

Central Intelligence Agency



Washington, D.C. 20505

8 April 2004

Dr. Michael J. Kurtz  
Assistant Archivist for  
Records Services - Washington, D.C.  
National Archives and Records Administration  
8601 Adelphia Road  
College Park, Maryland 20740-6001

Dear Dr. Kurtz:

(U) Since our last correspondence on 15 December 2003, we have taken the requested actions to close out nine more of the recommendations in your Evaluation of the CIA Records Management System. The attached progress report details our actions with respect to the following recommendations: II/1b, II/6, II/8, III/3, III/5a, III/6, VI/1, VI/2, VI/5.

(b)(3)

(U//~~FOUO~~) We look forward to meeting with you to review the complex issues of the recommendations that remain open.

Please call [redacted] or me [redacted]

[redacted] at your convenience after you have reviewed our progress report.

Sincerely,

[redacted signature box]

Acting Director  
Information Management Services  
Chief Information Officer

Enclosure

Recommendation II/1b:

(U) Telephone conversations should be documented through Memorandums to the File.

Action Items Identified from Latest Correspondence:

- (b)(3)
- (U) Modify [redacted] as noted by NARA.
  - (U) Provide NARA with a copy of the draft guidance on documenting telephone conversations and creating memorandums of conversation.

CIA Response:

(b)(3)  
(b)(5)

[redacted]

(U) The need to document telephone conversations and create memorandums of conversation has been referenced in our Information Management Computer Based Training (CBT) and in the Employee Bulletin on "Records Responsibilities of CIA Employees and Managers", which was reissued on 3 October 2003.

(b)(3)

Furthermore, [redacted] also cover the need to document telephone conversations. As such, we believe adequate mention has been made to reinforce the employees' record responsibilities with regard to telephone conversations.

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Recommendation II/6:

(U) 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.

Action Items Identified from Latest Correspondence:

(b)(3)      ▪ (U) Modify [redacted] to require a review by ARC staff of the assigned disposition authority.

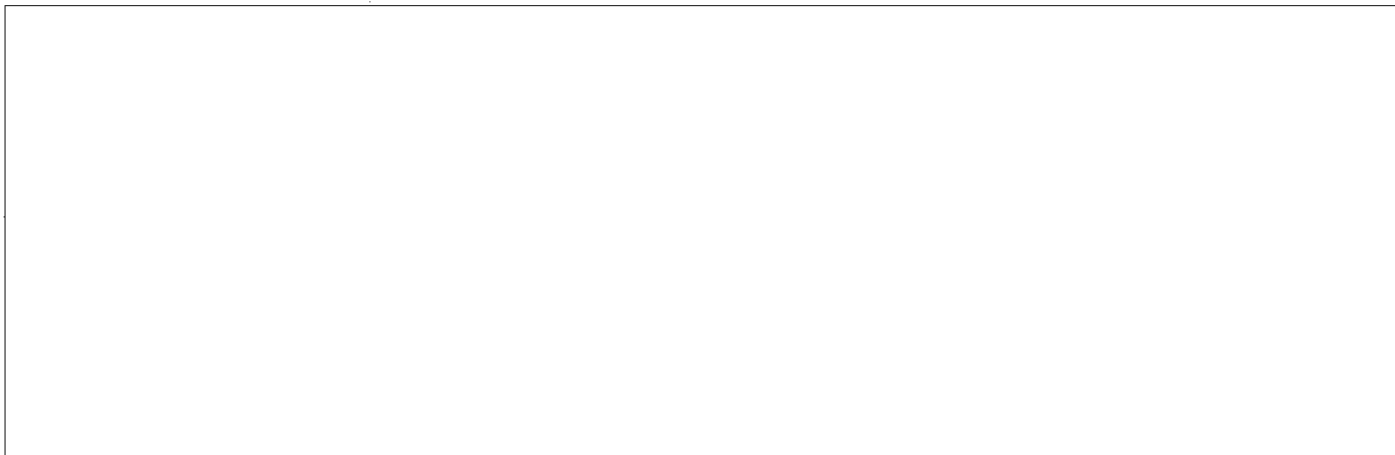
(b)(3)      ▪ (U) Further modify [redacted] as noted by NARA.

CIA Response:

[Large redacted area]

(b)(3)  
(b)(5)

(b)(3)  
(b)(5)



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Recommendation II/8:

(U) Continue the recent initiatives to revitalize the Vital Records Program.  
(b)(3) Ensure [redacted] that IMOs continue reviewing older vital records in the ARC and identifying more recent vital records.

Action Items Identified from Latest Correspondence:

- (b)(3)
- (U) Modify [redacted] as noted by NARA.
  - (U) How will the CIA ensure that it will have access to the needed information if the original records are lost or destroyed?

CIA Response:

(b)(3)  
(b)(5) [redacted]

[Classified information was omitted from this section in an effort to reduce the classification level of the entire document.]

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Recommendation III/3:

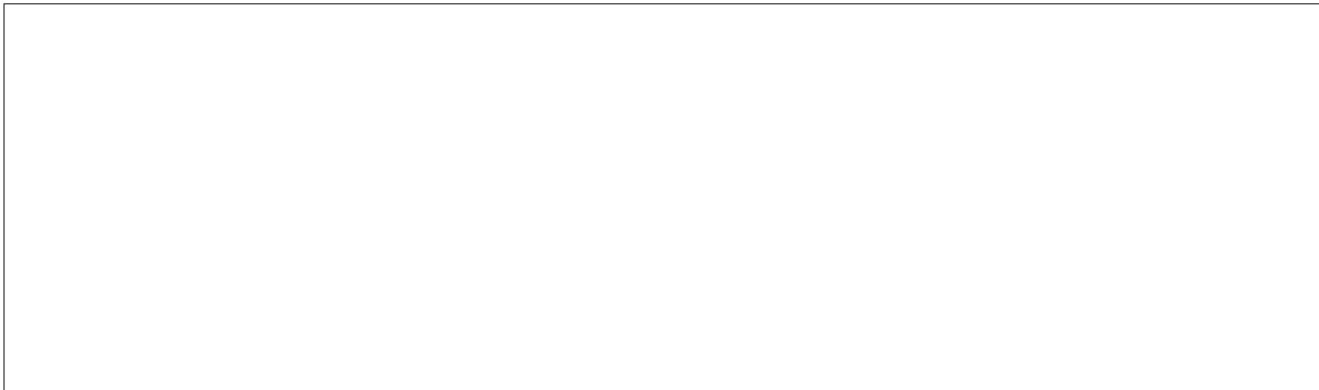
(U) Ensure that all staff are familiar with the schedules that cover the records they accumulate.

Action Items Identified from Latest Correspondence:

- (U) The section of the PERM General User Training on "Agency Records" should be revised to read "documents, e-mail, and other materials that records office organization, functions, policies, decisions, procedures, activities, and essential transactions."
- (U) The section of the PERM General User Training on "Agency File Plan Benefits" should be modified by deleting the reference to links to approved Agency Records Control Schedules.

CIA Response:

(U) The section of the PERM General User Training on "Agency Records" (attachment #7) has been revised according to your 17 April 2003 response.



(b)(3)  
(b)(5)

**Recommendation III/5a:**

(U) 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 records status of working files, [REDACTED]

(b)(3)

**Action Items Identified from Latest Correspondence:**

- (U) Revise all handbooks and regulations to incorporate the results of the new schedule on working files, and issue a new Employee Bulletin that conveys that information to all employees.
- (U) Expand the PERM General User Training on "Agency Records" to include more details as noted in Recommendation III/3.
- (U) What provisions or mechanism exist to ensure that documents marked "draft" [in PERM] are re-categorized as "final" when that stage is reached?
- (U) What provisions are there to ensure that documents marked "draft" in PERM will be preserved as called for in the revised schedule for working papers?

**CIA Response:**

(U) The *Agency Records Control Schedules* database, as well as any handbooks or regulations referencing working files, has been updated to reflect the new schedule on working files. The Employee Bulletin entitled "Update to the Agency's Record Control Schedules" (attachment #8) has also been issued to notify the Agency of this fact.

(U) The section of the PERM General User Training on "Agency Records" (attachment #7) has been revised according to your 17 April 2003 response.

(U) Once a document is deposited into PERM, it cannot be edited from within the PERM repository. If a user wishes to modify a document existing in PERM, a copy is made to their local desktop where they can then make necessary modifications. Once the modifications are completed, the revised document is re-deposited and held alongside the original version within the same file tag. This also holds true for documents marked "draft". All "draft" versions of a document are held with the "final" version and are available for a user to search on and view. Therefore, documents are never re-categorized within PERM. It is the user who re-deposits it as such when the document has reached final completion.

(U) The new schedule on working papers calls for drafts and other work papers to be filed in an "appropriate recordkeeping system with the final version of the document to which they relate". As noted in the previous paragraph, PERM complies with this instruction. All related documents are held together in the same file tag and inherit the approved disposition of the file series. Currently, all documents in PERM are being treated as permanent until such time as NARA approves our Record Control Schedules for application to electronic records.

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Recommendation III/6:

(U) 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 NC1-236-85-1, Item 1e.

Action Items Identified from Latest Correspondence:

- (U) Modify the Employee Bulletin on "Records Responsibilities of CIA Employees and Managers" as noted by NARA
- (U) Modify the Information Management Checklist as noted in previous recommendations.
- (U) Explain how, other than through guidance, you are ensuring that Chronological files used as finding aids or indexes are being retained for as long as the records to which they provide access.

CIA Response:

(U) Per letter dated 15 December 2003, the Employee Bulletin on "Records Responsibilities of CIA Employees and Managers" has been modified and reissued in accordance with your 17 April 2003 response.

(U) The IM Checklist was replaced by the IM Survey, which was implemented during the period January through March 2003. Our 15 December 2003 letter contains additional details regarding the IM Survey.

(U/~~FOUO~~) Component IMOs have an ongoing responsibility to ensure the offices to which they are assigned are following established recordkeeping practices. This includes ensuring that materials, such as finding aids, are being maintained in accordance with approved disposition authorities. Moreover, the annual IM Survey is used to identify areas that may not be in compliance with established recordkeeping practices. Once the data is compiled, specific recommendations are made and resources are allocated to assist areas in improving their recordkeeping programs.

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Recommendation VI/1:

(U) 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 [redacted]

(b)(3)

Action Items Identified from Latest Correspondence:

- (U) Modify [redacted] the Employee Bulletin on "Non-Textual Records Preservation" as noted by NARA.

(b)(3)

CIA Response:

(b)(3)

(b)(5)

(U) Per our letter dated 15 December 2003, the Employee Bulletin on "Non-Textual Records Preservation" has been modified and reissued in accordance with your 17 April 2003 response.

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Recommendation VI/2:

(U) Use formats that conform to 36 CFR 1232.30 for permanent and unscheduled video recordings.

Action Items Identified from Latest Correspondence:

- (b)(3)
- (U) Modify the Employee Bulletin  as noted in previous recommendations.
  - (U) Describe the steps the Agency will be taking to ensure that permanent video recordings are produced on archival media.

CIA Response:

(U) Per our letter dated 15 December 2003, all Employee Bulletins have been modified and reissued in accordance with your 17 April 2003 response.

(b)(3)  
(b)(5)

(U/~~FOUO~~) Component IMOs are responsible for overseeing the preservation process within the offices to which they are assigned. This includes ensuring that records originated in audio/visual formats are produced and maintained in accordance with 36 CFR § 1232. In the same way that component IMOs direct the use of acid-free folders and boxes for permanent record material existing in paper form, they also ensure the use of archival media for permanent record material existing in audio/visual formats, such as video recordings. If, during their verification procedures, the Directorate IMO determines that proper preservation procedures have not been observed, the job is returned to the component IMO for remediation. A job is only sent to the ARC once the Directorate IMO is satisfied with the preservation proceedings.

(U) All Agency officers are also periodically reminded of their responsibilities to preserve audio/visual record material through the issuance of Employee Bulletins. The most recent one entitled "Non-Textual Records Preservation" was revised and reissued in accordance with your 17 April 2003 response.

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Recommendation VI/5:

(U) 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 containing in accessions retired to the ARC prior to 1978.

Action Items Identified from Latest Correspondence:

- (b)(3)
- (U) Modify [redacted] the Employee Bulletin on "Non-Textual Records Preservation" as noted by NARA in Recommendation VI/1.
  - (U) Allow NARA to reinspect the ARC.

CIA Response:

(b)(3)  
(b)(5)

[redacted]

(U) Per our letter dated 15 December 2003, the Employee Bulletin on "Non-Textual Records Preservation" has been modified and reissued in accordance with your 17 April 2003 response.

(b)(3)

(U//~~FOUO~~) NARA staff is welcome to visit the ARC. Please contact [redacted] Chief/RCMG, [redacted] to schedule an appointment.

(b)(3)

(b)(3)

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