



National Archives and Records Administration

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March 31, 2000

Mr. Steven Aftergood
Federation of American Scientists
307 Mass. Ave. NE
Washington, DC 20002

Steve
Dear Mr. Aftergood:

This is in response to your Freedom of Information Act (FOIA) request for the NARA Evaluation of CIA Records Management. I am sending you the copy that has been reviewed for classification. Thank you for your patience in dealing with us during this process.

Sincerely,

Mary
MARY RONAN
NARA FOIA Officer

*National Archives
and Records Administration*

Washington, DC
March 2000



A NARA EVALUATION

RECORDS MANAGEMENT IN THE CENTRAL INTELLIGENCE AGENCY

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**RECORDS MANAGEMENT
IN THE
CENTRAL INTELLIGENCE AGENCY**

A NARA EVALUATION

(U) EXECUTIVE SUMMARY

(U) This evaluation of the records management program of the Central Intelligence Agency (CIA) was performed under the authority granted to the National Archives and Records Administration (NARA) by 44 U.S.C. 2904 and 2906 "to conduct inspections or surveys of the records and records management programs and practices within and between federal agencies." The evaluation involved visits to offices at CIA Headquarters in the Washington, DC, area as well as field sites.

(U) The CIA provides overall guidance and support to intelligence gathering by the U.S. Government and is responsible for collecting, evaluating, and disseminating intelligence relating to national security. Proper records creation and maintenance and the eventual transfer to NARA of permanently valuable records are necessary to document the CIA's fulfillment of its missions.

(U) The CIA already has many elements of a good records management program: Agency regulations clearly define program objectives and responsibilities; Information Management Officers (IMOs) are assigned to establish and direct Information Management programs in each directorate and component; records management training is provided to all employees; and a program has been implemented to ensure a periodic audit of records management throughout the agency. The CIA has developed formal recordkeeping requirements and guidance. The agency's major intelligence gathering and dissemination operations appear to be documented adequately. In most of the offices visited, schedules appear to cover the textual records.

(U) The program, however, does have serious shortcomings that must be rectified to ensure the agency's compliance with federal records management laws and regulations.

(U) CIA has scheduled few of its electronic systems, although the agency maintains thousands of systems, including electronic versions of such key records as finished intelligence products and records relating to covert operations and intelligence assets. Without approved schedules, there is a serious risk that information of great value will not be preserved.

(U) CIA has not issued guidance and implemented measures that address the specific maintenance and preservation needs of nontextual records. This is of particular concern since the lengthy period of time CIA retains permanent nontextual records prior to transfer to NARA requires proactive preservation measures, including, in some instances, the copying of records that were created on obsolete media. In addition, some nontextual CIA series are either unscheduled or are covered by disposition schedules that should be updated.

(U) Problems were also found with the management and disposition of textual records. Current schedules do not reflect the fact that many of the most important CIA records, which were hitherto solely in paper form, are now created and maintained electronically. Some offices use short-term chronological files for documents that should be placed in program/policy files, while in other offices, staff regard the files they accumulate as non-record "soft" files because, they believe, the information in their records is available elsewhere. Because existing schedules call for

the transfer of CIA records to NARA custody when 50 years old, NARA's holdings of permanent agency records are negligible.

(U) To resolve these problems, NARA recommends that CIA:

(U) Work with NARA to ensure that all CIA electronic records are eventually covered by NARA-approved schedules, as required by federal law and regulation;

(U) Ensure the management of nontextual records by developing and implementing preservation guidance, inventorying nontextual holdings, developing schedules for unscheduled series, and accelerating the transfer of permanent records to NARA;

(U) Ensure that schedules for textual records are implemented properly, including those schedule items that cover chronological and working files; and

(U) Modify schedules to provide for the expedited transfer of permanent records to NARA and develop a timetable for the transfer of specific files.

(U) To implement the recommendations contained in this report, additional staff in the records management area is needed.

(U) INTRODUCTION

(U) The Central Intelligence Agency (CIA) was established by the National Security Act of 1947 as an independent agency within the Executive Branch. The agency is charged with coordinating the nation's intelligence activities and correlating, evaluating, and disseminating intelligence which affects national security. In addition, the CIA performs any duties relating to intelligence that the National Security Council may direct.

(U) CIA's basic organization consists of the Office of the Director of Central Intelligence (DCI) and a number of offices that report directly to the Director or the Deputy Director of Central Intelligence, as well as four directorates: the Directorate of Administration (DA), the Directorate of Intelligence (DI), the Directorate of Operations (DO), and the Directorate of Science and Technology (DS&T). CIA Headquarters is located in northern Virginia. The agency also has field sites.

(U) Purpose, Origin, and Scope of the Evaluation

(U) This report evaluates the recordkeeping policies and practices of the CIA. It has been prepared by the National Archives and Records Administration (NARA) pursuant to 44 U.S.C. 2906, which authorizes NARA to inspect the records management programs of federal agencies and recommend improvements.

(U) This evaluation focused on all aspects of the creation, maintenance and use, and disposition of records of the CIA. It was conducted by NARA staff members with the assistance of CIA staff, particularly Information Management Officers from CIA's Office of Information Technology, the Office of the Director of Central Intelligence, and CIA's four directorates. The NARA evaluators visited over 30 major program offices and a large number of their subordinate components and staff at CIA facilities both at Headquarters and in the field. The evaluators reviewed background materials, conducted interviews with CIA program and administrative staff, and examined records.

(U) Structure of the Report

(U) This report is divided into six chapters, each of which addresses a specific aspect of records management.

(U) Chapter I deals with overall program management. It addresses program objectives and responsibilities, organization and staffing, training, and internal evaluation of the records management program.

(U) Chapter II, on records creation and maintenance, discusses recordkeeping requirements, adequacy of documentation, files maintenance, the Agency Records Center, preservation concerns, and vital records.

(U) Chapter III pertains to records disposition, including the adequacy of current schedules and their implementation. This chapter also addresses subjects that are unique to CIA, such as the screening of operational files, the need to revise schedules so records are transferred to NARA sooner than when 50 years old, and the issue of security classified schedules.

(U) Chapter IV discusses the agency-wide electronic records management program, program guidance, electronic mail, and scheduling issues. This chapter also discusses certain major agency-wide systems that are now under development.

(U) Chapter V contains findings concerning records management at CIA field sites.

(U) Chapter VI discusses the management of CIA nontextual records, particularly preservation concerns.

(U) In addition, there are two appendixes. Appendix A is a list of the recommendations made in this report. Appendix B details agency follow-up procedures to the recommendations in this report as specified in 36 CFR 1220.50.

(U) CHAPTER I: OVERALL RECORDS MANAGEMENT

(U) PROGRAM REQUIREMENTS

(U) Under the provisions of 44 U.S.C. 3101 and 3102, the head of each federal agency is required to establish and maintain an active, continuing program for the economical and efficient management of the records of the agency. The program shall provide for compliance with Title 44 of the United States Code and the regulations issued thereunder.

(U) Certain elements are essential for an effective federal records management program. These include a clear definition of program objectives, responsibilities, and authorities; sufficient resources to administer the program; formal and continuing training programs for staff about records management responsibilities; and regular internal evaluations to monitor the effectiveness of the program.

(U) FINDINGS AND ANALYSIS

(U) During the early 1990s the CIA, with the exception of the Directorate of Operations (DO), severely curtailed its records management program; a number of Information Management Officer (IMO) positions were eliminated and the Office of Information Technology's (OIT) agency-wide audit program collapsed. Subsequently, two CIA Inspector General (IG) reports highlighted problems with records management in the agency. A 1992 report on the CIA's handling of the Banca Nazionale Lavorino bank scandal included an audit of DO recordkeeping. One problem area noted was that the program was significantly under-funded and there was a critical shortage of records management personnel. The second report, on OIT, issued in 1994, criticized the lack of senior management attention given to records management and the detrimental impact that this attitude conveyed to OIT. This report noted that "CIA's problems have resulted more from lack of management attention and lack of clarity in responsibility for records management than from technological gaps OIT's role and responsibility need to be recognized by other components . . . OIT itself needs to exert stronger leadership."

(U) As a result of these reports and two additional studies, one on the agency's release program in 1992 and the DCI Blue Ribbon Panel on Information Services in 1993, the agency began to revitalize and improve the information management program, initiating a renewed concern for records management on the part of high-level officials. Top-level information management positions in the DA have been created, the IMO program has been improved through some additional staffing, and the records management audit program has been reinstituted agency-wide, except in the DO where the program was not curtailed. However, as this report notes, problems still remain. Top-level management support remains critical in order for the CIA to address and resolve these problems.

(U) Current CIA records management policy issuances provide a sound foundation for the records management program by adequately defining program objectives and appropriately assigning program responsibilities, as discussed below.

(U) Program Objectives and Responsibilities

(U) When the evaluation began, guidance concerning the agency's Information Management Program was contained in an agency regulation entitled "Information and Records Management Program," dated February 1995. It established CIA's overall program with the objective of developing standards and procedures for effective, efficient, and secure information management throughout the agency. The program's goal was to ensure that the agency creates and preserves records containing adequate and proper documentation of the agency's functions, organization, decisions, and actions. This regulation also included definitions of records, nonrecord materials, personal papers, records control schedules, and information.

(U) CIA has taken the positive step of making available agency regulations, handbooks, notices, and other records management information to all employees via the Regulatory Repository Database and the Information and Records Management Database. These databases are accessible via Lotus Notes throughout the agency.

(U) CIA's "Information and Records Management Program" regulation also specifies program authority and responsibilities. The Director of Central Intelligence (DCI) is responsible for the overall creation, maintenance, and disposition of CIA records. Responsibility for agency-wide records and information management is delegated to the Directorate of Administration's (DA) Office of Information Technology (OIT). A Headquarters regulation, "Organization, Office of Information Technology" (October 1992), assigns responsibility for the agency information management program to OIT.

(U) As a result of the reports and studies noted above, two new senior intelligence service-level positions within DA were created. The Associate Deputy Director for Administration/Information Services (ADDA/IS) is the senior official responsible for agency information services, goals, and objectives, including implementing information and records services plans and policies needed to discharge the mission of the CIA. The Director of Information Management (D/IM) develops and provides oversight and planning for a corporate information, records, classification, and release management program, and serves as the agency's Records Management Officer and the Agency Archivist.

(U) Deputy directors, heads of independent offices, and operating officials are responsible for implementing program policies and procedures within their jurisdiction and designating full-time Information Management Officers (IMOs).

(U) Each of the four directorates and the DCI Area has a Directorate IMO who is responsible for establishing and directing information management programs in his or her respective directorate, including files and forms management, records preservation, electronic and vital records management, classification management, and records disposition. They also have responsibilities for conducting records management training, periodically inventorying and evaluating records, and preparing and maintaining records control schedules. The Directorate IMOs range in grade

from GS-13 to GS-15. Within the agency's offices and components, Component IMOs are responsible for implementing the agency and Directorate records programs and serve as records management consultants to agency employees.

(U) The Electronic Records Management Program Office (ERMPO) in OIT provides guidance and coordination for Directorate or Component IMOs and is directing the development of shared information systems such as the Pro-Active Electronic Records Management (PERM) system and the Space, Mail and Retirement Tracking (SMART) system. (See Chapter IV for additional information about ERMPO and the initiatives it is implementing.)

(U) "Information and Records Management Program" also assigns responsibilities to all CIA employees for classifying information properly, designating information and materials that qualify as records, separating records from nonrecord materials and personal papers, filing records in an approved agency recordkeeping system, preserving and protecting official records, and reporting any actual or threatened unlawful removal, destruction, or loss of records.

(U) During the period evaluation visits took place, the CIA revised the regulation discussed above to reflect the records responsibilities assigned to the Associate Deputy Director for Administration/Information Services and the Director of Information Management. The revised regulation, dated February 1997, also includes policies on the creation, classification, maintenance and disposition of agency records and the roles and responsibilities of the Historical Records Policy Board, the Agency Release Panel, the Agency Information and Records Management Panel, the Classification Management Review Group, and the Agency Archival Review Team. The revised regulation does not incorporate the definitions of key records management terms included in the earlier version, but the definitions are included in an appendix to an agency regulation entitled "Creation of Agency Records."

(U) The Directorate of Operations (DO) maintains many of its records in systems separate from and more centralized than the rest of the agency's systems. DO has issued directorate-specific records management guidance that incorporates guidance issued by OIT. A DO instruction entitled "Information and Records" (May 1985) addresses DO records and information policy and procedures based on agency-wide policy. Specifically, the DO instruction on information and records provides for the establishment of an information management program in compliance with both agency regulations and Titles 36 and 41 of the Code of Federal Regulations.

(U) The DO instruction identifies the program's purpose as ensuring that policies, actions, and decisions are adequately documented and that DO personnel are provided with the "exact information needed in the right place at the right time." A DO instruction entitled "Requirements for Reporting Information for Indexing" defines policy, assigns responsibilities, and provides criteria for reporting field information to CIA Headquarters for inclusion in the DO central records system.

(U) The 1992 IG audit recommended that the DO establish the position of Associate Deputy Director for Operations for Information Management (ADDO/IM), with responsibility to develop

a plan for strengthening the accountability of DO records management. The DO did not establish an Associate Deputy Director position to carry out this responsibility but did establish the position of Executive Officer for Information and Records.

(U) CIA's records management program objectives have been defined and responsibilities assigned. There are no recommendations in this area.

(U) Organization and Staffing

(U) Directorate IMOs provide overall direction for information and records management in each of the four directorates and the DCI Area. The Directorate IMOs, along with the Director of Information Management, serve on the Agency Information and Records Management Panel (AIRMP). The AIRMP provides agency-wide coordination of records policies and procedures, develops and provides guidance for any changes in the agency's records management policies or procedures, and oversees the agency-wide Internal Audit Program.

(U) The Directorate IMOs provide direction and guidance to [REDACTED] component IMOs and points of contact (POCs) who implement the records management programs in their respective organizations and serve as consultants to agency employees for information management issues. CIA Component IMOs, who range in grade from GS-11 to GS-14, are career employees who receive extensive records management training and must fulfill certain requirements established by the agency in order to be promoted.

(U) Most Component IMOs are generally assigned by OIT on a rotational basis to specific offices, then are transferred after two to three years, with the exception of Component IMOs assigned to DO. The DO has an extensive information management infrastructure with many jobs generically falling in the IMO career category. Individuals rotate into other jobs such as desk officers, managers, etc. DO believes this gives the IMOs a broader perspective when they return to the information management arena.

(U) Component IMOs work full-time on information management-related duties, including work assigned by the Directorate Information Review Officer (Directorate-level officials handling Freedom of Information Act, Privacy Act and other release matters). Some component IMOs told the NARA evaluators that they perform other duties as well. In addition to information management duties, POCs also perform program work of the office to which they are assigned that does not relate to records management.

(U) Within the DO, IMOs receive tasking from the components they support, with supervision coming from a branch in the Information Management Staff that manages the IMOs and Associate IMOs who work with the IMOs. In addition, DO IMOs work exclusively within the information management profession. While they provide support in the FOIA/PA area, other staff handle such activities as records searches and similar matters.

(U) IMOs in the Records Management Branch of OIT handle the day-to-day responsibilities of

the agency-wide records management program. These individuals coordinate a wide range of program activities including internal audits, the Vital Records Program, the development and coordination of proposed records schedules, classification management, training for IMOs, forms management, surge support to agency component IMOs when necessary, and liaison with NARA.

(U) The level of component IMO staffing varies among directorates. The DCI Area has [REDACTED] full-time component IMOs, [REDACTED] individuals who serve as both component IMOs and Chiefs of Registry, and [REDACTED] POCs with part-time records responsibilities. DI has [REDACTED] component IMOs and [REDACTED] POCs with part-time duties. DS&T has [REDACTED] component IMOs. DA has a total of [REDACTED] IMOs and [REDACTED] POCs. The DO has [REDACTED] component IMOs, many of whom also have records responsibilities for field sites.

(U) Staffing levels for records management in the CIA are above that of many agencies. Nevertheless, even to maintain current programs, it is unclear whether the levels are adequate given the nature of the IMOs' work and the potential amount of collateral work that is sometimes assigned to them. As will be discussed in Chapters II-VI of this report, CIA must greatly expand its records management efforts in such areas as scheduling electronic records, preserving both nontextual and paper records, and readying older records in all media for transfer to the National Archives. Current staffing levels are not sufficient to carry out these and other needed records management initiatives.

(U) **Recommendation I/1:** Ensure that there are sufficient IMOs in both OIT and the directorates to implement the recommendations in this report. Review workloads and staffing levels to determine whether or not IMOs should be assigned to organizations where day-to-day records management duties are currently handled by POCs.

(U) Training

(U) An agency regulation entitled "Training" states that it is the agency's policy to "promote the highest standards of performance by sponsoring training activities and by encouraging employee self-improvement." CIA records management training is offered both on-the-job by directorate or component IMOs as well as through more formal venues within the agency.

(U) A major provider of in-house formal records management training is the DA's Office of Information Technology University (OIT University), established in 1995. Its School of Information Management, in conjunction with other educational institutions in the Washington, DC, area, including the Catholic University and the USDA Graduate School, offers records management courses including files management, electronic records issues, records disposition, automated information systems, project management, advanced uses of Lotus Notes, and FOIA for Information Release Officers and IMOs.

(U) Individuals enrolled in the IMO program, with the exception of DO IMOs, are required to take certain courses through OIT (Introduction to Records and Information Management and Information Management Awareness, for example) as prerequisites to optional additional courses

(Information Development and Documentation and Electronic Records Issues, for example).

(U) The Office of Training and Education (OTE), part of DA, is the corporate CIA trainer. Although OIT University has replaced OTE as the focus for information management training, OTE still offers training that IMOs can find useful including courses on automated information systems and advanced uses of Lotus Notes. In addition, many IMOs and POCs attend NARA records management training classes, George Washington University courses, technical courses, and records management information conferences. In Fiscal Years 1995 and 1996, for example, a total of 62 CIA employees attended 10 NARA classes including Introduction to Records Management, Electronic Records Issues, and Federal Records Management.

(U) In addition to the formal records management training discussed above, a one-half day overview of the agency's records management policies and procedures is included in the two week "Entering on Duty" (EOD) briefing, attended by all newly hired employees. At the briefing employees are provided with a copy of the January 1995 publication "What is a Record?" that includes definitions of records terms, provides examples of records and nonrecord materials, and includes a brief discussion of the difference between permanent and temporary records.

(U) In addition to agency-wide training, DO provides directorate-specific records management training. For example, all DO employees, including program managers, who access the DO corporate records system must complete a computer-based training course on records policy and procedures prior to being granted access to the system. There is also a formal operational records training course available to DO employees.

(U) Although the CIA provides both formal and informal records management training, there are still problems. Program staff are not provided any additional records management training other than that received during the EOD briefing. Some component IMOs are new to their records management positions and are unfamiliar with agency records control schedules, could not locate certain files requested by the evaluation team, and did not know about the agency Vital Records Program.

(U) During discussions with program staff and IMOs, NARA evaluators found an inconsistent understanding of basic and important records management concepts. For example, as will be discussed at greater length in Chapters III and V, there was a tendency for some CIA personnel to view their files as nonrecord ("soft" files) if the information the files contained was available elsewhere. This is contrary to 36 CFR 1222.35(d) which states that "Multiple copies of the same document and documents containing duplicative information . . . may each have record status depending upon how they are used to transact agency business." It is also contrary to CIA's own internal guidance, contained in an agency regulation entitled "Creation of Agency Records," issued in February, 1997, which includes the statutory definition of Federal records and specifies that all documentary materials accumulated by the agency are records except for the three narrow categories of non-record material defined in 44 U.S.C. 3301 (library and museum material preserved solely for reference or exhibition purposes, extra copies of documents preserved solely for convenience of reference, and stocks of publications or processed documents).

(U) NARA evaluators also found that staff in some offices misunderstood the purpose of chronological (chron) files, which are normally used to file extra copies of an organization's outgoing correspondence so specific documents can be located quickly. Instead of using chron files appropriately, these offices used this short-term series for filing the only copies of significant program documentation, including incoming documents.

(U) A lack of knowledge of these and related areas could result in a failure to create, properly maintain, and preserve adequate and proper documentation of agency actions. The guidance CIA currently has in place, especially its "Creation of Agency Records" regulation and the pamphlet entitled "What is a Record," first issued in January 1995, provides clear and complete instructions concerning record status issues. Additional records management training is essential to ensure that all employees understand basic records management concepts and are familiar with the guidance contained in CIA issuances and other relevant guidance on records issues.

(U) **Recommendation I/2:** After they have completed agency-required records management training classes, require IMOs to periodically take additional training to ensure their familiarity with records issues, policies, and procedures.

(U) **Recommendation I/3:** Develop a one-day course dealing with the recordkeeping responsibilities of program staff, including the application of approved records schedules to their files and basic records concepts such as distinguishing records from nonrecord materials.

(U) Internal Audit Programs

(U) The Agency Information and Records Management Panel (AIRMP) has responsibility for oversight of the agency-wide information management audit program of the four directorates and the DCI area and decides which components are to be audited each year. To provide program guidance, policies and procedures, the agency has developed "The Auditor's Manual for the Central Intelligence Agency Information Management Audit and Improvement Program" (June 1996) which includes sample questionnaires and checklists.

(U) A project manager and two independent contractor auditors within OIT are responsible for conducting the audits and developing improvement plans that contain specified milestones and implementation reporting requirements. OIT has not yet developed criteria to determine which components will be selected. The audits focus on the three phases of the records management life cycle: creation (including adequate and proper documentation and original and derivative classification); maintenance (including filing, retrieval, and safeguarding); and disposition.

(U) Once the component-wide audit is completed, a Final Report is written that includes findings and conclusions, and contains suggested improvements. Working with the component IMO and other component employees, the auditor develops an Improvement Plan that includes a summary of solutions considered, a description of the resource impact of each recommended solution, and a schedule for the completion of all recommendations. An executive agent (usually the component

IMO) in the audited component is assigned responsibility for implementing each initiative. The IMO is required to track and provide an Audit Implementation Progress Report to the AIRMP at least three and six months after the delivery of the Final Audit Report. The report addresses progress on each improvement initiative, details current issues, lists changes to the initial recommendation, and provides a current schedule for completion.

(U) CIA's component-wide internal audit program was established in June of 1996 to replace the previous program that, because of downsizing and budget cuts, ceased to operate in 1991. Between June and December 1996, the program completed one audit, and two additional audits were begun in 1997. The program's goal is to accomplish nine audits annually. The program is structured with procedures in place to ensure the implementation of recommendations. As internal audits progress, the agency is testing its methodologies and is adjusting its policies and procedures based on experience. At the time NARA completed this evaluation, the program's effectiveness had yet to be determined.

(U) DO also conducts audits of DO offices and facilities throughout the agency which cover a wide range of information management concerns such as classification management, use and management of electronic records, and all aspects of managing and handling records in the corporate system. In addition, these audits also address DO-specific issues such as the development and implementation of emergency destruction plans. DO conducts approximately [REDACTED] records management audits per year, with a goal to inspect all of its components at least once every four years. Audit procedures and sample questions are detailed in the DO "Information Management Officer Procedures Handbook."

(U) The DO uses selection criteria such as growth in holdings, last time visited, a request for audit, Local Area Network (LAN) installation or upgrade, or certain events such as an emergency destruction to determine components to be audited. For example, as facilities prepare to convert to the LAN system, they are evaluated by DO auditors who see the LAN installation as an opportune time to inspect pre-LAN automated and textual file systems as well as to evaluate staff familiarity with LAN. Unlike the OIT audit program, the DO program does not have formal enforcement mechanisms and follow-up procedures. However, the audit report is sent to the division senior management for corrective actions.

(U) **Recommendation I/4:** Develop selection criteria for the OIT component-wide internal audits to ensure that serious records management issues and deficiencies are systematically addressed. DO selection criteria could serve as a model for developing selection criteria for OIT audits.

(U) **Recommendation I/5:** Ensure that the OIT component-wide Audit Implementation Progress Reports are received by AIRMP in a timely manner and that they address the correction of cited deficiencies.

(U) **Recommendation I/6:** Ensure that sufficient resources are allocated to allow AIRMP to reach its goal of conducting nine audits per year.

(U) Recommendation I/7: Develop a mechanism to ensure that DO audit recommendations are implemented. The OIT audit follow-up procedures can be used as a model.

(U) CHAPTER II: RECORDS CREATION AND MAINTENANCE

(U) PROGRAM REQUIREMENTS

(U) Title 44 U.S.C. 3101 requires the head of each agency to "make and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities." National Archives and Records Administration (NARA) regulations based on this requirement pertaining to the Creation and Maintenance of Federal Records are prescribed in 36 CFR Part 1222. Regulations for the Management of Vital Records are in Part 1236.

(U) An important aspect of ensuring adequacy of documentation in any information system is the clear articulation of recordkeeping requirements, as prescribed in 36 CFR 1222.32. Agency recordkeeping requirements must prescribe the creation and maintenance of records to document persons, places, things or matters dealt with by the agency; facilitate action by agency officials and their successors; make possible a proper scrutiny by Congress and other duly authorized agencies; protect the rights of the government and those affected by its actions; and document important meetings and the formulation and implementation of basic policy (36 CFR 1222.38).

(U) Furthermore, each federal agency must establish an appropriate records maintenance program so that complete records are filed, records can be found when needed, the identification and retention of permanent records are facilitated, permanent and temporary records are segregated, and permanent records are adequately protected. Such programs should, among other things, establish and implement standards and procedures for classifying, indexing, and filing records; formally specify official file locations and prohibit the maintenance of records at unauthorized locations; and standardize reference service procedures (36 CFR 1222.50).

(U) FINDINGS AND ANALYSIS

(U) Recordkeeping Requirements

(U) The CIA has developed formal recordkeeping requirements and guidance to ensure the creation and maintenance of adequate and proper documentation of agency policies, programs and actions. These are contained in a series of Agency Regulations. A regulation entitled "Information and Records Management Program--Policy," replaced in February 1997 by a regulation entitled, "Information and Records Management Program," requires CIA records to be complete to the extent required to document "accurately and completely" the policies and transactions of the agency as well as to facilitate operations, protect the financial, legal and other rights of the agency and those impacted by its actions, and to answer to Congressional scrutiny.

(U) An agency regulation entitled "Creation of Agency Records," published in February 1997, provides guidance and policy on creating agency records, distinguishing records from nonrecord

materials, and determining what records are needed to adequately document agency activities. Furthermore, all agency records are to be maintained and managed in identified agency recordkeeping systems that will ensure their preservation, facilitate their efficient and timely retrieval, ensure their security and integrity, preserve their context to provide for grouping of related records, and implement approved disposition instructions based on appropriate records control schedules. Agency boards, committees, and task forces are required to create documentation that lists names and titles of members, includes meeting dates, agendas, and lists of materials distributed, and summarizes actions discussed, decisions reached, and assignment of responsibilities. Employees and contractors are required to create records that document their activities including records of meetings, conversations, telephone calls and other forms of communication that affect agency business, policy, decision making, and commitments. This regulation also requires that contractor records documenting the agency's organization, functions, policies, decisions, procedures, and essential transactions be specified and managed as agency records. (For a discussion of electronic records requirements, see Chapter IV.)

(U) In addition to the general guidance outlined above, some handbooks, instructions, and other issuances that provide guidance for specific program functions include recordkeeping requirements. For example, within the DS&T's Office of Research and Development, the IMO has developed an R&D Project Files Contents List that identifies specific document types that should be included in a project case file including patent and royalty rights and copies of correspondence "influencing the course of action and history of the project." A DO instruction includes guidance on when and how to open files on individuals of foreign intelligence and foreign counterintelligence interest to CIA. This issuance lists the documents to be included in the files.

(U) In February, 1997, CIA issued guidance concerning the record status of e-mail messages that specifies that all such messages are presumed to be agency records unless they are clearly non-record. (See Chapter IV for additional discussion of this guidance and its implementation.)

(U) The agency is currently working on developing guidance on the maintenance of personal papers based on NARA's "Personal Papers of Executive Branch Officials: A Management Guide." The issue of CIA employees treating official records as personal papers is not a problem, however, as the sensitivity and classification of the documents preclude employees from removing them. A 1993 review by NARA of the records maintained in the Office of the Director of Central Intelligence indicated that personal papers were segregated from official files. Interviews with personnel in the DCI Area during the course of this evaluation indicated that the current situation remains the same.

(U) Adequate recordkeeping requirements are in place to ensure compliance with Federal laws and regulations. However, the implementation of the requirements varies across the agency.

(U) Implementation of Recordkeeping Requirements

(U) The agency's major intelligence gathering and dissemination operations as well as its research and development activities appear to be documented in program files. For example, the core function of the DI, the preparation and dissemination of intelligence products, is well documented in published intelligence reports and maps. Various files within DS&T, particularly research and development project files, document the development of technologies used to gather and interpret intelligence information and furnish support for clandestine operations. DO maintains files on individuals of foreign intelligence or foreign counterintelligence interest to CIA. Records on DO clandestine activities are maintained in structured project files that include sections dealing with the overall planning of the operation, administrative support activities, day-to-day operations, and the intelligence information that was acquired.

(U) Records that document important meetings are maintained in various offices. Files of meetings held by the DCI and/or the Deputy DCI include background information, meeting notes, and formal Memorandums for the Record containing a summary of the meeting and recommended actions. The Crime and Narcotics Center within DI maintains minutes of its meetings. A DS&T component responsible for open source collection maintains senior staff meeting minutes, now referred to as Corporate Board Minutes.

(U) Directorates and/or their significant components create and maintain issuances that define major policies, programs, and organizational structures. For example, the DS&T's Office of Technical Services accumulates Notices and other issuances relating to major organizational changes and policy statements. These issuances provide an in-depth explanation of the reason, circumstance, and/or decision behind the notice. The series of instructions issued by the DO contain comparable information for that directorate.

(U) The degree to which the CIA documents the formulation and overall implementation of the policies and activities to which formal issuances pertain varies among program offices. Policy and Correspondence Files in the DCI's Office document such issues as budgetary matters, clandestine operations, personnel, training, and Inspector General matters, and include correspondence from the general public. This series also includes documentation of the agency's interaction with other federal agencies such as liaison activities with the Defense Intelligence Agency and the sharing of information with other members of the intelligence community.

(U) The policies and activities of the DCI's Arms Control Intelligence Staff are well documented in the files it maintains. Likewise, minutes of meetings held by the DA's Agency Information and Records Management Panel fully document its key actions, while documentation on the evolution of the agency training programs can be found in minutes of a steering group that is part of the Office of Training and Education. DI's Crime and Narcotics Center is also particularly attentive to the need to document its activities through the creation and maintenance of intelligence reports. A DS&T component responsible for open source collection documents policy and senior-level decision-making in logs and briefing books.

(U) As required by agency regulations, records created and maintained by contractors are considered to be government records subject to both CIA and federal records management policies and procedures.

(U) NARA did, however, find instances where adequate and proper documentation seem to be lacking. Within DS&T's Office of Research and Development, little office-level program documentation is maintained beyond that which is in specific R&D project files. DI's Office of Weapons, Technology and Proliferation has not maintained policy or reorganization files for the last two years.

(U) It is difficult to extrapolate findings in specific offices to the agency as a whole. CIA's formal guidance is adequate. The challenge facing the agency is ensuring that this guidance is fully disseminated and properly implemented.

(U) **Recommendation II/1:** Ensure that employees, including deputy directors and other high level decision makers, are aware of requirements in federal law and regulation to document and maintain in appropriate files all important policy and decision-making actions, including those discussed via electronic mail (e-mail) or during telephone conversations. E-mail communications that meet the definition of records should be retained in a recordkeeping system. Telephone conversations should be documented through Memorandums to the File.

(U) **Recommendation II/2:** Ensure that employees follow CIA guidance requiring the creation and maintenance of files to document agency activities.

(U) Files Maintenance: Guidance

(U) The CIA's policies and procedures for maintaining records are clearly outlined in agency regulations. An agency regulation entitled "Maintenance of Agency Records," issued in February 1997, requires records to be maintained in recordkeeping systems and in a retrievable and readable format throughout their life cycle, regardless of media. Records not covered by records control schedules or the GRS are to be maintained as if they were permanent records until scheduled. Records on transient media (e.g. thermal faxes and diskettes) must be copied to a more durable medium before filing into a recordkeeping system. Electronic records are to be backed up regularly. Permanent micrographic, audiovisual, and electronic records are to be maintained in accordance with federal regulations.

(U) Files Practices

(U) CIA files appear to be generally maintained in ways that make the information accessible so employees can conduct agency business. DS&T Research and Development (R&D) project files, which comprise the vast bulk of DS&T's records, are in excellent condition and contain the information necessary to document the project. OTS Notices are arranged by announcement number and are cut off at the end of the year. Files of the Deputy Director for Operations and his principal assistants are arranged by subject and each document has an individual registry number

to facilitate tracking in a database. Publications maintained by the Office of Current production and Analytical Support (CPAS), including *National Intelligence Estimates*, *Economic Intelligence Weekly*, and *National Intelligence Council Memoranda*, are numbered within each calendar year and indexed by number and subject. Maps held by a DS&T component responsible for open source collection are catalogued. To identify different categories of records so they can be more easily accessed, the DO has established a dedicated color scheme for file folders and index cards associated with its principal file series, which is used throughout the Directorate.

(U) Some CIA components have developed office-specific filing systems to fit their needs. For example, the Office of Congressional Affairs within DCI breaks down its series of Congressional Notifications into several subseries. DI's Crime and Narcotics Center maintains copies of certain final products in two separate arrangements to facilitate use. Additionally the DI has created a numbering system for intelligence publications that facilitates reference use. Course-related materials maintained by DA's Office of Training and Education are arranged by course title. The DO has a filing system that is used by employees throughout the Directorate.

(U) In order to establish consistent, agency-wide filing practices, in 1995 the CIA promulgated an agency-wide "Agency File Guide," jointly developed by the Director of Information Management and the Office of Information Technology, to define a recommended scheme for information filing. This guide is intended to expedite information retrieval, reduce information storage requirements, minimize training costs since users will not need to learn a new filing system when moving to a different office, and result in greater compliance with records disposition schedules. Intended to be used to manage records in electronic systems when the CIA becomes a paperless agency, the filing guide is also applicable to textual records until that time.

(U) The guide contains templates for organizing information according to a consistent, well-defined structure. It identifies agency-recommended file tags or labels for records to be used on either file folders or electronically in directories. It provides five levels of filing and includes directorate specific systems and series. Tags are included for general administrative files (e.g., personnel records and policy and regulation files) and program-specific files. Also included are disposition instructions and citations to records control schedules.

(U) The guide is currently undergoing review to ensure that it is current, accurate, and complete. Once it is fully implemented throughout the agency, its success can be measured through an internal audit.

(U) **Recommendation II/3:** Monitor the implementation of the "Agency File Guide" to ensure that it is effective and meets the needs of the directorates.

(U) Indexing and Tracking

(U) In order to ensure that records can be located, offices use various methods such as databases, bar coding, and other automated indexing and retrieval systems to control and track records, but with mixed results. Some methods used to track documents work well and the location of files is

easily identified. [NOTE: Seven lines of this paragraph are security classified and have been removed from this unclassified version of this report.]

(U) There are problems, however. In some offices, records are not closely tracked and sometimes cannot be located. For example, staff in the DI's Office of Weapons, Technology and Proliferation indicated that a permanent policy file had been charged out for more than one year to the agency's History Staff. The historians, in turn, could not locate the file. Within a branch of the DI's Office of Support Services, several manual index systems are used to control one collection and not all employees are adequately familiar with them. The retrieval of DS&T research and development project files was traditionally dependent upon the subject area expert or contracting officer's technical representative (COTR) as institutional memory about the location of the records. A 1985 audit report recommended the creation of a database to track DS&T research and development projects and thereby provide a way to more efficiently retrieve information. This database was only implemented in 1997.

(U) The DO uses an indexing system to maintain and reference its files on individuals of foreign intelligence and foreign counterintelligence interest. The files contain information sent to CIA Headquarters from the field. This information is transmitted initially to DO Desk Officers who are responsible for ensuring that the information is entered into its indexing system, based on guidance contained in a DO instruction. However, there is a backlog of indexing information to be entered into the system. NARA was told that this inhibits the timely retrieval of information needed for current operations.

(U) **Recommendation II/4:** Ensure that adequate indexes are created where necessary and that staff who need to use them have familiarity with them.

(U) **Recommendation II/5:** Require the timely creation of indexing information concerning individuals of foreign intelligence or foreign counterintelligence interest following guidance in the existing DO instruction.

(U) The Agency Records Center (ARC)

(U) Because of security considerations and the need for 24 hours a day retrieval capabilities, the CIA does not use NARA federal records centers for storing inactive records. Rather, since the early 1950s, CIA has utilized an agency records center. During the 1970s, CIA obtained NARA approval to establish a records center as required by 36 CFR 1228, Subpart K.

CIA schedules call for the retirement of records to the Agency Records Center (ARC) after they become inactive, except for short term series that are destroyed on-site. In general, CIA offices,

including the DO, retire files to the ARC as called for. However, the DO maintains in its own offices most closed files on individuals of foreign intelligence and foreign counterintelligence interest in order to speed retrieval when files are needed.

(U) The ARC is organizationally part of OIT's Customer Services Group. Its staff carries out the basic records center services of accessioning records, providing reference service and destroying records when their retention period has expired.

(U) The ARC maintains an automated system containing information concerning each individual accession ("job"). The ARC database includes detailed information at the file folder level for each accession retired after 1978, including the job number, box and file number, file title, level of security classification, inclusive dates, and disposition instructions, including date when disposition action will be taken. Less detailed information is maintained for accessions retired before 1978.

(U) Because of security considerations, ARC staff cannot systematically inspect each incoming shipment of records to ensure that records are packed properly and that the paperwork prepared by the office of origin describes the files correctly. Access to some retired records is limited to staff of the retiring directorate or component. Access restrictions imposed on the ARC staff are of particular concern because directorate and component IMOs are sometimes unable to examine records prior to retirement due to responsibilities unrelated to records management. (However, the IMOs in two branches in the DO do review all accessions prior to their retirement to the ARC.) A thorough review of records by IMOs prior to retirement to the ARC or as part of the ARC accessioning process would catch such problems as files packed upside down in cartons, the application of incorrect disposition authorities to records, the intermixing of permanent and temporary records, and files in need of preservation action, all of which NARA evaluators observed during visits to the ARC. CIA regulations call for the use of acid free folders for permanent records. Reviews of records would ensure compliance with this requirement.

(U) The ARC handles more than 100 reference requests a day. IMOs recall files from the ARC on behalf of the components they serve using an automated system. ARC staff are able to respond very quickly to the overwhelming majority of these requests. The current system will soon be replaced with a new system, the Space Management and Retirement Tracking (SMART) system. Through bar codes, SMART will enable CIA to control records at the document level (see Chapter IV for additional information concerning SMART, a sub-system of which was implemented in July, 1997).

(U) The ARC destroys temporary records whose retention period has expired. See Chapter III for a more detailed discussion of the ARC's records disposition procedures.

(U) **Recommendation II/6:** Inspect new accessions retired to the ARC to ensure that records are scheduled properly and to identify any preservation problems and needs, including compliance with CIA regulations concerning the use of acid-free folders for permanent series. This review can either be conducted by component IMOs prior to shipment of records or by ARC staff as part of

the accessioning process.

(U) Preservation Concerns

(U) Agencies are responsible for preserving the records they create until they either are destroyed in accordance with a NARA-approved schedule, or, in the case of permanent series, transferred to NARA legal custody. The preservation of CIA records is of particular concern to NARA because the proportion of permanent records is higher than is the norm for most federal agencies and because CIA maintains records in its physical and legal custody for a long period of time, approximately 50 years.

(U) Because most inactive CIA records eventually are retired to the Agency Records Center (ARC) and remain there for many years, preservation issues affecting agency records are particularly pronounced at the ARC. Most of the records in the ARC are paper based (see Chapter VI for a discussion of special records, including preservation concerns). The environmental conditions in the ARC appear adequate, particularly for textual material. During one evaluation visit, the relative humidity was 42 percent and the temperature was 72 degrees Fahrenheit in the part of the ARC used for paper records but on another visit, a temperature of 68 degrees, with 58 percent humidity, was noted. Conditions at the ARC appear to meet basic storage standards for paper records. NARA is concerned, however, that with seasonal fluctuations, humidity levels could move into unsatisfactory ranges.

(U) In the course of the evaluation, NARA noted preservation problems with older records stored at the ARC despite the generally adequate storage environment. Problems also were noted when records still in office space were examined. In the main, the preservation problems NARA identified stem from the fact that CIA maintains records in its custody for a very lengthy period of time. As a result, CIA holds files from the 1950s-1970s that include documents created on inherently unstable media, such as thermofax copies and certain types of mimeographs. The danger that valuable information will be lost is increased by the fact that ARC staff do not have full access to the records and cannot identify preservation needs on a systematic basis by reviewing older holdings and newly arrived accessions. Likewise, IMOs are generally unable, because of other responsibilities, to systematically review records and take preservation actions. Some IMOs, such as the IMO for a communications office in the DA, do review permanent files that have been recalled from the ARC and copy deteriorating mimeographs and thermofax, and two DO employees work in the ARC on records preservation. This, however, is the exception and not the rule.

(U) CIA regulations call for housing permanent documents in acid-free folders. However, some offices have not followed this guidance. Thus, when OIT personnel conducted a survey of 24 accessions of DA records retired as permanent to the ARC, they found that acidic folders were used in all but three.

(U) To deal with preservation concerns, OIT has initiated a project to review permanent accessions at the ARC, particularly those retired by DA components. To date, this review has

determined that a high fraction of "permanent" accessions were, in fact, covered by temporary disposal authorities. This project is a positive development and should be continued. Its dual focus-- verifying that permanent retirements are, indeed, archival and identifying and correcting preservation problems-- is appropriate. If, because of security considerations, ARC/OIT personnel cannot review certain records, personnel from the retiring directorate should be trained to carry out this important activity. If offices maintain older permanent records in their custody in lieu of retiring them to the ARC, those holdings should also be reviewed for preservation needs and to ensure proper scheduling. As is discussed further in Chapter III, this effort should be done in close coordination with NARA and should also be used as an opportunity to determine if CIA components have consistently retired and/or maintained permanent records in accordance with approved schedules.

(U) If CIA continues to retain permanent records for a lengthy period of time, it must assume greater records preservation responsibilities. Most of the oldest CIA holdings are stored at the ARC. Unless CIA agrees to transfer permanent files to NARA well before they are 50 years old, which is the current standard, the agency and particularly the ARC must take on preservation activities that are normally associated with archival repositories.

(U) **Recommendation II/7:** Continue and extend the ARC preservation project. Implement a preservation project for older records held in locations other than the ARC.

(U) Vital Records

(U) 36 CFR Part 1236 provides for the selection and protection of vital records required in the development and implementation of federal agency emergency preparedness and recovery programs. The categories of vital records include emergency operating records, required for the continual functioning of an agency, and legal and financial rights records, required to preserve the legal and financial rights of individual citizens and of the government.

(U) The CIA's Vital Records Program was established in 1974 by a Headquarters regulation entitled "Vital Records Program." The Headquarters regulation "Records Management" assigns management responsibility for vital records to the Records Management Program with the agency's records officer as the official responsible for providing program guidance. "Vital Records Program" defines the program and requires annual audits of vital records to assess their physical condition and to determine if they are up-to-date. Component IMOs are responsible for implementing the program.

(U) Each component has identified its vital records and listed them on vital records schedules. These schedules also include information on the type of record media, appropriate disposition instructions, and frequency of retirement to the Agency Records Center (ARC), the officially designated agency Vital Records Repository.

(U) In addition, the DO has a Vital Records Program (promulgated by regulation) [NOTE: Two and a half lines of this paragraph are security classified and have been removed from the

unclassified version of this report.]

(U) Despite the published vital records guidance and established policies and procedures, the attention the CIA has given to its vital records program has decreased in the past two decades, resulting in problems with the program. There has been no testing to determine if records are easily retrievable, if all equipment needed to read the records is available, and that system documentation is adequate to operate any system containing vital records as required by 36 CFR 1236.24. Few IMOs that the evaluators interviewed could locate their copies of Vital Records Program or vital records schedules.

(U) Recently the agency has begun addressing these problems. In order to ensure that the Vital Records Program is in compliance with current Federal regulations, the CIA is developing a new "Vital Records Handbook" that will include guidance on identifying vital records in different media, with a particular emphasis on records maintained in electronic systems. In addition, IMOs have reviewed the 30 year old vital records in the ARC to determine which ones are no longer relevant. They have also begun identifying more recent records that should be identified as vital records. In order to emphasize the agency-wide vital records program, agency officials recently lectured at OIT University on the importance of a viable Vital Records Program and the CIA has requested and received a number of copies of the NARA instructional guide, "Vital Records and Records Disaster Mitigation and Recovery."

(U) Recommendation II/8: Continue the recent initiatives to revitalize the Vital Records Program. Ensure that the "Vital Records Handbook" is disseminated upon completion, and that IMOs continue reviewing older vital records in the ARC and identifying more recent vital records.

(U) Recommendation II/9: Consider conducting a mock emergency preparedness drill to ensure that, in an emergency, records are easily retrievable, all equipment needed to read the records is available, and system documentation is adequate to operate any system that contains vital records.

(U) CHAPTER III: RECORDS SCHEDULING AND DISPOSITION

(U) PROGRAM REQUIREMENTS

(U) Each Federal agency, in accordance with 44 U.S.C. 2904, 3102, and 3301, and 36 CFR 1228, is required to establish and maintain a records disposition program to provide for the timely disposal of records designated as temporary and to provide for the identification and transfer to the National Archives of records designated as permanent. Clearly written, up-to-date, and properly implemented comprehensive records disposition schedules that have been approved by NARA and that are binding upon the agency form the basis for a sound records disposition program.

(U) In accordance with 44 U.S.C. 2107(2), the Archivist of the United States may direct the transfer of records 30 years or older to the legal custody of the National Archives, unless the head of the agency certifies in writing that they are needed for current business. No records may be transferred to any other federal or state agency, donated to a public or private institution, or given to an individual without NARA's approval. Permanent electronic and audiovisual records should be transferred to the legal custody of NARA as soon as possible in light of their fragility and special preservation needs.

(U) FINDINGS AND ANALYSIS

(U) CIA Regulations

(U) An agency regulation entitled "Disposition of Agency Records," issued in February 1997, mandates the disposition of records in accordance with NARA-approved schedules and the eventual transfer of permanent records to NARA custody. Component IMOs are responsible for bringing to OIT attention any records their organizations accumulate that are not scheduled and for incorporating new General Records Schedule (GRS) items into agency schedules within 6 months of issuance (or disseminating them by other means). This guidance also specifies that unscheduled series must be preserved as permanent records until NARA has approved their disposition and holds all managers responsible for ensuring that records under their control are disposed of properly. The "Disposition of Agency Records" regulation expands the guidance included in older regulations and provides a firm foundation for an effective disposition program.

(U) The DO has also issued guidance (an instruction entitled "Disposition of Inactive Files," dated November 1990, and a DO instruction entitled "Records Management and the Law," dated September 1995) that requires its staff to follow NARA-approved schedules. In addition, an agency-wide Information Management Handbook that OIT is currently drafting will include guidance concerning records disposition.

(U) CIA Schedules

(U) Since CIA's establishment in 1947, NARA has approved approximately 120 separate agency

schedules. Between 1948 and 1974, CIA submitted 43 schedules containing ca. 200 series, only two of which were permanent. Most CIA records are covered by schedules prepared and submitted between 1975 and 1977. During that period, CIA submitted 30 schedules containing in the aggregate ca. 2500 items. Each of these schedules covered records accumulated by a specified CIA organizational unit (either an entire directorate or major office) and its components. These schedules were comprehensive, encompassing overall policy type records, program files accumulated in connection with the creating organization's distinctive mission, and routine housekeeping records, including series covered by the GRS. As a result of CIA's 1975-1977 scheduling effort, NARA estimated at the end of 1977 that 95% of all agency records were covered by approved schedules, including 350 separate series which were designated as permanent.

(U) Since 1977, CIA has submitted approximately 45 schedules to NARA. These submissions contain a total of ca. 650 items. Most of these jobs were submitted in FYs 1978-1984 to update the organizational schedules approved between 1975 and 1977, primarily by modifying the retention periods of series already approved for disposal.

(U) In FY 1985, CIA submitted and NARA approved an agency-wide schedule (NC1-263-85-1) that standardized the disposition instructions throughout the agency for many key "generic" series that all or most agency components accumulate. This schedule included such permanent series as organizational records and general policy files, planning documents, periodic activity reports, directives, committee and task force records, R&D project files, and certain training materials as well as temporary records, including policy and planning files accumulated below the "office" level, fiscal records, chronological (chron) files, working papers, and reference files.

(U) Most schedules approved after 1985 are small and deal with textual records accumulated by individual CIA components (as opposed to series common to many organizations). Three schedules submitted between 1988 and 1990 include in the aggregate ca. 60 temporary electronic systems relating to logistics, training, and fiscal matters; most of these systems document housekeeping activities and were approved for disposal in the GRS. A 1993 schedule provides for the permanent retention of electronic records that document key mission related activities of the DS&T component responsible for open source collection. However, this schedule is very much an exception. The other electronic records CIA accumulates in carrying out its core functions remain unscheduled (see Chapter IV of this report for a more detailed treatment of this issue).

(U) Classification of CIA schedules

(U) When the CIA initiated its substantive scheduling effort in the mid-1970s, because of security reasons, the schedules the agency submitted to NARA provided only series titles and disposition instructions. These schedules, which were initially unclassified, did not include descriptions of the records. CIA maintained full text classified schedules containing series descriptions, which were available for review by NARA appraisers on-site at the agency. In 1981, CIA determined that the skeletal schedules in NARA custody were confidential in the aggregate. Most schedules submitted from 1981 to 1993 contained only series titles and were classified at the confidential level.

(U) In 1993, NARA determined that the *Federal Register* notice requirements added to the Federal Records Act in 1984 mandated the submission to NARA of some descriptive information that could be released to the public concerning CIA records proposed for disposal. The schedules CIA has submitted since then are unclassified and contain fuller descriptions of the records than earlier submissions. As in the past, CIA maintains more detailed schedules on-site which are security classified.

(U) The classification of CIA schedules in their entirety is at variance with the practice of most other intelligence community agencies, which have been able to prepare unclassified schedules that adequately describe most of their records. CIA practice is particularly questionable since the information in schedules pertains to the broad subjects of records, not specific operations or issues. Furthermore, Privacy Act notices containing descriptions of many items included in CIA's classified schedules have already been published in the *Federal Register*. Thus, the fact that the DO accumulates personality, project, and operational interest files is already in the public domain. Likewise, the CIA has broadly disseminated the Soviet estimates it prepared during the Cold War but the broad, generic description of these records included in agency schedules is classified.

(U) The classification of most CIA schedules in their entirety is not warranted and serves only to create misperceptions and arouse suspicion. Furthermore, the maintenance of two versions of each schedule, a skeletal version and one that is full text, makes the processing of CIA submissions more time-consuming and makes it difficult for NARA to monitor implementation since the same series may have different item numbers in each schedule.

(U) **Recommendation III/1:** Review full text and skeleton schedules for declassification; provide full text schedules to NARA even if portions are security classified.

(U) **Dissemination of Schedules**

(U) CIA's agency-wide records management staff in OIT maintains a complete set of full text CIA schedules. Directorate and subcomponent IMOs and POCs maintain copies of the schedules that pertain to their directorate. These schedules include items drawn from directorate-specific schedules approved by NARA as well as generic items drawn from NC1-263-85-1. Also incorporated are disposal authorities for housekeeping records derived from the GRS.

(U) CIA also distributes the GRS. However, it appears that some components, including the ARC and the DI, have not been provided with the most current edition. In a visit to the ARC, the NARA evaluation team asked for a copy of the GRS and received the long superseded 1982 version. Similarly, input for the Agency File Guide provided by the DI cited as the disposition authority for R&D records a general schedule which NARA rescinded in 1988. CIA's recent decision to make the GRS accessible on-line within the agency is a positive step. However, CIA must ensure that if there is a need to disseminate the GRS, as opposed to incorporating it into agency schedules, the copy that is available is up-to-date.

(U) Adequacy of Current Schedules

(U) Despite their age, the CIA schedules NARA has approved over the years for textual records cover the vast majority of the paper files held by the CIA offices NARA visited. A few offices, however, accumulate textual records that do not appear to be covered by approved schedules. These unscheduled records include Crime and Narcotics Center minutes, a series to which CNC applies the disposition authority for another series (albeit one that provides for the preservation of the records), and several series of finding aids for the intelligence documents collection maintained by a branch within the DI's Office of Support Services.

(U) A serious issue pertaining to the currency of CIA schedules is the fact that, as noted above, few electronic systems accumulated in connection with CIA's basic mission are covered by NARA-approved schedules even though CIA offices increasingly create and maintain their basic records in an electronic format. In many instances, paper copies of electronically-prepared documents, such as finished intelligence products issued by the DI, are still produced and retired in accordance with approved schedules. However, this may not always be the case so the fact that CIA schedules adequately cover paper records will not ensure the preservation of significant information that is maintained solely electronically. Some examples of instances where key records are now maintained electronically are provided below in the discussion of schedule implementation.

(U) Overview of Schedule Implementation for Textual Records

(U) NARA evaluators visited approximately 50 offices where the creation, maintenance and disposition of textual records was a primary focus of the visit. In most of these offices, the disposition of paper records was carried out in accordance with NARA-approved schedules. However, given the size and complexity of the CIA, it is difficult to extrapolate findings concerning schedule implementation in these offices to the agency as a whole. It is, nevertheless, clear that schedules do not reflect the degree to which CIA maintains significant record types in an electronic format and, consequently, there is a danger that important information will be lost.

(U) NARA is also concerned about other problems noted in office visits, particularly the misuse of the chronological files designation and the tendency observed in some offices for staff to view files as non-record simply because the information they contain is maintained in other locations. Given the importance of the records CIA generates, any improper disposition practices could result in the loss of significant documentation, even if such practices are the exception rather than the rule. Specific findings are provided below.

(U) At the highest level of the CIA, records of the Director, Deputy Director, and Executive Director are covered by schedules that provide for the permanent retention of substantive policy and correspondence files, meeting files, speeches, and schedules of daily activities. A 1993 special study which NARA conducted revealed that CIA was applying these schedules properly. In the summer of 1997, NARA made a return visit to the DCI area and confirmed that records continue to be handled in an appropriate fashion.

(U) Records that document the CIA's production of finished intelligence are also covered by NARA approved schedules that appear to be implemented properly. A copy of the President's Daily Brief (PDB) is systematically retired as a permanent record to the ARC by the staff responsible for its preparation, which is part of the DI. The current schedule for this series calls for the permanent retention of CIA's "stayback copy" of the PDB, but if the President returns an annotated copy, it is to be retained in place of the "stayback copy." In practice, CIA retains as permanent both the "stayback copy" of each PDB and the copy reviewed by the President, whether annotated or not. The schedule should be revised to reflect this.

(U) The ARC also holds papers related to the PDB accumulated prior to 1993, such as the memorandums, termed feedback notes, prepared by briefers that contain information concerning the reactions and questions raised by the President and other high level officials. However, the staff does not retain copies of memos that document planning for upcoming issues (though copies are sent to higher echelon offices). In addition, feedback notes are no longer maintained in paper and retired to the ARC but instead are created and maintained electronically. Likewise, proposed input for the PDB prepared by other DI offices is now provided electronically to the PDB staff and is retained there for only one month.

(U) Other DI serial intelligence products, which include National Intelligence Estimates (NIEs), the Economic Intelligence Weekly (EIWs), and the National Intelligence Daily (NID), are also systematically retired in paper format to the ARC for permanent retention. However, these records are also maintained electronically and it is not clear if all versions and background materials that should be retained are being preserved. An analogous situation was noted at the National Photographic Interpretation Center (NPIC), which, at the start of FY 97, was transferred from CIA's DS&T to the newly formed National Imagery and Mapping Agency. The master copies of the hard copy reports NPIC analysts prepare based on imagery acquired from U.S. overhead reconnaissance activities are retired to the ARC for permanent retention. However, it is not clear if copies of all reports that are generated and distributed electronically are also being captured as permanent records.

(U) DS&T's component offices maintain as permanent records notices and similar issuances that establish and explain policies and procedures. The Office of the Director of the DS&T component responsible for open source collection also accumulates logs and log notes that document the component's policies. These records are permanent. Until recently these logs were printed out. However, this is not current practice.

(U) The bulk of the permanent textual records DS&T offices maintain are R&D project files, which are covered by approved schedules that appear to be implemented properly. DS&T also has an active history program that has produced studies that cover the Directorate, from its establishment in 1963 through 1989; a study for the period to 1995 is currently being prepared. Completed histories and related background documentation have been preserved and retired in accordance with the schedule. Some background files, however, include an intermingling with textual records of sound recordings and photographs, which should be maintained separately to

ensure their preservation.

(U) Schedule Implementation in the DO¹

(U) Because of the significance of the DO, NARA paid particular attention to its files. Notices, handbooks, and other issuances that define overall policies and procedures are maintained as permanent records in the office responsible for their preparation. For each such issuance, there is what DO terms a policy and management file, which is a permanent series. High level subject files maintained for the DDO, CIA's Deputy Director for Operations, and his principal subordinates (the Assistant Deputy Directors, ADDOs) are arranged in accordance with a long-standing alpha-numeric filing scheme and contain a wealth of substantive information concerning a wide variety of topics.

(U) DO files on individuals of actual or potential foreign intelligence or foreign counterintelligence interest to the CIA are approved for sampling in accordance with a schedule approved by NARA in 1977. This schedule calls for the retention of significant files and the eventual disposal of the remainder. Because of other demands on resources, DO is only reviewing and destroying files on persons in whom there never has been active interest by CIA. This disposal is in accordance with the approved schedule. This schedule contains only a skeletal summary of the selection criteria for permanent records. The full criteria were briefly reviewed by NARA during the evaluation. While they appear adequate, NARA should be afforded an opportunity to review these criteria in detail so it can determine whether or not they warrant revision.

¹During the spring of 1997, it was reported in the media that documents pertaining to CIA operations in Iran in 1953 were destroyed during the 1960s and that certain records relating to other covert actions in the 1950s and 1960s also may have been disposed of. In accordance with federal regulations, NARA requested a report from CIA as to what records were destroyed, when destruction took place, and what disposal authority covered any materials that were destroyed.

In response, the CIA reported that records relating to the Iran covert action were destroyed between 1959-63 and consisted of working files and other records eligible for disposal in NARA-approved schedules, including the General Records Schedules. NARA, however, has concluded that no schedules in effect during the period 1959-63 provided for the disposal of records relating to covert actions and, therefore, the destruction of records related to Iran was unauthorized.

CIA also reported that no records relating to other major covert actions carried out during the 1950s and 1960s were destroyed improperly, noting that NARA-approved schedules authorized the destruction of working files, reference materials, and other temporary records. NARA agrees that schedules approved after the initiation of CIA's major scheduling effort in the mid-1970s, particularly the schedule in effect from 1977-89, provided CIA with the authority to destroy a wide variety of records relating to operational activities. However, the information CIA provided concerning the disposal of records relating to covert actions other than the Iran operation was not sufficient to allow NARA to determine whether or not any records were destroyed improperly.

(U) Screening of DO Operational Files

(U) DO also accumulates files on organizations in which CIA has a foreign intelligence or a foreign counterintelligence interest; general subject files on activities of intelligence interest, which are referred to as Operational Interest or OPINT files; and files on intelligence operations, which are termed Operational Activity (OPACT) or Project files. OPINT files are approved for selective retention while the basic files on each operational activity are permanent. At specified intervals, the DO reviews both series prior to their final disposition. The latter activity includes the screening of OPACT files to remove and destroy documents that are duplicate and/or non-record and the review of disposable OPINT files to identify and retain documents of continued interest to CIA. Because of the significance of the records, extended discussion of this process is warranted.

(U) The DO's screening activities are carried out by DO annuitants who work on behalf of a specific DO component, usually the one in which they served during their career in the DO. As they begin work as reviewers, annuitants are provided with a three day course on DO records and recordkeeping practices. However, they are trained primarily on-the-job by supervisory personnel who work closely with new staff.

(U) Screening files is consistent with N1-263-87-2, the DO schedule approved by NARA in 1989. Item 3a of this schedule calls for the permanent retention of all Project Files, including documents relating to their objectives, development, and implementation. Item 3b, however, authorizes CIA to review Project Files and destroy duplicates and other non-record material when no longer needed. Similar disposition instructions apply to Operational Interest Files.

(U) NARA reviewed several sample files, including documents from two files which DO reviewers had earmarked for disposal. Materials screened out as temporary consist primarily of copies of intelligence reports, which are retained permanently in another series, and routing slips that do not contain substantive information. Other temporary materials include routine administrative papers that are not deemed necessary to document the subject of the file as well as transmittal memorandums for attachments filed elsewhere and reference material relating to the main subject of the file that is readily available in other records.

(U) Removing materials of this sort can result in substantial reductions in the volume of individual files, down to only a small fraction of their original size in some cases. However, based on the samples examined and the explanation of the process provided by DO staff, it does not appear that the DO's screening activities are resulting in the disposal of significant documents. DO staff insist that reviewers err on the side of preservation when there is any question as to whether documents should be retained. Reviewers are also encouraged to consult with the agency's History Staff in such instances.

(U) NARA is nevertheless concerned that the DO has not developed any written screening criteria for reviewers to use. This could result in the improper disposal of valuable records, especially since the wording of the relevant schedule items is extremely broad and imprecise. NARA is also

concerned that some of the materials typically screened from files are not, strictly speaking, duplicate or non-record but instead are records. Even if documents pertaining to routine administrative matters may not warrant permanent retention, they are records that may be disposed of only in accordance with a NARA-approved records disposition schedule.

(U) At the very least, a revised schedule for operational records that provides more specific guidance regarding the types of materials to be screened out is in order. CIA recognizes this and has asked for NARA assistance in developing updated disposition instructions for these records. In implementing this project, NARA will re-evaluate the screening of these records as it has traditionally been carried out by DO staff. NARA's review will address whether the benefits of screening as it is now carried out outweigh the advantages of retaining operational files intact or limiting screening to multiple copies of the same document and other materials that clearly are valueless. Destroying the copies of intelligence reports included in operational files may make research cumbersome for those interested in specific operations, even if the reports are available in other files. In addition, these reports and the other documents that are typically screened out of the files may add contextual information to the documents that typically are retained. As a result, screening may decrease the overall value of the series even if the documents removed from files lack value individually.

(U) After a revised schedule is approved, it should be used as the basis for written guidance to those who review operational files. This guidance should be included in the three day training that newly rehired annuitants are given and explained to those already on-board.

(U) **Recommendation III/2:** Submit schedules for all unscheduled series, including series where records are now maintained electronically, particularly permanent series where paper documents are no longer printed out and filed.

(U) **Recommendation III/3:** Ensure that all staff are familiar with the schedules that cover the records they accumulate.

(U) **Recommendation III/4:** Work with NARA in the development of a revised schedule for DO operational project files; use this schedule as the basis for written guidance that is provided to those who review and/or process older operational files.

(U) Working Papers and Chronological Files

(U) Two other problem areas were noted in some of the offices visited. The more serious and common of the two was a tendency on the part of some staff and/or agency components to inappropriately regard their files as non-record working papers or "soft" files that could be destroyed at will. A second problem NARA noted was the filing of incoming documents and other materials in disposable chronological files. Each of these is discussed below in more detail.

(U) Working Papers

(U) CIA offices and individual agency staff members accumulate such transitory materials as copies of documents used for convenience of reference, rough notes and drafts that were not circulated and contain no unique information of continuing value, and materials of an ephemeral nature, such as memos that change the time or place of meetings. These materials need not and should not be retained after their purpose has been served.

(U) Staff should be aware, however, that working files are records and may contain documents that warrant retention in order to ensure adequate and proper documentation of agency policies and actions. Documents falling into this category include but are not limited to drafts that were circulated for review and approval, intra-office memorandums that result in substantive changes to reports and other issuances, and notes taken at meetings that are the only documentation of what transpired. Staff should be made aware of the record status of working papers.

(U) During evaluation visits, NARA observed that in some offices staff regard working files as non-record material to be disposed of at will. In some cases, this may not pose a serious problem. For example, as will be discussed at greater length in Chapter V, the files on specific operations and individuals accumulated at the CIA field sites NARA visited appear to be duplicates of files maintained at Headquarters. However, in other instances treating working papers as non-record materials that are invariably destroyed could lead to the inadvertent destruction of permanent files. For example, in the Office of Weapons, Technology, and Proliferation, an important document pertaining to a major office reorganization was located in a working file. This may be due to the improper use of the working paper designation. This office had not identified any permanent policy files for the past two years. In the DO office which maintains files on individuals and organizations of foreign intelligence and foreign counterintelligence interest to CIA, staff noted that on occasion they receive documents for filing that were found in the working files of DO desk officers who have left the agency or moved on to other assignments.

(U) NARA also noted a few instances in which an office viewed its files as non-record working papers because another office had primary responsibility for the matters to which their files relate. A DS&T component responsible for providing certain clandestine services regards requests for assistance as non-record working files because the information is preserved electronically and is also available in DO files. The office also regards as non-record work papers the files accumulated in connection with its participation in an intra-agency team because another office maintained the team's permanent records.

(U) CIA already has published guidance in place that adequately addresses the status of working papers. Nearly all of the organization-specific schedules CIA submitted in the 1975-1977 period contained items authorizing the disposal of working papers. These authorities were consolidated and standardized in Item 18a of Disposition Job NC1-263-85-1, the generic, agency-wide schedule NARA approved in 1985. This schedule item covers working papers and duplicates of documents and miscellaneous papers not covered elsewhere and calls for the annual screening of these files. After screening, duplicate and transitory information may be destroyed. However,

substantive documents are to be placed in the appropriate official file.

(U) The agency regulation entitled "Creation of Agency Records," issued in February, 1997, specifically addresses working papers. Paragraph 2b(2)(a) specifies that drafts and working papers at the Deputy Director level will be filed in recordkeeping systems. At lower levels, drafts and working papers that were coordinated outside the unit of origin or contain information documenting substantive policy development, actions, or decision making are also to be filed in recordkeeping systems with the final version of the document to which they relate. The only working papers that need not be filed in a recordkeeping system are those accumulated below the Deputy Director level that were not coordinated outside the work unit and do not reflect substantive matters. This issuance also mandates the filing in recordkeeping systems of documents received in agency offices if they contain information that impacts on the business of the receiving organization.

(U) Additional guidance on drafts is available in a pamphlet on "What is a Record?" provided to new employees as of January 1995. This issuance instructs staff to preserve drafts circulated for comment outside of the "primary work unit" if the comments "become the basis for how the draft takes its final form," and particularly "when drafts contribute to the development and understanding of policy and decision-making."

(U) CIA must ensure that staff become aware of these requirements and implement them properly. These requirements also should be incorporated into the working papers item included in the full text CIA schedule; at present, it merely calls for filing "substantive documents" included in working papers in the appropriate official file and provides no additional guidance.

(U) **Recommendation III/5:** Ensure that all staff who create or maintain records are familiar with and properly apply existing agency guidance pertaining to what is a record and the record status of working files, particularly the relevant portions of the regulation entitled "Creation of Agency Records"; modify the description of working papers included in agency schedules so it incorporates the guidance contained in this regulation.

(U) Chronological Files

(U) Disposition Job NC1-263-85-1, Item 16, authorizes CIA to destroy chronological ("chron") files after a short retention period based on the assumption that these records consist solely of chronologically-arranged outgoing documents, copies of which are filed elsewhere along with any related incoming correspondence and background materials. This disposal authority, as incorporated into the schedules used in each CIA directorate and its component offices, defines chron files as duplicates of correspondence retained for ready reference and notes that the subject file copy is the record copy.

(U) However, in a few of the offices NARA visited, agency personnel treat as short-term chronological files materials that should be filed in permanent or longer-term policy or subject file series. For example, many of the basic records of the DI's Office of Weapons, Technology, and

Proliferation are maintained in a chron file, which is screened for permanent documentation at the end of the year. A chron file held by the Directorate of Science and Technology was, in reality, a subject file pertaining to budget matters. NARA also found that several offices' chron files were used as finding aids to substantive policy and program records.

(U) Using chron files for substantive materials above and beyond copies of outgoing documents that are also filed in policy or subject file series clearly can result in the improper disposal of files. Screening chron files at the end of the year to extract policy documents is not an effective or efficient mechanism for ensuring the continued retention of such materials. Chron files that are used as finding aids should be treated as indexes and disposed of or retained in accordance with the disposition instructions for the records to which they relate, as called for in NC1-263-85-1, Item 1e.

(U) **Recommendation III/6:** Treat as chron files only copies of outgoing correspondence maintained for ready reference. Chron files that are used as finding aids to other records should be disposed of or retained as indexes in accordance with NC1-263-85-1, Item 1e.

(U) Agency Records Center (ARC) Disposition Activities

(U) As noted in Chapter II, since 1951 CIA has utilized an agency records center to store its inactive permanent and temporary records prior to final disposition. The ARC destroys temporary records whose retention period has expired. Ninety days prior to the scheduled date of destruction, notices of intent to destroy records are generated using a mail-enabled database application within Lotus Notes. Notices are sent to the appropriate component IMO as well as to the directorate IMO, the agency General Counsel, the Inspector General, and the History Staff. All these offices must concur before the ARC carries out the destruction.

(U) In addition, since September 1995, a board, which is chaired by the agency IMO and includes representatives from the directorates as well as a History Staff representative, meets on a quarterly basis to discuss records disposition issues. This group also reviews notices of intent to destroy records at the ARC and related folder lists and records retirement paperwork. The CIA historian who works with the board believes that the vast majority of the records center accessions reviewed (ca. 95 percent) are appropriate for disposal. However, he has found that working files may sometimes contain unique information of historical value. He also noted that in some instances, permanent material was intermixed with temporary records.

(U) It would appear that ARC holdings that are earmarked for destruction are, in the main, properly scheduled and that CIA has initiated procedures to ensure that records improperly coded as temporary will be preserved. CIA itself has determined that many "permanent" ARC accessions are improperly scheduled and has initiated a project to deal with this problem so that preservation action will be taken only on records that are, indeed, permanent (see Chapter II). Initial work has concentrated on files retired by OIT and its predecessors that pertain to records management.

(U) CIA should continue this project and extend it to the records retired by other directorates and

components where significant mis-scheduling is suspected. CIA should also use this effort as an opportunity to determine if there are gaps in the ARC's holdings of permanent records (no holdings of series earmarked for retirement, missing chronological blocks, etc.) and take appropriate follow-up action (contact program offices, examine accessions retired as temporary, etc.). This work should be carried out in close concert with NARA to ensure against the inadvertent disposal of permanent records and to avert public misperceptions about the project. NARA has already reviewed some "permanent" accessions identified for disposal and has concurred in nearly every instance with CIA's evaluation that the files were indeed disposable.

(U) Recommendation III/7: Continue the project to apply correct schedule items to ARC accessions improperly retired as permanent; include NARA review as part of the process

(U) Transfer of Permanent Records to NARA

(U) Until 1980, CIA schedules did not include any instructions as to when permanent series would be transferred to NARA's legal custody. CIA acknowledged that NARA would eventually accession permanent CIA records but these early schedules stated that the time of transfer would be determined at a later date. Disposition jobs approved from 1980 to 1989 called for the transfer of permanent records to NARA "when national security considerations permit" (except for certain unclassified records of the DS&T component responsible for open source collection; these records are to be transferred when 10 years old). In the late 1980s, NARA pressed CIA for more precise transfer instructions, and in 1988 CIA adopted the wording that has been used ever since: "Transfer to the National Archives when 50 years old, pending CIA determination that continued Agency retention is not required." This approach established 50 years as the basic time frame for transfers but allowed the CIA to retain files of especially great sensitivity as well as records for which the agency still had an operational need.

(U) In light of the standard transfer instructions for CIA records, it is not surprising that NARA has accessioned relatively few CIA textual series, totaling in the aggregate ca. 1000 cubic feet. About half of these records are unclassified reports prepared by the DS&T component responsible for open source collection. NARA also has accessioned monographs prepared by the CIA History Staff as well as certain of the background files this staff utilized. Other transfers, particularly the most recent ones, consist in the main of copies of documents that deal with matters of high research interest that have been subjects of conferences sponsored by the Agency's Center for the Study of Intelligence. These collections deal with such subjects as the CIA's role in the Cuban Missile Crisis, the development of the agency during the Truman Administration, and the estimates of Soviet strength prepared at the height of the Cold War. Most of these records consist of sanitized copies of individual documents, often drawn from many separate record series. Even the most comprehensive of these collections, the Soviet estimates, consists solely of copies of the final estimates themselves, not the related background papers that document their formulation.

(U) With the end of the Cold War and the U.S. Government's commitment to openness, CIA retention of permanent files for 50 years is no longer appropriate. The time of transfer for most CIA series should be reduced, particularly for non-textual records and electronic systems where

the lengthy period of retention poses preservation problems. Permanent records should be transferred in coherent blocks (i.e., chronological segments of record series), not individual documents drawn from a variety of separate files. All documents in the series (or chronological segment thereof) should be transferred, including those that still must be withheld in their entirety as well as the originals of documents that are releasable only with redactions. (Transfer procedures should also take into account CIA's plans to scan its classified records and carry out declassification and redaction on the electronic version of documents only; see Chapter IV for additional information concerning this project and its implications.)

(U) Transferring records by series is essential if NARA is to achieve proper intellectual control over its permanent holdings and also to meet the needs of researchers who want access to coherent blocks of organizational records, not artificially-created collections. Likewise, it is a near universal practice for agencies to transfer entire series, including documents that still cannot be made available to the public. NARA has secure storage areas for sensitive records and staff with the requisite security clearances to handle them. CIA's current practice of withdrawing still-sensitive records prior to transfer entails added processing costs when records are eventually accessioned and also increases the possibility that some documents may be inadvertently lost or misfiled.

(U) As outlined above, 50 years after CIA's creation NARA's holdings of CIA records are skimpy and unsystematic. This situation inhibits access to historically important information and subjects the Executive Branch of Government to criticism. In addition to developing updated generic transfer instructions for permanent series, NARA and CIA must work together to develop a plan and timetable for the transfer of specific records in the near term. The goal of this effort should be the accessioning into the National Archives by the end of 2003 of most permanent CIA files that were cut-off prior to the inauguration of President Kennedy in 1961, particularly files accumulated at high levels within the agency (e.g., files of the DCI), finished intelligence products and related background papers, and files of offices concerned with budgetary matters, legal issues, and congressional relations. This will, for the series accessioned, bring CIA transfers closer to the 30 year line that is the norm for defense and national security agencies. Based on its experience with this transfer, NARA can, approximately five years from now, develop a plan for the transfer of records accumulated during the Kennedy and Johnson Administrations.

(U) **Recommendation III/8:** Work with NARA to develop transfer instructions for permanent records that reduce the age at which CIA records are typically accessioned by NARA and provide for the transfer of entire series (or chronological segments thereof). Take into account CIA plans to review files for declassification electronically.

(U) **Recommendation III/9:** Work with NARA to develop a timetable for the transfer of specific files to the National Archives, with the goal of transferring by the end of 2003 most permanent files cut-off prior to 1961.

(U) CHAPTER IV: AGENCY-WIDE ELECTRONIC RECORDS MANAGEMENT

(U) PROGRAM REQUIREMENTS

(U) Most electronic information created or received by Federal agencies meets the legal definition of records set forth in 44 U.S.C. 3301 and must be managed according to guidelines established by 36 CFR 1234. Agencies must:

(U) Develop and implement an agency-wide program for the management of all records created, received, maintained, used, or stored on electronic media;

(U) Develop and maintain up-to-date documentation for all electronic records systems;

(U) Develop and secure NARA approval of records disposition schedules for electronic records and ensure implementation of their provisions; and

(U) Integrate the management of electronic records with other records and information resources management programs of the agency.

(U) Electronic Recordkeeping Regulations

(U) At present, CIA does not have a regulation that addresses electronic recordkeeping per se. Rather, several agency records management regulations promulgated early in 1997 address various aspects of this issue. The introductory paragraph of the agency regulation entitled "Information and Records Management Program," which establishes CIA's overall information management program and provides its broad outlines, specifies that this issuance "applies to all records and information regardless of their media." The agency regulation entitled "Creation of Agency Records," explicitly includes e-mail, word processing documents, spreadsheets, and databases among the record types that must be managed in agency recordkeeping systems. This regulation further specifies that electronic recordkeeping systems must be inventoried and holds program managers responsible for "defining migration strategies" when electronic information systems are in the planning phase.

(U) The agency regulation entitled "Maintenance of Agency Records" mandates the maintenance of records, regardless of media, in a retrievable and readable format through out their life cycle. This regulation also states that the agency will adhere to NARA's guidance regarding electronic records, as contained in 36 CFR 1234, and requires migration plans and the creation and maintenance of "clear and thorough" systems documentation to ensure that records can be read and retrieved and their approved dispositions can be carried out.

(U) An agency regulation entitled "Disposition of Agency Records" calls for the transfer of permanent records to NARA in accordance with NARA media standards or other agreements made between NARA and CIA. This regulation re-states requirements contained in other records management regulations concerning the need to migrate electronic records and create and

maintain sufficient system documentation.

(U) The issuances outlined above are consistent with NARA guidance and provide an adequate regulatory foundation for the management of CIA electronic records. It should, however, be noted that prior to 1997, when these regulations were issued, there was no guidance in place that specifically addressed electronic records, although the general definition of records used by CIA included electronic media. The lack, until recently, of guidance that deals with issues unique to electronic records may account for some of the problems discussed below.

(U) Recent Initiatives to Strengthen the Program

(U) In June 1994, CIA's Office of Inspector General (IG) Office issued a report recommending that the Office of Information Technology (OIT) assert a stronger central leadership role in electronic records management. This recommendation stemmed from problems the agency had experienced in responding to Congressional requests for information. Instead of being able to quickly obtain the needed data using automated agency-wide indexes and abstracts, staff were forced to devote a great deal of effort to searching, at times in an uneven and duplicative fashion, a wide array of files. These files included electronic systems, unscheduled local servers, and miscellaneous collections held in individual offices and the Agency Records Center (ARC).

(U) The IG attributed the problems outlined above to a lack of a coordinated agency records management program with top level support, particularly in the area of electronic recordkeeping. The IG report stressed that OIT needed to adopt a broad perspective covering all aspects of records and information management, as opposed to its traditional more narrow focus on technology and related technical issues. This report also called for the development of an agency-wide strategic plan for information systems so that CIA could deal in a credible and efficient manner with internal and external information needs.

(U) As a follow-up to the IG report, the Associate Deputy Director for Administration for Information Systems (ADDA/IS) has issued the "Information Systems Strategic Plan." This plan calls for business process re-engineering in the automation area and has as its ultimate goal the maintenance of all CIA recorded information in an electronic format within an electronic recordkeeping system. To accomplish this, the plan requires the coordination of all records and information management activities and re-engineering the entire records management process within CIA, while at the same time ensuring that access to sensitive information is restricted to those with a need to know.

(U) Electronic Records Management Program Office (ERMPO)

(U) In addition to the strategic plan, another major result of the IG report was the creation within OIT of the Electronic Records Management Program Office (ERMPO) in July 1995. ERMPO is intended to serve as a proactive, component-wide focal point for electronic records management and planning. This new program office provides guidance to directorate and component IMOs and other Points of Contact (POCs) in the electronic records management area and coordinates

their activities. ERMPO was not, however, assigned responsibility for developing the CIA's internal electronic mail regulation. Instead, staff assigned to the Director of Information Management worked with the Directorate of Administration's Office of Communications to develop this directive. It was issued in February 1997. ERMPO also is directing the development of several shared information systems which will have a major impact on agency operations and recordkeeping and, ultimately, on NARA (these systems are discussed below).

(U) ERMPO has had mixed success. On the one hand, it has missed several self-imposed deadlines; it has not been able to release its products on schedule nor has it completed an agency-wide inventory of electronic systems. On the other hand, it has underway significant new systems that will, if implemented successfully, change agency recordkeeping in major ways. As CIA's electronic records program expands, ERMPO's role will likewise grow.

(U) Major Electronic Systems Under Development by ERMPO

(U) ** PERM- Pro-active Electronic Records Management

(U) CIA officials foresee PERM becoming the electronic repository of agency records by FY 2002. PERM will accept data originating in a variety of existing agency systems. As they enter PERM, the record copies of electronic documents will be centrally captured and managed by creating tags containing such data elements as: document type; content and context-related information drawn from a controlled list of subject headings included in an agency file guide; disposition instructions; and security classification. The system will collect and display as much information as possible concerning each document from the time of creation or designation as a record through its migration to PERM. It will automate records creation and maintenance as well as document retrieval and will also provide an audit trail to monitor access to restricted information.

(U) The first phase of PERM's development has focused on electronic mail, which is used throughout CIA and has high visibility government-wide at the present time. Furthermore, CIA regards e-mail as the electronic record type that is easiest to deal with from a technical standpoint. Although CIA has a successful e-mail delivery/maintenance system, PERM is not able to function as an electronic records management system. It does not yet have the functionalities the latter must address, particularly in the area of determining whether or not individual messages have record status.

(U) Phase Two of PERM will focus on Microsoft Office Suite products (e.g., Power Point), word processing, spreadsheets, etc. Phase Three will address information systems such as cable messaging systems and administrative information systems. In the short run, CIA envisions PERM providing such benefits as the ability to conduct thorough searches of electronic documents to locate specific records and information and to create a variety of statistical reports (e.g., the number of classified agency documents, the number of documents eligible for declassification review, etc.). In addition, PERM will explicitly impose responsibility for records management actions on each records creator (e.g., assignment of record status and disposition instructions to

documents). In the longer term, CIA believes PERM will eliminate the need to retrospectively scan and apply optical character recognition (OCR) processing to existing hard copy documents. It will provide automated "alerts" as documents become eligible for declassification review and will enable the agency to be more confident that the results of document searches are complete. Finally, PERM will simplify issues arising from the need to migrate electronically maintained information, but only to the extent that it incorporates other databases and office automation applications, supersedes other operating systems, and becomes the system of record for CIA's electronic records.

(U) At present, CIA's systems development plans for PERM do not include a fully developed migration strategy which complies with NARA regulations. To comply with 36 CFR 1234, the CIA must begin to address migration within the context of life cycle planning for electronic records system design and implementation, especially to provide a clear path for migrating to the next application or platform information that must be retained when an existing system is superseded. The very nature of PERM poses this issue quite clearly. It is an application within Lotus Notes, a proprietary software widely used throughout CIA. Absent an appropriate migration strategy, it will be difficult over time to assemble the requisite software, documentation, and metadata to support and interpret data for future use. Yet in the future, CIA must be able to access current and non-current information that is required to meet its operational needs.

(U) **SMART-Space Management and Retirement Tracking

(U) The Space Management and Retirement Tracking (SMART) system is a second significant system ERMPO is developing. The impetus for SMART stems from a plan to consolidate multiple aging legacy systems used to track agency hard copy records. Some employees indicated to NARA that problems CIA experienced in retrieving information in order to respond to Congressional inquiries, particularly in regard to covert activities, also contributed to the decision to develop SMART.

(U) SMART incorporates the functionality of pre-existing systems, particularly those used at the ARC, and is designed to track objects, specifically hard copy records, at the box, folder, and/or document level. It is intended to automate the retrieval process by utilizing a bar code system for box, folder, and document-level control. SMART also will include disposition information. A SMART sub-system pertaining to records retirement became operational in July, 1997, but other elements of the system have not yet been implemented. Because SMART was specifically designed to track hard copy objects, it is not fully integrated into the overall agency electronic records plan. At present, there are no guidelines for entering information into SMART about magnetic or other nontextual special media CIA uses to store or transfer electronic information. These deficiencies need to be corrected as soon as possible.

(U) **MORI-Management of Officially Released Information

(U) The Management of Officially Released Information (MORI) system is designed to serve as a "single, Agency-wide, integrated computer system that supports electronic entry, storage, and

retrieval of officially released information.” The MORI Concept of Operations Document, which has been widely disseminated within the intelligence community, states that MORI includes the following additional types of information and functionality:

- (U) Entry, storage, and retrieval of classified full-text versions of released documents;
- (U) On-line image editing and redaction;
- (U) Automated case management with distributive workflow capabilities; and
- (U) On-line database of decision support materials to provide information which would support declassification decisions.

(U) According to the Concept of Operations Document, MORI will manage all official CIA release programs, including responses to FOIA/PA requests, Congressional inquiries, investigations carried out by the Department of Justice, materials provided to the Department of State in connection with the preparation of volumes in the *Foreign Relations of the United States* series, public statements made by the DCI and other CIA officials, and special searches. In addition, MORI will include information reviewed under the CIA’s Records Declassification Program (RDP), which was established under the auspices of OIT and tasked with implementing Executive Order 12958.

(U) The tracking system portion of MORI will capture the subject(s) of the information CIA releases, to whom it was released, how much was released and withheld, and why any withheld information was not releasable. This, CIA believes, will ensure a complete audit trail on all releases and ensure that agency security concerns are met.

(U) MORI was funded as an agency-wide initiative in FY 94 to “improve the Agency’s ability to systematically, rapidly, and thoroughly search and retrieve information stored in its files and databases ... [and to] provide a central database of all officially released unclassified agency information.” This project stemmed from an internal Agency task force, the MORI Task Force of 1994. Special collections already entered into MORI include documents relating to CIA actions in Guatemala, the so-called October Surprise of 1980, the assassination of President Kennedy, and the exposure of U.S. troops to toxic agents during the Gulf War. In addition, the collections included in two legacy systems, the Officially Released Information System (ORIS) and the Information Privacy System (IPS) have already been converted into MORI in their entirety.

(U) Phase One of MORI is Document Management, the entry into the system of individual documents, either through direct electronic entry or the scanning and OCR processing of hard copy. The use of these two techniques will permit MORI to display and print any document in the system. The system allows full text searching for keywords or structured queries for specific topics, dates, or names.

(U) Phase Two of MORI is Case Management. The most significant aspect of this phase is the

capability for on-line review, analysis, and redaction of individual documents, eliminating the need to copy paper documents, block out portions that are not yet releasable on the copy, place appropriate markings on the original, and then produce a public release copy with any still-sensitive information excised. CIA believes this will speed the review and redaction process and enable the agency to produce redacted public use copies of documents in which the information that has been excised cannot be restored by the requestor. Phase Two, through integrated query and reporting functionalities, will also enhance CIA's ability to track and monitor the status of requests. In Phase Three, Workflow, distributed tasking and coordination capabilities will be developed.

(U) It is the CIA's intention to retain the electronic version of the information included in MORI generally for 25 years. Paper documents will be returned to their original file series after scanning, and, if permanent, will eventually be transferred to NARA. CIA has no intention, once documents have been reviewed on-line, to segregate or otherwise identify original paper documents that still require protection. Nor will CIA redact original documents that contain information that must remain classified.

(U) To the extent MORI is used for the declassification of permanent records under the RDP, the system has significant implications for CIA and NARA, particularly as to when and how permanent records may be transferred to the National Archives. Many of the records reviewed under the RDP will, by virtue of their age, be appropriate for immediate transfer to NARA, particularly if transfer dates are reduced as has been proposed in Chapter III of this report. Unless CIA segregates or otherwise identifies information that still must be protected, NARA cannot make the original paper records available to researchers when they are accessioned since NARA does not have the resources to go through files to remove and/or redact documents that are not yet releasable in their entirety. If, however, CIA wishes NARA to consider accepting as the medium of transfer the scanned images and/or electronic text resulting from OCR processing, as maintained and redacted on MORI, then the storage, retrieval, and transmission of this data must be consistent with standards developed for use throughout the intelligence community. RDP managers are actively taking part in the government-wide Declassification Productivity Managers Council, including its Automation Working Group, which is seeking to develop such standards.

(U) As MORI becomes fully operational, CIA must ensure that specific review projects undertaken under the RDP encompass all the records in an entire series (or chronological segment thereof), as opposed to individual documents. Only if all records in a series are converted can data in MORI be transferred to the National Archives, even if the electronic product meets yet-to-be-developed community-wide standards acceptable to NARA. The sole exception would be items in a series that cannot be scanned, such as oversize (bulky) enclosures. This whole series approach to document conversion has already been utilized in CIA in a system adopted by the DO. As discussed in Chapter III, all records in a series (or chronological series segment) should be transferred to NARA, including documents containing information that cannot yet be declassified.

(U) NARA also is concerned about the status of special collections on high interest subjects included in MORI. Even if the paper documents remain in their original file series, these

collections may be of great value since they bring together documents from diverse sources and may include difficult to locate items. NARA and CIA should work together to either preserve such collections or the indexing information that will allow them to be intellectually reconstituted at some later date.²

(U) Management of Electronic Records - Directorate-level Perspectives

(U) While ERMPO is responsible for agency-wide electronic records initiatives, individual directorates have components working on electronic records issues specific to them. The DO has been especially active, applying to electronic recordkeeping the compartmented yet centralized approach it has long utilized for paper documents. The Directorate's Information Management Staff (IMS) is responsible for DO electronic records development, including systems-program interaction, systems development and integration, and OCR conversion. In 1993, DO initiated an automation/upgrade program that entails equipment upgrades and compatibility throughout the DO, uniform configurations within the DO and between DO and DA, and a systems environment in conformance with CIA's overall reliance on Lotus Notes and with other agency-wide applications. The DO believes this program, which is in its final phase, will result in a simplified records search and retention process that will allow for the full text retrieval of information.

(U) DO maintains an inventory which includes hundreds of automated systems. Of these, ALLSTAR, the largest and most heavily used, is a series of multiple electronic databases which maintains index terms and abstracted information for name tracing and the retrieval of operational documents.

(U) Other significant DO systems include:

(U) [NOTE: The following five paragraphs (15 lines of text) are security classified and have been removed from the unclassified version of this report.]

² The discussion of MORI and its implications for NARA reflects CIA plans as of the middle of 1996, when the bulk of the evaluation visits took place. CIA currently does not intend to use MORI in connection with the RDP. However, the basic approach CIA will utilize for the RDP includes scanning original paper documents and using the electronic version for declassification review and redaction. Hence, NARA's concerns remain the same.

(U) The DO's centralized and well-staffed IMS has made many advances in electronic recordkeeping. It has not, however, adequately addressed migration issues. The DO inventory includes only those automated systems which DO has migrated; more than half of the hundreds of systems DO initially maintained have not been migrated. It appears that DO carried out this process without regard to whether or not these systems were scheduled. This stems primarily from the DO's misperception that all its databases are disposable under the General Records Schedules or as reference copies because paper is maintained as the record copy.

(U) Major electronic records initiatives are also well underway in other directorates. The DI's Office of Information Resources (OIR) manages DI-specific information system services, develops analytically-oriented computer-based applications and tools, and provides information systems training and consulting services. OIR is currently working to develop a successor to the basic system DI analysts use to search and access intelligence data from a wide variety of sources, the SAFE (Support for the Analyst's File Environment) system, which includes CIA data as well as information provided CIA by other intelligence community agencies. The new system OIR is developing, the Corporate Information Retrieval and Storage (CIRAS) system, is intended to extend SAFE's current capabilities, particularly through enhanced key word searches and by the inclusion of open source intelligence data available by purchase that it is not in SAFE.

(U) The DI's current efforts have included automating certain hard copy indexes and/or migrating data contained in existing automated indexes that are used by a branch of the DI's Office of Support Services to locate individual records within a large document collection stored at the ARC. During evaluation visits, some Branch staff expressed concern that this would not be done.

(U) Despite the major role of OIR in DI automation efforts, the Directorate's program in this area is characterized by less centralized direction than is the case in DO. For example, the use of desktop publishing applications has expanded in DI's Office of Current Production and Analytic Support (CPAS) without adequate controls. Systems used by CPAS to publish and disseminate reports electronically may not be able to store associated photographs and graphics. Furthermore, procedures are not yet in place to ensure the long-term preservation of a record copy of all reports. CIA believes that paper copies are routinely produced. However, since reports are now produced outside of established review processes that in the past resulted in their retention, this may not be true in all cases.

(U) Within the DA, the basic administrative functions its component offices carry out have, for

the most part, been automated, with major systems covering, for example, most logistics, training, personnel and fiscal activities.

(U) A 1985 OIT internal audit recommended that DS&T's Office of Research and Development (ORD) develop a database for information about its core mission of sponsoring R&D projects to enable the office to more efficiently retrieve data concerning current and past projects. Such a system was only developed in 1997.

(U) In sum, major work is underway at the directorate level to automate manual processes and upgrade older electronic systems. The pace of the work varies among components, with the DO particularly advanced, especially in terms of the degree of centralization, coherence and control that has characterized its efforts. This centralized DO model may warrant consideration as an agency-wide approach under OIT direction. Separate directorate level programs may result in duplicative efforts, needless costs, and the creation of fragmented systems that impede the speedy retrieval of information that is comprehensive and up-to-date. At a minimum, the directorates should be encouraged to comply with agency-wide hardware and software standards and engage in greater information sharing concerning on-going projects.

(U) **Recommendation IV/1:** Comply with NARA guidance contained in 36 CFR 1234 when electronic systems are developed, maintained, or upgraded. Of particular importance is the need to include migration strategies as part of the life-cycle planning for electronic records systems design and implementation.

(U) **Recommendation IV/2:** Ensure that the major new systems ERMPO and individual directorates are developing can fully meet the needs they were designed to satisfy. Specifically:

(U) a. Include in PERM the capability for creators and recipients of e-mail to designate whether messages are record, non-record, or personal;

(U) b. Ensure that SMART has the capability to retrieve special media records in the ARC; and

(U) c. Ensure that all documents in a series (except documents that by their nature cannot be converted, e.g., bulky enclosures) are included in MORI. Ensure that systems are compatible with standards developed for the entire intelligence community.

(U) Records Disposition Issues

(U) Electronic Mail

(U) For the past several years, CIA personnel have used e-mail extensively to coordinate their activities. However, during the period when NARA evaluators visited CIA offices, agency-wide e-mail guidance had not yet been developed. During the evaluation, NARA reviewed files that included hard copies of relevant e-mail messages. However, in some offices NARA visited, staff

expressed concern over the lack of formal guidance on such issues as determining the record status of individual messages and when and how information in an e-mail system should be deleted. DO's experience in migrating e-mail from an older system to Lotus Notes is a graphic illustration of the cost entailed in not managing e-mail on an on-going basis: To ensure that needed documentation was not lost, employees had to review over a million documents and, if appropriate, print them out or ensure their migration.

(U) In February, 1997, after evaluation visits were completed, CIA issued an agency regulation which provides guidance to agency personnel on the use of e-mail. (This regulation replaces several earlier issuances relevant to e-mail promulgated by individual components.) CIA's e-mail guidance states that all electronic messages are records, except those that "clearly fall within the category that is defined as non-record material," and must be filed and maintained in accordance with NARA-approved disposition schedules. The regulation further specifies that unless an electronic recordkeeping system is in place, e-mail messages that are scheduled for retention for more than 30 days should be printed to paper and filed appropriately. Originators of e-mail messages are responsible for determining record status and assigning the appropriate file category. Other than referring users to component IMOs for guidance, the regulation does not indicate what types of messages might fall into the non-record category.

(U) Additional e-mail guidance is contained in the other agency records management regulations that were issued early in 1997. CIA's "Creation of Agency Records" regulation specifies that receipts for e-mail messages will be created and maintained when necessary and also calls for the maintenance of distribution lists for record e-mail messages in a manner that ensures that addressees can be identified. This issuance also tasks program managers with determining when the creation and maintenance of e-mail message receipts is needed.

(U) CIA's recently issued e-mail regulation and the relevant sections of other recent regulations are thorough and consistent with NARA guidance. NARA suggests two additions. The e-mail regulation should specify that encrypted messages that must be retained in a recordkeeping system (i.e., more than 30 days) should be stored in an unencrypted form to ensure that the information can be accessed. Also, if CIA staff use the calendaring function included in LOTUS Notes, it should incorporate into its guidance the requirements contained in 36 CFR 1234.24(a)(5).

(U) **Recommendation IV/3:** Disseminate the agency e-mail regulation to all agency staff who use e-mail and monitor its implementation. Update this issuance as NARA develops new guidance concerning the maintenance and disposition of e-mail.

(U) Lack of Inventories and Schedules

(U) The CIA has strongly embraced electronic recordkeeping but has lagged in inventorying and scheduling the automated systems it has implemented. As noted in Chapter III, the CIA has submitted schedules covering only about 60 separate systems, nearly all of which pertain to routine housekeeping functions and are, therefore, covered in the General Records Schedules. None of the major systems discussed earlier in this chapter has been scheduled nor has CIA

scheduled the electronic versions of key records that are now created and/or maintained electronically, such as the President's Daily Brief and the related feedback notes prepared by briefers, major intelligence publications, and files pertaining to covert operations and intelligence assets.

(U) Many in CIA believe that electronically maintained information is not a record or if it is a record, it is almost invariably disposable. They also believe that when the retention of electronic data is required, it can and should be preserved in a hard copy format. For example, as discussed above, the DO has made major strides in electronic recordkeeping. However, its current issuance on the subject, a DO instruction entitled "Managing Electronic Records," calls for the creation and filing of paper or microfilm as the mechanism for preserving record information contained in automated working files. As has been noted, DO believes all of its databases are either covered by the GRS or may be disposed of as reference copies.

(U) There are thousands of unscheduled CIA electronic records systems. Until they are scheduled, CIA is legally obligated to preserve the information they contain even though most, in all likelihood, lack archival value.

(U) ERMPO has begun an effort to develop a centralized catalogue/inventory of CIA records, and initially hoped to have a complete product by the end of Fiscal Year (FY) 1997. However, at the end of FY 1996, most major agency components had yet to submit inventories for inclusion in the centralized catalogue, including the DS&T, DO, and DI. DA had only submitted data on 66 systems. In order to assist in this undertaking, existing inventories are available to use in preparing the centralized catalogue. For example, DO's catalogue has hundreds of entries (which were migrated into the centralized catalogue during FY 1997), while DI has published a guide that describes hundreds of DI and non-DI information systems. DI is also working on an inventory of all directorate software applications, while its Crime and Narcotics Center has compiled an inventory of its systems. While Directorate IMOs hope that these products and similar ones will provide much of the information needed for the centralized catalogue, these reports were not prepared as part of an inventorying/scheduling effort and, therefore, may lack all the data necessary to prepare schedules.

(U) ERMPO should complete the centralized catalogue and ensure that the resulting product has the required information needed to support the scheduling process. To that end, the content and format of the centralized catalogue should reflect the guidance NARA has provided in the *Disposition of Federal Records* handbook, the *Managing Electronic Records* instructional guide, and NA Form 14028, NARA's Information System Description Form.

(U) Completion of the centralized catalogue as a comprehensive inventory has taken longer than CIA initially anticipated. In the interim, the pre-existing inventories and listings of electronic systems should provide the basis for the initiation of a major scheduling effort aimed at the most significant, mission-related systems of each CIA directorate as well as at the agency-wide systems ERMPO is developing.

(U) Schedules for permanent electronic systems should include transfer instructions that take into account 36 CFR 1228.188, which calls for the transfer of electronic media to NARA legal custody as soon as they become inactive or when the agency cannot provide proper care and handling sufficient to ensure preservation of the information.

(U) Until they are scheduled, CIA must treat all systems not covered by the GRS as permanent in accordance with 36 CFR 1234.30, which mandates annual sampling, media refreshment, and media migration. Scheduling these systems will satisfy legal requirements and, in addition, relieve CIA of a considerable financial burden by greatly reducing the number of systems subject to the standards for permanent electronic records contained in the CFR.

(U) **Recommendation IV/4:** Complete the centralized catalogue project so the agency will have a comprehensive, agency-wide inventory of electronic records. After the centralized catalogue is completed, implement measures to keep it current as additional systems are developed.

(U) **Recommendation IV/5:** Using the centralized catalogue data as well as pre-existing inventories and lists, work with NARA to initiate and carry out a project to ensure that all CIA electronic record systems are eventually covered by NARA-approved schedules. This effort should begin as soon as possible, using existing inventory information, and should encompass the review in coordination with NARA of housekeeping systems to determine which are covered by the GRS and which are not. Develop schedules for non-GRS records, beginning with those that pertain to CIA's core missions and are the most likely to be appraised as permanent.

(U) CHAPTER V: RECORDS MANAGEMENT AT FIELD SITES

(U) NARA's evaluation focused on CIA Headquarters components since these offices accumulate the bulk of the agency's records. However, DO field sites play a critical role in CIA's intelligence gathering and covert action programs. It was, therefore, essential that NARA visit some field sites to determine whether or not they created and preserved adequate documentation of their activities and to see if it is readily retrievable within the agency. NARA evaluators visited three field sites,

[REDACTED]

(U) The work assignments and activities of individual intelligence officers at field sites stem from an approved set of directives. Some directives are sent to multiple stations while others may be applicable to only one. Periodic meetings are held at stations concerning activities and progress towards meeting the goals specified in directives. No formal notes are taken. However, memorandums that document the assignment of tasks specified in directives and the status of actions taken are produced and sent to CIA Headquarters via cable.

(U) [NOTE: The following two paragraphs (21 lines of text) are security classified and have been removed from the unclassified version of this report.

(U) NARA evaluators were given access to field files and examined the Headquarters files corresponding to six of these field files. This review supports DO's assertion that field files are duplicative of records found at Headquarters. However, given the small number of files reviewed, NARA cannot say with certainty if this is the case for all or most DO field offices.

(U) The agency position that field files are non-record is contrary to the agency's own internal guidance contained in its "Creation of Agency Records" regulation, issued in February, 1997. This issuance limits the non-record material designation to library and museum material preserved solely for reference or exhibition purposes, extra copies of documents preserved solely for convenience of reference, and stocks of publications or processed documents. The same regulation includes in the agency's definition of records such materials as rough notes, interim versions of documents and supporting background materials, and correspondence relating to matters of short term interest.

(U) CIA should designate field files as records that are covered by the working files item of Disposition Job No. N1-263-85-1/Item 18a. This schedule item calls for the periodic review of files and the placement in the appropriate official files of any substantive/non-duplicative documents.

(U) The maintenance of field files is subject to considerable central direction and oversight from DO Headquarters. As noted in Chapter I of this report, pairs of DO auditors periodically conduct records management inspections of each field site and prepare a report which both Headquarters and the field site are sent. The results of the audits are briefed to field management and documented in a cable sent to Headquarters for division managers, the Chief of DO's Information Management Staff, and the DO IMO. There is, however, no formal structure for correcting any deficiencies that are found. Other requirements mandated from Headquarters stem primarily from security concerns and are geared to ensuring that record holdings are kept to a minimum and can be destroyed quickly in an emergency.

(U) [NOTE: The following four paragraphs (15 lines of text) are security classified and have been removed from the unclassified version of this report.]

(U) **Recommendation V/1:** Ensure that DO personnel at field offices are aware of the record

status of the files they accumulate, and dispose of those files in accordance with DO instructions and the NARA-approved schedule for working files.

(U) CHAPTER VI -AUDIOVISUAL AND CARTOGRAPHIC RECORDS

(U) PROGRAM REQUIREMENTS

(U) 36 CFR 1232 provides guidance to agencies concerning the management of audiovisual records. These regulations include guidance concerning the formats to be used for permanent audiovisual records and the environmental conditions appropriate for storing such materials. 36 CFR 1228.184 contains guidance concerning the transfer of permanently valuable audiovisual records to the National Archives. In addition, agencies are responsible for submitting schedules to NARA to cover audiovisual records not already approved for disposal in General Records Schedule 21.

(U) Agencies are also responsible for submitting schedules to NARA to cover cartographic records not already approved for disposal in General Records Schedule 17. NARA regulations prescribing the transfer of permanent cartographic records are found in 36 CFR 1228.186.

(U) FINDINGS AND ANALYSIS

(U) Overall Program Guidance

(U) The agency regulation entitled "Information and Records Management Programs" incorporates the statutory definition of records (44 U.S.C. 3301) that makes it clear that records include all media, not merely paper. Likewise, other CIA records management regulations apply to all records regardless of media. However, these issuances do not include specific guidance concerning the creation, maintenance, and disposition of special records as contained in 36 CFR, Chapter 12, Subchapter B and NARA management guides (e.g., "Managing Audiovisual Records" and "Managing Cartographic and Architectural Records").

(U) Recommendation VI/1: Issue specific guidance concerning the creation, maintenance, and disposition of nontextual records that incorporates NARA guidance. This can be done either through a separate issuance or by incorporating guidance into the appropriate records management regulation or OIT's "Information Management Handbook," which is presently being re-drafted.

(U) Audiovisual Records

(U) CIA accumulates a wide variety of audiovisual records, either as products of intelligence gathering or in connection with agency administrative operations. Included are aerial photography resulting from U.S. overhead reconnaissance activities, sound and video recordings of foreign radio and television broadcasts, and recordings of speeches and other appearances by the Director and Deputy Director of Central Intelligence. The conditions under which these and other audiovisual records are maintained vary. Likewise, some of these records are covered adequately by current schedules, some appear to be unscheduled, while the schedules for other series warrant revision. Some schedules are implemented properly; others are not. In addition, some audiovisual

records are maintained on obsolete media and may not be readable with available equipment.

(U) Audiovisual Records of the DS&T – Open Source Collection

(U) The DS&T is one of the most important components of CIA from the standpoint of audiovisual records. A DS&T component responsible for open source collection accumulates sound and video recordings of foreign radio and television broadcasts. The bulk of these records are disposable. However, items 30c and 36c(3) of Disposition Job N1-263-84-11 call for the transfer to the National Archives of recordings meeting selection criteria that identify as permanent radio and television broadcasts originating in specified countries. Permanent records are to be transferred to NARA when no longer needed to support current requirements.

(U) In 1993, CIA transferred ca. 3000 dictabelts, several videos, and a motion picture film that fall under these items. Records span the period 1950 to 1975. When the NARA evaluators visited CIA in 1996, staff could not identify later records that had been identified as permanently valuable under the approved schedule. CIA should locate these records and transfer post-1975 increments of this series in a more timely fashion. Prompt transfer will help avert the problem NARA has experienced with the 1950-1975 series segment -- dictabelts are an obsolete medium that is very costly to convert to contemporary formats that meet the requirements for archival records. Since these recordings are obtained from open sources, transfers when records are 5 years old should satisfy CIA security needs as well as its administrative requirements. In addition, the selection criteria for permanent recordings should be revised to reflect the current world situation, i.e., the specific nations for which certain broadcasts are permanent were so designated because they were under Communist control, which is no longer the case for most.

(U) In addition to the materials discussed above, the DS&T component responsible for open source collection also maintains videos acquired from open sources or accumulated by other CIA components, primarily components of the DI, including an office which is a video production activity. These video recordings are not scheduled. However, DS&T applies to these records disposition instructions for motion picture film contained in the DS&T schedule and has retained videos of intelligence interest as well as agency-produced videos. These videos should be scheduled so that the record elements, as required by 36 CFR 1228.184, are preserved and, in the case of permanent recordings, are properly identified. In addition, a schedule geared to these records would accurately reflect their specific nature and content.

(U) Current video formats used are either VHS or three-quarter inch. DS&T plans to use Super VHS in the future. These formats do not meet the standards for permanent videos contained in 36 CFR 1232.30(c), which explicitly states that "video cassettes in the VHS format are unsuitable for use as originals of permanent or unscheduled records due to their inability to be copied without significant loss of image quality."

(U) Most videos accumulated by DS&T's open source collection component are stored in a facility that appears to have adequate environmental controls. When the NARA evaluation team visited, the temperature in the storage vault was 65 degrees with a relative humidity of 25%,

which is appropriate. However, thousands of videos are maintained at the ARC, where, as noted in Chapter II, humidity levels may be subject to seasonal fluctuations and may cause damage to the films.

(U) Recommendation VI/2: Use formats that conform to 36 CFR 1232.30 for permanent and unscheduled video recordings.

(U) Audiovisual Records of the DS&T -- National Photographic Interpretation Center (NPIC)

(U) NPIC was established in 1961 as the focal point for CIA photographic intelligence and the processing and interpretation of overhead imagery, including imagery obtained from reconnaissance satellites. NPIC maintains negative roll film in its film library for approximately 12-18 months and then retires it to the ARC. While at NPIC, film is maintained under conditions that do not meet archival standards. These records are maintained in an open office environment that lacks adequate temperature and humidity controls. At the ARC, a large segment of the film is held in the cool storage vault while the remaining records are stored in the ARC's general stack area. Film at the ARC appears to be in good condition despite the fact that for ca. 1 year it is stored under questionable conditions at NPIC. As noted earlier in this report, the possibility that humidity levels at the ARC may fluctuate is a cause for some concern, especially in the case of aerial film and other non-textual records.

(U) NPIC's master negatives are scheduled for permanent retention and one very significant transfer of records to NARA has taken place. In 1996, pursuant to Executive Order 12951, ca. 800,000 images acquired from the first satellite imagery program, CORONA, were declassified and transferred to the National Archives. Imagery from other programs, including the U-2 and other airborne reconnaissance programs, remains in agency custody but preparations are underway to transfer it to NARA.

(U) NPIC also maintains a still photography collection of technical intelligence for use by analysts and others in the intelligence community. This collection, which has been built from a variety of sources, including open materials, contains millions of prints and is organized geographically and/or by type of equipment. Caption information generally includes source of the image and its security classification. A local database provides search capability keyed to captions and keywords to about half of the collection. Master negatives are stored at the ARC and the collection is scheduled for permanent retention in the National Archives. However, no records have as yet been transferred to the National Archives even though the earliest photographs date from the early 1930s. CIA should implement the transfer of older photographs to the National Archives along with the corresponding negatives. Print files should be periodically cut off to facilitate future transfers of chronological blocks of photographs.

(U) In the fall of 1996, NPIC became part of the newly formed National Imagery and Mapping Agency (NIMA). It has not yet been determined if older NPIC records stored at the ARC will be transferred to NIMA.

(U) Other Significant Audiovisual Records

(U) The CIA's Agency Information Staff (AIS), a component of the Office of the Director of Central Intelligence, produces videotapes and still pictures of special events. The videos are currently stored in office space lacking environmental controls, although AIS intends to eventually transfer them to the ARC. AIS has not systematically retained the still pictures it accumulates, other than photographs used in an agency-wide newsletter. Both series of records are unscheduled.

(U) The DCI's Public Affairs Staff (PAS) maintains transcripts and sound recordings of speeches, briefings, and meetings involving the Director and Deputy Director of Central Intelligence. The recordings and transcripts of these meetings are earmarked for permanent retention and eventual transfer to NARA. However, there are significant gaps in PAS holdings of sound tapes; while they appear complete from 1993 to the present, there are few earlier recordings, particularly for the period 1986-1992. It also should be noted that PAS staff who maintain the transcripts and recordings were not aware that these records are scheduled for permanent retention in both media. The cassettes used to record speeches are better than standard grade but do not meet NARA standards for permanent records.

(U) CIA generates posters for use within the agency. However, these records are not scheduled nor are they systematically maintained at a central agency-wide collecting point or by individual offices. CIA should schedule posters relating to the agency's history and basic functions for permanent retention and add NARA's Electronic and Special Media Records Services Division (NWME) to its poster distribution list. Existing posters documenting the agency's mission should be gathered for a one-time transfer.

(U) Cartographic Records

(U) CIA uses cartographic products for intelligence publications, briefings, and to plan and carry out operations. There are several significant bodies of CIA cartographic records. The most important is held by a component of the DI's Office of Current Production and Analytical Support (CPAS), which produces maps for other agency components and other federal agencies. Some CPAS products are produced in very small quantities while other projects may entail the production of 20,000 copies. In 1996, CPAS began creating maps electronically.

(U) In addition to providing maps to the requesting office, CPAS retains copies for its own use and also retires a copy of each map it prepares to the ARC. Some maps are unclassified and are distributed to ca. 200 organizations. Most, however, are classified.

(U) The record set of CPAS maps is sent to the ARC on a quarterly basis. Small (8" x 10") maps are stored in acid free folders and cartons. Larger maps are put in map folders, which are rolled and wrapped in kraft paper. Although a few of the map edges have slipped outside the folder edge and show minor tears, maps are generally in good condition. These records are scheduled for permanent retention only in paper form. The electronic version of these important records must also be scheduled.

(U) In addition to the maps it produces, CPAS also holds a collection of maps created by the Office of Strategic Services (OSS). These maps are stored at both the ARC and CPAS. Because of their age and fragile condition, these records should be transferred to NARA immediately. NARA already holds nearly all permanent OSS textual records and the OSS map collection would supplement the collection in NARA.

(U) A second significant repository of cartographic materials is the CIA Map Library, which is currently part of the DS&T component responsible for open source collection (until 1992, it was administered within the DI). The Map Library holds four million maps, most of which are unclassified. Maps are acquired from other agencies, by purchase from open sources (e.g., travel guides, tourist maps, etc.), and from other CIA elements, especially CPAS. The Map Library provides reference services to CIA and to other federal agencies. It regards its holdings as a working reference collection, portions of which are disposable when no longer needed under NC1-263-85-1, item 17 (Reference Files). Older, superseded materials are periodically weeded out. Classified materials that have been weeded are offered to other CIA components or destroyed. Unclassified materials are regularly offered to the Library of Congress.

(U) To ensure against the inadvertent disposal of historically significant cartographic records and/or the misperception that this is taking place, a separate item covering the collection should be added to the DS&T schedule. As part of the appraisal process, NARA either will confirm that the entire collection is, indeed, reference material or will identify any portions that warrant preservation and eventual transfer to the National Archives.

(U) NPIC also has a Map Library that provides support for its own analysts, for CIA components, and for the intelligence community. Most of its holdings, which include both paper and electronically maintained maps, were acquired from the Defense Mapping Agency. The Library also produces some maps electronically. The Library's staff view their collection as a reference file. The holdings of the NPIC Library should be scheduled; during the appraisal process, NARA will determine if any of these materials warrant preservation. With the transfer of NPIC to NIMA, NIMA will be responsible for preparing the schedule.

(U) Other Nontextual Records Issues

(U) "Missing Records"

(U) Most agencies maintain collections of still pictures documenting substantive agency functions and activities. However, no such collections were located at the CIA during the evaluation, other

than aerial photography. As noted above, the Agency Information Staff does not systematically retain photographs of significant events it covers. NARA evaluators sought, but could not locate, photographic collections in the Office of the DCI, the DI, the DO, or the DS&T. Even if prints of some still pictures are included in textual series (e.g., incorporated into reports), the lack of systematic collections of original negatives is troubling. Absent a systematic effort to retain prints, negatives, and slides documenting the activities of leading officials and major agency programs, an important part of CIA's history will be lost.

(U) Recommendation VI/3: Inventory non-textual records and develop schedules for all unscheduled series as well as specific schedule items for certain major collections now covered by generic authorities, as identified in this report (e.g., the DS&T's Map Library).

(U) Agency Records Center Issues

(U) Many of the most important audiovisual and cartographic records CIA accumulates are retired to the ARC. For this reason, NARA is particularly concerned about the possibility that humidity levels at the ARC may vary seasonally and exceed recommended levels, thereby endangering many of the nontextual records stored there. Videos stored in the ARC are in danger of catastrophic loss due to tape binder failure and/or fungal contamination. Likewise, NPIC negatives are subject to fungal growth, and those that are in color may experience significant image fading; even if humidity levels are adequate, color film is in danger of significant fading unless it is stored in a genuinely cold environment of 35 degrees Fahrenheit or less. The fact that the 50 year transfer date for CIA records applies to most nontextual series heightens NARA concerns regarding ARC storage conditions.

(U) Some specific preservation concerns vis-a-vis nontextual ARC holdings are noted above. During evaluation visits to the ARC, many other problems were observed. These include: a number of instances where microfiche was housed in containers that were too narrow, resulting in bending at the edges; positive film images and vu-graphs used in briefings stored vertically without adequate support, either without sleeves or in sleeves that were torn; the storage of most motion picture film in regular stack areas without proper environmental controls, as opposed to cool storage; and engineering drawings in tightly rolled bundles, wrapped in acidic kraft paper.

(U) CIA's ability to review nontextual ARC holdings for preservation action is hampered by several factors. ARC staff are not permitted to open most of the accessions in which these records were retired and therefore are unable to identify accessions that contain records that need to be stored in a controlled environment. In addition, the ARC database does not generally include media codes for records retired prior to the late 1970s, so it is difficult to identify older accessions that include nontextual records. For more recent accessions, the ARC database includes media codes that are generally accurate, though some exceptions were noted. There is uncertainty among IMOs as to when nontextual records closely associated with textual files should be retired separately. This uncertainty also extends to how accessions that include a mix of textual and special records should be coded in the ARC database. Finally, the ARC database does not allow the creation of listings and reports based on the date of the records in accessions so that the oldest

nontextual accessions cannot readily be identified. Reports can be derived based on the date of retirement. However, when the ARC database was implemented in 1978, all older accessions were given 1978 accession numbers, increasing the difficulty of locating among all accessions that pre-date 1978 the ones that contain the older nontextual records.

(U) Conclusions

(U) NARA's evaluation revealed serious problems in the area of nontextual records. CIA's overall records management issuances do not adequately address these records. Some of the agency personnel who create and maintain special media do not recognize them as federal records that may be disposed only in accordance with NARA-approved schedules. Certain important series have not been scheduled and, in other instances, significant records do not appear to be maintained systematically. Storage conditions at the ARC are not ideal for nontextual records. Many accessions of special records were improperly packed prior to retirement. These problems are exacerbated by the fact that CIA retains custody of nearly all nontextual records for a very lengthy period since, with only a few exceptions (e.g., recordings of foreign radio and television broadcasts), CIA schedules call for the transfer of permanent records to NARA when 50 years old, regardless of medium.

(U) Nontextual records are usually transferred by federal agencies to NARA earlier than textual files, primarily because of preservation concerns. Ideally, still photographs, motion picture film, and video and sound recordings should be transferred no later than 10 years after creation. NARA's preferred method of acquiring posters is by adding the Electronic and Special Media Records Services Division (NWME) to the distribution lists used by agencies for internal and external dissemination of this type of record. Cartographic and architectural drawings should be transferred systematically when records are 30 years old or less. CIA must either transfer such records to NARA in accordance with these guidelines or provide the ARC and other holding areas with the resources to implement preservation programs that will ensure compliance with federal regulations, including the copying of records created on obsolete media to contemporary formats.

(U) Recommendation VI/4: Modify schedules to accelerate the transfer of non-textual records to NARA custody; immediately transfer the OSS map collection to NARA.

(U) Recommendation VI/5: Develop and implement a plan to preserve nontextual series that must remain in CIA custody for more than 10 years. Include upgrading storage conditions in the ARC to meet NARA standards for the storage of permanent nontextual records, copying permanent records maintained on obsolete media to contemporary formats, and reviewing the ARC's nontextual holdings to identify accessions in need of preservation action. Particular attention should be paid to locating nontextual records contained in accessions retired to the ARC prior to 1978.

(U) APPENDIX A: RECOMMENDATIONS

(U) Recommendation I/1: Ensure that there are sufficient IMO's in both OIT and the directorates to implement the recommendations in this report. Review workloads and staffing levels to determine whether or not IMO's should be assigned to organizations where day-to-day records management duties are currently handled by POCs.

(U) Recommendation I/2: After they have completed agency-required records management training classes, require IMO's to periodically take additional training to ensure their familiarity with records issues, policies, and procedures.

(U) Recommendation I/3: Develop a one-day course dealing with the recordkeeping responsibilities of program staff, including the application of approved records schedules to their files and basic records concepts such as distinguishing records from nonrecord materials.

(U) Recommendation I/4: Develop selection criteria for the OIT component-wide internal audits to ensure that serious records management issues and deficiencies are systematically addressed. DO selection criteria could serve as a model for developing selection criteria for OIT audits.

(U) Recommendation I/5: Ensure that the OIT component-wide Audit Implementation Progress Reports are received by AIRMP in a timely manner and that they address the correction of cited deficiencies.

(U) Recommendation I/6: Ensure that sufficient resources are allocated to allow AIRMP to reach its goal of conducting nine audits per year.

(U) Recommendation I/7: Develop a mechanism to ensure that DO audit recommendations are implemented. The OIT audit follow-up procedures can be used as a model.

(U) Recommendation II/1: Ensure that employees, including deputy directors and other high level decision makers, are aware of requirements in federal law and regulation to document and maintain in appropriate files all important policy and decision-making actions, including those discussed via electronic mail (e-mail) or during telephone conversations. E-mail communications that meet the definition of records should be printed out and placed in the appropriate file. Telephone conversations should be documented through Memorandums to the File.

(U) Recommendation II/2: Ensure that employees follow CIA guidance requiring the creation and maintenance of files to document agency activities.

(U) Recommendation II/3: Monitor the implementation of the "Agency File Guide" to ensure that it is effective and meets the needs of the directorates.

(U) Recommendation II/4: Ensure that adequate indexes are created where necessary and that staff who need to use them have familiarity with them.

(U) Recommendation II/5: Require the timely creation of indexing information concerning individuals of foreign intelligence or foreign counterintelligence interest following guidance in the existing DO instruction.

(U) Recommendation II/6: Inspect new accessions retired to the ARC to ensure that records are scheduled properly and to identify any preservation problems and needs, including compliance with CIA regulations concerning the use of acid-free folders for permanent series. This review can either be conducted by component IMOs prior to shipment of records or by ARC staff as part of the accessioning process.

(U) Recommendation II/7: Continue and extend the ARC preservation project. Implement a preservation project for older records held in locations other than the ARC.

(U) Recommendation II/8: Continue the recent initiatives to revitalize the Vital Records Program. Ensure that the "Vital Records Handbook" is disseminated upon completion, and that IMOs continue reviewing older vital records in the ARC and identifying more recent vital records.

(U) Recommendation II/9: Consider conducting a mock emergency preparedness drill to ensure that, in an emergency, records are easily retrievable, all equipment needed to read the records is available, and system documentation is adequate to operate any system that contains vital records.

(U) Recommendation III/1: Review full text and skeleton schedules for declassification; provide full text schedules to NARA even if portions are security classified.

(U) Recommendation III/2: Submit schedules for all unscheduled series, including series where records are now maintained electronically, particularly permanent series where paper documents are no longer printed out and filed.

(U) Recommendation III/3: Ensure that all staff are familiar with the schedules that cover the records they accumulate.

(U) Recommendation III/4: Work with NARA in the development of a revised schedule for DO operational project files; use this schedule as the basis for written guidance that is provided to those who review and/or process older operational files.

(U) Recommendation III/5: Ensure that all staff who create or maintain records are familiar with and properly apply existing agency guidance pertaining to what is a record and the record status of working files, particularly the relevant portions of the regulation entitled "Creation of Agency Records"; modify the description of working papers included in agency schedules so it incorporates the guidance contained in this regulation.

(U) Recommendation III/6: Treat as chron files only copies of outgoing correspondence maintained for ready reference. Chron files that are used as finding aids to other records should be

disposed of or retained as indexes in accordance with NC1-263-85-1, Item 1e.

(U) Recommendation III/7: Continue the project to apply correct schedule items to ARC accessions improperly retired as permanent; include NARA review as part of the process

(U) Recommendation III/8: Work with NARA to develop transfer instructions for permanent records that reduce the age at which CIA records are typically accessioned by NARA and provide for the transfer of entire series (or chronological segments thereof). Take into account CIA plans to review files for declassification electronically.

(U) Recommendation III/9: Work with NARA to develop a timetable for the transfer of specific files to the National Archives, with the goal of transferring by the end of 2003 most permanent files cut-off prior to 1961.

(U) Recommendation IV/1: Comply with NARA guidance contained in 36 CFR 1234 when electronic systems are developed, maintained, or upgraded. Of particular importance is the need to include migration strategies as part of the life-cycle planning for electronic records systems design and implementation.

(U) Recommendation IV/2: Ensure that the major new systems ERMPO and individual directorates are developing can fully meet the needs they were designed to satisfy. Specifically:

(U) a. Include in PERM the capability for creators and recipients of e-mail to designate whether messages are record, non-record, or personal;

(U) b. Ensure that SMART has the capability to retrieve special media records in the ARC; and

(U) c. Ensure that all documents in a series (except documents that by their nature cannot be converted, e.g., bulky enclosures) are included in MORI. Ensure that systems are compatible with standards developed for the entire intelligence community.

(U) Recommendation IV/3: Disseminate the agency e-mail regulation to all agency staff who use e-mail and monitor its implementation. Update this issuance as NARA develops new guidance concerning the maintenance and disposition of e-mail.

(U) Recommendation IV/4: Complete the centralized catalogue project so the agency will have a comprehensive, agency-wide inventory of electronic records. After the centralized catalogue is completed, implement measures to keep it current as additional systems are developed.

(U) Recommendation IV/5: Using the centralized catalogue data as well as pre-existing inventories and lists, work with NARA to initiate and carry out a project to ensure that all CIA electronic record systems are eventually covered by NARA-approved schedules. This effort should begin as soon as possible, using existing inventory information, and should encompass the

review in coordination with NARA of housekeeping systems to determine which are covered by the GRS and which are not. Develop schedules for non-GRS records, beginning with those that pertain to CIA's core missions and are the most likely to be appraised as permanent.

(U) Recommendation VI/1: Ensure that DO personnel at field offices are aware of the records status of the files they accumulate, and dispose of those files in accordance with DO instructions and the NARA-approved schedule for working files.

(U) Recommendation VI/1: Issue specific guidance concerning the creation, maintenance, and disposition of nontextual records that incorporates NARA guidance. This can be done either through a separate issuance or by incorporating guidance into the appropriate records management regulation or OIT's "Information Management Handbook," which is presently being re-drafted.

(U) Recommendation VI/2: Use formats that conform to 36 CFR 1232.30 for permanent and unscheduled video recordings.

(U) Recommendation VI/3: Inventory non-textual records and develop schedules for all unscheduled series as well as specific schedule items for certain major collections now covered by generic authorities, as identified in this report (e.g., the DS&T's Map Library).

(U) Recommendation VI/4: Modify schedules to accelerate the transfer of non-textual records to NARA custody; immediately transfer the OSS map collection to NARA.

(U) Recommendation VI/5: Develop and implement a plan to preserve nontextual series that must remain in CIA custody for more than 10 years. Include upgrading storage conditions in the ARC to meet NARA standards for the storage of permanent nontextual records, copying permanent records maintained on obsolete media to contemporary formats, and reviewing the ARC's nontextual holdings to identify accessions in need of preservation action. Particular attention should be paid to locating nontextual records contained in accessions retired to the ARC prior to 1978.

(U) APPENDIX B: EVALUATION REVIEW AND FOLLOW-UP

(U) AUTHORITIES

(U) 44 U.S.C., Chapter 29

(U) 36 CFR, Chapter XII, Subchapter B, Part 1220, Subpart C, NARA Evaluation Program

(U) FOLLOW-UP STEPS

(U) Action Plan

(U) The CIA will submit to the Archivist of the United States an action plan to implement the recommendations in this evaluation report no later than 90 days after the date of transmittal of the final report to the head of the agency.

(U) The action plan will include: specific actions the agency plans to take in response to each recommendation, the proposed month and year for completing each planned action, and major milestones with dates for tracking the completion of implementation actions that are expected to extend longer than three years past the date of the action plan. If the CIA does not plan to implement a specific recommendation, the reason for not acting will be documented in the action plan.

(U) Progress Reports

(U) The CIA will submit a progress report on the implementation of the action plan to NARA every six months until the action plan is completed.

(U) NARA Review

(U) NARA will analyze the adequacy of the CIA's action plan; provide comments to the CIA on the plan within 60 calendar days from receipt; assist the CIA in implementing recommendations; and inform the CIA when progress reports are no longer needed.