
EPA Classification No.: CIO 2155.1	CIO Approval Date: 6/8/09
CIO Transmittal No.: 09-004	Review Date: 6/12

*Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19, dated 07/07/2005*

Records Management

1. PURPOSE

The Records Management Policy establishes principles, responsibilities, and requirements for managing EPA's records to ensure that the Agency is in compliance with federal laws and regulations, EPA policies, and best practices for managing records. This Agency-wide policy provides the framework for specific guidance and detailed operating procedures governing records management organization and implementation.

2. SCOPE AND APPLICABILITY

This Policy addresses all records made or received by EPA under federal law or in connection with the transaction of public business, and preserved or appropriate for preservation as evidence of EPA functions, organization, and activities or because of the value of the information they contain.

This Policy applies to all EPA Headquarters Programs, Regions, Laboratories and other Offices.

3. AUDIENCE

The audience for this Policy includes all EPA organizations, officials, employees, contractors and grantees.

4. BACKGROUND

- a. The Federal Records Act of 1950, as amended, requires all federal agencies to make and preserve records containing adequate and proper documentation of their organization, function, policies, decisions, procedures, and essential transactions. These records are public property and must be

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managed according to applicable laws and regulations.

- b. The Federal Records Act also requires agencies to establish a records management program, defined as a planned, coordinated set of policies, procedures, and activities needed to manage its recorded information. Essential elements include issuing up-to-date records management directives, properly training those responsible for implementation, and carefully evaluating the results to ensure adequacy, effectiveness, and efficiency.
- c. Records serve a number of purposes including: administrative and program planning needs, evidence of EPA activities, protection of legal and financial rights, oversight by Congress and other authorized agencies, documentation of the Agency's history, and the continuation of key functions and activities in the event of an emergency or disaster. Records serve as the Agency's memory; they are of critical importance in ensuring that the organization continues to function effectively and efficiently.

5. AUTHORITY

- a. 44 U.S.C. Chapter 31 – Records Management by Federal Agencies (Federal Records Act) [<http://www.archives.gov/about/laws/fed-agencies.html>]
- b. 44 U.S.C. Chapter 33 – Disposal of Records [<http://www.archives.gov/about/laws/disposal-of-records.html>]
- c. 44 U.S.C. Chapter 35 – Coordination of Federal Information Policy (Paperwork Reduction Act of 1980, as amended, Paperwork Reduction Reauthorization Act of 1995, and Government Paperwork Elimination Act) [<http://www.archives.gov/about/laws/fed-information-policy.html>]
- d. 36 CFR Chapter XII, Subchapter B – Records Management [<http://www.archives.gov/about/regulations/subchapter/b.html>]
- e. OMB Circular A-123 – Management's Responsibility for Internal Control [http://www.whitehouse.gov/omb/circulars/a123/a123_rev.html]
- f. OMB Circular A-130 – Management of Federal Information Resources [<http://www.whitehouse.gov/omb/circulars/a130/a130trans4.html>]
- g. U.S. EPA, National Security Emergency Preparedness Policy (Order 2040.1A1)
- h. U.S. EPA, Uniform Continuity of Operations (COOP) Plan Policy (Order 2030.1)
- i. Federal Emergency Management Agency (FEMA) Federal Preparedness Circular 65 - Federal Executive Branch Continuity of Operations (COOP)

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6. POLICY

This Policy establishes specific requirements under which EPA records are effectively and efficiently managed throughout their lifecycle to facilitate the accomplishment of EPA's programmatic and administrative missions, to preserve official EPA records in accordance with applicable statutory and regulatory requirements, and to promote access to information by EPA staff, EPA partners, and the public, as appropriate.

Each office within EPA is required to establish and maintain a records management program with the following minimum requirements:

- a. Create, receive, and maintain official records providing adequate and proper documentation and evidence of EPA's activities.
- b. Manage records, in any format, in accordance with applicable statutes, regulations, and EPA policy and guidance.
- c. Maintain electronic records, including electronic mail records, in the enterprise-wide electronic content management system, when available, and migrate legacy systems, when feasible.
- d. Print and file records in a paper recordkeeping file system when an enterprise-wide electronic content management system is not available.
- e. Maintain records according to the Agency-wide file structure allowing for timely access and retrieval.
- f. Secure records to protect the legal and financial rights of the government and persons affected by government activities.
- g. Implement a plan to protect vital records and assess damage to and the recovery of any records affected by an emergency or disaster.
- h. Ensure instructions for disposition of records as specified in the approved records schedules.

7. RELATED DOCUMENTS

- a. EPA Records Management Manual.
 - b. Additional documents, including forms, guidance and other relevant information are maintained on EPA's records management Web site. [<http://www.epa.gov/records/>]
 - c. International Standard ISO 15489-1:2001 – Information and documentation – Records management – Part 1: General.
 - d. International Standard ISO/TR 15489-2:2001 – Information and documentation – Records management – Part 2: Guidelines.
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8. ROLES AND RESPONSIBILITIES

- a. The Administrator is responsible for creating and preserving records that adequately and properly document the organization, functions, policies, decisions, procedures, and essential transactions of EPA. This responsibility is delegated to the Assistant Administrator for the Office of Environmental Information (OEI).
- b. OEI is responsible for leadership, planning, overall policy, guidance, and general oversight of records management in the Agency, and its incorporation into the broader information resources management framework. OEI will:
 1. Incorporate records management requirements and policies into the Agency's overall information resources management (IRM) policy and planning.
 2. Designate an Agency Records Officer responsible for:
 - Leading and managing the Agency-wide national records management program.
 - Ensuring Agency senior officials are aware of their programmatic and individual records management responsibilities.
 - Advising EPA on records management issues and developing Agency-wide records management policies, procedures, guidance, and training materials.
 - Coordinating the approval of the Agency's records schedules and the transfer of records to the National Archives.
 - Coordinating records management issues with other federal agencies, including federal oversight agencies such as the Office of Management and Budget (OMB), National Archives and Records Administration (NARA), and the General Services Administration (GSA).
 - Providing technical advice and training to all Agency organizations on establishing and maintaining effective records management programs.
 - Evaluating recordkeeping practices to determine the effectiveness of the program.
 3. Promulgate and communicate Agency-wide policies and guidance that reflect records management missions and goals and incorporate federal requirements.
 4. Designate other records management staff as required by regulations.

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5. Assign overall responsibility for the records management aspects of centrally provided information technology infrastructure, including national local area network applications.
 6. Ensure that senior Agency officials are aware of their records management responsibilities.
 7. Conduct periodic evaluations of records management programs within the Agency as part of the Agency's IRM review and oversight program.
- c. Assistant Administrators, Chief Financial Officer, General Counsel, Inspector General, Regional Administrators, and Laboratory/Center/Office Directors are responsible for:
1. Designating a Records Liaison Officer (RLO) accountable to the Information Management Official (IMO) or other official designated to oversee the program.
 2. Ensuring the RLO has adequate skills, resources, time, and appropriate authority to perform the job.
 3. Implementing a records management program within their area of responsibility to accomplish the objectives identified in federal regulations and EPA policies and procedures. Minimum program components include responsibilities for:
 - Identifying recordkeeping requirements for major programmatic and administrative records.
 - Evaluating the value of records within their span of responsibility to serve as a basis for assigning records retention and disposition instructions, determining which records within their physical or legal custody are vital, and implementing the most responsive and cost-effective means for managing records.
 - Developing file plans and indexing approaches where appropriate to simplify the use of, access to, and integration of information within the organization.
 - Drafting and updating records schedules for records created and maintained by the organization.
 - Implementing approved records schedules to ensure that records are not destroyed without proper authorization.
 - Reviewing file plans and procedures at least every three years to ensure they are current and updating them as necessary.
 - Assisting in planning and implementing information management technology and reviewing the purchase of

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records management equipment and services to ensure they conform to federal statutory and regulatory requirements.

- Implementing a vital records plan to ensure the continuation of key functions and activities in the event of an emergency or disaster.
 - Providing oversight for contractors, grantees, or other non-EPA employees managing official EPA records.
 - Providing records management briefings for all managers and training to staff within their organizations.
4. Developing records management oversight roles and communication networks with all program units including field offices and other facilities, as appropriate, to ensure that the records management program is implemented at all sites under their jurisdiction.
 5. Developing and disseminating directives and operating procedures, as needed, to supplement Agency-wide policy to meet the unique records management needs of their organizations and to support a records management program within the organization.
 6. Ensuring records and other types of required documentary materials are not unlawfully removed from EPA by current or departing officials, employees, or agents.
- d. The General Counsel assists in determining what records are needed to provide adequate and proper documentation of EPA activities and in specifying appropriate disposition for EPA records.
 - e. The Inspector General assists in determining the retention of Agency records that may be needed for internal investigation and audit purposes.
 - f. Headquarters, Regional, Laboratory/Center/Office RLOs are responsible for:
 1. Creating and updating procedures for their offices in accordance with established EPA and program policies.
 2. Performing evaluations of their records management and vital records program.
 3. Developing file plans and procedures so records are organized and can be found when needed.
 4. Assisting with disposition activities, including retirement of inactive records, transfer of permanent records to the National Archives, and destruction in accordance with approved records schedules.
 5. Reviewing office records schedules annually to ensure they are current, and initiate changes if not.
 6. Ensuring confidential records are protected in accordance with

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federal and EPA requirements, and keeping access lists to ensure sensitive information is released only to authorized individuals.

7. Coordinating the identification and maintenance of vital records and submitting an annual list of vital records through senior management to the Agency Records Officer.
 8. Initiating and keeping records retirement, transfer, and destruction documentation.
 9. Conducting briefings and training sessions on the records management program.
 10. Reviewing and recommending requests for records equipment, services, and supplies.
 11. Organizing, maintaining, and training a network of records contacts within the organization.
- g. Information resources and system managers are responsible for:
1. Working with the local RLO, the Agency Records Officer and NARA to establish and update records schedules for electronic systems.
 2. Implementing proper recordkeeping procedures for existing information systems and ensuring recordkeeping requirements are included in proposed systems.
 3. Ensuring that information systems intended to carry out electronic records management comply with NARA's and EPA's requirements for electronic recordkeeping systems.
 4. Maintaining electronic information systems in accordance with approved records schedules and NARA requirements.
 5. Working with their RLO to transfer permanent systems to the National Archives in accordance with approved records schedules and NARA requirements.
 6. Ensuring that Internet and intranet postings containing official records are maintained in accordance with EPA's recordkeeping requirements.
- h. Continuity of Operations (COOP) Program planners are responsible for:
1. Working with records management staff to implement the vital records plan to ensure the continuation of designated COOP essential functions.
 2. Ensuring that vital records are accessible from designated COOP locations.

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- i. All EPA employees are responsible for:
 - 1. Creating and managing the records necessary to document the Agency's official activities and actions, including those records generated by EPA contractors and grantees, in accordance with EPA recordkeeping requirements.
 - 2. Destroying records only in accordance with approved records schedules and never removing records from EPA without authorization.
 - 3. Filing records for safe storage and efficient retrieval and maintaining personal papers and nonrecord materials separately from official EPA records.

9. DEFINITIONS

Definitions are found on EPA's records management Web site.
[<http://www.epa.gov/records/gloss/>]

10. WAIVERS

- a. **Waiver Process.** The Agency Records Officer may grant waivers to any provisions of this Policy for sufficient cause.
- b. **Applications.** Applications for waivers to specific provisions should contain (1) identification of the Policy provision; (2) a listing of reasons why the Policy cannot be applied or maintained; (3) an assessment of impacts resulting from non-compliance; and (4) the signature of the AA, RA or Laboratory/Center/Office Director, the Chief Financial Officer, the General Counsel, or the Inspector General responsible for the records management program in question.
- c. **Notification.** The Agency Records Officer will notify the requesting office in writing of the disposition of the decision on the waiver request within 60 days of receipt of the request.

11. RELATED PROCEDURES AND GUIDELINES

Required procedures and implementation guidelines for this Policy are found on the records management Web site. [<http://www.epa.gov/records/>] Supporting procedures to implement this Policy at the Program Office or other Administrative level must be approved by the Agency Records Officer in OEI.

12. MATERIAL SUPERSEDED

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EPA *IRM Policy Manual*, Chapter 10, 1996

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Vital Records Order (Order 2160.1)

13. ADDITIONAL INFORMATION

For further information about this Policy, please contact the EPA Office of Environmental Information, Office of Information Collection.



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and Chief Information Officer
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