March 26, 2020

The Honorable John Kennedy
Chairman
Subcommittee on Financial Services and General Government
Senate Committee on Appropriations
Washington, D.C. 20510

Dear Mr. Chairman:

The Administration has recommended funding of $356.9 million for the National Archives and Records Administration (NARA) Operating Expenses (OE) in fiscal year 2021, which is a reduction of $2.1 million from the FY 20 level of $359 million. The National Coalition for History (NCH) urges OE funding at a level of $395 million for FY 21.

The Administration is proposing elimination of the National Historical Publications and Records Commission (NHPRC) grants program. NCH urges the subcommittee to reject this proposal and to support funding for NHPRC at a level of $7 million. The NHPRC received $6.5 million in FY 20.

The National Coalition for History (NCH) is a consortium of more than 50 organizations that advocates and educates on federal legislative and regulatory issues affecting historians, archivists, political scientists, documentary editors, teachers, students, genealogists, and other stakeholders.

Thank you for the opportunity to submit our views on the National Archives and Records Administration’s (NARA’s) proposed fiscal year (FY) 2021 budget. As researchers and conservators of American history and culture, we care deeply about the programs and activities of the National Archives and the National Historical Publications and Records Commission (NHPRC).
The budget request for NARA’s operating expenses (OE) in FY 21 is $356.9 million, which is $2.1 million less than the FY 20 level of $359 million. As recently as FY 18, NARA’s OE budget was $385 million. In inflation-adjusted dollars, NARA’s OE budget has been stagnant for more than a decade. No government agency can absorb such significant decreases in funding without concomitant decreases in public services. Current funding levels are not adequate to serve legitimate public needs for accessibility and government accountability. American citizens rely on access to immigration and naturalization and census records (held by NARA) to conduct daily activities. Veterans and their families rely on military records (held by NARA) to gain access to their benefits. And in recent years, NARA has been forced to cut back on public services and research hours at its facilities because of lack of funding.

We understand that Congress continues to face enormous fiscal challenges in crafting the federal budget for FY 21. Although we’ve come to expect cuts as a result of these tight budget parameters, the budget request disproportionately affects programs at the National Archives that facilitate public access to the agency’s holdings and provide citizens with the historical context to appreciate and understand our country’s heritage. Increased federal spending for archives is necessary to manage, preserve, and make accessible the federal government’s records.

We repeatedly hear the adage that, like all federal agencies, NARA must “learn to do more with less.” But the reality is that the National Archives has, in fact, been doing more with less since it gained its independence from the General Services Administration in 1985. In fact, NARA currently has fewer full-time equivalents (FTEs) than in 1985. For too long Congress and the administrations of both parties have, unfortunately, come to treat NARA as a mere housekeeping agency—one that makes sure the Charters of Freedom are safe, that records are processed and stored in an orderly fashion so that a perceived limited universe of stakeholders can access them.

During the past decade, NARA has taken on the added responsibility of setting policy for, and providing oversight of, the government’s classification system—covering 71 federal agencies—through its Information Security Oversight Office (ISOO). It has added a Freedom of Information Act ombudsman, the Office of Government Information Services. It has added a National Declassification Center to expedite the release of classified records to researchers and the public. Its Office of the Chief Records Officer provides guidance and information to federal agencies in meeting the enormous technological challenge to manage federal records, in both paper and electronic formats. NARA is also continuing to develop and implement an Electronic Records Archive to preserve federal records and to address the proliferation of electronic records. At the same time NARA has dealt with an exponential increase in the number of non-electronic archival records that it has had to process.

In 2019, NARA and the Office of Management and Budget announced that the agency will no longer accept paper records from federal agencies as of December 31, 2022. We are concerned that with diminished resources NARA will not be prepared to make this transition without serious disruptions.

In addition, since 1985 NARA has added five presidential libraries (for Presidents Carter, Reagan,
George H.W. Bush, Clinton, and George W. Bush). NARA also is incurring the costs associated with the development of the new “virtual” presidential library for President Obama and preparing for the presidential libraries of the future.

We have the following comments on specific items in NARA’s FY 21 proposed OE budget:

Improving Veterans’ Access to Their Military Records
We strongly support the $16 million in NARA’s budget request designated to support veterans’ access to records necessary to obtain veterans’ benefits and to provide military separation documents to all veterans and their families at no cost. This initiative would also provide for the additional costs of allowing veterans to submit electronic requests for their records. NARA estimates the National Personnel Records Center would receive an additional 320,000 requests per year if digital signatures were accepted.

Digitization Initiative at Archives II
NARA is in the process of preparing for a December 31, 2022, deadline after which it will no longer accept transfers of permanent or temporary records in analog formats and will accept records only in electronic format and with appropriate metadata. The budget request allows NARA to carry over $9.2 million from the $22 million appropriated in FY 20 to accelerate the processing and release of large volumes of government information through mass digitization of paper records and at-risk special media records (audio, video, and motion picture records). We support this funding in the FY 21 request to enable NARA to outfit the renovated space with the equipment necessary to prepare and digitize records. Despite these expenditures, we remain concerned about whether NARA will be able to reach this ambitious deadline without additional funds.

Civil Rights Cold Case Initiative
NCH opposes the Administration’s decision to terminate funding for the Civil Rights Cold Case Initiative. This program received $2 million in initial funding in FY 20.

National Historical Publications and Records Commission
NHPRC is the grant-making arm of NARA. It enables the National Archives to provide leadership through grants that support exploration of major archival issues, such as preservation of electronic records, disaster preparedness, and coordination and communication among archivists nationwide. The agency also provides grants for the creation of documentary collections (books and electronic) of the papers of nationally significant individuals and institutions. As an example, NHPRC has funded an ongoing project to make the papers of the Founding Fathers available for free online.

NHPRC grants leverage state, local, institutional, foundation, and other private funding by requiring 50 percent cost sharing—that is, every federal dollar invested is matched by a dollar from another source. NHPRC grants serve as the linchpin of many projects’ funding structures; without federal dollars, even long-standing projects could be terminated.

For the fourth year in a row, the Administration has recommended eliminating the NHPRC grants program. Thankfully Congress has rejected these proposed cuts and instead provided funding of
$6.5 million—which is half of the $13 million provided in FY 10. This is barely adequate to support ongoing programs and implement critical new digital initiatives.

We urge the subcommittee to reject the Administration’s proposal to eliminate NHPRC, and instead to provide funding of $7 million for this small but important program. To provide context, the NHPRC received $10 million twenty years ago in FY 1999.

In conclusion, the National Coalition for History urges Congress to provide the National Archives and Records Administration with the additional funding it needs to serve its core mission. We ask the subcommittee to reverse these years of financial neglect for this agency that is so vital to our democracy. As Americans, we have a fundamental right to access the records of our government. This is not a luxury that can be swept aside in the name of budget austerity.

Thank you for the opportunity to submit these comments.

Sincerely,

Lee White
Executive Director
National Coalition for History