

# Management System Description: Records Management

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## 1.0 Purpose

The Environmental Management Consolidated Business Center (EMCBC) Records Management System sets forth requirements and responsibilities for creating/receiving and preserving records. The Records Management Program promotes the lifecycle management of records and information content (regardless of media) throughout each record’s lifecycle (creation/receipt, maintenance/use, and disposition). Records Management is critical to the successful mission of the EMCBC and provides evidence of the activities, organization, functions, policies, decisions, procedures, and operations. Sound records management principles protect the legal and financial rights of the government and individuals, preserve historical legacy information, and facilitate the effective retrieval of essential information. The Records Management System also confirms compliance with additional record-keeping requirements in all mission-related functions and provides continuity in the event of a disaster.

## 2.0 Responsibilities

The table below represents roles and responsibilities specific to this Management System. For a detailed description of CBC MS roles and responsibilities, please see the EMCBC Functions Responsibilities and Authorities Document.

<b>Roles</b>	<b>Responsibilities</b>
<b>EMCBC Director</b>	<ul style="list-style-type: none"> <li>• Appoint a Records Management Field Officer (RMFO) for the EMCBC.</li> <li>• Appoint a RMFO for the Environmental Management (EM) Small Sites.</li> </ul>
<b>Records Management Field Officer (EMCBC)</b>	<ul style="list-style-type: none"> <li>• Develop, implement, and coordinate records management program activities at the EMCBC, act as a liaison with the Program Records Officer (PRO) and provide oversight and guidance to the EMCBC.</li> </ul>
<b>EMCBC RMFO / EM Small Sites RMFO</b>	<ul style="list-style-type: none"> <li>• Develop, implement, and coordinate records management program activities for the EM Small Sites and EMCBC supported sites, act as a liaison with the PRO and provide oversight and guidance to the small sites and EMCBC support sites (Federal and Contractor).</li> </ul>

<b>Roles</b>	<b>Responsibilities</b>
<b>Assistant Directors / Federal Project Directors / Field Element Manager</b>	<ul style="list-style-type: none"> <li>• Appoint a Records Custodian/Records Coordinator to coordinate records management activities within their respective organization/site to ensure compliance with the Records Management Program.</li> </ul>
<b>Assistant Director, Office of Contracting</b>	<ul style="list-style-type: none"> <li>• Work with RMFO to ensure that all applicable Federal records management requirements, including Contractor Requirement Documents (CRD) embedded in DOE Orders, records management scope and Government/Contractor ownership clauses, are incorporated into all applicable contracts.</li> </ul>
<b>Assistant Director, Office of Information Resource Management</b>	<ul style="list-style-type: none"> <li>• Ensure that DOE Records Management Program provisions and standards are included in the scope and planning for all electronic information systems utilized by the EMCBC and support sites.</li> <li>• Provide Records Management staff with appropriate support for Electronic Records Management System (ERMS) to ensure all records (regardless of media) are properly managed within the ERMS.</li> </ul>
<b>Assistant Director, Office of Chief Counsel</b>	<ul style="list-style-type: none"> <li>• Administer the Privacy Act and Freedom of Information Act Programs for the EMCBC.</li> <li>• Review and provide approval/disapproval of all record destruction requests for the EMCBC and EM Small Sites (Federal and Contractor).</li> </ul>
<b>Records Custodian (EMCBC) / Records Coordinator (EM Small Sites)</b>	<ul style="list-style-type: none"> <li>• Coordinate records management activities within their respective organization/site to ensure compliance with the Records Management Program.</li> <li>• Act as the Point-of-Contact for issues, concerns, and questions regarding records management activities for their respective organization and/or site.</li> </ul>
<b>EMCBC and EM Small Site Employees (Federal and Support Service Contractors)</b>	<ul style="list-style-type: none"> <li>• Identify information created or received, regardless of the media form as a record, non-record, or quality assurance record.</li> <li>• Ensure records are maintained so that they are accessible and easy to retrieve in accordance with EMCBC Records Management Policies and Procedures (or applicable site procedures).</li> </ul> <p>These responsibilities apply to all records, regardless of media (email, electronic, paper, etc.).</p>

## 3.0 Management System Operation

### 3.1 Overview

Records Management is the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation/receipt, records maintenance and use, and records disposition to support statutory, regulatory, fiscal, operational, and historical activities within our organizations.

The EMCBC's Electronic Records Management System (ERMS) is Autonomy Records Manager (ARM) (previously known as CA Records Manager or CARM), which is a Department of Defense (DoD) 5015.2, "Electronic Records Management and Design Criteria Standard for Electronic Records Management Software Applications" certified system and is compliant with the National Archives and Records Administration (NARA) electronic recordkeeping requirements.

ARM is currently configured to manage e-mail (including attachments) and paper records; configuration has not been completed for other electronic records that are maintained on individual's personal drive, shared drive or within SharePoint (see SAP-OTSAM-243-08 Identifying, Filing, and Maintaining Electronic Records for interim steps). The ERMS is capable of managing records in various media (i.e., electronic, photographs, etc.) and has stringent processes/procedures for ensuring applicable records management requirements are met (i.e., maintenance, retrieval, disposition, security, etc.).

### 3.2 Key Program and Technical Elements

The Records Management program consists of the following Program and Technical Elements:

- **Program Elements**
  - **Recordkeeping Requirements** – Recordkeeping requirements are statements in statutes, regulations, agency directives, and other authoritative issuances providing general and specific information on particular records to be created and maintained by the agency.
  - **Creation / Receipt** – A successful records management program begins with having good information management practices at the creation/receipt of the information, regardless of media, and utilizing those practices throughout the life cycle of the record. The manner in which the records are created and collected impacts upon records maintenance, use, and disposition. With most records being created and received electronically, records management functions (records lifecycle) are managed within an Electronic Records Management System (ERMS).
  - **Inventory and File Plan** – A successful records management program is founded on the knowledge of what records are created/received and where they are located. Once records are inventoried, a file can be created that will provide

the necessary information to ensure records are properly scheduled, arranged, cutoff and dispositioned.

- **Scheduling and Disposition Processes** – A key part of any successful records management program is having a schedule indicating how long a record is kept before it is transferred to inactive storage facilities, Federal Records Centers, other Federal agencies, National Archives Records Administration (NARA), or destroyed. For consistency of application, the schedules must be current, clear, specific, and verified periodically.

No records can be destroyed without the approval of the Archivist of the United States (36 CFR 1228), which is given through the NARA-approved DOE Records Disposition Schedules.

Further, records may not be removed from Federal custody or destroyed, without regard to the provisions of these schedules. The unauthorized destruction, removal, or mutilation of records is punishable by fines and imprisonment as specified in 18 U.S.C. 2071.

- **Record Requests** – A successful records management program contains access controls to protect information and records against loss, destruction, or alteration; and to ensure security requirements are met. Access controls limit both the people who may obtain the information or record, and ensures that the people who have rights to such information are allowed access.
- **Records Storage** – DOE must ensure the proper storage of records based on NARA requirements and the media, which may require additional storage considerations (e.g., quality assurance records, contaminated records, X-rays, electronic, records moratoriums, etc.).
- **Disaster Prevention and Recovery Program** - Policies, plans, and procedures to protect and to reconstruct records in the event of an emergency or disaster must be in place.
- **Vital Records Program** – Policies, responsibilities and requirements to identify (vital records inventory) and protect legal and financial rights records and emergency operating records are needed to ensure the continuity of operation and performance of essential functions during an emergency or disaster and resumption of normal business operations thereafter.
- **Technical Elements**
  - **Declassification Initiative** – Declassification is the process that certifies the safe disclosure of information previously withheld for national security reasons [Classified record functions are performed by the EMCBC Classification Office, Lakewood, CO].

- **Epidemiology Records** – Epidemiology records are documents that contain industrial hygiene; worker identification and laboratory test results; and site organization configuration and operation information.
- **Contaminated Records** – Contaminated records are those records containing external impurities that render the media on which the records are stored unsafe for human handling without special precautions.
- **Contract Language and Government / Contractor Ownership** – 36 CFR 1222.32 clearly states that, “Agencies must specify in the contract Government ownership and the delivery to the Government of all records necessary for the adequate and proper documentation of contractor-operated agency activities and programs...” Therefore, all contracts issued by DOE, regardless of type, should be evaluated by the appropriate staff to determine the appropriate records management regulations, requirements and scope to include.
- **Site Transition** – A process that is utilized when a site (or work at a site) is transferred from one Program entity to another. For example, from Environmental Management (EM) to Legacy Management (LM). This process typically involves developing various plans and documents to ensure the proper transition, including a site transition plan, information and records management transition plan, etc. and needs to be a joint effort with the appropriate staff.
- **Administrative Record (AR)** – The complete body of records that documents an agency’s decision-making process and the basis for the agency’s decision; there are different types of AR’s based on a regulatory and site requirements (CERCLA, NEPA, RCRA, etc.).
- **Privacy Act, Freedom of Information** – The Privacy Act and the Freedom of Information Act (FOIA) are laws that prescribe special policies, principles, standards, and techniques for the maintenance, use, and access to certain Federal records. The Privacy Act specifically addresses managing records that are searchable and retrievable by a person's name or a unique identifier. FOIA addresses public access to existing Federal records, except those records that are exempt from FOIA. **At the EMCBC, determining or reviewing FOIA exemptions is performed by the Office of Chief Counsel. Records Management provides support by performing Privacy Act or FOIA record searches.**

**EMCBC RECORD OF REVISION**

**DOCUMENT TITLE: Records Management**

If there are changes to the controlled document before the two-year review cycle, the revision number stays the same; one of the following will indicate the change:

**I** Placing a vertical black line in the left margin adjacent to sentence or paragraph that was revised; or

**I** Placing the words GENERAL REVISION at the beginning of the text. This statement is used when entire sections of the document are revised.

If changes and updates occur at the two-year review cycle, the revision number increases by one.

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<b>Rev. No.</b>	<b>Description of Changes</b>	<b>Revision on Pages</b>	<b>Date</b>
0	Initial MSD, New Format	All	8/9/2012
1	Updated MSD , Formatting	All	10/05/2015