



INFO ACCESS



Records Network Communications



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Step 5: Applying Technology to Records Management

by Michael L. Miller, Agency Records Officer

People frequently turn to technology because they find that they can't manage their paper records. Either they are swamped by too much paper on site, or they can't find the documents they need, or both. By itself, technology cannot fix a records management problem; technology applications need a lot of research and planning to be effective. The old saw is true: if you try to automate a records management mess you will have an automated mess.

However, technology, even simple technology, can make a basically sound records management system operate better. This article will look briefly at a number of technological "fixes" and the types of problems they can help remedy. For more technical guidance on applying technology, I strongly recommend the new General Services Administration publication, *Applying Technology to Records Systems* (see page 3).

Before You Cut the PR ...

There are two steps to take before rushing out to buy any hardware or software. These steps are equally valid if you are looking to improve a cabinet of branch correspondence files or the management of millions of Superfund documents. The scale may be different, but the steps are the same.

First, take the time to study the current situation, diagnosing what the problems are with the current recordkeeping system, analyzing what needs to be done to meet those needs, and then planning out what a new system should accomplish. Second, examine whether a simple change in how you currently do business can remedy your problem. In many cases improving the manual system can either solve the problem or at least allow you to focus the technology application on improving specific aspects of the records system. Examples of "manual solutions" to records problems are provided below.

However, simple fixes don't always resolve the problem, and in many cases, such as the Superfund program, the sheer volume of records and the special problems they pose mandate that the program go beyond a well run manual system to implement technology solutions.

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Applying Technology

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Types of Technology Applications

There are 7 basic types of technology applications to assist you in managing your records better:

- ❖ Better filing equipment to improve the storage and retrieval of records.
- ❖ Document conversion technology such as optical imaging and microform to reduce the volume of paper on site and allow more efficient workflow.
- ❖ Document indexing to allow for retrieval of records in multiple ways.
- ❖ Document tracking and control systems to enable you to track documents or folders from creation to final disposition.
- ❖ Special purpose programs that allow you to automate specific aspects of records management such as records disposition schedules or retiring records to a Federal records center (FRC).
- ❖ Document access and distribution media records managers can use to allow staff to access information electronically.
- ❖ Electronic forms programs to improve workflow and increase the usability of information contained on the forms.

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, PM-211B, 401 M Street, SW, Washington, DC 20460. Telephone: (202) 260-7762. Electronic Mail: Hoffman.Mary.

Matching Technology to Problems

Let's look at our two typical records management problems and see what types of solutions technology offers.

Too Much Paper!!

Manual Solutions:

The manual solutions to consider include retiring older records to the FRC, destroying them based on the records disposition schedule, separating out non record materials from records, and separating working files from final documents.

Better Filing Equipment:

If reducing paper volume can't solve the problem, something as simple as better filing equipment may help you to manage the volume better. People normally jump to the conclusion that they need compact (movable) shelving, but other options such as open shelving, lateral files and specialized folders, lectrifiers, and filing cabinets specifically designed to handle specialized media or oversized documents may allow you to fit more documents into existing space.

Media Conversion:

Conversion of the existing paper to microform or optical images allows you to maintain the largest volume of documents in the least space. However conversion is expensive, and you need to be sure that you've studied the records system so that:

- 1) you are only converting the documents you need, and
- 2) you have an approach to indexing those documents that allows you to retrieve them efficiently.

Both take considerable planning. The final caveat is that, generally, it is not cost effective to convert documents to digital images just for storage. To justify the cost, the conversion needs to improve the way you process and manage those documents. Most on that in the next issue of *INFOACCESS*.

Continued on page 3

Applying Technology to Records Systems: A Media Guide

As technology continues to expand our informational horizons and increase its importance in our working lives, we find more and more options regarding the way we handle recorded information. With this increase in options, there is a corresponding increase in the number of decisions that must be made regarding the record media.

Continually engaging in unplanned, costly, time-consuming and disruptive media conversions is not the most productive method of information management. Record systems can be designed that function effectively throughout the entire information life cycle. By fully understanding the available media, necessary conversions can be planned for as an integral part of the records system operation and can be conducted efficiently and economically.

This *Media Guide* was created by the U.S. General Services Administration (GSA) to help Federal agency personnel more fully understand their media options. It discusses paper, microform, digital storage, magnetic media, optical media, and their physical properties and limitations. There are specific chapters on the properties of records that affect conversion, indexing, storage and retrieval, information capture, and cost considerations. The final three chapters look at organizational considerations, matching media to needs, and approving a change in the medium.

A copy of this publication is being sent to records liaisons in each Headquarters Program office, laboratory, Regional office and facility. If you have any questions regarding technology or records systems, please contact Michel L. Miller, Agency Records Officer at (202) 260-5911, or on All-in-1 at MILLER.MICHAEL-OIRM. If you would like to obtain a copy of this publication, please contact Joe Moeltner (contractor) at (202) 260-5272, or on All-in-1 at MOELTNER.JOSEPH. ✻

I Can't Find What I Need

The second major problem most records managers face is the inability to find the information they need when they need it. This can result from two basic causes: not having sufficient information about the documents to locate them effectively, or not having sufficient security to ensure that they will be where they are supposed to be when needed.

Manual Solutions:

Basic manual solutions include establishing a file plan and following it, improved filing techniques, cross referencing of documents, improving physical security, and using charge out cards.

Document Indexing:

Document indexing is the easiest way to improve your ability to locate the records you need. For major records series such as premanufacturing notices or Superfund administrative records, indexes may run to 15 to 30 fields, or more. But indexing need not be terribly complex to be useful. An index that includes addressee, date, file code, and subject would solve many records management problems and simplify filing.

Document Tracking and Control:

Everyone complains that documents or folders "disappear" from the files and can't be located. On one hand control of documents throughout their life cycle is first of all a matter of establishing procedures and enforcing them. The most sophisticated automated tracking system won't work if staff simply are free to remove documents from the file room. However, records management software and / or bar coding systems can provide an excellent means of tracking documents once the procedures are in place.

Additional Technology Applications

In many cases records managers need help in managing their own information. What records have been retired to the FRC? Where are those records scheduled? How can I make records management procedures available to everyone? Technology can help solve these questions too.

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Special Purpose Programs

There are several areas where automation of one or more phases of the life cycle can simplify records management tasks. There are several programs available that Regions can use to develop the SF-135 form to retire records to the FRC. Using the FRC's Center Information Processing System (CIPS) simplifies the records retrieval process. Region 5 and others have put the records disposition schedules into packages such as InMagic to enable them to print out customized products tailored to individual program needs. Just having schedules in WordPerfect allows them to be searched for individual terms. These relatively low cost systems save a lot of effort and provide great benefits in terms of improved control over your information.

Document Distribution

Providing increased access to information is one place where technology offers a number of options. In looking at the dissemination of records disposition schedules for example, it is possible to consider distributing them on diskette, putting them in a relational database, providing the text online via a bulletin board or videotext in All-in-1, or supplying them to programs on CD-ROM and loading them onto the local area network. Individual programs are looking at similar methods for getting their program specific information out in electronic form.

Workflow

One of the fastest growing areas in records management is to create, process, and store records electronically without ever going to paper form, or the processing and storage of documents converted to electronic forms from paper. We'll look at this questions in the next issue of *INFOACCESS*.

Don't Reinvent the Wheel

Most of the records management applications discussed above are operational in one or more Agency offices. To find out more about where a specific application is being used, contact Sandy York (contractor) on (303) 840-0464, or York.Sandy on All-in-1. ✿



6 Steps to Better Files

This article is the fifth in a series of six that form the steps of a program to effective files management. Four previous steps have been outlined in the records management issues of *INFOACCESS*, between October 1992 and June 1993.

Reprints of those four "Step" articles are available in a flyer format from the National Records Management Program (NRMP).

6 Months to Better Files, May 1993, EPA 220-F-93-007. [An overview of the series]

Step 1: Understanding the Scope of the Problem, May 1993. EPA 220-F-93-008.

Step 2: Conducting a Records Inventory, May 1993. EPA 220-F-93-009.

Step 3: Developing the Filing System - The Filing Structure and File Plan, May 1993. EPA 220-F-93-010.

Step 4: Developing Recordkeeping Requirements, July 1993. EPA 220-F-93-012.

The article outlining **Step 6: Producing a Records Management Manual** will appear in the October issue of *INFOACCESS*. ♦



Headquarters Update

Records Management Council

The Council meeting for July was hosted by the Office of Pollution Prevention and Toxics, who conducted a tour and demonstration of their image processing system, a tour of their Confidential and Non-Confidential Information Centers, and a demonstration of their automated document tracking system. See the article beginning on page 8 for a description of the tours and demonstrations. The next Council meeting is scheduled for August 26th, in IMSD's Conference Room, at 10 am.

CBI Workgroup

The Workgroup that is revising the Agency's confidentiality regulations at 40 CFR Part 2, Subpart B is reviewing a second draft of the proposed revised regulations. Workgroup closure is scheduled for August 31.

Manuals on CD

The National Records Management Program (NRMP) is participating in a project to put IRM policy manuals on CD-ROM. The CD will include several records management publications such as the records management manual, the Headquarters guide to using the FRC, and the Model Regional Manual.

Regional RM Teleconference

The regular Regional records management teleconference was held on June 23. Participating records managers discussed a number of issues, including timekeeping records, Regional response to the NARA evaluation, revised records disposition schedules and records inventories. Mike Miller asked for volunteers for a workgroup that will develop inventory-related materials for Agency records managers. After some discussion about the

workgroup, the Regional Records Officers reported on the status of work in progress at their sites. The next teleconference is scheduled for Thursday, September 2nd at 2:00 pm.

RM Guidance Bibliography

Under the direction of Lisa Jenkins, Records Officer, OSWER's records management staff have developed a bibliography of records management guidance. The bibliography includes file structures, records center operations manuals, filing systems, guidance manuals, floor plans, records center procedures, and microfilm standards.

Records Management Training Available

The NRMP will come to your facility to do records management training. At this point the organization requesting training must pay travel expenses, but training will be tailored to your specific needs. Mike Miller, Agency Records Officer, recently completed training sessions for the Office of Research and Development laboratory in Athens and the Office of Solid Waste. Training is on a first come, first serve, basis at this point. Contact Mike Miller at (202) 260-5911, or MILLER.MICHAEL-OIRM on All-in-1 for details.

Headquarters Records Management Initiatives

The Office of Administration and Resources Management and the Office of Enforcement have initiated projects to evaluate their records management needs using contractor support. Their statements of work are based on a model Statement of Work developed by the NRMP. Work will begin during FY 94. For details contact Mike Miller at (202) 260-5911 or MILLER.MICHAEL-OIRM on All-in-1. *



Determining Landmark Status in Region 1

During a Regional records management teleconference held earlier this year, Yvonne Pederson, Region 9's Records Officer, initiated a discussion about enforcement action case files. Barbara Callahan (contractor), commented about the way the Region 1 works with Agency attorneys to determine "landmark status" for enforcement cases. We asked the Region 1 records management staff to elaborate on those comments for the network, and they provided the following description of the process.

Enforcement Action Case Files

The disposition of enforcement action case files is governed by EPA Records Control Schedule NC1-412-85-20, Item 5. When no legal action or routine legal action is required for a case, the total retention period for the files is five years and twenty years respectively; the files are temporary.

But for "landmark status" cases, the files are permanent. After the case is closed, the files remain in the office for five years, then the files are transferred to the Federal Records Center (FRC) for another fifteen years, after which the files are offered to the Regional Archives.

Research into Landmark Status

The Regional records management staff examined a National Archives and Records Administration (NARA) Disposal Authority Report and other Regional documents, and spoke to senior officials at the Boston FRC to derive guidance for Regional staff to follow when assigning landmark status to Regional enforcement cases. [According to the NARA Disposal Authority Report (08), as of May 1991, only the Washington National Records Center has scheduled landmark cases. They used disposition authority NC1-412-85-2/5AB: administrative law judge (ALJ) case files. All ALJ cases sent to Headquarters are considered landmark, without further differentiation, but the Regional portion of an ALJ case is not covered by this.]

Region 1's Discussion about Landmark Status

A meeting was held on May 4th with a twofold purpose: to establish criteria for Region 1 attorneys to follow when assigning landmark status to enforcement case files; and to review the list of case files located in the Regional Office's Records Center and assign landmark status where appropriate. Regional records management staff and Office of Regional Counsel staff participated in the meeting.

The group was of the opinion that the following criteria should be used in the determination of landmark status:

- ◆ Significantly complicated site with many units and multiple media.
- ◆ Precedent in how the site was treated.
- ◆ New legal territory, that is of historical significance in the development of the law.

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- ❖ Significant controversy involved.
- ❖ Whether the case was taken to the Appeals Court.
- ❖ Attorney "instinct."
- ❖ Enormous sums of money involved.
- ❖ Great number of parties involved.

The group also believed that landmark status would be infrequently assigned and most often only after a case was closed. Also, congressional inquiry or being cited in Region 1's *Enforcement Accomplishments Report* were not singular criteria to use. As a result of the meeting, a number of cases were designated as "landmark" cases that will require permanent retention.

As a followup to the meeting, the group defined a number of action items, including the flagging of case files recently assigned landmark status; consolidation of case files lists; establishing of an annual review of closed cases with Regional attorneys at the time the *Enforcement Accomplishments Report* is written; reviewing criteria considered by other agencies when assigning landmark status; and defining part of the file to include when retiring landmark status case files. ❖ *Contributed by Barbara Callahan (contractor), Region 1 Records Management Coordinator*

Tip of the Hat

INFOACCESS likes to recognize records and information management staff for excellent work in the field of records management, the development of special products, completion of significant projects, or acknowledgement of Agency awards.

Welcome to the Network!

- ❖ **Joan Alcock**, Office of Enforcement, Headquarters
- ❖ **Ellen Hunt**, Environmental Research Laboratory, Duluth, Minnesota

Recognized for Community Service

A few of our colleagues were awarded EPA's Employee Recognition Award for their community service.

Dot Cook (Office of Pesticide Programs) was recognized for her work with several organizations in the area, including House of Ruth and My Sister's Place. She also teaches fellow employees about cultural diversity.

Brenda Daly (Office of Information Resources Management) was recognized for her work with Children's Hospital and the Hospital for Sick Children.

Bessie Hammel (Office of the Administrator) was recognized for her coordination of an effort to collect Christmas gifts for children at St. Ann's Infant Home.

Keep Up the Good Work !!

We tip our hats to **Nancy Yarberry** and all of the Region 6 records staff who are incorporating records management requirements in their imaging initiative.

Thanks for the Memories!

We also tip our hats to **Mary Hoffman** (contractor) who is leaving after 2 years as editor of *INFOACCESS*, for all of her work in making the newsletter what it is. Best of luck!!



OPPT Hosts HQ RM Council Meeting

Georgianne McDonald, from the Information Management Division of the Office of Pollution Prevention and Toxics (OPPT), invited the Headquarters Records Management Council to attend a special session of the monthly Council meeting in OPPT space. Several Council members participated in a tour of OPPT's Non-Confidential Information Center and demonstrations of its optical disk system and automated document tracking system.

OTSIPS [Office of Toxic Substances Image Processing System]

The meeting/tour started next to OPPT's 64-platter jukebox in OPPT's computer room. Joanne Martin and Les Smith, OPPT's computer experts, talked about the system and the importance of their relationship with the OPPT scientists and researchers. OPPT chose to develop an optical disk system for its records because of the volume of material, especially the documents related to Pre-Manufacturing Notices, to be managed. They started scanning Section 5 (TSCA) documents into the system in September 1991. Approximately twelve fields are indexed; the case number serves as the unique identifier in the system.

Scanning Documents

The scanning and quality control is performed in an adjacent office. Once the documents have been scanned into the system and quality control has been completed, the paper copies are boxed and shipped to the Federal Record Center, to be disposed according to the Agency's records disposition schedules. Currently OPPT staff are rewriting all records disposition schedules to include the optical records, and they hope to expand the system to include documents relating to TSCA's Section 8. Since 1991, OPPT has added several terminals in its offices for staff to view the documents, and has produced no microfiche for the documents added to OTSIPS.

Retrieving Documents

Retrieval of the documents on the system can be accomplished by menus, including the retrieval of related documents. These related documents have been linked logically by reviewers familiar with



the information included in them. It was interesting to note that the documents are stored on optical disk but the index values that facilitate searching are stored on magnetic tape. The workstations connected to the system have a number of features to facilitate retrieval and use of the documents, including boolean logic and wild card characters to enhance the search process, graphics capabilities, magnification of all or parts of documents, the ability to rotate the image on the screen, the ability to redact parts of the document.

NCIC [Non-Confidential Business Information Center]

As she walked them through the Non-Confidential Information Center, Georgianne McDonald informed the group that it was "moved" to the Information Management Division when OPPT reorganized in 1992. Since the reorganization, IMD staff have reviewed and revamped the flow of documents between all sections of TSCA, and are rewriting records disposition schedules to make sure that all documents are covered and that the schedules better reflect the life of the documents.

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Georgianne commented that TSCA's complexity is mirrored by its records; its sections don't interrelate much. The documents managed by the OPPT dockets contain information from the 1970's to the 1990's, some of which have been retired to the Federal Records Center. (See the box on this page for additional information about TSCA dockets.)

CBIC [Confidential Business Information Center]

Next Georgianne walked the group to the Confidential Business Information Center (CBIC), which is in the basement of the East Tower. The group was not able to tour inside the Center because of the sensitivity of the information stored there. Georgianne and Bette Drury (contractor), talked to the group just inside the door of the Center.

The CBIC is composed of the Document Receipt Office (DRO), the Original File Room

(OFR), and the Document Disposition Unit (DDU). The DRO forwards time-sensitive documents to the OPPT staff, who determine the document types. The OFR is the repository for most of the TSCA related documents. The CBIC uses two systems to track the documents it manages, the Document and Personnel System (DAPS) and the Confidential Business Information Tracking System (CBITS). The CBIC works with the Document Control Officers (DCOs) in the Regions to track documents sent and received.

Automated Document Tracking System

Les Smith introduced the group to OPPT's automated document tracking system. He assured the group that the system does fulfill requirements for tracking CBI documents. It was developed in dBase III+, as a PC stand-alone version; a LAN version would require a great deal of additional programming. It will be released to the Agency eventually, after some testing is done.

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OPPT Dockets

Since OPPT's reorganization in October 1992, Georgianne McDonald has been overseeing the management of its dockets, including the

- ◆ Non-Confidential Business Information Center (TSCA Sections 5 and 8)
- ◆ Environmental Leadership Program (ELP)
- ◆ Integrated Risk Information System (IRIS)
- ◆ Design for the Environment

At a June meeting of the Headquarters Records Management Council, Georgianne talked about the dockets, explaining that the OPPT dockets are more complex than those managed by some of the other programs.

She said that beginning last October, OPPT staff have been meeting weekly to review the management and operations of the dockets, focusing particularly on the flow of documents between the sections of TSCA. They produced flowcharts to document the flow of the documents and then planned to streamline the process for automation. This group decided to convert the documents directly to optical disk, bypassing storage on microfiche or microfilm. OPPT is beginning to develop the indexes needed to access the material for Sections 5 and 8 of TSCA.

As OPPT worked its way through this process of review and analysis, the staff received and responded to several requests for assistance from other program offices, including the Office of Air and Radiation and the Office of Water. ☼

Records Management and the Revised OMB Circular A-130

by Michael L. Miller, IMSD

The revised Office of Management and Budget (OMB) Federal Information Resources Management (IRM) Circular A-130 (commonly referred to as A-130) finally became effective on June 125, 1993. A-130 seems to have been in draft (s) forever and its publications in final form is an important milestone for records management in the Federal government. Why? Because one of the reasons for revising A-130 was "to bring into focus ... areas not sufficiently emphasized in the original," and one of those areas is records management.

Records Management and IRM

The revised A-130 now places records management squarely within the IRM framework, and stresses the need to manage electronic records as a federal information resource. The sections of the revised circular most pertinent to records managers have been excerpted [See the box on this page]. However I would like to briefly summarize the changes here, because many of them consistute a strengthening of the role of records management in IRM.

Taking a Closer Look at the Sections

For records managers, the important changes in A-130 begin in Section 6, Definitions. Because the circular now explicitly addresses records management, Section 6 now includes definitions of "record," "records management," and "information life cycle." More good news is that OMB has decided to use the existing definitions of records and records management from 44 USC 3301 and 2901 (2) respectively.

Section 7, Basic Considerations and Assumptions, includes a paragraph on the importance of records management in sound public resources management. The thrust of this paragraph is the need for public accountability and

Excerpts from Circular A-130 Revised [June 25, 1993]

Section 6 Definitions

h. The term "Information life cycle" means the stages through which information passes, typically characterized as creation or collection, processing, dissemination, use, storage, and disposition.

n. The term "records" means all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the government or because of the informational value of the data in them. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and of processed documents are not included. (44 U.S.C. 3301)

o. The term "records management" means the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, records maintenance and use, and records disposition in order to achieve adequate and proper documentation of the policies and transactions of the Federal Government and effective and economical management of agency operations. (44 U.S.C. 2901 (2)).



Section 7 Basic Considerations and Assumptions

h. Systematic attention to the management of government records is an essential component of sound public resources management which ensures public accountability. Together with records preservation, it protects the government's historical record and guards the legal and financial rights of the government and the public.

Section 8 Policy - a. Information Management Policy

1. Information Management Planning.

Agencies shall plan in an integrated manner for managing information throughout its life cycle. Agencies shall:

a. Consider, at each stage of the information life cycle, the effects of decisions and actions on other stages of the life cycle, particularly those concerning information dissemination.

j. Record, preserve, and make accessible sufficient information to ensure the management and accountability of agency programs, and to protect the legal and financial rights of the Federal Government.

k. Incorporate records management and archival functions into the design, development, and implementation of information systems.

4. Records Management. Agencies shall:

a. Ensure that records management programs provide adequate and proper documentation of agency activities;

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the role of records in assuring that accountability is possible. The explicit inclusion of records management as part of IRM also gives new meaning to some of the other paragraphs in Section 7, notably the ones on accessibility (7f), privacy (7g), strategic planning (7i), and information of State and local governments (7j)).

Section 8a, Information Management Policy, now has an entire subsection (4) on records management. According to 8a (4), agencies shall provide adequate and proper documentation of their activities, ensure the ability to access records regardless of medium, schedule their records, and provide training and guidance on records management responsibilities.

Most records managers will find these to be familiar requirements, drawn directly from the National Archives regulations in 36 CFR 12. Most IRM types rarely read 36 CFR; but they are familiar with OMB A-130, which allows records managers an opportunity for closer cooperation.

Finally in Section 9 on responsibilities, OMB A-130 requires agencies to create, maintain, and dispose of records according to the Federal Records Act. In Section 9a (10), the Circular directs agencies to designate an official with responsibility for management oversight of agency audiovisual productions and establish a program for management of audiovisual productions, facilities, and activities, in accordance with 36 CFR 1232.4, the National Archives regulations on audiovisual records. This change will also serve to strengthen the role of records managers in the management of audiovisual records.

A-130 contains a number of other major changes that will be of interest to records managers. The entire circular now embodies a new spirit of promoting access to government information that may have a major effect of records management long term. Those who deal with the Privacy Act information should be sure to review Appendix I of the Circular. *

OMB Excerpts from page 11

- b. Ensure the ability to access records regardless of the form or medium;
- c. In a timely fashion, establish, and obtain the approval of the Archivist of the United States for, retention schedules for Federal records; and
- d. Provide training and guidance as appropriate to all agency officials and employees and contractors regarding their Federal records management responsibilities.

Section 9 Assignment of Responsibilities

a. All Federal Agencies. The head of each agency shall:

6. Create, maintain, and dispose of a record of agency activities in accordance with the Federal Records Act of 1950, as amended.

10. Designate an office with responsibility for management oversight of agency audiovisual productions and establish an appropriate program for the management of audiovisual productions, facilities, and activities in conformance with the requirements contained at 36 CFR 1232.4. ★

Media Coverage of NARA's Optical Disk Policy

There has been much discussion in the information community about the National Archives and Records Administration's (NARA) policy regarding the storage of information on optical disk. In response to an article that appeared in the June 15 issue of *Federal Computer Week* entitled, "NARA extends Non-Optical Policy," Trudy Huskamp Peterson, Acting Archivist of the United States, outlined three aspects of NARA's continuing reevaluation of its optical disk policy in a letter to the editor. She briefly described three developments in NARA's plan for an electronic archives of the 21st century:

- ❖ The Center for Electronic Records will soon formally announce that it will accession records in CD-ROM formats used by the Government Printing Office (GPO). With a limited number of formats, the Center believes it can manage the problem of converting the data as the format becomes obsolete.
- ❖ The Center is working to expand options for electronic data transfers to include file transfer over networks. This has a number of advantages for NARA and agencies, including the elimination of problems with incompatibility between the media used by the agencies and that used for storage at NARA. Electronic transfer will allow NARA to write directly to its storage medium without physically handling the magnetic tapes or other media currently received. This also means that the National Archives will not limit the storage devices agencies choose, as long as the open transfer standards are observed.
- ❖ This fall, the National Archives plans to release guidelines for the use of digital imaging and optical media storage technologies in the Federal Government. The report, which is based on fifteen in-depth case-studies, a review of industry trends and standards activities, addresses critical records management and archives issues that digital imaging and optical media applications should take into account.

Dr. Peterson also notes that this does not say that optical disks as an approved archival storage medium, rather it says that the "rapid obsolescence of new information technologies makes any designation as archival transitory." She then says that NARA believes that

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Ask Dr. Records

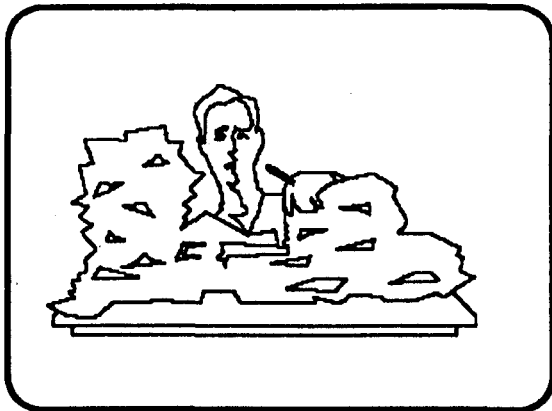
This is a brand new column for INFOACCESS. We asked Agency records managers to send us brief records management questions that could be answered in 25 words or less. These are the first questions submitted by EPA records managers, and the answers provided by Dr. Records.

Question:

According to 36 CFR 1222.48 (e), all data created for Government use are considered Federal records, but can the contractor keep a copy of records they turn over to us (Agency records managers)? If so, how do we ensure that the contractors retained copy does not end up in the wrong hands?

Answer:

Contractors may keep a copy of the records they turn over to the Agency. Those would not be Agency records but their own copies. If there is a problem with allowing access to any copies they retain, that should be covered in the contract or statement of work.



Question:

What is the impact/meaning of the National Archives and Records Administration (NARA) Final Rule from the Federal Register for May 28, 1992 (pp. 22331-22434) involving the Privacy Act and the transfer of records.

Answer:

The NARA rule concerns scheduling records and not transfer to the Federal records center. EPA is required to publish a notice in the Federal Register concerning each system of records covered by the Privacy Act. If EPA then sends a records disposition schedule (Form SF-115) to NARA to approve the disposition of those records, the Agency must provide the Privacy Act System number on the SF-115S. Under current procedures, the National Records Management Program (NRMP) is the only organization that sends NARA SF-115. If your program wants to schedule records from a Privacy Act system, notify the NRMP and we will locate the system number and include it on the SF-115.

Dr. Records had a few questions left over this month, and he is researching their answers for the next Ask Dr. Records column. Dr. Records is also interested in answering your questions, so please send them to Dr. Records in care of Mike Miller, IMSD, PM-211D; email box Miller.Michael-OIRM.

Have You Seen This GAO Publication?

In July, 1989, the United States General Accounting Office (GAO) published a report in response to requests from the House Government Operations Subcommittee on Government Information, Justice, and Agriculture and the Senate Governmental Affairs Subcommittee on Federal Services, Post Office, and Civil Service to examine various questions about the legality of senior agency officials removing federal records upon leaving office.

This report responds to the questions raised and presents additional information about the files of officials who could have been leaving office with a change of administrations. When leaving office, some cabinet members took documents related to official government business. In many cases, the former cabinet members included these documents in collections of "personal papers," which were later placed into public or private archives. Some collections included hundreds of thousands of items.

Are They Federal Records?

The report found that the legality of removing documents or papers, which is the subject of this report, largely depends on whether they are federal "records," federal "nonrecord materials," or "personal papers." Federal records are legally defined as documentary materials that 1) are made or received by an agency under Federal law or in the course of public business and 2) have been preserved or are appropriate for

Federal Records: Removal of Agency Documents by Senior Officials Upon Leaving Office

preservation as evidence of an agency's activities or because of the value of the information that they contain. Copies and other federal documentary materials that do not meet the criteria for records status are commonly referred to as nonrecord materials. Personal papers relate only to an individual's private affairs and not to agency business.

What Does the Law Say?

The Federal Records Act of 1950 and the Records Disposal Act of 1943 are two of the government's primary records management laws. Responsibility for records management oversight is shared by the National Archives and Records Administration (NARA); the General Services Administration (GSA); and the Office of Management and Budget (OMB). ***Individual agencies, however, remain primarily responsible for managing their own records.***

Several laws may relate to the removal of papers by agency officials. The Federal Records Act and the Records Disposal Act govern the removal of papers if they consist of federal records, but not if the documents consist of federal nonrecord materials or purely personal papers. The definition of records specifically excludes, among other things, "extra copies of documents preserved only for convenience or reference." Consequently, the records laws do not prohibit removing such copies.

Criminal laws also govern 1) the removal of federal documentary materials, generally excluding extra copies, and 2) the theft of federal documentary materials, including extra copies. In addition, most major federal agencies have rules or policies governing the removal of papers by agency officials.

Applying the Law

The applicability of the Federal Records and Disposal Acts to an official's removal of documents or papers depends upon whether or not the materials in question qualify as records under the definition provided in the Disposal Act. The Federal Records and Disposal Acts do not govern the removal of nonrecord materials, including extra copies of records made for convenience or reference, or personal papers. Aside from the exclusion for extra copies, the determination as to whether a document or paper is a record depends not on its status as an original or copy, but instead on whether it was made or received

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by an agency under federal law or in the course of official business, and is deemed appropriate for preservation. Senior agency officials who have agency permission can, therefore, legally take such nonrecord materials with them upon leaving office.

For Additional Information, please see:

EPA Ethics Advisory 89-2, *Disposition of Federal Records and Personal Papers*, January 18, 1989.

EPA Notice 88-1, *Safeguarding and Disposition of Official Records*, September 12, 1993.

EPA Records Management Technical Leaflet #3, *A Practical Guide to Personal Papers*, December 1992. EPA 220-F-92-019.

Federal Records Management: Laws and Regulations, National Archives and Records Administration, Office of Records Administration, 1993.

NARA Bulletin 93-2, *Proper Disposition of Federal Records and Personal Papers*, November 13, 1992.

Personal Papers of Executive Branch Officials: A Management Guide [Management Guide Series], National Archives and Records Administration, Office of Records Administration, 1992.

What Makes Papers Personal? [flyer] National Records Management Program, Information Access Branch, Office of Information Resources Management, August 1992. EPA 220-F-92-013.

We hope that you will find the information in this report useful in advising staff about their responsibilities for maintaining the integrity of EPA's records. If you have any questions regarding personal papers, please contact Michael L. Miller, Agency Records Officer, at (202) 260-5911, or on All-in-1 at Miller.Michael-OIRM. If you would like to obtain a copy of any of the publications listed above, please contact Joe Moeltner (contractor) at (202) 260-5272, or on All-in-1 at Moeltner.Joseph. ✻
Contributed by Joseph Moeltner (contractor), Records Management Support, NRMP.

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The main menu of the system offers access to the Receipt Log, Inventory Log, and Files Maintenance menus, and allows the user to search by disposition and records control numbers, transfer records between active and inactive status, and create reports. Les described a number of useful features available on the system, including:

- ✓ Mandatory data entry on many fields to ensure that appropriate information is recorded.
- ✓ A field to record an auditor's visit or review.
- ✓ String search capability.
- ✓ Description field that can be used in a variety of ways; OPPT uses it for tracking.
- ✓ Ability to reactivate files designated "inactive."

In response to a question about system capabilities, Les commented that it could be used with bar coding equipment, if some modifications were made to the program. He also said that OPPT will work with the Regional records managers to improve the system. They are planning to look at the possibility of integrating the automated SF-135 system developed by AMS into the automated document tracking system.

Concluding the Tour and Demo

Georgianne concluded the tour and demonstration by talking about OPPT's plans to enhance its image processing system by including the material from the dockets, and incorporating materials from other sections of TSCA. Georgianne also talked about her preparations for a briefing on records management for Mark Greenwood, Director of OPPT. ✻

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. The INFOACCESS staff would like to encourage all records management staff at the Agency to share news and information about current projects with the INFOACCESS readers. Anyone with contributions for this column can contact Mary Hoffman (contractor), Network Coordinator, at (202) 260-7762 or at Hoffman.Mary on All-in-1.

Region III's RM Activities

Region III has developed a workgroup to create a records management manual. The manual will be a supplement to the Agency's Records Management manual and will describe records management procedures pertaining to the Region III office. Also, the Region III records management directive is being reviewed. It should be approved by mid-September.

Beginning in FY 94, Region III's records management staff will begin systematic records management training for secretarial staff. One division will be scheduled each month until all divisions have been covered. The training course will cover cleanup procedures, storing and retrieving records at the FRC, the Region's alternate storage, and other records management procedures.

Cleaning & Dusting in Region 5

Records management staff in Region 5 have instituted a new practice of cleaning and dusting all boxes of records entering the building from commercial storage. A recent monitoring of air quality in the records work area on the 12th floor showed an extremely high amount of dust. Staff determined that the dust was probably related to boxes that had been shipped from a commercial storage facility to the Regional office. To resolve this situation, the staff took all the boxes that had come from commercial storage to the loading dock. There the staff dusted and vacuumed all the boxes, and their contents, removing as much dust as possible, and then repacked the material into FRC boxes. The boxes were then taken back to the 12th floor work area. Later in the week, the work area was completely dusted and the carpets were cleaned. The monitors were used again to check the dust

level, and it was found to be acceptable.

Since then, when new boxes arrive from the commercial storage facility, the documents are removed from the boxes on the loading dock, dusted and vacuumed, and then taken to the 12th floor.

Imaging in Region 6

Nancy Yarberry shared some insights into Region 6's imaging activities during a recent Regional records management teleconference. According to Nancy, their grant system has been loaded onto optical disk, and staff are starting alpha and beta training. They have begun to meet with the permits staff to work out the details for adding the permit information to the system. Some of the issues they are discussing include the disposition of paper records after the conversion, management of the optical disks, indexing and scanning.

P-Mail in Region 9

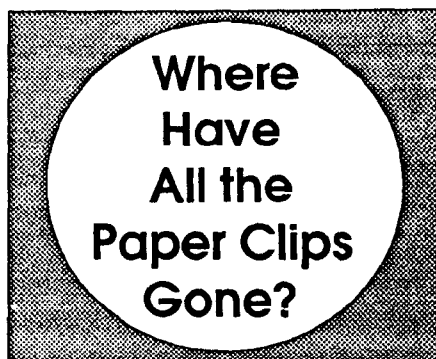
Yvonne Pederson has been distributing information about records management issues via electronic mail to Regional staff on a monthly basis. In her first message, Yvonne introduced herself and the Regional records program. Subsequent messages have discussed the unauthorized removal or destruction of records, how to use the Federal records center, records held by contractors and their responsibilities, and the newly established Records Management Task Force and the EPA Records Management Program. Yvonne is working on her next message, which will cover file cut-offs. This has been a successful effort for Yvonne, inspiring numerous responses and questions from Regional staff.

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In the three spare minutes I had last month, I began considering some of the "Mysteries of Life." You know... Where have all the paper clips gone? Why does the copy machine go belly-up 15 minutes before the giant project is completed? Why is the missing file in the box at the bottom of the stack (and of course in the last of the 5 stacks)? Where are the missing records carts, step stools, etc?

For over 3 months I've had a records cart missing in action. What is someone doing with a records cart? Have they taken the wire baskets home to keep a new litter of puppies? Is the cart being used as a portable plant stand? Maybe there is a worm hole that only appears when a cart is left alone. It appears, transports the cart to a different world and in 200 years a space explorer will discover the "Land of the Missing Office Equipment."

Has anyone ever found a missing file in the top box of the stack? Of course there is something worse than looking through a bunch of boxes before finding a missing file. Its the person who does the V-8 slap to the head and says "Oh, I remember now, we put that file in the boss' safe/secretary's desk/other hiding place for safekeeping." You grin and he walks off happy that the missing file has been found. You



are in the meantime sitting in a circle of boxes, all open, grinning because you are imagining incredibly painful methods of torture!

Anthropomorphism or not, copy machines know when the current project is critical. Do they break at the beginning of a project when you have a half of a chance to recover? Nooo, they throw a tantrum when you are minutes away from being complete. Maybe they know that you are congratulating yourself on another disaster averted. Under the listing of 'smug' in the dictionary is a picture of a copy machine with a paper jam.

Disappearing paper clips are not a mystery. I can explain disappearing paper clips and excess hangers. Paper clips are a pre-mutated form of a wire hanger! Paper clips secret

themselves away in pockets, hems of skirts and pants, etc. Then when you reach home and put your clothes in the closet or hamper, they slither out. Like lemmings they are genetically programmed, only paper clips collect in the darkest corner of your closet. When the number of paper clips reaches the critical level, they begin to mutate. They meld together and form a hanger. If you open your closet door during the process, you disrupt it and a bent, mangled hanger is formed. That's why you never can find a paper clip when you need it and why there are always hangers on the floor in the back of your closet.

A peer reviewed this article and had some comments. So, more on the paper clip/hanger mystery!

There certainly must be some relationship between paper clips and hangers. Down in my dank basement where I have the washer, I can start out with no paper clips visible but with enough hangers for all the clothes I'm going to wash. Somehow... mysteriously...by the time I'm pulling stuff out to hang up to dry, I have too few hangers but a pile of paper clips at the bottom of the interior wash tub. Transcycle mutation? Rinsecycle mutation?

I vote for rinsecycle mutation. ✱

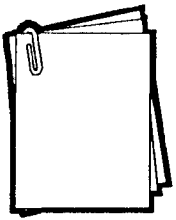
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Training Region 10 Staff

Fern Honore (contractor) has been busy in the Region 10 office in Seattle training program staff about "how to create a complete record." Each of her training sessions is tailored to a specific audience, each with unique records, and each includes a presentation on how to document policy, procedure and decision making in the office. Fern's advice about determining if

something is a record or not, is that "if you act on it, it is a record." She goes on to explain that most of what crosses a person's desk is technical reference material which does not have to be kept.

So far she has briefed staff in the Office of the Assistant Regional Administrator, the Office of Policy Planning & Evaluation, the Comptroller's Office, and the Administrative Management Branch. Fern always tries to include the file custodians in her briefings, the filing experts in each office.



General Records Schedules Transmittal #6

The National Records Management Program (NRMP) recently received copies of *General Records Schedules Transmittal #6*, dated May 17, 1993, and is distributing it to agency records managers for incorporation into their GRS binders.

The National Archives and Records Administration issues the GRS to provide disposal authorization for records common to several or all agencies of the Federal government. GRS items cover an estimated one-third of the total volume of records created by Federal agencies. Agency records managers should use the GRS to supplement EPA's own records schedules in determining the dispositions for a wide range of administrative records.

A complete set of the GRS includes five earlier transmittals plus the most recent one, #6.

- ❖ **Transmittal No.1** (August 10, 1988) distributed the basic set of GRS chapters now in use. You can identify this revised version because its pages are dated June 1988 and it has a blue cover.
- ❖ **Transmittal #2** (October 30, 1989) included numerous corrections to the Transmittal #1 package.
- ❖ **Transmittal #3** (February 22, 1991) included several modifications to existing disposal authorizations and a new item covering passports.
- ❖ **Transmittal #4** (April 24, 1992) discussed a change to GRS 2.
- ❖ **Transmittal #5** (July 9, 1992) added a revised page that was inadvertently omitted from Transmittal #4.
- ❖ **Transmittal #6** (May 17, 1993) contains a revision of the General Introduction and makes additions, revisions, and corrections to several schedules and to the indexes.

Additional copies of all of the transmittals can be obtained from your local Federal Records Center, or by calling Joe Moeltner (contractor) at (202) 260-5272.

Contact Mike Miller, Agency Records Officer, at (202) 260-5911, with any questions concerning the transmittals or specific General Records Schedule items. ☼

GRS on Disk

The General Records Schedules are now available on disk from Joe Moeltner (contractor), Headquarters Records Support. If you are interested in obtaining copies of the GRS on disk, contact Joe at (202) 260-5272.

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national and international digital information technology standards, which provide update migration paths to new media, devices, and software, offer the most effective long-term solution to technology obsolescence.

NARA is actively participating in the work of several ANSI and ISO standards groups that are addressing digital media and related information technology issues. Establishment of the standards will be neither easy nor swift, but NARA is committed to their development, adoption and use. ☼

