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[redacted] 85-65
3 October 1985

MEMORANDUM FOR: Chief, Information Management Staff

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THROUGH: [redacted]

FROM: IRMB Records Disposition Task Force

SUBJECT: Executive Summary - Records Review and Disposition Study

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1. At the request of C/[redacted] a task force was assembled to address problems within the records disposition program that had been surfaced earlier by [redacted]. The task force reviewed current records disposition programs to determine if disposition objectives are being met and identified ways to improve existing procedures to reduce DO file holdings.

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2. The study findings demand acceleration and logical management of the DO records disposition programs. A Review and Disposition component within IMS/[redacted] or IMS/[redacted] to handle all review and disposition efforts must be established. With the creation of this centralized component, procedures for current records disposition programs (201 File Review, review of inactive OPINT/OPACT files, and review of inactive files retired to Records Center) will be realigned to better conform with records disposition instructions contained in the DO Records Control Schedule. Federal laws, statutes, and regulations dictate responsibilities for an effective and efficient records disposition process as part of our overall records management program. Compliance with these protects DO interests administratively, fiscally and legally.

3. The records disposition process dictates the timely and systematic removal of temporary records and the designation of permanent records having sufficient historical and archival values to warrant immediate or later transfer to the National Archives and Records Administration (NARA) for permanent preservation. The nucleus of our records disposition process is the DO Records Control Schedule. Approved by NARA, the DO Records Control Schedule contains judgements about the life expectancy of each

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type of record and, based upon a systematic analysis of DO records, provides a set of instructions for their disposition.

4. Records disposition has a direct and indirect impact on the DO divisions. As file custodians, the divisions control the destiny of old material. This responsibility requires the review of their old records to determine whether they should be retained or destroyed. The general attitude from file custodians is that current viable information demands attention first. This current information is the lifeline and heart of existence in every area division - OPERATIONS. While the mission in the divisions is operations, IMS is faced with meeting its legal obligation to dispose of old material. Although little importance has been placed on records review by file custodians, significant backlogs at the area desks have been held to a minimum at the expense of time that would have been devoted to operations. This file review activity has been accomplished only through the continual reminders from IMS. As a result, we are wearing out our welcome when it comes to records disposition because the divisions have neither the personnel nor the time to devote to this activity.

5. The importance of disposing of old records is not readily apparent to file custodians. For IMS to effectively provide the exact information needed by division personnel to make informed operational decisions, disposal of old records is mandatory. Through this process, valueless index records are purged from the automated data base. As a result, IMS can expeditiously respond to name trace requests and eliminate time-consuming research required to locate files that have little or no relevance to any current operations.

6. There exists a serious need to accelerate the review and disposition of older, inactive classified material. Space limitations and storage costs preclude us from retaining inactive temporary records. Retaining useless automated index records not only impairs the overall efficiency of retrieving information from our automated data bases but also degrades our ability to respond to requests from the divisions. In addition to inactive material being unnecessarily accessible to FOIA/PA search and retrieval, the DO is not in compliance with federal laws and statutes.

7. A significant factor that will further impact the disposition process is the review of 3,956 feet of inactive retired material scheduled for review in 1988. The review of this large volume of material is a result of the tenth anniversary of the 1977/78 Records Review Task Force. Unless our records

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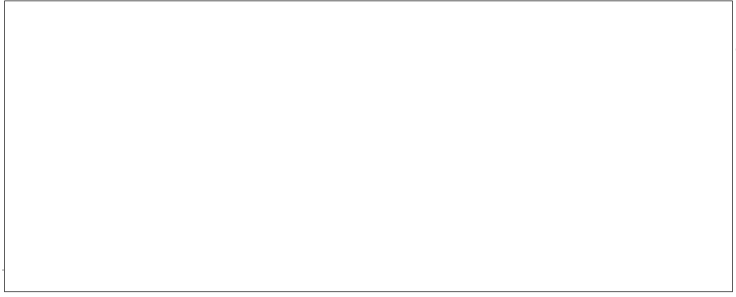
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disposition component is in place and operating, review of these records can only be accomplished through unorthodox means - "crisis management". Such action would mandate dedicating operations officers to review old records full time. The [redacted] Records Review Task Force was indeed an excellent example of "crisis management". Should history be allowed to repeat itself by resorting to this approach to review the 3,956 feet of material and the currently increasing backlog of inactive records?

8. The task force considers that existing backlogs will be reduced significantly and processing integrity enhanced by a single office dedicated solely to records disposition. Staffed by retired annuitants with established bona fides to review files, this function will no longer be performed by division officers. By consolidating all disposition functions under one unit having this total authority to dispose of inactive records (centralizing this effort versus delegating activities to several different components), redundancy in the review process will be eliminated and division officers can devote their full attention to operations; the Records Control Schedule will be followed to standardize the destruction, disposal and retention of inactive material, eliminating different interpretations in the review process; and efficiency and effectiveness will be promoted with less cost and time to meet our legal responsibilities. Ultimately, IMS will be rendering better overall support to the divisions.

9. Our Records Review and Disposition program needs immediate attention. Left unattended, the records disposition process transforms from timely and systematic management to "crisis management" governed by procedures that defeat the purpose to destroy outdated inactive material. Taken lightly, DO interests administratively, fiscally, and legally are no longer protected because of non-compliance with federal laws, statutes, and regulations.

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RECORDS REVIEW
AND
DISPOSITION STUDY

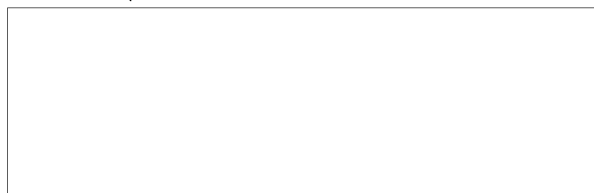
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I. INTRODUCTION

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An [] task force was assembled to study various aspects of the records disposition program as recommended by [] in a July 1984 memorandum (Attachment 1). This action was precipitated by problems [] personnel had addressed, all pertaining to various aspects of records disposition (Attachments 2 and 3). The primary objective of this study was to determine if a new component should be created to centralize a continuous review and removal of inactive temporary records. As part of the study, the task force focused on all activities and procedures within the records review and disposition process that would require immediate modification/update.

II. PROBLEM DEFINITION

A viable records disposition process dictates the timely and systematic removal of temporary records and the designation of permanent records having sufficient historical and archival values to warrant immediate or later transfer to the National Archives and Records Administration (NARA) for permanent preservation. Based on findings, these objectives are not being met.

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Problems exist in the entire records disposition process. The general attitude permeating all DO components involved is that current viable information demands attention first. The volume of this current information precludes immediate processing of old records. All components involved in the records disposition process, with the exception of the [] 201 File Review Section, are multi-tasked. The review and processing of old material takes place when time is available or after normal duty hours as an overtime project.

While the mission of the divisions is operations, as file custodians they are responsible to review their records for retention or destruction. Because the mission of IMS is to ensure that old material is reviewed for retention or destruction, IMS has been reminding file custodians to review old records. The divisions, having neither the manpower nor the time, are addressing records disposition at the cost of operations.

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[] individually reviews every document in a file, already authorized for destruction by the file custodian, to determine whether it meets current indexing criteria. If the document does indeed meet that criteria, then the [] analyst must find an appropriate active file to which the document can be reclassified. This process of reclassification itself is so extremely time-consuming that it is counterproductive to the entire review effort and thwarts compliance with federal laws, statutes, and regulations.

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III. FINDINGS

In 1981, a long-term program for the reduction of file holdings was proposed by [redacted] and approved by C/IMS (Attachment 4). The task force found that since implementation of that program, necessary improvements are required to the records disposition process to promote its efficiency and effectiveness.

- Division file custodians are required to review old file material at the cost of operations.
- Of circa 3,500 OPINT/OPACT files sent to the divisions for review since July 1982, approximately 3,000 files have been returned for [redacted] processing. Additionally, 673 cubic feet of retired records were reviewed and 620 individual 201 files were reviewed by the divisions during FY 1985
- Sending OPINT/OPACT files to the divisions for review has been suspended since 14 December 1984 to keep existing backlogs to a minimum at the area desks, [redacted] and [redacted]
- Many of the 500 files remaining at a select few operating branches within the divisions have been pending review since 1982 because they have neither the manpower nor time to address disposition of those files.
- Due to insuffiicient manpower, reviewing old records is delegated to new, inexperienced, and untrained CTs or IAs having no authority over disposition of the records. The ability to determine whether inactive files should be retained or destroyed is questionable.
- The growth rate of records far exceeds the purge rate.
- Current records disposition programs place the emphasis on expediting the review process instead of the destruction process.
- The life cycle of index records is indefinite. Criteria for retention of index records in ALLSTAR does not parallel the disposition instructions provided for the corresponding paper records in the DO Records Control Schedule, i.e., All documents are reviewed to determine if they meet current indexing criteria regardless of the final disposition of the file (i.e., destruction or retirement). This secondary review is part of the Procedure to Authorize the Destruction of Records in Agency Archives and Records Center (Form 141b process)

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and the OPINT/OPACT Project Procedure (applied to pre-1962 documents) (Attachment 5).

- Disposition processing procedures do not meet destruction objectives for valueless inactive records and are in conflict with criteria for retention of index records in ALLSTAR. As a result, indexed documents are given a whole new life cycle as they are reclassified into an active file. When this file becomes inactive and reviewed for disposition, the cycle repeats.
- Manpower resources [] allocated to the records disposition effort are insufficient to handle the large volume of inactive records to be processed.
- During the first quarter of FY 85, 250 files per month were sent to the divisions to be reviewed. During this same period, 50 files per month were processed by []
- Since the beginning of FY 83, [] has expended 9,093 overtime hours, costing \$134,910 (based on an rate of \$15.00 per hour, time and a half), to process 1,249 files. This equates to approximately 63,438 documents, 5,017 of which were retained.
- The majority of processing of inactive records takes place within [] Production goals have never been established for [] responsible for performing review and disposal of inactive records. These offices are dedicated primarily to processing active records which take precedence over processing inactive material.
- Records disposition statistics in [] reveal 10 documents per hour processed during normal duty hours; on overtime, 30 documents per hour are processed.
- The administration of current review and disposition exercises is decentralized. Several components are involved and this, in turn, affects the general flow of and the overall efficiency of the program.

A. Procedure to Authorize the Destruction of Records in Agency Archives and Records Center (Form 141b process) - This is an on-going project to review files retired to Records Center according to the DO Records Schedule []
 Personnel/Components Involved: Division/staff IMO, division/staff personnel, []
 [] OGC, and DDA/OIS

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B. OPINT/OPACT Project Procedure -

This is a long term project to review operational and subject files closed prior to 1962 and held in

[redacted]
Personnel/Components Involved: [redacted]
Division/Staff IMO, Division/Staff personnel,
[redacted] OGC, and [redacted]

C. 201 File Review and Destruction Procedure -

This is a long term project to review 201 personality files open prior to 1962.

Personnel/Components Involved: [redacted] 201 File
[redacted] division/staff IMO,
division/staff personnel, OGC, and CI Staff.

D. Top Secret Document Review Project -

This is a short term periodic project to review top secret documents. This could become a long term review project if and when [redacted] is required to conduct a review of their entire top secret holdings which amount to approximately 91.6 linear feet.

Personnel/Components involved: [redacted]
division/staff IMO, division/staff personnel,
[redacted] OGC, DDA/OIS, and [redacted]

- ° Statistics show that the [redacted] 201 File Review Section, staffed by part-time employees who are dedicated solely to reviewing 201 files for disposition, processes an average of fifty percent more files than the other IMS components.

IV. RECOMMENDATIONS

Our Records Review and Disposition program needs immediate attention. Current DO procedures for processing inactive records are not fully meeting the objectives to destroy material no longer of use. Rather it has been the rule to recycle documents, that is, retain information to be reviewed again sometime in the future.

IMS must absorb the review function from file custodians because division officers are required to spend an inordinate amount of time away from operations to review old inactive records.

Based on the findings of this study, it is recommended that one component be created, consolidating all disposition programs, and having total authority to dispose of valueless inactive material. All disposition programs must be governed by the Records Control Schedule as the authority for destruction or retention of inactive records.

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It is imperative that current disposition processing procedures be analyzed for incongruities related to retention of paper records versus index records, and be modified to be realistic, definitive, and closely aligned with disposition instructions in the Records Control Schedule as they relate to the destruction of inactive material.

Recommendation 1:

Revise Procedures

Immediate changes in our disposition procedures are mandatory to promote the timely and systematic destruction of inactive paper and accompanying digital records. Indexing criteria currently utilized in the records disposition process is the major source for delay and concern in the disposition process. Realistic and improved indexing criteria must be established for application in processing older inactive records as they do not have equivalent value of current information (e.g., is it necessary to the DDO to index the names of persons who are 90-100 years old ? - presently occurring).

Recommendation 2.

Establish Review and Disposition Office

A centralized Records Review and Disposition component is essential to effectively carry out the overall objectives of the DO records disposition program. The task force recommends the creation of this component within [redacted] IMS. Information Management Staff (IMS) has the overall responsibility in the DO for the disposition of records. Chief, [redacted] IMS is responsible for and, for legal purposes, the custodian of the centralized indices and files held within IMS. This new component must be dedicated entirely to performing records disposition functions, initiating the disposition proceedings, controlling the flow of files or documents, and having total authority for the disposal (destruction or retirement) of inactive records. All current disposition programs must be consolidated, centralized, and managed by this newly established component.

Recognizing the realities in attempting to immediately establish a Records Review and Disposition component and obtaining the needed slots and personnel that are requisite, the following phase-in method is offered:

- ° Phase I - Revise Procedures - Change procedures as indicated in Recommendation 1.

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- Phase II - Consolidate Programs - Those individuals in [redacted] 201 File Review Section currently involved in the records disposition process will form the foundation of this new component.

All retirements of files to Records Center will be processed through this office; to include updating retirement data into the CARD system, verifying audits from CARD, purging CARD records of destroyed material, and updating the ALLSTAR automated data base.

- Phase III - Delegation of File Disposition Authority - The role of the area division in the records disposition process is small but extremely important. As file custodians, they review the file or document to determine the disposition, thus the decision to retain or destroy rests solely with the file custodian. Custodial responsibility will be delegated by the divisions to a representative (area division officer or annuitant) who must have the independent authority to make disposition decisions.

- Phase IV - Analysis and Evaluation of Staffing and Grade Structure - The following organization and initial grade structure is suggested:

Chief -- GS- 14 Information Managment Analyst

This individual must be thoroughly knowledgeable of laws governing the disposition of Federal records, specifically the DO Records Control Schedule; must have good understanding of the ALLSTAR system and have knowledge of or experience in DO operations.

Deputy Chief -- GS-11 or GS-12

Must have qualification same as or close to those of the chief.

Control Clerk -- GS-6 or GS-7

Would provide administrative and logisitical support; control flow of material within office; assign records to appropriate analyst.

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201 FILE Unit - 8 employees GS-7 through GS-12

Experienced Area Division and IMS officers. Must be able to research and update ALLSTAR data base. (Area division officer should have independent authority to make decisions.)

OPINT/OPACT and Retired Review Projects - 10 Employees
GS-7 through GS-12

Experienced Area Division and IMS officers. Must be able to research and update ALLSTAR data base. (Area division officer should have independent authority to make decisions.)

Records Retirement Unit - 4 Employees GS-6 through GS-8

Experienced DO and IMS employees. Must be able to research and update ALLSTAR data bases.

This staff of approximately 26 employees could be comprised of rehired annuitants, full-time employees, and part-time employees. Staffing of this component could be reduced 50% after the 1988 file review requirement is completed.

V. CONCLUSIONS

Throughout the evolution of the DO Records System, most responsibilities that were held by the divisions have been subsequently delegated to IMS as records experts. However, the responsibility and authority to determine the disposition of inactive records still remains within the divisions. The rapid turnover and inexperience of personnel as well as insufficient manpower in the divisions dictate a change from decentralized file review functions.

This situation warrants a change in the responsibilities, authorities, and associated procedures that govern records disposition today. A central review and disposition component will facilitate a long-term program for the reduction of inactive file holdings. This component will have the responsibility, authority, and expertise to formulate decisions regarding the retention or destruction of inactive records, freeing up the divisions to devote their time to operations.

The future, 1988, signals the review of 3,956 inactive retired records, the tenth year anniversary of the (Attachment 6). By centralizing the entire program under one independent authority and devising procedures pertinent to inactive records closely aligned to disposition instructions in

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the DO Records Control Schedule, overall program efficiency is promoted through the disposal of all valueless paper and corresponding digital records.

The progressive program developed today will benefit the DO and the Agency now and for years to come.

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