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NATIONAL RECONNAISSANCE OFFICE

14675 Lee Road
Chantilly, VA 20151-1715

18 July 2016

Mr. John Greenewald, Jr.
[REDACTED]

Dear Mr. Greenewald:

This is in response to your request dated 16 June 2016 and received in the National Reconnaissance Office (NRO) on 17 June 2016. Pursuant to the Freedom of Information Act (FOIA), you requested a copy of the final report by the NRO Inspector General, on the investigation entitled: "Inspection of the National Reconnaissance Office Declassification Activities closed 10/22/14".

Your request has been processed in accordance with the FOIA, 5 U.S.C. § 552, as amended. A thorough search of our files and databases located one document totaling thirty-three (33) pages responsive to your request. This document is being released to you in part.

Information is denied pursuant to FOIA exemption (b)(3), which is the basis for withholding information exempt from disclosure by statute. The relevant withholding statute is 10 U.S.C. § 424, which provides (except as required by the President or for information provided to Congress), that with respect to the NRO, "no provision of law shall be construed to require the disclosure of (1) the organization or any function" of the NRO; or "(2) the number of persons employed by or assigned or detailed to any such organization or the name or official title, occupational series, grade, or salary of any such person."

You have the right to appeal this determination to the NRO Appellate Authority, 14675 Lee Road, Chantilly, VA 20151-1715, within 90 days of the above date. Should you decide to do this, please explain the basis of your appeal.

If you have any questions, please call the Requester Service Center at (703) 227-9326 and reference case number F-2016-00089.

Sincerely,

Patricia B. Cameresi
FOIA Public Liaison



NATIONAL RECONNAISSANCE OFFICE

OFFICE OF INSPECTOR GENERAL

FINAL REPORT
(U) Inspection of NRO Declassification Activities
Project Number 2013-005 N
22 October 2014

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Approved for Release: 2016/07/11 C05094460

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NATIONAL RECONNAISSANCE OFFICE

Office of Inspector General
14675 Lee Road
Chantilly, VA 20151-1715




22 October 2014

MEMORANDUM FOR DIRECTOR, NATIONAL RECONNAISSANCE OFFICE
PRINCIPAL DEPUTY DIRECTOR, NATIONAL RECONNAISSANCE
OFFICE
DEPUTY DIRECTOR, NATIONAL RECONNAISSANCE OFFICE
CHIEF INFORMATION OFFICER

SUBJECT: (U) Final Report: Inspection of NRO Declassification
Activities (Project Number 2013-005 N)

(U) The National Reconnaissance Office (NRO) Office of Inspector General (OIG) report on the *Inspection of NRO Declassification Activities* is attached. I am providing this report for your information and the Chief Information Officer's (CIO) implementation of the recommendations. The OIG acknowledges receipt of the CIO's proposed action plans to resolve the recommendations (9 October 2014 concurrence memorandum - Appendix C). The CIO is requested to report via the TIER system on the status of actions taken and estimated completion dates by 16 January 2015.

(U//~~FOUO~~) I appreciate the courtesies extended to my staff during this inspection. Please direct any questions you may have regarding this inspection to [redacted] Lead Inspector, at [redacted] (secure), or [redacted]. Please direct any questions you may have regarding corrective action reporting to [redacted].


Adam G. Harris
Inspector General

Attachment:

(U) Final Report: Inspection of
NRO Declassification Activities
(Project No. 2013-005 N) (U//~~FOUO~~)

SUBJECT: (U) Final Report: Inspection of NRO Declassification
Activities (Project Number 2013-005 N)

OIG [redacted] 22 October 2014

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Director, National Reconnaissance Office
Principal Deputy Director, National Reconnaissance Office
Deputy Director, National Reconnaissance Office
Chief Information Officer
OIG Lead Inspector (for official file)

OIG [redacted]

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OIG [redacted]

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EXECUTIVE SUMMARY

(U) Inspection of NRO Declassification Activities



(U) To view the full report, including the scope, methodology, results, and management comments, go to <https://corpstaff.svc.nro.ic.gov/oig>

(U) Why the OIG Did This Inspection

~~(U//FOUO)~~ The National Reconnaissance Office (NRO) Office of Inspector General (OIG) initiated this inspection to address concerns expressed by the NRO's former Chief Information Officer (CIO). Those concerns regarded declassification authorities, roles, responsibilities, applicable policies, and the ability of the CIO to meet declassification review deadlines for NRO records reaching 50-year-old thresholds. Additionally, the OIG sought to follow up on declassification process and policy concerns that the OIG first identified during the 2011 NRO OIG *Special Review of the Center for the Study of National Reconnaissance* (CSNR). Clarity in the roles and responsibilities regarding CIO declassification activities and the CSNR mission is essential to supporting the Director, NRO's goal of better communicating the NRO mission, contributions, and history.

(U) Executive Order (E.O.) 13526, *Classified National Security Information Memorandum* states that an agency should classify and safeguard information expected to cause identifiable or describable damage to national security. E.O. 13526 also states that an agency should declassify information as soon as it no longer meets standards for classification in order to provide greater access to public records. E.O. 13526 further establishes requirements for three types of declassification: Automatic Declassification Review, Systematic Declassification Review, and Mandatory Declassification Review.

(U) What the OIG Found

~~(U//FOUO)~~ Updated NRO policies, which were amended to clarify declassification authorities, roles, and responsibilities, mitigate the concerns identified in the 2011 NRO OIG *Special Review of the CSNR* and more recent concerns expressed by the former CIO. However, the OIG identified weaknesses in the execution of the declassification programs that impair the effectiveness and efficiency of the programs. Specifically, the OIG found that the CIO Information Management Services Office (1) is not using program data to measure and monitor progress toward program goals; (2) employs a resource intensive Automatic Declassification Review process that results in minimal information available to the public on NRO mission, contributions, and history; and (3) has not adequately documented the roles, responsibilities, and training for Program Records Officers in NRO records management policies.

~~(U//FOUO)~~ If these weaknesses are not addressed, the CIO will be unable to assess his ability to meet 50-year-old declassification deadlines, and resources will not be effectively employed to declassify as much information as possible.

(U) What the OIG Recommends

~~(U//FOUO)~~ The OIG is issuing four recommendations to enhance the efficiency and effectiveness of the declassification programs and achieve the desired effect of E.O. 13526 and the goals of the Director, NRO. The CIO concurred with the OIG recommendations.

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**(U) NATIONAL RECONNAISSANCE OFFICE
OFFICE OF INSPECTOR GENERAL**

**(U) Inspection of NRO Declassification Activities
(Project Number 2013-005 N)**

(U) INTRODUCTION

~~(U//FOUO)~~ The National Reconnaissance Office (NRO) Office of Inspector General (OIG) initiated this inspection to address concerns expressed by the former NRO Chief Information Officer (CIO), who had been assigned declassification activity responsibilities. The former CIO expressed concerns regarding declassification authorities, roles, responsibilities, and applicable policies and sought assistance in determining if her organization was prepared to meet declassification review deadlines for NRO records that were, for the first time, reaching 50-year-old thresholds. Additionally, the OIG sought to follow up on declassification process and policy concerns that were first identified during the 2011 NRO OIG *Special Review of the Center for the Study of National Reconnaissance (CSNR)*¹ (Project No. 2011-005 N). During that review, the OIG discovered inconsistencies in the execution of the NRO declassification processes and noted examples of several NRO components operating contrary to NRO policy. However, the OIG concluded that the concerns were broader than the scope of the CSNR Special Review, and determined that the OIG would conduct a separate inspection later.

~~(U//FOUO)~~ This inspection of NRO Declassification Activities focused on evaluating the efficiency and effectiveness of the three NRO declassification programs—Automatic Declassification Review (ADR),² Systematic Declassification Review (SDR), and Mandatory Declassification Review (MDR)—and the NRO's compliance with Executive Order (E.O.) 13526, *Classified National Security Information Memorandum* and internal NRO policies. The objectives of these declassification programs, and the responsibilities of the CSNR, support the goal of the Director, NRO (DNRO) to better communicate the NRO mission, contribution, and history.

(U) BACKGROUND

(U) Executive Order 13526 and Federal Oversight

(U) E.O. 13526 states that an agency should classify and safeguard information expected to cause identifiable or describable damage to national security. E.O. 13526 also states that an agency should declassify information as soon as it no longer meets standards for classification in

¹ (U) The CSNR promotes the study and history of national reconnaissance.

² (U) For the purpose of this report, all references to "Automatic Declassification" (as set forth in Executive Order 13526) will be stated as "Automatic Declassification Review" or "ADR" (as set forth in NRO CIO policies and procedures).

order to provide greater access to public records.³ E.O. 13526 further establishes requirements for three types of declassification: ADR, SDR, and MDR.

(U) ADR requires that all classified records shall be automatically declassified when they reach 25 years of age, unless they are reviewed and determined to qualify for specific exemptions. With approval from the Interagency Security Classification Appeals Panel (ISCAP),⁴ agency heads may exempt from automatic declassification specific information that could cause significant damage to national security. Records not declassified at the 25-year mark due to exemptions, must be reviewed again once they reach 50 years old. Information exempted from ADR shall remain subject to the SDR and MDR provisions of E.O. 13526.

(U) SDR complements ADR in that it requires agencies to review records of permanent historical value exempted from ADR, but which could possibly be declassified—typically a collection of records covering a specific topic. Agencies shall prioritize such reviews based on research interest and the likelihood of declassification upon review.

(U) MDR requires agencies to review, at the request of an individual or another agency, specific classified national security information for declassification. This program allows historians, researchers, and other members of the public to request records pertinent to their research.

(U) The National Archives and Records Administration (NARA) is the oversight agency responsible for appraising all federal records, approving their disposition, providing program assistance and records center storage, evaluating records management programs, and serving as the final custodian of permanent records. The NARA Information Security Oversight Office (ISOO) establishes standards for classification and declassification and is charged with implementing and monitoring this function. ISOO conducts on-site reviews of executive branch agency programs to determine the degree of compliance with E.O. 13526 and its implementing directive, 32 Code of Federal Regulations Part 2001, and reports annually to the President of the United States on the status of those programs. ISOO analysts conducted an assessment of NRO's ADR program in 2011 and rated the program as "Green"⁵ with no deficiencies noted.

(U) NRO Implementation of Executive Order 13526

~~(U//FOUO)~~ The NRO realigned management of the NRO's declassification programs from the Management Services and Operations Directorate (MS&O) to the CIO in October 2012.

³ (U) A record, as defined by the Federal Records Act, 44 United States Code Chapter 33, includes all books, papers, maps, photographs, or other documentary materials made or received by an agency in connection with the transaction of public business and preserved by that agency as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government.

⁴ (U) The ISCAP, staffed by representatives from the Departments of State, Defense, and Justice, the National Archives, the Office of the Director of National Intelligence, and the National Security Advisor, was established for the sole purpose of advising and assisting the President in the discharge of his authority to protect the national security of the United States. The ISCAP has the authority to approve, deny, or amend agency exemptions from automatic declassification.

⁵ (U) ISOO found no instances of missed equities, improper exemptions, or inappropriate referrals. ISOO gave the NRO a score of 98 out of 100, which is a rating of Green according to ISOO's scoring chart.

Within the CIO, the Information Management Services Office (IMSO) is responsible for protecting the organization's information, activities, equities, and programs through its records management programs, while providing the public with access to records in accordance with federal regulations through its review and declassification programs. IMSO has [redacted]

[redacted] It has an annual budget of approximately

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[redacted] Groups within IMSO are the Information Management Group (IMG), Information Review & Release Group (IRRG), and the NRO Library, which provides a full range of traditional library services using both open source and classified resources (See Figure 1 below).

(U) Figure 1: IMSO Organizational Chart

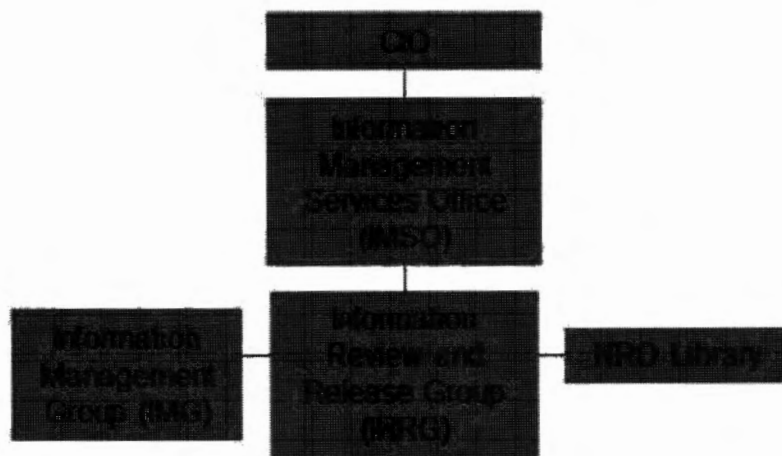


Figure 1. This figure is ~~UNCLASSIFIED//FOR OFFICIAL USE ONLY~~

(U//~~FOUO~~) The IMG functions are critical to the declassification programs. The IMG is responsible for, among other things, the NRO Records Center (NRC), the Information Management Operations Application (IMOA), the Records Control Schedule (RCS), and records management training. The NRC is a NARA-approved, secure, access-controlled, and climate-controlled record storage center equipped to preserve and protect approximately 41,000 cubic feet of records. The IMOA is a database that tracks the inventory of physical and electronic records retired to the NRC. The RCS is a NARA-approved schedule that governs the disposition of NRO records including the disposal of temporary records, the transfer of records to an authorized NRO records storage facility such as the NRC, and the possible transfer of permanent records to NARA. IMG provides records management training to NRO Program Records Officers (PROs) who are appointed by NRO Directorates and Offices (Ds and Os) to create the network of personnel responsible for record identification, retirement, and disposition.

(U//~~FOUO~~) The IRRG is responsible for the ADR, SDR, and MDR programs, as well as Freedom of Information Act and Privacy Act processing, and the Pre-Publication program. To accomplish its mission, the IRRG coordinates with internal customers/stakeholders (e.g., Ds and Os, CSNR, and Office of Congressional and Public Affairs (OCPA)) who have various roles in

the identification, declassification, and release of NRO information. In addition, the IRRG works closely with external customers/stakeholders (e.g., the Central Intelligence Agency (CIA), the National Geospatial-Intelligence Agency (NGA), and the National Security Agency (NSA)) to review and declassify records that contain their equities.

~~(U//FOUO)~~ Since significant amounts of the technology developed by the NRO, and the methodologies for employing that technology remain sensitive, the NRO sought and obtained approval from the ISCAP for 25- and 50-year exemptions from automatic declassification. The NRO Review and Redaction Guide (RRG)⁶ establishes the criteria for determining what 25- and 50-year-old NRO information shall be declassified and what NRO information must remain classified. The IRRG incorporates policy changes and necessary clarifications into the RRG on an ongoing basis, and coordinates those updates with the Ds and Os. The IRRG uses the RRG to apply 25- and 50-year exemptions in the ADR, SDR, and MDR programs.

(U) OBJECTIVES, SCOPE, AND METHODOLOGY

(U) The objective of the OIG inspection was to assess the effectiveness and efficiency of the NRO ADR, SDR, and MDR programs and their compliance with E.O. 13526 and NRO policies. The OIG conducted the pre-inspection and fieldwork between August 2013 and February 2014 in accordance with the Quality Standards for Inspections issued by the Council of Inspectors General on Integrity and Efficiency.

~~(U//FOUO)~~ To address the inspection objective, the OIG reviewed NRO declassification authorities, roles, responsibilities, applicable policies, and the execution of those policies. The OIG methodology included:

- tracing E.O. 13526 requirements to NRO documents and policies including the RCS, RRG, and relevant NRO Directives and Instructions;
- monitoring coordination between representatives of the Office of Policy and Strategy (OP&S), CIO, IMSO, Business Plans and Operations Directorate (BPO), CSNR, and OCPA regarding the clarification of NRO declassification authorities, roles, and responsibilities;
- obtaining and reviewing ISOO's 2011 assessment of the NRO's declassification program;
- touring the NRC and physically observing the records storage and retrieval process;
- interviewing PROs and observing the input and extraction of data in the IMOA system;
- testing the execution of the ADR, SDR, and MDR programs against the policies and procedures by selecting a judgmental sample of 25- and 50-year-old records processed for review between 2009 and 2013 for each declassification program;

⁶ ~~(U//FOUO)~~ The RRG is a document that requires approval by the ISCAP. In November 2012, the ISCAP approved NRO RRG version 2.0 for use in exempting information from automatic declassification at 25 and 50 years. The guide must be updated and submitted to the ISCAP, as circumstances require, but at least once every five years.

- obtaining and analyzing IMSO budget and staffing reports and reviewing the contractor statement of work;
- interviewing CIO, IMSO, IMG, and IRRG personnel;
- issuing a questionnaire to IRRG's internal and external customers/stakeholders and analyzing the responses;
- interviewing CSNR personnel regarding their working relationship with the IRRG; and
- benchmarking with CIA and NGA to compare processes and procedures and identify any potential best practices.

(U) INSPECTION RESULTS

~~(U//FOUO)~~ The OIG concluded that updated NRO declassification policies, which were amended to clarify declassification authorities, roles, and responsibilities, mitigate the concerns expressed by the former CIO and identified in our 2011 NRO OIG *Special Review of the CSNR*. However, in this inspection, we identified current weaknesses in the execution of the declassification programs and in a records management policy that impair the effectiveness and efficiency of the programs. Specifically, the IMSO does not adequately measure and monitor progress toward declassification program goals and use that data to evaluate how to improve the programs. In addition, unlike the SDR and MDR programs, the ADR methodology has not resulted in any declassified NRO information being made available to the public. Finally, current NRO records management policies fail to adequately communicate responsibilities for designating and training PROs who are vital to the records management and declassification programs. Without improvements, the CIO will be unable to assess his ability to meet declassification review deadlines. Improvements will also accomplish the desired effect of E.O. 13526, which is to protect information critical to the nation's security while demonstrating a commitment to open government. In addition, improvements will more effectively support the DNRO's goal to better communicate NRO mission, contributions, and history.

(U) Updated Policies and Authorities Resolve Outstanding Concerns

~~(U//FOUO)~~ During the 2011 *Special Review of the CSNR*, the NRO OIG noted process and policy concerns in connection with the declassification of various satellite programs. Specifically, declassification procedures were not consistently executed, and several NRO components were operating contrary to NRO policy. Furthermore, in 2013, the CIO, who had recently been assigned declassification responsibilities, reported that declassification authorities, roles, responsibilities were unclear, and that responsible NRO offices were struggling to revise NRO Directives and Instructions.

~~(U//FOUO)~~ To address these concerns, the OP&S, CIO, IMSO, BPO, CSNR, and OCPA collaborated with other stakeholders to update existing policies affecting declassification. These revised policies were issued in February 2014. Among other things, the revisions document NRO declassification authority delegation from the Director, NRO to the CIO.

NRO Directive (ND) 56-2, *Information Review and Release* (20 February 2014); and NRO Instruction (NI) 56-2-3, *25-Year Automatic, Systematic and Mandatory Declassification Review*⁷ (27 February 2014) now serve as the primary declassification policies. Based on these policy updates, and respective updates to CSNR directives and instructions, the OIG concluded that declassification authorities, roles, and responsibilities are now clear and enable the collaborative execution of the declassification programs.

(U) Execution of the Declassification Programs Must be Improved to Meet Declassification Objectives

~~(U//FOUO)~~ The IRRG's ADR, SDR, and MDR programs are compliant with E.O. 13526, but they must be better managed to provide reasonable assurance that program deadlines can be met and that resources are effectively employed to declassify as much information as possible. Specifically, the OIG determined that (1) the IRRG is not using program data to facilitate decision-making, improve processes, and evaluate program performance; (2) the IRRG's resource intensive ADR process results in minimal release of declassified information; and (3) current IMG records management Directives and Instructions do not adequately communicate the critical responsibilities for PRO designation and training which are vital to the declassification programs.

~~(U//FOUO)~~ Finding #1: The Information Review and Release Group is Not Using Program Data to Adequately Measure and Monitor Progress Toward Program Goals.

(U) As managers strive to achieve their missions and goals, they need to assess and evaluate how well they are performing and how they may improve. Government Accountability Office Standards for Internal Control in the Federal Government state that managers need to compare actual performance to planned or expected results and analyze significant differences. This type of performance analysis forms the basis for identifying and analyzing risks associated with achieving program objectives. These concepts are promulgated in ND 20-3, *Performance Management*, which states that NRO management and personnel at all levels shall routinely set and take accountability for specific, objectively measurable goals and targets for mission performance; regularly measure and monitor progress toward goals and targets as plans are implemented; and prudently modify improvement plans in light of the assessed progress.

~~(U//FOUO)~~ During the inspection, the OIG requested program data from IRRG on the number of records due for 25- and 50-year ADR between 2013 and 2019, and other quantitative data for the SDR and MDR programs. For the ADR program, the OIG asked that the records be sorted by year to gain an understanding of and analyze the volume of records in the system, the required time phasing of the reviews, and the resources required to perform the declassification work. For the SDR and MDR programs, the OIG requested the number of projects completed and caseload data. IRRG struggled to provide the requested data and acknowledged that it does not regularly measure and analyze such data on its programs.

⁷ ~~(U//FOUO)~~ NI 56-2-3 does not currently address the review of 50-year-old records; however, the ISOO recently provided initial guidance on processing 50-year-old records. Through testing, the OIG found that the review procedures are very similar to the 25-year-old records. Once IRRG thoroughly tests and approves the process for reviewing 50-year-old records, IRRG plans to formally document and publish the procedures.

(U//~~FOUO~~) Since IRRG does not measure and analyze program data, it is unable to assess project workload, resource requirements, or overall program performance. It also cannot provide reasonable assurance that program deadlines can be met. The IRRG could improve the NRO declassification programs by establishing measurable goals and collecting performance data against those goals to be used for workload management, resource allocation, and process improvement.

(U) Recommendation #1 for the Chief Information Officer: Establish measures of planned and actual declassification program performance that are important to identifying program risks and successfully achieving the mission.

(U//~~FOUO~~) Chief Information Officer Response: The CIO concurred with Recommendation #1.

(U) Finding #2: Resource Emphasis on the Automatic Declassification Review Program Results in Minimal Information Available to the Public on NRO Mission, Contributions, and History.

(U//~~FOUO~~) Although the IRRG's execution of the three declassification programs complies with E.O. 13526 and internal policies, the 25-year ADR methodology requires resource intensive labor and is neither efficiently nor effectively informing the public on NRO activities. In accordance with agreements with NARA, NRO records do not become eligible for possible transfer to NARA until they reach 50 years of age. However, the current ADR process expends substantial resources to review 25-year-old records that after review, even when marked for declassification, go back into a box in the secure NRC. Changes in the ADR methodology and a reallocation of IRRG resources to SDR would result in improved effectiveness and efficiency of the declassification programs.

(U//~~FOUO~~) In the most recent ADR, completed in 2011 for the years 1985 through 1989,⁸ IRRG personnel manually searched through over 16,700 folders in the NRC looking for papers, photographs, machine-readable materials, or other documentary materials (hereinafter referred to as items) responsive to the 25-year deadline. When the reviewers found a 25-year-old item, they reviewed it and tagged it with the NARA approved Standard Form 715⁹ and marked the appropriate sections on the form for eligibility for declassification or exemption from declassification. Then, in accordance with the NARA approved NRO RCS, the items were returned to the secure NRC, regardless of whether they were marked for declassification or exemption.¹⁰ IRRG personnel stated that it took two years to complete this effort. This methodology complies with the requirements in E.O. 13526, but it does little to release

⁸ (U//~~FOUO~~) This set of records was due for review between 2010 and 2014. The IRRG processed a five-year span of records as a means of meeting requirements and managing resources. The IRRG is planning to begin ADR on the next five-year span of records (1990-1994) in 2015.

⁹ (U) Standard Form (SF) 715 "Declassification Review Tab" is the only tab approved for use by agencies working with Federal records under the automatic declassification provisions of E.O. 13526.

¹⁰ (U//~~FOUO~~) As noted previously, the RCS governs the disposition of NRO records, including the possible transfer of permanent records to NARA. The 25-year-old records will be re-reviewed at the 50-year mark when they become eligible for possible transfer to NARA.

declassified information, which could better communicate NRO mission, contributions, and history.

(U//~~FOUO~~) Based on our analysis of E.O. 13526 and the current NRO ADR process, IRRG could be more efficient by conducting ADR at a higher level of review than the current practice of examining each item in a folder. E.O. 13526 defines an integral file block¹¹ and the provisions for declassifying file blocks. NRO folders meet the definition of an integral file block. Thus, the IRRG would utilize fewer resources conducting ADR at the folder level and still comply with the Executive Order. The IRRG could then reallocate some of the resources used for ADR to other declassification programs, particularly the SDR, which is supported by the IRRG and NRO stakeholders as explained below.

(U//~~FOUO~~) In 2009, the Public Interest Declassification Board published a report to the President on "Improving Declassification." This report advocated for SDR as a more effective method of identifying historically significant information within the vast body of information that must be reviewed and declassified by government agencies. SDR efforts at the NRO have been limited. The IRRG used the SDR process to publically release documents for the QUILL program, an experimental Synthetic Aperture Radar satellite from the 1960s. The QUILL collection, posted to the NRO public website in July 2012, contains 35 records (1,645 pages), including one audio file. IRRG, and several NRO stakeholders, support increased focus on SDRs and also seek improved coordination in the selection of historically significant NRO programs for SDR.

(U) IRRG should develop a more efficient and effective ADR process in order to reallocate resources to conduct additional SDRs and ultimately release more information to the public. In addition, a more focused SDR program may help to achieve the DNRO's goal of better communicating the NRO mission, contributions, and history.

(U) Recommendation #2 for the Chief Information Officer: Identify and implement more efficient and effective methods for reviewing and releasing 25- and 50-year-old records under the Automatic Declassification Review program with a goal towards increased emphasis on Systematic Declassification Reviews.

(U//~~FOUO~~) Chief Information Officer Response: The CIO concurred with Recommendation #2.

(U) Finding #3: Policies on Program Records Officers' Roles, Responsibilities, and Training Need to be Strengthened to Support the Records Management and Declassification Programs.

(U//~~FOUO~~) The NRO declassification programs rely heavily on the network of personnel responsible for record identification, retirement, and disposition. These personnel enter data into IMOA and package records into folders and boxes for retrieval, preservation, and storage in the

¹¹ (U) Integral file block means a distinct component of a file series that should be maintained as a separate unit in order to ensure the integrity of the records.

NRC. According to NRO Instructions,¹² these personnel are titled PROs. However, NRO policies and procedures are unclear as to the roles and responsibilities for PROs and the required training for personnel to obtain access to the IMOA system. Weaknesses in policies, procedures, and training impact the NRO's ability to access information when it is needed, and to preserve and declassify records in compliance with records management and declassification laws, regulations, and E.O. 13526.

~~(U//FOUO)~~ Under the NRO Governance Plan and NRO Business Functions (NBF), NDs define scope, authorities, and responsibilities, and NRO Instructions set forth-procedural implementation guidance. However, under NBF 50, *Information Technology, Information Assurance, and Information Management*, there is a flaw in the policy. ND 56-1, *Records Management*, does not define responsibilities for designating PROs. Yet, the procedural implementation guidance in the referenced Instructions state that the Chief, Director, or other designated person in charge of an NRO office will designate a PRO and keep the CIO informed when the designated PRO changes. This key responsibility for designating PROs and notifying the CIO has not been properly communicated in the Directive. Possibly due to this gap in policy, IMG struggles with varying levels of commitment to records management across the NRO, training PROs, and PRO turnover.

~~(U//FOUO)~~ Furthermore, the IMG training requirements for PROs are vague. NI 56-1-1, *Records Creation*, states that PROs must attend records management training provided by CIO within six months of being appointed and every three years subsequent to initial training. However, Instruction 56-1-1 is not specific as to which training courses are required to perform the duties of a PRO and which courses are required to obtain access to IMOA. Adding to the confusion, IMG internal PRO training tracking documents introduce additional categories of records management personnel (e.g., Assistant PROs, SharePoint Content Managers, and Supporters) who are not defined or described in the Instructions.

~~(U//FOUO)~~ PROs are critical to the Records Management and Declassification programs of the NRO. These personnel manage records that contain documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the NRO and records that contain information necessary to protect the legal and financial rights of the NRO as well as individuals directly affected by NRO activities. The policies that assign these responsibilities and the training for these personnel need to be clarified or the NRO may have challenges meeting its legal responsibilities.

(U) Recommendation #3 for the Chief Information Officer: Revise NRO Directive 56-1, *Records Management*, to assign responsibility for designating Program Records Officers and informing the CIO when designated Program Records Officers change.

~~(U//FOUO)~~ Chief Information Officer Response: The CIO concurred with Recommendation #3.

¹² (U) NRO Instructions 56-1-1, *Records Creation*; 56-1-2, *Records Maintenance and Use*; and 56-1-3, *Records Disposition and Preservation*.

(U) Recommendation #4 for the Chief Information Officer: Revise NRO Instruction 56-1-1, *Records Creation*, to clarify and communicate Program Records Officer training requirements that will ensure all appointed program records management personnel receive adequate training and access to the Information Management Operation Application.

~~(U//FOUO)~~ **Chief Information Officer Response:** The CIO concurred with Recommendation #4.

~~(U//FOUO)~~ **Other Matters to be Reported: IRRG's Customer/Stakeholder Outreach Activities Could Be Enhanced**

~~(U//FOUO)~~ A majority of IRRG customers/stakeholders are satisfied with the support provided by the IRRG and describe their working relationship with the IRRG as excellent. Based on the customer/stakeholder feedback, the OIG identified a few areas for IRRG to consider that could enhance program effectiveness. Customers/Stakeholders expressed a desire for:

- regularly recurring declassification overviews to customers/stakeholders to educate them on their roles and responsibilities as well as declassification processes;
- increased communication and collaboration with CSNR and OCPA on SDRs and MDRs; and
- increased interaction with external partners so that all could benefit from process improvements and synergy in the tools employed.

~~(U//FOUO)~~ The IRRG staff acknowledged that they could be more proactive in their customer outreach efforts—including communications with external entities. The benefits derived from more outreach could be significant; it could strengthen collaboration and public relations as well as allow for greater transparency into the decision-making process for declassifying NRO program records.

(U) APPENDIX A: Acronyms

(U) ADR	Automatic Declassification Review
(U) BPO	Business Plans and Operations
(U) CIA	Central Intelligence Agency
(U) CIO	Chief Information Officer
(U) CSNR	Center for the Study of National Reconnaissance
(U) Ds and Os	Directorates and Offices
(U) E.O.	Executive Order
(U) IMG	Information Management Group
(U) IMOA	Information Management Operation Application
(U) IMSO	Information Management Services Office
(U) IRRG	Information Review and Release Group
(U) ISCAP	Interagency Security Classification Appeals Panel
(U) ISOO	Information Security Oversight Office
(U) IT	Information Technology
(U) MDR	Mandatory Declassification Review
(U) NARA	National Archives and Records Administration
(U) NBF	NRO Business Functions
(U) ND	NRO Directive
(U) NI	NRO Instruction
(U) NGA	National Geospatial-Intelligence Agency
(U) NRC	NRO Records Center
(U) NRO	National Reconnaissance Office
(U) NSA	National Security Agency
(U) OCPA	Office of Congressional and Public Affairs
(U) OIG	Office of Inspector General
(U) OP&S	Office of Policy and Strategy
(U) PRO	Program Records Officer
(U) RCS	Records Control Schedule
(U) RRG	Review and Redaction Guide
(U) SDR	Systematic Declassification Review

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(U) APPENDIX B: List of Recommendations

(U) Recommendation #1 for CIO:

(U) Establish measures of planned and actual declassification program performance that are important to identifying program risks and successfully achieving the mission.

(U) Recommendation #2 for CIO:

(U) Identify and implement more efficient and effective methods for reviewing and releasing 25- and 50-year-old records under the Automatic Declassification Review program with a goal towards increased emphasis on Systematic Declassification Reviews.

(U) Recommendation #3 for CIO:

(U) Revise NRO Directive 56-1, *Records Management*, to assign responsibility for designating Program Records Officers and informing the CIO when designated Program Records Officers change.

(U) Recommendation #4 for CIO:

(U) Revise NRO Instruction 56-1-1, *Records Creation*, to clarify and communicate Program Records Officer training requirements that will ensure all appointed program records management personnel receive adequate training and access to the Information Management Operation Application.

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(U) APPENDIX C: Management Comments



~~UNCLASSIFIED//FOUO~~
NATIONAL RECONNAISSANCE OFFICE
14875 Lee Road
Chantilly, VA 20151-1715

9 October 2014

MEMORANDUM FOR INSPECTOR GENERAL

SUBJECT: (U) Inspections of National Reconnaissance Office
Declassification Activities - Strategic Remediation Plan.

REFERENCE: (U) Inspection of NRO Declassification Activities Project
Number 2013-00548, 21 Aug 14

(U) Thank you for the opportunity to review and comment on the referenced draft report. I have reviewed the draft report and concur with the findings and recommendations. The attached document provides the remediation plan for Recommendations 1 through 4.

For the sake of contact is [REDACTED]

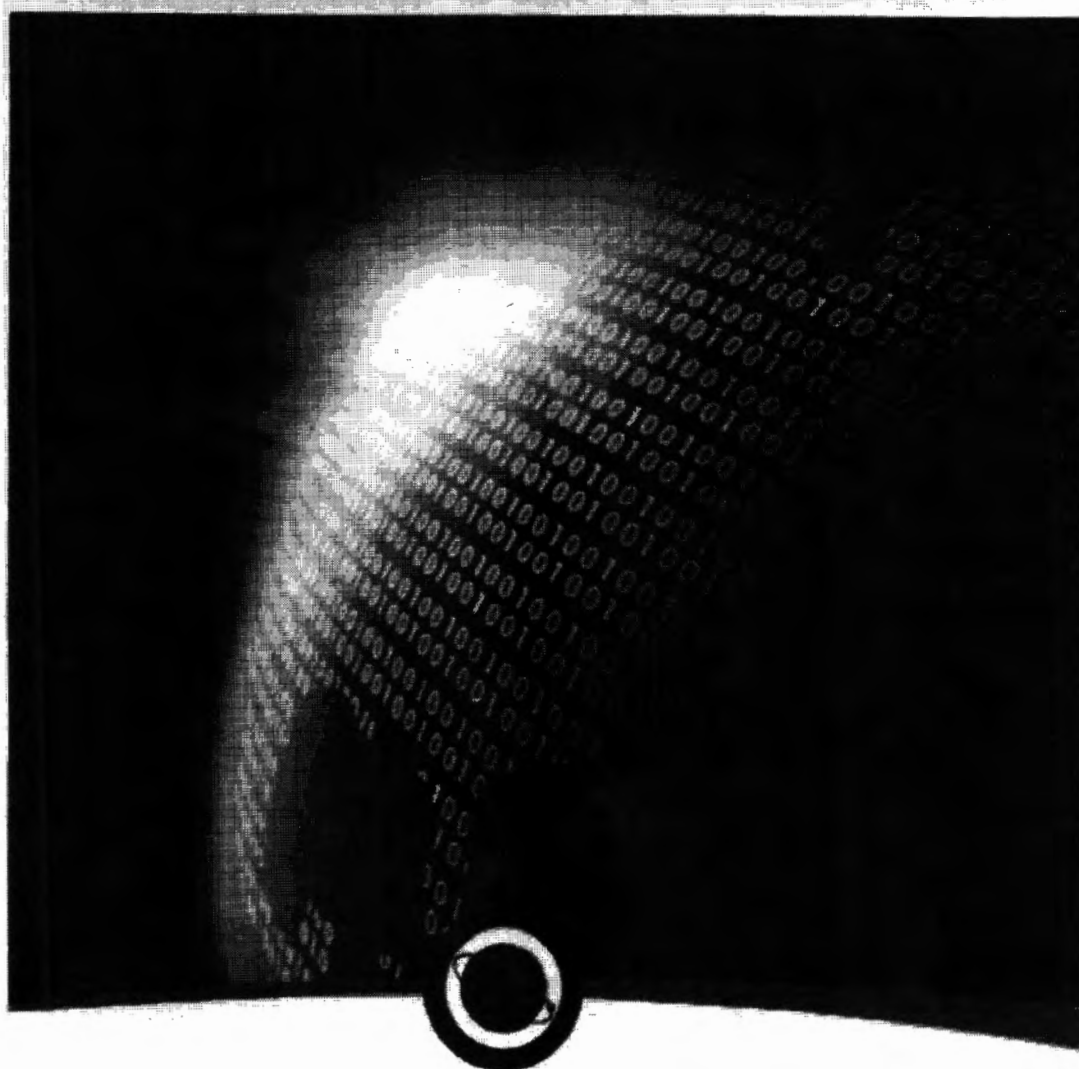
(b)(3) 10 USC \pm 424

[REDACTED]
Terry S. Duncan
Chief Information Officer

(b)(3) 10 USC \pm 424

Attachment:
(U//~~FOUO~~) Inspection of NRO
Declassification Activities
- Strategic Remediation Plan

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**Inspection of National Reconnaissance Office
Declassification Activities
Strategic Remediation Plan**

NATIONAL RECONNAISSANCE OFFICE

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Inspection of NRO Declassification Activities - Strategic Remediation Plan

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Inspection of NRO Declassification Activities - Strategic Remediation Plan

(U) Purpose

(U) This document is intended to provide an overview of the approach to addressing areas of concern outlined in the *Inspection of National Reconnaissance Office (NRO) Declassification Activities*. It will provide specific measurable actions that will be taken to address these concerns.

(U) Background

(U) In March 2014, the NRO Inspector General (IG) completed an *Inspection of NRO Declassification Activities*. The inspection found three areas of concern. First, the Chief Information Office (CIO) Information Management Services Office (IMSO) is not using program data to measure and monitor progress toward program goals. Second, the IMSO employed a resource intensive Automatic Declassification (AD) process that results in minimal information available to the public and NRO mission, contributions, and history. Third, IMSO has not adequately documented roles and responsibilities, and training for Program Records Officers in NRO records management policies.

(U//FOUO) **Finding 1:** The Information Review and release Group (IRRG) does not measure and analyze program data; it is unable to assess project workload, resource requirements, or overall program performance. It also cannot provide reasonable assurance that program deadlines can be met. The IRRG could improve the NRO declassification programs by establishing measurable goals and collecting performance data against those goals to be used for workload management, resource allocation, and process improvement.

(U//FOUO) **Finding 2:** The current AD process expends substantial resources to review 25-year-old records that after review, even when marked for declassification, go back into a box in the secure NRO Records Center. IRRG should develop a more efficient and effective AD process in order to reallocate resources to conduct additional Systematic Declassification Reviews (SDRs) and ultimately release more information to the public. In addition, a more focused SDR program may help to achieve the Director, NRO's goal of better communicating the NRO mission, contributions, and history.

(U//FOUO) **Finding 3:** The policies that assign Program Records Officers (PRO) responsibilities and the training for these personnel need to be clarified or the NRO may have challenges meeting its legal responsibilities.

(U) The above findings resulted in four recommendations to strengthen identified weaknesses in the execution of the declassification programs and increase effectiveness and efficiency of the programs:

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Inspection of NRO Declassification Activities - Strategic Remediation Plan

1. (U) Establish measures of planned and actual declassification program performance that is important to identifying program risks and successfully achieving the mission;
2. (U) Identify and implement more efficient and effective methods for reviewing and releasing 25-year old and 50-year-old records under the AD program with a goal towards increased emphasis on SDRs;
3. (U) Revise NRO Directive (ND) 56-1, Records Management, to assign responsibility for designating Program Records Officers and informing the Chief Information Officer when designated PROs change; and
4. (U) Revise NRO Instruction (NI) 56-1-1, Records Creation, to clarify and communicate PRO training requirements that will ensure all appointed program records management personnel receive adequate training and access to the Information Management Operation Application (IMOA).

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Inspection of IRRG Declassification Activities - Strategic Remediation Plan

(U) Activities, Milestones, Risks, and Dependencies

The following section provides specific milestones and deliverables related to each of the recommendations included in the inspection report.

(U) Finding 1: The IRRG is not using program data to adequately measure and monitor progress toward program goals.

(U) Recommendation 1: Establish measures of planned and actual declassification program performance that are important to identifying program risks and successfully achieving the mission.

OPR: C/IRRG

Milestones	Planned Activity
Q4 FY 2015	Develop new process for ADR review at a less resource-intensive level, consistent with available program data. Consult with Information Security Oversight Office (ISOO) re: best practices for a lower level of review (i.e., either at the box- or folder-level), consistent with available program data; Meet with ISOO regarding way forward; and Implement new, agreed-upon review process
Q4 FY 2015	Train several IRRG members on IMOA so that they can access program data to monitor progress against goals; and
Q4 FY 2015	Develop a plan to use available program data to forecast workload & resource needs for all three declassification programs.
Dependencies (D) / Risks (R) / Mitigations (M)	
(D) IRRG is somewhat dependent upon ISOO to agree to a lower level of review and to provide best practices for implementation of new process.	

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Inspection of NRO Declassification Activities - Strategic Remediation Plan

(U) Finding 2: Resource Emphasis on the ADP Results in Minimal Information Available to the Public on NRO Mission, Contributions, and History.

(U) Recommendation 2: Identify and implement more efficient and effective methods for reviewing and releasing 25-year old and 50-year-old records under the ADP with a goal towards increased emphasis on SDRs.

OPR: C/IRRG

Milestone Dates	Planned Activity
Completed	Reduce ADR levels from three to one (plus Quality Assurance/Quality Control) to free-up resources;
Completed	Reduce # of reviewers doing ADR from four to two; dedicate two reviewers to SDRs/Mandatory Declassification Reviews (MDRs) and use other two as available
Q4 FY 2015	Implement two new "mini" SDR programs to increase release volume and frequency;
Q4 FY 2015	Implement process for more proactive (and retroactive) releases of 25-year-old material processed in other release programs (Freedom of Information Act and MDR); and
Q4 FY 2015	Release Manned Orbiting Laboratory SDR.
Dependencies (D)/Milestones (M)/Mitigations (M)	

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Inspection of NRO Declassification Activities - Strategic Remediation Plan

(U) Finding 3: Policies on PROs' Roles, Responsibilities, and Training Need to be strengthened to Support the Records Management and Declassification Programs.

(U) Recommendation 3: Revise ND 56-1, Records Management, to assign responsibility for designating PROs and informing the Communications Systems Directorate when designated PROs change.

(U) Recommendation 4: Revise NI 56-1.1, Records Creation, to clarify and communicate PRO training requirements that will ensure all appointed program records management personnel receive adequate training and access to the IMOA.

OPR: C/IRRG

Milestone Dates	Planned Activity
Q1 FY 2015	Revise ND 56-1 to meet Inspector General (IG) recommendation and submit policy for coordination and publication.
Q1 FY 2015	Revise NI 56-1.1 to meet IG recommendation and submit policy for coordination and publication.
Dependencies(D)/Risks(R)/Mitigations(M)	

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Inspection of MRD Declassification Activities - Strategic Remediation Plan

(U) Acronym List

Acronym	Definition
ADR	Automatic Declassification Review
CIO	Chief Information Office
IMOA	Information Management Operation Application
IMSO	Information Management Services Office
IRRG	Information Review and Release Group
ISOO	Information Security Oversight Office
MDR	Mandatory Declassification Review
NRO	National Reconnaissance Office
PRO	Program Records Officer
SDR	Systematic Declassification Review

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