

A PROGRAM TO SUPPORT AND STRENGTHEN THE NATIONAL ARCHIVES

National Coalition for History¹
Working Group on the National Archives

May 2024

¹ The **National Coalition for History** (NCH) is a consortium of 42 organizations that advocates and educates on federal legislative and regulatory issues affecting historians, archivists, political scientists, documentary editors, teachers, students, genealogists, and other stakeholders. As researchers, teachers, and conservators of American history and culture, we care deeply about the programs and activities of NARA and the NHPRC. www.historycoalition.org

EXECUTIVE SUMMARY

NARA's Critical Importance

The National Archives and Records Administration (NARA) is an institution essential to US democracy and public life.

By preserving, organizing, and describing government records, and helping members of the public access them, NARA and its staff make possible truthful and thorough understandings of our history. A wide range of constituencies all rely on NARA's holdings to explore family and community histories, to track the development of public policies, and to uncover the roots of problems we face today.

NARA is legally mandated to work with federal agencies to declassify government documents in the name of freedom of information and government accountability. In that sense, the agency plays an indispensable role in ensuring government transparency and the public's right to know—foundations of democratic government.

NARA performs a number of additional functions essential to US governance. Veterans rely on the archives for the documentation they need to secure benefits. Federal agencies turn to NARA to understand their own institutional histories. And presidential administrations are required by law to work with NARA to ensure the preservation and availability of presidential records for future generations.

Finally, NARA serves an important economic function as an employer of more than twenty-five hundred staff members at forty-three facilities in seventeen states and Washington DC. Every government official concerned with the future of secure, well-paying employment in the United States has an interest in seeing that the National Archives is properly funded and adequately staffed. As workers in the cultural heritage field and academia have seen firsthand, staff are the lifeblood of the institution. NARA staff make primary sources accessible to students and teachers. Archivists conduct research consultations with members of the public whose questions require deep knowledge of vast holdings spanning hundreds of years of history. Curators produce exhibits and publications that bring the past to life, while processing staff strive to make records accessible. Conservators ensure the survival of fragile documents, maps, photographs, and films. Cafeteria, maintenance, and security staff provide a safe and comfortable space. NARA's staff work with every division of the federal government to ensure that physical and digital materials are preserved, scheduled, transferred, and declassified as legally mandated, often while facing the herculean task of organizing materials that arrive in disarray.

Acute and Growing Needs

Funding for staff, technology, and infrastructure

Despite NARA's critical responsibilities, and the dramatically growing volume of holdings it is mandated to preserve, the agency is operating without adequate funding, staffing, technology, and infrastructure. NARA's budget has stagnated in real terms over the last three decades, even as the agency has received an avalanche of new materials to manage.² NARA advocates were encouraged that Congress authorized a 10 percent budget increase for FY 2023. But high rates of inflation, coupled with the fact that NARA's budget declined in both real and nominal terms in FY 2020, meant the FY 2023 increase would allow the institution merely to tread water.

Authority over Presidential Libraries

Compounding inadequate funding, NARA's presidential libraries face special problems that derive from their complex relationships with private presidential foundations. These foundations contribute to library endowments and some reach beyond funding into larger areas of activity regarding NARA's expertise. There should be, at least, an attempt to distinguish between the authority of NARA and the foundations.

Cooperation from the Executive Branch

NARA cannot fulfill its mission if the entities that create federal records do not abide by federal records-management laws, regulations, and policies. This is not a recent crisis or a partisan issue, but a systemic problem that requires persistent congressional oversight. One of the most effective ways that Congress can shore up democratic norms is by making direct investments in the National Archives through proper funding channels to prevent future problems with the preservation and transfer of records. The Coalition (NCH) also encourages Congress to provide greater specificity and more effective enforcement mechanisms to the Presidential Records Act.

A New Agenda

This report aims to set a new agenda to support and strengthen the National Archives. It identifies acute institutional needs and recommends steps that Congress, the White House, federal agencies, and NARA's leadership can take to ensure the agency is properly funded and supported to fulfill its critical mission.

2. The National Security Archive (NSA) at George Washington University has documented a "thirty-year flatline" in NARA's gross total outlays from the early 1990s to 2020. The NSA analysis uses official budget figures from GovInfo and applies the Office of Management and Budget (OMB)'s nondefense spending budget deflator to account for inflation. Using this methodology, NARA's gross outlays show small increases in FY2021 and FY2022, but the rate of increase is too slow to address the institution's real needs. <https://nsarchive.gwu.edu/foia-audit/foia/2022-03-11/us-national-archives-nara-budget-30-year-flatline> Another approach is to use the figure for NARA's operating expenses that Congress provides in the final budget as passed and adjust it for inflation using the Consumer Price Index. The Congressional budget figure, it should be noted, leaves out funding for repairs and restoration, the Office of the Inspector General, and the National Historical Publications and Records Commission. Using this methodology, NARA's FY 2023 operating expenses in inflation-adjusted dollars were in fact *lower* than in any year between 2008 and 2019. See Appendix A.

We recognize that Congress has placed severe limits on federal spending for the next two years. We should not let that fact deter us from recommending essential goals and priorities for the coming years. NARA has legally mandated responsibilities that cannot be neglected: the public has an enduring need for information contained in NARA records, and those records have present day applications that affect peoples' lives, not only their research interests. Now is the time to commit to meeting the long-deferred needs of an essential US institution.

Funding

Every section of this report recommends that Congress provide increased funding, because NARA's needs require substantial investments in staff, technology, and infrastructure. Critical needs include:

- Staff and technology to aid in the declassification of federal records as legally mandated.
- Adequate support for receiving, processing, and disseminating digital records received from the agencies, which will likely be a central issue in the strategic plan under development.
- Funds to train and hire Subject Matter Experts (SMEs) on topics of broad public concern.
- Storage space for records (physical and electronic), properly maintained workspaces for staff, and flexible work environments including for telework.
- Funds for grants that the National Historical Publications and Records Commission (NHPRC) awards.
- NARA's oversight of agencies that are required to preserve and transfer records NARA.
- Funds necessary to fulfill digital records management mandates.

Declassification

NARA's National Declassification Center faces a backlog of thousands of declassification review requests, with anticipated wait times as long as twelve years.

- NARA might consider determining the staffing levels needed (a) to reduce wait times to two years, and (b) to intensify the systematic review of all classified presidential records from the Truman Administration forward. We encourage Congress to appropriate such funds.
- The Federal agencies that produce classified records held at NARA should fully support declassification of those records. All agencies with classified documents under review should contribute dedicated funding or detailees/annuitants to support declassification work at NARA. Where this is already happening, it should continue.

Presidential Libraries

- To encourage the creation of future presidential libraries and safeguard NARA's authority with respect to them, Congress should reassess the current model by which private presidential foundations provide 60% of library endowments. This reconsideration should take into account the increasingly digital environment that NARA operates in.
- NARA might determine the funding and staffing required to right-size the presidential library system, meet the commitments in its FY 2022–2026 Strategic Plan, and ensure that NARA has the appropriate systems for accepting and providing access to electronic

presidential records. Congress should provide that funding. The new strategic plan under development should consider this imperative.

- It is important that NARA and the private foundations physically distinguish the portions of presidential library facilities that are not maintained by NARA, and discourage foundation employees from using government email and other resources.

Subject Matter Expertise

- Congress should appropriate funds to increase the number of Subject Matter Experts (SME) and make them full-time employees, with two SMEs per subject area.
- NARA should consider filling those positions by expanding paid professional development opportunities to current archivists, and by hiring and training qualified historians and archivists from outside the institution.
- NARA may wish to clarify Subject Matter Experts' relationship to researchers.

Infrastructure

The costs to operate NARA's nationwide network of facilities are substantial, amounting to 27 percent of its operating expenses in FY 2022. A large part of these infrastructure costs goes to renting space to house NARA's Federal Records Centers (FRCs) and Regional Field Archives.

The stacks in the agency's Washington, DC, area archives are now overcrowded, despite NARA's space-saving practices, and records continue to arrive. NARA's Federal Records Centers and Regional Field Archives are dependent on the General Services Administration (GSA) and other landlords to perform even basic repairs, and Regional Field Archives are often both overlooked and under pressure.

Recommendations:

- NARA should consider continuing to engage in long-term planning to break from its dependence on leased space in its Federal Records Centers and Field Regional Archives.
- Despite NARA's best efforts, stack space overcrowding at the National Archives, Washington, DC, and at Archives II in College Park, Maryland, will continue, at least until more records are digitized and agencies continue their shift to electronic records. Congress might consider funding another archival facility near Washington, DC, or funding an addition to Archives II.
- NARA's regional archives system is an invaluable resource, but it suffers from dependence on leased space. The agency might explore partnerships with regional institutions such as state archives, historical societies, or universities to keep these facilities open and their holdings available.

The National Historical Publications and Records Commission (NHPRC)

- Congress should increase NARA's funding so that NHPRC grants represent an appropriate total NARA budgeting and expenditure. This requires new appropriations, not transfers of funds from other NARA functions.³
- NHPRC might channel expanded revenue streams into direct support grants-in-aid for state and territorial archives.
- Congress should expand the existing Commission to include a permanent voting seat for the Council of State Archivists.
- NHPRC transparency norms have corroded significantly over the previous decade and it is damaging user communities along with Congressional relationships. The Commission should do more of its work in the open, subject to public scrutiny, and NHPRC staff along with Commissioners should be reminded they are public servants who can and should consider dialogue with user communities an important part of the service responsibility.
- With respect to publishing grants, revoke the 10-year cap on successive award applications and reinstate award amounts capable of supporting multiple full-time salary lines.

Reforming the Presidential Records Act

The Presidential Records Act (PRA) should be amended to increase oversight and enforcement, which it currently lacks. The National Archives has created a manual for use by White House staff educating them about their responsibilities under the PRA.

- It is essential that Congress, the Justice Department, NARA, and the White House all commit to increased oversight to ensure compliance with the PRA. The PRA should be amended to mandate that the White House self-report violations it finds to NARA and Congress. Congress must exercise oversight responsibilities. The Department of Justice should expeditiously respond to referrals from NARA concerning missing records to ensure the property of the United States be returned.
- In consultation with NARA, the White House should establish a public records policy at the beginning of each administration. NARA should provide ongoing guidance throughout each president's term
- NARA can provide mandatory training to incoming White House staff who need to certify they have been made aware of their legal responsibilities under the PRA.
- The PRA mandates that any official electronic messages be copied or forwarded by the individual to their federal government account no later than twenty days after the creation or transmission of the message. Congress should create enforcement mechanisms to ensure that these requirements are met.
- Well before a presidential transition, the White House should decide, with the advice of NARA, which records can be transferred to the Archives in advance instead of waiting until the hectic period at the end of a presidential term.

3. The ratio for FY2023 is 1.8%, as noted above.

- Congress should pass [HR 1653, the “Promoting Accountability and Security in Transitions Act of 2023”](#) or the “PAST Act of 2023,” which establishes procedures and consequences, both pre- and post-election, to ensure the proper handling of presidential records.

Management of Permanent Federal Records by Executive-Branch Entities

For NARA to fulfill its mandate, the executive branch must preserve and transfer federal records as legally required.

- Congress should hold hearings to determine how executive-branch agencies are managing permanent records and how to improve their records-management systems.
- All federal agencies should report to Congress the levels of funding and staffing that they need to comply with federal records management laws, policies, and regulations. Congress should appropriate the funds to ensure compliance.
- Congress should provide NARA with adequate funding to support agency records-management efforts and to carry out regular audits of federal agencies.
- When transferring records to NARA, executive-branch entities should accurately describe records in sufficient detail to identify their origin and assist archival processing.

WORKING GROUP REPORTS

I. Declassification: Solving NARA's Classified Records Problem

The complex problem of classified records ranks high among the challenges facing the National Archives and Records Administration. Millions of pages of classified agency and presidential records continue to accumulate at NARA in both paper and digital form. Moreover, NARA has a large backlog: thousands of requests for the declassification of specific records that are in its holdings. For the sake of accountability and a fuller historical record, NARA needs more funding so it can make steady progress in reviewing and declassifying classified historical records and fulfilling Freedom of Information Act (FOIA) and Mandatory Declassification Review (MDR) requests.

Backlogs of Unresolved Declassification Requests

The National Declassification Center (NDC) and NARA's Special Access Staff have huge backlogs of FOIA and MDR requests, over 3,800 FOIA cases (including those for presidential records) and nearly 20,800 MDR cases. The Special Access Staff's FOIA backlog involves almost 10 million pages (the equivalent of 6 Washington Monuments in height). At present levels of staffing and resources, it will take many, many years to complete these requests. For example, in January 2022, the George W. Bush Library informed a FOIA requester with the National Security Archive that it would take twelve years for the National Archives to process the request because three hundred seventy Bush Library requests were ahead of his, involving the declassification of more than nine million pages. Under such circumstances, the results of such requests will become available long after they are of use to the initial requester.

Obstacles Faced by the National Declassification Center

In recent years, the NDC's struggles to process backlogs of FOIA and MDR requests and finalize appeals reflects a staffing deficit. We applaud NARA plans to add more staffers to the NDC and the Special Access staff; many more are needed to address the backlog of requests and accumulated classified records. Compounding the NDC's problem is its lack of authority over the agencies that created classified documents and now have the power of decision over their declassification. Declassification tends to have a low priority in agency budgets, contributing to long delays. Even highly skilled and experienced NDC staffers lack the authority to reverse agency decisions that they disagree with, a dynamic that perpetuates the over-classification problem.

The NDC's workload has expanded even further as a result of NARA's decision to centralize control of classified presidential records, which amounts to millions of pages of records and terabytes of digital files. That puts the NDC in a difficult position. Before receiving the presidential records, it was receiving somewhere in the range of three hundred FOIA and MDR requests a year. Now that the NDC has direct responsibility for the declassification of presidential records, it faces a logjam of over 4500 MDR requests (not counting FOIAs). That number will likely grow.

Technology Deficit

NARA also faces a technology deficit. For example, the NDC lacks the secure electronic transmittal systems needed to send classified records for agency referrals and relies instead on sending classified digitized records through the mail on diskettes. Another obstacle is NARA's lack of technology for participating in secure video conferences with other agency officials. Similarly, the Interagency Security Classification Appeals Panel (ISCAP), whose modus operandi is classified discussions between agency representatives, lacks the technology to convene virtual meetings to discuss pending appeals. This challenge, along with a staff shortage, complicates ISCAP's ability to reduce its own large backlog of appeals.

Need for Systematic Review of Classified Presidential Records

FOIA and MDR requests from researchers will lead to the declassification of individual presidential documents, which will only chip away at the huge volume of classified presidential records. Years ago, federal agencies sent teams to the presidential libraries to undertake a systematic review; later, through the CIA-led Remote Access Capture (RAC) Project, classified presidential records were scanned and sent to Washington, DC, for review. A few years ago, the CIA abandoned the RAC project for budgetary reasons. Now that these immeasurably valuable classified records are in NARA's hands, their systematic declassification review should be a priority, from the records of Harry S. Truman forward. Systematic review on a large scale is essential to easing the burden on the NDC caused by increasing numbers of FOIAs and MDR for classified presidential records; expanding the process might help relieve that burden.

Need for a Declassification Plan Supported by More Resources

The NDC needs enough staffing to process pending FOIA and MDR requests within two years. A larger NDC with support from agency detailees could also begin a systematic review of presidential records. Given the over 75 million pages of classified presidential records held by the National Archives, a successful and productive systematic review initiative by the NDC could begin at the modest rate of 150,000-200,000 pages a year. Once records are declassified, whether in whole or in part, the originals or excised copies would be returned to the presidential libraries for interfiling in the various collections. To make this process work more smoothly, the NDC should be empowered to make declassification decisions.

We welcome NARA's recent decision to add to NDC staffing and recommend further effort be put to determining the staffing levels needed for the NDC and ISCAP to reduce the wait times for FOIA and MDR declassification requests and appeals. Once a cost estimate for the necessary staffing has been made, we recommend that it be included in the budget request for the next fiscal year. Funding should represent an addition to NARA's budget rather than coming at the expense of NARA's existing responsibilities.

The classified records in NARA's holdings were produced by a wide variety of agencies, from the State Department to the CIA to the US armed services. Because all involved agencies are required to play a role in classification, they should be legally compelled to contribute resources, funding, and detailees to support declassification work. NARA should be empowered to use

qualified candidates with appropriate security clearances, such as retired civil servants, just as the State Department makes use of retired Foreign Service Officers for declassification review. NARA needs the flexibility to bring annuitants into the NDC. This may require a legislative fix.

To make progress on declassification, NARA requires a healthy budget. Even before the end of the two-year budget freeze, NARA, backed by its supporters, can present a strong case to Congress explaining why the Archives needs increased support to fulfill its mission and why support for declassification is essential for government accountability and the completeness of the historical record.

Recommendations:

- Expand systematic review of classified presidential records supported by higher levels of NDC staffing.
- Support declassification authority for the NDC so it can catch up with the backlog of requests and other vital work.
- To expedite their declassification activities, NDC and ISCAP need to acquire up-to-date technology.
- Agency support for declassification at NARA by providing detailees, annuitants, and funding.

II. The State of Presidential Libraries

Significant challenges now facing the presidential library system include insurmountable records requests backlogs⁴, an inefficient declassification process, and complex relationships between private presidential foundations and NARA.

It is time for Congress, the White House, and NARA to envision a new, sustainable model that provides funding levels capable of right-sizing the presidential library systems and presidential records infrastructure; ensures that NARA has functional systems for accepting and providing access to electronic presidential records; and embraces efficient declassification processes. Without these reforms, NARA and the presidential libraries will not be able to meet the needs of the public.

Access Delayed

The first goal of NARA's 2022–2026 Strategic Plan is to “Make Access Happen.” Current wait-times for FOIA requests at presidential libraries are years, often decades, long. Recent estimates place the backlog of records at the George W. Bush Library at 161 million pages, and NARA estimated in 2007 - one of the last times such an assessment was made public - that it would take one hundred years to release all of the holdings at the Reagan Presidential Library.⁵ More recently, NARA provided the State Department's Historical Advisory Committee with data showing that there is a backlog of 22,793 FOIA and Mandatory Declassification Review requests across the presidential library system.

NARA's Strategic Plan vows to “digitize analog records at the George W. Bush and William J. Clinton Libraries and the Special Access and FOIA Division to accelerate processing of FOIA records.”⁶ Yet it is unclear if the FY 2024 Performance Budget's request for “\$449 thousand increase to support digitization in Presidential Libraries” provides enough resources to meet the goals expressed in the Strategic Plan and reduce its declassification backlog.⁷ As a starting point, NARA could both provide a progress report on its stated digitization goals now that we are halfway through the Strategic Plan's timeframe, and determine the amount of funding that would be required to finish meeting the goals established for the libraries in its Strategic Plan. Congress should then provide that funding.

⁴ Figures provided by NARA show that, as of December 31, 2023, the National Declassification Center has a backlog of 1,448 presidential library FOIA requests, and 4,537 Mandatory Declassification Review requests, figures that don't account for the Johnson and H.W. Bush requests. The same data also shows a backlog of 437 FOIAs across the presidential libraries that have not had their classified records transferred to NDC, and 16,371 pending MDRs.

⁵ <https://www.politico.com/magazine/story/2017/05/07/presidential-libraries-are-a-scram-could-obama-change-that-215109/>

⁶ <https://www.archives.gov/about/plans-reports/strategic-plan/strategic-plan-2022-2026>

⁷ <https://www.archives.gov/files/about/plans-reports/performance-budget/2024-nara-congressional-justification.pdf>

Declassification Inefficiencies

NARA has begun the process of collecting classified records from the presidential libraries, processing them at the National Declassification Center in Washington, DC, and eventually returning the records to their home libraries. We hope this initiative will improve wait times for requests for records that are unclassified and will make the release of declassified records more efficient. We recommend that the NDC consider a “release to one, release to all” policy for the classified presidential papers it processes. These declassified records could be published online by the NDC as well as on individual library websites

Electronic Presidential Records

The constraints that are present in an analog world will only worsen with electronic presidential records. NARA’s FY 2024 Performance Budget expressly states, “NARA’s existing systems for preserving and providing access to electronic records from agencies are not easily adapted for Presidential records because of the newer formats and complex access restrictions and reviews for Presidential records.”⁸ To avoid delays in accessing the records of future presidential administrations, NARA can identify the system requirements for the incoming terabytes of electronic presidential records. Congress should provide funding allowing NARA to acquire them as soon as possible.

Endowments and the Relationship between NARA and Presidential Foundations

The constraints faced by presidential libraries are exacerbated by the current structure of their relationships with private presidential foundations, which NARA was required to analyze and report on by the Presidential Historical Records Preservation Act of 2008. The Act required NARA to produce a report on alternative models for presidential libraries, including relationships with the presidential foundations. NARA produced this report, Report on Alternative Models for Presidential Libraries Issued in Response to the requirements of PL110-404, on September 25, 2009.

The major change between 2009 and today’s environment concerns the endowment rates private foundations are required to pay if they want to participate in the traditional library model established in the Presidential Libraries Act. The Act created a system whereby private presidential foundations pay for the construction of the libraries, then fund an endowment equal to a fixed percent of construction costs to NARA when NARA accepts the title of the physical library. The initial percentage was 20 percent; the current rate, which was enacted in 2008, is 60 percent. Because the 60 percent level did not take effect until 2008, and the Obama Foundation declined to pursue a traditional library, to date no presidential foundation has entered into a presidential library agreement at the 60 percent level.

It is too soon to tell if the agreement between the Obama Foundation and NARA, in which the Obama foundation agreed to pay for the digitization of records but eschewed building a traditional library, will be followed by future administrations. It is also unclear if the amount paid

⁸ <https://www.archives.gov/files/about/plans-reports/performance-budget/2024-nara-congressional-justification.pdf>

by the Obama Foundation to digitize records will reduce the government's burden over the long run as electronic preservation and data security methods evolve. NARA should also re-evaluate its 2009 Report on Alternatives for Presidential Libraries as it assesses the long-term financial impact of electronic preservation of presidential records.

Recommendations:

These problems are not new but have been compounded in recent years by the growing volume of electronic records. The Presidential Historical Records Preservation Act of 2008 required NARA to report to Congress on alternate models for the presidential library system that would improve access and preservation. NARA's report, issued in 2009, examined four alternate models but declined to endorse any one of them. Fifteen years later, we face the same challenges. To turn the tide, we believe NARA might:

- Re-evaluate the alternative presidential libraries models outlined in its 2009 report and assess which model, if any, best suits NARA's needs in an increasingly digital world.
- Identify the level of funding required to right-size the presidential library system, meet the commitments in its FY 2022–2026 Strategic Plan, and ensure that NARA has appropriate systems for accepting and providing access to electronic presidential records. Congress should then provide that funding.
- Continue the practice of a “release to one, release to all” model for classified presidential records processed by the NDC.

And that:

- Congress reassess the current 60 percent endowment rate for presidential libraries.

III. Subject Matter Expert Program

The current Subject Matter Expert (SME) program focuses on enabling staff to assist researchers working with NARA-managed materials. NARA management hopes to see more opportunities for SMEs to consult and collaborate with appraisal staff to assess federal records for archival value. SMEs currently conduct work in their subject areas across the record's lifecycle and provide assistance to stakeholders such as agency records managers and NARA appraisal staff.

In 2021, NARA took concrete steps to address the decade-long erosion of subject expertise. The agency's "vision is to identify a core baseline set of topics that should always have an expert archivist and a more fluid set of topics that may change over time." Most notably, they added three new subject matter areas and received approval to hire for those positions. These include African American History, Asian American and Pacific Islander History, and Hispanic and Latino History. This brings the current number of SMEs to twelve.

Concerns remain regarding the number of areas represented and the depth of expertise required in an SME's particular subject area, which takes years to acquire through direct work with records and graduate study.

As of 2021, SME positions have been opened to NARA employees who meet time-in-grade and education requirements. Applicants are asked to demonstrate existing expertise in subject area related records. SMEs are expected to have hands-on, in-depth knowledge of the records pertinent to their subject matter. Formal education in the subject area is not a requirement to be selected for an SME position, although some SMEs have formal training in their topics.

In-depth knowledge of the records themselves is critical to the SME role. But is this necessary qualification also sufficient? The challenge lies in striking a balance between archival knowledge of the records and historical knowledge of the topic and its contexts. Because SME positions are open only to current NARA employees, are 50% FTE, and require previous hands-on work with the records, it is difficult for someone formally trained in archival science and holding a graduate degree in a particular topic to imagine a career trajectory as an SME. As new subject areas are identified, the SME program may benefit from hiring from outside the agency. In such cases, both the agency and users would profit from a developmental structure that enables individuals with formal training in a subject area to develop records expertise, in addition to providing existing archival staff with the appropriate depth and breadth of historical training. A clear path should be available for on-the-job training and advancement into SME roles, as well as support for professional development.

Current funding levels prevent significant expansion of the SME program through hiring. Until budgets increase, additional focus should be on providing professional development opportunities for existing staff. Such opportunities might include conference attendance or coursework. If the agency secures additional funding, the SME program would benefit from establishing coverage of additional specialties and dedicating more than one SME to a subject area—thereby allowing robust guidance for agency records managers, appraisal staff, and researchers.

Currently, the SME program covers the following subjects:

Aerial Photography
African American History
Asian American/Pacific Islander History
Civil Rights
Court Records
Foreign Affairs
Genealogy / Census
Hispanic/Latino History
Holocaust Era Assets
Immigrant Records
Native American Records
US Navy / US Marine Corps / US Coast Guard Records
Women

As NARA expands the SME program, additional research areas requiring expertise may include but are not limited to:

Agriculture
Business and Economy
Education
Executive Branch Law and Justice Records
Gender
Health and Social Welfare
Labor
Natural Resources and Environment
Special Format Materials: Cartography, Motion Picture, Still Photography

Recommendations:

- Continue expanding subject areas included in the SME program.
- Increase support for professional development in histories related to subject areas.

IV. NARA's Infrastructure Challenges

Maintaining federal records—whether permanent archival or temporary agency records—requires enormous amounts of secure and efficiently organized physical and virtual spaces. Record storage facilities, moreover, need to provide not just adequate capacity and room for future growth, but specialized environmental and safety controls as well as enhanced security protections.

NARA operates forty-three facilities in seventeen states and Washington, DC. These include an archive and museum in downtown Washington, DC, an archive and research facility in College Park, Maryland (informally known as Archives II), thirteen regional archives and research facilities, eighteen Federal Records Centers (FRC), and eleven presidential libraries and museums. In addition, NARA rents temporary storage space for the Obama and Trump presidential records.



Image: NARA Facilities—locations (<https://www.archives.gov/LOCATIONS>)

Note: Some facilities house multiple functions, for example an archive and a records center or an archive and a museum. The Pittsfield (MA) Federal Records Center closed for records operations in April 2023.

NARA's Infrastructure Costs

The costs to operate NARA's network of facilities are substantial. This is true whether the buildings are leased or owned by the agency. For FY 2022, NARA allocated \$115.822 million for facilities operations. This equates to 27 percent of its appropriated, allocated funding. In FY22, NARA spent \$9.259 million to lease space for federal records centers and regional archives, mainly to the GSA.⁹ This money comes from NARA's annual appropriation. Some larger,

9. National Archives, *FY 2024 Congressional Justification*, March 23, 2023, NARA 7-8. Email communication from Meg Phillips, NARA External Affairs Liaison, to Bruce Bustard, September 7, 2023.

multiyear projects—such as replacing the HVAC system at a presidential library, strengthening the sea wall that protects the Kennedy Library, or replacing the roof at Archives II—are funded through separate, congressionally directed funding that addresses projects described in NARA’s Capital Improvement Plan.¹⁰

Washington DC Facilities

NARA took ownership of its historic headquarters on Pennsylvania Avenue in Washington, DC, in 1985, when it became an independent federal agency. NARA also owns Archives II, the modern 1.8 million square foot research, preservation, and storage facility in College Park, Maryland, which opened in 1994. Archives II relieved a chronic archival records storage problem and allowed NARA to move its archival records from rented space in the Washington, DC, region. Over the last twenty-five years, records have continued to fill the stacks in both buildings. More space is necessary and requires sufficient appropriations.

Both Archives II and the downtown Washington, DC, building are now full, but NARA continues to access analog records in a variety of formats, including paper, photographs, video and sound recordings, maps, and architectural drawings. The continuing shift to electronic records in the federal government and the full adoption of FERMI¹¹ will eventually slow this stream of records, but over the short term, a surge of these formats has arrived in NARA’s holdings. In the Washington, DC, building, congressional records take up substantial and still increasing space. These records remain the property of the House and Senate, and NARA, as an agency of the executive branch, has little control over what is sent to them.

NARA has done what it can to cope with overcrowding, including adding additional shelving above once top levels. NARA retires infrequently used records to off-site storage in other parts of the country. The agency is also converting space at Archives II to build out an area focused on high-volume digitization.

Regional Field Archives and Federal Records Centers

Regional field archives and FRCs play a crucial role in NARA’s mission to manage federal records nation-wide. Staff at FRCs in the regions work with federal agencies to transfer, retrieve, return, and dispose of current agency records according to records schedules developed by NARA and the agencies. NARA records centers hold over twenty million cubic feet of records for almost four hundred federal agencies, although these holdings are decreasing as more records are produced and stored electronically. Specifically, electronic tax-filing reduced the space needed for paper Internal Revenue Service records, which take up a large percentage of FRC holdings, while the lifting of the tobacco litigation freeze permitted the destruction of records well past their scheduled disposition date.¹²

10. For a list of the types of projects funded through NARA’s Capital Improvement Plan, see NARA FY 2024 Congressional Justification., RR-7—RR-9.

11. “White House Extends e-records deadline to June 2024,” *Federal News Network*, December 23, 2022.

12. Phillips/Bustard communication. NARA’s records center program went to a fee for service model in 2000.

NARA's thirteen field archives hold permanent records from regional offices of federal agencies. Such records are an invaluable resource for historians working on local, state, regional, territorial, and tribal topics as well as providing legal, environmental, and other researchers with convenient locations to use original records. Genealogists and historians make extensive use of regional holdings of original and microfilmed documents such as naturalization and passenger lists, business and personal bankruptcy case files, civil and criminal case files from federal courts, treaties and other records.

With the exception of the National Archives at Atlanta, NARA does not own any of its regional records centers or archives. As tenants occupying leased space, NARA has less flexibility about how the facilities can be used and depends on the GSA or other landlords for maintenance and repair. Because of the GSA's own budget shortfalls, even basic repairs are often neglected. For example, the Washington National Records Center in Suitland, Maryland, suffers from a leaky roof and poor air handlers, problems the GSA does not have the money to fix.

The long-term future of NARA's record centers is concerning. Will the agency continue to need as much space in future decades or will the decline in paper records allow for consolidation? If agencies move to use outside contractors, will that shift reduce the need for leased space? Are there ways to reduce rental costs and provide better maintenance in the spaces NARA leases?

Regional archives have sometimes been an afterthought in agency planning. They are often attached to a larger record center, and efforts to raise their regional profile have produced meager results. The agency has tried to lessen the impact of losing the Alaska region—which closed in 2014—by digitizing records once held there. Digitization is a long-term solution. In April 2021, after protests from researchers, historical organizations, tribal groups, and regional congressional representatives as well as a lawsuit whose plaintiffs included the American Historical Association, the Office of Management and Budget (OMB) withdrew a proposal to close the facility in Seattle and relocate its records to Missouri and California.¹³

Pressure for further consolidation of regional facilities will grow as rental costs mount and the federal government looks to cut costs by selling-off what it views as surplus buildings. Records will continue to move to electronic formats, so the digital future renders access issues different than today.

Recommendations:

- NARA should continue to lessen its dependence on leased space in its FRCs and Field Regional Archives.
- Despite NARA's best efforts, stack space overcrowding at the National Archives, Washington, DC, and at Archives II in College Park, Maryland, will continue, although the shift from physical to virtual spaces may ameliorate the situation. NARA should not return to leasing space, which was a problem addressed by opening Archives II. Congress

13. "National Archives to Close in Alaska, Relocate to Seattle," *Seattle Times*, March 12, 2014; "Biden Halts Sale of National Archives Center in Seattle," *Juneau Empire*, April 10, 2021.

should consider funding another archival facility near Washington, DC, or funding an addition to Archives II.

- NARA's regional archives system is an invaluable resource that suffers from a low profile and dependence on leased space. The agency might continue to explore partnerships with regional institutions such as state and territorial archives (some exist already), historical societies, or universities to keep these facilities open and their holdings widely available.

V. The National Historical Publications and Records Commission (NHPRC)

The National Historical Publications and Records Commission (NHPRC) provides grants “to preserve, publish, and encourage the use of documentary sources, created in every medium ranging from quill pen to computer, relating to the history of the United States.” The commission was created through Public Law 73-432, the same 1934 statute that blueprinted the National Archives and directed it to “make regulations for the arrangement, custody, use, and withdrawal of material deposited in the National Archives Building.” Congress created the NHPRC to ensure that *access*—a contemporary synonym for *use* and *withdrawal*—had coequal priority in NARA’s original design concept.

Founded in the print age, the NHPRC now prioritizes the creation of digital products. All seven of its current opportunity categories either require or strongly favor applications with a digital component.¹⁴

Often described as NARA’s “grant-making” body, the NHPRC obtained this authority in 1964; until then, it focused on the narrower task of preparing “plans, estimates, and recommendations for such historical works and collections of sources as seem appropriate for publication at the public expense.” The Archivist of the United States transmitted these suggestions to Congress annually. Final decisions about which publications to underwrite remained a function of the legislative process.

Change came in 1965, when NHPRC began receiving its own budget to disburse program support directly to publishers, editors, and history professionals who specialized in the work of converting historical manuscripts into books and periodicals that anyone with a library card could obtain. By democratizing access to historical information in this way, publication was meant to serve an important leveling function, transforming what had been the specialized province of a few highly trained knowledge workers into broadly available tools for document-based teaching, learning, and research.

The impact of the 1964 amendments was not just systemic but eco-systemic, creating a competitive ecology for NHPRC award monies that drew in the participation of colleges and universities, historical societies, the state and territorial archives, foundations, and other collaborators from the private sector. Congress began expanding the NHPRC’s composition as well, creating seats for professional societies like the American Historical Association, Organization of American Historians, the Society of American Archivists, the Association for Documentary Editing, and the American Association for State and Local History.¹⁵ Hundreds of new publications followed in the wake of these reforms, as did more derivative works, including some that memorably imprinted the popular culture.

14. These seven categories include: [Archival Projects](#) | [Public Engagement with Historical Records](#) | [Publishing Historical Records in Collaborative Digital Editions](#) | [NHPRC-Mellon Planning Grants for Collaborative Digital Editions in African American, Asian American, Hispanic American, and Native American History and Ethnic Studies](#) | [Major Collaborative Archival Initiatives](#) | [Archives Collaboratives](#) | [State Board Programming Grants](#).

2. See [here](#) for a full list of the Commission’s membership.

Finally, the Commission's contemporary remit stems from additional revisions that Congress introduced in 1974, enlarging its scope to "support archival projects in public and private institutions," and in recognition that preservation and access are not simply a consequence of publication.¹⁶ It relies on a healthy environment for the State Historical Records Advisory Boards (SHRABs), and for dedicated funding through the State Grant Program, an important delivery system for SHRAB resources.

NHPRC's Needs

NHPRC's ability to fulfill its legislative mission requires congressional support.

Congressional outlays for NHPRC-funded grants have fallen precipitously. When Congress provided NHPRC with an appropriation of \$4 million in FY 1980—the equivalent of \$14.4 million in 2023 dollars—it was in keeping with the program's longstanding budgetary footprint and realistic appreciation for the true cost of NHPRC-funded activities. By contrast, Congress appropriated just \$12 million in FY 2023, a net decrease of \$2.4 million from a benchmark set in FY1980--over four decades ago.

Equally concerning is the declining representation of the NHPRC as a percentage of NARA's annual budgetary throughput, dropping from 4.9% of overall agency expenditures in FY 1980 to just 1.8% in FY 2023.

The cumulative impact of these depletions has forced NHPRC staff to impose rollbacks that have destabilized user communities, abandoned longstanding priority initiatives, and undercut the NHPRC's perceived value to public humanities professionals and institutions.

A new Archivist can address some of these issues directly. In recent years, there have been concerns about award caps and successive funding eligibilities; the need for real dialogue, transparency, and communication with user communities; the need for a strategic plan that sunsets long-term initiatives with due regard for job retention, job creation, and the sustainability of public-private ecosystems that generate public humanities content.

Recommendations:

- Congress should increase NARA's funding so that NHPRC grants represent 3.5% of total NARA budgeting and expenditure. This requires new appropriations, not transfers of funds from other NARA functions.¹⁷
- NHPRC might channel expanded revenue streams into direct support grants-in-aid for state and territorial archives.
- Congress should expand the existing Commission to include a permanent voting seat for the Council of State Archivists.

16. See Frank Burke, "[The Beginings of the NHPRC Records Program](#)," *The American Archivist* 63, no. 1 (January 1, 2000): 18-42.

17. The ratio for FY2023 is 1.8%, as noted above.

- NHPRC transparency norms have corroded significantly over the previous decade and it is damaging user communities along with Congressional relationships. The Commission should do more of its work in the open, subject to public scrutiny, and NHPRC staff along with Commissioners should be reminded they are public servants who can and should consider dialogue with user communities an important part of the service responsibility.
- With respect to publishing grants, revoke the 10-year cap on successive award applications and reinstate award amounts capable of supporting multiple full-time salary lines.

VI. Management of Permanent Federal Records

For NARA to fulfill its congressional mandate, the executive branch must preserve, manage, and transfer permanent federal records as legally required. Since the enactment of the Federal Records Act of 1950 and subsequent amendments, federal law and regulations establish a framework for the proper management of executive branch records, including the regular and efficient transfer of permanent records to the custody of the National Archives. The Archivist of the United States and NARA have legal authority:

- to determine which records have historical value and to affect their transfer to NARA's custody
- to establish records management standards and procedures
- to conduct inspections of federal agency records management programs and practices

This framework stipulates that adhering to records retention schedules and the transfer of permanent records to NARA is mandatory.¹⁸

The Responsibility of the Executive Branch to Preserve and Transfer Records

Good records management within the executive branch leads to reliable archives, which helps establish the public's right to know; the accountability of government officials and programs; and the preservation of government records with historical value. Proper records management enables historical understanding and ensures that the nation's social, cultural, economic, scientific, and political experience is available to future generations.

Leadership in the area of records management starts at the top and extends to all levels of an organization. Executive agencies and public officials—including the president, vice president, and cabinet secretaries—must embrace the fact that the records they create are public assets. NARA cannot do its work without the cooperation of federal officials at every level.

A 2011 Presidential Memorandum on the reform of records management policies and practices across the executive branch—the first since the Truman administration—established successful implementation of records management requirements as a priority for agency officials.¹⁹ NARA and the OMB have since issued a series of directives and bulletins aimed at modernizing the government's records management framework; among other issues, they addressed electronic records management, training, and the responsibilities of senior agency officials.²⁰ Joint OMB/NARA memoranda issued in 2019 and reaffirmed in 2022 established challenging but necessary goals for executive agencies to manage their permanent electronic records. In this regard, NARA has demonstrated crucial leadership in managing born-digital records and establishing digitization standards for analog materials.

18. For example, see: 44 U.S.C. § 2107, 2904, 2906, 3303 and 36 CFR § 1226.10, 1226.22, 1235.10, 1235.12

19. <https://www.whitehouse.gov/the-press-office/2011/11/28/presidential-memorandum-managing-government-records>

20. <https://www.archives.gov/records-mgmt/policy>

Current Problems

A succession of reports conducted over the last decade have revealed concerning trends in federal government records management.²¹ Furthermore, a NARA assessment revealed several challenges in implementing records schedules. These include permanent records that are overdue for transfer, as well as a lack of agency-provided information to support NARA's processing and description efforts, which in turn facilitate public discovery and access.²² The 2022 agency records management report²³ suggests relatively stagnant progress in recent years, with only 41% of agencies reporting low risk. In line with this, only 40% of agencies report that the Senior Agency Official for Records Management is engaged in their electronic records management program and taking positive steps to provide resources in this regard. Only 32% of agencies report having an inventory of systems used for managing electronic records that includes the ability to manage retention and disposition. Similarly, fewer than half of all agencies have electronic information systems that meet NARA's requirements for the creation, capture, and preservation of records that have tested or successfully transferred permanent electronic records to the National Archives. In 2022, only 42% of agencies transferred permanent non-electronic records to NARA; only 20% transferred permanent electronic records.

Over the last three years, NARA has issued a series of inspection reports²⁴ on the management of permanent federal records and an assessment report²⁵ on the records-management implications of history collections maintained by federal agencies. These multi-agency reviews revealed that agencies are not routinely transferring permanent records to the National Archives. NARA also determined that a lack of senior leadership support for records management within agencies inhibits compliance with policies, guidance, procedures, and regulations related to permanent federal records. Improper records management and delayed transfer of permanent records increases the risk of loss, damage, and deterioration of historically valuable records.

Recommendations:

The National Coalition for History recommends that Congress:

- Explore how executive branch agencies manage permanent federal records, and how they can improve their records management systems
- Provide NARA with adequate funding to support agency records management efforts and carry out regular audits of federal agencies' records management practices
- Provide executive branch entities with the necessary resources to meet their responsibility for the proper management of federal records. Executive branch entities should transfer

21. <https://www.archives.gov/records-mgmt/resources/reporting>

22. <https://www.archives.gov/files/records-mgmt/resources/big-bucket-schedule-implementation-report.pdf>

23. <https://www.archives.gov/files/records-mgmt/resources/federal-agency-records-management-annual-report-2022.pdf>

24. <https://www.archives.gov/records-mgmt/resources/rm-inspections>

25. <https://www.archives.gov/files/records-mgmt/resources/history-collections-federal-agencies-assessment-report-ks-edit-2.pdf>

permanent records to NARA's custody in accordance with approved records schedules and in such a manner as to ensure their efficient preservation, discovery, access, and use

The Coalition recommends that executive branch entities:

- Provide accurate identification of records being transferred to NARA, with sufficient detail to identify their origin, assist with archival processing, and allow description
- Determine the resources required, including as part of information technology modernization efforts, to ensure electronic records management requirements are achieved. Congress should ensure adequate funding is available for agencies to meet these government-wide mandates.

APPENDIX A

National Archives Operating Expenses in Inflation-Adjusted Dollars FY 2007–2023

FISCAL YEAR	ACTUAL DOLLARS (MILLIONS)	INFLATION-ADJUSTED DOLLARS
2007	\$279	\$405
2008	\$312	\$436
2009	\$327	\$459
2010	\$339.7	\$468
2011 (BUDGET FREEZE)	\$339.7	\$453
2012	\$373	\$489
2013	\$353	\$456
2014	\$370	\$470
2015	\$365	\$463
2016	\$372	\$466
2017	\$381	\$468
2018	\$385	\$461
2019	\$373	\$439
2020	\$359	\$417
2021	\$377*	\$418
2022	\$388	\$399
2023	\$427	

Note: In FY 2021, NARA received a one-time \$18 million budget increase to address costs associated with the presidential transition. In reality, NARA's FY 2021 OE budget reflects no increase from the previous fiscal year.

Source: <https://www.usinflationcalculator.com/>