

Department of the Interior Departmental Manual

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Series: Information Resources Management

Part 380: Records Management

Chapter 1: Records Management Program and Responsibilities

Originating Office: Office of Information Resources Management, Office of the Secretary

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1. **Purpose and Scope.** This Departmental Manual Chapter explains the Departmental Records Management Program in general terms and assigns responsibilities for managing Departmental records. Guidance regarding specific Departmental recordkeeping requirements (e.g., adequacy of documentation, files management, records disposition, vital records, electronic records, audio-visual records, correspondence, forms, and reports management) is addressed in separate Manual Chapters.

2. **Records Management Program Overview.** The Records Management Program focuses primarily on information needed and used by the Department to carry out its mission. Information is the most valuable component of a record. The secondary focus of the Records Management Program is the media on which the information is recorded. Record media includes a variety of paper, audiovisual, cartographic, and electronic media used to document information, to transmit it from one place to another, and to store or preserve it for future use.

Records management processes such as correspondence, forms, reports, directives, and a variety of filing and indexing structures and procedures provide methods of documenting and organizing information for efficient maintenance, retrieval, and disposition. Records inventories and schedules provide tools for effectively managing a wide variety of information maintained on a wide variety of media.

The unique records created and maintained by the Department of the Interior contain valuable information concerning the Nation's public lands and resources and there is a great internal and external demand for access to this information. Departmental records serve as the Department's memory and are of critical importance to ensuring that the organization continues to function properly.

3. **Policy.** It is the Department's policy to properly identify Departmental recordkeeping requirements and to effectively and efficiently manage needed records throughout their life cycle.

4. **Authorities and References.** The Department's Records Management Program is based on the requirements of 44 U.S.C. Chapters 21, 29, 31, and 33 (Records Management); 5 U.S.C. 552 and 552a (Information Access); 44 U.S.C. Chapter 35 (Paperwork Reduction Act); Office of Management and Budget (OMB) Circular A-130 (Management of Federal Information Resources); implementing regulations issued by the National Archives and Records

Administration (NARA) in 36 CFR, Subpart B (Records Management); by the General Services Administration (GSA) in 41 CFR 201-9; and various NARA and Federal Information Resources Management Regulations (FIRMR) Bulletins. References used to develop guidance for specific Departmental recordkeeping requirements are identified within the appropriate DM chapters.

5. Program Objectives. The Department's Records Management Program objectives are as follows:

- A. Accurate and complete documentation of the policies and transactions of the Department.
- B. Control of the quantity and quality of records produced by the Department.
- C. Establishment and maintenance of control mechanisms to prevent the creation of unnecessary records and foster effective and economical Departmental recordkeeping operations.
- D. Simplification of Departmental activities, systems, and processes of records creation, maintenance and use.
- E. Judicious preservation and disposal of Departmental records.
- F. Management of Departmental records from their initial creation to their final disposition.
- G. Coordination with other IRM functional requirements as needed.
- H. Proper identification and separation of record and non-record materials.
- I. Establishment of adequate safeguards to prevent unauthorized access, removal, and loss of Departmental records.

6. Records Management Program Responsibilities. The Secretary of the Interior is responsible for establishing and maintaining an active, continuing program for the economical and efficient management of Departmental records (44 U.S.C. 3102). The Office of Information Resources Management (PIR) is responsible for developing the Department's Records Management Program including:

- A. Assigning a Departmental Records Management Officer to develop an effective program that implements the records management objectives identified in paragraph 1.5 and notifying NARA of that assignment.
- B. Integrating records management procedures and activities into other Departmental IRM procedures and activities, as appropriate.
- C. Issuing directives that establish records management program objectives, responsibilities, and authorities for Departmental recordkeeping requirements and ensuring copies are disseminated to NARA and throughout the Department.
- D. Establishing procedures for the participation of records management in the development of new or revised Departmental programs, processes, systems, and procedures in order to ensure

that adequate recordkeeping requirements are established and implemented.

E. Ensuring compliance with applicable Federal policies, procedures, and standards relating to recordkeeping requirements as may be issued by the Office of Management and Budget, GSA, NARA, the National Institute of Standards and Technology, or other agencies, as appropriate.

F. Reviewing disposition authorities for temporary Departmental records that affect the legal rights and interest of the Department and parties affected by Departmental activities.

G. Representing the Department in Federal records management activities and resolving interbureau records management conflicts.

7. Bureau and Office of the Secretary (O/S) Records Management Program

Responsibilities. The Director of Administrative Services (PMO), for the O/S, and Heads of Bureaus are responsible for establishing and maintaining active and continuing records management programs for their organizations which include:

A. Assigning a Records Management Officer to develop and implement a comprehensive records management program that is consistent with all established Departmental records management guidelines and notifying PIR of the assignment.

B. Creating and maintaining supplemental records management directives and appropriately disseminating this information within the organization.

C. Participating in the organization's development of new or revised programs, processes, systems, and procedures to ensure adequate recordkeeping requirements are established and implemented.

D. Ensuring employees are aware of records management responsibilities and established recordkeeping requirements.

E. Developing and implementing records schedules for all records created and received by the organization and obtaining NARA approval of the schedules in accordance with NARA and Departmental guidelines.

F. Periodically reviewing the organization's recordkeeping requirements in order to validate their currency and to ensure that recordkeeping requirements are being implemented. Copies of internal records management evaluations should be forwarded to PIR.

G. Cooperating and coordinating with other bureaus, PMO, and PIR in various Departmental Records Management program activities.

8. Departmental Employee Responsibilities. The Secretary of the Interior is responsible for making and preserving records containing adequate documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the Department and to furnish the information necessary to protect the legal and financial rights of the Department and of persons directly affected by the Department's activities (44 U.S.C. 3101).

A. Management officials, in coordination with designated Records Officers, are responsible for the following:

(1) Distinguishing records from non-record materials in accordance with sections 11 and 12, and

(2) Identifying proposed disposition time frames for records created and/or maintained by or for their program(s).

B. All employees are responsible for:

(1) Creating and maintaining records needed to carry out their assigned duties,

(2) Filing records according to the organization's established filing procedures and plans,

(3) Avoiding duplicate recordkeeping unless absolutely necessary, and

(4) Disposing of records in accordance with approved records retention and disposition schedules.

9. **Definitions.** Federal records are defined in 44 U.S.C. 3301 and further clarified in 36 CFR 1222.12 as follows:

A. Federal Records are defined as 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 data in them.

(1) **Documentary materials** refer to all media containing recorded information, regardless of the nature of the media or the methods or circumstances of recording.

(2) **Regardless of physical form or characteristics** means that the information may be recorded on any medium and the method of recording may be manual, mechanical, photographic, electronic, or any combination of these and other technologies.

(3) **Made** means the act of creating and recording information by agency personnel in the course of their official duties, regardless of the methods or media involved. The act of recording is generally indicated by circulating the information to others or by placing it in files (including electronic files) that are accessible to others.

(4) **Received** means the acceptance or collection of documentary materials by agency personnel in the course of their official duties regardless of their origin and regardless of how transmitted. Legal advice should be sought regarding the record status of loaned or seized documentary materials.

(5) **Preserved** means the filing, storing, or other methods of systematically maintaining documentary materials by the organization. The term also refers to activities associated with ensuring recorded information can be read or accessed for the length of time required by approved disposition authorities.

(6) **Appropriate for preservation** means those documentary materials which in the judgment of the organization should be filed, stored, or otherwise systematically maintained because of the evidence of the organization's activities or the information they contain. The term also refers to activities associated with the care and maintenance of permanent records.

B. Non-Record Materials are defined as library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra (exact) copies of records preserved **only** for convenience or reference, and stocks of publications and of processed documents.

C. Refer to NARA's "A Federal Records Management Glossary," 1989 for additional definitions.

10. **Record Media.** Departmental records may exist on a variety of paper, film, audio-visual, or electronic media.

11. **Record Materials.** Departmental records are used to conduct Departmental business and may include, but are not limited to, the following types of documentary materials:

A. Formal and informal correspondence (e.g., incoming and outgoing letters, memoranda, notes, messages, reports, minutes from meetings, forms, studies, evaluations, position papers, briefing materials, organizational charts, directive manuals and handbooks, case or project files, decision documents, and other similar text or graphic materials that document the organization of the Department and its activities.

B. Cartographic materials such as maps, plats, aerial photographs, engineering drawings, and architectural drawings relating to the Department and/or its activities.

C. Electronic data, data files, and computer system documentation for Automated Information Systems (AIS) created or maintained by the Department to generate various types of text or digital information used to document the Department and/or its activities. The input and output materials used in conjunction with AIS may also be considered Departmental records.

D. Audio-visual materials such as still and motion pictures, sound and video recordings, slides, and presentations that document the organization, activities, decisions, and historical events of the Department.

E. Serialized sets of publications, brochures, pamphlets, or posters, and books created by the Department that document the organization and activities of the Department.

F. Work-related materials, such as preliminary drafts, rough notes, diaries, journals, calendars, schedules, and other similar materials are Federal records if:

(1) They are circulated or made available to employees, other than the originator, for official purposes such as approval, comment, action, recommendation, follow-up, or to

communicate with staff about Departmental business; and

(2) They contain unique information such as substantive annotations or comments that add to a proper understanding of the Department's formulation and execution of basic policies, decisions, actions, or responsibilities.

G. Manual or automated indexes or other types of finding aids that relate to and facilitate retrieval of information contained in record categories listed in A-F.

H. All record materials described in A-G created and received or maintained for the Department by contractors.

12. Non-Record Materials. Departmental non-record materials should clearly identified and maintained separately from official record materials. Non-record materials may include the following:

A. Stocks of publications and of processed documents such as blank forms.

B. Exact duplicate copies of official records identified in 1.11 A-G, regardless of media, that are maintained **solely** for convenience of reference (e.g., correspondence reading files).

C. Museum property acquired by the Department **solely** for exhibition purposes.

D. Books and other library materials purchased or otherwise acquired by the Department for reference use.

E. Personal documentary materials such as diaries, journals, personal correspondence, messages, notes, materials documenting outside business, professional, political activities, or other personal materials, regardless of media, that do not meet the criteria contained in paragraph 11F(1) and (2). Some personal materials, depending upon their use, may be considered Departmental records. Refer to NARA's "Management Guide on Personal Papers of Executive Branch Officials" for additional guidance concerning personal materials.

13. Determining Record or Non-Record Status of Documentary Materials. It is important to distinguish records from non-records in order to identify what documentary materials are subject to the requirements of the Federal Records Act and other records-related legislation.

A. **Multiple Copies.** When it is necessary to create multiple duplicate copies of identified record materials, one copy should be designated as the organization's official record copy. All other exact duplicate copies are non-record materials. Program managers should consult with their designated records management officer when making official record designations.

B. **Electronic Records.** Care needs to be taken when determining the record or non-record status of documentary materials in electronic form.

(1) Electronic versions of documentary materials (e.g., those identified in 1.11 A-H) may be designated as Departmental records **if** the AIS's on which they reside enable the records to be maintained and disposed of according to established recordkeeping requirements. For example, the system must have the capability to:

- (a) Protect private or other sensitive information from unauthorized disclosure;
- (b) Protect designated official records from unauthorized alteration, removal, or destruction;
- (c) Permit effective filing and efficient retrieval of needed records from the system; and
- (d) Enable records to be properly disposed according to approved records retention schedules.

(2) If the standards in 1.13B(1) cannot be met, the electronic information should be copied and transferred to appropriate official filing systems (e.g., paper correspondence, project or case files). The electronic versions would become non-records. When transferring electronic record materials to official files, all pertinent information created by the AIS (e.g., dates, authentication, logon and logoff times and mailing lists), if needed to fully document official business, must also be copied and integrated into the official files.

14. The Records Management Life Cycle. The Department's Records Management Program follows a three-phase life cycle approach to managing record materials from creation, maintenance, use, and through final disposition.

A. **Creation.** The first phase of the records management life cycle begins when a need for information is identified. The need may result from new legislative, regulatory or administrative requirements. The creation phase may also begin when the organization plans to change existing recordkeeping procedures. This would include plans to automate manual recordkeeping systems. Required records management activities during the creation phase include the following:

- (1) Distinguishing record from non-record materials;
- (2) Ensuring only information needed to fulfill Interior's missions is created and/or received by the Department;
- (3) Identifying new records or recordkeeping systems;
- (4) Determining the level of documentation needed to successfully carry out the Department's responsibilities and to protect legal rights and interests;
- (5) Determining appropriate methods of recording needed information for the most efficient and effective use (e.g., as images or as data, as documents or as data base files);
- (6) Identifying records that contain private, proprietary, confidential, or otherwise sensitive information, or information that affects legal rights and interests;
- (7) Selecting the appropriate record media to ensure proper preservation and efficient retrieval of needed information, and;

(8) Preparing all necessary paperwork to properly schedule new records or recordkeeping systems and any significant changes to existing recordkeeping systems.

B. Maintenance and Use. The second phase of the life cycle involves the organization, storage, access, and retrieval of Departmental records. This includes the following records management activities:

- (1) Ensuring non-records are separated from record materials;
- (2) Developing the most efficient and effective means of organizing and retrieving records; and
- (3) Ensuring records containing private and other sensitive information are adequately protected from unauthorized access;

C. Disposition. The last phase of the life cycle includes actions taken when records are no longer needed to conduct Departmental business. Records must be disposed according to NARA-approved records retention schedules. Appropriate record disposition actions include the following:

- (1) Temporarily storing records in NARA-approved agency storage facilities or in established Federal Records Centers;
- (2) Transferring records from one Federal agency to another;
- (3) Transferring custody of permanent records to the NARA; and
- (4) Destroying temporary information.

15. Legal Penalties. Any Federal employee who willfully and unlawfully conceals, removes, mutilates, obliterates, or destroys Federal records shall be fined not more than \$2,000 or imprisoned not more than 3 years, or both; and shall be removed from Federal Service (18 U.S.C. Chapter 101, Section 2071).

16. Records Management Officers Workgroup. The Work Group members include the designated Departmental, Bureau and O/S Records Management Officers identified in paragraphs 1.6A and 1.7A. The Work Group may carry out the following activities:

A. Coordinate the development and execution of the Department's Records Management Program and resolve technical and operational problems that may arise in that process.

B. Keep abreast of new information technologies and activities that may affect the management of Departmental records.

C. Make recommendations to the Director, PIR, to improve the Department's Records Management Program and Departmentwide recordkeeping systems.

D. Develop short and long term Departmental Records Management Program goals and objectives and participate in Departmentwide records management initiatives.

17. **Reporting Requirement.** When requested, all bureaus and the O/S Records Officers shall submit input into internal IRM strategic plans according to guidelines provided by PIR.

18. **Metric Conversions.** The Metric Conversion Act of 1975, as amended by Public Law 100-418, Section 5164, declares the metric system to be the preferred measurement system for U.S. trade and commerce. All appropriate DM Records Management chapters shall reflect either exclusive metric units or dual dimensions (metric/inch-pound) where appropriate and feasible. Refer to DM Part 758 for further guidance.

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