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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.

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(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.

Sincerely,

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Director, Information Management Services

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**28 September 2004**

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

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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.

**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.



**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:**

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**Recommendation III/6:**

(U) Treat as chron files only copies of outgoing correspondence maintained for ready reference. Chron files that are used as finding aids to other records should be disposed of or retained as indexes in accordance with NC1-263-85-1, 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."



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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 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.

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**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:**

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**CIA Response:**

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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) 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.

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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 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:**

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**Recommendation VI/5:**

(U) Develop and implement a plan to preserve nontextual series that must remain in CIA custody for more than 10 years. Include upgrading storage conditions in the ARC to meet NARA standards for the storage of permanent nontextual records, copying permanent records maintained on obsolete media to contemporary formats, and reviewing the ARC's nontextual holdings to identify accessions in need of preservation action. Particular attention should be paid to locating nontextual records contained in accessions retired to the ARC prior to 1978.

**Action Items Identified from Latest Correspondence:**

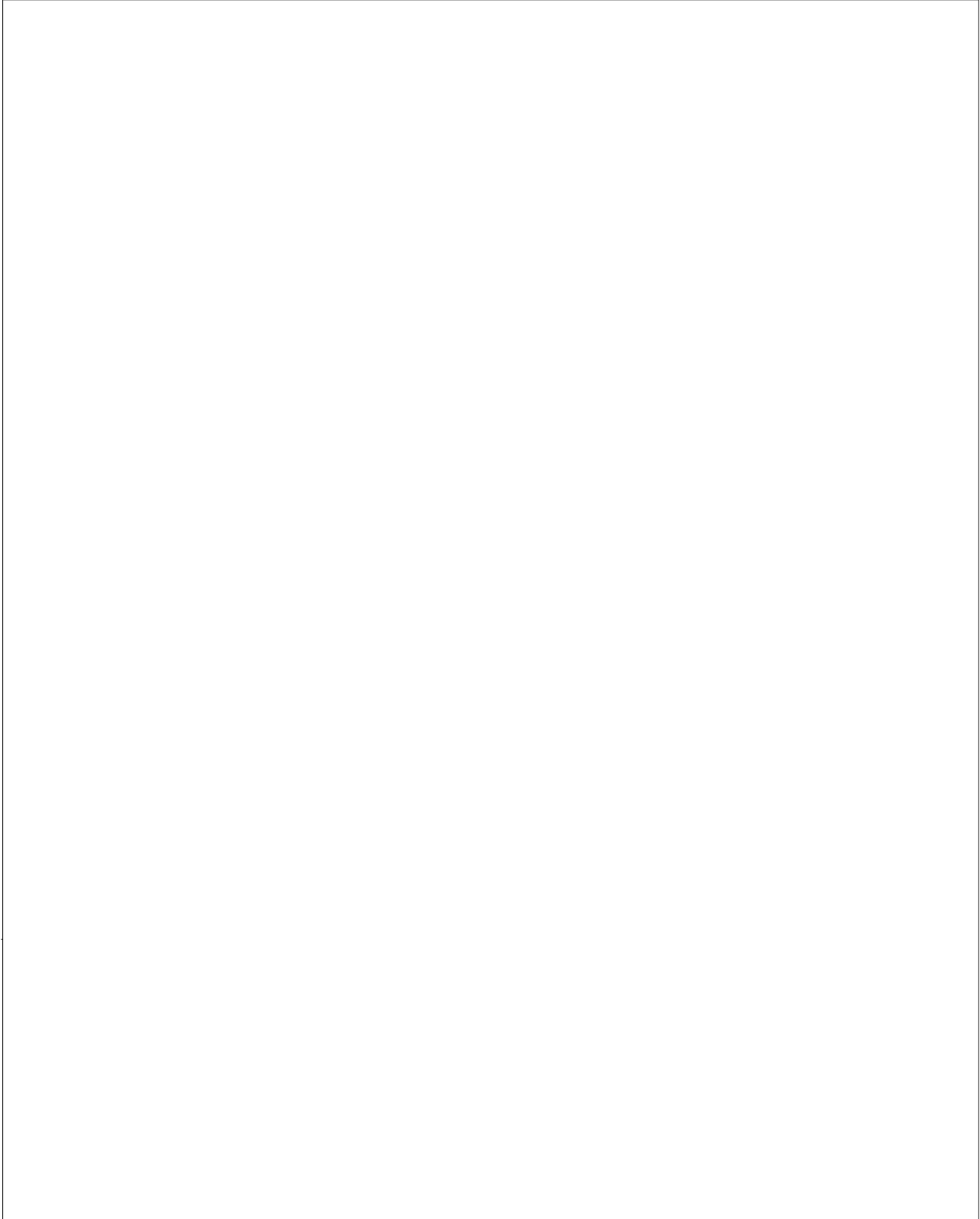
- (U) This recommendation will remain open until the reinspection is complete.

**CIA Response:**

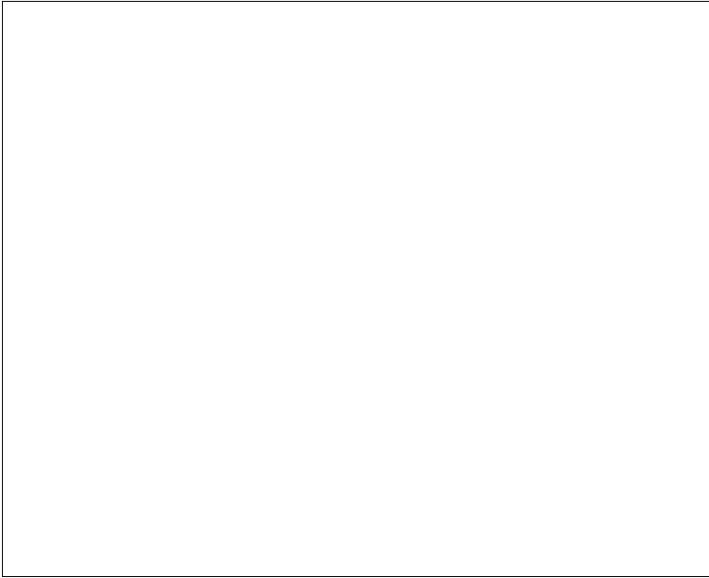
(U) David Spohn, Space and Security Management Division, reinspected the Agency Records Center (ARC) on 7 July 2004 and found that it is compliant with NARA's records center requirements.

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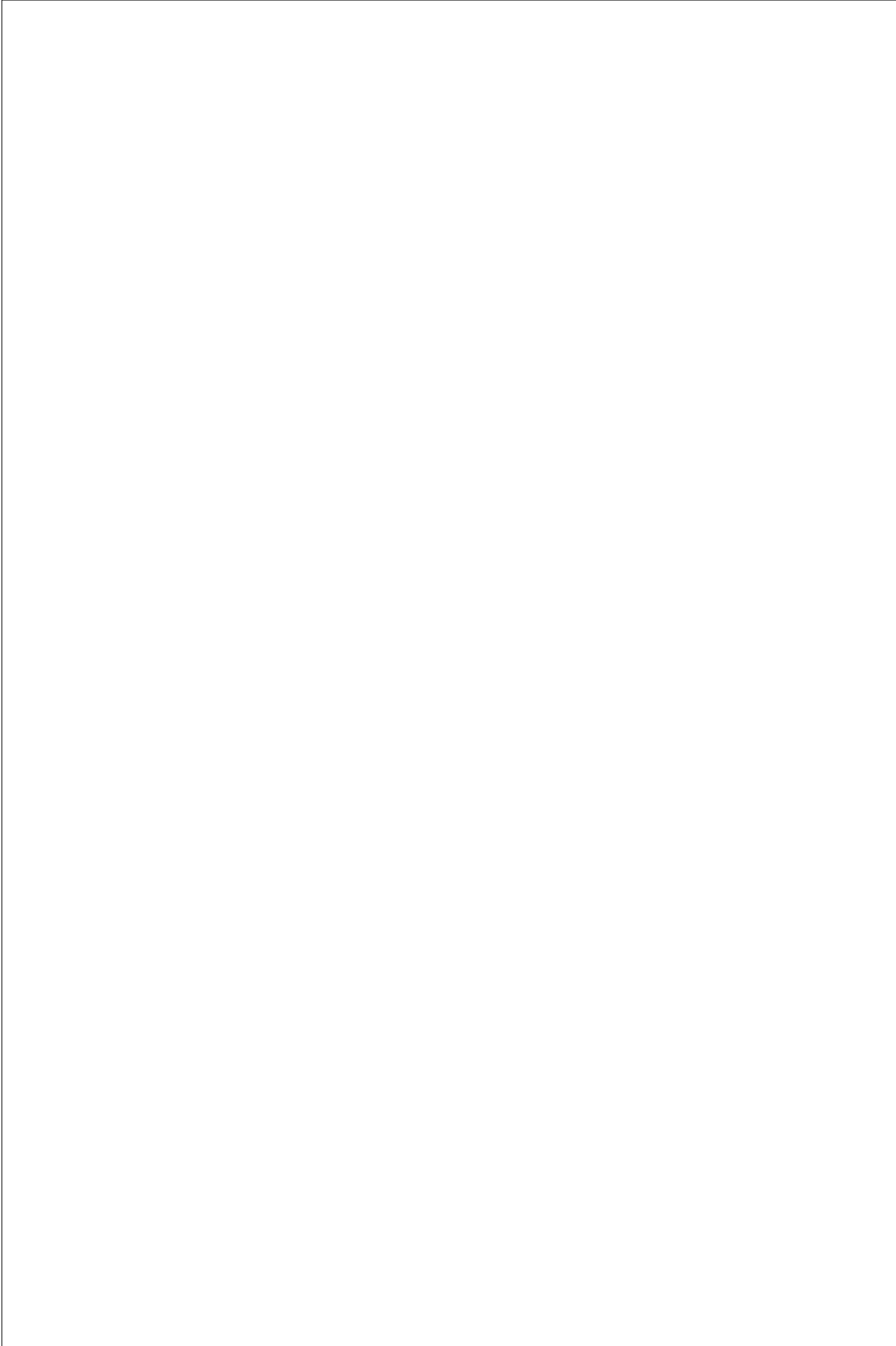




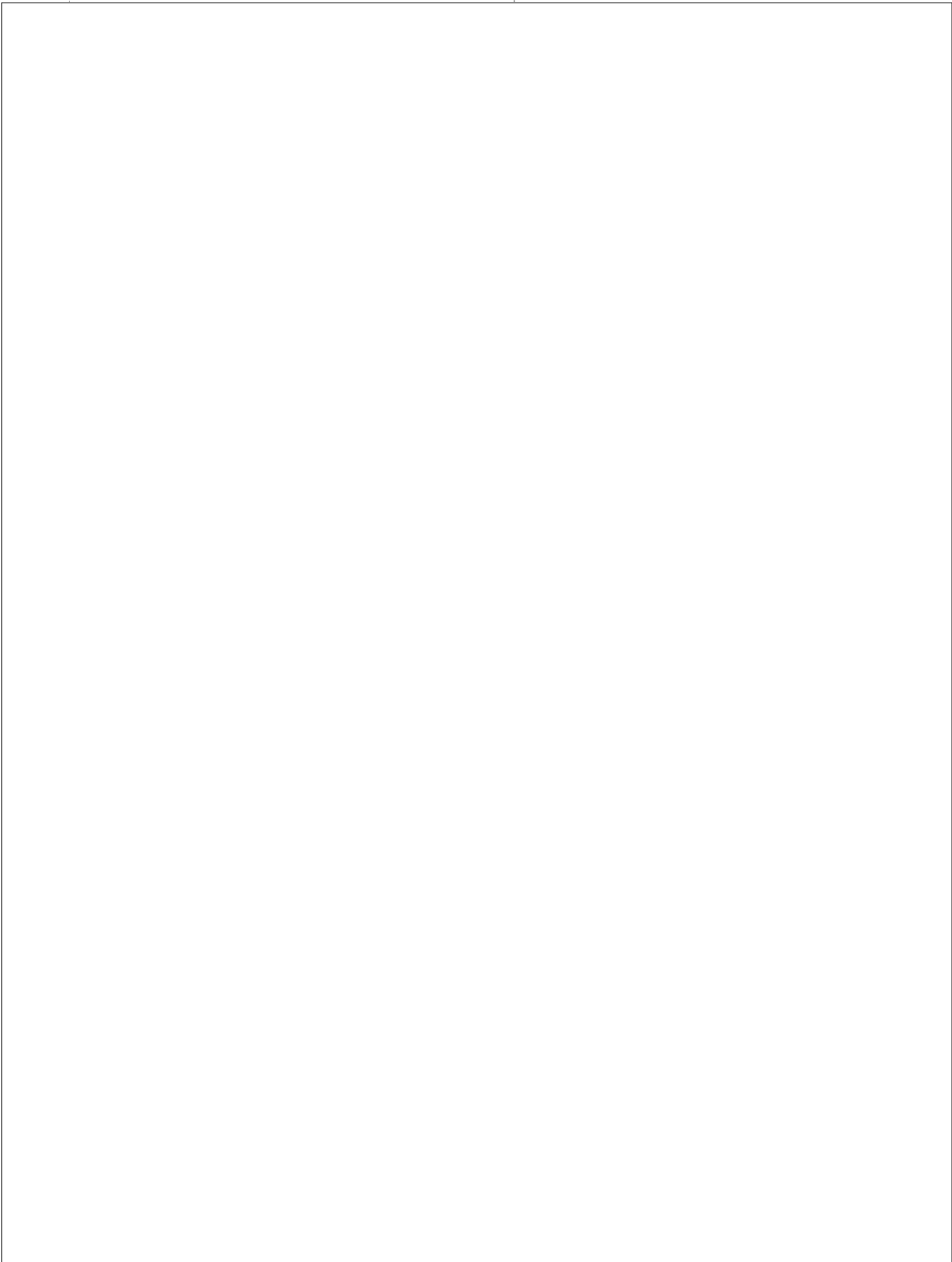
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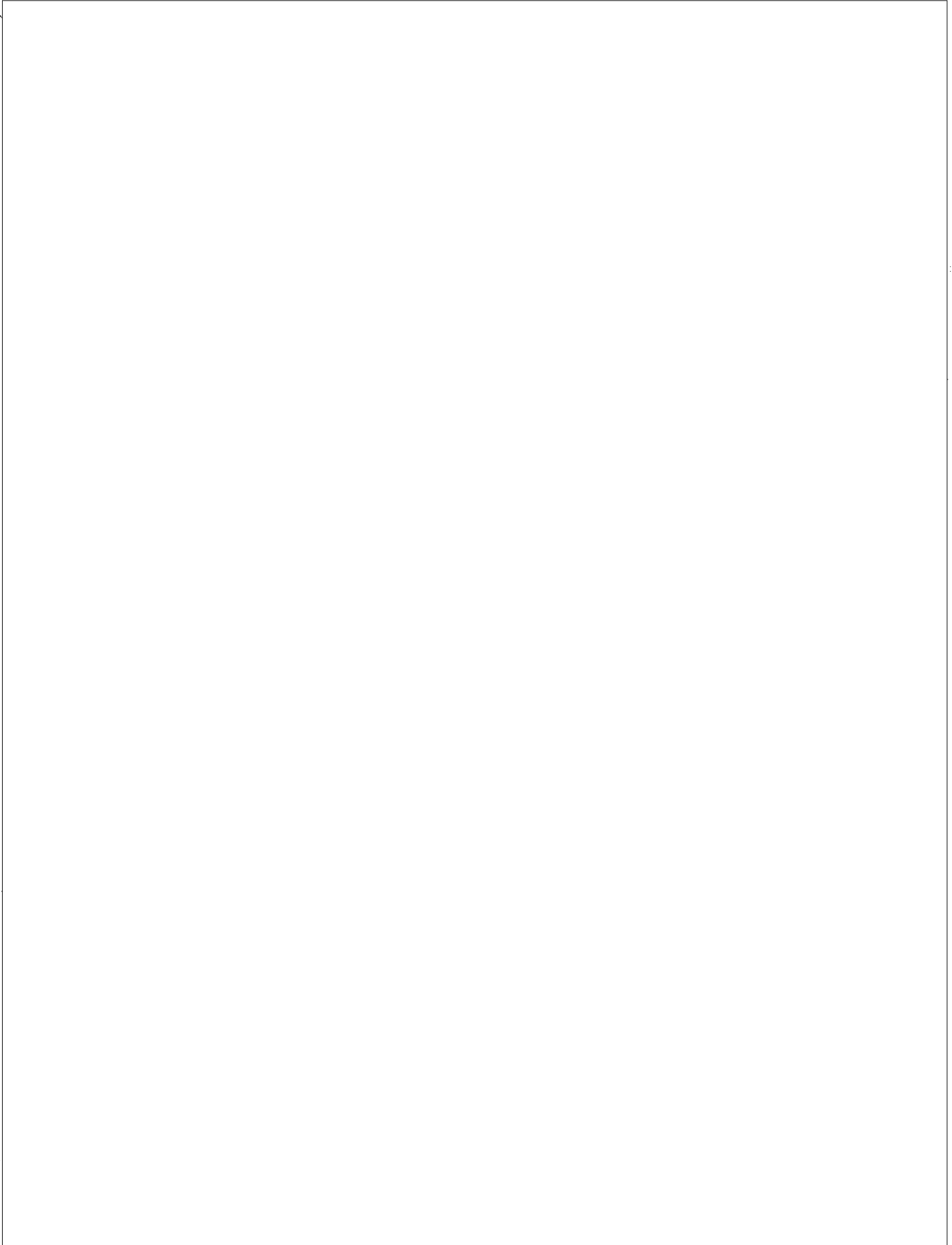


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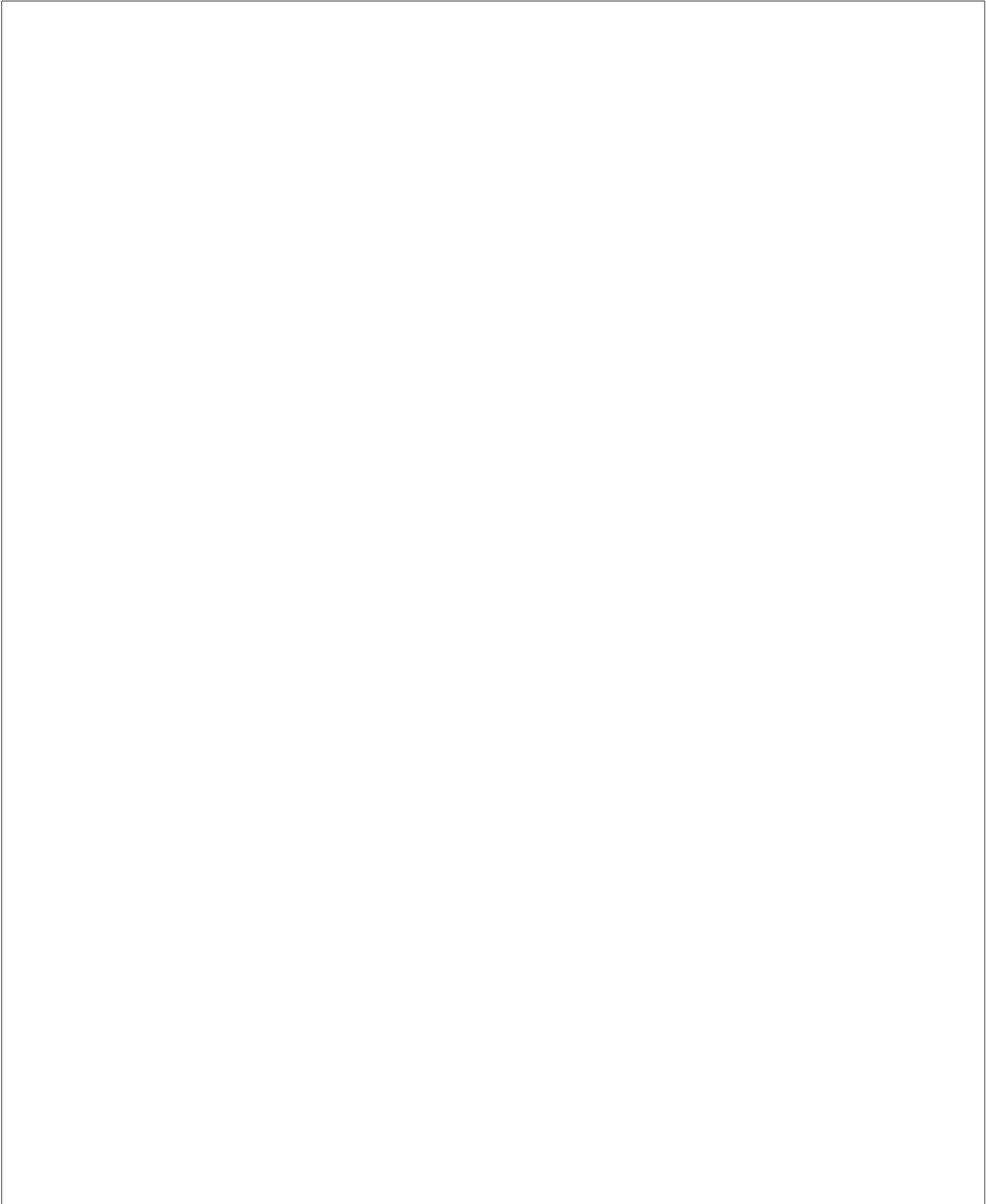




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