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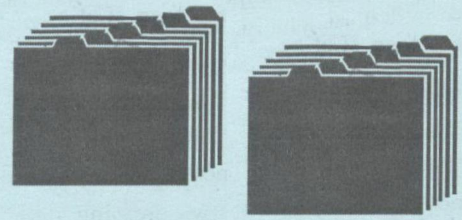

Transition to Records Management Phase II

by Michael L. Miller, Agency Records Officer

During FY94, the Agency's records management program began a transition to the next level of achievement, a transition that will carry over to FY95. Over the past three years, we've developed tools and pilot projects to manage our paper records more effectively. During the transition to Phase II, we will start systematically implementing those improvements, while at the same time beginning to develop tools and pilot projects to manage our records electronically.

FY94 saw a number of accomplishments that laid the ground work for the transition. At the national level, the National Records Management Program (NRMP) completed a number of initiatives including:

- Initial drafts of all records disposition schedules.
- A guide for conducting the records inventory.
- A revised chapter on records management for the IRM Manual.
- A draft Agency file plan.
- A plan for establishing recordkeeping and case file management requirements.
- An analysis of electronic records policy requirements.

At the same time, Headquarters Programs and Regions:

- Increased number of self-sufficient programs.
- Increased the number of active programs, especially in Headquarters.
- Piloted inventory projects in OARM and Cincinnati.
- Developed program-specific records management manuals and file plans.
- Initiated program-specific training for records liaisons.
- Retired record volumes of records to Federal records centers.

So what are our primary goals for FY95? There are four areas where everyone must focus in FY95:

- Initiating the Agency-wide inventory.
- Establishing the recordkeeping requirements program.
- Developing a policy on electronic records.
- Providing additional records management training.

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The goals were selected because they address the principal records management challenges facing our Agency in the next few years. Let's examine each goal and the reasons for it.

Why do we need to expend resources on an Agency-wide inventory? There are two pressing reasons. First, Headquarters Programs (and some Regions as well) are moving and records constitute a lot of what we move. The staff need assistance in preparing for those moves, both to identify what they shouldn't move, and to organize what they should. From another perspective, if the Agency is to resolve many of its most pressing records management problems, it needs a detailed understanding of its information resources and how they relate to one another. The answer to both problems is a complete inventory of Agency records. Why? Because we can't manage what we don't understand.

The goals were selected because they address the principal records management challenges facing our Agency in the next few years.

What practical function do recordkeeping requirements serve? On one hand they help us determine what we need to move when we move. From a different perspective, we are demanding more from our records than ever before. Time sensitive decision making, public access, litigation all place greater emphasis on the old records management axiom—the right information, to the right person, at the right time. To simplify this process, the Agency needs to determine what records are necessary to meet all of its obligations and concentrate its efforts on managing those as effectively as possible. Hence the emphasis on recordkeeping requirements in FY95. Recordkeeping requirements will allow us to identify what records we need to manage, and organize those records for maximum effectiveness.

Are electronic records an important records management issue? In the minds of many managers, electronic records are the only records management issue. In management briefings, electronic records, and more particularly electronic mail, are the hot issues. Staff are looking for more up-to-date policy on how to manage electronic records. Moreover, the Agency has made a pledge to use less paper. The records management community must support that commitment by enabling staff to meet their recordkeeping needs electronically whenever possible. That is not as simple as it may sound. At this point we have neither the policy and

Why do we need a complete inventory of Agency records?

■ ■ ■

Because we can't manage what we don't understand.

INFO ACCESS

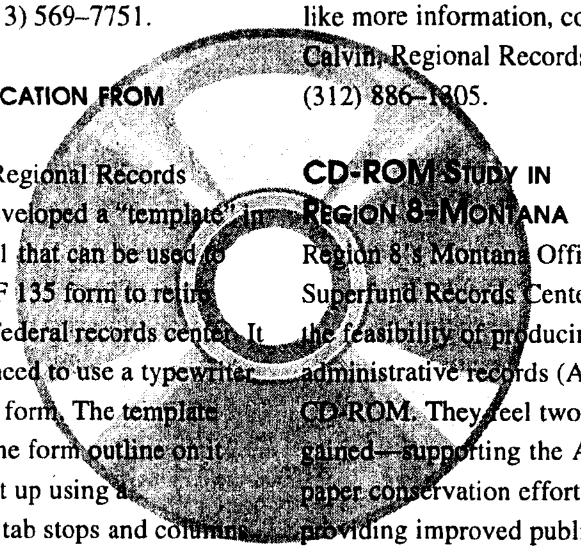
INFO ACCESS, a forum to provide information and report on progress in information management across the Agency, is produced by the Information Access Branch (IAB) of the Information Management and Services Division (IMSD), Washington, DC, under the direction of Michael L. Miller, National Records Management Program Manager. Please send comments and suggestions to: Manker R. Harris (contractor), Network Coordinator, 3404, EPA National Records Management Program, 401 M Street, SW, Washington, DC 20460. Telephone: (202) 260–5272. Electronic mail: Harris.Manker.

TECHNOLOGY CORNER

Technology corner is an ongoing attempt to provide records managers with information about how other programs are utilizing technology to better manage their records and provide improved access to information. Any mention of trade names, products, or services does not convey, and should not be interpreted as conveying, official EPA approval, endorsement, or recommendation.

RECORDS DISPOSITION SCHEDULES IN READY REFERENCE FORMAT

Cincinnati has converted the records disposition schedules to Ready Reference format. This is the same format used for the "Greenwire" on the Agency backbone. There is a keyword search capability for the index. Once you find the schedule in the index, you only need to hit "enter" and the schedule comes up. Anyone interested in getting copies should contact Sue Mercurio at (513) 569–7751.



SF 135 APPLICATION FROM REGION 5

The Region 5 Regional Records Program has developed a "template" in WordPerfect 5.1 that can be used to complete the SF 135 form to retire records to the Federal records center. It eliminates the need to use a typewriter to complete the form. The template does not have the form outline on it (yet) but it is set up using a combination of tab stops and columns to fill in the appropriate blanks. Some imagination needs to be used until the user is familiar with how the form looks and what is on the screen. The "template" is available to other Regions. If you are interested, or would like more information, contact Lynn Calvin, Regional Records Officer, at (312) 886–1805.

CD-ROM STUDY IN REGION 8–MONTANA

Region 8's Montana Office and the Superfund Records Center are studying the feasibility of producing their administrative records (AR) indexes on CD-ROM. They feel two goals can be gained—supporting the Agency's paper conservation efforts and providing improved public access to the record. While working on their analysis, they found they produce almost 11,400 pages per set of AR indexes and eight sets for repositories for a whopping total of 91,000 pages. In addition to the paper conservation issue, users of the ARs at the repositories are often frustrated because the sheer volume of materials makes it difficult to locate what they want.

In another effort to provide better access to the AR, the Center will be providing a test copy of the Inmagic Plus AR databases on Bernoulli cartridges to one of the repositories. The repository librarian had asked to

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Transition

procedures nor the hardware and software to meet all Federal and Agency requirements electronically.

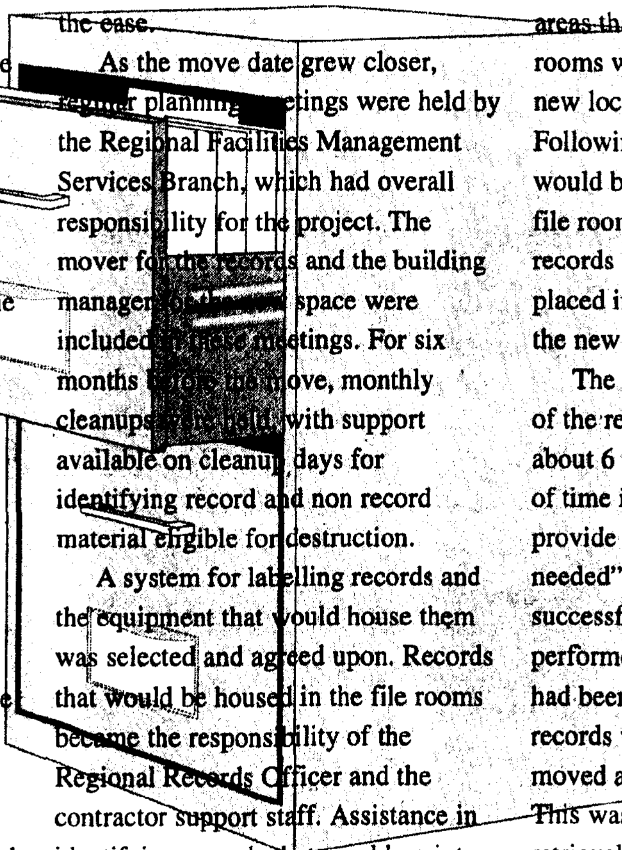
Finally, improving records management means raising the level of records management awareness among Agency staff and increasing the level of technical expertise among records managers. This translates into training for records managers and staff. Two examples of program-specific training are Cincinnati's records management awareness training for scientists and OPPE's series of records management awareness training sessions for staff. To help records liaison officers improve their skills, the NRMP plans to develop expanded records management training opportunities in FY95.

The transition will not happen over night. The challenge is to do it in the next three years. But the pieces are now in place to make the jump to the next level. With your continued cooperation and innovative approaches to the problems we face, we can do it. ■

REGION 5 ORC RECORDS MOVE

When Region 5 recently moved its Office of Regional Counsel (ORC), the relocation included moving almost 3,400 cubic feet of records. This article provides a summary of what went into a "smooth move" in Region 5.

Approximately two years ago, Region 5 began planning for the move of its Office of Regional Counsel (ORC) to new space. One important element in the planning was the inclusion of records management requirements in the planning for the space, including the requirement in the solicitation for space for appropriate file room space with reinforced flooring. Lynn Calvin, Regional Records Officer, and other records managers were an integral part of the process.



In the old space, there were four file rooms and several hundred file cabinets full of records. The requirement was to plan the new space to house these records, including conducting an inventory of existing records and equipment so as to understand the scope of the project and deciding which equipment to move. The Regional Law Library was made a part of the project, with approximately 1500 feet of library material to be moved and reshelved in the new location.

PREPARATION PHASE

The records program worked with the architect to develop layouts of the new file rooms and provided technical information on the loaded weight of filing equipment. Further planning involved assigning files to the file rooms (on two different floors) according to the type of cases and the locations of the attorneys assigned to the case.

As the move date grew closer, regular planning meetings were held by the Regional Facilities Management Services Branch, which had overall responsibility for the project. The mover for the records and the building management for the new space were included in these meetings. For six months before the move, monthly cleanups were held, with support available on cleanup days for identifying record and non record material eligible for destruction.

A system for labelling records and the equipment that would house them was selected and agreed upon. Records that would be housed in the file rooms became the responsibility of the Regional Records Officer and the contractor support staff. Assistance in identifying records that would go into perimeter or common area cabinets was provided.

Meetings were held with every section of ORC explaining what their responsibilities would be to ensure that their records arrived in the right location. A longer range plan to move less than active records from the common areas to the file rooms was developed.

COUNTDOWN TO MOVE DAY

About two weeks before the move began, records in the file rooms were labelled for their new location, and that information enabled the movers to properly pack and unpack those records. Records from the common areas that were to be put into the file rooms were assigned shelf space in the new locations and labelled accordingly. Following the move, those records would be interfiled with the existing file room records. Common area records were packed, moved, and placed in the appropriate cabinets in the new location.

The total move, from the beginning of the records pre-move, consumed about 6 weeks. Because of the length of time involved, the plan had to provide for access to records on an "as needed" basis. This was carried out successfully with several retrievals performed during the move. ORC staff had been instructed to keep current records with them and have them moved as part of their office contents. This was done to minimize the retrievals during the move.

The move, which included almost 3,400 cubic feet of records, was successfully completed on schedule. Records in the file rooms were interfiled at the case level. Contractor staffing is in place for the Superfund files and ORC is recruiting for a new EPA records staff person to handle non-Superfund files.

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ELECTRONIC DOCKET COMMENTS

The Office of Air & Radiation's Docket & Information Center (Air Docket) was the first Program Docket to publish and make available electronically, via the Internet, the U.S. Environmental Protection Agency's proposed Indian Tribal rule. The Air Docket is participating in an EPA test pilot project to accept electronic comments on selected Agency proposed rules published in the Federal Register.

The goals of the pilot, which will run until January, are to determine the feasibility of accepting comments to Agency rulemakings electronically and to develop procedures for doing so efficiently and effectively. The motivating force behind this effort is the Administration's and the Agency's ever-increasing effort to expand public access to Agency information and to encourage a wider, more inclusive participation in the promulgation process.

The Office of the General Counsel, the Headquarters Docket Work Group, the Agency's National Records Management Program and the Office of Administration & Resources Management (OARM) are working with John Richards, Federal Register Staff, (Office of Prevention, Pesticides and Toxic Substances) to develop the necessary procedures to ensure that the electronic filing of comments does not affect the integrity of the Docket's records.

The proposed rule appeared in the *Federal Register* on Thursday, August 25, 1994, and the comment period extends for ninety days until November 23, 1994. Instruction on how to submit comments electronically to this proposed rule are contained within the Federal Register notice. For further technical information on this proposal, please contact Tina Parker (contractor) at (202) 260-6584. ■

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have the AR removed because no one used the microfilm. The librarian felt the film was not used because the paper indexes were too cumbersome. The repository does, however, have Inmagic software and access to a Bernoulli box and feels that providing electronic indexes to the microfilm will provide much better service to their users. For more information contact Melody Ballard (contractor) at (406) 449–5728.

BAR CODING AND INDEXING IN REGION 7

Region 7 reports that it has purchased a bar coding and document indexing system named Image Trax. The Region will be using the system to control computer hardware and software inventory, circulation control in the Information Resource Center, folder check-in and check-out in the Regional Records Center, and document indexing and control of folder access in the Waste Management Records Center. Other uses for the bar coding and indexing system will also be explored.

The Waste Management Records Center will pilot the system with RCRA and Superfund files. Currently, RCRA files are on Lotus 1-2-3 and Superfund Administrative Record indexes in dBase. Folders and documents will be bar coded and indexed for folder access control and document retrieval. The indexing system will be kept simple initially, adding other fields as needed. A color bar printer was also purchased to make end tab bar codes and folder labels for the RCRA and Superfund folders. Currently, the Waste Management Records Center is in the development stage for converting the RCRA Lotus files to the Image Trax system. For further information contact Sherry Hays (contractor) at (913) 551–7644.

What Do We Do With Our Electronic Records?

by Lisa Jenkins, Records Liaison Officer, OSWER

This question is echoing through the halls, not only of EPA but in other Federal agencies these days. Nobody wants to be caught in the situation of the White House, where hard disks were seized and all the backup tapes are being scrutinized. Although an Agency Work Group on Electronic Records Management is in the works, individual programs will need to develop specific policies and procedures that address the specific needs of the records created by the programs and provide sufficient detail to be implemented.

OSWER has responded by creating an OSWER Electronic Records Management Work Group comprised of Records Management Contacts through OSWER's offices and LAN Administrators. The theory behind the makeup of the group is that records managers know the legal requirements, the current paper processes, and many of the informational needs for OSWER's information both inside and outside the program, but they lack the technical skills to implement electronic solutions. LAN Administrators know the ins and outs of how the LANs work and can work, but lack the records management training. It is only in bringing together the mix of these skills, that real, workable solutions will be found.

Of course, people in different professions almost always have their own language. Records managers know records-speak and LAN Administrators know systems-speak. So one of the first things the work group did was to review some key (although ambiguous) terms such as record, electronic record and archive. We also agreed that, for the purposes of the work group, E-mail includes both All-In-One and the various LAN Mail systems currently used at EPA (e.g., WordPerfect Office, cc:Mail, and Lotus Notes). After all, some day we will all be in an integrated E-mail environment and the distinctions will become unnecessary.

The first goal of the work group is to come up with a way to file electronic records that fits with the way we file paper records and makes at least the permanent electronic text records able to be archived electronically. The next goal will be to come up with ways to successfully implement such a plan. Some ideas being tossed around include:

1) Allowing flexibility re: users' working files, when users will identify electronic documents by record series (at creation or at file break), and the original document format.
2) Handling permanent records differently from temporary records, and possibly handling short-term temporary records differently from long-term temporary records.
3) Not using E-mail systems as records management systems, but as mechanisms of delivery only. Capturing E-mail records electronically, at least for an interim OSWER policy, would be a matter of downloading the sent or received message with its associated transmission data to a diskette, hard disk or LAN subdirectory for immediate or later filing with records of the same series and file break.
4) Initiating a central database for collecting the ASCII versions of permanent records to be put to tape for archiving (perhaps connected to another database that collects the records in another format for use on the Gopher server, VABs server or electronic collections of specific OSWER record collections).
5) Storing temporary records by record series on hard disk or on diskette in original format at personal work stations, at a central area for each Office, Division or Branch, or at the FRC.

Whatever we decide to do, we know a huge amount of training will be necessary, and not everyone will opt for storing any of their records electronically.

Our initial meetings were held on September 20 and 21 and were well attended by all the right people. The challenges are great, but we have made a good start at addressing the issue of electronic record filing. ■

NEWS FROM NARA

WASHINGTON NATIONAL RECORDS CENTER TRAINING

The Washington National Records Center (WNRC) is offering several workshops open to anyone working in records retirement and retrieval. The workshop explains procedures for retiring records to and retrieving them from the WNRC. It includes a tour of the Center, some practice exercises in completing forms, and a demonstration of how to properly prepare cartons for shipment. Classes are from 9:00 to 12:00 and are free. The WNRC also offers other classes for a fee.

OFFICE OF RECORDS ADMINISTRATION TRAINING

NARA's Office of Records Administration has announced its training schedule for FY95. The schedule includes both basic and advanced records management courses. Classes are from one to three days in length and cost between $140 and $420. Anyone with records management responsibilities should take the three basic courses: Introduction to Records Management, Files Improvement, and Records Disposition.

News From NARA continued on page 8

RECORDFACTS UPDATE

The Summer issue of the National Archives and Records Administration's *RECORDFACTS UPDATE* is out, and its available in both hard copy and electronic formats. The issue includes a number of interesting articles:

- NARA RACO Conference June 1994 (detailed writeups if you weren't able to attend)
- Guidelines on Moving
- NARA's cleanup campaign
- NARA's GOPHER server on the Internet
- Being able to get information fax-on-request using your fax machine.
- The move to the new Archives II in College Park, MD
- Special Interest Group on CD-ROM and Technology Applications (SIGCAT)
- Government Historians
- NARA's calendar of upcoming events.

Lisa Jenkins (OSWER) discovered it on the Internet, pulled it off the National Archives Gopher, and distributed it to many records managers via All-in-1. Lisa said she can access it without any fancy PC-specific hardware or software (no TCP/IP address). Getting it from the gopher was as easy as mailing it to her Internet address. The Internet address for *RECORDFACTS UPDATE* is: GOPHER:// GOPHER.NARA.GOV/.

The Archives Gopher is set up to provide "Information for Archivists and Records Managers"— "Federal Records Management Information" on "Publications", "Services", "Code of Federal Regulations Relating to Records Management", " and the new "Records Management User's Group"—the latter being an interagency work group looking primarily at automating records management (with the hope we can do it cheaper, faster, and smarter by sharing information across agencies as we do it). It's worth a look. Anyone at Headquarters with access to the LAN (VABS) automax menus should be able to get on the gopher servers. Regional folks should check with their IRM staff.

For either a hard copy or electronic copy via All-in-1, contact Manker R. Harris (contractor) at 202-260-5272 or HARRIS.MANKER on All-in-1.

RECORDS MANAGEMENT COUNCIL NEWS

The August 23, 1994, Records Management Council meeting, led by Mike Miller of the Information Management and Services Division (IMSD), was well attended. The agenda covered several important projects dealing with records management at EPA.

OARM INVENTORY

Jim Baca (OARM) began the meeting by describing the inventory process in OARM and sharing some things that he has learned along the way. In particular, he advised stressing the time and money savings with office and division directors, but focusing on the benefit of increased productivity with branch chiefs. Vicki Betton (contractor), who has been working on the OARM inventory with Jim, emphasized the need to get management involved at the outset. Both Vicki and Jim stressed the fact that their draft inventory form continued to evolve throughout the process.

RECORDS SCHEDULES

Via teleconference, Sandy York (contractor) pointed out the key information that must be used to determine how the new disposition schedules can be used. Schedules currently fall into three classes:

- Schedules that list a General Records Schedule number, or that have been previously approved by the National Archives and Records Administration (NARA), may be used for both retirement and destruction of records.
- Schedules bearing NARA schedule numbers beginning *NC1-412-94-* have not received final approval from NARA and therefore can only be used to retire records to the FRC.
- Schedules with numbers that are "Pending" cannot be used for retirement or destruction.

Sandy also discussed paper and electronic finding aids that can cross-reference old schedule numbers with the new ones. (This information was provided in the August issue of *INFO ACCESS*.)

OTHER BUSINESS

Mike Miller presented a draft of the outline for the IMSD-sponsored Recordkeeping Requirements Study. This draft was developed in response to the general requirements NARA proposed for the Agency. Mike has contacted the Office of the Inspector General and the Underground Storage Tanks program as possible test programs.

Meeting participants next discussed the ongoing issues related to the dockets, including how dockets will be accommodated in the new building, ways of measuring customer satisfaction, and electronic enhancement.

Mike Miller gave the group an update on IMSD work including comments on NARA's proposed regulations on vital records, which were signed by Al Pesachowitz (Director OIRM). Mike agreed to look into the use of recycled paper and its suitability for long-term records. (See related item on page 9.) Lisa Jenkins (OSWER) reported on the new NARA workgroup on automating records management. Deborah Ross (OW) reported on the outcomes of Enforcement's reorganization and the transfer of records to the new OECA. ■

News from Nara from page 7

NEW COST AVOIDANCE FIGURES AVAILABLE.

NARA has released its new estimates of the cost avoidance in space and equipment that may be achieved through transfers of records to the Federal records centers (FRCs). This year the cost of storing a cubic foot of records in an FRC is approximately $1.62 ($1.50 for storage space and $0.12 for equipment). The national average for storing a cubic foot of records stored in office space is about $23.04 ($22.45 for space and $0.59 for filing equipment). The difference is a $21.42 savings for the taxpayer.

For more information on any of these items, contact Manker R. Harris (contractor) at (202) 260–5272 or HARRIS.MANKER on All-in-1. ■

Around The Records Network

Office of Regional Counsel Records

One area of growth in Regional records management has been Office of Regional Counsel (ORC) records. Regions 1, 4, 5, and 6 now have special file rooms for ORC records, and other Regions may as well.

Procedures and Manuals Under Development

Region 1 reports that it is developing procedures for processing NPDES Purge and NPR (no permit required) files to add to the NPDES Records Center Procedures Manual, currently in draft. OSWER is developing a File Structure and Guidance Manual for its Hazardous Site Evaluation Division. The work is part of OSWER's program to systematically develop file plans for its organizations. Region 4 has developed draft manuals for the Underground Injection Control Program and the pesticides Section of the Pesticides & Toxic Substances Branch.

OEJ Preliminary Inventory Report

The Office of Administration and Resources Management (OARM) has completed its preliminary inventory report for the Office of Environmental Justice (OEJ). The report is in four sections: OEJ inventory summary, OEJ records series, pertinent records disposition schedules, and recommendations. The report stands as a model for future inventory reports.

OW and OECA Enforcement Work Group

The joint Office of Water and Office of Enforcement and Compliance Assurance Records Management work Group successfully completed its work for the OECA reorganization. Congratulations to all involved.

Headquarters Update

Recycled Paper

According to EPA's Waste Prevention and Recycling Coordinator, the new 100% recycled copier paper used at EPA has high archival qualities and a 200 year shelf life. The National Records Management Program is following up on the matter to ensure that the paper will meet all records management requirements.

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Benefits for All

Several ongoing benefits to this process are being realized. The positive reaction of ORC staff to a "new look" to their file rooms has been immediate, commented upon to visitors, and appreciated as a valuable addition to their ability to have accurate records readily available.

But it is the ORC staff who should get the most credit for two other improvements. Formerly, and indeed during the move, boxes would arrive in the file room with the contents identified only as "Miscellaneous." Considerable time was consumed in identifying what those records were. With the move, ORC staff have accepted the process of identifying the records being sent to the file rooms, resulting in more efficient filing. Identification forms and the availability of folder labels have simplified this process for busy legal staff.

The ORC staff have also accepted a new charge-out system for their files. Currently the file rooms are not staffed full-time, leaving the opportunity for records to be removed or replaced without records staff being aware of what has happened. The introduction and acceptance of a charge-out system has eased this problem considerably, and ORC staff realize the benefits of this procedure.

For additional information, contact either Lynn Calvin at (312) 886–1305 or Gerry Hegel (contractor) at (312) 353–1481. ■

ASK DR. RECORDS

The questions to Dr. Records seem to come in clusters. This month's questions all related to vital records and come from Region 1 and Cincinnati.

Q.

Should we include "expensive" records in our vital records program? Expensive records include those which are the result of large expenditures of time and other valuable resources, as well as those that could be recreated, but only at considerable cost. Typically, these would be research and development records.

A.

The short answer is no. In Federal agencies there are only two real types of vital records—emergency operations and rights and interests. However, there is a longer answer that deserves consideration, and it involves recordkeeping requirements. Although the "expensive" records may not qualify as vital records, they may well merit special protection or processing to protect the government's investment. Such special handling might include duplication, off site storage, fire resistant file cabinets, etc. The question here is one of risk, and records officers should help program staff identify those records that merit special protection.

Q.

I have a program that claims it has no vital records. How do I document this for "the record?"

A.

I would suggest having a form for the program manager to sign. A simple check-off is fine. The program manager (division director or laboratory director) would sign the form. The choices would be that the program has no vital records or that the program does and the series would be listed. Copies of the form would then be kept on file.

Q.

The Official Personnel File (OPF) protects the rights and interests of Federal employees. Are they vital records?

A.

This question was so good that I had to call on outside assistance, and even then there was no clear answer. The principle to be applied is this. The OPF contains information that would be considered vital to protecting the rights and interests of the employee. Such information might be the person's length of service, pay grade, date of promotion, and other pieces of information. The question is whether sufficient information is duplicated in other files, including automated ones such as EPAYS, to protect the rights and interests of the individual. The rule is not that the entire file must be duplicated but that the important information be protected and available. Based on this principle, it does not seem that the OPF would have to be duplicated in hard copy as a vital record.

TIP OF THE HAT

We welcome the following people to the Records Management Network:

Charlotte Bercegeay, ORD, Air and Energy Engineering Research Laboratory, RTP

Susan Auby, Strategic Planning and Management Division, OPPE

WHAT RECORDS LIAISONS DO ALL DAY

Unfortunately, program managers often underestimate the amount of time and the appropriate grade level for records liaison officers (RLOs). The reason is they frequently don't appreciate what the duties of the RLO entail. Many managers see records management as developing filing systems and taking care of records retirement. At some levels those are the main responsibilities, but each AAship at Headquarters, each Regional office, and each facility such as an Office of Research and Development Laboratory needs an RLO with sufficient time and skills to manage the records program. Generally this equates to a GS 11-13 who spends all or most of his/her time on records management. In larger organizations, the RLO will be assisted by a network of records liaisons from each of the major organizational units.

What could possibly occupy a person at that grade level full time? The importance of the records manager becomes clearer if you look at the four basic purposes records serve:

1) Administration and management of the program—Accomplishing the mission.
2) Evidence (legal and otherwise) of actions taken—Proof that we did what we said we did in accomplishing the mission.
3) Program accountability—Were the actions taken legal and appropriate.
4) Corporate memory—How and why we did what we did.

The responsibility of the records manager to make sure that the records necessary to meet those four needs are created, maintained, and ultimately either destroyed or preserved in the National Archives. That means having a broad understanding of the legal mandates for records, Agency and Federal audit procedures, and the Agency's business and documentation processes. This is in addition to a technical knowledge of records management. Whereas the prime function of the records manager was once seen as maintaining economy and efficiency in managing records, the key functions now are protecting the Agency from vulnerabilities caused by poor recordkeeping and identifying and making available the right information to the right person(s) at the right time.

To get a flavor of what that means, let's follow the RLO's duties through the life cycle of a new records series.

RECORDS CREATION

In records creation the RLO should work with program staff, legal staff, and the Inspector General's Office to establish recordkeeping requirements so that appropriate documentation is generated to meet all programmatic, legal, audit, and long-term purposes. The RLO should also be involved in the planning and development of the information systems (manual or automated) to ensure that the records created will meet Federal and Agency requirements.

RECORDS MAINTENANCE

The RLO will be involved in analyzing and developing filing and indexing systems for the records. The system selected must allow for a complete record to cover all legal, audit, and administrative needs; a concise record to maximize economy and efficiency; and a well planned system to allow for efficient retrieval of information when needed. The RLO develops policy and procedures for managing the records throughout their active life.

RECORDS DISPOSITION

The RLO works with staff to determine the proper retention and disposition for the series, and prepares the records disposition schedule. The RLO must make sure that all potential needs both inside and outside the program are considered, and that the disposition meets all legal and audit requirements.

To carry out these tasks, the RLO must be able to:

- Conduct research and analysis
- Draft policy and procedures
- Conduct training and briefings
- Interact effectively with technical staff
- Maintain a high level of technical expertise in both records management and the programs for which the RLO is responsible.

Even if a program chooses to contract out for some of the expertise, the program manager for the Agency will have to have these skills and some technical expertise as well, if he or she is to effectively manage a records management contract and carry out those portions of the program which cannot be contracted out (e.g., policy development).

Does anyone still think it's not a full time job! ■

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Environmental Protection Agency
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