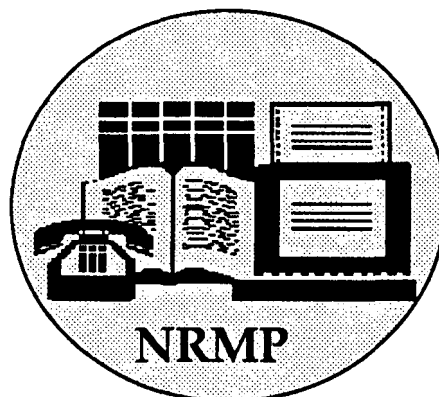


Response to the National Archives and Records Administration (NARA) Evaluation of EPA's Records Management Program



July 1992

**National Records Management Program
Information Access Branch
Office of Information Resources Management
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL - 7 1992

OFFICE OF
ADMINISTRATION
AND RESOURCES
MANAGEMENT

Mr. James W. Moore
Assistant Archivist for Records
Administration
National Archives and Records
Administration
Washington, D.C. 20408

Dear Mr. Moore:

This letter transmits the Environmental Protection Agency's (EPA's) response to the National Archives and Records Administration (NARA) evaluation of EPA's records management program. We appreciate the effort of the NARA staff in conducting the evaluation as well as their offers of continued support for our program as we begin implementing the recommendations. We look forward to working together to resolve the issues identified in the evaluation.

Our response package consists of three parts: the Executive Summary, which provides an overview of our implementation strategy; the Agency's Recommendation and Actions Matrix, which provides actions and milestones for each recommendation; and individual Implementation Plans for each major Headquarters program, Regional Office, Laboratory, and field facility. Since many of the recommendations concern how Agency policy is implemented, these program implementation plans are in many ways the most important part of the package. A few programs are still preparing their plans and those will be forwarded to you as soon as they are completed.

Overall, we agree with the recommendations in the evaluation. They are consistent with our own findings and provide us with a framework for improving our records management program. In a few instances, we do have concerns about implementing the recommendations on an Agency-wide basis. We have presented our interpretation of how the

recommendations should be implemented in the Executive Summary. We would be pleased to discuss our approaches after you have reviewed our response package.

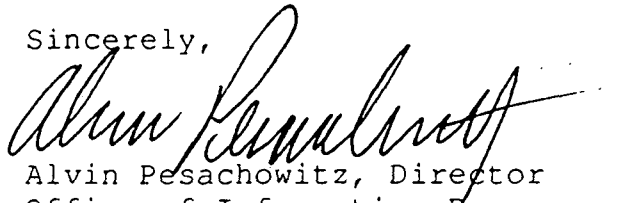
Our goal is to have the recommendations implemented in most Agency programs by the end of FY95. As you will note in the attached action plans, many of the recommendations either have been or are being addressed. To date, we have made the most progress in implementing the recommendations concerning communication, policy, and awareness which were implemented by our Office of Information Resources Management.

Other recommendations will require extensive fact finding, consultation, and coordination within the Agency and will take longer to resolve. The approach we have taken for those recommendations is to provide a detailed set of milestones for FY93, and general goals for future years. Specific steps to meet the goals will then be completed on an annual basis.

I recognize the importance that a strong records management program plays in the efficient operation of the Agency's management of its information. A key recommendation in your report is to improve the communication of records management responsibilities to all employees. To show my support of the effort, I will use the evaluation report as an opportunity to remind all staff of their role in the Agency's records management program.

We look forward to your comments on our implementation plans, both the Agency-wide plan and the individual program plans. We view these plans as living documents, subject to revision and refinement based on your comments and our experience, in implementing the recommendations. If you have any questions, please contact Michael Miller, Agency Records Officer, on (202) 260-5911.

Sincerely,



Alvin Pesachowitz, Director
Office of Information Resources
Management

Attachments

Executive Summary

This report provides a response to the evaluation performed by the National Archives and Records Administration (NARA) of the Environmental Protection Agency's (EPA's) records management program during Fiscal Year (FY)1990. Overall, EPA finds the report to be an accurate depiction of the challenges that the Agency's records management program is facing and is in agreement with the recommendations provided by NARA for addressing these challenges.

More specifically, NARA provided EPA with 36 recommendations which cross the records management spectrum. For the purposes of facilitating a response to the report, EPA has classified these recommendations into five categories:

- *Overall Program Management* - Those recommendations addressing program-wide issues, such as advocating establishment of a records management liaison network.
- *Creation and Maintenance* - Those recommendations that address the creation of a record or the process of maintaining that record at the Agency.
- *Records Disposition* - Those recommendations that suggest improvements in the process of retiring or disposing of records.
- *Specific Categories* - This category includes all recommendations that address specific categories of records, such as Superfund or contractor records.
- *Electronic and other Nontextual Records* - Recommendations that address records created in an electronic, audiovisual, or other nontextual format.

Addressing and implementing recommendations in each of these areas will require long-term changes and improvements in EPA's records management program. Implementing these improvements will require EPA to take actions in three primary areas:

- *Improving Policy and Guidance* - This area involves the need for either updating or issuing new records management policy and/or guidance.

Executive Summary

- *Communicating Policy and Regulations Clearly* - Actions in this area require the communication of existing policies or regulations either to specific parties or throughout the Agency.
- *Improving Operational Performance* - Actions in this category are targeted at improving operations in the records management arena.

The graphic on the following pages illustrates, for each of NARA's recommendations, the areas in which actions will need to be taken.

The Office of Information Resources Management (OIRM) within EPA, more specifically, the National Records Management Program (NRMP) will provide leadership in carrying out many of these recommendations through its primary responsibilities of planning, issuing policy and guidance, communicating requirements, conducting performance evaluations and reviews, and providing technical assistance and training. Actual implementation of these recommendations will be the responsibility of program and other administrative offices throughout Headquarters, the Regions, and the Laboratories due to the need to improve operations and to establish new functions and programs.

OIRM is drafting a revised basic policy statement and developing new policy directives to clarify roles and responsibilities and address the issues set forth in the NARA report, as well as those regulations mandated by other Federal agencies. Additionally, an Agency-wide series of guidance manuals will be issued by OIRM. Based on Agency policy, they will provide additional direction and a framework for implementing required Federal regulations, and NARA's recommendations.

As an additional effort to communicate records management requirements, and specifically discuss the recommendations set forth in the NARA report, OIRM held a working meeting attended by 35 records management officers in Chicago. OIRM, along with the records management officers, reviewed all phases of the NARA report and discussed the need for cooperation and understanding program priorities when implementing the recommendations. To follow-up on feedback received at the meeting, OIRM will be issuing basic records management guidance to support Headquarters', regional and laboratory efforts to initiate activities pursuant to the NARA report.

All recommendations are targeted for completion prior to/ or during FY 1995. In fact, many recommendations have been addressed already through corrective actions taken at EPA. Others are targeted for near-term implementation based on feasibility in the short term and their ability to effect significant improvement within EPA's records management program. The remaining recommendations will be implemented over the next several years as is feasible and appropriate.

Summary of Implementation Approach

In each of the five recommendations categories, EPA is planning to take specific actions to address the issues raised in the NARA report. A summary of these actions, by recommendations category, is presented below along with a discussion of the responsible office and a time table for undertaking the particular action. A matrix, which discusses specific actions relative to each recommendation, is contained in the next section.

Overall Program Management

Eight recommendations were placed in the Overall Program Management area. These recommendations involve increasing communication amongst records managers in the Agency, establishing accountability for records functions, enhancing training, and implementing regular internal evaluations. Addressing these recommendations will require EPA to take actions in three areas: improving policy and guidance (1 recommendation), communicating policy and regulations clearly (5 recommendations), and improving operational performance (4 recommendations).

OIRM will be the lead office for all of the recommendations requiring policy improvement and clearer communication. The Office of Research and Development combined with the Assistant Administrators (AAs), Regional Administrators (RAs), and the Lab Directors will be accountable for recommendations requiring operational improvements.

With respect to four of these recommendations, EPA has already taken actions to address the relevant issue. Specifically, OIRM has developed a records management liaison network that increases lines of communication at Headquarters and the Regions (recommendations 1-1, 1-5, and 1-8). Additionally, OIRM has carried out its plans to develop and offer formal records management training courses as specified in the report (recommendation 1-6) and has expanded records management briefings for senior staff (recommendation 1-8). The recommendations will be implemented over time beginning in FY 1992 with targeted completion dates during or before FY 1995. However, we would like to clarify our interpretation of recommendation 1-3 concerning the need for a full time employee (FTE) which we take to mean an Agency employee and not a contractor. Although Agency programs are increasingly turning to FTE to staff such positions, the process is a gradual one. Some programs may choose initially to staff the position with adequately qualified contractors supervised by Delivery Order Project Officers experienced in records management issues. We find this an acceptable alternative to an FTE, given the scarcity of Agency resources.

RECOMMENDATIONS OVERVIEW

Categories of Recommendations	Actions for Improvement		
	Improve Policy or Guidance	Communicate Policy and Requirements More Clearly	Improve Operational Performance
1. OVERALL PROGRAM			
1-1 Increase headquarters and regional lines of communication		●	
1-2 Establish oversight for laboratories			●
1-3 Establish trained full time records officers in every major EPA office		●	●
1-4 Appoint local officers at all sites with sufficient time			●
1-5 Develop active records liaison network		●	
1-6 Carry out plans for training courses		●	
1-7 Implement a program of regular internal evaluations	●		●
1-8 Expand briefings for senior staff		●	
2. RECORDS CREATION AND MAINTENANCE			
2-1 Provide basic recordkeeping requirements for EPA	●		
2-2 Develop recordkeeping requirements for specific programs based on Superfund practices	●		
2-3 Use these requirements to monitor mission critical programs			●
2-4 Review case filing procedures			●
2-5 Make mandatory the administrative systems file classification system	●		
2-6 Inform and designate program offices of file station requirements		●	
2-7 Eliminate personal filing systems and duplicate records		●	●
2-8 Implement file cutoffs for manageability		●	●
2-9 Examine policy on storage to ensure maximum use of the FRCs	●		
2-10 Implement an Agency wide vital records program		●	●

RECOMMENDATIONS OVERVIEW

Categories of Recommendations	Actions for Improvement		
	Improve Policy or Guidance	Communicate Policy and Requirements More Clearly	Improve Operational Performance
3. RECORDS DISPOSITION			
3-1 Inventory records, revise schedules and identify custodian, particularly for permanent records		●	●
3-2 Organize schedules into a comprehensive records manual		●	
3-3 Review revised schedules annually			●
3-4 Conduct campaign to apply these schedules		●	●
3-5 Inform employees of policy and law on disposition		●	
3-6 Re-examine Green Border for schedule approval	●		
4. SPECIFIC RECORDS			
4-1 Re-examine schedules for Superfund records			●
4-2 Continue to consider alternate storage media			●
4-3 Develop more rigorous case file requirements for NPL			●
4-4 Inspect all facilities housing Superfund site files			●
4-5 Increase EPA oversight of Superfund records program			●
4-6 Develop Agencywide strategy for oversight of records managed by contractors	●		
5. ELECTRONIC AND OTHER NONTEXTUAL RECORDS			
5-1 Revise and expand existing electronic record guidance	●		
5-2 Take recommended steps to improve disposition of electronic records		●	●
5-3 Include electronic record guidance in training		●	
5-4 Issue and implement a policy affirming disposability of paper records once microfilmed	●		
5-5 Inventory audiovisual records			●
5-6 Develop program for managing audiovisual records	●		●

Program managers have the final responsibility in determining the best way to utilize both contract staff and FTE to accomplish their mission, so that how, and how quickly, this recommendation is implemented, will vary from program to program.

Records Creation and Maintenance

Ten recommendations fall into this category. These recommendations suggest the need for:

- Additional guidance on recordkeeping and storage requirements
- Communication of records creation and maintenance policies
- Mandatory use of guidelines
- Implementation of vital records program procedures.

To implement these recommendations, actions will need to be taken in the areas of improving policy and guidance (5 recommendations), enhancing communications (4 recommendations), and improving operational performance (5 recommendations).

OIRM will be the lead office for creating and issuing Agency-wide policy and guidance and for communicating this policy and guidance, where appropriate. As discussed in recommendations 2-4 and 2-5, OIRM will provide some general guidelines for filing procedures and classification systems, (i.e., using 'ENF' as an Agency-wide code for enforcement files) in order to streamline operations and accommodate record retrieval. However, due to the diversity of Agency activities and unique filing needs and records maintained in individual offices, each program will be responsible for developing more detailed guidelines on their own filing procedures and classification systems. The AAs, RAs, and Lab Directors will develop the necessary program-specific guidance and improve current operational practices, including identifying and maintaining vital records and measuring overall progress against requirements.

These recommendations will also be implemented over the next several years. In FY 1992, EPA will address the recommendations requiring Agency-wide policy. In FY 1993, program-specific policy will be developed, and policies will be communicated. During FYs 1994 and 1995, implementation of the operational improvements will be

emphasized, particularly with respect to improving records creation and maintenance in preparation for the 1995 Headquarters move.

Records Disposition

The Records Disposition category has 6 recommendations which focus on inventorying records, revising disposition schedules, and encouraging use of the disposition schedules. A further recommendation suggests examination of ways to improve the schedule review and approval process. Addressing these recommendations will require EPA to improve policy and guidance (1 recommendation), to communicate policy and guidance clearly (4 recommendations), and to improve operational performance (3 recommendations).

With respect to issues requiring policy and enhanced Agency-wide communication, OIRM will be the lead office. Program-specific communications as well as implementing other operational improvements will be the primary responsibility of the AAs, RAs, and Lab Directors.

OIRM has developed the basic steps to address these recommendations, which include: surveying records, revising schedules in a new format, reviewing schedules and adding additional items, and finally, inventorying records using revised schedules, which allow the addition of additional items if needed. These recommended activities will need to occur in a logical progression beginning in FY 1992 with an examination of the schedule review and approval process. The remaining recommendations will be addressed in sequential order starting with the records inventory, followed by revision, communication, and implementation of the schedules occurring in FY 1993 through FY 1995.

Specific Records

The Specific Records category includes six recommendations. These recommendations focus on improvements to Superfund records maintenance and disposition practices as well as oversight of contractor records. To address these recommendations, EPA will need to improve policy and guidance (1 recommendation) and enhance operational performance (5 recommendations).

With the exception of development of an Agency-wide strategy, which is OIRM's responsibility, all recommendations in this category require the leadership of the Office of Solid Waste and Emergency Response (OSWER).

Many of these recommendations are either already being addressed or can be addressed in the short term. For example, the potential of alternate storage media is already being examined in the Superfund Program. All other recommendations requiring improvements in operational performance are targeted for implementation in FY 1992. The recommendation to encourage initiation of a program to inspect all facilities housing Superfund site files is targeted for FY 1993.

Electronic and other Nontextual Records

Seven recommendations fall into this category. These recommendations highlight the need for additional guidance on electronic records, revised disposition schedules, training on electronic records, and creation of a program for managing audiovisual records. Implementation of these recommendations will require EPA to take action to: improve policy and guidance, enhance communications, improve operational performance, and establish new programs.

OIRM will provide leadership in all areas related to electronic records with the assistance of the AAs, RAs, and Lab Directors when addressing disposition of electronic records. OIRM plans on conducting the disposition and scheduling of electronic records in a three phased approach beginning with the major information systems identified by the NAPA project and GSA. Next, information systems sponsored by Headquarters programs will be scheduled in conjunction with their textual records. Finally, the regionally based systems will be scheduled. EPA's Office of Communications, Education, and Public Affairs (OCEPA), which already provides the Agency with audiovisual expertise, will serve as the lead for inventorying audiovisual records and developing a new program to manage these records.

These recommendations are also targeted for implementation in the near term due to their potential for effecting significant improvements in the current management of these records. The policy issues will be addressed beginning in FY 1992, followed by the inventory, and the development of training and new programs. As with all other recommendations, those in this category are targeted for complete implementation by FY 1995.

Overall Implementation Approach

The previous section provided a summary of how EPA plans to address NARA's recommendations, the office that is accountable for implementation, and the time frame involved. The matrices contained in the next section provide further detail on the specific actions planned for each recommendation, and any

already completed actions that address the recommendation. Additionally, the matrices indicate the overall Agency goals and a target implementation date for each activity. When applicable, OIRM requirements for Headquarters, Regions, and Laboratories have also been included with their target implementation dates. The target implementation, or completion dates have been estimated on a quarterly basis through FY 1993. During the third quarter of FY 1993, the planned implementation dates for FY 1994 and 1995 will be adjusted to reflect a quarterly schedule. Finally, attached to the matrices are the specific implementation plans that were submitted to OIRM by Headquarters, Regions, and Laboratories. These plans are the original, unaltered submissions, and some contain more detail than others. This is due to the varying lengths of time individual offices have been engaged in records management practices. In the event that some action plans have not been received by OIRM prior to submission of this response, they will be sent to NARA under a separate cover following their receipt.

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
I. OVERALL PROGRAM MANAGEMENT			
<p>1-1 Increase records management contact between headquarters and regional records management, headquarters records management and program offices, and regional records management and regional program offices. Regular and systematic lines of communication, both written and oral, need to be established for providing current information on agency initiatives and activities in records management, supplying the most current NARA and agency guidance, and receiving feedback on problems encountered in implementation. The purpose is to ensure that:</p> <p>a. all EPA records managers are aware of current records management policies, procedures, and regulations.</p>	<p>OIRM has established a program and network to improve communication. Will also be carried out in relation to recommendation 1-5.</p> <p>OIRM: Established records network in Regions</p> <p>Established network in HQ and holding bi-monthly meetings; will be held monthly in September</p> <p>Established network in Field Offices and Laboratories</p> <p>Transmitted copies of all policies, procedures, and regulations to primary contacts in all major programs</p> <p>Held Agencywide and HQ records management meetings in FY 91 and FY 92</p> <p>Established bi-monthly Records Management newsletter</p>		<p>FY 92</p> <p>FY 91</p> <p>FY 92</p> <p>FY 92</p> <p>FY 92</p> <p>FY 92</p> <p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-1 Increase records management contact between headquarters and regional records management, headquarters records management and program offices, and regional records management and regional program offices. Regular and systematic lines of communication, both written and oral, need to be established for providing current information on agency initiatives and activities in records management, supplying the most current NARA and agency guidance, and receiving feedback on problems encountered in implementation. The purpose is to ensure that:</p> <p>b. all EPA program offices are aware of and comply with records management policies, procedures, and regulations as they pertain to their respective program records.</p>	<p>OIRM con't. Established weekly messages for primary contacts in all programs to provide updates on records management issues</p> <p>Established bi-monthly teleconferences with Regional and field offices</p> <p>HEADQUARTERS: All programs must establish a plan for making their personnel aware of policies, procedures and regulations; compliance will be discussed in recommendation 1-7</p> <p><i>See attached plans</i></p> <p>REGIONS: <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond- See attached plans</i></p>	<p>3rd QTR FY 93</p>	<p>FY 92</p> <p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-2</p> <p>Establish mechanisms to ensure that the provisions of recommendation 2-1b are implemented at all EPA laboratories. The laboratories must receive regular records management oversight and guidance similar to other EPA components. For research and development laboratories that are not under the jurisdiction of the regional offices, active oversight must come from headquarters. Because laboratories are often not co-located with other facilities, special efforts must be made by records management officers to establish regular oral and written contacts with the laboratories and to provide on-site support as necessary.</p>	<p>ORD to improve operational performance</p> <p>OIRM: Identified records contacts in labs and field offices</p> <p>Providing records management guidance and procedural materials</p> <p>ORD:</p> <p><i>ORD must respond- See attached plans</i></p> <p>REGIONS:</p> <p><i>Regions must respond for ESD- See attached plans</i></p> <p>LABORATORIES:</p> <p><i>All labs must respond- See attached plans</i></p>	<p>FY 93</p> <p>FY 93</p> <p>FY 93</p>	<p>FY 92</p> <p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-3 All regional records management officer positions should be made full time to ensure proper oversight of the agency's records management program. Ultimately, there should be a trained, full-time records officer in every region and in major program offices such as Assistant Administrators Offices, the General Council, and the Inspector General. Because these staff members will have substantive documentation responsibilities and will be responsible for training, evaluations, assistance with the system development and other related activities, they need to be people with appropriate skills and seniority.</p>	<p>AAs and RAs to improve operational performance. To be completed over time, showing continual improvement. Will be carried out in relation to recommendation 1-4.</p> <p>OIRM: Guidance on staffing contained in Regional Records Management Procedures Manual</p> <p>OSWER and OIRM conducting a study on records management positions</p> <p>Additional guidance on staffing to be produced</p> <p>OIRM to work with OSWER on position description</p> <p>HEADQUARTERS:</p> <p><i>All programs must respond- See attached plans</i></p> <p>REGIONS:</p> <p><i>All regions must respond- See attached plans</i></p>	<p>FY 95</p> <p>2nd QTR FY 93</p> <p>3rd QTR FY 93</p> <p>FY 95</p> <p>FY 95</p>	<p>FY 92</p> <p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-4 Implement the instructions of Chapter 1 of the Records Management Manual, paragraph 10 a(2) by appointing local records management officers at all sites throughout the agency. In accordance with this regulation, these records management officers must have appropriate status (grade and position) and sufficient time to devote to the program.</p>	<p>AAs, RAs, and Lab Directors to improve operational performance. To be completed over time, showing continual improvement. Will be carried out in relation to recommendation 1-3.</p>	<p>FY 95</p>	
	<p>OIRM: OIRM to issue policy directives and guidance clarifying roles and responsibilities; to be implemented by Headquarters, Regions and Laboratories</p>	<p>FY 93</p>	
	<p>Interim guidance to be issued</p>	<p>1st QTR FY 93</p>	
	<p>Policy directive to be issued</p>	<p>1st QTR FY 94</p>	
	<p>Individuals have been nominated for positions</p>		<p>FY 92</p>
	<p>Programs provided guidance on determining positions</p>		<p>FY 92</p>
	<p>HEADQUARTERS: Individuals have been nominated for positions</p>		<p>FY 92</p>
	<p>Positions to be brought into compliance with regulations</p> <p><i>All programs must respond- See attached plans</i></p>	<p>FY 95</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-4 cont. Implement the instructions of Chapter 1 of the Records Management Manual, paragraph 10 a(2) by appointing local records management officers at all sites throughout the agency. In accordance with this regulation, these records management officers must have appropriate status (grade and position) and sufficient time to devote to the program.</p>	<p>REGIONS: Individuals have been nominated for positions</p> <p>Positions to be brought into compliance with regulations</p> <p><i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: Individuals have been nominated for positions</p> <p>Positions to be brought into compliance with regulations</p> <p><i>All labs must respond- See attached plans</i></p>	<p>FY 95</p> <p>FY 95</p>	<p>FY 92</p> <p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-5 After implementing recommendation 1-4, develop an active records liaison network to assist records management officers in administering the program by coordinating local records management activities.</p>	<p>OIRM has established a network to improve communications and coordination. Will be carried out in relation to recommendation 1-1.</p> <p>OIRM: See recommendation 1-1 for actual steps</p> <p>HEADQUARTERS: AA offices shall designate liaisons at office level</p> <p>AA offices shall designate liaisons at division level</p> <p><i>All programs must respond- See attached plans</i></p> <p>REGIONS: Regions shall designate liaisons at division level</p> <p>Regions shall designate liaisons at branch level</p> <p><i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond- See attached plans</i></p>	<p>1st QTR FY 93</p> <p>4th QTR FY 93</p> <p>1st QTR FY 93</p> <p>4th QTR FY 93</p>	<p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-6 In addition to continuing to make use of courses provided by NARA, carry out the current plans to develop and offer a formal series of records management training courses for all employees with records-related responsibilities including records management officers and liaisons at all levels as well as records custodians. The courses, which can be developed internally or on contract, should be given on a regular schedule both at headquarters and in the regions and should be tailored to meet the specific records maintenance and disposition issues faced by EPA headquarters, regional offices and other special facilities such as laboratories. The courses need to provide information about the management of non-textual material such as electronic and audiovisual records as well as textual records.</p>	<p>OIRM is implementing training plans</p> <p>OIRM: General course on records management fundamentals, and records retirement provided</p> <p>Course on file plans and filing to be developed</p> <p>Electronic records course to be developed</p> <p>Non-textual records course</p> <p>Training to be offered at Agency-wide conferences beginning FY 93</p>	<p></p> <p>2nd QTR FY 93</p> <p>2nd QTR FY 93</p> <p>2nd QTR FY 94</p> <p>3rd QTR FY 93</p>	<p>FY 91</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-7</p> <p>Implement a program of regular internal records and information evaluations as required by Chapter 1 of the Records Management Manual, paragraph 10c(1)c. Evaluations, broken down by offices, regions, and/or programs, should be done on a rotating basis, so that all major components are evaluated on a three to five year cycle. Staff knowledgeable about and involved in the creation and management of electronic and audio-visual records need to be included, as appropriate, on the evaluation teams. The evaluation process should include specific recommendations and mechanisms for follow-up to ensure that these recommendations are implemented.</p>	<p>Evaluation program will follow Chapter 1 Records Management Manual. To be completed over time in context of established responsibilities.</p> <p>Actions will be tied to other existing management reviews such as GSA Triennial Review and OMB Productivity Improvement Initiatives. Will be carried out in relation to recommendation 2-3.</p> <p>OIRM:</p> <p>Develop policy framework for evaluation</p> <p>Develop basic guidance for an evaluation program</p> <p>Test pilot program</p> <p>Begin regular cycle of evaluations</p> <p>HEADQUARTERS: <i>All programs must respond- See attached plans</i></p>	<p>FY 94</p> <p>4th QTR FY 92</p> <p>3rd QTR FY 93</p> <p>1st QTR FY 94</p> <p>3rd QTR FY 94</p>	

Recommendation and Action Matrix

[illegible]

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>1-8 Continue and expand the practice of offering records management briefings for all senior officials and program managers. The briefings should be offered in the field as well as headquarters. They should focus on the records responsibilities of managers, the legal requirements that records management programs are designed to meet, and the considerable benefits to the agency and to individual programs of effective and efficient records management.</p>	<p>OIRM and selected AAs, RAs, and Lab Directors have instituted ongoing briefings.</p> <p>OIRM: Eight Regions and Cincinnati briefed in 1991 and 1992</p> <p>Senior IRM Officials at HQ briefed in 1992; will continue</p> <p>Individual programs are being briefed on an ongoing basis about one every month</p> <p>HEADQUARTERS: Each program is to institute a program of regular management briefings <i>See attached plans</i></p> <p>REGIONS: Each office is to institute a program of regular management briefings <i>See attached plans</i></p> <p>LABORATORIES: Each unit is to institute a program of regular management briefings <i>See attached plans</i></p>	<p></p> <p></p> <p></p> <p></p> <p></p> <p>3rd QTR FY 93</p> <p>3rd QTR FY 93</p>	<p>FY 92 forward</p> <p>FY 92</p> <p>FY 92 forward</p> <p>FY 92 forward</p> <p></p> <p></p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
2. RECORDS CREATION AND MAINTENANCE			
<p>2-1 Develop at headquarters and disseminate throughout the agency basic recordkeeping requirements for EPA. These requirements should incorporate the guidance provided by NARA, modified for the specific needs and situation in EPA. The guidance should cover the following areas:</p> <p>a. specific instructions on the management of special records. (NARA guidance for audiovisual records is found at 36 CFR Part 1232; for micrographics at Part 1230 and for electronic records at Part 1234.)</p> <p>b. a fuller explication of the definition of record and of non-record material, along with guidance on applying these definitions within EPA. (NARA guidance on identifying Federal records is found at 36 CFR 1222.34.)</p> <p>c. instructions on identifying personal papers, directed specifically toward senior agency officials and scientists and other researchers. (NARA guidance on identifying personal papers is found at 1222.36.)</p>	<p>OIRM to revise Record Management Manual. Will be carried out in relation to recommendations 2-7, 5-1 and 5-4.</p> <p>OIRM: OIRM newsletter, INFO ACCESS, contains issues on special records</p> <p>Draft completed FY 92; review in process</p> <p>Fuller guidance to be issued</p> <p>Devoted issue of INFO ACCESS newsletter to personal papers</p> <p>Will issue basic policy statement on personal papers</p> <p>Will use materials currently being drafted by NARA and modify to meet Agency needs</p> <p>Headquarters, Regions and Labs to disseminate information within 6 months of receipt</p>	<p>FY 93-94</p> <p>3rd QTR FY 93</p> <p>FY 94</p> <p>1st QTR FY 93</p> <p>3rd QTR FY 93</p>	<p>FY 92</p> <p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-2 Based on the recordkeeping requirements in place for the Superfund program, develop recordkeeping requirements for other EPA programs and record systems to ensure adequate documentation for both immediate and longer term purposes. The first priority should be ensuring that creation and maintenance of records that protect the financial, legal, and other rights of the Government and of persons directly affected by its actions.</p>	<p>AAs, RAs, and Lab Directors to issue guidance. To be completed over time. Will be carried out in relation to recommendation 5-1.</p> <p>OIRM: Will meet with NARA to obtain guidance on recordkeeping requirements</p> <p>Will issue guidance on developing recordkeeping requirements</p> <p>Will develop a basic list of series warranting requirements</p> <p>HEADQUARTERS: Programs to identify appropriate records series and then establish timeframe for accomplishment.</p> <p>Programs to develop requirements</p> <p><i>All programs must respond- See attached plans</i></p>	<p>FY 93 forward</p> <p>4th QTR FY 92</p> <p>1st QTR FY 93</p> <p>3rd QTR FY 93</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-2 cont.</p> <p>Based on the recordkeeping requirements in place for the Superfund program, develop recordkeeping requirements for other EPA programs and record systems to ensure adequate documentation for both immediate and longer term purposes. The first priority should be ensuring that creation and maintenance of records that protect the financial, legal, and other rights of the Government and of persons directly affected by its actions.</p>	<p>REGIONS:</p> <p><i>All regions must respond- See attached plans</i></p> <p>LABORATORIES:</p> <p><i>All labs must respond- See attached plans</i></p>		

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-3 As part of EPA's internal evaluation program, use these recordkeeping requirements as a tool for monitoring mission critical programs to ensure that all necessary records are created, and that they are properly controlled and protected.</p>	<p>AAs, RAs, and Lab Directors to monitor mission critical programs through evaluation. To be completed over time. Can be carried out in relation to recommendation 1-7.</p>	<p>FY 93 forward</p>	
	<p>HEADQUARTERS:</p> <p><i>Programs will comply See attached plans</i></p>	<p>FY 94</p>	
	<p>REGIONS:</p> <p><i>Regions will comply See attached plans</i></p>	<p>FY 94</p>	
	<p>LABORATORIES:</p> <p><i>Labs will comply See attached plans</i></p>	<p>FY 94</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-4 Review agency case filing procedures. Begin with a single category of case file, for example, permit files. Determine how the various types of permit files are maintained in each region. Based on this review, develop and enforce uniform procedures for creating and maintaining the various categories and types of case files.</p>	<p>AAs, RAs, and Lab Directors to improve operational performance. To be completed over time.</p> <p>OIRM: In conjunction with programs, will determine whether procedures should be developed on an Agency-wide or on a program-by-program basis</p> <p>HEADQUARTERS: Programs should identify appropriate files and then establish timeframe for accomplishment</p> <p><i>See attached plans</i></p> <p>REGIONS: Regions should identify appropriate files and then establish timeframe for accomplishment</p> <p><i>See attached plans</i></p> <p>LABORATORIES: Labs should identify appropriate files and then establish timeframe for accomplishment</p> <p><i>See attached plans</i></p>	<p>FY 93 onward</p> <p>1st QTR FY 93</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-5</p> <p>Amend current agency policy on the subject file classification system for administrative records to make its use mandatory. Update the system as necessary to include all administrative records created and maintained by the Agency.</p>	<p>OIRM to issue guidance. Actions taken should assure proper disposition of duplicate records and promote HQ move.</p> <p>OIRM: Will make decision on adequacy of system as it now stands</p> <p>Revise system as needed</p> <p>Issue decision as Agency policy</p>	<p>FY 93-94</p> <p>1st QTR FY 93</p> <p>3rd QTR FY 93</p> <p>3rd QTR FY 94</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-6 Inform all program offices of the requirements to establish standardized file stations for the filing of official records, and to designate file custodians who are responsible for the operation of the file stations (Chapter 7, paragraphs 2 and 3, Records Management Manual). Inform all employees that under no circumstances are agency records to be taken home or similarly filed outside of approved agency storage space.</p>	<p>OIRM to communicate policy and requirements more clearly.</p> <p>OIRM: Communications will be made through INFO ACCESS newsletter</p> <p>Requirements will be included in Records Management Manual revision</p> <p>OIRM to issue policy directives and guidance clarifying filing requirements and roles and responsibilities; to be implemented by Headquarters, Regional and Laboratory offices</p> <p>Interim guidance to be issued</p> <p>Policy directive to be issued</p>	<p>FY 94</p> <p>4th QTR FY 92</p> <p>FY 93-94</p> <p>FY 93</p> <p>1st QTR FY 93</p> <p>1st QTR FY 94</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-6 cont. Inform all program offices of the requirements to establish standardized file stations for the filing of official records, and to designate file custodians who are responsible for the operation of the file stations (Chapter 7, paragraphs 2 and 3, Records Management Manual). Inform all employees that under no circumstances are agency records to be taken home or similarly filed outside of approved agency storage space.</p>	<p>HEADQUARTERS:</p> <p><i>Programs will comply- See attached plans</i></p> <p>REGIONS:</p> <p><i>Regions will comply- See attached plans</i></p> <p>LABORATORIES:</p> <p><i>Labs will comply- See attached plans</i></p>		

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-7 Eliminate personal filing systems for agency records and generally discontinue the practice of maintaining excessive duplicate records merely for convenience.</p>	<p>AAs, RAs, and Lab Directors to improve operational performance. Actions to precede HQ move in FY 95. Will be carried out in relation to recommendation 2-1.</p> <p>OIRM: Determine whether additional policy or procedures are needed</p> <p>OIRM to issue policy directives and guidance clarifying filing requirements and roles and responsibilities; to be implemented by Headquarters, Regional and Laboratory offices</p> <p>Interim guidance to be issued</p> <p>Policy directive to be issued</p> <p>HEADQUARTERS: <i>Programs must respond- See attached plans</i></p> <p>REGIONS: <i>Regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>Labs must respond- See attached plans</i></p>	<p>FY 93-94</p> <p>4th QTR FY 92</p> <p>FY 93</p> <p>1st QTR FY 93</p> <p>1st QTR FY 94</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
2-8 Implement appropriate file cut-offs to keep files at a manageable level. Ensure that both headquarters and field offices receive and implement guidance on proper filing techniques, including separately filing permanent and temporary records series and not intermixing non-record material such as reference works and vendor brochures, with agency files.	<p>AAs, RAs, and Lab Directors to communicate policy and requirements more clearly.</p> <p>OIRM: Guidance issued in Model Regional Records Management Manual</p> <p>OIRM to issue policy directives clarifying filing requirements and roles and responsibilities; to be implemented by Headquarters, Regional and Laboratory offices</p> <p>Interim guidance to be issued</p> <p>Policy directive to be issued</p> <p>HEADQUARTERS: <i>Programs must respond- See attached plans</i></p> <p>REGIONS: <i>Regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>Labs must respond- See attached plans</i></p>	<p>FY 94 forward</p> <p>FY 93</p> <p>1st QTR FY 93</p> <p>1st QTR FY 94</p>	FY 92

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-9 Examine agency policy regarding use of commercial storage space and the general problem of interim storage of records to ensure maximum use of the FRCs, which provide storage to EPA at no cost. Better controls agency-wide along with a more rigorous enforcement of agency files management and disposition procedures may eliminate the need for some of this space and save the agency money. Transferring permanent records as soon as possible to FRCs is an important means of protecting them and ensuring their long-term protection.</p>	OIRM to issue policy and guidance. Will be carried out in relation to recommendation 4-4.	FY 93	
	OIRM: Programs will be encouraged to use FRC storage	FY 92	
	Brochures issued which explain how to use the FRC		FY 92
	Examine policy as part of Records Policy Review	FY 93	
	OIRM to issue policy directives and guidance on the use of FRCs and related roles and responsibilities; to be implemented by Headquarters, Regional and Laboratory offices	FY 93	
	Interim guidance to be issued	1st QTR FY 93	
	Policy directive to be issued	1st QTR FY 94	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-9 cont. Examine agency policy regarding use of commercial storage space and the general problem of interim storage of records to ensure maximum use of the FRCs, which provide storage to EPA at no cost. Better controls agency-wide along with a more rigorous enforcement of agency files management and disposition procedures may eliminate the need for some of this space and save the agency money. Transferring permanent records as soon as possible to FRCs is an important means of protecting them and ensuring their long-term protection.</p>	<p>HEADQUARTERS: Training on retiring records instuted at Headquarters <i>Programs must comply- See attached plans</i></p> <p>REGIONS: <i>Regions must comply- See attached plans</i></p> <p>LABORATORIES: <i>Labs must comply- See attached plans</i></p>		FY 92

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>2-10 Implement fully the instructions of Chapter 4 of the Records Management Manual to develop and maintain an agency-wide program for the protection of vital records. Steps to be taken include:</p> <p>a. identify the records that fall under the two categories of vital records. Keep the volume of records at a manageable level.</p> <p>b. determine the appropriate storage sites, and consider the use of Federal Records Centers. Emergency operating records need to be available as needed or in the vicinity of emergency operating centers; rights and interest records require protection but do not have to be near these emergency centers.</p> <p>c. review the program annually. It should be simple and concise and avoid, in so far as possible, complex procedures. The plan should take into account that during an emergency those who use the records may not be the same as those who refer to them under normal circumstances.</p>	<p>AAs, RAs, and Lab Directors to improve vital records program as indicated in the Records Management Manual.</p> <p>OIRM: Review and revise as needed, Headquarters guidance on storage of vital records</p> <p>Will provide guidance to programs on identifying vital records</p> <p>HEADQUARTERS: Must conduct record retirement procedures and categorize vital records <i>All programs must respond- See attached plans</i></p> <p>REGIONS: Must conduct record retirement procedures and categorize vital records <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: Must conduct record retirement procedures and categorize vital records <i>All labs must respond- See attached plans</i></p>	<p>FY 93-95</p> <p>1st QTR FY 94</p> <p>4th QTR FY 93</p> <p>FY 94 forward</p> <p>FY 94 forward</p> <p>FY 94 forward</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
3. RECORDS DISPOSITION			
<p>3-1 Inventory of all EPA program office records, as required by 36 CFR §1228.12(a), and revise the Records Schedules in order to provide complete coverage for all records created and maintained by the agency. Headquarters and field records managers need to cooperate in this effort. Specifically identify in the records schedules the program office or function having custodial responsibility for the records, particularly for permanent series.</p>	<p>AAs, RAs, and Lab Directors to improve schedules over time. Will be carried out in relation to recommendation 3-3 and 4-4.</p> <p>OIRM: Memo to be drafted, requiring the scheduling of Headquarters records</p> <p>Memo to be drafted, requiring the scheduling of laboratory records</p> <p>Memo to be drafted, requiring the scheduling of field office records</p> <p>100 schedule items revised</p> <p>Complete internal review and submit to NARA</p> <p>HEADQUARTERS: Inventories will be conducted in each program</p> <p>Inventory begun in Superfund FY 92</p> <p>Inventory begun in RCRA FY 92</p> <p><i>All programs must respond- See attached plans</i></p>	<p>FY 93-95</p> <p>1st QTR FY 93</p> <p>2nd QTR FY 93</p> <p>3rd QTR FY 93</p> <p>2nd QTR FY 93</p> <p>FY 93</p> <p>FY 93</p>	<p>3rd QTR 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>3-1 cont. Inventory of all EPA program office records, as required by 36 CFR §1228.12(a), and revise the Records Schedules in order to provide complete coverage for all records created and maintained by the agency. Headquarters and field records managers need to cooperate in this effort. Specifically identify in the records schedules the program office or function having custodial responsibility for the records, particularly for permanent series.</p>	<p>REGIONS: Inventories will be conducted in each program</p> <p>Inventory begun in Superfund in Regions, FY 91</p> <p>Overall inventory begun in Regions FY 92</p> <p>Draft schedules to be completed</p> <p>Internal review completed and sent to NARA</p> <p><i>All regions must respond- See attached plans</i></p> <p>LABORATORIES:</p> <p><i>All labs must respond- See attached plans</i></p>	<p>2nd QTR FY 93</p> <p>1st QTR FY 93</p> <p>3rd QTR FY 93</p>	<p>2nd QTR FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>3-2 Organize these revised schedules into a format that serves as a comprehensive records manual. It should allow clear and easy access to disposition information and be easy for program offices to interpret and apply. The manual should include indexes - alphabetically, functionally, and by name or form for example - to simplify its use. The complexity of EPA schedules and the need for them to be widely and easily available throughout the agency to a variety of uses strongly suggests the use of automated techniques for maintaining and disseminating schedule information.</p>	OIRM is establishing an automated records disposition program to facilitate development, revision and management of schedules. Selected implementation of pilot has begun.	FY 95	
	OIRM: Format is prepared and mission needs analysis is completed	FY 92	
	Distribution methods are in place	FY 92	
	Schedule organization completed and approved by NARA	FY 92	
	Schedule format reviewed by Agency-wide officers		FY 92
	Begin adding schedules in manual format as completed	FY 92 forward	
	Determine appropriate automated format and system to be used	2nd QTR FY 93	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>3-3 Review the revised Records Schedules annually to ensure that they are kept current, accurately reflect program office needs, and meet all statutory requirements. Both headquarters and the regions need to be closely involved in this review process.</p>	<p>AAs, RAs, and Lab Directors to improve operational performance. Conducted in conjunction with recommendation 3-1.</p> <p>OIRM: Guidance has been issued for regions</p> <p>Guidance to be issued at Headquarters</p> <p>Clarifications issued by OIRM to be implemented by Headquarters, Regional and Laboratory offices</p> <p>Determine best procedure for implementing annual review at Agency-wide meeting</p> <p>HEADQUARTERS: <i>All programs must respond- See attached plans</i></p> <p>REGIONS: <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond- See attached plans</i></p>	<p>FY 93 ongoing</p> <p>1st QTR FY 93</p> <p>FY 93</p> <p>3rd QTR FY 93</p>	<p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>3-4</p> <p>Once accurate and usable schedules are in place, conduct an agency-wide campaign to apply these schedules to the large volume of records currently in EPA custody. In the tradition of agency clean-up campaigns, dispose of records in EPA office space no longer needed or transfer them to a Federal Records Centers. Unlike some of these previous campaigns, this must be done in accordance with approved authorities. Similarly, review the records in commercial storage space to identify those that can either be destroyed or moved into Federal Record Centers, as discussed in Chapter 2. Carefully identify and segregate permanent materials wherever located and transfer those no longer needed for current business to NARA.</p>	<p>AAs, RAs, and Lab Directors to communicate policy and requirements more clearly and to establish operational priorities for disposition of records on a routine basis.</p> <p>OIRM: Need basic directive on storing records</p> <p>OIRM to issue policy directive and guidance clarifying procedures for updating schedules; to be implemented by Headquarters, Regional and Laboratory offices</p> <p>HEADQUARTERS: Interim clean-ups are being conducted as programs move</p> <p>Systematic procedure will be in place following the inventory</p> <p><i>All programs must respond- See attached plans</i></p> <p>REGIONS: <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond- See attached plans</i></p>	<p>FY 95</p> <p>1st QTR FY 93</p> <p>FY 93</p> <p>ongoing through HQ move</p> <p>FY 95 forward</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>3-5 Inform all employees that to dispose of agency records in any manner inconsistent with the agency Records Schedules or the General Records Schedules is a violation of agency policy and Federal law.</p>	<p>AAs, RAs, and Lab Directors to communicate policy and requirements more clearly.</p> <p>OIRM: OIRM/OARM to issue memo informing employees and records management responsibilities</p> <p>Will issue information to employees and records managers on an on-going basis through newsletters, brochures, and other publications</p> <p>HEADQUARTERS:</p> <p><i>All programs must respond- See attached plans</i></p> <p>REGIONS:</p> <p><i>All regions must respond- See attached plans</i></p> <p>LABORATORIES:</p> <p><i>All labs must respond- See attached plans</i></p>	<p>FY 93</p> <p>1st QTR FY 93</p> <p>begin FY 92, continue in FY 93</p>	

Recommendation and Action Matrix

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Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
4. SPECIAL RECORDS			
<p>4-1 Re-examine the agency's Record Schedules as they relate to Superfund records.</p> <p>a. Distinguish between the Administrative Record and the NPL Site Files. Both need long term retention, but only one may actually be a permanent record to be eventually transferred to the custody of the National Archives.</p> <p>b. Review the dispositions of all Superfund related records. The paper generated by this program is voluminous and it may be possible that some of it does not merit permanent or prolonged temporary retention.</p>	<p>OSWER to continue improvements in operational performance.</p> <p>OIRM: Complete internal review of Headquarters and regional schedules</p> <p>Completed schedules will be referred to NARA for approval once internal review is finished</p> <p>OIRM to assist OSWER as necessary in determining records value</p> <p>OIRM/OSWER completed guidance on identifying OSWER records</p> <p>HEADQUARTERS: Headquarters Superfund records examination in process <i>All programs must respond- See attached plans</i></p> <p>REGIONS: Regional Superfund records schedule examination completed <i>All regions must respond- See attached plans</i></p>	<p>FY 93</p> <p>1st QTR FY 93</p> <p>3rd QTR FY 93</p> <p>ongoing</p> <p>4th QTR FY 92</p>	<p></p> <p></p> <p></p> <p></p> <p>FY 92</p> <p></p> <p>FY 92</p>

Recommendation and Action Matrix

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Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>4-3 Develop more rigorous case file requirements for the NPL site file to ensure that only one copy of all appropriate documents and reports is included in the file.</p>	<p>OSWER to continue improvements in operational performance.</p> <p>OIRM: OIRM to work with OSWER to develop more rigorous case filing requirements that conform to Federal records management regulations</p> <p>OSWER: <i>See attached plans</i></p>	<p>FY 92 forward</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>4-4 Inspect all facilities housing Superfund site files. Upgrade them as necessary to meet the facility standards of 36 CFR §1228.222. To prevent deterioration, permanent paper records that will be retained for long periods of time in agency storage need to be maintained in environmentally controlled areas. Special protection must also be provided for any audiovisual or microfilm records. (For NARA regulations in these areas, see recommendation 3-1a.)</p>	<p>OSWER to improve operational performance. Will be carried out in relation to recommendations 3-1 and 2-9.</p> <p>OIRM: OIRM to work with OSWER when inspecting facilities housing Superfund site files</p> <p>OSWER: <i>See attached plans</i></p>	<p>FY 92 forward</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>4-5 Increase EPA records staff oversight of the Superfund records management program to ensure consistency in and better assess contractor performance, as well as to help guarantee program continuity.</p>	<p>OSWER to continue to ensure adherence to Agency guidelines for contractor performance.</p> <p>OSWER:</p> <p><i>See attached plans</i></p>		

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>4-6 Develop an agencywide strategy that establishes oversight for records created or maintained by contractors on behalf of the agency by involving records management personnel in the contracting process whenever program documentation is a deliverable item or the contract is for records management.</p> <p>a. Identify and impose specific contractor requirements for the creation, maintenance and use, and disposition of records.</p> <p>b. Include standard language in all contracts that specifically identifies document contents for programs in which contractors produce agency records.</p> <p>c. As part of the agency internal evaluation program, monitor contractor recordkeeping practices to ensure compliance with agency and Federal Regulations.</p> <p>d. Inspect contractor-run storage facilities periodically to ensure conformance with the facility standards of 36 CFR § 1228.222. Upgrade the facilities as necessary.</p>	<p>OARM to issue guidance.</p> <p>OIRM: Pilot study will be commenced with OWPE and OSWER/IMS</p> <p>Proposed solution will be reached; process begun 3rd QTR 92</p> <p>Solution will be implemented</p> <p>Expand solution for Superfund to Agency-wide programs</p> <p>HEADQUARTERS: <i>All programs must respond- See attached plans</i></p> <p>REGIONS: <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond- See attached plans</i></p>	<p>FY 93-94</p> <p>FY 92</p> <p>2nd QTR FY 93</p> <p>FY 94</p> <p>FY 94 forward</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
5. ELECTRONIC AND NONTEXTUAL RECORDS			
<p>5-1 Revise and expand the guidance for creation, maintenance and use, and disposition of electronic records already in place to make it more complete and current. In particular, incorporate, as appropriate and in a form applicable to EPA, the guidance in NARA's regulations on electronic recordkeeping, found at 36 CFR 1234, and in NARA's handbook on Managing Electronic Records. Ensure that records maintained on all types of systems - microcomputers, local area networks, minicomputers, and main-frame computers - are included. As part of the EPA directive system, this guidance should be disseminated to all records managers and administrators and IRM staff, both in headquarters and the field. Clear assignment of responsibility for developing and maintaining documentation for electronic records should be included in the directive.</p>	<p>OIRM to issue Model Records Management Operating Procedures and to revise the Records Management Manual. Will be carried out in relation to recommendation 2-1, 2-2, and 5-2.</p> <p>OIRM: Issued Model Records Management Guidance</p> <p>Initiated review of all Agency policy including electronic records to determine policy needs</p> <p>Distributed 36 CFR 1234 to all programs</p> <p>April issue of INFO ACCESS newsletter discussed 36 CFR 1234 and other issues</p> <p>OIRM to develop EPA specific electronic records policy in conjunction with NDPD</p> <p>OIRM/NDPD to circulate policy for review</p>	<p>FY 94</p> <p>3rd QTR FY 93</p> <p>1st QTR FY 94</p>	<p>FY 92</p> <p>FY 92</p> <p>FY 92</p> <p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>5-1</p> <p>Revise and expand the guidance for creation, maintenance and use, and disposition of electronic records already in place to make it more complete and current. In particular, incorporate, as appropriate and in a form applicable to EPA, the guidance in NARA's regulations on electronic recordkeeping, found at 36 CFR 1234, and in NARA's handbook on Managing Electronic Records. Ensure that records maintained on all types of systems - microcomputers, local area networks, minicomputers, and main-frame computers - are included. As part of the EPA directive system, this guidance should be disseminated to all records managers and administrators and IRM staff, both in headquarters and the field. Clear assignment of responsibility for developing and maintaining documentation for electronic records should be included in the directive.</p>	<p>OIRM cont. OIRM to issue policy directives and guidance clarifying procedures for electronic records life cycle, and related roles; to be implemented by Headquarters, Regional and Laboratory offices</p> <p>HEADQUARTERS: <i>All programs must respond- See attached plans</i></p> <p>REGIONS: <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond- See attached plans</i></p>	<p>FY 93</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>5-2 Take the following steps to improve the disposition of electronic records:</p> <p>a. Develop a comprehensive and up-to-date inventory of all electronic records and systems of records, using the Information Systems Inventory as a starting point. The inventory should include information about the documentation for electronic records.</p> <p>b. As the first step in scheduling the unscheduled electronic information, identify what is potentially permanent or requires long-term retention and formally schedule the disposition. It may be appropriate, in determining permanent retention, to focus on specific types of information and data segments, rather than specific datafiles or even databases. Once permanent and long-term retention electronic records have been scheduled, schedule those program records not covered by the General Records Schedule.</p>	<p>OARM, AAs, RAs, and Lab Directors to improve operational performance over time.</p> <p>OIRM: OIRM to work with programs to schedule all unscheduled data series in ISI during FY 93-94</p> <p>Programs are to cooperate in providing information</p> <p>OIRM will schedule those records highlighted in NAPA II report</p> <p>OIRM will schedule the remaining electronic systems program-by-program in conjunction with scheduling of textual files</p> <p>OIRM to schedule regionally based systems following completion of Headquarters systems</p>	<p>FY 95</p> <p>FY 94</p> <p>1st QTR FY 93</p> <p>2nd QTR FY 93 forward</p> <p>FY 94</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>5-2</p> <p>c. For those electronic records already scheduled as permanent, primarily older series created on mainframes, determine their current status and identify the corresponding documentation. One approach would involve working backwards from data stored at NCC in Research Triangle Park, identifying what corresponds to the scheduled items and going to the users responsible for the data to locate documentation.</p> <p>d. Involve the expanded headquarters records management staff in the planning of new electronic records systems or when existing systems are modified in order to ensure that appropriate records maintenance and disposition procedures are built in at the earliest stages. The involvement of records managers in the system design will not only ensure that records management requirements are met; it will also result in a more efficient and effective system.</p> <p>e. Based on clearly assigned responsibilities, ensure that all necessary and appropriate documentation for electronic records is created and maintained according to NARA and EPA requirements. As part of the evaluation program, regularly review this documentation, with particular attention to those systems requiring permanent or long-term retention.</p>	<p>OIRM cont. Programs have started process for related data files</p> <p>OARM will notify custodians who will carry out objectives</p> <p>NDPD has issued guidance on "archiving" data which requires scheduling of all data stored off-line at RTP</p> <p>OIRM working to establish records management check-off list as part of project to revise life cycle guidance. Records Manager is part of work group.</p> <p>Implementation will follow assignment of responsibilities (Also see response to recommendation 5-1)</p> <p>HEADQUARTERS: <i>All programs must respond- See attached plans</i></p> <p>REGIONS: <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond See attached plans</i></p>	<p>ongoing, beginning in FY 92 through FY 95</p> <p>FY 94</p>	<p>FY 92</p>

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>5-3 Include segments on managing electronic records in agency records management training sessions. In addition, develop presentations for IRM officials and program staff responsible for electronic records systems that provide information on their responsibilities in relationship to electronic records, particularly in terms of building in maintenance and disposition at the system development phase, and of creating and maintaining appropriate documentation.</p>	<p>OIRM to communicate policy and requirements more clearly.</p>	<p>FY 93 onward</p>	
	<p>OIRM: Will develop a half day training session on electronic records management to be included in Agency training cycle</p>	<p>FY 93</p>	
	<p>Will produce special issue of INFO ACCESS newsletter to communicate responsibilities to major IRM officials, system managers, and records staff</p>	<p>Apr-92</p>	
	<p>Will determine best method of communicating information to IRM officials and program staff</p>	<p>FY 92</p>	
	<p>Will to develop products to communicate message</p>	<p>FY 93</p>	
	<p>HEADQUARTERS: <i>All programs must respond- See attached plans</i></p> <p>REGIONS: <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond See attached plans</i></p>		

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
5-4	<p>Issue and implement a policy affirming the disposability of paper records once they have been microfilmed and verified according to appropriate EPA and NARA specifications. Permanent records must be filmed according to the standards in 36 CFR 1232.</p>	<p>1st QTR FY 93</p>	
	<p>OIRM: OIRM to issue policy; programs to respond on implementation</p>		
	<p>OIRM to issue memo on disposability</p>	<p>2nd QTR FY 93</p>	
	<p>OIRM to include disposability of paper after microfilming in revised records management manual</p>	<p>4th QTR FY 93</p>	
	<p>HEADQUARTERS:</p>		
	<p><i>All programs must respond- See attached plans</i></p>		
	<p>REGIONS:</p>		
	<p><i>All regions must respond- See attached plans</i></p>		
	<p>LABORATORIES:</p>		
	<p><i>All labs must respond- See attached plans</i></p>		

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>5-5 Inventory audiovisual records in the custody of EPA with a special emphasis on locating all series of permanent records. Establish specific dispositons for the series identified. Records that are at least ten years old should be reviewed for transfer to the Archives as soon as possible. Guidance for identifying permanent as opposed to temporary audiovisual records can be found in NARA's handbook Managing Audiovisual Records.</p>	<p>OCEPA to improve operational performance.</p> <p>OIRM: OIRM to support OCEPA in inventorying audiovisual records</p> <p>OIRM to develop revised draft schedules to cover all audio-visual records</p> <p>HEADQUARTERS:</p> <p><i>All programs must respond- See attached plans</i></p> <p>REGIONS:</p> <p><i>All regions must respond- See attached plans</i></p> <p>LABORATORIES:</p> <p><i>All labs must respond- See attached plans</i></p>	<p>FY 93</p> <p>3rd QTR FY 93</p>	

Recommendation and Action Matrix

Recommendation	Actions for Improvement	Planned Completed	Actual Completed
<p>5-6 Develop a program for managing audiovisual records, based on implementing the guidance established by EPA as described in recommendation 2-1a. Once older permanent audiovisual records have been transferred to the National Archives, the agency priority should be establishing appropriate storage and environmental controls for the permanent records remaining in EPA custody in order to ensure their long-term preservation, and implementing a program of regular transfers. An evaluation of audiovisual records management across the Federal government and specific recommendations for improving these programs can be found in NARA's recently published The Management of Audiovisual Records in Federal Agencies: A General Report.</p>	<p>OCEPA to improve program management.</p> <p>OIRM: OIRM to cooperate with OCEPA in developing program</p> <p>HEADQUARTERS: <i>All programs must respond- See attached plans</i></p> <p>REGIONS: <i>All regions must respond- See attached plans</i></p> <p>LABORATORIES: <i>All labs must respond- See attached plans</i></p>	FY 93-94	