

November 14, 2017

Laurence Brewer
U.S. Chief Records Officer
National Archives and Records Administration
700 Pennsylvania Avenue, NW
Washington, DC 20408

Re: Improving Management of Federal Web Records

Dear Mr. Brewer,

On behalf of the undersigned organizations concerned with government transparency, we encourage the National Archives and Records Administration (NARA) to update its Guidance on Managing Web Records¹ and take other actions in order to better protect the public's access to government information. In light of recent controversies regarding changes to federal website content, we believe that updated guidance from NARA at this time could promote agency compliance with the Federal Records Act (FRA) and increase public confidence that government records are being properly managed.

Thank you for your leadership in initiating a review of the guidance. We appreciated the opportunity to meet with you and your team recently to discuss our ideas for improving the guidance. To assist in your review, we offer the following recommendations:

1. Issue clear policy guidance on agency responsibilities
2. Manage web records in line with their value
3. Emphasize managing web records for public access
4. Modernize approach to "snapshots" and web archiving
5. Increase transparency of records scheduling

1. Issue clear policy guidance on agency responsibilities

NARA's 2005 guidance is 28 pages long. We believe that more succinct policy guidance on agencies' responsibilities would better promote agency compliance. We suggest that NARA issue shorter updated guidance focusing on agency responsibilities.² Additional technical details and

¹ National Archives and Records Administration, "NARA Guidance on Managing Web Records," January 2005, <https://www.archives.gov/records-mgmt/policy/managing-web-records-index.html>.

² One option for the format of guidance would be as a NARA Bulletin; <https://www.archives.gov/records-mgmt/bulletins>.

practical suggestions, such as selected examples of approved schedules for web records, could be included in attachments to the guidance.

In addition to guidance, we encourage NARA to update its records management regulations to more clearly explain agencies' essential responsibilities for managing web records. Currently, NARA's records management regulations include few references to web records.³ By comparison, the regulations contain an entire part dedicated to microform records.⁴ Given the ways that web records are distinct from other types of records, we believe it would be appropriate to discuss web records more thoroughly in the regulations. Even if NARA updates its guidance, regulations have greater visibility and may carry greater weight with agencies than guidance. Updated regulations could reinfo

access to web records can negatively impact important Federal and non-Federal activities. The guidance or attachments should suggest practical considerations when an agency is considering significant changes to web content.

When agencies or NARA hold archived web records that may be of interest to the public, we encourage them to make the archives publicly available online.

While primary responsibility to manage web records under the Federal Records Act lies with agencies, we believe that web archiving activities outside the agency also play important roles. Non-agency web archiving, such as by the Federal Web Archiving Working Group and Archiving Worki