) the needs of internal and external stakeholders who may make secondary use of the records. To *maintain and use* the records created, agencies are to establish internal recordkeeping requirements for maintaining records,

⁹These shared responsibilities are due in part to the origins of NARA. The 1984 National Archives and Records Administration Act, Pub. L. No. 98-497, 98 Stat. 2280 (Oct. 19, 1984), transferred the functions of GSA's National Archives and Records Service to the newly created NARA.

¹⁰See 44 U.S.C. § 3504.

¹¹See 44 U.S.C. § 3602.

consistently apply these requirements, and establish systems that allow them to find records that they need. *Disposition* involves transferring records of permanent, historical value to NARA for archiving (preservation) and destroying all other records that are no longer needed for agency operations.

NARA is responsible for issuing records management guidance; working with agencies to implement effective controls over the creation, maintenance, and use of records in the conduct of agency business; approving the disposition (destruction or preservation) of records; and providing storage facilities for agency records. The Federal Records Act also gives NARA the responsibility for conducting inspections or surveys of agencies' records and records management programs and practices; conducting records management studies; and reporting the results of these activities to the Congress and OMB.

NARA Must Approve Disposition of Federal Records

Under the Federal Records Act, disposition of any records (destruction or transfer to the Archives for preservation) requires the approval of the Archivist of the United States. *Scheduling* is the means by which NARA and agencies identify federal records and determine time frames for disposition. Creating records schedules involves identifying and inventorying records, appraising their value, determining whether they are temporary or permanent, and determining how long records should be kept before they are destroyed or turned over to NARA for archiving. For example, one general records schedule permits civilian agencies to destroy case files for merit promotions (2 years after the personnel action is completed or after an audit by the Office of Personnel Management, whichever is sooner). No record may be destroyed or permanently transferred to NARA unless it has been scheduled, so the schedule is of critical importance. Without schedules, agencies would have no clear criteria for when to dispose of records and, to avoid disposing of them unlawfully, would have to maintain them indefinitely.

NARA works with agencies to help schedule records, and it must approve all agency records schedules. It also develops and maintains general records schedules covering records common to several or all agencies. According to NARA, records covered by general records schedules make up about a third of all federal records. For the other two thirds, NARA and the agencies must agree upon agency-specific records schedules.

Destruction of records before their scheduled disposition date or without NARA approval is unauthorized and unlawful. Specifically, unlawful destruction occurs when

-
- permanent records or records that have not been scheduled are destroyed,
 - temporary records are destroyed before the end of their retention period, or
 - records required to be held for other reasons, such as litigation or Freedom of Information Act requests, are destroyed.¹²

Agency heads are responsible for preventing unauthorized destruction of records and must make sure employees are informed about the requirement, implement policies and procedures to ensure that records are protected, and report any unauthorized removal or destruction to NARA.¹³ If NARA learns of a potential or actual instance of unlawful destruction, the Archivist is required to notify the agency head and assist in initiating action through the Attorney General for the recovery of records and other redress. If the head of the agency does not initiate an action within a reasonable period of time, the Archivist is to request the Attorney General to act and notify the Congress.

NARA Is Responsible for Preservation of Permanent Records

As the nation's archivist, NARA is the legal custodian of the records of federal agencies that are determined to have sufficient historical or other value to warrant their continued preservation by the U.S. government. NARA also accepts for deposit to its archives many of the records of the Congress, the Architect of the Capitol, and the Supreme Court. In addition, NARA accepts papers and other historical materials of the presidents of the United States, documents from private sources that are appropriate for preservation (including electronic records, motion picture films, still pictures, and sound recordings), and records from agencies whose existence has been terminated.

NARA archives vast quantities of federal records in various formats. According to the agency, its 28 archives and presidential libraries across the United States hold almost 4 million cubic feet of permanent federal paper, photographic, audio, video, and film records and 600,000 artifacts. Its multimedia collections include nearly 300,000 reels of motion picture film; more than 15 million maps, charts, aerial photographs, architectural drawings, patents, and ship plans; more than 200,000 sound and video recordings; and nearly 6 million photographs and graphics. In addition, as

¹²36 C.F.R. § 1230.3.

¹³36 C.F.R. § 1230.10.

of August 2010, NARA has archived about 82.4 terabytes of electronic information.¹⁴

To preserve electronic records, NARA has been working since 2001 to develop an electronic records archive system that is intended to preserve and provide access to very large volumes of all types and formats of electronic records, independent of their original hardware or software. NARA plans for the system to manage the electronic records from their ingestion through preservation and dissemination to customers. The ERA system is being developed in five phases, or increments. NARA has certified initial operating capability of the first two phases of ERA. NARA plans to complete development of the remaining increments and achieve full operating capability by 2012.

We Have Previously Reported on NARA's Challenges and Federal Records Management

We have previously reported on the risks NARA faces in its acquisition of ERA, on NARA's oversight of federal records management, and on the challenges of electronic records management.

From 2002 onward, we have issued a series of reports on ERA and its development.¹⁵ Most recently, we reported, among other things, that NARA's plans for completing the final two increments were not sufficiently specific: the most recent expenditure plan did not detail what system capabilities would be delivered in the final two ERA increments or dates for completion.¹⁶ Further, NARA's management of the requirements for ERA had weaknesses: NARA had established an initial set of high-level

¹⁴A terabyte is about 1 trillion bytes, or 1000 gigabytes.

¹⁵GAO, *Information Management: Challenges in Managing and Preserving Electronic Records*, [GAO-02-586](#) (Washington, D.C.: June 17, 2002); *Records Management: Planning for the Electronic Records Archives Has Improved*, [GAO-04-927](#) (Washington, D.C.: Sept. 23, 2004); *Information Management: Acquisition of the Electronic Records Archives Is Progressing*, [GAO-05-802](#) (Washington, D.C.: July 15, 2005); *Electronic Records Archives: The National Archives and Records Administration's Fiscal Year 2006 Expenditure Plan*, [GAO-06-906](#) (Washington, D.C.: Aug. 18, 2006); *Information Management: The National Archives and Records Administration's Fiscal Year 2007 Expenditure Plan*, [GAO-07-987](#) (Washington, D.C.: July 27, 2007); *Information Management: Challenges in Implementing an Electronic Records Archive*, [GAO-08-738T](#) (Washington, D.C.: May 14, 2008); and *National Archives: Progress and Risks in Implementing its Electronic Records Archive Initiative*, [GAO-10-222T](#) (Washington, D.C.: Nov. 5, 2009).

¹⁶GAO, *Electronic Records Archive: Status Update on the National Archives and Records Administration's Fiscal Year 2010 Expenditure Plan*, [GAO-10-657](#) (Washington, D.C.: June 11, 2010).

requirements to guide the system's development, but about 43 percent of the requirements had not been allocated to the last two increments, and NARA officials stated that it was uncertain whether they would be implemented at all. Finally, NARA stated that it had reinterpreted some of the requirements in its original requirements document but had not updated it. The lack of a current set of requirements is a significant risk. If requirements are incomplete and out of date, the system could be completed without addressing all necessary requirements or with functionality that meets requirements that are no longer valid. Accordingly, we recommended that NARA ensure that ERA's requirements are managed using a disciplined process that ensures that requirements are traceable throughout the project's life cycle and are kept current.

We have also made recommendations to NARA on its oversight of federal records management. Our recommendations were aimed at improving NARA's insight into the state of federal records management as a basis for determining where its attention is most needed. In 1999, in reporting on the substantial challenge of managing and preserving electronic records in an era of rapidly changing technology,¹⁷ we noted that NARA did not have governmentwide data on the electronic records management capabilities and programs of all federal agencies. Accordingly, we recommended that NARA conduct a governmentwide survey of these programs and use the information as input to its efforts to re-engineer its business processes. However, instead of doing a governmentwide baseline assessment survey as we recommended, NARA planned to obtain information from a limited sample of agencies, stating that it would evaluate the need for such a survey later.¹⁸

In 2002, we reported that because NARA did not perform systematic inspections of agency records management, it did not have comprehensive information on implementation issues and areas where guidance needed strengthening.¹⁹ We noted that in 2000, NARA had suspended agency evaluations (inspections) because it considered that these reached only a few agencies, were often perceived negatively, and resulted in a list of

¹⁷GAO, *National Archives: Preserving Electronic Records in an Era of Rapidly Changing Technology*, GGD-99-94 (Washington, D.C.: July 19, 1999).

¹⁸In 2001, a NARA-sponsored study was released reporting on both a recordkeeping study performed by SRA International and a series of records system analyses performed by NARA staff.

¹⁹GAO-02-586.

records management problems that agencies then had to resolve on their own. We recommended that it develop a strategy for conducting systematic inspections of agency records management programs to (1) periodically assess agency progress in improving records management programs and (2) evaluate the efficacy of NARA's governmentwide guidance.

In response to our recommendations, NARA devised a strategy for a comprehensive approach to improving agency records management that included inspections and identification of risks and priorities. Subsequently, it also developed an implementation plan that included undertaking agency inspections based on a risk-based model, government studies, or media reports.²⁰

In 2008, we reported that under its oversight strategy, NARA had performed or sponsored six records management studies in the previous 5 years, but it had not conducted any inspections since 2000 because it used inspections only to address cases of the highest risk, and no recent cases met its criteria.²¹ In addition, NARA's reporting to the Congress and OMB did not consistently provide evaluations of responses by federal agencies to its recommendations, as required, or details on records management problems or recommended practices that were discovered as a result of inspections, studies, or targeted assistance projects. Accordingly, we recommended that NARA develop and implement an oversight approach that provides adequate assurance that agencies are following NARA guidance, including both regular assessments of agency records and records management programs and reporting on these assessments. NARA agreed with our recommendations and devised a strategy that included annual self-assessment surveys, inspections, and reporting, which it has now begun to implement.

Most recently, we testified on the challenges of managing electronic records and commented on the low priority that records management has historically received within the federal government.²² Our past reports identified persistent weaknesses in federal records management, including

²⁰[GAO-06-906](#).

²¹GAO, *Federal Records: National Archives and Selected Agencies Need to Strengthen E-Mail Management*, [GAO-08-742](#) (Washington, D.C.: June 13, 2008).

²²GAO, *Information Management: The Challenges of Managing Electronic Records*, [GAO-10-838T](#) (Washington, D.C.: June 17, 2010).

a lack of policies and training. We also noted some of the challenges of managing electronic records: For example, electronic information is being created in volumes that pose a significant technical challenge to our ability to organize and make it accessible. Electronic records range in complexity from simple text files to highly complex formats with embedded computational formulas and dynamic content, and new formats continue to be created. Further, in a decentralized environment, it is difficult to ensure that records are properly identified and managed by end users on individual desktops (the “user challenge”). We concluded that technology alone cannot solve the problem without commitment from agencies, noting (among other things) that automation will not solve the problem of lack of priority given to records management, which is of long standing.

NARA Is Improving its Oversight Activity, but More Remains to Be Done

The effectiveness of NARA’s oversight activity has been improved by recent initiatives. However, these initiatives have limitations, and NARA’s oversight alone cannot solve the persistent problems facing federal records management.²³

- NARA has begun to increase its efforts to assess governmentwide records management and its reporting of results. Although the Federal Records Act gives NARA responsibility for oversight activities (including inspections, surveys, and reporting), until recently, its performance of these activities was limited. It has now completed its first governmentwide records management self-assessment survey, resumed agency inspections after a long gap, and increased its reporting. These new efforts have provided NARA with a fuller picture of governmentwide records management, including an assessment by agency of the risk of unauthorized destruction of federal records; as a result, it is in a better position to determine where records management improvements are most needed, develop and update guidance, and hold agencies accountable by publishing assessments of their records management programs. NARA plans to use these oversight activities to develop baselines against which to assess future progress; however, it has not yet developed plans for adequately validating self-reported data or targeting inspections of agency records and records management programs to achieve governmentwide results. As NARA continues to build its oversight program, such activities will be important to provide assurance that reported changes from

²³In our recent testimony, [GAO-10-838T](#), we describe a number of challenges facing federal records management.

baseline scores reasonably reflect actual performance.

- NARA also provides oversight through its appraisal and scheduling work with agencies, in which it appraises agency records for their permanent value (among other things) and reviews and approves agency disposition schedules, in accordance with the Federal Records Act. Following an extended effort to get agencies to submit schedules for unscheduled systems containing electronic records, NARA has increased the number of schedules it has approved per year, but nevertheless has an increased backlog of schedules awaiting approval. NARA faces the risk that its success in getting agencies to schedule their systems may result in more schedules being submitted than it can handle in a timely manner. Unless NARA assesses this risk and develops appropriate mitigation plans, the backlog may increasingly hinder agencies' records management.

Although NARA activities alone cannot solve the persistent problems facing federal records management (agency heads are responsible for their agencies' records and records management), building and improving on NARA's oversight activities could help both NARA and agencies more effectively focus resources on areas needing improvement.

NARA Uses Surveys, Studies, and Inspections to Assess Governmentwide Records Management, but Limitations Remain to Be Addressed

Oversight addresses whether organizations are carrying out their responsibilities and serves to detect other shortcomings. Our reports emphasize the importance of effective oversight of government operations by individual agency management, by agencies having governmentwide oversight responsibilities, and by the Congress. Various functions and activities may be part of oversight, including monitoring, evaluating, and reporting on the performance of organizations and their management and holding them accountable for results.

The Federal Records Act gave NARA responsibility for oversight of agency records management programs by, among other functions, making it responsible for conducting inspections or surveys of agencies' records and records management programs and practices; conducting records management studies; and reporting the results of these activities to the Congress and OMB.²⁴ Consequently, as our previous work pointed out, it is important for NARA to have a governmentwide picture of the state of

²⁴In particular, the reports are to include evaluations of responses by agencies to any recommendations resulting from inspections or studies that NARA conducts and, to the extent practicable, estimates of costs to the government if agencies do not implement such recommendations.

federal records management programs to help it to hold agencies accountable, as well as to determine areas where its guidance needs strengthening.²⁵

NARA has recently undertaken efforts to gather governmentwide information to help it assess the status of federal records management and risks of unauthorized disposition (including destruction) of records. In September 2009, NARA sent the first of a promised series of annual mandatory records management self-assessment surveys to 242 federal records officers from cabinet-level agencies, agency components, and independent agencies; the survey's goal was to determine how effectively agencies were meeting statutory and regulatory requirements for records management. Agencies were asked 34 questions designed to obtain basic information about agencies' records management programs in five areas: program management, records disposition, vital records, electronic records, and e-mail records. NARA used the data collected to categorize agencies according to the level of risk to records associated with the state of agencies' records management programs. According to NARA, ineffective records management programs are the most significant indicators of risk of unauthorized disposition of records.²⁶

NARA's report on the self-assessment survey, released in April 2010,²⁷ described strengths and weaknesses in agencies' records management programs. It concluded that almost 80 percent of agencies were at moderate or high risk of improper destruction of records;²⁸ that is, the risk that permanent records will be lost or destroyed before they can be transferred to NARA for archiving or that other records will be lost while they are still needed for government operations or legal obligations. In particular, of the 220 (91 percent) federal agencies and components that

²⁵[GAO-08-742](#).

²⁶According to NARA officials, scheduled records are less at risk because scheduling presupposes that an agency has key controls in place, such as an inventory, file plan, and records management directive. Other indicators of risk include out-of-date schedules, records created by an entity that is going out of business; records created by multiple agencies, and lack of knowledgeable leadership for a records management program.

²⁷NARA, *Records Management Self-Assessment 2009: An Assessment of Records Management Programs in the Federal Government* (April 2010).

²⁸NARA assessed risk by calculating a weighted score based on agencies' responses to the 34 survey questions. Scores above 90 of 100 possible points are considered low risk, 60 to 89 are moderate risk, and below 60 are high risk.

responded, 36 percent were at high risk in their records management programs and 43 percent were at moderate risk. Overall, only 21 percent of federal agencies and components responding were at low risk. For electronic records, 39 percent were at high risk, and for e-mail, 48 percent were at high risk. The Archivist referred to these results as “alarming” and “worrisome”,²⁹ in a subsequent oversight hearing, the director of NARA’s Modern Records Program testified that the findings were “troubling” and “unacceptable.”

NARA has also obtained governmentwide information on one facet of records management—electronic records scheduling—through its efforts to ensure that electronic systems holding records are scheduled. NARA has periodically requested agencies to provide summary reports documenting their progress.³⁰ By September 30, 2009, NARA had received electronic records scheduling reports from 160 of 240 federal agencies or components for which it had been tracking electronic records scheduling, for a 67 percent response rate. In June 2010, it summarized the results of these reports.³¹ NARA determined that 25 percent were in the moderate to high risk category for failing to schedule 90 percent or more of their electronic records. Forty-two percent were rated low risk, and 33 percent did not respond to NARA’s request for information.

These information-gathering efforts are important means for helping to assess federal records management and risks to records. The 2009 self-assessment in particular provided NARA useful oversight information, including a broad picture of governmentwide records management that was not previously available. The self-assessment survey adds to NARA’s ability to assess the risk of unauthorized destruction of records by increasing its broad knowledge of the status of agency records management programs; previously, although NARA’s regular work with agencies on scheduling and disposition of records provided it insight into agencies’ activities at the end of the records life cycle, NARA officials agreed that its insight into records management at earlier stages—that is, creation, maintenance, and use—had been more limited.

²⁹AOTUS blog, <http://blogs.archives.gov/aotus/?p=186> (April 20, 2010).

³⁰NARA requested these reports in October 2008, April 2009, and August 2009.

³¹NARA, *NARA’s Electronic Records Project, Summary Report FY 2005–FY 2009* (June 15, 2010).

In addition, NARA's work conducting the self-assessment survey raised issues for further study, such as the role of the departmental records officer and appropriate level of records management staffing. It also provided NARA with important operational experience to apply to improving further surveys. According to the survey report, the results of the first few self-assessments will provide a baseline for records management in the federal government and, along with findings from agency inspections and records management studies, will allow it to assess more thoroughly records management within individual agencies and throughout the federal government. NARA has committed to conducting the self-assessment survey annually, and it conducted a second survey in May and June 2010 (at the time of our review, NARA had not yet published the results of this second survey).

In addition, NARA has increased its reporting on the results of its oversight activities. In the past, NARA had been reluctant to report negative news about individual agencies' records management, which we attributed to an organizational preference for using persuasion and cooperation when working with agencies.³² We noted that this reduced its ability to hold agencies accountable. In contrast, this year NARA reported fully on the results (both negative and positive) of its self-assessment survey and its electronic records systems scheduling project. The current reports not only provide summary results and analysis, they also list each agency or component's results individually. Also, besides sending the self-assessment report to the Congress and posting it on its Web site, NARA made efforts to publicize the results, including announcements through a press release, on Twitter, and on two blogs: those of the Archivist and of NARA's National Records Management Program. Further, the evaluation sections in NARA's performance and accountability reports for fiscal years 2008 and 2009 were more extensive than in 2007, and included sections on challenges and risks. These sections discuss specific agencies where NARA identified significant records management program risks and cases of alleged unauthorized disposition of federal records. By widely reporting results by agency, NARA has taken an important step toward improving the visibility of records management to senior agency managers, the Congress, and the public, potentially raising the priority that agencies assign to records management.

³² [GAO-08-742](#).

Although instituting and reporting fully on annual self-assessment surveys is a positive step, the initial survey had limitations. In its report, NARA identified issues that it considered to affect the reliability and usefulness of the data in its first self-assessment survey. Specifically:

- Not all regulated agencies were covered.³³ According to NARA, its list of agency records contacts, to whom it sent the surveys, was not always accurate: the distribution list was incomplete, and some people included on the list were not responsible for their agencies' records management programs. In addition, NARA reported that some agencies did not return surveys because they did not have an assigned records management officer responsible for completing the task, they believed they were not required to respond, or for other reasons, including inadvertent oversight.
- Another issue involves the roles of departmental and component-level records officers. According to NARA officials, scoring was affected by issues related to NARA's level of knowledge of the responsibilities of each department-level records officer. According to NARA, agencies of comparable size and complexity might have one records officer answering on behalf of the organization, or several component-level records officers answering for each component.³⁴ Some departments do not have a departmental records officer. Some department-level records officers responded for the entire organization, but, in at least one case, the department-level contact did not respond and deferred to the components.
- Some questions were unclear or inapplicable. Although NARA ran a focus group and pilot test to obtain feedback on the survey questions, it reported that responses and comments indicated that the wording of some questions was unclear. For instance, some respondents answered "no" when their comments indicated they should have answered "yes," and vice versa. In addition, NARA found that some questions on the survey were not applicable to very small organizations (less than 100 FTEs), but a "no" answer reduced their score, so that these organizations were penalized inappropriately in the scoring.

NARA has taken steps to reduce the effect of these issues on the second survey. According to NARA officials, they gathered additional information on records contacts, including the areas covered by departmental records

³³Agencies regulated under 36 C.F.R. Chapter XII, Subchapter B.

³⁴36 C.F.R. § 1220.34(a) does not specify at what level agencies must designate records officers.

officers, to ensure that the survey went to the appropriate contacts and that NARA understood those contacts' areas of responsibility. In addition, the second survey included numerous definitions and revisions that, according to officials, were intended to clarify the survey.

Another important limitation of the surveys as assessment tools is their reliance on unvalidated self-reported data. In the first survey NARA did little validation of agencies' self-reporting. According to NARA, its appraisal archivists³⁵ reviewed the information provided by the agencies, and their comments were incorporated into the analysis. However, according to the survey report, NARA otherwise "took agencies at their word and did not attempt to verify submissions." For the second self-assessment survey (conducted in May–June 2010), NARA asked respondents each to supply one item of documentation—the records management directive or directives issued by the department—as validation. According to officials, they expected to use these directives not only to validate certain responses, but also for analysis of features such as the age of the directives and extent they covered the requirements of the C.F.R. Officials also told us they are considering asking for additional documentation in future years, such as training curricula and internal evaluation reports. An official said that besides examining the directives, they validated answers for 5 of the 55 questions by comparing them with records schedule information that they track in-house.

As NARA continues to perform self-assessment surveys, it will be important for it to be assured that improvement (or deterioration) in governmentwide and agency scores reasonably reflect actual performance. Accordingly, validation of the results will be important both for the broad assessment of federal records management and for the assessment of individual agencies and programs. However, NARA has not yet developed plans to use other means of validating responses, such as doing followup interviews with respondents, requesting additional supporting documents, or including questions in the survey on how response data were collected. Without additional validation, confidence in the validity of the survey results may be reduced, and they may be less effective for their intended purposes.

³⁵ Appraisal archivists are members of NARA's records management staff who perform appraisals of agency records as part of the scheduling process. Because appraisal archivists are generally assigned to specific agencies, they may have insight into these agencies' records management programs.

NARA Has Shifted Efforts from Records Management Studies to Targeted Inspections, but Inspection Plans Are Limited and Still Under Development

According to NARA’s strategic records management plan,³⁶ the agency is to conduct records management studies to focus on cross-government issues, to identify and analyze best practices, and to develop governmentwide recommendations and guidance. For example, NARA planned to undertake such studies when it believed an agency or agencies in a specific line of business were using records management practices that could benefit the rest of a specific line of business or the federal government as a whole.³⁷

Since we last reported in 2008,³⁸ NARA has conducted three records management studies (see table 3).

Table 3: NARA Studies Performed or Planned Since 2008 GAO Report

Title or topic	Date	Comments
A Report on Flexible Schedule Implementation by Federal Agencies	2008	Results of a survey of nine federal agencies implementing flexible schedules to manage the disposition of their records.
Continuing Study of Federal Agency Recordkeeping Technologies	2008	Followup to a 2007 survey of five federal agencies implementing records management application (RMA) software to manage electronic records. The followup examined three additional agencies implementing RMAs and one agency implementing electronic archiving software for e-mail.
Agency use of Web 2.0 technologies	2010	How agencies are using Web 2.0 (blogs, wikis, social networking sites, and other collaborative Web-based technologies) and perceptions of the archival value of records so created.

Source: GAO summary of NARA information.

In accordance with its plans, all of these studies are focused on records management issues with wide application. In particular, flexible scheduling (the first study in table 3) is a relatively recent approach that allows so-called “big bucket” or large aggregation schedules (that is, a single schedule would cover all records relating to a work process, group of work processes, or a broad program area to which the same retention time would be applied). According to officials, NARA used the results of

³⁶NARA, *NARA’s Strategic Directions for Federal Records Management* (July 31, 2003).

³⁷NARA, *Strategic Directions: Inspections and Studies of Records Management in Federal Agencies* (October 2003).

³⁸In 2008 we reported that NARA had conducted or sponsored six records management studies since 2003 ([GAO-08-742](#)).

its study to update its original 2005 bulletin on this topic; the update was released in May 2010.³⁹ In contrast, the second study in table 3 (on recordkeeping technologies) was not used to feed into guidance, but to provide helpful information to agencies: in particular, on other agencies' experience with implementing records management software and, in one case, with e-mail archiving software being implemented at the Office of the Secretary of Defense.⁴⁰ The third study (on Web 2.0 use) was released in September 2010; according to NARA, the study enabled the agency to identify recommendations for future actions (such as clarifying the definition of a federal record and integrating records management into agency social media policy).

NARA recently shifted its efforts from performing studies to conducting inspections. From 2005 to 2008, NARA set objectives for and performed one or two records management studies in each fiscal year. For 2010 and 2011, NARA's objectives did not include performing studies, but instead it set an objective to perform one inspection in each year. According to NARA officials, at the time the 2011 plan was developed, they had not determined whether to conduct a study in that fiscal year or do additional inspections; since then, they have decided to do additional inspections.

NARA's plan to perform records management inspections in fiscal years 2010 and 2011 reflects a resumption of NARA's agency inspection program in response to our 2008 recommendation. NARA describes its new program of inspections as taking a "targeted" approach, focusing on particular aspects of records management at a given agency or agencies. (In contrast, its previous approach involved more comprehensive reviews of agency records programs.)⁴¹

To set up the inspection program, NARA took a number of steps: it revised its requirements, developed criteria for doing inspections, chose its first inspection targets, and has begun performing inspections. NARA added a new section of its regulations⁴² that defines the conditions under which it

³⁹NARA Bulletin 2010-03, *Flexible Scheduling* (May 3, 2010).

⁴⁰This system captures e-mail and makes it searchable, but it is not a records management system as it lacks required recordkeeping features.

⁴¹NARA had suspended this type of inspection in 2000, because, according to an agency official, it considered the process time-consuming, resource intensive, and difficult to implement.

⁴²36 C.F.R. Part 1239.

may undertake an inspection and how the inspection will be initiated and carried out with the agency. Under the final rule, published on October 2, 2009, “inspection” is defined as a formal review and report by NARA of an agency’s recordkeeping processes that focus on significant records management problems affecting records at risk that meet one or more of the following criteria: (1) they have a direct and high impact on legal rights or government accountability; (2) they are the subject of high-profile litigation, congressional attention, or widespread media coverage; (3) they have high research potential; or (4) they are permanent records with a large volume, regardless of format.

For fiscal year 2010, NARA chose to perform two inspections, both at the Department of Defense: an inspection at the Office of the Secretary of Defense (OSD) looking at three aspects of records management and one at the National Geospatial-Intelligence Agency (NGA). According to a NARA official, the inspection at the NGA, planned to begin in 2010, will not be completed until 2011. Table 4 describes these inspections.

Table 4: Inspections Performed or Planned

Inspected entity	Subject of inspection	Status
OSD	Executive Archives Project: Process for reviewing paper files of high-level officials, screening out temporary materials, and scanning records to facilitate access and retrieval. Main focus is to ensure that screening was appropriate and did not put permanent records at risk.	Performed 3rd quarter 2010
	Recordkeeping practices of the Under Secretary for Intelligence: Focus on whether records are covered by approved schedules and maintained to ensure effective retrieval and disposition.	Performed 3rd quarter 2010
	E-mail archiving system: Focus on recordkeeping copies of non-transitory e-mail and OSD’s planned disposition of e-mail messages in the system.	Performed 3rd quarter 2010
NGA	Transfer to NARA of finished mapping products (both hard copy and electronic), such as maps, nautical charts, and other materials, as well as related documents accumulated in the course of preparing maps (according to an agency official).	To be completed in fiscal year 2011 (according to an agency official)

Source: GAO analysis of NARA information.

At the time of our engagement, NARA had not issued planned reports on the results of the OSD inspections, and, according to an agency official, planning for the inspection at NGA was still in an early stage.

Resuming inspections is an important step, because inspections provide information in more detail on actual performance and particular records issues; however, the inspection program currently planned is limited. NARA’s plan commits to conducting one inspection per year for fiscal

years 2010 and 2011, and officials told us they were considering one or two inspections per year. According to one NARA official, NARA is unwilling to commit to more inspections because it has other priorities for the appraisal archivist staff, which also performs appraisals and scheduling, conducts studies, and works on the self-assessment survey and other special projects. (According to a NARA records management official, of the 100 staff of the National Records Management Program, approximately 50 are appraisal archivists, who work with about 245 agencies or components.)

NARA's planning for its inspection program is at a high level and is still under development. According to its 2009 methodology for self-assessments and inspections, NARA will develop a list of agency inspection targets based partially on the self-assessment results, develop inspection plans, and conduct inspections.⁴³ The plan identifies 20 conditions that the records management staff is to consider to help determine whether an agency may be an inspection candidate. (Examples include nonresponses to NARA's surveys, out-of-date agency records management manuals, requests from an agency head, and unresolved unauthorized destructions.) These are conditions that management is to assess in making inspection decisions—a checklist of risk factors to consider. According to agency officials, they expect to flesh out the inspection methodology as they gain experience doing their first targeted inspections in fiscal years 2010 and 2011.

However, the 2009 methodology does not define how NARA will systematically target and leverage a limited number of inspections to help achieve governmentwide results (one of its stated goals). For example, the agency has not yet described how it might distribute inspections among agencies or what topics it would like to cover over a period of years. Similarly, although NARA plans to perform multi-agency inspections, it has not yet developed plans to do so by, for example, defining key practices and determining how to inspect these at multiple sites. NARA's plan states that self-assessment and inspection activities will help NARA monitor how federal agencies manage their records, but it does not address how one or two inspections a year would provide effective monitoring or how it would best organize a limited number of inspections to accomplish this goal.

⁴³According to NARA officials, the choice of inspections for fiscal year 2010 (see table 4) was not based on the results of the first self-assessment, which became available in April 2010.

NARA activities alone cannot solve the persistent problems facing federal records management, since agency heads are responsible for their agencies' records and records management, as well as for allocating resources to these, and as we have pointed out in the past, records management has historically received low priority. Nonetheless, shedding light on the status of governmentwide records management can help focus both agencies and NARA on areas needing improvement and the need to devote resources to these areas. NARA's renewed inspection program has the potential not only to help motivate agencies to improve records management, but also to contribute to the systematic collection of comprehensive information for assessing progress. However, NARA's plans do not explain how it will systematically target and leverage a limited number of inspections to help achieve its goals. Until it has a more fully developed inspection methodology, NARA risks reducing the potential effectiveness of inspections for improving records management.

NARA Is Addressing the Problem of Unscheduled Records, but Faces Backlogs in Approving Schedules

NARA oversees retention and disposition of all federal records through records appraisal and approval of agency records schedules, processes that are crucial both to the management of records in agency custody and to the eventual preservation of permanent records in NARA's custody. NARA's authority to approve disposition schedules provides it with the ability to ensure that such schedules conform to its regulations.⁴⁴ NARA has identified unscheduled records as an important indicator of the risk of unauthorized destruction of records.

NARA has been making efforts to get agencies to schedule unscheduled records in computer systems. This project, which it refers to as the Electronic Records Project, was initiated in response to the requirements of the E-Government Act.⁴⁵ In December 2005 NARA issued a bulletin

⁴⁴This enforcement capability does not extend to how agencies implement the schedules in their day-to-day activities. Agencies control and are responsible for their records.

⁴⁵Section 207(e) of the E-Government Act of 2002 directs the Archivist to issue policies requiring agencies to adopt policies and procedures to ensure that records management requirements (chapters 21, 25, 27, 29, and 31 of title 44, U.S. Code) are applied effectively and comprehensively to government information on the Internet and to other electronic records. It also requires the Archivist to impose timetables for agencies to implement policies, procedures, and technologies.

requiring agencies by September 30, 2009,⁴⁶ to submit records schedules to NARA for all electronic systems of records existing as of December 17, 2005, and it has periodically requested agencies to provide summary reports documenting their progress.⁴⁷ After the 2009 deadline expired, NARA issued, in February 2010,⁴⁸ an additional bulletin reminding agencies of their continuing responsibility to schedule all their electronic records series and systems and requiring them to report semiannually on the status of their electronic records scheduling activities.

In fiscal year 2009, the number of schedules received jumped from 549 the previous year to 974, which NARA attributes to its efforts to hold agencies to the September 2009 deadline. Although this result is encouraging, it also led to an increase in NARA's backlog of schedules to be processed and approved. The number of schedules submitted increased by more than 400, while the number closed out increased by only about 100, from 402 to 501; as a result, the approval backlog increased from 575 to 1048. NARA's processing capacity reached a high of 501 schedules closed out in 2009, so the current backlog represents about 2 years' work for appraisal staff, assuming that they go on approving schedules at the current rate, and that no other schedules are submitted in the meantime.

NARA's schedule approval process occurs in four steps (see table 5) involving professional analysis and judgment, as well as input from the public.

⁴⁶NARA Bulletin 2006-02, *NARA Guidance for Implementing Section 207(e) of the E-Government Act of 2002*, dated December 15, 2005, formally established a governmentwide deadline of September 30, 2009, for agencies to submit records schedules to NARA for all their electronic records existing as of December 17, 2005. This requirement was reiterated in NARA Bulletin 2008-03 (Mar. 6, 2008).

⁴⁷NARA requested these reports in October 2008, April 2009, and August 2009.

⁴⁸NARA Bulletin 2010-02, *Continuing Agency Responsibilities for Scheduling Electronic Records* (Feb. 5, 2010).

Table 5: Review Process for Records Schedules

Step	Process
Schedule is received and initially checked	Schedule is assigned to an appraisal archivist for initial review. Schedules must include, for example, <ul style="list-style-type: none">• clear descriptions of the records at the series or system level and• clear and readily applicable cut-off and disposition instructions.
Schedule is reviewed for appropriateness	Appraisal archivists review schedules and often the records concerned to determine whether proposed disposition instructions are appropriate: <ul style="list-style-type: none">• Records proposed for permanent retention warrant preservation in the National Archives.• Files proposed for disposal lack historical or other research value.• Retention periods proposed for temporary records are long enough to protect the legal rights of the government and private parties.
Schedules are posted for public comment	NARA is required by law to publish notice in the <i>Federal Register</i> of schedules proposing <ul style="list-style-type: none">• the disposal of un-scheduled series of records or• a reduction in the retention period of a series already approved for disposal. Public comments may be submitted for 30 days. During this time, members of the public can request copies of schedules and appraisal reports; they then have 30 additional days to submit responses.
Issues are resolved	Issues may be raised by review of the schedule or the records it includes and by input from other NARA units or the public. Revisions may involve changes in the disposition of a series (from temporary to permanent or vice versa) or modifications in the retention period for a temporary series. After NARA and the agency resolve issues, the schedule is approved and sent to the agency for implementation.

Source: GAO analysis of NARA information.

NARA estimates that it generally takes approximately 6 months or less to process simple schedules for records that are clearly temporary and do not have legal rights implications, with almost 4 months of this time period taken by the public comment process. It may take up to a year for NARA to process large and complex schedules requiring closer review or eliciting critical public comments. According to NARA, the median time for it to approve a schedule has historically been about 300 calendar days.

NARA is trying to shorten its approval process and increase its capacity to process schedules despite limited resources. It has about 100 people working on records management, about half of whom work on appraisal and scheduling. The director of the Lifecycle Management Division (within Modern Records Programs) said the records management program aimed to increase approvals of records schedules covering electronic records by about 10 percent a year, and that staff are working on streamlining the scheduling process. For example, the program has reduced the time

allowed for public comment by 15 days, and staff are using e-mail rather than letters to communicate and send responses to requests from *Federal Register* requesters. The official also described future projects, including a project to improve the scheduling and appraisal workflow and a large project to revise the General Records Schedules, which should have the effect of reducing the number of schedules that agencies will have to submit, thereby improving NARA's ability to keep up with other submitted schedules.

Although these efforts may help to streamline the process, the number of records and systems that remain to be scheduled is likely very large. Currently, the Director of Lifecycle Management said that they are unable to estimate "the universe of electronic records," although they are confident that it is a "big number." For example, in 2006, NARA requested information from agencies on outstanding systems to be scheduled and received answers from 54 agencies, for a total of about 8,500 systems.

Other indications also support the conclusion that many records remain unscheduled. For example, NARA's electronic records summary report indicated that many electronic records were still unscheduled. As of September 30, 2009, based on 240 federal agencies and components:

- For 14 percent of agencies, schedules were submitted for 59 percent or fewer of their e-records (these were characterized as high risk).
- For 11 percent of agencies, schedules were submitted for 60 to 89 percent of their e-records (these were characterized as moderate risk).
- For 42 percent of agencies, schedules were submitted for 90 percent or more of their e-records (these were characterized as low risk).
- 33 percent of agencies did not submit reports.

Further, NARA's agency self-assessment indicated that 27 percent of agencies responding had scheduled fewer than half of their electronic systems. The survey did not ask for the numbers of systems remaining unscheduled; however, NARA's February 2010 bulletin requires agencies to list unscheduled systems. As agencies comply with this requirement, such lists should provide a basis for a better estimate.

NARA thus faces the risk that if its efforts to get agencies to submit schedules for outstanding agency systems continue to be successful, it will be unprepared to deal with the workload. The jump in its backlog associated with the 2009 deadline for scheduling electronic systems

suggests that this is a real concern. NARA has acknowledged that in light of the volume and complexity of electronic records increasing each year, keeping pace with the requirements to schedule all existing electronic records is a continuing challenge for both NARA and agencies.⁴⁹ However, it has not assessed the risk that it may be unable to keep up with schedules submitted, nor has it developed plans to mitigate that risk. Unless it does so, the risk increases that the backlog may increasingly hinder agencies' records management—for example, they may be required to retain records unnecessarily that they would otherwise be authorized to dispose of, and they may be delayed in transferring permanent records to NARA.

NARA's Ability to Preserve Federal Records Is Strained by Volume of Records, Finite Resources, and Technology

NARA faces challenges in preserving permanent records in its possession—both paper and electronic—largely because of the sheer volume of federal records, the finite resources available to deal with them, and the technological challenges posed by electronic records. NARA has a large and persistent backlog of records in paper and other media needing preservation actions. It has developed priorities for preserving physical records based on factors such as their demand and condition, but it does not foresee being able to accomplish those priorities. As a result, large numbers of physical records requiring preservation remain at risk. In addition, as we have previously reported, its development of the Electronic Records Archives is still ongoing, including the development of a preservation framework for electronic records. Until ERA and its electronic preservation capabilities are fully implemented, there is reduced assurance that NARA can ensure the preservation of all electronic records.

The Volume of Physical Records Needing Preservation Actions Has Led to Large Backlogs

According to NARA, preservation encompasses the activities that prolong the usable life of archival records. Preservation activities are designed to minimize the physical and chemical deterioration of records and to prevent the loss of informational content.⁵⁰ For physical records, an

⁴⁹NARA, *NARA's Electronic Records Project, Summary Report FY 2005–FY 2009* (June 15, 2010).

⁵⁰In contrast to preservation, conservation attempts to preserve records in their original format. Conservators examine records and assess their condition and the materials of which they are made. Conservators then recommend remedial treatments to arrest deterioration or to improve condition.

important part of preservation is holdings maintenance, defined as those preservation actions that are designed to prolong the useful life of records and to reduce or defer the need for laboratory treatment by improving the physical storage environment. These actions include replacing acidic storage materials such as file folders with materials of known quality that meet NARA specifications, improving shelving practices, removing damaging fasteners, and reproducing unstable materials such as Thermofax copies onto stable replacement materials. In addition, preservation may involve removing fragile records from use by capturing the information in a new format. NARA may duplicate motion picture film, still photos, microfilm, and sound and video recordings; reformat audio and video recordings that are in formats that cannot be used on currently available playback equipment; and generate digital images of records.

NARA's approach to preserving physical records and media (such as paper records, videotapes, microfilm, maps, charts, and artifacts) is to examine holdings to assess their preservation needs; provide storage conditions that retard deterioration; and treat, duplicate, or reformat records at high risk for loss or deterioration (for example, film and microfilm, audio recordings that require obsolete equipment, videos, brittle and damaged paper records, and motion pictures). Some of the factors influencing the rate at which NARA performs maintenance and preservation treatments, according to the agency, include large accessions of at-risk records, increased demand for the digitization of records, and high public interest.

The number of physical records requiring some degree of preservation activity has led to a backlog in preservation actions. In 2009, NARA reported that 65 percent⁵¹ of its archival holdings were in need of some preservation action.⁵² NARA defined "in need of preservation action" as that there was an imminent threat to the record, and the information it contained could not be accessed due to condition. According to NARA, it was conservative in this assessment, focusing on whether records could be safely served to researchers in their existing state and housing. For example, even though poor quality, chemically unstable boxes are not

⁵¹The baseline for this number was developed based on an extensive sample survey conducted in 2004–2005. Since the initial baseline was established, as new accessions are received, the numbers needing preservation are initially estimated based on a default value obtained from the survey; these estimated values are then adjusted as the records are actually inspected. As preservation actions are taken, the numbers are reduced.

⁵²2009 Performance and Accountability Report.

ideal for archival preservation, they would not be considered to require preservation action (that is, replacement); however, a box that did not adequately support the records would, since records that are not well supported are likely to be damaged.

NARA has set a strategic goal of reducing the backlog to 50 percent by 2016. However, there is little assurance the goal will be met. The 65 percent figure has remained almost constant since NARA established a baseline. In fiscal year 2009, NARA reported treating nearly 116,000 cubic feet of at-risk archival records. Nonetheless, as additional records were accessioned, the percentage of backlog remained essentially constant, and the actual amount of holdings requiring preservation action grew from about 2.4 million cubic feet in 2008 to about 2.6 million cubic feet in 2009. Further, in its 2008 preservation plan for nontextual holdings (maps, photos, audio, and video), NARA noted that 54,000 cubic feet of these records needed preservation actions, and that even addressing only the highest priority items (about 25 percent) exceeded its staff resource capabilities.

Over the past year, NARA increased the staff performing holdings maintenance (preservation activities such as rehousing at-risk materials) from about 8 to 18 dedicated staff (according to officials, some additional staff also devote part of their time to holdings maintenance). Nonetheless, there is little assurance that NARA will be able to meet its goal of reducing the backlog to 50 percent by 2016, and in any case, large numbers of permanent records will remain at risk for the foreseeable future.

Electronic Records Preservation Will Remain a Challenge

Preservation of electronic records presents significant challenges because these records are stored in specific formats and cannot be read without software and hardware—sometimes the specific types of hardware and software on which they were created. This hardware and software can vary not only by type but by generation of technology: the mainframe, the personal computer, and the Internet. Each generation of technology has brought in new systems and capabilities, and over time, hardware, software, storage media, and file formats become obsolete.

NARA is still developing the means to preserve permanent electronic records—the Electronic Records Archives. ERA achieved initial operational capability of the first two phases of the five-phase development, but the preservation component of the project is still being

developed. The former CIO told us that in her view, the preservation module would be the most difficult to implement of the system's functional areas.⁵³ This module is to enable secure and reliable storage of files in formats in which they were received, as well as creating backup copies for off-site storage.

Part of the preservation challenge is developing ways to ensure access to the most important formats, which NARA intends to do through various means, such as encouraging the use of sustainable formats and using viewers and transformation.⁵⁴ According to the conceptual framework for ERA preservation, NARA will encourage creating entities to transfer records to NARA using sustainable formats—that is, formats that are relatively resistant to obsolescence and can reasonably be expected to be usable for some period of time.⁵⁵ However, the framework recognizes that in many cases, this will not happen, and so ERA will need to ingest a broad range of formats. After files are ingested, the intent is to transform records as necessary into formats that are sustainable. Since transformation is the most expensive strategy for providing access to records, NARA plans to consider transforming electronic records only if the data file format is at risk of obsolescence, users require an enhanced level of access, or both. NARA expects to be able to preserve “all the bits” of electronic files that it acquires, but it will not be able to guarantee that all formats will be immediately or permanently accessible.

Further, we recently reported⁵⁶ that NARA planned to begin development of ERA's preservation framework in 2010 and complete it in 2011, but that the plan did not contain specific dates for completion or identify the associated capabilities that are to be delivered. As a result, we expressed doubt that the completed ERA system would be delivered by 2012 with the

⁵³Other functional areas include ingest, records management, archival storage, and dissemination.

⁵⁴NARA defines transformation as “reformatting or otherwise changing the way an electronic record is digitally encoded in order to reduce or eliminate dependencies on specific hardware or software, while preserving authenticity.”

⁵⁵According to NARA, characteristics of sustainable formats include generic or open formats, such as plain ASCII and XML, which do not require any particular hardware or software; formats with published or open documentation; and formats that are ubiquitous in the marketplace, like the Microsoft Office products or PDF files. Further, sustainable formats are self-describing, meaning that they have embedded within them the metadata necessary to interpret the records.

⁵⁶[GAO-10-657](#).

originally envisioned capabilities. Most recently, ERA has been listed by OMB as a high-priority project that has the potential for faster, smarter implementation.⁵⁷ Properly implementing our outstanding recommendations related to strengthening requirements management⁵⁸ and earned value management⁵⁹ could help the ERA project meet its performance goals within reasonable funding and time constraints. Until ERA and its preservation module are complete, it will remain uncertain whether NARA will be able to effectively preserve all permanent electronic records in such a way that the information is accessible.

In Key Management Areas, NARA Has Policies and Procedures that Are Consistent with Its Strategic Planning, although Gaps Remain

NARA's policies and procedures for key aspects of governance, human capital, and collaboration are generally aligned with its strategic planning, but selected areas have gaps. With regard to governance policies and procedures, NARA has defined and delegated areas of authority and responsibility that are generally aligned with its strategic plan, but it is not managing risk at the enterprise level. In addition, it has developed a strategic human capital plan that is consistent with our human capital strategic framework, but its implementation of the plan has been delayed, so that the agency is not yet managing human capital strategically. To its credit, NARA is taking advantage of numerous collaboration opportunities, which are generally aligned with the goals and strategies in its strategic plan. If NARA addresses the identified gaps in governance and human capital, it will be better positioned to achieve its goals.

⁵⁷Risk factors considered by OMB in listing projects included significant cost or schedule variance, performance targets or mission objectives have not been met, frequent rebaselines, and lack of essential executive sponsorship/leadership.

⁵⁸As mentioned earlier, we recommended in [GAO-10-657](#) that NARA ensure that ERA's requirements are managed using a disciplined process that ensures that requirements are traceable throughout the project's life cycle and are kept current.

⁵⁹Earned value management is a technique that integrates the technical, cost, and schedule parameters of a development contract and measures progress against them. We reported in [GAO-10-657](#) that NARA had partially implemented our recommendation: it had developed but not fully implemented an action plan to improve its earned value processes.

NARA Has Policies and Procedures Defining Key Aspects of Governance, but It Lacks an Enterprise Risk Management Capability

We have previously described governance as the process of providing leadership, direction, and accountability in fulfilling an organization’s mission, meeting objectives, and establishing clear lines of responsibility for results. Further, our prior work has established that enterprisewide risk assessment and management is a key part of governance.⁶⁰

NARA’s Lines of Responsibility Are Generally Aligned with Its Strategic Planning

Strategic planning and management can help agencies effectively manage resources and fulfill their missions, and, since the mid-1990s, we have reported on leading practices for effective strategic planning and management, including establishing long-term goals, identifying and developing strategies to address key management challenges, and aligning resources and activities to agency goals.

NARA has a strategic plan and a process for aligning its organization and lines of responsibility to support its goals. The agency’s recently updated strategic plan⁶¹ governs its activities until 2016 and details six strategic goals (see table 6) and 46 specific strategies it will use to achieve these goals.

Table 6: NARA’s Strategic Goals

Short title	Strategic goal
The nation’s record keeper	Ensure the continuity and effective operation of federal programs by expanding leadership and services in managing records.
Preserve and process	Preserve and process records to ensure access by the public as soon as legally possible.
Electronic records	Address the challenges of electronic records in government to ensure success in fulfilling NARA’s mission in the digital era.
Access	Provide prompt, easy, and secure access to holdings anywhere, anytime.
Civic literacy	Increase access to records in ways that further civic literacy in America through museum, public outreach, education, and grants programs.
Infrastructure	Equip NARA to meet the changing needs of customers.

Source: GAO analysis of NARA data.

⁶⁰GAO, *Legal Services Corporation: Some Progress Made in Addressing Governance and Accountability Weaknesses, but Challenges Remain*, GAO-10-194T (Washington, D.C.: Oct. 27, 2009).

⁶¹NARA, *Preserving the Past to Protect the Future: The Strategic Plan of the National Archives and Records Administration 2006–2016*, revised 2009.

Specific strategies support each of these goals. These strategies include, for example,

- “we will continue to make the business case at senior levels throughout the Federal Government that records and information are important Government assets and that records management is an important tool,”
- “we will ensure that all of our holdings are in appropriate space,”
- “we will identify permanently valuable electronic records wherever they are, capture them, and make them available in usable form as quickly as practical,” and
- “we will identify and implement the cultural changes that we need to better serve our customers in a changing environment.”

NARA has also established policies and procedures that define its organization and determine lines of authority and areas of responsibility. Responsibilities at the agency are approved by the Archivist through a defined process and are codified, along with the change process, in NARA Directive 101: NARA Organization and Delegation of Authority. For tasks that cut across organizational structures, NARA has procedures for setting up committees, task forces, and working groups, which are governed by charters establishing their goals and membership. It has a directive governing creation of these charters.

Generally, NARA’s organization and lines of responsibility were aligned with its strategic plan. Of 21 specific strategies that we examined, 17 were under clearly documented lines of authority and were assigned to appropriate offices by the agency’s policies, with 4 strategies lacking clearly documented lines of responsibility (see table 7).

Table 7: Strategies Lacking Clear Lines of Responsibility

Goal	Strategy
Address the challenges of electronic records in government to ensure success in fulfilling NARA's mission in the digital era.	Develop, implement, integrate, and manage an electronic records program, which is responsive to the needs of the Federal Government and our customers who expect continuing access to our Government's electronic records.
Equip NARA to meet the changing needs of customers.	Identify and implement the cultural changes that we need to better serve our customers in a changing environment.
	Increase staff productivity by improving our systems and processes.
	Involve employees in defining the best practices for their unit.

Source: GAO analysis of NARA data.

According to NARA officials, they did not consider that some of these strategies required specific assignments of responsibility, either because they were global responsibilities or because they were good business practices. However, clear statements of responsibility are important for implementing these strategies. We have previously reported that a dedicated implementation team assisted by supporting teams, such as functional or crosscutting teams, is a key practice in implementing cultural transformations.⁶² Assigning responsibility for these strategies to appropriate offices would help to provide assurance that they are appropriately carried out.

NARA Does Not Manage Enterprise Risk on a Continuous Basis

Enterprisewide risks are those that would threaten an organization's ability to carry out its mission, such as an act of terrorism, loss or compromise of critical information (such as classified or personally identifiable information), or a natural disaster. Risk management is the continuous process of assessing such risks, reducing the potential that an adverse event will occur, and putting steps in place to deal with any event that does occur. Without an effective program of risk assessment and internal control, management may have less assurance that it is using organizational resources effectively and efficiently, or that agency assets and operations are protected. As our previous work has shown,⁶³ and as

⁶²GAO, *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, GAO-03-669 (Washington, D.C.: July 2, 2003).

⁶³GAO, *Legal Services Corporation: Governance and Accountability Practices Need to Be Modernized and Strengthened*, GAO-07-993 (Washington, D.C.: Aug. 15, 2007).

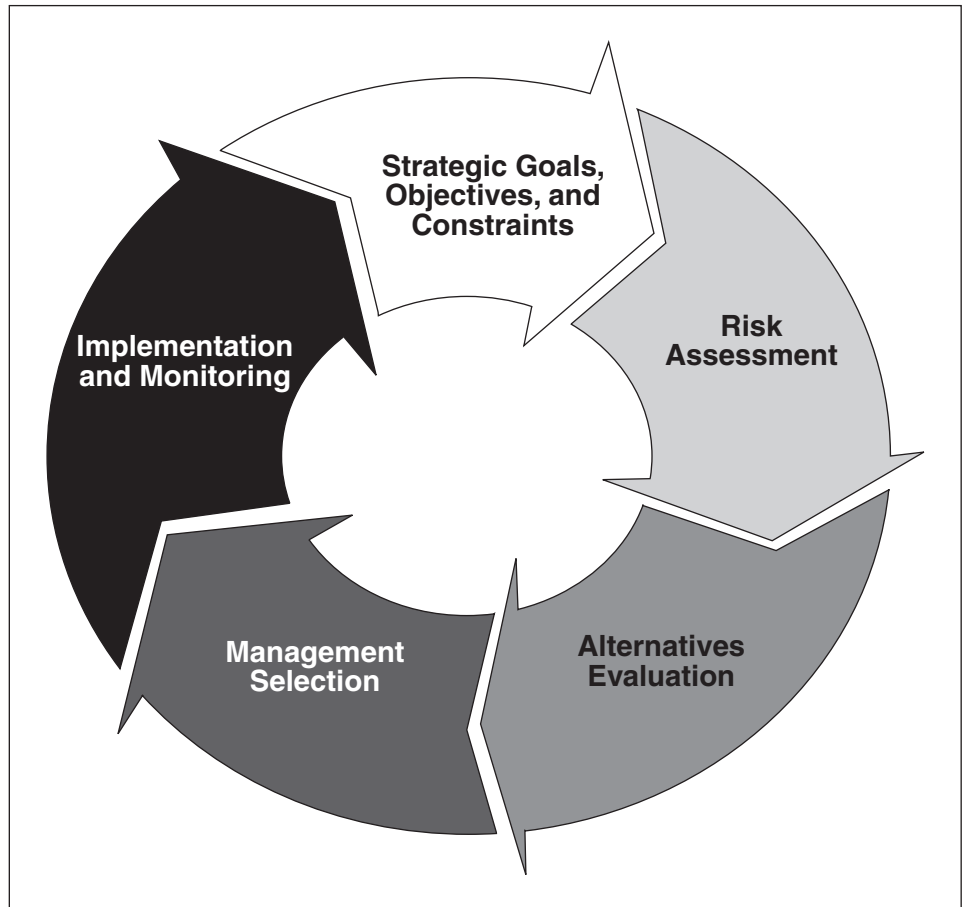
called for by the Standards for Internal Control in the Federal Government,⁶⁴ agencies should continuously and systematically monitor their internal and external environments to anticipate future challenges and avoid potential crises.⁶⁵

GAO has developed a framework for risk management (see figure 3) that identifies five major phases: (1) setting strategic goals and objectives, and determining constraints; (2) assessing the risks; (3) evaluating alternatives for addressing these risks; (4) selecting the appropriate alternatives; and (5) implementing the alternatives and monitoring the progress made and results achieved.

⁶⁴GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999) and *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996).

⁶⁵GAO, *Risk Management: Further Refinements Needed to Assess Risks and Prioritize Protective Measures at Ports and Other Critical Infrastructure*, [GAO-06-91](#) (Washington, D.C.: Dec. 15, 2005).

Figure 3: GAO Risk Management Framework



Source: GAO.

Our work has shown that decisions for enterprisewide risk management should be made in the context of an organization’s strategic plan, and organizations should have risk planning documents that address risk-related issues that are central to the organization’s mission.

According to NARA program officials, NARA currently performs risk management for the ERA project, its major system investment. The agency manages ERA’s risks using an agency-level risk review board, a program-level risk review board, and a technical risk review team. In addition, officials stated that the ERA program office produces monthly reports that include top identified risks and specify associated mitigation strategies. Risk status is communicated to senior NARA management and OMB on a

monthly basis and Congress on a quarterly basis. The project uses an automated tool to track and manage risk.

However, although NARA has identified important risks facing the agency, it currently has no dedicated active function to manage these risks at the enterprise level. Some risks of which NARA is aware include

- technological change causing record formats to become obsolete and unreadable,
- failure of the ERA project, and
- effects of climate change or natural disasters (such as on continuity of operation, preservation requirements, locations of facilities, and energy use).

According to NARA officials, the organization had a risk review board, which existed for about 2 years, but it became inactive. This occurred because the board's discussion of risk tended to focus either on project and program risks or highly generic risks.

NARA officials told us that the agency has also relied on a work group of senior executives, the Lifecycle Guidance Team, to address enterprisewide risks. However, as currently established, the Lifecycle Guidance Team does not explicitly focus on enterprise risk management. The members of this team, chaired by the Deputy Archivist, are members of NARA's senior staff.⁶⁶ However, although the team is at an appropriate level of seniority to address enterprise risk management, this function is not part of its charter. According to the charter, the group focuses on ensuring that NARA's records lifecycle initiatives are effectively coordinated, integrated, and implemented agencywide, and it provides leadership and oversight to initiatives to advance the agency's mission and strategic goals and improve records, information, and knowledge management governmentwide. Among the initiatives it is reviewing or has reviewed are systems in operation or in development, for which project risks have been discussed. However, these risks are not enterprise risks.

⁶⁶NARA senior staff who serve on the Lifecycle Guidance Team include the heads of Washington Records Services, Regional Records Services, Presidential Libraries, and Information Services.

According to NARA officials, the development of a new process and system for internal control has recently been proposed. The process and system, to be based on a similar system at the Library of Congress, are intended to automate internal controls and would include assessment and categorization of risk on the functional level. According to the officials, such an implementation would benefit NARA's risk management and internal control capabilities. This proposal has been reviewed by senior management, but is still in the first stages of planning and does not yet include a clear picture of which divisions will be responsible for dealing with strategic risks. At the time of our report, agency officials also acknowledged that NARA has neither completed a time frame for implementation nor established an estimated finish date.

Unless NARA begins to manage its enterprise risks on a continuous basis, there is a greater likelihood that serious threats to NARA may not be addressed.

NARA Is Addressing Human Capital Issues, but Implementation of Strategic Human Capital Management Is Only Beginning

The success of any organization depends on effectively leveraging people, processes, and tools to achieve defined outcomes and results. For people to be effectively leveraged, they must be treated as strategic assets. An agency's strategic human capital plan establishes an agencywide vision that guides workforce planning and investment activities.

As our previous work has shown, a strategic approach to human capital management enables an organization to be aware of and prepared for its current and future human capital needs, such as workforce size, knowledge, skills, and training. Sound human capital strategic planning provides the essential context for making sensible, fact-based choices about designing, implementing, and evaluating human capital approaches.⁶⁷ It is critical to ensuring that agencies have the talent and skill mix they need to address their current and emerging human capital challenges.⁶⁸

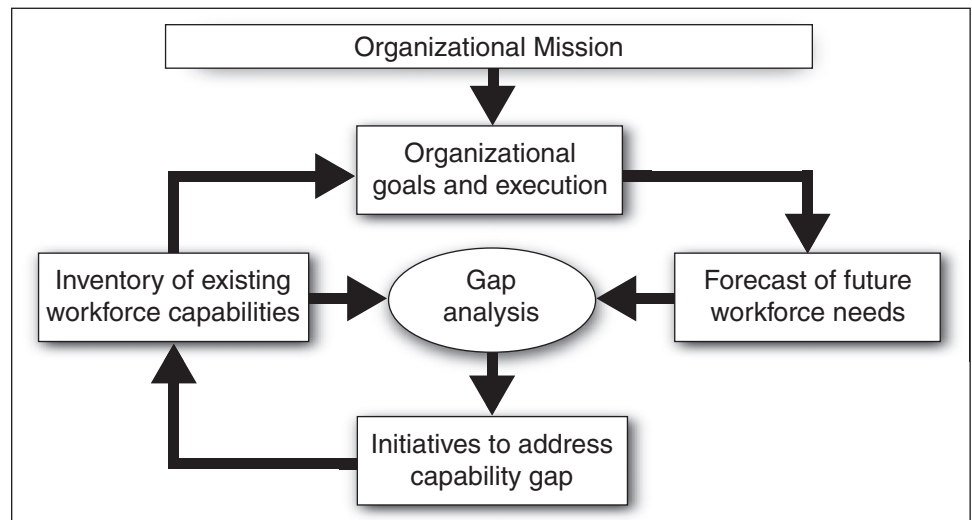
Our research shows that to be effective, a strategic approach should use data-driven methods to (1) assess the knowledge and skills needed;

⁶⁷GAO, *Human Capital: Taking Steps to Meet Current and Emerging Human Capital Challenges*, [GAO-01-965T](#) (Washington, D.C.: July 17, 2001).

⁶⁸GAO, *Human Capital: Sustained Attention to Strategic Human Capital Management Is Needed*, [GAO-09-632T](#) (Washington, D.C.: Apr. 22, 2009).

(2) inventory existing staff knowledge and skills; (3) forecast the knowledge and skills needed over time; (4) analyze the gaps in capabilities between the existing staff and future workforce needs, including consideration of evolving program and succession needs caused by turnover and retirement; and (5) formulate strategies for filling expected gaps, including training and additional hiring.⁶⁹ (Figure 4 is an overview of this process.)

Figure 4: Overview of Strategic Approach to Human Capital Management



Source: GAO.

In August 2009, NARA published its first Strategic Human Capital Plan, which covers fiscal years 2009 through 2014. Linked to the agency’s overall strategic plan, this strategic plan discusses strategies for achieving each of its five human capital goals: strategic alignment, leadership and knowledge management, results-oriented performance culture, talent management, and accountability.

The strategic plan includes a set of improvements that would give NARA the capability to strategically manage its human capital, as called for in our human capital framework. Specifically, section 3, “Workforce Planning,”

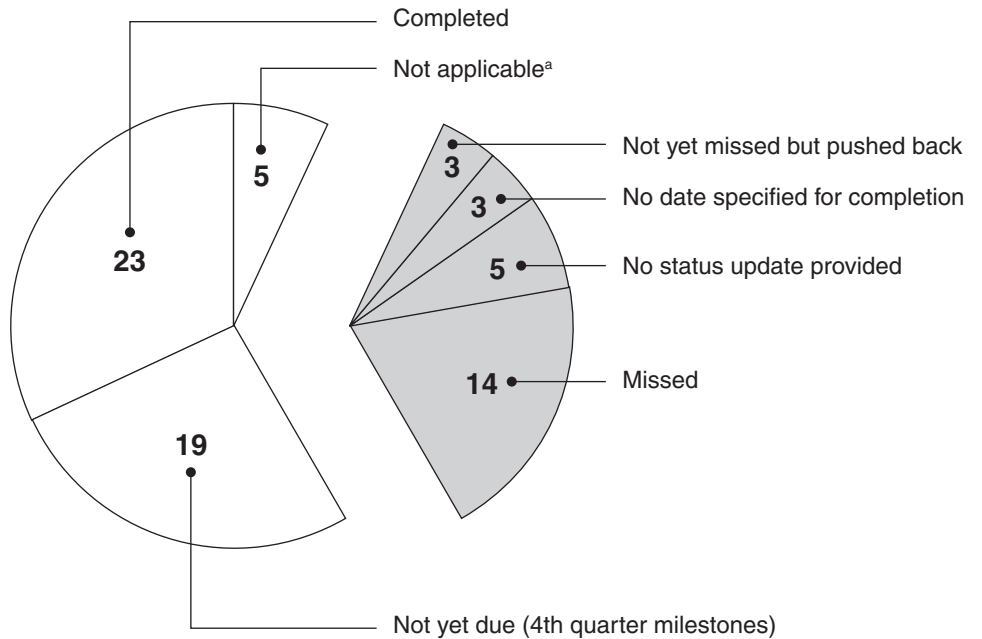
⁶⁹GAO, *Information Technology: FBI Has Largely Staffed Key Modernization Program, but Strategic Approach to Managing Program’s Human Capital Is Needed*, [GAO-07-19](#) (Washington, D.C.: Oct. 16, 2006).

includes all five of the elements of our strategic human capital framework. The plan also includes related goals, such as being able to hire people faster by automating manual and paper-based processes; NARA's Director of Human Resources cited this as one of the agency's highest priorities.

The agency has taken some initial steps to implement its plan. For example, it has completed a pilot of a competency development approach in which it modeled the competencies required for all positions in the Modern Records Program and in the Information Security Oversight Office; it is currently assessing the accuracy and effectiveness of the competency models developed under the pilot. Modeling competencies—determining the skills needed for specific positions—is a key tool for determining what skills NARA will need to meet organizational goals. Once competency modeling is completed, NARA will be in a position to forecast future workforce skills needs. It is also currently finalizing guidance for workforce planning, another part of the process of forecasting future workforce needs. Finally, it has completed a pilot for an online training needs assessment tool. The results are currently being analyzed, and a report is tentatively scheduled for September.

However, NARA is falling behind in the implementation of its human capital management milestones. For fiscal year 2010, NARA set 72 milestones for implementing the strategic plan. However, as of the end of the third quarter, 23 milestones had been met, 14 were missed, 3 future milestones were pushed further back, and 8 had other weaknesses, such as lacking a specific date or status update. Of the remaining 24, some are not due yet, and some were periodic actions with no single due date (see figure 5). An example of a missed milestone specifically related to our strategic human capital framework is the development of an agencywide workforce plan that includes a hiring projections worksheet. In addition, NARA has not completed an inventory of existing workforce skills. Without a complete skills needs forecast and a current skills inventory, it cannot perform a gap analysis and consequently cannot plan future human capital initiatives, three of the steps of our strategic human capital framework.

Figure 5: Status of Human Capital Strategic Plan Milestones



Source: GAO analysis.

^aMonthly and quarterly tasks with multiple milestones.

The agency’s human capital officials stated that milestones had been missed or pushed back because they had to address other priorities, including realigning staff to address the requirement to comply with the Office of Personnel Management’s (OPM) 2009 Hiring Reform and the May 2010 Presidential Hiring Reform Initiatives.

To its credit, in responding to these initiatives, NARA is making progress on addressing its hiring process. Hiring is an important part of strategic human capital management, since hiring is a critical tool for addressing skills gaps. According to NARA, as of September 2009, it had an overall average time to fill a position of 163 to 213 days. In contrast, the model set up by OPM called for an 80-day hiring process. Responding to OPM’s 2009 Hiring Reform,⁷⁰ NARA’s Hiring Process Action Plan (submitted to OPM in

⁷⁰OPM’s 2009 Hiring Reform required agencies to identify barriers to timely and effective hiring by September 2009 and develop action plans for addressing these barriers by December 2009.

December 2009) identified primary barriers to a timely and effective hiring process. According to the plan, an important barrier was the agency's paper-based application process, including manual routing of forms. During NARA's hiring process, its staff manually printed, reviewed, and annotated hundreds of applications at several stages in order to verify and screen applications. The agency also experienced a 45 to 90 day backlog of hiring actions, which NARA officials attributed largely to reliance on paper-based hiring systems. NARA determined that without an automated staffing system to screen applications, addressing the other barriers identified in its action plan would have only a marginal impact on its overall time to fill a position.

To address this barrier, NARA piloted and implemented automated hiring software, called USA Staffing, provided by OPM. This Web-based system automates the recruitment, assessment, referral, and notification processes,⁷¹ reducing the degree of human intervention required in the hiring process. According to NARA, the agency implemented the USA Staffing tool in May 2010, and as of July 2010, it reported reducing the average time-to-hire to 126.5 days. Agency human capital officials told us they believed further reductions were likely as the staff becomes more familiar with the new tool.

NARA continues to work on its hiring process in response to the May 2010 Presidential Hiring Reform Initiative, which set a deadline of November 1, 2010, for federal agencies to adopt certain streamlined hiring procedures, including eliminating knowledge, skills, and abilities (KSA) essays, allowing applicants to apply using resumes and cover letters, and involving the managers and supervisors responsible for hiring in the complete hiring process.

Agency human capital officials believe that these improvements will result in a more efficient hiring process. However, the reforms under the Presidential Initiative are still ongoing. Further, because the adoption of the new staffing system is still recent, it is not possible to fully evaluate its impact.

⁷¹USA Staffing automatically generates vacancy announcements; posts vacancy announcements on USAJOBS; accepts applications via Internet, phone, or fax; analyzes applicant competencies and qualifications; rates and ranks job applicants; covers all available hiring flexibilities; produces and updates certificates; notifies applicants; manages applicant records; and meets all regulatory requirements and can be adapted for agency-specific procedures.

In addition, for the hiring process to be fully effective, it is important that NARA implement its strategic human capital plan and particularly that it complete its skills needs analysis and gap analysis. Such analyses are crucial for effectively determining hiring needs; they are also important for helping determine how to allocate personnel to mission areas in which NARA has identified resource-related backlogs, such as records management and preservation. Until NARA completes these analyses, there is no assurance that the agency will be able to manage its human capital strategically, ensuring that it has staff with the right competencies to perform its mission now and in the future.

NARA Engages in Collaborative Efforts That Further Strategic Goals

As a small agency with a broad mission, NARA has stressed the importance of collaborative efforts in achieving the organization's goals. In his preface to the agency's strategic plan, the Archivist refers to the importance of involvement with the archival and records management communities as well as other stakeholders, stating that partnerships at all levels of the organization will add depth and richness to NARA's programs and initiatives. The strategic plan itself emphasizes collaboration and partnering. It spells out six strategic goals, for each of which the plan describes a number of specific strategies. For five of the six goals in the strategic plan, either one or two of the specific strategies are directly related to collaboration and partnership; table 8 shows the specific strategies associated with each strategic goal.

Table 8: NARA's Strategic Goals and Collaboration Strategies

Short title	Strategic goal	Specific strategies related to collaboration and partnership
The nation's record keeper	Ensure the continuity and effective operation of federal programs by expanding leadership and services in managing records.	Work with industry and academic experts to develop automated records management solutions.
Preserve and process	Preserve and process records to ensure access by the public as soon as legally possible.	(No specific collaboration strategy.)
Electronic records	Address the challenges of electronic records in government to ensure success in fulfilling NARA's mission in the digital era.	Partner with agencies, research institutions, and private industry to develop, implement, manage, and promote NARA's electronic records program.
Access	Provide prompt, easy, and secure access to holdings anywhere, anytime.	Partner with both governmental and private institutions to facilitate the availability of NARA holdings over the Internet, while ensuring that NARA obtains ownership of the digital versions.

Short title	Strategic goal	Specific strategies related to collaboration and partnership
Civic literacy	Increase access to records in ways that further civic literacy in America through museum, public outreach, education, and grants programs.	Partner with industry, national and international institutions, and affiliated archives to develop cooperative initiatives that showcase NARA holdings, promote civic and historical literacy, and highlight the importance of records.
Infrastructure	Equip NARA to meet the changing needs of customers.	Expand partnerships with the professional communities who share NARA's goals and mission. Continue to partner with the private foundations that support the National Archives and the presidential libraries to increase customers and produce quality products and services of interest to the public.

Source: GAO analysis of NARA data.

NARA has established or begun to establish collaborative efforts that are generally aligned with all these goals and strategies. For example, for the third strategic goal, which focuses specifically on electronic records, the specific strategy related to collaboration is to partner with agencies, research institutions, and private industry to develop, implement, manage, and promote NARA's electronic records program. According to its workplan, multiple efforts in this area are planned to be managed by NARA's Center for Advanced Systems and Technologies (NCAST) within the Office of Information Services. NCAST serves as lead for collaborating in information technology research and development with governmentwide, interagency, professional, and academic organizations. Among other things, NCAST is to organize, sponsor, and participate in research in computer science, archival science, and related technologies capable of improving the lifecycle management of records.

In support of this responsibility, NCAST has both planned and completed collaborative research agreements with partners that include federal organizations and consortia, industry, and academia, including the National Science Foundation. For example, NCAST has worked with the Records Management Services Working Group of the Object Management Group (OMG), an international, open membership, not-for-profit standards-setting consortium of the computer industry and other information technology organizations, on the creation of new software specifications for records management.⁷² The working group identified

⁷²The Records Management Services effort aims to implement functional requirements previously developed for records management services components to be included in the Federal Enterprise Architecture component repository.

and documented key requirements for records management functionality in systems that manage electronic records. NCAST is also a member of the Networking and Information Technology Research and Development Subcommittee of the National Science and Technology Council's Committee on Technology.⁷³ This organization is a collaborative effort of more than a dozen federal research and development agencies that fund research in advanced information technologies such as computing, networking, and software.

Examples of other collaboration efforts related to this strategy include two other groups. One of these is the NARA-chaired Advisory Committee on the Electronic Records Archives. According to its charter, this committee brings together experts from many different fields to make recommendations to the Archivist on development of ERA, and its membership includes experts from private organizations with an interest in records management, members of academia, researchers, and state officials with responsibility for electronic records. NARA also established the Federal Records Council to provide advice and support from other federal agencies to the Archivist on all aspects of records management, with special emphasis on the management of electronic records. Membership on the council, as stated in its charter, includes representatives from OMB and GSA, officials from cabinet-level departments, and representatives from communities such as science, intelligence, and the federal court system. Several other organizations outside of these groups have also sent members to Federal Records Council meetings. Members are departmental records officers and officials from other divisions with records management responsibilities, such as information technology, information security and privacy, and Web content. According to its charter, the council contributes strategic advice and support to the Archivist in issuing records management guidance, and provides a mechanism for agencies to work together to identify strategies and best practices for electronic information and records issues.

In one instance (the second strategic goal, involving the accessioning and processing of records), NARA did not set a specific strategy related to collaboration. However, in discussing this goal, the strategic plan refers to seeking out and developing partnerships to assist in improving work processes to deal with a backlog of holdings that had been accessioned, or

⁷³The National Science and Technology Council is part of Office of Science and Technology Policy in the Executive Office of the President.

legally transferred to NARA's possession, but not yet processed. (Processing involves such steps as flagging records based on classification, providing enhanced descriptions of the content of the records, and making records available to the public.) In support of this goal, NARA has established, for example, a working agreement with a private company through which the company would provide metadata for digitized NARA information according to the agency's standards. According to an official, having these metadata would provide the agency with more information about the content of the records, which assists in their processing.

Table 9 summarizes NARA's collaborative efforts related to its strategic goals and provides examples.

Table 9: Collaborative Efforts Related to NARA's Strategic Goals

Strategic goal short title	Strategy	Effort	Examples
The nation's record keeper	Work with industry and academic experts to develop automated records management solutions.	Begun	For this recently established goal (2009), NARA is beginning to explore approaches to automatic classification of records by type, but no collaborative partners have yet been identified.
Preserve and process	(No specific collaboration strategy.)	Established	In an agreement with a private company, NARA receives metadata for digitized data.
Electronic records	Partner with agencies, research institutions, and private industry to develop, implement, manage, and promote NARA's electronic records program.	Established	NARA chairs the Federal Records Council, which gives strategic advice to the Archivist on issuing guidance and best practices for electronic information and records issues.
Access	Establish partnerships to facilitate the availability of NARA holdings over the Internet.	Established	By agreements with Internet companies such as Facebook and YouTube, NARA provides information to the public in diverse formats.
Civic literacy	Partner with industry, national and international institutions, and affiliated archives to develop cooperative initiatives that showcase NARA holdings, promote civic and historical literacy, and highlight the importance of records.	Established	<p>NARA partners include</p> <ul style="list-style-type: none"> • National History Day, a nonprofit education organization that provides programs to engage middle and high school students in the study of history and • Federal Geographic Data Committee, a federal interagency committee that promotes the coordinated development, use, sharing, and dissemination of geospatial data.

Strategic goal short title	Strategy	Effort	Examples
Infrastructure	Expand partnerships with the professional communities who share NARA's goals and mission.	Established	Under a cooperative agreement with the Council of State Archives, NARA has developed such projects as templates for records-related emergency preparedness and marketing campaigns on the importance of records.
	Continue to partner with the private foundations that support the National Archives and the presidential libraries to increase customers and produce quality products and services of interest to the public.	Established	NARA has an agreement with the Foundation for the National Archives to assist in providing monetary support for NARA's programs and activities.

Source: GAO analysis of NARA data.

NARA's Open Government Plan describes further collaborative initiatives in addition to these. Issued in response to the Open Government Directive,⁷⁴ NARA's Open Government Plan describes its efforts aimed at increasing transparency, participation, and collaboration in government. Among these is a collaboration with the Department of Justice on the development of a dashboard that would provide information on agencies' performance in fulfilling Freedom of Information Act requests. Another is collaborating with academic law and policy groups, such as the Legal Information Institute at Cornell University and the Center for Innovative Technology Policy at Princeton University.

Furthermore, in accordance with the open government principles of transparency, participation, and collaboration, NARA has established new collaborative efforts with the public. For example, according to its Open Government Plan, NARA used Ideascale, a commercial collaboration platform, to gather perspectives from the public on the content of the plan. It has also established blogs and a wiki to further collaboration both with the public and other agencies. Its NARAtions blog⁷⁵ and its Our Archives wiki⁷⁶ are addressed to the public and research community that uses its archival holdings, both providing information and soliciting input. Its

⁷⁴OMB, *Open Government Directive*, M-10-06 (Dec. 8, 2009).

⁷⁵blogs.archives.gov/online-public-access.

⁷⁶www.ourarchives.wikispaces.net.

Records Express blog⁷⁷ shares information and solicits comment from the federal records management community.

Conclusions

NARA has taken steps to expand its oversight activities and improve their effectiveness. Although it cannot by itself ensure that agencies are managing records appropriately (agencies control and are responsible for their own records), NARA can use its oversight activities to help determine where records management improvements are most needed and improve its ability to influence agencies to give more priority to records management programs. This will require that it continue to build and improve its oversight activities, including studies, surveys, inspections, and reporting. As NARA continues to refine its approach to oversight, it will be important for it to consider how to validate self-assessment data (for example, by doing followup interviews) and how to strategically plan inspections to maximize their value as oversight tools, by, for example, defining key practices and inspecting these at multiple sites. Further, it will also be important going forward for NARA to assess the risk that its capacity to process and approve schedules may not be sufficient to meet the demand.

As an agency with a broad mission, NARA faces numerous challenges, for which its strengths in seeking collaborative opportunities should be helpful. Further, NARA's organizational responsibilities are generally aligned with its strategic plan, and it has developed a human capital strategic plan that, if implemented effectively, would give NARA the capability to strategically manage its human capital, as called for in our strategic human capital framework. However, there are opportunities for improvement. For a few specific strategies, NARA has not yet established clear lines and assignments of responsibility. In addition, the lack of adequate enterprisewide risk management leaves the agency vulnerable to a variety of risks that may not be foreseen or mitigated. Further, until NARA has implemented the capability to manage its human capital strategically, the risk remains that it will not have the staff with the skills needed to meet present and future mission needs.

⁷⁷blogs.archives.gov/records-express.

Recommendations for Executive Action

To help NARA improve its management and oversight capabilities, we are recommending that the Archivist of the United States take the following six actions:

- To help ensure that its future assessments of the status of governmentwide and agency records management are accurate, develop additional means to validate the self-reported data in its surveys.
- To ensure that its inspections program helps provide a comprehensive view of federal records management and greater impetus for agency improvement, develop a plan, with milestones, that provides for systematically and strategically targeting inspections to maximize their value as oversight tools.
- To help ensure that it can manage the backlog in the scheduling process, assess the risk that it will be unable to keep up with schedules submitted and develop plans to mitigate that risk, if indicated.
- To ensure that its organization and governance reflect its strategic goals and strategies, ensure that all the specific strategies in its strategic plan have clear lines and assignments of responsibility.
- To ensure that NARA's senior staff and decision makers can appropriately and quickly assess threats and vulnerabilities stemming from enterprise risks, develop and assign responsibility and resources for an enterprisewide risk management capability that allows it to monitor its internal and external environments continuously and systematically.
- To ensure that it has the appropriate skills and staff to meet present and future needs, give priority to completing its skills, needs, and gap analyses and developing a plan to fill those gaps.

Agency Comments and Our Evaluation

We received written comments on a draft of this report from the Archivist of the United States. In these comments (reproduced in appendix II), NARA concurred with the six recommendations in the report. The Archivist stated that to address them, NARA plans to (1) develop and implement additional means to validate self-reported data from self-assessment surveys in fiscal year 2011, (2) develop a plan for systematically and strategically targeting inspections to maximize their value, (3) conduct a study of the risks associated with the backlog in its records scheduling process, and develop mitigation plans, (4) review the current strategic plan to make sure it can tie strategies to specific actions

and targets, (5) roll out an enterprisewide internal controls program that uses risk assessment as an integral part of managing and monitoring internal controls, and (6) consider using an existing contract to draw in additional resources to assist NARA with completing its competency modeling initiative.

The agency also supplied technical comments, which we have incorporated as appropriate in the final report.

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies of the report to interested congressional committees, the Archivist of the United States, and other interested parties. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have questions about this report, please contact me at (202) 512-6304 or melvinv@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix III.

Sincerely,



Valerie C. Melvin
Director, Information Management
and Human Capital Issues

Appendix I: Objectives, Scope, and Methodology

Our objectives were to (1) assess the National Archives and Records Administration's (NARA) effectiveness in overseeing the governmentwide management of records, including commenting on its capacity to identify risk of unlawful destruction of federal records; (2) describe its ability to preserve permanent records; and (3) assess its policies, procedures, and plans supporting key management and oversight capabilities: governance, human capital, and collaboration.

For all of our objectives, we reviewed NARA documentation of its records management and preservation activities, interviewed agency officials, and reviewed prior reports by us and others.

We reached out to the federal records management community to obtain information on several issues. We obtained views of selected federal government records managers by contacting records officials at several components of the Department of Defense (DOD) and through an online survey of members of the Federal Information and Records Managers Council (FIRM), an organization of federal records managers.

We also convened a panel of experts to obtain information about records management challenges and best practices and NARA's oversight of federal records management programs. We worked with the National Academy of Sciences to choose a diverse group of panel members. The method for this was an iterative discussion with representatives of the Computer Science and Telecommunications Board at the National Academy of Sciences to determine which experts had expertise in areas most applicable to our objectives. The final panel included several former NARA employees, representatives of federal agencies that deal directly with NARA, and records management experts from the private sector and academia. The panel also included an expert in electronic records management, as well as one from the Smithsonian, the mission of which is similar to NARA's in terms of records preservation.

To assess NARA's effectiveness in overseeing governmentwide records management we examined its use of the activities defined in 44 C.F.R. 29: surveys, studies, inspections, and reporting. We obtained input from the expert panel, from records managers at DOD, and from our survey of FIRM members. We also examined NARA's process for approving records schedules and compared the numbers of schedules it has approved in recent years with estimates of the numbers of outstanding records series and systems. To comment on NARA's capacity to identify risk of unlawful destruction of federal records, we reviewed applicable laws, reviewed the

results of the agency self-assessment survey, and met with NARA records management staff to identify risk factors.

To describe NARA's ability to preserve permanent records, we met with NARA preservation staff and obtained input from the expert panel. We reviewed and assessed the reliability of NARA's survey of its preservation needs and its backlog, and we analyzed its ability to process its backlog. To assess NARA's ability to preserve electronic records, we reviewed external research and standards related to electronic records issues, interviewed staff involved in development of the Electronic Records Archives (ERA), and drew on our previous reports about the status of the ERA development process.

To assess its policies, procedures, and plans supporting key management and oversight capabilities (governance, human capital, and collaboration), we did the following:

- We assessed NARA documents relating to governance, including strategic planning and policy documents, against requirements of the Government Performance and Results Act (GPRA) and our risk management framework. To assess whether NARA organization and performance measures were aligned with its strategic plans, we examined NARA's directive that assigns responsibilities, as well as charters of temporary task forces, to determine whether lines of responsibility were clearly delineated for specific strategies in the strategic plan.¹ We compared NARA's risk management activities against GPRA requirements and our risk management framework.
- We evaluated NARA's human capital management capabilities and its Human Capital Strategic Plan against our strategic human capital framework.² We interviewed the Director, Human Resources Services Division, and the Director, Staff Development Services, and other officials. To assess NARA's progress in implementing needed strategic human capital capabilities, we reviewed progress in implementing its Strategic Human Capital Plan against the plan's milestones. We also analyzed NARA's hiring process against Office of Personnel Management criteria,

¹We looked at 21 specific strategies, excluding others that were not within the scope of our engagement.

²GAO, *A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002).

and examined the effects of reported recent improvements in the hiring process.

- We evaluated NARA’s collaboration capabilities by interviewing policy and planning staff, and analyzing agency policies and procedures related to collaboration. We obtained a list of NARA collaborative projects and examined whether collaborative activities specified in the strategic plan were being carried out.

We conducted this performance audit from October 2009 to October 2010 in the Washington, D.C., metropolitan area in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the National Archives and Records Administration



Via messenger

September 27, 2010

Valerie C. Melvin
Director, Information Management and Human Capital Issues
United States Government Accountability Office
44 G Street, NW
Washington, DC 20548

Dear Ms. Melvin,

Thank you for the opportunity to review and comment on the draft report entitled *National Archives and Records Administration: Oversight and Management Improvements Initiated, but More Action Needed*. We are pleased to note the positive recognition of our efforts to date in several oversight and management areas. We also agree that more action is needed, and concur with the six recommendations in this report.

Many changes are underway at NARA, including a staff reorganization that will help us more effectively address the challenges we face. I believe strongly in the talent we have at NARA and I know that the report recommendations are achievable. The following outlines the report's recommendations and the actions we will take to address them. We will provide semi-annual updates on our progress.

(1) To help ensure that its future assessments of the status of government-wide and agency records management are accurate, (the Archivist) should develop additional means to validate the self-reported data in its surveys.

NARA will develop and implement additional means to validate self-reported data from self-assessment surveys in FY 2011. Each year, during the first and second quarters, NARA will re-evaluate its validation approaches and methodologies, implementing changes as needed to improve the efficacy and usefulness of the results for NARA and the agencies.

(2) To ensure that its inspections program helps provide a comprehensive view of Federal records management and a greater impetus for agency improvement, (the Archivist) should develop a plan with milestones, that provides for systematically and strategically targeting inspections to maximize their value as oversight tools.

In our response to GAO-08-742, *FEDERAL RECORDS: National Archives and Selected Agencies Need to Strengthen E-mail Management*, we stated that the results of our annual

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Federal records management self-assessments will help inform both studies and inspections. In FY 2011 NARA will develop a plan for how to develop annual targeted inspections that includes this concept and others as appropriate. We will pilot the approach prior to implementation in FY 2013. In the meantime, NARA will continue to conduct the inspections that were started or will start in FY 2011.

- (3) To help ensure that it can manage the backlog in the scheduling process; (the Archivist) should assess the risk that it will be unable to keep up with schedules submitted and develop plans to mitigate that risk, if indicated.

NARA will conduct a study of the risks associated with this backlog and develop mitigation plans. The study will be completed by the end of the 2nd quarter, FY 2012.

- (4) To ensure that its organization and governance reflect its strategic goals and strategies, (the Archivist) should ensure that all the specific strategies in its strategic plan have clear lines and assignments of responsibility.

We will review the current strategic plan for ownership of specific strategies. While most have owners, a few do not. For the majority of strategies that do have owners, it is probably a good idea to remind owners and ask them to make sure we can tie these strategies to specific actions and targets currently or soon to be underway.

- (5) To ensure that NARA's senior staff and decision makers can appropriately and quickly assess threats and vulnerabilities stemming from enterprise wide risks, (the Archivist) should develop and assign responsibility and resources for an enterprise wide risk management capability that allows it to monitor its internal and external environments continuously and systematically.

As part of the reorganization proposed by our Transformation Task Force, internal controls and risk management are being given more prominence and credibility in a Performance and Accountability staff office. Through this office, we will continue our work to roll out an enterprise-wide internal controls program that ensures responsibility and accountability for NARA's lines of business, and uses risk assessment as an integral part of managing and monitoring internal controls. We believe this work will embed an awareness of risk factors throughout the organization as part of an ongoing, repetitive process. I will assign a NARA Risk Officer to manage this process, and who will raise risks identified to our Leadership Guidance Team (LGT) or similar executive leadership group. As envisioned in OMB Circular A-123, this executive body will participate in assessing and monitoring internal control deficiencies and will be involved in identifying and ensuring correction of systemic weaknesses.

- (6) To ensure that it has the appropriate skills and staff to meet present and future needs, (the Archivist) should give priority to completing its skills, needs, and gap analyses and developing a plan to fill those gaps.

Earlier this year, I directed the formation of an Archivist's Task Force on Agency Transformation to look at possible improvements to the agency. One of the improvements recommended by the task force was the creation of a separate Human Capital Office directed

2

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by a Chief Human Capital Officer (CHCO) position that would report directly to the Archivist and the Deputy Archivist on human capital matters. This office will bring together all of NARA's human capital programs and activities under one umbrella, allowing NARA to take a comprehensive and cohesive approach to human capital management throughout the agency. The CHCO will be an integral part of the Executive Leadership Team.

As noted in the audit report, NARA has had to divert staff resources from implementing certain strategic human capital initiatives to respond to new mandates from the Office of Personnel Management (OPM), such as the OPM 2009 Hiring Reform and the May 2010 Presidential Hiring Reform Initiative. While the result of diverting these staff resources has led to improvements in hiring as noted in the report (specifically the reduction in the average time to fill a position from 163 days to 126.5 days), we believe that these new mandates will continue to require additional staff time as we work towards the OPM goal of 80 days to fill a position. As such, we will consider using an existing contract to draw in additional resources to assist NARA with completing our competency modeling initiative so that we can move forward with performing the gap analyses to plan future human capital needs.

If you have questions regarding this information, please contact Mary Drak by email at mary.drak@nara.gov or by phone at 301-837-1668.



David S. Ferriero
Archivist of the United States

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Valerie C. Melvin, (202) 512-6304 or melvinv@gao.gov

Staff Acknowledgments

In addition to the contact named above, key contributors to this report were Barbara Collier (Assistant Director), Shaun Byrnes, Kami Corbett, Neil Doherty, Rebecca Eyler, Jason Kirwan, Lee McCracken, Glenn Spiegel, and Walter Vance.

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