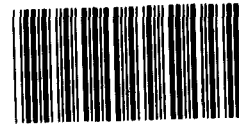


May 1992

DOE MANAGEMENT

Better Planning Needed to Correct Records Management Problems



146802

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RELEASED

**Resources, Community, and
Economic Development Division**

B-246664

May 8, 1992

**The Honorable John Glenn
Chairman, Committee on
Governmental Affairs
United States Senate**

Dear Mr. Chairman:

You requested that we review the status of the Department of Energy's (DOE) actions in response to a December 1988 National Archives and Records Administration (NARA) evaluation of DOE's records management program.¹ NARA's evaluation identified major problems with DOE's management of the records program that caused serious shortcomings in every phase of the records' life cycle—from creation and maintenance through retention and disposal. You were concerned that these problems could seriously limit the ability of DOE to, among other things, adequately document its programs' policies, decisions, and actions and locate records needed to conduct important studies, such as those involving information on the health and mortality of its workers. Consequently, we agreed with your office to identify (1) the potential impact of the deficiencies NARA identified on the Department's operations, (2) the actions DOE has taken in response to NARA's evaluation, and (3) the additional actions DOE should take to improve its responsiveness to NARA's recommendations.

Results in Brief

NARA made over 30 specific recommendations regarding all phases of DOE's records management at all levels of DOE's operations.² For example, NARA found that the Department's documentation practices were inadequate and cited the congressional criticism DOE received when its managers inadvertently destroyed certain working papers relating to a decision on the selection of a nuclear waste storage site. As a result, NARA recommended that DOE require that its managers develop specific descriptions of the types of records they need to document their program decisions and activities. However, we found that DOE continues to experience problems documenting its program decisions and activities. For example, 2 years after NARA made this recommendation, DOE's Inspector General reported that DOE facilities were not in compliance with environmental training requirements because, among other things, none of the seven DOE contractors the Inspector General visited maintained

¹Evaluation of the Records Management Program of the Department of Energy (Dec. 1988).

²See appendix I for a complete list of NARA's specific recommendations and their status.

adequate documentation and recordkeeping systems for hazardous waste training.

DOE did not take action on NARA's recommendations for over a year primarily because of insufficient staff and high turnover in its Records and Reports Management Branch, which, as part of the Department's organization for managing information resources, is responsible for overseeing DOE's records management activities. Since May 1990, DOE has acted on some of NARA's recommendations. For example, it has realigned the Records and Reports Management Branch, increased the staff and resources assigned to the branch, and increased communications between the branch and the field office records officers. Also, DOE is revising its records management orders to include changes that NARA recommended, although it does not expect to issue most of these final orders until after May 1992. In addition, some DOE field office and contractor records officers have improved various aspects of their individual records management activities.

After issuing its revised records management orders, DOE will need to take a number of actions to address the remaining NARA recommendations. Specifically, DOE has to implement adequate documentation practices and train employees at all levels of its operations. DOE also has to perform comprehensive inventories of all its records, develop new disposition schedules for these records, and establish procedures to prevent records from being removed or destroyed when employees leave the Department or its contractors. Despite all that remains to be done, the Department has not developed plans or set specific target dates to ensure that its line managers and contractors complete all the actions necessary to respond to NARA's concerns.

Background

Responsible for all major federal energy functions, including the expansive nuclear weapons complex, DOE manages, and its contractors create, some of the most important and extensive scientific and technical information in the world. For example, DOE maintains records on the development of the first nuclear bomb, as well as a massive collection of records on its workers' exposure to radiation. Because of the importance of the records generated by its facilities and the decentralized nature of its operation, DOE needs to maintain a high-quality records management program to ensure that its decisions and activities are sufficiently documented, that records are readily retrievable, and that employees understand their records

management responsibilities and do not remove or destroy records without the Department's knowledge and approval.

Records management includes determining what records managers should create and maintain (recordkeeping requirements), what information the records should contain (documentation standards), what records an agency has in its control and where they are located (records inventories), and when an agency should dispose of records or transfer those of historical value to the National Archives (disposition schedules).

Since 1950 the Federal Records Act, as amended, has required agencies to prepare and preserve records that adequately document their organization, functions, policies, decisions, procedures, and essential transactions. To comply with this act, agencies must establish and maintain programs that control the life cycle of their records, that is, records' creation, maintenance, use, disposal, and preservation. NARA helps federal agencies comply with the requirements of the act by (1) setting standards and recommending efficient procedures to control records' life cycle, (2) providing training on effective records management techniques, (3) inspecting agencies' records management practices, and (4) recommending ways for agencies to improve their programs.

DOE operates through an extensive field structure primarily composed of government-owned facilities operated by management and operating (M&O) contractors. As a result, these M&O contractors create and maintain most of DOE's records. In most cases, DOE's field offices oversee the operations of these M&O contractors. Consequently, DOE relies heavily on its field office records officers, who are often assigned other duties and responsibilities that compete for their time, to oversee the management of most of its records program.

DOE's Office of Administration and Human Resource Management has overall responsibility for all the Department's records management functions. Within this office, the Records and Reports Management Branch (1) determines overall records management policy and writes the Department's records management orders, (2) oversees the programs of the field office and headquarters records officers, and (3) coordinates with NARA and other outside agencies on records management issues. The History Division of the Executive Secretariat ensures the preservation of records that have historical value in DOE's headquarters offices.³ Within the

³Headquarters offices" refers to DOE programs at headquarters, such as Defense Programs, Environmental Restoration and Waste Management, New Production Reactors, and Energy Research.

Office of Administrative Services, a single records officer is responsible for managing the records programs for DOE's headquarters offices.

Inadequate Records Management Practices Cause Problems in DOE's Operations

In 1988 NARA evaluated DOE's records management program and found over 30 specific deficiencies. Specifically, NARA found that DOE had given insufficient attention to sound records management principles and practices, especially in the areas of documenting decisions and activities, inventorying and scheduling records, educating its employees, and protecting its records from removal. These problems continue to exist at DOE.

NARA identified DOE's lack of documentation standards and recordkeeping requirements as a cause of why DOE managers destroyed working papers on the selection of a nuclear waste storage site. As a result of destroying these papers, DOE received congressional criticism for inadequate documentation. However, despite the standards implementing the Federal Records Act, which require that agencies sufficiently document their program activities for congressional oversight, and NARA's recommendations, DOE continues to have problems with inadequate documentation by its operating units. For example, in August 1990 our report on DOE's Economic Regulatory Administration's (ERA) handling of a proposed \$713.8 million settlement of a major oil company's oil overcharge litigation disclosed that ERA had little or no documentation for many of the significant events that led to the proposed settlement, including its negotiating sessions and the review by DOE's Office of General Counsel.⁴ In December 1990 DOE's Inspector General reported that DOE facilities were not in compliance with federal and departmental environmental training requirements because, among other things, none of the seven contractors that the Inspector General visited maintained adequate documentation and recordkeeping systems for hazardous waste training.⁵ The Secretary's own Tiger Teams⁶ consistently cite documentation problems with environmental, safety, and health activities at the DOE offices and contractors they assess.

⁴Energy Regulation: Factors Relating to Oil Overcharge Settlements Need Better Documentation (GAO/RCED-90-181, Aug. 23, 1990).

⁵Environment Training at the Department of Energy (DOE/IG-0294, Dec. 1990).

⁶To determine the status of DOE's compliance with environmental, safety, and health (ES&H) regulations, the Secretary of Energy established Tiger Teams in June 1989 to perform detailed ES&H assessments at 35 of DOE's most critical facilities.

DOE also continues to have difficulty locating and retrieving records. NARA cited the time and expense associated with the way DOE dispatched teams to locate records for the numerous lawsuits in which it was involved, because it did not use consistent filing procedures or have comprehensive inventories and current disposition schedules for its records. A more recent example of DOE's difficulty in locating and retrieving records is DOE's proposed effort to identify and locate records needed for epidemiologic and health surveillance studies of the agency's nuclear weapons complex workers. DOE expects this effort will take about 3 years to complete.

Finally, DOE has experienced problems with its managers and scientists commingling DOE records with their personal papers and taking those records with them when they terminate employment. NARA found that DOE had not adequately educated its employees on the need to separate federal records from personal papers or had not taken extra precautions to prevent the removal of DOE records. NARA recommended that DOE implement a training program in order to provide clear, authoritative direction to its line managers and scientists on how it expects them to implement its records management program. At the time of our review, DOE had not conducted such training and had not implemented procedures to preclude the removal or destruction of official records when employees leave the Department or its contractors.

Status of DOE's Response to NARA's Recommendations

For over a year DOE and NARA officials had difficulty agreeing on an acceptable response to NARA's evaluation. Insufficient staff and high turnover in DOE's Records and Reports Management Branch also contributed to this delay. However, since reorganizing its records management branch, DOE has initiated several actions that address some of NARA's concerns about its records management program. Specifically, DOE has

- increased the full-time-equivalent staff assigned to this branch from less than one to five and made more travel and training funds available to the branch staff;
- increased communications with its field office records officers by (1) forming a Records Management Committee comprised of these officers and (2) giving each of them a contact in the branch with whom they can discuss any records management issues that arise;

-
- developed guidelines for evaluating its records management activities and conducted evaluations of records management activities at several of its field offices;
 - drafted revisions to its records management orders to include changes that NARA recommended (DOE issued two orders in October 1991 to address NARA's concerns regarding its vital records⁷ program and expects to issue the other revised orders between May 1992 and late 1993);
 - provided training for its records officers on how to perform comprehensive records inventories and develop new disposition schedules for the records they identify; and
 - directed its offices and contractors in November 1991 to begin inventorying and developing records disposition schedules for its records at each site (DOE's goal for preparing these schedules for all its active records is Oct. 1, 1993, and for all its inactive records, Oct. 1, 1995).

In addition to action by its Records and Reports Management Branch, some DOE headquarters, field office, and contractor records officers have taken individual actions to improve their records management activities. For example, in February 1991 DOE's Assistant Secretary for Nuclear Energy issued specific recordkeeping requirements for the training, qualification, and certification records of the operating personnel at DOE nuclear facilities. Also, some DOE headquarters offices have hired experienced records managers to assist them with their individual records programs.

Because of the increased need to maintain and retrieve records for pending litigation at the Hanford site, DOE's Richland Field Office tasked its records officer with improving the records management at the field office and its contractors. With the support of field office management, this full-time records officer and her M&O contractors' records officers agreed on common records management goals for the site, identified priorities, and set specific target dates for completing actions. As a result, in less than 2 years, this field office and its contractors developed contract award fee evaluation criteria, systems for surveillance reviews and for identifying and maintaining vital records, and a data base for maintaining essential information on the nature and location of all their records. In addition, they conducted a comprehensive inventory of all their records holdings and agreed on a common disposition schedule for their records. The field office and its contractors also trained all levels of employees on their records management responsibilities and implemented procedures to

⁷Vital records are essential records needed in case of an emergency or to protect the rights and interests of employees.

prevent the removal of records held by contractor employees when they terminate their employment.

Much Remains to Be Done to Respond to NARA's Concerns

Although DOE's Records and Reports Management Branch has taken steps to improve its overall program management over the past year and a few offices and contractors have made individual efforts to improve their records management activities, many of DOE's line managers and contractors have not completed actions that address the majority of NARA's concerns. In particular, these managers and contractors have not developed recordkeeping requirements for documenting their program decisions and activities. They also have not completed inventories of their records and developed appropriate disposition schedules for them. In addition, these managers and contractors have not trained their employees on their records management responsibilities or implemented procedures to prevent employees from removing federal records when they terminate their employment.

To improve the documentation of its program decisions and activities, NARA recommended, among other things, that DOE revise its records management orders. NARA expected that, in conjunction with issuing these orders, DOE's line managers would implement these orders by developing specific descriptions of the types of records they need to document their program decisions and activities. DOE has drafted a revised records management program order that requires its line managers to develop recordkeeping requirements for their operating units and expects to issue this revised order in the late summer of 1992. However, many of DOE's line managers and contractors have not determined what records they need to adequately document their program decisions and activities, issued specific recordkeeping requirements for these records, or set specific target dates for completing these actions.

NARA's most time-consuming recommendations were that DOE complete comprehensive inventories and develop new disposition schedules for its records at each office and contractor. NARA recommended such actions so that DOE could (1) identify and locate those records it currently maintains, (2) determine which records it needs to retain and for how long, (3) discard outdated and unnecessary records, and (4) transfer records requiring longer retention to the federal records centers for storage or to the National Archives for historical preservation. In November 1991, DOE issued a memorandum requiring each office and contractor to develop new disposition schedules. Recognizing that the actions needed to

implement these NARA recommendations are extensive and time-consuming, DOE trained its records officers in how to conduct inventories and develop new records disposition schedules and set a goal in November 1991 of 2 to 4 years to complete this project.

A third area of concern to NARA involved DOE's lack of training for line managers and scientists on their records management responsibilities, especially the issue of separation of official records and personal papers. DOE is revising its files management order to include information on the handling of official records and personal papers but does not expect to issue this revised order until the end of fiscal year 1992. In addition, the Department's Records Management Committee has discussed the training issue for line managers and scientists and decided to conduct a conference for scientific and technical staff, but at the time of our review, the conference had not yet been held. Also, the Records and Reports Management Branch has approached DOE's Employee Development and Training Division about including records management training modules in program management courses for DOE's line managers, but the training division has not yet included these modules in any of its management courses. Furthermore, DOE has not set priorities or target dates for completing these actions.

Finally, NARA suggested that DOE take extra precautions to ensure that employees do not remove or destroy records when they terminate their employment. We found a few contractors that have implemented some procedures for records at employee separation. For example, a contractor at the Hanford site does not allow its employees to maintain personal papers at work, and no employee can receive a final paycheck until he or she has been cleared by the site's records office. In addition, we discussed with both the Chief of DOE's Records and Reports Management Branch and the DOE Historian the feasibility of including records officers in the formal separation process for employees. These DOE managers have begun discussing the option of instituting formal entrance and exit conferences with scientific and technical staff. While these individual actions are encouraging, DOE has not decided what procedures its line managers can implement that will adequately protect its records and when it wants these procedures implemented departmentwide.

Better Planning Would Improve DOE's Responsiveness

While DOE has made some improvements, it has not developed plans for how it will address the remaining concerns NARA raised about its records management program. Without plans that contain specific goals and benchmarks for measuring accomplishments, DOE may never complete all

the actions NARA recommended and may continue to have problems documenting its program activities and decisions and locating and retrieving its records. DOE may also continue to have problems with employees' removing or destroying its records. The results achieved by DOE's Richland Field Office in less than 2 years demonstrate the importance of delineating specific goals, priorities, and target dates to accomplish program improvements.

According to the Chief of DOE's Records and Reports Management Branch, the Department expresses its records management goals and priorities through the orders the Records and Reports Management Branch issues and through the semiannual Records Management Committee meetings. However, the Department will not issue many of its revised records management orders until after May 1992, and because of the general nature of orders, these documents do not provide enough guidance for the Department and its contractors' line managers to determine what priority they should place on completing the actions that will satisfy NARA's concerns. Also, the Committee meetings function more as a vehicle for field office input into the Department's program than as a forum for delineating the Department's goals and priorities.

The Chief of DOE's Records and Reports Management Branch also said that the branch evaluates the actions DOE's headquarters and field office records officers have taken by the reviews it conducts every 3 years, thereby relaying the Department's goals and priorities and ensuring that the program is adequately implemented at DOE's headquarters and field offices. During these reviews, the branch assesses the records management practices of the DOE headquarters and field office records officers, as well as how well these records officers have evaluated the DOE and contractor records management programs under their purview. Under these procedures, until the Records and Reports Management Branch completes the initial cycle of these reviews in late 1993, it will not know if these programs have been adequately implemented and what actions its line managers still have to take to satisfy NARA's concerns.

During our review, we spoke with the four DOE field office records officers who oversee most of the records generated by DOE's nuclear weapons complex. All of them told us that they welcome and appreciate the increased communication DOE's Records and Reports Management Branch now has with them. However, most of the records officers expressed frustration that their work load had substantially increased as a result of this increased communication but without a concurrent increase in their

resources. In addition, despite the increased communication and semiannual meetings, they do not have a clear understanding of the goals and priorities of the Department's records management program.

Conclusions

In addition to following through on the actions it has already begun, such as issuing revised records management orders, DOE still has much to do to adequately respond to NARA's evaluation. While DOE has taken action at the departmental level to improve its records management program, many of its headquarters and field office managers and contractors face years of work to complete actions that fully respond to NARA's recommendations. In particular, these managers and contractors must, among other things, (1) develop recordkeeping requirements for program activities, (2) complete comprehensive inventories and develop new disposition schedules for the records, (3) train employees on their records management responsibilities, and (4) implement procedures to prevent the loss or destruction of records when employees leave.

DOE's response to NARA has primarily involved those actions that the Records and Reports Management Branch could accomplish. DOE now faces the task of implementing significant changes in the way its line managers and contractors handle their records management responsibilities; however, it does not know how these managers and contractors plan to accomplish these changes. We believe a project of this magnitude in an agency as diverse and extensive as DOE requires explicit goals, priorities, and direction from top management to ensure that line managers and contractors complete the actions needed. A project of this magnitude also requires specific target dates for accomplishing these actions based on an assessment of the amount and location of work remaining.

Recommendations

We recommend that the Secretary of Energy direct the head of each headquarters and field office to develop a plan for correcting the remainder of the deficiencies that NARA found in the Department's records management program. These plans should include specific priorities, goals, and target dates for correcting the deficiencies noted in the NARA evaluation and should identify the amount of work remaining at each headquarters, field, and contractor office. In addition, the Secretary should direct DOE's Records and Reports Management Branch to provide guidance on the plans' development, review these plans, and monitor their

implementation until the Department has fully responded to NARA's concerns.

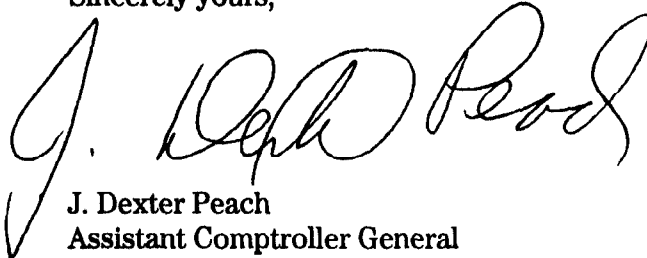
As requested by your office, we did not obtain written agency comments on a draft of this report. However, we discussed the facts presented in the report with DOE program officials, and we have incorporated their comments where appropriate.

We performed our review between October 1990 and December 1991 in accordance with generally accepted government auditing standards. We talked with DOE officials responsible for records management programs at the Records and Reports Management Branch, headquarters, field offices, and contractors. We obtained and discussed, with NARA and DOE officials, DOE's status reports to NARA and other supporting documents. (App. II provides further details on the scope and methodology of our work.)

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will provide copies to the Secretary of Energy and the Director, Office of Management and Budget. Copies will be sent to other interested parties upon request.

This report was prepared under the direction of Victor S. Rezendes, Director, Energy Issues, who may be reached at (202) 275-1441. Other major contributors to this report are listed in appendix III.

Sincerely yours,



J. Dexter Peach
Assistant Comptroller General

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Abbreviations

ADP	automatic data processing
CIC	Coordination and Information Center
DOE	Department of Energy
ERA	Economic Regulatory Administration
ES&H	environmental, safety, and health
FRC	federal records center
IRM	information resources management
LANL	Los Alamos National Laboratory
M&O	management and operating
NARA	National Archives and Records Administration
OIRM	Office of Information Resources Management Policy, Plans, and Oversight
OSTI	Office of Scientific and Technical Information

NARA Recommendations and Status of DOE Actions

No.	NARA recommendations	DOE status
Overall program management:		
1-1	Review Department of Energy (DOE) Order 1324.5 and associated functional statements and delegations of authority to determine if the assignment of records management responsibilities provides an adequate framework for the development and implementation of an active, effective records management program.	DOE states action is complete. Actions taken include reorganizing the records management branch functions and concluding that no further changes are needed. DOE is revising its overall Order 1324.5A to reflect this change and expects to issue it in late spring of 1992.
1-2	Enlarge the Information Management Branch to provide sufficient personnel to develop and maintain a records management program that meets the needs of DOE and complies with all statutory requirements, and to permit early involvement in the development of information systems and of program initiatives with records management implications.	DOE states action is complete. Actions taken include (1) reorganizing the Records and Reports Management Branch under the Office of Information Resources Management Policy, Plans, and Oversight (OIRM); (2) realigning certain branch functions; and (3) increasing the full-time equivalent staff assigned from less than one to five.
1-3	Improve communication between the headquarters and field operations in matters relating to records management to promote consistent and efficient policy development and operational implementation.	DOE states action is ongoing. Actions taken include: 1. Establishing a Records Management Committee consisting of representatives from each DOE field office. This committee met twice in 1991 and plans to meet twice a year thereafter. It serves as a policy sounding board and advising committee to DOE on records management. 2. Integrating records management into the information resources management (IRM) long-range planning process. During the 1991 cycle, information was collected on planned records facilities upgrades and records management training activities. DOE plans to use this process as a vehicle for obtaining pertinent information. 3. Publishing several articles on records management and electronic forms in a quarterly DOE IRM newsletter. 4. Assigning staff in the Records and Reports Management Branch as contact points for specific field offices in order to increase headquarters-field office communications. 5. Distributing National Archives and Records Administration (NARA) bulletins, policy letters, final rules, General Records Schedule issuances, and other pertinent information of interest to field organizations to make them aware of new requirements and their implementing responsibilities.
1-4	Review DOE Orders 5700.6B and 1430.1A and any other similar orders to ensure consistency with related records management directives.	DOE states that action is complete on DOE Order 1430.1A. DOE Order 5700.6B has been revised and the Records and Reports Management Branch submitted comments to clarify differences in "Quality Assurance Program Requirements for Nuclear Facilities" and NARA's regulations. The branch plans to monitor the implementation of its comments in this new order.

(continued)

**Appendix I
NARA Recommendations and Status of DOE
Actions**

No.	NARA recommendations	DOE status
1-5	Develop and implement a records management training program for the various groups within the agency, including contractor personnel, who are involved with records, particularly records management staffs, program managers, automatic data processing (ADP) personnel, secretaries, and clerks.	DOE states that action is ongoing. DOE's position is that each site has fundamental responsibility for developing and providing adequate and regular records management training. A memorandum is being prepared for distribution to ensure understanding of this responsibility and the requirements of 36 C.F.R. 1222.20(b)(5). In addition, the revision of DOE Order 1324.5, Records Management Program, sets forth the policy and responsibilities in this regard. The branch coordinated with NARA to provide four regional sessions of scheduling and disposition training for headquarters, field office, and contractor sites. The branch has also asked DOE's Employee Development and Training Division to include briefing information on records management in its "Program Management" and "Project Management" courses. This division has suggested that the branch consider a videotape but has not agreed to include records management material in its courses. DOE told NARA that it would have difficulty developing generic training beyond regulations and basics. NARA officials believe that DOE should provide a clear and authoritative direction to its employees about their records management responsibilities through a strong training program.
1-6	Develop and implement a comprehensive records management evaluation program that provides for regular reviews of departmental offices and agency contractors.	DOE states that action is complete. DOE's policy makes field offices responsible for reviewing their own records management operations and those of their management and operating contractors. Actions taken include integrating and institutionalizing departmental records management evaluations within the Office of Information Resources Management review program. These reviews are scheduled such that every field office is evaluated once every 3 years. These reviews will assess how well field offices are fulfilling their records management responsibilities, including reviews of subordinate activities, and appropriate recommendations made to correct deficiencies. In fiscal year 1991, four reviews were scheduled and conducted.
Records creation and maintenance:		
2-1	Require that all departmental elements issue specific recordkeeping requirements for their assigned missions and functions.	DOE states that action is ongoing. Actions taken include revising and combining material into a comprehensive directive in accordance with 36 C.F.R. 1222. This revised order requires all departmental elements to develop specific implementation guidance and issue additional directives, if appropriate. DOE expects to issue the revised order 1324.5A in late summer of 1992.
2-2	Revise appropriate records management directives to incorporate the minimum documentation standards outlined in 36 C.F.R. 1222.20.	DOE states that action is ongoing. Actions taken include those mentioned above, that is, a revised order DOE expects to issue in late spring of 1992.

(continued)

**Appendix I
NARA Recommendations and Status of DOE
Actions**

No.	NARA recommendations	DOE status
2-3	Issue updated guidance explaining that working papers should be handled as agency records whenever they are needed to document agency policies and activities.	DOE states that action is ongoing. Actions taken include those mentioned above, that is, a revised order DOE expects to issue in late spring of 1992. In addition, the branch sent a memorandum on this issue to its records officers in May 1991.
2-4	Undertake a special program to educate DOE scientists about the need to create and maintain records documenting important research and development activities and the requirement to handle them as federal records, not personal papers.	DOE states action is ongoing. Actions taken include planning to issue policy guidance in a revised order and discussing a DOE-wide records management conference, which would include a concentration in this matter. Also, DOE officials are exploring options of formal entrance and exit conferences with scientific and technical staff and including records management presentations on agendas of DOE's scientific and technical conferences.
2-5	Reexamine the subject classification system to modify it as necessary and make its use mandatory throughout the Department.	DOE states that action is complete. Actions taken include requesting written advice on this issue from the Records Management Committee. A consensus was not achieved, and the issue has been held in abeyance and will be revisited later. GAO Note: Given that action has been deferred to a later date, we would not agree that action is complete on this recommendation.
2-6	Combine all files management procedures and instructions into a single DOE order that addresses all records media and all quality assurance requirements.	DOE states that no further action will be taken. DOE has reexamined its position and determined that no net gain would be achieved by pursuing this recommendation.
2-7	Direct offices using office automation to specify the manner and medium in which the records will be maintained to meet administrative, legal, and research purposes and revise DOE Order 1324.6 accordingly.	DOE states that action is ongoing. Actions taken include revising DOE Order 1324.6, Electronic Records, as well as other records management directives. DOE expects to issue these new orders in late spring of 1992.
2-8	Undertake a records management study of the handling of computer files. The study should result in updating all pertinent DOE orders, particularly DOE 1330.1A, to incorporate general records management guidance and the relevant portions of NARA's regulations. The study should also examine ways to improve communications between records management and ADP management officials.	DOE states that action is ongoing. Actions taken include completing a study of the handling of computer files as they relate to DOE Order 1330.1C. DOE determined that no changes are needed. As a result, a records management questionnaire was developed for use during IRM reviews of information systems. The Records and Reports Management Branch continues to review all draft orders that it sees for possible records management guidance.
2-9	Examine microfilming operations to eliminate duplication of effort, particularly at the Energy Information Administration and the Office of Scientific and Technical Information (OSTI), and to ensure that no permanent or unscheduled records are destroyed after microfilming without NARA approval.	DOE states that action is complete. Actions taken include DOE's determination that no duplication exists and no further action is necessary.
2-10	Issue specific guidance on the creation and maintenance of audiovisual records that incorporates the requirements of NARA's regulations published in 36 CFR 1232.	DOE states that action is ongoing. Actions taken include DOE's Records and Reports Management Branch assuming responsibility for this matter. It expects to issue a directive in fiscal year 1993.

(continued)

**Appendix I
NARA Recommendations and Status of DOE
Actions**

No.	NARA recommendations	DOE status
2-11	<p>Implement fully the requirements of DOE Order 5500.7A by:</p> <ul style="list-style-type: none"> a. Appointing vital records program officers throughout DOE. b. Providing vital records program officers with necessary training. c. Identifying and inventorying all departmental records that fall under the definition of vital records. d. Transferring vital records to off-site storage facilities maintained by DOE (for emergency operating records) or federal records centers (FRCs) (for rights and interests records). e. Conducting annual reviews to ensure that records selected for protection as vital records are current, complete, adequately protected, and immediately usable. 	<p>DOE states that action is ongoing. Actions taken include the determination that DOE Order 5500.7A should be split into two orders: (1) Emergency Operating Records (DOE Order 5500.7B) and (2) Rights and Interests Records (DOE Order 1324.8). Both revised orders were issued concurrently in October 1991.</p>
Records disposition:		
3-1	<p>Develop revised disposition schedules that accurately describe the records maintained in all DOE offices and contractor facilities. In developing these schedules priority should be given to electronic records and the records of national laboratories.</p>	<p>DOE states that action is ongoing. Actions taken include:</p> <ol style="list-style-type: none"> 1. Determining that inventories and schedules of records should be done on a site-specific basis. 2. Conducting four regional training courses on inventorying and scheduling records in 1991 for headquarters, field office, and contractor records management personnel. 3. Getting NARA approval for a schedule of permanent research and development project case files. 4. Sending draft site-specific schedules from the Pittsburgh Naval Reactors Office and the Nevada Operations Office to NARA for review and comment. 5. Directing all DOE offices and contractors to begin developing new records schedules for each site on November 12, 1991. DOE's goal for completing this project is 2 years for active records and 4 years for inactive records.
3-2	<p>Implement procedures for involving field personnel in the preparation of revised records schedules. Such a program will require extensive training and regular evaluations by experienced staff.</p>	<p>DOE states that action is ongoing. Actions taken include involving the Records Management Committee in the records scheduling decision. Also, DOE arranged for NARA to conduct four regional training sessions on how to develop disposition schedules.</p>
3-3	<p>Develop and implement a program for periodically reviewing and updating disposition authorities to ensure their accuracy.</p>	<p>DOE states that action is ongoing. DOE plans to wait until its site-specific schedules are completed (Oct. 1, 1995) to begin to look at ways to improve and update schedules.</p>
3-4	<p>Develop and implement procedures for the accurate and comprehensive preparation and updating of the records inventory and disposition schedules by all offices.</p>	<p>DOE states that action is ongoing. As above, DOE plans to wait until its scheduling project is complete to determine what its procedures should be.</p>
3-5	<p>Identify and transfer inactive departmental and contractor records, both in offices and storage areas, that are eligible for storage in the FRCs.</p>	<p>DOE states that action is ongoing and that actions began on this recommendation in fiscal year 1989, soon after the NARA evaluation. In addition, a memorandum to headquarters and field offices in October 1990 reaffirmed the need to identify, schedule, and transfer inactive records.</p>

(continued)

**Appendix I
NARA Recommendations and Status of DOE
Actions**

No.	NARA recommendations	DOE status
Records storage facilities:		
4-1	Upgrade all records storage facilities to meet the facility standards in 36 C.F.R. 1228.222.	DOE states that action is ongoing. Actions taken include soliciting information from field offices and contractors on the extent of noncompliance, plans for or barriers to upgrading facilities, and budgeting details for fiscal year 1993 Information Technology Resources long-range site plans. Individual programs continue to request budget funds based on their overall needs and priorities. The Records and Reports Management Branch developed a summary of these responses in December 1991 for upgrading storage facilities and tracking their status through records management reviews and the long-range budget plans. OIRM will also support justifiable budget requests to upgrade facilities.
4-2	Transfer to FRCs or the Office of the National Archives all records that have been or are scheduled to be maintained in records staging or holding areas for more than 5 years.	DOE states that action is ongoing. Actions taken include issuing a memorandum to headquarters and field offices supporting NARA's recommendation. Responses indicate that action was being taken and will be ongoing to either transfer long-term records or submit requests to retain them in DOE records-holding areas.
4-3	In those instances where it is not possible to transfer long-term records to FRCs, submit a request to NARA to maintain long-term records in records-holding or staging areas.	DOE states that action is ongoing. Actions taken include those mentioned above. In addition, the Records and Reports Management Branch has received such requests and after review will forward them to NARA for approval. Resolution of the FRC security facilities issue should eliminate the need to maintain long-term records at DOE holding areas.
Retained records:		
5-1	Transfer the following records maintained by the Office of the Executive Secretariat, History Division, to NARA in fiscal year 1989: a. The first segment of the Atomic Energy Commission Secretariat Records dating from 1947 to 1951. b. The large collection of 7,000 still photographs dating back to the same period.	DOE states that action is ongoing. The first segment of Atomic Energy Commission records is in the process of being inventoried and declassified. DOE anticipates transferring them to NARA in late 1994. The collection of still photographs was transferred.
5-2	Schedule the records holdings of the Executive Secretariat, History Division, and work with NARA to develop a plan for transfer of additional holdings to NARA over an agreed-upon period of time, such as the next 5 years.	DOE states that action is ongoing. The headquarters records officer approved 19 records schedules for these records on September 25, 1991, and forwarded them to the Records and Reports Management Branch for review. This branch sent these schedules to NARA for approval on November 1, 1991. Also, DOE transferred several less significant collections to NARA in 1990. DOE states it is using many of the remaining records in various litigations and expects to transfer them in about 6 years.
5-3	Institute a policy that the Coordination and Information Center (CIC) collect only copies of federal records so the original series will remain intact.	DOE states that action is complete. DOE reviewed the recommendation, found such a policy already existed, and determined no further action is required.
5-4	Schedule the CIC records, including all indexes, for transfer to NARA.	DOE states that action is ongoing. Actions taken include a draft request to NARA for records disposition authority in January 1991. NARA comments were received, and the schedule was redrafted and submitted to NARA in September 1991.

(continued)

**Appendix I
NARA Recommendations and Status of DOE
Actions**

No.	NARA recommendations	DOE status
5-5	Inventory and schedule all collections of records assembled for litigation purposes. Consider the eventual integration of the records appraised as permanent into the CIC in order to ensure long-term preservation and availability.	DOE states that action is ongoing. Actions taken include sending a memorandum to headquarters and field offices that directed them to comply with this recommendation.
5-6	Use "A Guide to Archival Collections Relating to Radioactive Fallout from Nuclear Weapons Testing" to start inventorying and scheduling other records in DOE custody relating to nuclear weapons testing and fallout.	DOE states that action is ongoing. Actions taken include sending a memorandum and a copy of the guide to headquarters and field offices and requesting that they identify and begin scheduling records currently in their custody. Progress to be monitored through records management reviews.
5-7	Schedule the silver master microfilm (and a diazo copy) of the unclassified collection of technical reports at OSTI for transfer to NARA at regular intervals. Make a cut-off and initial transfer in the near future. Separately schedule the security classified part of OSTI's collection and the electronic material that supplements, enhances, and provides access to the entire collection.	DOE states that action is ongoing. Actions taken include OSTI preparing a records schedule standard for unclassified scientific and technical reports and submitting this to NARA in May 1991. DOE expected to submit an additional records schedule standard for security-classified records in September 1991; however, it is waiting for NARA to respond to the unclassified schedule first.
5-8	Schedule the Naval Petroleum Reserves No. 1 records stored on site and in FE-44 office space.	DOE states that action is ongoing. Actions taken include inventorying records and developing disposition schedules, which DOE anticipates submitting to NARA in the spring of 1992.
5-9	Schedule and, as appropriate, designate for transfer to NARA the records of the Los Alamos National Laboratory (LANL) laboratory director, the photographic collection, and the designated archival collection.	DOE states that action is ongoing. Actions taken include LANL implementation of a computer-based records management system. As part of this implementation, LANL expects to inventory and schedule its research and development records by the end of 1992. DOE expects to transfer these records to NARA in 1998.
5-10	Inventory and schedule the remaining older records identified in this section of the report as well as all other collections of unscheduled holdings within departmental and contractor offices and storage space.	DOE states that action is ongoing. DOE anticipates that this effort will be carried out in conjunction with other inventorying and scheduling activities (see Item 3-1).

Objectives, Scope, and Methodology

In December 1988, the National Archives and Records Administration reported the results of its evaluation of the Department of Energy's records management program and identified numerous deficiencies in the management of the Department's records program. The Chairman of the Senate Committee on Governmental Affairs was concerned that these deficiencies could seriously limit DOE's ability to document its programs' decisions or locate records needed for important studies. As a result, in September 1990, after DOE's delay in responding to NARA concerns, the Chairman asked us to look into the actions DOE had taken in response to NARA's recommendations and report on the status of DOE's response.

During the review, we focused on developing information on (1) what impact the deficiencies NARA identified have had on DOE's operations, (2) what actions DOE has taken and still needs to take in response to NARA's evaluation, and (3) what improvements DOE could make in the way it corrects the deficiencies NARA identified.

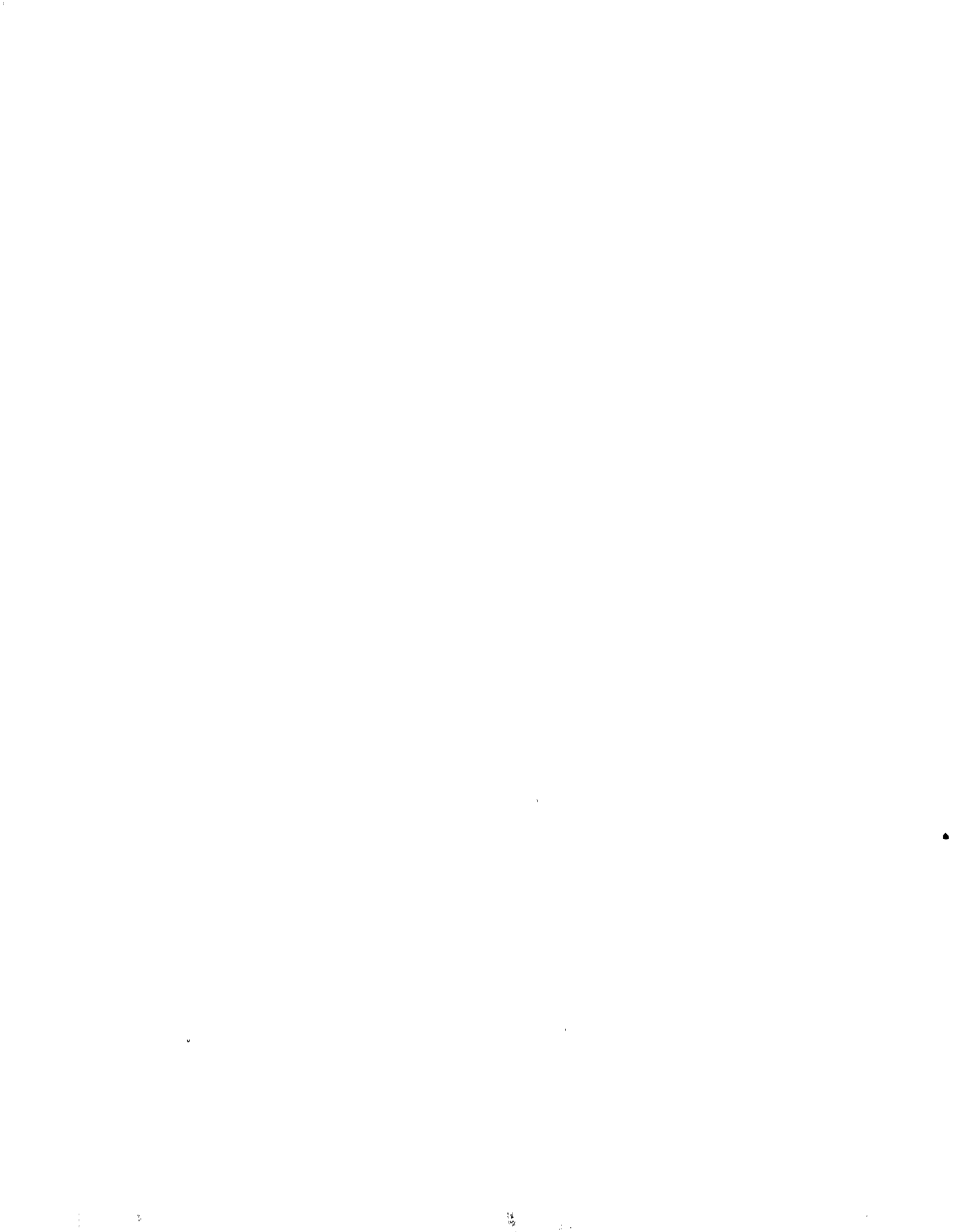
The results of this effort are based on discussions and data obtained from DOE officials in the Offices of Information Resources Management Policy, Plans, and Oversight, Epidemiology and Health Surveillance, Environmental Restoration and Waste Management, Personnel and Career Development, Administrative Services, Organization, Resources and Facilities Management, and the Executive Secretariat at DOE headquarters; DOE field operations offices in Albuquerque, New Mexico; Oak Ridge, Tennessee; Richland, Washington; and San Francisco, California; DOE National Laboratories at Lawrence Berkeley, Los Alamos, Oak Ridge, and Sandia; and DOE contractors at the Inhalation Toxicology Research Institute, the Oak Ridge Associated Universities, and the Stanford Linear Accelerator Center.

The data obtained included DOE orders, policies, plans, and evaluations of records management practices, as well as DOE Office of Inspector General, DOE Tiger Team, and our reports. We discussed DOE's records management processes and problems with DOE, NARA, and DOE national laboratory and contractor officials. Using the information gathered, we assessed the impact DOE's records management practices have had on its operation and the status of DOE's response to NARA's concerns.

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