



# 2013 RECORDS MANAGEMENT

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## SELF-ASSESSMENT REPORT

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

NATIONAL ARCHIVES *and* RECORDS ADMINISTRATION

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## EXECUTIVE SUMMARY

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The National Archives and Records Administration (NARA) annual mandatory Records Management Self-Assessment (RMSA) marked its fifth year in 2013. This year we aligned the RMSA reporting period with other recordkeeping reporting requirements in the *Managing Government Records Directive* (M-12-18).<sup>1</sup> NARA issued the RMSA to Federal agencies in October 2013. The deadline to respond was January 31, 2014.

NARA conducts self-assessments, as well as inspections and evaluations, in our capacity as the oversight entity for Federal records management. The goal of the self-assessments is to determine whether agencies are compliant with statutory and regulatory records management requirements. Self-assessments are intended to provide agencies with information they can use to measure their compliance and to target their resources on areas that need improvement.

Ninety-six percent of agencies completed this year's assessment. We received responses from all Cabinet-level department records officers, most departmental components, and most independent agencies.

Over the past five years we have seen some fluctuation in the scoring and related risk categories.

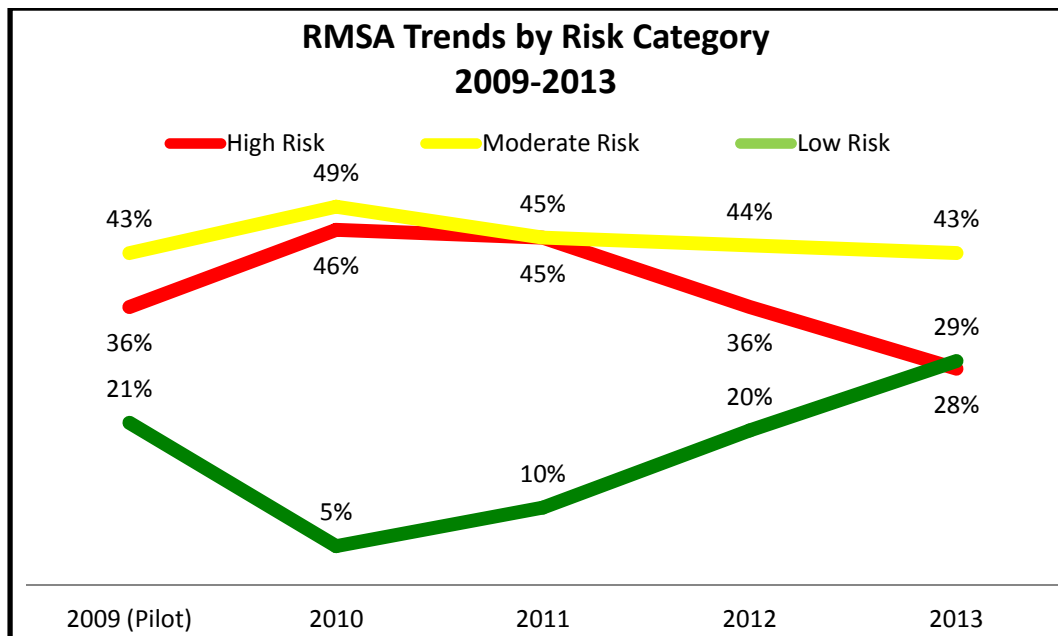


Figure 1

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

There was a drop in scores the second year of the self-assessment, which we attributed in part to us making fairly significant changes to the 2009 pilot questionnaire. Such changes made comparisons of scores between initial years difficult. Subsequently, we stabilized and refined the scoring process, which gave us better ability to identify trends. Since 2010, the trend has been a gradual improvement in RMSA scores, and this trend continues in the 2013 self-assessment.

As in previous RMSAs, we scored selected questions and assigned each agency a total score that placed them in a low, moderate, or high risk category. This year, in terms of risk, agencies break down as follows: 29% low risk, 43% moderate risk, and 28% high risk. Not only does this represent an increase in the number of agencies that scored in the low risk category, it marks the first time the number of agencies in low risk exceeds the number in the high risk. Low, moderate, and high risk rankings described in this report are only one indicator of an agency's compliance with Federal records management regulations and policies.

This is the first RMSA to be conducted since the initial stages of implementation of M-12-18. M-12-18 provides a framework of requirements and initiatives to modernize records management policies and practices. Specifically M-12-18 has generated<sup>2</sup>:

- The Capstone<sup>3</sup> approach to managing email
- Senior Agency Official for Records Management (SAO) involvement and oversight of agency records management programs
- Updated guidance for transferring permanent records in electronic format to NARA
- Engagement with NARA's stakeholders to develop suitable approaches for the automated management of email, social media, and other types of digital record content
- The development of two records management community of interest groups
- Work toward developing a Federal records management maturity model

In further support of these initiatives, the Office of Management and Budget and the National Archives issued Memorandum M-14-16: *Guidance on Managing Email* to heads of agencies on September 15, 2014. M-14-16 reinforces the importance for each agency to manage their email properly and the need for all Federal employees to be aware of their responsibilities for managing email records. This memorandum includes NARA's most recent guidance on managing email, NARA Bulletin 2014-06.<sup>4</sup>

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<sup>2</sup> See *Records Express Blog*, <http://blogs.archives.gov/records-express/>, for more detailed information on M-12-18 initiatives.

<sup>3</sup> Capstone offers agencies the option of using a more simplified and automated approach to managing email, as opposed to using either print and file systems or records management applications that require staff to file email records individually. Using this approach, an agency can categorize and schedule email based on the work and/or position of the email account owner. The Capstone approach allows for the capture of records that should be preserved as permanent from the accounts of officials at or near the top of an agency or an organizational subcomponent. An agency may designate email accounts of additional employees as Capstone when they are in positions that are likely to create or receive permanent email records.

<sup>4</sup> See *Records Express Blog*, <http://blogs.archives.gov/records-express/>, for more detailed information on M-14-16 and NARA Bulletin 2014-06

The discussion on email included in Section IV Electronic Records Management of this report was based on data gathered prior to the release of M-14-16. We anticipate being able to report more in-depth data on agency email practices related to M-14-16 in subsequent RMSA reports.

## **Findings**

Many of our findings and recommendations have remained the same over the years and are included in Appendix I of this report. A few key findings are:

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

## **Recommendations**

Engagement at senior levels within each agency is essential to improving records management. The following recommendations are directed at the SAOs to improve records management (RM) programs and to meet the requirements of M-12-18.

- SAOs must take the responsibility to ensure that all parts of their agency understand the importance of effective records and information management in meeting mission needs.
- SAOs must ensure compliance with records management regulations and policies throughout the organization.
- SAOs must ensure that their agency dedicates the resources required to meet the broader M-12-18 goals and ensure that their Agency Records Officer and general records and information staff members have the support needed to carry out their responsibilities.

Based on our analysis of the RMSA data, we make the following recommendations for agency records management programs:

- Agencies should continue to pursue technological solutions to electronic recordkeeping and engage in efforts by NARA and other oversight activities to meet the goals of M-12-18 in this area.
- Agencies need to establish well-defined and meaningful performance goals and performance measures for their major records management program activities based on regulations and best practices.
- Agencies must develop internal controls that provide reasonable assurance that their programs comply with all Federal records management laws and regulations.
- Agencies need to develop plans and initiatives to transition to a digital government as directed by M-12-18.

## **Conclusion**

We recognize that there is still more to be achieved in improving Federal records management. Technological advances continue to increase the volume of information, and the desire of the public to access this information quickly, digitally, and with confidence. It is imperative that NARA and the Federal records management community continue to work together to ensure this access to information happens. In order to do so, it is essential to identify areas of concern and discover solutions. Individual and collective results of the RMSA, although just one compliance-centered metric, continue to help raise the profile of records management and contribute to improved preservation and access to government information.

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# FY 2013 RECORDS MANAGEMENT SELF-ASSESSMENT

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## *INTRODUCTION*

### **Background**

The Records Management Self-Assessment (RMSA), conducted annually since 2009, is an annual requirement for Federal agencies subject to the Federal Records Act (44 United States Code (U.S.C.) Chapter 31).<sup>5</sup> The National Archives and Records Administration (NARA) designed the RMSA as an analytical tool for agencies to assess their programs against Federal records management statutes, regulations, and other requirements. NARA also uses data from the assessment to measure agency compliance with Federal records management statutes and regulations as well as to compare Federal records management programs to one another. Over the past five years, NARA has used RMSA data to identify common risks and challenges to records management (RM) programs and to target our policy, guidance, assistance, oversight, and other efforts accordingly.

There continues to be gradual improvement in RMSA scores, which reflects an increasing understanding within agencies of the importance of recordkeeping requirements. The increase in the number of agencies achieving RMSA scores in the moderate and low risk categories, while gradual, indicates a degree of success by agency respondents and NARA in making adjustments and changes to the way Federal records are created, maintained, and accessed. It is clear that many agencies are using their results on the RMSA to identify and prioritize areas of improvement.

### **Authority**

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

### **Methodology**

The methodology used this year is consistent with previous RMSAs in that agencies responded to a questionnaire that contains scored and non-scored questions on RM practices. There is a set of “core” questions covering essential elements of a compliant Federal records management program. The standard set of core questions, established for the 2011 RMSA, was used with minor changes for the 2012 and 2013 RMSAs.

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<sup>5</sup> Some agencies not subject to the Federal Records Act participate voluntarily.

The first three years of the RMSA (2009-2011) had special focus questions that were scored. As the survey evolved, we realized that scoring these questions, as they changed every year, made it difficult for agencies to measure their year over year progress. We stopped scoring special focus questions in 2012, which allows for a better one-to-one comparison between years.

The questionnaire (provided as Appendix III) was first sent to 267 agencies in Word and PDF formats in order to allow agencies time to gather information. That was followed by an online survey tool with a unique link for each of the agencies. We received 255 responses, representing a 96% response rate. Four out of the eleven non-responding agencies were permanently removed from the list of potential respondents by the parent Department because the information is being reported by another larger component. The remaining seven non-respondents are listed in Appendix VI.

### **Validation process**

We made some changes to the validation process this year in an effort to increase the accuracy of our understanding and interpretation of the data. We validated 37 questions on the self-assessment using one of various methods: validation interviews by telephone of randomly selected agencies that answered 'Yes' on core questions; follow-up communications with agencies that answered 'Not applicable' if additional explanation was necessary; analysis of agency responses that indicated the transfer of permanent electronic records to NARA in FY 2013; and tracking the inventories of permanent and unscheduled records agencies were required to submit under the *Managing Government Records Directive* (M-12-18).<sup>6</sup>

In previous RMSAs, we asked for documentation from agencies that supported affirmative answers to select core questions. We then examined those documents based on prescribed criteria and made a determination as to whether they validated a given affirmative answer. While we found this method useful, it was limited because it allowed for no conversation between the agencies and those at NARA analyzing the documentation. This year we conducted interviews with a random sample of agencies to verify their 'Yes' responses to a total of eight questions. This provided us with more in-depth information and a confidence that the questions were being understood and appropriately answered.

We have long recognized that there are times when a 'Yes' or 'No' response to a question is not sufficient, and so we added a 'Not-applicable' option that had to be supported with a follow-up explanation. As part of the validation process, we verified these explanations and awarded points accordingly. For example, we asked agencies if they are transferring permanent records to the National Archives according to an approved retention schedule as required by regulations. While this appears to be a straight forward 'Yes' or 'No' question, there are instances when the 'Not-applicable' option is more accurate, such as if an agency is too young to have permanent records eligible for transfer.

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<sup>6</sup> M-12-18.

The NARA units responsible for handling transfers of permanent records track records received as well as monitor all disposition authorities (retention schedules) with permanent records and which agencies should have records eligible for transfer in a given year with two tracking systems. Using the Accessions Management Information System (AMIS) and the Comprehensive Accounting for Scheduled Permanent Electronic Records (CASPER) tracking system, we were able to validate responses to three questions related to the transfer of permanent electronic records to NARA. We verified that we received records from those agencies that indicated they had transferred permanent records within the last fiscal year. We also verified that those agencies that indicated they had no permanent records eligible for transfer indeed had no eligible records, and that those agencies that indicated they had no permanent records had no permanent authorities.

We also asked agencies to send us their inventories of permanent and unscheduled records required by M-12-18. We took into consideration the amount of work agencies were doing to create the inventories; therefore, we did not request any additional documents. Tracking the incoming M-12-18 spreadsheets validated the 'Yes' responses to RMSA questions 61a and 62a.

### **Scoring**

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

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

Maximum Point Values (per section)

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

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

The risk categories are:

Low Risk: Scores 90 - 100

Moderate Risk: Scores 60 - 89

High Risk: Scores 0 - 59

# FY 2013 RECORDS MANAGEMENT SELF-ASSESSMENT

## GENERAL RESULTS

### Comparison with previous year

This year 29% of agencies scored in the low risk category, 43% in the moderate risk, and 28% in the high risk. Last year (2012), the risk category breakdown was 20% low risk, 44% moderate risk, 36% high risk. In other words, the current assessment shows a 9% increase in agencies in the low risk category and 8% decrease in agencies in the high risk category. Overall, 72% of all respondents this year received a 'passing score,' meaning they fell within either the low risk or moderate risk categories. Looking back as far as 2010, when only 5% of agencies scored in the low risk category and 46% in the high risk category, the improvement is notable. Some in the moderate category are closer to high risk than low risk.

The areas where agencies need to improve have not changed significantly from previous RMSAs. Many of our findings have remained consistent over the past three to five years. There is still cause for concern, particularly in the areas of electronic records management. Modest improvements in the scores for Section Four: Records Management Program - Electronic Records indicate some agencies are making concerted efforts to handle records and information electronically. However, the advances in technology, how quickly technology changes, and the increase in volume of data still present challenges.

### Steady improvement

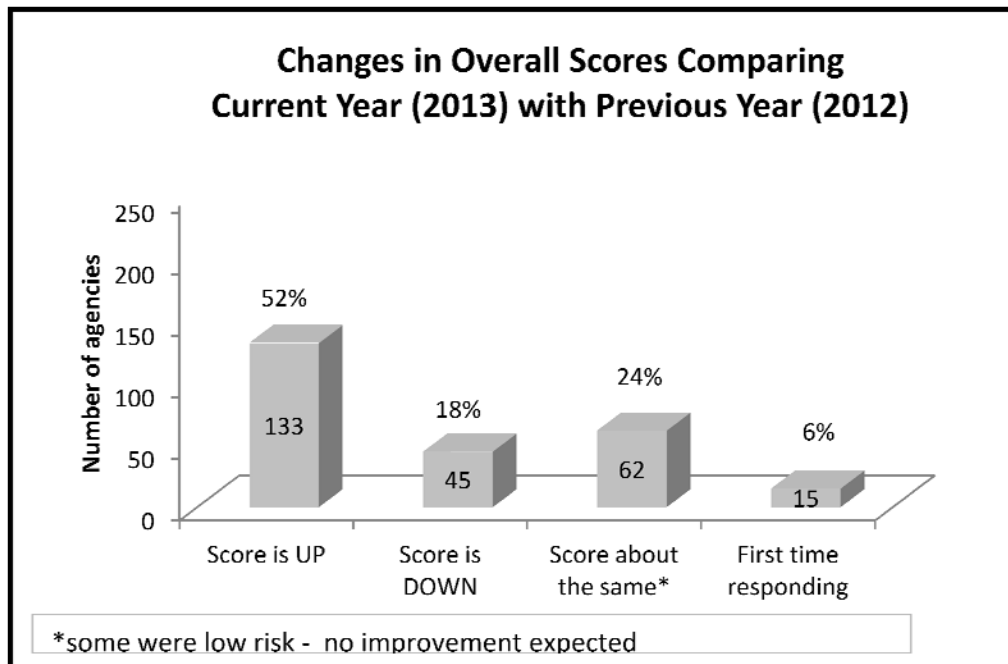


Figure 2

While results for individual agencies vary, there has been a gradual improvement in RMSA scores overall with 133 agencies showing improved scores over last year. There are several factors. First, we have made changes over the years to the RMSA based on feedback from the respondents as described in the validation process of this report. More importantly, however, the RMSA is being used by agencies to assess and make targeted improvements. Agencies tell us that their RMSA scores enable them to focus resources on specific areas for improved practices where needed. This is its intended purpose.

M-12-18 provides a framework of requirements and initiatives to modernize records management policies and practices. The RMSA fits into this framework as one of the methods NARA uses to measure records management program compliance and assess risks to government information. There are a variety of initiatives, some specifically generated by M-12-18, that NARA has to improve records management including<sup>7</sup>:

- Guidance on an optional approach to managing email records called the Capstone approach
- Working with private industry and other stakeholders to produce economically viable automated records management solutions
- Updated format guidance for permanent records
- Informative topics at Bimonthly Records and Information Discussion Group (BRIDG) meetings with opportunities for agencies to meet with appraisal staff
- Webinars that have been attended widely at a time when in-person training is harder for agencies to afford in lean budget times
- Working closely with the Federal Records Council, Council of Chief Information Officers, and the Federal Records Officer Network (FRON)
- Exploring and stimulating automated approaches for managing digital record content (including email and social media)
- Identifying solutions and requirements for cloud-based records management and storage
- Increased oversight activities including records management program inspections and reviews

A more complete list is included as Appendix II of this report.

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<sup>7</sup> See *Records Express Blog*, <http://blogs.archives.gov/records-express/>, for more detailed information on M-12-18 initiatives.

## **Role of the Senior Agency Official**

The establishment of a Senior Agency Official for Records Management (SAO) within each agency, as required by M-12-18, is elevating the importance of records management within agencies. While SAO engagement is just getting started, we anticipate the more SAOs get involved with records and information management the trend towards better records management will continue to be reflected by improved RMSA scores.

In the 2012 RMSA report we made three recommendations directed at the SAOs. These were:

- SAOs must take the responsibility to ensure that all parts of their agency understand the importance of effective records and information management in meeting mission needs.
- SAOs must ensure compliance with records management regulations and policies throughout the organization.
- SAOs must ensure that their agency deploys the resources required to meet the broader M-12-18 goals and ensure that their Agency Records Officer and general records and information staff members have the support needed to carry out their responsibilities.

In RMSA validation interviews and elsewhere, we are seeing that some agencies are beginning to take these recommendations and the role of the SAO seriously and, as a result, the profile of records management in their agencies is being elevated. This can only help improve how Federal records and information are managed.

## **Smaller agencies tend to score lower**

RMSA respondents differ in many ways, but one particularly important difference is in their size as determined by the number of full-time equivalent employees (FTE). We ask agencies to select which size category they fit into ranging from very small (1-99 FTE) to super large (500,000 or more FTE). As stated earlier, the overall percentage of respondents in the low risk category is 29%; however, only 18% of very small agencies and very small components of departments are low risk. Isolating just the very small and small independent agencies, we find them to be markedly underrepresented in the low risk category. Only 1 out of 24 very small independent agencies (1-99 FTE) and only 4 out of 25 small independent agencies (100-999 FTE) fall into the low risk category.

<b>Agency Size Category<sup>8</sup></b>	<b>Total Agencies</b>	<b>Percentage in Low Risk</b>	<b>Percentage in Moderate Risk</b>	<b>Percentage in High Risk</b>
Very Small (1-99 FTE)	38	18%	47%	34%
Small (100-999 FTE)	73	27%	38%	34%
Medium (1,000 – 9,999 FTE)	73	34%	51%	15%
Large (10,000 - 99,999 FTE)	48	38%	35%	27%
Very Large (100, 000 - 499,999 FTE)	7	0%	71%	29%
Super Large (500,000 or more FTEs)	4	75%	25%	0%
Info not available	12	8%	25%	67%
<b>Regardless of size</b>				
Cabinet	167	35%	44%	20%
Independent	83	17%	39%	45%
Executive Office of the President	5	20%	60%	20%

### **General conclusions by section**

Each year we look at the four sections of the RMSA individually in order to determine where agencies may need additional guidance. This year, as in previous years, agencies tend to score well in Section One: Records Management Program-Activities and Section Three: Records Management Program-Records Disposition. Section Two: Records Management Program-Oversight and Compliance and Section Four: Records Management Program – Electronic Records Management remain the areas that need the most attention.

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<sup>8</sup> Size categories stem from 2010 statistics used by Office of Personnel Management, FedScope and the Department of Justice. The RMSA has been using these categories since 2011.

# FY 2013 RECORDS MANAGEMENT SELF-ASSESSMENT

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## *VALIDATION PROCESS RESULTS*

NARA validates the answers to the RMSA to get a sense of the accuracy of agency responses and to understand how agencies are interpreting the questions. This year, for the first time, we conducted validation interviews with a group of randomly selected respondents.

### **Part I: Agency interviews**

The RMSA team conducted follow-up interviews via telephone with a group of randomly selected agencies to verify their ‘Yes’ responses to eight questions related to electronic records, internal controls, and performance goals.<sup>9</sup> These interviews revealed that many agencies still do not understand certain electronic records concepts, often equating reliability, authenticity, integrity, and usability of agency electronic records with retention and disposition requirements. The lack of understanding of electronic records concepts is not new; we have seen this in previous RMSAs if not necessarily with these specific questions.

The concept of an internal control is new to some records managers and consequently misunderstood. Despite the fact that the RMSA contained a definition of internal controls, a list of examples, and specific instructions to exclude records schedules and policies, agencies continue to cite schedules and policies, such as agency directives, as internal controls. Also, agencies continue to cite Federal Records Center disposal notices as an internal control, despite the fact that the RMSA instructed agencies that information from external agencies, such as NARA, could not be considered.

### **Part II: Explanations for ‘Not applicable’ responses**

For the first time, a ‘Not applicable’ choice was added to several questions on the RMSA, allowing agencies to receive points for questions not relevant to their program.<sup>10</sup> The RMSA team reviewed the explanations for all ‘Not applicable’ responses to assess whether agencies selected the option appropriately. Points were awarded to agencies only when we concurred with the choice. The RMSA team followed up on ‘Not applicable’ answers if there was a question regarding the explanation. ‘Not applicable’ answers usually involved special circumstances for very small agencies and those agencies that have not been in existence very long.

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<sup>9</sup> Questions: 11, 13, 15, 18, 39, 42, 46, and 48.

<sup>10</sup> Questions: 5, 6, 8, 11, 13, 15, 18, 21, 25, 31, 35, 36, 39, 42, 44, 46, 48, 49, and 59.



### **Part III: Permanent records transfers to NARA**

This year NARA's custodial units conducted an analysis of the responses to three questions focused on the transfer of permanent electronic records to NARA using FY 2013 accession data tracked in AMIS and permanent records disposition authorities data captured in CASPER. They found that agencies did not always correctly indicate whether they had permanent electronic records, and whether they had transferred permanent electronic records to NARA. They also found that some agencies that answered that they had no records eligible for transfer to NARA in FY 2013 may have records eligible under authorities that they are not aware of or are not utilizing properly.

### **Part IV: Receipt of M-12-18 spreadsheets for identifying permanent and unscheduled records**

While the validation process this year was mostly based on oral interviews with respondents and research conducted by NARA of its own data, there was some document production related to the requirements of M-12-18, which the RMSA team used to validate a few of the answers on the self-assessment. In response to M-12-18 Part I, Section 2, Requirement 2.2 - the identification of permanent records 30 years old or older and Requirement 2.5 - the identification of unscheduled records, Federal agencies were required to submit spreadsheets to NARA. Questions 61 and 62 of the RMSA asked if these spreadsheets had been submitted. These spreadsheets also validate other inventory-related questions (28, 32, 36, and 37).

# SECTION ONE: RECORDS MANAGEMENT PROGRAM

## ACTIVITIES

This section focuses on major records management program areas including organizational structure, policy directives, and training. Seven out of ten questions are scored with a total of 21 possible points. Overall, agencies tend to score well in this section.

This year agencies continue to improve in some program activities while remaining relatively stable in others. The size of an agency appears to have an effect on an agency's overall score within the section. Very small agencies (those consisting of fewer than 100 FTE) tend to score lower than their larger counterparts.

### Trends

The number of agencies scoring in the low risk category in this section increased almost 10% from last year. The number of agencies scoring in the moderate risk category decreased 7%, and the number of agencies scoring in the high risk category decreased by approximately 3%. The positive trend in this section suggests that agencies are becoming more aware of the importance of having a person who is responsible for coordinating and overseeing the implementation of the records management program; having a records management directive that is updated regularly; and having a network of designated employees who are assigned records management responsibilities.

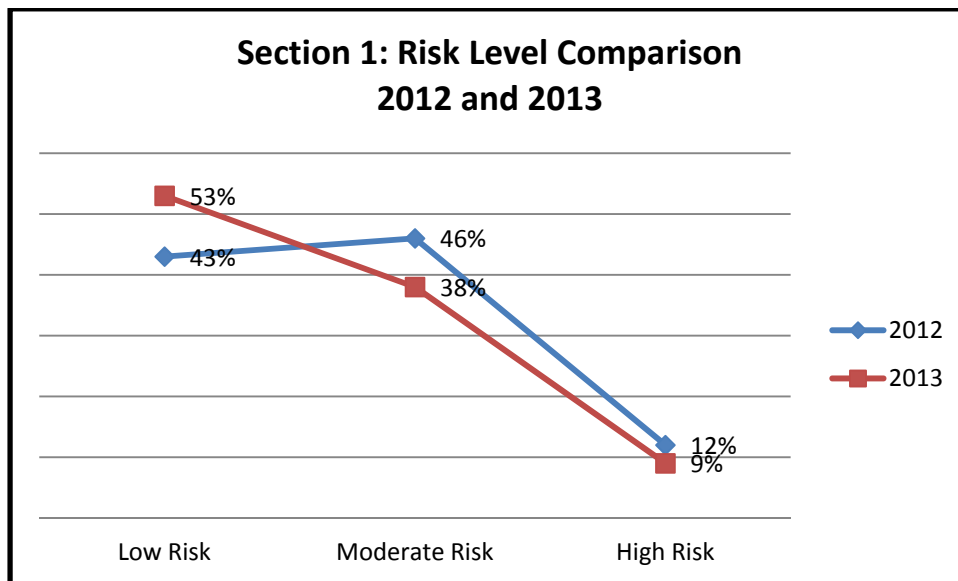


Figure 3

The most significant of these trends is in the number of agencies reviewing and/or revising records management policies and directives annually or biannually than previously reported. Agencies indicating that they have revised their directive within the last fiscal year increased 9% over last year and 23% since 2011. Maintaining updated policies is essential to ensure that they reflect changes in agency mission or business needs and include all new records management policy issuances and guidance distributed by NARA.

### **Records management training**

A recommendation made in last year's RMSA report encouraged agencies to develop agency-specific records management training for employees at all levels of the organization. As the 2013 data shows, there still is a greater percentage of agencies offering internal records management training for *employees assigned records management responsibilities* (84%) than of agencies offering formal training for all *agency employees and contractors* (74%). The percentage of agencies responding favorably to the RM training questions was up overall from last year with an 8% increase in those offering training to those assigned RM responsibilities and a 6% increase in those offering RM training to all staff. However, these percentages have remained relatively consistent over the past five years.

The percentage of agencies requiring that all senior and appointed officials, including those incoming and newly promoted, receive records management training increased 6% from last year (2012 – 63%, 2013 – 69%); however, this percentage has remained relatively steady over the past five years.

### **Small and very small agencies**

In 2013, as in previous years, there were a number of RMSA respondents who noted that their answers had to be considered in light of their status as a very small agency. Comparably fewer very small agencies (42%) scored in the low risk category of this section than did larger agencies (58%). The 'Not applicable' option for some questions in this section may have prevented very small agencies from being penalized on individual questions; however, for this section of the RMSA, it did not appear to help their overall scores.

### **Findings**

- The results for this section have not changed significantly from previous RMSAs.
- A high percentage of agencies designate an Agency Records Officer and establish a network of Records Liaison Officers (RLOs).
- The percentage of agencies that update their directives annually has increased 10% over last year and 23% over 2011.
- There is an increase in records management training for senior staff; however, this number is still under 70%, indicating that nearly a third of senior staff receive no such training.

## SECTION TWO: RECORDS MANAGEMENT PROGRAM

### *OVERSIGHT AND COMPLIANCE*

This section looks at how agencies monitor and assess the activities of their records management programs. 44 U.S.C. Chapter 31 and 36 CFR 1220.30(c)(1) require agencies to establish effective controls over the creation, maintenance, and disposition of records in all formats. OMB Circular A-123 requires agencies to develop and implement appropriate, cost-effective management controls for their programs and operations. Questions in this section focus on whether agencies have established internal controls as well as performance goals and measures. Additional questions relate to agencies conducting internal assessments, evaluations, and audits to ensure that records management programs are in compliance with Federal records management statutes and regulations as well as with internal policies, procedures, and directives. Eleven of the fifteen questions in this section are scored for a total of 31 possible points.

#### **Trends**

The number of agencies scoring in the low risk category in this section increased almost 8% from last year. The number of agencies scoring in the moderate risk category increased 9%, and the number of agencies scoring in the high risk category remained about the same. There was a slight increase in the number of agencies that report having established internal controls and performance goals. Increasingly agencies are reporting that they conduct evaluations and/or audits to investigate how well records management policies and procedures are being implemented; however, they may not be doing so routinely. Monitoring implementation of records management practices through the use of internal controls is still a weak area.

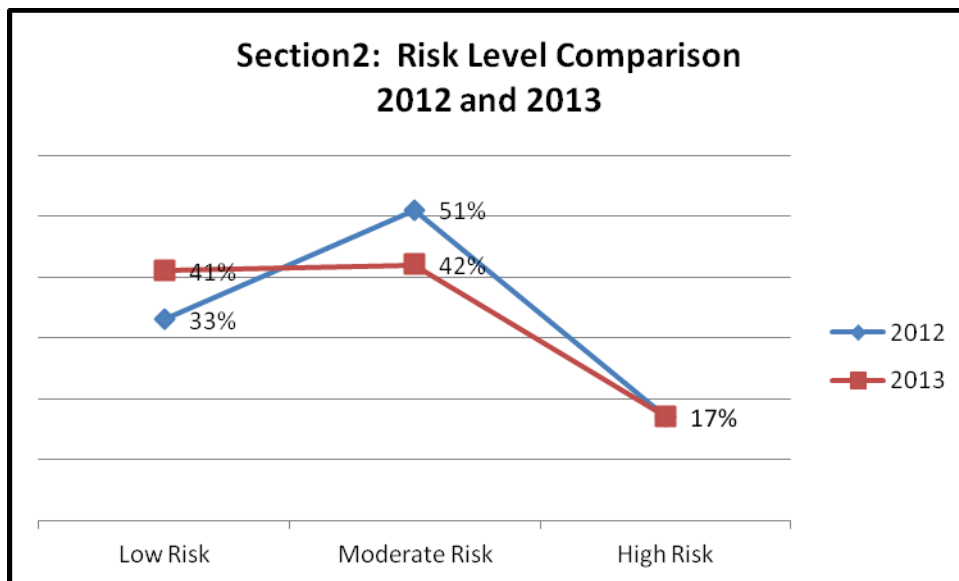


Figure 4

## Internal controls<sup>11</sup>

Internal controls are a series of ongoing actions and activities that are integral to monitoring the implementation of records management policies and procedures. They are processes designed to provide reasonable assurance regarding the achievement of objectives in the following areas: effectiveness and efficiency of operations; reliability of reporting; and compliance with applicable laws and regulations. An internal control consists of ongoing tasks and activities. These tasks are performed by people, as analytics and investigative actions are often required. Having stand alone policy manuals, systems, and forms is not sufficient. An internal control provides reasonable assurance to an organization's management and is geared to the achievement of objectives in one or more areas.

We asked agencies if, in addition to their policies and records schedules, they had established controls to ensure that permanent records are transferred to NARA and to prevent the premature destruction of records and information. We also asked agencies to describe how they test their controls to ensure their effectiveness.

We started asking about internal controls in 2011, particularly in regards to the transfer of permanent records. Since first asking the question, 14% more agencies (68% total) report today that they have implemented internal controls to ensure that all eligible permanent records in all media are transferred to NARA according to approved records schedules (36 CFR 1222.26(e)). However, additional follow-up information gathered on the RMSA and during follow-up validation interviews with Agency Records Officers, make it clear that there is no uniform understanding of internal controls, performance goals, and performance measures in the context of records management.

Consistent with previous assessments, some agencies report this year that they have robust control activities and practices such as clearly defined roles and responsibilities and controlled access to records and records storage areas. However, many other agencies simply cited their records schedules as internal controls without indicating what mechanisms they use to verify that implementation is being done correctly, routinely, and consistently. In numerous cases, agencies continue to be following rote checklists that neither reflect real risk assessment nor lead to the implementation of appropriate controls based on those risks. We also found that few agencies test their controls. Without regular testing, agencies cannot ensure that their controls are effective or that they provide reasonable assurance that the program is compliant with Federal laws and regulations.

In response to concerns that records management lacks standardized definitions of internal controls, NARA has created and is leading an inter-agency Records and Information Management (RIM) Maturity Model working group. This group will define internal controls in

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<sup>11</sup>2013 *Internal Control - Integrated Framework*, Committee of Sponsoring Organizations (COSO) Executive Summary, May 14, 2013, <http://www.coso.org/documents/Internal%20Control-Integrated%20Framework.pdf>; and OMB Circular A-123, *Management's Responsibility for Internal Control*, December 21, 2004.

three areas: 1) Management Support and Organizational Structure; 2) Policy, Standards, and Governance; and 3) RIM Program Operations.

### **Evaluations, inspections, and audits**

Agencies should be conducting routine evaluations, inspections, or audits of how records management policies and procedures are being implemented. This year 75% of agencies report doing so. This percentage is a little lower than in 2012 but higher than in 2011. The positive news is that of those who assess their programs in this way, 67% have done so within the last year. This is up sharply from 45% in 2012.

### **Performance goals**

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

In the current self-assessment the number of agencies indicating they have established performance goals is up slightly to 53% from 49% last year. There was also an increase in agencies answering 'Currently under development' (31.5% in 2013 and 28% in 2012), indicating that more work is being done in this area.

### **Vital records**

The area of vital records remains stable with 80% of agencies reporting that they identify vital records for all program and administrative areas. However, only 63% of agencies report updating their vital records plan annually. While this is the same as in 2012, it is nearly a 20% increase from 2011. It is possible that Agency Records Officers might be seeing the protection of vital (or essential information) as an information technology and emergency management issue and not a records management issue. This attitude does not take into consideration that records managers may have unique knowledge of how records are used, who uses them, whether they are needed to recover from a disaster, and how long an agency can function without them.

### **Small and very small agencies**

Oversight and compliance is an area where most respondents need to improve. Fewer than half (105 of 251) are in the low risk category. Small and very small agencies score particularly poorly in this section. Only 30 out of 73 small agencies and 9 out of 38 very small agencies scored in the low risk category and for those that scored in the moderate category, the scores border on high risk.

## **Findings**

- The number of agencies that are developing internal controls, performance goals, and performance measures has increased modestly.
- However, there is a need for more guidance to foster a clearer understanding of internal controls, performance goals, and performance measures in the context of records management.
- The frequency with which agencies conduct routine RM evaluations, inspections, and audits is increasing.
- Small and very small agencies in particular are not establishing oversight and compliance measures for their records management programs.
- Vital records programs are stable in the majority of agencies.

## SECTION THREE: RECORDS MANAGEMENT PROGRAM

### *RECORDS DISPOSITION*

This section focuses on lifecycle management of records. Agencies with an effective records disposition program manage their records by maintaining current records schedules, ensuring proper storage, and providing for prompt final disposition. 36 CFR 1224 sets policies and establishes standards, procedures, and techniques for the disposition of all Federal records in accordance with 44 U.S.C. Chapters 21, 29, 31 and 33.

This year, 5 of the 14 questions were scored in this section for a total of 15 possible points. We also provided an opportunity for agencies with special circumstances surrounding the transfer of permanent records to NARA to earn points where in previous RMSAs they may have been penalized. These special circumstances included permanent records that cannot be transferred due to legal holds and agencies that are not old enough to have permanent records eligible for transfer. The focus of this section was on the transfer of permanent records and records storage. While in previous RMSAs we asked about retention scheduling, we did not ask such questions in the current self-assessment because there was a requirement to identify unscheduled records in M-12-18.

#### **Trends**

The number of agencies scoring in the low risk category in this section increased almost 24% from last year. The number of agencies scoring in the moderate risk category decreased 13%, and the number of agencies scoring in the high risk category decreased by 12%. The dramatic change stems more from modifications we made to RMSA scoring this year (described earlier) than from improvements agencies have made to their programs.

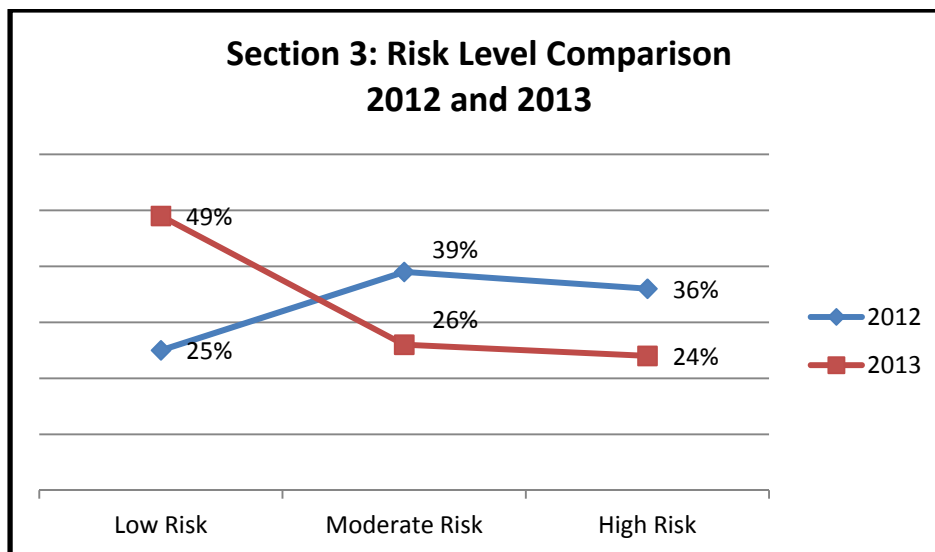


Figure 5



## **Permanent records**

The percentage of agencies transferring permanent records to NARA, irrespective of format, did not change significantly from previous years, although comparisons between years for this question is difficult because we have not always worded the questions consistently. Specifically, we have at times framed differently the matter of the frequency of records transfer. In the first three RMSAs (2009-2011), NARA asked if records had been transferred in the prior fiscal year. In 2012, NARA eliminated any reference to a fiscal year, asking merely if agencies transferred records to NARA. As agencies could answer ‘Yes’ to these questions if they had transferred records to NARA at any point, the percentage of ‘Yes’ answers rose significantly. This year, NARA returned to asking agencies if they had transferred records to NARA in the prior fiscal year. The scores returned more or less to pre-2012 levels. This indicates that while agencies are transferring permanent records, they are not necessarily doing so consistently and annually.

There are a variety of reasons why agencies may not be transferring permanent records annually including legal holds; records still being used for business purposes; or records not old enough for transfer. Another possibility is that agencies have not fully identified their permanent records – a matter addressed in M-12-18, which requires agencies to identify permanent records 30 years old or older.

## **Permanent electronic records**

The number of agencies reporting the transfer of electronic records in a given fiscal year has lagged consistently behind, by 40 or 50% every year since the RSA began, the number of agencies that report transferring non-electronic records. When agencies were asked to explain their inability to transfer electronic records in the current assessment, many mentioned that they do not have electronic records scheduled. Several agencies also reported that they have yet to be trained on NARA’s Electronic Records Archives (ERA) or that they have delayed the transfer of electronic records because they are in the process of implementing a Records Management Application (RMA) or a large scanning project.

As indicated earlier, the validation process did find some discrepancies between what agencies reported and the data tracked by NARA. Nineteen percent of respondents indicated they have no permanent electronic records scheduled; however, the results of the validation determined that 42% of those agencies actually do. In addition, 30% of agencies that indicated they had transferred permanent electronic records to NARA in FY 2013 had not. This includes four agencies that had never transferred permanent electronic records to NARA. Of those agencies that indicated no permanent electronic records were eligible for transfer in FY 2013, 22% did have records eligible.

## **Permanent non-electronic records**

The percentage of agencies reporting the transfer of non-electronic records to NARA in a given fiscal year has remained more or less unchanged in the RMSA's five-year history. In the RMSA's first year (2009), 47% of agencies reported transferring non-electronic records. In the current assessment, 49% of agencies report transferring non-electronic records to NARA. Of those who replied on the current assessment that they did not transfer non-electronic records in FY 2013, 27% said that they had no records eligible for transfer. So 76% of agency respondents either transferred records or reported that they did not have records to transfer. That still leaves a fifth of agencies that may have non-electronic records eligible for transfer that did not do so.

## **Records storage**

It has been several years since we asked questions regarding inactive records storage, so we asked them this year. The results show agencies are using a combination of options including the Federal Records Centers operated by NARA; agency operated records centers; commercial storage providers; and agency office space. The most significant finding from this group of questions is that many agencies do not know if the space they use is compliant with the facility standards outlined in 36 CFR 1234.

## **M-12-18 requirements 2.2 and 2.5**

M-12-18 includes several requirements for agencies to demonstrate compliance with Federal statutes and regulations. Two of these, identifying permanent records 30 years old and older (2.2) and unscheduled records (2.5), required inventories to be submitted to NARA. In order to help agencies conduct these inventories, NARA provided pre-formatted spreadsheets with instructions and held workshops. As part of the 2013 RMSA, agencies were asked (questions 60 through 63) if they completed these inventories. Overall 65% to 66% of agencies said they had completed the inventories, but only 42% actually sent back their completed spreadsheets. Some additional spreadsheets have been received since these statistics were gathered in February 2014.

## **Small and very small agencies**

Size of an agency does not seem to be a determining factor when it comes to performance in this section. Overall, 49% of all agencies fall into the low risk category in section three, whereas 45% of small agencies and 42% of very small agencies are low risk. These numbers suggest that smaller agencies are only at a slight disadvantage over larger agencies in managing the disposition of their records.

The question of size aside, more than half of all agencies are in the moderate to high risk categories for managing records dispositions. These agencies still need to improve their efforts to identify and transfer permanent records; schedule records; and properly store them.

## **Findings**

- Agencies need to improve their efforts to identify and transfer permanent records to NARA.
- Agencies need to be more aware of facility standards as outlined in 36 CFR 1234 and where their records are being stored.
- Agencies need to improve their efforts to identify and schedule unscheduled records.

## SECTION FOUR: RECORDS MANAGEMENT PROGRAM

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### *ELECTRONIC RECORDS*

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

This section contains 10 scored questions for a total of 33 possible points. There are nine additional follow-up questions. Questions focus on the integration of records management controls into new and existing systems; preservation of electronic records in a usable format; training in electronic records management; and the preservation of email records.

The majority of records today are created and maintained electronically. While there is still a large volume in paper, properly managing records electronically is becoming one of the most important elements of a records management program. Integrating records management into agency business process and into information governance is critical as more and more information is being maintained digitally. The ability to create and maintain information electronically increases the speed of access and often the accuracy of information, but, it also creates challenges for preservation and access overtime.

This year's RMSA asks a series of questions to determine how well Federal records management programs are managing electronic records and how well records management is integrated into an agency's information technology procedures to ensure recordkeeping requirements are built into new systems. Scores in this section should help agencies determine how well they are doing and help them meet the two main electronic records goals of M-12-18, managing all permanent records in an electronic format by December 31, 2019, and managing all email (temporary and permanent) in an *accessible* electronic format by December 31, 2016.

#### **Trends**

The results this year show an overall improvement in the management of electronic records. There has been a 12% drop in the number of agencies in the high risk category in this section and a small rise in the percentage of agencies in the moderate risk category (8%) and in the low risk category (3%). While these are not major changes, they do show a gradual positive trend.

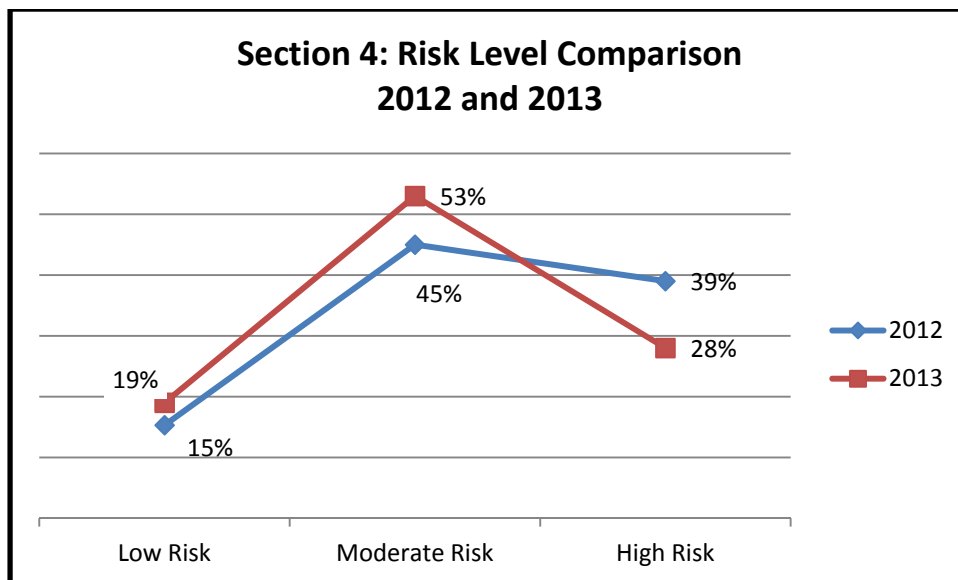


Figure 6

Since the RMSA began five years ago, some progress has been made in the number of agencies reporting compliance with certain regulations on the management of electronic records. In other areas of electronic records management, little change seems to have occurred. Even in areas where improvement has been noted, smaller agencies lag behind larger agencies in reporting compliance with electronic records management regulations.

#### Areas with some change

Areas where increased compliance has been reported include: internal controls for electronic records; maintaining inventories of electronic systems that contain disposition authorities; some aspects of email management; and data migration.

- In the last three years, the number of agencies reporting they have established internal controls to ensure the reliability, integrity, authenticity, and usability of electronic records has increased by about 10%.
- The percentage of agencies reporting that they maintain an inventory of electronic systems with scheduling information is 80%, which is up 10% from last year.
- The percentage of agencies claiming to have policies and procedures pertaining to the management of email with retention periods of 180 days or longer has increased by 16% since 2011 (2011 – 67%, 2013 – 83%).
- Fewer agencies report using print and file as a method to capture email (2011 – 81%, 2013 – 74%), and more agencies report using an Electronic Records Management System (ERMS) to manage email (8% increase over 2011) and/or an email archiving system (16% increase over 2011).

The most dramatic increase in positive responses in this section of the RMSA, however, comes in the number of agencies reporting they have procedures for migrating records to new formats or storage media to ensure usability.

- This year, 23% more agencies answered affirmatively to this question than in 2011 when it was first asked (2011 – 40%, 2013 – 63%).
- Moreover, of those agencies that have migration policies in place, 84% report this year that records staff are involved in the migration of records.

### **Areas remaining the same**

Some areas where little change has occurred over the years include: particular aspects of email management, building RM functionality into electronic systems, and ensuring RM staff participation in the development of new electronic systems.

- The percentage of agencies that offer staff-wide training on email management has largely remained unchanged between 2011 and 2013, around 70%.
- Approximately a third of agencies report auditing the management of email, a percentage that has remained more or less unchanged since the question was first asked in 2010.
- There have been only small changes in the percentage of agencies reporting that they ensure that RM functionality is built into electronic systems (2011 – 55%, 2013 – 60%), and in the percentage reporting that RM staff is involved in the design and development of electronic systems (2009 – 58%, 2013 – 66%).

There are still a number of respondents who do not have the required training and/or knowledge in electronic records management; did not take the time to seek out an appropriate answer; or rely on their information technology staff who may not have recordkeeping in mind when managing systems.

### **Email**

Email plays a major role in how agencies communicate and conduct business. There has been some improvement in responses to questions that focus exclusively on email. For example, 83% responded that they have policies and procedures in place to handle email records that have a retention period longer than 180 days (36 CFR 1236.22). In 2012, 68% responded that they had such policies and procedures. However, the number of agencies who audit compliance with agency email policies remains very low, between 32% and 38%. Training and awareness for staff, including senior staff and contractors, remains below 70%, and for those that do have email management training, the training is not always mandatory.

As mentioned above, there also seems to be a gradual movement away from print and file methods for managing email. Over the last two years, seven percent fewer agencies report using this method. Agencies are gradually replacing print and file with automated approaches. In recent years we've seen modest increases in the number of agencies that report managing electronic communications either in an ERMS or an email archiving system.

This year we asked some non-scored questions about agencies' policies and procedures as they relate to multiple email accounts and as they relate to conducting agency business on personal email accounts. A significant minority of agencies (approximately a quarter) allow staff to maintain more than one official email account. Of this group, nearly 75% have policies and procedures in place mandating how these duplicate accounts are to be managed. A smaller subset of agencies (nearly 10%) allows staff to conduct official business on personal email accounts. Of this subset, only 58% have policies requiring that official email sent and received on personal accounts must end up in an agency records keeping system. Agencies that allow the use of personal email without this requirement, while small in number, are at high risk of losing email.

### **Small and very small agencies**

Notably, small and very small agencies fall 10% to 15% behind the average for most of the questions on the RMSA about electronic records management. For example, only 48% have policies in place for data migration as opposed to 63% of agencies overall. These agencies are particularly behind when it comes to having inventories of electronic systems (15% behind the average of agencies as a whole), having policies for managing emails less than 180 days old (16% behind the average), and providing staff-wide training on the management of email (15% behind the average).

### **Findings**

- Similar to the last two years, approximately two-thirds of respondents report that their agencies integrate records management controls into new and existing systems.
- Nearly 10% more agencies maintain electronic records inventories that include scheduling information in 2013 than in 2012.
- The number of agencies reporting that agency records management staff participate in the design and development of electronic systems remains the same (66%).
- Nearly 20% more agencies report having procedures for the migration of records and related metadata in 2013 than in 2011.
- Agencies have policies and procedures in place for email, but, there is little or no auditing for compliance.
- As noted in previous years, agency records management staff require better education and training in the management of electronic records. A number of respondents were unable to answer, or did not understand, several questions.

## DEMOGRAPHIC QUESTIONS

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Each year we ask a variety of demographic questions to help improve the RMSA and to give agencies a chance to identify challenges or initiatives that are not specifically covered by the questionnaire. 2013 marks the first year SAOs are required under M-12-18 to submit a report to NARA that details RM initiatives and challenges in their agencies, particularly in respect to the transformation to a digital government and the use of cloud services. Therefore, we did not ask for any extra detail in the RMSA in these areas. However, we did ask more detailed questions about the RMSA itself including how long it took to complete; who else the respondent consulted to complete it; if the respondent was the Agency Records Officer; and if the SAO reviewed and concurred with their 2013 response.

Agencies report that it took on average approximately 10 hours to gather all of the information needed to complete the RMSA. Although this may represent some level of burden, we believe the time responding to the RMSA is well spent. Thoroughness is required if the information and results are to have value to agencies for future planning and value to NARA for guiding improvements to services to agencies and improvements to oversight initiatives.

The respondents consulted a variety of other staff in completing the RMSA including:

- Senior Agency Officials
- Chief Information Officers
- Chief Privacy Officers
- Office of General Counsel
- Program managers
- Information technology staff
- Records liaison officers
- Administrative staff
- Department Records Officers (by component agency Records Officers)

SAOs were officially designated in 2012, after the 2012 RMSA was conducted. This means that 2013 marks the first year that we could ask specifically about SAO review and/or concurrence with RMSA responses. In 2013, 77% of agencies indicated that the SAO had reviewed and concurred with responses, 21% said they had not, and 2% answered 'Do not know'.

Generally, the RMSA is completed by the Agency Records Officer, but occasionally this responsibility is delegated to someone else. This year 86% of respondents were the Agency Records Officer.



## APPENDIX I

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### *RECOMMENDATIONS FOR EXECUTIVE ACTION*

The following recommendations, many of which carry over from previous self-assessments, are intended to provide agencies with ways to improve their records management programs as well as to support the goals and targets established in *Managing Government Records Directive* (M-12-18).<sup>12</sup>

#### ***The role of the Senior Agency Official for Records Management is critical***

- SAOs must take responsibility to ensure that all parts of their agency understand the importance of effective records and information management in meeting mission needs.
- SAOs must also ensure compliance with records management regulations and policies throughout the organization.
- SAOs must ensure that their agency deploys the resources required to meet the broader M-12-18 goals and ensure that their Agency Records Officer and general records and information staff members have the support needed to carry out their responsibilities.

#### ***Records management activities***

- Agencies must develop agency-specific records management training for employees at all levels of the organization.
- Agencies should have and update periodically a records management directive supported by policies and procedures.

#### ***Oversight activities***

- Agencies should establish performance goals for their records management programs that are specific, measurable, achievable, relevant, and time-bound.
- Agencies should establish performance measures for their records management programs that enable them to track their progress towards achieving their performance goals.
- Agencies should conduct risk assessments of their records management programs to identify what types of internal controls are necessary and regularly monitor and test the controls to ensure their efficacy and currency.
- NARA should work with the Federal records management community to provide guidance on establishing internal controls for records management programs.
- Agencies should conduct periodic evaluations, assessments, and audits of the implementation of their records management program.

#### ***Records disposition***

- Agencies should identify and schedule permanent records and ensure all eligible permanent records 30 years old or older are transferred to NARA.
- All agency records must be scheduled in accordance with 36 CFR 1224.

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<sup>12</sup> M-12-18.

- Agency Records Officers should initiate and establish collaborative relationships with program management, information technology staff, and with NARA experts to facilitate the transfer of permanently valuable electronic records to the National Archives.

### *Electronic records*

- Agencies should continue to pursue technological solutions to electronic recordkeeping and engage in efforts by NARA and other oversight entities to meet the relevant goals in M-12-18.
- According to OMB Circular A-130, “Management of Federal Information Resources,” and other guidance, agencies must incorporate records management and archival functions into the design, development, and implementation of information systems.
- NARA should work with OMB to ensure records management is included in the design of information systems and built into the information technology governance process.
- Agencies must recognize that electronic recordkeeping is a joint responsibility of records management and information technology staff.
- Agencies must require staff with records management responsibilities to attend basic electronic records training on an annual basis.
- Agencies must ensure that official email messages are preserved in appropriate recordkeeping systems.
- Agencies must maintain records in usable formats throughout their lifecycle to comply with 36 CFR 1236.

## APPENDIX II

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### *COMPLETE LIST OF M-12-18 GENERATED AND OTHER INITIATIVES*

Part II of the *Managing Government Records Directive* (M-12-18)<sup>13</sup> contains a list of action items or initiatives for NARA and other agencies (OMB and the Office of Personnel Management (OPM)) to support agency records management programs and the implementation of M-12-18.

The following is a list of M-12-18 generated initiatives and other initiatives that are working to improve Federal records management and the accessibility of public information.<sup>14</sup>

- Producing the Capstone approach to managing email

Capstone offers agencies the option of using a more simplified and automated approach to managing email, as opposed to using either print and file systems or records management applications that require staff to file email records individually. Using this approach, an agency can categorize and schedule email based on the work and/or position of the email account owner. The Capstone approach allows for the capture of records that should be preserved as permanent from the accounts of officials at or near the top of an agency or an organizational subcomponent. An agency may designate email accounts of additional employees as Capstone when they are in positions that are likely to create or receive permanent email records.

- Facilitating SAO involvement and oversight of agency records management programs

By conducting individual briefings and group meetings with SAOs NARA is answering questions and establishing a foundation for increased engagement by the SAOs in the managing of Federal records and information.

- Working with OPM to establish a formal records management occupational series

As directed by M-12-18, OPM is working on the establishment of a formal records management job series. The purpose of the creation of this job series is to elevate records management roles, responsibilities, and skill sets for agency records officers and other records professionals.

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<sup>13</sup> M-12-18.

<sup>14</sup> See *Records Express Blog*, <http://blogs.archives.gov/records-express/>, for more detailed information on M-12-18 initiatives.

- The development of two records management community of interest groups to help solve records management challenges
  - Developing a comprehensive plan in collaboration with stakeholders to describe suitable approaches for the automated management of email, social media, and other types of digital record content, including advanced search techniques
  - Creating an intergovernmental Automated Electronic Records Management working group to explore suitable approaches for the automated management of all types of digital record content, including advanced search techniques

- Releasing revised and expanded transfer guidance for electronic records

NARA Bulletin 2014-04: Revised Format Guidance for the Transfer of Permanent Electronic Records, released January 31, 2014, specifies which file formats are preferred and acceptable when transferring permanent electronic records to NARA (see the file format tables at <http://www.archives.gov/records-mgmt/policy/transfer-guidance-tables.html>). Because files formats change frequently, the tables will be updated as needed to reflect new preferred and acceptable formats. Criteria such as the availability of technical specifications and licensing restrictions will be used to determine whether a format is sustainable and appropriate for use with permanent electronic records.

Formats are identified by name and by the relevant specification that defines appropriate encoding methods. Many file formats, especially those used with digital audio and video, are composed of multiple parts including a wrapper, which is the file format, and an embedded encoding stream or codec. In these cases the format category table will include a column that specifies the codec or codecs that may be used with each format. Agencies must submit electronic records in files that are valid both according to the wrapper and any specified codec standards.

- Promulgating guidance on managing social media records and managing records in the cloud

NARA is working to provide guidance on managing social media records and managing records in the cloud. These initiatives are ongoing. More information on their progress will be released through the *Records Express Blog* located at <http://blogs.archives.gov/records-express/>.

- Providing a government-wide analytical tool to evaluate the effectiveness of records management programs by:
  - Leading an inter-agency RIM Maturity Model working group

NARA is working with the Federal Records Council to create a RIM Maturity Model that provides an easy to use analytical tool for agencies to measure the strengths and

weaknesses of their RIM programs and to help agencies target their limited resources more effectively. This initiative is ongoing. More information on their progress will be released through the *Records Express Blog* located at <http://blogs.archives.gov/records-express/>.

- Updating the Records and Information Management Self-Evaluation Guide (this guide will be available at [www.archives.gov](http://www.archives.gov) in the future)
- Continuing to conduct and improve the annual RMSA
- Enhanced NARA oversight by establishing a dedicated team within the Office of the Chief Records Officer (Records Management Oversight Section in the Policy Analysis and Enforcement Division) responsible for conducting records management program inspections and reviews to identify issues, provide recommendations, and work with agencies to find solutions.
- Improving access to records management training and assisting agencies to meet the M-12-18 requirement that, by December 31, 2014, Agency Records Officers must hold the NARA certificate of Federal Records Management Training and new incumbents must possess the certificate within one year of assuming the position of Agency Records Officer by:
  - Increasing the number of Knowledge Area courses offered so that agencies can meet the M-12-18 requirement that, by December 31, 2014, Agency Records Officers must hold the NARA certificate of Federal Records Management Training and new incumbents must possess the certificate within one year of assuming the position of Agency Records Officer
  - Offering new free or low-cost records management training webinars and online videos
- Updating and revising the General Records Schedules

General Records Schedules (GRS) are issued by the Archivist of the United States to provide disposition authorization for records common to several or all agencies of the Federal Government.

NARA has a dedicated team to, over the next five years, update and revise the GRS, many of which are severely outdated and no longer meet the current needs of agencies. This initiative is ongoing. More information on their progress will be released through the *Records Express Blog* located at <http://blogs.archives.gov/records-express/>.

## APPENDIX III

### *2013 RECORDS MANAGEMENT SELF-ASSESSMENT QUESTIONNAIRE WITH RESPONSE STATISTICS*

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

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

<b>1. Is there a person in your agency who is responsible for coordinating and overseeing the implementation of the records management program? (36 CFR 1220.34(a))</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	99%	253
No	0%	1
Do Not Know	0%	1
<b><i>Number of respondents answering this question</i></b>		<b>255</b>

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

<b>3. Does your agency have a records management directive(s)? (36 CFR 1220.34(c))</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	94%	239
No	4%	11
Do Not Know	2%	4
<b><i>Number of respondents answering this question</i></b>		<b>254</b>

<b>4. If Yes: When was your agency's directive(s) last reviewed and/or revised to ensure it includes all new records management policy issuances and guidance?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
FY 2013 - present	61%	145
FY 2010 - 2012	22%	53
FY 2007 - 2009	8%	18
FY 2006 or earlier	9%	21
Do not know	1%	2
<b><i>Number of respondents answering this question</i></b>		<b>239</b>

A program area is responsible for mission-related activities. An administrative area is responsible for activities not specific to the mission of the agency. (36 CFR 1220.34(d))

**5. Does your agency have a network of designated employees within each program and administrative area who are assigned records management responsibilities? These individuals are often called Records Liaison Officers (RLOs) though their titles may vary. (36 CFR 1220.34(d))**

Answer Options	Response Percent	Response Count
Yes	83.5%	212
No	8.3%	21
Do not know	0.8%	2
Not applicable	7.5%	19
<b><i>Number of respondents answering this question</i></b>		<b>254</b>

For the following questions, formal records management training is the communication of standardized information that improves the records management knowledge, skills, and/or awareness of agency employees. Training can be either in a classroom setting or distance-based (e.g., web-based training), but it *must*:

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

**6. If Yes: Does your agency have internal records management training\*, based on agency policies and directives, for employees assigned records management responsibilities? (36 CFR 1220.34(f))**

\*Includes NARA's records management training if it was customized specifically for your agency.

Answer Options	Response Percent	Response Count
Yes	84%	178
No	14%	29
Not applicable	2%	5
<b><i>Number of respondents answering this question</i></b>		<b>212</b>

7. If Yes: Please provide the number of employees assigned records management responsibilities that your agency trained during FY 2013.

\*\*Do not include the number of employees who attended NARA's records management training workshops unless such training was customized specifically for your agency.

**8. Has your agency developed internal, staff-wide formal training\*, based on agency policies and directives, which helps agency employees and contractors fulfill their recordkeeping responsibilities? (36 CFR 1220.34(f))**

\*Includes NARA's records management training if it was customized specifically for your agency.

Answer Options	Response Percent	Response Count
Yes	74%	188
No	19%	48
Do not know	0%	1
Not applicable	7%	17
<b><i>Number of respondents answering this question</i></b>		<b>254</b>

9. If Yes: Please provide the number of your agency's employees and contractors who were trained during FY 2013.

\*\*Do not include the number of employees who attended NARA's records management training workshops unless such training was customized specifically for your agency.

Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions. (GRS 23, 5a)

**10. Does your agency require that all senior and appointed officials, including those incoming and newly promoted, receive training on the importance of appropriately managing records under their immediate control? (36 CFR 1220.34(f))**

Answer Options	Response Percent	Response Count
Yes	69%	176
No	28%	70
Do not know	3%	8
<b><i>Number of respondents answering this question</i></b>		<b>254</b>



## **Section Two: Records Management Program – Oversight and Compliance**

Agency records management programs must provide for effective controls over the creation, maintenance, and use of records in the conduct of current business. (36 CFR 1220.30(c)(1))

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

Internal control is:

- Geared to the achievement of objectives in one or more categories—operations, reporting, and compliance;
- A process consisting of ongoing tasks and activities—a means to an end, not an end in itself;
- Carried out by people—not merely about policy and procedure manuals, systems, and forms, but about people and the actions they take at every level of an organization to effect internal control;
- Able to provide reasonable assurance—but not absolute assurance, to an entity’s senior management;
- Adaptable to the organization’s entire structure—flexible in application for the entire entity or for a particular regional office, division, operating unit, or business process.

Control activities occur throughout the organization, at all levels and in all functions. They include a range of activities as diverse as approvals, authorizations, verifications, reconciliations, reviews/audits of operating performance, security of assets (limited access to inventories or equipment) and segregation of duties (separate personnel with authority to authorize a transaction, process the transaction, and review the transaction). Monitoring the effectiveness of internal control should occur in the normal course of business. Periodic assessments should be integrated as part of management’s continuous monitoring of internal control, which should be ingrained in the agency’s operations. (“2013 Internal Control - Integrated Framework,” Committee of Sponsoring Organizations (COSO) Executive Summary, May 14, 2013, <http://www.coso.org/documents/Internal%20Control-Integrated%20Framework.pdf>; and OMB Circular A-123, “Management’s Responsibility for Internal Control,” December 21, 2004.)

**11. In addition to your agency's established records management policies and records schedules, has your agency's records management program developed and implemented internal controls to ensure that all eligible permanent records in all media that are created by your agency are transferred to NARA according to your agency's approved records schedules? (36 CFR 1222.26(e))**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	68%	172
No	23%	57
Do not know	2%	6
Not applicable	7%	18
<b><i>Number of respondents answering this question</i></b>		<b>253</b>

12. If Yes: Please describe the control activities your agency performs to ensure that all eligible permanent records in all media are transferred to NARA according to your agency's records schedules.

\*\*Control activities described must be in addition to your agency's records schedules and directives.

**13. In addition to your agency's established policies and records schedules, has your agency developed and implemented internal controls to ensure that Federal records are not destroyed before the end of their retention period? (36 CFR 1222.26(e))**

\*\* These controls must be internal to your agency. Reliance on information from external agencies (for example, NARA's Federal Records Centers) or other organizations will not be considered an affirmative response for this question.

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	73%	183
No	21%	53
Do not know	2%	6
Not applicable	4%	9
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

14. If Yes: Please describe the control activities your agency performs to ensure that Federal records are not destroyed before the end of their retention period.

\*\*These control activities must be in addition to your agency's records schedules and directives.

An evaluation is an inspection, audit, or review of one or more Federal agency records management programs for effectiveness and for compliance with applicable laws and regulations. It includes recommendations for correcting or improving records management practices, policies, and procedures, and follow-up activities, including reporting on and

implementing the recommendations. Evaluations may be comprehensive (agency-wide) or specific to a program area or organizational unit. (36 CFR 1220.18)

A program area is responsible for mission-related activities. An administrative area is responsible for activities not specific to the mission of the agency. (36 CFR 1220.34(d))

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

<b>15. Does your agency evaluate, by conducting inspections/audits/reviews, its records management program to ensure that it is efficient, effective, and compliant with all applicable records management laws and regulations?</b>		
** For this question, your agency's records management program, or a major component of the program (e.g., vital records identification and management, the records disposition process, records management training, the management of your agency's electronic records) must be the primary focus/target of the inspection/audit/review.		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	75.3%	189
No	18.3%	46
Do not know	2.0%	5
Not applicable	4.4%	11
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

<b>16. If Yes: How often is your records management program, or a major component of the program, evaluated for compliance with agency records management policies and procedures?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Every 1 - 2 years	73.0%	138
Every 3 - 4 years	19.0%	36
Every 5 years	3.7%	7
More than every 5 years	3.7%	7
Do not know	0.5%	1
<b><i>Number of respondents answering this question</i></b>		<b>189</b>

**17. If Yes: Was a written report prepared after the most recent inspection/audit/review was completed?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	76%	143
No	21%	40
Do not know	3%	6
<b><i>Number of respondents answering this question</i></b>		<b>189</b>

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

Performance goals are the target levels of performance. Performance goals should be specific, measurable, attainable, results-oriented, and time-bound. Some examples of performance goals are:

- scheduling all agency records by the end of FY 2014,
- developing computer-based records management training modules by the end of FY 2014, or
- planning and piloting a DOD 5015.2 certified records management application by the end of FY 2015

**18. Has your agency established performance goals for its records management program?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	53.0%	133
No	12.4%	31
Currently under development	31.5%	79
Do not know	1.2%	3
Not applicable	2.0%	5
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

19. If Yes: What are your agency's records management program's performance goals?

20. If Currently under development: Please describe the progress your agency has made towards identifying performance goals for its records management program. Include the time frame for completion in your remarks.

Performance measures are the indicators or metrics against which a program’s performance can be gauged. Performance measures should provide a basis for comparing actual results with established performance goals. The following are examples of performance measures:

- the percentage of agency employees that receive records management training in a year,
- a reduction in the volume of inactive records stored in office space, or
- the percentage of eligible permanent records transferred to NARA in a year.

(“Performance Measurement Challenges and Strategies,” June 18, 2003, white paper associated with the Office of Management and Budget’s Program Assessment Rating Tool (PART), [http://www.whitehouse.gov/sites/default/files/omb/part/challenges\\_strategies.pdf](http://www.whitehouse.gov/sites/default/files/omb/part/challenges_strategies.pdf); and “Government Performance Results Act of 1993,” Section 4, Annual Performance Plans and Reports, <http://www.whitehouse.gov/omb/mgmt-gpra/gplaw2m#hs.>)

<b>21. Has your agency’s records management program identified three or more performance measures for records management activities such as training, records scheduling, permanent records transfers, etc.?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	57%	144
No	14%	35
Currently under development	24%	61
Not applicable	4%	9
Do not know	1%	2
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

22. If yes: What are your records management program’s performance measures. Please state how they are linked to your agency's records management program's performance goals.

23. If Currently under development: Please describe the progress your agency has made towards identifying performance measures for its records management program. Include the time frame for completion in your remarks.

<b>24. Does your agency’s records management program have policies and procedures that instruct staff on how your agency’s permanent records in all formats must be managed and stored? (36 CFR 1222.34(e))</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	80%	202
No	18%	46
Do not know	2%	3
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

Vital records are records needed to meet operational responsibilities under national security emergencies or other emergency conditions (emergency operating records) or to protect the legal and financial rights of the Government and those affected by Government activities (legal and financial rights records). (36 CFR 1223.2)

A program area is responsible for mission-related activities. An administrative area is responsible for activities not specific to the mission of the agency. (36 CFR 1220.34(d))

<b>25. Has your agency identified the vital records of all its program and administrative areas? (36 CFR 1223.16)</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	80%	202
No	10%	25
Do not know	6%	14
Not applicable	4%	10
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

<b>26. How often does your agency review and update its vital records inventory? (36 CFR 1223.14)</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Annually	63%	157
Every 2 - 3 years	13%	33
Every 4 - 6 years	8%	20
Never	3%	7
Do not know	14%	34
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

<b>27. Is your vital records plan part of the Continuity of Operations (COOP) plan?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	87%	218
No	9%	22
Do not know	4%	11
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

### Section Three: Records Management Program - Records Disposition

Permanent records are those for which the disposition is permanent on SF 115, Request for Records Disposition Authority, approved by NARA on or after May 14, 1973. (36 CFR 1220.18)

<b>28. Does your agency have permanent non-electronic records?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	91%	229
No	6%	14
Do not know	3%	8
<i>Number of respondents answering this question</i>		<b>251</b>

<b>29. Did your agency transfer permanent non-electronic records to NARA during FY 2013? (36 CFR 1235.12)</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	49%	124
No	49%	122
Do not know	2%	5
<i>Number of respondents answering this question</i>		<b>251</b>

<b>30. If No: My agency did not transfer permanent non-electronic records to NARA during FY 2013 because:</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Records are under a legal hold or freeze	6%	7
No records were eligible for transfer during 2013	45%	57
New agency, records are not yet old enough to transfer	10%	13
NARA deferred or refused transfer of the records	2%	2
Other	37%	47
<i>Number of respondents answering this question</i>		<b>126</b>

<b>31. Has your agency transferred, or does it plan to transfer, permanent non-electronic records to NARA in FY 2014?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	71%	178
No	14%	34
Do not know	11%	28
Not applicable	4%	11
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

<b>32. Does your agency have permanent electronic records/systems?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	77%	194
No	19%	48
Do not know	4%	9
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

<b>33. Did your agency transfer permanent electronic records to NARA during FY 2013? (36 CFR 1235.12)</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	29%	73
No	62%	156
Do not know	3%	7
Not applicable	6%	15
<b><i>Number of respondents answering this question</i></b>		<b>251</b>



<b>34. If No: My agency did not transfer permanent electronic records to NARA during FY 2013 because:</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Electronic records/systems are under a legal hold or freeze	4%	6
No electronic records/systems were eligible for transfer during FY 2013	53%	85
New agency, electronic records/systems are not old enough to transfer	8%	13
NARA deferred or refused transfer of electronic records/systems	1%	1
Other	34%	55
<i>Number of respondents answering this question</i>		<b>160</b>

<b>35. Has your agency transferred, or does it plan to transfer, permanent electronic records to NARA during FY 2014?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	45%	113
No	24%	60
Do not know	23%	58
Not applicable	8%	20
<i>Number of respondents answering this question</i>		<b>251</b>

<b>36. Does your agency track when its permanent records – electronic and non-electronic – are due to be transferred to NARA?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	70%	176
No	22%	56
Do not know	2%	6
Not applicable	5%	13
<i>Number of respondents answering this question</i>		<b>251</b>

37. If Yes: Please describe how your agency tracks when its permanent records – electronic and non-electronic – are due to be transferred to NARA.

**38. Where does your agency store its inactive Federal records? Choose all that apply)**

\*\* Indicate if each type of storage facility your agency uses complies – or does not comply – with the standards for records storage facilities found in 36 CFR 1234.

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
<b>Agency storage facility</b>		<b>95</b>
Compliant	61%	58
Not compliant	18%	17
Do not know	21%	20
<b>Federal Records Center (FRC)</b>		<b>227</b>
Compliant	93%	212
Not compliant	2%	4
Do not know	5%	11
<b>Commercial storage provider</b>		<b>71</b>
Compliant	72%	51
Not compliant	8%	6
Do not know	20%	14
<b>Agency office space</b>		<b>196</b>
Compliant	74%	146
Not compliant	13%	25
Do not know	13%	25
<b>Other</b>		<b>28</b>
Compliant	39%	11
Not compliant	25%	7
Do not know	36%	10
<b><i>Number of respondents answering this question</i></b>		<b>251</b>

Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions. (GRS 23, 5a)

**39. Are records management program staff required to conduct exit briefings for senior officials on the appropriate disposition of the records, including email, under their immediate control? (36 CFR 1230.10(a & b))**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	69%	173
No	25%	64
Do not know	2%	5
Not applicable	4%	9
<i>Number of respondents answering this question</i>		<b>251</b>

**40. If Yes: Are the exit briefings documented for purposes of accountability?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	90%	155
No	7%	12
Do not know	3%	6
<i>Number of respondents answering this question</i>		<b>173</b>

**41. Upon separation, are senior officials required to obtain approval from records management program staff or other designated official(s) before removing personal papers and copies of records?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	80%	202
No	17%	42
Do not know	3%	7
<i>Number of respondents answering this question</i>		<b>251</b>

## Section Four: Records Management Program - Electronic Records

Electronic information system means an information system that contains and provides access to computerized Federal records and other information. (36 CFR 1236.2)

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

<b>42. Has your agency incorporated/integrated internal controls to ensure the reliability, authenticity, integrity, and usability of agency electronic records maintained in electronic information systems? (36 CFR 1236.10)</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	66%	165
No	19%	48
Do not know	8%	21
Not applicable	6%	16
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

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

Metadata consists of preserved contextual information describing the history, tracking, and/or management of an electronic document. (36 CFR 1236.2)

<b>43. Does your agency have procedures to enable the migration of records and associated metadata to new storage media or formats so that records are retrievable and usable as long as needed to conduct agency business and to meet NARA-approved dispositions? (36 CFR 1236.20(b)(6))</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	63%	157
No	25%	63
Do not know	12%	30
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

**44. Are records management staff involved in developing procedures to ensure that records are properly migrated from retired systems?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	84%	132
No	11%	17
Do not know	1%	2
Not applicable	4%	6
<b><i>Number of respondents answering this question</i></b>		<b>157</b>

**45. Does your agency maintain an inventory of electronic information systems that indicates whether or not each system is covered by an approved NARA disposition authority? (36 CFR 1236.26(a))**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	80%	199
No	13%	32
Do not know	8%	19
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

**46. Does your agency ensure that records management functionality, including the capture, retrieval, and retention of records according to agency business needs and NARA-approved records schedules, is incorporated into the design, development, and implementation of its electronic information systems? (36 CFR 1236.12)**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	60%	149
No	24%	61
Do not know	10%	25
Not applicable	6%	15
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

47. If Yes: Please describe in detail how your agency ensures that records management functionality, including the capture, retrieval, and retention of records, is incorporated into the design, development, and implementation of its electronic information systems.

**48. Does your agency's records management program staff participate in the design, development, and implementation of new electronic information systems?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	66%	164
No	23%	57
Do not know	4%	11
Not applicable	7%	18
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

For the next question, formal records management training is the communication of standardized information that improves the records management knowledge, skills, and/or awareness of agency employees. Training can be either in a classroom setting or distance-based (e.g., web-based training), but it must:

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

**49. Has your agency developed internal, staff-wide, formal training\*, based on agency policies and directives, on the retention and management of records created and maintained in electronic formats? (36 CFR 1220.34(f))**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	69%	173
No	25%	63
Do not know	1%	2
Not applicable	5%	12
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

Electronic mail system is a computer application used to create, receive, and transmit messages and other documents. Excluded from this definition are file transfer utilities (software that transmits files between users but does not retain any transmission data), data systems used to collect and process data that have been organized into data files or databases on either personal computers or mainframe computers, and word processing documents not transmitted on an email system. (36 CFR 1236.2)

**50. Does your agency have policies and procedures in place to handle email records that have a retention period longer than 180 days? (36 CFR 1236.22)**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	83%	207
No	12%	31
Do not know	5%	12
<i>Number of respondents answering this question</i>		<b>250</b>

Regardless of how many Federal email accounts individuals use to conduct official business, agencies must ensure that all accounts are managed, accessible and identifiable according to Federal recordkeeping requirements. (36 CFR 1236.22)

**51. Do employees in your agency have more than one agency-administered email account? (NARA Bulletin 2013.02)**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	25.6%	64
No	68.8%	172
Do not know	5.6%	14
<i>Number of respondents answering this question</i>		<b>250</b>

**52. If Yes: Does your agency have policies that address these types of accounts and that state that email records must be preserved in an appropriate agency recordkeeping system? (36 CFR 1236.22(b))**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	73%	47
No	25%	16
Do not know	2%	1
<i>Number of respondents answering this question</i>		<b>64</b>

**53. Does your agency allow the use of personal email accounts to conduct official business? (36 CFR 1236.22(b))**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	9.6%	24
No	84.8%	212
Do not know	5.6%	14
<i>Number of respondents answering this question</i>		<b>250</b>

**54. If Yes: Does your agency have policies that address the use of personal email accounts and that state that email records created and received using these accounts must be preserved in an appropriate agency recordkeeping system? (36 CFR 1236.22(b))**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	58%	14
No	38%	9
Do not know	4%	1
<b><i>Number of respondents answering this question</i></b>		<b>24</b>

**55. Does your agency's email system(s) retain the intelligent full names on directories or distribution lists to ensure identification of the sender and addressee(s) for those email messages that are Federal records? (36 CFR 1236.22(a)(3))**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	87%	218
No	4%	11
Do not know	8%	21
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

**56. What method(s) does your agency employ to capture and manage email records? (Choose all that apply)**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Print and file	74%	184
Captured and stored as .PST	54%	135
Captured and stored in an electronic records management system	27%	67
Captured and stored in an email archiving system	54%	136
Not captured and email is managed by the end-user in the native system	17%	42
Other	13%	33
<b><i>Number of respondents answering this question</i></b>		<b>250</b>



**57. Does your agency audit staff compliance with the agency's email preservation policies?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	31%	77
No	56%	141
Do not know	13%	32

**58. If Yes: How often does your agency audit staff compliance with the agency's email preservation policies?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Every 6 months	34%	26
Every year	38%	29
Every 2 years	10%	8
Less frequently than every 2 years	12%	9
Do not know	6%	5
<b><i>Number of respondents answering this question</i></b>		<b>77</b>

For the next question, formal records management training is the communication of standardized information that improves the records management knowledge, skills, and/or awareness of agency employees. Training can be either in a classroom setting or distance-based (e.g., web-based training), but it must:

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

**59. Has your agency developed internal, staff-wide training\*, based on agency policies and directives, on the retention and management of email records? (36 CFR 1220.34(f))**

\*Includes NARA's records management training workshops that were customized specifically for your agency.

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	68%	171
No	24%	59
Do not know	2%	6
Not applicable	6%	14
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

<b>60. If Yes: Is this training mandatory for all staff, including contractor staff and senior officials?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	77%	133
No	21%	37
Do not know	2%	3
<b><i>Number of respondents answering this question</i></b>		<b>173</b>

### **NARA/OMB *Managing Government Records Directive (M-12-18)* Reporting Requirements**

The joint NARA/OMB *Managing Government Records Directive (M-12-18)* of August 24, 2012, includes specific action items towards ensuring government openness and accountability through more complete documentation of Federal business; improved identification, safeguarding, and eventual transfer to NARA of permanent records; and increased efficiency for agencies in their business processes.<sup>15</sup>

Part I, Section 2, Requirement 2.2 of NARA/OMB M-12-18 requires agencies to identify for transfer their permanent records that have been in existence for more than 30 years and to report the information to NARA.

<b>61. Has your agency identified for transfer its permanent records that have been in existence for more than 30 years?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	65%	162
No	29%	72
Do not know	6%	16
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

<sup>15</sup> NARA/OMB *Managing Government Records Directive (M-12-18)*, <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>.

61a. If Yes: Send the spreadsheet with information about your agency's permanent records that have been in existence for more than 30 years to [rmsselfassessment@nara.gov](mailto:rmsselfassessment@nara.gov). See AC 23.2013: NARA/OMB M-12-18 Goals Due On or Before December 31, 2013<sup>16</sup>.

Part I, Section 2, Requirement 2.5 of NARA/OMB M-12-18 requires agencies' Records Officers to identify all unscheduled records by December 31, 2013. This includes all records stored at NARA and at agencies' records storage facilities that have not yet been properly scheduled.

<b>62. Has your agency identified all of its unscheduled records, including those that are stored at NARA and/or at your agency's records storage facilities?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	66%	164
No	29%	72
Do not know	6%	14
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

62a. If Yes: Send the spreadsheet with information about your agency's unscheduled records to [rmsselfassessment@nara.gov](mailto:rmsselfassessment@nara.gov). See AC 23.2013: NARA/OMB M-12-18 Goals Due On or Before December 31, 2013.<sup>17</sup>

## Demographic Questions

<b>63. How many FTEs are in your agency/organization? (Choose one)</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
500,000 or more FTEs	2%	4
100,000 – 499,999 FTEs	3%	7
10,000 – 99,999 FTEs	19%	48
1,000 – 9,999 FTEs	29%	73
100 – 999 FTEs	29%	73
1 – 99 FTEs	15%	38
Not Available	3%	7
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

<sup>16</sup> AC 23.2013: NARA/OMB M-12-18 Goals Due On or Before December 31, 2013, <http://www.archives.gov/records-mgmt/memos/ac23-2013.html>.

<sup>17</sup> AC 23.2013: NARA/OMB M-12-18 Goals Due On or Before December 31, 2013, <http://www.archives.gov/records-mgmt/memos/ac23-2013.html>.

**64. What other staff, offices, or program areas did you consult when you completed this self-assessment? (Choose all that apply)**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Senior Agency Official	85%	212
Office of the General Counsel	22%	54
Program Managers	49%	123
Information Technology staff	68%	170
Records Liaison Officers or similar	54%	134
Administrative staff	42%	104
Other	16%	41
<i>Number of respondents answering this question</i>		<b>250</b>

**65. How much time did it take you to gather the information to complete this self-assessment?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Under 3 hours	20%	51
More than 3 hours but less than 6 hours	21%	53
More than 6 hours but less than 10 hours	19%	48
Over 10 hours	39%	98
<i>Number of respondents answering this question</i>		<b>250</b>

**66. Did your agency's senior management review and concur with your responses to the 2013 Records Management Self-Assessment?**

<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	77%	192
No	21%	52
Do not know	2%	6
<i>Number of respondents answering this question</i>		<b>250</b>

## Contact Information

### Please provide your contact information.

Name:

Agency, Bureau, or Office:

Job Title:

Address:

Address 2:

City/Town:

State:

ZIP/Postal Code:

Email Address:

Phone Number:

What is your job title?

<b>66a. Are you the Records Officer?</b>		
<b>Answer Options</b>	<b>Response Percent</b>	<b>Response Count</b>
Yes	86%	215
No	14%	35
<b><i>Number of respondents answering this question</i></b>		<b>250</b>

If No: Please provide the name of your agency's Records Officer.

Records Officer's Email Address:

Records Officer's Phone Number:

Final Comments, Suggestions, and/or Recommendations (Optional)

NARA reserves the right to request additional documentation or a follow-up meeting to verify your responses. If you wish to provide supporting documentation for your answers or other information to NARA, please send it to [rmsselfassessment@nara.gov](mailto:rmsselfassessment@nara.gov).

Thank you for completing the 2013 Records Management Self-Assessment! If you have any questions about the self-assessment, please send a message to [rmsselfassessment@nara.gov](mailto:rmsselfassessment@nara.gov).

## APPENDIX IV

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### *VALIDATION INTERVIEWS*

#### Selected RMSA Questions for Interviews

Agency records management programs must provide for effective controls over the creation, maintenance, and use of records in the conduct of current business. (36 CFR 1220.30(c)(1))

Internal controls are integral components of an organization's management that provide reasonable assurance of the effectiveness and efficiency of operations; reliability of financial reporting; and compliance with applicable laws and regulations. ("Standards for Internal Control in the Federal Government" (AIMD-00-21.3.1), U.S. Government Accountability Office, November 1999, <http://www.gao.gov/products/AIMD-00-21.3.1>)

Internal control is:

- Geared to the achievement of objectives in one or more categories—operations, reporting, and compliance
- A process consisting of ongoing tasks and activities—a means to an end, not an end in itself
- Carried out by people—not merely about policy and procedure manuals, systems, and forms, but about people and the actions they take at every level of an organization to effect internal control
- Able to provide reasonable assurance—but not absolute assurance, to an entity's senior management
- Adaptable to the organization's entire structure—flexible in application for the entire entity or for a particular regional office, division, operating unit, or business process

Control activities occur throughout the organization, at all levels and in all functions. They include a range of activities as diverse as approvals, authorizations, verifications, reconciliations, reviews/audits of operating performance, security of assets (limited access to inventories or equipment) and segregation of duties (separate personnel with authority to authorize a transaction, process the transaction, and review the transaction). Monitoring the effectiveness of internal control should occur in the normal course of business. Periodic assessments should be integrated as part of management's continuous monitoring of internal control, which should be ingrained in the agency's operations. ("2013 Internal Control - Integrated Framework," Committee of Sponsoring Organizations (COSO) Executive Summary, May 14, 2013, <http://www.coso.org/documents/Internal%20Control-Integrated%20Framework.pdf>; and OMB Circular A-123, "Management's Responsibility for Internal Control," December 21, 2004.)

**RMSA Question 11:** In addition to your agency's established records management policies and records schedules, has your agency's records management program developed and implemented internal controls to ensure that all eligible permanent records in all media that are created by your

agency are transferred to NARA according to your agency's approved records schedules? (36 CFR 1222.26(e))

**Follow-up Question 12:** for those who respond 'Yes': Please describe the control activities your agency performs to ensure that all eligible permanent records in all media are transferred to NARA according to your agency's records schedules.

**RMSA Question 13:** In addition to your agency's established policies and records schedules, has your agency developed and implemented internal controls to ensure that Federal records are not destroyed before the end of their retention period? (36 CFR 1222.26(e))

\*\* These controls must be internal to your agency. Reliance on information from external agencies (for example, NARA's Federal Records Centers) or other organizations will not be considered an affirmative response for this question.

**Follow-up Question 14:** for those who respond 'Yes': Please describe the control activities your agency performs to ensure that Federal records are not destroyed before the end of their retention period.

**RMSA Question 15:** Does your agency evaluate, by conducting inspections/audits/reviews, its records management program to ensure that it is efficient, effective, and compliant with all applicable records management laws and regulations?

\*\* For this question, your agency's records management program, or a major component of the program (e.g., vital records identification and management, the records disposition process, records management training, the management of your agency's electronic records) must be the primary focus/target of the inspection/audit/review.

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

Performance goals are the target levels of performance. Performance goals should be specific, measurable, attainable, results-oriented, and time-bound. Some examples of performance goals are:

- scheduling all agency records by the end of FY 2014
- developing computer-based records management training modules by the end of FY 2014
- planning and piloting a DOD 5015.2 certified records management application by the end of FY 2015

**RMSA Question 18:** Has your agency established performance goals for its records management program?

**Follow-up Question 19:** for those who respond 'Yes': What are your agency's records management program's performance goals?

**RMSA Question 39:** Are records management program staff required to conduct exit briefings for senior officials on the appropriate disposition of the records, including email, under their immediate control? (36 CFR 1230.10(a & b))

**RMSA Question 42:** Has your agency incorporated/integrated internal controls to ensure the reliability, authenticity, integrity, and usability of agency electronic records maintained in electronic information systems? (36 CFR 1236.10)

**RMSA Question 46:** Does your agency ensure that records management functionality, including the capture, retrieval, and retention of records according to agency business needs and NARA-approved records schedules, is incorporated into the design, development, and implementation of its electronic information systems?

**Follow-up Question 47:** for those who respond 'Yes': Please describe in detail how your agency ensures that records management functionality, including the capture, retrieval, and retention of records, is incorporated into the design, development, and implementation of its electronic information systems.

**RMSA Question 48:** Does your agency's records management program staff participate in the design, development, and implementation of new electronic information systems? Interviewees were asked to describe in detail records management program staff participation in the design, development, and implementation of new electronic information systems and what happens if records management is not properly being considered.



## APPENDIX V

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### *TOTAL SCORES BY RISK FACTOR*

#### **Low Risk**

Board of Governors of the Federal Reserve System and the Federal Open Market Committee	96
Central Intelligence Agency	93
Consumer Financial Protection Bureau	99

#### **Department of Agriculture**

Agricultural Marketing Service	94
Farm Service Agency	100
Food and Nutrition Service	93
National Agricultural Statistics Service	98
National Institute of Food and Agriculture	98
Rural Development	96

#### **Department of Defense**

Defense Finance and Accounting Service	100
Defense Security Service	97
Defense Threat Reduction Agency	99
Department of the Air Force	93
Department of the Army	90
Department of the Navy	99
Department of the Navy/US Marine Corps	91
Missile Defense Agency	99
National Security Agency	99
Office of the Secretary of Defense	96
US Africa Command	91
US Central Command	100

#### **Department of Education**

Department Level/Headquarters	90
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#### **Department of Energy**

Bonneville Power Administration	90
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#### **Department of Health and Human Services**

Agency for Healthcare Research and Quality	96
Centers for Disease Control and Prevention	90
Health Resources and Services Administration	90

<b>Department of Homeland Security</b>	
US Citizenship and Immigration Services	93
US Secret Service	100
<b>Department of Justice</b>	
Executive Office for United States Attorneys	97
Federal Bureau of Investigation	100
<b>Department of Labor</b>	
Adjudicatory Boards	91
Bureau of Labor Statistics	94
Department Level/Headquarters	94
Employee Benefits Security Administration	94
Employment and Training Administration	98
Mine Safety and Health Administration	94
Occupational Safety and Health Administration	94
Office of Administrative Law Judges	94
Office of Disability Employment Policy	94
Office of Federal Contract Compliance Programs	94
Office of Inspector General	94
Office of Labor-Management Standards	97
Office of Public Affairs	94
Office of the Assistant Secretary for Administration and Management	94
Office of the Assistant Secretary for Policy	92
Office of the Chief Financial Officer	94
Office of the Secretary	91
Office of the Solicitor	94
Office of Workers' Compensation Programs	94
<b>Department of State</b>	100
<b>Department of the Interior</b>	
Bureau of Indian Affairs	100
Bureau of Land Management	99
Bureau of Reclamation	100
Department Level/Headquarters	100
National Park Service	97
Office of Surface Mining Reclamation and Enforcement	92
Office of the Special Trustee for American Indians	100
US Fish and Wildlife Service	96
<b>Department of the Treasury</b>	
Alcohol and Tobacco Tax and Trade Bureau	96
Bureau of the Fiscal Service	92
United States Mint	100

<b>Department of Transportation</b>	
National Highway Traffic Safety Administration	91
<b>Executive Office of the President</b>	
Office of Science and Technology Policy	95
Export-Import Bank of the United States	90
Farm Credit Administration	94
Federal Communications Commission	95
Federal Housing Finance Agency	94
National Mediation Board	94
Office of Personnel Management	100
Office of the Director of National Intelligence	97
US Environmental Protection Agency	92
US Government Accountability Office	99
US International Trade Commission	97
US Securities and Exchange Commission	100
<b>Moderate Risk</b>	
AbilityOne Commission	68
Barry Goldwater Scholarship Foundation	74
Congressional Budget Office	86
<b>Department of Agriculture</b>	
Agricultural Research Service	71
Animal and Plant Health Inspection Service	80
Department Level/Headquarters	88
Economic Research Service	71
Food Safety and Inspection Service	81
Foreign Agricultural Service	88
Grain Inspection, Packers and Stockyards Administration	74
Natural Resources Conservation Service	82
Risk Management Agency	88
US Forest Service	79
<b>Department of Commerce</b>	
Bureau of Economic Analysis	88
Department Level/Headquarters	74
Economic Development Administration	66
International Trade Administration	62
National Institute of Standards and Technology	86
National Oceanic and Atmospheric Administration	86

National Technical Information Service	86
<b>Department of Defense</b>	
Defense Commissary Agency	86
Defense Contract Audit Agency	72
Defense Contract Management Agency	61
Defense Intelligence Agency	76
Joint Chiefs of Staff	66
National Geospatial-Intelligence Agency	77
National Reconnaissance Office	70
Office of Inspector General	67
US Northern Command	72
US Transportation Command	75
<b>Department of Energy</b>	
Department Level/Headquarters	72
Federal Energy Regulatory Commission	74
National Nuclear Security Administration	70
Southeastern Power Administration	70
Southwestern Power Administration	76
Western Area Power Administration	85
<b>Department of Health and Human Services</b>	
Centers for Medicare & Medicaid Services	89
Department Level/Headquarters	79
Indian Health Service	87
Office of the Secretary, Operations Staff	86
Substance Abuse and Mental Health Services Administration	65
<b>Department of Homeland Security</b>	
Department Level/Headquarters	65
Federal Emergency Management Agency	80
Federal Law Enforcement Training Centers	83
Transportation Security Administration	87
<b>Department of Housing and Urban Development</b>	
Department Level/Headquarters	80
<b>Department of Justice</b>	
Bureau of Alcohol, Tobacco, Firearms and Explosives	67
Department Level/Headquarters	88
Executive Office for Immigration Review	67
Office of Justice Programs	85
US Marshals Service	82

<b>Department of Labor</b>	
Bureau of International Labor Affairs	82
Office of Congressional and Intergovernmental Affairs	85
Veterans' Employment and Training Service	85
Wage and Hour Division	87
Women's Bureau	85
<b>Department of the Interior</b>	
Office of the Secretary	85
US Geological Survey	68
<b>Department of the Treasury</b>	
Bureau of Engraving and Printing	63
Department Level/Headquarters	82
Financial Crimes Enforcement Network	74
Internal Revenue Service	88
Office of the Comptroller of the Currency	77
<b>Department of Transportation</b>	
Department Level/Headquarters	67
Federal Aviation Administration	76
Federal Highway Administration	78
Federal Motor Carrier Safety Administration	83
Federal Railroad Administration	87
Federal Transit Administration	83
Office of Inspector General	80
Office of the Secretary	64
Pipeline and Hazardous Materials Safety Administration	88
Research and Innovative Technology Administration	62
Saint Lawrence Seaway Development Corporation	67
Surface Transportation Board	86
<b>Department of Veterans Affairs</b>	
Veterans Benefits Administration	71
Veterans Health Administration	74
Equal Employment Opportunity Commission	75
<b>Executive Office of the President</b>	
Council on Environmental Quality	69
Office of Management and Budget	85
Office of the United States Trade Representative	63

Federal Deposit Insurance Corporation	89
Federal Mine Safety and Health Review Commission	67
Federal Trade Commission	89
General Services Administration	60
Institute of Museum and Library Services	82
Millennium Challenge Corporation	74
National Archives and Records Administration	67
National Endowment for the Arts	81
National Labor Relations Board	78
National Science Foundation	85
Office of the Special Inspector General for Afghanistan Reconstruction	88
Overseas Private Investment Corporation	86
Pension Benefit Guaranty Corporation	67
Postal Regulatory Commission	78
Recovery Accountability and Transparency Board	89
Selective Service System	80
Social Security Administration	81
Tennessee Valley Authority	79
Udall Foundation	81
United States Commission on Civil Rights	65
United States Sentencing Commission	89
US Access Board	67
US African Development Foundation	76
US Agency for International Development	70
US Nuclear Regulatory Commission	70
US Office of Government Ethics	83
US Office of Special Counsel	62
US Trade and Development Agency	60

## **High Risk**

Administrative Office of the US Courts	57
Advisory Council on Historic Preservation	36
American Institute in Taiwan	50
Armed Forces Retirement Home	49
Broadcasting Board of Governors/International Broadcasting Bureau	43
Chemical Safety and Hazard Investigation Board	56
Commodity Futures Trading Commission	48

Corporation for National and Community Service	21
Court Services and Offender Supervision Agency	
Pretrial Services Agency	47
Defense Nuclear Facilities Safety Board	22
<b>Department of Agriculture</b>	
Department Staff Offices	56
<b>Department of Commerce</b>	
Bureau of Industry and Security	59
Departmental Management	50
Economics and Statistics Administration	51
Minority Business Development Agency	19
National Telecommunications and Information Administration	58
Office of the Secretary	44
US Census Bureau	55
US Patent and Trademark Office	50
<b>Department of Defense</b>	
Army and Air Force Exchange Service	38
Defense Information Systems Agency	54
Defense Logistics Agency	53
Defense Technical Information Center	27
National Guard Bureau	42
US European Command	56
US Pacific Command	47
US Special Operations Command	49
<b>Department of Energy</b>	
Energy Information Administration	27
<b>Department of Health and Human Services</b>	
Administration for Children and Families	58
Administration for Community Living	53
Food and Drug Administration	58
National Institutes of Health	53
<b>Department of Homeland Security</b>	
US Coast Guard	49
US Customs and Border Protection	55
US Immigration and Customs Enforcement	58
<b>Department of Housing and Urban Development</b>	
Office of Inspector General	50

<b>Department of Justice</b>	
Drug Enforcement Administration	58
Federal Bureau of Prisons	54
<b>Department of the Interior</b>	
Bureau of Ocean Energy Management	58
Bureau of Safety and Environmental Enforcement	58
<b>Department of Transportation</b>	
Maritime Administration	12
<b>Department of Veterans Affairs</b>	
Board of Veterans' Appeals	44
Department Level/Headquarters	50
National Cemetery Administration	49
<b>Executive Office of the President</b>	
Office of the Director of National Drug Control Policy	59
Federal Election Commission	32
Federal Labor Relations Authority	24
Federal Maritime Commission	48
Federal Mediation and Conciliation Service	58
Government Printing Office	18
International Boundary and Water Commission (US/Mexico)	59
Japan-US Friendship Commission	14
Library of Congress	59
Marine Mammal Commission	39
National Aeronautics and Space Administration	55
National Capital Planning Commission	48
National Credit Union Administration	48
National Endowment for the Humanities	21
National Indian Gaming Commission	52
National Transportation Safety Board	55
Nuclear Waste Technical Review Board	27
Office of Navajo and Hopi Indian Relocation	0
Peace Corps	56
Presidio Trust	42
Railroad Retirement Board	16



United States Institute of Peace	18
US Commission of Fine Arts	30
US Consumer Product Safety Commission	36
US Court of Appeals for Veterans Claims	3
US Election Assistance Commission	18
US Merit Systems Protection Board	29
US Small Business Administration	33

## APPENDIX VI

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### *NON-RESPONDENT LIST\**

American Battle Monuments Commission  
Appalachian Regional Commission  
Federal Retirement Thrift Investment Board  
Harry S. Truman Scholarship Foundation  
James Madison Memorial Fellowship Foundation  
US Holocaust Memorial Council and Museum  
US Tax Court

\*An additional four non-responding components of Department agencies were removed from the list of non-respondents because the information was reported by another component.