



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

August 20, 2021

BY EMAIL: strategy@nara.gov

The Hon. Carla Patterson, Director, Strategy and Performance Division
National Archives and Records Administration
8601 Adelphi Road
College Park, Maryland 20740

Re: Comment of Citizens for Responsibility and Ethics in Washington in response to Draft FY 2022-2026 Strategic Plan, National Archives and Records Administration, 86 FR 43274 (August 6, 2021)

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully submits this comment to the National Archives and Records Administration (“NARA”) on your draft Fiscal Year 2022-2026 Strategic Plan (“Strategic Plan”). CREW thanks NARA for providing the public with the opportunity to submit constructive feedback on your Strategic Plan, and we look forward to collaborating with you as you revise this important document in the days and weeks to come. We are encouraged that your Strategic Plan focuses on improving your willingness to “make access [to government records] happen,” including by strengthening your “enga[gement] with underserved communities” in order to “expand public participation and promote equity.”¹ That is an admirable goal.

In that spirit, CREW encourages NARA to commit to reexamining its records appraisal policies to better account for the interests and viewpoints of “underserved communities.” For instance, NARA has explained that its current appraisal policies do not value “inclusive perspectives” of people detained in immigration detention facilities, or records reflecting serious abuse and mistreatment of non-citizens by federal officials.² We do not believe these policies are in keeping with the Strategic Plan’s commitment to “promot[ing] equity ... in access to archival records related to underserved communities” and “increas[ing] access to records that are important to underserved communities.”

¹ Strategic Plan at 3, <https://www.archives.gov/files/about/plans-reports/strategic-plan/draft-strategic-plan-2022-2026.pdf>.

² NARA Reply to DAA-0567-2015-0013 Immigration and Customs Enforcement, Detainee Records, December 12, 2019, at 9, 5 <https://downloads.regulations.gov/NARA-19-0007-0068/content.pdf>.

NARA has an invaluable role to play in shaping a better and more inclusive government. And while your draft Strategic Plan is a step in the right direction, NARA should carefully consider whether its current records appraisal policies are consistent with the commitments set forth in the draft plan.

Thank you for the opportunity to submit feedback on your Strategic Plan. CREW looks forward to continuing to collaborate on this and many other projects as NARA institutes many of the critical reforms that you have outlined in this draft.