

National Archives and Records Administration

Transmittal Memo

DATE: February 22, 2023

TO: All Staff Executives, Staff Directors, NHPRC, and OIG

SUBJECT: NARA 860 - Management of NARA's Corporate Records

Purpose: This memorandum transmits an update to NARA 860, Management of NARA's Corporate Records, which provides responsibilities and requirements to ensure the efficient and thorough management of corporate/operational records.

Background/significant changes:

- Shifts focus from initial establishment of the Corporate Records Management program to continuous management of corporate records throughout the entire records life cycle.
- Adds the designated role of a Corporate Records Management Liaison in each program office to oversee the records activities of existing Information Management Officers (IMOs) and Records Custodians (RCs).
- Clarifies who designates Corporate Records Management Liaisons, Information Management Officers, and Records Custodians.
- Outlines specific roles and responsibilities such as those of the Senior Agency Official for Records Management, Agency Records Officer, Information Management Officers, managers and supervisors, and system owners, and NARA staff.
- Adds definitions of "records," "non-record materials," and "personal files."
- Cites additional "Authorities," including OMB M-19-21, "Transition to Electronic Records Directive" (superseding OMB M-12-18, the "Managing Government Records Directive") and any other subsequent White House memoranda relating to same. The supplement to this policy entitled, Procedures for Managing Permanent Electronic Records to be maintained in ZL Unified Archive, dated December 30, 2019, remains the same.

Available forms: None.

Canceled forms: None.

Canceled policy: None

Related policies: Interim Guidance 861-1, Managing Electronic Messages, dated December 30, 2019; NARA 825, Holds for Operational Records, dated September 22, 2020.

National Archives and Records Administration

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

Contact information: For questions on how to use this policy, please contact Deborah Armentrout, Corporate Records Management Program (CM), on (301) 837-3563, or at deborah.armentrout@nara.gov.

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Deputy Archivist of the United States
Attachment

National Archives and Records Administration

NARA 860
February 22, 2023

SUBJECT: NARA 860 - Management of NARA's Corporate Records

860.1 Policy.

NARA must economically and efficiently manage its own internal federal records (referred to as corporate or operational records) and related information assets as follows:

- a. Make and preserve adequate and proper documentation of its organization, functions, policies, decisions, procedures, and essential transactions;
- b. Ensure that the records furnish the information necessary to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities;
- c. Integrate records management into its business systems and processes;
- d. Create, capture, and maintain authentic, reliable, and usable records for the length of their authorized retention period, and ensure that these records are either eventually destroyed (if temporary records) or accessioned into the National Archives of the United States (if permanent records);
- e. Continually evaluate the management of its information and records to ensure its effectiveness and identify opportunities for improvement; and
- f. Comply with relevant statutes and regulations.

860.2 Scope and Applicability.

- a. The use of the term "record(s)" throughout this directive refers to corporate or operational records.
- b. This policy applies to the management of records, non-record materials, and personal files as defined:
 - i. Records, as defined in [44 U.S.C 3301\(a\)](#), 'includes all recorded information, , regardless of physical form or characteristics, made or received by an agency of the United States Government under federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations or other activities of the Government or because of the informational value of the data in them.' Examples include: books, papers, maps, photographs, machine readable materials, or other documentary materials.
 - ii. Non-record materials. Those federally owned informational materials that do not meet the statutory definition of records (44 U.S.C. 3301(a)) or that have been excluded from coverage by the definition. Excluded materials are extra copies of documents kept only for reference, stocks of publications and processed documents, and library or museum materials intended solely for reference or exhibit.

- iii. Personal files. Documentary materials belonging to an individual that are not used to conduct agency business. Personal files are excluded from the definition of federal records and are not owned by the Government.
- c. This policy applies to the entire life cycle of records, irrespective of format (e.g., paper, digital, audio, photographic, micrographic, cartographic, geospatial); that is, creation or receipt, maintenance, disposal (destruction), retirement, and accessioning of permanent records to the National Archives.
- d. Records life cycle activities only occur based on an approved records schedule. Records schedules approved by NARA provide mandatory instructions for the disposition of the records (including the accession of permanent records and disposal of temporary records) when they are no longer needed by the agency. All federal records must be scheduled either by an agency schedule or a General Records Schedule.
- e. This policy does not apply to other federal agency records for which NARA has physical or legal custody such as those stored at federal records centers or transferred into NARA holdings.

860.3 Responsibilities.

In addition to the authorities delegated in NARA 101, NARA Organization and Delegation of Authority, the following responsibilities are assigned in order to effectively implement these policies.

- a. **The Archivist of the United States (N)** designates a Senior Agency Official for Records Management who has direct responsibility for ensuring that the agency efficiently and appropriately complies with all applicable records management statutes, regulations, and policies, including the requirements in this directive. This authority is retained by the Archivist and may not be redelegated.
- b. **Senior Agency Official for Records Management (SAORM)**
 - i. Issues agency directives, policies, and initiatives supporting OMB and NARA goals and subsequent guidance and memoranda for transitioning towards a fully electronic government.
 - ii. Ensures NARA efficiently and appropriately complies with all applicable records management statutes, regulations, and policies including the protection of records against unauthorized removal or loss.
 - iii. Provides adequate budgetary and personnel resources to implement an efficient and effective agency records management program.
 - iv. Ensures agency staff are informed of and receive training on their records management responsibilities as defined in NARA regulations and guidance.
 - v. Submits reports to the Office of the Chief Records Officer, on behalf of NARA, and supports records management inspections, assessments, and other oversight activities regarding internal operational records.
 - vi. Appoints the NARA Agency Records Officer (ARO) and further delegates to the ARO authority to manage and oversee implementation of the NARA records management program on a full-time basis.

- vii. Oversees Corporate Records Management (CM) program and provides strategic direction for it.

c. Agency Records Officer (ARO)

- i. Develops policies, procedures, and guidance for the management of NARA corporate records, regardless of their format, from creation to final disposition.
- ii. Ensures NARA corporate records are properly scheduled for retention and disposition and conducts a review, every five years, of all NARA records schedules that are ten years old and older, based on the date the schedule was originally approved.
- iii. Issues and disseminates disposition authorities within six months of approval of approved agency schedules and additions and changes to the General Records Schedules (GRS) to ensure proper distribution and application of the schedule.
- iv. Oversees the implementation of records schedules through the appropriate destruction/deletion of temporary corporate records and the accession of eligible permanent corporate records to the National Archives. Reports any improper removal, alteration or destruction of records to the Office of the Chief Records Officer and the Office of Inspector General.
- v. Issues and removes holds on NARA corporate records and other related documentary materials when related to Office of Inspector General or Government Accountability Office (GAO) activities or when otherwise requested by Executives, Staff Directors, or the Office of General Counsel.
- vi. Institutes controls ensuring that all corporate records are properly organized, classified, described, handled, and made available for use by all appropriate staff.
- vii. Manages annual updates to the essential records inventory as required to support continuity of operations during an emergency.
- viii. Administers access to NARA systems for managing, retiring, and accessioning corporate records.
- ix. Plans, directs, and conducts comprehensive and long-range projects or studies of records and information management practices and evaluates recordkeeping practices to determine the effectiveness of the program.
- x. Promotes awareness and understanding, via training and outreach, of records management to senior officials, management, staff, and contractors so that they are aware of their records management responsibilities and requirements, including during the onboarding and offboarding process.
- xi. Ensures that the design and implementation of all NARA electronic systems meets records management requirements as applicable, in coordination with the Chief Information Officer.
- xii. Advises the network of Corporate Records Management Liaisons (CRMLs) and Information Management Officers (IMOs) on how to carry out their records management responsibilities.

d. Executives and Staff Directors

- i. Ensure recordkeeping tools and resources for their organization (e.g., records inventory and maintenance plans, file/record systems, shared drives) are established, implemented, and updated.

- ii. Ensure the incorporation and implementation of recordkeeping requirements into their organization's policies, procedures, processes, and systems and evaluate their program's compliance on a periodic basis.
- iii. Appoint a Corporate Records Management Liaison (CRML) who will be the office's central point of contact (POC) with the ARO/CM and notify the ARO when there is a change in a designated CRML.
- iv. Appoint Information Management Officers (IMOs), as appropriate.
- e. **Corporate Records Management Liaisons (CRMLs)**
 - i. Coordinate corporate records management activities for their program office at the Executive or Staff Director organizational level. The CRML will oversee records management activities of IMOs and RCs within their office. In some cases, CRMLs may also serve as the IMO for their office.
 - ii. Serve as the liaison/POC between their program office and the ARO/CM.
 - iii. Oversee the incorporation and implementation of recordkeeping requirements into their organization's policies, procedures, processes.
 - iv. Advocate on behalf of organizational stakeholders to ensure that they have adequate tools and resources (guidance, funds, systems, etc.) to fulfill their records management responsibilities.
 - v. Ensure their program offices complete records management tasks such as validating office records inventory and maintenance plans within their area of responsibility and submitting to the ARO.
 - vi. Work with the ARO to ensure that all of their unscheduled records are covered by an approved records disposition authority.
- f. **Information Management Officers (IMOs)**
 - i. Implement recordkeeping in their organizational units using CM policies, procedures, guidance, and records management tools, working through their CRML.
 - ii. Advise staff within organizational unit on the management of corporate records and information throughout the records life cycle and distribute records management guidance to staff to meet recordkeeping needs.
 - iii. Participate in the incorporation and implementation of recordkeeping requirements into organization's policies, procedures, processes, and systems including records management in directives, digitization of corporate records, and in systems development.
 - iv. Implement records schedules to include the appropriate destruction/deletion of temporary corporate records and the accession of eligible permanent corporate records to the National Archives, through CM.
 - v. Maintain a records inventory and maintenance plan for all corporate records in their organizational unit.
 - vi. Conduct periodic evaluations or compliance checks to ensure the proper implementation of records and information management policies within the assigned program area.
 - vii. Provide information and/or data to CM via the CRML for compliance monitoring and business performance analysis as requested.

- viii. Delegate records management activities to individuals at lower levels of the organization when necessary (e.g., Records Custodians).
- g. Records Custodians (RCs)** perform records management tasks within their organizational unit as coordinated by CRMLs and/or the IMOs.
- h. Chief Information Officer (CIO)**
 - i. Ensures that the design and implementation of the agency's information systems incorporate federal and agency records management requirements, in coordination with the ARO.
 - ii. Attests to the reliability and integrity of the information and records created and maintained within NARA's IT infrastructure.
- i. Information System Owners**
 - i. Identify records management as a documented requirement when developing or acquiring a system or automated tool that will create or maintain NARA corporate records.
 - ii. Coordinate system records management capabilities and records retention and disposition with CRMLs, IMOs, and Information Services.
 - iii. Implement disposition of electronic corporate records in accordance with the requirements of NARA records schedules.
- j. Managers and supervisors**
 - i. Ensure the incorporation and implementation of recordkeeping requirements into their organization's policies, procedures, processes, and systems, in coordination with their office CRML and IMO.
 - ii. Provide the resources to implement corporate records management requirements. When necessary, work with the office CRML to designate an IMO and/or RC for their unit.
 - iii. Report the inadvertent or deliberate removal, alteration or destruction of corporate records to CM when the records cannot be easily recovered or reconstructed, or when deliberate action is suspected.
 - iv. Arrange for corporate records in the custody of departing staff members to remain accessible and secure all personnel-related records of managers and supervisors so that they remain accessible as appropriate.
 - v. Ensure that all staff, contractors, and volunteers complete annual records management refresher training.
- k. NARA Staff (i.e., employees, students, interns, volunteers, detailees, contractors, and Foundation personnel)**
 - i. Know which records have been identified as necessary to document their organizations' business activities and ensure that they create and adequately maintain them.
 - ii. Determine the difference between record, non-record, and personal information and treat them accordingly in their organizations.
 - iii. Report the inadvertent or deliberate removal, alteration, or destruction of records to their supervisors, or appropriate chain of command, such as a Contracting Officer's Representative who in turn reports the incident to CM.

- iv. Ensure that any records in their custody remain accessible in the event of their departure from the organization or agency.
- v. Understand how NARA manages electronic messages, including electronic mail, chats, texts, and voice mail.
- vi. Follow procedures for obtaining supervisory authorization when removing records and non-records from agency custody.

860.4 Training.

- a. CRMLs and IMOs complete training within 30 days of appointment and complete the IMO annual refresher training.
- b. NARA employees, students, interns, volunteers, detailees, contractors, and Foundation personnel complete annual records management refresher training.

860.5 Procedures.

CM's website on NARA@Work includes detailed guidance, procedures, and additional resources for implementing this directive such as, the supplements to this policy, and Records and Information Management Guidelines (RIM-G's).

860.6 Authorities.

[44 U.S.C. Chapter 31, "Records Management by Federal Agencies,"](#) requires that, among other duties, the head of each Federal agency shall make and preserve records, and establish and maintain a program for the "economical and efficient management" of the agency's records.

[36 CFR Chapter XII, Subchapter B – Records Management \(Parts 1220 and 1222 through 1239\)](#) stipulates policies for Federal agencies' records management programs relating to proper records creation and maintenance, adequate documentation, and records disposition. This subchapter implements provisions of 44 U.S.C. Chapters 21, 29, 31, and 33.

[OMB Circular A-130, "Managing Information as a Strategic Resource" \[5d\(5\)\(d\)\],](#) states that "records management functions and retention and disposition requirements must be fully incorporated into information life cycle processes and stages, including the design, development, implementation, and decommissioning of information systems."

[OMB M-19-21,](#) or the most recent [White House Memorandum on Transition of Electronic Records Directive,](#) "directs Federal agencies to transition recordkeeping to a fully electronic environment" in compliance with records management laws and regulations.

860.7 Public Release.

Unlimited. This directive is approved for public release.

860.8 Records Management.

Operational records created and maintained in the conduct of NARA business are covered by the appropriate dispositions provided for in the NARA Records Schedule or General Records Schedule.