National Archives and Records Administration
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REC0RDS MANAGEMENT IN THE CENTRAL INTELLIGENCE AGENCY

A NARA EVALUATION

(U) EXECUTIVE SUMMARY

(U) This evaluation of the records management program of the Central Intelligence Agency (CIA) was performed under the authority granted to the National Archives and Records Administration (NARA) by 44 U.S.C. 2904 and 2906 "to conduct inspections or surveys of the records and records management programs and practices within and between federal agencies." The evaluation involved visits to offices at CIA Headquarters in the Washington, DC, area as well as field sites.

(U) The CIA provides overall guidance and support to intelligence gathering by the U.S. Government and is responsible for collecting, evaluating, and disseminating intelligence relating to national security. Proper records creation and maintenance and the eventual transfer to NARA of permanently valuable records are necessary to document the CIA's fulfillment of its missions.

(U) The CIA already has many elements of a good records management program: Agency regulations clearly define program objectives and responsibilities; Information Management Officers (IMOs) are assigned to establish and direct Information Management programs in each directorate and component; records management training is provided to all employees; and a program has been implemented to ensure a periodic audit of records management throughout the agency. The CIA has developed formal recordkeeping requirements and guidance. The agency's major intelligence gathering and dissemination operations appear to be documented adequately. In most of the offices visited, schedules appear to cover the textual records.

(U) The program, however, does have serious shortcomings that must be rectified to ensure the agency's compliance with federal records management laws and regulations.

(U) CIA has scheduled few of its electronic systems, although the agency maintains thousands of systems, including electronic versions of such key records as finished intelligence products and records relating to covert operations and intelligence assets.

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Without approved schedules, there is a serious risk that information of great value will not be preserved.

(U) CIA has not issued guidance and implemented measures that address the specific maintenance and preservation needs of nontextual records. This is of particular concern since the lengthy period of time CIA retains permanent nontextual records prior to transfer to NARA requires pro-active preservation measures, including, in some instances, the copying of records that were created on obsolete media. In addition, some nontextual CIA series are either unscheduled or are covered by disposition schedules that should be updated.

(U) Problems were also found with the management and disposition of textual records. Current schedules do not reflect the fact that many of the most important CIA records, which were hitherto solely in paper form, are now created and maintained electronically. Some offices use short-term chronoloalcal files for documents that should be placed in program/policy files, while in other offices, staff regard the files they accumulate as non-record "soft" files because, they believe, the information in their records is available elsewhere. Because existing schedules call for the transfer of CIA records to NARA custody when 50 years old, NARA's holdings of permanent agency records are negligible.

(U) To resolve these problems, NARA recommends that CIA:

(U) Work with NARA to ensure that all CIA electronic records are eventually covered by NARA-approved schedules, as required by federal law and regulation;

(U) Ensure the management of nontextual records by developing and implementing preservation guidance, inventorying nontextual holdings, developing schedules for unscheduled series, and accelerating the transfer of permanent records to NARA;

(U) Ensure that schedules for textual records are implemented properly, including those schedule items that cover chronological and working files; and

(U) Modify schedules to provide for the expedited transfer of permanent records to NARA and develop a timetable for the transfer of specific files.

(U) To implement the recommendations contained in this report, additional staff in the records management area is needed.

(U) INTRODUCTION

(U) The Central Intelligence Agency (CIA) was established by the National Security Act of 1947 as an independent agency within the Executive Branch. The agency is charged with coordinating the nation's intelligence activities and correlating, evaluating, and disseminating intelligence which affects national security. In addition, the CIA performs any duties relating to intelligence that the National Security Council may direct.

(U) CIA's basic organization consists of the Office of the Director of Central Intelligence (DCI) and a number of offices that report directly to the Director or the Deputy Director of

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Central Intelliaence, as well as four directorates: the Directorate of Administration (DA), the Directorate of Intelligence (DI), the Directorate of Operations (DO), and the Directorate of Science and Technology (DS&T). CIA Headquarters is located in northern Virginia. The agency also has field sites.

(U) Purpose, Origin, and Scope of the Evaluation

(U) This report evaluates the recordkeeping policies and practices of the CIA. It has been prepared by the National Archives and Records Administration (NARA) pursuant to 44 U.S.C 2906, which authorizes NARA to inspect the records management programs of federal agencies and recommend improvements.

(U) This evaluation focused on all aspects of the creation, maintenance and use, and disposition of records of the CIA. It was conducted by NARA staff members with the assistance of CIA staff, particularly Information Management Officers from CIA's Office of Information Technology, the Office of the Director of Central Intelligence, and CIA's four directorates. The NARA evaluators visited over 30 major program offices and a large number of their subordinate components and staff at CIA facilities both at Headquarters and in the field. The evaluators reviewed background materials, conducted interviews with CIA program and administrative staff, and examined records.

(U) Structure of the Report

(U) This report is divided into six chapters, each of which addresses a specific aspect of records management.

(U) Chapter I deals with overall program management. It addresses program objectives and responsibilities, organization and staffing, training, and internal evaluation of the records management program.

(U) Chapter II, on records creation and maintenance, discusses recordkeeping requirements, adequacy of documentation, files maintenance, the Agency Records Center, preservation concerns, and vital records.

(U) Chapter III pertains to records disposition, including the adequacy of current schedules and their implementation. This chapter also addresses subjects that are unique to CIA, such as the screening of operational files, the need to revise schedules so records are transferred to NARA sooner than when 50 years old, and the issue of security classified schedules.

(U) Chapter IV discusses the agency-wide electronic records management program, program guidance, electronic mail, and scheduling issues. This chapter also discusses certain major agency-wide systems that are now under development.

(U) Chapter V contains findings concerning records management at CIA field sites.

(U) Chapter VI discusses the management of CIA nontextual records, particularly preservation concerns.

(U) In addition, there are two appendices. Appendix A is a list of the recommendations made in this report. Appendix B details agency follow-up procedures to the
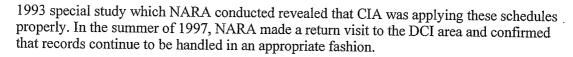
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superseded 1982 version. Similarly, input for the Agency File Guide provided by the DI cited as the disposition authority for R&D records a general schedule which NARA rescinded in 1988. CIA's recent decision to make the GRS accessible on-line within the agency is a positive step. However, CIA must ensure that if there is a need to disseminate the GRS, as opposed to incorporating it into agency schedules, the copy that is available is up-to-date.

(U) Adequacy of Current Schedules

(U) Despite their age, the CIA schedules NARA has approved over the years for textual records cover the vast majority of the paper files held by the CIA offices NARA visited. A few offices, however, accumulate textual records that do not appear to be covered by approved schedules. These unscheduled records include Crime and Narcotics Center minutes, a series to which CNC applies the disposition authority for another series (albeit one that provides for the preservation of the records), and several series of finding aids for the intelligence documents collection maintained by a branch within the DI's Office of Support Services.

(U) A serious issue pertaining to the currency of CIA schedules is the fact that, as noted above, few electronic systems accumulated in connection with CIA's basic mission are covered by NARA-approved schedules even though CIA offices increasingly create and maintain their basic records in an electronic format. In many instances, paper copies of electronically-prepared documents, such as finished intelligence products issued by the DI, are still produced and retired in accordance with approved schedules. However, this may not always be the case so the fact that CIA schedules adequately cover paper records will not ensure the preservation of significant information that is maintained solely electronically. Some examples of instances where key records are now maintained electronically are provided below in the discussion of schedule implementation.

(U) Overview of Schedule Implementation for Textual Records

(U) NARA evaluators visited approximately 50 offices where the creation, maintenance and disposition of textual records was a primary focus of the visit. In most of these offices, the disposition of paper records was carried out in accordance with NARA-approved schedules. However, given the size and complexity of the CIA, it is difficult to extrapolate findings concerning schedule implementation in these offices to the agency as a whole. It is, nevertheless, clear that schedules do not reflect the degree to which CIA maintains significant record types in an electronic format and, consequently, there is a danger that important information will be lost.

(U) NARA is also concerned about other problems noted in office visits, particularly the misuse of the chronological files designation and the tendency observed in some offices for staff to view files as non-record simply because the information they contain is maintained in other locations. Given the importance of the records CIA generates, any improper disposition practices could result in the loss of significant documentation, even if such practices are the exception rather than the rule. Specific findings are provided below.

(U) At the highest level of the CIA, records of the Director, Deputy Director, and Executive Director are covered by schedules that provide for the permanent retention of substantive policy and correspondence files, meeting files, speeches, and schedules of daily activities. A

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1993 special study which NARA conducted revealed that CIA was applying these schedules properly. In the summer of 1997, NARA made a return visit to the DCI area and confirmed that records continue to be handled in an appropriate fashion.

> **(U)** Records that document the CIA's production of finished intelligence are also covered by NARA approved schedules that appear to be implemented properly. A copy of the President's Daily Brief (PDB) is systematically retired as a permanent record to the ARC by the staff responsible for its preparation, which is part of the DI. The current schedule for this series calls for the permanent retention of CIA's "stayback copy" of the PDB, but if the President returns an annotated copy, it is to be retained in place of the "stayback copy." In practice, CIA retains as permanent both the "stayback copy" of each PDB and the copy reviewed by the President, whether annotated or not. The schedule should be revised to reflect this.

(U) The ARC also holds papers related to the PDB accumulated prior to 19933, such as the memorandums, termed feedback notes, prepared by briefers that contain information concerning the reactions and questions raised by the President and other high level officials. However, the staff does not retain copies of memos that document planning for upcoming issues (though copies are sent to higher echelon offices). In addition, feedback notes are no longer maintained in paper and retired to the ARC but instead are created and maintained electronically. Likewise, proposed input for the PDB prepared by other DI offices is now provided electronically to the PDB staff and is retained there for only one month.

(U) Other DI serial intelligence products, which include National Intelligence Estimates (NIE-s), the Economic Intelligence Weekly (EIWs), and the National Intelligence Daily (NID), are also systematically retired in paper format to the ARC for permanent retention. However, these records are also maintained electronically and it is not clear if all versions and background materials that should be retained are being preserved. An analogous situation was noted at the National Photographic Interpretation Center (NPIC), which, at the start of FY 97, was transferred from CIA's DS&T to the newly formed National Imagery and Mapping Agency. The master copies of the hard copy reports NPIC analysts prepare based on imagery acquired from U.S. overhead reconnaissance activities are retired to the ARC for permanent retention. However, it is not clear if copies of all reports that are generated and distributed electronically are also being captured as permanent records.

(U) DS&T's component offices maintain as permanent records notices and similar issuances that establish and explain policies and procedures. The Office of the Director of the DS&T component responsible for open source collection also accumulates logs and log notes that document the component's policies. These records are permanent. Until recently these logs were printed out. However, this is not current practice.

(U) The bulk of the permanent textual records DS&T offices maintain are R&D project files, which are covered by approved schedules that appear to be implemented properly. DS&T also has an active history program that has produced studies that cover the Directorate, from its establishment in 1963 through 1989; a study for the period to 1995 is currently being prepared. Completed histories and related background documentation have been preserved and retired in accordance with the schedule. Some background files, however, include an intermingling with textual records of sound recordings and photographs, which should be maintained separately to ensure their preservation.

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