ESTABLISHING AND MANAGING

A RECORDS MANAGEMENT PROGRAM

OSWER IMS

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BOOZ•ALLEN & HAMILTON Inc.

What is the Purpose of This Brochure?

This brochure is the first in a series designed to provide each Office of Solid Waste and Emergency Response (OSWER) Headquarters and Regional program office with a framework for establishing and managing a Records Management Program. This brochure is neither a policy directive nor mandatory guidance. It provides practical and useful information to all levels of program managers and staff who are trying to gain control over their records.

The information is presented in a question and answer format organized in four sections: *Introduction, Records Management Overview, Program Management Activities,* and *Records System Phases.*

This brochure also includes a flowchart of the Program/Systems Relationship, a list of useful resource materials, and checklists of critical Records Management Program (referred to as "Program") activities and Records System (referred to as "System") activities.

Who Will Benefit From Reading This Brochure?

Those most likely to benefit are waste management program managers and staff trying to cope with records management problems: specifically:

- *Managers who need to gain control over program records* to improve the efficiency and effectiveness of their operations.

- *Staff who want to learn techniques* to decrease the time they spend locating records needed to accomplish their day-to-day work, to answer requests for information, and to conduct special record-intensive tasks such as preparing for litigation.

What is Records Management?

Records Management is defined as: having the right information in the right form, in the hands of the right people when they need it, at the lowest possible cost. Records include, but are not limited to, files, maps, drawings, and photographs, and are stored on media such as paper, microfilm, computer disks, optical disks, and sound and video tapes. Records management provides a systematic approach to managing an organization's recorded information and establishes control over records from the time of their creation through retirement or disposition. This systematic approach and associated controls include such tasks as:

- *Organizing records according to uniform classification systems* and indexing records to ensure that users can retrieve records that match their search criteria.

- *Establishing circulation control procedures* to ensure the integrity of records collections.

- *Converting records to appropriate storage media,* such as optical disk or microform, to ensure that records are stored in a cost-effective manner.

- *Identifying vital records* and storing duplicates of them off-site to preserve the records that are necessary to restore operations in the event of a disaster.

- *Establishing special procedures for handling sensitive information* to protect these records against unauthorized disclosure.

- *Establishing records retention schedules* to ensure that an organization keeps only the information it needs, not everything it can. Inactive records can then be retired or destroyed on a routine basis.

What is a Records Management Program?

A Records Management Program is a framework to provide broad management control over an organization's records. A Records Management Program includes the same components as other Agency programs; it operates under authorities to fulfills functions. and it requires specific types and levels of resources. Within the overall Program, individual Records Systems are developed and implemented.

What Are the Sources of Administrative and Legal Records Management Requirements?

Records Management Programs are subject to a variety of mandatory legal and administrative requirements, both external and internal to the waste management programs. General requirements are found in:

- *Publications of the Office of Management and Budget (OMB), the General Services Administration (GSA), the National Archives and Records Administration (NARA), and the General Accounting Office (GAO).*

- *Resource Conservation and Recovery Act (RCRA) of 1976.*

- *Hazardous and Solid Waste Amendments (HSWA) of 1984.*

- *Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980.*

- *Superfund Amendments and Reauthorization Act (SARA) of 1986.*

In addition, requirements imposed by EPA are specified in five principal Agency documents:

- *Office of Information Resources Management (OIRM) Policy Manual 2100*

- *OIRM Records Management Manual 2160)*

- *OSWER System Life Cycle Management Guidance (Directive 9028.00)*

- *OSWER Model Program for Removal Site File Management (Directive 9360.2-01)*

- *EPA Records Control Schedules that define the retention period and disposition for the records in each EPA program.*

Most of the external records management requirements are addressed and interpreted in the EPA internal publications. listed above.

What is a Records System and What is its Relationship to a Records Management Program?

As stated earlier, a Records Management Program is a framework for controlling all records in the Headquarters or Regional program office where it is established. Within the overall Program framework, *individual Records Systems control specific collections of records.*

Each Records System governs a collection of records using a specific set of record handling procedures and additional tools (e.g., a data base that manages information about the records). Ideally, a Records System is defined broadly enough to include all interrelated records in the waste management program. (e.g., a Records System consisting of facility, site and incident records rather than a Records System consisting of only remedial site records). However, as a practical matter, in organizational structures, program priorities and the physical location of records may result in an organization defining several Records Systems, each consisting of a subset of records. (e.g. a Records System consisting of RCRA facility records and a Records System consisting of CERCLA remedial site records).

A Records System may or may not utilize computer-based technologies. It can be completely manual (e.g., using a paper medium, file folders and file cabinets, and a handwritten check-out sheet placed near the file cabinet for circulation control); fully automated (e.g., using an optical disk storage medium with a full text search and retrieval data base system); or somewhere in between (e.g., a data base system that manages information about records in a paper medium).

■ RECORDS MANAGEMENT OVERVIEW

W hy Establish a Records Management Program and its Individual Records Systems?

There are three general reasons for establishing a Records Management Program:

To promote efficiency in the waste management staff's retrieval of recorded information, e.g.,:

- Programs experience staff turnover and projects are reassigned. A filing system that everyone can understand and use will *reduce the time and frustration spent on trying to understand widely differing personal filing systems.*

- Congressional and Freedom of Information Act (FOIA) requests for information and public inquiries require prompt response. Program staff need quick access to records not under their immediate control. A Records System *establishes the location of records and, if needed, is designed to serve multiple users.*

- Technical staff are spending a significant amount of time on administrative functions. A Records Management Program will *reduce professional staff time spent on record handling functions.*

To ensure adequate and secure space for the storage of waste program records, e.g.,:

- Program records are voluminous and are increasing at an alarming rate. A Records System will *eliminate duplicate records and remove non-essential records from valuable office space.*

- Certain records are vital to the program (e.g., those relevant to cost recovery and litigation) can be lost or destroyed. A disaster recovery plan *ensures that a backup of vital records is available.*

- Certain records are required by law to be protected from unauthorized disclosure. Special procedures for identifying, storing and accessing sensitive information *reduce the risk of inadvertent disclosure.*

To guarantee compliance with relevant waste management and records management laws and regulations, e.g.,

- Program managers must comply with laws specific to the conduct of the waste management program. A Records System is designed so that *legislatively mandated requirements, such as compilation of the Administrative Record, are met* in a manner requiring minimal cost and staff time.

- Program managers must comply with laws and regulations specific to records management, such as the Paperwork Reduction Act of 1980. A Records Management Program *builds in the controls and procedures required to ensure compliance.*

What are the Levels of Management Responsibility?

Three levels of management involvement are necessary for a successful Records Management Program: Senior level waste management Program Management, mid-level Records Management Program Management, and Records System Specialists. Each of the three levels plays a distinct role with corresponding responsibilities for the management of the overall Program. However, a single individual can fill more than one of the three roles. Descriptions of the roles and responsibilities follow:

Headquarters/Regional Waste Management Division Manager (senior level)

Role: Overall Program goal setting and oversight

Responsibilities:

- *Sets and prioritizes objectives* of the Program.

- *Delegates authority* for management of the Program by appointing a mid-level Records Management Program Manager.

- *Reviews and approves the budget* developed by Records Management Program Manager and secures funding for the Program on an annual basis.

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- *Provides oversight* of the Program through establishing a periodic status update process: during this process, assesses whether the Records Management Program sufficiently supports waste management program goals and priorities.

- *Approves high-level Program policies* and cross-cutting resource allocations such as space and ADP support for the Program.

Records Management Program Manager (mid-level)

Role: Day-to-day management of the Program and reporting on status to senior level management.

Responsibilities:

- *Analyzes overall Program requirements* to meet established objectives.

- *Defines overall Program policies* that will guide Program Execution and Review.

- *Assesses the need* for individual Records Systems.

- *Develops a proposed budget* for the Program, including the individual Records Systems.

- *Delegates authority* for managing approved individual Records Systems to Records Systems Supervisor(s).

- *Sets the schedule* for Execution of the Program and the development and implementation of its Records Systems.

- *Provides program-wide technical direction* and oversight to Records System Supervisors on cross-cutting issues such as the use of technology.

- *Approves individual Records System procedures* and technology investments.

Records System Supervisors

Role: Management of the life cycle of the Records System.

Responsibilities:

- *Establishes a Records System* through overseeing the phases of the System's life cycle.

- *Provides input into budgeting and scheduling* processes and maintains the budget and schedule set by the Records Management Program Manager.

- *Supervises* the Records System staff

- *Briefs the Records Management Program Manager* on the progress of the Records System and on Systems concerns/crosscutting issues, such as Records System procedures and investigation of records management technologies.

How Can Contractor Support be Used?

Often, EPA staff resources may be insufficient to implement a Records Management Program. In such cases, contractor support may be used to:

- *Supplement the contribution of waste management program staff members* who may not have sufficient time available to fully plan and define the Records Management Program.

- *Augment the skills available internally* with specialized expertise in Records System development and implementation functions. Specialized skills my be necessary to perform tasks such as Records System requirements analyses, user surveys, file structure design, and implementation support.

- *Provide the Headquarters or Regional program office with long-term support* for the operation and maintenance of individual Records Systems.

While contractor resources can be extremely valuable. managers must carefully plan for maximum utilization. For example, *procurement of contractor support is typically a time consuming process*: thus it is desirable that the senior level program management determine the initial need for contractor support as early as possible. After the initial need is identified. management should have staff develop a Statement of Work (SOW) clearly defining the tasks and products expected of the contractor.

The timing of contractor support also merits careful consideration. *Contractor support is usually most effective during the Records Management Program Execution* to provide technical assistance on activities associated with individual Records Systems. Since budget restrictions typically constrain the extent to which contractor support may be applied. management should carefully assess internal capabilities in order to identify when outside assistance can be most beneficial. Management should reassess the need for contractor support on an ongoing basis during Program Execution and Review activities.

Finally, the selection of a specific contract vehicle can require research and coordination. Existing EPA contracts for records management-related services may be a viable procurement option. If no such contracts exist. a new procurement action may be required. *Procurement alternatives may be discussed with OSWER's Information Management Staff (OSWER IMS) and the Office of Information Resource Management (OIRM's) records management staff.*

What are Program Management Activities?

The Program Management Activities section presents the general activities associated with establishing a Records Management Program. These activities are:

- *Planning* — Defining Program goals and objectives, identifying requirements and preparing the Program Execution and Review Plan.

- *Execution* — Placing all of the Program resources into action, conducting and managing the Program on a routine basis.

- *Review* — Systematically examining the Program and recording benefits and shortcomings to ensure its continued effectiveness.

How does the Planning Process Begin?

Prior to initiating Program Planning, Headquarters or Regional management will set the agenda of the Records Management Program. Specifically:

- *Senior level management assigns responsibility* for the Planning, Execution and Review of the Records Management Program – typically to mid-level managers with waste management program support responsibilities.

- *Records Management Program Managers prepare a Program Planning Plan* that outlines the methodology, resources and schedule to be used in establishing the Program.

What are the Steps to Prepare a Program Plan?

To prepare a Program Plan. the Program Manager works with senior management to complete the following tasks and incorporate the results of each into the Program Plan:

- *Define the problem* - The first step in establishing a new program is to carefully define the problem needing a solution. This step usually involves management requesting input from staff at several levels.

- *Identify objectives and priorities* - As with any other program. management establishes and prioritizes the goals of the Program and communicates these priorities to the staff.

- *Develop policies* - Management defines policies that will clearly guide Program Execution and Review. From these policies. procedures for each Records System can be developed.

- *Analyze Program requirements* - Management assigns responsibility for researching legal and administrative requirements and for analyzing the internal organizational requirements of the Program.

- *Assess staffing requirements and assign responsibility* - Management determines roles and responsibilities required to establish and operate a Records Management Program and approves a staffing plan.

- *Establish the budget* - Management determines and secures a source of start-up funding for the Program. and develops and submits annual budgets to operate the Program and its individual Records Systems.

- *Set the schedule* - Management establishes the time frame for the Execution of the Program and the development and review of its Records Systems.

- *Provide oversight* - Management establishes a regular evaluation and monitoring process to assess whether the Records Management Program sufficiently supports waste management program goals and priorities.

How are the Program's Goals and Priorities Established?

Most offices have established means of identifying goals and priorities for programs. The following activities outline an approach to establishing the goals of a Records Management Program:

- *Identify the most significant short-term* (e.g., lack of security for existing records) and long-term problems (e.g., potentially incomplete documentation for future cost recovery actions).

- *Identify broad areas of increased organizational effectiveness and productivity that could be realized* if records were better controlled (e.g., less professional resources dedicated to answering FOIA requests).

- *Develop a list of goals* for achieving solutions to the identified problems and need for improved effectiveness (e.g., alleviate danger of record loss or damage).

- *Prioritize the list of goals* by considering the relative importance, difficulty and time frame projected for attaining each one.

What Types of Program Policies Should Be Set?

Based on the established goals and priorities and the identified Program requirements, management develops high-level policies. These policies establish overall standards for the Records Management Program. Their stated purpose may be to:

- *Ensure the program office's complete compliance* with applicable

laws and regulations.

- *Guarantee the protection of records* that are vital or important to the mission of the waste management program office.

- *Improve the efficiency of the waste management program* operation through the organization of the office's records.

Example policies may include:

- *Record Use* - A policy stating that the record copy of all programmatic records shall be maintained centrally

- *Record Protection* - A policy defining the different categories of sensitive information and stating that sensitive records shall be identified at their creation and protected through appropriate measures throughout their life cycle.

How are Records Management Program Requirements Determined?

A working group of representative waste management program staff may be formed to analyze Program requirements. The working group can be successfully supplemented by contractor support for this activity. The working group's efforts can include the following activities:

- *Perform broad reviews of legal and administrative requirements.* for example. esearch the requirements specified in the Agency guidance documents discussed earlier. OIRM and OSWER IMS can provide guidance on specific issues that arise.

- *Conduct a high level records inventory.* specifically. perform a general inventory of the waste management program office's records holdings. Relevant data includes: categories of records that exist and their location. format (e.g.. maps). physical condition. volume and rate of growth. sensitivity.

- *Establish user profiles* through conducting interviews with representative staff. In this way the working group can gain an understanding of the relationship of records to the information

and work flows of the waste management program and establishes the general needs of categories of staff (e.g.. Remedial Project Managers) who use records. Relevant tasks include identifying what records the staff use and how they use them. where the users are physically located in relation to each other and to the records. and whether or not the needs of any of the users are in conflict with each other.

* *Research information integration requirements* for existing systems. for example. by compiling a list of the existing information systems that may affect the need for and use of records. Any requirement for integration between these existing systems and the Records Management Program is identified.

What Types of Resources are Required for the Program?

Staff. space. equipment. and materials are necessary to implement a Records Management Program. Management cannot establish a firm budget on the Program level until it develops the individual Records Systems comprising the Program. However. management is able to define the type of resources that will be required and to allocate start-up Program funding. The types of resource needs to be considered are:

* *Staffing* - Skilled Records Management Program management and staff are necessary to manage the Program and to oversee the development and implementation of the individual Records Systems.

* *Space* - Space is necessary for managing and storing the records. The current and projected space availability directly influences the types of Records Systems that can be developed and how quickly they can be implemented.

* *Equipment/Materials* - Equipment such as file shelving. traditional file cabinets. record filming and scanning equipment. and computer hardware may be necessary. Supplies such as folders and labels are often used. The choice of records management equipment and materials is very much dependent

on the Records Systems that are developed.

- *Records Management Technologies* - Feasible technological alternatives to paper, such as microform and optical disk, appropriate computer software, and integrated record storage and retrieval systems are examples of the types of technologies that can assist in managing records. Specific technology choices are dependent on the results of analyses of Program requirements, individual Records Systems requirements, and the costs/benefits of feasible alternatives.

What is the Program Execution Plan?

The Program Execution Plan is a blue print for the Execution and Review of the Records Management Program, which includes the individual Records Systems within the Program. It is based on the information gathering and decision making that occurred during the Program Planning process. The plan:

- *Identifies the Records Systems* to be developed as part of the Program.

- *Defines a schedule* of the initial tasks and products that will be produced to develop the Records Systems.

- *Provides an initial assessment of the resources* required for the development of Records Systems.

- *Provides initial forecasting tools* for developing budget requests.

- *Outlines internal and external communication* and coordination links.

- *Provides the framework for periodic review* of the Records Systems.

The most effective Program Execution Plan also includes *details on the Program's goals and priorities, general policy guidelines and requirements.* These components of the plan provide a framework for developing each Records System. Management prioritizes the Records Systems to be developed, based on resource availability and the overall priorities of the waste management program.

What Is the Focus of Program Execution?

The primary focus of the Program Execution activity is the creation and management of the individual Records Systems included in the Program. *All five phases of a Records System's life cycle occur during the Execution of the Program.* Through the activities of the System life

cycle, the resources that were identified and acquired during Program Planning are utilized.

W hat Activities Are Included in Program Execution?

The Records Management Program is executed via a set of carefully planned activities:

- *Performing ongoing planning and budgeting.*

- *Providing initial staffing* for individual Records Systems.

- *Facilitating integration* among the different Records Systems.

- *Evaluating the overall performance* of individual Records Systems

- *Conducting assessments* of various technologies and planning for their utilization.

- *Establishing internal and external coordination* and communication.

- *Providing expert technical assistance,* either internally or through external consultants.

Why Is Program Review Useful?

After Records Systems have been functioning for a period of time. a regular assessment of overall Records Management Program performance should be made to determine whether:

- Overall Program *performance expectations are being met.*

- Original Program *goals and priorities continue to be applicable.*

- Individual *Systems need to be modified or integrated* based on changes in Program requirements.

- *Policies and procedures in force are effective* in providing Program direction.

- Additional records management *automation technologies can be cost-effectively employed.*

- *Resources allocated to the Program are adequate.*

- *Staffing levels and mix are appropriate* and effective.

- Actual Program *costs are within budgeted* amounts.

- Annual *budget requests accurately reflect Program requirements* and are being prepared in accordance with applicable Agency guidelines.
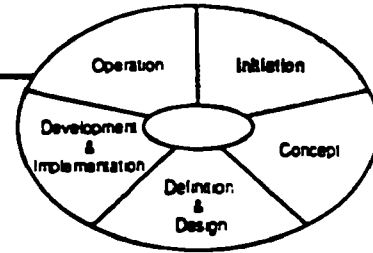
What are the Phases of the Life Cycle of a Records System?

The steps in creating a Records System parallel the phases and stages described in OSWER's System Life Cycle Management Guidance, Directive #9028.00. The Records System Supervisor oversees the following phases of activity:

- *Initiation* - Identify the records management problem.

- *Concept* - Analyze the problem to produce a high-level, comprehensive model of its solution.

- *Definition and Design* - Prepare detailed descriptions of the requirements of the Records System and a detailed System design that fulfills those requirements.

- *Development and Implementation* - Build and install the Records System.

- *Operation* (including Production, Evaluation and Archiving) Make the Records System fully available to the users and evaluate it, modify it and terminate it as necessary.

Many of the tasks associated with each phase can be successfully carried out using contractor support. Contractor activities should be evaluated against the overall goals, budget, and schedule of the Program Execution Plan.

How is a Records System Initiated?

A Records System is initiated through the preparation of a Project Plan. The Project Plan for the System serves the same function as the planning plan developed for the Program. It identifies a records management problem and describes the methodology and resources to be used to further the analyze the problem. *The purpose of the Initiation Phase is to identify the records management problem to be solved,* with a focus on the pertinent information, organizations experiencing the problem, timeframe available for establishing the solution, and overall value of the solution.
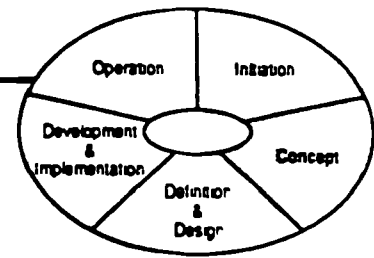
How is the Project Plan Put into Action in the Concept Phase?

The Concept Phase provides a high-level, comprehensive model of the solution to the records management problem. The following activities comprise the specific steps of the Concept Phase:

- *Conduct requirements analyses* to determine legal and administrative, user, functional and performance requirements.

- *Perform inventory of record collection holdings* to compute record volume, estimate record volume growth, classify the types of records, and estimate the degree of activity for each record type. The purpose of this information is to determine how categories of records are used, how they relate to each other, and how long they need to be maintained in accessible active and inactive storage.

- *Analyze Records System options,* including: centralization or decentralization; storage media (e.g., microfilm); use of technology; and type of space, staff, ADP support, equipment and resources that are necessary. The identification process includes cost/benefit analyses of each set of options that meet the requirements (e.g., one set of options may be a centralized records storage room for paper records with an accompanying data base system).

- *Choose the best Records System* based on the cost/benefit analyses of the feasible alternatives, and the goals and objectives of the overall Records Management Program.

tance of each type of record and deciding on the best method of preservation is the first step toward developing a disaster recovery plan during the Development and Implementation Phase.

- *Record Protection* - The Records System Supervisor defines the System capabilities necessary to prevent theft or intentional destruction of all records in the System. In addition, specialized requirements to protect categories of sensitive records (e.g.. enforcement sensitive) are also identified.

- *Record Retention and Disposition* - Operating. administrative. fiscal, legal and historical requirements all affect the length of time that records need to be retained. Each type of record within the Records System needs an individualized retention (i.e.. how long it should be kept) and disposition (i.e., when it can be archived or destroyed) schedule. The retention and disposition schedules have an impact on the System's cost because they affect the amount of active and inactive storage that the System requires. After the schedules are initially established. they are reviewed and updated periodically.

What Are the Components of the Records System Design?

The System Design is based on the overall Concept of the Records System, and reflects the resource and functional capabilities required by the System. The Design is of a picture of how the System will work. The primary components of the Records System design are:

- *File Structure* - Regardless of the level of automation chosen. the organization of the records is one of the most important elements of the System. The key to structuring the records is to consider how they will be used. Most record collections in the waste management programs are comprised of groups of records relating to specific activities (e.g.. in the RCRA program. the permitting activity creates different records than corrective

action activity). Since most of the records are used for activity-specific information, the file structure often mirrors these activities. Each major section of the file structure is subdivided into several functional categories (e.g., technical reports and correspondence). In some cases, these categories may be divided further depending on the volume and complexity of the records.

- *Procedures* - To ensure that the Records System fulfills all of the defined functional capabilities, the Records System Supervisor develops procedures governing use of the Records System. Examples of the types of procedures to be developed include:

  - File Maintenance - Procedures must be set detailing how the Records System staff and program staff handle the records on an ongoing basis.

  - File Circulation - How records are checked in and out is the basis for the file circulation procedures. These procedures define methods for program staff to check out and return files.

  - Non-Standard Records (e.g., duplicate, draft, oversized and informal records) - Every Records System requires procedures to integrate non-standard records into the Records System.

  - Vital Records - Specialized procedures for handling vital records may need to be established to ensure that these records are protected from the point of creation onwards.

  - Sensitive Information - Special procedures must be established for sensitive information (e.g., enforcement sensitive or CBI). A security officer should be identified to maintain the protocol for access to this information.

- *Data Base System* - If a data base system is chosen, the file structure is designed in conjunction with the design of the data base.