



Office of the Chief
Records Officer for the
U.S. Government

Sent Via Email. No Hard Copy to Follow.

March 25, 2024

Brenda Alexander
Department of the Treasury
Bureau of the Fiscal Service
Room 135, PGMC-II
3700 East-West Highway
Hyattsville MD 20782

Dear Brenda Alexander,

During our review of the proposed agency records schedule, DAA-0425-2024-0001, it has come to our attention that the Bureau of the Fiscal Service has been digitizing records of the Foreign Loan program and the Lend-Lease Program and destroying the source records after digitization. Since these records are being destroyed without a records retention schedule, this constitutes an unauthorized destruction of federal records.

In accordance with 36 CFR 1230.14(a), NARA is requesting that BFS review this matter and submit to NARA a report regarding the unauthorized destruction of these records. Your report must include:

- A complete description of the records that have been digitized and are being digitized with volume and date spans if known;
- The office maintaining the records;
- A statement of the exact circumstances surrounding the removal, defacing, alteration, or destruction of records;
- A statement of the safeguards established to prevent further loss of documentation; and
- When appropriate, details of the actions taken to salvage, retrieve, or reconstruct the records.

We have additional concerns as to how these records are being digitized, how they are being stored and maintained, and the inclusion of appropriate metadata so that they can eventually be transferred to the custody of the National Archives at the end of their retention period.

Additionally, your report to NARA should also document the impact on the permanent records that have been digitized, including:

- A complete description that identifies whether the digitized records are complete, if there are any gaps in coverage or missing records, the presence of any mixed-media records, the date range when the records were created, and any access or use restrictions that apply to the records.
- A complete description of how the digitized records are stored, including the systems and locations.
- A complete description of the digitization process including their quality control and quality assurance processes. This should also include any policies or procedures FMS uses to document their digitization process and what digitization standards FMS applies during their process.
- A complete description of BFS's plans to ensure that any future digitization meets the standards set forth in 36 CFR 1236, Subpart E. These plans must also include storage and maintenance strategies for these records, as set forth in 36 CFR 1236, Subparts B and C.

Additionally, until this matter is resolved, BFS must cease destruction of any source records after they have been digitized. Digitization and disposal of source records may only occur if FMS is meeting all requirements for digitization as set forth in 36 CFR 1236, Subpart E, along with an approved disposition authority (either a GRS or a NARA-approved agency records schedule).

I appreciate your attention to this matter. If you have any questions or wish to discuss further, please contact me at laurence.brewer@nara.gov.

Sincerely,

A handwritten signature in blue ink that reads "Laurence Brewer".

LAURENCE BREWER
Chief Records Officer
for the U.S. Government

cc: Anna Canfield Roth, Acting Senior Agency Official for Records Management, Assistant Secretary for Management, Department of the Treasury



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June 24, 2024

Brenda Alexander
Department of the Treasury
Bureau of the Fiscal Service
Room 135, PGMC-II
3700 East-West Highway
Hyattsville MD 20782

Dear Brenda Alexander,

The National Archives and Records Administration (NARA) has received the Bureau of Fiscal Service (BFS)'s report regarding the allegation of unauthorized disposition of Foreign Loan and Lend Lease Program (FLLLP) records.

We understand that the records at issue are covered by Item 179 of Fiscal Service records control schedule N1-425-91-001 for "International Monetary Fund, International Loans, (and) supporting documents." These records are considered temporary and have a retention period of six years and three months old. Since the records were destroyed after digitization and the records retention period of the source records had passed, no unauthorized disposition occurred.

Based on the fact that this set of records is being digitized and the retention period for these records has lapsed, BFS may resume destroying the source records. Please note that if BFS is currently digitizing any permanent records, BFS is required to follow requirements in 36 CFR 1236 in regards to digitizing records.

Based on the information you have provided, we consider this matter to be unfounded. I appreciate your attention to this matter. If you have any questions or wish to discuss further, please contact me at laurence.brewer@nara.gov.

Sincerely,

A handwritten signature in blue ink that reads "Laurence M. Brewer". The signature is written in a cursive style with a large initial 'L'.

LAURENCE BREWER
Chief Records Officer
for the U.S. Government

cc: Anna Canfield Roth, Acting Senior Agency Official for Records Management, Assistant Secretary for Management, Department of the Treasury