

<b>Management System: Records Management</b>
--

<b>Subject Area: Records Management</b>
---

<b>Procedure: Vital Records Identification and Protection</b>
---

<b>Issue Date and Revision Number:</b> 10/05/15      1	<b>Lead Subject Matter Expert:</b> Jackie Schoultheis or Kathy Reid	<b>Management System Owner:</b> John Sattler
---	--	---

## 1.0 Applicability

This procedure applies to all Environmental Management Consolidated Business Center (EMCBC) organizations and may be adopted by an Environmental Management (EM) small site or supported site, at their discretion.

## 2.0 Required Procedure

The purpose of this procedure is to establish a process for the identification, maintenance and storage of vital also known as essential records. A vital records program provides the information needed to conduct business under other than normal operating conditions and to allow for business to resume afterwards. It also enables the EMCBC to identify and protect the most important records pertaining to legal and financial rights of the organization and of persons directly affected by the agency's actions.

The objectives of a vital records program are:

- Identify records containing information that programs need to conduct business under emergency operating conditions (Emergency Operating Record).
- Identify those records that support and are needed for the performance of the EMCBC's most critical functions. See EMCBC's Continuity of Operations Plan (COOP), PP-OTSAM-150-01, Rev. 0.
- Identify legal and financial rights records needed to protect the Department of Energy (DOE), its employees, and the people it serves.
- Develop policies, procedures, and plan of action that will allow for the assessment of damage to and the recovery of any records that may be affected by an emergency or disaster, regardless of medium of the records.
- Develop and implement cost effective methods, including off-site storage and the application of technology, to protect and safeguard those records identified as vital from loss, misuse, and unauthorized information access or modification.

▲ Clarifying terms if adopted by an EM small site:

- Records Coordinator (RC) replaces the term Record Custodian (RC).
- The small sites Records Management Field Officer (RMFO) replaces the term RMFO.
- Federal Project Director (FPD) replaces the term Assistant Director (AD)

<p><b>Step 1</b></p>	<p>AD, in conjunction with their organizational RC shall identify which records within their physical and legal custody are essential to continue operations during a local or national emergency or disaster.</p> <p>▲ Note: A rule of thumb for identifying and managing vital records is to ask, for each record:</p> <ul style="list-style-type: none"> <li>• Can the office’s essential functions continue without that record?</li> <li>• Can the record be found elsewhere or can the record be reconstructed?</li> <li>• Is the record already protected elsewhere?</li> <li>• Organizations must exercise caution in designating records as vital, only those records or electronic information systems (or portions of them) most critical to emergency operations or the preservation of legal or financial rights should be designated.</li> </ul> <p>Record media shall not affect the determination of whether a record is, or is not, a vital record.</p> <p>See Attachment 1, “Is it a Vital Record?” for additional guidance. See Attachment 2, “EMCBC Vital Records Inventory” for an example of the required information.</p>
<p><b>Step 2</b></p>	<p>AD, in conjunction with their organizational RC shall categorize records identified as vital as either emergency operating records or legal and financial rights records.</p> <p>Emergency operating records are to be divided into three categories:</p> <ul style="list-style-type: none"> <li>• Records needed in the first few hours of an emergency (Tier 1);</li> <li>• Records necessary to respond to the emergency (Tier 2); and</li> <li>• Records that are the most critical to the essential functions (Tier 3).</li> </ul> <p>▲ Note: See the emergency operating records definition for Tier 1-3 definitions.</p> <p>Legal and Financial Rights records not maintained at the CBC (e.g., systems maintained at HQ) are not required to be duplicated as the records are maintained within a separate system sufficiently remote from the EMCBC.</p>

<b>Step 3</b>	Records Management (RM) staff shall work with the ADs, and RCs to determine duplication, dispersal and system backups and who is responsible for each process.
<b>Step 4</b>	<p>RM staff in conjunction with the RC determine the method and storage location of vital records.</p> <p>▲Note: Items to keep in mind regarding method and storage location:</p> <ul style="list-style-type: none"> <li>• Store records to ensure ease of access, retrieval, control, and timely access. Please refer to SAP-OTSAM-243-01, Identifying, Filing and Maintaining Paper Records for the appropriate handling/storage of OOU, UCNI and UCI Information.</li> <li>• Store vital records at alternate location or COOP site.</li> <li>• Duplicate copies of vital records stored in a separate location should be destroyed when obsolete or superseded and replaced with the updated version.</li> <li>• Original vital records must be maintained for the period specified in the Organizational File Plan (in accordance with the DOE records disposition schedules).</li> </ul> <p><u>On-site Storage of Vital Records (paper) (EMCBC/Chiquita Center)</u></p> <ul style="list-style-type: none"> <li>• Fire resistant cabinets and safes are best used for small quantities of very active vital records that need to be kept in close proximity to the user.</li> <li>• No vital records are to be stored on-site in standard file cabinets or open-shelf files, unless there is a duplicate of the record off-site. The area that vital records are stored shall be inspected for water leaks on a monthly basis by the RC or RM staff. Leaks may appear on ceiling or floor tiles, or along walls or windows. The inspection shall be documented utilizing form FM-OTSAM-243-04-F1 Rev. 1, EMCBC Records Disaster Prevention Inspection Checklist.</li> </ul> <p>▲Note:  If Vital records are retained in their current location and not duplicated, a risk assessment is required by Federal Continuity Directive (FCD)-1.  The EMCBC Continuity plan must address or provide instructions on moving these vital records from the primary operating facility to the alternate site (if required) as required by FCD-1.  The EMCBC Continuity Plan must provide appropriate documentation and/or instructions for accessing essential records in an emergency situation as required by FCD-1.</p>

	<p><u>Off-site Storage of Vital Records –(COOP/or Alternate Storage Site)</u></p> <p>When vital records are protected by duplicating, the duplicate copy shall be stored at an off-site facility.</p> <ul style="list-style-type: none"> <li>• Copies of emergency operating records must be readily available when needed.</li> <li>• The facility shall have temperature and humidity control and 24-hour security.</li> <li>• The facility shall have a sprinkler system and/or a smoke detection system, which alerts emergency officials when activated. Either or both shall alert the local enforcement officials that the system has been activated. The area shall have one or more fire extinguishers.</li> <li>• The facility shall have equipment to reproduce records, should the need arise.</li> <li>• The facility shall be available to appropriate personnel at all hours in the case of an emergency.</li> <li>• The area that vital records are stored in shall be inspected for water leaks on a monthly basis by RM staff utilizing form FM-OTSAM-243-04-F1, Rev. 1 EMCBC Records Disaster Prevention Inspection Checklist. Leaks may appear on ceiling or floor tiles, or along walls or windows. Ensure that the area where vital records are stored is not located in a flood plain designation.</li> <li>• The facility shall be professionally treated and inspected for insects and rodents on an annual basis.</li> </ul> <p>The EMCBC alternate offsite location (COOP site) is 175 Tri-County Parkway, 20 miles from the EMCBC downtown Cincinnati Office. The Office of Technical Support and Asset Management will maintain paper vital records in the designated Records storage area at 175 Tri-County Parkway, Suite C3.</p>
<p><b>Step 5</b></p>	<p>ADs shall review the vital records inventory annually and provide comments/no comment responses to the Records Management (RM) staff.</p> <p>▲ Note: See Attachment 2 for the current EMCBC Vital Records Inventory.</p>
<p><b>Step 6</b></p>	<p>RM staff shall maintain vital records in paper format in a designated Records storage area(s). Provisions for storing and maintaining records must include the following:</p> <ol style="list-style-type: none"> <li>a) Duplicate copies of the vital records and associated inventory must be maintained at separate locations to ensure immediate access in any situation.</li> <li>b) Records must be maintained in a medium that is most viable for readability under post-attach conditions, including the appropriate</li> </ol>

	<p>hardware and software necessary to access the records.</p> <p>c) Ability to retrieve records quickly during an emergency or disaster.</p> <p>▲Note: It is essential to develop a rotation schedule to keep the records up to date and to dispose of duplicates that are no longer needed. If electronic backups are maintained, the software and hardware must be routinely tested.</p>
<b>Step 7</b>	<p>RM staff shall work with the Office of Information Resource Management (OIRM) to designate appropriate areas on the network for the storage and maintenance of electronic records and associated backups. Provisions for storing and maintaining electronic records must include the following:</p> <p>a) Electronic records must be evaluated and stored as necessary regarding –</p> <ol style="list-style-type: none"> <li>1) volume,</li> <li>2) frequency of updates,</li> <li>3) electricity, computers, and software support services available to support records access and use, and</li> <li>4) accessibility from remote locations via virtual private networks or compact disks.</li> </ol> <p>b) Storage/backup protection methods must be selected based on–</p> <ol style="list-style-type: none"> <li>1) evaluation of the effectiveness of the protection,</li> <li>2) cost,</li> <li>3) degree of risk for potential loss,</li> <li>4) physical susceptibility to destruction, and</li> <li>5) need for special environmental conditions for transport, storage, and update.</li> </ol>
<b>Step 8</b>	<p>RM staff shall update the vital inventory annually based on comments from ADs.</p>
<b>Step 9</b>	<p>RCs shall work with the RM staff to ensure records are cycled as determined by the vital records inventory.</p>
<b>Step 10</b>	<p>OIRM shall maintain necessary system backups, including those for electronic records determined as vital records.</p>

### 3.0 References – Forms/Attachments

#### 3.1 References

- PP-OTSAM-150-01, Rev. 0 - EMCBC Continuity of Operations Plan (COOP)
- SAP-OTSAM-243-04, Rev. 1 Records Management Procedure: EMCBC Records Disaster Prevention Inspections

### 3.2 Forms

- FM-OTSAM-243-04-F1, Rev. 1 - EMCBC Records Disaster Prevention Inspection Checklist

### 3.3 Attachments

- Attachment 1: Flowchart, Is it a Vital Record?
- Attachment 2: EMCBC Vital Records Inventory

## 4.0 Records Generated

Records generated through implementation of this procedure are identified as follows and are maintained by the Office of Technical Support & Asset Management (OTSAM) in accordance with the EMCBC Organizational File Plan.

<b>Records Category Code</b>	<b>Records Title</b>	<b>Responsible Organization</b>	<b>QA Classification (Lifetime, Non-Permanent or N/A)</b>
ADM 16-01.5-B	Vital Records Inventory	Office of Technical Support & Asset Management	N/A
ADM 16-07	Records Management Files - Records Disaster Prevention Inspection Checklist	Office of Technical Support & Asset Management	N/A

**EMCBC RECORD OF REVISION****DOCUMENT TITLE: Vital Record Identification and Protection**

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.

---

<b>Rev. No.</b>	<b>Description of Changes</b>	<b>Revision on Pages</b>	<b>Date</b>
0	Initial	All	04/01/13
1	Two Year Review, Format	All	10/05/15