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RECORDS DISPOSITION PLAN

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REVISION SUMMARY

Rev. No.	Description of Change	Pages	Date
0	Initial Release – Paducah Infrastructure Support Services Contract Number DE-EM0003733.	All	01/29/16
1	Reconciled U.S. Department of Energy comments.	All	04/01/16
2	Performed Periodic review and updated to reflect current practices. Formatted into new template, previous no. SSI.DC-1003.	All	04/01/19

EXECUTIVE SUMMARY

Swift & Staley Inc. (hereinafter referred to as Swift & Staley Team [SST]) serves as the site-wide Records Custodian and manages all records, regardless of media, generated and/or received in the performance of DE-EM0003733, *Paducah Infrastructure Support Services Contract*, including records transferred from predecessor contractors and the Deactivation and Remediation (D&R) contractor. SST also manages the Records Management Center (RMC). The records addressed in this plan are, government-owned records, as defined in Section I.140 of DE-EM0003733, *Paducah Infrastructure Support Services Contract*, that SST will generate and/or receive during the term of the contract, or legacy records whose custodianship was assumed by SST at the inception of SST's contract with U.S. Department of Energy (DOE).

In accordance with SST's contract, all records are to be maintained electronically. In the event that it does not make sense to maintain electronically (e.g., litigation hold, short retention), hardcopy records are processed and sent to a Federal Records Center (FRC) for storage.

SST maintains, preserves, and dispositions records according to 44 United States Code (USC) 29, *Records Management by the Archivist of the United States and by the Administrator of General Services*; 44 USC 31, *Records Management by Federal Agencies*; 44 USC 33, *Disposal of Records*; 36 *Code of Federal Regulations* Chapter 12, Subpart B, *Records Management*; DOE Order 243.1B, *Records Management Program*; the National Archives and Records Administration (NARA) and DOE Records Disposition Schedules; and PGDP-RM-PR-001, *Records Management*. This plan describes steps taken to identify eligible records and the process for disposition.

SST is committed to maintaining an efficient and economical Records Management Program. The Records Management Program is placed organizationally in the Records and Deliverables function of the SST organization, and the Records Manager reports to the Records and Deliverables Manager.

ACRONYM LIST

ANSI	American National Standard Institute
ASQ	American Society for Quality
D&R	Deactivation and Remediation
DOE	U.S. Department of Energy
ERMS	Electronic Records Management System
FRC	Federal Records Center
NARA	National Archives and Records Administration
QA	Quality Assurance
RMC	Records Management Center
SST	Swift & Staley Team
USC	United States Code

1.0 INTRODUCTION

The life cycle of a record consists of three stages: creation and receipt, maintenance and use, and disposition. Records disposition is an integral part of the Records Management Program for Swift & Staley Inc. (hereinafter referred to as Swift & Staley Team [SST]) and is the third and final stage in the life cycle of records. Depending on the stage in its life cycle, a record is referred to as “current,” “semi-current,” or “noncurrent.” These terms do not refer to the date or age of the records, but rather to their use in the current daily work of the office.

The disposition stage for all site records is conducted by the SST Records Management Center (RMC) staff. According to PGDP-RM-PR-001, *Records Management*, the SST Records Manager is responsible for ensuring records are stored, maintained, and dispositioned according to Federal and U.S. Department of Energy (DOE) requirements. The RMC staff is responsible for retaining and dispositioning records according to approved National Archives and Records Administration (NARA) and DOE records disposition schedules. Approved retention periods may be extended for records placed under legal holds for purposes of audits, litigation, and Freedom of Information Act obligations or other similar obligations.

The SST Records Disposition Program has three main objectives:

1. Prompt disposal of a temporary record whose retention period has been met.
2. Transfer to storage non-electronic records no longer needed for business use, but not yet eligible for final disposition or when not feasible to convert to a NARA acceptable electronic format for Electronic Records Management System (ERMS) storage (temporary) or transfer to NARA (permanent).
3. Identification, scheduling, and transfer of permanent records to NARA.

The implementation and compliance with this program applies to the SST RMC staff. As records are generated, received, and processed, each record is assigned a records schedule from the NARA and DOE Records Disposition Schedules which describes the record series and retention instruction. Records are cutoff and dispositioned according to the retention instruction. Records are submitted to the RMC in DOE and NARA-acceptable electronic formats and are maintained in an ERMS. Deviation from electronic records must be approved by the SST Records Manager.

The RMC staff performs a quality assurance (QA) check based on the American National Standard Institute/American Society for Quality (ANSI/ASQ) Z1.4-2003, *Sampling Procedures and Tables for Inspection by Attributes*, to ensure the electronic record meets the criteria established in PGDP-RM-PR-001, *Records Management*. The hardcopies of electronic records submitted by SST may be destroyed according to PGDP-RM-PR-001. This will ensure the RMC staff has processed the record into the ERMS and completed the monthly QA assessment.

In some cases users may need to retain a copy of a record for informational purposes. All hard copies maintained for informational purposes must be marked as “Nonrecord Copy”. Electronic copies maintained for informational purposes should be filed in an electronic folder labeled as “Nonrecord Copy” or saved with “Nonrecord Copy” as part of

the filename. Marking appropriately distinguishes informational copies from the record copy maintained by the RMC. SST's policy is that nonrecord copies will not be maintained past the destruction date.

2.0 DISPOSAL OF CLASSIFIED AND UNCLASSIFIED TEMPORARY RECORDS

Records disposal is the final action taken regarding temporary records once their retention period has been met. Disposal of hardcopy paper records stored at the Federal Records Center (FRC) and ERMS stored electronic records occurs only with DOE approval. Hardcopy, or other native formats will be destroyed in accordance with applicable laws and regulations. Classified records will be destroyed so that sensitive, proprietary, and/or national security information is not at risk for disclosure. SST will follow PGDP-RM-PR-001, *Records Management*, and will not destroy any records without receiving proper DOE approval.

3.0 TRANSFERRING HARDCOPY RECORDS TO THE FEDERAL RECORDS CENTER

Although the RMC accepts only electronic records, hardcopy (or other formats not approved by NARA) can exist. These records can be classified or unclassified. Hardcopy records, especially large volumes, may be transferred to the FRC. Possible cases are when the records are no longer needed for business use, but have not yet met the specified retention period or when converting records to an acceptable NARA approved electronic format for ERMS storage is not feasible. If an exception is made to accept these instead of electronic records, the records will be transferred to the FRC in accordance with PGDP-RM-PR-001, *Records Management*.

4.0 TRANSFERRING PERMANENT RECORDS TO THE NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

It is SST's policy to transfer permanent records to NARA as prescribed in the NARA and DOE Records Disposition Schedules. NARA will assume ownership of the records at the time of transfer. All permanent records will be transferred to NARA in an approved electronic format in accordance with PGDP-RM-PR-001, *Records Management*. In the event there are issues with converting electronically, SST RMC will work with the DOE Records Management Field Officer on an acceptable solution.

5.0 DEFINITION OF TERMS

Current records — Records used on a daily basis that are necessary to conduct the business or mission of the agency.

Cutoff dates — Records in a file series should be cut off or broken at regular intervals, usually at the end of the fiscal year, to permit their disposal or transfer in complete blocks.

Disposition — Refers to the actions taken when a record no longer is needed for current government business (e.g., any activity with respect to the approved disposal by destruction; the transfer of records to an approved FRC; the transfer of permanent records to NARA; or the transfer of records from one federal agency to another federal agency).

Federal Records Center — FRC is operated by NARA for the storage, processing, and servicing of government records, and meets the requirements of 36 Code of Federal Regulations Chapter 12, Subpart K, *Facility Standards for Records Storage Facilities*.

Legacy records — Government-owned records that preceded SST contract and are within the custodianship of the SST Records Management Program.

Noncurrent records — Records no longer required to conduct business and are ready for disposition, as identified in the NARA and DOE Records Schedules.

Permanent records — Records determined by NARA to have sufficient historical or other value to warrant continued preservation by the Federal government.

Record (44 U.S.C. Chapter 33 § 3301) — "Includes all recorded information, regardless of form of characteristics, made or received by a federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the U.S. Government or because of the informational value of data in them; and does not include library and museum material made or acquired and preserved solely for reference or exhibition purposes; or duplicate copies of records preserved only for convenience. The term *recorded information* includes all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form."

Record copy — The official copy of a record that is retained for legal, operational, or historical purposes.

Retention period — The period of time during which the record must be maintained due to the potential need for operational, legal, fiscal, historical, or other purposes.

Semi-current records — Records that are seldom required to conduct business and can be moved to an FRC.

Series — A block of records having the same disposition authority and same disposition date.