National Archives and Records Administration

Transmittal Memo

DATE: **JUN 2 0 2013**

TO: Executives, Staff Directors, NHPRC, and OIG

SUBJECT: NARA 860 – NARA Corporate Records Management Program

Purpose: This transmits the revised directive, NARA 860, NARA Corporate Records Management Program.

Background/significant changes: This directive updates program objectives and roles for implementing the responsibilities of records management laws and regulations. It establishes NARA's Corporate Records Management Program and forms the basis for a new policy framework to support electronic recordkeeping requirements. This directive also implements specific requirements of the OMB Memorandum M-12-18, Managing Government Records Directive.

Corporate Records Management (CM) staff will implement the new records management policy framework in a phased approach. We will develop and provide training, guidance, and the tools required by information management officers and records custodians and other stakeholders to properly and routinely carry out the disposition instructions for eligible corporate records and move NARA toward electronic recordkeeping.

Canceled policy: Files 203, NARA FILES MAINTENANCE AND RECORDS DISPOSITION MANUAL. The on-line NARA Records Control Schedule remains in effect at http://www.nara-at-work.gov/nara-policies_and_guidance/directives/0800_series/203-records-schedule/index.html

Effective date: This policy is effective on the date of signature.

National Archives and Records Administration

Contact information: Contact Susan Sullivan (CM) in room 2510, AII; on 301-837-2088 or by email.

DEBRA STEIDEL WALL

Deputy Archivist of the United States

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Attachment

SUBJECT: NARA Corporate Records Management Program

860.1 Purpose

This directive establishes the NARA Corporate Records Management Program and identifies the program objectives, roles and responsibilities of NARA officials and designated personnel, and authorities for the creation, maintenance, and disposition of NARA's records.

860.2 Authorities

- a. 44 U.S.C. Chapters 21, 29, 31, and 33
- b. 36 CFR Chapter XII, Subchapter B Records Management
- c. OMB M-12-18, Managing Government Records Directive

860.3 NARA's Recordkeeping Responsibilities

- a. Establish and maintain an active, continuing program for the economical and efficient management of our internal records.
- b. Establish effective controls over the creation, maintenance, and use of records in the conduct of current business.
- c. As a Federal agency, to apply standards, procedures, and techniques designed to improve the management of records, promote the maintenance and security of records deemed appropriate for preservation, and facilitate the segregation and destruction of records of temporary value.
- d. Implement a records maintenance program so that complete records are filed or otherwise identified and preserved, records can be readily found when needed and permanent and temporary records are physically segregated from each other or, for electronic records, segregable.
- e. Per OMB M-12-18, NARA (and all federal agencies) must:
 - (1) have a plan to manage all permanent electronic records in an electronic format, identify all unscheduled and permanent records 30 years or older;
 - (2) have records management training in place for appropriate staff;
 - (3) manage both permanent and temporary email records in an accessible electronic format; and

(4) manage all permanent electronic records in an electronic format.

860.4 Implementing Principles

NARA will maintain a comprehensive records management policy and procedures framework for ensuring that:

- a. Records documenting agency business are created or captured;
- b. Records are organized and maintained to facilitate their use and ensure integrity throughout their authorized retention periods;
- c. Records are available when needed, where needed, and in a usable format to conduct agency business;
- d. Legal and regulatory requirements, relevant standards, and agency policies are clearly identified and followed;
- e. Records, regardless of format, are protected in a safe and secure environment and removal or destruction is carried out only as authorized in records schedules;
- f. Continuity of operations is supported by a vital records program; and
- g. NARA develops and implements plans to manage records, including emails, in electronic format before December 2019. Official records will be maintained and managed in electronic format. To accomplish this, NARA will transition from hard copy recordkeeping policies and practices to maintaining and managing all of our content in electronic form.

860.5 Records Management Roles and Responsibilities

NARA records management stakeholders with records management responsibilities are collectively considered the Records and Information Management Network (RIM Network). The RIM network's goal is to bring records experts together to improve records management processes and meet legal obligations. The Corporate Records Management (CM) staff will work with individuals with recordkeeping responsibilities to ensure that they understand how to meet their recordkeeping responsibilities.

a. The Archivist of the United States (N)

The Archivist of the United States is responsible for the entire NARA Corporate Records Management Program, but delegates this responsibility to the Director of Corporate Records Management through the Chief Operating Officer (COO). The statutory basis (The Federal Records Act of 1950, as amended) is as follows:

(1) Make and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and

- essential transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities (44 USC 3101).
- (2) Establish and maintain an active, continuing program for the economical and efficient management of the records of the agency (44 USC 3102).
- (3) Per OMB M-12-18, designate a Senior Designate a Senior Agency Official (SAO) responsible for coordinating with the Agency Records Officer and appropriate agency officials to ensure the agency's compliance with records management statutes and regulations.
 - (a) The SAO is a senior official at the Assistant Secretary level or its equivalent who is directly responsible for ensuring that NARA efficiently and appropriately complies with all applicable records management statutes, regulations, and NARA government-wide policy including the requirements of OMB M-12-18, Managing Government Records Directive.
 - (b) The SAO must be located within the NARA organization so as to make adjustments to agency practices, personnel, and funding as may be necessary to ensure compliance and support the business needs of NARA.

b. The Chief Operating Officer (COO)

- (1) Serves as the Senior Agency Official (SAO) overseeing the NARA Corporate Records Management Program.
- (2) Commits monetary and other resources necessary for the successful implementation of the NARA Corporate Records Management Program.
- (3) Appoints, in writing, the NARA Records Officer (Director, Corporate Records Management) and further delegates to him or her authority within the agency to coordinate and oversee implementation of the agency comprehensive records management program principles and the NARA Corporate Records Management Program on a full-time basis.
- (4) Ensures that the NARA Records Management Program provides for effective controls over the creation, maintenance, and use of records in the conduct of current business; applying standards, procedures, and techniques designed to improve the management of records, promote the maintenance and security of records deemed appropriate for preservation, and facilitate the segregation and destruction of records of temporary value.

(5) Reports annually to OMB and NARA's Chief Records Officer (CRO) the status of NARA progress toward the goals of OMB M-12-18.

c. The Director, Corporate Records Management (CM)

The Director of Corporate Records Management is responsible for implementing the entire NARA Corporate Records Management Program under the Chief Operating Officer (COO), as delegated by the Archivist of the United States.

- (1) Establishes program objectives, responsibilities, and authorities for the creation, maintenance, and disposition of agency records.
- (2) Provides guidance and training to all staff on their records management responsibilities, including identifying Federal records, in all formats and media.
- (3) Issues appropriate instructions to all employees on handling and protecting records.
- (4) Institutes controls ensuring that all records, regardless of format or medium, are properly organized, classified or indexed, and described, and made available for use by all appropriate staff.
- (5) Coordinates and maintains vital records required to support the Continuity of Operations Program (COOP).

d. Executives and Staff Directors

- (1) Assign information management officers (IMOs), records custodians (RCs), and project records custodians (PRCs) in each functional area to ensure incorporation of recordkeeping requirements and records maintenance, storage, and disposition practices into agency programs, processes, systems, and procedures.
- (2) Collaborate with Corporate Records Management (CM) staff through their IMOs to ensure:
 - (a) All records and information in their organization is identified and records are approved for disposal or permanent preservation under the NARA schedule.
 - (b) Recordkeeping resources for their organization (e.g., file plan, file systems, shared drives, and email configurations) are established, implemented, and current.
 - (c) Records in every business function are under the purview of an IMO or RC.

e. Information Management Officers (IMOs)

IMOs are designated in each functional area throughout NARA (e.g., a functional area creates/receives operational records related to a particular NARA business function or facility such as a NARA organization, regional facility, or presidential library). IMOs ensure the proper execution of records management responsibilities for groups of records that are related to a NARA business function or facility. They collaborate with directors, managers, Corporate Records Management (CM) staff, and other records management stakeholders (e.g., General Counsel and IT Project Managers) and staff. IMOs oversee the work of records custodians (RCs) to ensure compliant recordkeeping. IMOs will use CM developed policies, tools, and other recordkeeping resources to implement recordkeeping responsibilities. Examples of implementation activities include:

- (1) Identify records and information stored in all media including electronically stored information.
- (2) Review and approve file plans within the area of responsibility and ensure they are kept current.
- (3) Track the disposition or the disposal/deletion of temporary records to determine when their retention expires.
- (4) Oversee RCs to ensure the transfer of eligible permanent or temporary records to a records center or designated electronic storage location.
- (5) Coordinate training and distribute records management guidance for staff and RCs as needed to meet recordkeeping needs.
- (6) Evaluate the effectiveness of records and information activities within the assigned functional area(s).
- (7) Conduct periodic evaluations or compliance checks (at least annually) to ensure and document the proper implementation of NARA's records and information management policies.
- (8) Coordinate use of Archives and Records Centers Information System (ARCIS) or other approved systems to transfer and retrieve records that have been retired to a Federal Records Center.
- (9) Provide information and/or data to Corporate Records Management (CM) for compliance monitoring and business performance analysis.
- (10) Advise RCs and employees on the management of records and information throughout their life cycle. Ensure recordkeeping requirements are included in NARA electronic information systems.

- (11) Support the Continuity of Operations Program (COOP) and vital records requirements.
- (12) Ensure that recordkeeping requirements are addressed in records paragraphs of NARA directives and guidance.

f. Records Custodian (RC) or Project Records Custodian (PRC)

In each NARA functional area or special project a designated RC will implement NARA's records management program within their functional area. Under the oversight and direction of the IMO, the RC executes all basic records management operations to ensure agency compliance. The RC collaborates with the assigned IMO and/or CM staff to:

- (1) Develop and maintain a records inventory and file plan for the assigned functional area(s).
- (2) Implement the disposition of NARA's records and information in all media according to policies and guidelines.
- (3) Retire eligible records to a Federal records center or designated electronic storage area including the prompt disposal/deletion of temporary records when their retention expires.
- (4) Assist in coordinating the proper and periodic training of employees within an assigned functional area.
- (5) Assist the designated IMO to conduct periodic evaluations of records and information activities within the functional area.
- (6) Collaborate with the designated IMO to retrieve and transfer records to a Federal records center utilizing approved systems (i.e., ARCIS).
- (7) Advise employees on the management of records and information throughout their project life cycle, including email, NARA records maintained by contractors, records maintained on laptops and storage devices as a result of telework activities, and records created within project wikis and shared directories devoted to projects within the functional area.

g. Executive Records Management Stakeholder Responsibilities

(1) Chief Information Officer (CIO) - serves as the agency official responsible for the information resources management program; that is, the process of managing information resources to accomplish agency missions, which encompasses both information itself and related resources

or assets, such as personnel, equipment, funds, and information technology (Clinger-Cohen Act).

- (a) Coordinates with the Director of Corporate Records Management (CM) to ensure that the design and implementation of the agency's information systems incorporate Federal and agency records management requirements.
- (b) Coordinates with the Director of CM to ensure the reliability and integrity of information created and maintained within NARA's IT infrastructure.
- (2) General Counsel serves as the official responsible for providing legal advice and assistance to agency officials and employees.
 - (a) Provides advice regarding the legal value of the agency's records and the issue of public access to them.
 - (b) Coordinates with the Director of CM on record holds and freezes, Freedom of Information Act requests, and Privacy Act enforcement.
- (3) Chief Human Capital Officer coordinates with:
 - (a) The Director of CM to include basic records management competencies in appropriate competency models.
 - (b) Appropriate subject matter experts to support the training needs of all agency personnel on their records management responsibilities, including identification of Federal records, in all formats and media.
 - (c) The Director of CM and the Chief Records Officer in training IMOs and RCs on specific recordkeeping responsibilities.
- (4) Chief Strategy and Communications Officer coordinates with the Director of CM to incorporate NARA Records Management goals within NARA's plans and strategies.
- (5) Inspector General serves as the official responsible for monitoring agency programs and operations to prevent and reduce waste and fraud, and to improve agency management. Coordinates with the Director of CM and others regarding any recordkeeping deficiencies identified during inspections and investigations.
- (6) Chief Records Officer collaborates with management and staff within CM to ensure connectivity between innovative projects, advocacy for best

practices, and outreach to Federal agencies to ensure alignment with the NARA's guidance to Federal agencies.

h. Role-based Records Management Stakeholder Responsibilities

Staff with responsibilities for managing NARA systems and/or processes that create, maintain or use NARA records must ensure that those records are managed properly. Proper recordkeeping improves the effectiveness and efficiency of these systems and processes. CM staff works with these individuals either directly or indirectly through IMOs, to ensure that recordkeeping requirements are properly implemented and to identify improvement opportunities.

- (1) IT Product Owners and/or Project Managers primarily responsible for managing electronic information system(s).
 - (a) Through processes such as, Capital Planning and Investment Control, Systems Development Lifecycle, and Enterprise Architecture Planning; work with CM and the appropriate IMOs, RCs and others to ensure that the design and implementation of the system adheres to Federal and agency records management requirements.
 - (b) Implement records management and archival requirements into the development and implementation of electronic information systems while ensuring access to electronic records minimizes the risk of unauthorized additions, deletions, or alterations.
- (2) Web Product Managers/ Content Managers primarily responsible for managing the web pages and social media within a functional area, e.g., assuring compliance with agency and local directives. Ensure that the web page managers understand and adhere to recordkeeping requirements.
- (3) Program Managers (Supervisors) coordinate with executives, directors, CM staff, and designated IMOs and RCs to allocate recordkeeping resources necessary to maintain compliance.
- (4) Continuity of Operations (COOP) Program Planners work with IMOs and RCs to protect vital records and systematically review and test the plan and ensure vital records are accessible at designated COOP sites.
- (5) Director of Applied Research within Information Services coordinates with the Director of CM to foster records management innovation and leverage new theories, knowledge, methods and techniques to advance the lifecycle of NARA's electronic records. This includes identifying, exploring, and evaluating new developments in computer science and related fields that are likely to impact the lifecycle management of records.

i. Supervisors and all NARA personnel (employees, contractors, volunteers, and interns)

- (1) Obtain basic records management training and guidance from the office's IMO and/or RC(s), and/or CM.
- (2) Recognize that the office's records are Federal property and consist of recorded information (documentary materials) required by law or used to conduct agency business.
- (3) Create and maintain records documenting office activities.
- (4) Cooperate with the IMO and/or RC(s) to ensure that all records are listed in the office file plan and described accurately in the agency's records schedule.
- (5) Do not mix personal papers and non-record materials with Federal records.
- (6) Cooperate with the IMO and/or RC(s) in transferring eligible records to a records center and permanent records to NARA.
- (7) Cooperate with the IMO and/or RC(s) in destroying records only as authorized in the agency's records schedule.
- (8) Avoid removing records from the office without proper authorization.

860.6 Maintaining Records Generated by this Policy

- a. Records created by CM
 - (1) Records documenting the planning, managing and evaluating of the program; maintain records under File No. 241-1a.
 - (2) Records documenting the development of records management policy: maintain records under File No. 241-1b.
 - (3) Records created in the course of program implementation maintain records under File No. 241-3a, b, or c as appropriate.
- b. Records created by the Office of the Archivist and the Chief Operating Officer (COO) maintain records under File No. 108.
- c. Records created by executive records management stakeholders related to NARA's own records management policy development and agency-wide implementation: maintain records under File No. 109 as appropriate.

- d. Records created by role-based records management stakeholders, supervisors, IMOs and RCs:
 - (1) Regional records facilities with the exception of the National Personnel Records Center (NPRC) maintain records under File No. 266.
 - (2) All other organizations maintain records under File No. 205.