

U.S. Department of the Interior Departmental Manual

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Series: Information Resources Management
Part 380: Records Management
Chapter 1: Records Management Program Roles and Responsibilities
Originating Office: Office of the Chief Information Officer

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1.1 Purpose.

This chapter establishes policies, objectives, roles, and responsibilities for the creation, maintenance and use, and disposition of Federal records as well as the safeguarding of Federal records and information within the Department of the Interior (Department).

1.2 Authorities.

- A. 44 U.S.C. Chapter 21, “National Archives and Records Administration” (NARA);
- B. 44 U.S.C. Chapter 29, “Records Management by the Archivist of the United States and by the Administrator of General Services;”
- C. 44 U.S.C. Chapter 31, “Records Management by Federal Agencies;”
- D. 44 U.S.C. Chapter 33, “Disposal of Records;”
- E. 18 U.S.C. Chapter 101, “Records and Reports;”
- F. Office of Management and Budget (OMB) Circular A-130, “Management of Federal Information Resources;”
- G. OMB Memorandum M-19-21, “Transition to Electronic Records;” and
- H. 36 CFR Chapter XII, Subpart B, “Records Management.”

1.3 Definitions.

Refer to Appendix 1 for terms and definitions used within this Departmental Management (DM) chapter.

1.4 Policy.

The records management policy of the Department:

- A. Ensures accurate and complete documentation of the Department’s organization, functions, policies, decisions, procedures, and essential transactions;
- B. Provides for proper identification, organization, and management of all record material regardless of format;
- C. Segregates records and non-records;

- D. Adheres to record retention and disposition instructions in NARA-approved records schedules;
- E. Safeguards Departmental records to prevent unauthorized access, removal, loss, and destruction; and
- F. Protects the legal and financial rights of the Federal Government and persons directly affected by the Department's activities.

1.5 Objectives.

The Department's Records Management Program objectives include:

- A. Compliance with NARA regulations and guidance, Executive orders, and OMB A-130 on the management of all Federal records in all formats;
- B. Development and implementation of Departmental policies, guidance, and standard operating procedures that support this DM chapter, applicable laws and regulations, and the ongoing needs of the Bureaus and Offices;
- C. Relevance of Bureau and Office policies, guidance, and standard operating procedures to their mission needs; and alignment with the Departmental Records Management Program policies;
- D. Management of information and records throughout all phases of the records management lifecycle;
- E. Incorporation of records management and preservation requirements into the information system lifecycle;
- F. Linkage to the following laws directly related to the Records Management Program:
 - 1. 44 U.S.C. Chapter 35, "Coordination of Federal Information Policy;"
 - 2. 5 U.S.C. § 552, "Public information; agency rules, opinions, orders, records, and proceedings;"
 - 3. 5 U.S.C. § 552a, "Records maintained on individual;" and
- G. Training and guidance commensurate with roles and responsibilities for all Departmental staff on the Departmental Records Management Program.

1.6 Responsibilities.

A. Secretary of the Interior:

The Secretary of the Interior establishes and maintains an active, continuing program for the economical and efficient management of Department records.

B. Chief Information Officer (CIO):

The CIO serves as, or designates, the Departmental senior agency official for records management (SAORM) to NARA.

C. Senior Agency Official for Records Management

- 1. Provides the Department with a clear vision and strategic direction to modernize agency records management programs;
- 2. Ensures adequate records management resources are embedded into the Department's Strategic Information Resources Management (IRM) Plan;

3. Provides budgetary and personnel resource guidance to heads of Bureaus and Offices to implement an efficient and effective Departmental Records Management Program;
4. Establishes, where appropriate, records management program offices to ensure adequate management of routine mission support functions;
5. Ensures the designation of records management responsibilities in each program (mission area) and administrative area to ensure the incorporation of recordkeeping requirements and records maintenance, storage, and disposition practices into programs, processes, systems, and procedures;
6. Ensures Departmental staff are informed of and receive training on their records management responsibilities;
7. Issues Departmental directives, policies, and initiatives supporting OMB and NARA directives and guidance for transitioning towards a fully electronic government;
8. Ensures compliance with NARA requirements for electronic records, including the electronic management of all permanent electronic records to the fullest extent possible for eventual transfer to and accessioning by NARA;
9. Directs Departmental efforts across program areas to ensure email records are managed electronically and retained in an appropriate electronic information systems (EIS) that supports records management and litigation requirements, including the capability to identify, retrieve, and retain the records consistent with NARA-approved disposition authorities and regulatory exceptions;
10. Ensures policies, procedures, and systems are in place and configured to protect records against unauthorized removal or loss;
11. Directs the use of Department-wide records management internal controls, self-assessments, and remediation plans;
12. Reviews NARA's annual records management self-assessment analysis and risk ratings to determine vulnerabilities and identify plans for improvement;
13. Delegates responsibilities as appropriate, to the Departmental Records Officer for implementation.

D. Departmental Records Officer (DRO):

1. Leads and manages the Department's Records Management Program;
2. Establishes effective and efficient recordkeeping requirements for the Department;
3. Establishes, maintains, and communicates policies, guidance, and best practices for records management;
4. Oversees applicable records management policies and procedures;
5. Coordinates, develops, and approves proposed records management changes to DM parts consistent with applicable laws and authorities;
6. Coordinates records management activities with other Federal agencies and NARA;
7. Supports the creation, review, and approval of the Departmental Records Schedule (DRS) in coordination with responsible records officers;
8. Periodically reviews and approves Bureau records management plans;

9. Provides support to responsible records officers and resolves inter-bureau records management issues;
10. Supports the Department's policies regarding preservation holds and coordinates with the Office of the Solicitor and other offices concerning the appropriate suspension of disposition;
11. Coordinates and supports Departmental records management training;
12. Supports Bureau records management training programs;
13. Ensures records management requirements are addressed in the Departmental processes for capital planning, enterprise architecture, business process design, and the systems development lifecycle;
14. Ensures standard records management language is defined and shared with contracting offices per NARA requirements;
15. Provides support for electronic records management through the Department including the following:
 - a. Participates in the development of new or revised programs, initiatives, processes, systems, and procedures to ensure adequate and proper documentation requirements are established and implemented;
 - b. Reviews, oversees, and ensures compliance of any Departmental EIS containing records;
 - c. Reviews and approves all Departmental records and document management systems; and
 - d. Provides guidance and support and ensures compliance in the Department-wide effort to develop and maintain an electronic records management program.

E. Heads of Bureaus:

Under the direction and purview of the DRO, Bureaus will identify, document, disseminate, and periodically review recordkeeping requirements for all required activities at all levels within their organization. Bureaus are required to make and preserve records containing adequate and proper documentation of their organization, functions, policies, decisions, procedures, and essential transactions. To meet these Bureau responsibilities, heads of Bureaus:

1. Assign the Bureau responsible records officer(s) and inform the DRO;
2. Maintain an active records management program for their organization to include an essential records program;
3. Ensure Bureau policies and procedures are established in accordance with NARA regulations and Departmental policy as disseminated; and
4. Coordinate, review, and approve Bureau records management budgets.

F. Responsible Records Officer:

1. Creates and maintains a Bureau records management plan to comply with Departmental policies and objectives;
2. Implements and uses the Departmental-approved electronic records management systems;

3. Creates and maintains supplemental records management directives in compliance with Federal regulations and Departmental policy and disseminates this information within their organization;
4. Participates in the Department's development of new or revised programs, initiatives, processes, systems, and procedures to ensure adequate and proper documentation requirements are established and implemented;
5. Ensures Bureau staff know:
 - a. Records management responsibilities and established recordkeeping requirements;
 - b. Procedures required to meet the legal requirements concerning records held in their custody and the consequences or criminal penalties;
 - c. The adverse actions that may result from unlawful removal, modification, loss, theft, or unauthorized destruction of records;
6. Coordinates the development and implementation of records schedules for all records created and received by the Bureau, aligning these schedules with the DRS, and submitting all records schedules for review and approval by the DRO for incorporation into the appropriate NARA-approved Records Schedule;
7. Provides training to Bureau staff on the appropriate implementation of the NARA-approved Records Schedules;
8. Ensures compliance with preservation and legal holds;
9. Provides Bureau oversight in the records management lifecycle;
10. Integrates records management procedures and activities into other Bureau IRM and data resources management initiatives, projects, and activities;
11. Maintains an inventory of Bureau systems and associated records schedules;
12. Ensures periodic evaluations of the records management program to monitor compliance with applicable laws and NARA, Department, and Bureau regulations, policies, standards, and procedures;
13. Ensures programs identify, protect, and manage essential records as part of the continuity of operations plan (COOP) to meet mission-essential functions and support activities and to address the mitigation of damaged records; and
14. Ensures essential records are identified for use in COOP.

G. Records and Information Management Staff

Provide services within their specific program or office as follows:

1. Assist the responsible records officer with the implementation and maintenance of the approved Bureau records management plan;
2. Serve as the records management liaison between the responsible records officer and Bureau/program managers and staff;
3. Provide guidance and technical assistance on the Records Management Lifecycle;
4. Coordinate and disseminate new records management directives, policies, and procedures;
5. Assist senior officials and program managers with the information collection of program records required for preliminary development or revisions to file plans and records schedules;

6. Plan and provide training to staff at various levels on their records management roles and responsibilities;
7. Identify areas of weakness within the program or office and work collaboratively with the responsible records officer to provide records management briefings, workshops, and recommendations to resolve identified areas of weakness;
8. Serve as the first point of contact within the program or office staff regarding records management activities;
9. Identify recordkeeping requirements for programmatic and administrative records with program management approval;
10. Assist in the approval and disposition of program records;
11. Support and maintain the file plan and accountability for active and inactive records;
12. Assist and ensure eligible program records are promptly prepared for retirement to an approved records storage repository; and
13. Initiate remediation tasks to resolve records management deficiencies and weaknesses.

H. Information System Owners and Managers

1. Incorporate records management functionality into information systems;
2. Ensure system updates and revisions to information systems incorporate records management requirements; and
3. Work with the responsible records officer to ensure all information systems have a NARA-approved records schedule.

I. Contracting Officer and Contracting Officer Representative:

Consult with the appropriate records officers in selection, addition, or deletion of any contractual clauses that impact information handling and records management including, but not limited to:

1. Information sensitivity and controlled access;
2. Information handling and records disposition;
3. Ownership of information, data, and records created or generated as part of the contract; and
4. Protection and preservation of records created or generated as part of the contract.

J. Managers and Supervisors:

1. Ensure employees comply with records management responsibilities;
2. Support records management activities within respective Bureaus;
3. Ensure Departmental staff have completed annual mandatory records management training and understand their records management responsibilities;
4. Designate records and information management staff as appropriate;
5. Work with records and information management staff and responsible records officer to develop procedures to manage records throughout the records management lifecycle and disposition in accordance with the DRS and NARA-approved records schedules;

6. Work with records and information management staff and responsible records officer to approve and transfer records to the National Archives in accordance with DRS and NARA-approved Records Schedules;
7. Designate file storage locations and records and information management staff in their respective Bureaus;
8. Coordinate with human resource offices to ensure departing employees have identified the location of their records and to acknowledge, within the existing process, receipt of the departed employees' records;
9. Ensure adequate resources are available for records management activities and functions;
10. Coordinate EIS activity with the responsible records officer to ensure compliance with regulations, OMB Circular A-130, policy, and procedures; and ensure capture of records within the EIS or Departmental records and document management system and;
11. Coordinate with, and receive approval from, the responsible records officer to integrate records management functions into the design and development of EIS.

K. Departmental Staff:

All Departmental staff are responsible for making and preserving records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the Department and for furnishing information necessary to protect the legal and financial rights of the Department and of persons directly affected by the Department's activities. To adhere to these responsibilities, Departmental staff:

1. Create, receive, organize, and maintain records that reflect decisions and actions that document activities for which they are responsible;
2. Identify and segregate records, non-records, and personal papers;
3. Manage and safeguard records in accordance with the guidance provided by the responsible records officer and the records and information management staff and by the approved records schedules, including while teleworking or working remotely;
4. Coordinate with their responsible records officer and records and information management staff in the development, modification, implementation and use of the appropriate approved DRS or NARA-approved records schedules;
5. Coordinate with the responsible records officer or the records and information management staff to carry out the disposition of records within their purview;
6. Identify any actual or potential loss of records and information to responsible records officer, records and information management staff, and system owner for reporting to NARA;
7. Identify records on file maintenance and disposition plans and coordinate with responsible records officer and records and information management staff;
8. Transition all records within their custody to their office manager or supervisor when leaving their position. Transitioning activities include identifying,

coordinating, and certifying the records transfer with their manager or supervisor and responsible records officer;

9. Collaborate with appropriate staff to preserve records in NARA-accepted formats when participating in the commissioning or decommissioning of systems;
10. Identify essential records for the use in COOP;
11. Comply with legal obligations, including but not limited to preservation and litigation holds including assisting in locating responsive records; and
12. Complete any mandatory records management training for understanding records management responsibilities.

Appendix 1 – Definitions for 380 DM Chapters

The following definitions apply to Part 380 DM and policies issued pursuant to Part 380 DM. These definitions are based upon Departmental terms and NARA regulations and guidance.

A. Adequate and Proper Documentation

A record of the conduct of Government business that is complete and accurate to the extent required to document the organization, functions, policies, decisions, procedures, and essential transactions of the agency and that is designed to furnish the information necessary to protect the legal and financial rights of the Government and of person directly affected by the agency's activities.

B. Bureau Records Management Plan

Bureau completion of a DRO-approved template that builds, develops, and supports the Bureau records management program.

C. Departmental Staff

Includes, but is not limited to, employees, contractors, volunteers, interns, trainees, students, and others that work on behalf of the Department of the Interior (Department).

D. Departmental Records Schedule

A flexible records schedule that aligns similar lines of business records with streamlined and simplified management across an organization's enterprise. For the purposes of the Department, the enterprise is at the Department level.

E. Electronic Information Systems (EIS)

Information systems that contain and provide access to computerized Federal records and other information. Electronic information systems are not limited to major applications and include databases and spreadsheets that have been created to capture data and information used for program business functions and decision-making activities.

F. Federal Records

Defined in 44 U.S.C. 3301(a)(1) as:

(A) ... all recorded information, regardless of form or characteristics, made or received by a Federal agency 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 United States Government or because of the informational value of data in them; and

(B) ...does not include—

- i. library and museum material made or acquired and preserved solely for reference or exhibition purposes; or
- ii. duplicate copies of records preserved only for convenience.

G. File Maintenance and Disposition Plan (File Plans)

A plan designating: 1) physical or logical locations where program files are to be maintained; 2) specific types of files to be maintained at each location; and 3) the organizational elements that have custodial responsibility. For files held in a Bureau, a file plan contains an identifying record, which consists of series number, title, description, and disposition instructions.

H. Media

Physical form of recorded information. Includes paper, film, disk, tape, and other materials on which information can be recorded.

I. Recordkeeping Requirements

A term used to refer to requirements identified within statutes, regulations, agency directives, or other issuances specifying which records are to be created or received and maintained by Department staff.

J. Records Management Lifecycle

Three-phase lifecycle to managing record materials from creation, to maintenance and use, and through disposition. This includes plans to automate manual recordkeeping systems. The records lifecycle should ensure that all new records or information management systems are properly scheduled and that all records schedules are aligned with DRS.

K. Records Schedule

A published manual or directive containing the records descriptions and disposition instructions approved by NARA on Standard Form 115. This definition includes NARA's General Records Schedule.

L. Records and Information Management (RIM) Staff

Designated by managers, supervisors, or program management to assist Bureaus and Offices in understanding Departmental and Bureau records management policies and procedures. The RIM staff assists with organizing, maintaining, and dispositioning program or office records, and serves as a liaison between the responsible records officer and program managers and staff. Individual Bureaus may refer to these positions as records liaisons, records managers, regional records officers, or by other titles. The RIM staff should have records management performance standards built into their annual performance plans and should also have formal records management training.

M. Responsible Records Officer

A Bureau or Office records officer that has been delegated authority for a NARA record group or that has authority over a significant office with a specific NARA records group. Responsible records officers may have responsibilities for multiple Bureaus or a large office within a Bureau.

N. Suspension of Dispositions

Occurs as a result of special circumstances that require the suspension of normally scheduled records dispositions until circumstances allow the resumption of normal or modified

dispositions. The special circumstances requiring suspension of dispositions include anticipated or pending litigation, the issuance of a litigation hold notice, a Freedom of Information Act request, or an investigation.