Knowledge Area 2:

CREATING AND MAINTAINING AGENCY BUSINESS INFORMATION

Welcome
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Administrative Items

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Administrative Items

- Emergency procedures
- Emergency exits
- Restrooms
- Break facilities
- Lunch facilities
- Cancellation policy
- Course attendance policy
- Please turn off mobile devices

*Mobile devices include, but are not limited to, portable computers, laptops or notebooks, netbooks, tablet computers, electronic readers, PDAs, smartphones, BlackBerrys and MP3 players.

NOTES
Cancellation and Attendance Policies

NARA reserves the right to postpone or cancel a course at any time. We will make every effort to contact registrants by email and telephone if that occurs. Courses WILL BE CANCELLED if the Office of Personnel Management (OPM) announces a “closed,” “unscheduled leave,” “liberal leave,” or “delay arrival” policy for Federal employees for that day or if there has been an elevation to threat level RED in the Homeland Security status. Official government closure and leave policy is located on the OPM website at http://www.opm.gov.

Attendance Policy for NARA Courses – Course completion requires that you attend all course sessions. Instructors may deny a course completion certificate for unexcused absences which may require retaking the course for additional fees.

NOTES

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Getting to Know You

Slide Welcome-3

Getting to Know You: People Bingo

- Starting with the people at your table and moving out to participants throughout the room, introduce yourselves and find people who match the categories on the worksheet. Add the person’s first name to the square or have him/her initial the square.

- When we return to the larger group, please introduce yourself (name, organization, city) and share one fact you learned about one of your classmates.

- Starting with the people at your table and moving out to participants throughout the room, introduce yourselves and find people who match the categories on the worksheet. Add the person’s first name to the square or have him/her initial the square.

- When we return to the larger group, please introduce yourself (name, organization, city) and share one fact you learned about one of your classmates.
# People Bingo

<table>
<thead>
<tr>
<th>Has used a typewriter</th>
<th>Loves coffee</th>
<th>Has at least one cat</th>
<th>Plays the piano</th>
<th>Serves (or served) in the military</th>
</tr>
</thead>
<tbody>
<tr>
<td>Has at least one dog</td>
<td>Drives a hybrid vehicle</td>
<td>Enjoys reading</td>
<td>Is a morning person</td>
<td>Has met a celebrity</td>
</tr>
<tr>
<td>Is a night owl</td>
<td>Played (or plays) in a band</td>
<td>Is new to records management</td>
<td>Has a pet other than a cat or dog</td>
<td>Loves Pinterest</td>
</tr>
<tr>
<td>Has worked in records management for more than 5 years</td>
<td>Made the longest journey to get here</td>
<td>Likes very spicy food</td>
<td>Likes snow</td>
<td>Volunteers in his/her spare time</td>
</tr>
<tr>
<td>Has lived abroad</td>
<td>Loves to go hiking or running</td>
<td>Is left handed</td>
<td>Has grandchildren</td>
<td>Enjoys gardening</td>
</tr>
</tbody>
</table>
Your Records Management Experience

How much records management experience do you have?
- Less than one year
- 1–4 years
- 5 or more years

How much time do you spend on records management tasks every month?
- 80%–100% of my time
- 50%–79% of my time
- 25%–49% of my time
- 10%–24% of my time
- Less than 10% of my time
About NARA

As you know, NARA stands for the National Archives and Records Administration. We are the archivists and records management experts who provide guidance for managing Federal records and other business information.

More formally, NARA holds a public trust that enables officials and agencies to review their actions and helps citizens hold them accountable. NARA ensures continuing access to essential evidence that documents:

- The rights of American citizens
- The actions of Federal officials
- The national experience
In this course, we will look at a variety of recordkeeping requirements, policies, and guidance that impacts how Federal agencies manage their records and recordkeeping systems.

The NARA programs relevant to this course include:

- The Records Management Policy Team within the Office of the Chief Records Officer. This team issues records management guidance to agencies.
- The Information Security Oversight Office (ISOO), which oversees the Federal government’s security classification program.
- The Office of Government Information Services (OGIS), which serves as the Federal Freedom of Information Act (FOIA) Ombudsman.
- The Office of the Federal Register, which publishes the daily Federal Register, the Code of Federal Regulations, the U.S. Government Manual, the U.S. Statutes at Large, and other publications that document the actions of the executive branch and Congress.

You can learn more about all of NARA’s programs on our website at [http://www.archives.gov](http://www.archives.gov).
Course Outline

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With the constant changes in information technology and Federal recordkeeping, NARA is pursuing ways to ensure that records professionals have the knowledge and skills to do their jobs effectively. NARA offers a program that certifies individuals after successful completion of training in Federal records management. Knowledge Area 2: Creating and Maintaining Agency Business Information is one of the five Knowledge Areas (KA 2 to KA 6) of the Federal records management training certificate program.

After completing this course, you may elect to take an examination on the course material to demonstrate both understanding and the ability to apply the information presented. The test is conducted online via NARA’s Learning Center at http://nara.csod.com.

For more information about the records management courses offered by NARA, see http://www.archives.gov/records-mgmt/training/.

NOTES
Course Objectives

At the completion of this course, you will be able to:

- Identify Federal records and how they are used to document and support the business process
- Determine the recordkeeping requirements that ensure adequate and proper documentation of agency business operations
- Identify the information to gather about records as a basis for efficient filing and storage solutions
- Identify the strategies and challenges for maintaining records, including those created by email, word processing, and imaging systems
Course Agenda

Day 1

• Welcome
• Course Outline
• Module 1: Creating and Identifying Federal Records
• Module 2: The 3 R’s: Requirements, Roles, and Responsibilities
• Module 3: Records Inventory
• Day 1 Wrap-Up

NOTES
Day 2

- Day 2 Welcome Back
- Module 4: Information Maintenance and Organization
- Module 5: Maintenance for Electronic, Social Media, and Special Media Records
- Course Wrap-Up

NOTES

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Course Materials

- KA 2: Creating and Maintaining Agency Business Information Participant Guide (PG)
  - KA 2 Modules 1 through 5
  - KA 2 Handouts
  - KA 2 References
Applying What You Learned

Slide Welcome-13

Course Outline

Applying What You Learned

NOTES
Action Items Worksheets

Training is useful only if you can apply it to your everyday responsibilities. It is important that you use the information and concepts you learn in this course to create a plan of action for when you return to your office.

To facilitate development of your plan, you will be given a few minutes at the end of each module to complete an Action Items Worksheet so you can reflect upon what you have learned in the module and how you will apply it to your job. The worksheets will also give you a venue for recording any “aha!” moments you may have had during the module, including moments you so often forget upon leaving the training environment and returning to your office.

During this time, you will also be given the opportunity to share voluntarily items from your Action Items Worksheet with the rest of the class.
Why Are We Here?

Slide Welcome-15

Course Outline

Why Are We Here?
In KA 2, our focus is to answer the question “How do I best create and maintain records?”

This course will provide you with a framework for understanding what information you need to maintain a Federal record; what requirements are associated with the information; where information resides within your agency; and what is the best way to maintain your information, from using traditional filing methods to implementing electronic document or records management applications.
Review Activity: Records Familiarity

Slide Welcome-17

Review Activity

Records Familiarity
# Records Familiarity Worksheet

Put a check next to each term that you know, understand, and could discuss with the class.

<table>
<thead>
<tr>
<th>TERM</th>
<th>CHECK</th>
<th>NOTES</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Record series</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Recordkeeping requirements</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Cutoff</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. General Records Schedules</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Records schedule (disposition, authority, disposition manual)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Administrative records</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TERM</strong></td>
<td><strong>CHECK</strong></td>
<td><strong>NOTES</strong></td>
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<tr>
<td>----------</td>
<td>-----------</td>
<td>-----------</td>
</tr>
<tr>
<td>7. Program records</td>
<td></td>
<td></td>
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<tr>
<td>8. Electronic records</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Retention period</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. Active records</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. Inactive records</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. Permanent record</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13. Temporary record</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14. Unscheduled records</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15. Information system</td>
<td></td>
<td></td>
</tr>
<tr>
<td>16. Records Management Application (RMA)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Term</strong></td>
<td><strong>Check</strong></td>
<td><strong>Notes</strong></td>
</tr>
<tr>
<td>----------</td>
<td>-----------</td>
<td>-----------</td>
</tr>
<tr>
<td>17. Essential records (vital records)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18. Lifecycle</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19. Record retentions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20. Disposition</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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Module 1: Creating and Identifying Federal Records
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## Introduction and Objectives

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  - Key Terms, Phrases, and Concepts in the Definition
- Media Formats of Records
- Record Categories
- Temporary vs. Permanent
- Record Values

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- Is Everything a Record?
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- Nonrecord Materials
  - Guidelines for Managing Nonrecord Materials
- Personal Papers
- Managing Information: Records, Nonrecord Materials, and Personal Papers
- Problem Areas
  - Working Files
  - Voicemail
  - Email
  - Email Guidance – A New Approach
  - Instant Messaging
  - Text Messaging
  - Cloud Computing
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- Activity: Tough Calls
  - Tough Calls Worksheet

Lesson Summary

Module 1 Review and Wrap-Up
- Module Review
- Applying What You Learned
- Module 1 – Action Items Worksheet

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Introduction and Objectives

Overview

In Module 1, we introduce the concept of records management, and lay the foundation for understanding the definition of a Federal record and determine the significant differences among records, nonrecord materials, and personal papers.
Module 1 Learning Objectives

At the conclusion of this module, you will be able to:

• Define Federal records and review and apply Federal records terms
• Identify categories of records
• Determine the significant differences among records, nonrecord materials, and personal papers

At the conclusion of this module, you will be able to:

• Define Federal records and review and apply Federal records terms
• Identify categories of records
• Determine the significant differences among records, nonrecord materials, and personal papers
Lesson 1: What Are Federal Records?
What records do you create? What information do you handle?
What is a Record?

The full definition of a Federal record, as presented in the **Federal Records Act (FRA)**, is:

“...all recorded information, regardless of form or characteristics, made or received by a Federal agency 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 United States Government or because of the informational value of data in them.” (44 U.S.C. 3301, Definition of Records)

Electronic records, as defined in the National Archives and Records Administration (NARA) regulations (36 CFR 1236), means any information that is recorded in a form that only a computer can process.
Key Terms, Phrases, and Concepts in the Definition

Several key terms, phrases, and concepts in the statutory definition of records are defined as follows:

- **Recorded Information** includes all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form.

- **Form or characteristics** means that the medium may be paper, and electronic, film, disk, or another physical type or form, and that the method of recording may be manual, mechanical, photographic, electronic, or any other combination of these or other technologies.

- **Made** refers to the act of creating and recording information by agency personnel in the course of their official duties, regardless of the method(s), medium, or media involved.

- **Received** means the acceptance or collection of documentary materials by agency personnel in the course of their official duties, regardless of the origin of the document(s).

- **Preserved** means filing, storage, or any other method used by an agency to maintain documentary materials systematically, regardless of medium.

- **Appropriate for preservation** means documentary materials made or received which should be filed, stored, or otherwise systematically maintained by an agency because of the evidence of agency activities or information they contain, even though the materials might not be covered by its current filing or maintenance procedures (36 CFR Part 1222, Subpart A, Section 1222.10).
Media Formats of Records

Routine **textual records** such as correspondence, memos, manuscripts, and reports are usually recognized as Federal records. Federal records can also exist in various formats and media:

- **Electronic Records** are records that are stored in a form that only a computer can process. Electronic records may be the products of office automation or larger transactional automated applications. As with all records systems, systems containing electronic records must be designed so that adequate maintenance and disposition procedures are planned during the system’s design phase.

- **Microform Records** are records in any form containing greatly reduced images, normally on microfilm and microfiche.

- **Scanned Records** are digital images of existing source documentary material. Textual scanned records that have been processed with Optical Character Recognition technology may also be searched (as opposed to simply viewed) by a computer.
• **Printed Records** are records that are published materials or serial issuances (such as annual reports, directives, and press releases) produced by or for a particular agency, in contrast to extra copies kept in stock or distributed inside or outside that agency. Each agency should designate an office of record to maintain a “record set” of each series. Agencies now post electronic copies of publication on their website and must maintain both hard copies and electronic versions appropriately.

• **Cartographic, Remote-Sensing Imagery, and Related Records** are graphic representations drawn to scale of selected features of the Earth’s surface and atmosphere, and of other planets and planetary satellites. They include maps, charts, photomaps, atlases, cartograms, globes, relief models, and related records, such as field survey notes, map-history case files, and finding aids. Also included are digital cartographic records, such as Geographic Information System (GIS) records. Cartographic, remote-sensing imagery and related records may be in hard-copy or electronic form, and need to be maintained appropriately.

• **Architectural, Engineering, and Related Records** are hard-copy and electronic drawings and related records depicting the concepts and precise measurements needed to plan and build static structures, such as buildings, bridges, and monuments. They include design, construction, and operations and maintenance drawings, and related records. Architectural, engineering, and related records may be in hard-copy or electronic form, and need to be maintained appropriately.

• **Audiovisual Records** are records in pictorial or audio form. They include still and motion pictures, graphic materials (such as posters and original art), audio and video recordings, multimedia presentations (such as slide-tape productions), digital photography (still and motion), and negatives, all of which have special handling requirements.

• **Card and Other Odd-Sized Paper Records** are records used as finding aids, such as card catalogs or indexes. Where these records are found, ensure that they are maintained in containers appropriate to their size. Do not mix them with other records. Databases have now often supplanted these types of card records.
Record Categories

Records can be categorized as program records or administrative records.

**Program records** are records that document the program’s unique, mission-related activities.

Examples of program records from the Indian Health Service (IHS) include:

- Environmental health project files
- Contract health services patient case files
- Tribal health program files

For example, if you are in the IHS mental health program, the majority of the program records maintained in your office will document mental health activities.

**Administrative records** relate to budget, personnel, supply, and similar housekeeping, or facilitative functions common to most agencies. These records comprise an estimated one-third of the total volume of records created by Federal agencies. Administrative records are an agency’s housekeeping support records.
Temporary vs. Permanent

All records have a lifecycle that includes creation, maintenance and use, and disposition. Disposition includes the approved destruction of temporary records and the transfer of permanent records to NARA.
Records are determined to be temporary or permanent by the Archivist of the United States.

- **Temporary records** are records approved by NARA for destruction after a specified retention period. The majority of Federal records are temporary. This means that, even if they are kept for 30 years, they will eventually be destroyed.

- **Permanent records** are records determined by NARA as having sufficient historical or other value to warrant continued preservation by the Federal Government beyond the time they are needed for administrative, legal, or fiscal purposes. Permanent records will eventually be transferred into the legal and physical custody of NARA. Government-wide, about 1–3 percent of Federal records are permanent. For your agency, depending on its function, the number might be higher or lower. For example, about 80 percent of U.S. Department of Justice litigation case files are permanent, and about 25 percent of the Federal Bureau of Investigation (FBI) investigation case files are permanent.

If NARA has not approved records as temporary or permanent, then they are unscheduled.

- **Unscheduled records** are records whose final disposition has not been approved by NARA. You may find unscheduled records when new programs are created or new systems are developed. Unscheduled records must be maintained as permanent records until they are properly scheduled as either temporary or permanent.
Record Values

Record value is based on the agency’s business needs and NARA’s judgment of historical value:

- The agency’s viewpoint:
  - Records are the basic administrative tool by which the agency conducts its business
  - Records document the agency’s organization, functions, policies, decisions, procedures, and essential transactions
  - 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
- Agency record values fall into three overlapping categories:
  - Administrative
  - Fiscal
  - Legal
• Understanding these values can help Agency Records Officers (AROs) propose to NARA retention periods that will satisfy agency needs.

• NARA’s viewpoint:
  – NARA designates records as permanent if they have sufficient historical or other value to warrant their continued preservation by the government. Such records may be kept mainly because they document an agency’s origins, organization, functions, and significant transactions and activities. They may also be kept because they document the persons, places, things, or matters dealt with by an agency – that is, because they contain information with significant research or reference value.
Lesson Summary

In this lesson, you learned:

- The definition of a Federal record
- That records exist in many different media and formats
- That records are either program or administrative
- That records are determined to be temporary or permanent by the Archivist of the United States
- That if records have not been approved as temporary or permanent, then they are unscheduled
- That record value is based on the agency’s business need and NARA’s judgment of historical value
Lesson 2: Records, Nonrecord Materials, Personal Papers, and Tough Calls
Is Everything a Record?

Not everything that crosses your desk is a Federal record. Records are only a subset of business information created by Federal agencies.

The other two types of materials created and maintained by Federal agencies are nonrecord materials and personal papers.

Why is this important?

You still need to manage these materials, because they are considered business information and might be subject to Freedom of Information Act (FOIA) requests and to discovery.
Some common examples of Federal records include:

- Time and attendance records
- Contracts
- Original drawings and specifications
- Project files
- Internal and external directives
- Personnel files
As workers employ new technologies to conduct business, today’s agencies are generating records that are increasingly complex. Here are various electronic records that most agencies now use:

- Email integrated with digital voicemail
- Electronic calendars
- Instant messaging (IM)
- Blogs and wikis
- Videoconferencing and webinars
- Remote communications, such as Personal Digital Assistants (PDAs)
Nonrecord Materials

Nonrecord materials are U.S. Government-owned documentary materials excluded from the legal definition of records (44 U.S.C. 3301), either by failing to meet the general conditions of record status already described, or by falling into one of three specific categories:

1. Extra copies of documents
2. Stocks of publications
3. Library and museum materials

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On the basis of these conditions and the categories specifically cited in the law, nonrecord materials include:

- Information copies in both hard-copy and electronic formats of correspondence, directives, forms, and other documents that no administrative action is recorded or taken; information, courtesy, or other copies of agency documents that do not require action and are not needed to document specific program activities of the receiving office
- Documents received that provide information but are not connected to the transaction of agency business (for example, many email messages received from listservs, journals, or other publications; training invitations; and catalogs and other mailings from vendors)
- Routing slips and transmittal sheets adding no substantial information to the transmitted material
- Tickler, follow-up, or suspense copies of correspondence, provided they are extra copies of the originals
• Duplicate copies of documents maintained in the same file and that exist in both hard-copy and electronic formats
• Extra copies of printed, processed, or electronic materials where the recordkeeping copy has been identified
• Catalogs, trade journals, other publications including electronic copies that are received from other government agencies, commercial firms, or private institutions that require no action and are not part of a case on which action is taken
• Physical exhibits, artifacts, and other material objects
Whether a particular document is a record does not depend on whether it is an original or a copy. As illustrated in the slide, several copies of a single form may each have record status, because each serves a separate administrative purpose and is maintained in a different filing system.
Is It a Record?

• “The current draft of a report you prepared on a program-related project; the draft is being sent around to others for comment.”
• “A full set of Sport Fishery abstracts published by the U.S. Fish and Wildlife Service, dating from 1941 to 1975, maintained by a regional office’s reference library.”

Refer to Handout 1.01 – Is It a Record? decision tree document (located in the Handouts section of your PG) to work through the next few examples.

Example 1:

“The current draft of a report you prepared on a program-related project. The draft is being sent around to others for comment.”

Is Example 1 a record?

Example 2:

“A full set of Sport Fishery abstracts published by the U.S. Fish and Wildlife Service, dating from 1941 to 1975, maintained in a regional office’s reference library.”

Is Example 2 a record?
Guidelines for Managing Nonrecord Materials

Guidance on nonrecord materials should be part of an agency’s records management program.

Here are records management guidelines to use in managing nonrecord materials:

- Within the agency, only the ARO should determine record or nonrecord status, after obtaining any necessary advice from the agency’s legal counsel. Giving such total responsibility to officials at agency staff or operating levels could lead to misuse of the “nonrecord” label, weaken the entire disposition program, and result in the loss of valuable records.

- The ARO should seek NARA’s guidance regarding the record or nonrecord status of a questionable file or type of document.

- When it is difficult to decide whether certain files are records or nonrecord materials, the ARO should treat them as records.

- Nonrecord materials should not be interfiled with records.

- Nonrecord materials should be destroyed when no longer needed for reference. NARA’s approval is not required to destroy such materials.

- Nonrecord materials should be removed from U.S. Government custody only with the agency’s approval. The agency should ensure adequate protection of any security-classified or administratively controlled information contained in such materials.
Personal Papers

Personal papers are documentary materials of a private or nonpublic character that do not relate to, or have an effect on, the conduct of agency business.

Examples include:
- Materials accumulated by an official before joining government service that are not used subsequently in the transaction of government business
- Materials relating solely to an individual’s private affairs
- Diaries, journals, personal correspondence, or other personal notes

Personal papers are excluded from the definition of Federal records, and are not owned by the government. However, the maintenance of personal papers in agency space and equipment requires compliance with Federal and agency requirements.
Examples of personal papers include:

- Materials accumulated by an official before joining government service that are not used subsequently in the transaction of government business
- Materials relating solely to an individual’s private affairs, such as outside business pursuits, professional affiliations, or private political associations that do not relate to agency business
  - Personal, family, or social correspondence
  - Insurance or medical papers
- Diaries, journals, personal correspondence, or other personal notes that are not prepared or used for, or circulated or communicated in the course of, transacting government business
  - Personal copies of personnel-related documents
### Personal Papers (cont’d.)

- Calendars are not considered personal papers
- Personal papers must be clearly designated and maintained separately from records
- If information about private matters and agency business appears in the same document, the document should be copied, the personal information deleted, and the document treated as a Federal record

---

**Three key points:**

1. Calendars are not considered personal papers, since they document agency business. These are scheduled by the General Records Schedules (GRS) if they do not involve a high-level official.

2. Some government employees, especially executives, senior staff, scientists, and other specialists, accumulate and keep various personal papers at the office. These personal papers must be clearly designated as such and maintained separately from records.

3. If information about private matters and agency business appears in the same document, the document should be copied at the time of receipt, the personal information deleted, and the document treated as a Federal record.
Example:

“A file maintained by a typical Federal employee containing copies of ‘Notification of Personnel Action’ Standard Form 50, and counseling and award letters from management.”

Is this example a record?
Managing Information: Records, Nonrecord Materials, and Personal Papers

The biggest difference in managing records, nonrecord materials, and personal papers is that Federal records must be managed in accordance with the FRA, which means that the Archivist of the United States has sole legal responsibility for determining which records are permanent (must be preserved) and which records are temporary (can be destroyed). In other words, Federal records differ from nonrecord materials and personal papers because they cannot be destroyed without the approval of the Archivist in the form of a records schedule or Electronic Records Archives (ERA) records schedule.

Nonrecord materials may be destroyed and deleted when no longer needed for reference, at the discretion of the agency.

Personal papers may be destroyed at the discretion of the owner.

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These distinctions notwithstanding, the Federal Rules of Civil Procedure force organizations to be aware of the electronically stored information (ESI) in their custody, **whether the information constitutes a record or not**. Litigation often demands that agencies preserve and provide access to this ESI. Courts may impose sanctions for failing to preserve ESI once litigation has begun.

Whether a record or not, whether paper or electronic, it is the agency’s responsibility to manage all the information it uses to carry out its work.
The following items present some common problem areas for Federal employees trying to identify what they have on hand:

- Working files
- Voicemail
- Email
- Instant messaging (IM)
- Text messaging
- Cloud computing
- Contractor records

The truth is that each of these documents may or may not be a Federal record or business information that needs to be managed. It depends on each specific situation. But if you recall the criteria we discussed earlier, you can usually figure it out.
Working Files

Attention should be given to working files, or working papers, because of the difficulty of determining record status. Active **working files** are records because they generally document the work completed during the course of the agency activity.

Other likely record categories include working files used in preparing reports or studies, and preliminary drafts of policy documents circulated for comment. In many cases, the “working” copy may be destroyed when the finalized document is published or sent. In other words, Federal records differ from nonrecord materials and personal papers because they cannot be destroyed without approval of the Archivist in the form of a records schedule, GRS authority, or ERA Records Schedule.

(Refer to **Handout 1.02** – Working Papers Quick Reference Guide, located in the Handouts section of your PG, for tips on identifying and managing working papers that are records.)
Preliminary drafts, rough notes, and other similar materials are maintained for purposes of adequate and proper documentation if:

- They were circulated or made available to employees other than the creator for official purposes such as approval, comment, action, recommendation, or follow-up
- They were circulated to communicate with agency staff about agency business
- They contain unique information, such as substantive annotations or comments included therein, which add to a proper understanding of the agency’s formulation and execution of basic policies, decisions, actions, or responsibilities
Some voicemail messages may be a record.

If your agency has a paper-based recordkeeping system, a transcript of substantive voicemail messages should be created, added to the related subject file, and handled accordingly. If the voicemail is digital and your agency has a Records Management Application (RMA), the digital voicemail should be saved into the RMA and managed there.
An email message can be a Federal record. It is in a different format than a paper document, but in content, it is no different from any other letter, memo, report, or other document that you receive in your daily work as a Federal employee.

Messages created or received on electronic mail systems may meet the definition of a record in 44 U.S.C. 3301. For electronic mail systems, agencies must ensure that all staff are informed of the potential record status of messages, and of the requirement to save transmittal and receipt metadata, as well as attachments, with the message and to maintain “historical” lists of directories and distribution lists.
Email Guidance - A New Approach

Capstone is a new records management approach for electronically managing Federal record emails. Using this approach, an agency can categorize and schedule email based on the work and position of the email account owner. The Capstone approach allows for the capture of records that should be preserved as permanent from the account of officials at or near the top of an agency or an organizational subcomponent.

For more information on this approach please visit http://www.archives.gov/records-mgmt/prmd.html.

Personal emails must be kept separate from official emails. It is a habit that everyone in your agency must develop.

Email records must be maintained in a recordkeeping system – either printed out and filed, or saved in an electronic RMA.

(Refer to Handout 1.03 – Email Quick Reference Guide, located in the Handouts section of your PG, for tips on identifying and managing emails that are records.)
Instant Messaging

Instant messaging (IM) is an electronic messaging service that allows users to exchange text messages with connected parties in real time. In addition to sending messages, users may have the ability to attach and exchange electronic files such as images, audio, video, and textual documents.

Although there are many types of IM clients, they all tend to function in a similar manner. Client software logs into a central server to create connections with other clients logged in at that same time. Users create and exchange messages through their local client application.

Agencies that allow IM traffic on their networks must recognize that such content may be a Federal record under that definition and must manage the records accordingly. Two possible ways are discussed below.

- Provide policies that inform users what steps to take to store and manage the content
- Configure the IM client or server to capture messages without user intervention. Nearly all client software has the ability to capture the content as either a plain text file or in a format native to that client. Generally, the location and maximum size of that file are determined by a configuration setting. Typically, this process operates at the server level and should be able to capture IM sessions regardless of the configuration of the individual client.
Text Messaging

Text messaging is also referred to as short message service (SMS). SMS is a service component of phone, web, or mobile communication system using standardized communications protocols that allow the exchange of short text messages between fixed line or mobile devices. The service allows for short text messages to be sent from one cell or digital phone to another or from the web to another PDA.
Cloud Computing

The following are guidelines for creating standards and policies for managing an agency’s records created, used, or stored in cloud computing environments:

- Include the ARO and staff in the planning, development, deployment, and use of cloud computing solutions.
- Define which copy of records will be declared as the agency’s record copy and manage these in accordance with 36 CFR Part 1222 ([http://www.archives.gov/about/regulations/regulations.html](http://www.archives.gov/about/regulations/regulations.html)).
- Remember, the value of records in the cloud may be greater than the value of any other set because of indexing or other reasons. In such instances, this added value may require designation of the copies as records.
- Include instructions for determining if Federal records in a cloud environment are covered under an existing records retention schedule.
• Include instructions on how all records will be captured, managed, retained, made available to authorized users, and retention periods applied

• Include instructions on conducting a records analysis, developing and submitting records retention schedules to NARA for unscheduled records in a cloud environment. These instructions should include scheduling system documentation, metadata, and related records.

• Include instructions to periodically test transfers of Federal records to other environments, including agency servers, to ensure the records remain portable

• Include instructions on how data will be migrated to new formats, operating systems, etc., so that records are readable throughout their entire lifecycle. Include in your migration planning provisions for transferring permanent records in the cloud to NARA. An agency choosing to pre-accession its permanent electronic records to NARA is no longer responsible for migration except to meet its business purposes.

• Resolve portability and accessibility issues through good records management policies and other data governance practices. Data governance typically addresses interoperability of computing systems, portability of data (able to move from one system to another), and information security and access. However, such policies by themselves will not address an agency’s compliance with the FRA and NARA regulations.
Contractor Records

If your agency uses private contractors, a primary concern is to ensure that the contracts spell out recordkeeping requirements incumbent on the contractors.

For example, when contractors create data for your agency, you may need to specify the delivery of background data that may have reuse value. So, in addition to the final product, the contractor may need to document an entire process and turn over incremental information that may be of use to the government.

Of course, in addition to actual project data, a contractor may be required to provide basic business documentation, such as personnel and expense reports.
Activity: Tough Calls

Slide 1-30

NOTES
Tough Calls Worksheet

You will need to distinguish among records, nonrecord materials, and personal papers. Oftentimes, identifying a document’s correct status will be a tough call.

Directions: Place “R” next to the examples of materials that you think are records. Place “NR” next to the examples you think are nonrecord materials. Place “P” next to the examples you think are personal papers.

Table 1-3: Module 1 Review Activity: Tough Calls Worksheet

<table>
<thead>
<tr>
<th>TYPE OF MATERIAL</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Photographic print created by a National Park Service construction office documenting the insertion of a drainage pipe in the driveway of the visitors’ center at the Gettysburg Memorial. There are also three other photographs taken from almost the identical angle.</td>
</tr>
<tr>
<td>2.</td>
<td>A complete set of design specifications prepared by the engineering branch of the Federal Highway Administration prior to construction of a road. The specifications are duplicated in the files of the state highway office.</td>
</tr>
<tr>
<td>3.</td>
<td>A sound recording of a U.S. District Court trial hearing. The proceedings have also been transcribed on paper.</td>
</tr>
<tr>
<td>4.</td>
<td>8-millimeter digital tapes containing system, application, and data files (the total network backup) from six months earlier. The tapes are stored off-site. Many of the same user-created files can still be found in later backup tapes and “live” on the server.</td>
</tr>
<tr>
<td>5.</td>
<td>Supervisor notes that consist of handwritten and electronic notes documenting performance and behavioral problems or activities and accomplishments of employees in the manager’s department.</td>
</tr>
<tr>
<td>6.</td>
<td>A full set of reading and chronological files created by the assistant regional administrator for Housing and Urban Development, covering the years 1969 to 1995.</td>
</tr>
<tr>
<td>TYPE OF MATERIAL</td>
<td>DESCRIPTION</td>
</tr>
<tr>
<td>------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>7.</td>
<td>Three bookshelves containing numbered directives, instructions, procedures, and orders received by the Bureau of Reclamation’s Salt Lake City, Utah, regional office from Bureau headquarters in Denver, Colorado, dating from 1977 to the present. Many of the directives are still in effect.</td>
</tr>
<tr>
<td>8.</td>
<td>An email message stored on the hard drive of a Bureau of Land Management (BLM) realty specialist in the St. George, Utah, district office. The message was sent by the headquarters office and requests that the realty specialist investigate a public land transaction and report on it. Copies of the message also reside on the computers of the headquarters sender, as well as the district office employee’s supervisor and secretary.</td>
</tr>
<tr>
<td>9.</td>
<td>A letter from a local rancher, which is maintained by the Environmental Protection Agency’s (EPA’s) Denver, Colorado, regional office. The letter regards an ongoing environmental impact statement project for the building of a reservoir and dam in a scenic mountain area. It is one of several hundred similar letters sent by other local residents that are maintained by EPA.</td>
</tr>
<tr>
<td>10.</td>
<td>A box of old mechanical drawings maintained by the facilities’ department of the Bureau of Indian Affairs (BIA) for equipment still in use on the Cheyenne River Reservation in South Dakota. The drawings were created by the private-sector manufacturer of the equipment.</td>
</tr>
<tr>
<td>11.</td>
<td>A file drawer of copies of travel vouchers maintained by a National Institute of Standards and Technology scientist. The scientist uses the vouchers, some of which are 10 or more years old, to keep track of hotels and other accommodations from past trips in case she travels to the same destination at some future date.</td>
</tr>
<tr>
<td>12.</td>
<td>The official files of the secretary of the local chapter of ARMA International. The secretary is employed as the ARO at the Federal Deposit Insurance Corporation in Denver, Colorado.</td>
</tr>
<tr>
<td>TYPE OF MATERIAL</td>
<td>DESCRIPTION</td>
</tr>
<tr>
<td>------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>13.</td>
<td>A telephone call between an Internal Revenue Service (IRS) criminal investigator and her counterpart at the IRS in San Diego, California, in which the following information is discussed: the weather, vacation plans, the upcoming Broncos-Chargers game, and a commitment on the part of the Denver investigator to conduct a background check on a suspected tax evader on behalf of the San Diego investigator.</td>
</tr>
<tr>
<td>14.</td>
<td>The financial database computer files entered by a General Services Administration (GSA) employee in Denver, Colorado. The entered files, still residing on the hard drive of the Denver employee’s computer, were batched in the network server and transmitted electronically to the finance center in Kansas City, Missouri, where they were processed with other submissions from around the United States to generate bills and payments for GSA offices.</td>
</tr>
<tr>
<td>15.</td>
<td>Author’s copy of classified intelligence reports on foreign weapons capabilities.</td>
</tr>
<tr>
<td>16.</td>
<td>Licensing program working files such as notes, drafts, and other similar materials not maintained as part of the official project file.</td>
</tr>
<tr>
<td>17.</td>
<td>Drafts, notes, and memoranda collected by attorneys. Recordkeeping copies of completed legal work product created by attorneys in the office are placed in the appropriate official file.</td>
</tr>
</tbody>
</table>
Lesson Summary

In this lesson, you learned:

- That not all documentary materials your office creates or receives are Federal records
- That nonrecord materials are U.S. Government-owned documentary materials excluded from the legal definition of records
- That personal papers are documentary materials of a private or nonpublic character that do not relate to, or have an effect on, the conduct of agency business
- The differences among records, nonrecord materials, and personal papers
- Some common problem areas in trying to determine the correct status of records, nonrecord materials and personal papers
- The definition and challenges of cloud computing
Module 1 Review and Wrap-Up

Slide 1-31
Module 1: Creating and Identifying Federal Records
Module 1 Review and Wrap-Up

Module Review

Slide 1-32

In Module 1, you learned:

- What a record is
- That records exist in different media and formats
- The definition of nonrecord materials
- The definition of personal papers
- Records categories
- That records are determined to be temporary or permanent by the Archivist of the United States
- That if records have not been approved as temporary or permanent, they are unscheduled
- Not all documentary materials your office creates or receives are Federal records
- How to properly manage records, nonrecord materials, and personal papers
- Common problem areas and tough calls
- Guidelines for managing records in the cloud
Reflect upon what you have learned in Module 1 and how you will apply it to your job.
### Module 1 - Action Items Worksheet

<table>
<thead>
<tr>
<th>What did I learn about creating and identifying Federal records that will help me at my job?</th>
</tr>
</thead>
<tbody>
<tr>
<td>List at least one thing you learned about creating and identifying Federal records that is relevant to your job role and responsibilities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>How will I apply what I learned about creating and identifying Federal records to my job?</th>
</tr>
</thead>
<tbody>
<tr>
<td>List at least one thing you learned about creating and identifying Federal records that you will apply to your job, and explain how you will apply it.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What “aha!” moments did I have during this module?</th>
</tr>
</thead>
<tbody>
<tr>
<td>List any “aha” moments you experienced during this module.</td>
</tr>
<tr>
<td>(“Whether a particular document is a record does not depend on whether it is an original or a copy?? Aha!”)</td>
</tr>
</tbody>
</table>
[This page intentionally left blank.]
Knowledge Area 2: Creating and Maintaining Agency Business Information

Module 2: The 3 R’s: Requirements, Roles, and Responsibilities
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<td>Federal Rules of Evidence (FRE)</td>
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<td>Clinger-Cohen Act (40 U.S.C. 1401)</td>
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<td>Health Insurance Portability and Accountability Act (P.L. 104-191)</td>
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Introduction and Objectives

Overview

This module explores recordkeeping requirements that ensure the creation and maintenance of records that document business operations adequately and properly.
Module 2 Learning Objectives

At the conclusion of this module, you will be able to:

• Identify recordkeeping requirements
• Determine the agency, program, series, and system recordkeeping requirements
• Determine the use of 36 CFR, ISO 15489-1 Information and Documentation – Records Management, Part 1: General, and the DoD Standard 5015.2
• Identify the various records statutes and issuances associated with maintaining agency business information
• Identify recordkeeping roles and responsibilities

At the conclusion of this module, you will be able to:

• Identify recordkeeping requirements
• Determine the agency, program, series, and system recordkeeping requirements
• Identify the various records statutes and issuances associated with maintaining agency business information
• Identify recordkeeping roles and responsibilities
Lesson 1: What Are Recordkeeping Requirements?

Recordkeeping Requirements and Your Business Process

Recordkeeping requirements are vital to organizing, maintaining, and retrieving information. The way to ensure that your agency has appropriate documentation of its activities, and is creating and maintaining information properly, is to develop recordkeeping requirements.
Recordkeeping Requirements

Recordkeeping requirements are statements in statutes, regulations, agency directives, or other issuances that specify which records are to be created or received and maintained by agency personnel.

The National Archives and Records Administration (NARA) uses the term **recordkeeping requirements** to refer to the statements in statutes, regulations, agency directives, or other issuances that specify which records are to be created or received and maintained by agency personnel.
Scenario:

You work for the Bureau of Public Recreation (BPR) in Washington, DC, and are in charge of an investigation on the impact of hazardous waste and water conditions at various sites around the country. Staff members from Washington, Seattle, Ft. Worth, and Miami are working together and individually on certain aspects of the investigation.
Module 2: The 3 R’s: Requirements, Roles, and Responsibilities
Lesson 1: What Are Recordkeeping Requirements?

Issues to consider with regard to recordkeeping requirements:

- What are some of the communication issues that the project team must deal with when managing the project from four major cities?
- Who is responsible for the records of the investigation?
- Are the records centralized, or does each location keep separate files?
- What are working papers, and how are they managed?
- What filing systems are in use and are they the same in each location?
- Which location is responsible for maintaining the recordkeeping copy of electronic records?
- Are there naming convention standards for electronic and special media records?
- What standards are in place for version control of shared electronic records?
Adequate and Proper Documentation

The law and NARA regulations state agencies must have adequate and proper documentation:

The head of each Federal agency shall make and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency. These records must be 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 U.S.C. 3101 and 36 CFR 1220.30)

To achieve adequate and proper documentation, NARA requires an agency to establish recordkeeping requirements:

The clear articulation of recordkeeping requirements by Federal agencies to their staff is essential if agencies are to meet the requirements of 44 U.S.C. 3101 and 3102 with respect to creating, receiving, maintaining, and preserving adequate and proper documentation, and with respect to maintaining an active, continuing program for the economical and efficient management of agency records. (36 CFR 1222.30)
The Office of Management and Budget (OMB) mandates in its Circular A-130 that recordkeeping requirements be built into information systems.

OMB Circular A-130 specifically states:

- Agencies shall plan in an integrated manner for managing information throughout its lifecycle
- Agencies shall incorporate records management and archival functions into the design, development, and implementation of information systems
- Record, preserve, and make accessible sufficient information to ensure the management and accountability of agency programs, and to protect the legal and financial rights of the Federal Government
The 5 C’s

- Complete: Is the entire transaction documented?
- Consistent: Are all offices handling the record the same way?
- Concise: Is only the necessary documentation included in the record?
- Compliant: Does this meet all legal and business needs?
- Cost-effective: Is this the most efficient way to handle the records?

Recordkeeping requirements are the means to implement “adequate and proper documentation,” and allow agencies to create and maintain documentation that is:

- Complete: Is the entire transaction documented?
- Consistent: Are all offices handling the record the same way?
- Concise: Is only the necessary documentation included in the record?
- Compliant: Does this meet all legal and business needs?
- Cost-effective: Is this the most efficient way to handle the records?
Lesson Summary

In this lesson, you learned:

- Recordkeeping requirements are vital to organizing, maintaining, and retrieving information
- Laws and regulations require adequate and proper documentation of government activity
- Recordkeeping requirements are the means to implement “adequate and proper documentation”
- Recordkeeping requirements allow agencies to create and maintain documentation that is:
  - Complete
  - Consistent
  - Concise
  - Compliant
  - Cost-effective
Lesson 2: Agency, Program, Series, and System Recordkeeping Requirements

How Do You Develop Requirements?

Because agency functions, activities, and administrative practices vary so widely, NARA cannot issue a comprehensive list of all categories of documentary materials appropriate for preservation by an agency. In all cases, the agency must consider the intent or circumstances of creation or receipt of the materials to determine whether their systematic maintenance must be required [36 CFR 1222.30(c)].
NARA established general recordkeeping requirements in 36 CFR 1222.24:

Agencies must ensure that procedures, directives, systems planning and development documentation, and other relevant records include recordkeeping requirements for records in all media, including those records created or received on electronic mail systems. Recordkeeping requirements must:

1. Identify and prescribe specific categories of records to be systematically created
2. Specify the use of materials and recording techniques
3. Specify the manner in which these materials are maintained
4. Propose how long records must be maintained
5. Distinguish records from nonrecord materials
6. Ensure that departing employees do not remove Federal records
7. Define the recordkeeping responsibilities of all employees

NOTES

Knowledge Area 2: Creating and Maintaining Agency Business Information
January 2017
Levels of Recordkeeping Requirements

Because NARA cannot define requirements for all Federal processes and functions, agencies must also determine three additional levels of requirements.

There are three levels of recordkeeping requirements:

- Agency requirements
- Program requirements
- Record series and system requirements
Agency Requirements

Slide 2-11

The agency is responsible for developing the overall framework for recordkeeping requirements, including:

- Defining records and nonrecord materials
- Outlining program responsibilities
- Overseeing records creation and disposition
- Maintaining the management and preservation of records
- Making records management a senior leadership priority
- Reporting to NARA and OMB their plans for improving their records management programs, with emphasis on electronic records

To ensure that complete and accurate records are made and retained in the Federal Government, it is essential that agencies distinguish between records and nonrecord materials by appropriately applying the definition of records (see 44 U.S.C. 3301 and 36 CFR 1220.18) to agency documentary materials.

Applying the definition of records to most documentary materials created or received by agencies presents few problems when agencies have established and periodically updated...
recordkeeping requirements covering all media and agency activities at all levels and locations (36 CFR 1222.12).

Comply with the November 28, 2011, Presidential Memorandum, “Managing Government Records Directive” by the following deadline dates:

- 2014: Agency Records Officers (AROs) hold the NARA training certificate and establish records management
- 2016: Agencies manage all email records in electronic format, SAOs ensure records schedules submitted to NARA
- 2019: Federal agencies manage all permanent records electronically
Specific agency guidance may be needed for some areas of concern:

- Organizationally sensitive and political decision-making
- Actions taken at formal meetings
- Working files
- Electronic systems
- Contractor records
- Vital records

Agencies typically have agency-specific programs or tasks for which they need to establish additional guidance to meet their requirement for recordkeeping.

These types of records may include records that document:

- Organizationally sensitive and political decision-making, whether conducted orally or electronically:
  - Memos for the record must be created, signed and dated, and filed when telephone or person-to-person conversations take place where decisions regarding agency policies, procedures, or programs are made
  - Copies of electronic mail, facsimiles, text messages, and the like, documenting agency activities must be filed in a recordkeeping system

- Actions taken at formal meetings
  - Minutes created and filed in an appropriate recordkeeping system
  - Meeting documentation such as names, organization titles of participants, an agenda, and handouts. If a meeting is recorded, and a transcription made and filed, all speakers with titles should be identified on the transcript and video.
– Actions at formal meetings should be recorded as a matter of course, because formal meetings should designate a secretary or scribe who takes minutes and notes on the meeting

• Working files, including drafts and background materials:
  – Working files may be Federal records. They might be needed to fully understand the basis for deciding on a course of action.
  – Special attention should be given to working papers such as emails, electronic documents, notebooks, notes, and other background materials

• Electronic systems containing Federal records must be identified and managed. This includes databases, email, word processing, other office automation applications, and imaging systems. Information Technology (IT) needs to be aware of OMB Circular A-130 http://www.whitehouse.gov/omb/circulars/a130/a130trans4.html.

(Refer to Handout 2.01 – Email Directive, located in the Handouts section of your Participant Guide [PG], for an example of an email directive used to inform agency employees of the requirements for email.)

• Contractor records are subject to agency records management requirements. Any contract between the agency and contractor must contain specific information regarding the maintenance and delivery of all data needed for the adequate and proper documentation of the contractor-operated program(s) in accordance with the Federal Acquisition Regulation (FAR). The contract must specify timely deliverance ownership of the records at the conclusion of the contract. For example:
  – Contracts should specify the delivery of background material as needed by the agency
  – Contracts should include all related finding aids and indexes
  – Program and contracting officials should consult with the agency records management office to ensure that all long-term needs are met
  – Deferred ordering and delivery of data clauses – These clauses must be included in contracts whenever it is impossible to identify in advance all records and data that may be delivered to the government. The agency may wish to require the contractor to prepare a data inventory, which could be used to identify data for deferred ordering and delivery as additional data requirements are identified.

(Refer to Handout 2.02 – Contractor Records Retention, located in the Handouts section of your PG, for the text of the FAR related to contractor recordkeeping.)
Vital records, also known as essential records, are essential agency records that are needed to meet operational responsibilities under national security emergencies or other emergency or disaster conditions (emergency operating records), or to protect the legal and financial rights of the government and those affected by government activities (legal and financial rights records) as defined in 36 CFR 1223.1. An agency’s vital records program must contain all elements listed in the Federal Emergency Management Agency’s (FEMA’s) Federal Continuity Directive (FCD) 1, Annex I (incorporated by reference, see 36 CFR 1223.14). In carrying out a vital records program, agencies must:

- Specify agency staff responsibilities
- Appropriately inform all staff about vital records
- Ensure that the designation of vital records is current and complete
- Ensure that vital records are adequately protected, accessible, and immediately usable

Creation and maintenance requirements to consider for vital records (Essential Records Management):
- Records may be maintained on a variety of media including paper, magnetic tape, optical disk, photographic file, and microform [36 CFR 1223.18 (b)]
- Retrieval procedures for vital records that are easily implemented, especially because an individual unfamiliar with the records may need to use them in an emergency (36 CFR 1223.20)
- In selecting the media, agencies must ensure that equipment needed to read the specific media will be available following an emergency or disaster [36 CFR 1223.18 (b)]

Protection may be performed via:
- Duplication. Agencies may choose to duplicate vital records as the primary protection method [36 CFR 1223.22 (a)].
- Storage. Copies of emergency operating vital records must be accessible in a very short period of time for use in the event of an emergency (36 CFR 1223.22).
- Dispersal. Once records are duplicated, they must be dispersed to sites a sufficient distance away to avoid being subject to the same emergency (36 CFR 1223.22).
Program Requirements

Beneath the umbrella of agency requirements, there is a level of program-specific requirements. These requirements address the types of records that an agency must keep to adequately and properly document program activities. When creating the program requirements, the following questions should be answered:

• Which records need to be created?
• Which unit is the office of record?
• How are the records related?
• How long should records be kept?

The Environmental Protection Agency (EPA) runs a major Superfund program that deals with toxic waste site remediation. This program contains certain legal and operational standards dictating how EPA must create and maintain information related to these sites. EPA identified the typical records that document a Superfund project and the records management responsibilities of offices throughout the agency.
(Refer to the EPA Superfund Documentation Strategy Example, located on page PG 2-21 of your PG, for an example of program-specific requirements.)

### Table: Superfund Documentation Strategy

<table>
<thead>
<tr>
<th>Type of Record</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative records</td>
</tr>
<tr>
<td>Cost recovery records</td>
</tr>
<tr>
<td>Site file records</td>
</tr>
<tr>
<td>Contract, grant and interagency agreement records</td>
</tr>
<tr>
<td>Records related to CERCLA and other electronic systems (data and documentation)</td>
</tr>
<tr>
<td>Enforcement records</td>
</tr>
<tr>
<td>Litigation support records</td>
</tr>
<tr>
<td>Laboratory analytical records</td>
</tr>
<tr>
<td>Records in the Office of Research and Development</td>
</tr>
<tr>
<td>Policies, directives, procedures, and guidance documents</td>
</tr>
<tr>
<td>Publications developed in Superfund</td>
</tr>
<tr>
<td>Program planning documents</td>
</tr>
<tr>
<td>Oversight documents</td>
</tr>
</tbody>
</table>

Recent trends involve storing these records in all Agency offices of Headquarters, the Regions, and at EPA Laboratories. This will include paper, microfilm, electronic information systems, maps, mapsheets, floppy disk systems, computer records, as well as paper files.
Example of Program-Specific Requirements -
EPA Superfund Documentation Strategy

The following are among the principal types of records necessary for documenting the Superfund program:

- Administrative records
- Cost recovery records
- Site file records
- Contract, grant and interagency agreement records
- Records related to CERCLIS, and other electronic systems (data and documentation)
- Enforcement records
- Litigation support records
- Laboratory analytical records
- Research records in the Office of Research and Development
- Policies, directives, procedures, and guidance documents
- Publications developed in Superfund
- Program planning documents
- Oversight documents

Records falling under each of these types may be found in all Agency offices at Headquarters, in the Regions, and at EPA Laboratories. They will include paper, microform, electronic information systems, maps, geographic information systems, computer models, as well as paper files.

– Taken from a EPA legacy website.
For each Superfund project, an office is selected to maintain specific records. For example:

- Headquarters oversight offices usually have policy, procedures, directives, as well as publications and program planning documents.
- Litigation support records are usually held by the regional and headquarters Offices of the General Counsel.
- Laboratory and research and development records are usually held by the EPA Laboratories.

The length of time the offices keep the records may vary. For example, many of the administrative records have a short retention period, whereas the litigation, policies, directives, and site file records are permanent. As you can imagine, Superfund site-cleanup records need to be maintained for many years.
Record Series and System Requirements

The third level of recordkeeping requirements identifies which records are to be included in a specific record series or system.

A record series is a collection of records that relate to the same subject matter, result from the same activity, or document a specific kind of transaction.

An information system is the organized collection, processing, transmission, and dissemination of information in accordance with defined procedures, either automated (electronic) or manual.
To ensure that record series and systems adequately document agency policies, transactions, and activities each program must develop recordkeeping requirements for records series and systems that include, as cited in 36 CFR 1222.28:

a) Identification of information and documentation that must be included in the series and system

b) Arrangement of each series and the records within the series and system

c) Identification of the location of the records and the staff responsible for maintaining the records

d) Policies and procedures for maintaining the documentation of phone calls, meetings, instant messages, and electronic mail exchanges that include substantive information about agency policies and activities

e) Policies and procedures for identifying working files and for determining the record status of working files in paper and electronic form

f) Policies and procedures for maintaining series consisting of different media

NOTES
What Would Happen If…

What would happen if you did not have good series and system recordkeeping requirements?

Scenario:

In the BPR hazardous water investigation, the Hazardous Waste and Emergency Management Program staff members did not properly maintain their records. For years, they interfiled and mixed project lab notes, travel vouchers, field notes, reference materials, drafts, unlabeled CDs, and maps. They just threw everything into folders with the project name and then threw the folders in a box at the end of the project.

A major lawsuit arose, accusing the agency of waste and fraud. This lawsuit made the front page of the *Wall Street Journal* with big headlines and a full-page news article. U.S. Department of Justice (DOJ) attorneys and paralegals conducted a project review. As a result of the review, the BPR staff were tasked to re-do the files, including labeling file folders, sorting and arranging documents, and identifying nonrecord materials and personal papers. The electronic records were also disorganized and even more difficult to manage because of a lack of standard naming conventions, lack of system documentation, and outdated hardware and software.
General Requirements for Records

According to ISO 15489-1, Section 7.2.1:

A record should correctly reflect what was communicated or decided or what action was taken. It should be able to support the needs of the business to which it relates and be used for accountability purposes.

In a traditional paper environment, series requirements included content, arrangement, identification, filing, and retention. In the electronic environment, system requirements are a bit more complex. The records in paper or electronic form have the same basic characteristics and requirements.

Also cited in 36 CFR 1236.10 are the general requirements for records, including:

- Content
- Context
- Structure
Content

Content refers to what a record says; it is the data and information contained in the record.

Whether you are speaking of paper or electronic, what needs to be captured in the record?

Examples may include:

- Memos with metadata information (to and from, and so forth) and attachments
- Email with metadata and attachments
- Drafts if they show corrections and revisions

NOTES
Notes
Context refers to what makes the record meaningful. It tells why a record was created and describes its relationship to other records, such as approval, agreement, etc.

The context of a record includes its placement (arrangement) in a file, either paper or electronic.
"I thought about that. My plan was just to leave that as the last action until it was signed. Or, maybe we should add ‘sent for signature’ to the taxonomy. What’s your thought?"

The business context in which the record was created, received, and used should be apparent in the record (including the business process of which the transaction is part, the date and time of the transaction, and the participants in the transaction).
An example of context is shown on slide 2-24. Do you know what this list is?
Structure refers to how information is organized, which greatly affects our ability to understand it.

Whether paper or electronic records, the following questions are considered for structure:

- How is the series or system arranged?
- How is the content or context organized?
With electronic records, structure is particularly important.
The way information is structured can contribute to or detract from one’s ability to understand the information, and to locate specific information when it is needed.
Records Retention Requirements

Just as the paper series requires identifying retention, electronic systems require retention. Electronic records retention sometimes may mirror the paper retention of the same series because they are needed for the same amount of time and for the same purpose.

Questions to ask to set up retention requirements, whether the records are paper or electronic:

- How long are the records needed to meet the business needs of the agency?
- What is the total retention?
- What is the administrative, fiscal, legal, or historical and research value of the record?
The U.S. Department of Defense (DoD) Standard provides a generic set of requirements for electronic records management applications (RMAs). Due to the differences in agency business needs and technology infrastructure, the DoD requirements may not be sufficient for use by other agencies or organizations. An organization will want to start with the 5015.2 requirements as a baseline, and then determine whether it has additional specific requirements.

DoD 5015.2 sets design criteria standards for RMA. RMA is software used to manage records including disposition.

- Mandatory baseline requirements for RMA software used by DoD components
- Minimum records management requirements that must be met based on NARA regulations and 44 U.S.C. 2902
- Consistent guidelines for software products designed to manage records (primarily electronic records)

DoD 5015.2 is reviewed not only by DoD, but also by a committee of professionals from various industries and sectors, including NARA and professional organizations. It is a dynamic standard that is constantly evolving.
DoD Standard 5015.2 (cont’d.)

- Covers more detailed requirements such as:
  - Accommodating dates and date logic
  - Implementing standard metadata
  - Backward compatibility
  - Accessibility
- Freedom of Information Act (FOIA) and Privacy Act (PA)
  - Additional metadata
  - Workflow and alerts
- Interoperability
  - Data discovery standards
  - Import and export standards
  - Transfer of permanent records to NARA

• Also covers more detailed requirements such as:
  - Accommodating dates and date logic
  - Implementing standard metadata
  - Backward compatibility
  - Accessibility

Freedom of Information Act (FOIA) and Privacy Act (PA)
  • Additional metadata elements
  • Workflow and alerts based on timing requirements

Interoperability
  • Data discovery standards
  • Import and export standards for moving records between 5015.2-compliant systems
  • The transfer of permanent records to NARA
There are also nonmandatory features included in the DoD Standard. These are functions needed for specific activities, and should be identified by the agency as requirements. They are useful features, but cannot be made mandatory because no Federal law or NARA regulation requires them. They include such things as:

- Imaging
- Workflow and document management features

National Archives Guidance

Electronic Records Management Guidance on Methodology for Determining Agency-Unique Requirements (Handout 2.03 in the Handouts section) was produced by NARA and provides assistance for agencies as they plan and design their own enterprise-wide Electronic Records Management (ERM) systems.

Refer to Handout 2.04 – Guidelines and Standards for Implementation of Electronic Document Management Systems (EDMS), located in the Handouts section of your PG, for an example of agency-unique requirements.

This guidance should be interpreted as a “best practice” that agencies should adhere to when deciding to customize 5015.2-certified RMA software.

For further information on ERM guidance documents please see http://www.archives.gov/records-mgmt/initiatives/erm-overview.html.

NOTES
The following four requirements are essential to the existence of your recordkeeping system:

- Creation requirements
- Metadata requirements
- Maintenance and use requirements
- Disposition requirements
Creation Requirements

Indicate when an electronic document is a Federal record
Link supporting and related records
Store and view files in their native formats
Define records identification and filing codes
Prevent subsequent changes to documents designated as records

NOTES

Knowledge Area 2: Creating and Maintaining Agency Business Information  
January 2017
Metadata Requirements

Slide 2-35

Metadata Requirements

- Assign or capture required metadata for each record
- Allow it to be viewed with the related record
- Include metadata attributes
- Combine email messages with their metadata and save as a single record
- Incorporate automatic date-stamping
- Allow a record to be assigned to more than one file category

Metadata requirements:

- Assign or capture required metadata for each record
- Allow it to be viewed with the related record
- Include metadata attributes such as office of origin, file code, keywords (for retrieval), addressee, signatory, author, date and time transmitted and received, authorized disposition, security classification, and information on related records filed elsewhere in paper or on the computer
- Combine email messages with their metadata (to and from, transmission and receipt, date and time, etc.) and save as a single record
- Incorporate automatic date-stamping so that dates cannot be changed
- Allow a record to be assigned to more than one file category when appropriate
Maintenance and Use Requirements

- Enable the agency to determine and control the level of access to the recordkeeping system
- Maintain electronic records to ensure their integrity
- Distinguish between the final version of a record and a working version
- Support multiple-use access
- Provide an index of all records
- Create backup or redundant copies of the records
- Maintain system documentation and audits

Maintenance and use requirements:

- Enable the agency to determine and control the level of access to the recordkeeping system for authorized system users
- Maintain electronic records in a manner that ensures their integrity, so that records cannot be changed or destroyed without authorization and designate changed or revised documents as new records with different identification data
- Distinguish between the final version of a record and a working version, both when viewing a document and on the list of documents produced in response to a query
- Support multiple-use access, when desired by the agency
• Provide an index of all records, including those online and those in near-line or offline storage
• Provide the ability, as determined by the agency, to automatically create backup or redundant copies of the records and their metadata
• Maintain system documentation and audits to ensure the integrity, authenticity, and legal acceptability of the records for their entire lifespan

Note: Many recordkeeping systems fail because “we got what we asked for, but what we asked for was not what we wanted.” It is not the system that fails; it is the requirements that do not fully describe the business process and the desired outcome.
Disposition Requirements

- Enable the agency to implement authorized disposition schedules
- Require an authorized individual to review and validate record destruction and transfer
- Enable the ARO or designated official to review, update, and change disposition
- Identify unscheduled records and initiate the scheduling process
- Provide an audit trail of disposition actions

Disposition requirements:

- Enable the agency to implement authorized disposition schedules and maintain and transfer permanent electronic records in compliance with specifications identified by NARA (36 CFR 1235.46)
- Require an authorized individual to review and validate record destruction and transfer
- Enable the ARO or designated official to review, update, and change disposition
- Identify unscheduled records and initiate the scheduling process
- Provide an audit trail of disposition actions

When you are developing requirements, just remember that the right people need to be on the team, or you may not get complete requirements and the desired outcome.
Activity: Determine Requirements

Slide 2-38

Activity
Determine Requirements
Determine Requirements Worksheet

Use the descriptions of the BPR offices in Handout 2.05 and answer the following questions about the program recordkeeping requirements for your assigned office.

Office name: ________________________________________________

1. What records are created by this office?

2. Are any of these records related to records created by another office?

3. For each series of records, would you create and maintain it in paper, electronic, or audiovisual form, and why?
4. What are the metadata requirements?

5. Assign what you think are appropriate disposition requirements for each series and system.
Lesson Summary

In this lesson, you learned:

- Each agency must consider the intent or circumstances of creation or receipt of the materials to determine whether systematic maintenance is required
- The three levels of recordkeeping requirements
- General requirements of records
- OMB mandates recordkeeping requirements be built into information systems
- ISO 15489-1 and DoD 5015.2 can help agencies develop recordkeeping practices to meet their requirements
- Agencies often have unique recordkeeping requirements beyond DoD 5015.2 that must be identified and met
- The records lifecycle requirements
Lesson 3: Ensuring Trustworthiness Using ISO 15489-1 and 36 CFR

Slide 2-39
Trustworthiness

Records need to be trustworthy.

The trustworthiness of a record is established by thoroughly documenting the recordkeeping system’s operation and the controls imposed upon it.

Records show whether an agency, or responsible individuals meet legal, organizational, social, and moral obligations. Records are consulted as proof of activity by senior managers, auditors, concerned citizens, and anyone inquiring into a decision or process, or the performance of an organization or an individual.
Agencies must incorporate controls into the electronic information system or integrate them into a recordkeeping system that is external to the information system itself.

Similar to the ISO Standard, 36 CFR, Section 1236.10, Judicial Use of Electronic Records, also requires trustworthy characteristics.

Electronic records may be admitted as evidence in Federal courts for use in court proceedings [Federal Rules of Evidence 803(8)] if trustworthiness is established by thoroughly documenting the recordkeeping system’s operation and the controls imposed upon it.
Agencies should implement the following procedures to enhance the legal admissibility of electronic records:

1. Document that similar kinds of records generated and stored electronically are created by the same processes each time and have a standardized retrieval approach.
2. Substantiate that security procedures prevent unauthorized addition, modification, or deletion of a record and ensure system protection against such problems as power interruptions.
3. Identify the electronic media on which records are stored throughout their lifecycle, the maximum time span that records remain on each storage medium, and the NARA-approved disposition of all records.
4. Coordinate all of the above with legal counsel, senior IT, and records management staff.
Reliability, authenticity, integrity, and usability are the characteristics used to describe trustworthy or authoritative records.

- **Reliability:** Controls to ensure a full and accurate representation of the transactions, activities, or facts to which they attest and can be depended upon in the course of subsequent transactions or activities
- **Authenticity:** Controls such as audit trails, to ensure records are complete and unaltered
- **Integrity:** Controls to protect against unauthorized addition, deletion, alteration, use, and concealment
- **Usability:** Mechanisms to ensure records can be located, retrieved, presented, and interpreted

An agency needs to consider these characteristics when planning to implement an electronic records system, so that it can meet its internal business needs, legal needs, and external regulations or requirements.
What Would Happen If...

What would happen if you did not have trustworthy records?

Below is an example of a situation in which recordkeeping systems might lack trustworthiness:

- If you work in an agency where technical specifications are created, how do you know that you are working from the most recent specification?
- Does your system require you to mark versions? If it is electronic, does your system automatically capture the most current version or revision?
- What if someone has access to or is working on the most recent specification (Version 3) and did not charge it out? And you were unaware that a more recent version existed, and took Version 2 as the being the last approved version?

What characteristics are lacking that you need in order to have trustworthy records?
Lesson Summary

In this lesson, you learned:

• Records need to be trustworthy and have:
  – Reliability
  – Authenticity
  – Integrity
  – Usability

• What could happen if you did not have complete and accurate records
Module 2: The 3 R’s: Requirements, Roles, and Responsibilities
Lesson 3: Ensuring Trustworthiness Using ISO 15489-1 and 36 CFR

NOTES
Lesson 4: Other Requirements

Slide 2-44

Module 2: The 3 R’s: Requirements, Roles, and Responsibilities

Lesson 4: Other Requirements
Government Statutes and Issuances That Apply to Records

Slide 2-45

Listed below are several government statutes and issuances that apply to records. Included in this list are Federal laws governing records management and laws that affect records management. Also included are other statutes and issuances that affect records management:

• Presidential Memo on Records Management
• Managing Government Records Directive – OMB NARA M-12-18
• The Presidential and Federal Records Act Amendments of 2014 (FRA)
• Government Paperwork Elimination Act (GPEA)
• Freedom of Information Act (FOIA)
• Privacy Act (PA)
• Federal Rules of Evidence (FRE)
• Office of Management and Budget (OMB) Circular A-130
• Clinger-Cohen Act
• E-Government Act of 2002
• Health Insurance Portability and Accountability Act (HIPAA)

NOTES
Managing Government Records

Presidential Memorandum on Records Management

On November 28, 2011, the President issued a memorandum to heads of Executive Departments and Agencies on managing government records. The key goals include: (1) Require electronic recordkeeping to ensure transparency, efficiency, and accountability and (2) Demonstrate compliance with Federal records management statutes and regulations.

The memo requires that all executive branch agencies make records management a senior leadership priority and devote sufficient resources to support it. It also requires that agencies report to NARA and the Office of Management and Budget (OMB) their plans for improving their records management programs, especially with regard to electronic records.
Managing Government Records Directive - OMB NARA M-12-18

The directive creates a robust records management framework that complies with statues and regulations to achieve the benefits outlined in the Presidential Memorandum. It requires that to the fullest extent possible, agencies eliminate paper and use electronic recordkeeping.


Presidential and Federal Records Act (44 U.S.C. 3301)

Slide 2-47

The directive creates a robust records management framework that complies with statues and regulations to achieve the benefits outlined in the Presidential Memorandum. It requires that to the fullest extent possible, agencies eliminate paper and use electronic recordkeeping.


Presidential and Federal Records Act (44 U.S.C. 3301)

- Strengthening the Federal Records Act by expanding the definition of Federal records
- Federal electronic records will be transferred to the National Archives
- Granting the Archivist of the United States final determination as to what constitutes a Federal record
- Early transfer of permanent electronic Federal and Presidential records to the National Archives
- Clarifying the responsibilities of Federal government officials when using non-governmental email systems

H.R. 1233 Presidential and Federal Records Act (FRA)

On November 26, 2014, President Barak Obama signed into law H.R. 1233, the Presidential and Federal Records Act Amendments of 2014. This law modernizes records management by focusing more directly on electronic records and complements our efforts to implement the President’s 2011 Memorandum Managing Government Records.

It gives the Archivist of the United States, as head of NARA, the authority to provide guidance and assistance to Federal officials on the management of records.
Key points include:

- Strengthening the Federal Records Act by expanding the definition of Federal records to clearly include electronic records
- Confirming that Federal electronic records will be transferred to the National Archives in electronic form
- Granting the Archivist of the United States final determination as to what constitutes a Federal record
- Authorizing the early transfer of permanent electronic Federal and Presidential records to the National Archives, while legal custody remains with the agency or the President
- Clarifying the responsibilities of Federal government officials when using non-government email system
The Government Paperwork Elimination Act (P.L. 105-277) addresses making government information more readily available electronically and relieving the public reporting burden by developing systems to accept electronic input, including e-signatures. E-Gov generates e-records, which is where the GPEA affects us.

Key points include:

- The GPEA requires that, when practicable, Federal agencies use electronic forms, electronic filing, and electronic signatures to conduct official business with the public.
- Agencies should provide for and accept e-signatures.
  - OMB, DOJ, and NARA have provided implementing guidance for agencies. Guidance may be found at:

NARA guidance states that e-records will be and are being created under the GPEA and that, in addition to the e-records themselves, e-records to verify other e-records are also being created.
The FOIA generally provides that any person has a right, enforceable in court, to obtain access to executive branch agency records. Some agency records (or portions of them) are protected from public disclosure by one of nine exemptions, or by one of three special law enforcement record exclusions. You will need to check with your FOIA official to determine what exemptions or exclusions may apply to release of information under FOIA.

(\text{http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm})

Key points include:

- The definition of a record under the FOIA is in some ways broader than a Federal record under the FRA. Agency records under the FOIA are (1) created or obtained by an agency and (2) under agency control at the time of the FOIA request.
• Further distinctions are made as follows: Courts distinguish “agency records” from “personal records” – maintained by agency employees but not subject to the FOIA. Determination is based on some of the following circumstances:
  – Creation: What was the intent of the creator – to create a record or a document for personal use?
  – Maintenance: How and by whom was the document maintained?
  – Use: Was it disseminated to other agency personnel for use in conducting business?
  – Was it integrated into the agency file system?
  – To what extent was it used as part of agency business?
• If a FOIA request is received in your agency, you CANNOT destroy any information in any format related to the request (e.g., an email message)
• The E-FOIA Amendments of 1996 (E-FOIA) were developed to update the FOIA and include e-records references. E-FOIA states that records must be available electronically (for records created or received after November 1, 1996). E-FOIA expands the FOIA definition of a record and states:
  – “(2) ‘[R]ecord’ and any other term used … in reference to information includes any information that would be an agency record…when maintained by an agency in any format, including an electronic format”
  – The bottom line, which changed the way the government did and does business, is this: “… (B) In making any record available to a person … an agency shall provide the record in any form or format requested by the person if the record is readily reproducible by the agency in that form or format”
  – It further states that “each agency shall make reasonable efforts to maintain its records in forms or formats that are reproducible”
• If you have any questions regarding the FOIA, contact your FOIA official. The following website contains a detailed discussion of records under the purview of FOIA: http://www.usdoj.gov/oip/foi-act.htm.
• If you are a FOIA officer, training is available via DOJ. The training usually covers both the FOIA and the PA.
Privacy Act (5 U.S.C. 552a)

The PA seeks to ensure that when the government collects personal information about people, it manages and protects that information properly.

Key points include:

- Under the PA definition, a record is “…[a]ny item, collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, his education, financial transactions, medical history, and criminal or employment history and that contains his name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph.” [See 5 U.S.C. 552a (a) (4)]
- These records need to be maintained in a secure environment
- For training, see the websites cited in the FOIA section of this lesson
- As with FOIA, if you have any questions, seek guidance from your PA officer or your Office of General Counsel

NOTES
Federal Rules of Evidence (FRE)

These rules govern Federal litigation and may also apply to documentary material not covered by the FRE. FRE (Article X), Rule 1001, provides definitions of various kinds of documentary material, including some the FRE would define as nonrecord materials.

Key points include:

- All information is essentially a record – if it exists, it is subpoenaable, even if it is a duplicate, even if it has been taken home, and even if the original record has been destroyed on schedule. If a copy exists anywhere, it is considered a record.
- Attorneys must be consulted (indeed, the request for records will usually come from an attorney’s office), because some documents are protected from release by what is called “privilege”
- Under discovery actions, NEVER release ANY data, information, documents, records, photographs, user manuals, policies, etc., without your agency attorney’s direction.

The FRE and the notes pertaining thereto can be found at [http://www.law.cornell.edu/rules/fre/rules.htm#Rule101](http://www.law.cornell.edu/rules/fre/rules.htm#Rule101).

The bottom line is, if the information exists in any form, anywhere, you have to produce it, unless your attorneys review the material and declare it “privileged.”

NOTES
Office of Management and Budget (OMB) Circular A-130

Slide 2-52

OMB Circular A-130 establishes policy for managing Federal information resources.

Key points under Information Management Policy and Information Management Planning include the following:

• Agencies must plan in an integrated manner for managing information throughout its lifecycle
• Agencies must:
  – Consider, at each stage of the information lifecycle, the effects of decisions and actions on other stages of the lifecycle, particularly those concerning information dissemination
  – Train personnel in skills appropriate to managing information
  – Protect government information aligned with the risk and magnitude of harm that could result from the loss, misuse, or unauthorized access to information
  – Record, preserve, and make accessible sufficient information to ensure the management and accountability of agency programs and to protect the legal and financial rights of the Federal Government
  – Incorporate records management and archival functions into the design, development, and implementation of information systems

OMB Circular A-130 may be found at http://www.whitehouse.gov/omb/circulars/a130/a130.html and http://www.whitehouse.gov/omb/circulars/a130/a130trans4.html.
Clinger-Cohen Act (40 U.S.C. 1401)

This Act requires that agency information technology (IT) investments be based on cost-benefit analysis of business needs.

Key points include the following:

- A disciplined analysis of recordkeeping requirements can help identify the benefits associated with specific IT investments
- Mission-supporting electronic information systems should include a cost-benefit study on the inclusion of electronic recordkeeping functions to manage the electronic records created by such systems

The Clinger-Cohen Act may be found at http://government-programs.laws.com/clinger-cohen-act.

The E-Government Act of 2002 identifies several government-wide initiatives to integrate agency operations and IT investments. Its goals are to eliminate redundant systems and to improve the government’s quality of customer service.

Health Insurance Portability and Accountability Act (P.L. 104-191)

This legislation addresses the protection of private medical information. This law is applicable to those who work with individual medical information, including insurance carriers participating in the Federal Employees Health Benefits Program, TRICARE for the military, Department of Veterans Administration medical files, and Health and Human Services.

Briefly, the HIPAA privacy rule states that a covered entity may not use or disclose protected health information unless the individual agrees to the use or disclosure, or the HIPAA regulations specifically require or permit the use or disclosure.

HIPAA may be found at [http://aspe.hhs.gov/admnsimp/pl104191.htm](http://aspe.hhs.gov/admnsimp/pl104191.htm).
Lesson Summary

In this lesson, you learned:

• About government statutes and issuances
• The application of statutes and issuances to the ways in which records are managed, maintained, made available, and disposed of
• The key points of the statutes and issuances
• That none of the statutes or issuances change the definition of a record, but they do influence how we must manage records and nonrecord materials
When developing requirements and an overall records management program, it is necessary to work with staff outside of your unit. The ARO needs an understanding of business functions and processes within an agency. This may seem like a huge endeavor, but it is necessary to learn where records are created, how they are maintained, and how long they are needed. AROs need to know the business owners and processes within your agency.
Who Is Responsible?

As agencies assign different responsibilities to some of the roles presented in this lesson, we will take time to figure out some key responsibilities of the general roles.

(Refer to Handout 2.06 – Recordkeeping Roles and Responsibilities, located in the Handouts section of your PG, to review a list of roles and responsibilities.)
IT and Records Management Working Together

From Bruce Dearstyne, Ph.D., contributor to *The Information Management Journal*:

“Information technology is essential to modern organizations. CEOs and other executives, however, often focus on information technology rather than on the value and usefulness of the information itself.”

IT is focused on technology, and thus IT staff have a different structure of laws, regulations, and views of information that they need to follow to do their jobs.

IT staff are typically the mechanics of information systems; they are not tasked with ensuring compliance and adherence to regulations.

However, IT staff needs to work with records management staff to understand that there is an additional layer of laws, regulations, policies, and procedures that may affect the information they manage.

In turn, records management staff needs to understand not only differences in terms, but also the statutes that govern IT management and the implications of these laws.

NOTES
Staff need to understand how technologies affect electronic records, such as hardware- and software-dependent records.

Records management staff also need to know that they are key players in teaching the value and usefulness of information to IT.

Ultimately, IT and records management staff need to understand that records management requires a level of technology comprehension beyond document tracking, which requires the expertise of both staffs.
Activity: Watch Your Lingo

Slide 2-59
**Watch Your Lingo Worksheet**

Read the terms and definitions below and determine whether they come from the disciplines of records management (RM) or information technology (IT) or Both.

**Table 2-4: Watch Your Lingo Worksheet**

**Archive** *(verb)*

<table>
<thead>
<tr>
<th>DEFINITION</th>
<th>ACRONYM</th>
<th>RM</th>
<th>IT</th>
<th>BOTH</th>
</tr>
</thead>
<tbody>
<tr>
<td>To store data offline</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>To back up</td>
<td></td>
<td></td>
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<tr>
<td>To transfer records from the office of creation to a repository authorized to appraise, preserve, and provide access to those records</td>
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<td></td>
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</tr>
<tr>
<td>To copy files to a long-term storage medium</td>
<td></td>
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</tbody>
</table>

**Archives** *(noun)*

<table>
<thead>
<tr>
<th>DEFINITION</th>
<th>ACRONYM</th>
<th>RM</th>
<th>IT</th>
<th>BOTH</th>
</tr>
</thead>
<tbody>
<tr>
<td>A collection of non-current records of an organization or institution preserved because of their continuing historical value</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Data stored offline</td>
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<td></td>
</tr>
<tr>
<td>Backup media</td>
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<td></td>
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<tr>
<td>An accumulation of series or other record items with a common provenance, or of a distinct organization, body, or purpose</td>
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</tr>
<tr>
<td>A collection of computer files that have been packaged together for backup, to transport to some other location, or for saving away from the computer so that more hard disk storage can be made available</td>
<td></td>
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<tr>
<td>The whole body or group of records of continuing value of an agency or individual</td>
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</tbody>
</table>
### Document (noun)

<table>
<thead>
<tr>
<th>Definition</th>
<th>ACRONYM</th>
<th>RM</th>
<th>IT</th>
<th>BOTH</th>
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</thead>
<tbody>
<tr>
<td>A written or printed work</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Information or data fixed in some media</td>
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<tr>
<td>A digital file in a particular format</td>
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</table>

### File (noun)

<table>
<thead>
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<th>Definition</th>
<th>ACRONYM</th>
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<th>BOTH</th>
</tr>
</thead>
<tbody>
<tr>
<td>A collection of data stored for use by a computer</td>
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<tr>
<td>A group of documents related by use or topic, typically housed in a folder</td>
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<tr>
<td>Documents organized in a collection for safekeeping and future reference</td>
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<tr>
<td>A set of records</td>
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<tr>
<td>An entity of data available to system users that is capable of being manipulated as an entity (for example, moved from one directory to another)</td>
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### Metadata

<table>
<thead>
<tr>
<th>Definition</th>
<th>ACRONYM</th>
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<th>IT</th>
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<tbody>
<tr>
<td>A data dictionary</td>
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<tr>
<td>Catalog data structured according to MARC, EAD, Dublin Core, or other descriptive standard</td>
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<tr>
<td>The documentation of data architecture, properties, and methods necessary to store, retrieve, and use data in a meaningful manner</td>
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### Record (noun)

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<tr>
<th>Definition</th>
<th>ACRONYM</th>
<th>RM</th>
<th>IT</th>
<th>BOTH</th>
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<tbody>
<tr>
<td>A unit of data that is transmitted from sender to receiver</td>
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<tr>
<td>A written or printed work of a legal or official nature that may be used as evidence or proof</td>
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<tr>
<td>A collection of related data elements treated as a unit, such as the fields in a row in a database table</td>
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<tr>
<td><strong>DEFINITION</strong></td>
<td><strong>ACRONYM</strong></td>
<td><strong>RM</strong></td>
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<tr>
<td>--------------------------------------------------------------------------------</td>
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<tr>
<td>Information in a fixed form that is created or received in the course of individual or institutional activity</td>
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<tr>
<td>Information preserved as evidence of an activity or decision</td>
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</tr>
<tr>
<td>A collection of data items arranged for processing by a program. Multiple records are contained in a file or data set</td>
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</tr>
<tr>
<td>A row or group of fields within a table that is relevant to a specific entity</td>
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</tbody>
</table>
Lesson Summary

In this lesson, you learned:

- That many different roles and responsibilities are involved in recordkeeping
- That IT and records management may use the same terminology, but with dramatically different meanings
- That it is important for IT and records management to work together for effective records management
Module 2 Review and Wrap-Up

Slide 2-60
Activity: Review

Slide 2-61

Activity

Review

NOTES
Activity: Review

Scenarios:
1. The Office of the Administrator has decided it needs to upgrade its system to track agency correspondence between its office and the Secretary of the Environment, manage the Director’s calendar, manage policy, etc. The Office wants this system to be internal and not available on the web.
2. The Office of Public Affairs, in its usual zeal to get word to the public, developed a new web-based system. This system posts all its informational products and responses to congressional inquiries based on constituent letters. It also receives and tracks comments from the public on virtually every subject area concerning BPR. You found out about it by looking for something else on Public Affairs’ webpage.
3. One of your friends in the Assistant Administrator for Resources Evaluation, Research, and Policy Resources, Research Staff drops by to show you his “really neat” new BlackBerry. He can now download and upload files and work on them while commuting on the train. He can also send and receive documents from others in his office. He can store information on the variety of contractors they work with, all his phone numbers, kids’ birthdays, etc. He’s really excited because all the researchers in the department now have BlackBerry smartphones, and they can all communicate with each other, agency partners, contractors, private research firms, etc.
4. The Assistant Administrator for Administration and Chief Information Officer (CIO) asked you to develop a system where the Bureau can put its records. He suggested just scanning them all and then getting rid of the paper. He would like you to come up with a proposal by the end of the week. And oh, by the way, he said to “keep it simple.”
5. A congressional committee decided that the number of BPR field offices in the West should mirror the number in the East. The East (east of the Mississippi) has five offices, the West, 10. Therefore, regional boundaries are redrawn and offices must relocate, merge, and/or close. This will affect the Assistant Administrator for Recreation and the two sub-offices most drastically.
Review Worksheet

For the scenario assigned to you, identify how you would approach the recordkeeping challenge by identifying who should be involved and consulted to devise a solution, and what they would do to help implement the solution.

Scenario Number: _________

**Table 2-6: Module 2 Review Worksheet**

<table>
<thead>
<tr>
<th>ROLE (WHO IS INVOLVED?)</th>
<th>RESPONSIBILITY (WHAT WILL THEY DO?)</th>
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<tbody>
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</tbody>
</table>
Module Review

In Module 2, you learned:

- That recordkeeping requirements are vital to organizing, maintaining, and retrieving information
- That every Federal agency creates a great number of records in a variety of media, and the quality of these records varies from agency to agency and program to program
- That recordkeeping requirements are the means to implement “adequate and proper documentation”
- That OMB mandates that recordkeeping requirements be built into information systems
- That each agency must consider the intent or circumstances of creation or receipt of the materials to determine whether systematic maintenance is required
- The levels of recordkeeping requirements
Module 2: The 3 R’s: Requirements, Roles, and Responsibilities
Module 2 Review and Wrap-Up

• General requirements of records
• That records need to be trustworthy and have:
  – Reliability
  – Authenticity
  – Integrity
  – Usability
• What could happen if you did not have complete and accurate records
• About government statutes and issuances
• That none of the statutes or issuances change the definition of a record, but they do affect how we must manage records and nonrecord materials
• That there are many different roles and responsibilities involved in recordkeeping
• That it is important for IT and records management to work together for effective records management

NOTES

________________________________________________________________________________________

________________________________________________________________________________________

________________________________________________________________________________________

________________________________________________________________________________________

Knowledge Area 2: Creating and Maintaining Agency Business Information
January 2017
Reflect upon what you have learned in Module 2 and how you will apply it to your job.
### Module 2 - Action Items Worksheet

<table>
<thead>
<tr>
<th>What did I learn about recordkeeping requirements, roles, and responsibilities that will help me at my job?</th>
</tr>
</thead>
<tbody>
<tr>
<td>List at least one thing you learned about recordkeeping requirements, roles, and responsibilities that is relevant to your job role and responsibilities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>How will I apply what I learned about recordkeeping requirements, roles, and responsibilities to my job?</th>
</tr>
</thead>
<tbody>
<tr>
<td>List at least one thing you learned about recordkeeping requirements, roles, and responsibilities that you will apply to your job, and explain how you will apply it.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What “aha!” moments did I have during this module?</th>
</tr>
</thead>
<tbody>
<tr>
<td>List any “aha” moments you experienced during this module.</td>
</tr>
<tr>
<td>(“The government statutes and issuances that apply to records impact the management of records and nonrecord materials?!? Aha!”)</td>
</tr>
</tbody>
</table>

Knowledge Area 2: Creating and Maintaining Agency Business Information

January 2017
# Module 3: Records Inventory and File Plan

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Introduction and Objectives

Overview

This module introduces the key steps for gathering information about your records and also forms the foundation for various components within a records management program.
Module 3 Learning Objectives

At the conclusion of this module, you will be able to:

• Define how an inventory fits into the overall records management program
• Define the key factors in establishing an inventory
• Identify the key elements of information to be captured
• Determine how to collect the information
• Establish a process for inventory verification and analysis of inventory results

At the conclusion of this module, you will be able to:

• Define how an inventory fits into the overall records management program
• Define the key factors in establishing an inventory
• Identify the key elements of information to be captured
• Determine how to collect the information
• Establish a process for inventory verification and analysis of inventory results
Module 3: Records Inventory and File Plan

Introduction and Objectives

Module 3 Learning Objectives (cont’d.)

• Define a file plan and its basic purpose
• Identify the six steps in developing a file plan

• Define a file plan and its basic purpose
• Identify the six steps in developing a file plan

NOTES
Inventory Introduction

Module 3: Records Inventory and File Plan

Inventory Introduction
NOTES
Lesson 1: What is an Inventory?
What is a Records Inventory?

A records inventory is a complete and accurate survey of an agency’s business information that documents the function, flow, and description of records.

A **records inventory** is a complete and accurate survey of an agency’s business information that documents the function, flow, and description of records.
Purpose of a Records Inventory

• The main purpose of a records inventory is to provide the information needed to schedule records
• A records inventory tells you:
  – What records an agency creates
  – Who within the agency “owns” the records
  – Where the records are located
  – The volume and arrangement of the records

The basic reason for a records inventory is identifying what you have, and what to do with it. A records inventory mainly provides information needed to develop record schedules, but it can also help identify various records management problems.

A records inventory tells you:
• What records an agency creates
• Who within the agency “owns” the records
• Where the records are located
• The volume and arrangement of the records
Why Conduct a Records Inventory?

There are four reasons to conduct a records inventory:

- To identify the record series or systems
  - Exactly what types of records exist in a program or office?
  - Are nonrecord materials clearly identified and filed separately in the files?
  - Do multiple copies of the information exist in various locations?
- To identify the quantities and dates of your records
  - What is the volume of paper and electronic files and their exact locations?
  - What are the date spans of the records and files under review?
• To identify the location of your records
  – Individual computers and workstations
  – File centers
  – Storage rooms
  – Records centers
  – Servers and repositories
  – Data warehouses
• To identify problem areas and places for improvement
  – Inadequate documentation of official actions
  – Improper application of a records schedule, or identification of unscheduled records
  – Deficient paper and electronic recordkeeping systems
  – Poor management of nonrecord materials and personal papers
  – Inadequate records security practices
  – Insufficient identification of vital records, also known as essential records management
Benefits of a Records Inventory

In the process of identifying and collecting information on an agency’s business, the records inventory becomes the working document for preparing:

- A files management program, because it shows the types of records you have (paper, electronic, special media) and helps determine the best way to arrange, file, and maintain the records
- A file plan, because it shows where the agency’s files are located, both physically and organizationally, and serves as a tool when implementing an electronic records management system
- A records retention schedule, because the information collected should show the purpose and use of the records to help determine the length of time the information is needed to support the business process
- A vital records program (Essential Records Management), because it indicates whether records are original or duplicates, and therefore shows alternate sources of information
Additional benefits of a records inventory can include the collection of statistical data to help determine the most efficient and cost-effective maintenance of the records. For example, specific costs can be identified for on- and off-site storage, filing equipment, floor space, electronic scanning, and computer server storage requirements.

A records inventory can also point to potential records management problems, such as inadequate documentation of official actions, poor management of nonrecord materials, inconsistent filing practices, and inadequate records security practices.
Legal and Regulatory Sources

The following legal and regulatory sources provide the foundation for information collection for records inventory and scheduling:

- **Law**
  - Establishment of a program (44 U.S.C. 3102)
  - Records disposal, procedures, and standards for reproduction (44 U.S.C. 3302)

- **Regulations**
  - Identify, develop, issue, and review recordkeeping requirements for all operations and records (36 CFR 1222 Subpart B)
  - Records maintenance program to identify and preserve complete records (36 CFR 1222.34)
NARA Information and Other Resources

Slide 3-16

• Resources and References
  – “NARA’s Knowledge Area (KA) 3 – Records Scheduling
Lesson Summary

In this lesson, you learned:

• That a **records inventory** is a complete and accurate survey of an agency’s business information that documents the function, flow, and description of records
• Inventory Legal, Regulatory and Training Sources
• The purpose of a records inventory
• The benefits of a records inventory
• The legal and regulatory sources that provide the foundation for information collection for records inventory
• The location of National Archives and Records Administration (NARA) information and other resources
Lesson 2: Key Steps in Planning an Inventory
The key factors of a records inventory include:

- Defining the inventory goals
- Deciding on the focus or scope
- Obtaining management approval

These become the first steps when starting a records inventory.
Goals

An inventory is conducted to establish key components of your records management program, such as developing a records schedule, establishing proper maintenance of records, and developing a file plan.

A records inventory can include collecting data to help in cost-benefit analyses or to point to potential records management problems.

The overall purpose or goal of your inventory should be defined before establishing the scope, or obtaining management approval.
Identify what program area(s) your inventory will cover.

It is important to define the scope clearly to ensure that you know what you are inventorying. In addition, the scope will assist in determining what records are addressed, where the records are located, and what records are a priority.

For example, the inventory process may begin with current records in an office space, with a concentration on the program records maintained in the space. Records stored off-site, such as those stored at records centers, must be considered when determining the scope of an inventory.

When completed, an inventory includes all offices within the scope, and records in all media within the scope (including paper, electronic, audiovisual, microforms, and all nonrecord materials).
Management Approval

It is important to obtain management approval for the entire inventory process. When obtaining commitment from top management, ask for written commitment that shows management support and project direction and authorizes records staff (or consultants) to proceed. A directive should also be issued that states the objective and asks for the cooperation of staff.

Develop a plan for collecting the inventory information and present it to management for review, feedback, and approval. Be sure to state the business objectives the agency will achieve. These objectives are usually economic or legal – for example, gaining savings in storage costs by reducing the volume of records, and reducing legal vulnerabilities by enforcing proper security procedures.
Focus of Inventory

The inventory focus addresses five basic questions about your business processes:

• **Who** is currently creating, receiving, and maintaining business information?
• **What** is currently being kept to support these processes?
• **Where** are the records stored and maintained?
• **How** are the records stored and maintained?
• **Why** are certain records stored and maintained?

(Refer to **Handout 3.01** – Sample Memo Requesting a Records Inventory, located in the Handouts section of your Participant Guide [PG], for a sample memo that can be used to gain management support. Refer to **Handout 3.02** – Sample Management Approval Introduction Letter for Records Inventories, located in the Handouts section of your PG, for sample letter informing agency staff about an inventory and requesting their cooperation.)
Lesson Summary

In this lesson, you learned:

- That the key factors of a records inventory include:
  - Defining the inventory goals
  - Deciding on the goal, focus, and scope
  - Obtaining management approval
- That the focus of the inventory addresses five basic questions: who, what, where, how, and why
Lesson 3: The Steps in Inventorying Records

Slide 3-23

NOTES
Steps in Inventorying Records

The following is a list of the additional steps involved in conducting the inventory:

1. Decide on the information to be collected
2. Decide how the information will be collected
3. Identify and prepare appropriate inventory form(s)
4. Decide who will conduct the inventory, and train them if necessary
5. Learn where the agency’s files are located, both physically and organizationally
   (Previously discussed in Lesson 1)
6. Conduct the inventory
7. Verify and analyze the results

(Refer to Handout 3.07 –Steps in a File Plan)
Decide How the Information Will Be Collected

Choose methods that will provide expediency and efficiency. There are three ways to collect information for a records inventory:

- Questionnaire
- Interview
- Physical site survey

These three methods of collecting information are not mutually exclusive and can be used in combination as necessary.
Prepare an Inventory Form

The following are some tools that can be used to capture inventory information:

• Series Inventory Form
• Audiovisual Records Form
• Information System Description Form

(Refer to Handout 3.03 – Series Inventory Form, Handout 3.04 – Audiovisual Records Series Inventory Form, and Handout 3.05 – Information System Description Form, located in the Handouts section of your PG, for sample inventory forms.)
Inventory Database

NOTES
Decide Who Will Conduct the Inventory

Slide 3-28

Normally, Agency Records Officers or experienced staff members perform the records inventory. Should additional personnel be needed, they will need to be trained. In many cases, the agency has existing descriptions and collections of information.

Normally, it is better for the Agency Records Officer (ARO) or experienced staff members to perform the records inventory, because they understand the project’s purpose. However, when speed is essential, or when the volume of records is unusually large, other agency (departmental) personnel, or contractors, may be tasked to do the job.

After your agency establishes who will do the work, the individuals need to be trained to conduct the inventory properly.

Who else is involved? In many cases, the agency has existing descriptions and collections of information that can help support the inventory process, this is especially true of agency information systems.
Look within the agency, including the website, for various resources to provide information about the records, business processes, series, and systems:

- On-site records storage facility personnel
- The Chief Information Officer (CIO)
- The Privacy Act coordinator
- The Freedom of Information Act (FOIA) coordinator
- The public information officer
- The agency librarian
- The agency historian
- Program officers
- The agency security officer
- Information technology (IT) staff
- Contracting officer
- Contractors
- Legal counsel

Take advantage of these resources to create the baseline of your information collection.

After you have collected information from these sources, be sure to validate it as you conduct the inventory.

As information is collected, records management issues may come to light:

- Improper applications of recordkeeping technology
- Inadequate records security practices
- Deficient filing systems and maintenance practices
  - Ensure that these potential concerns are captured
Learn Where the Agency’s Records Are Located

Because you need to view the agency’s records to inventory them, you will first need to locate the records. To locate the agency’s records, review the agency’s business functions and recordkeeping requirements.
Review Agency’s Business Functions

Understanding an agency’s business functions can tell you where its records are located. Review the agency’s functions as reflected in its structure, levels of authority, and program responsibilities:

- Examine pertinent documents such as laws, regulations, organization charts, and functional statements
- Consult with program managers, IT managers, and records personnel
- Seek answers to these questions:
  - Where are the key line and staff offices?
  - What programs does the agency have?
  - What units are responsible for developing policy?
  - What is the nature of unit activities (legal, fiscal and budgetary, inspection, general management, and administrative services)?
Review Agency’s Recordkeeping Requirements

Understanding an agency’s recordkeeping requirements can also tell you where records are located.

- Review the agency’s recordkeeping requirements, including those for the entire agency’s paper and textual, electronic, audiovisual, cartographic, architectural, and microform records
- Identify policy and procedures on related records and information matters, such as vital (essential records management) records, adequacy of documentation, personal papers of officials, and Privacy Act and FOIA concerns
Verify and Analyze the Results

Once the inventory is complete, the ARO needs to assess the quality of the inventory’s results. 
- If the records are nonelectronic, the results should be spot-checked for obvious errors, such as:
  - Failing to indicate the location of the records inventoried
  - Exaggerating their volume
  - Intermixing two or more potentially permanent series, or two or more temporary series having potentially varying retention periods
- If someone else prepared the inventory form, the ARO needs to examine some of the inventoried records to confirm the accuracy of the information on the form
- For electronic records, remember that the information system form requires more information on the system description, program ownership, and operations
- The ARO needs to review the information system inventory form with appropriate staff for accuracy and, if needed, request sample print-outs to support the key description elements on the form
- The ARO needs to verify and, if necessary, re-inventory the records when random checks reveal serious issues with the quality of the data on the inventory form or the inventory process

NOTES
As information is collected, records management issues might come to light:

- Improper applications of recordkeeping technology
- Inadequate records security practices
- Deficient filing systems and maintenance practices

Ensure that these potential issues are captured.

The results of the inventory can be used to determine mismanagement of your records.

Poor records management can result in the following problems for the program, for the agency, for the government, and for the citizens:

- Rights of citizens and government placed in jeopardy
- Loss of records that have historical value to the government and the public
- Legal ramifications, including lawsuits and inability to prove the agency’s case
- Business ramifications – Are business processes being documented? Can records be found when needed? Are rules being followed?
- Proper creation, maintenance, and schedule implementation directly mitigate risk
- Proper recordkeeping should ensure:
  - Reliability
  - Integrity
  - Usability
  - Authenticity of the records

Once you have seen flaws in your agency’s recordkeeping, you should conduct a risk assessment to determine what would happen to the agency and its programs if certain records were not accessible because of mismanagement. The risk assessment will help determine:

- How important specific records are to the agency business needs
- How the agency’s business or mission is influenced if specific records are lost or mishandled
Activity: Verifying and Analyzing Inventory Results

Slide 3-31

Activity

Verifying and Analyzing Inventory Results
Verifying and Analyzing Inventory Results Worksheet

Answer the following questions for the flawed inventory form assigned to you.

Flawed Series Inventory Form #:_____

1. Assess the quality of the inventory. In your opinion, is the quality of the inventory form excellent, fair, or terrible? Why?


3. List the inconsistencies.

4. List the potential problems that can result from this flawed inventory.
Now What?

After the inventory is verified, the next steps are to determine the best way to maintain and arrange the records and to develop a file plan.

• Once you have seen flaws in your agency’s recordkeeping, you should conduct a risk assessment.
• The results of the inventory can also be used to determine mismanagement of your records.

After the inventory is verified, the next steps are to determine the best way to maintain and arrange the records and to develop a file plan.
Lesson Summary

In this lesson, you learned:

- The steps in inventorying records
- How to decide how information will be collected
- How to prepare an inventory form
- How to decide who will conduct the inventory
- Where your agency records are located
- How to review agency recordkeeping requirements
- How to verify and analyze inventory results
A **file plan** is a listing in outline form of the main file headings and subdivision headings for each record series.

A file plan can be as comprehensive or as streamlined as necessary to meet your business needs. Traditionally, when we think of a file plan, we think of something relating to paper records – how they are arranged, maintained, and filed. But file plans can actually address all of your office information, including word-processing documents, scanned images, email, databases, web records, special media records, and entire electronic information systems.
A file plan consists of the following:

- A document that contains identifying numbers, titles, or descriptions, and disposition authorities of all files held in an office; it can link dispositions in the file plan to schedules to permit automatic updates
- Up-to-date and accurate disposition authorities and retention periods for all paper, electronic, and special media records
- The location of all records in an office, including paper, electronic, and special media records
- Indication of how records – paper, electronic, and special media – are to be arranged in an office
- Instructions on the identification and maintenance of nonrecord materials
Why Have a File Plan?

A file plan is used as an organizing tool. It is not enough to put documents into folders and then put them into a file cabinet or file them randomly on an individual’s personal computer. There should be some organization to the filing – and a file plan assists in meeting this objective.

A file plan offers many benefits:

- Easier filing
- Consistent records practices
- Quick reference to records dispositions
- Records and nonrecord materials captured apply only to your office
- A key tool when implementing an electronic records management system (also known as a Records Management Application – RMA)
- File arrangement by subject or chronological, numerical, or geographical categories, or combinations of these categories
- Effectiveness, efficiency, and overall improvement of a records program
Steps in Developing a File Plan

Many people think a file plan is simply a listing of current file folders in their file cabinets or list of electronic folders on their computer. However, a file plan includes much more information and is an important component of an overall records management program. In a records management program, the records maintenance, the records inventory, the records file plan, and the records schedule all work together to effectively and efficiently maintain business information.

Steps in developing a file plan include the following:

1. Identify record series or systems maintained in your office
2. Identify disposition authority and retention for each series or system
3. Construct the file plan
4. Maintain a copy in an electronic format so that you can incorporate changes suggested during review
5. Obtain management review and approval of the file plan, and distribute it
6. Review and update the file plan

NOTES
Equipment

Now that media have evolved, so have the tools and equipment required to hold files and store information. Equipment needs to be selected based on compatibility with records, ease of access, room for growth, cost, space requirements, simultaneous use, security, and long-range planning.

To provide the most efficient information retrieval at the lowest possible cost, in the quickest manner, and using the least amount of office space, one must consider the proper equipment for filing. Paper was the traditional records medium, and therefore equipment was designed to hold paper documents, mainly correspondence and index cards. However, now that media have evolved, so have the tools and equipment required to hold files and store information.

Equipment needs to be selected based on compatibility with records, ease of access, room for growth, cost, space requirements, simultaneous use, security, and long-range planning. Considerations include looking at the present filing system, the use of the records, conversion to future systems, employee comfort, and the technical aspects of equipment.

Even with the constant expansion of electronic records residing on computers and servers, a large amount of information on paper and special media records still require management.

For this discussion refer to **Handout 3.08** – Filing Equipment.
Lesson Summary

In this lesson, you learned:

• What a file plan is
• Why to have a file plan
• How to develop a file plan
  – The six steps in developing a file plan
Module 3 Review and Wrap-Up

Slide 3-38

NOTES
Module Review

In Module 3, you learned:

- That a records inventory is a complete and accurate survey of an agency’s business information that documents the function, flow, and description of records
- The purpose of a records inventory
- Why a records inventory is conducted
- The benefits of a records inventory
- Legal and regulatory sources
- NARA information and other resources and references
- The key factors of a records inventory
- That the focus of the inventory should be on answering five basic questions: who, what, where, how, and why
• To determine where the records are located by reviewing agency business functions and recordkeeping requirements
• The steps involved in conducting an inventory
• What information should be collected
• The three primary methods to perform a records inventory
• Several tools for capturing inventory information
• Who collects the information
• That once the records have been inventoried, the ARO needs to verify the results
• That after the inventory is verified, the next steps are to determine the best way to maintain and arrange the records and to develop a file plan
• That results of an inventory can be used to determine mismanagement of records, which can result in problems for the program, agency, government, and for citizens
• What a file plan is and its basic purpose
• How to use six steps to develop a file plan
Applying What You Learned

Reflect upon what you have learned in Module 3 and how you will apply it to your job.
### Module 3 - Action Items Worksheet

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What did I learn about records inventory that will help me at my job?</strong></td>
<td>List at least one thing you learned about records inventory that is relevant to your job role and responsibilities.</td>
</tr>
<tr>
<td><strong>How will I apply what I learned about records inventory to my job?</strong></td>
<td>List at least one thing you learned about records inventory that you will apply to your job, and explain how you will apply it.</td>
</tr>
<tr>
<td><strong>What “aha!” moments did I have during this module?</strong></td>
<td>(“Your agency has existing descriptions and collections of information that can help support the inventory process?!? Aha!”)</td>
</tr>
</tbody>
</table>
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Knowledge Area 2: Creating and Maintaining Agency Business Information

Module 4: Information Maintenance and Organization
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Lesson 3: Tools for Maintaining Your Records

Electronic Recordkeeping Systems

Electronic Recordkeeping Systems vs. Electronic Information Systems

Electronic Records Management Systems vs. Electronic Information Systems

The Big Picture: Records Management, ERK, and ERM

Benefits of an ERMS or Records Management Application (RMA)

Additional Benefits of ERMS or RMA

Potential Drawbacks of ERMS

Electronic Records Management Systems vs. Electronic Recordkeeping Systems vs. Electronic Information Systems

Electronic Case Filing and Case Management Systems

Electronic Document Management Systems

Integrating Electronic Document Management Systems and Electronic Records Management Systems

Three Types of Integration

Lesson Summary

Module 4 Review and Wrap-Up

Activity: Review of Records Maintenance

Review of Records Maintenance Worksheet

Module Review

Applying What You Learned

Module 4 – Action Items Worksheet
Introduction and Objectives

Overview

This module provides guidelines for creating and maintaining records specific to your agency’s program, functions, record series, and systems.
At the conclusion of this module, you will be able to:

- Define a recordkeeping system
- Determine basic principles of files management
- Identify criteria for maintaining records in all formats
- Identify the benefits and issues related to paper and electronic records systems
- Explain the tools used to maintain records
Lesson 1: What is a Recordkeeping System?

Slide 4-3

NOTES
What is a Recordkeeping System?

A recordkeeping system is a manual or electronic system that captures, organizes, and categorizes records to facilitate their preservation, retrieval, use, and disposition (36 CFR 1220.18).
Elements of Recordkeeping

Maintaining records consists of the following elements in a recordkeeping system:

- Capture or create
- Use, disseminate, or display
- Store
- Preserve

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THE NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

Capture/Create

Use/Disseminate/Display

Store

Preserve

Information Process

NOTES
Elements of Recordkeeping Worksheet

- Capture/Create
- Use/Disseminate/Display
- Store
- Preserve

Information Process
**Why We Manage Records**

**Slide 4-7**

**Why We Manage Records**

- **Records management** is the planning, controlling, directing, organizing, training, promoting, and other managerial activities related to the creation, maintenance and use, and disposition of records

- The primary purpose of records management is to allow people to find and use information

**Records management** is the planning, controlling, directing, organizing, training, promoting, and other managerial activities related to the creation, maintenance and use, and disposition of records to achieve adequate and proper documentation of Federal policies and transactions and ensure effective and economical management of agency operations.

The primary purpose of records management is to allow people to find and use information (records).

Records maintenance is a subset of records management.
Records maintenance is any action involving the storage, retrieval, and handling of records kept in offices by or for a Federal agency. This is the second stage of the records lifecycle.

36 CFR 1222.34 requires that agencies develop records maintenance programs:

Agencies must 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, are segregable.

**Purpose of Records Maintenance**

The purpose of records maintenance is to organize and maintain your records to facilitate use.
Activity: Benefits and Potential Problems of Records Maintenance

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Activity

Benefits and Potential Problems of Records Maintenance

Slide 4-15

Activity: Benefits and Potential Problems of Records Maintenance

• What are the benefits associated with good records maintenance?
• What are the problems associated with poor records maintenance?

NOTES
Benefits of Good Records Maintenance

Benefits of good records maintenance include the following:

- Records are trustworthy
- Records can be found when needed
- Permanent records are easy to identify and retain
- Permanent, temporary, personal papers, and nonrecord materials are separated
- Continuity is provided in the event of a disaster
- Records systems support business processes
- Saves cost, space, and resources
Benefits of Good Records Maintenance (cont'd.)

- Records are stored in proper media
- Records are available long enough to protect rights, ensure accountability, and document the national experience
- Temporary records are properly destroyed
- Agency reputation and credibility are enhanced
- Customer service and satisfaction are enhanced
- Productivity is enhanced

- Records are stored in proper media
- Records are available long enough to protect rights, ensure accountability, and document the national experience
- Temporary records are properly destroyed
- Agency reputation and credibility are enhanced
- Customer service and satisfaction are enhanced
- Productivity is enhanced
**Benefits and ISO 15489-1**

ISO 15489-1 Information and Documentation – Records Management, Part 1: General, also addresses the benefits in these key points:

- Business is conducted in an orderly, efficient, and accountable manner (ISO 15489-1 Information and Documentation – Records Management, Part 1: General 4, Benefits of Records Management)

- Continuity is provided in the event of a disaster (ISO 15489-1 Information and Documentation – Records Management, Part 1: General 4, Benefits of Records Management)

- Records systems support and do not hinder business processes (ISO 15489-1 Information and Documentation – Records Management, Part 1: General 8.4.f, Design and Implementation Methodology)

- Records are stored in proper media that ensure their usability, reliability, authenticity, and preservation (ISO 15489-1 Information and Documentation – Records Management, Part 1: General 9.6, Storage and Handling)
Potential Problems of Poor Records Maintenance

Potential problems of poor records maintenance include an agency’s:

- Failure to perform its most basic functions
- Failure to respond to special requests, such as Freedom of Information Act (FOIA), litigation, discovery, and Congressional inquiries
- Inability to recover, or delay in recovery, from a disaster due to the destruction of important records
Potential Problems of Records Poor Maintenance (cont’d.)

- Exposure to legal and administrative penalties for improper destruction
- Suffering consequences of disclosure of confidential records to unauthorized individuals
- Loss of historical and program information
- Ineffective operation at various program levels

- Exposure to legal and administrative penalties for improper destruction
- Suffering consequences of disclosure of confidential records to unauthorized individuals
- Loss of historical and program information
- Ineffective operation at various program levels
Requirements for Information and Records Maintenance Programs

Furnish accurate, timely, and complete information
Process information as efficiently as possible
Provide information at the lowest possible cost
Provide maximum service to the user
Dispose of records when no longer needed

Information and records maintenance programs should:

- Furnish accurate, timely, and complete information
- Process information as efficiently as possible
- Provide information at the lowest possible cost
- Provide maximum service to the user
- Dispose of records when no longer needed
Records Maintenance - Next Steps

After conducting a records inventory, the next step in records maintenance is to get your files organized. The records should be organized into file types, series, and systems for ease of maintenance and disposition.

In order to organize your files, consider the following:

- There are many different file types: examples include case files, correspondence files (subject files), and technical reference files.
- Record series (also called file series) are file units arranged according to a filing system or a particular subject or function. Examples include contracts, travel vouchers, official personnel files, and grant case files.
- Systems are electronic record series that are separate, discrete bodies of computer data (examples include text files, data files, or image files) that are maintained within a computer or application.
- Records should be kept in support of and reflect a business process or function.

NOTES
Managing Categories of Records

Slide 4-22

In most offices:
• 25 percent of records are active program records
• 75 percent of records are:
  – Administrative records
  – Inactive program records
  – Working files
  – Reference materials
Where are you spending all your effort?

In most offices, only about 25 percent of the records are active program records. That means that 75 percent of the information we encounter falls into one of the following categories:

• Administrative records used to carry out routine operations
• Inactive program records that can be stored off-site
• Working files used by staff to carry out their assigned duties
• Reference materials

The importance of knowing this percentage is understanding the level of detail needed to manage each category and understanding how improving processes can eliminate ineffective use of resources to manage 75 percent of your information.

Some suggestions for improving records management can be found in Handout 4.01 – Suggestions for Improving Records Management.
Maintenance Questions

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- Have agency standards and procedures for classifying, indexing, filing, and retrieving records in all media been established?
- Is access to all records, regardless of media, limited to authorized personnel?
- Are cutoffs clearly defined and implemented for each record series, systems, and electronic files?
- Are permanent series and systems of records identified and maintained separately from temporary records?

NOTES
Maintenance Questions (cont’d.)

- Has the agency established and implemented regulations or procedures for the storage of security classified, Privacy Act, and other restricted records?
- Does everyone in the agency know the maintenance procedures?
- If there is a records schedule in place, does it still meet the office’s business needs?
- When was the last time this information was updated?

- Has the agency established and implemented regulations or procedures for the storage of security classified, Privacy Act, and other restricted records?
- Does everyone in the agency know the maintenance procedures?
- If there is a records schedule in place, does it still meet the office’s business needs?
- When was the last time this information was updated?
Lesson Summary

In this lesson, you learned:

- The definition of a recordkeeping system
- The primary purpose of records maintenance
- The benefits and potential problems of records maintenance
- That organizing your files is the next step in developing a records maintenance program
- Questions to consider when determining maintenance of records
Lesson 2: Organizing Information

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Module 4: Information Maintenance and Organization

Lesson 2: Organizing Information

NOTES

Knowledge Area 2: Creating and Maintaining Agency Business Information
January 2017
The integrity of official files must be ensured at all times so that all official records relating to the operations of the agency are documented in the official files. It is difficult to perform research when the information is incomplete or fragmented and stored in different locations. The location and custody of files should be properly documented in a file plan.
The following techniques can be used to help ensure complete documentation:

- Employees should incorporate official records into the official files, paper or electronic.
- Records removed from the official files should be controlled.
- For electronic records, accurate version control is critical for the identification of official files.
- A file plan should be maintained at each file station (textual and electronic) to distinguish the official files.
- The program office should identify and describe the type of information that exists in the official files to facilitate agency business.

You MUST know what the **business process** is and how it works to establish an effective filing system. It is critical that you work with the creators and users of the records. If the file scenario you devise does not work with the established business process, it will either inhibit the workflow, thus reducing productivity, or it will not be used, completely defeating your purpose of controlling the records in the first place.
Agencies need to organize records, whether paper or electronic, into file stations. **File stations** are designated areas (rooms or, in the case of electronic records, perhaps shared drives) to keep records. They are used to:

- Provide control and supervision over records
- Facilitate coordination between and among official file stations
- Ensure uniformity in filing and retrieval of records

**Electronic Filing Practices**

The electronic equivalent of a functional file station might be:

- A shared drive (usually a drive mapped to a particular server) designated for use by a particular department or division, is the electronic file station (referred to in the electronic world as a repository)
• Under the directories are subdirectories which might again be a sub-office, section, etc., under the next-higher office. This might relate to a designated drawer in the paper world.

• Within that sub-office would be folders and subdirectories that relate to the functions of that office, such as office administration, budgets, etc. These would relate to the record series dividers used in cabinets and shelves.

• Within the folders and subdirectories would be the electronic files, which are the electronic equivalents of documents. Of course, if more folders are necessary, the process of subdirectories can be proliferated hierarchically for as long as necessary. It is important to remember that users do not like to “travel” too far to file their document, so the fewer subdirectories, the more efficient and effective the system.

Rather than using a functional approach, another way of setting up both your paper and electronic records and files might be programmatic.

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So, in the electronic world, such a scenario could directly reflect this layout:

**Drive** = Programs

**Directory** = Specific Program Name

**Subdirectory** = Project Name

**Subdirectory** = Project Phase/Stage (e.g., Planning)

**Folder** = Aspect of Phase/Stage (e.g., Cultural Resources Site Survey)

**File** = Electronic Files Relating to the Site Survey
Strategies and Best Practices

• Develop and maintain policies and procedures that govern the use of shared drives
• Establish points of contact responsible for shared drive management
• Perform a risk analysis
• Identify personal materials and non-records
• Identify the record copy and maintain it in a designated area
• Establish and enforce naming conventions
  • Folder, sub-folder and file level
  • Structure folder and sub-folders to associate records
  • Use metadata, file plans, to link to related files

Strategies and best practices for managing content on a shared drive:

• Develop and maintain policies and procedures that govern the use of shared drives, including permissions, access controls, and acceptable formats for filing records needed for long periods of time
• Establish points of contact responsible for shared drive management
• Perform a risk analysis to determine if the shared drive can provide a sufficient audit trail
• Identify personal materials and non-records to ensure they are maintained separately from Federal records
• Identify the record copy and maintain it in an area designated for Federal records
• Establish and enforce naming conventions applicable at folder, sub-folder and file level
• Structure folder and sub-folders to associate any records with the corresponding records schedules including cutoff and disposal instructions
• Use metadata, file plans, and other tools to link related files in all media
• Work with Information Technology staff to ensure the integrity of the shared drive is maintained
• Train staff in the use of the shared drive and in their records management responsibilities

Some of these strategies and best practices for managing content on shared drives rely on manual intervention to provide the records management activities that an electronic system could do automatically.

http://www.archives.gov/records-mgmt/bulletins/2012/2012-02.html

(Refer to Handout 4.02 – E-Naming Conventions Directive, located in the Handouts section of your PG, for an example of naming conventions used within an electronic filing structure.)
File Stations

Fragmented documentation underscores the purpose of a coordinated network of file stations. The following are some of the issues associated with file stations:

- Identifying the office of record:
  - That is responsible for the maintenance and disposition of a record
  - That is responsible for filing the record copy of documents in the official file station
  - That is responsible for applying the authorized disposition instructions found in the agency schedule or the General Records Schedules (GRS)
• Managing multiple copies of the same document, and documents containing duplicative information
  – This includes messages created or received on electronic mail systems. Each document may have its own record status, depending on how it is used to transact business. Examples include:
    ▪ Electronic mail messages containing work assignments and due dates
    ▪ Two copies of the same map, one in the office dealing with location names and one in the office dealing with boundaries
    ▪ Correspondence sent from one Federal agency to another
  – Are duplicate files a problem? Are staff members keeping copies of records at their desk or on their computers? This is a practice that threatens the trustworthiness and integrity of the official files.
• Determining centralized, decentralized, or a combination system
  – One of the hardest decisions, and sometimes the most controversial, is whether the filing of your records should be centralized or decentralized
  – Desktop computers provide an environment for decentralization of files and add challenges to centralizing filing
A **centralized filing system** is one where the records of a unit are maintained in one central location. The single location is generally controlled by a records staff member.

If your agency has a fully functional electronic recordkeeping system, you would have an electronic centralized filing system.
• Advantages for paper and electronic:
  – Responsibility for filing is easily placed
  – Makes effective use of equipment, supplies, and space
  – Keeps all related data together
  – Reduces records duplication
  – Provides uniform service to all users
  – Improves security

• Disadvantages for paper:
  – Records perhaps too distant from staff for adequate service
  – Can result in increased personal filing systems
  – Requires full-time staffing
  – May require investment in more efficient filing equipment and automation
Decentralized Filing System

A decentralized filing system (paper and electronic) is one in which files are located in more than one location or computer throughout the office or program.
• Advantages:
  – Locates records near staff creating and using them
  – Does not require the extra space needed for centralized files
  – Does not require full-time staffing
  – Makes staff members more comfortable knowing they are in control of their own filing and retrieval

• Disadvantages:
  – Confusion as to where information can be found, especially if a staff member is absent
  – Danger of “fragmented” documentation – information related to the same topic or subject filed in multiple places
  – Individual staff members may not know how to properly maintain files
  – Lack of uniformity or consistency
Combination System

There are also ways to structure your program using a combined centralized and decentralized system. Centralized control is established through a Records Liaison, or Records Manager, who is the centralized point of contact for records management in the office who has responsibility for maintaining the office file plan and ensuring that established procedures are followed.

(Refer to Handout 4.03 – EPA: Centralized or Decentralized? That is the Question! located in the Handouts section of your PG for more information on centralized and decentralized systems.)
Textual and Electronic File Types

• Case files document a specific action, task, event, person, place, project, or other matter. Case files include personnel, project, and transaction files. Some 75-80 percent of all records created are case files.

• Case and project working files consist of background documents you may not need to keep as long as other materials.

• Subject files relate to general matters involving the agency’s program and administrative functions. They may also be referred to as general correspondence files. These consist of letters and memoranda, and may consist of forms, reports, and other matters relating to program and administrative functions.

• Technical reference files consist of nonrecord copies of articles, periodicals, reports, studies, vendor catalogs, and similar material that is needed for reference and information but is not properly part of the office’s records.
• Convenience files are nonrecord copies of correspondence, completed forms, and other documents kept solely for ease of access and reference.

• Transitory records are documents of short-term (180 or fewer days) interest or value which have minimal or no documentary or evidential value. These records may be destroyed immediately, or when no longer needed for reference, or according to a predetermined time period or business rule.

• Suspense files, or “tickler” files, include items that may be arranged chronologically by the date by or on which action must be taken (due date on a memorandum reply, date of an engagement, etc.), or may simply be a collection of notes about projects to be dealt with.
Lesson Summary

In this lesson, you learned:

• About the importance of organizing records into file stations
• About the importance of the integrity of official files
• About issues regarding file stations
• About centralized, decentralized, and combination systems
• About different file types
Lesson 3: Tools for Maintaining Your Records

NOTES

Knowledge Area 2: Creating and Maintaining Agency Business Information
Electronic Recordkeeping Systems

An electronic recordkeeping system (ERKS) is an electronic system that captures, organizes, and categorizes records to facilitate their preservation, retrieval, use, and disposition (36 CFR 1220.18). This system:

• Uses automated processes to manage the electronic records of an agency
• Should preserve the content of electronic records, and their context and structure, over time
• Collects, organizes, and categorizes records to facilitate their preservation, retrieval, use, and disposition
• Is distinguished from an information system by linkages to activities it documents and by its ability to preserve and provide access to the content, structure, and context of the records

An ERKS may be either a distinct system designed specifically to provide recordkeeping functionality, or it may be a module within, or a part of, another system (such as an application system or an electronic document management system).
Electronic Recordkeeping Systems vs. Electronic Information Systems

Electronic recordkeeping systems should not be confused with electronic information systems.

An electronic information system (EIS) is an information system that contains and provides access to computerized Federal records and other information (36 CFR 1236.2) – it captures (creates) information, but, unlike an electronic recordkeeping system, it does not manage information throughout the lifecycle.

This system:

• Is designed to manipulate, change, or update
• Supports day-to-day use of documents
• Provides for sharing files and information
Objective of electronic information systems:

- To provide access to records or information but do not provide records management functionality. Typical examples include payroll databases and census databases.

Limitations of electronic information systems:

- Do not effectively handle inactive information needed for historical or legal purposes.
- Do not support the preservation of the business context of an individual record (that is, content items are managed as individual units, instead of preserving their relationships to a larger group of documents that provide evidence of the same particular organizational function).
- Are not equipped with retention management components that track retention requirements, disposition, and destruction availability.
- Is NOT an electronic recordkeeping system.
An **electronic records management system** (ERMS), often referred to as a records management application (RMA), is an electronic management system in which any agency records, regardless of format (paper, electronic, microform, etc.), are collected, organized, and categorized to facilitate their preservation, retrieval, use, and disposition.

An ERMS:

- Provides document content, context, and structure
- Ensures authenticity, integrity, and reliability – i.e., contains unchanged, redundant information (does not allow records to be updated)
- Provides for compliance and disposition – i.e., meets regulations and complies with your records schedules
The diagram on the slide helps put electronic records management and electronic recordkeeping into perspective within a records management program.
Benefits of an ERMS or Records Management Application (RMA)

You cannot buy ERMS software that is ready for use right out of the box. You must work with the vendor and set up your own functional requirements.

ERMS has several beneficial features:

- ERMS can track and manage documents in their “native system” as they are created and passed from one point to another as works in progress. When an agency determines that a document is ready to be declared a record, it is frozen as such and filed in the computer under a hierarchical file classification scheme. Future searches of records are made by electronic queries.
- Records are managed by having retention schedules programmed within the ERMS, which then organizes the disposable files and generates destruction approval notifications.
- ERMS addresses the entire lifecycle of records from creation to maintenance and use to disposition.
- ERMS works well with mixed electronic record formats, and also manages paper and other hardcopy media.
Additional Benefits of ERMS or RMA

ERSM has multiple benefits, including:

- **Authenticity and reliability** – ERMS ensures the authenticity and reliability of agency records by protecting them from alteration or revision. ERMS manages documents in their “native system” as they are created and passed from one point to another as works in progress. As mentioned above, when an agency determines that a document is ready to be declared a record, it is frozen as such, thus preventing any changes to the record.

- **Business dispute resolution** – ERMS aids in business dispute resolution by providing fast access to records of agency transactions with customers, suppliers, and partners.
• **Improved efficiency and productivity** – ERMS improves efficiency and productivity, especially if ERKS is incorporated, by:
  – Sorting data easily and quickly
  – Providing easy access to existing relational data
  – Disseminating information to many locations rapidly
  – Helping the agency meet regulatory and other legal requirements
  – Automatically organizing disposable files and generating destruction approval notifications based on an agency’s records schedule (which is programmed into the ERMS)

• **Long-term cost savings** – ERMS provides long-term cost savings by reducing the need for parallel recordkeeping systems (e.g., paper and electronic), as ERMS works well with mixed electronic record formats and also manages paper and other hardcopy media
Potential Drawbacks of ERMS

There are some potential drawbacks to using ERMS:

- Retention schedules must be entered and maintained with ERMS. For the most part, this is still a highly manual process.
- ERMS does not handle documents in progress very well, because ERMS assumes that each document version is a record.
Electronic Records Management Systems vs. Electronic Recordkeeping Systems vs. Electronic Information Systems

Electronic Recordkeeping Systems (ERKS), Electronic Information Systems (EIS), and Electronic Records Management Systems (ERMS) are commonly confused terms. However, they are very distinct from one another, and it is important to clarify their differences:

- Electronic Information Systems do not have records management built in
- Electronic Recordkeeping Systems deal only with electronic records
- Electronic Records Management Systems deal with all formats of records

Electronic Recordkeeping Systems (ERKS), Electronic Information Systems (EIS), and Electronic Records Management Systems (ERMS) are commonly confused terms. However, they are very distinct from one another, and it is important to clarify their differences:

- Electronic information system (EIS) does not have records management built in
- Electronic recordkeeping system (ERKs) deals only with electronic records
- Electronic records management system (ERMS/RMAs) deals with all formats of records
Electronic Case Filing and Case Management Systems

The case file containing the stream of documents accumulated about a particular transaction or project is the primary repository of all information about that transaction.

Electronic case filing occurs when the documents themselves are filed electronically by scanning paper or through the maintenance of documents borne and transmitted electronically.

Originally, the term “case management systems” was used to describe electronic systems used to track, monitor, and manage a process documented in a case file. For example, a litigation case management system tracks every step of the litigation, including pleas, plea agreements, filing dates, documents filed, court dates, court of jurisdiction, attorney hours, and case disposition. In this instance, the documents themselves would still be maintained in paper.
What does an electronic case filing system do?

- Provides fast and inexpensive document retrieval and copying from remote locations. The instant search capability of the software allows for quick, efficient location of desired materials, compared to manual searching through multiple volumes of case materials. All staff working on the same project can have instant access to the same resources, the same page if necessary, without extra copies being made and distributed.

- Moves documents quickly, less expensively, and with greater security than paper-carrying systems such as the Postal Service or couriers.

- Copies information easily and rapidly. As a result, it greatly reduces the bother of tracking paper file custody and coping with lost case files.

- Maintains all records in one medium, instead of paper files in one place and electronic files (e.g., email) in another. This provides for more efficient case management and helps reduce potential liabilities associated with document management and retention.

- Creates a streamlined process that requires fewer records staff to manage administratively. This is possible only because of the partnership, or shared responsibility, among users and the records department. The users provide the documents that go into the system, and the records staff provides the consistency and conformity needed for the system to be effective.
Electronic Document Management Systems

An electronic document management system (EDMS), often referred to as a document management application (DMA), is a set of software and hardware applications that provides for the management of documents and has the following capabilities:

• Supports the processes of creating, editing, and reviewing work in progress
• Manages the creation, storage, and control of documents during daily use
• Works well with mixed electronic record formats and can provide revision and rendition controls
• Provides for sharing files and information – multiple project participants can work simultaneously in decentralized locations from a single master file, enabling everyone involved to be familiar with the same information at all times
• Provides immediate functionality to manage documents during daily use
• May use a combination of technologies, including:
  – Document management
  – Computer output to laser disk (COLD)
  – Imaging
  – Workflow software
EDMS solutions have certain limitations. Generally, EDMS solutions:

- Do not handle inactive information needed for historical or legal purposes effectively
- Do not support the preservation of the business context of an individual record (that is, content items are managed as individual units, instead of preserving their relationships to a larger group of documents that provide evidence of the same particular organizational function)
- Are not equipped with retention management components that track retention requirements, disposition, and destruction availability (indexing is still required to find information managed and stored)
- Usually do not address hardcopy or other nonelectronic media

Because of these limitations, EDMS is NOT an electronic records management system.
Slide 4-49

Knowledge Area 2: Creating and Maintaining Agency Business Information
January 2017
Historical developments in IT have shown that over the past decade, software vendors have had differing approaches to integrating systems that capture, store, manage, publish, and preserve information.

The discussion above of document management applications (EDMA) and electronic records management systems (ERMS) or RMAs demonstrate that the capabilities and limitations of each are complimentary; thus good electronic records management would be served best by combining their functions. Vendors are now starting to provide sophisticated integration options to combine these functionalities.

True integration of ERMS and EDMS can be achieved only when both of the following conditions are met:

• The ERMS and EDMS share common functionality
• The ERMS and EDMS share common metadata
There are currently three main types of integration:

- A standalone system, where separate EDMS/DMAs and ERMS/RMAs are purchased
- DMAs with records management capability or RMAs with document management capability
- Embedded e-records modules and metadata servers

Choosing which type of integration is right for you will depend on your business needs and financial constraints.
**Lesson Summary**

In this lesson, you learned:

- About the importance of organizing records into file stations
- About the importance of the integrity of official files
- About issues regarding file stations
- About centralized, decentralized, and combination systems
- About different textual and electronic file types
Module 4 Review and Wrap-Up

NOTES

Knowledge Area 2: Creating and Maintaining Agency Business Information
January 2017
Activity: Review of Records Maintenance

Slide 4-53

The purpose of this activity is to apply the maintenance practices covered in this module, and determine the best approach for maintaining the records in the following scenario.


**Review of Records Maintenance Worksheet**

**Scenario:**

The Division of Grants gives state and local government grants to build playgrounds in public parks. They receive 1,000 grant applications each year and approve 70 percent of the applications.

Most staff members are grant analysts who review grant applications, which include application forms, bids from playground construction companies, site plans, photographs, and correspondence.

Once projects are underway, the applications include correspondence, monthly narrative reports, financial reports, photos, and a completion-of-work form.

While the grant application is being reviewed, it stays with the analyst; upon approval, the application gets filed. Approved grants are kept for 30 years after the project is completed. Disapproved grants are destroyed in three years.

The Division also has correspondence files, procedures notebooks, policy files, and administrative files.

Because of space shortages in the building, the Division’s 50 staff members are located in three offices on two floors. Two offices are on the second floor, and one office (with one-third of the staff) is on the fifth floor. The Division director and managers, as well as the one Division secretary, are located in a second-floor office.
Questions:

1. What is the Division of Grants’ situation?

2. What type of maintenance system would you recommend (e.g., electronic case filing, EDMS, ERMS, and integrated systems)?

3. Describe your justification for the recommended maintenance system.

4. Explain the advantages and disadvantages of what you are proposing.
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Module Review

In Module 4, you learned:

- The primary purpose of records maintenance
- The four elements in a recordkeeping system
- The definition of a recordkeeping system
- The benefits of good records maintenance and potential problems of poor records maintenance
- How to begin records maintenance and ways to improve the process
- The importance of organizing records into file stations
- What file stations are used for
- About the integrity of official files
- Issues regarding file stations
- About centralized, decentralized, and combination systems
- About different file types

NOTES
Applying What You Learned

Reflect upon what you have learned in Module 4 and how you will apply it to your job.
**Module 4 - Action Items Worksheet**

| What did I learn about maintenance of Federal records that will help me at my job? |
| List at least one thing you learned about the maintenance of Federal records that is relevant to your job role and responsibilities. |
| |

| How will I apply what I learned about maintenance of Federal records to my job? |
| List at least one thing you learned about maintenance of Federal records that you will apply to your job, and explain how you will apply it. |
| |

| What “aha!” moments did I have during this module? |
| List any “aha” moments you experienced during this module. |
| (“A file plan includes much more information than just a listing of current file folders in their file cabinets?!? Aha!”) |
| |
Knowledge Area 2: Creating and Maintaining Agency Business Information

Module 5: Maintenance for Electronic, Social Media, and Special Media Records
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Module 5: Maintenance for Electronic, Social Media, and Special Media Records

Introduction and Objectives

Overview

This module provides guidelines for maintaining electronic, social media, and special media records.
Objectives

At the conclusion of this module, you will be able to:

- Identify criteria for maintaining records in all formats
- Identify the benefits and issues related to paper and electronic records systems
- Explain the tools used to maintain electronic records
- Identify challenges associated with the use of social media
Module 5: Maintenance for Electronic, Social Media, and Special Media Records

Lesson 1: Considerations for Electronic, Social, and Special Media

Slide 5-3

NOTES

Knowledge Area 2: Creating and Maintaining Agency Business Information
January 2017
Activity: Maintaining Electronic Records

Slide 5-4

Activity

Maintaining Electronic Records
Maintaining Electronic Records Worksheet

Use this worksheet to list the benefits and risks associated with maintaining electronic records.

1. The benefits associated with maintaining electronic records:

2. The risks associated with maintaining electronic records:
Today's Environment

For good, compelling reasons, information is increasingly digital.

Advantages:

• Digital information is easy to copy
• Digital information is easy to access and distribute
• Digital information is easy to process (search, modify, reformat, etc.)
• Digital information allows information from many sources to be integrated
• Digital information capitalizes on new capabilities of information technology – e.g., the web and social media

This increase in digital information creates new challenges for records management, including:

• Media life limitations
• Software dependency
• Sustainability and preservation
• Sharing and distribution
• Security
Media Life Limitations

Slide 5-6

This slide depicts the limited lifespan of media used to store digital documents. The practical physical lifetime of digital storage media can range from one year to 50, but, according to Jeff Rothenberg, “Digital information lasts forever or five years – whichever comes first.”

The reasons for the limited lifespan?

- Digital storage media can deteriorate due to physical, environmental, chemical, or magnetic effects
- The software and hardware needed to access data tend to become obsolete rather quickly

Whether it is a lifespan of one, five, or 50 years, the end result is the same, digital storage media do not last forever and digital information is vulnerable to loss.

NOTES
The Solution

Fortunately, there is a straightforward solution to the digital storage media lifespan problem: *documents must be copied to new media while they are still readable*. However, there are some things to keep in mind when copying to new media, including the following points:

- One must still take into consideration obsolescence as well as the physical lifetime of the new media
- Copying may change data format, compress, encrypt, etc., so you must be careful not to corrupt digital “bit streams” in the process
- Copy (“refresh”) cycles may have to be quite short to be safe – on the order of one to five years for current media. This requires a firm, funded commitment. Breaking the refresh cycle may make documents, in effect, irretrievable.
Software Dependency

Software-dependent documents are documents that can be seen only by running a specific program. They are stored in encoded form and understood only by that program, and they cannot be accessed, read, or printed without that program.

Examples of software-dependent documents include documents created with:

- Word processors or spreadsheets
- Database Management Systems (DBMS)
- Geographic Information Systems (GIS)
- Hypertext and hypermedia programs
When is a Document Really Software-Dependent?

Slide 5-9

To determine whether information is truly software-dependent, ask the following questions:

- Is the information meaningful only to its original software?
- Do you need a special program to access structure and content?
- Is the only way to make sense of the document to run the software?

Answering “yes” to any of these questions means the information is software-dependent.
Problems with Software Dependency

Software dependency creates a problem for Agency Records Officers (AROs) because the information is unusable – and in some cases, may not even really exist – without the software. So, maintaining only the data file for a software-dependent document is not enough, as the data must be usable throughout the lifecycle of the record. However, with the speed of software obsolescence, this can quickly become impossible.

Another problem with software dependency is that software-dependent information is also system-dependent, requiring a specific software environment (Operating System (OS), drivers, etc.), which in turn requires a specific hardware environment (Computer Processing Unit (CPU), I/O devices, etc.).
Unfortunately there is no single solution for software dependency as each situation must be dealt with on a case-by-case basis.

- Do you continue to run the software that created the information? This might require running the entire obsolete software and hardware environment in which the information was created. Can you really do this?
- Can you run similar software instead? If so, how similar does it have to be, and how much of the original information is lost in doing this?
- Can you translate the information into some new form and run new software to read it? How much of the original information is lost this way?

NOTES
Many of the guidelines for caring for permanent records relate to efforts to preserve the records forever. While the records are maintained in agency space, it is up to the agency to start the preservation process. The same can be said of caring for long-term temporary records. If you want records to be maintained for 100 years, then preservation is an important aspect of maintaining the records.
The term “sustainable” means the ability to access an electronic record throughout its lifecycle, regardless of the technology used when it was originally created. A sustainable format is one that increases the likelihood of a record being accessible in the future.
Characteristics of Sustainable Formats

Slide 5-13

Agencies should consider each of the following characteristics of formats, as they increase the likelihood that the information will be accessible over the long term.

- **Published documentation and open disclosure**: Publicly and openly documented formats adhere to specifications that are published and accessible. This allows software developers to create a wide variety of applications to read, process, and validate files. Openly documented specifications assist developers in creating tools to access the information in obsolete formats, and assist in migrating files to future formats. As an example, Tagged Image File Format (TIFF) is a format based on a publicly available, authoritative specification for scanned images.

- **Widespread adoption and use**: Formats adopted for widespread use have a higher probability of being sustainable. When a format is widely adopted by users, multiple software tools are created to open, read, and access the records and the market supports ongoing sustainability of the file format. The adoption of a file format by information creators, disseminators, and users is an indicator of sustainability. As an example, Hyper-text Markup Language (HTML) is a format that has been widely adopted for Internet use.
• **Self-describing formats:** Self-describing formats contain metadata needed to interpret the content, context, and structure of the record. Metadata embedded within the format minimize reliance on external documentation and the risk of disassociation of metadata from the file over time. While self-describing formats provide the capability for including metadata (e.g., in the file header or through tags within the file structure), they may not necessarily mandate it in the format specification.

• If present, the metadata should be easily accessed. This ensures that descriptive information about the record is sustainable. As an example, Extensible Markup Language (XML) is a self-documenting format because it describes its structure and field names.
When creating electronic records or converting source data, agencies can enhance sustainability by maintaining the original quality of source data. The following methods are typically applied through software settings and vary depending on the format being used.

- **Technical protection mechanisms**: Long-term records should be unrestricted and unencrypted so that user IDs and passwords are not needed to maintain the file.

- **Maintain integrity of source data**: Maintaining the original quality of source data can facilitate future migration and conversion. When using compression to reduce file size, agencies should use lossless compression (reducing a file’s size with no loss of quality) to maintain the integrity of source data. Lossless compression produces smaller file sizes without removing any information. Minimizing subsequent modification of the records after production is also recommended to maintain integrity. Lossless compression can be applied to both image and audio files.
Quality and Functionality Factors

Slide 5-15

A format must be able to represent the characteristics that are meaningful to current and future users. These quality and functionality factors, such as visual presentation and manipulability, vary by type of record and the needs of its users. For example, the meaningful characteristics of sound records are different from those of digital photography.

User expectations establish what might be called normal rendering for a given record. Normal rendering is a baseline for the behavior of content when presented to a user, e.g., images that permit zooming or sounds that can be played, stopped, and restarted.
Strategies for Digital Preservation

Agencies may employ a number of strategies to preserve their digital records. A few of the most common are:

- **Replication**: Replication is a strategy of creating duplicate copies of data. Single copies of data are vulnerable to hardware or software failure, alteration, and environmental catastrophe. Data is more likely to survive if it is replicated in several locations. Replication may require your agency to establish procedures for refreshing, versioning, and access control.

- **Emulation**: Emulation is a strategy where the functionality of one system is recreated by a new system, so that the second system behaves like the first. Emulation stresses the reproduction of system behavior, such as the exact display of the record.

- **Migration**: Data migration is a set of organized tasks designed to achieve periodic transfer of digital materials from one hardware and software configuration to another, or from one generation of computer technology to a subsequent generation.
Data Migration

Electronic records of continuing value need to be migrated through successive upgrades of hardware and software in such a way as to retain the functionality and integrity of the electronic records created in them. The preservation of this integrity requires that the record be authentic, reliable, complete, and possess sufficient context.

The purpose of data migration is to:

- Retain the ability to display, retrieve, manipulate, and use digital information, in the face of constantly changing technology
- Preserve the integrity of electronic records and retain the ability for users to access them as authentic records, in the face of constantly changing technology
- Preserve the content, structure, and context of records as evidence of business transactions

Migration is the focus of the preservation of continuing accessibility to electronic records, rather than the preservation of individual items or formats.

NOTES
Challenges of a Data Migration

Electronic records and information have features that make the challenge of preserving them significantly more difficult than other media. These challenges include:

- Existing in a single medium or as a multimedia (image, text, and sound) record
- Comprising a number of elements (hardware, software, data, and medium)
- Relying on metadata embedded in computer software and hardware to link content and structure to context (to provide a record in a recognizable form)
- Preserving intellectual-level connections and control mechanisms among the various elements
- Upgrading hardware and software every 18 months to three years to overcome obsolescence is required. The physical fragility of electronic media poses a less significant threat to the preservation of an electronic record’s integrity than technological obsolescence. For example, a record on a floppy disk is essentially lost if the hardware required to read it becomes obsolete or unavailable.

(Refer to Handout 5.01 – Migration Strategies Quick Reference Guide, located in the Handouts section or your PG for a quick reference for cases where you need to cover migration issues quickly, such as having to attend a meeting or to point out the key points.)
Sharing and Distribution

One of the benefits of electronic records is the ease that they can be shared and distributed. However, this benefit increases challenges for AROs:

- **Version control** – With electronic records, versions abound – unnumbered drafts, evolving filenames, multiple users, editors, or writers
- **Accumulation of nonrecord materials** – Electronic records make it easy to create nonrecord materials such as false starts, reference-only material, personal notes, communication debris, and the like
- **Multiple copies of records** – Multiple copies often include incomplete versions, cut-and-paste additions, etc.

Clearly, this proliferation of electronic records has serious implications for the trustworthiness of the records.
Security

There are two types of security:

- System-level
- User-level

Security is a balancing act. Too much security makes computers hard to use and too little security results in data loss and unauthorized access.

There are two types of security:

- System-level
- User-level
System-Level Security

System-level security is performed by system administrators and includes:

- Setting access permissions
  - Granting users read, write, and modify privileges
  - Granting users access to parts of the system
  - Limiting access to only what a user needs
- Providing backups, etc.
  - Backups are not an “archive” – they are not a records management solution to preserving records
  - Backups are used to restore a system that may have been damaged
- Virus checking, spam block software, spyware blockers

User-Level Security

- Computer systems are usually protected with user names and passwords. AROs are involved in assigning restricted access to certain documents. Restricted access is often related to Freedom of Information Act (FOIA)-exempt documents or those involved in the Privacy Act.
- Agencies are required to provide annual IT security training to all staff. Although this training is administered by IT Security, AROs should work with them to promote the proper security of Federal records.
General Guidelines for Maintaining Electronic Records

The following requirements apply to all electronic information systems that contain Federal records, regardless of media or application:

- Records in program or office electronic information systems need to be readily identifiable
- Electronic recordkeeping systems that maintain the official copy of text documents on electronic media must provide indexing or text search capabilities
- Electronic recordkeeping systems require user identification codes or passwords to control access and ensure integrity of the documents
- The program or office needs to back up electronic records regularly to safeguard against loss of information due to equipment malfunction or human error
- The program or office avoids the use of unstable media (such as flash drives or CDs and DVDs) for the exclusive long-term storage of permanent or unscheduled records

NOTES
General Guidelines for Maintaining Electronic Records (cont’d.)

- Provide a standard interchange format
- Maintain complete and up-to-date technical documentation
- Safeguard and maintain all required software and hardware
- Make sure procedural controls are in place

• Electronic recordkeeping systems need to provide a standard interchange format when necessary, to permit the exchange of electronic documents between agency or program components using different software and operating systems, and the conversion or migration of documents from one system to another.

• The program or office must maintain complete and up-to-date technical documentation for each electronic information system that contains Federal records.

• The program or office safeguards and maintains all software and hardware required to read electronic records throughout their life.

• Procedural controls are in place for all electronic recordkeeping systems to protect the integrity of the Federal records and their legal admissibility under the rules of evidence.
The following are some general tips for caring for permanent electronic records, which also apply to caring for long-term temporary records:

- Permanent records require special care and storage, and should be scheduled for transfer to the legal custody of the National Archives.
- Agencies must maintain the storage and test areas for electronic records storage media containing permanent and unscheduled records within the temperature and relative humidity ranges specified in 36 CFR 1236.28.
- Furthermore, if the agency cannot provide proper care and handling of the special media, as cited in 36 CFR, or if the media are becoming obsolete and the agency cannot migrate the records to newer media, the agency must contact NARA to arrange for timely transfer of permanent electronic records even when the timing is earlier than provided in the records schedule. This occurs through a process called pre-accessioning.
- When transferring permanent electronic records to NARA, please follow NARA’s pre-accessioning policies and ERA transfer guidelines.
Module 5: Maintenance for Electronic, Social Media, and Special Media Records
Lesson 1: Considerations for Electronic, Social, and Special Media Records

• Pre-accessioning occurs when NARA fully processes permanently valuable electronic records in order to assume physical custody before the records are scheduled to become part of the National Archives of the United States. The agency maintains legal custody and responsibility for access.

• The Electronic Records Archives (ERA) is NARA’s system that allows Federal agencies to perform critical records transactions with NARA online. ERA is designed to preserve and manage NARA’s electronic records and to manage the lifecycle of records and other holdings, including support for records retention schedules and the accessioning process for all Federal records.

   ERA does more than just store data. ERA provides a true digital archive that complies with all laws and regulations that apply to Federal, Presidential, and Congressional records. ERA provides workflow support for many of the transactions that occur between NARA and its agency customers to process and preserve electronic records.

   More information on ERA can be found at http://www.archives.gov/records-mgmt/era/.

NOTES
Guidelines for Electronic Record Media and Formats

In addition to the guidelines for maintenance for general and permanent electronic records, there are specific concerns regarding the dependency of the file format and storage media.
Magnetic media are capable of storing digital or analog information in the form of electromagnetic signals. Examples of magnetic media are magnetic tapes, disks, audio tape, and video tape.

The following issues should be addressed to ensure the proper maintenance of records on magnetic media:

- The office should implement a standard procedure for external labeling of the contents of diskettes, disks, magnetic tape reels, or cartridges
- Tapes used for permanent and unscheduled records need to be tested within six months prior to use to verify that they are free of permanent errors
Magnetic Media (cont’d.)

- Review a statistical sample of permanent and unscheduled records tapes to identify loss of data
- Copy tapes used for permanent and unscheduled records before they are 10 years old
- Store magnetic media containing permanent or unscheduled records under recommended temperature and humidity conditions, and protect from magnetic fields

- An annual statistical sample of tapes used for permanent and unscheduled records should be read to identify any loss of data, and to discover and correct the causes of data loss
- Tapes used for permanent and unscheduled records should be copied, before they are 10 years old, onto tested and verified new tapes
- Magnetic media containing permanent or unscheduled records must be stored under recommended temperature and humidity conditions (between 62 and 68 degrees Fahrenheit and constant relative humidity between 35 and 45 percent) and protected from exposure to magnetic fields (small motors – for example, vacuum cleaners – can create a magnetic field)
Imaging is a process by which a document is converted from a human-readable format to a computer-readable digital image file. These imaged pictures of documents can be stored on a variety of media:

- Disks
- Hard drives
- Magnetic cartridges
- Optical media
- Near-line storage

When combined with effective indexing, imaging files can shorten information retrieval time and allow access to documents for multiple users at various locations.
Image files come in many different types of software-dependent formats (PDF, GIF, JPG, and TIFF):

- Formats are proprietary:
  - Computers need software to convert the images back to a human-readable format
  - Proprietary file formats may not be supported long-term by manufacturers
  - Many file formats use compression to store more data in less space
  - Compression may be:
    ▪ Lossless (less compression, but no data loss)
    ▪ Lossy (deep compression with subsequent data loss) file formats that do not necessarily look the same after compression
- Search and retrieval normally depend on some form of indexing by one or more of the following fields:
  - Author
  - Recipient
  - Date
  - Title
  - Content knowledge
  - File plan classification

This index is typically an electronic database that is linked to the images via metadata. Metadata associated with an image file are related to metadata contained within the index. The index may contain multiple data associated with the image. Useful indexing requires careful planning and forethought before any actual imaging begins.
Optical Imaging Systems

An optical imaging system consists of hardware and software that allows one to scan and digitize source documents which are stored on hard drives or magnetic media. Proper indexing and optical character recognition of these images allows for rapid retrieval.

In addition to applying the electronic records general requirements, the following points should be used in evaluating compliance with recordkeeping requirements for optical imaging systems:

- CD-ROM disks and other optical media used to store permanent records need to meet NARA transfer requirements
- Optical imaging systems must conform to NARA policy requiring the disposition of original records when converting to an optical digital data disk storage system
  - Loss of data may result from handwritten text, images with poor contrast, unusual type fonts, or mixed text and image documents

NOTES
Email

Email is only a vehicle for transmitting information:
- An email system carries both records and nonrecord materials
- Establish guidance and policies on the identification and preservation of electronic records, including email

**Email** is only a vehicle for transmitting information. An email system carries records, nonrecord, and personal information. We are reminded that even nonrecord materials must be produced for FOIA or discovery if they exist. Like copies of paper documents, incriminating email lurks on every backup tape, on individuals’ hard drives, and on disseminated copies.

Agencies do not need to keep every email. Agencies must develop guidance and policies on the identification and preservation of electronic records, including email.

Email messages are records when they meet the definition of a record as cited under the Federal Records Act (FRA). See 36 CFR 1222.10 and 1236.2.

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**NOTES**
Email Archiving

Email archiving refers to applications that remove email from the mail server and manage it in a central location.

- Agencies are responsible for addressing areas where the applications do not meet the requirements of the Federal Records Act and NARA regulations.

Email archiving generally refers to applications that remove email from the mail server and manage it in a central location, also known as an archive. Information technology professionals use the term “archiving” to mean the copying or transfer of files for storage. In email archiving, applications typically require little to no action on the part of the user to store or manage the email records. Once messages are stored, authorized users are able to search the repository.
If an agency decides to use email archiving applications to manage Federal records, the agency is responsible for meeting the requirements of the Federal Records Act (FRA) and applicable NARA regulations. Recordkeeping systems that include electronic mail messages must:

• Provide for the grouping of related records into classifications according to the nature of the business purposes the records serve
• Permit easy and timely retrieval of both individual records and files or other groupings of related records
• Retain the records in a usable format for their required retention period as specified by a NARA-approved records schedule
• Be accessible by individuals who have a business need for information in the system
• Preserve the transmission and receipt data specified in agency instructions
• Permit transfer of permanent records to NARA (see 36 CFR 1235.44-1235.50 and 36 CFR 1236.20)

Email archiving applications may provide the following benefits (this list is not exhaustive due to different features and strengths):

• More efficient storage of email because it is moved from a distributed network of servers, desktop applications, and other places to be managed in one place
• Enhanced electronic search capability for content that may be germane to a subpoena, Freedom of Information Act (FOIA) request, or e-discovery request
• Assists in backup and disaster recovery

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Email Key Points

Key points to remember about email:

- Messages that are not Federal records may be deleted when no longer needed
- Email messages must be filed with related records. All components of the message must be filed, such as the metadata information [author, recipient(s), subject, time and date sent or received]; the body of the message; and all attachments.
- The retention schedule (either agency or the General Records Schedules (GRS)) dictates the retention period for email
- Backup tapes are scheduled for disposal under GRS 3.2
- Transitory (fewer than 180-day retention) email records are scheduled for disposal under GRS 4.2
Word Processing Files

Word processing applications capture recorded information. The creator of the word processing record should:

- Identify the record status of drafts and other background materials, and file them in the appropriate recordkeeping system
- Ensure that the support staff generates appropriate file copies
- Ensure that the final documents and official file copies show the date, approval of the signer, and the file classification
- Ensure that any necessary drafts and related materials are attached to the official file copy

Word processing applications capture recorded information, but to properly manage the information (especially if it is determined to be a record), the recorded information will need to be moved and managed in a recordkeeping system (paper or electronic). The creator of the word processing record should perform the following tasks:

- Identify the record status of drafts and other background materials and file them in the appropriate recordkeeping system (paper or electronic)
- Generate, or ensure that the support staff generates, appropriate file copies of final documents
- Ensure that the final documents and official file copies show the date, approval of the signer, and the file classification
- Ensure that any necessary drafts and related materials are attached to the official file copy
Social Media

Social media refers to the various activities integrating web technology, social interaction, and user-generated content. Social media includes blogs, wikis, social networks, photo libraries, virtual worlds, location-based services, and video sharing sites. Agencies use social media both internally and externally to share information, support business processes, and connect people to government. Social media allows individuals to collaborate, create, organize, edit, comment on, combine, and share content, likely resulting in the creation of Federal records.
Social media platforms can be grouped into several categories:

- **Web Publishing:** Platforms used to create, publish, and reuse content
  - Microblogging (Twitter, Plurk)
  - Blogs (WordPress, Blogger)
  - Wikis (Wikispaces, PBWiki)
  - Mashups (Google Maps, popurls)
- **Social Networking:** Platforms used to provide interactions and collaboration among users
  - Social networking tools (Facebook, LinkedIn)
  - Social bookmarks (Delicious, Digg)
  - Virtual worlds (Second Life, OpenSim)
  - Crowdsourcing and social voting (IdeaScale, Chaordix)
- **File Sharing and Storage:** Platforms used to share files and host content storage
  - Photo libraries (Flickr, Picasa)
  - Video sharing (YouTube, Vimeo)
  - Storage (Google Docs, Drop.io)

When using Web 2.0 and social media platforms, the following non-exhaustive list of questions may help determine record status:

- Is the information unique and not available anywhere else?
- Does it contain evidence of an agency’s policies, business, mission, etc.?
- Is this tool being used in relation to the agency’s work?
- Is use of the tool authorized by the agency?
- Is there a business need for the information?

If the answers to any of the above questions are yes, then the content is likely a Federal record. For more information please visit [http://www.archives.gov/records-mgmt/bulletins/2014/2014-02.html](http://www.archives.gov/records-mgmt/bulletins/2014/2014-02.html).
Due to the dynamic and collaborative nature of social media, agencies face the following challenges:

- Recordkeeping in a collaborative environment
- Content located in multiple places
- Ownership and control of data that resides with a third party
- Identification of records
- Implementation of records schedules
- Capture of complete records
- Capture of frequently updated records
- Capture of complete records in a manner that ensures their authenticity
- Public expectations that all web content is both permanently valuable and accessible
- Handling of records containing personally identifiable information

**Addressing Challenges**

Agencies must articulate clear processes, policies, and recordkeeping roles and responsibilities to ensure social media records are identified, managed, and captured.
The Web

The web is more than a place to post, browse, and share textual information. It is a place for experiencing and sharing more complex information, for commerce, and interactive applications.

How do AROs and archivists view the preservation of a website’s information?

As organizations increase web usage, questions arise about who controls the accuracy of information posted; whether the information is credible and up-to-date; and issues of ownership of the content.

How websites are used:

- **Static repository** – This repository is used to view and download agency publications, but is infrequently updated
- **Dynamic repository** – This is the same as a static repository, but materials are changed more frequently to keep information accurate and relevant
- **Communications** – Messages sent by the public via web mailboxes are generally captured in the agency email system. As a result, they are not part of the website.
- **Query-driven** – A website serves as a front-end interface for databases and other “back-end” services that are updated frequently
- **Information interaction** – A website is a significant mechanism for public interaction: electronic fill-in forms, electronic town meetings, soliciting comments, etc. Information supplied by end users and displayed on the site changes frequently.
There are three categories of web records:

- Records relating to website development and administration
- Records relating to technical operation of the website
- Records relating to website content
Apply What You Know About Electronic Records to Web Records

You need to apply what you have learned about electronic records to web records. You must identify those web-related records needed to ensure trustworthiness for your website. Use the concepts of reliability, authenticity, integrity, and usability to establish criteria to identify web-related records needed to document agency programs.

The following list contains some of the major types of information found on websites that must be managed as records. These types of information may exist in electronic or non-electronic format.

Types of website records:
- HTML-encoded pages
- Images of web content pages
- Listings of URLs referenced by a site
- Records generated interactively on the web
- Web design records
- Copyrighted webpage content and records documenting use of such content
Management and Disposition of Web Records

Manage web records by preserving their content, context, and structure. Be sure to include websites and website-generated records in your retention schedules.

- Assess
  - Business needs
  - Risk
- Consider
  - Whether web content is available elsewhere
  - Government accountability
  - Legal rights

Geographic Information Systems and Computer-Aided Design

Geographic Information System (GIS) and Computer-Aided Design (CAD), sometimes seen as CADD, (Computer-Aided Drafting and Design) products are electronic records that are the equivalents of cartographic and architectural records, and they are extraordinarily complex and difficult to manage. Like most e-records, they consist of different components, and the systems used to create them were specifically designed to make the documents as “manipulable” as possible.

As with other electronic records, these must be maintained within the systems that created them and that make them available for use. The “records” can be captured at various phases in their lifecycle.

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Databases

Databases contain records, and the maintenance of databases requires more than the periodic backup or copying of your files.

Maintenance involves recognizing components of a database. Depending on the system, most users see only the inputs, such as a form they see for data entry, or the outputs, such as the result of a query or report. From that query, and based on their administrative rights, they may view, change, or delete records. Results of these queries are sent through yet another software module, called an Application Programming Interface (API), which also may contain icons, printer controls, etc. You do not need to schedule these as records, but it is important to be aware of the processes and components that are involved in database maintenance. You also need to ensure that preservation is built into operating procedures.
Portable Document Format

Adobe PDF was created primarily for organizations to distribute and exchange documents. However, it has been adopted by organizations as a way to exchange documents quickly and also reduce reliance on paper. Agencies need to facilitate long-term preservation and future access to these records.

Portable Document Format (PDF) was invented by Adobe. It was created primarily for organizations to distribute and exchange documents. However, it has been adopted by organizations as a way to exchange documents quickly and also reduce reliance on paper.

Although Adobe PDF files look exactly like original documents and preserve the fonts, images, graphics, and layout of any source file, they can still be a challenge to maintain.

Although your PDF files may not be appraised as permanent records, you still need to maintain them for your agency’s business. Many of the same principles used for the transfer of permanent records should be considered for your records, especially those with long-term records retention.

NARA issued transfer guidance for these records at http://www.archives.gov/records-mgmt/policy/transfer-guidance.html
Audiovisual Records

The original and reference copies of audiovisual records should be maintained separately from each other.

Maintain cross-references.

Ensure that information on permanent or unscheduled magnetic sound or video media is not erased.

Retain original photographic images.

Maintain original scanned photographs.

Store permanent records in environmentally controlled space.

The original, reference, and digital copies of audiovisual records should be maintained separately from each other.

Finding aids, such as indexes, captions, lists of captions, data sheets, shot lists, review sheets, and catalogs (published or unpublished), should be maintained for all audiovisual records.

Cross-references to closely related textual records should be maintained with audiovisual records.

The program or office must institute procedures to ensure that information on permanent or unscheduled magnetic sound or video media is not erased or overwritten.

The program or office must retain original photographic images created electronically through digital photography.

The program or office must institute policies to properly manage both original photographic images, converted to digital format and for those that are born digital.

The program or office must store permanent audiovisual records, particularly color films and photographs, in environmentally controlled conditions (72 degrees Fahrenheit or less, and relative humidity between 30 and 40 percent).

For permanent audiovisual records, NARA can accept special media early in order to provide better environmental conditions.
Cartographic and Architectural Records

Slide 5-41

- Maps and drawings must be stored flat in shallow-drawer map cases
- Permanent maps and drawings must be stored in acid-free folders
- Large, heavy atlases and other bound volumes of maps or drawings must be stored flat
- Adequate finding aids, such as indexes, must exist
- Cross-references to closely related textual records must be maintained

- Maps and drawings must be stored flat in shallow-drawer map cases, rather than folded or rolled
- Permanent maps and drawings must be stored in acid-free folders
- Large, heavy atlases and other bound volumes of maps or drawings must be stored flat, preferably on roller shelves to facilitate moving them without damage
- Adequate finding aids, such as indexes, must exist for cartographic and architectural records
- Cross-references to closely related textual records must be maintained with cartographic and architectural records
- For electronic GIS records see page PG 5-48
Micrographic Records

- Records on microform must be arranged and indexed
- Microforms need to contain a title header for identification
- Boxes containing microforms must be individually labeled with the record series title and date span
- Permanent and temporary records must be filed separately
- Silver and nonsilver microforms must be filed separately
- Silver master microforms of permanent and unscheduled records must be inspected every two years while in storage

NOTES
**Lesson Summary**

In this lesson, you learned:

- That the agency starts the preservation process for electronic, social media, and special media records
- The definition of sustainable formats
- The characteristics of sustainable formats
- Tips for caring for long-term temporary and permanent records
- Maintenance requirements for electronic records
- Considerations when automating work processes and the facets of data migration
- Issues pertaining to the proper maintenance of records on different media and in different formats
- Challenges associated with social media records
- Tips for maintaining special media records, including cartographic and architectural records, and micrographic records

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**NOTES**
Module 5 Review and Wrap-Up

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Module Review

In Module 5, you learned:

- That the agency starts the preservation process
- The definition of sustainable formats
- The characteristics of sustainable formats
- Tips for caring for long-term temporary and permanent records
- Maintenance requirements for electronic records
- Considerations when automating work processes and the facets of data migration
- Challenges associated with social media records
Applying What You Learned

Reflect upon what you have learned in Module 5 and how you will apply it to your job.

NOTES
Module 5 Review and Wrap-Up

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# Module 5 - Action Items Worksheet

## What did I learn about maintenance of Federal records that will help me at my job?
List at least one thing you learned about the maintenance of Federal records that is relevant to your job role and responsibilities.

## How will I apply what I learned about maintenance of Federal records to my job?
List at least one thing you learned about maintenance of Federal records that you will apply to your job, and explain how you will apply it.

## What “aha!” moments did I have during this module?
List any “aha” moments you experienced during this module.

(“A file plan includes much more information than just a listing of current file folders in their file cabinets?!? Aha!”)
Course Evaluation

Thank you for supporting NARA’s Records Management Program. We value your opinion of our training course. Please take a few minutes to complete the course evaluation once it is available at NARA’s Learning Center: [https://nara.csod.com](https://nara.csod.com). Availability should be no later than 24 hours after the course’s conclusion. Participants must complete and submit their course evaluation in NARA’s Learning Center before they can receive their course certificate.
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Final Questions

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Course Wrap-Up

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Resolving Final Questions

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Course Wrap-Up

Resolving Final Questions

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Where to Go for Help

Slide Wrap-Up-3

Getting Help – You Are Not Alone!

• Your Agency Records Officer
• NARA assistance

Help Resources

Help is available.

• Your Agency Records Officer (ARO) should be your first source for records management inquiries
• National Archives and Records Administration’s (NARA’s) Contact Information for Federal Agency Appraisal and Scheduling Teams posted on the NARA website at http://www.archives.gov/records-mgmt/appraisal
• NARA’s Records Control Schedules (RCS) Repository located at http://www.archives.gov/records-mgmt/rcs
• NARA’s National Records Management Training Program website at http://www.archives.gov/records-mgmt/training
• NARA’s Bulletins are located at http://www.archives.gov/records-mgmt/bulletins
• NARA’s Frequently Asked Questions (FAQs) on records management are located at http://www.archives.gov/records-mgmt/faqs

NOTES

Knowledge Area 2: Creating and Maintaining Agency Business Information
January 2017
Getting Help – You Are Not Alone! (cont’d.)

- NARA’s website: http://www.archives.gov
- Records Management Resources on the Internet

- Reference 02 – Records Management Resources on the Internet
• Publications
  – The publications and posters may be downloaded via NARA’s webpages and they can be reproduced as needed. Refer to NARA’s website for publications and posters at [http://www.archives.gov/publications/records-mgmt.html](http://www.archives.gov/publications/records-mgmt.html).
NARA's National Records Management Training

• Course listings, registration, and payment will be handled online at http://nara.csod.com/recordsmanagement-training
Course Evaluation

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