Management of Hard Copy Mapping Products in the National Geospatial-Intelligence Agency

<u>Inspection Report</u>

NATIONAL ARCHIVES

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Executive Summary

In 2011, the National Archives and Records Administration (NARA) inspected elements of the records management program of the National Geospatial-Intelligence Agency (NGA). This effort was conducted under the authority granted by 44 U.S.C. 2904(c)(7) and 2906 to conduct inspections or surveys of the records and records management programs and practices within and between Federal agencies. The inspection focused on the transfer of permanent hard copy map products to the physical and legal custody of the National Archives of the United States. The inspection also included a review of NGA's records management program, particularly as it operates within the Directorates responsible for developing map products. Electronic versions of hard copy map products and any unique electronic products will be covered by a separate inspection and subsequent report in Fiscal Year 2012.

The inspection was prompted by concerns that NARA has not received regular transfers of hard copy maps and charts since NGA's predecessor, the National Imagery and Mapping Agency (NIMA), was stood up in 1996. According to NGA's records control schedule, the record copy of each published map product and of each special map product is a permanent record to be transferred to the National Archives. In addition to concerns about the lack of consistent transfers, NGA had weak scores on their 2009 and 2010 NARA-mandated Records Management Self-Assessments, which considered records management practices throughout the agency.

For this inspection, NARA received the full cooperation from NGA, including representatives from the Office of the Chief Information Officer, the Records Services Office, the Source Operations and Management Directorate, the Analysis and Production Directorate, and the Enterprise Operations Directorate.

This inspection involved visits to 20 separate NGA offices, in four facilities located in three regional areas (Bethesda, MD; St. Louis, MO, and Arnold, MO; and Gila Bend, AZ). The majority of the offices visited were in the Source Operations and Management Directorate (S Directorate) and the Analysis and Production Directorate (P Directorate), the two directorates responsible for developing map products.

While the inspection uncovered deficiencies in NGA's records management processes, NGA does have several elements of an effective records management program: the agency's records schedules cover many program records, the agency has issued a records and information management directive that provides guidance to staff, and the agency has begun to appoint a network of Information Officers (IOs) throughout the agency who will perform key records and information management functions.

The NGA records management program, however, does have shortcomings that need to be rectified to ensure the agency's compliance with federal records management laws and regulations. These include limited awareness by NGA staff of the agency's records and information management program—and hence NGA, DoD, and NARA requirements and regulations; poor implementation of the NGA records schedule covering geospatial publications and special products; and an overall lack of established records management processes that ensure the proper disposition of records.

As part of the inspection, NARA makes nineteen recommendations for remedial action that are described in detail in Section IV of this report and listed in Appendix A.

To ensure completion of the recommendations, as part of the inspection process NGA will be required to develop an Action Plan that specifies how the agency will address each report recommendation, including a timeline for completion. NARA will analyze the proposed remedial actions and work with NGA on ensuring the adequacy of the plan. After plan approval NARA looks forward to continuing a cooperative relationship with NGA and assisting with the follow-on items in the Action Plan.

I. Introduction

Background

The National Geospatial-Intelligence Agency (NGA) is a major combat support agency of the Department of Defense and a member of the Intelligence Community. NGA was established in 2003 and assumed the functions of its predecessor agency, the National Imagery and Mapping Agency (NIMA), which was stood up in 1996. NGA's mission is to provide imagery, imagery intelligence, and geospatial information, including maps and navigational charts, in support of national security objectives. NGA mapping functions are critical to carrying out military actions, disaster mitigation efforts, and other significant activities of the Federal government.

Scope and Purpose of the Inspection

NARA conducted this inspection of the National Geospatial-Intelligence Agency (NGA) in the fall and winter of 2010-2011, under the authority granted to NARA by 44 U.S.C. 2904(c)(7) and 2906 "to conduct inspections or surveys of the records and the records management programs and practices within and between Federal agencies." The goal of inspections is to review records management practices and provide recommendations for improvement. For this inspection NARA received exemplary cooperation from NGA, including representatives from the Office of the Chief Information Officer, the Records Services Office, the Source Operations and Management Directorate, the Analysis and Production Directorate, and the Enterprise Operations Directorate.

The primary purpose of this inspection is to examine the process associated with the timely transfer of permanently valuable hard copy mapping products to the National Archives of the United States. NGA creates a variety of published and non-standard maps and charts. Published products are widely available to other Federal entities through a subscription service operated by the Defense Logistics Agency (DLA). These published products are identified in the NGA records schedule as permanent under Series 801-10, Geospatial Publication Record Set.

NGA also develops non-standard or special one-time products, usually in response to a specific request from a policymaker, the Department of Defense, or another Federal agency. Non-standard products are not available through the subscription service. They are scheduled as permanent under Series 801-11, Special Projects and Non-Standard Products. Project history files, which are case files containing records related to the final products, are also identified for permanent retention under Series 801-08, Geospatial Project History Files. Although these related case files were considered under this inspection, the main focus was on the products themselves, which are of greatest interest to researchers after transfer to the National Archives.

NARA chose to inspect NGA because of the importance of the agency's records and because of NARA concerns that NGA's permanent map products are not being transferred to the National Archives as appropriate. Although the NGA records schedule mandates the transfer of a record copy of each edition of each map or chart to the National Archives upon publication, NARA has not received regular transfers of maps and charts since NGA's predecessor, NIMA, was stood

up in 1996. In addition, NGA had weak scores on their 2009 and 2010 NARA-mandated Records Management Self-Assessment, which considered records management practices throughout the agency.[1]

This inspection examines locating and transferring overdue legacy holdings, reinstating the regular transfer of all published hard copy maps and charts on a day forward basis, and identifying special one-time products produced in hard copy and establishing procedures to ensure their eventual transfer to the National Archives. The inspection also addresses related issues such as the status of legacy project history files and the need for improved procedures for management of project history files in general, improved records management procedures in offices that develop and support map products, the record status of rare maps in a legacy collection, specialized access restrictions on map products, and unauthorized disposition of records.

The disposition of the electronic versions of the above hard copy map products and any unique electronic products will be covered by a separate inspection and report in Fiscal Year 2012.

To carry out the inspection, NARA reviewed records and recordkeeping practices in representative offices of the two NGA directorates primarily responsible for the development of map products: the Source Operations and Management Directorate ("Source") and the Analysis and Production Directorate ("Production"). The inspection also included a few offices of the Enterprise Operations Directorate ("Enterprise") that support the production (including printing), storage, and dissemination of the products.

The NARA inspection team, accompanied by NGA staff, visited 20 offices located at NGA Headquarters in Bethesda, MD, at two major facilities in St. Louis, MO, and at a storage facility in Gila Bend, AZ. The inspection did not cover every office within the three directorates; instead, NARA inspected the offices that NGA identified as the ones most likely to produce or be involved in the production of hard copy mapping products.

Structure of the Report
Following this Introduction, this report has three sections. Section II provides an overview of the NGA Records Management Program. Section III describes the production of the maps and charts that are the main subject of this inspection. Section IV presents the inspection's findings and related recommendations for improvement.

There are four appendices. Appendix A is a consolidated list of recommendations resulting from the inspection findings. Appendix B is the NGA organization chart. Appendix C lists the offices visited during the inspection. Appendix D summarizes NGA and NARA procedures to follow up the recommendations in this report, as specified in 36 CFR 1239.26.

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[1] NGA scored 42 out of 100 in the 2009 self-assessment and 60 out of 100 in the 2010 self-assessment. See page 11 of this report for the citation to NARA's reports on the self-assessments.

II.   NGA Records Management Program

Program Requirements
According to 44 U.S.C. 3101 and 3102, Federal agencies are required to make and preserve adequate and proper documentation of their functions and activities, and to establish and maintain an active and continuing records management program. As part of these responsibilities, agencies are required to cooperate with NARA to "promote the maintenance and security of records deemed appropriate for preservation [44 U.S.C. 3102 (2)]." An effective records management program is an important factor in creating and preserving the information needed by a Federal agency to accomplish its mission and to preserve the documentary history of the United States. In addition, the Archivist of the United States is authorized by 44 U.S.C. 2107 to direct and effect the transfer to NARA of permanent records when 30 years old, unless the agency head certifies in writing to the Archivist that the records are needed to conduct the regular current business of the agency.

NGA Records Program Objectives and Staffing
This inspection does not cover NGA's records management program in general. However, it is useful to present an overview of the program to provide context for this report.

In accordance with 44 U.S.C. 3102, and Department of Defense Directive (DoDD) 5015.2, the Director of NGA shall develop, establish and maintain an active and continuing records management program. NGA Instruction for Records and Information Life-Cycle Management (NI 8040.IR10) assigns responsibilities and establishes procedures governing control, filing, destruction, and archiving (that is, life-cycle management) of NGA records in any media. NI 8040.IR10 defines 14 broad categories of records in the NGA records schedule.

According to NI 8040.IR10, the Agency Records Officer 1) establishes NGA information life-cycle management policies and procedures; 2) advises and supports the Director of the Enterprise Operations Directorate; 3) defines records management requirements and develops a program to ensure the requirements are properly satisfied; 4) advises on the NGA Automatic Declassification Review Program; and 5) develops and maintains standards, procedures, and guidelines for implementing the information life-cycle management program.

Prior to 2010 (see below), all records management responsibilities were delegated to the Mission Management Division, Records Services (EGMR) and based out of NGA headquarters in the Washington, DC, area. EGMR was staffed with twelve Full Time Equivalent (FTEs), consisting of eight government employees and four contractors, responsible for carrying out records management responsibilities agency-wide. EGMR was also responsible for the operation of two small records storage areas.

NGA serves as the functional manager of the National System for Geospatial Intelligence (NSG). The NSG is a "unified community of geospatial intelligence (GEOINT) experts, producers, and users organized around the goal of integrating technology, policies, capabilities, and doctrine to produce GEOINT in a multi-intelligence environment." In 2009, the Office of the Chief Information Officer, Strategic Planning and Policy (OCIO/CP) began working with

members of the NSG on the development of a consolidated Policy Memorandum (data retention policy) for the management of GEOINT.

NARA was notified August 20, 2010, that records management responsibilities within NGA were being split between the OCIO/CP and EGMR. EGMR retained responsibility for day-to-day operations (records transfers and accessions) as well as declassification review. OCIO/CP gained the Agency Records Officer designation, signature authorities, the Standard Form (SF) 115, and ownership of the NGA Instruction (NI) 8040.1 (records policy). At the time of the inspection, the OCIO/CP was staffed with one government FTE, while EGMR was staffed with nine FTEs, consisting of five government employees and four contractors. To support records schedule implementation, EGMR is currently establishing a network of Information Officers (IOs) throughout the agency. Primary Information Officers (PIOs) will act as liaisons between EGMR and the IOs. IOs will guide the necessary records management activities for their organization. Both PIOs and IOs will be formally trained by EGMR and file plans will be developed for all organizations.

III.   Production of Maps and Charts

Organizational Context

NGA's predecessor, the National Imagery and Mapping Agency (NIMA), was established by the National Imagery and Mapping Act of 1996. NIMA combined the Defense Mapping Agency (DMA), the Central Imagery Office (CIO), and the Defense Dissemination Program Office (DDPO) in their entirety. It also assumed the mission and functions of the Central Intelligence Agency's National Photographic Interpretation Center (NPIC), and the imagery exploitation, dissemination, and processing elements of the Defense Intelligence Agency (DIA), the National Reconnaissance Office (NRO), and the Defense Airborne Reconnaissance Office (DARO). In 2003, NIMA was reorganized and renamed as the National Geospatial-Intelligence Agency.

The creation of NGA in 2003 signified a new emphasis on the integration of geospatial intelligence sources, including image, geospatial, human, signals, electronic, and open sources to address defense and policymakers' needs with new approaches and products. In addition to traditional topographic maps, NGA also produces products that utilize a variety of sources, such as Image City Maps (ICMs), which combine imagery overlaid with topographic maps and use intelligence sources to identify key buildings, streets, military installations, hospitals, embassies, and other locations. After the events of September 11, 2001, NGA also began to provide support for security at national and international events like the Winter Olympics in Salt Lake City (2002) and Turin (2006). NGA also supplies various map products and other support during national disasters such as Hurricane Katrina.

Two major NGA directorates (Source and Production – see below) develop the maps and charts that are the subject of this inspection, and one directorate (Enterprise) includes offices that support the dissemination and storage of the source data and resulting products. The inspection covered records and recordkeeping practices of the Source and Production directorates and of several Enterprise directorate offices that support map products. The functions of these three directorates are as follows:

- ▪ **Source Operations and Management Directorate (S, Source, S Directorate).** The Source Directorate discovers, acquires, produces, delivers and manages the data and information used to produce geospatial intelligence, including maps and charts. This directorate identifies existing source material in NGA's holdings or material accessible from other U.S. government entities, commercial vendors, and foreign partners. This directorate evaluates, stores, and disseminates this data. Source also designs collection strategies to acquire new data and imagery using satellites, airplanes, and other sensors. While the S Directorate is heavily focused on collecting sources, they also develop products, such as topographic and other maps covered under this inspection. To accomplish their mission, Source is divided into a large number of groups, divisions, offices, and other units, primarily in the Washington, D.C., area and St. Louis, MO, with additional U.S. and overseas locations. The inspection team visited ten S Directorate offices at NGA East (Bethesda, MD) and NGA West (St. Louis, MO), which are listed in Appendix B.

- **Analysis & Production Directorate (P, Production, P Directorate).** The Production Directorate develops geospatial intelligence and services and provides them to policy makers, military decision makers, and the warfighter. P Directorate also provides tailored support to civilian federal agencies and international organizations. The geospatial intelligence provided by the P Directorate is derived from many sources, including the Source Directorate. P Directorate offices develop a multitude of traditional cartographic products, including hard copy ones, such as aeronautical and maritime navigation charts and aids, which are covered under this inspection. Analysis and Production also develops more innovative products, such as interactive map products, which will be covered under the second phase of this inspection. In addition, the Production Directorate generates intelligence products not covered by this report. Like Source, Production has a number of offices at NGA East and West. The inspection team visited eight Production offices, listed in Appendix B.

- **Enterprise Operations Directorate (E, Enterprise, Enterprise Directorate).** The Enterprise Directorate is responsible for day-to-day systems operations and leveraging technology to ensure and protect NGA's mission by providing enterprise, corporate, dissemination and information services. The Enterprise Directorate's mission is to provide agile IT infrastructure and services to NGA and its partners to enable access, collaboration and exploitation of GEOINT. The Enterprise Directorate is also responsible for records management implementation and operates various storage facilities, including Gila Bend, AZ. Enterprise operates a media services branch in Arnold, MO, which handles the final production processes, including assembling, editing, and reviewing proofs of products prior to printing or digital dissemination. During the inspection, staff from the Enterprise Directorate, as well as from the Office of the Chief Information Officer, provided support and served as liaisons between NARA and the Source and Production Directorates. The NARA team visited two Enterprise offices, one in Arnold, MO, and the other in Gila Bend, AZ.

Process Overview
The process of making a map, chart, or other geospatial intelligence product begins with the identification of requirements. Requirements come to NGA from policymakers, the Department of Defense (including the Combatant Commands and military services), the Intelligence Community, and other Federal agencies. Production management offices prioritize requirements, with priority given to requests on behalf of deployed troops. Depending upon the product, a feasibility study may be conducted to determine if the product already exists or can be made within the requested timeframe. When a product is tasked, existing products and data sources are assessed for use in developing the new product, including imagery, as well as non-imagery data such as projections, grids, geographic names and boundary information, elevations, and other geospatial data. Determinations are made regarding who will develop the product, such as NGA in-house, a commercial vendor, or a foreign government "co-producer."

As part of the production process, data is extracted and stored in the Geospatial Intelligence Feature Database (GIFD) for future production uses. Some data and soft copy products may be sent directly to the customer. Other, more widely distributed products are sent to NGA's Arnold facility for final finishing, printing, or digital replication. Either before or during the finishing

process, depending upon the product, maps and charts are evaluated for accuracy, such as verifying vertical and horizontal accuracy, or utilizing control sources to compare map features against a standard. Once the finishing process is complete, products are sent to the Defense Logistics Agency (DLA), where they undergo inventory management and are distributed to customers through a subscription service.

Products
NGA creates a variety of both published and non-standard maps and charts. Published products (Series 801-10 in the NGA records control schedule), also called standard products, are those that are widely available to other Federal entities through the subscription service operated by the DLA. Published products fall into several broad categories, including topographic products, aerospace products, hydrographic products, targeting and navigation products, and special products. Published products are available in either hard copy or electronic form or both, depending upon the product. Some specific types of products available in hard copy include Topographic Line Maps (TLMs), Image City Maps (ICMs), City Graphics (CGs), and Country and Urban Atlases. Aeronautical and hydrographic products available in hard copy include Standard Nautical Charts, Littoral Planning/Combat Charts (LPCs), Flight Information Publications (FLIPs), Global Navigation Charts, Harbor and Approach Charts, Pilot Charts, and Coastal Charts. Many of these products are used by not only the Department of Defense and other government agencies, but also by civil aviators, mariners, and foreign governments.

In addition to standard or published maps and charts, NGA also creates non-standard or special, one-time products (Series 801-11) created in response to a specific request from a policymaker, the Department of Defense, or another Federal agency. For example, a customized, digital map of an area under combat may be sent directly to a unit in the field. During natural or other disasters such as the British Petroleum/Deepwater Horizon oil spill in the Gulf of Mexico, NGA, with permission from Congress to assist domestically, creates imagery-based and other geospatial products that assist in monitoring, cleanup, rescue, and other efforts. While non-standard products are not available through the subscription service, they may be available more widely through other dissemination means, primarily via postings on Intelink, the Intelligence Community's intranet. Non-standard products include some of the same product types as published products. Most non-standard products are available exclusively in electronic format, although there are a few limited ones produced in hard copy. Non-standard hard copy products include bound map compilations for special events such as the Olympics and tactical maps of urban areas in combat zones. Generally, these non-standard hard copy products are produced in very limited numbers.

Mapping products, particularly standard, published ones, traditionally have a map history case file or a project history file (Series 801-08) associated with them. This file may include records that support the project, including reports, related publications, notes, product specifications, lists of sources utilized to produce the product, and other documents.

Transfer of the record copy of these products and their related history files to the National Archives is required by the NGA records control schedule. Compliance with this requirement is discussed in the findings and recommendations section of this report (Section IV).

Access Restrictions
A limited number of NGA products are classified, generally at the Secret level. Existing procedures and practices are in place to handle security classified records both at NGA and at NARA. However, a significant number of NGA products are marked "Limited Distribution (LIMDIS)." LIMDIS is not a classification marking, but is instead a control marking that limits the release or disclosure of unclassified LIMDIS products and data to established Department of Defense and certain other Federal customers, and to their contractors that require access for contract performance. NGA is further authorized through a delegation of authority from the Secretary of Defense to grant release of LIMDIS products to other entities, such as other Federal agencies, U.S. allies, or other foreign governments. All others, including the public, are prohibited from viewing LIMDIS products. While not classified, these products are considered sensitive. The LIMDIS restriction most often is derived from bi-lateral agreements with foreign nations, but may also be required due to copyright restrictions, operational security needs, or for the protection of sources and methods. Since the Department of Defense prohibits public access to LIMDIS products, NARA cannot provide researcher access to many NGA products in NARA's holdings of accessioned records unless the restrictions are lifted. NARA is already working with NGA to provide researcher access to these products where permissible. However, the Findings and Recommendations section of this report (Section IV) contains an action item to further address access to LIMDIS-marked products.

IV.   Findings and Recommendations

General Records Management
Findings:

As part of the inspection, NARA queried S and P Directorate offices about their records management processes. Most offices lack clearly defined processes for completing basic records management actions such as identifying and submitting schedules for unscheduled records, retiring inactive records to a records storage facility, and destroying temporary records eligible for destruction.

One factor that contributes to the lack of clearly defined records management processes in the S and P Directorate offices is that these offices in the past did not have designated records liaisons. This problem existed despite the fact that NI 8040.IR10 requires that the "Directorate and Office Directors implement the procedures for records management program within their jurisdictions. Each office of record appoints a records liaison." The records liaison is a member of the program staff that is responsible for overseeing records management responsibilities in the program office in cooperation with the agency records officer. It should be noted that many offices have been able to complete some records management processes within the bounds of the law (such as destroying some temporary records appropriately), but they have not been able to do so knowledgeably or with adequate support from the overall records management program. For example, during inspection site visits NGA staff noted that they "did not know who the agency records officer is" and it was also conveyed to the NARA inspection team on a number of occasions, both verbally and during formal presentations, that "records management processes have not been in place since the transition from NIMA to NGA."

It also appeared that some units may have unscheduled records, such as the Mission Integration Division's (SLM East) correspondence with foreign governments and entities; Coordinate System Analysis' (SNAC) Geodetic Packages, Country Files, Commodity Data Evaluations, and Accuracy Assessments; and Maritime Services' (PVM) Foreign Notice to Mariners (as opposed to NGA-produced U.S. Notice to Mariners). Also, NARA believes that the lack of records management processes at lower-level offices has greatly contributed to the failure of NGA to transfer permanent hard copy maps and charts to the National Archives.

Another element that contributed to inadequate records management processes is the low visibility of the agency records management program. As described above, NGA program offices do not have awareness of agency records management procedures or policies, including knowledge of the agency retention schedules and agency records officer. In addition, NGA received a score of 42 out of 100 (2009) and 60 out of 100 (2010) in the annual records management self-assessment of agencies.[2] These scores indicate there was a high level of risk

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[2] "2009 Records Management Self-Assessment: An Assessment of Records Management Programs in the Federal Government," Appendix I, page 6 of 25.   "2010 Records Management Self-Assessment Report: An Assessment of Records Management Programs in the Federal Government," Appendix I, page I-3. Both reports are available at http://www.archives.gov/records-mgmt/resources/self-assessment.html.

associated with the NGA records management program in 2009 followed by a moderate level of risk in 2010.

The notable exception to the overall lack of defined records management processes in the S and P Directorates is the Office of Global Navigation (PV). PV is an ISO 9001 registered organization, which means it is an ISO Quality Management System that emphasizes customer satisfaction, continuous improvement, consistent performance, defined procedures, and auditable processes. Among other matters, the control of records and documents is part of the ISO 9001 semi-annual audit process.

One office that stood out during the inspection is the Office of Aeronautical Services (PVA). As part of their ISO 9001:2008 registered Quality Management System program, PVA has well-established processes for compliance with records management procedures, which are embedded in their overall procedures. An example of useful procedural guidance is PVA FLIP & DAFIF DVDs Archive Work Instruction DIS-65887-1. This Instruction outlines the requirements and procedures used by PVA to regularly retire its permanent records to inactive storage (semi-annually) and eventual transfer to the National Archives. While there may not be sufficient compelling business need for other units to participate in the ISO 9001 program, other units within the S and P Directorates may benefit from reviewing PVA's records management procedures.

As part of a larger effort to strengthen the overall records and information management program, NGA has recently begun to appoint a network of Information Officers (IOs) throughout the agency, including the S and P Directorates, who will perform key records and information management functions. The IOs have the same function as records liaisons, so that their appointment in the S and P Directorates in particular addresses the deficiency discussed above.

The PIOs are a critical link between program offices and the Enterprise Directorate records and information management staff. Throughout the Federal government, typical duties for this position include coordinating changes to the records schedule; ensuring that component recordkeeping procedures are established, implemented, and periodically updated for records in all media, including electronic and other special media; ensuring that all the records of each office are listed in the office file plan; facilitating the transfer of eligible records to a records center; ensuring the prompt disposal of temporary records when their retention periods expire; and overseeing the timely transfer of permanent records to NARA.

The appointment and training of the PIOs is a major effort, which was well underway at the time of the inspection. The imperative to have PIOs will become even more apparent during the second phase of this inspection covering digital mapping products, given the increased complexity of managing soft copy (digital) records. To continue to focus the limited resources, these recommendations are aimed at the S and P Directorates. Resolving these problems at this level will have the greatest impact. Therefore, NGA (through EGMR) should:

Recommendations:

1. Continue to appoint and train the network of PIOs for all offices within the S and P Directorates.

2. Work with all S and P Directorate offices to inventory records and develop file plans based on the results. These file plans will formalize many disposition actions that are already properly taking place, provide a chance to clarify what disposition items are being used for what records, and identify any unscheduled records. The file plans should cover paper and electronic records, including shared drives and databases.

3. Develop written procedures documenting the process flow for the retirement of inactive records to off-site storage and the transfer of permanent records to NARA. This will help address this deficiency by the S and P Directorates as required by NI 8040.IR10.

Transfer of Overdue Legacy Holdings

Findings:

Geospatial Publication Record Set

The NGA schedule (Series 801-10) mandates the transfer of a record copy of each edition of each printed map or chart to the National Archives upon publication. However, NARA has not received regular transfers of maps and charts since NGA's predecessor NIMA was stood up in 1996. On a more positive note, NARA has been receiving aeronautical publications, generally from Aeronautical Services (PVA) or its predecessor office. These aeronautical publications include a January 2011 transfer that contains military versions of standard aeronautical publications and charts ranging in date from the mid 1940s through 1990. However, aeronautical publications in general represent a small subset of all the NGA maps and charts.

In the past, NARA has been unsuccessful in systematically addressing the lack of regular transfers of map products. NARA therefore turned to obtaining items from the Defense Logistic Agency's (DLA) subscription service, beginning in 1998 when NGA (then the National Imagery and Mapping Agency or NIMA) turned over storage and distribution of its products to DLA. For a number of years NARA has obtained selected hard copy maps and other products from DLA. Nevertheless, these products do not include classified maps and are not accompanied by the Standard Form (SF) 258, Agreement to Transfer Records to the National Archives of the United States, which gives NARA legal custody of the records. The subscription service also does not handle one-time or special products.

The transfer of products to NARA further declined when the GEOINT Research Center (SR or Library) stopped retiring products to NARA Federal Records Centers (FRCs). (For more information on the GEOINT Research Center, see "Rare Map Collection" – Recommendation 15 below.) According to SR staff in St. Louis, up until 1996, the library was retiring the master (gold) copy of a map to NARA's St. Louis FRC storage for eventual transfer to NARA archival custody. In 1996, this process ceased when the Records Management Office and the unit responsible for the Library agreed that the producing units should take responsibility for the transfer of records to NARA as the office of primary record and since they had the related source and history files. However, it appears that this process was not communicated to the

producing units, and they never implemented it. Meanwhile, the Library continued to send what they viewed as non-record reference copies to the Library of Congress (LC) whenever a map was superseded by a new edition. NGA has sent these outdated copies to LC to ensure broader access to their products. The NGA Library has decided to maintain all previous editions of their stock in order to maintain the historical records needed by the Intelligence Community (IC) and the National System for Geospatial-Intelligence (NSG).

The Library has also been scanning all of its hard copy holdings and is slightly more than half way complete. This topic will be covered by the second part of NARA's inspection, which will focus on NGA's management of electronic maps and charts.

To address the lack of up-to-date transfers, NGA should:

Recommendations:
4. Sign a NARA-prepared SF-258 covering all hard copy geospatial publications already in NARA's physical custody that were obtained from the DLA subscription service.

5. Submit for NARA review a written analysis of options for locating and transferring hard copy geospatial publications covered by Series 801-10 that are overdue. Upon receipt of the analysis, NARA will provide additional information based on a review of the NGA holdings at the Library of Congress.

6. Issue a formal tasking within NGA to locate any extant non-standard, one-time, hard copy special products covered by Series 801-11 for retirement to inactive storage and eventual transfer to NARA. Provide NARA a copy of the tasking and a statement regarding the results.

Map History Files
Mapping products are typically created with a related map history case file or a project history file associated with them. The NGA Records Schedule includes an item for Geospatial Project History Files (Series 801-08), which states that this item covers: "Project history data which can define and delimit areas charted, contents of charts, and delimit areas. May also include methods used, reports, specific references, and other data basic to the content (currency), accuracy, and reliability of charts, maps, and publications." According to the schedule, this item is a permanent record that should be transferred to NARA twenty-five years after termination of the project or when no longer needed. The NGA schedule also contains numerous temporary items pertaining to the development of maps and charts, such as Quality Surveillance Files (Series 801-07), Geospatial Indexes (Series 801-09), Map and Chart Corrections (Series 802-03), and others.

During the inspection it was not clear whether offices have been maintaining Project History Files appropriately. In particular, it could not be determined what should be placed in a Project History File versus what is covered under some of the above-mentioned temporary items, whether History Files routinely have been created and then inappropriately destroyed, and if any exist for legacy hard copy products or if they are being created for hard copy products being produced now. During the inspection the team did not view any Project History Files.

To clarify the status of Project History Case Files NGA should:

Recommendations:

7. Determine if Project History Files were created in the past and were inadvertently destroyed. If they were destroyed, provide a report to NARA as required by the Code of Federal Regulations (36 CFR 1230.14). (Details on this requirement can be found below under "Flood of 1993" – Recommendation 18 below.)

8. Determine if current procedures need to be updated to govern the creation, maintenance, and disposition of Project History Files for hard copy products. NGA should then update the procedures if necessary. (Note: this issue will also be examined during the second phase of the NGA inspection covering digital mapping products.)

NGA Gila Bend (Media Services Branch, EGMM)
NGA operates a storage facility at Gila Bend Air Force Auxiliary Air Field in Gila Bend, AZ. The facility stores some temporary records that are not the subject of this inspection. In addition to these records, Gila Bend holds several thousand square feet of topographic, hydrographic and nautical reproduction materials, including 90,000 sets of multiple layers of oversized film negatives (known as "repromats") that are used to produce finished map products. These reproduction materials represent the last best available edition of any map originally produced with a film negative. These reproduction materials are being scanned on demand with others scanned on a triage basis. NGA's goal is to eventually scan all of the "repromats" held at Gila Bend. The digital images of the film-based reproduction materials are then finished at the NGA Arnold, MO facility and stored at another off-site location. (These digital image files will be covered under the second phase of this inspection.) The Gila Bend facility also has about 90 boxes of permanent hard copy aeronautical products from PVA that need to be reviewed for transfer to NARA.

To address disposition issues at the Gila Bend facility, NGA should:

Recommendations:

9. Identify the file series of the reproduction materials and communicate the findings to NARA. If NGA determines that they fall under an existing permanent file series, NGA must submit a new Standard Form 115, Request for Records Disposition Authority, to NARA requesting a change to temporary retention for the reproduction materials. (Given the technical requirements and expertise needed to use these materials, it is not practical for NARA to accession the reproduction materials for researcher use, nor does NGA have ongoing use for them once they are digitized.)

10. Review the disposition status of the 90 boxes of PVA aeronautical products at the Gila Bend facility and, if appropriate, transfer them to the National Archives.

NARA also encourages NGA to continue scanning the reproduction negatives since these images form the basis of a valuable digital collection that will be eligible for transfer to NARA and available to future researchers at the appropriate time. Depending upon the product and the

date it was produced, the image files may also serve (as digital surrogates) to fill some of the gaps in NARA's collection of legacy hard copy maps.

Ongoing Transfer of Hard Copy Maps and Charts
Findings:

NARA has the ability to request all hard copy NGA products (covered by Series 801-10) from the DLA subscription catalog; however, using the DLA subscription service is not the most efficient and effective way for NARA to obtain a record copy of each NGA map and chart. Also, per DLA's usual procedure, most maps arrive folded, which presents long-term preservation concerns, and no instructions are provided to NARA regarding access restrictions. Moreover, these map products are not accompanied by the SF-258, Agreement to Transfer Records to the National Archives of the United States, which gives NARA legal custody of the records and requires agencies to specify access restrictions.

Some NGA units produce a small amount of non-standard hard copy products (covered by Series 801-11) that are not available through the DLA subscription service. For example, the Office of the Americas North American and Homeland Security Division (PMH) Domestic Operation Branches East (PMHR) and Domestic Operations Branch West (PMHI) produce special event books and disaster response map atlases. Also, Media Services at NGA's Arnold facility (EGMM) print limited runs of such items as tactical maps used in combat areas. These maps are printed and delivered straight from NGA's Arnold facility to such customers as the Department of State. It was unclear during the inspection if these non-standard products are considered special geospatial products or are intelligence products governed under a different disposition authority (Series 703-07, designated as permanent) and not covered as part of this report, which does not address intelligence products.

To facilitate the transfer of permanent records as required by the agency's records schedule and under 36 CFR 1235.10, NGA should:

Recommendations:
11. Coordinate with NARA and DLA to develop a memorandum of understanding or other appropriate mechanism to ensure that DLA from day forward sends one copy, flat (not folded), of every hard copy map and chart directly to NARA's custodial unit for cartographic holdings.

12. Coordinate with NARA's Special Media Archival Services Division to establish written procedures for periodically (quarterly or yearly) generating SF 258s to effect the legal transfer of the products transferred.

13. Determine if NGA or DLA could also on the same timetable as the SF 258 provide an electronic list of all products transferred during the time period covered by the SF 258.

14. Determine if the special products such as the event books are non-standard products covered under the 800 Geospatial Series or are intelligence products. In either case,

NGA needs to establish procedures for identifying and retiring these products for eventual transfer to NARA.

Rare Map Collection – GEOINT Research Center (SR) -East
Findings:

NGA operates the two GEOINT Research Centers (SR East in Bethesda, MD, and SR West in St. Louis, MO), also known as "libraries." The research centers provide research services and access to open source information and geospatial intelligence material to both NGA and external customers. SR also holds one or more copies of the most current edition of each NGA published map. (One-time, special products generally are not sent to the libraries.) The libraries' collections include hard copy maps, born-digital maps, and scanned copies of maps stored in the Integrated Library System, also known as Voyager. (The digital holdings in Voyager will be covered under the upcoming inspection devoted to digital map products.)

According to NGA staff, the GEOINT Research Center in Bethesda holds, in addition to the expected NGA-produced products, a "rare map collection," which includes such items as a "Colin Powell briefing map," a "1913 German map of the West Coast of Africa," "1850s Whale Charts," "captured Nazi maps," and other items. The NARA team did not view these items during the inspection. Their existence was merely mentioned at the end of the visit to SR, and the inspection visit schedule did not allow time for adequate review. It is not clear if these items are Federal records that would fall under the purview of the Federal Records Act. To determine record status and ensure proper storage conditions, NGA should:

Recommendations:
15. Arrange for the NARA inspection team, accompanied by subject area experts from NARA's cartographic unit, to examine more closely these holdings, work with NGA to determine record status, and take appropriate disposition actions, if warranted.

Access Issues
Findings:

As discussed on page 10 in Section III above, many NGA products are stamped with a Limited Distribution (LIMDIS) control marking, which limits access to the product to the Department of Defense and their contractors and others designated by NGA. The general public is prohibited from viewing LIMDIS products, which means that NARA cannot serve many NGA products to its researchers. Keeping track of LIMDIS requirements and making release determinations is the responsibility of NGA's Office of International Affairs and Policy (OIP) in conjunction with NGA's General Counsel. NARA has been working constructively with the Disclosure and Release Division of OIP (OIPD) to lift restrictions where possible. For example, in 2008 OIP issued a memorandum removing restrictions from certain categories of large-scale geospatial products. NARA is able to use such guidance to provide access to otherwise restricted products. NARA also communicates with OIPD regarding individual access requests to specific products.

To further these existing efforts to lift access restrictions where feasible, NGA should undertake the following actions:

Recommendations:

16. Determine if the LIMDIS restrictions can be lifted on a broad range of older products in addition to those covered by the 2008 guidance for large-scale geospatial products and provide a list of releasable products to NARA.

17. Establish clear, written procedures for NARA to interact with the NGA release office when NARA has requests for LIMDIS products. Include expected time frames for NGA to respond to NARA requests for review.

<u>Flood of 1993</u>
Findings:

During the inspection visits at NGA West in St. Louis, NGA personnel explained that many records that should have been transferred to the National Archives may have been lost during a large-scale flood of the St. Louis area in 1993, which devastated one of their major facilities. According to a 1996 Department of Defense Office of the Inspector General's audit report of reconstruction plans following the flood: "In July 1993, the South Broadway Complex [of the Defense Mapping Agency] was inundated with flood waters and suffered extensive damage." At the time, the South Broadway Complex included the printing and storage facilities for the Defense Mapping Agency (DMA), which was the predecessor agency to the National Imagery and Mapping Agency (NIMA), which was the predecessor to NGA.

NGA personnel during the inspection stated that "many valuable, one-of-a-kind" maps were in the South Broadway building at the time of the flood, including captured German (Nazi) records, Civil War maps and other maps dating back to the nineteenth century, and a variety of DMA-produced products, the record copy of which may not have ever been transferred to NARA.

At the time of the flood, 44 U.S.C. 3106 required that "The head of each Federal agency shall notify the Archivist [of the United States] of any actual, impending, or threatened unlawful removal, defacing, alternation, or destruction of records in the custody of the agency of which he is the head that shall come to his attention…." After the inspection, NARA searched its files from that time period and it appears that NARA did not receive a report regarding records lost during the flood. While a considerable amount of time has passed since this flood, NARA routinely requires that agencies provide reports on past unauthorized destruction or alienation of Federal records. Based on the requirements under U.S. Code in force at the time of the flood and current practice of requiring reports on past unreported destructions, NGA should take the following actions:

Recommendations:

18. As required under 36 CFR 1230.14, provide NARA with a report describing what records may have been lost during the 1993 flood. According to this section of the CFR, the report must include:
    (1) A complete description of the records with volume and dates if known;
    (2) The office maintaining the records;

(3) A statement of the exact circumstances surrounding the removal, defacing, alteration, or destruction of records;

(4) A statement of the safeguards established to prevent further loss of documentation; and

(5) When appropriate, details of the actions taken to salvage, retrieve, or reconstruct the records.

In addition, the report must be submitted or approved by the individual authorized to sign records schedules as described in 36 CFR 1220.34(b).

19. Include in records management training and in the NGA Records Management Policy (NI 8040.IR10) information covered by requirement 5.3.8.4 in DoD Directive 5015.2 regarding notification of unauthorized disposition of Federal records. This requirement is: "The head of each DoD component shall … Advise all employees at least annually … How to inform appropriate officials of any actual, impending, or threatened unlawful removal, alteration, or destruction of Federal records."

Appendix A: Recommendations (Consolidated List)

1. Continue to appoint and train the network of PIOs for all offices within the S and P Directorates.

2. Work with all S and P Directorate offices to inventory records and develop file plans based on the results. These file plans will formalize many disposition actions that are already properly taking place, provide a chance to clarify what disposition items are being used for what records, and identify any unscheduled records. The file plans should cover paper and electronic records, including shared drives and databases.

3. Develop written procedures documenting the process flow for the retirement of inactive records to off-site storage and the transfer of permanent records to NARA. This will help address this deficiency by the S and P Directorates as required by NI 8040.IR10.

4. Sign a NARA-prepared SF-258 covering all hard copy geospatial publications already in NARA's physical custody that were obtained from the DLA subscription service.

5. Submit for NARA review a written analysis of options for locating and transferring hard copy geospatial publications covered by Series 801-10 that are overdue. Upon receipt of the analysis, NARA will provide additional information based on a review of the NGA holdings at the Library of Congress.

6. Issue a formal tasking within NGA to locate any extant non-standard, one-time, hard copy special products covered by Series 801-11 for retirement to inactive storage and eventual transfer to NARA. Provide NARA a copy of the tasking and a statement regarding the results.

7. Determine if Project History Files were created in the past and were inadvertently destroyed. If they were destroyed, provide a report to NARA as required by the Code of Federal Regulations (36 CFR 1230.14). (Details on this requirement can be found below under "Flood of 1993" – Recommendation 18 below.)

8. Determine if current procedures need to be updated to govern the creation, maintenance, and disposition of Project History Files for hard copy products. NGA should then update the procedures if necessary. (Note: this issue will also be examined during the second phase of the NGA inspection covering digital mapping products.)

9. Identify the file series of the reproduction materials and communicate the findings to NARA. If NGA determines that they fall under an existing permanent file series, NGA must submit a new Standard Form 115, Request for Records Disposition Authority, to NARA requesting a change to temporary retention for the reproduction materials. (Given the technical requirements and expertise needed to use these materials, it is not practical for NARA to accession the reproduction materials for researcher use, nor does NGA have ongoing use for them once they are digitized.)
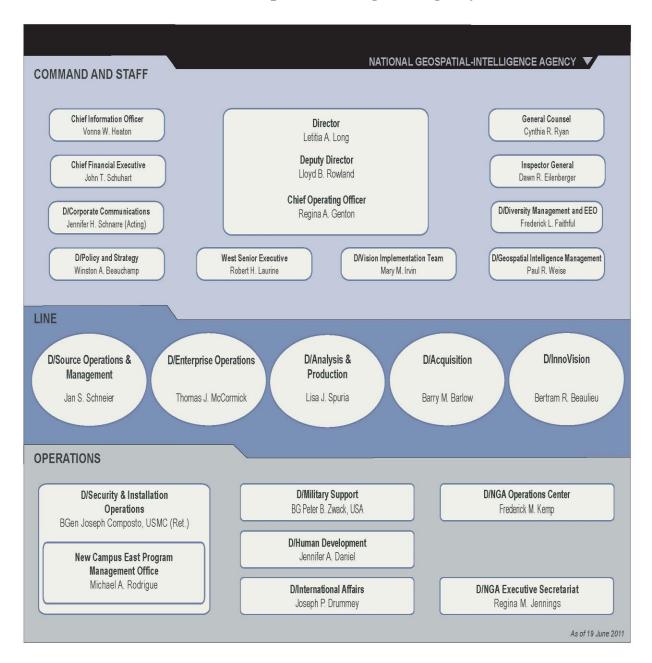
10. Review the disposition status of the 90 boxes of PVA aeronautical products at the Gila Bend facility and, if appropriate, transfer them to the National Archives.

11. Coordinate with NARA and DLA to develop a memorandum of understanding or other appropriate mechanism to ensure that DLA from day forward sends one copy, flat (not folded), of every hard copy map and chart directly to NARA's custodial unit for cartographic holdings.

12. Coordinate with NARA's Special Media Archival Services Division to establish written procedures for periodically (quarterly or yearly) generating SF 258s to effect the legal transfer of the products transferred.

13. Determine if NGA or DLA could also on the same timetable as the SF 258 provide an electronic list of all products transferred during the time period covered by the SF 258.

14. Determine if the special products such as the event books are non-standard products covered under the 800 Geospatial Series or are intelligence products. In either case, NGA needs to establish procedures for identifying and retiring these products for eventual transfer to NARA.

15. Arrange for the NARA inspection team, accompanied by subject area experts from NARA's cartographic unit, to examine more closely these holdings, work with NGA to determine record status, and take appropriate disposition actions, if warranted.

16. Determine if the LIMDIS restrictions can be lifted on a broad range of older products in addition to those covered by the 2008 guidance for large-scale geospatial products and provide a list of releasable products to NARA.

17. Establish clear, written procedures for NARA to interact with the NGA release office when NARA has requests for LIMDIS products. Include expected time frames for NGA to respond to NARA requests for review.

18. As required under 36 CFR 1230.14, provide NARA with a report describing what records may have been lost during the 1993 flood. According to this section of the CFR, the report must include:
    (1) A complete description of the records with volume and dates if known;
    (2) The office maintaining the records;
    (3) A statement of the exact circumstances surrounding the removal, defacing, alteration, or destruction of records;
    (4) A statement of the safeguards established to prevent further loss of documentation; and
    (5) When appropriate, details of the actions taken to salvage, retrieve, or reconstruct the records.
    In addition, the report must be submitted or approved by the individual authorized to sign records schedules as described in 36 CFR 1220.34(b).

19. Include in records management training and in the NGA Records Management Directive (NI 8040.IR10) information covered by requirement 5.3.8.4 in DoD Directive 5015.2 regarding notification of unauthorized disposition of Federal records. This requirement is: "The head of each DoD component shall … Advise all employees at least annually … How to inform appropriate officials of any actual, impending, or threatened unlawful removal, alteration, or destruction of Federal records."

Appendix B: Organization Chart

National Geospatial-Intelligence Agency

COMMAND AND STAFF

NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY ▼

Chief Information Officer
Vonna W. Heaton

Chief Financial Executive
John T. Schuhart

D/Corporate Communications
Jennifer H. Schnarre (Acting)

D/Policy and Strategy
Winston A. Beauchamp

Director
Letitia A. Long

Deputy Director
Lloyd B. Rowland

Chief Operating Officer
Regina A. Genton

West Senior Executive
Robert H. Laurine

D/Vision Implementation Team
Mary M. Irvin

General Counsel
Cynthia R. Ryan

Inspector General
Dawn R. Eilenberger

D/Diversity Management and EEO
Frederick L. Faithful

D/Geospatial Intelligence Management
Paul R. Weise

LINE

D/Source Operations & Management
Jan S. Schneier

D/Enterprise Operations
Thomas J. McCormick

D/Analysis & Production
Lisa J. Spuria

D/Acquisition
Barry M. Barlow

D/InnoVision
Bertram R. Beaulieu

OPERATIONS

D/Security & Installation Operations
BGen Joseph Composto, USMC (Ret.)

New Campus East Program Management Office
Michael A. Rodrigue

D/Military Support
BG Peter B. Zwack, USA

D/Human Development
Jennifer A. Daniel

D/International Affairs
Joseph P. Drummey

D/NGA Operations Center
Frederick M. Kemp

D/NGA Executive Secretariat
Regina M. Jennings

As of 19 June 2011

3. - https://www1.nga.mil/About/WhoWeAre/HowWeAreOrganized/Documents/org.pdf

Appendix C: Offices Visited During Inspection

Source Operations and Management Directorate:

EAST (Bethesda, MD)
Source Operations and Management Directorate (S) – briefing only
Source Integration (SL) – briefing only
Mission Integration Division (SLM)
GEOINT Research Center (SR)
Coordinate Systems Analysis Branch (SNAC)
GEOINT Foundation Office (SG)
Geospatial Assessments (SGA)

WEST (St. Louis, MO)
Source Operations and Management Directorate (S) – briefing only
GEOINT Sciences (SN)
Commercial Operations and Architecture (SCW)
Geoint Foundation Office (SG)
GEOINT Research (SR)
Coordinate Systems Analysis Branch (SNAC)

Analysis and Production Directorate:

EAST (Bethesda, MD)
Analysis and Production Directorate (P) – briefing only
Office of Global Navigation (PV) – briefing only
Maritime Services (PVM)
North America and Homeland Security Division (PMH)
Latin America Division (PML) - briefing only
Central and Southwest Asia (PS) - briefing only
Office of Targeting and Transnational Issues (PR) - briefing only

WEST (St. Louis, MO)
Office of Global Navigation (PV) – briefing only
Aeronautical Services (PVA)
Maritime Domain HC Charts (PVY)
Office of the Americas (PM)
North American and Homeland Security Division (PMH)
Latin America Division (PML)
US Border Security Division (PMX)

Enterprise Operations Directorate:

EAST (Bethesda, MD)
Records Services (EGMR) – briefing only

WEST (Arnold, MO, and Gila Bend, AZ)
      Media Services (EGMM) – Arnold, MO
      Media Services (EGMM) – Gila Bend, AZ

Appendix D: Review and Follow up

Authorities

44 U.S.C. Chapter 29
36 CFR Chapter XII, Subchapter B
Part 1239, Program Assistance and Inspections

Follow Up Steps

Action Plan

NGA will submit to the Archivist of the United States an action plan that specifies how the agency will address each inspection report recommendation, including a timeline for completion and proposed progress reporting dates.

The plan should be submitted within 60 days after the date of transmittal of the final report to the head of the agency.

Progress Reports

NGA will submit to NARA progress reports on the implementation of the action plan until all actions are completed.

NARA Review

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