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Description of document: Central Intelligence Agency (CIA) progress reports on the CIA's records management program sent to Dr. Michael Kurtz Assistant Archivist for Records Services at the National Archives and Records Administration 2001-2006

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Central Intelligence Agency  
Washington, D.C. 20505  
Fax: 703-613-3007

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Central Intelligence Agency



Washington, D.C. 20505

30 March 2018

Reference: F-2017-002159

This is a final response to your 1 July 2017 Freedom of Information Act (FOIA) request for records pertaining to the **eight progress reports on the CIA's records management program that the CIA sent to Dr. Michael Kurtz at the National Archives and Records Administration**. We processed your request in accordance with the FOIA, 5 U.S.C. § 552, as amended, and the CIA Information Act, 50 U.S.C. § 3141, as amended.

We completed a thorough search for records responsive to your request and located eight documents consisting of 264 pages, which we can release in segregable form with deletions made on the basis of FOIA exemptions (b)(3), (b)(5), and (b)(6). Copies of the documents and explanation of exemptions are enclosed. Exemption (b)(3) pertains to information exempt from disclosure by statute. The relevant statutes are Section 6 of the Central Intelligence Agency Act of 1949, as amended, and Section 102A(i)(1) of the National Security Act of 1947, as amended. As the CIA Information and Privacy Coordinator, I am the CIA official responsible for this determination. You have the right to appeal this response to the Agency Release Panel, in my care, within 90 days from the date of this letter. Please include the basis of your appeal.

The cost associated with processing your request amounts to \$16.40. This consists of reproduction of 264 at a rate of 10 cents per page. As a requester in the "All Other" category, you are responsible for the cost of processing your request for reproduction charges beyond the first 100 pages. Please send your check or money order in the amount of \$16.40 payable to the **Treasurer of the United States** citing F-2017-02159 to ensure proper credit to your account.

If you have any questions regarding our response, you may contact us at:

Central Intelligence Agency  
Washington, DC 20505  
Information and Privacy Coordinator  
703-613-3007 (Fax)

Please be advised that you may seek dispute resolution services from the CIA's FOIA Public Liaison or from the Office of Government Information Services (OGIS) of the National Archives and Records Administration. OGIS offers mediation services to help resolve disputes between FOIA requesters and Federal agencies. You may reach CIA's FOIA Public Liaison at:

703-613-1287 (FOIA Hotline)

The contact information for OGIS is:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road – OGIS  
College Park, MD 20740-6001  
202-741-5770  
877-864-6448  
202-741-5769 (fax)  
[ogis@nara.gov](mailto:ogis@nara.gov)

Contacting the CIA's FOIA Public Liaison or OGIS does not affect your right to pursue an administrative appeal.

Sincerely,

A handwritten signature in black ink, appearing to read "Allison Fong", with a long horizontal flourish extending to the right.

Allison Fong  
Information and Privacy Coordinator

Enclosures

## Explanation of Exemptions

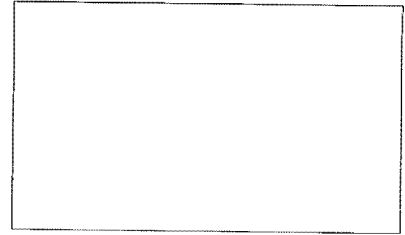
### Freedom of Information Act:

- (b)(1) exempts from disclosure information currently and properly classified, pursuant to an Executive Order;
- (b)(2) exempts from disclosure information which pertains solely to the internal personnel rules and practices of the Agency;
- (b)(3) exempts from disclosure information that another federal statute protects, provided that the other federal statute either requires that the matters be withheld, or establishes particular criteria for withholding or refers to particular types of matters to be withheld. The (b)(3) statutes upon which the CIA relies include, but are not limited to, the CIA Act of 1949;
- (b)(4) exempts from disclosure trade secrets and commercial or financial information that is obtained from a person and that is privileged or confidential;
- (b)(5) exempts from disclosure inter-and intra-agency memoranda or letters that would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) exempts from disclosure information from personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of privacy;
- (b)(7) exempts from disclosure information compiled for law enforcement purposes to the extent that the production of the information (A) could reasonably be expected to interfere with enforcement proceedings; (B) would deprive a person of a right to a fair trial or an impartial adjudication; (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy; (D) could reasonably be expected to disclose the identity of a confidential source or, in the case of information compiled by a criminal law enforcement authority in the course of a criminal investigation or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source ; (E) would disclose techniques and procedures for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law; or (F) could reasonably be expected to endanger any individual's life or physical safety;
- (b)(8) exempts from disclosure information contained in reports or related to examination, operating, or condition reports prepared by, or on behalf of, or for use of an agency responsible for regulating or supervising financial institutions; and
- (b)(9) exempts from disclosure geological and geophysical information and data, including maps, concerning wells.

April 2012



Washington, D. C. 20505



26 January 2001

(b)(3)

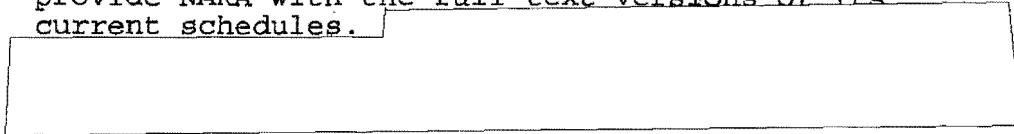
Dr. Michael J. Kurtz  
Assistant Archivist for Records  
Services - Washington, D.C.  
National Archives and Records Administration  
8601 Adelphi Road  
College Park, Maryland 20740-6001

Dear Dr. Kurtz:

The Central Intelligence Agency (CIA) appreciates the careful examination by officers of the National Archives and Records Administration (NARA) of our action plan to satisfy the recommendations contained in the 2000 NARA Evaluation of CIA Recordkeeping Practices. Your recognition of the progress this Agency already has made and the steps we have identified to improve our recordkeeping practices is most encouraging.

We were especially pleased that you concurred with the actions we proposed with respect to 30 of the 36 recommendations contained in your report. The remaining six are addressed below:

- Recommendation III/1: NARA requested that CIA provide NARA with the full text versions of its current schedules.



- Recommendation III/5b: NARA requested a revised Records Control Schedule item covering working files and sent us a draft revision. We are reviewing the NARA draft and our staffs will work closely together to craft the final language.
- Recommendations III/8, III/9 and VI/4a: NARA requested that certain permanent records be transferred to NARA sooner than the 50 years specified in the 1988 Memorandum of Agreement between the CIA and NARA. We are currently reviewing for declassification, under Executive Order 12958, permanent records that are 25 years

Dr. Michael J. Kurtz

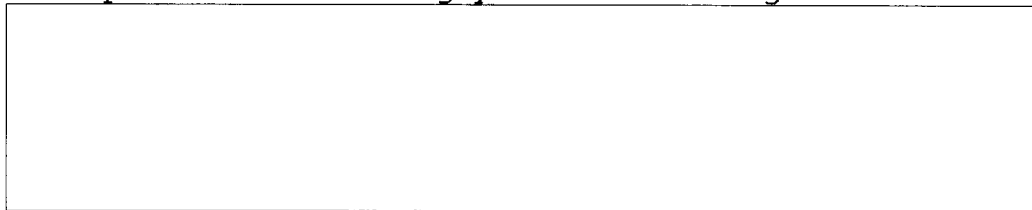
old. In the process of this review, we will identify all collections that can be transferred to NARA in less than 50 years.

- Recommendation VI/4b: NARA requested the immediate transfer of all Office of Strategic Services records. With two minor exceptions, that we are willing to discuss, this has been done.

Your letter also raises questions concerning the completion of actions for Recommendations II/6, IV/2, IV2a, IV2b, and IV2c. We would be pleased to meet with your Agency liaison officer to confirm our completion of these items and to demonstrate any of the systems mentioned below. More specifically:

- Recommendation II/6: NARA requested that all new accessions retired to the ARC be scheduled properly and preserved accordingly. This is being done.

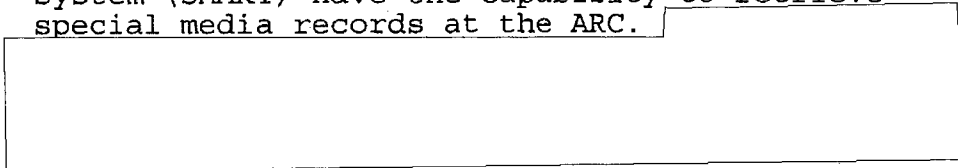
(b)(3)



In addition, we have enclosed the checklist that ARC personnel use to validate shelf list, records control schedule item, and preservation requirements for new accessions to our records center.

- Recommendation IV/2a: NARA requested that the Agency's Proactive Electronic Records Management System (PERM) give users the ability to designate e-mail as record or non-record. PERM does and we would be pleased to have your staff review this capability.
- Recommendation IV/2b: NARA requested that the Agency's Space Management and Retirement Tracking System (SMART) have the capability to retrieve special media records at the ARC.

(b)(3)



Dr. Michael J. Kurtz

- Recommendation IV/2c: NARA requested that the Agency's Management of Officially Released Information database (MORI) include all documents in series. We do not understand this recommendation. MORI contains a record of documents we have released in response to special search requests, FOIA and Privacy Act requests, and other similar requests. Not all documents in a given file series are responsive to these requests and only those documents which are responsive to a particular request are put into the MORI database.

Your letter also states that our response to Recommendation II/1 is incomplete, particularly in explaining how high level officials, including the Deputy Directors are made aware of recordkeeping requirements. We have written (enclosed) and will shortly distribute to all Agency employees, with a separate copy to each of our senior managers, a reminder about their records management responsibilities to include the requirement that the records they originate or receive are filed in an approved recordkeeping system and their duties upon leaving a position or government service.

We look forward to meeting with NARA representatives on all of the recommendations and hope we will be able to obtain your approval of our proposed actions with respect to the six remaining recommendations. In addition, we will submit an updated Recommendation and Milestones Matrix to NARA at the end of February 2001. If you have questions, please contact

(b)(3) [redacted] Chief of the Records and Classification Management Group, or me. [redacted] can be reached on [redacted] my number is [redacted] (b)(3)

(b)(3)

(b)(3)

Sincerely,

(b)(3)  
(b)(6)

[redacted signature box]

Director of Information Management

Enclosures:

1. New Permanent Retirement Job Quality Control/Preservation Checklist
2. Article to be sent to all employees

C05496169

Approved for Release: 2018/03/26 C05496169

**ENCLOSURE 1**

Approved for Release: 2018/03/26 C05496169



New Permanent Retirement Job  
Quality Control/Preservation Checklist

Date \_\_\_\_\_

Retirement Job Number \_\_\_\_\_

Number of Cubic Feet \_\_\_\_\_

Containers within 35 lb. limit? Y/N

Shelf list agreement with boxes submitted? Y/N

Acid-free boxes? Y/N

Service by box? Y/N

If service by box only, has IMO certified preservation? Y/N

Service by folder? Y/N

Folders numbered in sequential order in all boxes? Y/N

Record Preservation (Service by folder jobs only)

Acid-free folders in all boxes? Y/N

Removal of paper clips, metal fasteners, plastic bindings, and rubber bands? Y/N

Photos/newspaper clippings in polyester sleeves? Y/N

Thermofax and mimeograph documents replaced with photo copy? Y/N

Only acid free spacers in containers? Y/N

Is magnetic or film media in plastic or non-corrosive metal containers? Y/N

Reviewed by \_\_\_\_\_

Time for Review: \_\_\_\_\_ hours \_\_\_\_\_ minutes

UNCLASSIFIED

**ENCLOSURE 2**

**Records Responsibilities of Employees and Managers**

The National Archives and Records Administration requires us to periodically remind employees, particularly during a change in Administration, of certain records management responsibilities.

- Each employee, regardless of rank or position, has an official responsibility to create and maintain the records, electronic and non electronic, needed to document the activities of the component to which he or she is assigned.
  - These records would include cables, memoranda, e-mail, meeting minutes, instant messaging, audio and video recordings, and speeches.
- Prior to leaving the Agency, employees should ensure that the records they have received or created are in an approved recordkeeping system.
  - Duplicate copies that employees have maintained in their offices for reference purposes should be destroyed.
- Employees leaving the Agency are reminded that no official materials, including copies, whether or not classified, are to be removed from Agency facilities without authorization.
  - An employee may take information of a purely personal nature not associated with official Agency activities when departing CIA and public service.

If you have any questions regarding the retention of federal records, please consult with your Directorate<sup>1</sup> or component Information Management Officer or [redacted] Chief Records and Classification Management Group, Office of Information Management

(b)(3)

(b)(3)

[redacted]

(b)(3)

(b)(3)

(b)(3)

(b)(3)

<sup>1</sup> DA/IMO [redacted] DI/IMO [redacted] DO/IMO [redacted] DST/IMO - [redacted]  
 [redacted] DCI Area/IMO [redacted]

(b)(3)

(b)(3)

UNCLASSIFIED

(b)(3)

(b)(3)



Washington, D.C. 20505



7/9/01

(b)(3)

2 July 2001

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

Dear Dr. Kurtz:

Attached you will find our progress report detailing the steps we have taken to implement the recommendations proposed in the March 2000 National Archives and Records Administration (NARA) Evaluation Report, "Records Management in the Central Intelligence Agency (CIA)." The answers in our progress report also address issues raised in three letters from NARA to the Director, Office of Information Management, dated 17 October 2000, 7 December 2000, and 19 March 2001, respectively.

The Agency has made a great deal of progress in its efforts to improve record keeping practices since our letter to the Archivist of 5 September 2000. In fact, as the attached report indicates, we are confident that we have completed 30 of the 36 recommendations contained in your evaluation. Attached are some Agency notices, policy documents and procedures issued specifically to address needed changes to records management practices in CIA. The notices are referenced in the enclosed report. Other material, referenced in the report but not enclosed, can be reviewed at our Agency. A copy of this letter and the progress report has been copied to a 3.5" diskette and enclosed as you requested.

(b)(3)

(b)(5)



Dr. Michael J. Kurtz

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

[Redacted]

We would like to thank David Langbart, of the Life Cycle Management Division, for his continued assistance. Through personal visits to CIA and telephonic exchanges, he has helped us to identify the actions and/or materials that are necessary to satisfy many of the recommendations contained in your evaluation report.

(b)(3)

We look forward to NARA's concurrence that we have met the requirements for those 30 recommendations we believe are completed. If you have questions, please contact [Redacted] Chief of the Records and Classification Management Group, or me. [Redacted] can be reached on [Redacted] my number is [Redacted]

(b)(3)

(b)(3)

(b)(3)

Sincerely,

[Redacted Signature]

(b)(3)  
(b)(6)

Deputy Chief,  
Information Management Services

Enclosure

2 July 2001

**CIA Progress Report Concerning the Recommendations  
Contained in the March 2000 NARA Evaluation of "Records  
Management in the Central Intelligence Agency (CIA)."**

**Preface:**

There has been a major reorganization in the CIA that disestablished the Directorate of Administration (DA). Although the details of the new reorganization are yet to be completed, the Office of Information Management (OIM) and elements of the Directorates of Intelligence and Operations may be merged to establish a new Information Management (IM) organization reporting to the CIA Chief Information Officer (CIO).

The CIA's Executive Director placed on hold the further transition of the former DA offices to the Working Capital Fund (WCF). Accordingly, OIM will not pursue its transition to the WCF as reported in my letter of 5 September 2000.

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

This remains  
a fundamental part of the CIA Records Management Strategy.

• Recommendation I/1:

Ensure that there are sufficient IMOs in both OIT and the Directorates to implement the recommendations in this report.

Review workloads and staffing levels to determine whether or not IMOs should be assigned to organizations where day-to-day records management duties are currently handled by POCs.

CIA Response:

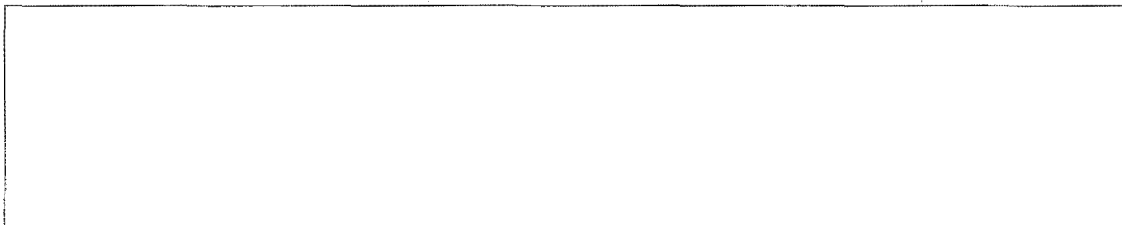
**Complete.**

The Agency is currently working under a model of one dedicated IMO per Agency component. There are three pilot operations where the IMOs are located in a "center" providing a full range of services to personnel in several components. In March 2001, the Directorate of Intelligence (DI), which had deployed DI careerists to serve as IMOs, elected to transfer both slots and personnel to OIM thereby ensuring that IM personnel (deployed to the DI) are of the highest caliber and that incumbents benefit from belonging to a uniform IM career service. In this transfer, the DI reestablished at least one position and upgraded all the IMO slots. With this decision, OIM now provides qualified IMOs to four of the five Agency directorates. The DO IMOs have been part of that directorate's career service, but that may change under the reorganization mentioned above. In either construct, DO IMOs adhere to both Federal and Agency regulations governing records management. More recently, OIM received authority to hire  new IM professionals to staff IM positions throughout the Agency and/or replace retiring IMOs.

(b)(3)

(b)(3)

(b)(5)



- Recommendation I/2:

After they have completed agency-required records management training classes, require IMOs to periodically take additional training to ensure their familiarity with records issues, policies, and procedures.

CIA Response:

Complete.

(b)(3)

[REDACTED] Each directorate IMO is required to identify the training each component IMO needs in order to meet the requirements of the position to which he/she is assigned and to be prepared for assignments of greater complexity and responsibility. Additionally, the OIM Curriculum Board (comprised of the Agency senior IM officers) advises the Director of OIM and the Dean of Information Management Institute (IMI), OIM, on the training and education programs that IMOs must attend (whether offered in-house or outside CIA).

- Recommendation I/3:

Develop a one-day course dealing with recordkeeping responsibilities of program staff including the application of approved records schedules to their files and basic records concepts such as distinguishing records from non-record materials.

CIA Response:

Complete.

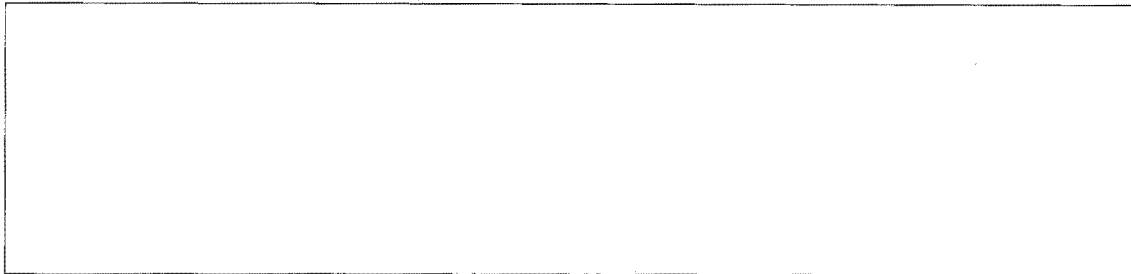
Training on records management responsibilities is offered to every new employee entering on duty with CIA. Additionally, records management training also is offered in two Agency courses directed respectively at employees with three years of service and with 15 years of service. In early 2000, OIM launched the



Information Management Computer-Based Training (CBT) program. The CBT has been made available to every Agency staff and contract employee through CIA's intranet. The program identifies and demonstrates (through interactive tests) the recordkeeping responsibilities for employees at all levels. Further, OIM is negotiating the addition of a records management module into two training courses, one on ethics (for government employees) and the other on information system security (INFOSEC). The courses are presented annually, and attendance is mandatory for all employees. Records Management training is presented continuously throughout an employee's career, which meets the spirit of this recommendation without the need for a separate dedicated eight-hour course.

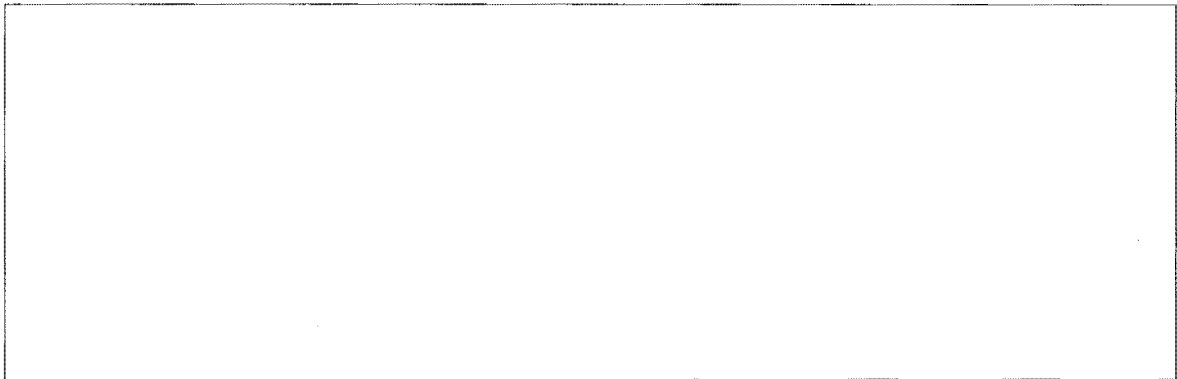
- Recommendation I/4:

(b)(3)



CIA Response:

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



- Recommendation I/5:

(b)(3)



(b)(3) [Redacted]

CIA Response:

(b)(3)  
(b)(5) [Redacted]

• Recommendation I/6:

(b)(3) [Redacted]

CIA Response:

(b)(3)  
(b)(5) [Redacted]

• Recommendation I/7:

(b)(3) [Redacted]

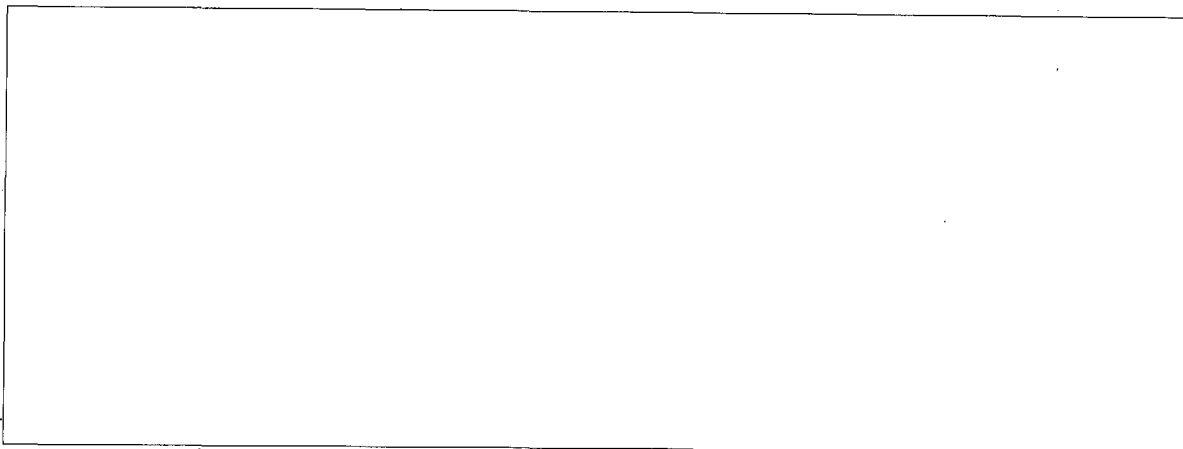
CIA Response:

Complete.

(b)(3)  
(b)(5) [Redacted]

(b)(3) [Redacted]

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



• **Recommendation II/1:**

Ensure that employees, including Deputy Directors and other high-level decision makers, are aware of requirements in Federal law and regulation to document and maintain in appropriate files all policy and decision-making actions, including those discussed via electronic mail (e-mail) or during telephone conversations.

**CIA Response:**

**Complete.**

As noted in our response under Recommendation I/3, above, we have established a variety of training venues to reach CIA employees at all levels throughout their careers.

Additionally, in early 2001, OIM generated three notifications to employees: an Employee Bulletin (sent to all contract and staff employees) that addressed "Records Responsibilities of Employees and Managers" (Attachment B); a "What's News" (the Agency newsletter) article on the same topic as the Employee Bulletin (Attachment C); and a memorandum to the Agency's Executive Director and four Deputy Directors entitled "Records Responsibilities of Senior Officials of the Central Intelligence Agency". These instructions include the definition of a "record" as well as the requirements for making and preserving records. In

the Bulletin, we defined records quite broadly as "cables, memoranda, e-mail, meeting minutes, instant messaging, audio and video recordings, and speeches." Although, we did not specifically mention "correspondence and intelligence reports"<sup>2</sup> in this Bulletin, they are manifest in the categories listed. We intend to reissue this instruction on a periodic basis and will expand the definition of Agency records accordingly. Finally, the OIM CBT training course provides specific guidance for handling "personal papers."

- Recommendation II/1a:

E-mail communications that meet the definition of records should be retained in a recordkeeping system.

CIA Response:

**Complete.**

CIA has well-established procedures for the capture and appropriate use of e-mail records

(b)(3)

Moreover, the three issuances referenced in our response to Recommendation II/1, above, makes specific reference to the preservation of e-mail as Agency records. A copy of our "E-Mail Quick Reference Guide" is enclosed. (Attachment E). The Proactive Electronic Records Management (PERM)<sup>3</sup> system, the Agency records management application, will enable employees to capture e-mail records into an official approved electronic recordkeeping system. In addition to the regulations mentioned above, the OIM CBT (see our Response to Recommendation I/3, above) also identifies e-mail as a potential record that requires preservation.

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<sup>2</sup> Your letter of 19 March 2001 to the Director, Office of Information Management requested that our bulletin to CIA employees include correspondence and intelligence reports as examples of CIA records.

<sup>3</sup> The PERM application captures, organizes, and preserves electronic document objects originated at or received by a computer terminal, including e-mail, word-processed documents, HTML pages, spreadsheets, et al.

- **Recommendation II/3:**

Monitor the implementation of the "Agency File Guide" to ensure that it is effective and meets the needs of the Directorates.

**CIA Response:**

**Complete.**

(b)(3)

The Agency File Plan is being used by the PERM application that is being deployed across the Agency (also see our Response to Recommendation II/1a, above). In addition, the Electronic Recordkeeping System (ERKS) Certification process, approved by the IPB in July 2000 as the mechanism for certifying automated information systems (AIS) as an electronic recordkeeping system, also requires system records be categorized according to the Agency File Plan.

- **Recommendation II/4:**

Ensure that adequate indexes are created where necessary and that staff who need to use them have familiarity with them.

**CIA Response:**

**Complete.**

The Agency ERKS Certification Process and Information Technology Streamlining (the process by which systems are approved for operation on the CIA computer infrastructure) require that systems have indices in order to retrieve and describe business records. OIM developed PERM to address the Agency's desktop originated electronic records; the Catalog of Databases (CATDB) is an on-line inventory of Agency databases; and AIRRS (the ARCINS/IPS Retirement Replacement System) database provides an index of all the records held at the Agency Records Center (ARC).

- Recommendation II/5:

Require the timely creation of indexing information concerning individuals of foreign intelligence or foreign counterintelligence interest following guidance in the existing DO instruction.

CIA Response:

**Complete.**

The Directorate of Operations (DO) branch responsible for completion of the records index increased its staff substantially, primarily with contractor support. The DO is working on an automated tool that will assist analysts with the extraction of person names to complete the index record.

- Recommendation II/6:

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.

CIA Response:

**Complete.**

In 1999, the ARC began to review all accessions to ensure that records are preserved and properly scheduled. The ARC developed and currently utilizes the "New Permanent Retirement Job Quality Control/ Preservation Checklist" which documents the inspection and correctness (appropriate application of the RCS and preservation techniques) of each retirement (Attachment G).

- Recommendation II/7:

Continue and extend the ARC preservation project. Implement a preservation project for older records held in locations other than the ARC.

CIA Response:

**Complete.**

The ARC checklist (see response to Recommendation II/6, above) will identify non-textual records held at the records center. In FY 2000, the ARC initiated a project to sample (biannually) microform media stored at the ARC. The project involves examining sample sets of film for evidence of deterioration. This project resulted in the relocation of all film-based records at the ARC to a cold room that meets the prevailing Federal temperature and humidity standards. Examination of the first sample set was completed and recorded in FY 2000. Re-examination of a sample of the baseline set as well as an additional sample will begin FY 2002.

The ARC has extended its preservation activities to extant records (film and paper) held in the facility. In addition to applying the "checklist" procedure to new accessions or returned loans, ARC personnel are systematically examining retired jobs for compliance with appropriate preservation standards. This inspection and preservation of older records, starting first with permanent records, will collect the metrics necessary to appropriately determine the costs for these activities.

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

Services OIM would provide include converting damaged or deteriorating records to stable (permanent) media, repackaging media in acid-free containers, etc.

On 28 February 2001, OIM issued an Agency-wide Employee Bulletin to address "Non-Textual Records

Preservation." (Attachment H) In this Bulletin, office heads were provided the conditions under which media is to be preserved and safeguarded. The notification encourages the use of the ARC to retain inactive or low use records because of the preservation activities there. In addition, employees are directed to contact the component IMO for assistance on any preservation issue.

• **Recommendation II/8:**

Continue the recent initiatives to revitalize the vital records program. Ensure that [redacted]

IMOs continue reviewing older vital records in the ARC, and identifying more recent vital records.

**CIA Response:**

**Complete.**

[redacted] Vital records are to be stored at the Agency records center. In FY1999, the ARC staff reviewed and validated with the owning component and respective IMO the vital records held at that facility. OIM has identified and is acquiring the equipment to be stored at the ARC necessary to support reading/using vital records from this location.

As part of the PERM records application deployment, each office will identify and tag vital records. [redacted]

(b)(3)

(b)(3)

(b)(3)

(b)(5)



- Recommendation II/9:

Consider conducting a mock emergency preparedness drill to ensure that, in an emergency, records are easily retrievable, all equipment needed to read the records is available, and that system documentation is adequate to operate any system that contains vital records.

CIA Response:

Complete.

As noted in our response to Recommendation II/8, above,

Periodically testing procedures, equipment and the viability of the data identified as "vital" are a part of this program.

- Recommendation III/1:

Review full text and skeleton schedules for declassification; provide full text schedules to NARA even if portions are security classified.

CIA Response:

Complete.

The CIA records control schedules will be forwarded to NARA the week of 2 July 2001. The appropriate Agency Information Review Officers (IROs) will review the schedules for declassification.

- Recommendation III/2:

Submit schedules for all unscheduled series, including series where records are now maintained electronically, particularly permanent series where paper documents are no longer printed out and filed.

**CIA Response:****Complete.**

As has been noted in correspondence from NARA, CIA records officers have been vigilant with regard to submitting disposition requests for new records series over the 50-year history of this agency. In the course of populating CATDB and deploying PERM, each IMO will confirm the disposition, or lack thereof, for each record series that exists in his/her respective component.

[REDACTED]  
[REDACTED] New records series will be submitted to NARA for a disposition determination.

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

**• Recommendation III/3:**

Ensure that all staff is familiar with the schedules that cover the records they accumulate.

**CIA Response:****Complete.**

The proper creation, preservation and disposition are covered in the training modules more fully described above under our response to Recommendation I/3. The Agency File Plan, the standard for organizing records in CIA, incorporates the prevailing GRS and Agency specific disposition authorities. As such, appropriate disposition is determined and applied consistently by use of this standard. The act of filing a document in accordance with the Agency File Plan marks the record with its disposition. Users can see both the description and retention period of any file under the Agency File Plan. The ERKS certification process also mandates the use of the Agency File Plan in order for an Automated Information System (AIS) to qualify as an approved electronic recordkeeping systems. Hence, records in these systems are similarly marked with the appropriate disposition.

- Recommendation III/4:

Work with NARA in the development of a revised schedule for DO operational project files; use this schedule as the basis for written guidance that is provided to those who review and/or process older operational files.

- CIA Response:

We are currently reviewing the proposed SF-115 for Operational Activity files. A formal CIA response regarding this item will be sent to NARA shortly.

- Recommendation III/5a:

Ensure that all staff that create or maintain records are familiar with and properly apply existing agency guidance pertaining to what is a record and the record status of working files, [REDACTED]

(b)(3)

- CIA Response:

Please see our Response to Recommendation III/5b, below. Specifically, OIM will promulgate an Employee Bulletin with respect to the appropriate use and disposition of "working files" once language for that series has been finalized. The IMO will be able to monitor the proper categorization of records, including those designated as working files, through the PERM records management application. [REDACTED]

(b)(3)

(b)(5)

- Recommendation III/5b:

Modify the description of working files included in the agency schedules so it incorporates the guidance in this regulation.

**CIA Response:**

CIA has offered suggested language describing working files in a letter to NARA, dated 26 April 2001. After agreement is reached between NARA and CIA, OIM will disseminate instructions to all CIA employees on the appropriate use and disposition of working files. All references in Agency schedules will be modified in accordance with the new item. Furthermore, Agency employees will receive training on this subject with the implementation of the Agency File Plan and PERM.

**• Recommendation III/6:**

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 NCI-263-85-1, Item 1e.

**CIA Response:**

The OIM records management instruction (see our Response to Recommendation I/3, above) cautions all users to seek guidance from OIM vis-à-vis the disposition of any information collection. The component IMOs provide guidance to component personnel, especially secretaries and registry personnel on the management of chron files. As with the validation of the proper use of working files, the IMO, via the PERM records management application, will monitor the use of electronic chron files.

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

**• Recommendation III/7:**

Continue the project to apply correct schedule items to ARC accessions improperly retired as permanent; include NARA review as part of the process.

**CIA Response:****Complete.**

(b)(3) As mentioned above, under our response to Recommendation II/6, the ARC initiated a quality control checklist to ensure that jobs retired to the ARC are assigned the proper RCS. Issues or challenges of misapplication of RCS items to retired jobs will be forwarded to the Agency Archival Review Team (AART) for resolution. The AART, as described [redacted] is comprised of the Agency senior directorate IMO's who will recommend to the Director, OIM, changes, if any, to a RCS assigned to records retired to the ARC. The Director of OIM will, as appropriate, request an additional review of the questioned material by NARA.

**• Recommendation III/8:**

Work with NARA to develop transfer instructions for permanent records that reduce the age at which CIA records are typically accessioned by NARA, provide for the transfer of entire series (or chronological segments thereof), and take into account CIA plans to review files for declassification electronically.

**CIA Response:****Complete.**

Under Executive Order 12958, we are currently reviewing for declassification all permanent records that are 25 years old and older. This review will enable us to identify all collections that can be transferred to NARA in less than 50 years.

**• Recommendation III/9:**

Work with NARA to develop a timetable for the transfer of specific files to the National Archives, with the goal of transferring by the year 2003 most permanent files cut-off prior to 1961.

**CIA Response:****Complete.**

As mentioned in our response to Recommendation III/8, above, we already are examining for transfer to NARA those permanent records originated prior to 1961, in compliance with Executive Order 12958. This is the most efficient, orderly, and cost effective way to examine for transfer our permanent record holdings. We will identify permanent materials that no longer have business value to the Agency for expedited transfer to NARA. Concomitant with this exercise, the Director, Office of Information Management, on 19 March 2001, sent to all Deputy Directors, a memorandum requesting the identification for consideration of transfer (to NARA) all 50 year-old and older CIA records (Attachment J).

**• Recommendation IV/1:**

Comply with NARA guidance contained in 36 CFR 1234 when electronic systems are developed, maintained, or upgraded. Of particular importance is the need to include migration strategies as part of the life cycle planning for electronic systems design and implementation.

**CIA Response:****Complete.**

The agency-wide implementation of the Electronic Recordkeeping System Requirements (ERKS) for Information Management System Certification complies with the guidance contained in 36 CFR 1234. Guidance contained in the Code of Federal Regulations (CFR) and in the NARA endorsed DoD 5015.2 Standard for Records Management Applications served as the basis for defining the ERKS process. The ERKS certification requires, among other conditions, testable system functionality to ensure the integrity and inviolability of electronic records. The certification process also requires a realistic and achievable migration plan for electronic records whose retention

is longer than the expected life of the system in which they are maintained.

- **Recommendation IV/2:**

Ensure that the major new systems ERMPO and individual Directorates are developing can fully meet the needs they were designed to satisfy.

**CIA Response:**

**Complete.**

See replies for Recommendations IV/2a through IV/2c, below.

- **Recommendation IV/2a:**

Include in PERM the capability for creators and recipients of e-mail to designate whether messages are record, non-record, or personal.

**CIA Response:**

**Complete.**

PERM does have the ability to designate e-mail as record, non-record, or personal. On 15 March 2001, the PERM application and functionality was shown to NARA representative, Mr. David Langbart. A copy of the PERM application users guide is enclosed. (Attachment K).

- **Recommendation IV/2b:**

Ensure that SMART has the capability to retrieve special media records in the ARC.

**CIA Response:**

**Complete.**

The SMART system, at present, only tracks box locations of retired records held at the ARC.

However, the AIRRS database, a companion application to SMART, has the ability to identify index entries (description of records in a retirement job held at the records center) according to media type. AIRRS will be subsumed into the new release of "SMART II." The new Smart application will include box tracking functions as well as box descriptions including folder number, folder title, and media inherited from the AIRRS database. On 15 March 2001, OIM provided NARA representative, Mr. David Langbart, with a demonstration of the AIRRS database functionality and the ability for the IMO to specify media type on retirement jobs.

- **Recommendation IV/2c:**

Ensure that all documents in series (except documents that by their nature cannot be converted, e.g., bulky enclosures) are included in MORI. Ensure that systems are compatible with standards developed for the entire Intelligence Community.

**CIA Response:**

**Complete.**

MORI maintains the documents released to the public, for example, under FOIA and Executive Order 12958 mandatory requests. The documents in MORI are copies of the original records that continue to be maintained within the file series of which they are a part. Unless a request was for an entire record series, MORI would contain only those documents (normally a subset from one or more record series) released in response to the inquiry. On 29 March 2001, OIM provided a demonstration of MORI and the material maintained therein to NARA representative, Mr. David Langbart.

- **Recommendation IV/3:**

Disseminate the Agency e-mail regulation to all Agency staff who use e-mail and monitor its implementation. Update this issuance as NARA develops new



guidance concerning the maintenance and disposition of e-mail.

**CIA Response:**

**Complete.**

CIA already has established procedures for the capture and appropriate use of e-mail records, documented in Agency regulations. These regulations were disseminated to all employees. The regulations are on-line in Agency regulatory databases available to CIA employees. In addition, the appropriate capture of e-mail as a record continues to be articulated in training and periodic reminders (see our response to Recommendation I/3, II/1 and II/1a, above). The PERM records management application provides users with an easy way to capture e-mail in its native form.

• **Recommendation IV/4:**

Complete the centralized catalog project so the Agency will have a comprehensive, Agency-wide inventory of electronic records. After the centralized catalog is completed, implement measures to keep it current as additional systems are developed.

**CIA Response:**

**Complete.**

CATDB has been redesigned and a deployment schedule has been developed. IMOs already have been instructed to populate CATDB, and substantial progress has been made in two of the five Agency directorates. The population of CATDB is a mandatory condition in the new IT Streamlining process mentioned above in our response to Recommendation II/4, [REDACTED]

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- Recommendation IV/5:

Using the centralized catalog data as well as pre-existing inventories and lists, work with NARA to initiate and carry out a project to ensure that all CIA electronic record systems are eventually covered by NARA-approved schedules.

This effort should begin as soon as possible, using existing inventory information, and should encompass the review and coordination with NARA of housekeeping systems to determine which are covered by the GRS and which are not. Develop schedules for non-GRS records, beginning with those that pertain to CIA's core missions and are the most likely to be appraised as permanent.

CIA Response:

**Complete.**

As explained above, in our Response to Recommendation IV/4, above, CATDB is being populated. Each system entered into CATDB must identify a disposition authority to cover the records maintained in that system. Records and/or systems for which there is no prevailing GRS or Agency records control schedule will be described (on Standard Form 115) and sent to NARA for a disposition authority. In conjunction with the CATDB population, OIM has initiated an annual ERKS certification program to identify all AIS systems that must be certified against this Agency standard. The certification process requires the system owner to be able to identify, designate and preserve the record (maintained in that system) through the record lifecycle.

- Recommendation V/1:

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[Redacted]

CIA Response:

Complete.

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[Redacted]

• Recommendation VI/1:

Issue specific guidance concerning the creation, maintenance, and disposition of non-textual 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)

[Redacted]

CIA Response:

Complete.

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[Redacted]

[Redacted] On 28 February 2001, OIM issued an Employee Bulletin entitled "Non-Textual Records Preservation" which provided specific guidance on disposition, creation and maintenance of non-textual records.

- Recommendation VI/2:

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

CIA Response:

Complete.

As mentioned in our Response to Recommendation VI/1 above,

(b)(3)

[redacted] OIM, in February 2001, issued an Agency-wide Employee Bulletin entitled "Non-Textual Records Preservation," to provide specific guidance in disposition, creation and maintenance of non-textual records. The Employee Bulletin refers employees to the component or Directorate IMO for any questions of preservation, migration of records, and transfer of inactive records to the Agency record center. Records transferred to the ARC, including video recordings, will be inspected for compliance with prevailing archival practices. (See our responses to Recommendations II/6 and II/7, above).

- Recommendation VI/3:

Inventory non-textual records and develop schedules for all unscheduled series as well as specific schedule items for certain major collections now covered by generic authorities as identified in this report [redacted]

(b)(3)

CIA Response:

Complete.

The Agency IMOs periodically conduct full or partial inventories of component holdings that would identify non-textual records not covered by an existing disposition authority. As mentioned in our responses to Recommendations III/2, IV/4 and IV/5,

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each IMO will use [redacted] the CATDB to identify any record series, textual and non-textual, for which there is no applicable RCS. The IMO would prepare and send to NARA a Standard Form 115 describing the system(s) and/or record series and proposed disposition.

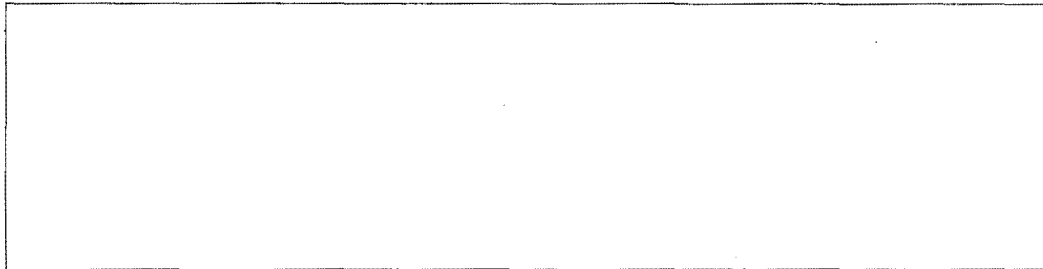
• Recommendation VI/4a:

Modify schedules to accelerate the transfer of non-textual records to NARA custody.

CIA Response:

Complete.

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• Recommendation VI/4b:

Immediately transfer the OSS map collection to NARA.

CIA Response:

Complete.

Our records indicate that we transferred to NARA 105 cubic feet of permanent material on 23 April 1985, Accession Job NN3-226-85-2. Included among these records were: Entry 151 described as ½ cubic feet of OSS Map Records, SF 115 Item No. 83, bearing no CIA Job Number.

The OSS Map Collection was one of nine bodies of permanent OSS records, identified in your letter of 12 March 2001, as yet to be transferred to NARA. We

are addressing this issue in separate correspondence you will receive shortly.

• Recommendation VI/5:

Develop and implement a plan to preserve non-textual 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 non-textual records, copying permanent records maintained on obsolete media to contemporary formats, and the review of the ARC's non-textual holdings to identify accessions in need of preservation action. Particular attention should be paid to locating non-textual records contained in accessions retired to the ARC prior to 1978.

CIA Response:

Complete.

As mentioned above in our response to Recommendations II/6 and II/7, OIM already has instituted a process to ensure that all record series are properly preserved. Guidance on disposition and preservation consistent with current Federal requirements was re-issued [redacted]

(b)(3)

[redacted] Additionally, on 28 February 2001, an Employee Bulletin was issued on "Non-Textual Records Preservation." Processes such as the ARC use of its checklist are now in place to ensure that permanent records are properly preserved. This includes provisions to migrate records to archival medium. Also mentioned in our response to Recommendation II/7 above, is the OIM initiative to examine all textual and non-textual permanent holdings at the ARC to ensure that records meet prevailing preservation standards. The system inventories that will be done [redacted] the review of CATDB systems, and the examination of records practices in conjunction with the deployment of PERM will identify any permanent, non-textual materials held outside the ARC that require actions to safeguard

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their integrity, stability, authenticity, form, format and continued readability.

In February 2000, OIM identified all of its microfilm stored at the ARC and, in accordance with Federal guidelines, sampled the film for evidence of any deterioration. All permanent film is in the ARC "cool room" which meets prevailing Federal temperature and humidity standards for this medium. ARC staffers perform temperature and humidity data analysis to ensure the humidity and temperature environment remains constant.

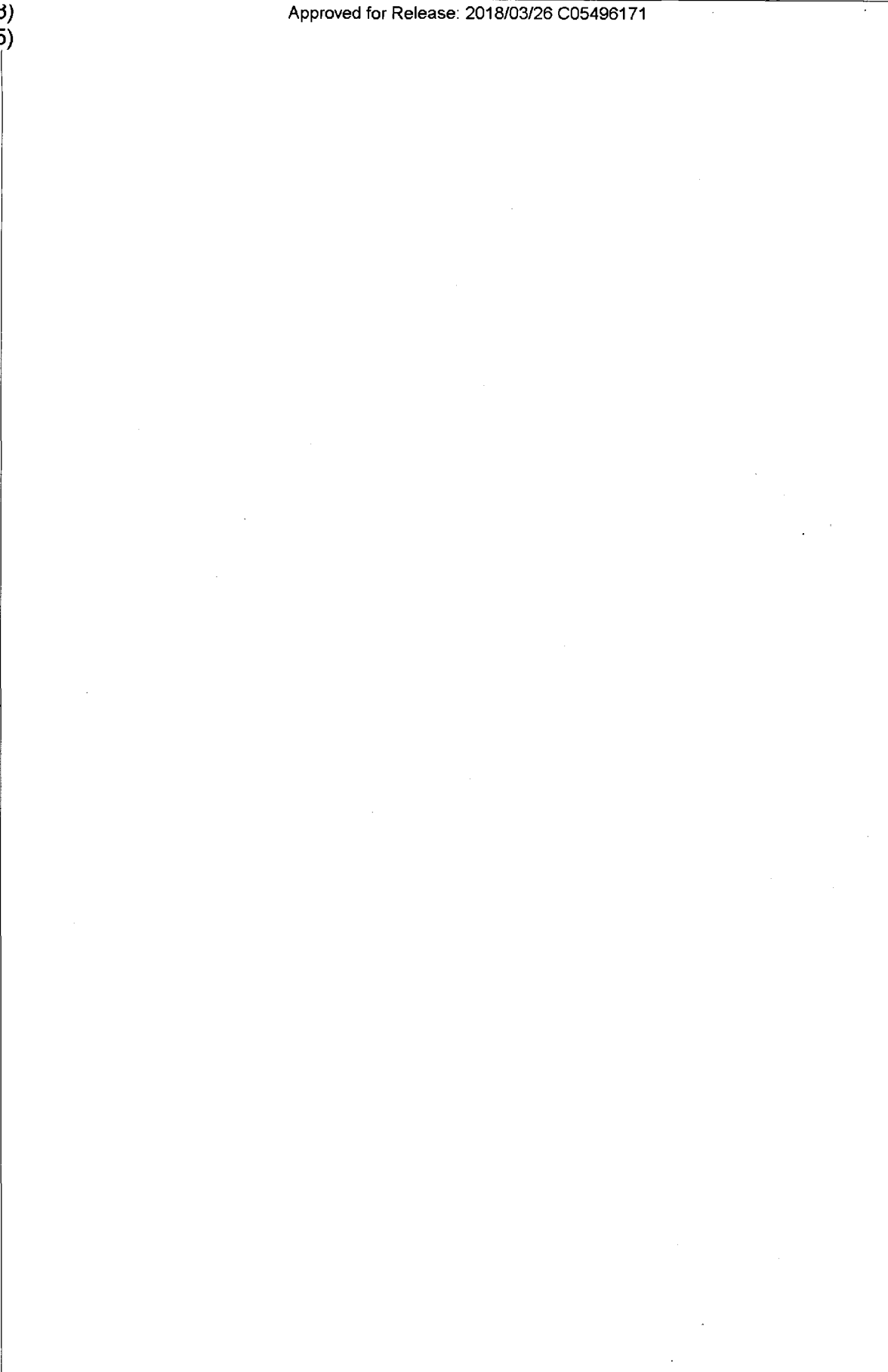
Over the past three years, the ARC has undergone renovations costing several hundreds of thousands of dollars to meet prevailing fire and safety standards required of records centers.





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~~ADMINISTRATIVE - INTERNAL USE ONLY~~


# EMPLOYEE BULLETIN

~~██████████~~  
15 January 2001

~~(U//FOUO)~~ **RECORDS RESPONSIBILITIES OF EMPLOYEES AND MANAGERS**

(U) The National Archives and Records Administration requires us to periodically remind employees, particularly during a change in Administration, of certain records management responsibilities.

- Each employee, regardless of rank or position, has an official responsibility to create and maintain the records, electronic and non electronic, needed to document the activities of the component to which he or she is assigned.
- These records would include cables, memoranda, e-mail, meeting minutes, instant messaging, audio and video recordings, and speeches.
- Prior to leaving the Agency, employees should ensure that the records they have received or created are in an approved recordkeeping system.
- Duplicate copies that employees have maintained in their offices for reference purposes should be destroyed.
- Employees leaving the Agency are reminded that no official materials, including copies, whether or not classified, are to be removed from Agency facilities without authorization.
- An employee may take information of a purely personal nature not associated with official Agency activities when departing CIA and public service.

~~(U//FOUO)~~ If you have any questions regarding the retention of federal records, please consult with your Directorate (DA/IMO - ~~██████████~~ DI/IMO - ~~██████████~~ DO/IMO ~~██████████~~ DST/IMO ~~██████████~~ DCI Area/IMO - ~~██████████~~ or component Information Management Officer ~~██████████~~ Chief Records and Classification Management Group, Office of Information Management ~~██████████~~

~~ADMINISTRATIVE - INTERNAL USE ONLY~~





February 5, 2001 [REDACTED]

Headlines: (~~U//AFO~~) Records Responsibilities of Employees and Managers

(~~U//AFO~~) **Records Responsibilities of Employees and Managers**

(~~U//AFO~~) The National Archives and Records Administration requires us to periodically remind employees, particularly during a change in Administration, of certain records management responsibilities.

(~~U//AFO~~) Each employee, regardless of rank or position, has an official responsibility to create and maintain the records, electronic and non-electronic, needed to document the activities of the component to which he/she is assigned. These records include cables, memoranda, e-mail, meeting minutes, instant messaging, audio and video recordings, and speeches.

(~~U//AFO~~) Prior to leaving the Agency, employees should ensure that the records they have received or created are in an approved recordkeeping system. Duplicate copies that employees have maintained in their offices for reference purposes should be destroyed. Employees leaving the Agency are reminded that no official materials, including copies, whether or not classified, are to be removed from Agency facilities without authorization.

(~~U//AFO~~) An employee may take information of a purely personal nature not associated with official Agency activities when departing CIA and public service.

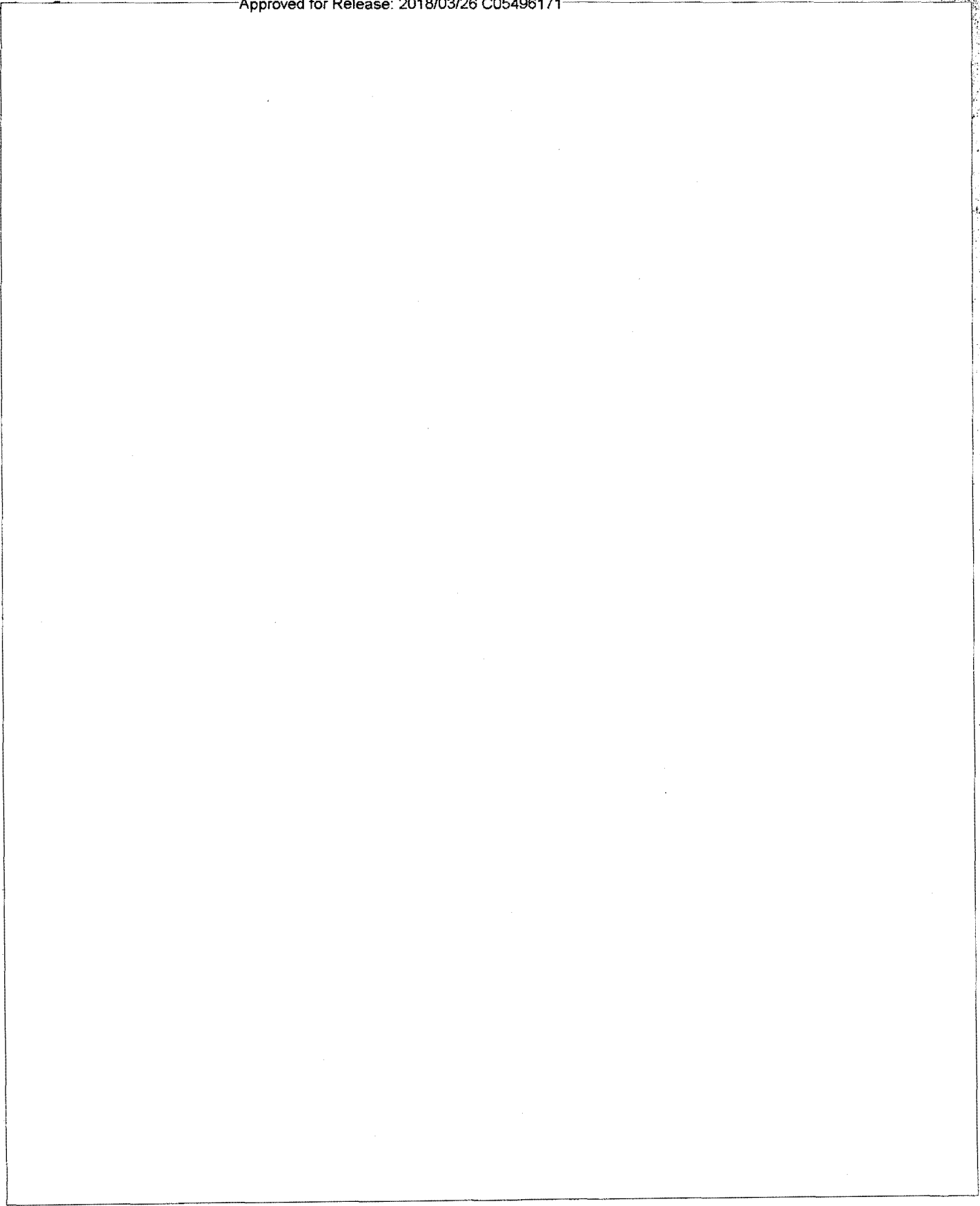
(~~U//AFO~~) If you have any questions regarding the retention of federal records, please consult with your Directorate or component Information Management Officer or [REDACTED] Chief/Records and Classification Management Group, Office of Information Management [REDACTED] (This is UNCLASSIFIED [REDACTED])







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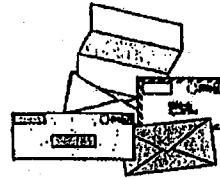
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Approved for Release: 2018/03/26 C05496171

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Approved for Release: 2018/03/26 C05496171

## E-Mail Quick Reference Guide



### **E-MAIL MUST BE RETAINED WHEN THEY:**

- are made or received by the Agency and
- show the formulation and execution of basic policies and decisions and any associated actions; or
- are minutes of meetings related to any Agency activity; or
- facilitate action by Agency officials and their successors; or
- report Agency activities or business to Congress and other legal entities;
- protect the financial, legal, and other rights of the Agency and of persons directly affected by the Agency's actions, or
- transmit, through attachments, record information.

### **EXAMPLES OF E-MAIL WHICH SHOULD BE RETAINED ARE:**

- substantive comments on draft memoranda or analyses;
- documentation of Agency decisions and commitments reached orally;
- information of value about Agency activities and significant programs;
- information that adds to understanding of Agency operations and responsibilities; or
- official command channel communications.

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For additional information,  contact your component or Directorate Information Management Officer (IMO).

**MANAGING THE DISPOSITION OF E-MAIL:**

E-mail must be retained in accordance with official Record Control Schedules. Contact your component IMO or Directorate IMO to help you determine the retention schedule for your e-mail.

E-mail which need not be kept for longer than 30 days may be kept in electronic form and deleted when no longer needed.


E-mail which must be kept for longer than 30 days shall be printed to paper and kept in a paper recordkeeping system. A copy of these records should be maintained in their electronic form to facilitate their transfer to an electronic recordkeeping system.


**PRINTING E-MAIL**


When printing e-mail that must be retained, the following steps should be followed:


- print the E-mail, and all attached documents including hidden text;
- print any return receipt you received for the message; and
- file the message and receipt information in an appropriate hardcopy file.

**REMEMBER THAT:**

 The Agency E-mail system is for official or Agency approved uses

 E-mail must be properly classified and portion-marked.



 E-mail is subject to search and retrieval for legal or investigative purposes, including requests pursuant to the Freedom of Information Act and the Privacy Act.

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New Permanent Retirement Job  
Quality Control/Preservation Checklist

Date \_\_\_\_\_

Retirement Job Number \_\_\_\_\_

- Number of Cubic Feet \_\_\_\_\_ - - -

Containers within 35 lb. limit? Y/N

Shelf list agreement with boxes submitted? Y/N

Acid-free boxes? Y/N

Service by box? Y/N

If service by box only, has IMO certified preservation? Y/N

Service by folder? Y/N

Folders numbered in sequential order in all boxes? Y/N

Record Preservation (Service by folder jobs only)

Acid-free folders in all boxes? Y/N

Removal of paper clips, metal fasteners, plastic bindings, and rubber bands? Y/N

Photos/newspaper clippings in polyester sleeves? Y/N

Thermofax and mimeograph documents replaced with photo copy? Y/N

Only acid free spacers in containers? Y/N

Is magnetic or film media in plastic or non-corrosive metal containers? Y/N

Reviewed by \_\_\_\_\_

Time for Review: \_\_\_\_\_ hours \_\_\_\_\_ minutes

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~~ADMINISTRATIVE - INTERNAL USE ONLY~~

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# EMPLOYEE BULLETIN



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28 February 2001

## (U) NON TEXTUAL RECORDS PRESERVATION

(U) The National Archives and Records Administration (NARA) has determined that the Agency Archives and Records Center (AARC) meets the Federal standards to ensure that records maintained at the AARC are properly safeguarded and preserved. The AARC not only maintains a controlled environment but also periodically reviews film and other non textual media for signs of potential deterioration.

(U) NARA requires that Agency component managers, who permit component records to be stored outside of the AARC or at another NARA approved facility, be advised of their responsibilities to properly maintain and preserve official business records in accordance with Federal regulations .

(U) Of particular concern to NARA is the preservation of non textual records, including: microfiche; microfilm; motion picture film; photographs; imagery; film stripes; sound and video recordings; posters and other graphic works; multimedia productions with related finding aids; and x-rays. Each of these media requires appropriate handling and storage in order to preserve the information contained therein. Agency offices that store non textual media in their areas or with another storage provider (other than the AARC) are reminded to ensure that:

- Audiovisual media records are stored in a facility where the temperature does not exceed 70 degrees Fahrenheit and relative humidity is below 50 percent. (Lower temperature and humidity levels prolong the useful life of these records.)
- Film records requiring long-term retention be of the polyester-based silver gelatin type as opposed to cellulose-acetate film which deteriorates over time.
- Equipment intended for projection or playback of all non textual media be in good working order.
- Permanent audiovisual records be inspected every two years for damage or deterioration.
- All photographs are placed in inert plastic sleeves. (Inert plastics and other storage

materials are described in ANSI/NAPM IT9.11-1998 standard.)

- All media is packaged in inert plastic, non-corroding metal, or acid-free paper based containers.
- Silver gelatin originals are separated from non-silver reference copies and, if necessary, stored off-site of the customer premises.

(U//~~FO~~) Component managers may wish to consider using the AARC to store non textual materials which they now maintain within their office or other facilities under their control. Questions regarding the preservation of non textual media can be addressed to AARC personnel on secure extension [REDACTED] or to your Directorate or component Information Management Officer.

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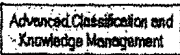





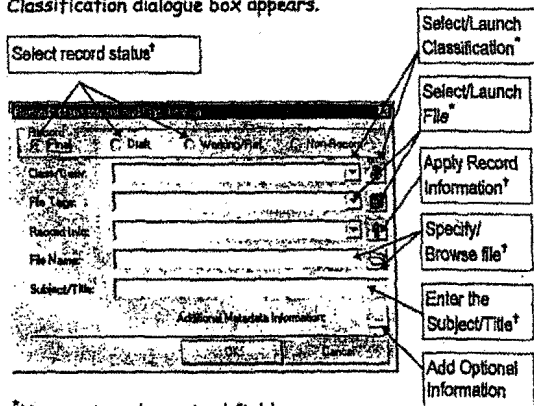
# 1 Launch PERM

Deposit documents and Lotus Notes into PERM that have continuing value to you, your workgroup, or the Agency.

There are several ways to start the PERM application including:

- From within Lotus Notes, Click 
- From within MS-Word and Excel, select "PERM" from the menu, then select "File to PERM Repository"..
- From the desktop, double click the PERM icon 
- From the NT Explorer:
  - "Drag and Drop" the record from the Explorer window to the PERM icon, or
  - "Send To" command on the Explorer window

When PERM is invoked, the Records Management and Classification dialogue box appears.



\*User-entered, required fields  
\*System defaulted or user entered

K

OIM 01-0506  
19 March 2001

MEMORANDUM FOR: Executive Director  
Deputy Director for Administration  
Deputy Director for Intelligence  
Deputy Director for Operations  
Deputy Director for Science and Technology

(b)(3) FROM:   
Director of Information Management, DA

SUBJECT: (U) Identification of Agency Permanent  
50-year-old Records for Transfer to the  
National Archives

1. (U//~~FOUO~~) Action Requested: Your support and assistance is requested to identify Agency permanent records in your Directorate that are dated prior to 1953. This request is in support of an agreement between the Agency and the National Archives and Records Administration (NARA) that Agency permanent records will be transferred to NARA when they become 50 years old unless the DCI determines that continued Agency retention is required.

2. (U//~~FOUO~~) Background: By law, every Federal agency submits to NARA a records control schedule that lists all of its records and identifies which of them it believes should be permanent and which should be temporary and may be destroyed after a period of time. NARA reviews and approves the records control schedule and has done so with respect to Agency records. Most agencies store records not immediately needed at a Federal Records Center, and by law are required to transfer permanent records to NARA when they become 30 years old. The Agency does not send its records to Federal Records Centers but rather sends them to the Agency Archives

Unclassified//~~FOUO~~ when  
Separated from Attachments

~~SECRET~~//~~K1~~

SUBJECT: (U) Identification of Agency Permanent  
50-year-old Records for Transfer to the  
National Archives

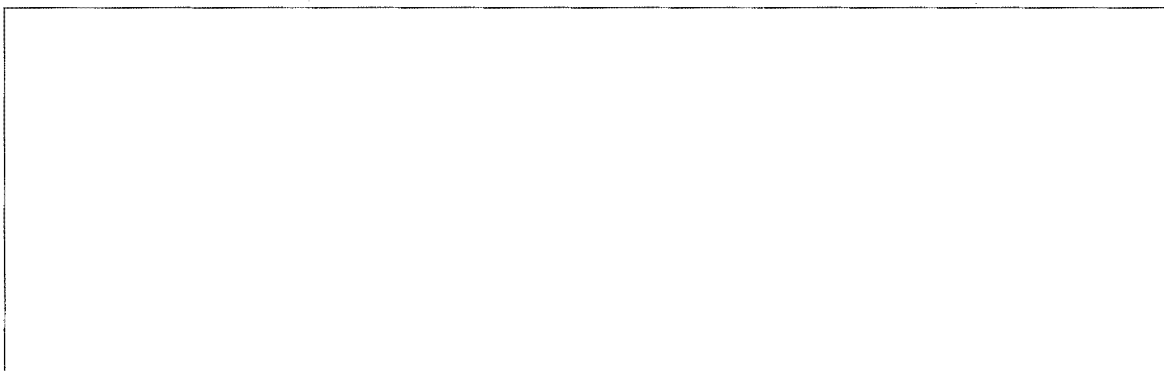
and Records Center (AARC). In addition, CIA negotiated an agreement with NARA to retain our permanent records for 50 years rather than 30 years before transferring them to NARA for classified storage as appropriate.

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(b)(5)



SUBJECT: (U) Identification of Agency Permanent  
50-year-old Records for Transfer to the  
National Archives

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



7. (U) Please direct any questions on this activity  
to [REDACTED] OIM/ODC, [REDACTED] or your Directorate  
IMO. Thank you for your assistance in this matter.

(b)(3)



Attachments:

- A. Listing of Permanent Records  
Stored at the AARC
- B. Listing of Permanent Records  
Control Schedule Items
- C. Form Letter for Submitting  
Response to this Request
- D. Agency Transfer Plan



Washington, D.C. 20505

10/4/02

27 September 2002

(b)(3)

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

Dear Dr. Kurtz:

(U) Enclosed is our progress report pertaining to the recommendations you made in your March 2000 Evaluation Report of Records Management in the Central Intelligence Agency. This response focuses on those recommendations you indicated are not yet closed. Also, enclosed is a list of the attachments we are sending to you in an accompanying notebook. These attachments, some of which are classified, are exemplars of material requested and/or evidence of our actions to satisfy open recommendations.

(b)(3)

(U) If you have questions, please contact [redacted] Chief of the Records and Classification Management Group, or me. We strongly recommend a meeting to discuss any unsatisfied recommendations prior to a response letter. [redacted] can be reached on [redacted] my number is [redacted]

(b)(3)

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Sincerely,

[redacted signature box]

(b)(3)  
(b)(6)

Deputy Director,  
Information Management Services

(U) Enclosures:

- A. September 30, 2002, Progress Report on the March 2000 NARA Evaluation of CIA Record Keeping Practices
- B. List of Attachments

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Enclosure A

September 30, 2002, Progress Report on the March 2000  
NARA Evaluation of CIA Record Keeping Practices

• Recommendation I/1:

(U) Ensure that there are sufficient IMOs in both OIT and the Directorates to implement the recommendations in this report.

(U) Review workloads and staffing levels to determine whether or not IMOs should be assigned to organizations where day-to-day records management duties are currently handled by POCs.

CIA Response:

(U//~~FOUO~~) Information Management Services (CIO/IMS) provides IMO support in each directorate, including the Directorate of Operations, and the DCI and MSO areas. IMS periodically reviews the level of IMO support needed. Indeed, we currently are conducting a zero base review of these information management positions to ensure that we understand current workloads and can adjust staffing levels as appropriate. In the last eighteen months, we have added  IMO positions. New IMOs have professional degrees and experience in library, information, and archival science, records management, information technology, and business. We will continue to monitor the IMO needs of the organization and adjust our IM workforce accordingly.

(U//~~FOUO~~) You expressed concern in your 23 October 2001 letter about over-reliance on Proactive Electronic Records Management (PERM) and asked what steps are being taken to ensure that records being created in non-PERM organizations are being handled properly. We have been sensitive to this issue and our component IMOs, as a major part of their responsibilities, have worked to ensure proper management of paper records in these components. We are pleased to note, however, that PERM has the full

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endorsement of the Agency Chief Information Officer (CIO) and already has been deployed to over 1600 officers. The PERM application is scheduled to be on every workstation by the close of FY2004. PERM will be the electronic repository for all electronic records not already captured in another approved system. The electronic record keeping system (ERKS) certification process (which complies with DoD 5015.2) will assure the integrity, authenticity, and preservation of electronic records outside of PERM.

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(U//~~FOUO~~) We have also provided a copy of the 14 June 2000 presentation to the Directorate of Administration Corporate Board (attachment #2) on the Agency records management program, as you requested.

- Recommendation I/2:

(U) After they have completed agency-required records management training classes, require IMOs to periodically take additional training to ensure their familiarity with records issues, policies, and procedures.

CIA Response:

(U//~~FOUO~~) In response to the request in your 23 October 2001 letter, we have enclosed a copy of the

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curriculum each IMO currently is required to take. You should also know that we have formed an Agency Information Management Occupational Council (AIMOC) that is updating and refining the skills and competencies required of our IMOs. IMS established a curriculum board to identify the training needed under the AIMOC structure; the revised FY'02 and '03 course schedules (attachments #4 and 5) are included.

- Recommendation I/3:

(U) Develop a one-day course dealing with record keeping responsibilities of program staff including the application of approved records schedules to their files and basic records concepts such as distinguishing records from non-record materials.

CIA Response:

(U//~~FOUO~~) Instead of developing a one-day course on records management for all employees, our training is ongoing and continuous throughout the year and throughout the employee's career with CIA. This is accomplished in three ways. First, IMOs provide records management training at major Agency courses, such as Entrance on Duty training, training given after the probationary period, at the mid-career course, etc. Second, we have developed records and classification management Computer Based Training (CBT) that all employees will be required to take each year. Third, our IMOs provide tailored briefings to components annually and as needed to address Records Management issues. These tailored briefings, given as frequently as the component IMO believes is necessary, cover a wide variety of topics, including: the Agency File Plan and record control schedules, the Electronic Record Keeping System (ERKS) certification requirements, electronic records categorization, the Agency Classification Guide, NARA evaluation recommendations, forwarding records to NARA, archive media conversion, supplies management, the Agency and Intelligence Community Metadata Standards, Proactive Electronic Records Management System (PERM) roll-out, and Agency forms management.

(U//~~FOUO~~) We continue to work with the program managers of the annual INFOSEC and ETHICS courses for the appropriate inclusion of information on an employee's records management responsibilities. However, an expanded CBT program on records management will likely be the preferred way to deliver mandatory records training.

(U//~~FOUO~~) We include a compact disc of our current CBT program (attachment #6) and samples of records

management presentations made in Agency courses and at the component level (attachments #7-#12).

- Recommendation I/7:

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CIA Response:

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- Recommendation II/1:

(U) Ensure that employees, including Deputy Directors and other high-level decision makers, are aware of requirements in Federal law and regulation to document and maintain in appropriate files all policy and

decision-making actions, including those discussed via electronic mail (e-mail) or during telephone conversations.

**CIA Response:**

(U//~~FOUO~~) To address your recommendations, we have our draft Employee Bulletin (attachment #17) providing guidance for CIA employees and managers on: the definition of a record, treatment of personal papers, guidance on working files as records, handling databases and other electronic records, and identifying the types of documents that could potentially serve as records at CIA. We are providing you with a copy of that draft and will publish it after your review.

(U//~~FOUO~~) You also ask about the IMO-provided tailored briefings; please see attachments #7-#12.

(U//~~FOUO~~) Finally, you ask for a copy of the memorandum "Records Responsibilities of Senior Officials of the Central Intelligence Agency"; please see attachment #18.

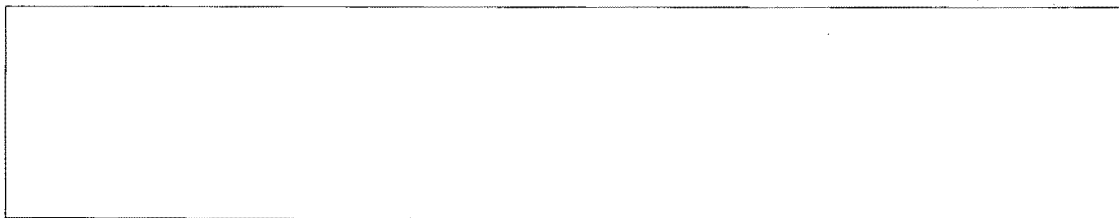
• **Recommendation II/1a:**

(U) E-mail communications that meet the definition of records should be retained in a record keeping system.

**CIA Response:**

(U//~~FOUO~~) CIA has drafted a new Employee Bulletin (attachment #17) to address the proper use of e-mail on Agency systems.

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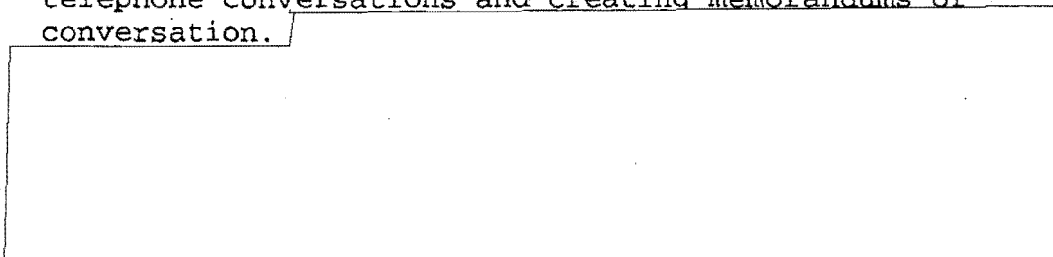
- Recommendation II/1b:

(U) Telephone conversations should be documented through memoranda to the file.

CIA Response:

(U//~~FOUO~~) CIA has drafted guidance for documenting telephone conversations and creating memorandums of conversation.

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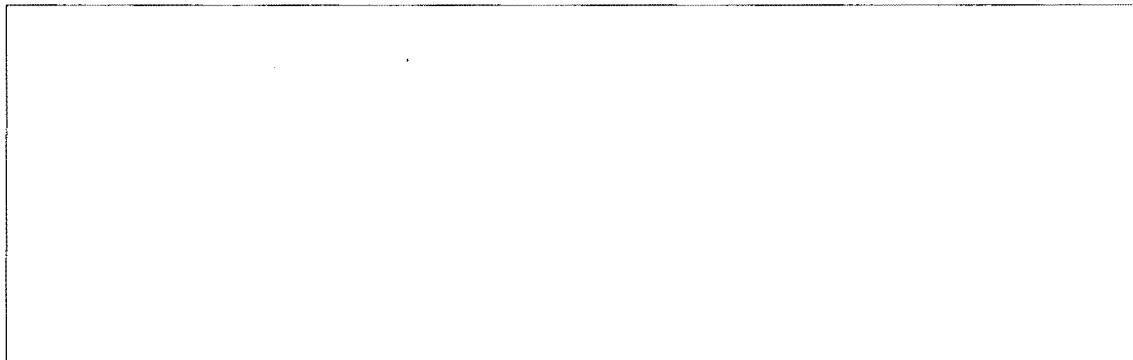
- Recommendation II/2:

(U) Ensure that employees follow CIA guidance requiring the creation and maintenance of files to document agency activities.

CIA Response:

(U//~~FOUO~~) Per our response to Recommendation I/3 above, we have included exemplars of the types of briefings given annually (or more frequently, as needed) to employees regarding record keeping responsibilities (attachments #7-#12). Our CBT training (attachment #6) also provides guidance to all employees on proper record keeping practices. The CBT is being updated and will be redeployed to the employee desktop in FY2003.

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• Recommendation II/3:

(U) Monitor the implementation of the Agency File Guide to ensure that it is effective and meets the needs of the Directorates.

CIA Response:

(U//~~FOUO~~) The Agency File Plan was developed by arranging each of the record control items covered in the existing Agency-unique and appropriate General Records Schedule items into a taxonomy. The taxonomy (file plan) not only represents Agency activities (and associated records), but also attaches (assigns) the disposition to each record "filed" to one of the categories (record series) in the plan. The Agency File Plan, used in electronic and non-electronic record keeping systems, is the sum of all RCS items approved by NARA for the disposition of Agency records arranged in a hierarchical scheme. The Agency File Plan is under strict configuration management. However, as new record series are identified and dispositions authorized, the file plan will be amended accordingly. We have included a draft copy of the Agency File Plan. We are assigning one disposition with each 3<sup>rd</sup> level tag prior to the disposition of any records associated with the file plan. The final plan will be forwarded to NARA for review; a current draft is attached (attachment #23).

(U//~~FOUO~~) The relationship between the Agency File Plan and PERM is a close one. PERM is an application that allows for classification, categorization, and filing of records originated or received at an employee's workstation. PERM incorporates Federal regulations as well as directives and business rules established by the Intelligence Community and CIA. In the classification arena, the instructions and guidance can be found in the Agency Classification Guide, Intelligence Community Classification and Control Marking Register and Executive Order 12958.

For records management, the rules are incorporated into the Agency File Plan that follows the Code of Federal Regulations, Title V for FOIA and Privacy Act, General and Agency records schedules, et. al.

(U//~~FOUO~~) The enclosed document "Agency File Plan and PERM Overview and Demonstration" (attachment #24), dated 22 November 2000, illustrates the strong relationship between the Agency File Plan and PERM.

• Recommendation II/4:

(U) Ensure that adequate indexes are created where necessary and that staff who need to use them have familiarity with them.

CIA Response:

(U//~~FOUO~~) One of the functions of our component IMOs is to ensure that their component maintains the indices it needs to find records, and that these indexes are effective, accurate, and properly preserved.

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In addition, both the Agency information technology governance process and the ERKS certification requirements (attachment #25) ensure that records systems will develop, maintain, and preserve effective finding aids.

• Recommendation II/5:

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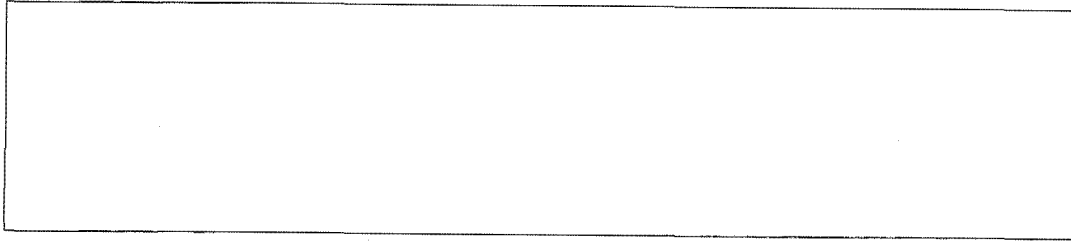
CIA Response:

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• Recommendation II/6:

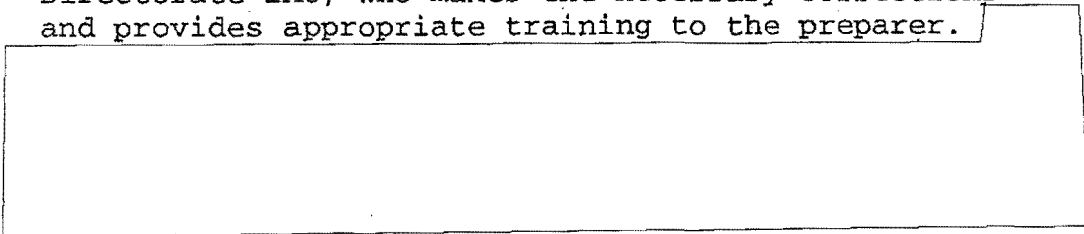
(U) Inspect new accessions retired to the ARC to ensure that records are scheduled properly and to identify any preservation problems and needs, including compliance with CIA regulations concerning the use of acid-free folders for permanent series.

(U) This review can either be conducted by component IMOs prior to shipment of records or by ARC staff as part of the accessioning process.

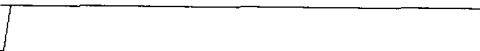
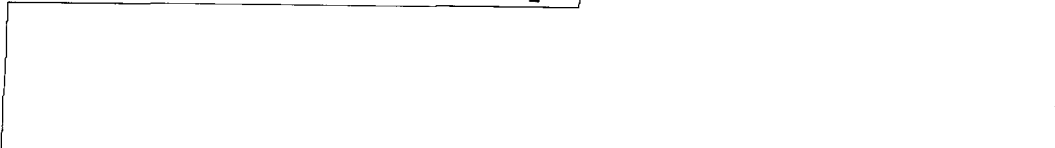
CIA Response:

(U//~~FOUO~~) The "Permanent Retirement Job Quality Control/Preservation Checklist" used at the ARC for accessioning both temporary and permanent records has been renamed the "Permanent/Temporary Job Quality Control/Preservation Checklist" (attachment #26). The checklist is used to verify both temporary and permanent deposits to the ARC. Directorate and component IMOs verify the RCS on each job (accession) prior to its transfer to the ARC. ARC personnel verify the adequacy of the shelflist, the preparation of the accession, including compliance with appropriate preservation techniques, among others. Deficiencies with an accession are corrected by ARC personnel. If the deficiencies cannot be resolved at the ARC, the job (accession) is returned to the Directorate IMO, who makes the necessary corrections and provides appropriate training to the preparer.

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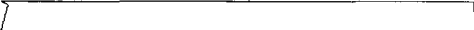
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and vital records inventory.   


- Recommendation II/9:

(U) Consider conducting a mock emergency preparedness drill to ensure that, in an emergency, records are easily retrievable, all equipment needed to read the records is available, and that system documentation is adequate to operate any system that contains vital records.

CIA Response:

(U//~~FOUO~~) The Agency validated its existing vital and disaster recovery procedures. 

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- Recommendation III/1:

(U) Review full text and skeleton schedules for declassification; provide full text schedules to NARA even if portions are security classified.

CIA Response:

(U//~~FOUO~~) You have asked us to review for declassification the full text of the Agency records control schedule. This review should be completed by the end of calendar year 2002.

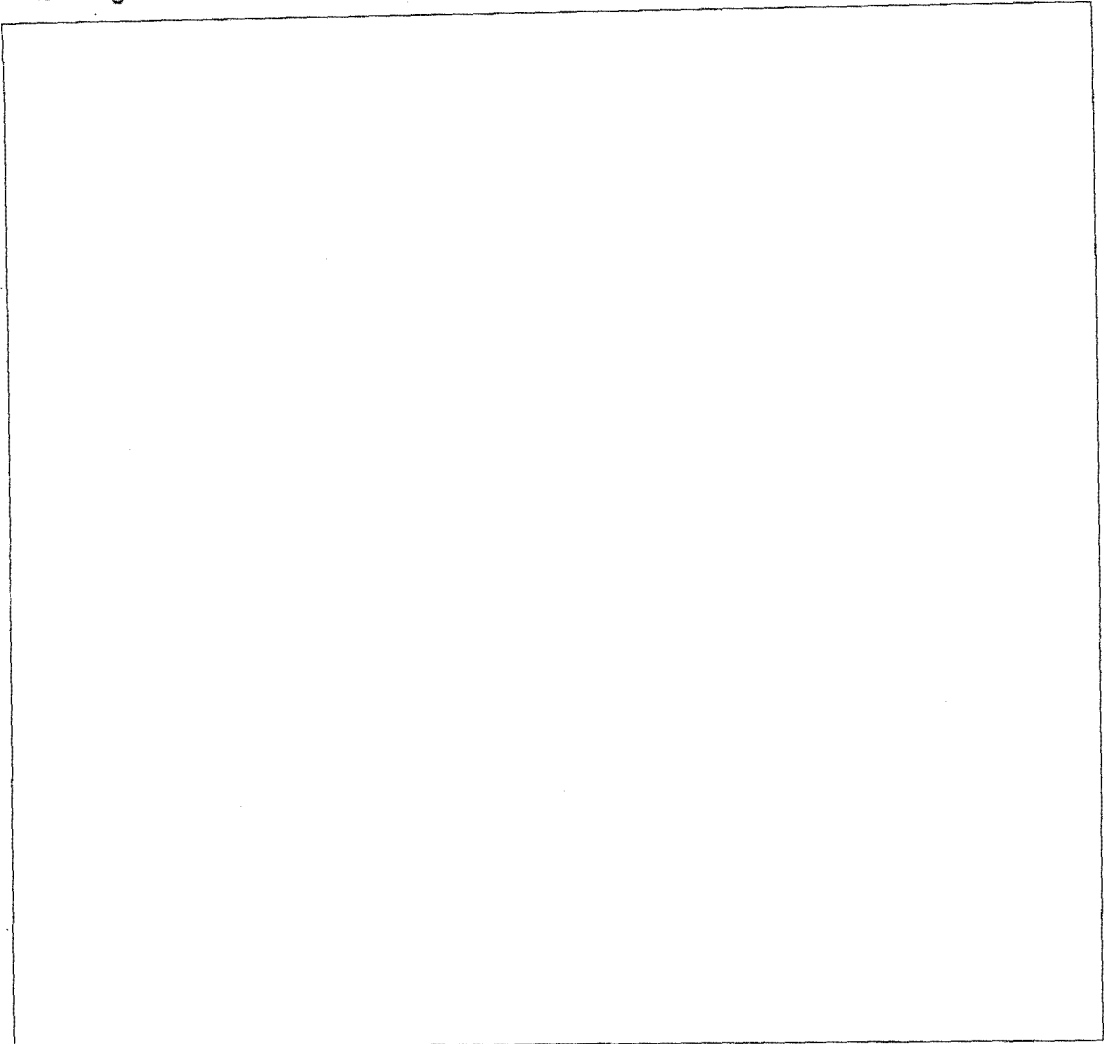
- Recommendation III/2:

(U) Submit schedules for all unscheduled series, including series where records are now maintained electronically, particularly permanent series where paper documents are no longer printed out and filed.

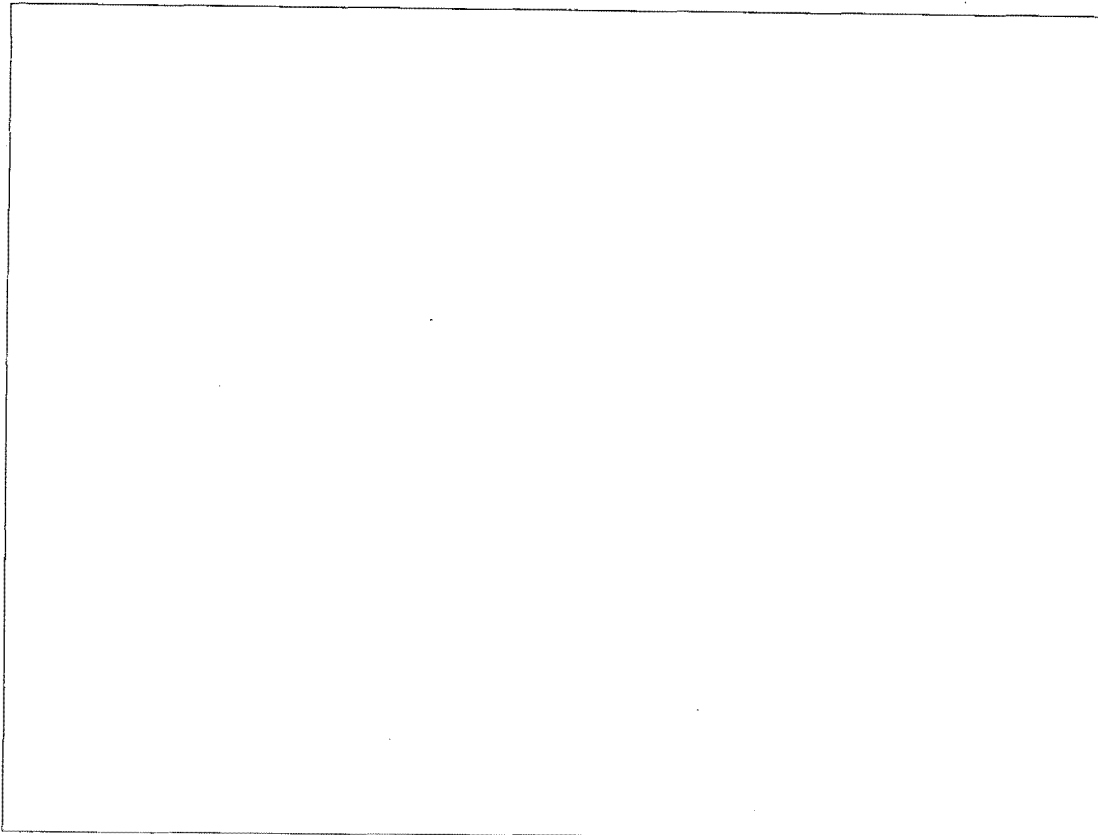
CIA Response:

(U//~~FOUO~~) In keeping with NARA's recommendation, if unscheduled series are found, they will be submitted to NARA for a disposition determination. The Electronic Record Keeping System process (ERKS) will ensure that all electronic record keeping systems at CIA are compliant with federal record keeping standards. The maintenance of specific files series, mentioned in your 23 October 2001 letter and in the third chapter of the NARA evaluation, are addressed below. Where specific records schedule items are cited, we have included those schedules. If there are other systems or series that need addressing, please bring them to our attention.

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- Recommendation III/3:

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

CIA Response:

(U//~~FOUO~~) A copy of the CIO/IMS Corporate Records Management Training Policy and Plan<sup>1</sup> has been included in the notebook (attachment #31).

(U//~~FOUO~~) The CBT records management training provides guidance on the proper creation, preservation, and disposition of records. Our response to recommendation I/3 includes more details about the training provided by CIA IMOs (please see attachments #7-#12).

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<sup>1</sup> The CIO/IMS Corporate Records Management Training Policy and Plan was previously referred to as the Corporate IM Training and/or Communication Plan in previous reports and the Milestones Matrix.

(U//~~FOUO~~) An 18-month roll-out plan for PERM (attachment #32) was presented to the Agency Governance Board in March 2002. Also included are PERM training materials (attachment #33) that address user responsibilities to document official activities.

• Recommendation III/4:

(U) Work with NARA in the development of a revised schedule for DO operational project files; use this schedule as the basis for written guidance that is provided to those who review and/or process older operational files.

CIA Response:

(U//~~FOUO~~) Completion of this recommendation will require Agency-NARA discussions about the draft SF 115 for the Operational Activity (OPACT) Files (attachment #34). We have attached proposed language for the SF 115 (attachment #34).

• Recommendation III/5a:

(U) Ensure that all staff that create or maintain records are familiar with and properly apply existing agency guidance pertaining to what is a record and the record status of working files,

CIA Response:

(U//~~FOUO~~) We have enclosed in the notebook the CIO/IMS Corporate IM Plan and Policy (attachment #31). You will note that the policy requires that IM training be presented in each Agency component annually.

(U//~~FOUO~~) Please refer to CIA responses to recommendations I/3 and III/3 and exemplars in the notebook (attachments #7-#12) for training on records management. We have also enclosed training materials for PERM (attachment #33). A description of working

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files is included in the Employee Bulletin (attachment #29) and also addressed in the CBT (attachment #6).

(U//~~FOUO~~) The CBT, currently in redesign, will cover all aspects of the Agency's records management program as well as the responsibilities of employees to originate, maintain, and preserve records. This uniform instruction will be delivered to the desktop of every Agency officer (staff and contract). Completion of the CBT program and associated test will be mandatory for every officer, annually. The CBT will form the nucleus of our annual records training, augmented by IMO-presented instruction on an as needed basis.

- **Recommendation III/5b:**

(U) Modify the description of working files included in the agency schedules so it incorporates the guidance in this regulation.

**CIA Response:**

(U//~~FOUO~~) Attached is a signed SF 115 (attachment #35) for CIA working files, the language for which has been coordinated with your agency. The treatment and disposition of working files will be included in the CBT and component instruction delivered by the IMO.

- **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 NC1-263-85-1, Item 1e.

**CIA Response:**

(U//~~FOUO~~) Chronological files used as finding aids (indices) are retained for as long as the records to which they provide access. This is in keeping with NC1-263-85-1, Item 1e. and requisite items in the

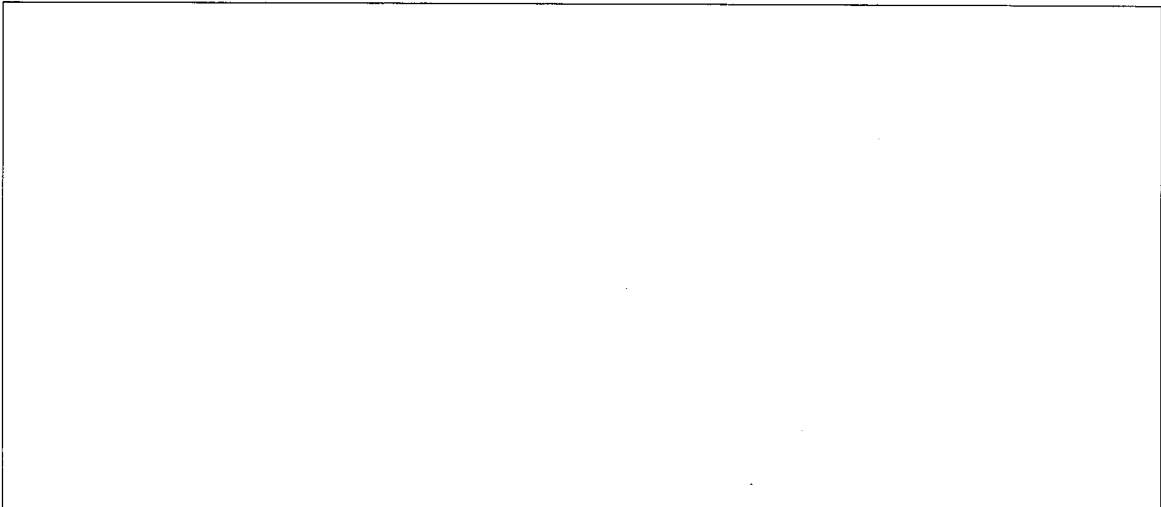
General Records Schedules. The following addresses questions in your 23 October 2001 letter.

(U//~~FOUO~~) Our Corporate IM Training Plan/Policy (attachment #31) and the CBT (expected for deployment in CY2002) all are parts of our communication plan to ensure that all employees (regardless of position or rank) understand their record keeping responsibilities, including the proper use and management of chronological files. Our communications plan is augmented by the issuance of notices, bulletins, and reminders to the Agency population periodically throughout the year.

(U//~~FOUO~~) The draft Employee Bulletin (attachment #17) will satisfy the requirements set forth in this recommendation. We will issue it upon your review.

(U//~~FOUO~~) With respect to component guidance, IMOs, based upon their assessment of the sufficiency of component records procedures, provide tailored briefings to employees to explain any deficiencies and detail the actions that need to be taken to avoid them in the future. Exemplars of that training have been included in the notebook (attachments #7-#12 and #33), along with a copy of the current CBT (attachment #6).

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- Recommendation III/7:

(U) Continue the project to apply correct schedule items to ARC accessions improperly retired as permanent; include NARA review as part of the process.

CIA Response:

(U//~~FOUO~~) As stated in recommendation II/6 above, the "Permanent/Temporary Job Quality Control/Preservation Checklist" (attachment # 26) is currently used at the ARC for accessioning both temporary and permanent records. Quality control of job contents is performed by the ARC on all non-restricted records; restricted records are reviewed by the Directorate IMOs.

(U//~~FOUO~~) The Agency Archival Review Team (AART), [redacted]

[redacted] reviews and determines the appropriate action in those cases when the disposition of retired records is challenged. For example, the AART will review recommendations that temporary records due for destruction be kept longer. As necessary, the AART will recommend consultation with NARA and/or the submission of a SF 115 (to NARA) covering the records in question.

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- Recommendation III/8:

(U) Work with NARA to develop transfer instructions for permanent records that reduce the age at which CIA records are typically accessioned by NARA, provide for the transfer of entire series (or chronological segments thereof), and take into account CIA plans to review files for declassification electronically.

CIA Response:

(U//~~FOUO~~) We acknowledge NARA's interest in the transfer of permanent records and will transfer them when they have no further business value. Moreover, we believe that the 25 year declassification program will assist us to identify records that no longer have a business use and can be transferred to NARA. In



addition, where classification and security concerns are at issue, an IC affiliated archive may meet the needs of both NARA and the Agency. In the shorter term, we are proceeding in accordance with the process outlined in the memorandum, dated 19 March 2001, to the Executive and Deputy Directors from the Director of Information Management entitled "Identification of Agency Permanent 50-year old Records for Transfer to the National Archives." We plan to identify those records for transfer to you by the end of calendar year 2002.

- **Recommendation III/9:**

(U) Work with NARA to develop a timetable for the transfer of specific files to the National Archives, with the goal of transferring by the year 2003 most permanent files cut-off prior to 1961.

**CIA Response:**

(U//~~FOUO~~) We have enclosed the requested items Appendix C, "Form Letter for Submitting Response to This Request" (attachment # 37) and Appendix D, "Agency Transfer Plan" (attachment #38).

- **Recommendation IV/1:**

(U) Comply with NARA guidance contained in 36 CFR 1234 when electronic systems are developed, maintained, or upgraded. Of particular importance is the need to include migration strategies as part of the life cycle planning for electronic systems design and implementation.

**CIA Response:**

(U//~~FOUO~~) A copy of the Electronic Record Keeping System (ERKS) Requirements for Information Management System Certification is included in the notebook (attachment #25). This document provides a detailed discussion about the ERKS certification process and the requirement for a migration strategy for electronic documents. See ERKS manual, pages 5-11.

(U//~~FOUO~~) Systems certified by the ERKS process are recorded in the Agency Catalog of Databases (CATDB). Each system will be validated against the process every five years or whenever changes are made to the system. The ERKS process involves writing an Information Management plan that addresses how records are to be migrated when records retention is likely to extend beyond the system life.

- **Recommendation IV/2b:**

(U) Ensure that SMART has the capability to retrieve special media records in the ARC.

**CIA Response:**

(U//~~FOUO~~) Enclosed is a copy of the AIRRS User's Guide (attachment #39), as you requested. The AIRRS system has been replaced by SMART, which inherited all of AIRRS' functionality. We have also attached the SMART User's Guide (attachment #40).

- **Recommendation IV/3:**

(U) Disseminate the Agency e-mail regulation to all Agency staff who use e-mail and monitor its implementation. Update this issuance as NARA develops new guidance concerning the maintenance and disposition of e-mail.

**CIA Response:**

(U//~~FOUO~~) In accordance with your request, we have enclosed

[redacted] draft Employee Bulletin entitled "Records Responsibilities of Employees and Managers" (attachment #17) that we will disseminate after your review. In addition, examples of records management training materials and a copy of our Computer Based Training on records and classification management are contained in the response to recommendation I/3 (attachments #6-12).

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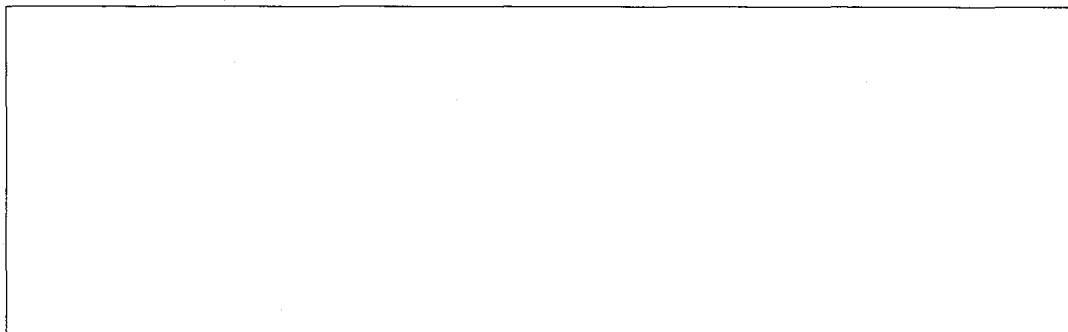
- Recommendation IV/4:

(U) Complete the centralized catalog project so the Agency will have a comprehensive, Agency-wide inventory of electronic records. After the centralized catalog is completed, implement measures to keep it current as additional systems are developed.

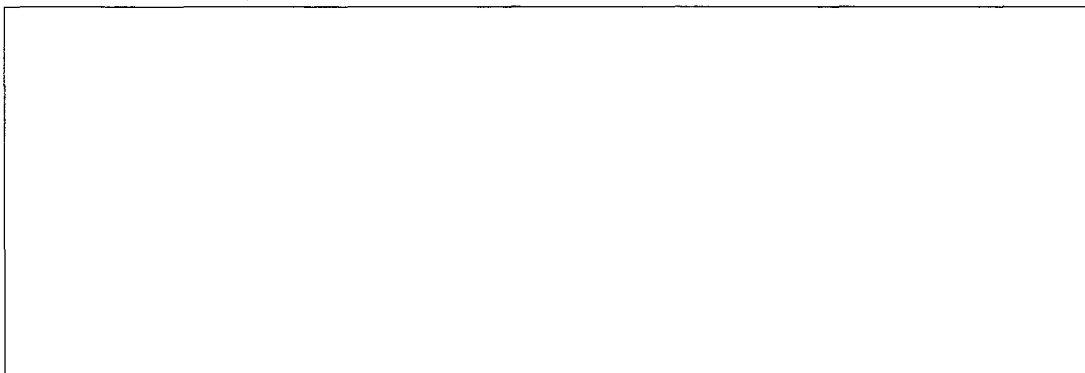
CIA Response:

(U//~~FOUO~~) A new version of the Catalog of Databases (CATDB) was deployed on 21 February 2002 to the Agency directorates, DCI area, and MSO offices. CATDB provides an on-line, directorate/component specific inventory of databases.

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- Recommendation IV/5:

(U) Using the centralized catalog data as well as pre-existing inventories and lists, work with NARA to initiate and carry out a project to ensure that all CIA electronic record systems are eventually covered by NARA-approved schedules.

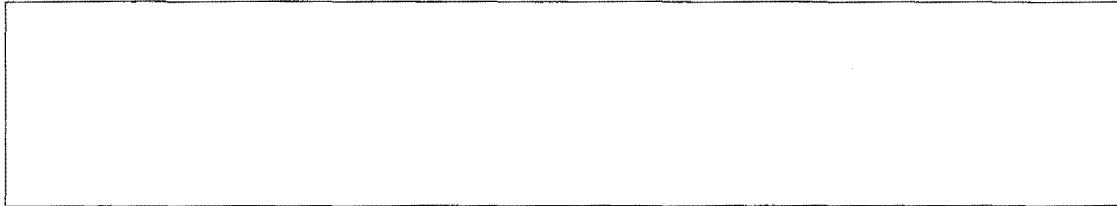
(U) This effort should begin as soon as possible, using existing inventory information, and should encompass the review and coordination with NARA of housekeeping systems to determine which are covered by the GRS and which are not. Develop schedules for non-GRS records, beginning with those that pertain to CIA's core missions and are the most likely to be appraised as permanent.

CIA Response:

(U//~~FOUO~~) We are unaware of records, maintained in any system, that are not already scheduled in an existing Agency-approved RCS and GRS-20 (attachment #45). The Agency will seek disposition authority for any electronic system in the event that the (electronic) records are not or cannot be output to an approved electronic recordkeeping system, paper, or microform for recordkeeping purposes.

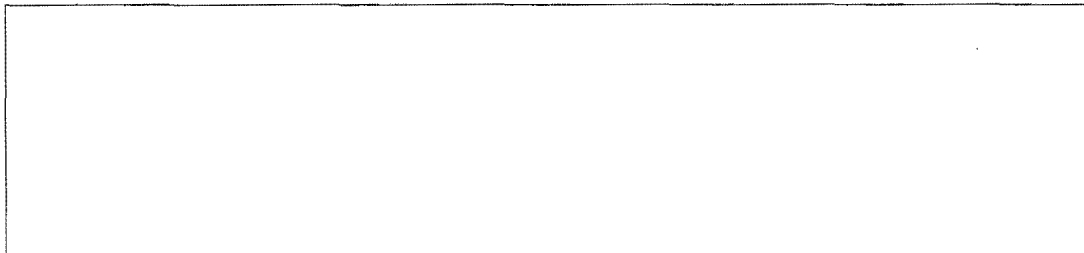
• Recommendation V/1:

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CIA Response:

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• Recommendation VI/1:

(U) Issue specific guidance concerning the creation, maintenance, and disposition of non-textual records that incorporates NARA guidance. This can be done either through a separate issuance or by incorporating

guidance into the appropriate records management regulation

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CIA Response:

(U//~~FOUO~~) We have reviewed the February 28, 2001, Employee Bulletin (EB) entitled "Non-Textual Records Preservation" (attachment #29). It includes a reference to each of the audiovisual records types cited in 36 CFR 1228.266 and NARA's publication "Managing Audiovisual Records (Second Edition). However, we have modified the EB to include specific reference to the CFR and NARA publications on the preservation of audiovisual records. The changes in the EB are underlined, and we will re-issue it subsequent to your review (attachment #46).

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- Recommendation VI/2:

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

CIA Response:(U//~~FOUO~~)

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We have included the Employee Bulletin entitled "Non-Textual Records Preservation" with the CFR citation on preservation of permanent and unscheduled video recordings (attachment #46). IMOs have and will continue to take NARA and university courses that provide instruction on the preservation of all record types. Both the ARC and the component IMOs are sensitive to preservation issues for all record types, including video recordings. IMOs routinely review how their components handle and store video recordings.

- Recommendation VI/3:

(U) Inventory non-textual records and develop schedules for all unscheduled series as well as

specific schedule items for certain major collections now covered by generic authorities as identified in this report

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CIA Response:

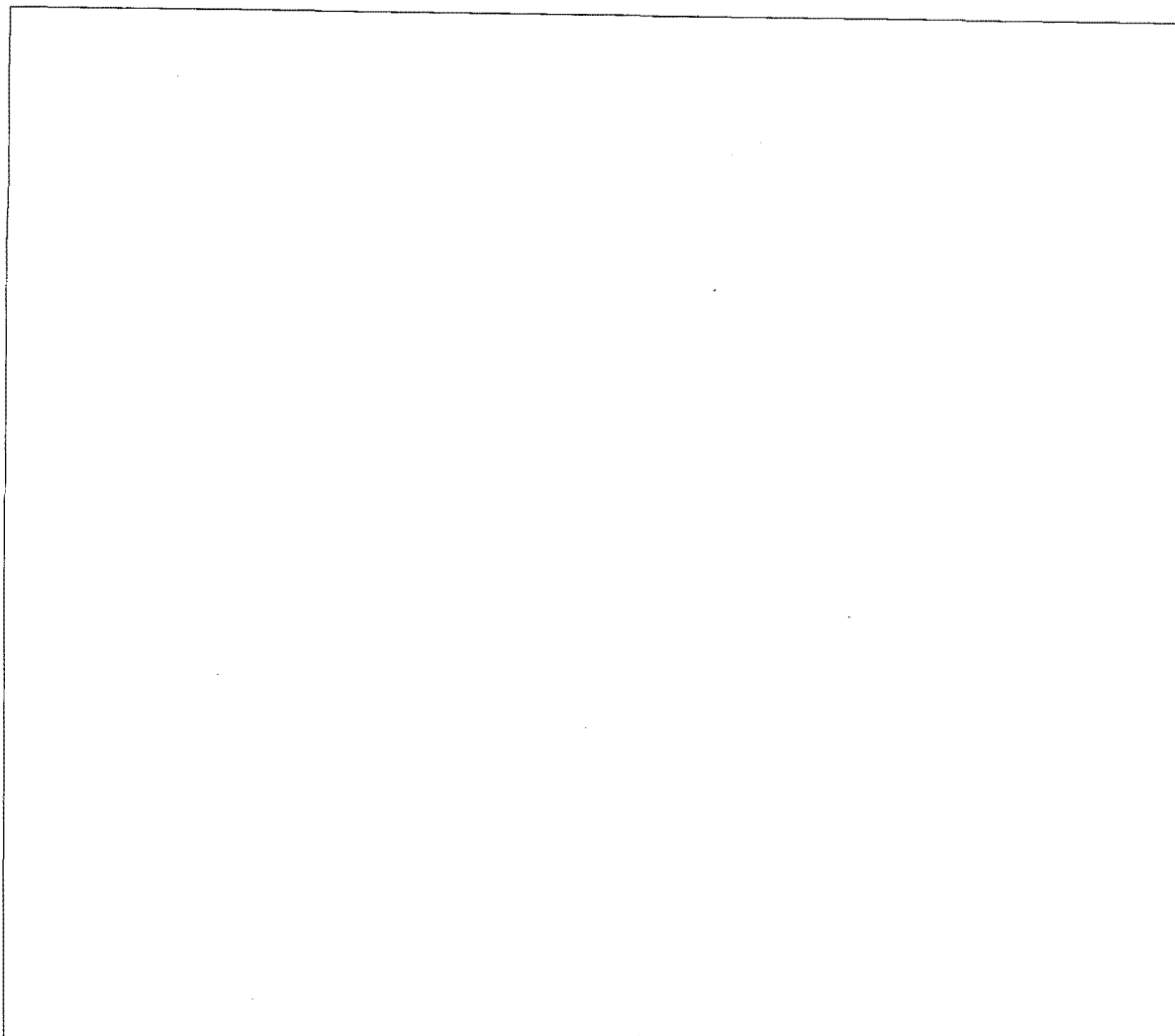
(U//~~FOUO~~) We believe that the General Records Schedule and the NARA approved Agency specific schedules cover our non-textual records,

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(U//~~FOUO~~) Per your 17 October 2000 letter, we note NARA's concern about submitting a records control schedule without first conducting an inventory. The Agency File Plan incorporates existing records control schedules in a taxonomic view that supports our records management program. Any new or unscheduled records series will be documented and submitted to NARA, via SF 115, for a disposition authority. The file plan will be amended, thereafter, to include the new series. Regarding comments made in your initial report about specific records collections:

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• Recommendation VI/4a:

(U) Modify schedules to accelerate the transfer of non-textual records to NARA custody.

CIA Response:

(U//~~FOUO~~) In line with our response to recommendation III/8 above, we continue to examine ways to make permanent textual and non-textual transfers to NARA custody. In addition, we believe that our 25-year declassification program will allow us to identify collections that can be transferred to NARA on an accelerated basis.





- Recommendation VI/4b:

(U) Immediately transfer the OSS map collection to NARA.

CIA Response:

(U//~~FOUO~~) In response to the nine items described in your letter dated 12 March 2001 and designated "Records Scheduled as Permanent on the OSS Schedules but not Transferred," we are able to provide additional information regarding the disposition of four of the items. We were unable, however, to locate the remaining five items. Our findings for each of the nine items are summarized below.

(U//~~FOUO~~) Item 8, CIA Job 57-93 - Organizational Charts used by the OSS and SSU for planning of a central intelligence service. We have located these records. While technically these are OSS records, their content deals with the organization and operations of the Counterintelligence Group (CIG)--the organization that succeeded OSS. We plan to review these records prior to transferring them to NARA to determine if any sensitive CIA equities are involved in this material.

(U//~~FOUO~~) Item 82, OSS Research and Development Production Records. The Agency's Record Center has no record of CIA Job 78-3760. An Accession Job number was not provided by NARA.

(U//~~FOUO~~) Item 83, OSS Map Records. The Form 258 for Accession Job Number NN3-226-85-2 makes no reference to Item 83. No CIA Job Number was provided.

(U//~~FOUO~~) Item 98, General John Magruder--Record Private Papers. The Form 258 for Accession Job Number NN3-226-85-2 makes no reference to Item 98. No CIA Job Number was provided.

(U//~~FOUO~~) Item 102, Miscellaneous Top Secret Reports File. The Agency's Record Center has no record of Job Number 60-749. The Form 258 for Accession Job Number NN3-226-85-2 makes no reference to Item 102.

(U//~~FOUO~~) Item 106, CIA Job 61-949 -- Strategic Services Unit Liaison Control of Records. These records were transferred to NARA under CIA Job 80-168. Item 106 records were incorporated into box 4 of this job.

(U//~~FOUO~~) Item 115, OSS Miscellaneous Records. The form 258 for Accession Job NN3-226-85-2 makes no reference to Item 115. No CIA Job Number was provided.

(U//~~FOUO~~) Item 122, CIA Job 62-S-460 -- Washington OSS Communications Records. Agency records indicate that these records were destroyed in May 1980. Attempts to reconstruct the events leading to their disposition proved inconclusive because information incidental to the destruction records is retained for only five years.

(U//~~FOUO~~) Item 125, CIA Job 65-S-72 -- Washington OSS Communications records. The Agency transferred these records to the National Security Agency for disposition on 25 May 1997. During a comprehensive review of OSS records in 1997, Agency file reviewers determined that this collection was mislabeled as OSS material. They concluded that these records were actually part of the VENONA collection of intercepts acquired from NSA in the 1950s.

• Recommendation VI/5:

(U) Develop and implement a plan to preserve non-textual 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 non-textual records, copying permanent records maintained on obsolete media to contemporary formats, and the review of the ARC's non-textual holdings to identify accessions in need of preservation action. Particular attention should be paid to locating non-textual records contained in accessions retired to the ARC prior to 1978.

CIA Response:

(b)(3)

(U//~~FOUO~~) The notebook includes copies of [REDACTED]

[REDACTED] the February 28, 2001, Employee Bulletin (EB) entitled "Non-Textual Records Preservation" (attachment #29), that detail the steps and activities associated with preservation and disposition of Agency records.

(U//~~FOUO~~) There is no report, per se, that is generated or required documenting improper preservation of records transmitted to the ARC. Rather, corrective action is taken directly by ARC personnel (using the preservation checklist) or returned to the component IMO for remediation. Except for fungus on microfiche, we are unaware of any damage to records maintained at the ARC. The damaged microfiche has been isolated from other film products. Once copied to an archival medium, the damaged microfiche will be destroyed.

We believe that the ARC renovation meets NARA regulations for a records center and invite you to inspect the facility.

(b)(3)



Washington, D.C. 20540

4/27/03  
Report has  
nothing on the  
major issues

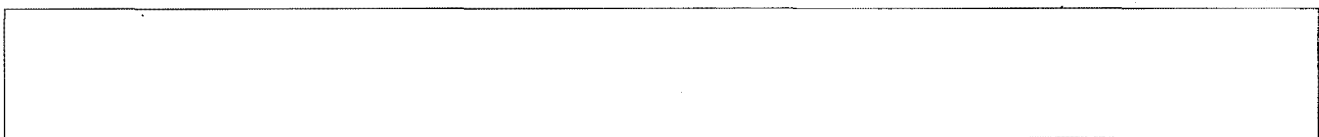
15 December 2003

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) We believe we have taken the requested actions to close out ten 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: I/1, I/3, II/1, II/1a, II/4, II/7, III/7, IV/1, IV/3, and IV/4. In addition, the progress report also addresses your requests for additional material.

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



(U) Finally, I would like to meet with you to discuss the more difficult problems that remain. There have been a number of meetings and useful discussions between our respective staffs. These discussions have sharpened our understanding of some of the issues, but have not led to their resolution.

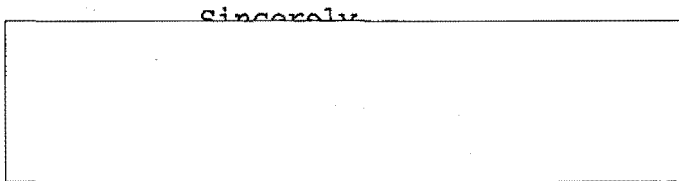
(b)(3)

(U//~~FOUO~~) Please call me [redacted] or [redacted] at your convenience after you have reviewed our progress report.

(b)(3)

(b)(3)

(b)(3)  
(b)(6)



Director, Information Management Services  
Chief Information Officer

Enclosure

UNCLASSIFIED//~~FOUO~~



15 December 2003

**Progress Report on the NARA Evaluation  
of CIA Record Keeping Practices**

UNCLASSIFIED//~~FOUO~~

**Table of Contents**

**(U) Overall Records Management**

- Recommendation I/1
- Recommendation I/3

**(U) Records Creation and Maintenance**

- Recommendation II/1
- Recommendation II/1a
- Recommendation II/4
- Recommendation II/7

**(U) Records Scheduling and Disposition**

- Recommendation III/7

**(U) Agency-Wide Electronic Records**

- Recommendation IV/1
- Recommendation IV/3
- Recommendation IV/4

**(U) Attachments**

(b)(3)

2. *Employee Bulletin*: "Records Responsibilities of CIA Employees and Managers"

(b)(3)

3. *Memorandum*: "Records Responsibilities of Senior Officials of the Central Intelligence Agency"

(b)(3)

5. *What's News at CIA*: "Records Responsibilities of Employees and Managers"

6. *Employee Bulletin*: "Non-Textual Records Preservation"

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Recommendation I/1:

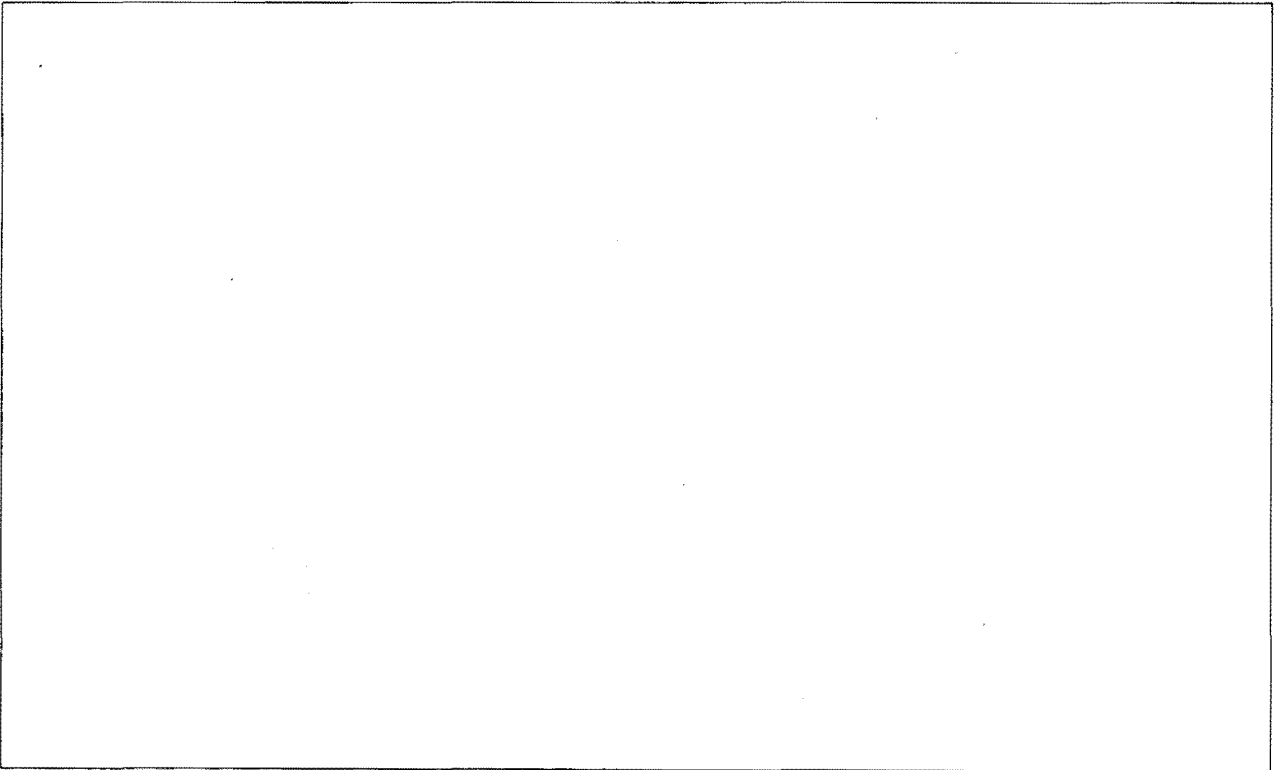
(U) Ensure that there are sufficient IMOs in both OIT and the Directorates to implement the recommendations in this report.

(U) Review workloads and staffing levels to determine whether or not IMOs should be assigned to organizations where day-to-day records management duties are currently handled by POCs.

Action Items Identified from Latest Correspondence:

- (U) Describe how the fifth directorate is being provided IMO support.
- (U) Implement the Information Management Checklist, and describe how recommendation implementation will be tracked and follow-up made.

CIA Response:



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

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**Recommendation I/3:**

(U) Develop a one-day course dealing with record keeping responsibilities of program staff including the application of approved records schedules to their files and basic records concepts such as distinguishing records from non-record materials.

**Action Items Identified from Latest Correspondence:**

- (U) Contact David Langbart to review the second generation CBT.

**CIA Response:**

(U//~~FOUO~~) As requested in your 17 April 2003 reply, an appointment was set up with David Langbart, and the second generation CBT was reviewed on 15 July 2003.



**Recommendation II/1a:**

(U) E-mail communications that meet the definition of records should be retained in a record keeping system.

**Action Items Identified from Latest Correspondence:**

- (U) Modify the Employee Bulletin on "Records Responsibilities of CIA Employees and Managers" as noted.
- (U) Add the following question to the Information Management Checklist:
  - Has the Agency's email policy been distributed to all employees in the directorate/component/office?

**CIA Response:**

(U//~~FOUO~~) The Employee Bulletin on "Records Responsibilities of CIA Employees and Managers" was modified and issued in accordance with your 17 April 2003 reply (attachment #2).

(U//~~FOUO~~) As noted in our response to Recommendation I/1, the IM Survey has replaced the IM Checklist. Nonetheless, the question you provided in your 17 April 2003 reply has been added to the next iteration of the IM Survey scheduled for FY 2004.

**Recommendation II/4:**

(U) Ensure that adequate indexes are created where necessary and that staff who need to use them have familiarity with them.

**Action Items Identified from Latest Correspondence:**

- (U) Finalize and implement the Information Management Checklist.

**CIA Response:**

(U//FOUO) As noted in our response to Recommendation I/1, the IM Checklist was replaced by the IM Survey, which was implemented January thru March 2003. Therefore, all recommended changes to the IM Checklist have been integrated into the next iteration of the IM Survey scheduled for FY 2004.

**Recommendation IV/3:**

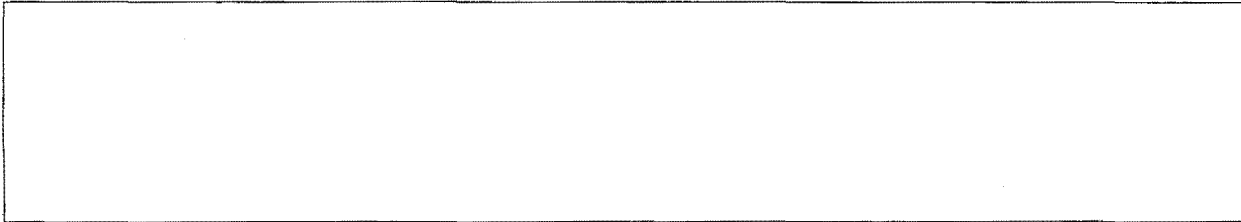
(U) Disseminate the Agency e-mail regulation to all Agency staff who use e-mail and monitor its implementation. Update this issuance as NARA develops new guidance concerning the maintenance and disposition of e-mail.

**Action Items Identified from Latest Correspondence:**

- (U) Describe the steps CIA is taking to monitor implementation of the Agency's email guidance and regulations.
- (U) Modify the Employee Bulletin on "Records Responsibilities of CIA Employees and Managers" as noted.

**CIA Response:**

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



(U//~~FOUO~~) As noted above, the Employee Bulletin on "Records Responsibilities of CIA Employees and Managers" (attachment #2) has been modified and issued in accordance with your 17 April 2003 reply.

Recommendation IV/4:

(U) Complete the centralized catalog project so the Agency will have a comprehensive, Agency-wide inventory of electronic records. After the centralized catalog is completed, implement measures to keep it current as additional systems are developed.

Action Items Identified from Latest Correspondence:

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(b)(5)

CIA Response:

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OPR: CIO/IMS EB NUMBER: 002-03  
1 October 2003

## RECORDS RESPONSIBILITIES OF CIA EMPLOYEES AND MANAGERS

1. (U) This Employee Bulletin is being issued to remind all CIA employees of their responsibilities under 36 CFR § 1220 – 1236 to create, maintain and preserve records of agency organization, functions, policies, decisions, procedures, and essential transactions.

2. (U) Every CIA employee produces records on a daily basis. Not all records are treated the same, however. Each record type has a specific business use and, hence, a specific retention period that may be as brief as “destroy when no longer needed” or as enduring as those designated “permanent” that, in time, will be transferred to the National Archives. All records have a specific retention period that must be approved (scheduled) by NARA. All records shall be maintained, inviolate and readable, for the specified retention period. Any unauthorized destruction of records deprives the Agency of accountability, history, continuity, and legal defense AND may represent a criminal offense.

3. (U) Records may be produced on any medium and/or communicated physically, visually, verbally, or electronically. Memoranda of telephone conversations, discussions, and meetings, e-mail messages, memoranda, contents of or output from a database, instant messages, presentations, chat boards, audio and video recordings, correspondence, cables, intelligence reports, and speeches may be records. Records might be arranged as subject files, country files, chronological files, project files, or by other means. The statutory definition of a record is as follows:

All books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the US Government under Federal law or in connection with the transaction of public business, preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, function, policies, decisions, procedures, operations or other activities of the Government or, because of the informational value of the data in them. (44 US Code 3301)

4. (U) All employees, regardless of rank or position, have an official responsibility to adequately and properly document and maintain, in appropriate files, records produced or received in the component to which he or she is assigned. All records must be maintained in an approved record keeping system, which can be paper or electronic.

(b)(3) 5. (U) Please reference [redacted] which contains the policies and procedures associated with the Agency records management program and each employee's responsibility under that program. In addition, [redacted] stipulates that (b)(3) official telephone conversations, meetings, and other conversations should be documented in Memorandums to the File. Employees must prepare this documentation

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for all conversations in which Agency business is conducted. The maintenance of chronologies in an office is a common Agency practice. Chronologies are records, and in some cases, may be the only official record of the office activities. Chronologies that are exact copies of office records held in an approved record keeping system are reference and can be discarded annually or when no longer needed. Every employee maintains what he/she calls "working files." Often, these files are duplicates of the office record copy. However, any working paper or draft that was circulated outside the unit of origin for comment or action and contains substantive information not captured in the final document must be kept (along with the final) in the office record keeping system. E-mail messages may also constitute records.

(b)(3)

[redacted]

including the proper capture and maintenance of e-mail. If there are questions regarding retention and disposition of an office chronology, a collection of working files, e-mail or other records, the custodian must contact the component or Directorate Information Management Officer (IMO) for guidance.

6. (U) There are no presumptions that work products, finished or in draft, or the documentation of decisions, policies, and transactions (all records) produced by a CIA employee are personal. Such work was produced for and remains the property of the Agency, and represents a Federal record. However, employee-originated materials of a strictly personal nature (despite using Government facilities) that do not relate to or have an effect upon Agency business are excluded from the definition of Federal records. This material must be kept separate from the Agency records. Personal papers, prior to being removed from CIA or other Federal property, must be reviewed by the Directorate Information Release Officer (IRO). See the Information and Records Management Database (AGNS04) and refer to 36 CFR § 1222.36(c) for additional guidance on personal papers.

- 7. (U) Prior to leaving an assignment or the Agency, each employee shall ensure that:
  - o the records he/she received or originated are in an approved record keeping system;
  - o all other referential information is disposed of in accordance with approved disposition schedules;
  - o no official materials, including copies, whether classified or not, are removed from Agency facilities without authorization;
  - o the appropriate Directorate IRO has reviewed (for release) all information of a purely personal nature, not associated with official Agency activities, before removal from CIA or other government facilities.

(b)(3)

8. (U) If you have any questions regarding the retention of federal records, please consult with your Directorate (MSO/IMO [redacted] DI/IMO - [redacted] DO/IMO [redacted] DST/IMO [redacted] DCI Area/IMO - [redacted] or component Information Management Officer.

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CIO/IMS 0170-03  
12 December 2003

MEMORANDUM FOR: Director of Central Intelligence  
Deputy Director of Central Intelligence  
Deputy Director of Central Intelligence  
for Community Management  
Executive Director  
Deputy Director for Intelligence  
Deputy Director for Operations  
Deputy Director for Science and Technology  
Director of Security  
Chief Financial Officer  
Chief, Global Support  
Chief Human Resources Officer  
Chief Information Officer  
Chairman, National Intelligence Council  
General Counsel  
Inspector General  
Associate Director of Central Intelligence  
for Military Support  
Deputy Executive Director  
Director of Congressional Affairs  
Director of Public Affairs

(b)(3)

FROM:

[REDACTED]  
Director of Information Management  
Services, CIO

SUBJECT: (U) Records Responsibilities of Senior Officials  
of the Central Intelligence Agency

1. (U) The National Archives and Records Administration (NARA) requires us to periodically remind all employees of certain records management responsibilities.

2. (U) Senior officials of the Agency are responsible for ensuring that adequate and proper documentation of the organization, functions, policies, decisions, procedures, activities, and essential transactions of the Agency is created and maintained, and that final disposition is handled properly, in accordance with applicable laws, regulations, and approved records control schedules.

3. (U//~~FOUO~~) Agency employees originate or receive almost every product or communiqué via computer and much of the Agency business is transacted through email, inside and outside the CIA.

UNCLASSIFIED//~~FOUO~~

Subject: (U) Records Responsibilities of Senior Officials of  
the Central Intelligence Agency

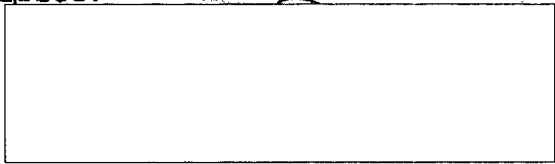
Accordingly, these records should be put into an approved record keeping system, for example, the Proactive Electronic Records Management System (PERM). Alternatively, email records may be printed and put in a paper record keeping system.

4. (U//~~FOUO~~) Each Directorate has a senior Information Management Officer (IMO) whose charge is to assist you and your staff on issues regarding records management and the appropriate classification level to apply to these records. As needed, the Directorate IMO, or one of the component IMOs in your area, can also provide handouts and/or a brief presentation about proper records management techniques. We also reminded employees of their record keeping responsibilities in a recently issued Employee Bulletin, Number 0002-03, dated 2 October 2003.

5. (U//~~FOUO~~) Please contact your Directorate IMO or the Chief, Records and Classification Management Group/IMS/CIO  for any assistance that we may provide to facilitate recordkeeping in your office.

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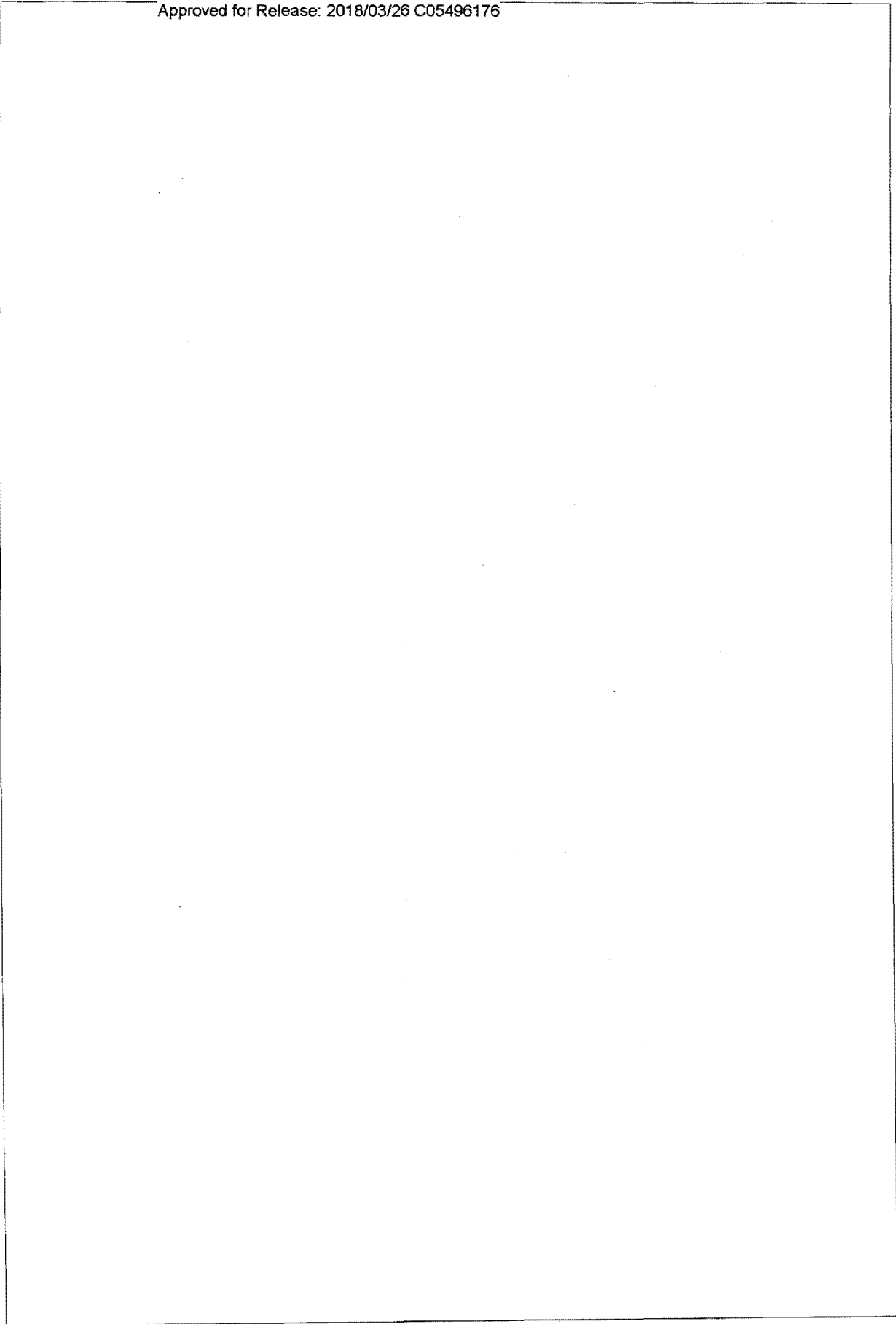
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UNCLASSIFIED//~~ATUO~~

February 5, 2001



No. 835

### (U//~~ATUO~~) Records Responsibilities of Employees and Managers

(U//~~ATUO~~) The National Archives and Records Administration requires us to periodically remind employees, particularly during a change in Administration, of certain records management responsibilities.

(U//~~ATUO~~) **Each employee**, regardless of rank or position, has an official responsibility to **create and maintain** the records, electronic and non- electronic, needed to document the activities of the component to which he/she is assigned. These records include cables, memoranda, e-mail, meeting minutes, instant messaging, audio and video recordings, and speeches.

(U//~~ATUO~~) **Prior to leaving the Agency**, employees should ensure that the records they have received or created are in an **approved recordkeeping system**. Duplicate copies that employees have maintained in their offices for reference purposes should be destroyed. Employees leaving the Agency are reminded that no official materials, including copies, whether or not classified, are to be removed from Agency facilities without authorization.

(U//~~ATUO~~) An employee may take information of a **purely personal nature** not associated with official Agency activities when departing CIA and public service.

(b)(3) (U//~~ATUO~~) If you have any questions regarding the retention of federal records, please consult with your Directorate or component Information Management Officer or  Chief/Records and Classification Management Group, Office of Information Management,

(b)(3)  (This is **UNCLASSIFIED and ADMINISTRATIVE - INTERNAL USE ONLY.**)

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OPR: CIO EB NUMBER: 001-03  
2 October 2003

### (U) NON-TEXTUAL RECORDS PRESERVATION

(b)(3)

(U) This Employee Bulletin is being issued to ensure that Agency officers who permit their records to be stored outside of the Agency Records Center (ARC) or another National Archives and Records Administration (NARA) approved facility are aware of their responsibilities to maintain all records in accordance with [redacted] 36 CFR § 1220 - 1236.

(U) Of particular concern is the preservation of non-textual records appraised as permanent. These media are particularly fragile and require appropriate handling and storage in order to preserve the information contained therein. Examples of these types of records include motion picture film; still photography; imagery; film strips; sound and video recordings; posters and other graphic works; and multimedia productions with related finding aids and production documentation. Other non-paper records requiring special handling include microfilm and microfiche.

(U) Specific instruction for the preservation, maintenance, and transfer of these media to the National Archives can be found in:

- 36 Code of Federal Regulations § 1228.266, Transfer of audiovisual records
- 36 Code of Federal Regulations § 1228.270, Transfer of electronic records
- 36 Code of Federal Regulations § 1232, Audiovisual records management
- 36 Code of Federal Regulations § 1234, Electronic records management
- The NARA Publication, entitled "Managing Audiovisual Records "
- Additional information can be found in ISO standards 18911, 18918, and 18920.

(U) Agency offices that store non-textual media in their areas or with another storage provider (other than the ARC) must comply with the guidance noted above. At a minimum, managers must ensure that:

- Audiovisual media records are stored in a facility where the temperature does not exceed 70 degrees Fahrenheit and relative humidity is below 50 percent. (Lower temperature and humidity levels prolong the useful life of these records.)
- Film records requiring long-term retention are of the polyester-based silver gelatin type as opposed to cellulose-acetate film, which deteriorates over time.
- Equipment intended for projection or playback of all non-textual media is in good working order.
- Permanent audiovisual records be inspected every two years for damage or deterioration.
- All photographs are placed in inert plastic sleeves. (Inert plastics and other storage materials are described in the ISO standard 18902:200)
- All media is packaged in inert plastic, non-corroding metal, or acid-free paper based containers.
- Silver gelatin originals are separated from non-silver reference copies and, if necessary, stored off-site of the customer premises.

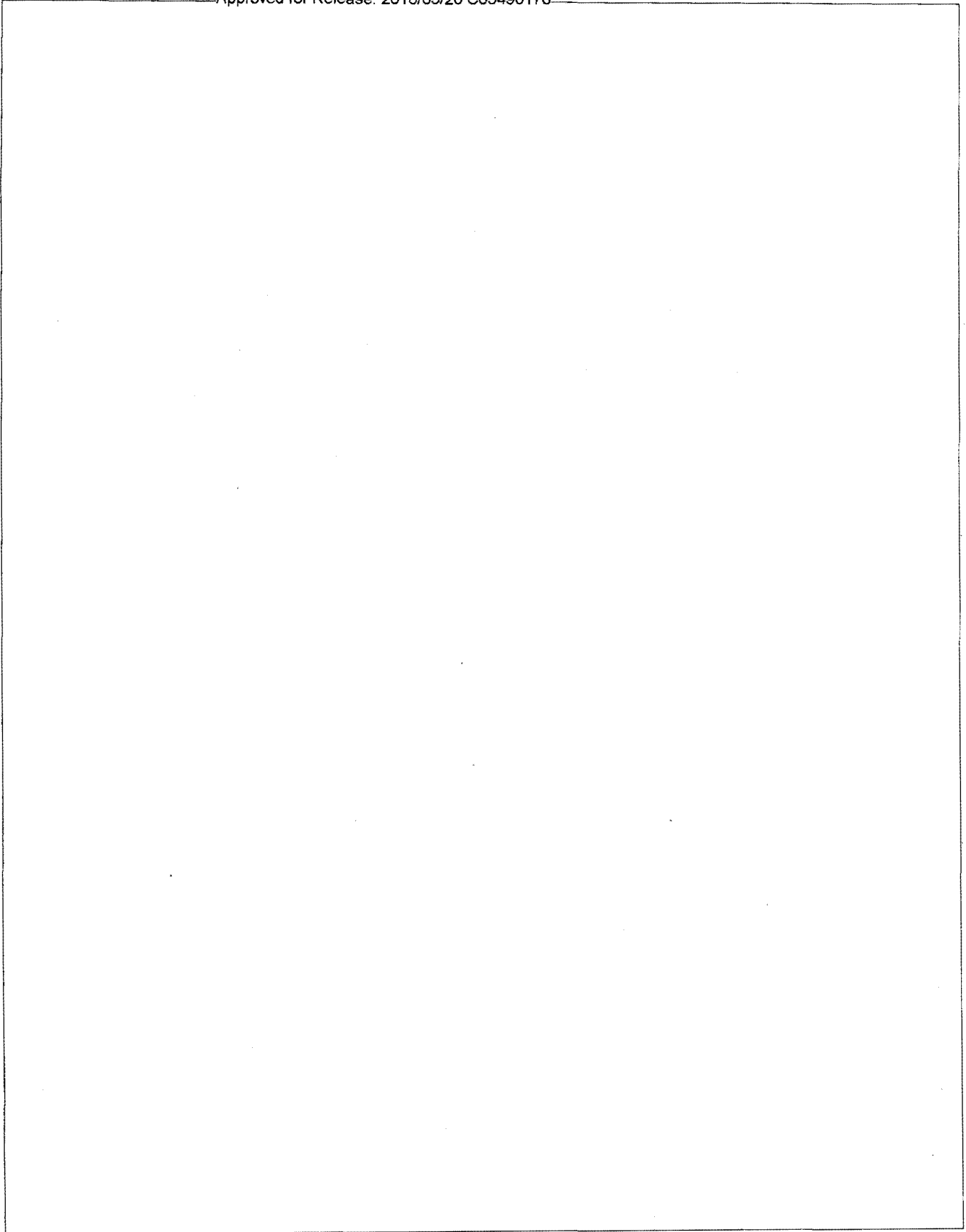
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(U) NARA has determined that the ARC meets the Federal standards to ensure that records maintained at the AARC are properly safeguarded and preserved. The ARC not only maintains a controlled environment but also periodically reviews film and other non-textual media for signs of potential deterioration.

(U//~~ATUC~~) Component managers may wish to consider using the ARC to store non-textual materials that they now maintain within their office or other facilities under their control. Questions regarding the preservation of non-textual media can be addressed to ARC personnel or to your Directorate or component Information Management Officer.

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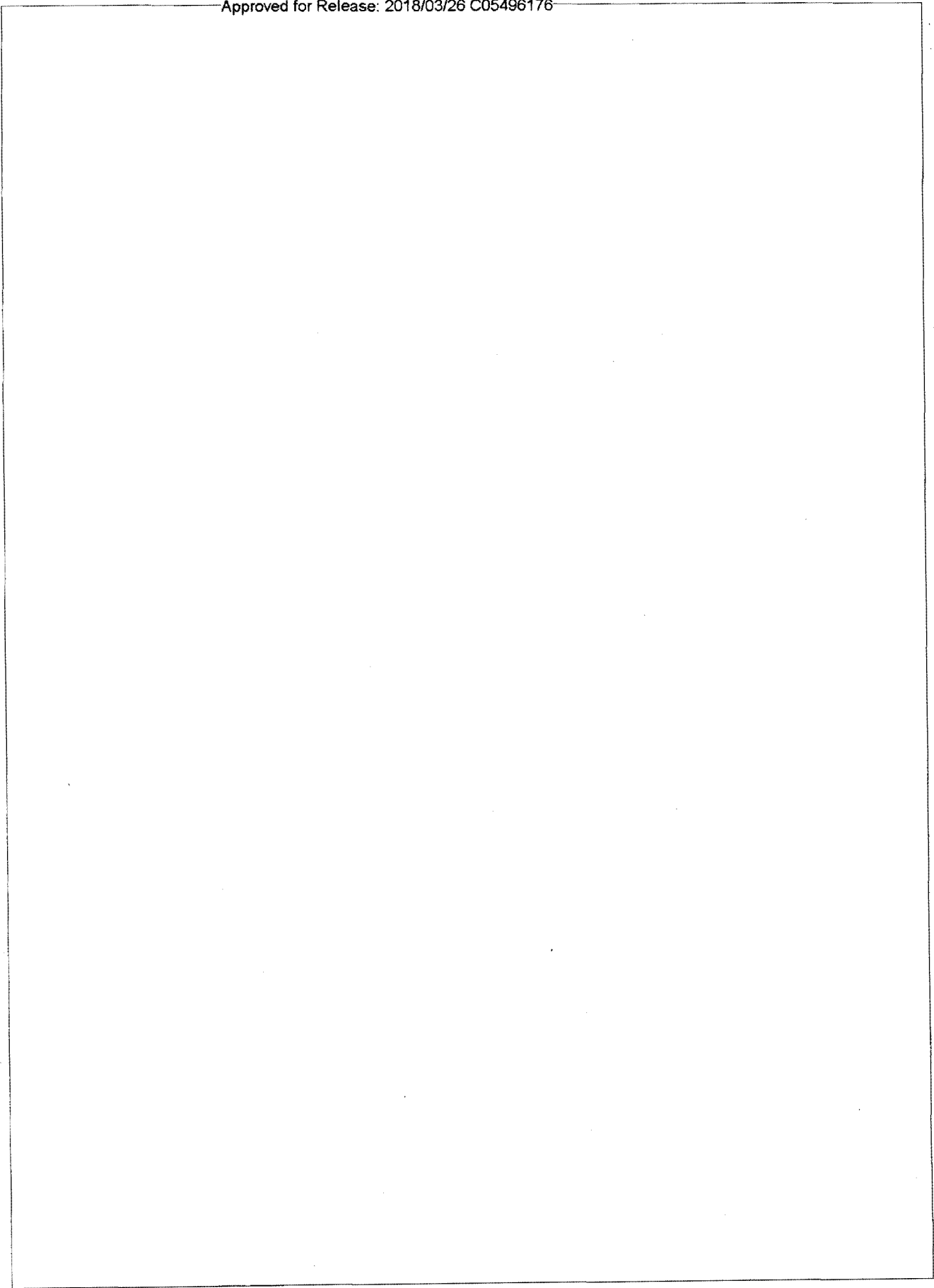


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(b)(5)

(b)(5)

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)

(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]

(b)(3) [redacted] at your convenience after you have reviewed our progress report.

Sincerely,

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

[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:

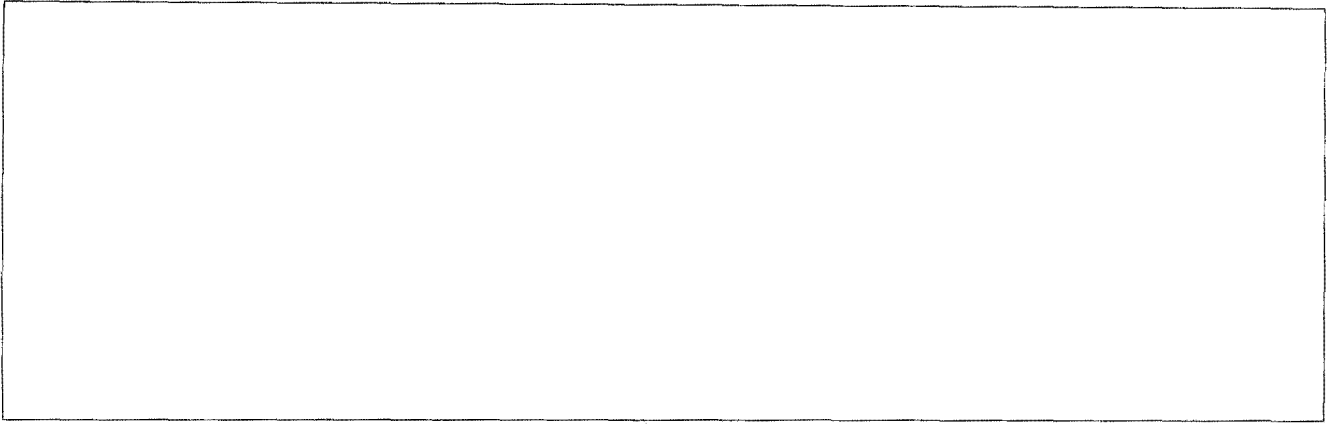
- (b)(3)      ▪ (U) Modify [redacted] to require a review by ARC staff of the assigned disposition authority.
- (b)(3)      ▪ (U) Further modify [redacted] as noted by NARA.

CIA Response:

[Large redacted area]

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Recommendation II/8:

(b)(3) (U) Continue the recent initiatives to revitalize the Vital Records Program. Ensure [redacted] that IMO's 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:**

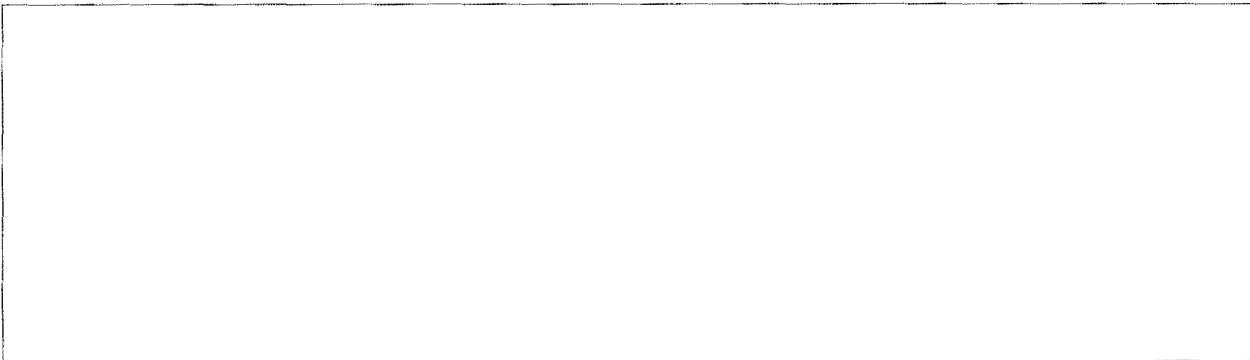
- (U) The section of the PERM General User Training on "Agency Records" should be revised to read "documents, e-mail, and other materials that records office organization, functions, policies, decisions, procedures, activities, and essential transactions."
- (U) The section of the PERM General User Training 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)



UNCLASSIFIED//~~FOUO~~

**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.

UNCLASSIFIED//~~FOUO~~

**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.

UNCLASSIFIED//~~FOUO~~

**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.

UNCLASSIFIED//~~FOUO~~

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 [redacted] 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)

[redacted]

(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.

UNCLASSIFIED//~~FOUO~~

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)



Washington, D. C. 20505

28 September 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 8 April 200<sup>4</sup>, we have taken the requested actions to close out eight more of the recommendations addressed in your evaluation "Records Management in the Central Intelligence Agency". The attached progress report details our actions with respect to the following recommendations: II/3, III/4, III/6, III/7, IV/1, IV/4, IV/5, VI/5.

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



(b)(3)

(U//~~FOUO~~) I would welcome an opportunity to discuss recommendation III/4 and an approach to the closure of the remaining six recommendations. Please call [redacted] or me [redacted] at your convenience after you have reviewed our progress report.

(b)(3)

(b)(3)  
(b)(6)

Sincerely,



Director, Information Management Services

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



(b)(3)

Classification is U//~~FOUO~~ when Separated from Enclosures

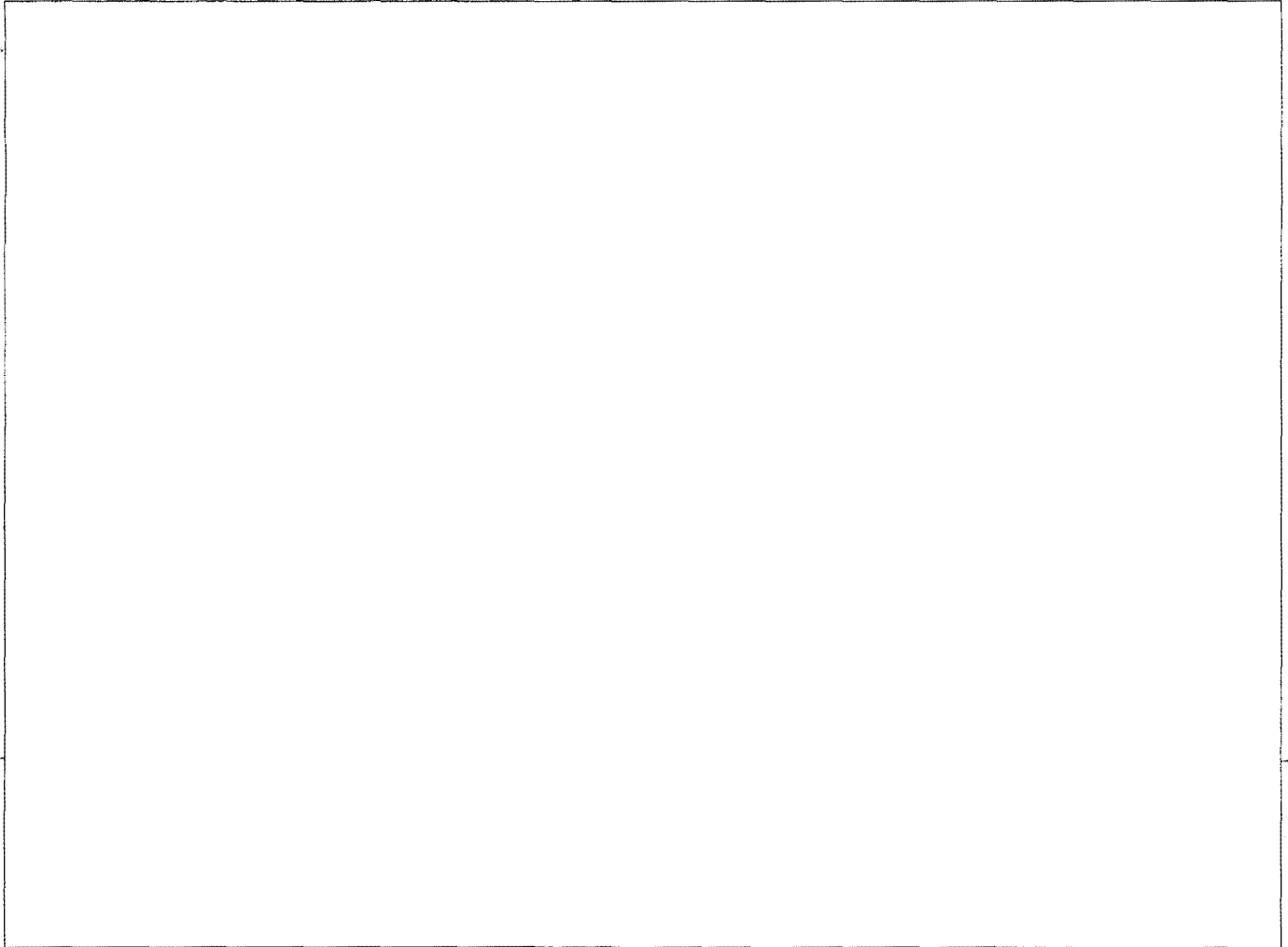


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(u)(c)  
(b)(5)



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





**28 September 2004**

**Progress Report on the NARA Evaluation  
of CIA Record Keeping Practices**

UNCLASSIFIED//~~FOUO~~

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**(U) Records Creation and Maintenance**

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Recommendation IV/1

Recommendation IV/4

Recommendation IV/5

**(U) Audiovisual and Cartographic Records**

Recommendation VI/5

(b)(3)



**Recommendation II/3:**

(U) Monitor the implementation of the "Agency File Guide" to ensure that it is effective and meets the needs of the directorates.

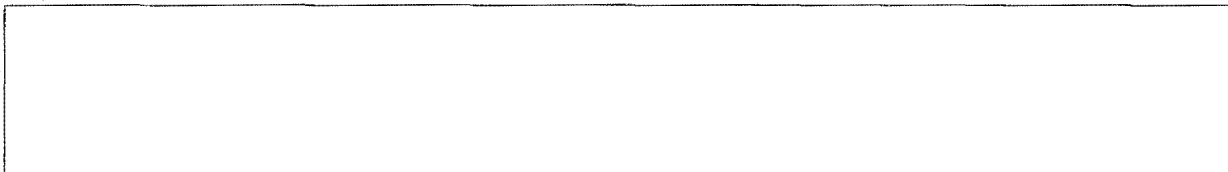
**Action Items Identified from Latest Correspondence:**

- (U) Since the Agency File Plan is based on schedules approved for paper records and PERM covers records in electronic format, do not use the file plan for the disposition of records before it is approved by NARA after submission of an SF 115, Request for Records Disposition authority.
- (U) Do not use the Agency File Plan as the basis for the disposition of any records, especially where the disposition noted in the File Plan conflicts with approved disposition of the series covered by a particular schedule.

**CIA Response:**

(U) As stated in our 8 April 2004 response to Recommendation III/3, the Agency is not currently utilizing the Agency File Plan for disposition. Rather, we follow the existing approved RCS items for disposing of Agency records.

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



**Recommendation III/4:**

(U) Work with NARA in the development of a revised schedule for DO operational project files; use this schedule as the basis for written guidance that is provided to those who review and/or process older operational files.

**Action Items Identified from Latest Correspondence:**

- (U) Submit a schedule reflecting NARA's determination that all parts of Operational Activity files (OPACT) warrant preservation.

**CIA Response:**

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

**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 NC1-263-85-1, Item 1e.

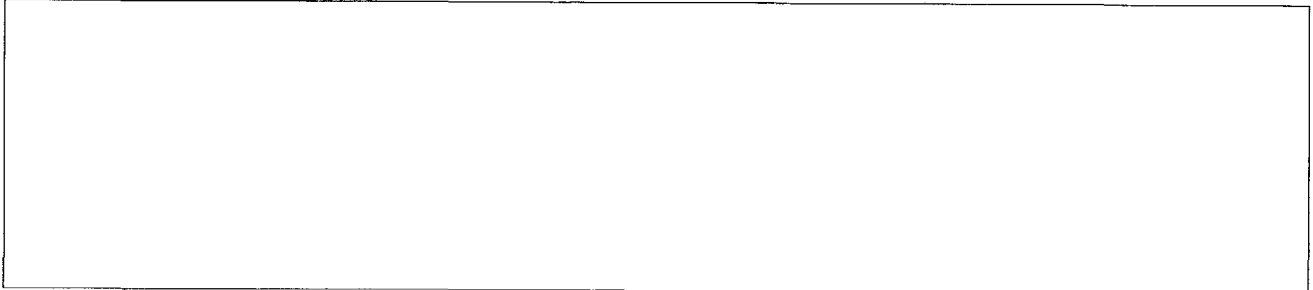
**Action Items Identified from Latest Correspondence:**

- (U) Forward information on the details of the sampling procedure and findings.

**CIA Response:**

(U) Your letter of 24 May 2004 indicates "CIA's explanation regarding chronological files used as finding aids or indexes is sufficient to meet the requirements of this recommendation. We continue to look forward to receiving information on the details of the sampling procedure and findings. This recommendation will be closed when we receive that information."

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

UNCLASSIFIED//~~FOUO~~

**Recommendation III/7:**

(U) Continue the project to apply correct schedule items to ARC accessions improperly retired as permanent; include NARA review as part of this process.

**Action Items Identified from Latest Correspondence:**

- (U) Provide NARA with a tabular report indicating those jobs for which the disposition authority has been changed and the new and old disposition authorities.

**CIA Response:**

(U) The Agency Information Management Officers and ARC staff maintain an ongoing effort to validate the use of approved RCS items assigned to jobs accessioned to the ARC. The Agency's retirement process (as described in our December 15, 2003 reply) includes a series of quality checks. The Directorate IMO validates that the proper RCS item has been selected for each retirement job sent to the ARC. In the course of recalling material from the ARC, an Information Management Officer (IMO) may determine that an RCS item was previously misapplied. The IMO would then correct the RCS for the job, which subsequently would be verified by the Directorate IMO prior to the job's return to the ARC. This is the extent to which disposition changes would be made and are documented in the job's shelf-list comment field, but no standard report of these changes is currently available.

UNCLASSIFIED//~~FOUO~~

Recommendation IV/1:

(U) Comply with NARA guidance contained in 36 CFR 1234 when electronic systems are developed, maintained, or upgraded. Of particular importance is the need to include migration strategies as part of the life-cycle planning for electronic records systems design and implementation.

Action Items Identified from Latest Correspondence:

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

CIA Response:

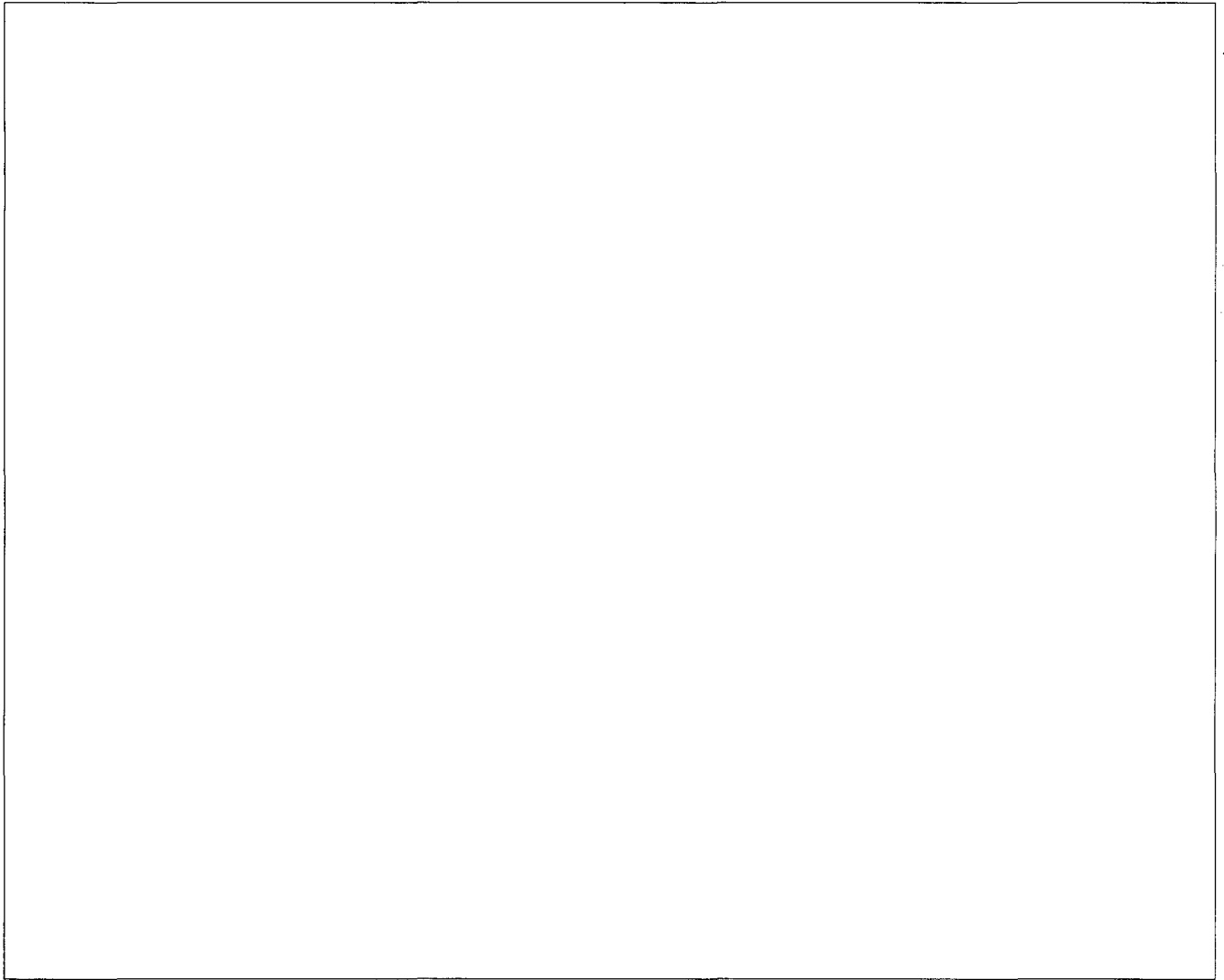
(b)(3)  
(b)(5)

(b)(3)

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(b)(3)



UNCLASSIFIED//~~FOUO~~

**Recommendation IV/4:**

(U) Complete the centralized catalogue project so the agency will have a comprehensive, agency-wide inventory of electronic records. After the centralized catalogue is completed, implement measures to keep it current as additional systems are developed.

**Action Items Identified from Latest Correspondence:**

- (U) NARA is concerned about the unevenness of implementation of CATDB and would appreciate continued updates with your next reports.

**CIA Response:**

(U) We are continuing our efforts to identify all existing databases and will report to you as additional information becomes available. With respect to your concern about "unevenness" we expect that our continued survey will confirm that the number of databases varies significantly from directorate to directorate.

UNCLASSIFIED//~~FOUO~~

**Recommendation IV/5:**

(U) Using the centralized catalogue data as well as pre-existing inventories and lists, work with NARA to initiate and carry out a project to ensure that all CIA electronic records systems are eventually covered by NARA-approved schedules. This effort should begin as soon as possible, using existing inventory information, and should encompass the review in coordination with NARA of housekeeping systems to determine which are covered by the GRS and which are not. Develop schedules for non-GRS records, beginning with those that pertain to CIA's core missions and are the most likely to be appraised as permanent.

**Action Items Identified from Latest Correspondence:**

- (U) CIA must work with NARA to ensure that all CIA electronic records systems are eventually covered by NARA-approved schedules. CIA's approved schedules, which were largely approved for paper records only, may not be applied analogously to electronic records.

**CIA Response:**

(b)(3)

UNCLASSIFIED//~~FOUO~~

**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 contained in accessions retired to the ARC prior to 1978.

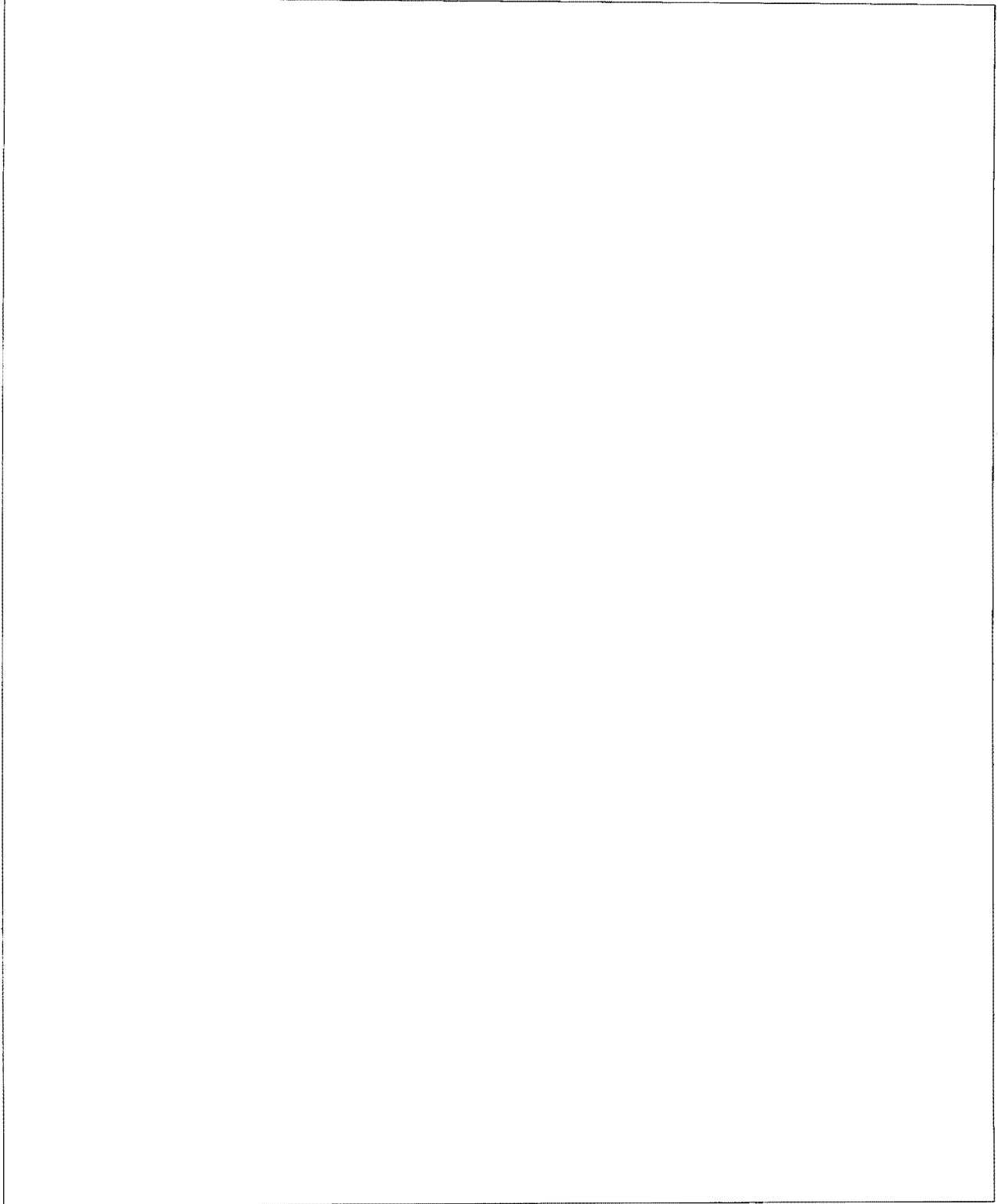
**Action Items Identified from Latest Correspondence:**

- (U) This recommendation will remain open until the reinspection is complete.

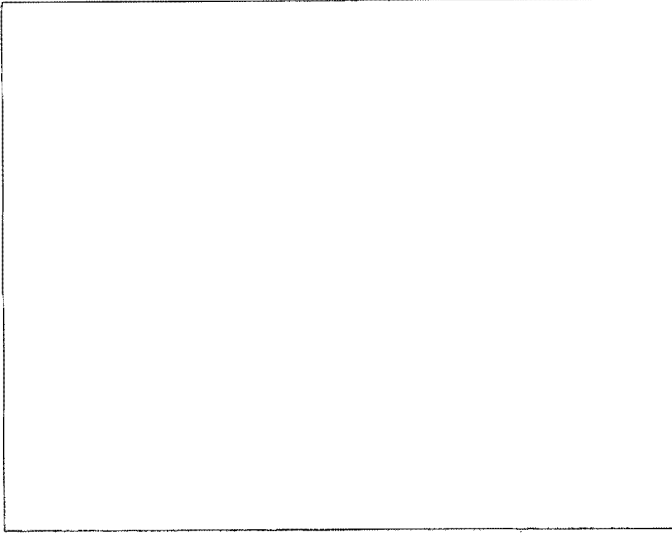
**CIA Response:**

(U) David Sponn, Space and Security Management Division, reinspected the Agency Records Center (ARC) on 7 July 2004 and found that it is compliant with NARA's records center requirements.

(b)(3)

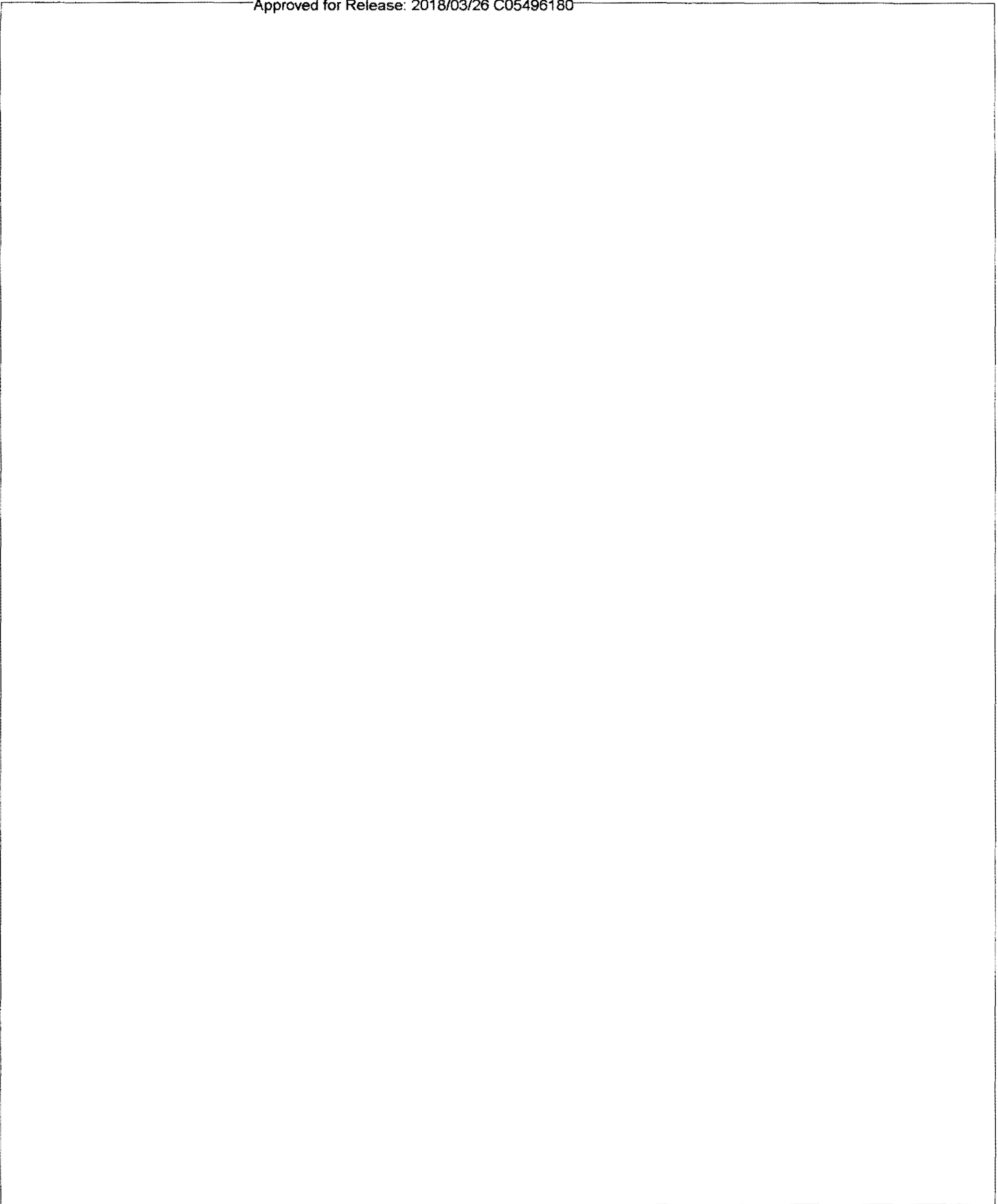


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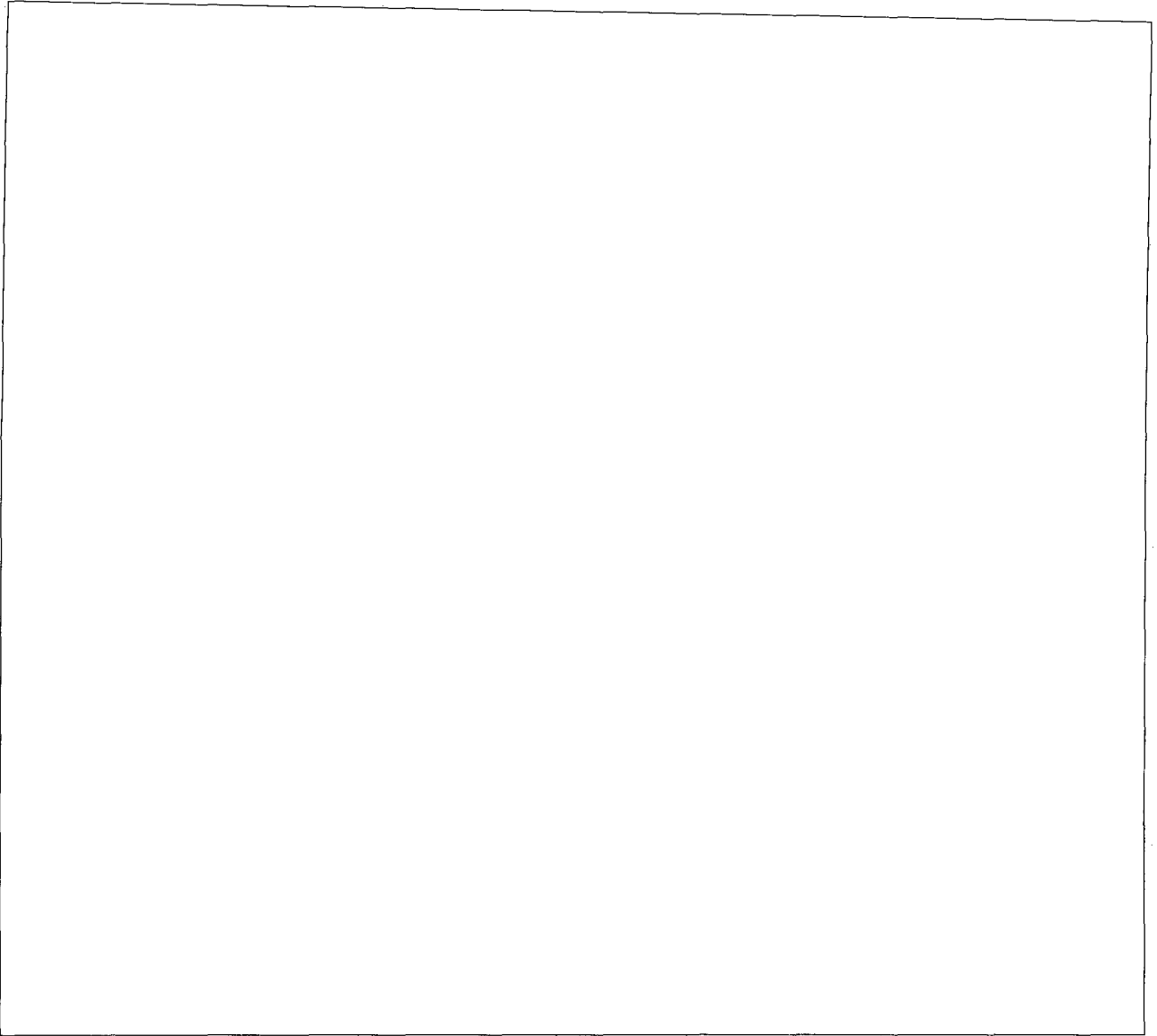








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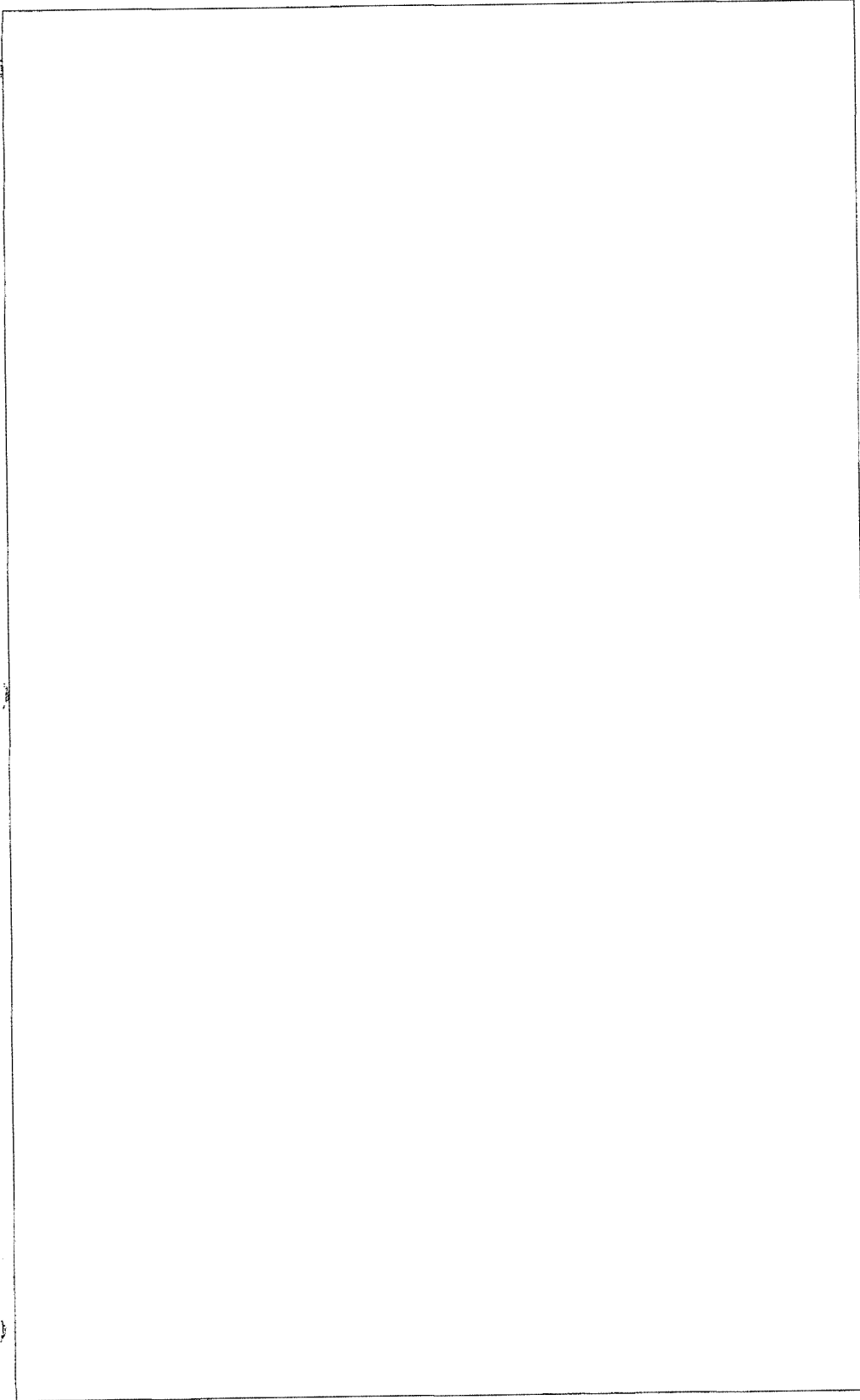


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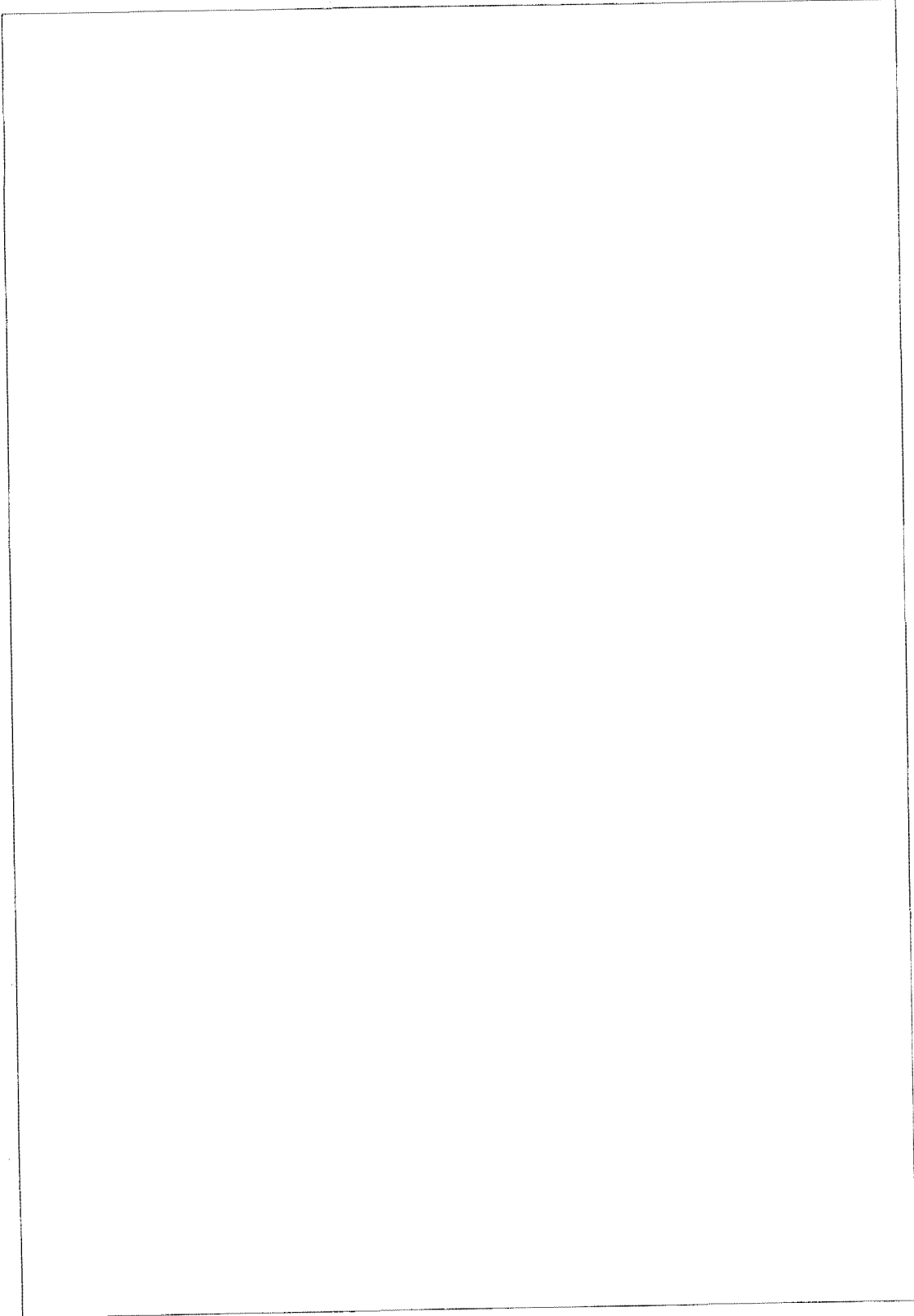
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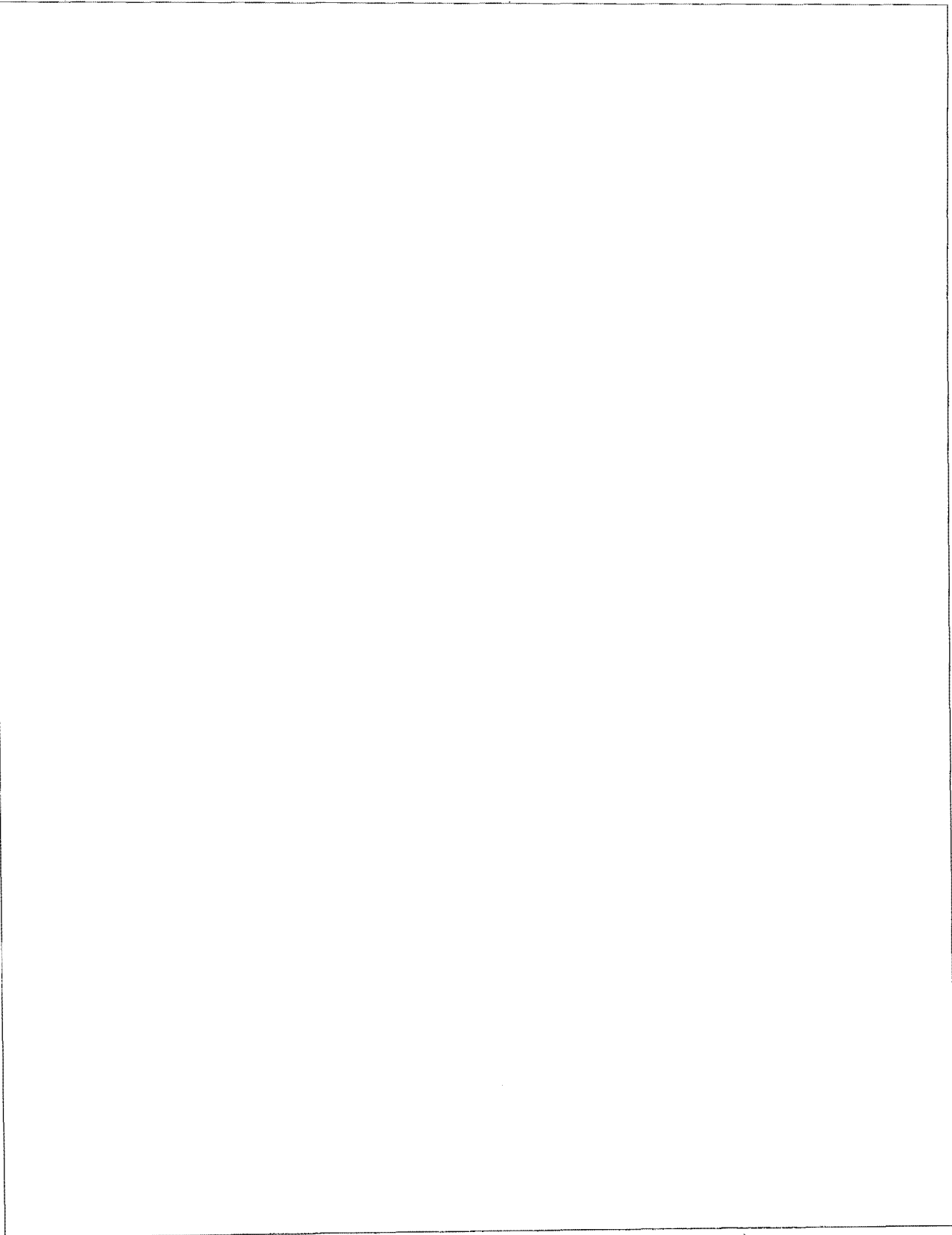
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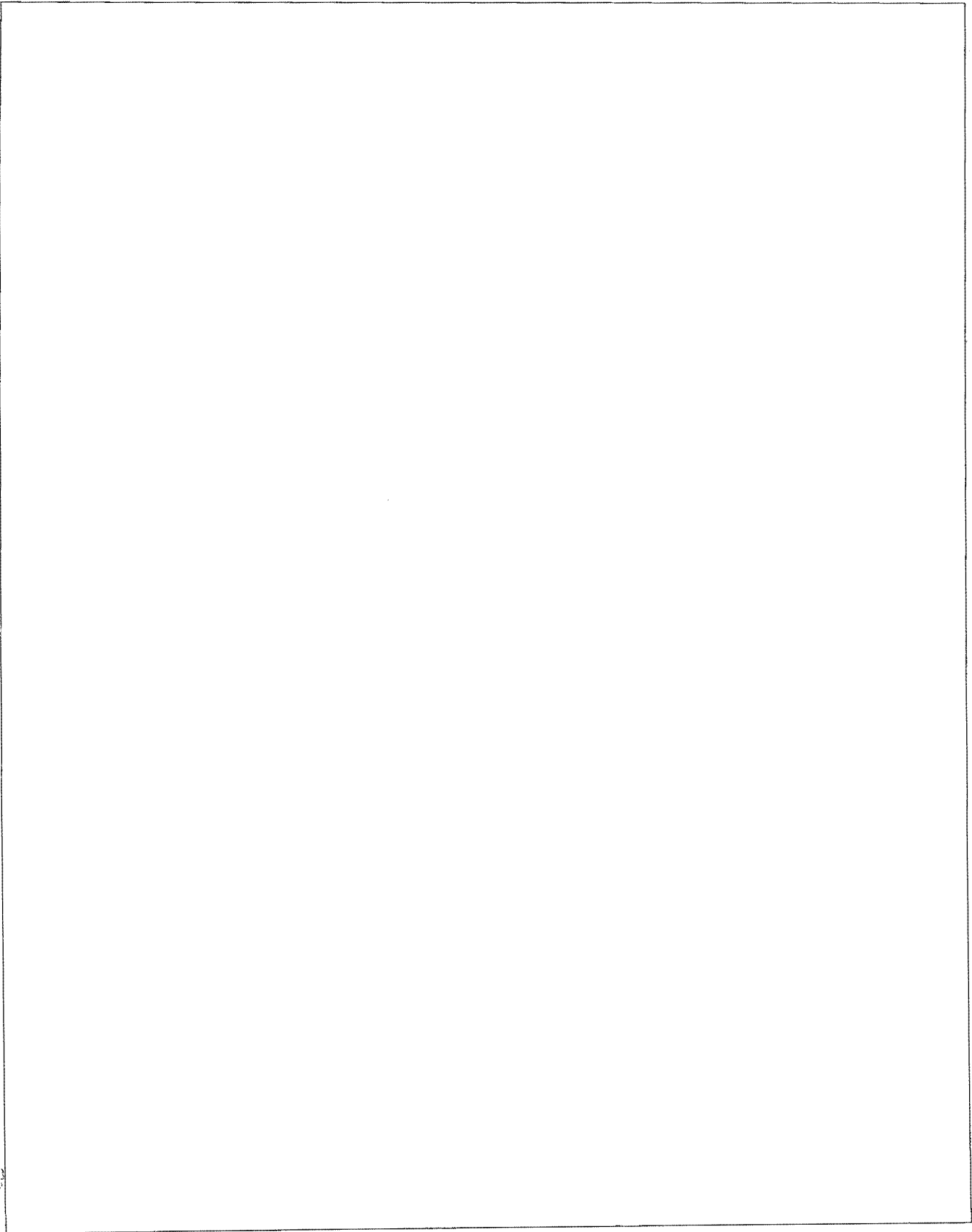
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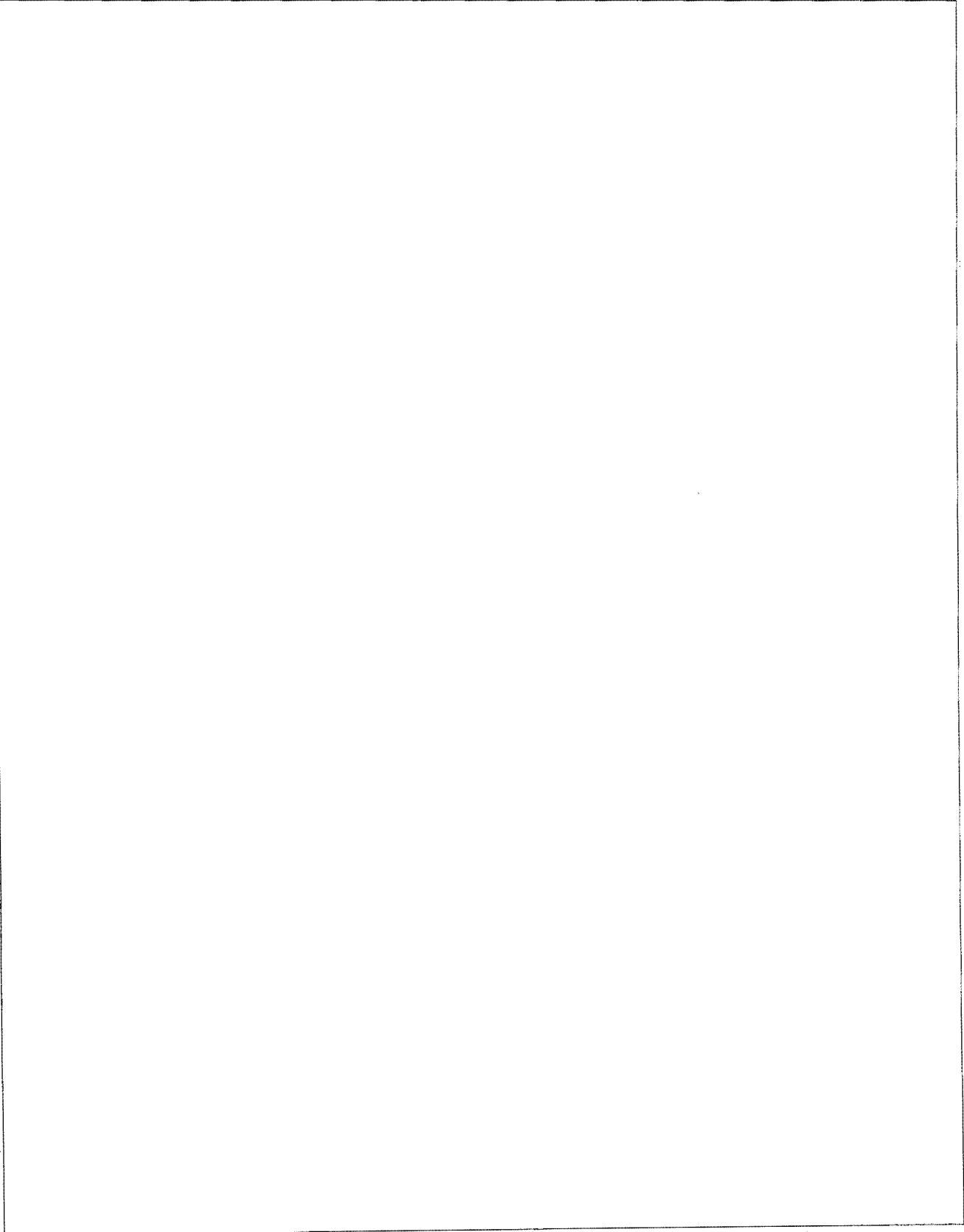
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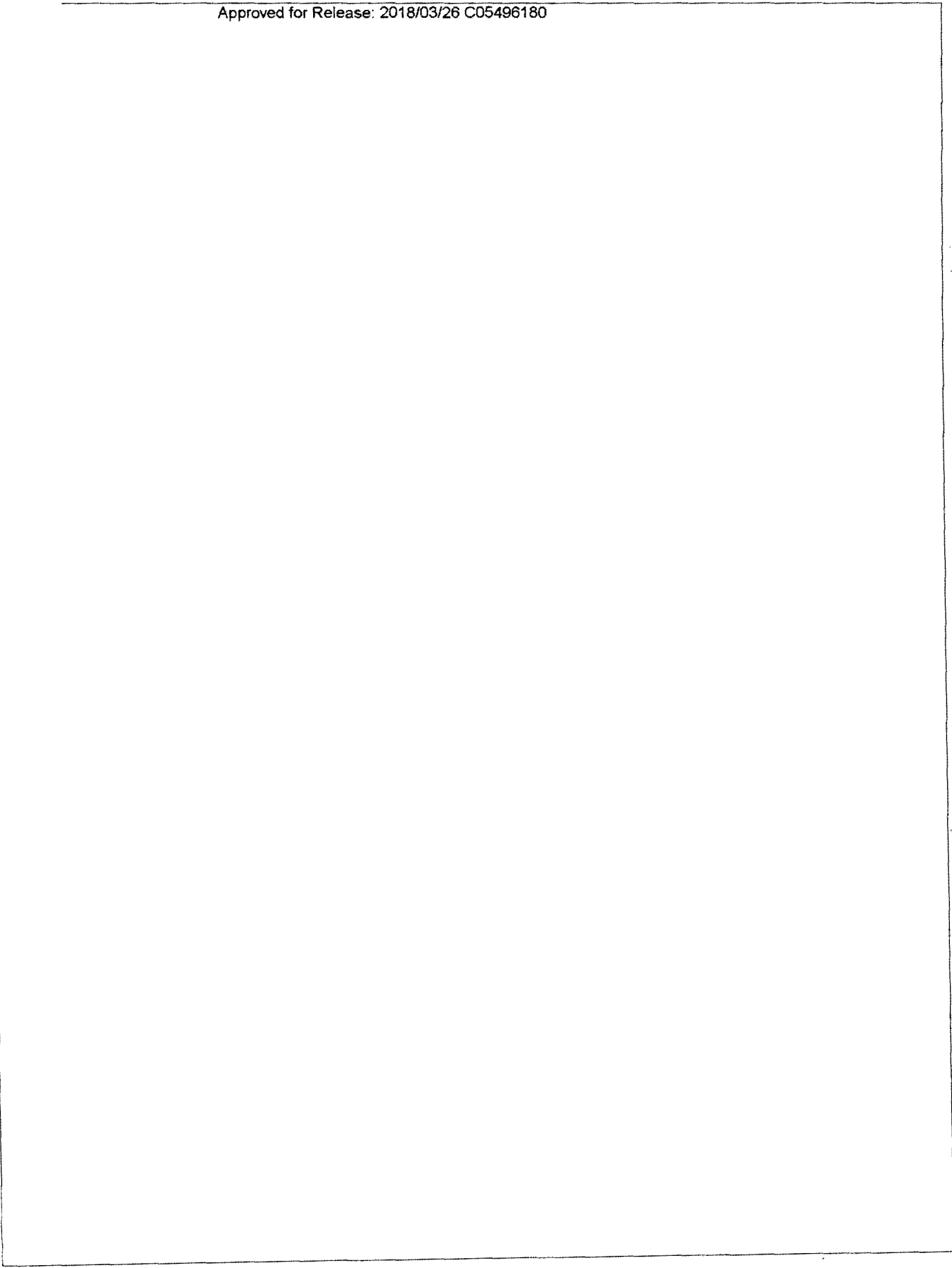




















Washington, D.C. 20505

4 August 2005

(b)(3)

[Redacted]

8/16/05

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) We have taken the required actions to close out ten more of the recommendations addressed in your evaluation "Records Management in the Central Intelligence Agency". The attached progress report details our actions with respect to the following recommendations: III/1, III/4, III/7, III/8, III/9, IV/1, IV/4, IV/5, VI/4a, and VI/4b.

(b)(3) (U//~~FOUO~~) Please call [Redacted] or me  
(b)(3) [Redacted] at your convenience after you have reviewed our progress report.

(b)(3)  
(b)(6) [Redacted]

Chief, Information Management Services

(b)(3) [Redacted]

Recommendation III/1:

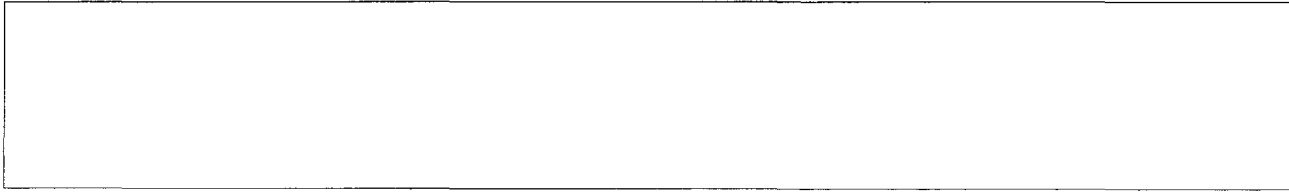
(U) Review full text and skeleton schedules for declassification; provide full text schedules to NARA even if portions are security classified.

Action Items Identified from Latest Correspondence:

- (U) NARA continues to look forward to receiving the results of the declassification review of the full-text records control schedules.

CIA Response:

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



**Recommendation III/4:**

(U) Work with NARA in the development of a revised schedule for DO operational project files; use this schedule as the basis for written guidance that is provided to those who review and/or process older operational files.

**Action Items Identified from Latest Correspondence:**

- (U) Work on the schedule to cover Operational Activity (OPACT) Files must be completed as a separate project.

**CIA Response:**

(U//~~FOUO~~) Given CIA submitted a revised OPACT schedule, we propose this item be closed. In addition, we recommend the appropriate people meet to discuss draft language to narrow the issues and prepare the OPACT matter for an Executive decision.

UNCLASSIFIED//~~FOUO~~

Recommendation III/7:

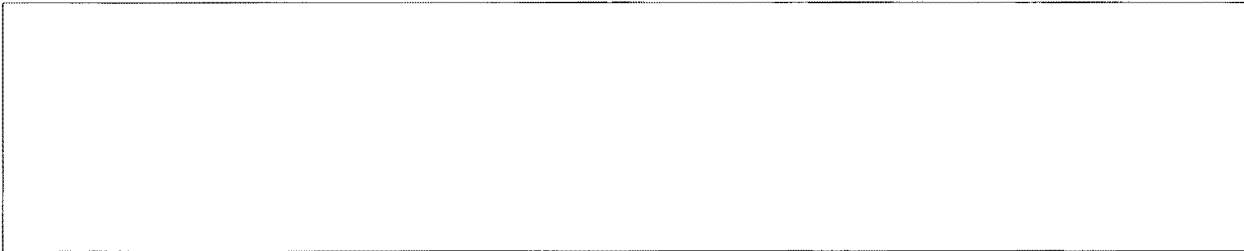
(U) Continue the project to apply correct schedule items to ARC accessions improperly retired as permanent; include NARA review as part of the process.

Action Items Identified from Latest Correspondence:

- (U) Before this recommendation can be closed, NARA must conduct a spot-check of accessions for which the disposition has been changed from permanent to temporary. Please provide us with a list of 10 or 15 jobs for which the disposition authority was changed so that we may conduct this review.

CIA Response:

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

~~UNCLASSIFIED//FOUO~~

**Recommendation III/8:**

(U) Work with NARA to develop transfer instructions for permanent records that reduce the age at which CIA records are typically accessioned by NARA and provide for the transfer of entire series (or chronological segments thereof). Take into account CIA plans to review files for declassification electronically.

**Action Items Identified from Latest Correspondence:**

- (U) In your next report, please provide details on your progress to identify collections, or segments of collections, that can be transferred when records are less than 50 years old.

**CIA Response:**

(U//~~FOUO~~) We agree to transfer records that have no continuing business value to the National Archives sooner than 50 years once the CIA and NARA Memorandum of Understanding has been signed.

UNCLASSIFIED//~~FOUO~~

**Recommendation III/9:**

(U) Work with NARA to develop a timetable for the transfer of specific files to the National Archives, with the goal of transferring by the end of 2003 most permanent files cut-off prior to 1961.

**Action Items Identified from Latest Correspondence:**

- (U) In order to complete action on this recommendation, CIA must identify those agency records center jobs that contain records pre-dating 1961 and transfer them to the National Archives.

**CIA Response:**

(U//~~FOUO~~) We agree to transfer Agency records pre-dating 1961 that have no continuing business value to the National Archives once the CIA and NARA Memorandum of Understanding has been signed.

**Recommendation IV/1:**

(U) Comply with NARA guidance contained in 36 CFR 1234 when electronic systems are developed, maintained, or upgraded. Of particular importance is the need to include migration strategies as part of the life cycle planning for electronic records systems design and implementation.

**Action Items Identified from Latest Correspondence:**

- (U) In your next report, please report on your review and revision of other IM Plans. Once this review is completed and any needed revisions are made, this recommendation can be closed.

**CIA Response:**

(U//~~FOUO~~) The Agency has agreed to insert NARA's suggested wording: "Migration of electronic records will be done in accordance with the principle of separation of content and format, in accordance with the protection of content, and in accordance with the goal that transfer formats will comply with NARA guidance in effect at the time" into all future IM plans prior to electronic system certification. We also agree to notify system owners of the previously certified systems that their data transfer format must comply with NARA guidance in effect at the time of transfer.

UNCLASSIFIED//~~FOUO~~

**Recommendation IV/5:**

(U) Using the centralized catalogue data as well as pre-existing inventories and lists, work with NARA to initiate and carry out a project to ensure that all electronic record systems are eventually covered by NARA-approved schedules. This effort should begin as soon as possible, using existing inventory information, and should encompass the review in coordination with NARA of housekeeping systems to determine which are covered by the GRS and which are not. Develop schedules for non-GRS-records, beginning with those that pertain to CIA's core missions and are the most likely to be appraised as permanent.

**Action Items Identified from Latest Correspondence:**

- (U) NARA must publish a notice in the Federal Register to any schedules that designate records as temporary and must allow interested parties to provide comments. NARA will work with CIA to develop a Federal Register Notice.

**CIA Response:**

(b)(3)

UNCLASSIFIED//~~FOUO~~



**Recommendation VI/4a:**

(U) Modify schedules to accelerate the transfer of non-textual records to NARA custody.

**Action Items Identified from Latest Correspondence:**

- (U) NARA is disappointed to see that the File Plan schedule, ostensibly intended to cover all CIA records, does not include any audio-visual or cartographic records.

**CIA Response:**

(U//~~FOUO~~) CIA's Records Control Schedule is intended to cover all records regardless of media type. Records that have no continuing business value will be transferred to the National Archives on an accelerated basis once the CIA and NARA Memorandum of Understanding has been signed.

UNCLASSIFIED//~~FOUO~~

**Recommendation VI/4b:**

(U) Immediately transfer the OSS map collection to NARA.

**Action Items Identified from Latest Correspondence:**

- (U) We are most interested in completing the transfer to the National Archives of all records designated as permanent on the OSS schedules.

**CIA Response:**

(U//~~FOUO~~) We have transferred all OSS maps that we have located to date to NARA. Please know that CIA found no OSS maps in CPAS

(b)(3)

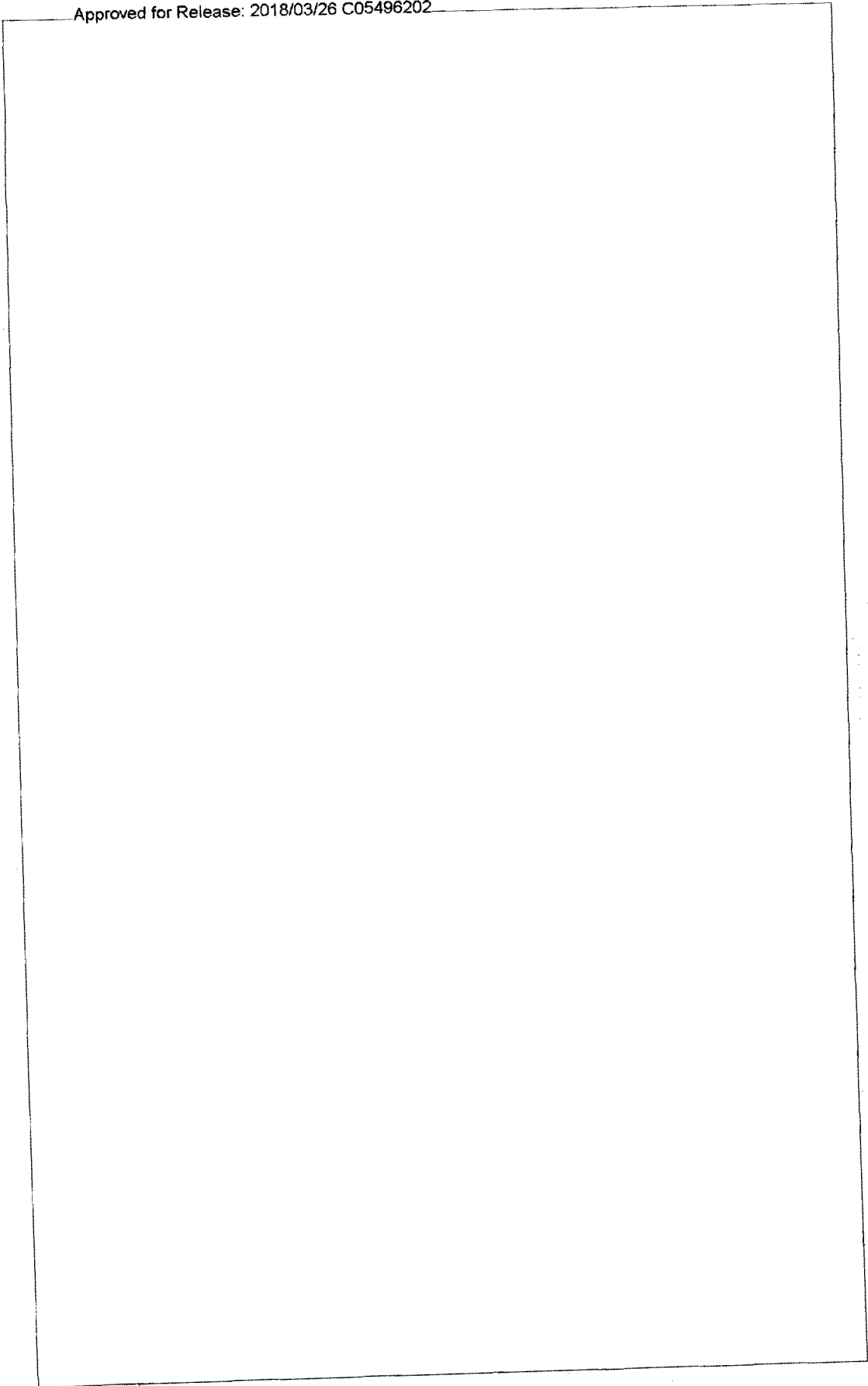
[REDACTED] the "Office of Support Services", and not the pre-Agency Office of Strategic Services (OSS).

UNCLASSIFIED//~~FOUO~~

Attachment A

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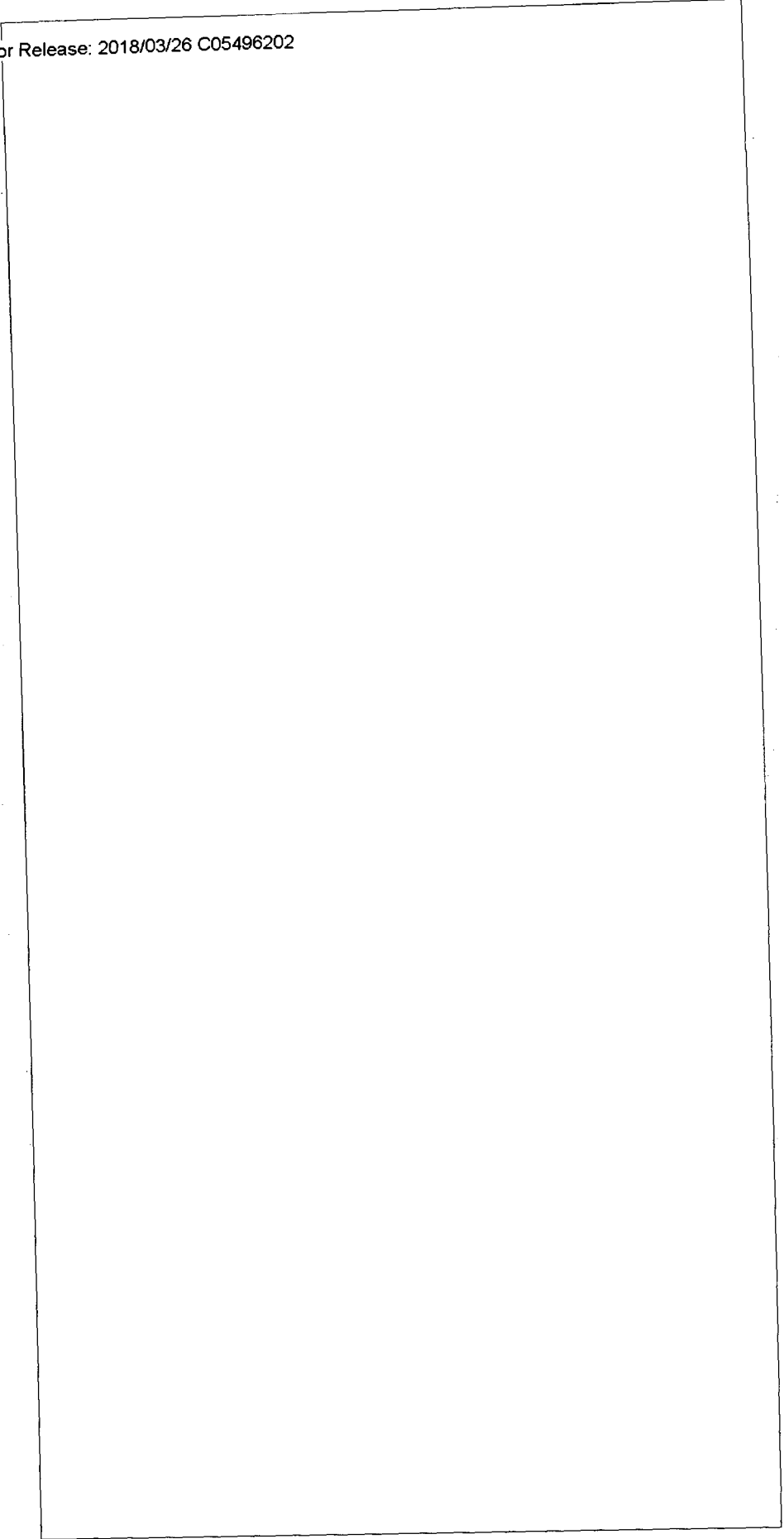
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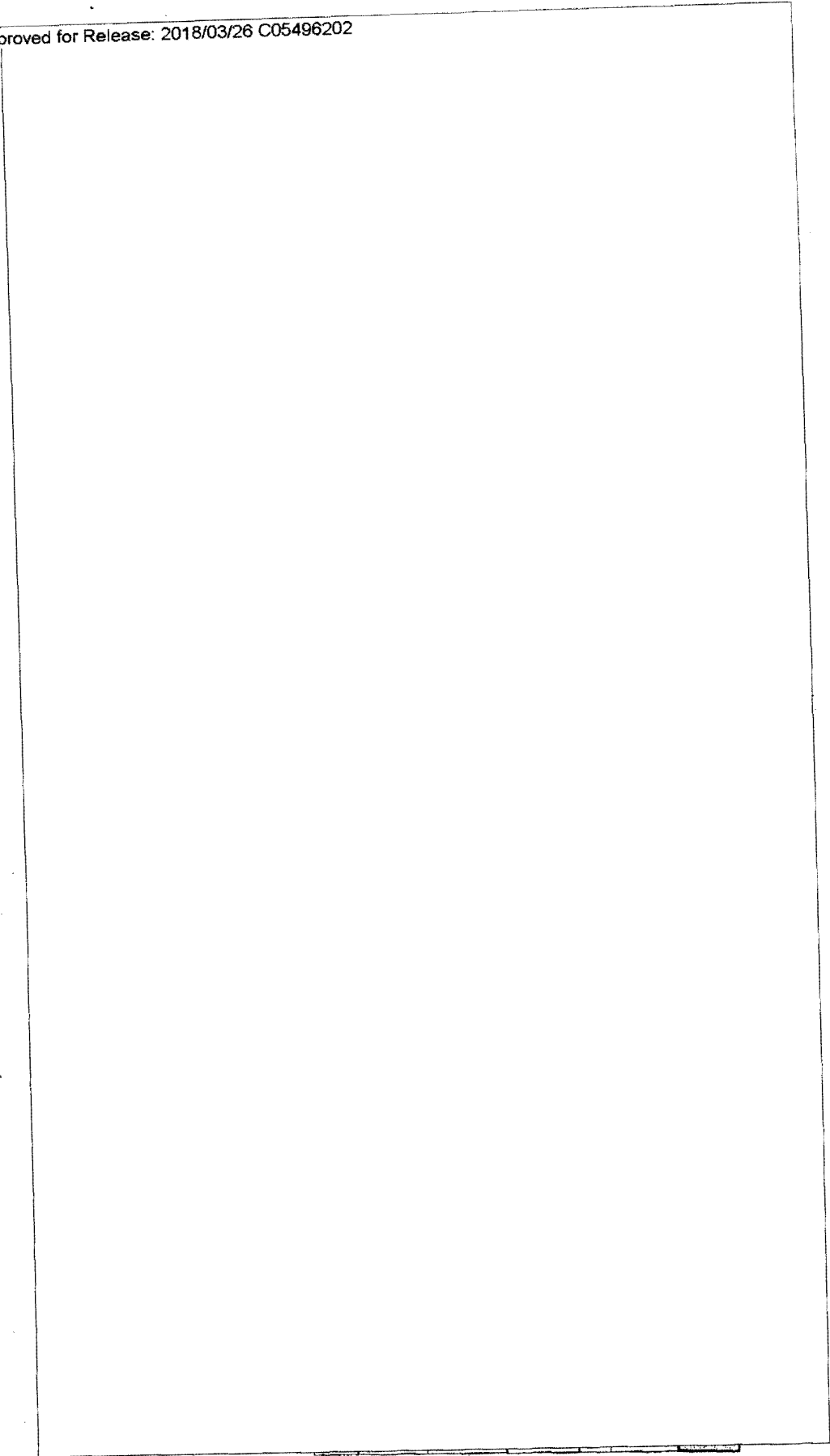
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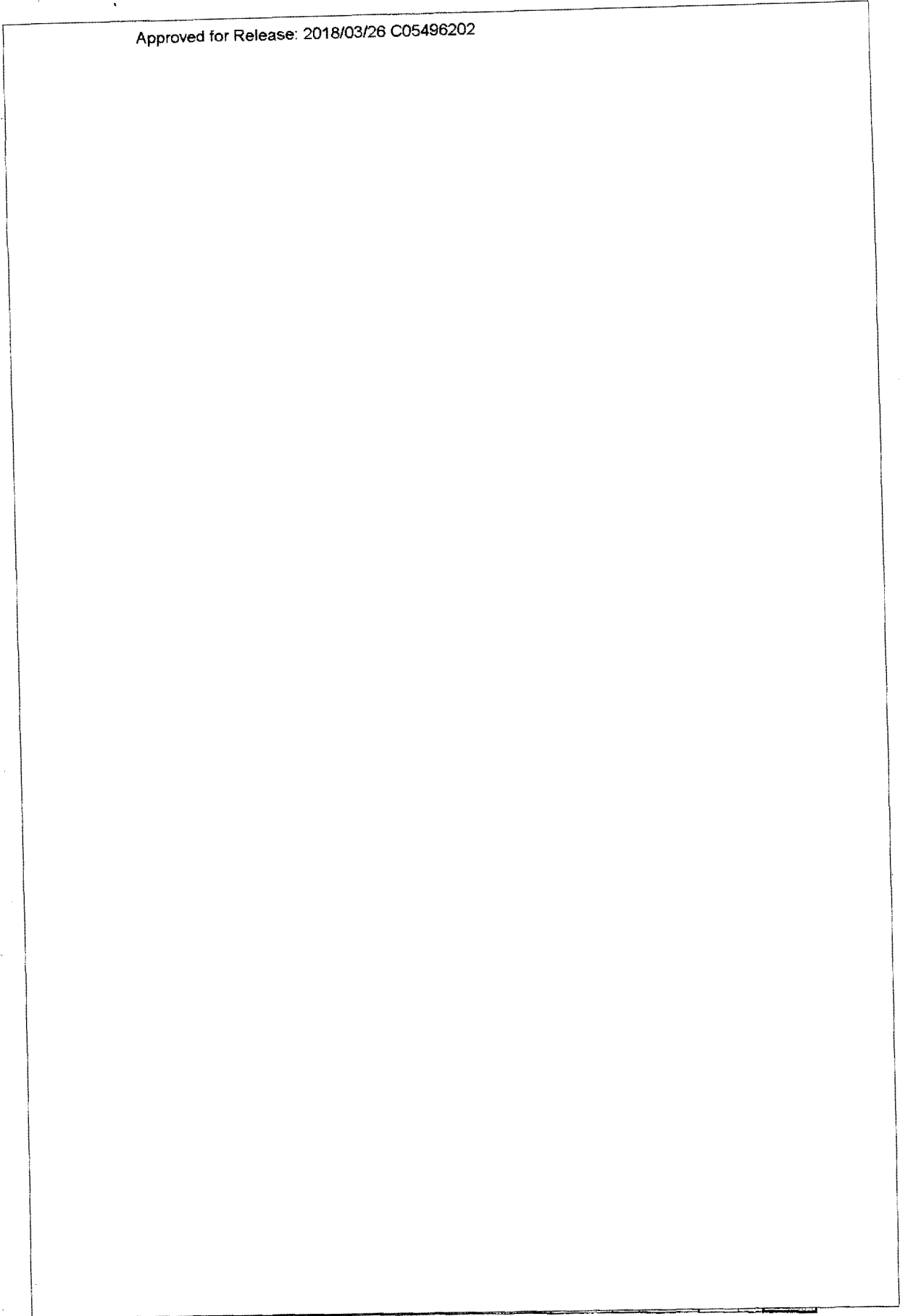
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## Attachment B

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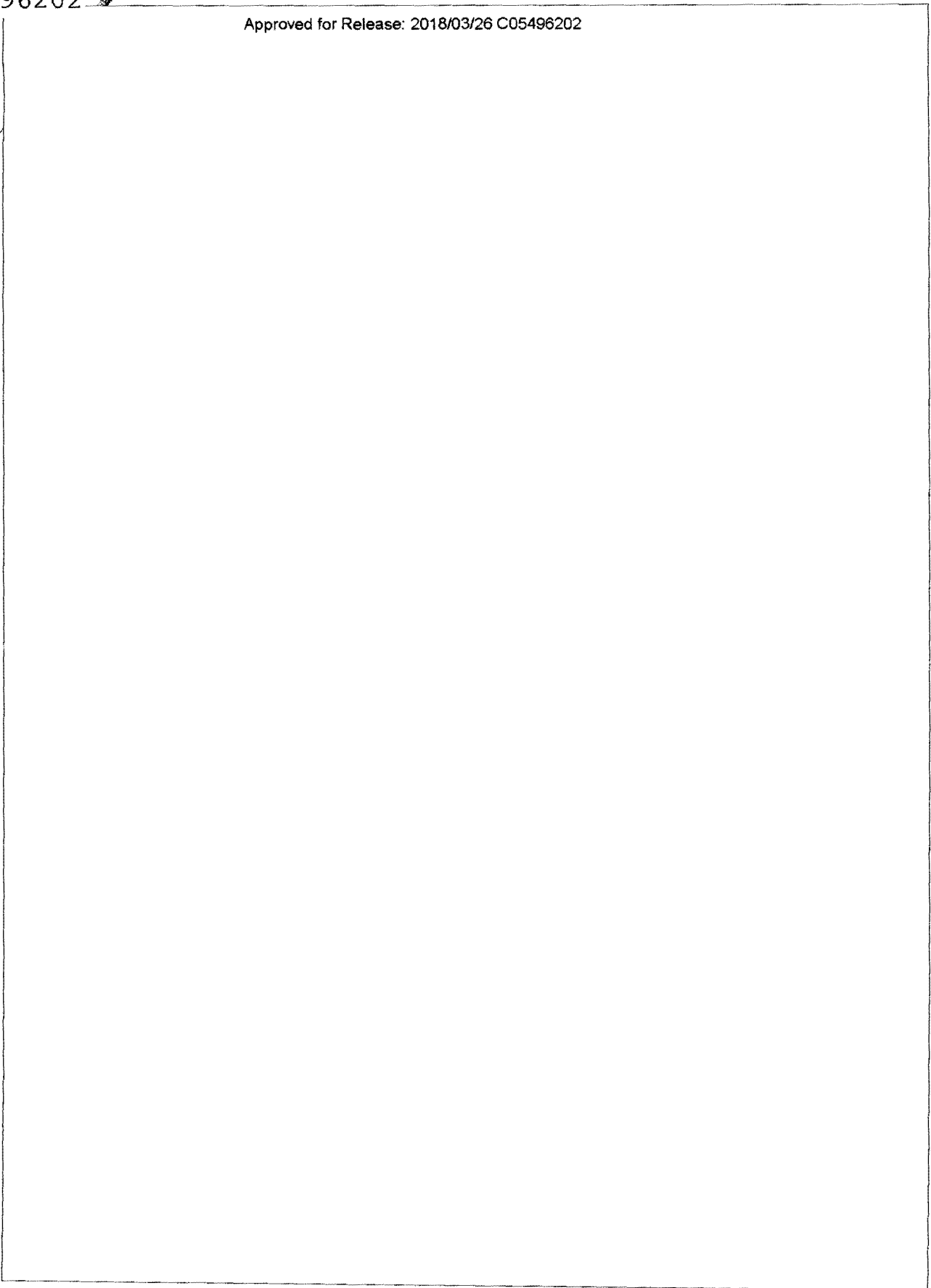
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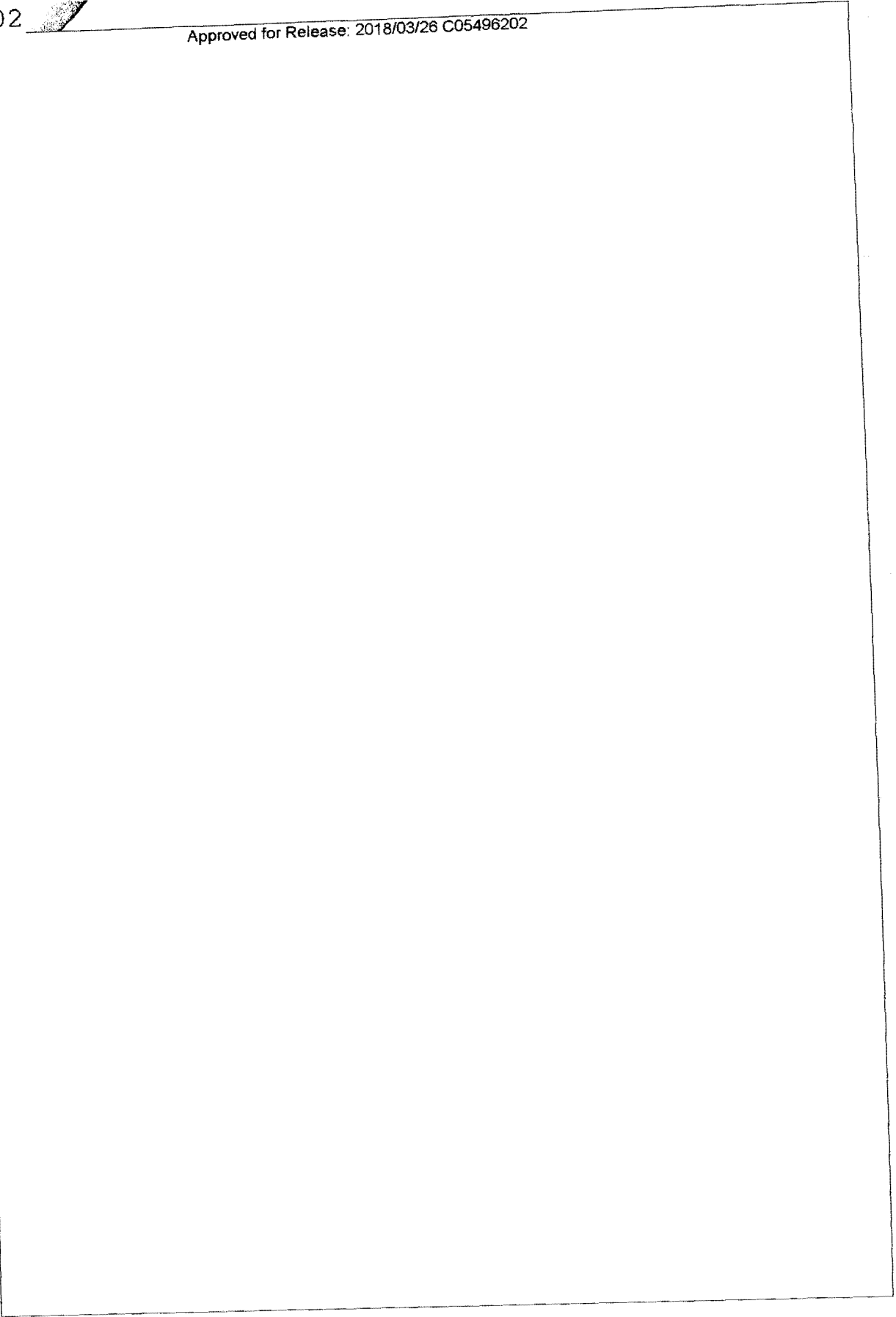


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Washington, D.C. 20505

Rec'd 7/11/06

28 June 2006

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

Dear Dr. Kurtz:

(U) We have taken the required actions to close six of the remaining nine recommendations addressed in your evaluation, *Records Management in the Central Intelligence Agency*. The enclosed progress report (Enclosure A) details our plans with respect to the following recommendations: III/1, III/4, IV/4, IV/5, VI/3, and VI/5. The remaining three recommendations (III/8, III/9, VI/4a) are dependent upon the *Memorandum of Understanding (MOU) Between the CIA and NARA*, which is currently being negotiated. These three recommendations will be addressed when the *MOU* is finalized.

(U//~~FOUO~~) Regarding the information requested on the closed recommendations I/1, II/1a, and II/7, we have enclosed the *Information Management Evaluation Project Report 2004 Survey Questions* (Enclosure B) and the *Executive Summary of the 2003 Information Management Evaluation Project Report* (Enclosure C). The full report of the 2003 Evaluation contains highly sensitive information. As agreed, arrangements have been made to loan a copy to NARA in care of David Langbart for a period of six months.

(b)(3)

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ATTACHMENT CLASSIFIED AS ABOVE. CLASSIFICATION OF TRANSMITTAL  
DOCUMENT (WHEN SEPARATED FROM ATTACHMENT): UNCLASSIFIED//~~FOUO~~  
~~CONFIDENTIAL~~//20310628



**UNCLASSIFIED**

Dr. Michael J. Kurtz

(b)(3) (U) Please call [redacted] or me  
(b)(3) [redacted] at your convenience after you have reviewed our  
progress report.

Sincerely,

(b)(3)  
(b)(6)

[redacted signature box]

Chief, Information Management Services

Enclosures:

- A. (U) Progress Report
- B. (U) Information Management  
Evaluation Project Report 2004  
Survey Questions
- C. (U) Executive Summary of the  
2003 Information Management  
Evaluation Project Report

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**ENCLOSURE**

Recommendation III/1:

(U) Review full text and skeleton schedules for declassification; provide full text schedules to NARA even if portions are security classified.

Action Items Identified from Latest Correspondence:

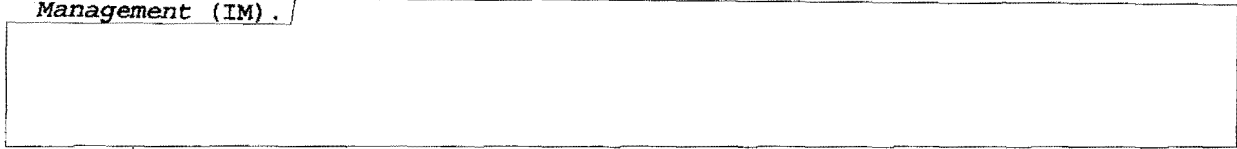
- (U) NARA requests a complete, detailed, unclassified version, covering both temporary and permanent items.

CIA Response:

(U//~~FOUO~~) Based upon discussions with the NARA representative, we understand that NARA plans to proceed with the review of the new Records Control Schedule (RCS) in sections, beginning with the section on Information Management (IM).

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(b)(5)



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**Recommendation III/4:**

(U) Work with NARA in the development of a revised schedule for DO operational project files; use this schedule as the basis for written guidance that is provided to those who review and/or process older operational files.

**Action Items Identified from Latest Correspondence:**

- (U) This recommendation cannot be closed until the revised schedule is signed by the Archivist.

**CIA Response:**

(U//~~FOUO~~) CIA has agreed with NARA's recommendation and submitted a revised OPACT schedule, which NARA received on May 1, 2006.

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**Recommendation IV/4:**

(U) Complete the centralized catalogue project so the agency will have a comprehensive, agency-wide inventory of electronic records. After the centralized catalogue is completed, implement measures to keep it current as additional systems are developed.

**Action Items Identified from Latest Correspondence:**

- (U) Please provide an updated report on the implementation of CATDB in your next progress report.

**CIA Response:**

(U//~~FOUO~~) The Catalog of Databases ("CATDB") is old database technology that lacked workflow and was developed primarily to support records management, e.g., the assignment of retention schedules to systems or collections in the Agency. The Agency Information Technology Offices have mandated a separate application tracking process and introduced a system to meet the technology requirements. We have discussed merging the two systems to better meet Agency requirements and reduce duplication of effort caused by two tracking systems. We continue to promote use of CATDB as evidenced in our new *Information Management Reference Manual*. Updates are still being placed in CATDB, and systems are being identified in the new system. We will continue to put new information into CATDB until all is transferred to the new system, which will cover electronic and non-electronic collections. We will work closely with NARA to ensure records management needs are met by this new system.

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**Recommendation IV/5:**

(U) Using the centralized catalogue data as well as pre-existing inventories and lists, work with NARA to initiate and carry out a project to ensure that all electronic record systems are eventually covered by NARA-approved schedules. This effort should begin as soon as possible, using existing inventory information, and should encompass the review in coordination with NARA of housekeeping systems to determine which are covered by the GRS and which are not. Develop schedules for non-GRS-records, beginning with those that pertain to CIA's core missions and are the most likely to be appraised as permanent.

**Action Items Identified from Latest Correspondence:**

- (U) NARA looks to CIA to identify the individual electronic systems that fall under each series. Once appraisal is begun this recommendation will be closed.

**CIA Response:**

(U//~~FOUO~~) CIA provided NARA with an updated RCS intended to address the disposition of all CIA records regardless of media. As is done today, the Information Management Officer (IMO) will work with the system owner/developer to ensure that the records maintained in each system are identified against an existing authority for disposition. CATDB was but one system used to record collections or systems newly established in CIA. The index allowed the offices to ensure records maintained in that system are scheduled. We continue to use CATDB as well as the Agency's portfolio management system (of new IT systems under development or operational) to document the retention of records maintained in those systems. As each section of CIA's new RCS is approved, we will ensure that CATDB entries align to the new records disposition authorities; and, to the extent that a new system maintains records not covered under the authorities, we will submit SF-115s for the new records series.

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Recommendation VI/3:

(U) Inventory non-text records and develop schedules for all unscheduled series as well as specific schedule items for certain major collections now covered by generic authorities identified in this report.

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Action Items Identified from February 2005 Correspondence:

(b)(3)

CIA Response:

(U//~~FOUO~~)

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CIA is adding media-specific terms to the RCS as appropriate. These additional media-specific terms will be reflected in each RCS section as it is reviewed by NARA, beginning with Information Management. In conjunction with NARA, CIA will develop a preamble to its new RCS that will detail the special media requirements.

Recommendation VI/5:

(U) Develop and implement a plan to preserve non-textual series that must remain in CIA custody for more than 10 years.

Action Items Identified from February 2005 Correspondence:

- (U) There are several areas where the ARC is presently not compliant with the regulations.

CIA Response:

(U//~~FOUO~~) Per the recommendation, a plan has been developed and implemented to preserve non-textual series that must remain in CIA custody for more than 10 years.

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





**See classified file.**

**See classified file.**