Records Management Self Evaluation Guide

EPA 220-B-97-002
June 2001

Contents

Introduction

The National Archives and Records Administration (NARA) developed a self-evaluation guide for all Federal agencies to monitor their records management programs. This EPA National Records Management Program (NRMP) Tool Kit is based on that publication and is provided to assist EPA programs and offices implement the Federal requirement to conduct self-evaluations as outlined in NARA records management regulations (36 CFR 1220.42).

Using this Self-evaluation Tool Kit will assist EPA programs and offices:

- Make a preliminary assessment of the status of their records management programs.
- Identify major problems.
- Set priorities for program improvements.
- Assist in the development of their own comprehensive records management programs.

Other NARA and NRMP publications provide additional details regarding records creation, maintenance, and disposition policies and procedures. Relevant publications are available from the NRMP Records Management Collection.

Although this Tool Kit provides a framework for a general evaluation of a records management program, programs that wish to conduct a more in-depth review may add more specific questions based on other records management publications. Programs may also modify or add questions to accommodate specialized records and recordkeeping practices. No guide developed for agency-wide use can replace audit or evaluation activities tailored to the unique organization and operations of each program.

This Tool Kit is divided into six broad sections. Programs may use the entire Tool Kit to conduct a comprehensive program review or select sections to focus on specific areas, such as records disposition or files maintenance. The Tool Kit consists of a series of questions to be answered either "yes" or "no." A "yes" answer indicates compliance with NARA records management regulations and recommended practices.

The term "records liaisons" includes EPA staff at headquarters, regions, field offices, or laboratories who have responsibility for managing Federal records. All other terms are defined in NARA records management regulations (36 CFR 1220.14 and 1234.2).

Program Management

An effective EPA records management program requires:
- A clear definition of program objectives, responsibilities, and authorities;
- Sufficient resources to administer the program;
- Continuing training for staff; and,
- Regular internal evaluations to monitor compliance and program effectiveness.

The benefits derived from a good records management program include:
- Ready access to records that provide essential evidence of Agency actions;
- Documentation of the rights of citizens and the actions of federal officials;
- Economy and improved efficiency through access to complete and accurate information;
- Avoidance of unnecessary costs for records storage; and,
- Assurance of continuity of operations through preservation of essential records.

A. Program authorization and organization

Yes	No	Questions
		1. Has the program or office formally designated a records liaison with responsibility for carrying out a records management program?
		2. Does a program directive(s) define the role and responsibilities of the records liaison and the scope of the

Yes	No	Questions
		records management program and provide authority to the records liaison to conduct an effective program-wide program?
		3. Has the program or office formally incorporated its records management program into the information resources management program?
		4. Does the program or office records liaison provide program direction to a network of records liaisons in major divisions throughout the program?
		5. Are records management responsibilities included in the position descriptions for records liaisons?
		6. Does the program or office records liaison routinely communicate with all records liaisons?
		7. Are all employees informed of the identity and role of the records liaisons serving their office?
		8. Does the program or office records liaison participate in planning for new electronic information systems and in major modifications to existing systems to ensure incorporation of recordkeeping requirements and records disposition procedures? Specifically:
		a. Is the records liaison involved in the development of micrographic applications?
		b. Is the records liaison involved in the development of electronic recordkeeping systems, including procurement of computer equipment?
		c. Is the records liaison involved in the development of document imaging systems?

B. Guidance and Training

Yes	No	Questions
		1. Has the program or office records liaison received training in Federal and EPA records management regulations, policies, and procedures?
		2. Do records liaisons, secretaries, file clerks, and others with regular records duties receive training in records maintenance and filing procedures and records disposition?
		3. Is records management guidance received from NRMP, or other oversight agencies such as NARA, tailored, when appropriate, to reflect the program or office specific procedures prior to dissemination to appropriate program or office staff?
		4. Does the records liaison brief senior officials and program administrators on the importance of records management and records handling responsibilities?

C. Internal evaluations

Yes	No	Questions
		1. Does the records liaison periodically evaluate records management practices?
		2. Do these evaluations include electronic records?
		3. Are written evaluation reports prepared?
		4. Are evaluated programs or offices required to respond to the evaluation reports promptly?
		5. Does the records liaison follow up to determine if offices implement necessary corrective action or recommendations for improvements?

Records Creation and Recordkeeping Requirements

Ensuring adequacy of documentation in any information system depends on the clear articulation of recordkeeping requirements. Recordkeeping requirements:

- Specify the creation and maintenance of specific records to document agency operations and activities.
- Facilitate action by agency officials and their successors.
- Permit continuity and consistency in administration.
- Make possible a proper scrutiny by Congress and other duly authorized agencies.
- Protect the rights of the Government and those affected by its actions.
- Document important meetings and the formulation and implementation of basic policy and decisions.

A. Creation of records and adequacy of documentation

Yes	No	Questions
		1. Has the program or office provided guidance for all employees on the definition of Federal records and nonrecord materials, including those created using office automation, and guidance on the ways in which the records must be managed?
		2. Does each program or office have written guidance on what records, including electronic records, are to be created and maintained and the format of the official copy?
		3. Has the program or office issued guidance and instructions for documenting policies and decisions, especially those arrived at orally?
		4. Has the program or office issued guidance on the record status of working papers/files and drafts?
		5. Has the program or office issued guidance on personal papers?
		6. Do program or office procedures require creation of finding aids such as captions and indexes to facilitate access to individual files or record items, when appropriate?

B. Contractor records

Yes	No	Questions
		1. Do contracts identify which contractor-created records are Federal records?
		2. Does the program provide contractors with the regulations and procedures governing Federal records?
		3. Particularly when electronic records are involved, do contracts specify the delivery of background data that may have further value to the agency in addition to the final product?
		4. Do contracts involving development of electronic systems specify the delivery of systems documentation to the agency along with the final product?
		5. Particularly when electronic records are involved, do contracts specify the delivery of final products and background data in a format that is compatible with program records maintenance and retention guidelines?
		6. Are deferred ordering and delivery of data clauses included in contracts when it is impractical to identify in advance all electronic data that should be delivered to the Government?

Records Maintenance

Effective and proper management of records ensures that:

- Complete records are maintained.
- Records can be located when needed.
- Records, nonrecord materials, and personal papers are maintained separately.
- Identification and retention of permanent records are facilitated.

Proper records maintenance also contributes to economy of operations by facilitating records disposition. This section covers general records maintenance policies and practices, regardless of media, and several aspects of records maintenance that apply specifically to paper-based records. The next section specifies additional requirements for special records; i.e., records other than traditional paper text.

A. General

Yes	No	Questions
		1. Has the program or office established standards and procedures for classifying, indexing, filing, and retrieving records and made them available to all employees?
		2. Is access to all records, regardless of media, limited to authorized personnel?
		3. Are cutoffs (file breaks) clearly defined and implemented for each records series?
		4. Are permanent series of records identified and maintained separately from temporary records?
		5. Has the program or office established and implemented regulations or procedures for the storage of confidential business information (CBI), Privacy Act, and other restricted records?

B. Paper-based Records

Yes	No	Questions
		1. Has each office designated official file locations (file stations)?
		2. Is a file plan for each series of records maintained at each file station?
		3. Does each office have procedures for filing, charging out, and refiling its records?
		4. Are file drawers and folders labeled correctly?

Maintenance of Special Records

Special records are those in formats other than traditional paper text files; i.e., electronic, audiovisual, cartographic, and architectural records. The physical properties of the materials used to create microfilm and special records require additional standards for their maintenance.

A. Electronic Records

1. General

The following questions apply to all electronic information systems that contain federal records, regardless of media or application.

Yes	No	Questions
		a. Are records in program or office electronic information systems readily identifiable?
		b. Do electronic recordkeeping systems that maintain the official copy of text documents on electronic media provide indexing or text search capabilities?
		c. Do electronic recordkeeping systems require user identification codes or passwords to control access and ensure integrity of the documents?
		d. Does the program or office regularly back up electronic records to safeguard against loss of information due to equipment malfunction or human error?
		e. Does the program or office avoid the use of diskettes for the exclusive long-term storage of permanent or unscheduled records?
		f. Do electronic recordkeeping systems provide a standard interchange format, when necessary, to permit the exchange of electronic documents between agency or program components using different software/operating systems and the conversion or migration of documents from one system to another?
		g. Does the program or office maintain complete and up-to-date technical documentation for each electronic information system that contains Federal records?
		h. Does the program or office safeguard and maintain all software and hardware required to read electronic records throughout their life?
		i. Are procedural controls in place for all electronic recordkeeping systems (magnetic and imaging) to protect the integrity of the Federal records and their legal admissibility under the rules of evidence?

2. Magnetic media

In addition to applying the questions under subsection A-1, Electronic Records - General, of this section, the following questions should be discussed to ensure the proper maintenance of records on magnetic media.

Yes	No	Questions
		a. Has the program or office implemented a standard procedure for external labeling of the contents of diskettes, disks, magnetic tape reels or cartridges?
		b. Are tapes used for permanent and unscheduled records tested within 6 months prior to use to verify that they are free of permanent errors?
		c. Are tapes used for permanent and unscheduled records rewound under controlled tension every 3 years?
		d. Is an annual statistical sample of tapes used for permanent and unscheduled records read to identify any loss of data and to discover and correct the causes of data loss?
		e. Are tapes used for permanent and unscheduled records copied before they are 10 years old onto tested and verified new tapes?
		f. Are magnetic media containing permanent or unscheduled records stored under recommended temperature and humidity conditions (between 62 and 68 degrees Fahrenheit and constant relative humidity between 35 and 45 percent), and is the media protected from potential exposure to magnetic fields?

3. Office automation applications

In addition to applying the questions of subsection A-1, Electronic Records - General, of this section, special consideration should be given to electronic records created using personal computers (electronic mail, word processing documents, databases, and spreadsheets).

Yes	No	Questions
		a. Have all employees using personal computers received training and guidance in determining record status of documents that they create with office automation applications?

Yes	No	Questions
		b. Has the program or office implemented procedures for maintaining Federal records created using personal computers in an official file (hard copy or electronic recordkeeping system)?
		c. Are all staff who use computers trained in procedures to avoid the unintentional loss of records, including techniques for backing up files and for handling diskettes?

4. Optical Imaging Systems

In addition to applying the questions of subsection A-1, Electronic Records - General, of this section, the following questions should be used in evaluating compliance with recordkeeping requirements for optical imaging systems:

Yes	No	Questions
		a. Do CD-ROM disks used to store permanent records meet NARA transfer requirements?
		b. Do optical imaging systems conform to NARA policy requiring the disposition of original records when converting to an optical digital data disk storage system?

B. Audiovisual Records

Yes	No	Questions
		1. Are the original and use copies of audiovisual records maintained separate from each other?
		2. Are finding aids such as indexes, captions, lists of captions, data sheets, shot lists, continuities, review sheets, and catalogs (published or unpublished) maintained for all audiovisual records?
		3. Are cross-references to closely related textual records maintained with audiovisual records?
		4. Has the program or office instituted procedures to ensure that information on permanent or unscheduled magnetic sound or video media is not erased or overwritten?
		5. Does the program or office retain original photographic images created electronically (digital photography)?

Yes	No	Questions
		6. Does the program or office maintain originals of permanent or unscheduled photographs scanned into computer programs?
		7. Does the program or office store permanent audiovisual records, particularly color films and photographs, in environmentally controlled space (72 degrees Fahrenheit or less and the relative humidity between 30 and 40 percent)?

C. Cartographic and Architectural Records

Yes	No	Questions
		1. Are maps and drawings stored flat in shallow-drawer map cases rather than folded or rolled?
		2. Are permanent maps and drawings stored in acid-free folders?
		3. Are large, heavy atlases and other bound volumes of maps or drawings stored flat, preferably on roller shelves to facilitate moving them without damage?
		4. Do adequate finding aids such as indexes exist for cartographic and architectural records?
		5. Are cross-references to closely related textual records maintained with cartographic and architectural records?

D. Micrographic Records

Yes	No	Questions
		1. Are records on microform arranged and indexed to permit ready retrieval of individual documents?
		2. Do microforms contain a title header or initial target page that identifies the records?
		3. Are boxes containing microforms individually labeled with the records series title and date span of the records, and are they sequentially numbered?
		4. Are permanent and temporary records filmed separately?
		5. Are silver and nonsilver microforms filed separately?

Yes	No	Questions
		6. Are silver master microforms of permanent and unscheduled records inspected every 2 years while these records are in storage?

Records Disposition

Records disposition is a critical element of records management. EPA's records disposition program enables programs and offices to dispose of records that are no longer needed in the office for current agency business. Only those active records needed for current business should be maintained in offices. EPA programs and offices should use records schedules to determine when to destroy records or transfer them to more cost effective storage in Federal records centers or storage areas. The records disposition program contributes to economical and efficient agency operations. Clearly written, up-to-date, and properly implemented comprehensive records schedules form the basis for a sound records disposition program. Federal agencies must schedule all Federal records they create or receive. NARA issues General Records Schedules (GRS) for temporary records common to most agencies. The General Records Schedules include records relating to civilian personnel, fiscal accounting, procurement, communications, printing, and other common functions and certain nontextual records. These schedules provide disposition authority, so agencies do not have to schedule those records individually, unless a deviation from the GRS disposition standard is needed. However, the EPA has incorporated the information from many of the GRS into the EPA Records Schedules. The EPA may request authority to apply a disposition standard different from the GRS by submitting an SF 115, Request for Records Disposition Authority, along with a justification for the deviation. Records schedules for Federal records must be approved by NARA before implementation, and once approved, they are mandatory. EPA must also request NARA approval for transferring records to any other Federal agency or donating them to an individual or non-Federal institution. Permanent electronic, audiovisual, cartographic, and architectural records should be

scheduled for transfer to the National Archives as soon as possible because of their fragility and special preservation needs.

A. Records Schedule Development

Yes	No	Questions
		1. Are records schedules based on inventories of program records? Are the inventories updated periodically to reflect new records series or electronic information systems, changes in recordkeeping practices, or changes in programs resulting from legislative or regulatory changes? (EPA requires inventories to be conducted at least every three years.)
		2. Do program records schedules contain a clear and complete description of records series that reflects the content and arrangement of the program's files? Do schedules contain a clear and concise description of electronic recordkeeping systems that reflects the purpose, content, sources of information, and outputs?
		3. Do the disposition instructions include provisions for: Cutoffs or file breaks, Instructions for retiring appropriate hard copy records to Federal records centers, Transfer instructions for all records proposed for permanent retention to the National Archives followed, and Specific retention periods before final disposition of all records?
		4. Are the disposition instructions for electronic records followed that require the transfer to the National Archives of permanent electronic records as soon as they become inactive?
		5. Do program officials review proposed records schedules relating to their office or function?
		6. Are reviews periodically conducted to identify new records series and information systems that should be scheduled and changes in recordkeeping practices that require records schedule revision?

B. Records Schedule Implementation

Yes	No	Questions
		1. Do the records liaisons monitor implementation of the records schedules?
		2. Does the program or office provide copies of EPA records schedules to all staff that handle Federal records?
		3. Are records destroyed only in accordance with EPA records schedules?
		4. Do file custodians take prompt action to cut off files, destroy records whose retention periods have expired, and retire eligible records to a Federal records center (FRC) in accordance with EPA records schedule provisions?
		5. Are permanent records transferred to the National Archives as provided in the EPA records schedules?

For further information, see NARA publications "Disposition of Federal Records" and the "General Records Schedules." The National Records Management Program maintains the EPA Records Schedules. Copies can be obtained from the NRMP and they can be found on the NRMP web page.

Essential Records

An essential records program is intended to assist programs in identifying and protecting those records essential to continuing their operations under other than normal business conditions and to protecting the rights of the Government and those individuals directly affected by its actions.

Yes	No	Questions
		1. Has the program assessed potential risks to their essential records?
		2. Is the program familiar with the Agency essential records policy, authorizing the essential records program and specifying the responsibilities of various program officials?
		3. Has the program designated an essential records point person to coordinate the program's essential records plan?

Yes	No	Questions
		4. Has the program identified its essential records, i.e., its emergency operating records and legal rights records?
		5. Does the program periodically review its essential records plan and update it as necessary?
		6. If special media records (such as electronic or microform records) are designated as essential records, have provisions been made for access to the equipment needed to use the records in case of emergency?

For further information, see 36 CFR, Part 1223 - Management of Essential Records; and the NARA publication, "Vital Records and Record Disaster Mitigation and Recovery," and the NRMP Tool Kit: Developing and Maintaining an Essential Records Program.