

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



Records Management for OPM Internal Administrative Records

January 2014

a New Day for Federal Service



Office of Personnel Management

**Records Management
For
OPM Internal Administrative Records**

This document implements OPM's Internal Administrative Records Management Program

Office of the Chief Information Officer, Records Management (OCIO/RM)

January 2014

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Records Management for OPM Internal Administrative Records

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0.16	June, 05, 2013	Joel Westphal, OPM Records Officer edit following another OGC review and comment. All links updated, e-discovery language updated, records freeze information updated, other minor edits. Added info on multiple email accounts.

Executive Summary

This directive contains guidelines for the creation, organization, maintenance, and disposition of OPM records. It implements the requirements of Title 36 Code of Federal Regulations, Subchapter B, Records Management. This directive combines the former OPM Administrative Manual Supplement 44-2, Maintenance of Records (1993) with the former OPM Administrative Manual Supplement 44-3, Disposition of Records (2003).

Where text from these earlier documents was still pertinent to OPM's records management program, those passages were retained in the new Directive. Where records management policy and procedure have changed, we have made every attempt to reflect those changes in the new directive.

New material in this directive includes information on flexible schedules, "big bucket" schedules, and flexible retention periods (see [Subsection 6.10](#)). There is also a substantial amount of new information dealing with the management of electronic records generally (see Section 7), and specifically managing email records, archival PDF images, Web records, and the challenges to records management posed by Web 2.0 and Social Media.

A section addressing the challenges posed by electronic discovery, FOIA, and the records management –related changes to the Federal Rules of Civil Procedure has been added (see [Section 8](#)). Also new is a section on Records Management Training (see [Section 12](#)).

This directive is designed for use as a reference for OPM Records Coordinators (RCs)¹ who are responsible for records management as part of their routine duties. In addition to RCs, other records personnel within individual offices are responsible for adhering to the policies and procedures within this document. This document will help them identify, maintain, retire, transfer, and destroy OPM records. Among the many questions the Records Management Directive answers are the following:

- What is a record?
- How can I tell the difference between a Federal record and a nonrecord?
- How should records be organized for easy access?
- What are the most efficient ways of maintaining records regardless of medium?
- How do I know when to retire records to a Federal Records Center (FRC)?
- How do I know when to destroy temporary records or archive permanent records?

These questions and many more will be fully discussed in this directive. Should you have further questions about records that are not addressed in this directive, please contact the OPM Records Officer in the Office of the Chief Information Officer.

¹ See Glossary entry.

The version of this document that is posted to the Web is the official, authoritative version.

1. INTRODUCTION

All Federal Agencies are required to create, maintain, and destroy or archive their records in an efficient and economical manner. To assist in this endeavor, Federal Agencies are required to establish records management programs.²

OPM's Internal Administrative Records Management Program provides for effective controls over the creation, maintenance, and disposition³ of all Federal records regardless of media. It applies standards and techniques designed to improve records management and records security. Finally, it assists OPM in complying with:

- 44 U.S.C. Chapter 21, National Archives and Records Administration.
- 44 U.S.C. Chapter 25, National Historical Publications and Records Commission.
- 44 U.S.C. Chapter 29, Records Management by the Archivist of the United States and by the Administrator of General Services.
- 44 U.S.C. Chapter 31, Records Management by Federal Agencies.
- 44 U.S.C. Chapter 33, Disposal of Records.

1.1 Purpose

The purpose of this directive is to acquaint Office of Personnel Management (OPM) employees, interns, and contractors with OPM's Internal Administrative Records Management Program and the importance of records management at OPM. It details the policies, procedures, roles and responsibilities, standards, and techniques that OPM uses to manage its internal administrative records.

1.2 Scope and Applicability

The scope of this directive is the life-cycle management of:

1. OPM internal administrative records, and
2. OPM personnel and employment-related records that pertain only to OPM and OPM employees.

1. **OPM internal administrative records:** Internal administrative records are records created and received by OPM during the normal course of business and that pertain to the day-to-day functioning of the agency.

2. **OPM internal personnel records:** Although it is OPM's responsibility to manage all three types of Federal personnel records (internal systems of personnel records, centralized systems of personnel records, and Government-wide systems of personnel records)⁴ only the first type (OPM internal personnel records) are covered by this directive.

² See [44 U.S.C. 3101 – 3102](#).

³ See Appendix B, Glossary, for the definition of "disposition".

⁴ See [5 CFR 297.104](#), OPM's Privacy Procedures for Personnel Records – Types of Records.

For policy and procedure on centralized systems of personnel records and Government-wide systems of personnel records, please see the [Guide to Personnel Recordkeeping](#).

All OPM employees, interns, and contractors create or receive OPM internal administrative records during the course of their daily work. This directive applies to all OPM employees, interns, and contractors.

1.3 Compliance, Enforcement, and Exceptions

The heads of all Federal Agencies must establish programs for the economical and efficient management of the agency's records, as demanded by [44 U.S.C. 3102 Establishment of program management](#).⁵ Agency records management programs must comply with 44 U.S.C. Chapters

- [21](#) (National Archives and Records Administration),
- [25](#) (National Historical Publications and Records Administration),
- [29](#) (Records Management by the Archivist of the United States), and
- [31](#) (Records Management by Federal Agencies).⁶

They are also expected to comply with [36 CFR Chapter XII, National Archives and Records Administration](#) and [41 CFR Part 102-193, General Services Administration \(GSA\) - Creation, Maintenance, and Use of Records](#).

Enforcement of these statutes and regulations is expected to be undertaken by agency heads and their records officers. In addition, both the National Archives and Records Administration (NARA) and GSA encourage compliance by requiring that agency heads report on how their records management programs comply with the statutes and regulations. Annually, NARA and GSA obtain status reports from agencies, and follow-up with the agency head when programs are not in compliance and corrective action is necessary. If an agency does not comply in a timely manner, then the Archivist and GSA are required to report to Congress or the President detailing failures of compliance by Federal Agencies.⁷

While there are exceptions in the regulations pertaining to specific aspects of records management activities and programs, there are no exceptions to the responsibility of Federal Agencies to establish and maintain a records management program.

1.3.1 Criminal Penalties

The heads of Federal agencies are responsible for ensuring that all employees are aware of the provisions of the law relating to unauthorized destruction, alienation, or mutilation of records, and should direct that any such action be reported to them. Criminal penalties may be incurred for the unauthorized removal, mutilation, or destruction of Federal records.

⁵ See [44 U.S.C. 3102](#).

⁶ See [44 U.S.C. 3102\(3\)](#).

⁷ See [44 U.S.C. 2115 Reports; correction of violations](#).

These penalties are defined in 18 U.S.C. 2071, Concealment, removal, or mutilation [of records] generally and 36 CFR 1228.102, Criminal penalties. Penalties include a fine or prison sentence of not more than 3 years, or both.

1.3.2 Reporting

The head of a Federal agency shall report any unlawful or accidental destruction, defacing, alteration, or removal of records in the custody of the agency to NARA. The necessary elements of the report are outlined in 36 CFR 1228.104.

2. RESPONSIBILITIES

OPM uses a decentralized filing system for its internal administrative records. This means that some files are located in working areas rather than a central location such as a specific OPM office or facility. Responsibility for the administration and implementation of the records management program belong to the OPM Director, the Chief Information Officer (CIO), the OPM Records Officer (RO), and the Records Coordinators (RCs). However, all OPM employees, political employees, interns, and contractors are responsible for managing the documents (records and non-records) they create and receive.

2.1 OPM Director

The Director is responsible for making and preserving records that document the organization, function, policies, and decisions of the agency (44 U.S.C. 3101). The Director is also responsible for establishing an active and continuing program for the management of agency records (44 U.S.C. 3102). In addition to these basic responsibilities, the Director is required to remind all OPM employees annually of the agency's records management policies and of the sanctions for the unlawful removal or destruction of Federal records, as provided in 18 U.S.C. 2071 (Concealment, removal, or mutilation [of records] generally).⁸ The Director of OPM has delegated the administration and implementation of the internal administrative records management program to the Chief Information Officer.

2.2 The CIO

The CIO or designee is responsible for administering and implementing all rules, regulations, policies and procedures related to records management regardless of medium (paper and electronic). The CIO has responsibility for ensuring that information technology systems provide adequate and cost effective records management and retention capabilities. As information systems are planned, the CIO will:

- Ensure that the Records Officer and appropriate program area and field office Records Coordinators are included in the initial planning for new systems, and plans for migration or updates from existing systems;
- Provide guidance on the security of electronic records over the life of the records, and ensure that Records are valid, authentic, and reliable in order to meet legal requirements.

⁸ See also [36 CFR 1222.20\(b\)\(9\)](#) and [36 CFR 1228.100\(b\)](#).

2.3 Records Officer (RO)

The Records Management (RM) organizational unit, located in the Office of the Chief Information Officer, is responsible for the overall direction of OPM's Internal Administrative Records Management program. The RO is designated by the Chief of Records Management, who in turn is responsible to the CIO. The RO is responsible for:

- Serving as OPM's representative with NARA, other Federal Agencies, and external organizations on matters pertaining to records management.
- Developing plans, policies, and standards governing the maintenance and disposition of all OPM records in all media and formats.
- Approving any directives by program offices that supplement the prescribed records management-related instructions contained in this directive.
- Evaluating the records management program to ensure its adequacy, effectiveness, and efficiency.
- Providing leadership and guidance to the Records Coordinators (RCs) in OPM's program areas and field offices to ensure reasonable uniformity in records management activities throughout the agency.
- Developing agency-wide policies, standards, and procedures for records management by:
 - (a) Developing and implementing management systems and procedures to ensure that officials, staff, and contractors do not remove Federal records from OPM custody without appropriate authorization.
 - (b) Establishing procedures for the participation of RCs, and others with records management duties, in developing new or revised agency programs, processes, systems, and procedures to ensure that adequate recordkeeping requirements are established and implemented.
- Ensuring that all OPM RCs, senior officials, employees, interns, and contractors are given training in records management and are aware of OPM records management policies and the possible sanctions for the unlawful removal or destruction of Federal records.
- Reporting any unlawful or accidental removal, defacing, alteration, or destruction of OPM records to the CIO and NARA (44 U.S.C. 3106).
- Conducting reviews of Headquarters and field office programs to ensure conformance with Government-wide and agency-wide records management standards.

2.4 Records Coordinators (RCs)

RCs are designated by the OPM Records Officer, or by the Program Managers with the approval of the RO. They are responsible for records management in Headquarters program areas and in field offices. The names of RCs, and any changes in their designation, must be reported to the OPM Records Officer immediately. The RCs are responsible for:

- Developing and maintaining the program area and field office records management program in conformance with OPM's policies and standards.
- Establishing and implementing procedures to ensure that officials, employees, interns, and contractors do not remove records from OPM custody without prior authorization.
- Ensuring that adequate recordkeeping requirements are established and implemented for new or revised programs, processes, systems, and procedures.
- Conducting annual reviews of inventories and file plans to ensure that adequate and proper documentation is maintained, permanent records are preserved, and other records are destroyed in accordance with applicable schedules. Reporting to the RO on the results of this review.
- Assisting the RO in administering the records management program to ensure reasonable uniformity throughout OPM. Providing the RO with information and documentation requested for annual evaluation of the program area and field office records management program.
- Reporting any unlawful or accidental removal, defacing, alteration, or destruction of OPM records to the RO.
- Ensuring that employees are aware of records management responsibilities and established recordkeeping requirements.

2.5 Agency Employees, Interns, and Contractors

ALL OPM employees, interns, and contractors are responsible for managing the documents (records and non-records) they create and receive in accordance with OPM's internal administrative records management policies, procedures, and applicable external regulations as stated in this directive.

OPM employees also are responsible for following all instructions and guidance provided by the OPM Records Officer and their Records Coordinator.

At the most basic level, it is the responsibility of all OPM staff to knowing that Federal records are:

- Recorded information created by employees, interns, and contractors in the course of agency business.

- Recorded information received by employees, interns, and contractors requiring them to act or make decisions relevant to agency business.
- Recorded information documenting acts and decisions made by employees, interns, and contractors in the course of agency business.

All OPM employees, interns, and contractors create and receive Federal records and must have some knowledge of the records management policies and procedures employed by OPM. Therefore, they are responsible for managing the records necessary to document the agency's official activities and actions in accordance with policy and procedures in this document and corresponding references.

2.6 Senior Officials and Political Appointees

All Federal employees are responsible for creating and preserving records that adequately and properly document "the organization, functions, policies, decisions, procedures, and essential transactions of the agency."⁹ However, senior officials¹⁰ (the Director, deputy directors, associate directors, deputy associate directors, etc.) must be especially mindful of their records management responsibilities. Many of the records created or received by senior officials are considered permanent because they document OPM's decisions and policies. NARA has determined that the records of senior officials have sufficient value to warrant archival preservation.¹¹

Federal agencies are mandated by 44 USC 3101 to provide annual information management training to Executives and Managers. The training will not only assist in compliance, it also boosts the overall score that determines whether or not OPM is at high risk, medium or low risk for records mismanagement and alienation of Federal records. OPM has to submit an annual Self-Assessment to the National Archives and Records Administration to verify whether executive training did occur. Data evaluating compliance is thereafter included in a report to Congress and the Office of Management and Budget.

In addition to the records management responsibilities pertaining to other employees, senior officials are responsible for:

- Creating records necessary to document the actions taken and decisions made by them, or on their behalf, in the course of agency business.
- Securing records before they leave the agency.
- Understanding that all records created and received during their tenure belong to the Federal Government.

⁹ See [44 U.S.C. 3101](#).

¹⁰ For a list of senior officials compiled by NARA, see the General Records Schedules (GRS): Note following [GRS 23, Item 5a](#).

¹¹ See [Disposition of Federal Records \(DFR\): A Records Management Handbook, Appendix C, Appraisal Guidelines for Permanent Records](#).

Senior officials typically manage the following records:

- Calendars, schedules, and logs of daily activities.
- Records created and received while serving on committees, including Federal advisory boards, councils, and interagency and external committees.
- Records that document the development of OPM policies and programs.
- Reports to Congress, the President, or both.
- Speeches and testimony.
- Major correspondence.

2.7 New Employees, Interns, and Contractors

All new employees, interns, and contractors at OPM must obtain records management training to ensure they know the difference between Federal records, nonrecords, and personal papers, and are aware of OPM records management policies and the possible sanctions for the unlawful removal or destruction of Federal records. This requirement is mandated by 36 CFR 1228.100.

2.8 Human Resources

In conjunction with the RO, Human Resources is responsible for allotting training time in their new hire orientation for records management training.

3. RECORDS MANAGEMENT POLICY

It is the policy of the Office of Personnel Management (OPM) to establish and adhere to an efficient and economical records management program for its internal administrative records and those personnel records that pertain only to OPM employees. The policy applies to all OPM employees, interns and contractors and is mandatory guidance for information lifecycle management. Unauthorized deviation from the policy puts OPM at risk for sanctions.

The purpose of the policy is to:

- Ensure compliance with all relevant Federal statutes and regulations.
- Preserve the rights of the agency and its employees.
- Support effective decision-making.
- Minimize litigation risks by ensuring that:
 - i. employees, interns, and contractors are properly trained in their roles and responsibilities for creating, maintaining, retiring, and destroying records at OPM, and
 - ii. the systematic and routine destruction of temporary records takes place.
- Reduce operating costs through control over the creation, storage, destruction of temporary records, and transfer of ownership of permanent of records to NARA.

- Safeguard vital information.
- Preserve organizational memory.
- Preserve primary historical documents.

3.1 Records Life-Cycle Process

The records life-cycle process focuses on managing records from their creation through their maintenance, use, and disposition.

According to this process, records go through three basic phases (see Figure 1 below):

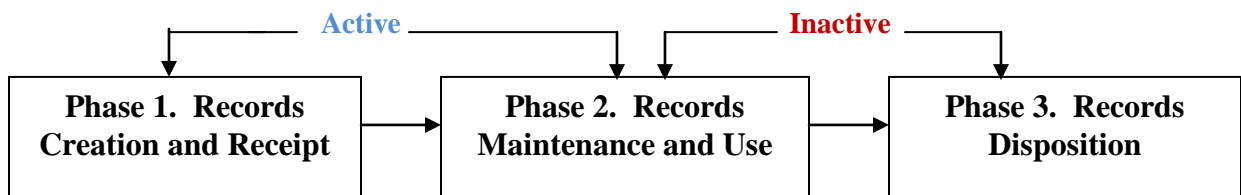


Figure 1: Records Life Cycle

Recorded information created or received in the course of agency business make up the Records Creation and Receipt phase of the records life cycle. As soon as the record is filed in a file drawer or on a shelf, it enters the Records Maintenance and Use phase. As figure 1 indicates, active records are those captured in the Records Creation and Receipt phase and extending into the Records Maintenance and Use phase. At some point during the Records Maintenance and Use phase, the records cease to be active and become Inactive Records.¹² At this point, it is common for agencies to retire their records to a Federal Records Center. At the end of the Maintenance and Use phase, the record is determined to be of no more use to the agency. It is then transferred to NARA if that agency has decided that the records are of permanent, or archival, value. If the records are temporary, they are destroyed.

3.2 Records Management Fundamentals

Records management is the planning, controlling, directing, organizing, training, promoting, and other managerial activities involving the life cycle of records regardless of media.

All Federal employees, interns, and contractors create and use Federal records. They may be in any medium or format. Records document the organization, functions, policies, decisions, procedures, operations, and other activities of the agency.

There are rules governing the creation, receipt, use, and disposition of all Federal records. It is the responsibility of all Federal employees, interns, and contractors to protect Federal records in their custody, and there are legal implications for destroying records without the proper

¹² See Appendix B, Glossary, for the definitions of “active records” and “inactive records”.

authority. In addition, following good records management practices benefits OPM by improving access to information and saving time, space, and money.¹³

Below is an overview of OPM's Records Management Program:

- Records Identification – identifying and separating records from nonrecords and personal papers.
- Records Classification – categorizing the records in an office or agency so that they are recognized as correspondence, reports, contracts, financial records, among other classifications.
- Series Inventory – a listing of all agency records by record series.¹⁴
- File Plan¹⁵ – a listing of all agency records by folder.
- Records Maintenance – ensuring that OPM has a recordkeeping system that makes it easy to locate records while guarding against their unauthorized removal, mutilation, or destruction.
- Records Retirement – ensuring that inactive records are retired to a Federal Records Center, freeing up more expensive OPM space.
- Records Disposition – transfer of ownership of permanent records to NARA when they are no longer needed by OPM. It is also the orderly and timely destruction of temporary records.

3.2.1 Third Party Records Management of Federal Records

The following standard items relate to records generated in executing the management of Federal records by a third party contractor. The NARA highly recommends language such as this should be included in a typical Electronic Information Systems (EIS) procurement contract:

- Citations to pertinent laws, codes and regulations such as 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 CFR Part 1222 and Part 1228.
- Contractor shall treat all deliverables under the contract as the property of the U.S. Government for which the Government Agency shall have unlimited rights to use, dispose of, or disclose such data contained therein as it determines to be in the public interest.
- Contractor shall not create or maintain any records that are not specifically tied to or authorized by the contract using Government IT equipment and/or Government records.

¹³ See Environmental Protection Agency's [What Every EPA Staffer Should Know About Records Management](#).

¹⁴ See Appendix B, Glossary, for the definition of "record series" and "series inventory". See also DFR, Chapter III Records Inventory (NARA: 2000).

¹⁵ See Appendix B, Glossary, for the definition of "file plan". See also DFR, Part VI Schedule Implementation (NARA: 2000).

- Contractor shall not retain, use, sell, or disseminate copies of any deliverable that contains information covered by the Privacy Act of 1974 or that which is generally protected by the Freedom of Information Act.
- Contractor shall not create or maintain any records containing any Government Agency records that are not specifically tied to or authorized by the contract.
- The Government Agency owns the rights to all data/records produced as part of this contract.
- The Government Agency owns the rights to all electronic information (electronic data, electronic information systems, electronic databases, etc.) and all supporting documentation created as part of this contract. Contractor must deliver sufficient technical documentation with all data deliverables to permit the agency to use the data.
- Contractor agrees to comply with Federal and Agency records management policies, including those policies associated with the safeguarding of records covered by the Privacy Act of 1974. These policies include the preservation of all records created or received regardless of format [paper, electronic, etc.] or mode of transmission [e-mail, fax, etc.] or state of completion [draft, final, etc.].
- No disposition of documents will be allowed without the prior written consent of the Contracting Officer. The Agency and its contractors are responsible for preventing the alienation or unauthorized destruction of records, including all forms of mutilation. Willful and unlawful destruction, damage or alienation of Federal records is subject to the fines and penalties imposed by 18 U.S.C. 2701. Records may not be removed from the legal custody of the Agency or destroyed without regard to the provisions of the agency records schedules.
- Contractor is required to obtain the Contracting Officer's approval prior to engaging in any contractual relationship (sub-contractor) in support of this contract requiring the disclosure of information, documentary material and/or records generated under, or relating to, this contract. The Contractor (and any sub-contractor) is required to abide by Government and Agency guidance for protecting sensitive and proprietary information.

3.2.2 Identifying and Classifying Records

Records identification takes place when the OPM employee or contractor determines that a document or other recorded information matches the definition of record found at 44 U.S.C. 3301. This simple step also has the effect of separating the record identified from all nonrecords. Once the records have been separated from nonrecords, the process of classification along business function lines and document type can begin (see Subsections 6.2 and 6.3 below).

3.2.3 Series Inventory and File Plan

Once records have been classified, the Records Officer and all Records Coordinators must inventory them. A records inventory (in this directive referred to as a “series inventory”) is simply a listing of all the record series in the office. Once all office inventories are completed, the Records Officer combines them into an inventory of all of OPM records.

After completing the inventory, each office must create a file plan. The difference between a series inventory and file plan is that a series inventory results in a list of record series, whereas a file plan is a listing of agency records down to the folder level. See Subsection 6.4 below for details.

3.2.4 Records Scheduling

The process of creating a records inventory and file plan aids in records scheduling. A records schedule describes a group of related records and documents its disposition instructions and retention period. All records schedules must be approved by NARA. Most of OPM's schedules are based on NARA's General Records Schedules, which are applicable to all Federal Agencies. See [Section 6, Records Disposition](#) for details.

3.2.5 Records Maintenance and Use

The period during which a record is needed for the conduct of OPM business is its period of maintenance and use. During this period, the record legally belongs to OPM even if the record is no longer stored in OPM space. During this period, OPM employees, interns, and contractors must ensure that the record is safe and secure. See [Section 5, Records Maintenance and Use](#) for details.

3.2.6 Records Retirement

The Maintenance and Use phase of a record's life cycle is sometimes divided into two periods: an active period and an inactive period. According to NARA's definition, active records are referenced at least once a month, and inactive records are referenced less often. Agencies often retire their inactive records to Federal Records Centers (FRCs). The FRC has custody of the record, not ownership, while it is stored at the FRC. See [Section 6, Records Disposition](#) for details.

3.2.7 Records Disposition and Retention

A record's disposition defines its status as a temporary record that is eventually destroyed, or a permanent record that is archived. A record's retention period is the period of time during which the record is needed for agency business, after which it is either destroyed or archived. See [Section 6, Records Disposition](#) for details.

4. RECORDS CREATION AND RECEIPT

Federal employees, interns, and contractors create and receive many documents in many media and formats on a daily basis. The first lesson of records management is to identify which types of documentary materials are records and which are not.

The statutory definition of a "Federal record" can be found at [44 U.S.C. 3301](#). To paraphrase, Federal records are *documentary materials regardless of physical form or characteristics, which are made or received by an agency of the United States Government, and preserved and appropriate for preservation as evidence of actions taken or decisions made by or on behalf of*

the United States Government. This can be simplified still further. A Federal record is any recorded information that is:

- Created in the course of agency business,
- Received for action in the course of agency business, or
- Preserved to document actions taken or decisions made in the course of agency business.

4.1 Controlling Records Creation and Receipt

To maintain an economical and efficient records management program, agencies must be concerned with maintaining some control over how records are created and received. Federal employees, interns, and contractors can begin to establish control first by remembering that not every document they encounter is a Federal record.

Many types of recorded information do not meet the statutory definition of “Federal record.” These materials are defined in the Code of Federal Regulations as “nonrecords”. According to this definition, nonrecords are federally owned recorded information that does not meet the criteria of a Federal record. Excluded materials are extra copies of documents kept only for reference, stocks of publications and processed documents, and library or museum materials intended solely for reference or exhibit.¹⁶

This definition would also include printed copies of electronic records, where the electronic record is considered the original. However, where agencies have not yet established an email records management system, it is still necessary to print out email records. In this instance, the printed copy is the record (see Section 7 of this directive).

Having a sound knowledge of what recorded information constitutes a Federal record and what does not makes it possible to control the size of an office’s records collection. Performing a series inventory is a good opportunity to separate records from nonrecords and personal papers. Records Coordinators and others with records management duties must develop procedures for managing their nonrecords. This can be accomplished by controlling records accumulation and destroying nonrecords as soon as they are no longer needed.

4.1.1 Nonrecords

Nonrecord material consists of extra copies, drafts, directives (in other than the originating office), periodicals, and convenience copies of Federal records. The fact that they are nonrecords does not necessarily mean that they are not scheduled. Many nonrecords are scheduled, but they usually have retention periods that are either very brief or very flexible. Such schedules often state that the nonrecord must be destroyed “when no longer needed”.

As indicated previously, it is very important that nonrecords and records be kept separate in the files. Such nonrecords as professional journals, periodicals, and other reference materials can

¹⁶ See [36 CFR 1220.14, Records Management – General definitions](#).

accumulate rapidly. It is important that these materials be destroyed when no longer needed. For examples of nonrecords, see [36 CFR 1222.34\(f\)](#).

4.1.2 Personal Papers

Personal papers are documentary materials of, or belonging to, private individuals or entities. Because they can be created and received by Federal employees, interns, and contractors, it is sometimes easy to mix them with Federal records. However, such materials are not created and received in the course of, or pursuant to, Government business. They are not Federal records and, like nonrecords, must be segregated from Federal records and destroyed at the earliest opportunity. For examples of personal papers, see [36 CFR 1222.36](#).

5. RECORDS MAINTENANCE AND USE

In Federal usage, records are described as “active” or “inactive,”¹⁷ depending on the stage they have reached in their life cycle. These terms refer to the use of records in the daily work of the office. NARA has defined active records as those records that are referenced at least once a month, while inactive records are those referenced less than once a month.

It is often desirable to move inactive records offsite, usually to a Federal Records Center (FRC), to free up agency space and take advantage of cheaper FRC space.¹⁸ The maintenance of inactive records “retired” to an FRC becomes the FRC’s task, although the costs associated with the performance of this task are borne by OPM. OPM may store records in agency-operated and commercial storage facilities, but such facilities are required to meet NARA standards as stated in [36 CFR Subpart K Facility Standards for Records Storage Facilities](#).¹⁹

Because of their frequency of reference, it is usually to an agency’s benefit to keep active records in agency storage. It is the agency’s task to maintain these records and keep them safe from loss or damage for the length of time indicated by their associated retention periods.

5.1 Records Maintenance Responsibilities

OPM uses a decentralized filing system. This means that the files are located in work areas rather than in a central location. In a decentralized system, it is the responsibility of everyone using the files to maintain the files.

While the Records Officer and the Records Coordinators are ultimately responsible for records maintenance, OPM employees, interns, and contractors who make greatest use of OPM records bear the largest responsibility for ensuring that the records are properly maintained. They must notify their RC if they notice such things as misfiles or over-packed filing drawers.

¹⁷ Some sources use the terms “current”, “semicurrent”, or “noncurrent”. See [DFR, Chapter III, Figure 3-1a](#).

¹⁸ See the [OPM Records Schedules](#) (currently being revised) for specific instructions regarding whether and when specific record series should be retired to the FRC.

¹⁹ See [36 CFR 1228.150](#) for authority to store records in commercial facilities; [36 CFR 1228.150-1228.156](#) for transfer of records to storage generally; [1228.160-168](#) for transfer of records to NARA facilities; and [1228.220-244](#) for storage facility standards.

Many of OPM's files have not been indexed into a database. Therefore, if folders are misfiled, the only way to find them is if they are noticed by alert employees or during periodic shelf audits. To avoid this problem, each office must establish file stations (see [Subsection 5.2.4](#) and Figure 4) supplied with charge out records listing folders that have been removed by employees.

Over-packing drawers and shelves is one of the easiest ways to damage paper records. The repeated pulling out and pushing in of over-packed file drawers shreds the edges of paper records and causes loss of information.

This sort of damage can be easily avoided. Periodically auditing file shelves and drawers soon brings problems to light. A plan for the periodic retirement of inactive records also frees up agency filing space and avoids over-packing of shelves and drawers.

5.2 OPM Files – Electronic and Other Media

It is important to understand that OPM files are anywhere where OPM's records are stored and managed. The "files" are predominately electronic files located on servers, backup tapes, personal computers, laptops, tablets, shared and private drives. However OPM also maintains files in other media and may be located in a large room full of filing cabinets, a file cabinet or two located in a small office or cubicle, or a file drawer in an employee's or contractor's desk. No matter where the records are kept, they are a part of the OPM records system, and are subject to the requirements of the OPM records management program. Remember that personal files that do not contain any official record copies or working papers are not considered part of OPM's files. It is each employee's responsibility to separate personal files from Federal records. In the case of records that contain some personal information mixed with OPM-related information, it is the employee's responsibility to extract the OPM-related information and file it appropriately.

Records Coordinators are responsible for being aware of the location and content of all the files in their offices, and for periodically reviewing the files to ensure that they are being maintained in accordance with OPM records management policies and procedures and U.S. Government statutes and regulations.

As a general rule, documents are filed in the record collection of the organizational component that originated the document. The record copy of a letter originating in office A and sent to office B must be filed in office A. Offices may vary this general rule as long as all persons involved are aware of the system being followed.

Some records are of concern to more than one office. To prevent fragmenting the record, the OPM Records Officer and the responsible Records Coordinator from one of the offices involved must assign responsibility for the records. Fragmentation can easily occur when more than one office is assigned responsibility for a particular function or project. The records documenting the project will be created and received by both offices. In this situation, decisions or judgments may be made on the basis of incomplete information since each of the offices has only a portion of the complete record.

Employees and contractors may not maintain OPM records at their individual workstations. These files are usually not maintained in accordance with accepted OPM records management

guidelines, they are often known only to the employee, and they frequently disappear when the employee leaves the office.

It is necessary, of course, for employees, interns, and contractors to maintain copies of records relating to projects in which they are actively engaged. Once these projects are completed, however, employees must turn these records over to the Records Coordinator for filing in the office's records collection. RCs must remind employees, interns, and contractors working in their offices of this requirement.

5.2.1 Organizing Files

OPM files must be organized by records schedule titles wherever possible. The program records schedules approved by NARA have set titles that cannot be changed without authorization. The General Records Schedule published by NARA also has set titles. Use of appropriate titles facilitates proper records disposition.

All of OPM's schedules are broken down into disposition items, sometimes called "record series." These are smaller groups of records with the same disposition and retention period. For instance, schedule ADM has 26 disposition items. In addition, many disposition items are broken down into sub-items. Schedule ADM, Item 2 has three sub items: 2a, 2b, and 2c. For filing purposes, ADM, Item 1 records must be filed before ADM, Item 2 records, and ADM, Item 2a records before ADM, Item 2b records (see Subsection 6.5 Records Schedules).²⁰

Within this general scheme, records can be filed either chronologically or alphabetically as suits the business practices of the individual office and the types of records that the office maintains.

Electronic file folders throughout the agency should have a consistent taxonomy. Records taxonomy is a documented and orderly set of types, classifications, categorizations and/or principles that are often achieved through mechanisms including but not limited to naming, defining and/or the grouping of attributes, and which ultimately help to describe, differentiate, identify, arrange and provide contextual relationships between record items, entities or types.

5.2.2 File Breaks and Cutoffs

The instructions accompanying schedule disposition items often tell you when to "break" or "cut off" the files. Breaking the files means keeping the files from becoming unmanageable by stopping at a convenient place -- usually the end of a fiscal or calendar year -- and starting a new file. The application of the records disposition schedules is made easier using these breaks.

If, for example, a file is to be destroyed 2 years after the close of the fiscal year, a new file must be started October 1 of each year. Two years later, and with the permission of the RO, the file may be destroyed. It is good practice to make a careful review of the contents of the folders to be sure they do not contain material that is still needed for current operations before destroying them.

²⁰ For more information about schedules, see also [DFR](#).

5.2.3 File Folders, Labels, and Dividers

Paper File Folders. As a general rule, offices should use either letter size or legal size folders. Folders must have either a full-cut or a half-cut tab to accommodate a four-inch label. Just as shelves and drawers must not be over-packed, employees must avoid over-packing file folders. In both cases, over-packing makes searching difficult and record mutilation more likely.

To avoid over-packing folders, it is good practice not to file more than $\frac{3}{4}$ inch in a single folder. Once the folder has been filled to this thickness, a new folder must be prepared. In cases where there is a rapid accumulation of records, offices may use accordion folders with a capacity of 3 inches. Accordion folders are especially useful for filing large reports.

Labels. Folders must be clearly labeled for ease in searching and refileing. Labels must have enough information so that records can be easily found, but not so much information that the labels are difficult to read.

Labels must be large enough to accommodate four lines of text. It is recommended that offices use Avery Number 5161 Address labels (see figure 2). The label text must include the following information:

1. OPM schedule, disposition item, and disposition item name
2. Folder name in bold
3. Disposition and retention period specifications
4. Record location

<ol style="list-style-type: none">1. ADM 1. Organizational and Functional Files2. FY 2010 Reorganization Correspondence3. PERM. Break Annually. NARA 204. OCIO 5425, Cab. R-2

Figure 2. Recommended Label Text

Note that line 3 abbreviates the actual disposition and retention period text of schedule ADM 1. This is necessary because disposition and retention period specifications are often lengthy. Their full text cannot fit on a 4-inch label. In this instance, the disposition of the record is permanent. This is abbreviated as **PERM. Break Annually** follows the actual specifications of the schedule item, but **NARA 20** indicates that these records are to be transferred to NARA after 20 years.

The fourth line gives the location of the folder. This is necessary for efficient refiling. In the example, the first element of the location (OCIO) is the office where the record is filed; the second element (5425) is the room number, and the third element (Cab. R-2) is a code for a specific filing cabinet and shelf or drawer, in this case cabinet R, shelf 2.

Dividers. Dividers, or file guides, can be used as a tool to make file searching and refiling easier. They are made of heavy cardboard, are usually the size of a letter-sized file folder, and have a tab for an identifying label. Use dividers to identify groups of folders, i.e., FY 2008 Case Files, to separate those case files from all other case files.

Electronic File Folders. Just like paper files, electronic files need to be well-organized and labeled correctly so that they are identifiable and accessible by all employees. This is especially important for government agencies in order to comply with legal requirements to ensure the availability, integrity, accessibility, and, if appropriate, the confidentiality of all records.

5.2.4 File Stations

Each office or organizational unit with a significant number of records must establish a file station. The file station is the location where the file plan, file guide, and charge out cards are located. A file station can be a container affixed to the side of the first filing cabinet in an office, or it can be the first folder in the first filing cabinet. Remember, the file station, in whatever form it takes, must contain:

- A copy of the office file plan,
- A copy of the office file station guide, and
- A number of charge out records.

The **office file plan** lists all record series used by the office. In addition to the record series, each folder within the series is listed.

The **office file station guide** lists the contents of each file drawer or shelf by schedule and record series. For example, if the office has some administrative records (OPM Schedule ADM) and some records pertaining to competitive examinations (OPM Schedule EXR), its records would be arranged in the file drawers in order by schedule and record series as follows:

SCHEDULE	ITEM# ²¹	ITEM DESCRIPTION
ADM	1	Organizational and Functional Files
ADM	5	Invitations and minutes of ad hoc meetings
EXR	3	Correspondence relating to shipment of tests
EXR	4	Stock control records

The file station guide must be ordered in the same way, reflecting the order of files by schedule and record series found in the file drawers as in figure 3 on the next page.

A **charge out record** is a listing of folders that have been removed, showing who removed them and when they were removed. It is a means of tracking records at the folder or document level. The charge out record used by OPM is Optional Form 23 (OF 23), as shown in the example at figure 4 below.

When removing a folder or document,²² enter the required information in the form. Enter the folder name or a description of the document in the *Identification of Record* column; enter your name and office in the *Charged To* column; and enter the date the folder or document was removed in the *Date Charged Out* column. After entering this information, place the form in the files where the folder or document was removed. When the folder or document is returned to the files, the form will help ensure that it is refiled correctly. Remove the charge out record, strike through the entry for the returned records and return it to the file station. A small supply of these forms can be kept at the file station, or employees can simply download the form from the GSA Forms Library Web site.

5.3 Records Retirement

5.3.1 Retiring Active Records

The Federal Records Centers (FRCs) operated by NARA will accept active records for storage.²³ However, offices are encouraged to avoid this practice because of the expense of having to recall active records. If there is a shortage of agency storage space, however, storing active records at FRCs is one option. It is the RO's responsibility to approve any retirements of all records, including active records, to an FRC.

Before shipping active records to the FRC, the Records Coordinator must obtain the approval of the OPM Records Officer. This can be done in an attachment to the SF 135 Records Transmittal and Receipt form. The Records Officer has to be aware of any active records being retired to an FRC. Before signing an SF 135 form not accompanied by an active records attachment, the

²¹ A disposition item is synonymous with a record series. Both determine the disposition and retention of a record.

²² Removal of individual documents from a folder is not recommended. To avoid accidental loss of records, it is recommended that employees, interns, and contractors chargeout the folder in which the record is filed whenever possible.

²³ See [FRC Toolkit under Storage and Servicing Active Records](#).

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Records Officer must examine the disposition authority cited and the disposal date indicated on the form. This data will determine whether the records being retired are active or inactive.

OPM FILE STATION GUIDE

Location: OCIO RM 5425, Cabinet A, Shelves 1 and 2		Page: <u> </u> of <u> </u>
Schedule and Item Number	Folder Name or Description	Disposition and Retention Period
ADM 1	Reorganization Chart for 2005	PERMANENT. Break annually. Transfer to NARA when 20 years old.
ADM 1	Reorganization Chart for 2010	PERMANENT. Break annually. Transfer to NARA when 20 years old.
ADM 5	Minutes From Productivity Workshops	Break annually. Destroy 3 years after break.
BUF 87 a(1)	Control Office Master Address File Action Lists	Destroy when 3 years old.
BUF 87 a(2)	Individual Payroll Office Master Address File Action Lists	Destroy when 1 year old.
EXR 3	Test Shipment Billing	Break annually. Destroy 1 year after break.
EXR 3	Test Shipment Correspondence	Break annually. Destroy 1 year after break.
LEG 3a	Legislative Bill Correspondence	PERMANENT. Break annually. Transfer to WNRC periodically. Offer to NARA when 15 years old.
LEG 3b	Proposed Legislation: FY 2008	Destroy immediately upon adjournment of related session of Congress.
LEG 3b	Proposed Legislation: FY 2009	Destroy immediately upon adjournment of related session of Congress.

Figure 3. File Station Guide to be Included with File Station Material

OUT

IDENTIFICATION OF RECORD (NUMBER, TITLE AND/OR SUBJECT, DATE OF FILE OR DOCUMENT)	CHARGED TO (PERSON & OFFICE)	DATE CHARGED OUT
ADM 5 Minutes From Productivity Workshops	John Q. Public, OCIO/IM/RECMGMT	06/14/2011
EXR 3 Test Shipment Correspondence	Jane Doe, OCIO/IM/RECMGMT	08/23/2011
LEG 3b Proposed Legislation: FY 2008	Alfred E. Neuman OCIO/IM/QA	10/13/2011

Figure 4. Chargeout Record (OF 23)

5.3.2 Retiring Inactive Records

Inactive records, whether temporary or permanent, are most often retired to FRCs. Records must be retired from agency space to FRC storage only if transfer costs do not exceed the expense of retaining them in agency space. Records sent to FRC storage must have a remaining retention of at least 1 year. If special circumstances, such as a lack of filing equipment or space, make it imperative that records be retired, exceptions can be made to this policy. These decisions are made on an individual basis by the appropriate NARA facility director in consultation with the OPM Records Officer.

Procedures for transferring records to records center storage in a NARA facility are found in 36 CFR 1228.154(c) and 1228.160.

5.4 Guidelines for Managing Nonrecord Materials

When it is difficult to decide whether certain files are records or nonrecord materials, the Records Officer must treat them as records. Nonrecord materials must not be interfiled with records, and must be destroyed when no longer needed for reference.

The following are the nonrecord files most commonly found in OPM:

1. **Working files** contain papers on projects or cases in progress. Included are such things as studies, data in various forms, preliminary drafts, opinions, concepts, schedules, etc. Working files are frequently maintained at the workstations of the employees working on the project. When final action is taken, these files must be screened to extract all (non?)record materials relating to the project or case. The remaining papers are to be retained in a reference file pertaining to the project or case. NARA exempts working files such as preliminary drafts and rough notes seen only by the author from its retention requirements.²⁴

²⁴ See 36 CFR 1222.34(c)(1).

2. **Reference files** consist of work-related material that is kept only for the operating convenience of an office. Typical reference files contain such things as extra copies of reports, brochures, regulations, and correspondence. The information in these files is normally available elsewhere, but because the office frequently refers to it, they keep a copy for convenience. This material must be reviewed and purged periodically, and may be destroyed when it has served its purpose.

Reference files **may** be interfiled in the same file cabinets with record files in cases where all materials on a subject should be filed together. Otherwise, people looking for information on a particular subject would be required to look in both the record and reference files to ensure that they had found all materials on the subject.

Formerly it was the practice at OPM to print record copies of documents on yellow onionskin paper. This made the record copies easily distinguished from reference copies.²⁵ Offices may continue this practice if they wish, but record and reference files **must not** be filed together in the same folders. Record and reference files must be clearly identified as to type by using one color of file folder labels on the record file folders and another color on the reference file folders, or equivalent means.

3. **Reading files** are extra copies of communications written by the employees of the organizational component in which the file is kept. They are arranged in a folder by date (most recent date first).

6. RECORDS DISPOSITION

6.1 Definition of Records Disposition

Records disposition means the actions taken regarding Federal records when they are no longer needed in office space to conduct current agency business. These actions include:

1. Transferring records to records storage facilities.
2. Transferring records from one Federal agency to another.
3. Transferring permanent records to the National Archives.
4. Disposing of temporary records no longer needed to conduct agency business, usually by destruction or occasionally by donation.

Subsections 6.11 – 6.14 of this Directive explain how to carry out each of these four actions. Before any action is taken to destroy records, however, all records must be **inventoried** and **scheduled**.

²⁵ Many documents older than ten years have a yellow, onionskin coversheet. Documents with these yellow sheets are record copies, not reference copies and should not be destroyed before consulting the appropriate schedule. When such documents are discovered in office record collections, the RC must make a determination, based on the document's age, whether to retire, destroy, or transfer it to NARA.

Inventorying involves distinguishing records from nonrecord materials and personal papers, and gathering information about the records themselves.²⁶ See Subsection 6.4 below for further details on conducting a series inventory.

Scheduling means that different types of records are identified, described, and grouped together and specific instructions are applied to properly retain, destroy, or archive them after the appropriate period of time. All Federal records, including those created or maintained for the Government by a contractor, must be scheduled. See Subsection 6.5 below and [36 CFR 1228.22 Developing Records Schedules](#) for more details on how records schedules are developed.

6.2 Agency Functions

OPM's schedules are based on some 20 agency business functions, such as Administrative Management, Business and Finance, and Personnel. Each OPM schedule includes a variety of record types or classifications. Before records can be scheduled, retired to FRCs, destroyed, or archived, knowledge of the agency's business functions and record classifications is needed.

To begin the process of organizing the records, it is necessary to review the agency's functions as reflected in its program responsibilities, structure, and levels of authority. Doing this involves examining pertinent documents, such as laws, regulations, organization charts, and functional statements, and consulting with program managers and records personnel. This process is essential in locating, inventorying, and classifying agency records. The following questions must be answered:

- Which are the key line and staff offices?
- What programs does the agency have?
- What units are responsible for developing policies?
- What is the nature of staff support activities? Legal? Fiscal and budgetary? Inspection? General management? Administrative services?

OPM has assigned its functions to two broad groups: administrative functions and program functions. These two groups account for 24 separate functions, as follows:

ADMINISTRATIVE FUNCTIONS

ADM – Administrative Management

ADS – Administrative Services

BUF – Business and Finance

COM – Committee Management

EOR – Electronic Office Records

PROGRAM FUNCTIONS

APP – Appeals

CLC – Classification and
Compensation

EDU – Employee Development
and Utilization

EMP – Employment

ERS – Employee Relations and
Services

²⁶ For more information about conducting a record series inventory, see [DFR, Chapter III The Records Inventory](#).

FEB – Federal Executive Board
Operations

INF – Information Services

EVL – Evaluations

EXR – Examining and
Recruiting

INS – Insurance

INV – Investigations

IPP – Intergovernmental
Personnel Programs

LEG – Legal

MED – Medical

OCR – Office of Congressional
Relations

OIG – Office of Inspector
General

PER – Personnel

RET – Retirement

OPM's records management program is unusual in that these functions also serve as OPM records schedules.

6.3 Records Classification

Records management begins with records classification. Classifying the records in an office is simply placing them into categories that make sense for the business practices of the office. Start with those categories common to all or most offices such as correspondence, reports, contracts, or financial documents. These broad categories can be divided into finer subcategories depending on the size and complexity of the office.

The next step is to combine the classifications arrived at with the business functions developed in Section 6.2. For example, the Office of General Counsel (OGC) is likely to have many legal records. The primary business function of this office is Legal and the OPM schedule most often used is probably LEG (Legal). However, simply calling every record a legal record is not sufficient to help in identifying and locating individual records, all of which may be legal records, but of very different types. For instance, legal correspondence might be a useful combination of agency Function/Schedule and record classification.

The fact that most offices create and receive a variety of correspondence simply means that finer classifications need to be created. In an office like OGC, there may be correspondence dealing with court cases, legislative bills, voting rights, and legal advice. Each of these groups represents a combination of agency function and records classification.

6.4 Series Inventory

After identifying agency functions and record classifications, the next step is to perform a series inventory. In records management, an inventory is a descriptive listing of each record series, together with an indication of location and other pertinent data. It is not a list of each document or each folder but rather of each series.

A series inventory can provide valuable information about the volume and variety of records and the ratio of records to nonrecords. An inventory can also show what percentage of the agency's records are unscheduled.²⁷

Information gained from inventorying can show the status and condition of the records management program in each phase of the records life cycle. For instance, conducting a thorough series inventory can show the rate at which certain types of records are accumulated during the *records creation and receipt* phase. During the *records maintenance and use* phase, this accumulation rate helps determine how long records must be *maintained* in active storage and whether new shelving must be acquired.

An inventory can also show the reference activity of any series of records. The reference activity is simply how often a record series is accessed. NARA classifies records' reference activity as:

- ***Current***: at least one reference per month;
- ***Semicurrent***: less than one reference per month; and
- ***Noncurrent***: not used for current agency business.

An inventory can determine if a record series has a high, medium, or low rate of activity – i.e., whether it is current, semicurrent, or noncurrent. With this knowledge, records managers can plan when records can be retired to a Federal Records Center, destroyed, or transferred to the National Archives.

Planning for the orderly retirement, disposal, or archiving of records is one of the primary aims of inventorying. These plans are formally documented in an agency's records schedules.

6.5 Records Schedules

A records schedule is a formal description of a group of related records providing mandatory instructions about how long the records must be kept, and whether they must be destroyed or archived at the end of that period. It is important to realize that the disposition and retention instructions indicated in records schedules are legally binding.²⁸

²⁷ See Appendix B, Glossary, for the definition of “unscheduled records”.

²⁸ See [44 U.S.C. 3303\(3\)](#).

Records schedules are sometimes referred to as records control schedules or records disposition schedules. Certain Standard Forms²⁹ refer to disposition authority, meaning the records schedule authorizing the disposition of a series of records.

There are two basic types of records schedules: Organizational Schedules and Functional Schedules. Organizational schedules are prepared for each department or division within an agency; functional schedules are grouped by business function or functional type. Most OPM schedules are functional schedules, although there are a couple of organizational schedules also.³⁰

NARA must approve all agency records schedules.³¹ Agencies must also receive NARA's approval before lending records outside the Federal Government,³² before retiring them to NARA-operated records centers,³³ and before transferring them to other Federal agencies,³⁴ unless exceptions are granted by the Archivist of the United States. In fact, it is illegal to remove or destroy official records unless they are covered by a NARA-approved disposition schedule.³⁵

Agencies must also receive NARA's approval before establishing or relocating their records centers³⁶ and before converting permanent or unscheduled paper originals to other media.³⁷ Previously approved schedules for permanent hard copy records can now be applied to records in other media either by sending NARA a notification or by rescheduling with a SF 115 Request for Records Disposition Authority form.³⁸

Records are created by or for an agency and are maintained under agency control as long as the records are needed to conduct agency business. Records schedules are required for **all** records. When a new kind of record is created which is not covered by an existing records schedule, one must be created for it.

In 1978, use of the General Records Schedule was made legally mandatory. The disposal authorization must be used by a Federal agency to the greatest extent possible General Records Schedules in developing their own schedules. However, agencies that have program schedules that are unique to the mission of that agency and are not covered by the GRS. When this happens, contact the NARA records appraisers, who will assist agency staff in the development of new schedules.³⁹

²⁹ For example, SF 115, Request for Disposition Authority; SF 135, Records Transmittal and Receipt; and SF 258, Agreement to Transfer Records to the National Archives.

³⁰ OPM's schedule [ADM](#) (Administrative Management) is an example of a functional schedule; schedule [OIG](#) (Office of Inspector General) is an organizational schedule.

³¹ See [36 CFR 1220.38\(b\)](#).

³² See [36 CFR 1228 Subpart E, Loan of Permanent and Unscheduled Records](#).

³³ See [36 CFR 1228.160](#).

³⁴ See [36 CFR 1228 Subpart H, Transfer of Records From the Custody of One Executive Agency to Another](#).

³⁵ See [44 U.S.C. 3303a](#) and [3314](#).

³⁶ See [36 CFR 1228.240](#).

³⁷ Other media includes electronic, microform, cartographic, etc. See [36 CFR 1228.31](#), [1228.266](#), and [1228.268](#).

³⁸ See [NARA Bulletin 2010-04 Guidance Concerning Notifications For Previously Scheduled Permanent Records](#).

³⁹ To find OPM's NARA Records Appraiser, see NARA's [Contact Information For Federal Agency Appraisal And Scheduling Work Groups](#), and click on [Domestic Work Group 2](#).

6.5.1 General Records Schedules and OPM Schedules

For the purposes of scheduling records in the Federal Government, there are two different groups of records schedules. These two groups are (1) the General Records Schedules (GRS) issued by NARA and available on [NARA's Web site](#), and (2) individual record schedules approved by NARA for specific agencies such as OPM. The 25 schedules included in the GRS are listed below. Notice that although the schedules are numbered 1 through 27, one schedule (19) is reserved and another (22) has been withdrawn.

General Records Schedules

Schedule 1.	<u>Civilian Personnel Records</u>
Schedule 2.	<u>Payrolling and Pay Administration Records</u>
Schedule 3.	<u>Procurement, Supply, and Grant Records</u>
Schedule 4.	<u>Property Disposal Records</u>
Schedule 5.	<u>Budget Preparation, Presentation, and Apportionment Records</u>
Schedule 6.	<u>Accountable Officers' Accounts Records</u>
Schedule 7.	<u>Expenditure Accounting Records</u>
Schedule 8.	<u>Stores, Plant, and Cost Accounting Records</u>
Schedule 9.	<u>Travel and Transportation Records</u>
Schedule 10.	<u>Motor Vehicle Maintenance and Operations Records</u>
Schedule 11.	<u>Space and Maintenance Records</u>
Schedule 12.	<u>Communications Records</u>
Schedule 13.	<u>Printing, Binding, Duplication, and Distribution Records</u>
Schedule 14.	<u>Information Services Records</u>
Schedule 15.	<u>Housing Records</u>
Schedule 16.	<u>Administrative Management Records</u>
Schedule 17.	<u>Cartographic, Aerial Photographic, Architectural, and Engineering Records</u>
Schedule 18.	<u>Security and Protective Services Records</u>
Schedule 19.	RESERVED
Schedule 20.	<u>Electronic Records</u>
Schedule 21.	<u>Audiovisual Records</u>
Schedule 22.	Inspector General Records (WITHDRAWN)
Schedule 23.	<u>Records Common to Most Offices Within Agencies</u>
Schedule 24.	<u>Information Technology Operations and Management Records</u>
Schedule 25.	<u>Ethics Program Records</u>
Schedule 26.	<u>Temporary Commissions, Boards, Councils and Committees</u>
Schedule 27.	<u>Records of the Chief Information Officer</u>

As noted in [Subsection 6.2](#), OPM's schedules are a close match to OPM's business functions. Because of this, OPM's schedules cover broad categories of records and have many individual disposition items.

OPM's GRS-based and individual records schedules are available on THEO on the [OPM Publications Database](#). In addition to applying the General Records Schedules to our internal agency records, OPM issues instructions to other agencies regarding the maintenance and disposition of records for which OPM has Government-wide program responsibility. These

instructions are issued through the FPM Issuance System, Privacy Act notices, and by delegations of authority and other means. Before issuing such instructions, OPM offices must ascertain if they conform to records disposition guidelines published by NARA in General Records Schedule No. 1 (Civilian Personnel Records). When the NARA guidelines do not apply, OPM must submit the instructions to NARA for approval. Records created because of new programs must be scheduled for disposition within 1 year of the implementation of the program. Submit requests for approval of these disposition instructions to NARA through the OPM Records Officer, as described in Subsection 6.6.

GRS schedules that are open-ended (e.g., destroy when no longer needed for administrative, legal, audit, or other operational purposes) must be modified by the Records Officer to apply a more specific disposition instruction, such as destroy when 1 year old or delete after 2 update cycles applying the modified disposition to agency and program needs. The point of organizing an agency's electronic records is to enable accessibility not only by current users, but by future users as well. Records retention schedules are applied to electronic records just as they are to paper records. Having the relevant date associated with the file is essential. Though many operating systems store this information with the file, as users move the file among folders and computers and as the file is re-saved as revisions are made, those dates change. A file could have dates that do not make much sense to its original creation. The best way to prevent confusion is to embed the relevant date (the date that the file was created or revised) in the file name itself.

6.5.2 New or Revised Records Schedules

If your office has records that are not covered by an approved records disposition schedule, you must obtain a new or revised disposition schedule. In addition, if your office develops a new program, or program revision, requiring new records to be maintained by a number of OPM offices, your office must submit a request for approval of a disposition schedule for the records.

By definition, unscheduled records are not covered by NARA approved disposition schedules. Therefore, they must be treated as permanent records until they are covered by an approved schedule.⁴⁰ NARA approval is required *even if you no longer accumulate the records in question*.

PUT in NOTE box Note: If your office wishes to destroy unscheduled records, you must first consult the OPM Records Officer, who will then consult with OPM's NARA appraiser as to whether or not these records can be destroyed. Subsection 6.6 provides instructions on recommending and obtaining approval of a new or revised records disposition schedule. More detailed guidelines on the factors to consider when recommending disposition schedules are in the NARA records management handbook, Disposition of Federal Records (DFR).

To reiterate, NARA must approve:

- Any new and revised OPM records schedules.
- Any temporary extension of a retention period.⁴¹

⁴⁰ See [36 CFR 1228.70](#).

⁴¹ See [36 CFR 1228.32](#) and [1228.54](#).

- The use of a retention period that is different from that provided in a General Records Schedule.⁴²

6.6 Standard Form (SF) 115 and Requesting a New or Revised Records Schedule

To request NARA approval of a new or revised schedule, submit an email to the OPM Records Officer in the Office of the Chief Information Officer (OCIO) and provide a description of the records and a recommended retention period as outlined in paragraphs 1 and 2 below. Based on this description, the RO will make a determination whether the records described are:

1. already covered by one or more GRS schedules,
2. are covered by one or more OPM schedules,
3. are covered by either the GRS or OPM schedules, but require substantial revision,⁴³ or
4. are new records presently not scheduled by either GRS or OPM schedules.

If the RO decides that either option 3 or 4 pertain to the records, a Standard Form (SF) 115 Request for Records Disposition Authority will be completed and sent to NARA for approval.⁴⁴

You must complete a SF 115 form for the scheduling of all records for which no GRS or OPM schedule is applicable. You must also complete a SF 115 form to make substantial revisions in a schedule already approved by NARA (see Note 44). Such revisions constitute an amendment and must be approved by NARA.

After an annual inventory and file plan is completed, you may have discovered unscheduled records in your office. The information about these records can be used in completing a SF 115. In fact, it is often during the inventory process that unscheduled records, or records whose schedules require revision, are discovered.

SF 115 forms are usually complete the Records Coordinator and signed by the Records Officer, but occasionally NARA will complete SF 115 forms and the Records Officer approves the form. This may happen during a project to schedule large numbers of unscheduled agency records stored in FRCs. In this case, NARA submits the SF 115 to the agency that owns the records for their approval.

The SF 115 form itself is brief and consists mainly of boxes for contact information (Boxes 1 through 5), an Agency Certification box confirming that the signatory below is authorized to act for the agency in matters pertaining to records disposition, and that Government Accountability Office (GAO) concurrence is not required, is attached, or has been requested (Box 6) (see Subsection 6.7.2).

Box 7 Item Number is used to list disposition item numbers for new schedules or new disposition items for existing schedules to be revised.

Box 8 Description of Item and Proposed Disposition is the most important part of the form. Here the RO, working with the RC(s) and Program Manager(s) most familiar with the records, write a summary description of the records included in a new schedule. Below this summary

⁴² See [36 CFR 1228.42 \[Schedule\] Applicability](#).

⁴³ Substantial revision means the addition of a new series of records to the schedule, i.e., a new disposition item; or the change of disposition or retention periods or both to one or more disposition items in the schedule.

⁴⁴ See [DFR, Chapter V Schedule Preparation And Clearance](#) for more information about the SF 115 form.

description, there will be descriptions of individual items or sub-items. Below the description(s) there must be included language indicating the disposition of the records and their retention periods (see [Subsection 6.7.1](#)).

Box 9 will be completed by the RO only when the SF 115 is used to revise an existing schedule by entering the GRS schedule or SF 115 number. The SF 115 number will be in the format:

- N# - #### - ## - #.⁴⁵

Box 10 is completed by NARA.

1. Description of the Records

Describe the records for which you need a disposition schedule. Show the inclusive dates of the records. Indicate if they are not textual records (for example, magnetic tape, photographs, or sound recordings).

Each record series must contain the largest practical grouping of separately organized and logically related materials that can be treated as a single unit for purposes of disposition. Subparts of a series may be listed separately if numbered consecutively as 1a, 1b, etc., under the general series. (See Section 7 for instructions for electronic records, electronic information systems, and Web records.)

NARA also needs specific information on the identification and definition of all electronic data sets transferred, record layouts specifying relative positions, lengths, and definitions of all data elements, and codebooks for all unique codes used in the records.

A description for electronic records must include the elements indicated below:

- Name of the system: Indicate the commonly used name and acronym of the system.
- System control number: Specify the internal control number assigned to the system for reference, control, or cataloging purposes. For example, the ADP plan control number.
- Agency programs supported by the system: Show the agency program(s) or mission(s) to which the system relates, and cite any laws or directives authorizing such programs or missions. Also, list the names, office addresses, telephone numbers, and location of the program personnel who can provide additional information about the program and the system supporting it.
- Purpose of the system: Indicate the reasons for the system and the requirements met by it.
- Data input and sources: Describe the primary data input sources and the providers of the data to the system. Also, give the names of any other systems, either inside or outside the agency, from which this information system receives data.

⁴⁵ See NARA's [Records Control Schedules](#) for PDFs of most SF 115s for Record Groups 146 (Civil Service Commission) and 478 (OPM).

- Major output: Show the system's main products and the frequency of their preparation. For example, reports, tables, charts, graphic displays, catalogs, or correspondence-prepared weekly, monthly, or yearly. Also, indicate whether the information is transferred to other systems.
- Information content: Indicate the main subject matter, date coverage, time span, geographic coverage, update cycle, and other major characteristics of the system. Also, tell whether the system saves superseded information and whether it contains microdata or summary data (see [Section 7 Electronic Records](#) in this directive).

2. Recommended Retention period

Following the guidelines below, include a recommended retention period, with a brief explanation of how you arrived at the recommended period.

As a general rule, no series should be retained for more than 5 years after creation, or 5 years after the close of the transaction or case file, or 5 years after an event without justification by the creator of the file or file custodian. If you are recommending a retention period of more than 5 years, include a justification in the request memorandum. The justification would normally be one of the following:

- Administrative needs requiring a longer period.
- Pertinent statutory provisions, if any.
- Needs pertaining to rights of and benefits to individuals.
- Needs pertaining to national security.
- Government-wide needs.

If you are recommending a permanent retention period, explain how the records meet the criteria set forth in [Subsection 6.9](#) of this directive.

3. Media Neutrality

All new records schedules submitted to NARA for approval after December 17, 2007 are considered media neutral unless otherwise specified in the schedule. This means that the disposition instructions apply to the records described in the schedule regardless of whether they are paper, electronic, or in some other medium.⁴⁶ For more information about media neutral schedules, see NARA's [Frequently Asked Questions \(FAQs\) About Media Neutral Schedule Items](#).

6.7 Records Disposition and Retention Periods

Records schedules indicate both a record's disposition (whether it is of temporary or permanent value) and its retention period (how long the record must exist in agency ownership before it is destroyed or archived). The retention period is the period of time during which OPM must be concerned with records maintenance.

⁴⁶ See [36 CFR 1228.24\(b\)\(3\)](#).

Although maintenance of our permanent records is a particular concern, we must be mindful of how all OPM's records are maintained. While the great majority of any agency's records are temporary, there is wide variation in the length of retention periods. Temporary records can be retained anywhere from a few months to decades. Care must be taken in the maintenance of all records, but most especially those with long retention periods.

Once records are no longer needed by OPM, the ownership of permanent records is transferred to NARA, and temporary records are destroyed. It should be noted here that unscheduled records cannot be destroyed and their ownership cannot be transferred to NARA. Unscheduled records are treated like permanent records, at least until they are given a NARA-approved schedule or destroyed.

6.7.1 Wording of Disposition Instructions and Retention Periods

The wording of the schedule disposition instructions must be completely clear. If records are to be retired to a Federal Records Center (FRC) when they become inactive, the schedule must make this clear in its disposition instructions. The timing of the records destruction and whether it is to take place at OPM or a FRC must not be left to chance or possible misinterpretation. This also means that offices must inventory their records annually to make sure that records are being retired, destroyed, or archived in a timely manner.

Use the term "destroy" instead of "dispose of" or "dispose" in the disposition instructions. Technically speaking, "dispose" means destruction or donation of records and nonrecords.⁴⁷ Please note there is a common misconception that the word dispose can mean the removal of records from an office rather than physical destruction. This is not correct. Depending upon the scenario, the correct words to use are "transferring" "retiring" "loaning" "donating" or if transferring records to NARA, you are then archiving records. Contact your Records Coordinator or Records Officer for further clarification.

The use of the word "destroy," does not preclude donation of the records. Temporary records may be donated by agencies to any eligible person, organization, institution, corporation, or government (including a foreign government) that has requested them, with prior written approval from NARA.⁴⁸ Permanent or unscheduled records are not eligible for destruction and cannot be permanently donated.

It is important to remember that neither permanent nor *unscheduled* records may be destroyed without the approval of OPM's Records Officer and NARA's appraiser.

Permanent and unscheduled records can also be loaned to other Federal Agencies for limited periods. They may not, however be loaned to non-Federal entities without NARA approval. See 36 CFR 1228.70 – 1228.76.

⁴⁷ See [DFR, Appendix D Glossary](#) (1997 edition in paper only). See EPA's [Records Web](#) site under Glossary, Abbreviations and Acronyms which is based on the NARA document.

⁴⁸ See [36 CFR 1228.60](#), Donation of temporary records.

One method of expressing the retention period for temporary records is to specify a fixed period after the creation of the records. For example, the phrase "destroy when 2 years old" provides continuing authority to destroy records in a given series 2 years after their creation.

Records can also be scheduled for destruction a fixed period after a predictable event, as in the following examples:

- "After completion" (e.g., of a study, project, or audit).
- "After sale or transfer" (e.g., of personal or real property).
- "After publication" (e.g., of an annual report).
- "After it is superseded" (e.g., a directive).
- "After revision or cancellation" (e.g., of a form).
- "After acceptance or rejection" (e.g., of an application).
- "After audit" (e.g., of accounts).
- "After settlement" (e.g., of accounts or a claim).
- "After acceptance" (e.g., of a bid or recommendation).
- "After end of fiscal year" (e.g., of budget reports).
- "After termination" (e.g., of a contract).
- "After transfer" (e.g., of an employee).
- "After conversion from paper to another medium" (e.g., the PDF⁴⁹ image from scanning information contained in a paper report).

You may transfer the records after the event has occurred and provide a definite disposition date, as in the following disposition instruction: "Retire records to FRC after completion of project. Destroy 5 years after retirement."

Avoid open-ended retention periods as much as possible. Retention period language such as "destroy when no longer needed" must only be used for nonrecords or records of very brief retention (less than a year).

Every effort must be made to establish retention periods that are fixed rather than contingent because of the cost of storage incurred by OPM.

6.7.2 Obtaining Government Accountability Office (GAO) Clearance

You must obtain Government Accountability Office (GAO) approval before:

- applying a retention period of less than three years to program records,
- before scheduling records pertaining to claims by or against the Government, and

⁴⁹ PDF stands for "Portable Document Format", a type of image file.

- before applying retention periods that are shorter than those applied by the General Records Schedules for the following types of records.⁵⁰ Note that these types of records are expressly covered by GRS 2 through GRS 10.
 - Payroll and pay administration
 - Procurement and supply
 - Property disposal
 - Budget preparation, presentation, and apportionment
 - Accountable officers' accounts
 - Expenditure accounting
 - Stores, plant, and cost accounting
 - Travel and transportation
 - Motor vehicle maintenance and operation

The OPM Records Officer will obtain this clearance, when it is required. Your request memorandum must explain why the shorter retention period is required.⁵¹

6.8 Factors to Consider When Recommending Retention Periods

6.8.1 Frequency of Reference

The frequency of reference is a major determinant of retention periods. The following are examples of retention periods based on normal reference experience:

- (1) Office correspondence files on administrative matters
 - At group and division levels: 3 years
 - At other levels: 2 years
- (2) Office correspondence files on program matters
 - At all levels: 3 years
- (3) Reports data
 - At summarizing levels: 4-5 years
 - At submitting levels: 2-3 years
- (4) Records of routine transactions
 - 6 months to 1 year after completion of the transaction
- (5) Inspection and audit reports
 - 5 years
- (6) Work papers for publications

⁵⁰ See [CFR 36 CFR 1228.30\(d\)](#) and [44 U.S.C. 3309](#).

⁵¹ Box 6, Agency Certification, of the [Standard Form 115 Request for Records Disposition Authority](#) specifically calls for the Records Officer to certify that he or she is authorized to request disposition authority for records and that written concurrence by the GAO is not required, is attached, or has been requested.

- 2 years after publication

(7) Transaction files

- Maximum of 6 years after close of file or termination of transaction unless there are special legal factors requiring a longer period

6.8.2 Legal Factors

Legal factors may influence the determination of some retention periods. Federal statutes of limitations require that some records be retained for as long as legal actions are possible.

The Records Disposal Act of 1943 states:⁵²

Records pertaining to claims and demands by or against the Government of the United States or to accounts in which the Government of the United States is concerned, either as debtor or creditor, may not be disposed of by the head of an agency until the claims, demands, and accounts have been settled and adjusted in the Government Accountability Office, except upon the written approval of the Comptroller General of the United States.

Claims must be made within 6 years after the event on which the claim is based. Few statutes of limitations affecting the retention of records are longer than 6 years. Transportation claims must be brought within 3 years of a given event. A 6-year period governs tort and other types of claims brought before the Court of Claims.

When retention periods are based on the requirements of a statute of limitations, a short period in addition to the required limit may be added. This is sometimes needed to prevent legal problems that may arise if disposal is effected on the exact day that statutes of limitations expire. The length of such added periods must be carefully controlled. Legal factors other than statutes of limitations may affect the determination of retention periods. Ongoing litigation may influence the retention of many classes of records beyond established retention periods. Records involved in pending claims must be withdrawn and segregated. In this way, the scheduled disposal of records can proceed without interruption or complication. The OPM Records Officer must maintain close contact with OPM's Office of the General Counsel (OGC) to avoid the improper destruction or archiving of records subject to litigation freezes and holds, or the indefinite postponement of the destruction of unneeded records. The Records Officer must request that OGC submit an annual list of all litigation holds as an added safeguard. See Section 8 for more details concerning litigation holds and freezes.

⁵² See [44 U.S.C. 3309](#).

6.8.3 Name Files

Three conditions govern the disposal of name files relating to rights, benefits, and other transactions involving persons:

1. **Close of the file.** This takes place when claims benefits are exhausted (for either the claimant or survivors), after the death of the individual, or after separation from the Federal service.
2. **Provisions of statutes governing a program.** These affect rights following the close of a file and the time limits on exercising those rights.
3. **Administrative needs of the agency.** These affect re-audit, determination of fraud, or relation to internal agency program controls.

6.8.4 Other Factors

Special OPM administrative needs may influence retention periods. A temporary program may be in progress, a special management audit may have been undertaken, or a special investigation may be taking place. If one or more of these circumstances may continue beyond 1 year, retention periods for related records must be geared to the temporary needs. When those needs have been satisfied, shorter periods must be determined.

6.9 Identifying Permanent Records

This subsection describes the types of records that NARA generally appraises for permanent retention. These are general guidelines only, as they cannot possibly cover the great variety of records maintained by the Federal Government.⁵³

6.9.1 Files Documenting Substantive Agency Programs

Records originated by the Director's Office and by other key OPM personnel are often designated for permanent retention since they document the evolution of major policies and procedures. These records include correspondence with outside groups and organizations, internal memorandums, narrative and statistical reports, budget estimates and justifications, and a variety of other records.

Files created at lower levels within the agency may be designated for permanent retention when they document significant developments that are not documented by files maintained at the higher levels within the agency. Where substantial duplication exists, the file created at the highest level is chosen.

6.9.2 Selected Case Files

Although most case files are disposable at some future date, a complete set occasionally may be designated for permanent retention. More frequently, however, only a portion of a case file is

⁵³ See [DFR, Appendix C Appraisal Guidelines For Permanent Records](#).

selected for transfer to the National Archives. Those chosen normally fall under one or more of the following categories:

- The case established a precedent, and therefore resulted in a major policy or procedural change.
- The case was involved in extensive litigation.
- The case received widespread attention from the news media.
- The case was widely recognized for its uniqueness by established authorities outside the Government.
- The case was reviewed at length in OPM's annual report to Congress.
- The case was selected to document agency procedures instead of capturing information relating to the subject of the individual file.
- The file is for a person of historical significance such as a former President, Vice President, Member of Congress, high-level appointment, survivor of a high-profile individual, and anyone who has or is receiving media attention or is historically of high importance, whether famous or infamous.

6.9.3 Analytical Reports

Regional reports forwarded to the central office are sometimes selected because they contain information relating to ethnic, social, economic, or other aspects of specific geographical locations. Excluded from selection are studies and reports that are published and therefore widely available to public libraries, as well as recurring periodic reports that are summarized on an annual basis.

6.9.4 Records of Internal OPM, Interagency, and Other Committees

These include minutes, agendas, proposals submitted for review, and final recommendations of meetings of ad hoc and more formally established councils, conferences, etc.

6.9.5 Legal Opinions and Comments on Legislation

Includes memorandums prepared by OGC and program offices concerning interpretations of existing laws and regulations that govern OPM or have a direct effect on its operations. Normally excluded are general comments and opinions relating to other Federal Agencies. Included are formal comments on pending legislation prepared at the request of Congress or the Office of Management and Budget (OMB). Excluded are copies of bills, hearings, and statutes held for convenient reference.

6.9.6 Evaluations of Internal Operations

These may include evaluations of both program and administrative operations, and may be made by OPM or by outside agencies. Agency internal evaluations will be made in accordance with 36 CFR 1220.42 relating to records creation and record keeping requirements, maintenance and use of records and records disposition. The evaluations shall include periodic monitoring of staff determinations of the record status of documentary materials in all media, and implementation of

these decisions. These evaluations should determine compliance with NARA regulations. Only studies that recommend significant changes in policy or note significant procedural violations are preserved.

6.9.7 Formal Directives, Procedural Instructions, and Operating Manuals

a. Records of Functional Organizations

These include organization charts, reorganization studies, function statements, and maps showing field organization and boundaries.

b. Briefing Materials

These include statistical and narrative reports, and briefing books, designed to inform recently appointed senior OPM officials of the current status of the agency or their portions of the agency.

c. Public Relations Records

These include the remarks made by the Director and other senior OPM officials concerning OPM programs. This also includes one copy of each news release or other prepared statement issued to the news media.

d. Publications

These include annual reports to Congress; studies conducted by OPM or under contract for OPM; procedural brochures, pamphlets, and handbooks distributed for guidance to other Federal Agencies; and audiovisual instructional and educational materials.

e. Scientific and Technical Data

These include data resulting from controlled laboratory or field experiments. The data may be recorded in either human-readable or machine-readable format and may be found in notebooks, completed forms, tabulations and computations, graphs, microforms, or machine-readable files. These items are selected for preservation if they are unique, usable, and important. The data must be accurate, comprehensive, and complete, and likely to be applied to a wide variety of research problems. In assessing the importance of any set of data, consideration must be given to its historical as well as its scientific significance.

6.10 Flexible Scheduling, “Big Bucket” Schedules, and Flexible Retention

Largely in response to the passage of the E-Government Act of 2002 ([44 U.S.C. 3501](#)), NARA issued several bulletins describing flexible scheduling and retention as techniques for scheduling large numbers of unscheduled electronic information systems.⁵⁴

⁵⁴ See NARA Bulletins [2005-05](#), [2008-04](#), and [2010-03](#).

Flexible Scheduling: Traditional records schedules are generally applied to discrete groupings of records or individual databases. Flexible scheduling attempts to provide concrete disposition instructions and retention periods to groupings of information and categories of records. Functional schedules lend themselves to flexible scheduling more easily than organizational schedules.

“Big Bucket” Schedules: Big bucket schedules are flexible schedules that are applied to larger aggregations of records or systems. GRS 26, Item 2a, Records Created by Advisory Commissions, is one example of a big bucket schedule.

Flexible Retention: Flexible retention periods allow for minimum and maximum retention periods to be assigned to large aggregations of records as found in big bucket schedules. The use of maximum and minimum retention periods can be expressed with such instructions as:

- Destroy when 3 years old. Records may be retained for an additional 2 years if required for business purposes, or
- Destroy when no less than 3 years old and no more than 6 years old.

6.11 Transferring Records to Records Storage Facilities

OPM may transfer records for storage in the following types of storage facilities:

- NARA Federal Records Centers (FRCs).⁵⁵
- Records centers operated by or on behalf of OPM,⁵⁶ either alone or together with other Federal Agencies, other than NARA.
- Commercial records storage facilities operated by private entities independently of OPM.

Records transferred to a storage facility remain in OPM’s legal custody. See 36 CFR 1228 Subpart K for storage facility standards, the requirements that OPM must meet before transferring records,⁵⁷ and mandatory transfer procedures.⁵⁸

6.12 Federal Records Centers

6.12.1 Purpose and Location

A nationwide system of Federal Records Centers (FRCs) is operated by NARA for the cost-effective storage of Federal records. Records are now stored in these centers at a **per box charge** to agencies, including OPM. The records stored in the FRCs remain in the custody of the submitting agencies and can be accessed at any time. See contact information for the National and Regional Federal Records Centers on the next three pages.

6.12.2 Records Eligible for Transfer to a Federal Records Center (FRC)

⁵⁵ See NARA’s [FRC Toolkit](#) for procedures for shipping records to a Federal Records Center.

⁵⁶ Such as the Retirement Operations Center at Boyers, PA.

⁵⁷ See [36 CFR 1228.154](#).

⁵⁸ See [36 CFR 1228.160](#).

OPM's records disposition schedules indicate when many OPM records are to be transferred to the FRC. Records transferred to the FRC must meet the following criteria.

- Records must be designated for transfer to a FRC in a NARA-approved records disposition schedule. The Federal regulations regarding the transfer of records to storage can be found in 36 CFR 1228, Subpart I.
- Records must be covered by a disposition schedule with a definite disposition date. The disposition date cannot be contingent on some other event, such as “destroy 6 months after the abolishment of the register”. Contingency disposition will be allowed by the OPM Records Officer when:
 - The contingency upon which the disposal of the records is based is unavoidable, i.e., disposal after a set retention period would unduly hamper the operation of the agency, endanger legal rights or obligations of individuals or the Government, or prevent the agency from carrying out statutory responsibilities.
 - The annual volume of the series justifies the shipping and processing expenses of retirement.
 - The FRC's have sufficient space to accommodate the records.
 - OPM provides a review date for the periodic, systematic review of the records to determine if they can be destroyed.
- Records must not be needed to carry out current agency operations.
- Records must be referred to only occasionally (usually not more than once a month per file drawer) in the normal course of events.
- Records must not be eligible for immediate destruction, or for destruction within 1 year of the date of transfer.
- It must cost less to transfer the records than to retain them in agency space and equipment.

Records which meet the above criteria, and which are adequate in volume to justify the transfer, must be sent to a FRC.

Give priority to transferring records from expensive office space, from space convertible to office use, from leased space, and from reusable filing equipment.

Before transferring records, remove all nonrecord materials from the files. Do not transfer nonrecord files to the FRC. Destroy this material when it is no longer needed. See Subsections 4.1.1 Nonrecords and 4.1.2 Personal Papers. Section .01.B.2 of Part I of AM Supplement 44-2, Maintenance of Records, also discusses the difference between record and nonrecord file materials.⁵⁹

NATIONAL RECORDS CENTERS

⁵⁹ The Maintenance of Records (1993) is out of print and not available on the [OPM Publications Database](#), although Word copies are in existence. Contact the OPM Records Officer for more information.

Records Management for OPM Internal Administrative

Areas Served	Location
<p>Entire Federal Government for personnel records of separated Federal employees; medical and pay records of all Federal employees; designated medical records of Army and Air Force military personnel and their dependents; and records of agencies in the St. Louis area (Missouri only), of Scott AFB, IL, and of the Memphis Service Center, Internal Revenue Service. Permanent microforms from offices (except Washington, D.C. area) are stored at the National Personnel Records Center-Civilian Personnel Records.</p>	<p><u>National Personnel Records Center</u> <u>(Civilian Personnel Records)</u> 111 Winnebago Street St. Louis, Missouri 63118-4126 * * * (314) 801-9250 FAX: (314) 801-9269 * * * Email: cpr.center@nara.gov</p>
<p>Designated records of the Department of Defense and the U.S. Coast Guard.</p>	<p><u>National Personnel Records Center</u> <u>(Military Personnel Records)</u> 9700 Page Avenue St. Louis, Missouri 63132-5100 * * * Phone: (314) 801-0800 Fax: 314-801-9269 Email: mpr.center@nara.gov</p>
<p>District of Columbia, Maryland, Virginia, and West Virginia and armed forces worldwide (except records of Federal courts in MD, VA and WV)</p> <p>Permanent microforms from offices in the Washington, D.C. area.</p>	<p>Shipping and mailing address: <u>Washington National Records Center</u> 4205 Suitland Road Suitland, MD 20746-8001 * * * (301) 778-1600</p>

Figure 5. National Records Centers

REGIONAL RECORDS CENTERS CURRENT AS OF SEPTEMBER 10, 2010

Region	Location	Areas Served
<u>NARA's Northeast Region (Boston)</u>	Frederick C. Murphy Records Center 380 Trapelo Road Waltham, MA 02452- 6399 (781) 663-0130	Maine, Vermont, New Hampshire, Massachusetts, Connecticut, and Rhode Island
<u>NARA's Northeast Region (Pittsfield)</u>	Federal Records Center 10 Conte Drive Pittsfield, MA 01201- 8230 (413) 236-3600	Selected Federal records from throughout the U.S.
<u>NARA's Mid-Atlantic Region</u>	Federal Records Center 14700 Townsend Road Philadelphia, PA 19154- 1096 (215) 305-2000	Delaware and Pennsylvania, and Federal court records for Maryland, Delaware, Virginia, West Virginia, and Pennsylvania
<u>NARA's Southeast Region</u>	Federal Records Center 4712 South Park Blvd. Ellenwood, GA 30294 (404) 763-2820	Kentucky, North Carolina, South Carolina, Tennessee, Mississippi, Alabama, Georgia, and Florida
<u>NARA's Great Lakes Region (Chicago)</u>	Federal Records Center 7358 South Pulaski Road Chicago, IL 60629-5898 See NARA Chicago Web site for phones.	Illinois, Wisconsin, Minnesota, and Federal court records for Indiana, Michigan, Ohio, Illinois, Minnesota, and Wisconsin
<u>NARA's Great Lakes Region (Dayton)</u>	Federal Records Center 3150 Springboro Road Dayton, OH 45439-1883 (937) 425-0600; and 8801 Kinsridge Drive Dayton, OH 45458 (937) 425-0601	Indiana, Michigan, Ohio, Agency Services, Bankruptcy Reference, and selected Internal Revenue Service Centers
<u>NARA's Central Plains Region (Lee's Summit)</u>	Federal Records Center 200 Space Center Drive Lee's Summit, MO 64064- 1182 (816) 268-8100	Federal Agencies and courts in New Jersey, New York, Puerto Rico, The U.S. Virgin Islands, and most Department of Veterans Affairs offices nationwide

Records Management for OPM Internal Administrative

Region	Location	Area Served
<u>NARA's Central Plains Region (Lenexa, KS)</u>	Federal Records Center 17501 W. 98 th , Suite 47-48 Lenexa, KS 66219 (913) 563-7600	Kansas, Nebraska, Iowa, and Missouri Veterans Affairs and Internal Revenue Service records.
<u>NARA's Southwest Region</u>	Federal Records Center 1400 John Burgess Drive Fort Worth, TX 76140 (817) 551-2000	Texas, Oklahoma, Arkansas, and Louisiana
<u>NARA's Rocky Mountain Region</u>	Denver Federal Center Building 48 West 6 th Avenue & Kipling Street PO Box 25307 Denver, CO 80225 (303) 407-5700	North Dakota, South Dakota, Colorado, Wyoming, Utah, Montana, and New Mexico
<u>NARA's Pacific Region (Riverside)</u>	Federal Records Center 23123 Cajalco Road Perris, CA 92570-7298 (951) 956-2000 riverside.archives@nara.gov	Clark County, Nevada, Southern California (counties of San Luis Obispo, Kern, San Bernardino, Santa Barbara, Ventura, Los Angeles, Riverside, Orange, Imperial, Inyo, and San Diego), and Arizona
<u>NARA's Pacific Region (San Francisco)</u>	Federal Records Center 1000 Commodore Drive San Bruno, CA 94066-2350 (650) 238-3500	Nevada (except Clark County), California (except Southern California) and selected Federal Agencies in the Pacific Ocean area
<u>NARA's Pacific Alaska Region</u>	Federal Records Center 6125 Sand Point Way, NE Seattle, WA 98115-7999 (206) 526-6501 seattle.archives@nara.gov	Washington, Oregon, Idaho, and selected Federal Agencies in Alaska, Hawaii, and the Pacific Ocean area

Figure 6. Regional Records Centers

6.12.3 Preparing Records Transfer Forms

Transfers to FRCs must be accompanied by Standard Form (SF) 135, Records Transmittal and Receipt. Electronic copies of the SF 135 are available at [NARA's Federal Records Centers Web site](#) under Forms.

Records Coordinators and other records management staff in Headquarters Program offices and in field offices complete the SF 135 form. After completion, the form is submitted to the OPM Records Officer, or designee, for approval and signature.

The instructions - At group and division levels: 4-5 years below cover item 6 on this form, and are for those field offices that complete the form themselves. Most of the items on the form are self-explanatory.

Columns 6a, b, & c, Transfer Number

A separate transfer number, formerly called an accession number, is required for each series of records listed on the form. A transfer consists of records in one series that have the same disposal authority and disposition date. Each transfer will be shelved in contiguous space in the record center. The transfer number consists of three parts.

- a. The OPM record group number, which is 478 (RG 478).
- b. The last two digits of the current fiscal year.
- c. A four digit sequential number. This number is assigned by the FRC that will be receiving the retired records.

Column 6d, Volume

Enter the total volume (in cubic feet) for each series of records being transferred. Each standard size FRC carton equals 1-cubic foot.

Column 6e, Agency Box Numbers

Show the inclusive box numbers for each transfer being shipped. Each new transfer must begin with number 1 and each carton must be numbered sequentially in the upper right hand corner.

Column 6f, Series Description

Describe the records in sufficient detail to allow the records center to check for the proper application of the disposal authority and to facilitate reference service. Indicate whether or not the records have special status such as "vital records" or "GAO site audit records." Give the inclusive dates of the records. Indicate the organizational component that created the records when it is different from that shown in item 5, the address of the originating organization. Explain special restrictions here (see the following section – 6g). Identify any boxes that have

non-textual materials. If materials will not fit into standard FRC boxes (such as rolled drawings), include the dimensions of the records in inches.

Column 6g, Restrictions

Enter one of the following codes in column 6g to show the restrictions on the use of the records.

- Q - "Q" security classification
- T - Top secret
- S - Secret
- C - Confidential
- W - Restricted use/witnessed destruction required (specify restriction in column 6f). See Subsection 6.14 Disposing of Temporary Records.
- R - Restricted use/witnessed destruction not required (specify restriction in column 6f)
- N - No restrictions

OPM should have few, if any, occasions to use the first four restrictions above. The "W" restriction is appropriate, however, for records covered under the Privacy Act of 1974. Other restrictions, such as limiting access to certain agency officials, are to be specified by a statement in column 6f.

Column 6h, Disposal Authority

For each series of records, cite the OPM records schedule and the specific item number authorizing disposition. If the records are covered by a disposition schedule that has not yet been incorporated into the OPM Records Disposition Schedules Directive, cite the NARA disposition job and item number. See Subsection 6.6 of this Directive for NARA disposition job number format. If the records are covered by the General Records Schedule (GRS), list the GRS schedule number and item number.

Column 6i, Disposal Date

Applying the disposition authority cited in column 6h, enter the month and year the records must be destroyed.

Email a copy of the SF 135 completed through Box 6 to the OPM Records Officer. The RO will review the SF 135 for accuracy and completeness. The RO will approve the SF 135 by signing and dating the form in Box 2. If the RO does not approve the SF 135, it will be sent back to the preparer's office to be corrected. After approval, the RO will email the SF 135 to the FRC. The FRC will review the SF 135 for completeness, and to determine the appropriateness of the transfer. If the transfer is approved, the FRC will assign a Transfer number (See Boxes 6a, 6b, and 6c of the SF 135) to the SF 135 and email the form to the OPM Records Officer, indicating that the records may be transferred. The RO will forward the approved SF 135 to the preparer's office.

After receiving the approved SF 135, the preparer will write the transfer number on each box to be shipped. The preparer will also write box numbers on each box in the format Box 1 of 8, Box 2 of 8, etc. The preparer will place copy of the FRC-approved SF 135 in the last carton of the shipment when the records are shipped to the center. The center will annotate block 6j with the shelf location where each transfer is stored.

The physical transfer of the records must be made within 90 calendar days after the receipt of the approved SF 135. A delay of more than 90 days will require resubmission of the SF 135.

Upon receipt of the records shipment at the records center, the cartons are matched against the copy of the SF 135 submitted with the transfer. That copy is then signed by a representative of the FRC and returned to the submitting office. Any changes in the location numbers will be noted on this receipt copy before it is returned. This is the only receipt that the records center will provide for the transferred materials.

Note that FRC has four quarterly disposal cycles, in January, April, July, and October. Advance the disposition date for temporary records into the next cycle.

6.12.4 Preparing the Files for Transfer

1. Records Center Boxes

The standard container used to transfer letter- and legal-size documents to a FRC is a cardboard box (known popularly as a records center box). Each box holds approximately 1-cubic foot of records. The following records center boxes and materials required for records transfer are available from the General Services Administration:

(a) Standard-size record boxes:

14 3/4" x 12" x 9 1/2" NSN 8115-00-117-8349

(b) Special-purpose boxes:

Half-size box

14 3/4" x 9 1/2" x 4 7/8" Special Order - GSA

Use half-size boxes only for microfilm, index cards, or other odd-size material. When preparing SF 135, item 6(d), a half-size box equals 1/2 cubic foot each.

Magnetic tape box

14 3/4" x 11 3/4" x 11 3/4" NSN 8115-00-117-8347

Microfiche box

14 3/4" x 6 1/2" x 4 1/2" NSN 8115-01-132-1923

2. Packing the Cartons

Use the proper size box when packing records. For legal- and letter-size material, use standard-size boxes. Place letter-size records in the box with labels facing the numbered end. The numbered end will be opposite the stapled end. Place legal-size records in the box so that the

labels face to the left of the box as you face the numbered end (see [FRC Toolkit](#), figure 2). Leave approximately 1 inch of space in each box for working the files (more if interfiles will be added later). Send only completed or closed case files, contracts, etc. Leave all guides and tabs in the records if they will help the records center personnel service the records. Do not over-pack the boxes. Never add additional material on the bottom, side, or top of the records in the box.

In general, pack only one record series in a container. However, when a particular series consists of less than 1 cubic foot at the time of its scheduled retirement, you may pack more than one series in the same container, provided all of the series have the same retention period. Such combinations must be approved by the FRC before the records are packed for transfer.

You must purge non-record files before packing the boxes so that they contain only Federal record material. The boxes may not contain duplicate copies or other reference materials. Examples of materials, which you may not include, are extra copies of documents retained for stock, publications, copies of correspondence received for information rather than action, preliminary drafts of reports and correspondence, working papers, notes, tickler copies, and follow-up copies of correspondence.

While boxing the files, write the sequential box number in the upper right corner. Begin with box number 1 and include the total number in the accession, such as 1/10, 2/10, 3/10, etc. Put the transfer number in the upper left front of the carton (see [FRC Toolkit](#), figure 2). Transfer number and box number must be at least 1 1/2" high and written directly onto the box with a **BLACK**, permanent, felt-tip marker.

Do not use labels to supply additional identifying information. No standard method of affixing labels is effective in long-term storage. Provide any additional identifying information well below the accession number and box number, again using a permanent black felt-tip marker.

6.12.5 Shipping the Records

Shipments to record centers normally are made by mail, truck, or rail freight at the expense of the transferring agency. Regardless of the method of shipment used, keep the shipment cost as low as possible. When using commercial carriers, the lowest freight rate for "old" office records can be obtained by including the following statement on bills of lading or other shipping documents:

The agreed or declared value of this property is hereby specifically stated by the shipper not to exceed 3.5 cents per pound.

<p>a. One center carton holds 1 cubic foot of paper records weighing an average of 30 pounds; however, tabulating punch cards weigh in excess of 50 pounds per cubic foot.</p> <p>b. One ton of records, on average, measures 70 cubic feet in volume.</p> <p>c. One empty, four-drawer, letter-size, steel filing cabinet weighs 145 pounds: wood, 100 pounds.</p> <p>d. One empty, five-drawer, letter-size, steel filing cabinet weighs 195 pounds: wood, 180 pounds.</p> <p>e. One empty, four-drawer, legal-size, steel filing cabinet weighs 180 pounds: wood, 160 pounds.</p> <p>f. One empty, five-drawer, legal-size, steel filing cabinet weighs 214 pounds: wood, 200 pounds.</p> <p>g. One 40-foot freight car easily will ship 1,800 cubic feet of records.</p> <p>h. One 32-foot tractor trailer will transport 1,000 cubic feet of records, provided interstate weight limits governing carriers do not reduce these quantities.</p>	<p>i. One cubic foot equals 3,000 letter-size sheets of paper.</p> <p>j. One cubic foot equals 10,000 tabulating punch cards.</p> <p>k. A letter-size file drawer holds 1 1/2 cubic feet of records; a legal-size drawer holds 2 cubic feet.</p> <p>l. Fifty 100-foot, 35mm microfilm reels can be stored in a standard records center carton.</p> <p>m. One hundred 100-foot, 16mm microfilm reels can be stored in a standard records center carton.</p> <p>n. One letter-size National Archives box is to be computed as holding .35 cubic foot of records.</p> <p>o. One legal-size National Archives box is to be computed as holding .43 cubic foot of records.</p> <p>p. Seven reels of standard digital computer tape (2,400 ft. in length, 1/2 inch in width) are to be computed as the equivalent of 1 cubic foot.</p>
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Figure 4. Conversion Table for Estimating Size and Weight of Shipments of Records to FRCs

OPM Headquarters currently ships its internal administrative and programmatic records to the Washington National Records Center (WNRC) in Suitland, MD. This FRC prefers boxes of records to be placed on packing pallets or skids and moved to OPM's loading dock prior to pickup.

A packing pallet will hold 50 boxes and must be stacked so that the last box in the sequence is on the top level. A skid holds 24 boxes and also must be packed with the last box of the sequence on top. Facilities Management often has pallets and skids available for use. When requesting a pickup from WNRC, the RC or other staff responsible for the shipment must request the required number of packing pallets or skids, if Facilities Management has none.

If records being retired are to be transported a short distance (50 miles or less) by Government vehicle, the top flaps of the boxes need only be tucked. For shipments over long distances, or by commercial carrier, tape the top flaps and, as necessary, reinforce the bottoms and corners with tape. Strapping tape and other packing supplies can be ordered at the [GSA Advantage](#) Web site.

If you use a Government truck to transport large quantities of records, call the FRC Operations Branch or Loading Dock 24 hours before delivery so prompt unloading can take place. If you use a commercial carrier, instruct the carrier's dispatcher to call the Operations Branch or Loading Dock 24 hours before delivery. This instruction must be noted on the bill of lading.

See NARA's [FRC Toolkit](#) for details about shipping records to WNRC or other Federal Records Centers. The address for emailing SF 135s for WNRC approval is suitland.transfer@nara.gov.

6.12.6 FRC Reference Service

FRCs provide a wide-range of reference services, including loan or return of records to the agency of origin, preparation of authenticated reproductions of documents, and furnishing of information from the records. Most inquiries are answered within 24 hours of receipt. Urgent requests made by telephone or personal visit receive faster service.

At OPM headquarters, to retrieve a record from a FRC, contact the Records Officer, who will arrange to withdraw the record from the center. If you know the transfer number of the document, provide this information to the Records Officer. The Records Officer will retrieve the record from the FRC and arrange for delivery to the requester. FRCs will provide documents **only** to authorized requesters in each agency. These requests **must** be submitted through the Records Officer. The FRC will not provide documents directly to unauthorized requesters.

Agencies are required to update and keep current all Authorization to Request Information forms. Each OPM field office must designate two or more liaison representatives for retrieving documents from their FRC. The names, addresses, and telephone numbers of these representatives must be supplied in writing to the FRC.

Authorized representatives submit requests for retrieval of records on OF 11, Reference Request-Federal Records Centers. You may also use a letter or memorandum, but use of the form usually results in faster service. Note that FRCs also accept electronic requests via the Centers Information Processing System ([CIPS](#)) and the new Archives and Records Centers Information System ([ARCIS](#)).

Recently federal agency interaction with FRCs has become increasingly automated by using the new ARCIS system. ARCIS is a Web-based IT system that allows users to initiate records reference requests (records recall from FRC via OF 11) online. Agencies can also view past FRC records activity and the status of records that have been transferred via SF 135. In the near future, ARCIS will have the ability to accept electronic SF 135s, enable users to manage who in their agencies has access to their records, and who has the ability to retire, reference, or return records (see NARA's ARCIS Web site).

Service will be expedited if the request includes the name of the agency; the name, location, and telephone number of the person for whom the request is being made; a full description of the

information or records needed; and the agency container number, the FRC location number, and the transfer number assigned to the records by the center at the time of transfer. The information on the container, location number, and transfer number is available from the SF 135 prepared at the time the records were transferred to the center. Any additional information that could aid the center, such as an index number, must also be included. If there are no security restrictions, records centers can return a small number of records to OPM by mail or a parcel delivery service. Some FRCs now offer localized delivery services known as Metro Courier Service, that can deliver records to an agency within 24 hours of receipt of the request. Consult the agency records officer to see if you are eligible to receive this service. In special circumstances, we may ask centers to provide information directly from the records rather than sending the records themselves. Consult your agency agreement to determine applicable fees for service. (The Records Center program is now reimbursable and fees will apply).

Requests for service may now be processed in several ways: through ARCIS, CIPS, by telephone, by fax, or email. The email address is Suitland.Reference@nara.gov.

Federal personnel visiting a center, including messengers picking up agency records, must carry appropriate credentials. In the case of defense-classified documents, written authorization to examine the records is also required.

6.12.7 Disposal of Records in the Centers

When the records retired to a records center are eligible for destruction, the FRC sends the submitting agency NA Form 13001, Notice of Eligibility for Disposal, or an equivalent form, at least 90 days prior to the scheduled date of destruction.

The OPM Records Officer receives these forms. If a National Archives (NA) 13001 form is sent by mistake to any other than the OPM office, the recipient must immediately forward the form to the OPM RO.

The Records Officer will immediately notify the FRC if any of the records listed on the NA 13001 Notice of Eligibility for Disposal are subject to either an ongoing or pending litigation freeze or hold; or if there are other exceptional circumstances which dictate a longer retention for the records,. The FRC requires written concurrence from OPM's Records Officer agency before any records are destroyed.

OPM's RO may grant FRC prior approval for the destruction of eligible records, usually at the time of the transfer. Prior written approval reduces paperwork and permits the immediate destruction of the records at the end of the retention period. The RO with the NARA Appraiser's agreement may grant a destruction waiver for specific series of records transferred to centers on a continuing basis, or for a specific shipment transfer.

6.13 Transferring Permanent Records to the National Archives

The National Archives and Records Administration (NARA) will accept records for permanent retention if they have sufficient historical or other value to warrant preservation by the Federal Government

Subsection 6.9, of this directive, Identifying Permanent Records of this Directive shows the types of records usually classified as permanent.

Certain OPM records listed in the OPM Records Disposition Schedules are classified as permanent, to be offered to the National Archives after a given amount of time. In addition, OPM offices may have other records, which they believe, must be retained permanently for historical purposes. It is important to remember that NARA ultimately decides if a record series is of permanent value or is temporary.

Permanent records are normally retired to a Federal Records Center before their legal ownership is transferred to NARA. This is because the retention periods of most permanent records are long enough to make it economically desirable to move them out of agency office space to less expensive FRC space when they cease to be active.

In cases where the records are to be transferred to NARA from a FRC, it is NARA's responsibility to begin the transfer process by completing its portion of the Standard Form 258 (SF 258) Agreement to Transfer Records to the Archives of the United States, and sending the form to the OPM's Records Officer. The RO then completes OPM's portion of the SF-258, signs it, and returns the form to NARA. See NARA's Federal Records Centers Electronic Forms & Resources Web site for a copy of the SF-258 with Instructions

In cases where records were not retired to an FRC, but are still stored in an OPM office, OPM's RO will initiate the transfer of records by completing its portion of the SF 258 and sending the form to NARA for their approval and signature. Upon the RO obtaining the approved and signed SF 258, legal ownership of these records passes from OPM to NARA.

See 36 CFR Part 1228 - Disposition of Federal Records for details on how records in the National Archives can be used; transfer specifications and standards for different media; and required documentation to accompany electronic records.

6.13.1 Offering Permanent Records to NARA

OPM's Records Officer offers permanent OPM records to the National Archives. Offices having records that they believe must be retained permanently must contact the Records Officer. Guidelines on transferring records to the National Archives are in 36 CFR, Section 1228 Subpart L.

Unlike records transferred to the Federal Records Center, the records transferred to the National Archives become the official property of NARA. Transferring agencies can, however, specify restrictions on the use of these records, citing appropriate exemptions under the Freedom of

Information Act (FOIA) (see 5 U.S.C. 552).⁶⁰ NARA will abide by these restrictions, and will not relax them without prior clearance of the transferring agency. Also identify the alphanumeric code designation covering records constituting systems of records subject to the Privacy Act of 1974 (5 U.S.C. 552a).

Records appraised by NARA as permanent records are transferred to NARA when they are 30 years old, or at any age when --

- (1) The originating agency no longer needs to use the records for the purpose for which they were created, or in its regular current business; or
- (2) Agency needs will be satisfied by the use of the records in NARA research rooms or by copies of the records.

6.13.2 Audiovisual Records

Audiovisual records become obsolete rapidly. Permanently valuable audiovisual records must be offered directly to the National Archives as soon as OPM no longer uses them on a current basis.

1. Motion Pictures

When transferring motion pictures to the National Archives, the following copies are necessary for the motion picture preservation, duplication, and reference service:

For agency-sponsored films produced for distribution outside of the agency, include (1) the original negative or color original, plus separate optical sound track, (2) intermediate master positive or duplicate negative plus optical sound track, and (3) sound projection print.

For motion pictures produced for internal OPM use, include (1) the original negative or color original plus sound, and (2) a projection print.

2. Still Pictures

The following are necessary when submitting still photographs to the National Archives:

- For black and white photographs, the original negative, and a captioned print.
- For color photographs, the original color transparency or color negative, a captioned print, and an inter-negative if one exists.
- For slide sets, the original and a reference set, and the related audio recording and script if one exists.
- For other pictorial records, such as posters, original artwork, and filmstrips, the original and a reference print.

⁶⁰ See Section 8 FOIA, E-Discovery, and Litigation Freezes and Holds.

3. **Sound and Video Recordings**

For magnetic sound and video recordings, submit the original tape, disc, etc., or the earliest generation of the recording available. If the video and audio portions are on separate recording media, make sure that a copy of each is included.

See NARA's [Managing Audiovisual Records: An Instructional Guide](#) (1999).

6.13.3 **Machine-Readable Records**

1. **Magnetic Tape**

Computer magnetic tape is a fragile medium, highly susceptible to errors by improper care and handling. To ensure that permanently valuable information stored on magnetic tape is preserved, schedule the file for disposition as soon as possible after the tapes are written. When NARA has determined that a file is worthy of preservation, transfer it to the National Archives as soon as it becomes inactive, or whenever you can no longer provide proper care or handling of the tapes to guarantee the preservation of the information that they contain.

The tapes to be transferred to the National Archives must be on open reel magnetic tape or on tape cartridges. Open reel magnetic tape must be on one-half inch 7 or 9 track tape reels, written in ASCII or EBCDIC, and the data must be stripped of all extraneous control characters (except length indicators or marks designating a datum, word, field, block, or file), blocked no higher than 32,760 bytes per block, at 800, 1600, or 6250 bpi. Tape cartridges must be 18 track 3480-class cartridges recorded at 37,871 bpi. The open reel magnetic tapes or the tape cartridges must be new or recertified tapes, which have been passed over a tape cleaner before writing and rewound under uniform tension. See [36 CFR 1228.270\(c\)](#).⁶¹

2. **Other Magnetic Media**

If the data designated for transfer to the National Archives is maintained on a direct access storage device, it must be transferred to magnetic tape, meeting the specifications in 1 above, before transferring it to the National Archives.

3. **Documentation**

Every transfer of electronic records to the National Archives requires documentation. The content of documentation varies from file to file. The information may be found in paper, microform, or electronic form. If any of the relevant documentation is in electronic form, provide it along with the electronic records. Some [OPM Records Disposition Schedules](#) contain specific instructions concerning documentation that must accompany the transfer of electronic records.

It is probably easiest to transfer records on Compact-Disk, Read Only Memory (CD-ROM) because agencies typically have the drives for this media and it is inexpensive. Other acceptable

⁶¹ Also, see NARA's [Transfer Of Electronic Records](#) for an overview.

media include magnetic tape and tape cartridges, such as Digital Linear Tape (DLT). You may also use File Transfer Protocol (FTP).⁶²

A completed SF 258 (SF 258), Agreement to Transfer Records to the National Archives of the United States, accompanies the transfer. For electronic records, NARA signs the SF 258 after the processing is completed, not upon receipt of the records.

Attach a form NA 14097 Technical Description for Transfer of Electronic Records (see Fig. 7 on the next page), or its equivalent, containing a specific technical description of each file transferred. The core pieces of required information are:

- name of the file(s)
- technical contact for the file(s)
- form: either 3480 cartridge or, for open reel tape, number of tracks and tape density
- character code (ASCII or EBCDIC)
- type of internal labels (ANSI or IBM Standard)
- internal file names (dataset names)
- record length and block size
- number of records
- date recorded

Include the number of records for each file for verification purposes.

Each file requires a definition of its structure and content. At minimum, this includes a record layout and a codebook for each field containing coded information. Information in documentation might be in publications; administrative reports; annual reports; memoranda; user notes; system guides; inventories or control systems for electronic records; file description; Privacy Act notices; or manual or automated data dictionaries. For documentation, the information is more important than the format.⁶³

Documentation for databases and electronic information systems (EIS) must include the SF 258 and form NA 14028 Information System Description (see figure 8).⁶⁴

⁶² See [Transferring Permanent Electronic Records To NARA: Answers To The Top Five Questions](#).

⁶³ See [NARA Bulletin 2005-06](#), [36 CFR 1228.270 Electronic Records](#), and [36 CFR 1234.32](#) Retention and disposition of electronic records.

⁶⁴ See Section 7 Electronic Records in this directive for more information about electronic records and electronic information systems.

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TECHNICAL DESCRIPTION FOR TRANSFER OF ELECTRONIC RECORDS TO THE NATIONAL ARCHIVES		
FILE IDENTIFICATION		
OFFICIAL FILE TITLE, COMMONLY USED IDENTIFIER, AND/OR DESCRIPTIVE TITLE:		02. ACRONYM ASSIGNED TO FILE:
RESTRICTIONS ON ACCESS:		
04. TITLE/DESCRIPTION OF DOCUMENTATION PROVIDED:		05. FORMAT OF DOCUMENTATION: <input type="checkbox"/> Paper <input type="checkbox"/> Electronic Format (<i>Specify</i>) <input type="checkbox"/> Other (<i>Specify</i>):
06. ELECTRONIC (agency name and address):		07. IDENTIFY TECHNICAL CONTACT(S)
FILE CHARACTERISTICS		
08. SHORT TITLE ON EXTERNAL LABEL	10. STORAGE MEDIA UNIT VOLUME SERIAL NUMBER:	12. DENSITY (CPI/BPI):
09. RETURN STORAGE MEDIA TO AGENCY AFTER ARCHIVAL PROCESSING: <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Provide Address for Return (if different from item 06):	11. TYPE OF MEDIA PROVIDED: <input type="checkbox"/> Open-Reel Magnetic Tape <input type="checkbox"/> 3480-Class Tape Cartridge <input type="checkbox"/> Other (<i>Specify</i>):	13. NUMBER OF TRACKS: <input type="checkbox"/> 7 <input type="checkbox"/> 9 <input type="checkbox"/> 18 <input type="checkbox"/> Other (<i>Specify</i>):
14. FILE ORGANIZATION ON STORAGE MEDIA <input type="checkbox"/> One File on One Media Unit <input type="checkbox"/> One File on Multiple Media Units <input type="checkbox"/> Multiple Files on One Media Unit <input type="checkbox"/> Multiple Files/Multiple Media Units	15. RECORDED LABEL (Internal Label) <input type="checkbox"/> IBM OS <input type="checkbox"/> IBM DOS <input type="checkbox"/> ANSI X 3.27 Standard <input type="checkbox"/> No Internal Labels <input type="checkbox"/> Other (<i>Specify and Describe</i>)	16. CHARACTER SET <input type="checkbox"/> ASCII <input type="checkbox"/> EBCDIC <input type="checkbox"/> BCD (7 track only) <input type="checkbox"/> Binary <input type="checkbox"/> Packed Decimal <input type="checkbox"/> Other (<i>Specify</i>)
17. DATE FILE COPIED:		
18. INTERNAL FILE NAME/IDENTIFIER (aka Data Set Name):	19. SEQUENCE OF FILE ON STORAGE MEDIA UNIT: File of	20. NUMBER OF LOGICAL RECORDS (Blocking Factor):
21. RECORD TYPE <input type="checkbox"/> Fixed Length (F) <input type="checkbox"/> Fixed Length Blocked (FB) <input type="checkbox"/> Other Than Fixed Length (<i>Specify Format</i>)	22. LENGTH OF LOGICAL RECORDS IN CHARACTERS OR BYTES:	24. NUMBER OF LOGICAL RECORDS:
	23. LENGTH OF PHYSICAL RECORDS IN CHARACTERS OR BYTES:	25. NUMBER OF PHYSICAL RECORDS (Blocks):
26. AGENCY COMMENTS:		
27. FORM PREPARED BY: Name:	Phone:	28. DATE FORM COMPLETED:

Figure 7. NARA Form 14097, Technical Description for Transfer of Electronic Records

The instructions for completing this form are as follows:

INSTRUCTIONS

GENERAL:

The purpose of this form is to facilitate the transfer of electronic records with continuing or enduring value to the National Archives. A packet containing additional information on the transfer of electronic records is available from the National Archives. This form is not intended to take the place of other required documentation. FIPS PUB 20 contains a discussion of file documentation. Technical information describing each file is required by 36 CFR, but NA Form 14097 is optional. If there is an alternative reporting format that provides all of this required information, substitute the report for NA Form 14097. Include the required information as an attachment to the SF 258. A separate form must be completed for each file. If multiple files have very similar technical specifications, one form with an attachment that specifically identifies all of the files covered by the form may be used.

IDENTIFICATION SECTIONS

01. Official Title, Commonly Used Identifier, and/or Descriptive Title.

Enter the name by which the agency identifies the file. Consider how the title would appear in a bibliographic entry. If there is no official title, provide a descriptive title.

02. Acronym Assigned to File. Enter the commonly used abbreviation or acronym as assigned by the agency. Often, the acronym as assigned by the agency. Often, the acronym will be used on the external (gummed) label of the storage media unit.

03. Restrictions on Access. Specify any restrictions that apply to this file - cite FOIA exemption, and, if b (3), cite statute, indicate specific columns of types of records in the file that are affected; specify length of restriction on access and method of determining the date when restrictions end. If there are no applicable restrictions on access, please indicate.

04. Title/Description of Documentation Provided. Documentation is required for all transfers of electronic records to the National Archives. Enter the title or

description of the documentation provided by the agency for the file. Guidelines are available on the source and content of documentation. If any documentation is available in electronic form, include it in the transfer.

05. Format of Documentation Provide. Mark all boxes that apply to the transfer with an "X." If "Electronic Format" is checked, include a technical description form for each documentation file in electronic format. If "Other" is checked, be as specific as possible in describing the documentation transferred.

06. Electronic Records Submitted by. Enter the name and address of the agency that is responsible for the transfer.

07. Identify Technical Contact(s). Identify the person who will respond to technical questions about the records if they arise during archival processing.

FILE CHARACTERISTICS

08. Short Title on External Label of Storage Media Unit. Enter the short title that appears on the external (gummed) label of the storage media unit(s).

- 09. Return Storage Media to agency After Archival Processing.** The National Archives returns the reels or cartridges included in the transfer to the agency when two preservation copies have been created. Check "No" to indicate that the storage media must not be returned or provide an address for return shipment. If yes, Provide Address for Return (if different from Item 06).
- 10. Storage Media Unit Volume Serial Number.** Enter the volume serial number that uniquely identifies this tape/tape cartridge. If the file is recorded on multiple volumes, enter the first volume serial number in this item and list others, in sequence, in item 26.
- 11. Type of Media Provided.** To comply with the transfer standard identified in 36 CFR, a storage media unit must be an open-reel magnetic tape or 3480 tape cartridge. Enter an "X" in the appropriate box. If "Other" is checked, contact the National Archives prior to transfer and provide a specific identification of the storage media used for transfer.
- 12. Density (CPI/BPI).** Enter an "X" in the appropriate box to indicate characters or bytes per inch.
- 13. Number of Tracks.** Enter an "X" in the appropriate box. For 7 track tapes, indicate whether the parity is odd or even in Item 26.
- 14. File Organization on Storage Media.** If a single file on a single storage media unit is described, check "One File on One Media Unit." If a multi-volume file is described, check "One File on Multiple Media Units." If more than one file is on the storage media unit, check "Multiple Files on One Media Unit." If the transfer includes multiple files on multiple files on One media units, check "Multiple Files on Multiple Media Units".
- 15. Recorded Label (Internal Label).** Enter an "X" in the appropriate box. If "Other" is checked, provide a specific description of the internal labels in Item 26.
- 16. Character Set.** Enter an "X" in the appropriate box. If "Binary" or "Packed Decimal" is checked, indicate the characters (bytes) that are stored in those formats in Item 26.
- 17. Date File Copied.** Enter the date that appears on internal labels, if the files are labeled. This is the date the records were copied onto the storage media unit(s).
- 18. Internal File Name/Identifier (aka Data Set Name).** If there is a recorded label, enter the file identification (e.g., Data Set Name) used in the label. File Names in IBM standard labels must follow IBM DSN naming conventions.
- 19. Sequence of File on Storage Media Unit.** If this is the only file on the storage media unit, enter a "1". If the storage media unit contains multiple files, enter the file's position number on the storage media unit. See Item 14.
- 20. Number of Logical Records per Block (Blocking Factor).** If "Fixed Length" is checked in Item 21, enter the blocking factor.
- 21. Record Type.** Enter an "X" in the appropriate box. If "Other Than Fixed Length" is checked, a specific description of the format is very important, especially if the documentation provided does not contain a precise description. Use Item 26 to describe "Other" formats.
- 22. Length of Logical Records in Characters or Bytes.** Enter the logical record length in bytes or characters. If the record is not fixed length, enter the maximum size record, and describe techniques used to control and indicate size in Item 26.

- 23. Length of Physical Records in Characters or Bytes.** Enter the physical record length in bytes or characters. If the record is not fixed length, enter the maximum size record, and describe techniques used to control and indicate size in Item 26.
- 24. Number of Logical Records.** Enter the number of logical records in the file. This number is usually supplied by the program which created the file. Labels are not included in this count. If the last block is padded with blank records to fill out the block, please provide a total record count and a count of records that contain information.
- 25. Number of Physical Records (Blocks).** Enter the number of physical records (blocks). Labels are not included in this count.
- 26. Comments.** Provide additional information as necessary or desired. If the information pertains to another item on the form, identify the relevant item number. Files transferred to the National Archives should not be software-dependent in accordance with 36 CFR. If there are any exceptions to this, identify the release and/or level of any software required to read the file. Provide attachments if the information required will not fit in Item 26.
- 27. Form Prepared By.** Enter the name and phone number (including area code) of the individual who prepared this form.
- 28. Date Form Completed (YY/MM/DD).** Enter date this form was prepared

NA Form 14097 Back MSW(Rev. 8/92)

Information System Description Form

1. SYSTEM TITLE		2. SYSTEM CONTROL NUMBER	
3. AGENCY PROGRAM SUPPORTED BY SYSTEM		4. PROGRAM AUTHORITY	
5. SYSTEM DESCRIPTION			
5A. PURPOSE/FUNCTION OF SYSTEM			
5B. SOURCE(S) OF DATA (Include inputs from other systems)			
5C. INFORMATION CONTENT			
5D. SYSTEM OUTPUTS (Include outputs from other systems)			
6. NAME AND ADDRESS OF PRINCIPAL PROGRAM OFFICE SUPPORTED BY THE SYSTEM (Include room numbers)			
7. AGENCY CONTACTS (Names, addresses and phone numbers of system and program personnel who can provide additional information about the system and the program it supports.)			
8. PREVIOUS DISPOSITION JOBS			
9A. PREPARER'S NAME		9B. OFFICE NAME AND ADDRESS	
9C. PHONE NUMBER			
SIGNATURE		DATE	

Figure 8. NA Form 14028⁶⁵

The following are instructions for completing the Information System Description Form (NA Form 14028 (-88)).

⁶⁵ See [DFR, Chapter III](#).

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1. The commonly used name and acronym of the system [e.g., Budget System, Grain Monitoring System]
2. The internal control number assigned to the system for reference, control, or cataloging purposes [e.g., Information System Inventory Number, ADP Plan control number]
3. What agency programs or missions does the system support?
4. What laws, directives, etc., authorize these programs?
5. Description has the following sections:
 - a. *Purpose/Function*: The reasons for and the requirements met by the system.
 - b. *Sources of Data*: The primary sources or providers of data to the system [e.g., broadcast license holders, corporations doing business in the U.S.]. Does this system receive information from other systems, from either within or outside your agency?
 - c. *Information content*: The principal subject matter, data coverage, time span, geographic coverage, update cycle, whether the system saves superseded information, major characteristics of the system, and whether the system contains microdata or summary data.
 - d. *Outputs*: The principal products of the system [e.g., reports, tables, charts, graphic displays, catalogs, correspondence], and an indication of the frequency of preparation. Is information from this system transferred to other systems?
6. Self-explanatory.
7. Self-explanatory.
8. Citations of previous NARA disposition jobs approving disposition of components [e.g., input forms, printouts, COM, output reports] of the system.
9. Self-explanatory.

6.14 Disposing of Temporary Records

Federal regulations state (at [36 CFR 1228.58\(b\)](#)) that temporary records to be destroyed are usually sold as wastepaper. In many areas, the GSA has negotiated standard regional contracts for the sale of waste paper. In these cases, call your [GSA](#) representative to make arrangements for the sale of waste paper. Where no such contract is in effect, or where the records are too far from the GSA office having the contract, GSA can assist in negotiating such a contract.

Defense-classified records may be sold as waste paper only if adequate safeguards are taken to prevent any disclosure of the information in the records before their pulping, shredding, or other destruction. This mutilation must occur before the sale, unless the records remain under the observation of an authorized Federal official or employee until their mutilation. Records bearing "secret" or higher classification must be burned, shredded, pulped, or macerated so that the record content cannot be restored. Contact the OPM Records Officer for additional guidelines on the handling of defense-classified records.

Administratively confidential records, including Privacy Act records, must be pulped or macerated by the contractor under the witnessing supervision of a Federal employee. Contractor employees authorized by OPM may also be employed to witness the destruction of records. At Headquarters, administratively confidential records are placed in special "burn bags", which are available from [GSA Advantage](#). When they are ready to be removed, contact the Facilities Management office in Facilities, Security & Contracting for their removal. For the destruction of both restricted and unrestricted temporary records, see [36 CFR 1228.58, Destruction of temporary records](#).

You must dispose of temporary records in accordance with the instructions below.

a. **Sale or salvage of unrestricted records:**

- (1) **Paper records.** Paper records to be destroyed normally must be sold as wastepaper or otherwise salvaged. All sales must follow the established procedures for the sale of surplus personal property.⁶⁶ The contract for sale must prohibit the resale of all records for use as records or documents.
- (2) **Records on electronic and other media.** Records other than paper records (audio, visual, and electronic records on physical media data tapes, disks, and diskettes) may be salvaged and sold in the same manner and under the same conditions as paper records.

- b. **Destruction of unrestricted records:** According to [36 CFR 1228.58](#), unrestricted records that OPM cannot sell or otherwise salvage must be destroyed by burning, pulping, shredding, macerating, or other suitable means.

⁶⁶ See [41 CFR 102-38, Sale of Personal Property](#).

c. **Destruction of classified or otherwise restricted records:** The following requirements apply to records that are restricted because they are national security classified or exempted from disclosure by statute, including the Privacy Act, or regulation:

- (1) **Paper records.** For paper records, OPM or its wastepaper contractor must definitively destroy the information contained in the records by one of the means specified in paragraph (b) above and their destruction must be witnessed either by a Federal employee or, if authorized by OPM, by a contractor employee.
- (2) **Electronic records.** Electronic records scheduled for destruction must be destroyed in a manner that ensures protection of any sensitive, proprietary, or national security information. Magnetic recording media previously used for electronic records containing sensitive, proprietary, or national security information must not be reused if the previously recorded information can be compromised in any way by reuse of the media.

You must obtain written approval from NARA before donating temporary records eligible for disposal to an appropriate person, organization, institution, corporation, or government (including a foreign government) that has requested them. Records that are not eligible for disposal cannot be donated. See 36 CFR 1228.60 for details.

See also:

36 CFR 1228 Subpart A, Records Disposition Programs

36 CFR 1228 Subpart D, Implementing Schedules

6.15 Disposition of Personal Papers and Extra Copies of Federal Records

Removal or destruction of Federal records may **only** occur with the authorization of NARA-approved records schedules or general records schedules. Criminal penalties may be imposed for the unlawful removal or destruction of Federal records. In addition, employees have a legal responsibility to inform responsible officials of any actual or threatened unlawful loss or removal of official records. See NARA's publication Documenting Your Public Service.

Federal officials must be aware of the requirement for identifying and maintaining personal papers separately from official records. The following section provides guidelines for carrying out this requirement.

6.15.1 Official and Personal Records Defined

Official records are materials made or received either under Federal law or in connection with the transaction of public business. Federal records are legally defined in 44 U.S.C. 3301 to include:

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. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and of processed documents are not included.

A legal definition of personal papers, and standards for their maintenance, are given at 36 CFR 1222.36:

Personal papers are documentary materials, or any reasonably segregable portion thereof, of a private or nonpublic character that do not relate to or have an effect upon the conduct of agency business. Personal papers are excluded from the definition of Federal records and are not owned by the Government. Examples of personal papers include: (1) materials accumulated by an official before joining Government service; (2) materials relating solely to an individual's private affairs, such as outside business pursuits, professional affiliations, or private political associations; and, (3) diaries, journals, personal correspondence, or other personal notes that are not prepared or received in the process of transacting official business.

Employees who leave OPM may take their personal papers with them. However, they must take care not to remove any official records from the office. Personal papers must be kept separate from official records. If information about private matters and agency business appears in the same document, the document must be copied at the time of receipt, with the personal information deleted, and treated as an official record.

6.15.2 Extra Copies of Official Records

The legal definition of records specifically excludes "extra copies of documents preserved only for convenience of reference." These extra copies are nonrecord material, which may be destroyed without NARA approval.

Although these materials cannot be considered personal papers, a Government official may accumulate for convenience of reference extra copies of papers and other materials, which he or she has drafted, reviewed, or otherwise acted upon. When deposited in a research institution, extra copies can serve the needs of historical scholarship.

Government officials may be permitted to retain these extra copies, provided that the retention would not: (1) diminish the official records of the agency; (2) violate confidentiality required by national security, privacy, or other interests protected by law; or (3) exceed normal administrative economies. See 36 CFR 1222.34(f)(2).

6.15.3 Penalties for the Unlawful Removal of Records

Federal Agencies are required to notify agency officials that: (1) the alienation and destruction of records in agency custody is governed by specific provisions of [Title 44 U.S.C., Chapter 33](#), and (2) criminal penalties are provided for the unlawful removal or destruction of Federal records ([18 U.S.C. 2071](#)) and for the unlawful disclosure of certain information pertaining to the national security ([18 U.S.C. 793](#), [794](#), and [798](#)).

Heads of Federal Agencies are required to notify the Archivist of the United States of any actual or threatened unlawful removal or destruction of records in their custody. The Archivist is responsible for assisting agency heads in initiating action through the Attorney General for the recovery of records unlawfully removed. See [36 CFR 1228.104, Reporting](#).

7. ELECTRONIC RECORDS

7.1 Definition of Electronic Records

An electronic record is any information that is recorded in a form that only a computer can process and that satisfies the definition of a Federal record (see [44 U.S.C. 3301](#); ⁶⁷ [Section 4, Records Creation and Receipt](#); and [Appendix B, Glossary](#)).

Electronic records may include data files and databases, machine-readable indices, word processing files, electronic spreadsheets, web records, records generated from VOIP, iPad, and other state of the art electronic systems, electronic mail and electronic messages, as well as other text or numeric information requiring the use of a computer or other electronic device to create, retrieve, analyze, transmit, or delete records.

Electronic records also may include records derived from Internet Web sites and Web 2.0 applications such as blogs, wikis, Web portals, mashups (e.g., Google Maps; see [Glossary](#)), microblogs (e.g., Twitter), and videoblogs (e.g., YouTube).⁶⁸

7.2 Electronic Records Management Controls

OPM is required to manage its electronic records in accordance with [36 CFR 1234](#), [Electronic Records Management](#). The following types of **records management controls** are needed to ensure that Federal records in electronic information systems provide adequate and proper documentation of agency business for as long as the information is needed. These controls must be incorporated into the electronic information system or integrated into a recordkeeping system that is external to the information system itself. These controls are:

⁶⁷ Also see [36 CFR 1234.2, Definitions](#).

⁶⁸ See [Implications Of Recent Web Technologies For NARA Web Guidance](#) for a discussion of these and other web technologies. See also [44 U.S.C. 3501\(207\)\(e\)](#).

- **Reliability:** Controls to ensure a full and accurate representation of the transactions, activities, or facts to which they attest and can be depended on in the course of subsequent transactions or activities.
- **Authenticity:** Controls to protect against unauthorized addition, deletion, alteration, use, and concealment.
- **Integrity:** Controls, such as audit trails, to ensure that records are complete and unaltered.
- **Usability:** Mechanisms to ensure that records can be located, retrieved, presented, and interpreted.
- **Content:** Mechanisms to preserve the information contained within the record itself that was produced by the creator of the record.
- **Context:** Mechanisms to implement cross-references to related records that show the organizational, functional, and operational circumstances about the record, which will vary depending on the business, legal, and regulatory requirements of the business activity.
- **Structure:** Controls to ensure the maintenance of the physical and logical format of the records and the relationships between the data elements.

The records management controls must be planned and implemented in the system as part of the capital planning and systems development life cycle processes.

All records in the system must be retrievable and usable for as long as the NARA-approved retention period dictates. If the records will need to be retained beyond the planned life of the system in which the records are originally created or captured, the migration of records and their associated metadata to new storage media or formats must be planned and budgeted, in order to avoid loss due to media decay or technological obsolescence. See [36 CFR 1234.30](#) for more information.

A standard interchange format (e.g., ASCII or XML) must be provided when needed to permit the exchange of electronic documents between offices using different software or operating systems.

7.3 Electronic Recordkeeping Systems

Recordkeeping systems, whether electronic or paper-based, must be cost effective, easy to use, provide the required information when needed, and retain the records for the required length of time. Electronic records stored outside an approved electronic recordkeeping system are more vulnerable to undetected alteration or loss of information than are paper record systems. Every time an electronic word processing document, spreadsheet, or database is opened, the record can be altered, assuming that the user

possesses the proper password and rights. Even those without passwords and rights can gain access to electronic records by exploiting security weaknesses.

Electronic Recordkeeping systems remove these vulnerabilities. Careful management of procedures and equipment for electronic records is required to ensure the continuing accuracy and availability of the information.

Recordkeeping functionality may be built into the electronic information system or records can be transferred to an electronic recordkeeping repository, such as a DoD-5015.2 STD-certified product. The following functionalities are necessary for electronic recordkeeping:

- **Declare records.** Assign unique identifiers to records.
- **Capture records.** Import records from other sources, manually enter records into the system, or link records to other systems.
- **Organize records.** Associate records with an approved records schedule and disposition instruction.
- **Maintain records security.** Prevent the unauthorized access, modification, or deletion of declared records, and ensure that appropriate audit trails are in place to track use of the records.
- **Manage access and retrieval.** Establish the appropriate rights for users to access the records and facilitate the search and retrieval of records.
- **Preserve records.** Ensure that all records in the system are retrievable and usable for as long as needed to conduct agency business and to meet NARA-approved dispositions.
- **Carry out disposition.** Identify and transfer permanent records to NARA based on approved records schedules. Identify and delete temporary records that are eligible for disposal. Halt the disposition of records through the application of records holds or freezes when required.
- **Ensure that backup systems are in place.** System and file backup processes and media do not provide the appropriate recordkeeping functionalities and must not be used as the agency electronic recordkeeping system.

7.4 Electronic Mail Records⁶⁹

Perhaps the most ubiquitous form of electronic record is electronic mail, or email. Because email messages are so easy to send and receive, they are difficult to manage.

⁶⁹ See [36 CFR 1234.24, Standards for managing electronic mail.](#)

Unless strict email recordkeeping procedures are established, it quickly becomes very difficult to integrate email records into recordkeeping systems.⁷⁰

The most important fact about email is that each email message may be a record.

Like other electronic records, the best way to determine whether an individual email is a record is to decide whether it fulfills the definition of a record in 44 U.S.C. 3301.⁷¹

Another way is to ask yourself the following questions:

- Is an email that you sent or received related to your duties as an OPM employee or contractor?
- Does an email that you received call on you to take an action or make a decision on behalf of OPM?
- Does an email that you sent explain, justify, or document an action or decision relating to your duties or the duties of another employee or contractor at OPM?

If you answered “yes” to any of these questions, the email is a record. If you answered “no” to them all, the email is not a record.

7.4.1 Email Records Management Systems

At present OPM has no automated system for managing email as records. NARA encourages agencies to implement an email records management system.⁷²

Such systems must have the capacity to:

- Group email records into classifications that reflect the agency’s business functions.
- Schedule and provide for the disposition of email records.
- Ensure ease of access to email records.
- Retain email records and their transmission and receipt data for the entirety of the appropriate retention periods.
- Permit the transfer of permanent email records to NARA.⁷³

Email applications such as Outlook, may only be used as an email “records management system” for emails with very short retention periods of 180 days or less. These would be classified as transitory records (see Glossary entry). Since most of OPM’s email records

⁷⁰ See [36 CFR 1234.24\(a\)\(4\) and \(b\)](#).

⁷¹ See 36 CFR [1234.2, Definitions](#), [1234.10, Agency responsibilities](#), and [1234.24, Standards for managing electronic mail records](#).

⁷² See [36 CFR 1234.24\(b\)\(3\)\(i\)](#).

⁷³ See [36 CFR 1228.270, Electronic records](#).

do not fit in this transitory category, OPM personnel and contracts must print out, file the email, its attachment, and transmission, and receipt data.⁷⁴

7.4.2 Email Records Management FAQs⁷⁵

a. Emails as Records

When are email messages records?

Treat email messages the same way you treat paper correspondence. An email message is a record if it documents the OPM mission, provides evidence of an OPM business transaction, or matches the definition of a record found at 44 U.S.C. 3301.

Do I have to manage incoming and outgoing email as records?

Yes, you need to manage both incoming and outgoing email. The reason is that both sender and recipient of email messages are responsible for documenting their activities and those of their organizations.

Is it appropriate to conduct OPM business using email?

You should use email to conduct OPM business only when you are reasonably sure that the message will not be altered after transmission. Consider the nature and sensitivity of the message, the technology involved, and the people with whom you are communicating when you decide to use email for business. And you must be mindful to handle all Personally Identifiable Information, appropriately.

Can I use a non-OPM account to send or receive OPM email?

No, you cannot not use any outside email system to conduct official agency business.⁷⁶

Are instant messages (IM) records?

Yes, in certain circumstances. If the messages substantiate your work, you must treat them the same way you would any email record. You need to capture the text of the message, as well as who the message is to or from, and the date and time. Also, due to the informal and sometimes cryptic nature of IM, it may be necessary to transcribe or capture the message in another format much as you would for a telephone conversation or other verbal communication if it is needed

⁷⁴ See [36 CFR 1234.24\(b\)\(2\)](#), [1234.24\(b\)\(3\)\(ii\)](#), and [1234.24\(c\)](#).

⁷⁵ These FAQs are based on the [Environmental Protection Agency's Frequent Questions About Email And Records](#).

⁷⁶ See [36 CFR 1234.24\(a\)\(4\)](#).

to document your activities. Finally, it is important to be careful if you use a non-OPM IM product to communicate with external users, as doing so could result in unauthorized disclosure of information.⁷⁷

If an email record is sent to several recipients, which copy is the official record?

If you take any official action related to a message, and if the message is needed for adequate and complete documentation of the action, the message is a record in your office, regardless of whether copies are retained elsewhere. If the record is already in your office's official files, then your copy is not a record and you may delete it. If you receive a message only for information and do not take action related to it, your copy is not a record and may be deleted when you no longer need it.

Do these email guidelines apply to OPM contractors?

Yes, these guidelines apply to OPM contractors as well as OPM employees.

b. Saving Complete Email Messages

Are there special requirements for retaining email messages as records?

The basic requirements that apply to all records apply to email records as well. However, there are some specific requirements for records made or received through email. You must make sure that:

1. The email record includes transmission data that identifies the sender and the recipients and the date and time the message was sent or received;
2. When an email is sent to a distribution list, information identifying all parties on the list is retained for as long as the message is retained; and
3. If the email system uses codes or aliases to identify senders or recipients, a record of their real names is kept for as long as any record containing only the codes or aliases. For example, if you are communicating with someone via the Internet (e.g., a grantee or researcher), and their email address does not indicate who he or she is (e.g., the address is JerryR@...), then a record must be kept of who they are.

Must I keep attachments to an email message? Are they records as well?

Yes, email attachments are considered records and must be kept. If a message qualifies as part of the documentation of your activities, you must ensure that

⁷⁷ See also: NARA's [Frequently Asked Questions About Instant Messaging](#).

related items that provide context for the message are maintained as well. This includes attachments. You must keep them under the same conditions you would if they were paper attachments to a paper memo or incoming letter.

If my outgoing message is a record, should I ask for a return receipt to make sure the intended recipient received it?

It is not necessary to ask for a return receipt or read receipt in email any more than it is necessary in hard copy. We don't send all letters by certified mail. If it is important to document the time that a message was opened, then treat your email as if it were certified mail and request the recipient to use the read receipt feature.

Do I need to retain both the original message and the reply?

Yes. The simplest way to ensure comprehension of email messages is to incorporate the original message in any reply and maintain them as a unit. If emails are sent back and forth and the most recent message has the entire sequence of messages, you need to keep the original email with attachment and then the final comprehensive message – which includes the previous messages and replies, and transmission and receipt data such as the sender, recipients, date, and time that are necessary for a complete record.

c. Keeping Email Messages

How long do I need to keep email records?

Keep email records in accordance with your office's file plan and the OPM records schedules.

What if the message does not qualify as a record?

Delete emails that are not records when they are no longer of use.

Where do I keep Email records?

Because OPM does not have an email electronic records management system, emails must be printed out and filed in accordance with the schedule associated with the record.

Consequently, OPM offices must establish a print-and-file system for email records.⁷⁸ You may maintain very short-term email records in OPM's email system. These short-term records must have a retention period of less than 180 days.⁷⁹

Can email records be kept on backup tapes or disks?

No. Backups created to facilitate restoration of a system or file in case of accidental or unintentional loss are generally ill suited for recordkeeping purposes.⁸⁰

Do I need to retain both an electronic and hard copy of the same email message?

OPM does not have an electronic recordkeeping system for email. Therefore, the email must be printed and kept as a record in accordance with the appropriation disposition schedule. If it is a transitory record, then you may delete the email after 180 days.

For guidance on transferring permanent email records to NARA, see NARA's [Expanding Acceptable Transfer Requirements: Transfer Instructions for Existing Email Messages with Attachments](#).

7.4.3 Multiple E-Mail Accounts and Personal E-Mail accounts

Having multiple E-Mail accounts and the use of personal e-mail accounts to conduct agency business are not authorized at OPM.

7.5 Maintaining Electronic Information Systems

An Electronic Information System is an automated system that contains and provides access to Federal records and other information. This information may be administrative or programmatic and whose functions include collecting, storing, assembling, processing, transmitting, and disseminating information electronically according to defined procedures.⁸¹

The Records Officer, together with the Records Coordinators, must conduct annual inventories of OPM's electronic information systems and review the systems for conformance to established agency procedures, standards, and policies as part of the periodic reviews required by [44 U.S.C. 3506](#). The review must determine if the records have been properly identified and described, and if the schedule descriptions and

⁸⁰ See [36 CFR 1234.24\(c\)](#). Email may be stored in electronic off-line storage that meets the requirements of [36 CFR 1234.30\(a\)](#).

⁸⁰ See [36 CFR 1234.24\(c\)](#). Email may be stored in electronic off-line storage that meets the requirements of [36 CFR 1234.30\(a\)](#).

⁸⁰ See [36 CFR 1234.24\(c\)](#). Email may be stored in electronic off-line storage that meets the requirements of [36 CFR 1234.30\(a\)](#).

⁸¹ See NARA Bulletins [2006-02](#) and [2008-03](#).

retention periods reflect the current informational content and use. If the annual inventory reveals substantial discrepancies in record identification, description, or retention periods, Records Coordinators must submit an SF 115, Request for Records Disposition Authority, to the Records Officer.

For more information, see [NARA Bulletin 2010-02, Continuing Agency Responsibilities for Managing Electronic Records](#), particularly Attachment 1, Techniques for Scheduling agency Electronic Records Systems.⁸²

7.6 Storing and Testing Permanent Electronic Records

You must maintain the storage and test areas for electronic records storage media containing permanent and unscheduled records in compliance with [36 CFR 1234.30](#) and [36 CFR 1228.270](#).

7.7 Disposition of Electronic Records

OPM's policy on the disposition of electronic records is as follows:

If an electronic record is converted to paper and the paper record is used to indicate concurrences and final signature, then this is considered the official record copy of that particular action. You must maintain, destroy, or archive the paper record in accordance with OPM's approved disposition schedule for that particular record series. You may delete the information on the electronic medium when it is no longer needed to create hard copies.

If an electronic record is not converted to paper, then the electronic record becomes the record copy. You must maintain the electronic record for the same period of time as if it were hard copy. If the electronic record is a temporary record, it must be destroyed after it has reached the end of its retention period.⁸³ You must transfer permanent electronic records to NARA in accordance with [36 CFR 1234.22\(a\)\(4\)](#) and [36 CFR 1228.270\(b\)](#), and retain a copy of the records until you receive official notification that NARA has assumed responsibility for continuing preservation of the records.⁸⁴

7.7.1 Decommissioning Legacy Systems

7.8 Using Electronic Media to Transfer Records to the National Archives

You must use only media that are sound and free from defects for transfers to the National Archives of the United States. When permanent electronic records may be disseminated through multiple electronic media (e.g., magnetic tape, CD-ROM) or mechanisms (e.g., File Transfer Protocol (FTP)), OPM and NARA must agree on the

⁸² See also NARA's [Tips For Scheduling Electronic Databases](#).

⁸³ See [36 CFR 1234.34 Destruction of Electronic Records](#).

⁸⁴ See also [General Records Schedule 20 Electronic Records](#) and [NARA's Electronic Records Management \(ERM\) Guidance On The Web](#).

most appropriate medium or method for transfer of the records to the National Archives.⁸⁵

7.9 Use of Compact Disk-Read Only memory (CD-ROM) and Optical Disk Systems to Store and Transfer Federal Records

The following contains NARA's policies on the use of CD-ROM and optical disk technology to transfer electronic records to the National Archives. They apply only to those CD-ROM's that contain the record copies of documents that have been scheduled for transfer to and preservation in the National Archives in accordance with a NARA-approved records schedule. They do not apply to the use of CD-ROM for electronic publishing, in which the CD-ROM is used instead of paper for document publishing. OPM organizations must contact OPM's Records Officer (Office of the Chief Information Officer) whenever they plan to use CD-ROM or optical disk systems to store or transfer records

7.9.1 CD-ROM Policy

NARA accepts electronic records for transfer to the National Archives using CD-ROM provided they are:

- In conformance with the International Standards Organization (ISO) 9660 standard;
- In compliance with the American Standard Code for Information Interchange (ASCII) standard as defined in the Federal Information Processing Standard 1-2 (11/14/-84);
 - Not dependent on control characters or codes that are not defined in the ASCII character set;
- Not compressed unless the software to decompress the files is provided;
- Individually addressable; and
- In compliance with the documentation requirements of 36 CFR 1228.270(c)(2).

In some cases, permanently valuable electronic records exist on CD-ROM and also on other media such as magnetic tape. In these cases, OPM and NARA will mutually agree on the most appropriate medium for transferring the records to the National Archives. OPM will transfer the necessary documentation for the files contained on the CD-ROM's that are being accessioned into the Center for Electronic Records.

NARA assumes responsibility for the preservation of CD-ROM files that meet the above criteria. When requested, NARA will provide access to any electronic records preserved in the National Archives and will replicate them on any medium offered by NARA for

⁸⁵ See 36 CFR [1228.270\(b-e\), Electronic Records](#), and [36 CFR, 1234 Electronic Records Management](#), for more information.

copies of accessioned electronic records, subject to legal restrictions. Legal restrictions include copyright, licensing, or special distribution arrangements. NARA will provide copies of any copyrighted software contained on a CD-ROM only when there is an applicable license or the software has been placed in the public domain.

7.9.2 Optical Disk System Policy

NARA has encouraged Federal Agencies to use optical disk technology to enhance their information management operations. It recognizes the potential benefits of this technology for storing and retrieving large quantities of information.

NARA will accept permanent records for transfer to the National Archive on the following types of optical media:

1. Optical disks that meet the criteria listed in Subsection 7.9.1 CD-ROM Policy;
2. Analog videodiscs that typically contain photographs, provided they do not require any interactive software or non-standardized equipment. Original photographs appraised as permanent and copied onto a videodisc must be scheduled for transfer to the National Archives along with a copy of the videodisc; and
3. Audio compact disks.

7.9.3 OPM Policy

1. Permanent Records

OPM may use CD-ROM and optical disk systems for the storage and retrieval of permanent records while the records are in OPM's legal custody. After permanent records are copied onto CD-ROM or an optical disk, if the records are no longer needed for current business in OPM, the records must be transferred to a Federal records center or, in the case of records on electronic media, to the National Archives.

2. Temporary Records

Records appraised by NARA as temporary may be stored on any medium, including CD-ROM and optical disks that ensures maintenance of the information until the retention period expires. NARA approval is not required to convert such temporary records to CD-ROM or optical disks and disposal of the original paper or other media.

3. OPM Must Obtain NARA Approval To:
 - a. Destroy original permanent or unscheduled records after copying onto CD-ROM or optical disks. Approval for destruction will depend on the usefulness of the form transferred to NARA by comparing it to the original and the nature of the media used to transfer the records to NARA.

The transfer of permanent records stored on CD-ROM or optical disks to the legal custody of the National Archives must be on a medium acceptable to NARA at the time of transfer. OPM must certify that the CD-ROMs or optical

disks meet the requirements listed in Subsection 7.9.1 above, or that OPM will convert the images to a medium that meets the standards specified in 36 CFR Part 1228, Subpart B – Scheduling Records, before transfer to NARA's legal custody.

- b. Transfer permanent records in CD-ROM or optical disk format to the National Archives. (This requirement does not apply to records that are already scheduled in electronic format for transfer to the National Archives.)
- c. Disposition schedule videodiscs and audio compact disks

7.10 Scanned Records

As part of NARA's electronic government (e-Gov) initiative, and in cooperation with other Federal Agencies, NARA issued guidance to supplement requirements in 36 CFR 1228.270, Electronic Records, for transferring permanent electronic records to NARA. This guidance expands currently acceptable formats to enable the transfer of existing scanned images of textual records to NARA. The guidance does not apply to "born digital" images or scanned images of primarily non-textual records (e.g., maps and photographs).

Scanned images are a priority electronic records format identified by NARA and partner agencies as part of the Electronic Records Management (ERM) initiative.⁸⁶ A major goal of this initiative is to provide the tools for agencies to access electronic records for as long as required and to transfer permanent electronic records to NARA for preservation and future use by the Government and citizens. Scanned images are the second of three formats examined under this ERM e-Gov initiative; the other priority formats include email with attachments and electronic records in Adobe's Portable Document Format (PDF).

Subsections 7.10.1 through 7.10.5 below provide transfer requirements specifically for existing scanned images that have been appraised or scheduled for permanent retention in electronic (i.e., scanned) form. These requirements address acceptable scanned image file formats, image quality specifications, transfer documentation, and related information on how to transfer these records to NARA. If you have existing permanent scanned images that do not meet the image quality specifications in this guidance, contact the OPM Records Officer.

7.10.1 Transferring Scanned Records to NARA

NARA will accept transfers of scanned images that have been scheduled as permanent records on an SF 115, Request for Records Disposition Authority. To facilitate

⁸⁶ See NARA's [Electronic Records Management Initiative](#) (ERM). NARA's partner agencies in the Initiative are EPA (Enterprise-wide ERM) and the Department of Defense (Electronic Information Management Standards).

preservation processing and future access to these records, agencies must comply with the following minimum requirements.⁸⁷

Image File Format

NARA will accept scanned images in the following file formats:

Tagged Image File Format (TIFF), in 'II' format, versions 4.0 (April 1987), 5.0 (October 1988), and 6.0 (June 1992).

Graphics Interchange Format (GIF), versions 87a (June 1987), and 89a (July 1990).

Basic Image Interchange Format (BIIF), International Standards Organization (ISO) Standard 12087-5, Part 5 (December 1998).

Portable Network Graphics (PNG), version 1.0 (October 1996).

NARA will periodically update this set of acceptable formats and versions.

NARA prefers uncompressed images. With prior consultation between NARA and the transferring agency, NARA may accept compressed images created using a lossless compression method (e.g., ITU Group 4, LZW) when it is impractical or technically impossible to transfer uncompressed files (e.g., due to limitations on bandwidth or storage media capacities). NARA will not accept images created using lossy compression⁸⁸ techniques because the potential information loss that can result from compression can make such images unsuitable for archival preservation.

(See [NARA's Frequently Asked Questions \(FAQ\) About Digital Audio and Video Records](#) for more information about lossy compression)

7.10.2 Expanding Acceptable Transfer Requirements: Transfer Instructions for Existing Permanent Electronic Records Scanned Images of Textual Records

A. Acceptable Image Quality Specifications

Scanned images of textual records transferred to NARA must meet minimum requirements for scanning resolution and pixel (bit) depth to support archival preservation and continued use. See <http://www.archives.gov/records-mgmt/initiatives/scanned-textual.html> for specifics,

B. Transfer Documentation

⁸⁷ See NARA's [Expanding Acceptable Transfer Requirements: Transfer Instructions For Existing Permanent Electronic Records Scanned Images Of Textual Records](#), and [Transferring Permanent Electronic Records To NARA- Answers To The Top 5 Questions](#) (NARA).

⁸⁸ Lossy compression is a method of reducing the size of a file by discarding data without rendering the resulting file unusable. Lossless compression accomplishes the same thing without loss of data.

This subsection supplements the transfer documentation requirements in 36 CFR 1228.270(e) to ensure that transfers of scanned images of textual records are clearly identified and described. Agencies must also submit a signed SF 258, Agreement to Transfer Records to the National Archives of the United States, as required by 36 CFR 1228.272. See <http://www.archives.gov/records-mgmt/initiatives/scanned-textual.html> for specifics.

For inspections conducted after the effective date of this directive, you must use one of the quality sampling methods presented in the American National Standards Institute (ANSI)/Association for Information and Image Management (AIIM) standard, Sampling Procedures for Inspection by Attributes of Images in Electronic Image Management and Micrographic Systems (ANSI/AIIM TR34-1996).

7.10.4 Transfer Mechanisms⁸⁹

You must transfer scanned images to NARA as uncompressed files and un-aggregated files. In addition to the approved transfer media listed in 36 CFR 1228.270(c), you may transfer records on Digital Linear Tape (DLT) Type IV or through File Transfer Protocol (FTP).⁹⁰ See <http://www.archives.gov/records-mgmt/initiatives/scanned-textual.html> for specifics.

7.10.5 Portable Document Format (PDF)

PDF is a file format that is used for representing two-dimensional documents in a manner independent of the application software, hardware, and operating system. Each PDF file comprises a complete description of a fixed-layout two-dimensional document that includes the text, fonts, images, and graphics that compose the documents. Lately, three-dimensional drawings can be embedded to PDF documents with Acrobat 3D using U3D or PRC and various other data formats.

Using these advanced versions of PDF has presented problems for the long-term and permanent storage of scanned images. Some functionalities and features recently added to the PDF format are proprietary and support for them cannot be guaranteed over the long term. Therefore, NARA has adopted PDF/A-1, or archival PDF, as the preferred version for images scanned in PDF format.⁹¹

7.10.6 Levels of Access

NARA will provide access to the creating agency and to all researchers requesting scanned images accessioned from Federal Agencies, subject to review of content for FOIA exemptions as is feasible. While compliance with these requirements will improve future access to accessioned scanned images, NARA's ability to provide access to certain

⁸⁹ See [Transfer Of Electronic Records](#) (NARA) and [36 CFR 1228.270. Electronic Records](#).

⁹⁰ See [36 CFR 270\(c\)\(3\)](#) File Transfer Protocol for details.

⁹¹ See NARA's [Frequently Asked Questions \(FAQs\) About Transferring Permanent Records In PDF/A-1 To NARA](#). It is important to recognize that NARA has indicated that PDF/A-1 is the preferred version of PDF, not the preferred imaging format.

Records Management for OPM Internal Administrative

records will vary according to their hardware and software dependencies. At present, NARA provides users with a copy of fully releasable electronic record files on any of the media currently approved by NARA. For scanned images transferred to NARA, the user is responsible for obtaining the necessary hardware and software to view the records. See <http://www.archives.gov/records-mgmt/initiatives/scanned-textual.html> for specifics,

7.10.7 Contact Information

For assistance in scheduling scanned images, or to discuss how to handle permanent scanned images that do not meet the specifications in 36 CFR 1228.270(c)(3), contact the OPM Records Officer in the Office of the Chief Information Officer, who will then contact the agency appraisal archivist in the Life Cycle Management Division of the National Archives in writing prior to the transfer of scanned images. This can be done by sending the Life Cycle Management Division a copy of the SF 135 submitted for FRC approval before transferring the unscheduled records to the FRC. Be sure to include on the SF 135 the date you notified the Life Cycle Management Division, or include the number of a pending SF 115, Request for Disposition Authority. The Life Cycle Management Division's address is 8601 Adelphi Road, Room 2200, College Park, MD 20740.

7.11 Managing Web Records⁹²

Web site operations are an integral part of OPM's programmatic, outreach, and communications activities. The creation of Web sites and their maintenance result in the creation of Web-based records. Most of these records are electronic, but there may be a few paper records as well. Managing OPM's Web records properly is essential to effective Web site operations, especially the mitigation of the risks any agency, including OPM, faces by using the Web to carry out its business. It is the policy of OPM that using the World Wide Web is strongly encouraged in that it provides employees, the general public and stakeholders with a powerful tool to promote transparency, convey information quickly and efficiently on a broad range of topics relating to its mission, activities, objectives, policies and programs. The policy applies to all OPM World Wide Web and other internet content created/maintained by employees, contractors, and/or their assigns. OPM has identified 13 policy positions to implement best practices with regard to establishment, maintenance and administration of its social media. The entire web policy can be accessed on the intranet.

Communications & Public Liaison (CPL) will serve as the website owner and final authority on all content.

Program offices are responsible for assuring all content proposed for posting comply with this policy and all other related public publishing policies. They will also establish a process to identify information that is appropriate for posting to websites and ensure it is consistently applied. Program offices will:

- Ensure all information placed on publicly accessible websites is properly reviewed for security, levels of sensitivity and other concerns before it is released.
- Ensure approved OPM security and privacy notices and applicable disclaimers are used on all websites under their purview.

⁹² See [NARA Guidance On Managing Web Records](#).

- Ensure all information placed on publicly accessible websites is appropriate for worldwide dissemination and does not place national security, OPM personnel and assets, mission effectiveness, or the privacy of individuals at an unacceptable level of risk.
- Ensure procedures are established for management oversight and regular functional review of the website.
- Ensure operational integrity and security of the computer and network supporting the website is maintained.
- Ensure that reasonable efforts are made to verify the accuracy, consistency, appropriateness, and timeliness of all information placed on the website.
- Provide the necessary resources to adequately support website operations to include funding, equipping, staffing and training.
- Provide a mechanism for feedback reporting within the program offices, to include "Lessons Learned" suitable for all OPM program offices.

The Chief Information Officer (CIO) and Communications & Public Liaison (CPL) will monitor website compliance with these policies as part of their oversight of agency web information resource management and may remove content that does not comply with this policy and current agency operating procedures and guidelines. The CIO and offices within the CIO's charge will:

- Provide policy and procedural guidance with respect to establishing, operating and maintaining websites.
- Maintain liaison with the CPL to provide policy oversight and guidance to ensure the effective dissemination of personnel information via the Internet.
- Provide technical support consistent with existing CIO responsibilities.
- Develop and maintain training guidance and requirements that address information security on the Web.
- Approve and publish instructions and publications, as necessary, to guide, direct, or help website activities, consistent with this policy.
- Provide a mechanism for feedback reporting across OPM, to include "Lessons Learned" and the identification of useful automated tools to aid in the conduct of multi-disciplinary security assessments of websites.
- Promote compliance with this policy.

- Establish information management procedures consist with the *Federal Records Act as amended*, 44 USC and 36 CFR, the Privacy Act (PA), the Paperwork Reduction Act (PRA) and other applicable guidance.

Office of General Counsel will provide legal guidance regarding the interpretation of OMB policy and the rules of law applicable to records management, as necessary..

NARA Guidance on Managing Web Records is intended to assist Records Officers and other staff with Web records management duties, as well as webmasters, IT staff, and others with a role in Web site management.

The Guidance contains valuable information on the following:

- How agencies are currently using the Web
- Who has Web-records responsibilities
- Statutory and regulatory requirements applicable to agency Web records management
- What Federal Web site-related records are, and how they are managed,
- How to determine what Federal Web site-related records are “trustworthy.”
- Risk assessment
- Risk mitigation
- Web site-related records scheduling

7.12 Social Media and Records Management

Social media applications (i.e., blogs, wikis, game developedia, Facebook, and YouTube), are relatively recent tools developed since the advent of the Internet. These applications have made possible a dynamic and democratic proliferation of data and information not previously possible. The rise in use of these tools by Federal Agencies poses a challenge to records management. Materials posted on third party sites and agency blogs may also constitute Federal Records. . NARA has issued guidance on creating Web 2.0 policy.

Federal Agencies are already required by 44 U.S.C. Chapters 31 and 35, Office of Management and Budget (OMB) Circular A-130 and NARA regulations in 36 CFR Chapter XII, Subchapter B to have an effective and comprehensive records management program for all of their records. To the extent that these new Social Media applications produce Federal records, these statutes, regulations and guidance will apply to them as well.

OPM’s Records Management Division will ensure that there are updates to legacy records schedules and that unscheduled electronic records, including Web 2.0 applications, are properly scheduled. OPM Records Management seeks to build records management services into software applications and adopt electronic recordkeeping,

electronic content management, and electronic archiving practices to address social networking services. OPM's Records Management Division advocates appointing knowledge counsels as points of contact in each headquarters or regional component and to function as a resident expert and repository of information on the IT and recordkeeping practices of the agency.

To aid OPM staff and contractors in managing records derived from Social Media applications, this Directive relies on NARA guidance.⁹³ Specifically, we refer OPM staff and contractors with records management duties to NARA's publication titled *Implications of Recent Web Technologies for NARA Web Guidance*.

This publication contains information and guidance about:

- Web Portals (i.e., OPM's THEO)
- Really Simple Syndication (RSS) Feeds
- Web Logs, or Blogs, and
- Wikis

These four technologies are described and compared on the following bases:

- Interactive aspects
- Collaboration
- Aggregation
- Incremental content, and
- Content replication.

Other items of interest discussed in the guidance are:

- Some Example Questions for Content Managers,
- Responsibilities,
- Risk Assessment,
- Scheduling, and
- Transfer Instructions.

There is also a helpful Glossary at the end of the guidance.

⁹³ See [Implications Of Recent Web Technologies For NARA Web Guidance](#).

All Federal agencies, OPM included, must continue to manage content created with these and other applications in compliance with NARA's records management guidance, including its Web management and transfer policies.

7.13 Cloud Computing

FOIA, E-DISCOVERY, AND LITIGATION FREEZES AND HOLDS

8.1 Records Management and the Freedom of Information Act (FOIA)

The Freedom of Information Act (FOIA), 5 U.S.C. 552, gives the public the right to request access to Federal agency records or information. All Federal agencies, OPM included, are required to disclose agency records to the public unless the records are protected by one or more of FOIA's nine exemptions or three exclusions. The nine exemption categories (see 5 U.S.C. 552(b)) that authorize government agencies to withhold information are:

1. classified information for national defense or foreign policy;
2. internal personnel rules and practices;
3. information that is exempt under other laws (i.e., personally identifiable information [PII] as defined in the Privacy Act of 1974);
4. trade secrets and confidential business information;
5. inter-agency or intra-agency memoranda or letters that are protected by legal privileges;
6. personnel and medical files;
7. law enforcement records or information;
8. information concerning bank supervision; and
9. geological and geophysical information.

8.1.1 Access to Certain Records Without a FOIA Request

OPM makes certain records available without requiring a FOIA request. Such records include the agency's Annual FOIA Report, which can be found at www.opm.gov/efoia, and other documents, which can be found in the agency's Electronic Reading Room, located at www.opm.gov/efoia/html/reading.asp.

OPM's Freedom of Information Act Web page provides access to a list of Freedom of Information Act (FOIA) Contacts within OPM and a link to the U.S. Department of Justice FOIA and Privacy Act Web pages.

8.1.2 Time for Response

FOIA requirements (at 5 U.S.C. 552(a)(6)(A)(i)) demand that Federal agencies make a determination within 20 business days whether to disclose or deny the records requested.

Other processing methods specific to OPM and fees for searching, reviewing, and copying can be found at OPM's [Freedom of Information Act Reference Guide](#) Web page.

8.2 Records Management and Electronic Discovery

Electronic discovery, or e-discovery, refers to the process of discovery in civil litigation of records in electronic format, also referred to as electronically stored information, or ESI. The increased production and persistence of electronic records has prompted Congress and Federal courts to recognize the need to account for electronic records in discovery proceedings. This process of recognition resulted in several amendments to the Federal Rules of Civil Procedure. Chief among them were amendments to Rule [26\(b\)\(2\)\(B\)](#), [26\(f\)](#), and [37\(f\)](#).⁹⁴

- [26\(b\)\(2\)\(B\)](#) – The party from whom discovery is sought must demonstrate to the court's satisfaction that the information requested is not reasonably accessible.
- [26\(f\)](#) – The requirement that both parties to a civil action meet and confer early in the pre-trial proceedings to establish ground rules for the scope (online, [nearline](#), or offline) and format (PDF, TIFF, etc.) of the ESI and how the records will be accessed or searched.
- [37\(f\)](#) – The party from whom the discovery is sought will not be penalized for its failure to produce ESI because it was destroyed as the result of the routine, good-faith operation of an electronic information system. In other words, if the party has an established electronic records management system wherein electronic records are routinely scheduled, destroyed, or transferred to NARA ownership, the destruction of these records will not result in court sanctions. Rule [37\(f\)](#) assumes the records were destroyed not only before a civil action took place, but before there was reason for the party to believe that such an action was in the offing.

8.2.1 E-Discovery Responsibilities

Recent case law and best practices dictate that OPM recognize that it has a continuing responsibility to monitor compliance with electronic records preservation instructions issued by the Department of Justice or the OPM Office of General Counsel (OGC). OPM's response to e-discovery demands must be as quick as possible. To achieve this rapid response ability, it is the responsibility of the Chief Information Officer, the Chief of Records Management, the OPM Records Officer, and Headquarters and Field Office

⁹⁴ The Federal Rules of Civil Procedure can be found at [28 U.S.C. Judiciary and Judicial Procedure – Appendix](#).

Records Coordinators to establish an agency-wide ability to initiate electronic records preservation actions.⁹⁵

Both record and non-record documentary materials in paper or electronic format frequently become the subject of litigation. Employees create and maintain an increasing portion of business information using computers. This electronically stored information (ESI) must be managed alongside traditional paper records to ensure compliance with Federal laws and records management regulations. While not all papers or ESI are agency records, they may nevertheless be relevant evidence subject to discovery that is compelled or sanctioned by a court or administrative tribunal in litigation. Unmanaged and unidentified ESI residing on OPM computers also poses a threat to the Agency's ability to document and reconstruct business and decision-making processes.

The purpose of this policy is to prescribe Agency-wide enterprise policies and responsibilities related to the retention of record and non-record documentary materials, including ESI, for discovery or other litigation-related purposes.

2. REFERENCES

[http://theo.opm.gov/policies/AMS44-3%20\(converted\).pdf](http://theo.opm.gov/policies/AMS44-3%20(converted).pdf) (OPM's Records Management Handbook (May 2003))

36 CFR 1222.12(b)(1) Definition of "Documentary Materials"

Federal Rules of Civil Procedure:

- a. Chapter III, Pleadings and Motions, Rule 16, Pre-Trial Conferences; Scheduling; Management.
- b. Chapter V, Depositions and Discovery, Rule 26(a), General Provisions Governing Discovery; Duty of Disclosure; Required Disclosures; Methods to Discover Additional Matter.

3. SCOPE

The retention policy set forth herein applies to all employees and contractors of OPM and applies to all documentary materials, including record and non-record ESI made, sent, or received in the transaction of OPM business.

4. DEFINITIONS

Discovery: Discovery is the process of identifying, locating, securing and producing evidence, including testimony, , information, and materials for utilization in the legal process. The term is also used to describe the process of reviewing all materials which may be potentially relevant to the issues at hand and/or which may need to be disclosed

⁹⁵ See Baron, Jason R. and Daniel MacDonald. [*E-Discovery & The New Federal Rules Of Civil Procedure: What Agencies Need To Know*](#), The Rocky Mountain Record *Special Edition* (NARA: XIV, 2).

to other parties, and of evaluating evidence to prove or disprove facts, theories or allegations. There are several formalized methods of conducting discovery, the most common of which are interrogatories, requests for production of documents and depositions.

Electronic Discovery (e-discovery): The process of collecting, preparing, reviewing, and producing ESI in the context of the legal process. See Discovery.

Electronic Record: Information recorded in a form that requires a computer or other machine to process it and that otherwise satisfies the definition of a record.

Electronically Stored Information (“ESI”): Any information that is created, received, maintained or stored on local workstations, laptops, central servers, personal digital assistants, cell phones, or in other electronic media. Examples include, but are not limited to: electronic mail (“email”), calendars, word processing documents and spreadsheets, databases, videos, video files, digital images, audio files, text messages, voicemails, activity logs, etc. ESI includes metadata.

Preservation Obligation: The obligation of agencies, managers and individual employees to ensure the preservation of documentary materials that might be or might become relevant to pending or threatened litigation. If the documentary material was created in electronic format, it must be preserved in that original native format.

Litigation Hold: The procedure for locating and ensuring the retention of ESI subject to a preservation obligation. See Appendix A for litigation hold procedures/guidelines.

Record: 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. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference and stocks of publications and of processed documents are not included. (44 U.S.C. 3301)

5. POLICY

The retention period for ESI will be consistent with the National Archives and Records Administration (“NARA”) general records schedules or OPM-specific records retention schedules, as well as Agency policies for records management or with Agency policies for maintaining and retaining data on backup media for purposes such as disaster recovery.

ESI that constitutes a "record" is subject to OPM's records management policies and to the records retention schedules that have been established for each Programoffice. Any ESI containing information that documents the business of the OPM and is, therefore, an

“agency record,” must be moved to an auditable file structure, such as an electronic file designated as containing a record series, or a paper document file in an auditable paper series, in accordance with its applicable Records Disposition Schedule. Records not properly scheduled for disposition may not be destroyed. Records may be destroyed only in accordance with NARA approved records disposition schedules.

A litigation hold for described documents or ESI overrides any records retention schedule or any other agency policy that may otherwise call for the transfer, disposal, or destruction of the relevant documents or ESI until the hold has been removed by the Office of the General Counsel (“OGC”), Office of Inspector General (“OIG”), or other authorized authority that ordered the hold. A litigation hold is generally accompanied by a records search for all responsive information. Records searches initiated pursuant to a hold must be coordinated with agency officials, including the relevant program officials, the information technology (“IT”) staff in the Office of the Chief Information Officer (“OCIO”), and the OPM Records Officer. Each unit head within the affected organization is responsible for notifying its subordinate activities that a hold exists or has been removed. See litigation hold guidelines in Appendix A.

Many IT organizations back up email and other ESI for the purpose of restoring electronic systems in the event of disaster. Any decision concerning retention periods for electronic backup media should be established based upon consideration of reasonably anticipated business needs for data recovery in the event of system failure, as well as upon legal considerations such as the extent the agency or component has otherwise archived the ESI. However, backup tapes are not ideally suited as a record retention mechanism because of the difficulty and expense of reconstituting them to readable format. Thus, agencies are encouraged to seek true archiving solutions for ESI. Additionally, email archived to the individual workstation should not be considered part of the institutional backup – but a part of the individual’s filing system. However, such individually maintained material is potentially discoverable, and therefore may be the subject of a litigation hold.

6. SANCTIONS

Failure to comply with this policy in preserving documents and ESI can result in unfavorable discovery orders, sanctions against the Government, disadvantage to the government's position in litigation or judgment against the Government. It can also result in monetary or other contempt sanctions against individuals who failed to take appropriate steps to locate and segregate information subject to litigation hold. In extreme cases, agency performance based action or disciplinary sanction may be warranted under 5 U.S.C. 4301, et seq. or 5 U.S.C. 7501, et seq.

7. RESPONSIBILITIES

- a. Director, OPM
 - b. Chief Information Officer (CIO)
 - c. OPM Records Officer
 - d. Information Technology (IT) staff
 - e. Office of the General Counsel (OGC)
 - f. Office of the Inspector General (OIG)
 - g. OPM Human Resource Office
 - h. Department of Justice (DOJ)
 - i. Key Individuals
- a. Office of the Chief Information Officer will:
- Advise on records management issues and develop Agency-wide records management policies, procedures, guidance, and training.
 - Advise on backup media management and retention policies, procedures, guidance, and training.
 - Work with program, OGC and OIG staff to help ensure that paper and electronic records and other non-record documentary materials, including ESI, are accessible for e-discovery purposes.
- b. Program Office Heads will:
- Advise on backup media management and retention policies, procedures, guidance, and training.
 - Cooperate with OGC, OIG and OCIO in locating and preserving paper and electronic records as well as non-record ESI subject to a litigation hold.
- c. Agency/Staff Office Records Officers will:
- Develop and maintain the mission area, agency, and staff office records management program in conformance with the Agency's policies and standards.
 - Work with program, IT, and OGC staff to help ensure that paper and electronic records are accessible for e-discovery purposes.
- d. OPM Employees will:
- Maintain paper and electronic records and non-record ESI according to prescribed Agency policy and procedures, including litigation holds.

e. OGC will:

- With regard to litigation holds initiated by OGC, work with program, IT, and Records Management staff to help ensure that paper and electronic records, as well as non-record ESI, is accessible for e-discovery purposes.
- Ensure that the OPM Records Officer is notified of all litigation hold requests and hold removals.

f. OIG will:

- With regard to litigation holds initiated by OIG, work with program, IT, and Records Management staff to help ensure that paper and electronic records, as well as non-record ESI, is accessible for e-discovery purposes.
- Ensure that the OPM Records Officer is notified of all litigation hold requests and hold removals.

Appendix A

DOCUMENTARY MATERIAL HOLD AND SEARCH POLICY GUIDANCE

1. What is the purpose of this guidance? This guidance instructs OPM management and staff on requesting, issuing, implementing, and removing “holds” on OPM operational records in both paper and electronic format and other related documentary materials, including non-record Electronically Stored Information (“ESI”). This guidance also provides additional instructions to OPM staff as to the execution of searches pursuant to a hold.

2. What are the authorities?

- a. 44 U.S.C. 2909
- b. Title 44, U.S. Code, Chapter 33
- c. 36 CFR 1228.54
- d. Federal Rules of Civil Procedure
 - (1) Chapter III, Pleadings and Motions, Rule 16, Pre-Trial Conferences; Scheduling; Management.
 - (2) Chapter V, Depositions and Discovery, Rule 26(a), General Provisions Governing Discovery; Duty of Disclosure; Required Disclosures; Methods to Discover Additional Matter.
- e. The Inspector General Act of 1978, as Amended (5 U.S.C., Appendix 3; § 6(a), “Authority of Inspector Generals; information and assistance from Federal agencies; unreasonable refusal; office space and equipment.”)
- f. DR 1700-002 [HTM] [PDF] (06/17/97) OIG Organization and Procedures

3. To whom does this guidance apply?

This guidance refers collectively to “OPM staff” or “OPM staff members,” who include:

- a. All employees;
- b. Contractors where contracts specify which documentary deliverables or other ESI belong to the Government.

4. What is a hold or search?

A “hold” is an agency’s temporary suspension of disposition action(s) related to documentary materials, as well as segregation and preservation of such materials, because of legal, audit, or investigative needs. Documentary materials, regardless of physical location, are required to be kept for as long as a hold is in place. Non-compliance with a hold could result in penalties on individual staff (see paragraph 16) or

on OPM as an agency (see paragraph 17). Subsequent to, or contemporaneous with, the issuance of a hold, the agency may be requested to “search” the held material for specific, relevant documentary material, and to segregate it for safekeeping.

5. Is a freeze considered a type of hold?

Yes. A “freeze” is a more specific implementation of the broader “hold” concept. A freeze refers to a set of standard procedures whereby a Federal Records Center (“FRC”) temporarily suspends disposition actions for an agency’s records and other documentary materials that are in the physical custody of the FRC, but for which legal custody resides with the originating agency. Example: OGC and/or the OPM Records Officer issues a hold on operational records and other documentary materials related to a specific personnel action in litigation. The majority of these records and materials are maintained in office space. However, some affected operational records are stored at the FRC. Upon receiving the OPM Records Officer’s request letter and copies of applicable SF 135’s, the Federal Records Center Program temporarily halts disposition actions by placing a freeze on the affected operational records stored at the FRC. Within the FRC, the “freeze” implements the broader “hold” for those records and documentary materials related to the personnel action in litigation.

6. What circumstances may warrant the issuance of a hold? A hold may be issued when:

- a. OPM is a party to a lawsuit that names OPM expressly as a party or in which the United States is participating as a plaintiff or defendant. The Department of Justice (“DOJ”), with the assistance of OGC, acts as attorney for OPM and its officials.
- b. An administrative proceeding, such as a case involving an equal employment opportunity matter, a Merit Systems Protection Board matter, or a contract before the Civilian Board of Contract Appeals may require the preservation of designated records and related documentary materials.
- c. The OIG, independent public accountants, or the Government Accountability Office (“GAO”) conducts a financial, performance, or contract or grant audit.
- d. OIG leads an administrative or criminal investigation.
- e. Congress has requested the production of certain documents as part of its oversight responsibilities.
- f. Another Federal agency with appropriate investigative authority requests a hold (for example, the Office of Special Counsel)
- g. A dispute in any matter gives rise to a reasonable anticipation of litigation.

7. What are “documentary materials”?

According to 36 CFR 1222.12b(1), “documentary materials” is a collective term for records, non-record materials, and personal papers that refers to all media containing recorded information, regardless of the nature of the media or the method(s) or circumstance(s) of recording.

8. What records and other documentary materials may be subject to holds?

This guidance applies to relevant OPM operational records and non-record materials, in all media (see paragraph 9 for types of media), that may constitute evidence or lead to the discovery of relevant evidence in a particular lawsuit, administrative proceeding, audit, or investigation.

- a. Operational records – Those records created or maintained by OPM staff while conducting OPM business.
- b. Non-record materials - Those Government-owned documentary materials that do not meet the statutory definition of “records” (44 U.S.C. 3301) or that have been excluded from coverage by the definition. Non-record materials expressly excluded from the statutory definition of records are:
 - (1) library and museum materials made or acquired and preserved solely for reference or exhibition purposes,
 - (2) extra copies of documents kept only for convenience of reference, and
 - (3) stocks of publications and processed documents
- c. “Working files and similar materials,” including preliminary drafts, rough notes, worksheets, correspondence and memos, reports, and other similar materials (see 36 CFR 1222.34(c)), fall within the scope of “documentary materials” in paragraph 7 above, regardless of whether such materials qualify as OPM operational records. OPM staff must preserve these working files and similar materials if OPM issues a hold.

9. What are the formats and media for records and other documentary materials covered by this guidance?

“Formats” and “media” refer to the physical characteristics of documentary materials. Particular holds, as each case arises, may call for retention of data in various electronic formats or media to be determined. After consultation with the OPM Records Officer, supervisors and managers must provide to their staffs more specific information regarding formats and media for records and other documentary materials subject to a hold. Types of formats and media may include, but are not limited to:

- a. textual (paper);
- b. electronic formats and storage media:

- (1) email messages;
- (2) word processing files, spreadsheets, and databases;
- (3) digital images;
- (4) Web pages;
- (5) network server information, including metadata;
- (6) voicemail messages;
- (7) backup tapes;
- (8) hard drives;
- (9) removable computer storage media (e.g., CD-ROM's, tapes, disks, and cards);
- (10) personal digital assistants (PDA's) and Blackberry-type devices;

- c. photographic;
- d. audiovisual (e.g., videotapes and sound recordings);
- e. cartographic (e.g., maps and architectural and engineering drawings); and
- f. micrographic (e.g., microfilm and microfiche).

10. Who is authorized to issue and remove a hold affecting OPM operational records and other related documentary materials, and authorize a search of such held materials?

A hold or search may be directed by an OGC staff attorney, OIG, an agency human resources representative, an agency civil rights investigator, or the Director or staff office. Any request for a hold by an agency contractor counsel or contractor representative must be made through OGC or the applicable agency human resources office. A litigation hold may be removed by the person or current holder of the position that issued the hold, or that person's supervisor.

11. To whom must a hold or search request be issued?

- a. a. The hold must be addressed to:
 - (1) The agency or staff office unit directly responsible for the program or subject matter that is the subject matter of the hold, i.e., the "owner" of the dispute.
 - (2) Any key individuals or "players" likely to be holding documentary materials relevant to the subject of the hold. Key individuals or key players include persons transactionally involved in the relevant event or dispute, persons having custody of relevant records because of position or opportunity, and any other person who might be called to testify at the trial or hearing of the matter because of his or her knowledge of the matter in dispute.
 - (3) The CIO or equivalent.
 - (4) The OPM Records Officer.

- (5) When applicable, any collateral program or staff office that may manage Agency systems that could reasonably be expected to have relevant documentary evidence (e.g., Office of the Chief Financial Officer (financial and travel transaction records), Agency Administration (procurement transaction records and personnel records)).
- b. The hold must be copied to the deputy administrator for management or equivalent for the involved organization(s).
- c. a copy of the hold may be sent to the agency or staff office head for informational purposes.

12. How is a hold request made?

- a. Request must be in writing - The request for a hold or search must be in writing, signed, and on agency letterhead. An email request alone is not sufficient but an emailed PDF of a signed request on letterhead is.
- b. Scope of hold - The hold should cover only those documentary materials that are responsive to the situation warranting the hold (e.g., litigation, audit, investigation).
- c. Contents of hold - A hold request must include the following information:
 - (1) Basis for the hold (e.g., litigation, audit), including copies of relevant supporting documents (e.g., court order, letter from GAO) if applicable;
 - (2) Disposition action(s) to be suspended;
 - (3) Concise descriptions of documentary materials (including records series, if applicable and known), including information about content (i.e., subject matter and topics), media format, date spans, and volumes;
 - (4) Estimated period of time for the hold or event(s) triggering removal of the hold, if known;
 - (5) Known physical or electronic locations in agency space, including buildings, rooms, interior areas, (e.g., at individuals' workstations, in centralized file cabinets, in agency) email systems, databases and, if applicable, in FRC's; and
 - (6) Names of contact person and alternate who are knowledgeable concerning the subject matter of the hold and can answer questions and provide advice in connection with the execution of the hold.

13. What actions should be taken by the recipient of a hold?

- a. Owner of the dispute or owner of relevant Agency-wide systems - The Director or staff office unit directly responsible for the program or activity that is the subject matter of the hold, i.e., the "owner" of the dispute, or the owner of relevant Agency-wide systems who receives a hold, sends an email or memorandum to staff regarding the reasons for the

hold, suspends disposition action(s), describes affected documentary materials, and likely duration of the hold. Supervisors and managers issue specific instructions for carrying out the hold within their organizations. They must also inform new employees and must periodically remind staff about the hold requirements.

b. Key individuals - Take actions necessary to ensure documentary material responsive to the hold that is within their control is retained in its native format, segregated for production when requested, and that any routine destruction of documentary material that they created or control is halted.

c. Records Officer

(1) Requests a “temporary extension of retention period(s)”

- a. In accordance with 36 CFR 1228.54(c)(1) through (4), the OPM Records Officer sends a letter, signed by the appropriate official, to the Director of the Life Cycle Management Division at NARA requesting approval of a “temporary extension of retention period(s).”
- b. The OPM Records Officer also sends to NARA copies of SF 135’s regarding those operational records and documentary materials that are subject to the hold and stored at any or all FRC’s .
- c. NARA then notifies the OPM Records Officer by letter regarding the formal extension of the retention period.

(2) Notifies NARA if the hold applies to operational records and other documentary materials stored at any or all Federal Records Centers (FRC) - The OPM Records Officer sends to the Assistant Archivist for NR a courtesy copy of the letter that was addressed to NARA(see subpar. a), along with copies of applicable SF 135’s. NARA’s Federal Records Center Program then carries out the hold by placing a “freeze” on disposition actions affecting those subject records and documentary materials stored at the FRC(s).

(3) The CIO determines relevant agency information technology systems that may contain information responsive to the hold and suspends routine disposition, deletion, or destruction of such information, including suspension of any recycling of backup media, as requested by the issuer of the hold, and works with the requester to segregate and preserve responsive information.

14. What happens if resources (budgetary, human, technological, or other) are inadequate to meet the demands of conflicting hold or search requests within the time required?

On occasion it may not be possible for the recipient of a hold or search request, in particular the CIO, to be able to meet all hold or search requests on a timely basis. In the event of such a conflict, the recipient of the hold shall request OGC to prioritize hold and search requests as follows:

- a. In the case of a conflict experienced by the OCIO, OGC shall convene a meeting of appropriate personnel to review and prioritize the competing hold and search requests, in consultation with the Counsel for the IG when one of the competing requests is from OIG.
- b. In the case of all other conflicts, the recipient shall notify the Associate or Assistant General Counsel responsible for legal advice to the program who shall convene a meeting with the appropriate personnel to review and prioritize the competing hold and search requests, in consultation with the Counsel for the IG when one of the competing requests is from OIG.

15. What must OPM staff members do to carry out a hold applying to operational records and related documentary materials maintained in office space?

Until further notice:

- a. Do not destroy or manipulate any documentary materials, including those temporary records that are eligible for destruction in accordance with the OPM Records Schedule or the General Records Schedules.
- b. Follow the supervisor's or manager's instructions about maintaining records and other documentary materials subject to the hold (e.g., centralizing or keeping the records and materials in place; sending the records and materials to OGC, OIG).
- c. Do not transfer permanent records to NARA, unless a transfer is permitted in accordance with the hold instructions.
- d. Do not transfer records to an FRC, unless a transfer is permitted in accordance with the hold instructions.
- e. Do not donate to interested individuals or organizations any documentary materials or those temporary records that are eligible for destruction.

16. What are the consequences if OPM staff members do not preserve operational records and other related documentary materials subject to a hold?

Individual staff could face severe penalties imposed by a court, or agency performance-based action or disciplinary action for not preserving records and documentary materials subject to a hold.

- a. Department of Justice ("DOJ") - Failure to preserve operational records could constitute an unlawful destruction of records that must be referred to the Attorney General under 44 U.S.C. 2905(a) and 3106.
- b. Civil or criminal court - If an OPM staff member fails to comply with a hold that is in place because of a court order, this individual could be individually sanctioned or held in contempt by the court. Finally, destruction of records under

certain circumstances is potentially a criminal violation for which a staff member could be prosecuted under 18 U.S.C. 1519.

17. What are the consequences to OPM, if operational records and other related documentary materials subject to a hold are not preserved?

OPM could be subject to sanctions if records and other documentary materials, deemed as “evidence,” are missing. For instance, the court could employ one or more of the following sanctions:

- a. Issue an adverse finding (e.g., a court order) against OPM on the merits of the case;
- b. Instruct a jury that it is permitted to draw an “adverse inference” against OPM;

Example: In the hypothetical court case, XYZ Corporation v. OPM, operational records and documentary materials pertaining to OPM officials’ communications with XYZ Corporation (from 1999 to 2004) have not been preserved as required by agency policy. The judge then instructs the jury that it may logically conclude (or “infer”) that the content of OPM’s missing records and materials (as “evidence”) would have supported XYZ Corporation’s position against OPM.

- c. Preclude OPM from introducing certain evidence or calling certain witnesses;
- d. Hold individual OPM officials and OPM in contempt; or
- e. Impose monetary sanctions against OPM, or against involved individuals.

18. How is a hold removed?

When the need for the hold has expired, OGC, OIG, or any other official authorized to request a hold under paragraph 10, shall send a memorandum to all of the original recipients of the hold informing them that the hold has been removed and note the explanation for the removal.

19. How is the Federal Records Center Program notified about the removal of a hold on operational records and documentary materials stored at any or all FRC’s ?

The OPM Records Officer sends a letter to the Assistant Archivist, explaining that the hold has been removed.

8.3 Records Management and Litigation Holds and Freezes

The e-discovery process described above often results in litigation holds or freezes or both. It is important for OPM records management personnel to know the difference between these two processes. A litigation hold is not the same thing as a litigation freeze.⁹⁶

8.3.1 Litigation Holds

A litigation hold, sometimes called a records hold or legal hold, usually involves the preservation of active records in agency custody. A hold can be placed on one or more record series for a variety of administrative, legal, or fiscal reasons. The result of the hold is that the affected records are kept at the agency and not retired to a FRC or destroyed.

It is possible for records stored at a FRC to be affected by a hold. If this happens, the OPM office or program that owns the records must notify both OGC and the Records Officer. It is then the responsibility of the Records Officer to notify the FRC that the records are subject to a hold. Because a records hold does not alter the disposition or retention period of the records, this responsibility is especially important.

Once the FRC is requested by OPM to place a hold on a series of records, those records are *frozen* for the purposes of disposition and retention. They cannot be destroyed or transferred.

8.3.2 Litigation Freezes⁹⁷

A records freeze, or litigation freeze, usually involves inactive records in storage at a FRC. Agencies wishing to impose a freeze on their records must request NARA to impose the records freeze. The effect of the freeze is to alter the retention of the records placed under the freeze.

For example, an agency might know of an impending litigation where the opposing party wants to examine, for purposes of discovery, a series of records near the end of their retention period. In this instance, the agency could impose a records hold, but such an action would have no effect on the disposition or retention period of the records. The records could still be mistakenly destroyed or, if permanent, their legal ownership transferred to NARA. The imposition of a records freeze has the effect of formally changing the retention period so that the records cannot be destroyed or transferred in error.

⁹⁶ See Subsection 6.8.2 Legal Factors for legal concerns relating to the establishment and maintenance of retention periods, including litigation holds and freezes.

⁹⁷ See NARA's [Office Of Regional Records Services](#) for more information on records freezes.

8.3.3 Requesting a Records Freeze

NARA's authority to grant records freeze requests is founded on 44 U.S.C. 2909 Retention of records. Agency responsibility for requesting records freezes are found in 36 CFR 1228.50 and 1228.54(a)(2). The following procedure must be followed for requesting NARA to initiate a records freeze:

1. OPM Records Officer, following advice from OGC, requests a freeze in writing to:
 - a. Office of Records Services
NARA
8601 Adelphi Road
College Park, MD 20740-6001⁹⁸
 - b. Assistant Archivist for Regional Records Services
Office of Regional Records Services
8601 Adelphi Road
College Park, MD 20740-6001⁹⁹
2. The Office of Records Services or the Office of Regional Records Services forwards the request to the Federal Records Center Program (FRCP).
3. FRCP forwards all freeze requests to Transfer & Disposition (T&D) Coordinator.
4. T&D:
 - a. Verifies authority of freeze action requestor,
 - b. Determines type of freeze action required (new, continuation, additional records affected, partial lifting, or lifting),
 - c. Applies freeze to appropriate records,
 - d. Prepares a freeze implemented memorandum to regions indicating that freezes have been applied,
 - e. Forwards freeze implemented memo to NARA management for concurrence,
 - f. After concurrence, the freeze implemented memo is approved and distributed to regions,
 - g. Regional FRCs receive formal freeze implemented memo, and
 - h. T&D notifies OPM that the freeze request has been approved and processed.

8.3.4 Lifting a Freeze

⁹⁸ Use this address for records stored at WNRC.

⁹⁹ Use this address for records in regional facilities.

As in the preceding procedure, the Records Officer must send letters either to the Assistant Archivist Office of Records Services (Suitland) or the Assistant Archivist for the Regional Records Services (Regional FRCs). The letter must identify the records by transfer number and disposition authority, state that the records are not related to the subject litigation, and request that NARA lift the freeze for those records.

The lift request must include:

- Description of the record series for which the lift is requested,
- Complete citation of the specific provisions of the OPM records schedule and item number or General Records Schedule and item number governing the disposition of the records,
- Statement of the current physical location of the records (found on the SF 135 used to retire the records),
- Records Group (146 for Civil Service Commission and 478 for OPM),
- Specific transfer numbers, if the lift applies only to certain transfer numbers, and
- Justification for lifting the freeze.

9. VITAL RECORDS

9.1 Definition of Vital Records

Vital records are essential to the continuity of OPM operations under national security emergencies or other emergency conditions.¹⁰⁰ Only the most recent and complete sources of vital information are treated as vital records.¹⁰¹ There are two types of vital records:

1. Emergency operating records are those types of vital records essential to the continued functioning or reconstitution of an organization during and after an emergency. Emergency operating records are often divided into three groups or tiers.¹⁰²

In Tier 1 are those records required to get through the emergency and the following 48 hours. Examples are:

- Emergency preparedness plans (such as a continuity of operations plan (COOP),¹⁰³ a disaster preparedness plan, or an occupant emergency plan), emergency telephone tree, delegations of authority, security clearance roster, office blueprints, policy for talking to the media, copy of vital records list, and employee benefit information.

Tier 2 is those records required for the 5-7 days following the emergency. They include:

- System manuals for critical electronic databases, and LANs.
- Records that may be needed to provide employee benefits, such as personnel records, including medical records, and time and attendance records.
- Records that may be needed to get back into the office such as combinations and keys to get into locked areas or equipment, and records recovery information, such as phone numbers of disaster recovery companies.

Tier 3 is those records required for the next 3-6 weeks. They include:

- Records that are needed to work on specific projects critical to OPM's mission. This assumes that the records are unavailable for a prolonged period of time causing long-term displacement of personnel from the normal work site. The most critical projects would need to be continued offsite.

¹⁰⁰ See [36 CFR 1236.14, Definitions](#).

¹⁰¹ See [36 CFR 1236.22, Identification of vital records](#).

¹⁰² The following information is based on the Environmental Protection Agency's [Developing And Maintaining A Vital Records Program, Chapter 2, Vital Records Identification](#).

¹⁰³ See Glossary under *COOP*.

- Any program-specific records on projects that are deemed to be of critical importance and cannot be interrupted. This determination must be made by each office. It is possible that an office may not have any tier 3 records.
2. **Legal and financial rights records** are records required for the preservation of legal rights and interests of individual citizens and of the Federal Government, (these were formerly known as "rights and interests records"). These records require protection but need not be maintained at or in the vicinity of the COOP site, or in paper form, because their need would not be immediate. Legal and financial rights records may include:
- Records containing proof of ownership or financial interest (payroll, leave, social security, retirement, and insurance).
 - Legal proceedings decisions.
 - Contractual obligations.

These records could contain sensitive or classified information.¹⁰⁴

9.2 OPM Vital Records Program

The purpose of the OPM Vital Records Program is to identify, protect, and manage vital records as part of OPM's Continuity of Operations Program (COOP).¹⁰⁵ The Vital Records Program has two objectives:

1. To provide the agency with the information it needs to conduct its business under other than normal operating conditions and to resume normal business operations afterward.
2. To enable agency officials to identify and protect the most important records dealing with the legal and financial rights of OPM and of persons directly affected by OPM's actions.

To implement the Vital Records Program, the Records Officer and Records Coordinators, in coordination with OPM personnel participating in the development of the COOP Plan,¹⁰⁶ must:

- **Conduct contingency planning and risk assessment** (described in more detail in [Section 9.4](#) below).
- **Identify types and levels of risk to their records.** You must consider the sorts of emergencies to which your records center is most prone. They may be climatic,

¹⁰⁴ See Section 9.3, How Do I Identify Vital Records?, for a more complete list of examples.

¹⁰⁵ See [36 CFR 1236](#) generally for Vital Records Programs and [1236.20](#) and [1236.22](#) specifically for Vital Records Program objectives and Vital Records Identification.

¹⁰⁶ See Section 9.4, Contingency Planning and Risk Assessment.

seismic, or national security-related. If your records are located in the basement of a building in the middle of a floodplain, you must factor the risk associated with this fact into the COOP Plan and the Vital Records Program.

- **Prepare a Vital Records Plan**, listing vital (1) emergency operating records and (2) legal and financial rights records. This can either be part of your office's file plan, or it can be compiled separately. In any case, the office file plan and inventory must note what records are vital records. See Subsection 6.4 for information on the Series Inventory.
- **For emergency operating records**, using the Vital Records Plan, identify the records that you would need to take with you out of your office to a COOP site on very short notice, and assume that the building will be out of use for an extended period (more than 2 weeks). To the greatest extent possible, emergency operating records must be pre-placed at the COOP site. If the COOP site is a "hot site" (i.e., a site with power, telecommunications, and computers already installed), electronic copies of vital records must be uploaded to the site. Otherwise, hard-copy vital records or electronic copies on a flash drive, or other data storage device, must be delivered to the site either prior to, or during, the emergency.
- **Designate the person or persons** who will take these records out of the building, and the possible COOP sites to which they will go.
- **For legal and financial rights records**, using the Vital Records Plan, determine how you will protect those records against identifiable risks. For example, vital records could be protected by keeping them in secure locations, duplicating them (if feasible), or dispersing copies to other OPM facilities.
- **Ensure that records are adequately protected, accessible, and easily and immediately usable.**
- Be sure that all **vital electronic systems are backed up onsite**. Copies of vital records must be stored as far as possible from the original records so that in the event of a disaster at one location, there will still be a copy to use. Information resource management (IRM) and records management officials must ensure that adequate information resources are available to conduct critical agency business.

9.3 How Do I Identify Vital Records?

In the context of OPM's emergency management function, the Records Officer and Records Coordinators must annually review the informational content of OPM's records series and electronic records systems. Identify those record series that are emergency operating records and legal and financial rights records, as defined in Section 9.1, Definition of Vital Records, above.

There are a number of opportunities to identify vital records. An initial inventory can be conducted simultaneously with the annual agency-wide series inventory. At the time of

the inventory, Records Coordinators must take note of all series that are identified as vital records. A draft vital records inventory can be compiled from these identifications.¹⁰⁷

Remember that only the most recent and complete sources of the information are treated as vital records. At the same time, you must ensure that the designation of vital records is current and complete.

Examples of vital records are listed below.¹⁰⁸

1. Emergency operating records:

- Emergency plans and directives, or other authorizing issuances, including information needed to operate the emergency operations center and its equipment, and records recovery plans and procedures.
- Orders of succession.
- Delegations of authority.
- Emergency staffing assignments, including lists of personnel, along with their addresses and telephone numbers (and comparable data for alternates), assigned to the emergency operations center or other emergency duties, or authorized access to damaged facilities to assess the extent of damage.
- Emergency operations center access credentials and classified or restricted access container documentation (as required).
- Building plans and building systems operations manuals for all agency facilities.
- Equipment inventories for all agency facilities.
- File plans describing the records series and electronic information systems maintained at official filing stations for all agency facilities.
- Vital records inventories.
- Copies of agency program records (whatever the media) needed to carry out continuing critical functions.
- System documentation for any electronic information systems designated as emergency operating records.

2. Records needed to protect legal and financial rights:

¹⁰⁷ See Section 9.5, Vital Records Plan for more details about inventorying vital records.

¹⁰⁸ This list is based on the Environmental Protection Agency's Developing And Maintaining A Vital Records Program, [Chapter 2 Vital Records Identification](#).

- Accounts receivable records.
- Social security records.
- Payroll records.
- Retirement records.
- Insurance records.
- Any records relating to contracts, entitlement, leases, or obligations whose loss would pose a significant risk to the legal and financial rights of the Federal Government or persons directly affected by its actions.
- System documentation for any electronic information systems designated as records needed to protect rights.

9.3.1 Do Vital Records Need to Be in a Particular Format?

Vital records can be original records or copies of records. They may be maintained on a variety of media including paper, flash drives, CD-ROMs, DVDs, magnetic tape, optical disk, photographic film, and microform. In selecting the media, you must ensure that equipment needed to read the specific media would be available when needed.

OPM frequently relies on electronic information systems to conduct business and to document essential transactions. Because information in electronic form may be changed or deleted more easily than information on other media, special measures are required for the creation and preservation of electronic records (see Subsection 7.3 Electronic Recordkeeping Systems).

9.4 Contingency Planning and Risk Assessment

Agency staff participating in contingency planning for vital records must include people from such functional areas as emergency coordination or preparedness as authorized by EO 12656. Within OPM, participating personnel must come from IT Security, Information Management, Records Management, Facilities Management, Security Services, Personnel Security, and Emergency Management. Officials from all these areas have essential roles in the continuity of operations should disaster strike. Therefore, their participation in the planning process and their contribution to the development of continuity of agency operations and records disaster recovery programs is crucial. Management personnel from the above-named offices must take the following steps:

- Determine the most critical activities that your office must perform to operate under other than normal business conditions and in a facility other than its normal place of business.
- Identify which records support those critical activities and the resumption of normal operations.

- Identify which records series or electronic information systems contain information needed to protect the legal and financial rights of the agency and persons directly affected by the office's actions and decisions.
- Determine which records within your physical or legal custody are vital.
- Establish a vital records plan and a plan to recover records (regardless of the medium) that are damaged in an emergency or disaster.

Program managers, in consultation with the Records Management organizational unit in the Office of the Chief Information Officer (OCIO), must then take steps to ensure that copies of vital records are properly managed throughout their life cycle.

9.5 Vital Records Plan

Like the agency's master file plan, OPM's Vital Records Plan must be the result of a compilation of the vital records inventories from individual OPM offices. Records Coordinators, together with program managers, must conduct inventories of their vital records by taking the following steps:¹⁰⁹

- Consult with the official responsible for emergency coordination.
- Review agency statutory and regulatory responsibilities and existing emergency plans for insights into the functions and records that may be included in the vital records inventory.
- Review documentation created for the contingency planning and risk assessment phase of emergency preparedness. OPM program areas and offices engaged in contingency planning and risk assessment are obvious candidates for the performance of a vital records inventory.
- Review current file plans of offices that are responsible for performing critical functions or may be responsible for preserving rights.
- Review the agency records schedule to determine which records series potentially qualify as vital.

Your inventory of vital records must include:

- The name of the office responsible for the records series or electronic information system containing vital information.
- The title of each records series or information system containing vital information.
- Identification of each series or system that contains vital records.
- The medium on which the records are recorded.
- The physical location for offsite storage of copies of the records series or system.
- The volume of each vital record series.
- The frequency with which the records are to be updated.

¹⁰⁹ Also, see Section 9.3, How Do I Identify Vital Records?.

The Vital Records Plan must include:

- Measures to ensure the survival of the records or copies of them in case of an emergency. See 36 CFR 1236.26, Protection of vital records, for more information.
- Measures for periodically updating copies of vital records to ensure that the information is kept current.
- Procedures for retrieving vital records, bearing in mind that individuals unfamiliar with the records may need to use them in an emergency.
- For electronic records systems, the means for ensuring that appropriate hardware, software, and system documentation adequate to operate the system and access the records will be available.

9.5.1 Updating the Vital Records Plan

The Vital Records Plan is itself a vital record and must be maintained as such. To ensure the wide distribution of the Vital Records Plan, copies must be maintained by the Records Officer and each Records Coordinator. Most importantly, a copy of the Vital Records Plan must be kept at the COOP site.

The Vital Records Plan must be updated annually. It would be most convenient to conduct this update in tandem with the annual agency-wide record series inventory. The Records Officer must ensure that copies of the updated Vital Records Plan are distributed to each Records Coordinator and sent to the COOP site.

9.6 When Can Vital Records Be Destroyed?

To destroy or archive vital records that are original records, see the relevant records schedule. You must not destroy original records that are not scheduled by a NARA-approved schedule.

You may destroy duplicate copies of records created and maintained for vital records purposes only when they become superseded or obsolete during the routine Vital Records Plan update process.

10. TEMPORARY AND PERMANENT SHUTDOWNS OF OPM OFFICES

There will be occasions when OPM may find it necessary to effect a temporary shutdown of the agency (i.e., lack of appropriated funds) or to permanently shutdown components (i.e., closing an area office). During these situations, there are certain functions that must be carried out with respect to the official records of the agency. This section provides the necessary instructions for the OPM Records Officer and the designated Records Coordinators when these occasions happen.

10.1 Temporary Shutdowns

1. Records Officer

The OPM Records Officer will provide advice and assistance to the Records Coordinators, upon request, and will take appropriate measures to safeguard all OPM records during any temporary shutdowns. The RO will perform high priority records searching in the Headquarters office (i.e., requests from the White House, the Congress, and the Courts).

2. Records Coordinators

Before a temporary shutdown occurs, the designated RCs ensure that the records for which they are responsible remain in a working status, after taking precautions to safeguard the records similar to those taken at the close of each workday.

10.2 Permanent Shutdowns

1. Records Officer

OPM's Records Officer will provide advice and assistance to the designated Records Coordinators after being notified of the planned closing of any OPM organization or site. The RO will also coordinate necessary arrangements with NARA.

2. Records Coordinators

Before permanent shutdowns actually occur, the Records Coordinators must:

- a. Notify the OPM Records Officer by telephone or in writing.
- b. Identify and separate any personal papers of OPM officials from official agency records. Ensure that only personal papers are removed from Federal custody. If an official keeps papers of a private or nonofficial character which pertain only to personal affairs, they must be clearly designated as unofficial and, must at all times be filed separately from the official records of the office. In cases where matters requiring the transaction of official business are received in private personal correspondence, the portion of the correspondence that pertains to

official business must be extracted and made a part of the official files (see also Subsection 4.1.2 Personal Papers).

- c. Destroy nonrecord materials. Nonrecord materials consist of extra copies of Federal records and other printed, duplicated, or processed material made or acquired and preserved solely for reference or exhibition purposes (see also Subsection 4.1.1 Nonrecords). Some examples of nonrecord materials are:
 - (1) Reference sets of Operations Letters, Employee Letters, Federal Personnel Manuals, registers, vendor catalogues and price lists, blank forms, Comptroller General Decisions, etc.
 - (2) Preliminary drafts of all types and final drafts that neither reflect significant changes nor bear any signatures of reviewing or concurring officials.
- d. Apply approved OPM disposition schedules and the General Records Schedules, to effect disposition of immediately disposable records.
- e. After completing steps b, c, and d above, box the remaining records for transfer. It is important to use the correct size boxes (see Subsection 6.12.4). Transfer the boxed material in the following way:
 - (1) If another office is assuming the functions that the records cover and the assuming office will need the records for active operational purposes then transfer the records to that office.
 - (2) If another office is assuming the functions that the records cover and the assuming office will not need the records for operational purposes, transfer these inactive records to the FRC used by the assuming office.
 - (3) Transfer records not covered by scenarios (1) and (2) above to the FRC normally used by the office which is closing.
- f. Advise the office assuming the functions of the closing office of all records that are in FRCs by sending them the closing office's SF 135s (Records Transmittal and Receipt). These forms describe the records and tell where they are located.
- g. Advise the FRC used by the organization, which is closing of the name, address, and telephone number of the office assuming the functions of the closing office. In addition, advise the FRC of the records they have that now belong to the assuming office by providing the transfer numbers of the applicable SF 135s.
- h. If for any reason, another office is not assuming responsibility for documents stored in a FRC, send the appropriate SF 135s to the OPM Records Officer. Then advise the FRC of the name, address, and telephone number of the Records Officer and the transfer numbers of the transferred SF 135s.

11. SPECIAL CATEGORIES OF RECORDS

- **Presidential Records**
- **Legislative Files**
- **Historic Records**
- **Litigation Hold Documents**

12. RECORDS MANAGEMENT TRAINING

As previously stated, all OPM employees, political appointees, interns, and contractors have records management responsibilities. All will receive training in records management techniques (see 36 CFR 1222.20(b)(5)).

12.1 Annual Training and Evaluations for Records Coordinators

OPM's Records Coordinators have greater records management responsibilities than most OPM employees and they must have a higher level of training. These annual trainings will provide the Records Coordinators with a thorough knowledge of the records, regardless of medium, within their offices or program areas. The RCs are expected to know what OPM schedules and disposition items are in common use in their offices, and whether the records governed by the schedules are being managed properly by:

- Conducting annual inventories,
- Regularly updating the office file plan,
- Retiring records to Federal Records Centers in a timely manner,
- Ensuring the timely destruction, with the Records Officer's approval, of temporary records that have reached the end of their retention period, and
- Providing for the timely transfer of ownership, with the Records Officer's approval, of permanent records that have reached the end of their retention period.

As time and funding allow, Records Coordinators are strongly encouraged to take NARA's Records Management Certification Training classes.¹¹⁰ Because these classes are continually being revised to treat new technologies and techniques, it is recommended that those who have already completed their certification periodically take refresher classes. This is particularly desirable for courses dealing with electronic records management (ERM).

¹¹⁰ See NARA's [Federal Records Management Certification](#) Web site.

12.2 Periodic Training for New Staff

The OPM Records Management Office in conjunction with the OPM Human Resources Office within Employee Services¹¹¹ will provide a brief records management overview for all new OPM employees, interns, and contractors as part of the new employee orientation sessions.

All new employees, interns, and contractors must have completed this training in their records management responsibilities within 30 days of their first full day of work at OPM. This training will provide:

- A brief review of the legal authorities upon which Federal records management is based, and the possible sanctions for failure to comply with those authorities,
- A working definition of:
 - Federal Record,
 - Nonrecord, and
 - Personal Papers,
- A review of the records management implications of email usage,
- A summary of the records management responsibilities of OPM pursuant to Federal statutes and regulations, and
- A review of the benefits to OPM as well as each employee that a functioning records management program provides.

12.3 Periodic Training and Briefings for Senior Officials and Political Appointees

Senior officials and political appointees at OPM have the same records responsibilities as other employees. However, because of their high-level positions within OPM, the records they create, receive, or that document their actions and decisions on behalf of OPM are more likely to have archival value than the records of ordinary employees or contractors (see Subsection 2.6).

Within their first 30 days at OPM, Senior officials and political appointees will be trained in OPM's records management responsibilities. This training will cover the same material as the training for new employees (see Subsection 12.2 above). In addition, they will be trained in the records management responsibilities associated with their positions within OPM. This extra training will emphasize their responsibilities for the proper management and segregation of the following types of records:

¹¹¹ See Employee Services, Associate Director and Chief Human Capital Officer in THEO's [Key Offices' Telephone And Facsimile \(FAX\) Numbers](#). See also THEO's [Team OPM – Employee Services](#) Web site under OPM Human Resources.

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- Papers created before entering Government service,
- Private papers brought into, created, or received at OPM,
- Work-related personal papers and other nonrecords,
- Federal records created or received by the senior official, or that document the official's actions and decisions on behalf of OPM, and
- Federal records received by or given to the President, Vice President, or the Executive Office of the President which may fall under the requirements of the Presidential Records Act of 1978 (44 U.S.C. 2201 *et seq.*).

APPENDIX A: ACRONYMS

Acronym	Expansion
AIIM	Association for Information and Image Management
ANSI	American National Standards Institute
ARCIS	Archives and Records Center Information System
ASCII	American Standard Code for Information Interchange
CD-ROM	compact disk-read only memory
CFR	Code of Federal Regulations
CIO	Chief Information Officer
CIPS	Centers Information Processing System
COOP	Continuity of Operations Plan, Program
CPI/BPI	characters per inch/bytes per inch
DFR	Disposition of Federal Records
DLT	digital linear tape
DSN	data set name
DVD	digital video disk
EBCDIC	Extended Binary Coded Decimal Interchange Code
EIS	electronic information system
EO	Executive Order
EPA	Environmental Protection Agency
ERM	electronic records management
ESI	electronically stored information
FIPS PUB	Federal Information Processing Standards Publication
FTP	File Transfer Protocol
FOIA	Freedom of Information Act
FRCP	Federal Records Center Program (NARA)
FPM	Federal Personnel Manual
FRC	Federal Records Center
GAO	Government Accountability Office
GRS	General Records Schedules
GSA	General Services Administration
IM	instant messages, messaging
IRM	information resource management
ISO	International Standards Organization
IT	information technology
LAN	local area network
NA	National Archives
NARA	National Archives and Records Administration
OCIO	Office of the Chief Information Officer
OCR	optical character recognition
OF	Optional Form
OGC	Office of General Counsel
OMB	Office of Management and Budget

Records Management for OPM Internal Administrative

OPM	Office of Personnel Management
PDF	Portable Document Format
PII	personally identifiable information
RC	Records Coordinator
RM	records management
RO	Records Officer
SF	Standard Form
T&D	Transfer & Disposition (NARA)
TIFF	Tagged Image File Format
U.S.C.	United States Code
XML	Extensible Markup Language

APPENDIX B: GLOSSARY

For a complete Glossary of records management terms, please see *Disposition of Federal Records: a Records Management Handbook*, APPENDIX D GLOSSARY (NARA 1992 and 1997).¹¹² NARA also has brief, online lists of General Records Management Definitions at its National Archives at Philadelphia Web site and at the end of its publication DOCUMENTING YOUR PUBLIC SERVICE. Other records management terminologies can be found in the Code of Federal Regulations at 36 CFR 1220.14 General definitions and at 36 CFR 1234.2 Definitions (for electronic records). For an on-line glossary based on NARA's *A Federal Records Management Glossary* (1993 and also not online), see the Environmental Protection Agency's **RECORDS** Web site under Glossary, Abbreviations and Acronyms.

Active records – records necessary to conduct the current business of an office and therefore generally maintained in office space and equipment. Listed in DFR Glossary under CURRENT RECORDS.

Case Working Files - background or support files, such as worksheets, questionnaires, rough notes, calculations, or drafts, used to prepare or analyze case file documents. See also WORKING PAPERS.

Convenience Files – Nonrecord copies of correspondence, completed forms, reports, and other documents kept solely for ease of access and reference. See also TECHNICAL REFERENCE FILES, WORKING PAPERS.

COOP – Continuity of Operations Plan, or Program. Preparations and institutions maintained by business or governmental entities providing survival of organizational functions and operations in the case of local, regional, or national emergencies or disasters.

Disposal – The actions taken regarding temporary records when their retention periods expire, and consisting of destruction and occasionally donation; the destruction or donation of nonrecords when they are no longer needed.

Disposition –

Cite Page 10 of the Disposition Federal Records document created by NARA:

As used in this handbook, **disposition** means those actions taken regarding Federal records after they are **no longer needed in office space to conduct current agency business**. **These actions include:**

- Transfer of records to agency storage facilities or NARA records centers.
- Transfer of records from one Federal agency to another.

¹¹² The online version of DFR does not include the Glossary in Appendix D. To resolve this problem, a PDF copy of the old Appendix D Glossary from the 1992 edition of DFR was produced.

- Transfer of permanent records to the National Archives of the United States.
- Disposal of temporary records no longer needed to conduct agency business, usually by destruction or occasionally by donation.

Disposition is a comprehensive term that **includes destruction as well as other actions**, such as the transfer of permanent records to the National Archives.

In contrast to disposition, "disposal" in Federal usage refers to only those final actions taken regarding temporary records after their retention periods expire. It normally means destruction of the record content, such as by recycling or burning the record medium. The term is also used occasionally to mean the transfer of temporary records from Federal control by donating them to an eligible person or organization after receiving NARA's approval.

Disposition authority – a records schedule and disposition item stating the record is either temporary or permanent and indicating the length of the record's retention period.

Disposition item – within a records schedule, a record series or subseries indicating the permanent or temporary disposition of the record and its retention period.

Drafts – correspondence, reports, or directives not yet concurred with or finalized.

File plan

- **Office file plan** – a listing of every folder within every record series in an office.
- **Master File Plan** – a compilation of all office file plans in an agency.

Game Developedia - a blog containing posts and articles covering all branches of knowledge or, less commonly, all aspects of game development.

Inactive records – records that are referenced less than once a month. Also called *noncurrent* records.

Mashup – a Web site or application that is made up of a combination of data from two or more other, unrelated Web sites.

Nonrecords – those Federally owned documentary materials that do not meet the criteria of Federal records found at 44 U.S.C. 3301. Such documents include extra or convenience copies of Federal records, Government publications originating in other agencies, non-Government periodicals and other materials, and stocks of forms. Also, see CASE WORKING FILES, DRAFTS, PERSONAL PAPERS, AND WORKING PAPERS.

Permanent records – records of archival value, the legal ownership of which is transferred to the National Archives upon reaching the end of their retention period.

Personal papers – records belonging to an individual and not created or received in the course of Federal business.

PII – personally identifiable information - Records containing such information are subject to restrictions under the Privacy Act of 1974 (5 U.S.C. 552a).

Record – any recorded information (1) created during the course of agency business, (2) received during the course of agency business and requiring an action or decision, or (3) documenting actions taken and decisions made during the course of agency business (see 44 U.S.C. 3301 for the statutory definition).

Records schedule – a formal description of a group of related records providing mandatory instructions about how long the records must be kept, and whether they should be destroyed or archived at the end of that period.

Record series – a group of related records that have the same disposition and retention period; a schedule may contain many series. See DISPOSITION ITEM.

Retention period – length of time before temporary records can be destroyed or the legal ownership of permanent records can be transferred to NARA.

Series inventory (often referred to as a records inventory) – a descriptive list of each record series identified by a Records Coordinator or others responsible for maintaining records in an office.

Spoliation – in law, spoliation of evidence is the intentional or negligent withholding, hiding, alteration, or destruction of evidence, including records, which is known to be relevant to an impending or ongoing legal proceeding.

Technical Reference Files – Nonrecord copies of articles, periodicals, reports, studies, vendor catalogs, and similar materials that are needed for reference and information but are not properly part of the office’s records. See also CONVENIENCE FILES, NONRECORDS, and WORKING PAPERS.

Temporary records – records that are destroyed at the end of their retention period.

Transitory records – records with very brief retention periods of 180 days or less; records of little or no documentary or evidential value to be retained for brief periods, or as needed. See GRS 23, Item 7 for a detailed description and list of typical transitory records.

Unscheduled records – records that have not been appraised by NARA and are not covered by NARA’s General Records Schedules or OPM’s schedules. Because of the uncertainty of their value, unscheduled records cannot be destroyed.

Vital records – any records without which the agency could not function during or in the aftermath of an emergency; also records demonstrating agency legal rights and authority.

Working Papers - documents such as rough notes, calculations, or drafts assembled or created and used to prepare or analyze other documents. Also called *working files*. See also CASE WORKING FILES, CONVENIENCE FILES, NONRECORDS, RECORD, and TECHNICAL REFERENCE FILES.

APPENDIX C: REFERENCES

C.1 Authorities

Authorities for This Directive:

- 36 CFR 1222.20, Agency responsibilities
- 5 U.S.C. Chapter 11 – Office of Personnel Management
- 44 U.S.C. 2104, Administrative provisions
- 44 U.S.C. 3101, Records management by agency heads; general duties
- 44 U.S.C. Chapter 35 – Coordination of Federal Information Policy

Code of Federal Regulations (CFR)

- 5 CFR 297.104, Types of Records
- 36 CFR Chapter XII – National Archives and Records Administration
- 36 CFR Subchapter B – Records Management
 - 36 CFR Part 1220 – Federal Records; General
 - § 36 CFR 1220.14, Records Management – General definitions
 - § 36 CFR 1220.38, Disposition of records
 - 36 CFR Part 1222 – Creation and Maintenance of Federal Records
 - § 36 CFR 1222.20, Agency responsibilities
 - § 36 CFR 1222.34, Identifying Federal records
 - § 36 CFR 1222.36, Identifying personal papers
 - 36 CFR Part 1228 – Disposal of Federal Records
 - § 36 CFR 1228 Subpart B – Scheduling Records
 - § 36 CFR 1228.22, Developing records schedules
 - § 36 CFR 1228.24, Formulation of agency records schedules
 - § 36 CFR 1228.30, Scheduling temporary records
 - § 36 CFR 1228.31, Applying previously approved schedules to electronic records
 - § 36 CFR 1228.32, Request to change disposition authority

- § 36 CFR 1228.42, General Records Schedules - Applicability
- § 36 CFR 1228.50, Application of schedules
- § 36 CFR 1228.54, Temporary extension of retention periods
- § 36 CFR 1228.58, Destruction of temporary records
- § 36 CFR 1228.60, Donation of temporary records
- 36 CFR 1228 Subpart E – Loan of Permanent and Unscheduled Records
 - § 36 CFR 1228.70, Loan of Permanent and Unscheduled Records - Authority
 - § 36 CFR 1228.72, Loan of Permanent and Unscheduled Records - Approval
 - § 36 CFR 1228.74, Loan of Permanent and Unscheduled Records – Agency action
 - § 36 CFR 1228.76, Loan of Permanent and Unscheduled Records – NARA action on request
- 36 CFR 1228 Subpart G – Damage to, Alienation, and Unauthorized Destruction of Records
 - § 36 CFR 1228.100, Responsibilities
 - § 36 CFR 1228.102, Criminal penalties
 - § 36 CFR 1228.104, Reporting
- 36 CFR Subpart H – Transfer of Records from the Custody of One Executive Agency to Another (1228.120 – 1228.136)
- 36 CFR 1228 Subpart I – Transfer of Records to Records Storage Facilities
 - § 36 CFR 1228.150, Where can a Federal agency transfer records for storage?
 - § 36 CFR 1228.154, What requirements must an agency meet when it transfers records to a records storage facility?
- 36 CFR Subpart J – Transfer, Use, and Disposition of Records in a NARA Records Center

- § 36 CFR 1228.160, How does an agency transfer records to a NARA records center?
- 36 CFR Subpart K - Facility Standards for Records Storage Facilities
 - § 36 CFR 1228.240, How does an agency request authority to establish or relocate records storage facilities?
- 36 CFR Subpart L – Transfer of Records to the National Archives of the United States
 - § 36 CFR 1228.266, Audiovisual records
 - § 36 CFR 1228.268, Cartographic and architectural records
 - § 36 CFR 1228.270, Electronic records
 - § 36 CFR 1228.272, Transfer of records to the National Archives of the Unites States
- 36 CFR Part 1234 – Electronic Records Management
 - § 36 CFR 1234.2, Definitions
 - § 36 CFR 1234.10, Agency responsibilities
 - § 36 CFR 1234.22, Creation and use of text documents
 - § 36 CFR 1234.24, Standards for managing electronic mail
 - § 36 CFR 1234.30, Selection and maintenance of electronic records storage media
 - § 36 CFR 1234.32, Retention and disposition of electronic records
 - § 36 CFR 1234.34, Destruction of electronic records
- 36 CFR Part 1236 – Management of Vital Records
 - § 36 CFR 1236.14, Definitions
 - § 36 CFR 1236.20, Vital records program objectives
 - § 36 CFR 1236.22, Identification of vital records
 - § 36 CFR 1236.26, Protection of vital records
- 41 CFR Part 102-38, Sale of Personal Property
- 41 CFR Part 102-193, General Services Administration (GSA) - Creation, Maintenance, and Use of Records

United States Code (U.S.C.)

- 5 U.S.C. 552, Public information; agency rules, opinions, orders, records, proceedings (Freedom of Information Act, or FOIA)
- 5 U.S.C. 552a, Records maintained on individuals (Privacy Act of 1974)
- 18 U.S.C. 793, Gathering, transmitting or losing defense information
- 18 U.S.C. 794, Gathering or delivering defense information to aid foreign government
- 18 U.S.C. 798, Disclosure of classified information
- 18 U.S.C. 2071, Concealment, removal, or mutilation [of records], generally
- 28 U.S.C. Judiciary and Judicial Procedure – Appendix (Federal Rules of Civil Procedure)
- 44 U.S.C. Chapter 21, National Archives and Records Administration
 - 44 U.S.C. 2115, Reports; correction of violations
- 44 U.S.C. Chapter 22, Presidential Records (Presidential Records Act of 1978)
- 44 U.S.C. Chapter 25, National Historical Publications and Records Commission
- 44 U.S.C. Chapter 29, Records Management by the Archivist of the United States and by the Administrator of General Services
 - 44 U.S.C. 2909, Retention of records
- 44 U.S.C. Chapter 31, Records Management by Federal Agencies
 - 44 U.S.C. 3101, Records management by agency heads
 - 44 U.S.C. 3102, Establishment of program of management
 - 44 U.S.C. 3106, Unlawful removal, destruction of records
- 44 U.S.C. Chapter 33, Disposal of Records
 - 44 U.S.C. 3301, Definition of records
 - 44 U.S.C. 3303, Lists and schedules of records to be submitted to the Archivist by head of each Government agency
 - 44 U.S.C. 3309, Preservation of claims of Government until settled in Government Accountability Office; disposal authorized upon written approval of Comptroller General

- [44 U.S.C. 3314, Procedures for disposal of records exclusive](#)
- [44 U.S.C. Chapter 35, Coordination of Federal Information Policy](#)
 - [44 U.S.C. 3501.207, Accessibility, usability, and preservation of government information \(E-Government Act of 2002\)](#)
 - [44 U.S.C. 3506, Federal agency responsibilities](#)
- [44 U.S.C. Chapter 36, Management and Promotion of Electronic Government Services](#)

Executive Orders (EO)

- [EO 12656: Assignment of Emergency Preparedness Responsibilities](#)

C.2 External and Internal Issuances Incorporated by Reference

C.2.1 External References

- Department of Defense (DoD): [Electronic Records Management Software Applications Design Criteria Standard \(DoD 5015.02-STD \[04/2007\]\)](#)
- Environmental Protection Agency (EPA)
- [Developing and Maintaining a Vital Records Program](#)
- [Frequent Questions About Email Records](#)
- [Records Web site](#)
- [Records Management Policy \(EPA Classification No: CIO 2155.1 \[06/08/2009\]\)](#)
- [Vital Records Procedures \(EPA Classification No: CIO 2155.P-01.0 \[06/08/2009\]\)](#)
- [What Every EPA Staffer Should Know About Records Management](#)
- General Services Administration (GSA)
- [GSA Forms Library](#)
- [GSA Advantage \(Customer Assistance\)](#)

- National Archives and Records Administration (NARA) Bulletins:
 - [NARA Bulletin 2005-05: Guidance for flexible scheduling](#)
 - [NARA Bulletin 2005-06: Additional requirement for transferring permanent records to NARA directly from agencies \(Mandatory: 36 CFR 1228.54; 36 CFR 1228.270; 36 CFR 1234.32\)](#)

- [NARA Bulletin 2006-02: NARA Guidance for Implementing Section 207\(e\) of the E-Government Act of 2002 \(Mandatory: 44 U.S.C. Chapters 31 and 35; 36 CFR Ch. XII, Subchapter B; OMB Circular A-135\)](#)
- [NARA Bulletin 2008-03: Scheduling existing electronic records \(Mandatory: 44 U.S.C. 3501 \(E-Government Act of 2002\)\)](#)
- [NARA Bulletin 2008-04: Guidance for flexible scheduling](#)
- [NARA Bulletin 2010-02: Continuing Agency Responsibilities for Scheduling Electronic Records \(Mandatory: 44 U.S.C. Chapters 31 and 35; 44 U.S.C. 3501 \(E-Government Act of 2002\); 36 CFR Ch. XII, Subchapter B – Records Management; OMB Circular A-130\)](#)
- [NARA Bulletin 2010-03: Flexible scheduling](#)
- [NARA Bulletin 2010-04: Guidance Concerning Notifications for Previously Scheduled Permanent Records](#)
- [NARA FAQs](#)
- [Frequently asked questions about Instant Messaging](#)
- [Frequently Asked Questions \(FAQ\) About Digital Audio and Video Records](#)
- [Frequently Asked Questions \(FAQ\) about Transferring Permanent Records in PDF/A-1 to NARA](#)
- [Frequently Asked Questions \(FAQs\) About Media Neutral Schedule Items](#)
- [NARA Publications and Guidance's](#)
- [Baron, Jason R. and Daniel MacDonald. *E-Discovery & the New Federal Rules of Civil Procedure: What Agencies Need to Know*, The Rocky Mountain Record Special Edition \(XIV, 2\)](#)
- [Contact Information for Federal Agency Appraisal and Scheduling Work Groups](#)
 - [Disposition of Federal Records: a Records Management Handbook](#)
- [Documenting Your Public Service](#)
- [Electronic Records Management Initiative](#)
- [Expanding Acceptable Transfer Requirements: Transfer Instructions for Existing Email Messages with Attachments \(Mandatory: 36 CFR 1228 Disposition of Federal Records\)](#)
- [Expanding Acceptable Transfer Requirements: Transfer Instructions for Existing Permanent Electronic Records Scanned Images of Textual Records \(Mandatory: 36 CFR 1234 Electronic Records Management\)](#)
- [Federal Records Centers](#)
- [Federal Records Centers Electronic Forms and Resources](#)
- [Federal Web Content Manager's Toolkit](#)
- [The FRC Toolkit – Your Guide to the Federal Records Center Services](#)

- [General Records Management Definitions](#)
- [General Records Schedules](#)
- [Guidance on Managing Web Records](#) (Mandatory: [44 U.S.C. Chapter 33](#); [44 U.S.C. 3501](#) (E-Government Act of 2002); for other authorities, see NARA's [Federal Web Content Manager's Toolkit](#))
- [Implications of Recent Web Technologies for NARA Web Guidance](#) (Mandatory: [44 U.S.C. Chapters 31 and 35](#); [OMB Circular A-130](#); [OMB Circular A-135](#))
- [Managing Audiovisual Records: An Instructional Guide](#) (Mandatory: [36 CFR 1228.72](#); [36 CFR 1228.100 et seq.](#); [36 CFR 1228.266](#); [36 CFR Part 1232](#) [Audiovisual Records Management](#); [41 CFR 101-45.10](#); [GRS 21](#))
- [NARA Basic Laws and Authorities](#)
- [NARA Electronic Records Management \(ERM\) Guidance on the Web](#)
- [Tips for Scheduling Electronic Databases](#)
- [Transfer of Electronic Records](#) (Mandatory: [36 CFR Part 1228 Disposition of Federal Records](#))
- [Transferring Permanent Electronic Records to NARA: Answers to the Top 5 Questions](#) (05/2006)
- [National Digital Information Infrastructure & Preservation Program](#)
 - [Sustainability of Digital Formats Planning for Library of Congress Collections: PDF/A-1, PDF for Long-term Preservation, User of PDF 1.4](#)
- [Office of Management and Budget \(OMB\)](#)
 - [OMB Circular A-130 Memorandum for Heads of Executive Departments and Agencies](#)
 - [OMB Circular A-135 Management of Federal Advisory Committees](#)

C.2.2 Internal OPM References

- [OPM Administrative Manual Supplement \(AMS\) 44-2, Maintenance of Records \(1993\)](#)
- [OPM AMS 44-3, Disposition of Records \(2003\)](#) (includes all OPM Records Schedules except OCR and OIG)
- [OPM Guide to Personnel Recordkeeping](#)
- [OPM Publications Database](#)
- [OPM Records Schedules](#)

C.2.3 Forms

- [Optional Form \(OF\) 11 Reference Request – Federal Records Centers](#)
- [National Archives Form \(NA\) 13000 agency Review for Contingent Disposal](#)

Records Management for OPM Internal Administrative

- NA 13001 Notice of Eligibility for Disposal¹¹³
- NA 13171 Notification for Previously Scheduled Permanent Records
- NA 13171a Agency Certification of Compliance With NARA Transfer Requirements: Scanned Images of Textual Records
- NA 13171b Agency Certification of Compliance With NARA Transfer Requirements: Portable Document Format (PDF)
- NA 13171c Agency Certification of Compliance With NARA Transfer Requirements: Digital Photographic Records
- NA 13171d Agency Certification of Compliance With NARA Transfer Requirements: E-Mail Messages with Attachments
- NA 14097 Technical Description for Transfer of Electronic Records to the National Archives
- NA 14028 Information System Description Form
- SF 115 Request for Records Disposition Authority
- SF 135 Records Transmittal and Receipt
- SF 258 Agreement to Transfer Records to the National Archives of the United States

¹¹³ Also called Notification of Disposal Report

APPENDIX D: INDEX

[RESERVED]

APPENDIX E: PROCEDURES

E.1 Printing File Folder Labels¹¹⁴

1. Open up a new MS Word document.
2. Click on **TOOLS**.
3. Scroll down and click on **LETTERS & MAILINGS**.
4. Then, click on **ENVELOPES & LABELS**.
 - a. Note - When the window opens, make sure you are looking at the **LABELS** tab.
5. Look to the lower right corner of the window and you will see **LABELS**. (There will be a description of the label type, Avery product number, and illustration of the label.)
6. Click on the description of the label and the **LABEL OPTIONS** window will appear.
7. You will see a menu of the Avery product numbers.
8. Click on **5161-Address** (This is the approved label size to accommodate four lines of file information).
9. Then, click **OK**.
10. That will return you to the **ENVELOPES & LABELS** window.
11. At this point, **Avery Standard, 5161, Address** must be in the lower right corner of the window.
12. Then, click on **NEW DOCUMENT**.
13. Your full page of blank Avery 5161 labels will appear.
14. Enter the required label information on the blank labels.
15. Your labels are now ready to print.

¹¹⁴ These instructions are appropriate for Word 2002 and 2003.



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