



## National Archives & Records Rocky Mountain Region



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# The Rocky Mountain Record

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## Taking Stock of Your Agency's Records Program

Effective records management programs depend on the systematic creation and maintenance of agency records and on an organized approach to the disposition of records when they are no longer needed for current government business. One important way to help ensure that RM programs remain effective is through an **evaluation**. A records management evaluation is an inspection, audit, or review of records management programs to ensure that, among other things:

- work processes are being adequately documented;
- information is found when needed;
- retention requirements are being followed through systematic destruction and/or timely transfer of permanent records to NARA.

Conducting an evaluation helps you and your agency have a successful records management program by protecting the government from the risk of litigation, the risk of the Government not being accountable for its actions, and the risk of not protecting the rights of the American public. The regulatory authority for agency records management self-evaluations is found in 36 CFR



1239.01-04, "Agency Internal Evaluations". This regulation states that periodic records management evaluations are required of Federal agencies and the evaluations must focus on records creation and recordkeeping requirements, the maintenance and use of records, proper records disposition, proper schedule implementation, and compliance with NARA records management regulations. The regulations are broadly written so that each agency can best implement the evaluation to meet the needs of the entire agency and its functions, program offices, headquarters and field offices, media, still photos, electronic records, and motion pictures, offices and programs affected by reorganizations, and offices with new programs mandated by legislation.

Your agency's RM directives are key ingredients in establishing an evaluation program. Directives should provide records management requirements for programs and serve as the basis for your evaluations. They should also provide you with authority to perform evaluations, and you should cite this authority when actually performing evaluations. In turn, your evaluation program should be based on compliance with your agency's records management directives. You

*(Continued on page 2)*

*(Continued from page 1)*

should ensure that agency directives are complete and up-to-date. Evaluations can be a test of whether your directives are complete or outdated, as well as a test of whether there is compliance.

There are several critical success factors for evaluating records management programs: ensuring adequate and proper documentation; preserving function-work process information; identifying and mitigating risks of record loss; safeguarding vital records; minimizing litigation risks; improving operating costs, and improving work process efficiency and output.

What guidance currently exists to help agencies conduct evaluations? NARA's Knowledge Area 6 "Records Management Program Development" workshop contains a module on how to perform RM evaluations. Additionally, the NARA Self-Evaluation Guide, found at - [www.archives.gov/records-mgmt/publications/records-management-self-evaluation-guide.html](http://www.archives.gov/records-mgmt/publications/records-management-self-evaluation-guide.html) , provides a template that agencies can use for their own evaluations. Within the Self-Evaluation Guide, a series of hyperlinks connect you to specific checklists of questions related to specific records management topics. This guide was developed as an overview of the basic components of a records management



program. It is provided to help agencies implement the requirement to conduct self-evaluations. Using this guide will assist agencies in making a preliminary assessment of the status of their records management programs, and in identifying major problems and setting priorities for program improvements.

Although the self- evaluation guide provides a framework for general evaluation of a records

management program, agencies that wish to conduct a more in-depth review may add more specific questions based on other NARA records management publications. Agencies may also modify or add questions to accommodate specialized records and recordkeeping practices.

Evaluation best practices in Federal agencies include, among others, Environmental Protection Agency (EPA), Department of the Army, and the Department of the Interior (DOI).

EPA has created a toolkit to assist its Programs and offices to implement the Federal requirement to conduct self-evaluations. The toolkit can be found at [www.epa.gov/records/tools/toolkits/evaluat/index.htm](http://www.epa.gov/records/tools/toolkits/evaluat/index.htm) . Downloading and adapting the EPA self-evaluation tool kit will assist your own programs and offices to make a preliminary assessment of the status of their records management programs, identify major problems, set priorities for program improvements, and assist in the development of your own comprehensive records management program.

The Department of the Army's Pamphlet 25-403, "Guide to Recordkeeping in the Army," at [http://www.army.mil/usapa/epubs/pdf/p25\\_403.pdf](http://www.army.mil/usapa/epubs/pdf/p25_403.pdf) (Chapter 11) establishes procedures for conducting self-evaluations of the records management programs. Internal evaluation checklists are provided. It allows Army commanders to assess their programs periodically, and to comply with established internal controls and evaluation-tasking from Army headquarters.

The DOI best practices toolkit for a comprehensive questionnaire for records/information managers, current state of records in bureaus, can be found at <http://www.archives.gov/records-mgmt/toolkit/pdf/ID237.pdf> .

The DOI toolkit provides an example of one agency's comprehensive questionnaire used to evaluate the current state of its records management programs as an initial step in developing an enterprise-wide ERM solution.

The following are suggested high-level steps in conducting an evaluation:

In planning an evaluation consider the following: what is the scope of the evaluation, what logistics are needed, what information-gathering techniques should be used, and who needs to be informed?

In conducting the evaluation you should first secure written and verbal approval from senior management, conduct background research, perform an in-briefing to the program offices that will be evaluated, distribute information to subject program staff, distribute materials that may be needed for the evaluation, and then actually perform the evaluation.

Once the evaluation is completed you will then need to: analyze your collected data; describe your findings and conclusions; identify specific problems; emphasize the probability of risks to the agency or public; make your recommendations; use an appropriate report format for your agency or program office so the evaluation report will be easily recognized as an official report that the program office must respond to; use appropriate report titles; obtain appropriate clearances, and distribute the official final report.

At this point, you should implement the recommendations and follow up on progress. You will need to work with the program offices to prepare action plans to implement the recommendations, and create milestones for fulfilling recommendations. Obtain agreement from each program office to commit to an action plan, and have your office commit the means to assist them. Track the progress of the action plan in implementing the recommendations; and close out the recommendations when they reach a satisfactory completion or progression of the milestones to meet the requirements of the recommendations.

How will you know how you are doing? Re-examine your goals, check against the critical success factors, and investigate best practices in records management.

What is NARA's role in the evaluation process? NARA is legally mandated to conduct evaluations

of Federal agencies' records programs. In past years NARA would determine which agencies would be evaluated, then officially contact each agency to be evaluated, make visits and conduct interviews, prepare an evaluation report of findings and an action plan, and present it to head of the agency.



Currently, NARA uses a different approach. In September 2009 agency records officers were notified of a new requirement to complete an annual, on-line self-assessment questionnaire designed to provide high-level information about agencies' RM programs in order to allow NARA to assess individual agency compliance with the Federal Records Act. One of the outcomes of the annual self-assessments is that NARA will determine when it needs to undertake individual agency inspections, for instance, when an agency displays a chronic unwillingness to rectify long standing or egregious issues of non-compliance, as revealed in self assessment responses or by other means.

Under 44 USC 2904(c)(8), the Archivist of the United States is required to report to Congress and OMB annually on the results of records management activities. NARA fulfills this requirement through the Performance and Accountability Report. A section of this annual report recognizes agencies who have made special achievements with their RM programs, but it also reports challenges and risks to agency records as a result of poor recordkeeping practices and policies by specific agencies named in the report. This is another reason why it is important for each agency to conduct regular RM program evaluations.

## FY-2010 NARA Rocky Mountain Region Workshops

Date	Course Title	Location
March 24-25, 2010	Creating and Maintaining Agency Business Information (KA-2)	Albuquerque, NM
March 30-31, 2010	Records Scheduling (KA-3)	Albuquerque, NM
April 1-2, 2010	Records Schedule Implementation (KA-4)	Albuquerque, NM
April 6-7, 2010	Asset and Risk Management (KA-5)	Albuquerque, NM
April 8, 2010	Records Management Program Development (KA-6)	Albuquerque, NM
April 20-21, 2010	Creating and Maintaining Agency Business Information (KA-2)	Denver, CO
April 22-23, 2010	Records Scheduling (KA-3)	Denver, CO
May 3-4, 2010	Records Schedule Implementation (KA-4)	Denver, CO
May 5-6, 2010	Asset and Risk Management (KA-5)	Denver, CO
May 7, 2010	Records Management Program Development (KA-6)	Denver, CO
June 23-24, 2010	Electronic Records Management (ERM)	Denver, CO
July 13, 2010	Basic Records Operations (BRO)	Billings, MT
July 15, 2010	Basic Records Operations (BRO)	Bismarck, ND
August 4-5, 2010	Emergency Planning and Response for Vital Records and Essential Information (EVE)	Albuquerque, NM
August 10, 2010	Electronic Records Forum	Denver, CO

Register for workshops and briefings through:  
<http://nara.learn.com/recordsmanagement-training>  
 Or request a registration form by e-mailing us at:  
[workshop.denver@nara.gov](mailto:workshop.denver@nara.gov)  
 Call: (303) 407-5720 or Fax: (303) 407-5731

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