

NWM 06.2009

December 16, 2008

MEMORANDUM TO FEDERAL AGENCY RECORDS CONTACTS: Update on NARA's records management oversight activities

In September of this year NARA accepted GAO's recommendations for action as outlined in GAO-08-742, Federal Records: National Archives and Selected Agencies Need to Strengthen E-Mail Management. While NARA has discussed the GAO report and recommendations with agencies at recent Bimonthly Records and Information Discussion Group (BRIDG) meetings and records management conferences such as Federal Day (held as part of ARMA's annual conference in Las Vegas), I would like to take this opportunity to review GAO's recommendations and provide you with an update on NARA's progress and plans for implementing them in FY 2009.

The GAO report recommends that NARA develop and implement an approach to oversight of agency records management programs that provides adequate assurance that agencies are complying with NARA's records management requirements and guidance. Specifically, GAO stated that NARA:

1. Develop various types of inspections, surveys, and other means to evaluate the state of agency records management programs;
2. Develop criteria for using these means of assessment that ensure that they are regularly performed; and
3. Regularly report to the Congress and OMB on the findings, recommendations, and agency responses to its oversight activities, as required by law.

Regarding Recommendation 1, NARA will continue to conduct surveys and records management studies to collect information about how records are being managed in the Federal RM community and will analyze these data in order to provide better guidance to agencies. In addition, NARA will require agencies to complete an annual self-assessment. The self-assessment will consist of two sections: general questions about agency records management and training, and a separate section with questions on a specific records management area. The specific section, which will change each year, will focus on a particular area of interest such as e-mail management or records storage.

With regard to inspections, NARA proposed revised requirements in a new 36 CFR Part 1239 that defines the conditions under which NARA may undertake an inspection and how the inspection will be initiated and carried out with the agency. To comply with GAO's second recommendation as it pertains to inspections, NARA will develop a methodology that will include the criteria and triggers for when to use these means of assessment and how to review and analyze the results.

GAO's Recommendation 3 concerning reporting is an area previously discussed in NARA memorandum, NWM 19.2008 (<http://www.archives.gov/records-mgmt/memos/nwm19-2008.html>). Issued on June 5th, the memorandum discussed NARA's intent to report to Congress and OMB via the annual Performance and Accountability Report (PAR) on two specific areas of agency records management programs: progress on scheduling and transferring electronic records, and actions taken to resolve allegations of unauthorized removal or disposal of Federal records. We will continue to report on these areas in future PARs, but will also expand the scope of our reports to address overall agency compliance with legal requirements including specific activities related to agency self-assessments and inspections.

Throughout FY 2009, we will keep you apprised of our progress on these oversight activities and will be sure to inform you of any milestones or actions where we will need your involvement. We are committed to creating the proper balance between developing guidance to assist you in your work and providing effective oversight over the management of Federal records across the Government.

If you have any questions about this memorandum, please contact the Lifecycle Management Division appraiser or Regional Records Management Contact with whom your agency normally works. A list of the appraisal and scheduling work groups is posted on the NARA web site at <http://www.archives.gov/records-mgmt/appraisal/>. A list of NARA regional records management offices may be found at <http://www.archives.gov/locations/records-management.html>.

SUSAN R. CUMMINGS
Acting Director
Modern Records Programs