Records Management Training

Archives, History & Records Office (AHRO)





Why Records Management?



- As a Federal contractor, SLAC has record-keeping responsibilities.
- Benefits:
 - Identify & make readily available information needed
 - Comply with state & federal regulations
 - Reduce operating costs
 - Preserve our corporate memory & scientific research

Records management supports:

- DOE mission and business processes
- public access to government information

What is a Record?



- Made or received by SLAC
- In any form or format (electronic or paper)
- For business transactions or activities
- Evidence of mission, organization, functions, operations, policies and procedures, decisions

Federal records are recorded information, <u>regardless of format</u>, created or received while conducting Government activities.

How to Identify a Record



- Do you need it to prove something did or did not occur? (proof)
- Would an auditor require you to retain it? (audit)
- Could it resolve a dispute in the future?
- Does it support what you do? (supporting documentation)
- Does it have business, legal, scientific, or historical value?

Examples:

- Procedures
- Signed PR's
- Official meeting minutes
- Timecards

What is not a record?



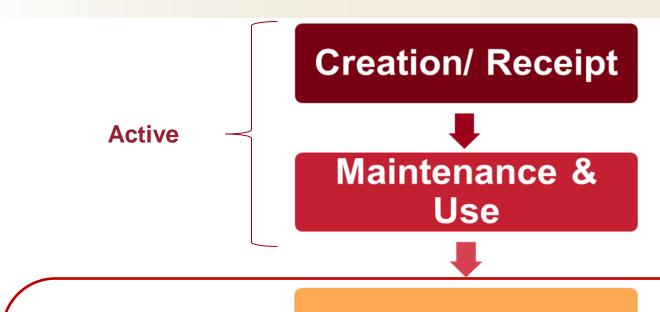
Non-record materials do not meet the conditions of a record.

Examples:

- Duplicate copies
- Drafts (without substantive comments) superseded by final versions*
- Published materials: catalogs, trade journals, etc.
- <u>Personal documents</u>:
 - Accumulated by an employee; not used for business
 - Related solely for an individual's private affairs
 - Should be kept separately from records

Records Lifecycle





Disposition

Inactive







Permanent 2-5%

Temporary 95-98 %

Final disposition

Retention Period



What are Permanent Records?



Permanent Records have historical or other value that warrants permanent preservation.

- NEVER destroyed
- Transferred to National Archives

Examples:

- SLAC Official Publications
- Significant R&D Project Files
 - LCLS, LCLS-II (including financials)
- Organizational charts

Temporary Records



Temporary records have a finite retention period.

- Destroyed/deleted after a NARA-approved retention period
- Can be stored off-site when inactive
- May need to be kept for a very long time
- May require keeping past retention period
 e.g. Legal Hold issued by DOE Office of General Counsel

Examples:

- Employee travel documents
- Accounting reports
- Personnel files

What is a Legal Hold?



A Legal Hold is issued for litigation, audit, federal investigation, FOIA request, etc.

- Suspends normal disposition or processing of all documents described in the Legal Hold, including records & non-records
- Also called:
 - hold order
 - freeze notice
 - **preservation** order
 - suspension order
 - Moratorium



e.g.: DOE EPI Freeze*

^{*}Epidemiological hold on several administrative and environmental records instituted March 1989-present)

Records (Disposition) Schedules

SLAC

- National Archives and Records Administration (NARA)
 General Records Schedules (GRS)
 - for records common to federal agencies
- DOE Records Schedules *NARA-approved*
 - customized to DOE and its Contractors
 - Program Records: unique, substantive functions (e.g. R&D, ESH)

For *authorized*, current schedules, see: SLAC AHRO > Services > Records Schedules https://www.slac.stanford.edu/history/rs.shtml

DEPARTMENT OF ENER Records Disposition Schedule (RDS) 1.1: Financial Ma

Financial Management and Reporting Records documenting the procurement of goods and servic monitoring agencies' net worth, pension, and insurance.

Note: Refer to GRS 1.1 for all other Financial Management and Reporting records not addressed in

Item	Records Description	
010	Contractor Pension Case Files	Continuing Obligation
	Pension plan case files for contractors that includes, but are not limited to:	Cases for which DOE has continued liability for pension plan claims contract completion or terminal
	 pension plans modifications, and amendments 	
020	correspondence reports studies and analyses	No Continuing Obligation Cases for which DOE has no co

<u>Electronic records</u> are created by a computing device, stored on electronic media, and retrievable/machine-readable.

- Subject to records retention requirements just like other records
- ☐ *Context* cross-reference/descriptive
- Complete
- Controls
- Trustworthy reliable, authentic
- Usability

- E-mails qualify as records if they:
- Document policies, decisions, or actions
- Document important meetings (e.g., discuss or attach meeting minutes or agendas)
- Protect the financial, legal, and other rights of the government or persons directly affected by government actions

Note: Personal e-mail accounts should NOT be used for work.

Digitization of Temporary Federal Records

SLAC

- □ Capture <u>all</u> information from original source records
 - all pages/parts
- Ensure <u>use</u> for all purposes served by originals
 - attest to transactions and activities
- Protect against unauthorized changes
- Locate, retrieve, access & use for entire retention period
- Documented Validation Process

See: 36 CFR Chapter XII Subchapter B Part 1236 Subpart D & § 1236.34

Summary



- Most records are temporary
 - NO temporary records can be transferred to the Federal Records Center (FRC) after 2022.
 - The Lab will have to make alternate arrangements for temporary records' storage, retrieval, and final disposition after the 2022 deadline.
- Timely disposition (legal liability/risk)
- Transition to electronic records:
 - identify records
 - separate inactive records
 - periodic review for disposition (e.g. cut off annually)
 - plan for migration

*Please check with AHRO before disposal to ensure compliance with current records schedule(s) and disposal freezes.



SLAC Archives, History & Records Office

https://www.slac.stanford.edu/history/

- transfer inactive records to FRC (2022 deadline)
- transfer permanent records
- answer records management questions

recordsmgmt@slac.stanford.edu



Archives, History & Records Office (AHRO)

http://www.slac.stanford.edu/history/



Records Management (RM) function

- Advises on handling & retention of inactive temporary records—in any format—created in the course of doing business at SLAC
- Ensures compliance with relevant state and federal laws and with DOE records management policies/procedures
- Provides temporary records services;
 Liaison to Federal Records Centers (FRC)

Retention is based on financial, legal, or medical reasons, according to records disposition schedules (RDS) agreed upon by DOE & National Archives and Records Administration (NARA)

Federal Definition of Records Management

SLAC

"The planning, controlling, directing, organizing, training, promoting, and other 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." (44 U.S.C. 2901)

Records Management is the practice of maintaining and preserving records from creation until disposition (when no longer needed for current business).

More Benefits of Records Management

SLAC

- Contributes to the smooth operation by making readily available the information needed for decision-making and operational readiness
- ☐ Helps deliver services in a consistent and equitable manner
- Facilitates the effective performance of program activities
- Protects the rights of citizens, businesses, and the Agency
- Provides continuity in the event of a disaster
- Protects records from inappropriate and unauthorized access
- Helps meet statutory and regulatory requirements
- Provides protection and support in litigation
- Improves office efficiency and productivity
- Provides better documentation more efficiently
- Frees up office space for other purposes by moving inactive records to storage facilities

According to our contract (H.6.O.4.f), SLAC has to maintain all of our records in accordance with:

"36 Code of Federal Regulations (CFR), Chapter XII, -Subchapter B, "Records Management" and the National
Archives and Records Administration (NARA)-approved
Records Disposition Schedules. Records retention
standards are applicable for all classes of records, whether
or not the records are owned by the Government or the
contractor. "

Responsibility

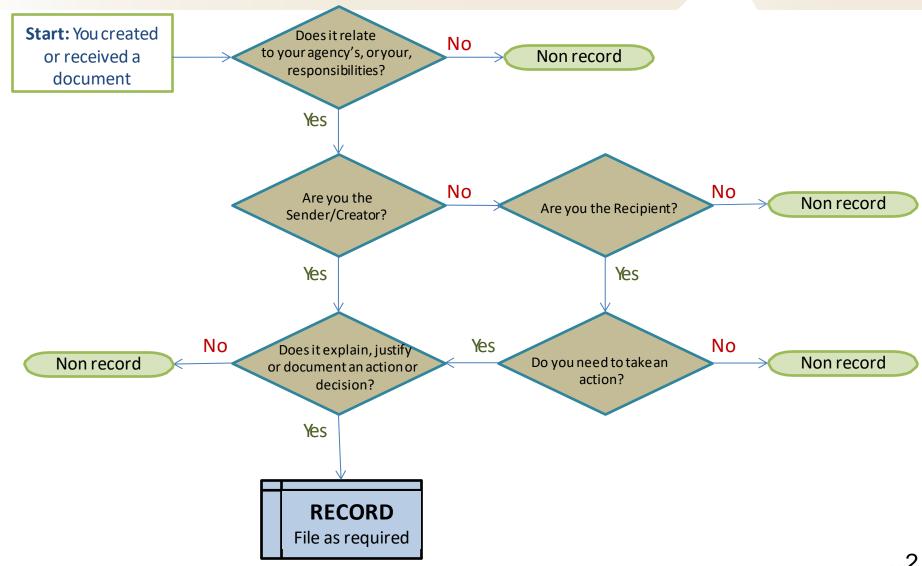


Every federal employee and contractor is responsible for creating, managing, protecting, and disposing of federal records in their custody.

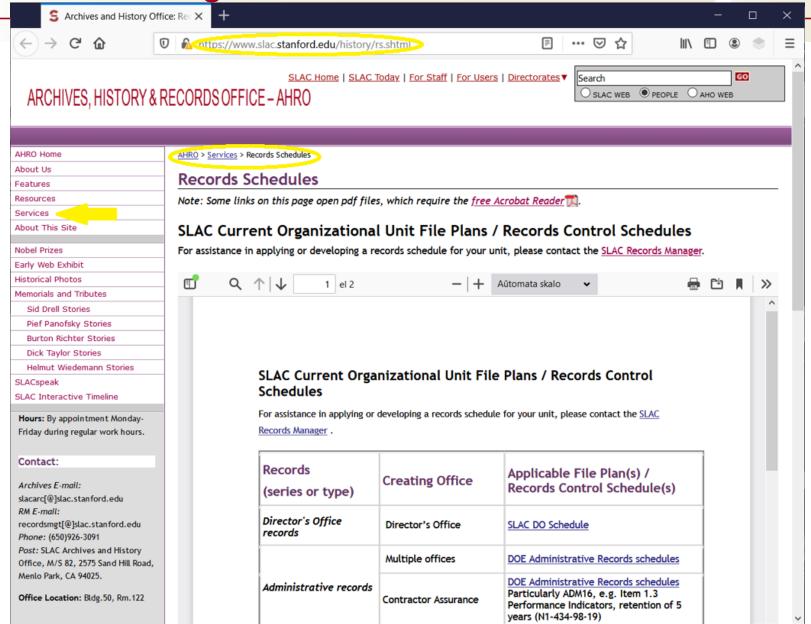
- Unauthorized disposition of Federal records
 - \$2,000 fine
 - 3-year imprisonment
 - or both (18 U.S.C. 2071)

How to Identify a Record (Flow Chart)





Demo: Using Records Schedules



Sample Records under DOE ADM Records Schedules

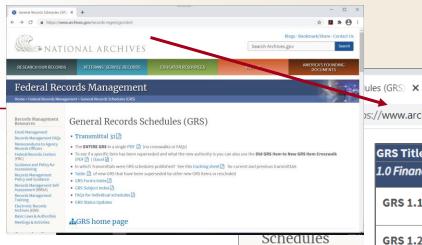
- **Procurement & Supply (DOE ADM 3)**
- Budget (<u>DOE ADM 5</u>)
 - Background (cost statements, rough data, prep materials)
 - Destroy 1 year after close of fiscal year (DOE ADM5 Item 2)
 - **Budget Reports**
 - Annual report 5 years (DOE ADM 5 Item 3a)
 - All others 3 years after end of fiscal year (DOE ADM 5 Item 3b)
- Accounts Records (DOE ADM 6)
 - Audit files (contractors):
 - files/correspondence 10 years
 - work papers 5 years
- Administrative Management (<u>DOE ADM 16</u>)
 - Performance Indicators, e.g. ALP (incl. assoc. data) 5 years

Please check with AHRO before disposal to ensure compliance with current records schedule(s) and disposal freezes.

Records under DOE Programmatic Records Schedules

- Environmental Records
- Research & Development Records
 - Financial documents
 - Budgets
 - Cost runs
 - etc.

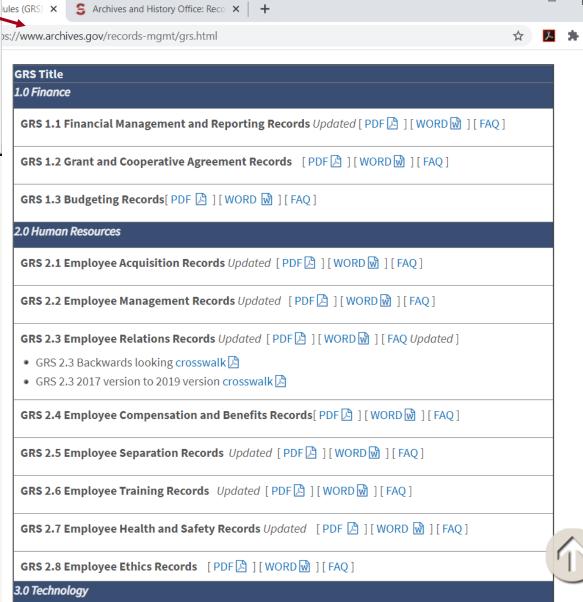
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View the National Archives Operating

Status

Demo: View General Records Schedules



Vital Records



Vital records are records that are essential to the continued functioning of the Department/Agency and its operating units during and after an emergency.

Emergency operating records

 Needed to continue the most critical operating unit functions of the Agency

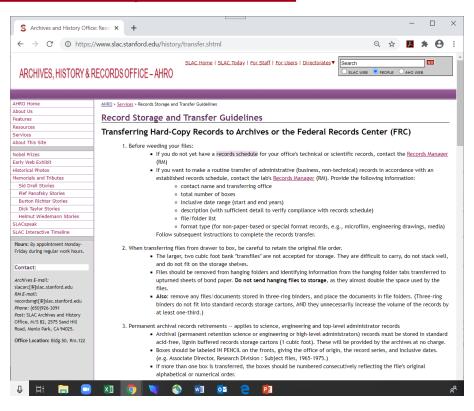
^{*}Business Continuity Plans (BCP) reviewed/updated annually

Records Storage and Transfer Guidelines



- ☐ Transferring Hard-Copy Records to Archives or the Federal Records Center*
- □ Transferring Permanent Electronic Records
- ☐ Temporary Relocation of Current Files
- □ Capturing Departing Employee's Federal Records

www.slac.stanford.edu/history/transfer.shtml



Electronic Information System (EIS) Requirements

SLAC

36 CFR chapter 12 -- specifically 1236.26, and other subsections

- Integrate RM and preservation into implementation of EIS
 - Reliability, Authenticity, Integrity, Usability, Content, Context, Structure
 - Controls
 - Retrievable and Usable throughout retention period
 - Migration to new storage media, formats
 - Plan for migration past life of system
 - Hardware/software/storage media conversion; maintain metadata
- Built-in recordkeeping functionality *DoD-5015.2 STD-certified
 - Declare records
 - Capture
 - Maintain/Use (organize, security, access, retrieve, preserve, audit)
 - Disposition
- Up-to-date EIS documentation
- Storage Media: Area Controls, Test, Sampling, Migration

Cloud Environments



- SLAC would have to be able to demonstrate to DOE and NARA that cloud-based system meets all of the requirements of our contract (36 CFR chapter 12, specifically 1236.26 and other subsections)
- NARA Universal Electronic Records Management Requirements
 (https://www.archives.gov/records-mgmt/policy/universalermrequirements)
 specifies both mandatory and preferred requirements for Cloud Services
- NARA Bulletin 2010-05 also delineates standards and policies that need to be created for records stored in cloud environments https://www.archives.gov/records-mgmt/bulletins/2010/2010-05.html (section 7a-h)
- DOE recordkeeping requirements for records and information maintained in cloud environments are still in development.

AHRO advises the Lab to wait until DOE guidance has been established before moving to cloud solutions for electronic records systems or backup storage.

Recap



What is a record?

• In simple terms, information in any media created or received while fulfilling the duties of your position or conducting official business that evidences Agency functions, organization, and activities

What is records management?

- Contributes to smooth operation of Agency programs
- Protects rights of citizens and Agency
- There are legal consequences for non-compliance

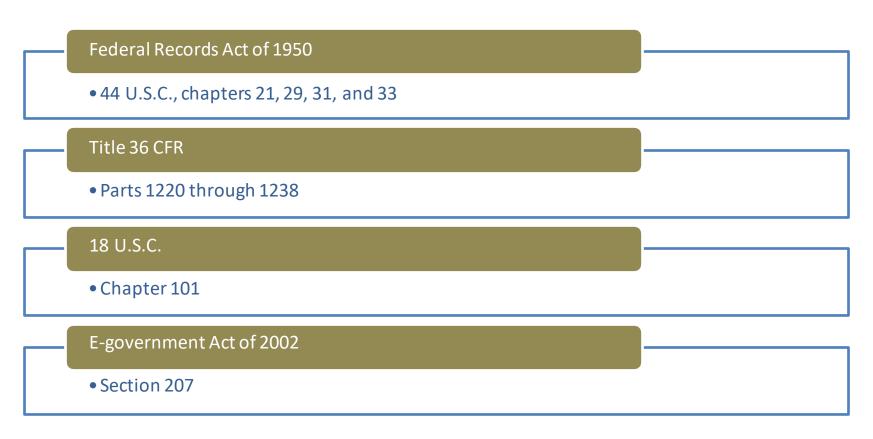
Who is responsible?

• All employees and contractors are responsible for the maintenance of records they create

Statutes and Regulations



Laws and regulations governing federal Records Management include:



A complete list can be found at www.archives.gov/records-mgmt/laws/.

For e-records, see: www.archives.gov/about/laws/egov-act-section-207.html.

References



- Transition to Electronic Records (OMB/NARA M-19-21)
- NARA Strategic Plan, FY2018-2022
- DOE O 243.1b* Records Management Program
- 44 U.S.C. Chapters 21, 29, 31 and 33
- Freedom of Information Act (5 U.S.C. 552)
- Privacy Act (5 U.S.C. 552a)
- 36 Code of Federal Regulations (CFR), Subchapter B, Records Management
- DOD 5015.02-STD Electronic Records Management Application (RMA) Design Criteria Standard, Ver. 2