

GAO's 1981 Recommendation for Retention Changes

In 1981 the General Accounting Office(GAO) analyzed the records management problems at the Passport Office and made [recommendations](#) for how the system could be improved. Though the recommendations do show that the General Services Administration (GSA) and Archivist had for a long time pressured the Department of State to change its retention periods and could thus be seen as supportive of the claims in an alleged 1985 [cable](#) from the State Department describing a change in retention periods and destruction of passport application records in the early '80's, there are some things that actually reveal problems with the claims in that alleged cable.

1. Only the State Department has the authority to alter retention periods, and the GSA was not able to convince the State Department to change them.

It is clear in these recommendations that there was a sharp and unrelenting disagreement on the need for the 100-year retention of passport applications. But though the GSA had tried long and hard to convince the State Department to change things, they were ultimately not able to budge the State Department, who alone had the authority to **alter** existing retention periods. On pp 40-41 of the [PDF](#) the report says,

“GSA has encouraged the State Department to reduce its holdings of passport files for many years. Numerous discussions have taken place to improve passport records storage and file retrievals. The biggest difficulties have been encountered with records originating prior to 1971 when disposable and permanent records were filed together in passport application files. ...Retention schedules for Federal records are set by the originating agencies and are approved by GSA. GSA has no authority to alter the retention period of records without agency consent but does offer guidance in determining them. GSA's efforts to persuade the Passport Office to retain passport records for shorter periods have not been effective.”

2. The GAO Office lists no further action taken to implement these recommendations.

The Government Accountability Office has this document [listed](#) on their site but all the recommendations are listed as “In process” rather than open, closed-implemented, or closed-not implemented. No director or contact information is listed for this project. Requests to the GAO for an update on the status of these recommendations have not been answered as of this date.

3. The chronology in the cable doesn't seem to match either the GAO Recommendations or history.

The alleged 1985 cable says (emphasis mine):

*“Since the late 1960's the General Services Administration had pressured the Bureau of Consular Affairs to reduce the volume of passport applications and related records stored at FRC. At that time, original passport records were retained for a period of 100 years. The retention period was **subsequently reduced** to twenty years for 10-*

year applications and fifteen years for 5-year applications. In 1982, after consulting with all primary bureau file users, the CA bureau decided to reduce the holdings of records at FRC by eliminating all non-permanent, routine records, retaining those records of permanent significance including those containing information on, or documentation of, citizenship."

The timeline suggested by this cable suggests that sometime between the late 1960's and 1982 the retention period was changed from 100 years to 20 years (for 10-year applications) and 15 years (for 5-year applications). And then in 1982 it was decided to destroy records based on those new retention periods.

But the actual [effective date](#) for the increase to a 10-year validity was on January 1, 1983 – AFTER the cable suggests they made the decision to destroy the records based on the retention changes. The GAO did not make recommendations regarding 10-year passport applications because as of August 1981 they only said that the State Department was requesting permission to extend the maximum validity period for passports from 5 years to 10 years (page 19 of the [PDF](#))

And the retention schedules refute the claim in the alleged cable. The disposition records show that the retention periods for paper passport applications before microfilming began were reiterated as 100 years shortly before the GAO Report, in [1980](#) (the filing number shows 1979 because it was REQUESTED in 1979). A later [2004](#) request for disposition of all passport records refers back to that 1980-approved disposition as the authority (though the section on the 2004 request pertaining to records before 1971 was withdrawn as it incorrectly stated the retention period was 50 years). The [1997](#) disposition shows the 100-year retention period but has the pre-1971 records crossed out because there was no requested change from the 1979/80 disposition.

So the disposition approved in 1980 was cited in both 1997 and 2004 as the governing disposition. If the disposition had been changed to 15 years in 1982 and then back to 100 sometime after 1985 (as the claims on the alleged cable would demand) the post-1985 disposition change would have been cited as the authority in both 1997 and 2004.

4. The priorities in the GAO Report make it highly unlikely that retention periods were ever changed for 10-year passports, as claimed in the alleged cable.

The GAO Report expresses no concerns at all for the storage space required for microfilmed records. There were no 10-year passports until January of 1983, and paper records had been required to be microfilmed since 1978 so all the 10-year passports would be microfilmed. Paper copies were required to be retained only 15 years so the cable's alleged reduction to a 20-year retention period could not be for the paper records, since that would actually be an INCREASE in retention period. The GAO did not at any point recommend that microfilms be retained for a shorter period of time.

The actual recommendation that the GAO made for microfilmed records was that the already-microfilmed paper documents be retained for only 5 years rather than 15, so

if there had been a reduction in retention period for 10-year passports based on GAO recommendations, the retention period for microfilmed paper records for 10-year passports would have been 5 years, not 20.

This cable’s inclusion of the claim regarding a reduction in retention time for 10-year passport applications being reduced is almost certainly a total fabrication because of the impossible timeframe claimed and because the GAO recommended no reduction in microfilm retention periods and recommended that paper records that had already been microfilmed be saved for 5 years rather than 15. Saving them for 20 years would be an INCREASE, not a decrease.

5. The records to be retained on the alleged 1985 cable don’t match either the GAO’s recommendations or the current retention schedules.

On p 41 of the [PDF](#) it says:

“Federally issued vital records consisting of Reports of Birth of American Citizens Abroad, Certificates of Witness to Marriage, Certificates of Loss of Nationality, and Oaths of Repatriation are maintained as original documents and are only available from the Department's files. These specific documents are the only ones considered by GSA and the State Department to be permanent records. All other records within the application files are disposable.”

Looking in the chart below you can see the distinctions that are made in the alleged 1985 cable marked out in yellow – most of which don’t match either the recommendation from the GSA or the current retention period. They stick out like a sore thumb.

Retention Periods for Records 1925-1970 (Color Code below)

Distinction made in GSA Recommendation

Distinction made in Alleged Cable

Distinction made in Current Retention Schedule

	GSA Rec	Cable	Current
Reports of Birth/American Citizens Born Abroad	perm	perm	perm
Certificates of Witness to Marriage	perm	perm	perm
Certificates of Loss of Nationality	perm	perm	perm
Oaths of Repatriation	perm	-	perm
Reports of Death	15 yr	perm	100 yr
Apps with delayed BC/special registrations	15 yr	perm	100 yr*
Secondary evidence of birth/identity attached	15 yr	perm	100 yr*
Apps of Foreign born citizens	15 yr	perm	100 yr*
Apps including foreign born citizens	15 yr	perm	100 yr*
Women acquiring citizenship through marriage	15 yr	perm	100 yr**
Apps to resume citizenship	15 yr	perm	100 yr**
Apps to take oath of allegiance & renunciation of svc	15 yr	perm	100 yr**
Apps for identity cards or for border crossing	15 yr	perm	100 yr**
Registration applications	15 yr	perm	no disposition
Philippine passport records	15 yr	perm	100 yr*
Look-out cases	15 yr	perm	no disposition
Possible loss, non-acquisition, non-retention, denials			
Limitations, revocations, questionable citizenship	15 yr	perm	no disposition
Fraudulent citizenship or fraudulent use of passport	15 yr	perm	100 yr*
Outstanding loans	15 yr	perm	100 yr
Classified files	15 yr	perm	100 yr
Routine Apps for Native Born Citizens	15 yr	15 yr	100 yr

Routine Renewal Apps	15 yr	15 yr	100 yr*
Routine Native Born Apps w Previous PP as ev.	15 yr	15 yr	100 yr*
Correspondence of non-citizenship nature	15 yr	15 yr	100 yr**
Charge out sheets before 1969	15 yr	15 yr	100 yr

*Passport applications	15 yr	15 yr	100 yr
Application for Amendment or Extension of Passport	15 yr	15 yr	100 yr
**Supporting forms, documents, and correspondence	15 yr	15 yr	100 yr

6. The “batches” mentioned in the alleged cable don’t match the filing system in use at the time, the alleged 15-year retention period, the current retention schedule, or the GSA recommendations.

The project “batches” mentioned in the cable are for applications ranging from:
 April 1925 through November 1961
 Dec 1961 through Dec 1965
 Jan 1966 through Dec 1968

But Chapter 3 of the GAO Recommendations (p 28 of the [PDF](#)) describes the filing system (paragraphs and emphasis are added to clarify the dates on the various filing systems):

“From 1906 to 1925 the passport application files were arranged in numerical order.

Between 1925 and May 1955, the Department operated a file system for their passport applications in strict alphabetical sequence. However, the alphabetical filing system was prone to heavy filing backlogs and a misfile rate of nearly 30 percent.

In 1955, at the recommendation of GSA's National Archives and Record Service, the Department implemented the Modified Alphabetic Drop filing system. Under this system, incoming passport applications were not placed in strict alphabetical order, as was done previously, but were manually sorted into alphabetical ranges and ultimately dropped into approximately 150,000 file folders that were maintained chronologically. This system was in use until 1978 when it was replaced by the automated PFM system that uses microfilm and computer technology to store passport application information more efficiently.

On page 28 of the [PDF](#) it is stated that the way that the records were filed in these various time blocs means that none of the records can be destroyed until the retention period for the entire bloc has been met:

The earliest disposable records are dated 1925. However, 1925 records are arranged alphabetically with other application records up to 1940, and since these records are under a 100-year retention schedule, they will not be eligible for destruction until the year 2041. Likewise, records from 1941 to 1955 are scheduled to be held until 2056. The remaining application files up to 1978 follow a similar retention pattern up until the year

2079.

So Phase One of the project ending with November of 1961 makes no sense, given the different filing systems they had. The sensible groupings would be to sort out

1. The strict alphabetical filing system first (covering 1925 to May 1955, a 30-year period), and then...
2. Sort out the modified-drop filing system June 1955 through 1978, although in 1985 with an alleged 15-year retention period the stopping point for the clean-up should be through 1970. That is the natural cut-off point referred to in both the GSA recommendations and in the current disposition records anyway, because in 1971 they began filing permanent records separately. Cleaning through 1970 would result in all the files having permanent and disposable records segregated as the GSA had recommended. This phase would cover 15 booming years of applications, so each of these 2 phases would cover roughly half the work of the entire project .

The dates of 1961, 1965, and 1968 make no sense with the filing system, with the alleged 15-year retention period, or with the GSA's recommendations. And they don't explain why routine passport applications from 1953 (Jacobsen), 1955 (Jacobsen), 1956 (Jacobsen), 1956 (another Jacobsen), 1967 (Obama's mother), and 1968 (Obama's mother) were all still available in 2009-2010.

The arbitrary cut-off dates from the cable are even more problematic given the way the records from mid-1955 through 1978 were filed. In miniature it would look like this: Label 26 folders with each letter of the alphabet. When you get an application for a passport for Smith, drop it in the S folder. When you get a passport for Sanders drop it in the S folder right behind Smith. When you get Adams drop it in the A folder. Etc. When a folder gets full start a new one.

On p 29 on the [PDF](#) it says:

“Aggravating the system was the practice of refiling a pulled application in a current block of records instead of the year in which it was originally filed. This practice often necessitated multiple year searches before a file could be located.”

On page 40 of the [PDE](#), a summary of the problem says:

“Each request, on the average, required about three separate searches before the file requested was located. File searching is hampered by the sheer volume of records and by the inadequacies of the old manual file system that were discussed in chapter 3.”

Given that communications and accompanying documentation might have different dates than the original application, and that applications themselves were often filed according to when they were last accessed, even knowing what the application date **was** for associated documents would be problematic – much less keeping track of

an arbitrary cut-off time such as Dec 1, 1961. If a “record” was all the documents related to a particular application, keeping the dates straight could be a major problem.

On the other hand, if a “record” was simply each paper document, then there could be stray documents that have no application to be associated with because the date on the application fell within the arbitrary destruction deadline but the date on the associated document didn't. So the application would be destroyed and the supporting documents would be orphaned.

7. Choosing a 1968 end to the culling project defies the natural groupings inherent in the GSA Recommendations and the current retention schedule.

To understand the distinctions that are made in both the GSA Report and the current retention schedules, you need to know what changes happened at the Passport Office for those years. The major developments:

- 1971** permanent vital records filed separately from the disposable (retention 100 years) applications,
- 1978** microfilming and PIERS
- 1983** 10-year passports

Because of those changes, the current [retention schedule](#) groups the records (including passport applications) according to those dates, because the applications for those time periods share important records-management characteristics, which I emphasize in bold. Current retention periods are in parentheses. Just look at the bold words to see what changed, to make a new bloc of records in the retention schedules.

1955 – 1970 5-yr max, paper records (100 yrs), **permanent vital records attached,**
filed by modified alpha-drop

1971 - 1977 5-yr max, Paper records (100 yrs), **permanent vital records filed separately,**
filed by modified alpha-drop,

1909 – 1978 Index cards for passports issued (100 yrs), **microfilmed** (100 yrs)
Transferred immediately to WNRS, filed alphabetically

1978 – 1982 5-yr max, Paper records (15 yrs), **microfilmed** (100 yrs),
filed by PIERS (electronic)

1983 – 1999 **10-yr max**, paper records (15 yrs), microfilmed
Transferred to WNRS weekly and monthly
Filed by PIERS (electronic)

So as you can see, ending the project with the 1968 records leaves the 1969 and 1970 records belonging nowhere. The 15-year retention period should mean that in 1985 (when the alleged cable was written) the plan would be to clean up the records through 1970, which would mean the cleaning was up-to-date and all the permanent records were separated from the non-permanent records, as the GSA had recommended. It is truly bizarre that the project would end after 1968 in defiance of the alleged 15-year retention period and leaving 2 years dangling, uncompleted.

In Conclusion, though the GAO Recommendations support the general statements in the alleged cable, a closer look at the details shows that the details of the cable don't match either the GAO Report, the retention schedules, the cable's own claimed retention schedule, the factual timeline of events, or the routine documents already retrieved in FOIA requests. In particular, the report calls into question

- 1. Whether the recommendations were ever followed.**
- 2. Whether the timeline in the "cable" was possible.**
- 3. Whether the "cable" sorted things by retention criteria at all.**
- 4. Whether the phases of the destruction described in the cable were even possible given the different filing systems – much less reasonable.**
- 5. Whether the project leaving out the 1969 records matches any of the goals of either the Passport Office or the GAO's report.**