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Management
(PM-211D)

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EPA INFO ACCESS

Records Network Communications

In this Issue ...

Better Files in 6 Months - Guaranteed!!

by Michael L. Miller, IMSD

The National Records Management Program (NRMP) is frequently asked to assist in creating file plans or improving filing practices. Since we can't visit all offices that need help, we have developed a self-improvement plan for managing files. Beginning with this issue of *INFOACCESS* we will present the NRMP's 6-step approach to better files. Each issue will feature step-by-step instructions that program staff can complete during the following two months. While the entire process will take a year, you will see considerable improvement in 6 months.

Should your unit undertake the self-improvement project?

Probably yes. Most Agency offices need to improve their files management. The only question is one of scale. The approach presented here works best for programs that are between 25 and 75 persons. The more homogeneous the program functions, the larger the unit can be and still get effective results. To begin the process, the unit head should select a small project team. The team should include representatives from all sub units and job series, not just support and clerical. In addition, the unit head must actively support the project and allow the project team time to do the work required.

Continued on page 2

12 Months to Effective Files

Here is the 6-step program to effective files. One step will be covered in this and each of the next five issues.

Step 1: Determine what records are most important to your program, who should be responsible for them, and where they should be located (Months 1 & 2).

Step 2: Conduct a records inventory of all the unit's records and match the records to the records disposition schedule (Months 3 &4).

Step 3: Develop a file plan and filing procedures for corporate records series (Months 5 & 6).

Step 4: Develop recordkeeping requirements for corporate records series (Months 7 & 8).

Step 5: Improve files management via technology, indexing, and specialized equipment (months 9 & 10).

Step 6: Produce a records management manual (Months 11 & 12). ❀

Don't forget to review this month's insert on Working Papers.

Better Files from page 1

Step 1: Understand the Scope of the Problem

The keys to good filing practices are filing only what you need to file, filing it in a way that facilitates access and disposition, and doing it consistently. To do this you first must analyze your program's records management needs by determining what records are most important to your program, who should be responsible for them, and where they should be located. To start the process take some time in your regularly scheduled unit meetings to discuss the four questions posed below. The unit head (division director, branch chief or section head) should lead the discussion.

Question 1: What kinds of records does the unit create?

Brainstorm about the types of records created in your program. Examples might include permit files, project files, reports, publications, time cards, personnel files, contract files, and so on. Develop a list and group similar types of records, such as multiple correspondence or subject files, together into series (See the box on this page). The series is the basic unit for organizing and controlling your files.

Question 2: Which of these records series are important to your program?

Look at each type of record and decide why it is created and maintained. Your program may be required to create and maintain records for a number of valid reasons including program administration, management reporting, statute, federal regulation, Agency policy or procedures. There are less valid reasons too, such as reference and personal convenience. Frequently the only justifications for maintaining files are personal ones such as "I need the records for reference," "Joe wanted me to keep a copy," "somebody may ask for it," and "I don't trust anyone else to keep it."

What is a Records Series?

Series are those file units or documents kept together because they relate to a particular subject or function, result from the same activity, document a specific type of transaction, take a particular physical form, or have some other relationship arising out of their creation, receipt, maintenance, or use. The series concept is a flexible one, and programs should be careful to create series by organizing their documents in ways that facilitate management of the records throughout their life cycle. ❀

If you are honest, you will probably find that many of the series on the list for your office are working files (See the insert included with this issue), files maintained simply for convenience, or reference materials. Put those aside for now, and concentrate your attention on the files that directly support the Agency mission or administration. These are your "corporate" records, without which your program could not function. They are the ones you need to control. Identifying the list of corporate records is the most important and the most difficult step in the files improvement process. Once that is completed the next two questions are easy.

Question 3: Who will be responsible for each of the records series?

This person, usually called the file custodian, may be a secretary or administrative officer, or a technical specialist, or the unit head. Generally there should be only one custodian per series (obviously each staff person is responsible for his or her own working files).

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INFOACCESS

INFOACCESS, a forum to provide information and report on progress in information management across the Agency, is produced by the Information Access Branch of the Information Management and Services Division, Washington, DC under the direction of Michael Miller, National Records Management Program Manager. Please send comments and suggestions to: Mary Hoffman (contractor), Network Coordinator, PM211B, 401 M Street, SW, Washington, DC 20460. Telephone: (202) 260-7762. Electronic Mail: Hoffman.Mary.

Sample Matrix for Corporate Files

File Name	Custodian	Location
Contract Files	Paul Goodman Administrative Officer	Division File Cabinet Room 226
Permit Files	Pam Butler File Clerk	File Room Room 231
Correspondence Files	Cindy Clark Division Secretary	Cindy's Desk Room 226
Ann Arbor Study	Tim Haas Project Manager	Tim's Desk Room 229A

Better Files from page 2

Question 4: Where will each series be located?

The location, called the file station, is discussed in more detail on page 6. Take this information and develop a matrix (See the sample at the top of this page) that lists all of your corporate records series, the person responsible and the file station.

To cover all of the items above will probably take more than one meeting, which is why we're allowing two months for this first step. Once the four questions are answered, you will have a theoretical framework for understanding and controlling your files. In Step 2, the records inventory, you will match this construct to reality. ♠

Should You Contract Out the Development of Your File Plan?

Contractors can assist programs in developing file plans, but no amount of contractor support can eliminate the need for staff involvement in the process. The most critical step in developing a filing system is determining the system requirements by analyzing how and why the files are created, how and why they are accessed, what needs to be included in the files, and how long files need to be retained and why. These are Agency decisions based on Agency knowledge and needs. Once these questions are answered, a contractor can take those answers and create a filing system to meet those requirements. Bottom line - contract out if you want, but realize that developing a workable file plan will still require lots of staff time and involvement. ♠

Tip of the Hat

INFOACCESS likes to recognize records and information management staff for excellent work in the field of records management.

Welcome to new records staff around the network!

◆ **Joseph Clore**, Information Services Section, Region 2, New York

◆ **Cheryl Brown** (contractor), Records Center, Region 4, Atlanta

◆ **Mark Bedford** (contractor), RCRA Records Center, Region 5, Chicago

◆ **Gail Brookhart** and **Susan Grause**, at the Risk Reduction Engineering Laboratory (RREL), Cincinnati

◆ **Carol Haynes**, Environmental Criteria and Assessment Office (ECAO), Cincinnati

◆ **Margaret Anderson** (contractor), Superfund Records Center, Region 6, Dallas

◆ **Katheryn Maddox**, Office of Cooperative Environmental Management, HQ

◆ **Dwayne Adlett**, Program Systems Division, Office of Information Resources Management, HQ

There are also three new records contacts in the Office of Prevention, Pesticides and Toxic Substances at Headquarters: **Robert Zisa**, Office of Compliance Monitoring; **John Carley**, Office of Pesticide Programs;

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File Stations

by Joe Moeltner (contractor) Headquarters Records Support

The integrity of the Agency's official files must be insured at all times, so that **all** official records relating to the operations of the Agency are captured in the official files. In most Federal agencies, as at EPA, files are dispersed among various offices, and each office file generally contains only a portion of the documentation on any given subject. As a result, Agency officials and records managers have had to develop ways to assemble complete information when records are incomplete, fragmented or found in different locations.

Fragmented Documentation and Files Overgrowth

Fragmented documentation and files overgrowth are interrelated problems that bedevil most modern offices. These all-too-common problems arise partly from the fact that many offices have the same functions and, therefore, interest in the same records. As a result, offices either maintain duplicate copies of the same records (**overgrowth**), or jealously guard their piece of the documentation pie (**fragmentation**), or both. Inefficient searching and inaccurate recordkeeping are the usual results.

These twin problems underscore the need for accurate and orderly filekeeping practices and procedures, and highlight the need for an effective information retrieval system. Such a system makes it easier for the Agency to access the records it needs efficiently and to fulfill the legal requirement to document its activities. Such a system does not develop naturally however; it must be carefully planned. A central component of such a system is the **file station network**.

What is a File Station?

A file station is any location in an organization where records are maintained for current use. File stations may vary in size, number and level of offices served, physical form of their contents, and formality of their authorization (designation). It may be a file room, a records center or a set of filing cabinets in the hall.

Federal agencies, as specified by 36 CFR 1224.2 (a)(2), should establish official file locations (file stations) for the filing of official records. A file station is every separate location at which official Agency records of any kind are accumulated in an organized manner.

Objectives of A File Station Plan

A well-developed, coordinated and organized Agency file station plan should result in:

- Better documentation of program activities.
- Greater knowledge of how and where to locate information.
- Quicker retrieval of complete records.
- More efficient use of personnel, space and equipment.
- Fuller compliance with legal authorities (*Federal Records Act* and *Privacy Act*).

Continued on page 5

Stations from page 4

Benefits of Designating Official File Stations

Some of the more practical benefits of an Agency's design of an official file station are that it:

- ◆ Prevents mushrooming of files in other locations.
- ◆ Helps prevent unnecessary duplication.
- ◆ Ends confusion as to the location of documents.
- ◆ Contributes to the completion of files.
- ◆ Aids in the disposition of records.

Where Should Your Files Be Located?

There are some key variables that should be considered when determining where files should be located. Records should be located reasonably close to regular users of those particular files. Records located in the same room, an adjacent room, or in the general vicinity of the majority of users will normally provide convenient access. Users located in separate buildings or at a considerable distance from the established file will invariably maintain duplicate files.

All too often convenience and the benefit of operating one's own files are used to justify placing files directly at the user's door. More important factors, however, should include:

Usage - Who will use the records, how frequently, and for what purpose? Those who use files for official actions are to be favored over others who have a need for the same records for informational purposes.

Security - The need for restricted access may lead to placing sensitive or restricted files apart from others, in an area where they can be best protected. Valuable records may also require special placement to protect them from fire, water, vandalism, theft, and rodent and insect damage.

Time - Frequent use for "immediate" retrieval prohibits combining of files. They must be placed to allow retrieval in the shortest possible time even if duplicate stations result.

Analyzing the information gathered during a file station survey will lead to preliminary planning of the most effective placement of the records.

An Ideal Information System

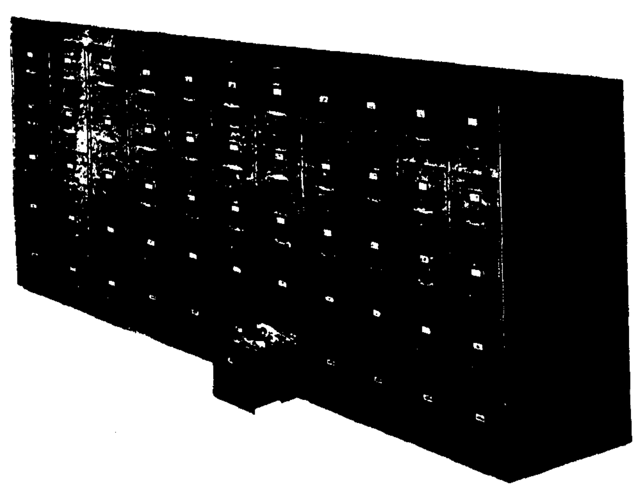
A file station network is a structure of file stations that are linked by such devices as a central reference service and a file station directory. It is a system that elimiates unnecessary duplication, speeds information retrieval and ensures proper documentation of agency functions.

Additional Information can be found in:

Files Stations, National Archives and Records Service, 1980.

EPA Records Management Manual, Chapter 7, U.S. Environmental Protection Agency, Office of Information Resources Management, 1984. Updated in 1986 and 1987.

EPA Model Regional Records Management Manual, Chapter II, U.S. Environmental Protection Agency, Information Management and Services Division, 1991. ❀



Pointers For Developing File Plans

by Lisa Jenkins and Bette Drury (contractor), Office of Solid Waste and Emergency Response

The following was developed to assist records managers in the Office of Solid Waste and Emergency Response.

- Keep any file structure simple. Keep numbering schemes to four or five digits and use mnemonic devices to help the user identify the files.

- Let case files structure themselves. Do not assign filing codes to records that can be naturally ordered alphabetically by name or numerically by number.

- When organizing your files, structurally **separate** non-record, technical reference material, and personal papers from your record material.

- It is best not to create elaborate structures for your technical reference material. This material is best organized according to the nature of the material.

- Organize your files so that **Administrative** files [e.g. Correspondence, Personnel, FOIA Requests records] are structurally separate from **Program** files [e.g. standards & guidelines, policy documents, work assignments].

- Filing structures should reflect the **Record Series** produced by your office. In other words, each major component of your structure should represent each record series generated by your office. These records series should correspond to the **EPA Agency Schedules**.

- Filing structures should only group records series when these three conditions exist:

  1) The series are so interrelated that it would be advantageous to link them together [e.g. Systems files - requirements analysis, development and documentation records].

  2) The series have the same retention value.

  3) The series serve a similar program function and have a short retention value of 5 years or less [e.g. office management records].

- Reserve any structural coding for the organization of the file contents for each record series. For example, for the Records Series, *Regulations, Standards, and Guidelines*, you could file within this structure:

  Primary Organization - files for each individual regulation to be filed alphabetically by the name of the regulation.

  Secondary Organization - documents for each regulation to be filed within major breaks such as general correspondence, survey or studies, drafts & comments, etc.

  Tertiary Organization - individual documents within each major break to be filed in reverse chronological order.

- Don't just create a structure; **create a filing system** addressing overall management of all your records throughout their life cycle.

- Filing systems should be explained in a **filing manual** which includes these components:

  ✓ File Structure in Outline Format.

  ✓ File Structure with Content Notes and Filing Guidance.

  ✓ Document Preparation Guidance.

  ✓ Folder Label Guidance.

  ✓ Special Records Handling Guidance.

  ✓ Circulation/Usage Guidance.

  ✓ Records Closure and Disposition Guidance.

  ✓ Index. ♣

Headquarters Update

Records Management Council

The Headquarters Records Management Council met on August 19th and September 24th. On August 19th, the principal agenda items were training sessions on "What is a Record" and "Preparing a Records Management Briefing." Mike Miller, IMSD/IAB, was the principal presenter; Lisa Jenkins, OSWER, and Deborah Ross, OW, contributed thoughts about their experiences briefing program staff. The Council members in attendance said they found the training sessions useful, and suggested several topics for additional briefings.

On September 24th, the principal agenda items were training sessions on "Records management roles and responsibilities," and "How to review and comment on records disposition schedules," conducted by Mike Miller. Harold Webster, IMSD, led a discussion on improving procedures relating to the destruction of records. The next Council meeting is scheduled for October 27, 1992.

NARA Center for Electronic Records

Mike Miller met with staff from the Center for Electronic Records on September 1, to discuss EPA's proposals for addressing a number of issues raised in the NARA evaluation including plans for :

- Revising EPA policies on electronic records management,
- Holding electronic records management training, and
- Scheduling EPA's electronic records systems.

They also discussed projected records disposition schedules that will be sent to NARA for approval in calendar 1993. These include Agency-wide, Region-wide, and Headquarters-wide schedules, and program-specific schedules for OSWER and OPPE. EPA will undertake to maintain a constant flow of transfers of electronic records to NARA. It was agreed that EPA will have 5 transfers in process at all times. The first transfers will be TRI and WHDMS which are currently under discussion. Mike Miller will arrange a meeting with the Office of Water to explore the transfer of STORET, NEEDS and BIOS to NARA.

GAO Followup on Records Management at DOE

You may want to read *Better Planning Needed to Correct Records Management Problems*, a GAO report about the status of the Department of Energy's response to a National Archives and Records Administration (NARA) evaluation. It illustrates what happens when agencies do not take sufficient action in response to NARA recommendations. In December 1988 NARA made over 30 specific recommendations regarding all phases of DOE's records management operations. In 1992, the Senate Committee on Governmental Affairs asked GAO to investigate the status of DOE's actions in response to the NARA evaluation, and GAO's findings are outlined in this report. *Better Planning Needed to Correct Records Management Problems* [GAO/RCED-92-88], May 1992, is available from the U.S. General Accounting Office, P.O. Box 6015, Gaithersburg, MD 20877; orders may also be placed by calling (202) 275-6241.

In brief ...

- **Revised Records Disposition Schedules** are being circulated for review. If you would like to review them, check with your SIRMO.

- IMSD distributed some information about **changes in NARA regulations** and copies of **EPA's response to the NARA Evaluation** in September. If you did not receive this information and would like it, contact Joe Moeltner (contractor), Headquarters Records Support at (202) 260-5272. ♣

Records Management Training for FY93

At EPA ...

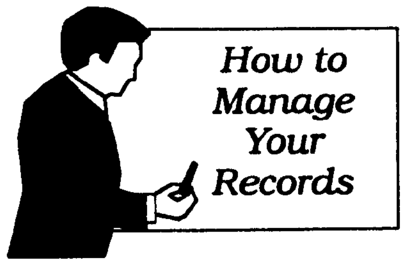
The National Records Management Program (NRMP) has scheduled several records management training workshops for Fiscal Year 1993:

November 18-19, 1992
February 17-18, 1993
April 28-29, 1993
June 16-17, 1993

The two-day training sessions cover files maintenance and disposition, retirement and disposal of inactive records, and retrieval of records from the Federal Records Center. The workshops are targeted for administrative officers and assistants, secretaries, clerk-typists, and other employees responsible for the day-to-day management and maintenance of files.

The cost of the workshop is $150.00 per two-day session, and the location will be announced by NRMP and the EPA Education Institute prior to each session. The workshop scheduled for November 18-19 will be held in the Muir Room in the EPA Education Center at Waterside Mall. If you are interested in attending, fill out your SF-182 and forward it to Debora Dorsey at PM-224.

If you would like to know more about the workshops, contact Harold Webster, Information Management and Services Division, at (202) 260-5912 or Debora Dorsey, EPA Education Institute, at (202) 260-6678.



New Workshops Planned

NRMP is also planning a new series of work shops on the development and maintenance of filing systems. The new workshops are tentatively scheduled to begin in March 1993. Watch future issues of *INFOACCESS* and NRMP mailings for more information about new records management workshops.

At NARA ...

The National Archives and Records Administration (NARA) schedule of Records Administration training for FY93 is now available; it includes the following courses:

Basic Courses

▲ *Introduction to Records Management* - a one-day course on the basics of Federal records management.

▲ *Files Improvement* - a two-day course on developing and using filing systems for the proper management of current Federal records.

▲ *Records Disposition* - a three-day course that provides an introduction to managing Federal records no longer needed for current Government business.

Advanced Courses

▲ *Scheduling Records* - a two-day course offering intensive training in developing and updating agency records schedules.

▲ *Managing Electronic Records* - a two-day course on managing electronic, or machine-readable records throughout their life cycle.

▲ *Managing Audiovisual Records* - a one-day course on managing audiovisual records.

▲ *Managing Microform Records* - a one-day course on managing microform records and micrographic systems.

▲ *Automating Records Management* - a one-day course on developing an automated records management program.

▲ *Evaluating Records Management* - a one-day course on assessing the effectiveness of a records management program.

▲ *Promoting Records Management* - a one-day course on how to publicize an agency records management program.

Contact Joe Moeltner (contractor) Records Support at (202) 260-5272 [or on All-in-1 at Moeltner. Joseph] for copies of NARA's 1993 training schedule. ♣

Managing Electronic Records: A New Delivery Order

The Information Management and Services Division has a new delivery order (D.O.) titled "Support for Analysis and Assessment of Requirements for Managing Electronic Records and the Adequacy of Existing Policies and Procedures."

The D.O. is under the Information Technology Architectural Support (ITAS) contract and the Delivery Order Project Officer (DOPO) is Mike Miller, Agency Records Officer. The alternate DOPO is Geoff Steele, Information Management Branch, IMSD, and Deborah Singer-Redner of National Data Processing Division (NDPD) will serve as one technical reviewer.

The purpose of the D.O. is to review the federal requirements for managing electronic records, identify Agency needs in the area, and evaluate how well current policies and procedures meet both sets of requirements. The project will look at records management, IRM, and NDPD policies from a records management viewpoint and suggest a framework for addressing the requirements by revising Agency policies and procedures as needed.

IMSD would like to include program staff on the project team. If you are interested in participating, or would like someone on your staff to participate, please email Mike Miller (MILLER.MICHAEL-OIRM) and give him the person's name, address, telephone number, and All-in-One address. He will send a copy of the statement of work.

Please indicate whether you / they merely wish to be kept informed of developments (in which case IMSD will send copies of all final deliverables) or would like to be involved in the development

process (in which case IMSD will send copies of all drafts for comment plus final deliverables).

We hope a number of you will be interested in participating in this project. Electronic records management is one records area that arouses interest among records managers and IRM staff, which is one reason why IMSD is sponsoring this study. Wide participation by program staff will ensure that the results are realistic and useful. ♣

Tip of the Hat from page 3

and **George Bonina**, Office of Pollution Prevention & Toxics.

Lets Hear It for Region 7!

Pat Shirley (contractor) reports that the first records are now on the shelves in the new Region 7 Records Center. Hope the rest of the unpacking goes as planned!

Good work in OW Records!

Dave Hoadley, Office of Water (OW), received an on-the-spot award for his work in evaluating OW materials in the Public Information Reference Unit (PIRU) and identifying selected documents for transfer into the new OW consolidated docket.

Farewell to PIRU!

The Public Information Reference Unit (PIRU) located in Room 2904 at Headquarters was closed effective September 30, 1992. We salute all the hard work that went into its successful closure. ♣

Around the Records Network

This section of INFOACCESS is used to report on upcoming meetings and projects currently underway in the Regions, Laboratories, and Headquarters. Anyone with contributions for this column should contact Mary Hoffman (contractor), Network Coordinator, at (202) 260-7762.

Region 1 - Draft Regional File Plan

Records staff are working with the Deputy Director of the Planning and Management Division and staff to implement a draft file plan for their office records. The office is being piloted for application of a draft regional file plan for facilitative records, which was adapted from the 1985 EPA/OIRM File System.

Region 4 - Tools for Training Regional Staff

Doug Haire (contractor), and Lorrie Burroughs (contractor), Regional Records Management Project, completed drafts of two training manuals emphasizing revisions in the Regional records program. The two manuals, one designed for EPA managers and program staff, and the other designed for EPA support staff, provide a general overview of program requirements and each presentation is tailored to that particular program element. This approach offers each division a familiarity with the general records requirements for their area. Training is provided by division, branch, section, and unit to increase program understanding of records management principles.

Region 4 - Facilitating Transfers to the FRC

Chris Decker (contractor), Regional Records Management Project, identified 1000 boxes that were held in Region 4's Records Holding Room and created a color-coded system to facilitate the transfer of boxes to the Federal Records Center. The color-coded system will speed the disposition process by identifying what boxes are ready for shipment, what boxes need further inventories, and what boxes are active or inactive.

Region 5 - Section File Work Groups

Since the move to the new building in December of last year, the Water Permits and Compliance sections in Region 5 have organized Section File Work Groups. Each section work group is comprised of 2-3 professional employees, the Water Division Records Liaison and the Regional Records Officer. The purpose of the work group meetings is to discuss records issues and problems. Since the work groups were formed six months ago, communication between the two sections and management has improved.

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Around from page 10

Interested in a Record Clerks Network?

In addition to Divisional records work groups, it is also important that records staff exchange ideas Agencywide. As John Bernstein mentioned in his "Guest Column" in the August issue of *INFOACCESS*, he is interested in establishing an Agency network of records clerks. If you are interested, please contact him either by e-mail: Bernstein.John, or at (312) 886-7678.

Region 5 - Records Procedures Manual

Records staff completed the final draft of the *Region 5 Waste Management Records Center Procedures Manual* in August. The manual gives detailed information on all tasks performed in the Records Center and is maintained in paper and electronic form for easy updating.

Region 6 - SF Records Center Procedures

Superfund Records Center staff are working on draft procedures for managing OSWER directives, cost documentation files, Federal facilities docket files, NPL site docket files, enforcement consent decrees and Record of Decision files.

Region 9 - Quality Assurance Procedures

Staff in the Region 9 Superfund Records Center have developed a new database report feature that enhances the quality assurance (QA) review of site file indexing. The new feature gives indexers the capability to quickly and easily generate a report that lists, in numerical order, the range of documents indexed during any particular time frame, e.g. day or week. The staff can then check each database record against the document itself, verifying data entry for problems such as misspellings, incorrect site I.D. numbers, etc. This procedure will serve as the first step in the Records Center's indexing quality assurance program.

Region 10 - New Records Center

During August and September, Hazardous Waste Division records staff completed their move into a new records center. Files which were previously maintained in two separate areas were integrated into a new filing system. Previous delineation by geographic area and status (active/NFA) was eliminated and all site files were integrated alphabetically. The new records center includes Removal, Remedial, CERCLIS, and NFA files; National Priorities List Docket files; Spill Prevention and Countermeasure files; Technical Assistance Team files; and all Federal Facilities Site files. The new system will make the site files more accessible to all records center staff and will facilitate more efficient service to the client. ♣

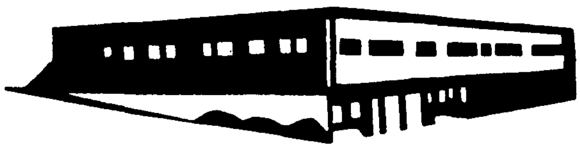
Region 2 Reorganizes

Effective October 19, 1992, the Information Systems Branch in Region 2 will include a new section: the *Information Services Section* (ISS). ISS will be responsible for the Region 2 Library and records management, including the operation of a consolidated RCRA/NPDES/Air Permit file room. The chief of the new section is Joseph Clore. Joseph and Bob Messina, Chief of the Information Systems Branch, will be working closely with Mike Miller to evaluate the current status of records management and to begin planning for their move into the new Region 2 building. ♣

Notice of Intent to Destroy Records: Draft Revised Procedures

by Harold Webster, IMSD

Procedures for processing scheduled records eligible for destruction, in accordance with Agency Records Control Schedules, are presently being revised to ensure that the destruction notices have been reviewed by those within the programs who can authorize destruction of records.



Form 13001 - Notice of Intent to Destroy Records

Agency records stored in the Federal Records Center (FRC) located in Suitland, Maryland (approximately 6 miles from Waterside Mall) become eligible for destruction in quarterly cycles (January - April - July - October). When records become eligible for destruction the FRC sends National Archives (NA) Form 13001, Notice of Intent to Destroy Records to the Headquarters Records Officer . The NA 13001 includes the following information: accession number, disposal authority, type of records, date of notification, and date of disposal.

The Current Process

Currently when a copy of Form 13001 is received from the FRC, the Headquarters Records Officer (HRO) retrieves a copy of the Standard Form 135, *Records Transmittal and Receipt*, and attaches a cover memo, *Subject: Notice of Intent to Destroy Records,* listing all SF-135's for records eligible for destruction. The cover memo with copies of the SF-135's attached, is sent to the program responsible for the records. It is addressed to either the Division Director, Branch Chief, or an individual authorized by the program to receive records destruction notices.

The HRO then allows the program twenty (20) working days to either concur in the destruction or submit a written justification for extending retention of the records. The written justification must include a proposed new disposal date and the specific need to maintain the records such as audit, litigation, or cost recovery.

Under existing procedures, if the addressee did not respond within twenty working days, the HRO was allowed to assume that the records were no longer needed and took the appropriate actions to assure destruction. The problem is that the possibility exists that the destruction notices may not have reached, or been reviewed by the person(s) responsible for the records.

Revising the Process

The draft revised procedures offer benefits to both the program and the HRO. Under the revised procedure the programs would sign and return a form authorizing destruction of all, some, or none of the records. The remaining question is to whom the form should be sent and how follow up should be conducted. The Headquarters Records Management Council has recommended that the HRO ask each program to designate a person to coordinate responses. That memorandum will be sent out this month and will be discussed at the October 27 Council meeting.

Questions concerning the draft procedures can be directed to Harold Webster at (202) 260-5912.