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1. INTRODUCTION TO RECORDS MANAGEMENT

1.1 The Need for Records Management

According to Federal law (44 U. S. C. 2901), records management is:

the managerial activities involved with respect to records creation, records maintenance and use, and records disposition in order to achieve adequate and proper documentation of the policies and transactions of the Federal Government and effective and economical management of agency operations.

The primary purpose of records management is to manage the risk and cost created by an organization's information whether it be in electronic or physical form. Any type of business document can be classified as a record. Once it is designated a record, the document is managed by the organization, not the creator. This is the primary difference between document management and records management. Records are owned by the organization, not the individual who created them.

Records management must be done because it makes sense from an economic and efficiency standpoint; it enables the Office of Student Financial Assistance (SFA) to fully document its actions and decisions; and it is required by Federal statute and regulation.

Records generally go through a life cycle: creation, maintenance and use, and disposition. Effective records management involves the coordination of all life cycle phases. Disposition does not necessarily mean to destroy. Disposition is any action which can take place when a record is no longer required for maintenance and use.

Records disposition is a critical element of records management. All records must be scheduled on an official records disposition schedule. NARA issues the General Records Schedules for records that are common to most agencies. It is the responsibility of each Department or Agency to schedule the records that are specific to their functions and programs. Therefore, SFA must assemble its own schedule. A sound records disposition schedule allows for the archiving of records that are not needed for current business, in addition to the destruction of temporary records or the transfer of permanent records to the National Archives.

Each Department or Agency must have a records manager who coordinates all records management activities. However, records management is the responsibility of all employees. An effective records management program involves a strong directive that includes training employees and publicizing the program. When properly implemented, records management ensures that: complete records are maintained, records can be located when needed, vital information is properly safeguarded, better management decisions can be made, and legal risks are minimized.

1.2 Electronic Records Management Systems

1.2.1 DoD 5015.2

The U. S. Department of Defense developed the DoD 5015.2 standard with the endorsement of the U. S. National Archives and Records Administration (NARA). The standard mandates that all Department of Defense's electronic records management systems (ERMS) must be in compliance with the DoD 5015.2 standard. The standard lists 127 mandatory requirements and 48 optional requirements. The Department of Defense issued the standard in 1997 and NARA's endorsement was received in 1998. In October 2000, a revision to the standard was proposed. This revision is currently going through a public comment phase.

1.2.2 System Components

Electronic records management systems often include document management components in addition to the records management functions they support. These components can be divided into the following areas:

Document Input – The ability to add documents to the system whether it is through imaging paper or the importing of electronic files.

Document Management – Facilitates the retrieval and management of electronically stored documents through the use of indexes, version control, access control.

Records Management – Manages the risks and costs associated with the organization's information. Changes the ownership of a document from the individual to the organization. Records management includes the classifying of documents and the disposition of documents.

Workflow – Workflow systems are designed to automate business process. They allow for more efficient business practices as the systems define routing and processing schemes.

Search and Retrieval – Full text searches in addition to the standard indexed search are available to locate documents and information in the system.

Storage – All documents are stored in a central repository for the organization. The repository can be magnetic storage, CD, DVD, or other optical disk. Documents may be archived and stored offline for later retrieval.

Publishing – The publishing component allows for the output of documents from the system. This incorporates simple printing tasks along with electronic publishing to the Internet.

2. DETERMINING WHICH DOCUMENTS ARE RECORDS

2.1 Definitions

The basic definition of a Federal record can be found in 44 U.S.C. 3301:

all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them.

Agencies generally have a wide variety of non-record items as well as personal papers.

Non-record materials are:

1. Extra copies of documents preserved only for convenience of reference.
2. Stocks of publications and of processed documents. Each agency needs, however, to create and maintain record sets of processed documents and of publications, including annual and special reports, special studies, brochures, pamphlets, books, handbooks, manuals, posters, and maps.
3. Library and museum material made or acquired and preserved solely for reference or exhibition purposes.

Personal papers are documents that belong solely to an individual and are not used in the conduct of Government business. They relate to an individual's personal or private affairs and are not the property of the Government. They may comment on Government or agency functions, such as a diary, as long they are not used in the conducting of Government business.

2.2 Working Papers

It is not uncommon for individuals to consider the files in their desk drawers to be working papers. According to NARA, working papers consist of documents "such as rough notes, calculations, or drafts assembled or created and used to prepare or analyze other documents."

A distinction must be drawn between supporting documents and working papers. Generally a working paper may become a record if it documents the development of a program. If the document duplicates information that is documented elsewhere, it is not necessarily a record.

Supporting materials are not working papers. Supporting materials are documents that are necessary to substantiate the final document or decision trail. Supporting materials are part of the official record.

For example, a draft that is circulated for review and comment is a record. A draft that is prepared by an individual for their use while writing, and is not shared with colleagues is most likely not a record.

Working papers are not the same as personal papers because by definition they relate to Government business. While a working paper may be for the exclusive use of an individual to complete their work, it is still Government property and is subject to the Freedom of Information Act (FOIA). Under FOIA, even non-records may need to be produced upon request.

As long as a working paper does not become a record, it can be destroyed once it is no longer needed.

2.3 Identifying Records

A record is the documentary evidence of SFA's actions, policies, commitments, and interests. It can be in any form. Documents and material that show evolution may become part of the record. For example, drafts of policy statements or drafts of reports are records because they illustrate how the final product was created.

Records may be electronic information. Data contained in computer database applications may also constitute a record. That data must be preserved. Certain reports generated from this data may not be reproducible because of the nature of the data. Those reports must then be preserved because they are records. An example, balance sheets generated by accounting systems usually cannot be reproduced. A balance sheet is a representation of a moment in time. Also, reports produced by systems which no longer exist should be retained as a record.

Identifying whether something is a record is basically a two step process. First, the nature of the information must be determined. If the information contained in the document or material gives evidence of SFA's actions, policies, commitments, and interests, it may be a record. Second, if it is determined that the material may be a record, then its use and role in the office must be determined. For example, if an office has custody of the original or uses the material in some action, then it is a record. If an office merely has a copy of the material for convenience, it is not a record.

The following is a detailed list of conditions that apply to records. If any one of these is true, then the document may be a record.

1. The material documents or facilitates agency actions, formulation of policies and decision, directives.
2. The material protects Government and individual rights and interests.
3. The material provides information required by Congress.
4. The material has administrative, fiscal or legal value.

5. The material has historical informational or evidential value.
6. The material has programmatic value.
7. The material is required to operate programs or provide program support functions.
8. Statute or legislation mandated the material.
9. The material supports a financial or legal claim or obligation.
10. The material was created or received in the conduct of Government business.
11. The material was filed, stored or otherwise systematically maintained by SFA.
12. The material is appropriate for either permanent or temporary preservation.

If any of the above conditions are true, then one of the following must also be true in order to have a record.

1. Your office created it.
2. Your office acted on it.
3. Your office received it for action.
4. Your office is the designated custodian.
5. Your office needs it to document its activities or decisions.

In summary, if one condition from the first list and one condition from the second list are true, then it is a record. Please refer to figure 2-1, which illustrates this process in greater detail.

3. RECORDS RETENTION SCHEDULES

3.1 Categories of Records

Once a document is identified as a record it must be further categorized so it can be properly disposed of. All Federal Government documents fall into two general disposition categories: temporary or permanent.

The vast majority of records in the inventory of the Federal Government can be classified as temporary records. Temporary records are normally destroyed after a fixed period of time or attached to a specific event. For example, once a contract is closed, it can be destroyed after a certain number of years.

Some documents in the Federal inventory can be classified as permanent records. For a document to be classified as a permanent record, it must have historical worth or other value to the Federal Government. When a record is classified as a permanent record the Federal Government must preserve it.

Identifying SFA Records

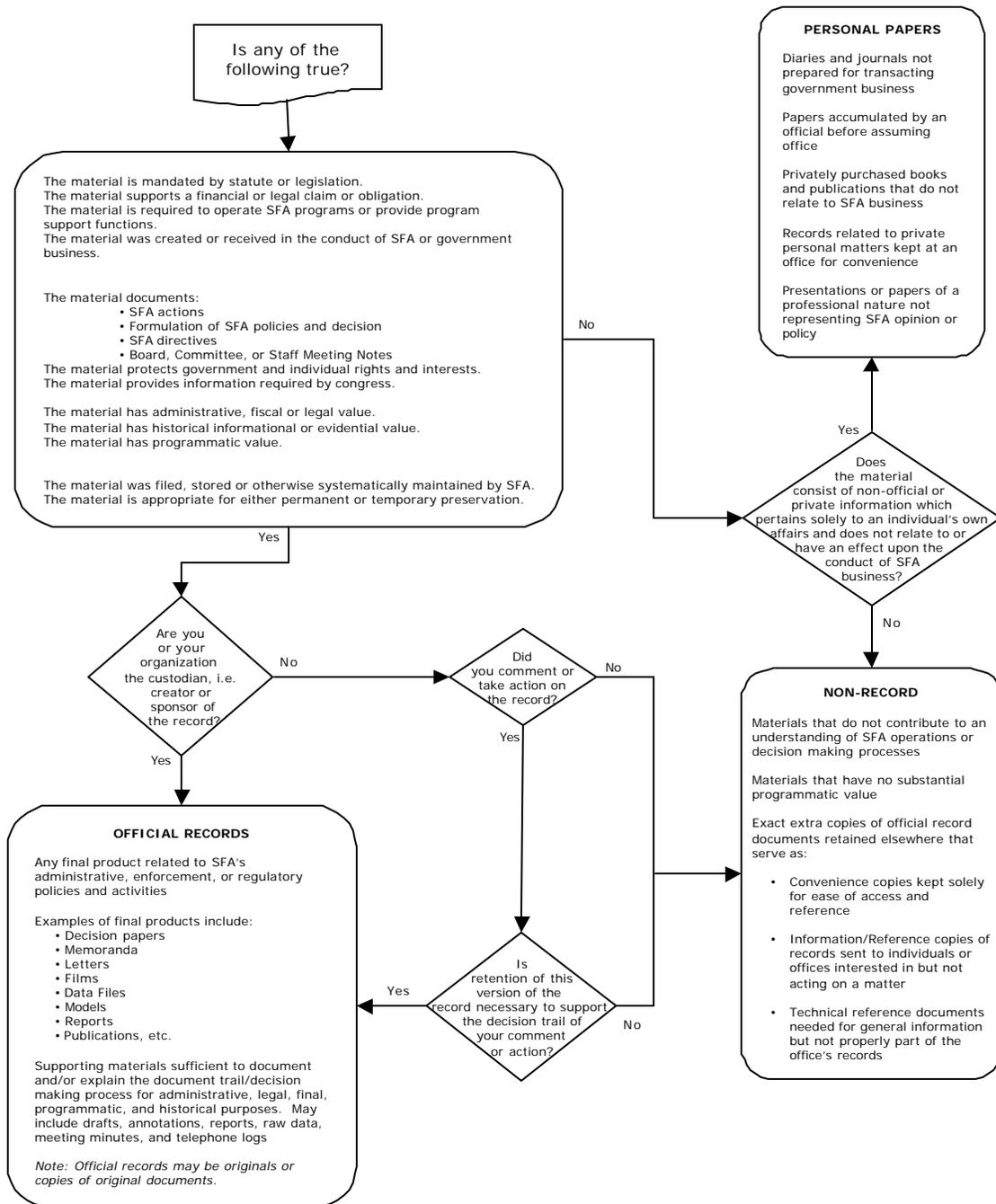


Figure 2-1

3.2 Life Cycle of Records

The retention status of a record relates to the third phase of the record lifecycle, the Disposition phase. The remainder of this section will discuss the disposition of federal records.

3.3 Disposition

Disposition is the final action regarding a record. The final action may be the destruction of a record. Disposition is the key phase of a record's life cycle. All records must have a defined disposition. When a record reaches the end of its life, its fate is determined by the instructions set forth in the records schedule.

3.3.1 Types of Disposition

Once SFA deems that a record is no longer needed to conduct business, the record has entered the disposition phase of the lifecycle. During this phase of the lifecycle, the record is under the control of the formal, approved records schedule. There are three types of dispositions that a Federal record can undergo.

1. Destruction
2. Transfer custody to NARA
3. Transfer to another Federal Agency

Usually records are sent to an agency or a NARA records center for storage. This retention period is defined in the records disposition instructions contained in the schedule. In the case of electronic records, they would be stored off-line on some form of media in a secured environment.

The first type of disposition involves temporary records. Temporary records are destroyed after being retained for a fixed period of time. This retention period may be many years in length. Note that while a record may be in storage at a NARA records center, the record still remains the property of SFA.

The second type of disposition involves permanent records. Records that are of historical value to the United States will be transferred to the National Archives of the United States. Once a permanent record is transferred to NARA, it becomes the property of NARA. This is the only time when NARA takes ownership of a record.

The third type of disposition involves transferring the record from one Federal agency to another. In certain circumstances, a record may be held by one agency but actually belong to another agency. Examples of this are personnel records. The Official Personnel Folders (OPF) will be in the custody of the employing agency, but ownership remains with the Office of Personnel Management (OPM).

3.3.2 Records Disposition Program

A records disposition program should incorporate three primary objectives. The first objective is the prompt disposal of temporary records. These records should be disposed of when the authorized retention period has expired. The next objective should be the timely and systematic transfer of records to an economic, environmentally-safe storage facility. The records stored in this facility are generally no longer needed for use in the office of origin but are not ready for final disposition. The third objective is the identification and transfer of permanent records to the National Archives of the United States. The GRS and the DoEd records schedule are the tools that are used to accomplish these tasks.

NARA issues the General Records Schedule (GRS) for general Government use. The GRS contains the disposition instructions for records that are common to most agencies. The GRS disposition authorities are legally mandatory, and agencies are required to apply the GRS to the broadest extent possible.

The Department of Education is responsible for developing its own records schedule for records that are not in the GRS or are unique to the Department and its programs. This is required by NARA regulations. The Department is also required to schedule the records for a new program within one year of implementation. DoEd must also review its schedule on an annual basis and must revise its schedule within six months after NARA issues a change to the GRS unless NARA grants an exception. SFA should schedule its records as a part of the DoEd's schedule. Any SFA records that are not included in the DoEd schedule must be added to the schedule.

3.4 Basic Steps In Developing a Records Schedule

There are eight basic steps in developing a quality, comprehensive records schedule.

1. Review the functions and record keeping requirements of DoEd
2. Inventory the agency files. This inventory should include both records and non-record material
3. Evaluate records and determine whether they are temporary or permanent records.
4. Draft disposition instructions
5. Organize the draft schedule and clear it internally
6. Obtain necessary approval from NARA and GAO as required by law
7. Implement the approved schedule
8. Review and update the schedule periodically as required by law

Developing SFA records schedules requires coordination among SFA management personnel and staff, DoEd Records Manager, DoEd Office of General (OGC), and NARA and other agencies. When a record needs to be scheduled, an SF 115 must be completed by the requesting office. The SF 115 is submitted to the DoEd Records Manager who coordinates the remaining approval process with NARA and other agencies.

4. WHAT TO DO WHEN A RECORD DOES NOT APPEAR ON A SCHEDULE

4.1 Reasons why a Record is not Scheduled

There are several reasons why a record does not appear on either the GRS or the DoEd schedule. First, the record is not common to all Government agencies so it is not on the GRS. Second, DoEd and SFA may have new programs whose records may not yet have been scheduled. And third, an error was made in not scheduling a particular record.

Whatever the reason may be, it is important to note that although agencies may recommend a particular disposition, it is NARA who determines and approves the final disposition.

4.2 What to do if a Record is not on a Schedule

Before creating the records schedule, an inventory of all documents must first take place. During the inventory, records are separated from non-records and personal papers. SFA must then identify those records that are unscheduled.

SFA creates a records schedule based on specific SFA records. While creating the records schedule, the DoEd records schedule along with the NARA General Records Schedule should be used for guidance or reference. When a specific record does not appear on either schedule, then an SF 115 – Request for Records Disposition form must be completed. The SF 115 is used for scheduling records for disposal, to change their retention period, and for scheduling records as permanent records. The SF 115 is also used to convert unscheduled or permanent records to microform and then destroy the originals. An SF 115 is not required if the originals to be converted to microform are already scheduled.

After the SF 115 is completed, the records manager for DoEd must obtain clearances from the Channel or program offices. The DoEd Records Manager would coordinate the request with NARA. In addition, approval by the General Accounting Office (GAO) might need to be obtained.

There are three general reasons why GAO approval may be necessary.

1. Administrative records are being proposed for retention periods shorter than those approved by GRS 2 through GRS 10.
2. Program records have a proposed retention period of less than 3 years, and
3. They are records relating to claims or demands by or against the Government.

If any of these reasons apply, the DoEd would then request approval from the GAO as well as submitting the SF 115 form to NARA. These actions would also be coordinated by the DoEd Records

Manager. While GAO approval is pending, NARA will continue to process the SF 115 form, but will withhold acceptance until it receives GAO's written approval.

4.3 Instructions on how to complete SF 115

The basic instructions for completing a SF 115 include providing the name of the organization, the contact name and phone number, and the SFA representative's certification. In addition, schedule items and sub-items must be numbered in sequence, describing each item along with its disposition, and indicating for each item and sub-item the previous GRS or SFA schedule number if applicable. Once completed two copies must be submitted to NARA. Attachment E contains a blank SF 115 along with its detailed instructions.

Describing each record along with its disposition is very important to the process of completing an SF 115. The description must be clear and concise in order for NARA appraisers to make appropriate decisions on a record's disposition. The following are some guidelines from *Disposition of Federal Records – A Records Management Handbook* published by NARA:

- Describe and title a series or system by the subject or function
- Consider using a single schedule item to cover several closely related temporary series if the records will have the same retention period. If not, then subdivide the schedule item
- Describe all input records, all information recorded on electronic media, all output records, the documentation associated with the system, and any related indexes. Provide each of these listed above with a particular retention period
- Identify each potentially permanent series as a separate schedule item
- Explain any sampling criteria and procedures for selecting files within a series for permanent retention
- Identify any reports as statistical or narrative and indicate their frequency
- Describe correspondence files more precisely as "program subject," "reading," or the like
- Instead of just using form numbers, use "forms relating to". Otherwise, changing form numbers can void disposition authorization

Also, any additional information associated with each item being described should be provided to NARA for their review. SFA should assess the value of the record, describe its functions, indicate duplication of content, and document the association between the content and information maintained elsewhere in SFA or the Department of Education. Also, if the series supports a Privacy Act system of records, this should be noted as well.

For permanent records the SF 115 would include:

- The initial date
- Arrangement and total volume of each schedule item
- The current organizational location of each series and system

- Transfer date and annual accumulation of recurring records
- Any restrictions consistent with the Freedom of Information Act that are to be imposed by NARA

If non-recurring records are being described in the SF 115 for immediate destruction or transfer to the National Archives, then indicate both volume and inclusive dates, as well as any applicable NARA records center accession and box numbers. Figure 4-1 shows an SF 115 that has been completed and approved.

REQUEST FOR RECORDS DISPOSITION AUTHORITY <i>(See instructions on reverse)</i>		LEAVE BLANK (NARA use only)	
10. NATIONAL ARCHIVES and RECORDS ADMINISTRATION (NARA) WASHINGTON, DC 20408		JOB NUMBER	N1-60-92-1
1. FROM (Agency or establishment) Department of Justice		DATE RECEIVED	10/28/91
2. MAJOR SUBDIVISION Environment and Natural Resources Division		NOTIFICATION TO AGENCY	
3. MINOR SUBDIVISION		In accordance with the provisions of 44 U.S.C. 3303a the disposition request, including amendments, is approved except for items that may be marked "disposition not approved" or "withdrawn" in column 10.	
4. NAME OF PERSON WITH WHOM TO CONFER Ann Sloan	5. TELEPHONE 514-3411	DATE FOR ARCHIVIST OF THE UNITED STATES	1/3/92 <i>James Moore</i>
6. AGENCY CERTIFICATION I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal on the attached ___ page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified; and that written concurrence from the General Accounting Office, under the provisions of Title 8 of the GAO Manual for Guidance of Federal Agencies. <input checked="" type="checkbox"/> is not required; <input type="checkbox"/> is attached; or <input type="checkbox"/> has been requested.			
DATE 10-24-91	SIGNATURE OF AGENCY REPRESENTATIVE <i>Bernard W. Berglund</i> Bernard W. Berglund	TITLE Records Officer Systems Policy Staff Justice Management Division	
7. ITEM NO.	8. DESCRIPTION OF ITEM AND PROPOSED DISPOSITION	9. GRS OR SUPERSEDED JOB CITATION	10. ACTION TAKEN (NARA USE ONLY)
1.	Duplex-numeric Classification 90-1-23, Actions Against the United States Involving Real Property. Disposition: Transfer to WNRC one year after close of case. Destroy 20 years after close of case.	N1-60-88-12, Item 1B(23)	
<i>Copies sent to NN-W NNT, NCF 4/15/92</i>			
115-109 NSN 7540-00-834-4064 PREVIOUS EDITION NOT USABLE		STANDARD FORM 115 (REV. 3-91) Prescribed by NARA 36 CFR 1228	

Figure 4-1

4.4 Other Considerations on Completing the SF 115

One SF 115 can cover the entire SFA, or it can include records from individual Channels within SFA. SF 115s can be submitted by record type or other organizational method. However, the SFA must schedule all of the records, regardless of how many SF 115s are submitted.

Since SFA is a part of the Department of Education, it should apply the DoEd schedule to their records. Where modifications or additions are required, SFA must submit an SF 115. While SFA may not simply apply their records to another agency's Records Schedule, they may, however, use that Department's records schedule as a model in developing their own.

If a new department or new agency is formed and assumes the previous functions or processes from a different agency or Channel, the new entity has 2 years to schedule those records and to submit an SF 115 to NARA.

4.5 What Happens After the SF 115 is Submitted to NARA

Once the SF 115 is submitted to NARA for review and approval, NARA reviews it for completeness and accuracy. It might be necessary for NARA appraisers to consult with the DoEd Records Manager about the records. NARA appraisers may request copies of the physical record or visit an SFA facility or records center to examine these records. After all reviews have occurred, NARA may decide to approve the request or reject the request. If approved, NARA would send SFA a copy of the approved SF 115 and, if necessary, a letter explaining any special steps required to preserve the new record or change the schedule. If rejected, NARA would return the original SF 115 to the SFA with a letter requesting the revisions needed. In most cases, NARA approves the considered opinion of the requesting agency, unless it is in conflict with other schedules or established records management guidance.

5. FILE PLANS

The foundation of a solid records management program is a good file plan. File plans allow for the rapid retrieval, use, and disposition of records. It should be simple, structured, and flexible. It gives an organization uniformity and helps to alleviate ambiguity and confusion.

In developing a file plan three levels of requirements should be kept in mind:

Agency requirements – Provides the overall framework of policies and procedures

Program requirements – Addresses the types of records that document SFA's activities

Series specific requirements – Covers the way the information is maintained

A file plan is a living document. It should be reviewed and updated on a regular basis.

5.1 Record Series

The cornerstone of a file plan is the record series. Business processes generally drive the organization of a record series. In some instances it may be preferable to identify like documents as a series while in other instances a case file approach may be preferable.

A record series is a group of documents or records kept together because:

- They relate to a particular subject or function
- Result from the same activity
- Document a specific type of transaction
- Take a particular physical form
- Have some other relationship arising out of their creation, receipt, maintenance or use

5.2 Developing File Codes

File codes are numbering conventions used to abbreviate lengthy file titles. They give a coherent organization to records and should map to the records schedule.

File codes can be organized in a number of ways. Most effective schemes use a combination of letters and numbers to identify a record series. For example, CORR 351 could be a code that identifies congressional correspondence. The code can be further refined if needed. For example, the 300 series can indicate that it is congressional correspondence. The 50 may specify that it is for the Senate. The 1 can indicate a committee.

The level of detail required to develop file codes is a subjective matter. A balance must be made between the organizational need versus the administrative burden necessary to maintain the plan. Once the file codes are identified, each record series must be assigned a file code.

5.3 Steps towards development

The development of a file plan consists of the following steps.

1. Determine what information is being kept, who has it, and where it is
2. Determine what information should be kept, who should have it, and where it should be kept
3. Separate records from non-record materials
4. Identify each record series, the components of the series, and its retention

5. Assign file codes to each record series

6. RECORDS MANAGEMENT FUNCTIONS

Records management functions are those activities that guide a record through its life cycle. As previously stated, the three basic stages that records go through are: Creation, Use/Maintenance, and Disposition. All three stages of record management are interrelated and affect each other. Within each stage there are various functions that must be performed to properly manage a record. The following information must be identified for proper management of the record throughout the stages:

- Define how long they should be retained
- For final disposition, define whether they should be destroyed or archived
- Define whether the records are of a sensitive nature so they can be properly protected
- Define the appropriate access control so that the records can be properly maintained

Records management activities can be performed in a decentralized manner requiring individual offices to enter and manage their own documents or a more centralized and formal process requiring document submission through a Records Management Office. In either case, records management demands that documents are properly filed and classified so as to allow system users the ability to effectively search and retrieve their material. Filing and classifying documents and records is the bedrock upon which an effective records management program is built.

6.1 Creation Functions

In order to create a record, a document must first enter the system. This document can either be a scanned image, a document created electronically, or a reference to a physical document maintained off-line. These records must be filed and classified in the electronic records management system based upon an established file plan. During classification each record is assigned a file tag. The file tag refers to the file code in the file plan. The file tag provides the system with the records management requirements for that record.

6.1.1 Document Profile Information

Metadata describes the information that is needed to index a document. Examples of metadata are social security number, date, document type, and contract number. When creating a record, metadata is assigned so as to specifically identify and index the item for search and retrieval. This index is also known as the document profile. The more detailed and accurate the information provided in a profile, the easier it is to search for and find a document. Profiles also identify the document for scheduling purposes. Accurate profiles ensure that the record is properly handled by the system. Prior to filing a

document, the end user must determine the profile information for each document so that it can be properly entered during the filing process.

6.1.2 Filing

Filing a document is not the same as saving it. The filing function passes control of the document to the records management system. The records management system for SFA is DoD 5015.2 certified, and provides significant management control and security over the records filed in the system. Filing begins with the user placing a document in the system and adding the appropriate values for the assigned metadata. The ERMS user's guide will provide instructions for properly entering profile data for a record.

6.1.3 Classifying

Classification requires the user to refer to the file plan in order to select the appropriate file code. This selected file code applies the records management actions that will govern the record within the system. Proper classification of record under the file plan allows for the consistent application of a records management program. Improper classification of records will result in the records being archived or destroyed at the wrong time and could lead to potential legal jeopardy.

6.1.4 Security, Retention and Disposition Information

Records management systems approved by NARA require extensive security mechanisms. Access controls are implemented based on document type, record status, and user roles and responsibility. In addition to granting or denying access to view a record, the system can also grant or deny access to selected information regarding a record. For example, the Privacy Act governs control over the use of social security numbers. Only those individuals who have the authority to view social security numbers would be allowed to see them.

When a document exceeds its required retention period, the system will notify the appropriate records management official regarding its status. The system will require an overt action before final disposition can take place.

System-applied retention and disposition is based on the record type and its accompanying classification. Initial security provisions are defined at classification, but may be changed and refined for a record throughout its system life.

Systems designated as DoD 5015.2 compliant maintain detailed audit logs so that administrators can routinely monitor user activity. Audit logs can consume substantial system resources. For this reason, these features are configurable at a system, user, and document level.

6.2 Maintenance and Use Functions

6.2.1 Overview

It is during the maintenance and use stage of a record's life that the search and retrieval functions are performed. For those documents classified as official records, changes to the record can not be made. New versions of a record may be created, but the original record cannot be altered.

6.2.2 Search and Retrieval

Search and retrieval is the most commonly used feature of a records management system. The most commonly used benefit of an ERMS is the search and retrieval function. This capability allows end-users to quickly and easily retrieve documents by entering the appropriate metadata into the ERMS search-engine. The technology used in an ERMS also provides the user with a powerful free-text search capability. As a result, a user can search for a record using either the profile information and/or the content of the record. These systems provide for consistently high-performance document search and retrieval even with millions of documents in the repository. Given that profile searches are faster than free-text searches, it is important to provide accurate profile information during the creation of a record to ensure more efficient search and retrieval. If the correct profile information is not entered into the system, then search and retrieval against that data will be difficult.

6.2.3 Updates

The integrity of the record is of paramount important. Records stored in the records system cannot be changed. If a record must be changed then the old version is retained and a new record is created. The old version may be used as a template for the new; however, at no time will the records management system allow a record to be overwritten with a new version. Editing the contents of an official record is simply not possible in an ERMS.

6.2.4 Maintenance

Once the document is filed into the repository it is under the control of the ERMS and the Records Manager. The maintenance of the records is carried out automatically by the system and where human intervention is required the records manager will perform the necessary maintenance and/or modify system settings so the system performs properly. Maintenance functions include:

- Monitoring and adjusting security settings
- Backup of the system
- Auditing system activities
- Creating new profile templates
- Monitoring system resources

6.3 Disposition Functions

Disposition is the final stage of a record's life cycle. Disposition provides for the archival and destruction of records. Disposition instructions are applied automatically based on the type of record defined during classification. Based on the classification, the system retains the record in the repository for the required time period, and then notifies the Records Manager that a record is ready for final

disposition. The system will not destroy a record without confirmation. In this way, records are retained and disposed of with confidence. Supporting audit logs ensure that SFA meets its legal obligations for retaining and disposing of records. This is a process that the end-user generally does not participate in or see.

7. BACKUP AND ARCHIVAL PROCEDURES

7.1 Backup Procedures

Electronic records management systems should provide the capability to create copies or backups of stored records. Backups of stored records protect the integrity of system data from four possible harmful events:

- System failure
- Operator error
- Disaster
- Willful destruction

Procedures in a comprehensive backup plan include:

- Formulating plans and procedures for creating backups of all records. This should include backup copies of both the record and metadata.
- Consistently following the established plans and procedures for conducting this activity.
- Storing the backup in an offline storage facility
- Providing standard practices for the recovery of records
- Maintain audit logs to revert back to the previously established records state.

7.2 Archival Procedures

There are three basic archival procedures or dispositions. The first is the destruction of temporary records; the second is the archiving of permanent records; and the third involves a change in disposition authority of a record.

The destruction of a record is based on a period of time stated in the retention schedule. Once the temporary record exceeds the retention period, it is destroyed. Physical records are destroyed using various means such as burning or shredding. Electronic media will be destroyed by having their data overwritten. The DoD 5015.2 standard requires that the data be overwritten seven times and so that “virtual ashes” are left behind.

Permanent records are sent to a NARA approved records center or to the National Archives of the United States. Two general criteria govern this procedure:

- The relative importance of the record

- The transfer period

A change in disposition will affect the archiving of a record. Some records may experience a change in filing requirements or a change in the file plan. A record may have a disposition date that is published in a retention schedule. But that date may change because a request to keep that record in service longer than anticipated originally. An example of this situation is when an agency receives a FOIA request

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**Attachment A—SFA Policies and Procedures
(To Be Developed)**

Attachment B—General Records Schedule

Attachment C—Department of Education Records Schedule

**Attachment D—SFA Records Schedule
(To Be Developed)**

Attachment E—SF 115 – Request for Records Disposition Authority

Attachment F—OMB Circular A-123

**Attachment G— 44 U.S.C. 21 National Archives and Records
Administration**

**Attachment H—44 U.S.C. 29 Records Management by the Archivist
of the United States and by the Administrator of General Services**

**Attachment I— 44 U.S.C. 31 Records Management by Federal
Agencies**

Attachment J— 44 U.S.C. 33 Disposal of Records

**Attachment K— Records Disposition Regulations
(36 CFR 1228)**