



National Archives and Records Administration

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Date : February 28, 2007

Reply to

Attn of : Office of Inspector General (OIG)

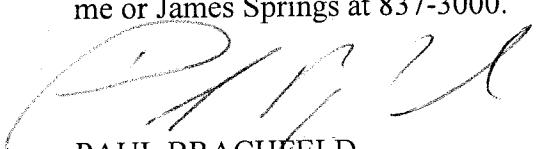
Subject : Audit Report No. 07-06 Audit of the Processing of Records Accessioned into NARA

To : Allen Weinstein, Archivist of the United States (N)

Enclosed for your information is the subject report. The report contains two recommendations, one of which contains sub recommendations. In their response to the report, management concurred with the recommendations. Management's comments can be found as an appendix to the enclosed audit report.

In accordance with NARA Directive 1201, Audits of NARA Programs and Operations, subparagraph 6.c., your written response to the recommendations in this report should be forwarded to this office within 45 days.

Should you have any questions concerning the report and recommendations, please contact me or James Springs at 837-3000.


PAUL BRACHFELD
Inspector General

Enclosure

OIG Report No. 07-06
**Audit of the Processing of Records
Accessioned into NARA**

February 28, 2007

EXECUTIVE SUMMARY

The core mission of the National Archives and Records Administration (NARA) is to safeguard and preserve the records of Government, ensuring that people can discover, use, and learn from this documentary heritage. Processing – the act of making records available to the public – is at the heart of NARA’s mission. Its importance is reflected in NARA’s new Strategic Plan (2006-2016) where “preserve[ing] and process[ing] records to ensure access by the public as soon as legally possible” is identified as a strategic goal. Another important element in making records efficiently available to the public is their description in the Archival Research Catalog (ARC). ARC (and in the future the Electronic Records Archive, ERA) is the central repository and online discovery tool for descriptions of NARA’s holdings; is an efficient and effective way for customers to discover NARA holdings; and serves as the only measurable agency-wide vehicle for the description of NARA holdings.

The NARA Office of Inspector General (OIG) performed an audit of NARA’s processing of textual records to determine if NARA was making records available to the public in a timely manner.

We found that NARA is constrained in its ability to provide efficient and effective access to, and information about, NARA holdings, and in its ability to meet its mission of ensuring public access to records as soon as legally possible. This condition is the result of large backlogs of inadequately processed records and records awaiting adequate description and entry into ARC. This condition was formally conveyed to external stakeholders for the first time via NARA’s new Strategic Plan for 2006-2016 but to date has yet to be defined as a Material Weakness by the Archivist.

NARA management is aware of the backlogs, having initiated a study known as the Workload Analysis Study (WAS) that revealed the enormity of the processing backlog in textual records (A copy of the Executive Summary from this study is attached for reference). This study of processing found that only 36 percent of textual holdings¹ are adequately processed (i.e., ready for efficient and effective use by the public), meaning that 1.85 million cubic feet of records require additional processing to be considered appropriately processed. The study places the cost for complete processing of these records at a staggering \$1.57 billion. Even the minimal amount of processing allowing the public to request and view these records (e.g. the cost associated with intellectual control, description, FOIA, and declassification – excluding holdings maintenance and preservation) is \$848.5 million.

Additionally, our review of Performance Management and Reporting System (PMRS) statistics show that just over half of NARA’s traditional holdings are described in the Archival Research Catalog (ARC). While this meets NARA’s strategic goal of having 50 percent of traditional archival holdings described in an online catalog, it still leaves more

¹ Both the WAS and this report focus only on textual holdings because they comprise the majority of NARA’s workload and backlog.

than 1.6 million cubic feet of traditional archival holdings not described in ARC, making it more difficult for the public to learn about and use these holdings.

NARA is not alone in its inability to keep up with the processing requirements of ever increasing volumes of records. Archives and repositories of all sizes and affiliations report backlogs of "unprocessed" records. One study revealed that one third of the records repositories surveyed reported more than half of their holdings unprocessed and well over half of the repositories reported at least a third of their collections unprocessed.

The three NARA offices with textual records processing backlogs - the Office of Records Services, Washington, D.C. (NW), the Office of Regional Records Services (NR), and the Office of Presidential Libraries (NL) - are at differing stages in their response to the WAS. The office with the greatest volume of inadequately processed records, NW, has prepared an initiative that reorganizes functions and reprograms resources, primarily from reference, to processing. This effort will reduce, but not eliminate, the current NW processing backlog over the next 10 years. NR, which has a smaller volume of inadequately processed records, is currently reviewing the WAS and formulating an action plan. NL, which has the smallest processing backlog in terms of volume but the greatest in terms of per cubic foot cost, view their situation as solely a resource issue because of the more rigorous processing demands placed upon their records by the Presidential Records Act (PRA), requiring a page-by-page review of presidential records, among other things.

We commend management on the actions they have taken thus far, including the Archivist's stated commitment to reducing the processing backlogs. However, it is our opinion that without additional resources, NARA will not be able to adequately process records and thereby will not be able to achieve its strategic goal of providing efficient and effective access to records as soon as legally possible. We base this opinion on several factors: The sheer size of the backlog, both in terms of volume and Full Time Equivalents (FTEs) is astounding and cannot be eliminated given current resources and processes. In addition, the Executive Order on Declassification (E.O. 12958) has placed additional burdens on processing records. And finally, NARA has identified a large volume of currently disposable records for permanent retention. This change in retention means that an estimated 1.5 million cubic feet of records will be added to the processing workload, above the 1.85 million cubic feet identified in the WAS, thus almost doubling NARA's estimated processing backlog.

Beginning in FY 1999 individual NARA offices requested additional resources to address processing workload or facilitate the entry of descriptions into ARC, however additional resources were not received. Additionally, we were informed that NARA did not request additional resources in 2007 nor did they intend to request additional resources in their 2008 budget submission because the Office of Management and Budget (OMB) informed NARA that they expected our budget requests to be minimal - at or below the previous years' levels.

This report contains two recommendations that address our findings. We believe that these recommendations, upon adoption, will build upon management action taken to date in an effort to make more records available to the public in a more efficient and effective manner.

BACKGROUND

NARA is responsible for the custody, use, and withdrawal of records it receives. Three offices - The Office of Records Services – Washington, D.C. (NW), The Office of Regional Records Services (NR), and The Office of Presidential Libraries (NL) – have programmatic responsibility for making records available to the public. Processing involves the steps needed to open a record to the public and includes establishing basic series or collection level control, flagging records that have privacy or national security classifications, providing enhanced descriptions of the records², and performing initial preservation so that the records may be served to the public.

For some time NARA has been aware of the existence of backlogs of unprocessed records but did not have the mechanisms or measures in place to identify the extent of the backlogs. In fact, NARA did not have a standard definition of the tasks associated with processing. Processing was variously defined by individual units and individuals. In FY 2006, NARA initiated a study of the processing of textual records (Workload Analysis Study) aimed at quantifying NARA's workload and backlog. The study revealed an enormous backlog of inadequately processed textual records (1.85 million cubic feet, representing 64 percent of NARA's holdings) and the resources required to address the backlog (13,614 FTE³ at an estimated cost of \$848.5 million)⁴.

In FY 2006, NARA issued its new Strategic Plan for the period 2006-2016. The new Strategic Plan acknowledges the backlogs of unprocessed records, their unavailability to the public and subsequent impact on NARA's mission, and places an emphasis on reducing these backlogs. The Strategic Plan identifies more effective processing as a strategic goal and includes a number of strategies for accomplishing this. NARA's new Strategic Plan identifies the development of a new performance measure to capture data related to processing workloads and backlogs. However, there are several challenges to be overcome before implementing such a measure; including development of a standard, uniform approach to processing⁵, and the development of a process for capturing and reporting reliable information on the volume of records that have been adequately processed. Because of these challenges, the processing performance measure is not due to be implemented until 2008.

² This includes, where essential for efficient access, box or folder level descriptions of records.

³ In this instance, what the FTE figure signifies is that it would take 1 person 13,614 years to process the backlog of records, or 13,614 people 1 year to process the backlog of records.

⁴ These are the FTE and costs associated with establishing intellectual control and performing an access review. Holdings maintenance and preservation increase both the FTE and cost estimates, however, these have been previously addressed in OIG Report No. 05-13.

⁵ Based on the WAS and the results of this audit, it appears that processing in NR and NW are comprised of similar steps and tasks, while NL's process differs. Therefore, one approach may apply to both NR and NW while another may need to be developed for NL.

OBJECTIVE, SCOPE AND METHODOLOGY

The objective of our audit was to determine if archival textual records transferred to NARA are made available to the public in a timely manner. Essentially, we set out to determine if NARA was providing access to records as soon as legally possible.⁶

To accomplish this objective we conducted interviews with staff from the Office of Policy and Planning (NPOL) responsible for overseeing the Workload Analysis Study (WAS), revising the Strategic Plan, and revising Performance Measures. We also interviewed staff from the Office of Records Services – Washington, D.C. (NW), the Office of Regional Records Services (NR), and the Office of Presidential Libraries (NL). We reviewed pertinent documentation, specifically the WAS, NW's Processing Initiative, and individual articles concerning processing. We also reviewed pertinent PMRS statistics and queried databases containing information on NARA's current and future holdings. We also reviewed quarterly performance narratives and budget requests from the offices, and requested budget documentation or other communications with external stakeholders from budget office.

This audit, including the conduct of a survey and preparation of a survey report, was conducted between May and November 2006. This audit was conducted in accordance with generally accepted government auditing standards (GAGAS).

Finding

NARA is not currently meeting its stated strategic goal of ensuring efficient public access to records as soon as legally possible.⁷ This condition is the result of several factors, most notably a lack of adequate resources necessary to address the current backlog of inadequately processed records as well as those in the pipeline. NARA is attempting to address some of the factors under their control that have contributed to the backlog, such as developing and implementing a measure of processing that will track workload and backlogs; and NW has undertaken an initiative to increase processing with current resources. However, NARA has no plans to ask for additional resources, which we believe are necessary to keep up with the processing workload. As a result, researchers are constrained in their ability to effectively identify records of interest and NARA is constrained in its ability to provide efficient service on its holdings.

⁶ This is the goal identified in NARA's new Strategic Plan.

⁷ In NL, inadequately processed records are unavailable to the public for review on demand; while in NW and NR, inadequately processed records are made available upon demand, but service on and research into these records is inefficient.

NARA's Budget and Staffing Are Inadequate to Meet Processing Needs

NARA officials have known for some time that processing backlogs have been growing. An example of the growth in holdings can be seen in what is now the Office of Records Services – Washington, D.C (NW). In 1995, NW⁸ held 1,360,100 cubic feet of traditional (i.e. non-electronic) records. At the end of fiscal year 2006 this volume had grown to 2,369,515 cubic feet.

As far back as 1999, the Office of Records Services – Washington, D.C. (NW); Office of Regional Records Services (NR), and; Office of Presidential Libraries (NL) partnered in a request for additional resources to standardize descriptions in an effort to populate the newly developed Archival Research Catalog (ARC). This descriptive work was one element of the many tasks associated with fully processing records and would help researchers better identify records of interest. In subsequent years, these offices requested additional resources to aid in populating ARC and adequately process holdings. However, none of these requests yielded any additional resources. Despite repeated requests for additional information, the Financial Services Division was unable to provide us with more detailed information on the disposition of offices past requests for additional resources related to processing and the population of ARC.

A 2004 records management Business Processing Reengineering effort acknowledged a large textual records processing backlog and recommended that a study be undertaken to quantify the size of the backlog. This study was undertaken in FY 2006⁹ and resulted in the aforementioned Workload Analysis Study. The study found that NW and NR would require 3,330 and 592 FTE, respectively, to establish intellectual control and perform access review on their backlog of inadequately processed textual holdings. This represents the minimum amount of effort required to allow the public to identify records of interest and NARA effectively and efficiently service resulting requests. The study estimates that NL would require 9,692 FTE to fully process their holdings.¹⁰ According to the Office of Policy and Planning (NPOL), additional resources were not requested in FY 2007 and there are no plans to request resources in FY 2008 because of guidance from OMB that our budget requests be minimal – at or below prior year levels.

Impact of Executive Order 12958 and the Presidential Records Act

Exacerbating the backlogs are Executive Order 12958, “Classified National Security Information” and passage of the Presidential Records Act (PRA). Executive Order 12958 has siphoned NARA staff away from processing to oversee mandatory declassification efforts. With the passage of the Presidential Records Act, all Presidential materials were

⁸ In 1995, what is now known as the Office of Records Services – Washington, D.C. and referred to as NW, was known by the moniker of NN.

⁹ Identified in 2004, the study was not undertaken until 2006 due to a lack of funding.

¹⁰ The tasks associated with processing NL records are different from the tasks associated with processing in NR and NW. The sensitive nature of presidential records requires a page by page review of this material. The differences in processing, and reasons for those differences, are discussed in detail in the full report of the Workload Analysis Study.

defined as Presidential records starting with the records of the Reagan administration. The result is that the records of President Reagan forward are subject to FOIA requests to which previous Presidential records, being donated materials, are not subject. The result is that Presidential library staff finds themselves responding to FOIA's and other special access requests to the detriment of performing systematic processing.

Lack of Processing Workload and Backlog Measures

While the offices responsible for processing records acknowledged backlogs and requested additional resources as far back as FY 1999, NARA lacks a mechanism for accurately tracking processing workloads and backlogs. The authors of the Workload Analysis Study noted the difficulty in obtaining statistical information concerning processing workloads and backlogs because of the lack of readily available information.¹¹ The fact that volumes of adequately and inadequately processed records contained in the WAS are estimates can be directly traced to the lack of reliable and adequate information on processing workloads and backlogs. To remedy this, NARA's new Strategic Plan (2006 – 2016) calls for a performance measure related to processing workloads. Several challenges lie ahead in developing and implementing this measure, most notably the development of a process for capturing and reporting reliable information on the volume of records that have been adequately processed within each work unit or office (e.g. NR, NL, and NW). Because of these challenges, the processing performance measure is not due to be implemented until 2008.

Action taken as a result of the WAS

As a result of the WAS NARA has identified reducing the processing backlog as a strategic objective in its new Strategic Plan and plans on implementing a performance measure to track processing workload and backlogs. The issue was also to have been raised to NARA's recently formed Risk Review Board (RRB) for agency wide consideration and coordination. However, we were informed during the course of the audit that NPOL and the RRB Chairperson had decided not to consider this issue, believing that addressing it in the Strategic Plan and the development of a performance measure would suffice.

NW, the office where the majority of the textual records backlog resides, has developed and implemented an initiative to reduce the processing backlog through the reassignment of resources, among other things. The NW initiative also seeks to first open records with the greatest public interest by prioritizing processing based on customer demand. NR is currently studying the WAS and what action it might be able to take to reduce the current backlog. NL views its backlog of unprocessed records as solely a resource issue, given the constraints placed upon them by the need to perform a page by page review of the records in their holdings.

¹¹ This was a finding in the Draft Executive Summary. However, the Final Executive Summary excluded this finding.

We commend NW on their swift response to the WAS. However, NW serves as a good example of the extent of the dilemma facing NARA. While the NW initiative would substantially reduce the current backlog of inadequately processed textual records in NW, it would not eliminate the current backlog, falling about 119 FTE short of what is required according to the WAS. Additionally, over this 10 year period, another 200,000 cubic feet of permanent records, requiring processing, will be transferred to NW from the Washington National Records Center¹², requiring an additional 127 FTE worth of processing. Thus, at the end of the 10 year period, NW would be left with a processing backlog equivalent to 246 FTE or approximately 385,000 c.f. Finally, to accomplish a significant reduction in the current backlog of unprocessed records, NW has shifted resources away from some of its other critical functions, such as correspondence and research room service.

Also looming on the horizon is the reappraisal of a large volume of records containing personal data. The reappraisal of these records, from disposable to permanent, is projected to add an additional 1.5 million cubic feet of textual records to the processing workloads of NW and NR. Exact transfer dates and volumes are not yet available as the status of individual reappraisal projects varies.

We are making two recommendations that we believe will allow the agency to gain a better handle on processing backlogs and workloads and allow the agency to better inform stakeholders of the challenges that lie ahead.

¹² NW also receives permanent textual records via direct transfer from the creating agency. However, this volume is not predictable and accounts for a small percentage of the annual volume of records transferred.

Recommendation 1

The Archivist of the United States (N) should:

- a. not only ensure that work processes associated with processing records are examined and reengineered, in accordance with Long Range Performance Target 2.2 from NARA's 2007 Annual Performance Plan, but also develop a plan for formally reviewing the reengineering effort and evaluating the results. This evaluation should result in a written work product that assesses the results of the examination/reengineering effort and serve as a guide for future decisions on processing (including those identified in steps b. and c. below);
- b. establish agency wide processing priorities and request additional resources to accomplish this effort;
- c. continue to clearly define to stakeholders the processing challenges facing the agency and redefine strategic goals and mission statements as the situation dictates.

Management Response

Management concurred with our recommendations.

Recommendation 2

The Office of Policy and Planning should establish measures of success for processing that take into account the challenges facing the agency. Furthermore, processing measures and goals should take into account and reflect the difference in processing between NL and the other offices.

Management Response

Management concurred with our recommendation.

Appendix A

Workload Analysis Study, Executive Summary

FINAL

**Workload Analysis Study (WAS)
For Paper Textual Holdings
Executive Summary**

As an agency, we have known for some time that we need to quantify our workload for processing archival materials. Doing so was one of the recommendations that emerged from the original records lifecycle BPR, in Fiscal Year (FY) 2004. At that time the study was deferred until FY 06 because of lack of funding. This study examines our workload for processing *paper textual holdings*. It provides information on not only the work to be done to process our paper textual holdings, but the costs associated with that work under current staffing, organization, and processes.

The WAS Team was directed by Pam Wright (LCS, NPOL), with assistance from Carol Lagundo (LCS, NPOL), and with support from Booz Allen Hamilton contractors. We worked closely with program office liaisons Jim Hastings (NW), Diane Vogt-O'Connor (NR) and Sam McClure (NL) as well as many office representatives and subject matter experts (SMEs) to gather the information for this study.

This study includes both data generated specifically for the study, as well as data folded in from other sources:

New data:

- a statistical sampling of the MLR (the WAS team worked with Jim Hastings and NW staff), focusing on processing relating to intellectual control of the records.¹
- a statistical sampling of the Atlanta regional local locator (the WAS team worked with Diane Vogt-O'Connor and staff from the Atlanta region), focusing on processing relating to the intellectual control of the records
- a statistical sampling of the Philadelphia regional local locator (the WAS team worked with Diane Vogt-O'Connor and staff from the Philadelphia region), focusing on processing relating to the intellectual control of the records
- a narrative survey of processing in the Presidential Libraries (the WAS team worked with Sam McClure and NL staff)

Other data:

- the NW Textual Preservation Survey, provided by Preservation Programs
- the draft NR Textual Preservation Survey, provided by Preservation Programs

¹ Processing for "intellectual control" results in the arrangement and description of the records. We also determined the workload for access review in the intellectual control studies.

Project Goals

The purpose of this project was to determine the extent of NARA's paper textual holdings that currently require appropriate processing as well as the level of effort (human resources) required to appropriately process the records.

It was important to be able to define the project and to gather the data in a way that was meaningful to each office. To that end, we worked closely with office liaisons, representatives and SMEs to shape the evaluation of the workload in a way that made sense to them. Although NW and NR regarded the workload in very similar ways, NL had different issues and perspectives that were discussed fully and taken into consideration for this study.

Additionally, it was imperative to be able to roll up the information for the agency as a whole. As much as each office needs to be able to view the information that is unique to it, the Senior Staff and management require bottom line information for the entire agency. This report attempts to provide both the individual office data and the data for the agency in a clear and useful manner.

Re-engineering of work processes, user needs assessment and projection of incoming workloads are not within the scope of this project. All would be useful follow-on activities.

Methodology

The method of gathering the data was customized to each office, under the guidance and approval of each office.

- For NW, we performed a statistical sampling of the MLR. From that sampling, we used statistical analysis to extrapolate the part of the processing workload that deals with intellectual control of paper textual holdings. We drew on NW's Preservation Survey Study of Textual Records for information on the preservation part of the processing workload and rolled these up to provide a snapshot of the current NW processing workload as a whole.
- Due to time, budget and resource constraints, as well as the ability to leverage existing preservation studies, we performed a statistical sampling of the location registers maintained by two regions for our NR study. Again this sampling dealt with intellectual control of paper textual holdings. We rolled up those numbers to provide an estimate for all of NR, but we caution that this approach provides simply an estimate rather than a statistical analysis of the workload for NR as a whole.

- A statistician familiar with OMB regulations set out the specific sampling methodology for both the NW and NR samplings and reviewed the findings once the numbers were received.
- A survey, rather than a statistical sampling, was determined to better meet the needs of NL. We worked closely with the NL liaison and office representatives to craft the survey. Note that this is statistically the least accurate of the approaches, since it relies on self-reporting rather than on a statistical analysis of the activities making up processing. Nonetheless, we are confident that these figures provide a sufficiently valid representation of the workload facing Presidential Libraries.
- With the data gathered, we were able to estimate the workload for paper textual holdings for the agency: how much is unprocessed, what general categories the unprocessed materials fall in, how long it currently takes to process the materials, and how that translates into FTEs and dollars. The following is a summary of that information.

Findings

The numbers are staggering, but we should note that NARA is not alone in dealing with this issue. In a recent article in *The American Archivist*, Mark Greene and Dennis Meissner state, "Put very simply, processing is not keeping up with acquisitions and has not been for decades, resulting in massive backlogs of inaccessible collections at repositories across the country (and across all types of archival institutions). It should be dismaying to realize that our profession has been struggling with backlogs for at least sixty years."²

The following numbers get to the heart of the matter regarding our workload. Statistics may be manipulated in any number of ways. Our intent with the following statistics was to provide a clear and understandable assessment of where we stand right now and what we have to do. The totals for the agency as well as a breakdown by office, and further by category are provided below. The full report contains far more detail about the nature and extent of the workload.

² Mark A. Greene and Dennis Meissner, "More Product, Less Process; Revamping Traditional Archival Processing," in *The American Archivist*, Fall/Winter 2005, pp. 208-263

DONE: How much of our paper textual holdings are adequately processed?

Office	Percentage of adequately processed holdings	Cubic feet of adequately processed holdings
NW	26%	536,305 cu. ft.
NR	62%	417,551 cu. ft.
NL	47%	80,478 cu. ft.
Agency	36%	1,034,334 cu. ft.

TO DO: How much of our paper textual holdings are not adequately processed?

Office	Percentage of inadequately processed holdings	Cubic feet of inadequately processed holdings
NW	74%	1,501,695 cu. ft.
NR	38%	256,792 cu. ft.
NL	53%	89,648 cu. ft.
Agency	64%	1,848,135 cu. ft.

FTE/Person Years (1776 hours per year) at current processing:

Office	FTE / Person Years required for intellectual control (arrangement and description)	FTE/Person Years required for intellectual control and access review	FTE/Person Years required for intellectual control, access review & holdings maintenance	FTE/Person Years required for intellectual control, access review, holdings maintenance, & other preservation
NW	959	*3,330	4,883	13,957
NR	256	**592	1,389	5,622
NL	9,692 (includes all processing) ³			
Agency	10,907	13,614	15,964	29,271

*NW FOIA = 2,126 FTE; NW declassification = 245 FTE.

**NR FOIA = 336 FTE.

Cost: (at GS grade and step as per full WAS report)

Office	Cost for intellectual control (arrangement and description)	Cost for intellectual control and FOIA and declassification	Cost for intellectual control & holdings maintenance	Cost for intellectual control, holdings maintenance, & other preservation
NW	\$60,174,289	*\$208,876,421	\$253,226,853	\$708,956,844
NR	\$13,655,537	**\$31,613,561	\$50,966,091	\$255,871,411
NL	\$607,993,606 (includes all processing)			
Agency	\$681,823,432	\$848,483,588	\$912,186,550	\$1,572,821,861

*NW FOIA =\$133,317,182; NW declassification = \$15,384,950.

**NR FOIA = \$ 17,937,884.

³ This survey does not include the William J. Clinton Library. It also does not include NL's special access review and PRA re-review workload.

Methodology for NW and NR

As a first step, we asked the office liaisons and their staff to define “appropriately processed.”

NW and NR agreed on the definition:

Records are appropriately processed when their provenance is established, series identified, fundamental preservation completed, they have been reviewed for access, and they have been described to the level that ensures safe and efficient use.

We identified the processing activities that are required to move holdings from a state of “unprocessed” to “appropriately processed.” We further gathered resource data to identify how much time it takes to perform each activity. We then grouped the unprocessed holdings into major categories based on the activities that were required to make them appropriately processed.

NW and NR grouped their unprocessed records into the following four categories:

- 1) Single series - unprocessed except for an MLR entry. The archivist analyzing the holdings under this category determined that there was only one series per MLR entry and that the records had not been processed beyond completing the MLR entry.
- 2) Multiple series - unprocessed except for an MLR entry. The archivist analyzing the holdings under this category determined that there were multiple series per MLR entry and that the records had not been processed beyond completing the MLR entry.
- 3) Single series processed with an inadequate legacy description. Holdings in this category had gone through some processing, but had either no description or the description needed to be updated to convert to our current standards.
- 4) Single series processed with description that could be converted to our current standards without having to go back to the holdings for information.

For NW information, Subject Matter Experts categorized the sampled records and identified the complexity of activities within each category. As requested by NW, we drew on the NW Textual Preservation Survey for specific numbers on holdings maintenance and other preservation. We combined this information to get total workload numbers for NW as follows:

NW Workload Analysis

Processing Categories	Cubic Feet to be processed	Workload Hours	Percentage of Workload Hours
Category 1 – Single series: unprocessed except for an MLR entry.	413,483 cu. ft.	3,214,309 hours (This includes: 2,182,881 hours for FOIA and 175,942 hours for declassification)	13%
Category 2 – Multiple series: unprocessed except for an MLR entry.	224,783 cu. ft.	2,151,281 hours (This includes: 1,255,016 hours for FOIA and 220,978 hours for declassification)	8.7%
Category 3 – Single series processed with an inadequate legacy description.	525,761 cu. ft.	151,095 hours (This includes: 29,414 hours for FOIA and 21,764 hours for declassification)	.6%
Category 4 - Single series processed with description that could be converted to our current standards without having to go back to the holdings for information.	337,668 cu. ft.	334,139 hours (This includes: 247,444 hours for FOIA and 13,697 hours for declassification)	1.3%
Processed for intellectual control, but needing FOIA, or additional declassification review	51,135 cu. ft.	63,004 hours (This includes: 59,797 hours for FOIA and 3,207 hours for declassification)	.3%
Holdings Maintenance ⁴	1,189,000 cu. ft.	2,758,409 hours	11.1%
Reformatting	265,000 cu. ft.	6,890,000 hours	27.8%
Custom housing	78,000 cu. ft.	124,800hours	.5%
Conservation Treatment	91,000 cu. ft.	9,100,000 hours	36.7%
Total		24,787,037 hours	100%

⁴ NW textual preservation survey information drawn from *Preservation Survey Study of Textual Records: Office of Records Services – Washington DC*, submitted by Preservation Programs/Document Conservation Laboratory, December 2005.

For NR information, we conducted a statistical sampling of the local locators from two regions: Atlanta and Philadelphia. Subject Matter Experts at each region categorized the sampled records and identified the complexity of activities within each category. We averaged the processing time for those two regions and rolled that up to an estimate for the processing required for intellectual control. As requested by NR, we drew on the draft NR Textual Preservation Survey for specific numbers on holdings maintenance and other preservation.

NR Workload Analysis

Processing Activities	Cubic Feet to be processed	Workload Hours	Percentage of Workload Hours
Processing Required for intellectual control	256,792 cu. ft.	1,051,682 hours	11%
Holdings Maintenance ⁵	477,000 cu. ft.	1,414,659 hours	14%
Reformatting (includes Preparation)	4,000 cu. ft.	104,000 hours	1%
Custom Housing	71,000 cu. ft.	113,600 hours	1%
Conservation Treatment	73,000 cu. ft.	7,300,000 hours	73%
Total		9,983,941 hours	100%

⁵ NR textual preservation survey information drawn from *Preservation Survey Study of Textual Records: Office of Regional Records Services*, submitted by Preservation Programs, April 2006 (draft).

NL's definition of "appropriately processed" is similar to NW and NR's:

Records are considered processed when arrangement is established, basic preservation is completed, page-by-page reviews conducted, statutory or governing restrictions applied, are appropriately described, and requisite notifications completed to ensure records are open and available to the public.

NL's categories were driven by the laws that govern their holdings and shape their processes, including the need to perform access review on every document in those holdings. NL's categories include all processing activities, so there is no additional breakout for preservation. The NL categories are:

- 1) Series within the FOIA processing workload: the activities undertaken to arrange, preserve, review, and describe records identified as responsive to Freedom of Information Act (FOIA) requests
- 2) Series within the systematic processing workload: the activities undertaken to arrange, preserve, review, and describe a provenance-based aggregate (a series, a collection, etc.) of historical material
- 3) Series within the mandatory review workload: the activities undertaken to refer to equity-holding agencies classified records identified either through FOIA requests (Agency Referrals, AR) or requests for a mandatory review requests (MR requests)
- 4) Series within the Remote Archival Capture (RAC) workload: the activities undertaken to process classified records 25 years or older for scanning and equity review through the Remote Archives Capture (RAC) Project, a collaborative program among Presidential Libraries, the CIA, and other equity-holding agencies to implement the declassification provisions of EO 12958, as amended

NL Workload Analysis Survey Findings⁶

Processing Categories	Cubic Feet to be processed	Workload Hours	Percentage of Workload
Category 1 – FOIA	23,403 cu. ft.	9,012,385 hours	52%
Category 2 – Systematic	60,887 cu. ft.	7,976,061 hours	46%
Category 3 – Mandatory Review	217 cu. ft.	138,687 hours	1%
Category 4 - RAC	5,141 cu. ft.	86,731 hours	1%
Total Workload	89,648 cu. ft.	17,213,864 hours	100%

⁶ This survey does not include the William J. Clinton Library. It also does not include NL's special access review and PRA re-review workload.

Recommendation

- This study was intended to capture a snapshot of the current backlog. It did not examine why and how the backlogs developed, did not forecast future trends, did not analyze current processes for efficiencies, and did not identify and examine best practices. Any conclusions drawn in those areas, and certainly any action plans, would benefit from more focused analysis. Accordingly, we recommend that the agency's paper textual records workload should be identified by the NARA Risk Review Board as a significant agency-wide risk, and appropriate risk owners identified. The risk owners most likely will be from the program offices, and will have more detailed knowledge about the risks and mitigation strategies.

Appendix B

Management Comments



National Archives and Records Administration

8601 Adelphi Road
College Park, Maryland 20740-6001

Date: **FEB 16 2007**

To: **OIG**

From: **NL, NR, NW, and NPOL**

Subject: **OIG Draft Report 07-06, Audit of Textual Records Processing at NARA**

Thank you for the opportunity to comment on this draft audit report. This memo combines comments from the above named offices and includes copies of comments as received from individual offices. Please note that most of the individual comments predate the revised draft, and we have already discussed those items. The NPOL comments do include some additional corrective language that we hope you will consider for the final report. We appreciate the time spent in review of the initial draft report and the auditor's willingness to consider alternate language for portions of the report.

First and foremost, all offices strongly disagree with the implication that textual records processing at NARA should be reported as a material weakness. OMB Circular A-123, Management's Responsibility for Internal Control, provides clear guidance on when an internal control requires a declaration of a material weakness. The three objectives of internal control cited in A-123 are:

- Effectiveness and efficiency of operations,
- Reliability of financial reporting, and
- Compliance with applicable laws and regulations.

In the draft report, the auditor states: "We found that NARA is not currently providing efficient and effective access to, and information about, NARA holdings, and is not meeting its mission of ensuring public access to records as soon as legally possible." He cites the backlog of unprocessed records and those waiting description and entry into the Archival Research Catalog (ARC) as evidence of this condition. In fact, NARA customers are provided efficient and effective access to records and information about our holdings. It is also true that as findings aids and descriptions are entered into ARC our effectiveness and efficiency increases. These are not mutually exclusive, and the lack of an on-line method for searching all records does not mean that records are unavailable.

We do concur with the recommendations as revised and note that actions taken to satisfy recommendation 1b will be the same as for recommendation 2.

A handwritten signature in cursive script, reading "Susan M. Ashtianie".

Susan M. Ashtianie
Director
Policy and Planning Staff

Attachment