

Recordkeeping in Transformation – Top 10 FAQs

Introduction

Corporate Records Management developed this FAQ to answer NARA staff's questions about individual recordkeeping requirements during the Transformation. It is meant as a quick reference guide to help NARA staff identify, store, manage, and protect records created in their jobs so that valuable NARA records are not lost during the Transformation. More information on this topic is available in the following NARA publication: [Documenting Your Public Service](#).

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1. What are my corporate records management responsibilities?

As a NARA employee, you are responsible for:

- a) Creating and capturing records that provide complete and accurate documentation of your NARA's business activities.
- b) Organizing and maintaining your work-related records to ensure that they are readily available when needed, where needed, and in a usable format throughout their life (i.e., authorized retention periods).
- c) Storing and protecting the integrity of your work-related records, regardless of format, in a safe and secure environment. This includes making sure that:
 - Unauthorized people cannot remove or alter your records,
 - They are protected from loss, damage, and unauthorized disclosure
 - Destruction is carried out only as authorized in the NARA Records Control Schedule (RCS).

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2. Storage is cheap, so why not keep everything?

All stored information is subject to search and production for Freedom of Information Act (FOIA) requests and [litigation discovery](#), even if not a record. Storage requires storage space and other costly resources to maintain information. Large volumes of data and hardcopy are difficult, time consuming and expensive to search, even with powerful search tools. So it's a good idea to dispose of records when they are eligible (according to records schedules) and to keep only those non-records that you really need for reference and background. Stay lean, green and compliant.

3. How do I identify the official NARA records that I should preserve?

Identify official information that you create, use and maintain as part of your job, and the information that you must preserve as official records. ***If you determine that it is a recordkeeping copy and it provides documentation of your NARA business activities, you likely have record material that you are responsible for preserving.***

Is it a recordkeeping copy?

- a) Did you create, receive and/or maintain the information as part of your job, and is it the “one-of-a-kind” or the only readily available copy of information created in the course of your duties? One-of-a-kind in today’s electronic world often means it’s a print-out with handwritten notes, handwritten material, or a hard copy with no corresponding electronic source file(s).
e.g., correspondence, agreements, studies, completed and/or signed forms
- b) Does the information provide the unique, authentic, and / or best known complete and accurate evidence of activities and actions performed by you or a group you work in, as part of your business function or a special project?
e.g., calendars, meeting minutes, project reports, guidance products, business process analysis.

If you are not 100% sure that it is a recordkeeping copy, play it safe and preserve it until you identify the actual recordkeeping copy.

Does it provide documentation of your NARA business activities?

If it is a recordkeeping copy AND you answer yes to any of the questions below, you likely have record material that you are responsible for preserving.

- a) Does the content support your immediate organization’s financial obligations or legal claims, and is your immediate organization responsible for responding to requests for this information?
e.g., grants, contracts, litigation case files, Government purchase card documentation

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- b) Does a statute or regulation require you or your immediate organization to create, maintain and submit the official record of this information to other offices, agencies, or organizations as part of your job?
e.g., CPIC documentation, contract information, completed Standard Forms
- c) Did you create or maintain this information for background or a similar purpose, and does it contain information that explains formulation of significant program policies and decisions? *e.g., drafts, review comments, e-mail discussions, preliminary drafts of directives.*
- d) Do you create, maintain, and/or submit the information as instructed by a NARA directive, standard operating procedure or by your manager?
e.g., completed forms, correspondence, agreements, plans, case files, reports
- e) Do you receive the information for you to take specific action? Do you also create and/or maintain documentation of your responses for future business reference? (This is called a case file or correspondence package.)
e.g., FOIA requests, controlled correspondence, Action Notice
- f) Do you create and maintain this information to communicate NARA requirements to others? *e.g., guidance documents, policies, procedures*
- g) Do you create and maintain this information to document the design, development, implementation or operation of an electronic information system used to conduct NARA business? *e.g.) Systems Development Lifecycle (SDLC) documents, backup logs, user account request forms, security plans,*

If you determine that it is a recordkeeping copy and it provides documentation of your NARA business activities, you likely have record material that you are responsible for preserving.

4. How do I secure and protect records I've identified for preservation?

- a) You should protect all hard copy documentation you've identified as records by filing them in labeled folders stored inside a locked (as practical) file cabinet. For born digital records, print them out and file them. After they've been printed and filed, you can delete them.
- b) When it is not practical to "print and file", you should secure electronic records in FileSurf (as available) or, store them, on a NARAnet storage location that is both password protected / and backed-up. Here are a few suggestions for temporarily storing electronic records outside of corporate records repository:
 - For electronic office files, copy them to a clearly identified folder (e.g., "Official Records") on your H: drive.
 - If in email, save records in a folder labeled "Official Records" in your GroupWise email archive. Check your GroupWise

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Options/Environment/File Location settings to ensure that your email archive is stored on a network drive and not your C: drive.

- You should not maintain official recordkeeping copies of electronic records on shared drives or on social media (e.g., wikis) where others can delete or change them, or on local drives that are not backed up.
 - You should not maintain email that you've identified as records in GroupWise folders that are subject to auto deletion. Your email archive is protected from auto deletion.
- c) Create a list of the records you have identified and protected. Share this list with your supervisor and co-workers so that they can gain access to this information in the event of your absence. Also, ensure that keys to locked storage are available.

5. What other information must I protect?

You must identify and protect information subject to litigation holds, FOIA requests, or that contains Personally Identifiable Information (PII) or other sensitive information.

- a) **Litigation hold content** – Protect responsive information (i.e., record and non-record) that you are holding according to NARA Legal hold Notices issued pursuant to [Interim Guidance 825-1, Holds for Operational Records and Other Related Documentary Materials](#), but note: the only agency-wide holds in effect when this FAQ was written relate to Tribal Trust activities (see the [Tribal Trust web page](#) for more information) and [Exit Clearance Records](#) NA Form 3009a. NGC may also contact you directly in a specific case to preserve records.
- b) **FOIA hold content** - Unless you have been contacted, directly or indirectly through your supervision (e.g., Office Head) by NARA's FOIA Officer in NGC or other NGC staff regarding a specific FOIA request, you likely do not have custody of responsive documentation.
- c) **Privacy content** – You must protect materials (i.e., record and non-record) that contain [personally identifiable information](#) (PII), such as: social security numbers, dates of birth, medical information, financial account or credit card numbers. Use records management as a tool to help manage and control PII. Identify document types that contain PII, maintain them within a file plan or recordkeeping system, and destroy them as soon as they are eligible according to the RCS. You must store hard copy materials containing PII under lock and key, and electronic materials should be encrypted and maintained in a password protected environment. Not on shared drives or removable media.

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6. What categories of information require “special handling?”

You must protect all information/documentation that is marked or known to be Controlled [Unclassified Information](#) (CUI) or is otherwise restricted from public access, e.g., business confidential information, pre-decisional. Consult [NARA 202](#), [NARA Classified Information Security Program](#) for details on how to manage classified national security information.

7. How long must I protect and preserve my work-related records?

After you secure your records, take the following steps to determine how long you must keep them.

- a) Determine if the retention requirements are addressed in NARA Policies.
 - **Do [NARA Policies and Guidance](#) tell me what to do with the records?** Search NARA Directives for key words to identify any recordkeeping requirements. Records Management requirements are typically included in [Records Paragraphs](#).
 - **Is it scheduled in NARA’s Records Control Schedule (RCS)?** Search the [RCS](#) for key words and identify any schedules that could apply.
 - **Are the records covered by the General Records Schedules (GRS)?** If the records you have identified are administrative rather than programmatic, [search the GRS](#) to identify any schedules that could apply.¹ Many of NARA’s records that are covered by the GRS are already included in the RCS; however yours could be the exception.
 - **Are the records transitory?** Transitory records are records of short-term interest (180 calendar days or less) “... which have minimal or no documentary or evidential value” (i.e., [GRS 23, item 7](#)). For example, you may store transitory e-mail messages or calendar items in GroupWise for up to 180 calendar days or delete them sooner, if no longer needed.
 - **Are the records unscheduled?** If none of the above applies, consider the material as unscheduled, and start drafting the information required in a [SF-115](#) to begin the records scheduling process. ***Unscheduled records must not be destroyed.***
- b) If you determine that your records are / or might be permanent, notify your supervisor and contact [Corporate Records Management \(CM\)](#) to get more information about how to preserve permanent records.

¹ The GRS are schedules issued by the Archivist of the United States that authorize, after specified periods of time, the destruction of temporary records that are common to several or all agencies.

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8. When may I destroy my work-related records?

If you have identified an applicable File Number in the RCS or GRS and determined that your work-related records are eligible for destruction (i.e., have been kept as long as the schedule dictates), take the following steps:

- a) Clear the destruction with your supervisor prior to destroying them. Verify that:
 - The records are not required for business beyond their disposition date.
 - The records are NOT the subject of a FOIA request or litigation discovery. In such cases all relevant dispositions are suspended; the records may not be destroyed until you are notified that the request or litigation is resolved.
- b) Draft a memo-to-file documenting the destruction, including a brief description of the records, inclusive dates, and the File No. you used as disposal authority.

9. What should I do with everything else?

Segregate non-records from record material so that you know what you have, and as required by [regulations](#).

- a) **Extra copies, convenience copies** - You may keep or destroy confirmed extra copies, convenience copies and other documentary materials that were kept in your office for reference or convenience.

However, if you maintain them in your work area or on electronic storage, you must maintain them separately from official records. Remember that these non-record copies are still subject to FOIA or litigation discovery; therefore, you need to know what you have and be able to produce it in response to a request.

- b) **Personal information** - Personal information can include:
 - Family and personal correspondence and materials documenting civic or other activities
 - Materials documenting professional activities when you are not representing NARA
 - Involvement with religious or fraternal organizations and outside business or political pursuits
 - Employee copies of personnel actions and other human resources-related documentation (e.g., copies of performance appraisals, copies of time sheets, pay stubs, Employee Express printouts)

It is best to discard all unneeded materials EXCEPT for those non-records and records that are already under [Freedom of Information Act \(FOIA\)](#) requests and [legal records holds](#).

10. Whom should I contact with questions?

If you have questions about managing your personal records, please contact Corporate Records Management at 301-837-0880 or RecordsMatter@nara.gov.