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Office of Administrative Services  
Freedom of Information Act Office

February 14, 2017

Mr. John Greenwald  
The Black Vault

[REDACTED]  
[REDACTED]

Dear Mr. Greenwald:

This letter is in response to your U.S. General Services Administration Freedom of Information Act (FOIA) request, GSA-2017-000534, submitted on February 7, 2017, in which you requested:

“Records pertaining to a copy of records, electronic or otherwise, of the following: CIO P 1820.1 CHGE 4 GSA Records Maintenance and Disposition System.”

Enclosed please find 22 pages of records responsive to your request, consisting of a copy of the CIO P 1820.1 CHGE 4 GSA Records Maintenance and Disposition System.

This is public information, located on our GSA’s website at:

<https://www.gsa.gov/portal/directive/d0/content/629686>

This completes our action on this request. Should you have any press-related questions, please contact Ms. Milayo Olufemi, GSA Press Secretary, by email at [press@gsa.gov](mailto:press@gsa.gov). If you need additional assistance, you may also contact Ms. Audrey Brooks, GSA’s FOIA Public Liaison at (202) 205-5912 or via email at [audrey.brooks@gsa.gov](mailto:audrey.brooks@gsa.gov).

Sincerely,

*Travis Lewis*

Travis Lewis  
FOIA Program Manager

Enclosure

Date: 06/08/2007

Status: Cancelled

Outdated on: 06/08/2017

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# 1820.1 CIO P GSA Records Maintenance and Disposition System

**This directive replaced by GSA Policy and Procedure [OAS P 1820.1](#) on March 7, 2014.**

GENERAL SERVICES ADMINISTRATION  
Washington, DC 20405

CIO P 1820.1 CHGE 4  
June 8, 2007

## GSA POLICY AND PROCEDURE

SUBJECT: GSA Records Maintenance and Disposition System

1. Purpose. This Order transmits the updated version of CIO P 1820.1, Chapter 3, Records Maintenance and Disposition System and completes the revision of the entire handbook, GSA Records Maintenance and Disposition System (OAD P 1820.2A).
2. Cancellations. GSA Records Maintenance and Disposition System, OAD 1820.2A, is canceled.
3. Explanation of changes. Chapter 3 was revised to reflect changes in the keeping of official files.
4. Applicability. This Order applies to all GSA associates and contractors.

Michael W. Carleton  
Chief Information Officer

GENERAL SERVICES ADMINISTRATION  
Washington, DC 20405

CIO P 1820.1 CHGE 3  
September 15, 2006

## GSA ORDER

SUBJECT: Vital Records

1. Purpose. This Order provides instructions to GSA associates on identifying and handling vital records.
2. Instructions. Replace Table of Contents of 1820.1, CHGE 2, with Table of Contents, 1820.1, CHGE 3. Insert Chapter 5 behind Chapter 4 of CIO 1820.1.

- 3. Background. The National Archives and Records Administration, in 36 CFR 1236, issues regulations requiring agencies to establish a vital records program.
- 4. Nature of revision. This order provides guidance and procedures for identifying and managing vital records by GSA associates and contractors.
- 5. Applicability. This order applies to all GSA associates and contractors.

Michael Carleton  
Chief Information Officer

Attachment

GENERAL SERVICES ADMINISTRATION  
Washington, DC 20405

CIO P 1820.1 CHGE 2  
July 18, 2006

GSA ORDER

SUBJECT: Official Records and Personal Files Maintained by GSA Associates

- 1. Purpose. This Order provides instructions to GSA associates on distinguishing between official records, personal papers and non-records, and how to properly manage each class of documentary material.
- 2. Instructions. Replace Table of Contents of 1820.1, CHGE 1, with Table of Contents, 1820.1, CHGE 2. Insert Chapter 2 behind Chapter 1 of CIO 1820.1.
- 3. Background. GSA associates create or collect many forms of documentary materials in the course of their workday. Only official records are subject to the management requirements of the Federal Records Act but GSA is required under 36 CFR Chapter 12 to issue standards for managing non-records and personal papers and files created by GSA associates.
- 4. Nature of revision. This Order provides guidance and procedures for managing all documentary materials produced, created, or received by GSA associates and contractors.
- 5. Applicability. This Order applies to all GSA associates and contractors.

Michael W. Carleton  
Chief Information Officer

GENERAL SERVICES ADMINISTRATION  
Washington, DC 20405

CIO P 1820.1 CHGE 1  
August 16, 2005

GSA ORDER

SUBJECT: GSA Records Maintenance and Disposition System

- 1. Purpose. This Order transmits ch.1 of CIO P 1820.1. GSA Records Maintenance and Disposition System.

2. Cancellations. Ch. 1 of OAD P 1820.2A was previously cancelled.
3. Explanation of changes.
  - a. Chapter 1 of CIO P 1820.1 describes roles and responsibilities of GSA associates involved in implementing the agency's records management program.
  - b. The changes to this chapter, which was last issued in 1994, delegate responsibilities previously performed by national records management program staff to GSA associates with records management responsibilities who work in proximity to where records maintenance activities are implemented. Delegation is required to place responsibility for operational aspects of the national records management program where official records exist and to facilitate accurate and complete management of GSA records.
4. Distribution. This Order will only be transmitted electronically.
5. Filing instructions. Insert in front of ch. 4, CIO P 1820.1

MICHAEL W. CARLETON  
Chief Information Officer (I)

GENERAL SERVICES ADMINISTRATION  
Washington, DC 20405

CIO P 1820.1  
April 26, 2005

#### GSA ORDER

SUBJECT: GSA Records Maintenance and Disposition System

1. Purpose. This order transmits a revised HB, GSA Records Maintenance and Disposition System (the Records Handbook).
2. Cancellations. GSA Records Maintenance and Disposition System (OAD P 1820.2), chapter 4, is canceled.
3. Explanation of changes.
  - a. This order replaces the previous chapter 4, Maintenance and Disposition of Non-Textual Records with Maintenance and Disposition of Electronic Records
  - b. This order establishes CIO P 1820.1, reflecting the transfer of the Records Management Program from the Office of the Chief People Officer to the Office of the Chief Information Officer.

MICHAEL W. CARLETON  
Chief Information Officer

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## CHAPTER 1. AUTHORITY AND RESPONSIBILITY

1. Applicability. This handbook applies to all organizational elements of GSA in the Central Office and regional offices, including field activities, involved in the creation, maintenance, use, and disposition of GSA records.
2. Contents. This handbook contains instructions on administering the internal GSA records management program. Descriptions of and approved disposition instructions for records created or received by GSA program offices are contained in record schedules issued by the GSA Records Officer.
3. Statutory authority for records management.

a. Two statutes govern most aspects of the management of Federal records: the Federal Records Act of 1950 (chapters 21, 29, 31, and 33 of 44 U.S.C.), the Paperwork Reduction Act of 1995 (chapter 35 of 44 U.S.C.) The Federal Records Act establishes the basis for records management programs and specifies the responsibilities of Federal agencies in managing their records. The Paperwork Reduction Act incorporates records management into the broader program of Federal information resources management.

b. Two agencies share oversight responsibilities for records management in the Federal Government.

(1) The Office of Management and Budget (OMB) is responsible for information resources management policy.

(2) The National Archives and Records Administration (NARA) ensures that the policies and transactions of the Federal Government are accurately documented by Federal agencies. NARA does so by:

- issuing standards for recordkeeping
- approving the final disposition of records received, created and maintained by Federal agencies in the course of business
- authorizing the final disposition of records

NARA also operates the Federal records centers and preserves records that have sufficient historical or other value.

4. Objectives. The GSA Records Maintenance and Disposition System, under the statutes governing Federal records management, promotes economic and efficient methods of creating, maintaining, using, and disposing of records. The objectives of the internal GSA Records Management Program are to:

a. Create and preserve records documenting the organization, functions, policies, decisions, procedures, and transactions of GSA; also, records necessary to protect the legal and financial rights of the Government and of persons affected by GSA's activities (44 U.S.C. 3101).

b. Establish and maintain an active program for the economical and efficient management of GSA's records (44 U.S.C. 3102).

c. Apply standards, procedures, and techniques established by GSA and NARA to improve the management of records; for example, promote proper maintenance of permanent records; classify temporary records for timely disposal; minimize duplicate records; standardize procedures for finding and using records in all media, including those loaned to or shared with other Federal agencies; etc. (44 U.S.C. 3102).

d. Establish effective management controls over the creation, maintenance, use, and disposition of records; for example, provide a network of authorized file stations responsible for managing all records created or retained at that station, survey the operation of the records program at all organizational levels, etc. (44 U.S.C. 3102).

e. Provide control schedules for the cutoff, retirement, and destruction of records (44 U.S.C. 3303).

f. Ensure compliance with control schedules issued and approved by NARA (44 U.S.C. 3303a).

g. Destroy GSA records only with NARA's approval and according to established procedures (44 U.S.C. 3314).

h. Prevent the unauthorized removal or destruction of GSA records (44 U.S.C. 3105).

i. Comply with all external records management regulations issued by NARA (44 U.S.C. 3102, 3303).

5. Responsibilities.

a. IT Policy Division/GSA National Records Program Officer. The IT Policy Division (IEP), Office of Enterprise IT Investment Portfolio & Policy (IE), Office of the Chief Information Officer (I) provides GSA-wide program direction and technical assistance for records management. The GSA Records Officer is an associate serving in the IT Policy Division. The GSA National Records Program Officer's responsibilities include:

(1) Plans, develops, administers, and evaluates the internal GSA Records Management Program;

(2) Serves as the liaison office with NARA on matters pertaining to records management;

(3) Maintains liaison with the General Accounting Office (GAO) on the disposal of financial records and other records under the Comptroller General's oversight;

(4) Develops systems, standards, and procedures for the management of current records;

(5) Develops disposal standards and procedures for the systematic removal of inactive records from office space;

(6) Exercises exclusive authority within GSA for the dissemination of records disposal instructions;

- (7) Issues guidance and procedures governing the Vital Records Program
- (8) Coordinates Central Office and regional Records Officer operational activities.
- (9) Provides training opportunities in records management procedures and responsibilities for associates at all levels.

(10) Administers the NARA/GSA Memorandum of Agreement covering the fee-for-service offsite storage, reference, and disposal of GSA records stored in NARA's Federal Records Center facilities.

(11) In conjunction with SSO Records Officers, assists program offices in developing current files plans and monitors compliance with this requirement at the SSO and Regional level.

(12) Ensures compliance with the Records Program via oversight and annual review of records management activities

b. Service and Staff Office (SSO) Records Officers. Each GSA Service and Staff Office (SSO) is responsible for implementing and operating an effective records management program. To accomplish this, Heads of Services and Staff Offices must designate a qualified records officer to operate the records management program within their area of jurisdiction. A copy of each records officer designation (or redesignation) must be forwarded to IEP and to the Federal Records Center (FRC). Each of these Records Officers:

- (1) Documents the legal, regulatory, and administrative requirements for records creation and maintenance applying to the functions and programs of each file station in Central Office and to regional programs.
- (2) Maintains a current inventory of all Central Office records retired to Federal records centers and provides assistance for retrieval;
- (3) Reviews, approves, and maintains current file plans and provides technical advice and assistance to Central Office personnel in planning and organizing an efficient and operational file system;
- (4) Surveys, at least every 5 years, the operation of the records program at all organizational levels within Central Office and provides results to the GSA National Records Program Officer;
- (5) Implements the Vital Records program within the SSO; and
- (6) Trains associates in records maintenance and disposition or arranges for such training.

c. Regional Records Officers. Each Regional Administrator is responsible for implementing and operating an effective records management program. To accomplish this, Regional Administrators must designate a qualified records officer to operate the records management program within their area of jurisdiction. A copy of each records officer designation (or redesignation) must be forwarded to IEP in Central Office and to the appropriate Federal records center. Regional Records Officers provide records maintenance and disposition program support and technical assistance for each region. Specifically, each regional records officer:

- (1) Periodically surveys the operation of the program at all organizational levels within area of jurisdiction (see ch. 1-6) and provides results on request to the GSA National Records Program Officer;
- (2) Serves as liaison with appropriate regional officials to achieve a minimum production in the type and number of copies of records;
- (3) Assists service-level associates in developing, reviewing, approving and maintaining current file plans and provides technical advice and assistance to regional associates in planning and organizing an efficient and operational file system;
- (4) Trains personnel in records maintenance and disposition or arranges for the training;
- (5) Maintains an inventory of retired records and provides assistance for retrieval;
- (6) Ensures that the maintenance and disposition of records are in accordance with CIO 1820.1 and disposition schedules approved by NARA and issued by the GSA Records Officer in the GSA File Plan (published on local GNNI servers); and
- (7) Implements the vital records component of the Emergency Preparedness Program within the region; ensures that vital records are selected and shipped to the GSA Vital Records Depository or alternate sites; and implements directives designating individuals assigned to duties during emergency operations.

d. Records liaison officers (RLO). To assist SSO records officers, each Central Office Assistant Commissioner (or equivalent) and the Head of each Regional Service and Staff Office must designate an RLO(s). Each RLO:

- (1) Provides technical assistance as requested or directed at individual file stations;
- (2) In conjunction with the supervisor, ensures efficient operation of individual file stations;
- (3) Provides instructions and assistance in transferring records to Federal Records Centers (FRC's) and in referencing records retired to FRC's;
- (4) Instructs and aids records custodians in preparing GSA Form 2039, Records Maintenance Plan, and in installing the GSA records system at each file station;
- (5) Grants exceptions for keeping duplicate records that are essential for the efficient operation of an office;
- (6) Requests exceptions to, or submits to the SSO records officer recommendations for, new or revised documentation, maintenance, and disposition instructions; and
- (7) Recommends to the records officer candidates (records custodians) for files maintenance and records disposition training.

e. Records custodians. Records custodians are responsible for the operation of the GSA Records Maintenance and Disposition System at the individual file station. Each records custodian:

- (1) Maintains records under the procedures outlined in chs. 3 and 4;
- (2) Prepares and keeps records plans current;
- (3) Ensures that all records created and maintained by the organization, including those maintained by program personnel, are included in the file station

records plan;

(4) Prepares records, including corresponding paperwork (SF 135, Records Transmittal and Receipt, and shelf list), for shipment to the Federal records center;

(5) Destroys eligible records at individual file stations under authorized disposition instructions;

(6) Maintains an inventory of all records belonging to an office, including those destroyed, stored in low-cost storage space, and retired to Federal records centers during the fiscal year, for reporting purposes; and

(7) Requests, in collaboration with supervisor, exceptions to, or submits to the RLO recommendations for new or revised documentation, maintenance, and disposition instructions.

6. Records surveys.

a. SSO records officers periodically survey the operation of the records program at all organizational levels in their area of jurisdiction or at any other time a survey is needed. For example, a reorganization, change in policy, new legislation, or any other action affecting the creation, maintenance, use and disposition of GSA records may require a survey.

b. Record surveys must include all records, whether stored on paper, microfilm, electronic, or other media and whether or not these records are part of an approved record schedule. NARA requires GSA to schedule all records, including electronic data bases, and record surveys are one of the primary ways records officers identify unscheduled record systems. GSA E-Form 3475, File Station Survey Checklist, includes a section on the survey of electronic records. This form is available from the GSA National Records Program Officer on request.

c. On completing the survey, the SSO Records Officer will send a memorandum advising program officials of the findings and recommendations. The GSA National Records Program Officer shall receive a copy of these memorandums. The memorandum should include:

(1) A brief summary of the findings and recommendations;

(2) A copy of GSA E-Form(s) 3475; and

(3) If appropriate, an estimate of the cost savings that would result from implementing the recommendations. For example, savings from (1) automating certain record series, (2) identifying records whose retirement or disposal dates have lapsed (cite volume of records), (3) identifying filing equipment that can be excessed, or (4) any other recommendation or improvement that would save money.

7. Changes in and improvement of the GSA records system.

a. General. If a records system is to be an effective management tool, the users of that system must make necessary changes and improvements. The GSA National Records Program Officer coordinates and clears any proposed changes to this handbook. New or revised standards and techniques are created to ensure the proper disposal or retirement of records. Changes and improvements may be recommended by any associate at any time as follows:

(1) In Central Office, submit any changes and improvements through the RLO to the SSO Records Officer, who will evaluate them for submission to the GSA National Records Program Officer

(2) In the regions, submit changes and improvements through the RLO/regional records officer to the GSA National Records Program Officer who will coordinate regional suggestions with SSO records officers. Each regional records officer should submit recommendations, provide information, or otherwise assist the GSA National Records Program Officer in prescribing techniques, standards, and procedures for organizing, maintaining, using, and disposing of records.

b. Records officers. SSO records officers and regional records officers provide technical assistance to program officials within their areas of jurisdiction on the adequacy and propriety of documentation. This includes clearing any Central Office or regional directive that contains instruction on the maintenance and disposition of records. Records disposition instructions may not be issued in any directive except this handbook. However, a directive that requires creation of records may cite the appropriate chapter or this handbook.

c. IT Policy Branch (IEP). IEP coordinates and clears any proposed changes to this handbook.

8. Requests for technical assistance from NARA. All requests in Central Office for technical assistance from NARA regarding the GSA Records Maintenance and Disposition System must be coordinated with the GSA National Records Program Officer. Regional offices must coordinate these requests with their regional records officer, who in turn consults with the GSA National Records Program Officer.

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## CHAPTER 2. OFFICIAL RECORDS AND PERSONAL FILES MAINTAINED BY GSA ASSOCIATES

1. General. All Federal associates and contractors who do business with the Federal Government must understand that official records belong to the Government, not to any person, regardless of the position the person may occupy. This chapter describes how to manage records in the custody of GSA associates and establishes the conditions under which associates may keep reference materials and personal files in office space.

2. Purpose. All Federal agencies are responsible for creating and preserving records that adequately and properly document "the organization, functions, policies, decisions, procedures, and essential transactions of the agency" (44 U.S.C. 3101). Complete and accurate records are essential to:

- a. Protect the legal, financial, and other rights of the Government and the people;
- b. Ensure continuity and consistency in administration;
- c. Assist agency officials and their successors in making informed decisions; and
- d. Provide the information required by the Congress and others for overseeing the agency's activities.

3. Laws governing records management. The statutes that govern the management of Federal records are cited in Chapter 1 of this handbook.. Penalties for unlawfully removing or destroying records are outlined in 18 U.S.C. 2071.

### 4. Responsibilities.

a. Signatory officials. The following officials are considered signatory officials and are responsible for ensuring that GSA records are maintained as this handbook requires:

- (1) The Administrator;
- (2) The Deputy Administrator;
- (3) Regional Administrators;
- (4) Heads of Services and Staff Offices and other officials above the Division Director or equivalent level;
- (5) Division Directors;
- (6) Branch Chiefs;
- (7) Section Chiefs; and
- (8) Career Civil Service associates and political appointees serving in positions equal to or comparable to those listed above.

### b. GSA associates.

(1) Responsibilities for GSA records. GSA associates must immediately report to the Office of Inspector General any threatened or actual unlawful removal, defacing, alteration, or destruction of official records.

(2) Central Office and regional records officers. Central Office and regional records officers must ensure that periodic inspections of the official records maintained by GSA associates take place to certify materials are maintained under the provisions of this handbook.

c. Contractors. Contractors who do business with the Federal Government must clearly identify which of the documents they create or maintain are Federal records and must maintain these records in accordance with the requirements of this handbook.

### 5. Records.

a. Definition. The term "records," according to 44 U.S.C. 3301, includes all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, that are:

- (1) Made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business; and
- (2) 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.

b. To summarize in plain language, if documentary material was made or received by a GSA associate in the course of performance of their assigned duties it is assumed to be a Federal record, and safeguards to prevent removal from the official record should be instituted.

### c. Examples. The following documents are examples of official records:

- (1) The official file copy of any Government business document;
- (2) Any classified document;
- (3) Any document containing information required to transact the official business of GSA;
- (4) Any document used in or documenting an official decision of the agency;
- (5) Any information provided to GSA that has been identified as a trade secret or proprietary information; and
- (6) Electronic data in shared information systems.

6. Non-record materials and copies of records.

a. Definition: Informational materials kept for convenience of reference.

b. Examples. The statute that defines records (44 U.S.C. 3301; cited in par. 5a) sets out three types of non-record materials:

(1) Extra copies of documents and other materials that an associate drafts, signs, reviews, or otherwise acts upon, provided that the official record copies are properly filed;

(2) Library materials acquired solely for reference; and

(3) Stocks of forms, publications and processed documents.

7. Personal files.

a. Definition: Documentary materials containing information that is created and maintained solely for personal use and reference.

b. Examples. Papers that may be considered personal include:

(1) Personal calendars, appointment books, schedules, and diaries created solely for the convenience of the GSA associate in managing his/her time; and

(2) Handwritten notes, reminders, meeting notes, and summaries of telephone calls, provided that all official information in them is incorporated in a memo for the record and placed in the official file.

(3) Documentary materials created on Government time, using Government equipment and supplies, which do not document Government activity and therefore do not meet the standard for Federal record status, or personal copies of Federal records of interest to the associate

c. Maintenance. Personal files should be filed separately from the official record, and marked as "Personal files."

8. Determining record status. Work-related personal papers can be difficult to distinguish from agency records. Officials must take care to file personal papers separately from agency records, and must extract official information included in personal papers and copy or place it in an official file. Keep in mind that the courts may determine that some materials considered personal papers are agency records, depending on the circumstances surrounding their creation, maintenance and use, and disposition. The courts have developed guidance regarding these circumstances in deciding FOIA cases. The meaning of "agency record" for purposes of FOIA is broader than the definition of "records" found in 44 U.S.C. 3301, cited in par. 5a, above.

a. Criteria. To determine whether or not a document is an agency record, subject to the FOIA and the PA apply the following criteria:

(1) Creation. Was the document created or received by an agency associate on agency time, with agency materials, at agency expense? If not, the document is unlikely to be a record. If the answer is yes, the document may or may not be a record, depending on other considerations.

(2) Content. Does the document contain substantive information about agency business? Does the document contain personal as well as official information? If it does not contain official information, then it is unlikely to be a record. If it contains official information, it may or may not be a record, depending on other factors.

(3) Purpose. Was the document created solely for an individual's personal convenience? If so, it is probably not a record. If it was created to facilitate agency business, it still may or may not be an agency record, depending on its distribution and use by other agency associates.

(4) Distribution. Was the document distributed to anyone else for agency business or official purpose? If so, it is likely to be an agency record.

(5) Use. To what extent was the document used by the author or others to conduct agency business? Reference material retained by an official is generally not considered to be an agency record; documents relied upon to provide precedents for decisions by other officials are more likely to be deemed agency records.

(6) Maintenance. Is the document kept in the author's possession, or was it placed in the agency files? If it is in the agency's files, it is likely to be an agency record.

(7) Disposition. Is the author free to dispose of the document at his or her personal discretion? Is disposal authority based on an agency disposition schedule? If the document is included in an agency disposition schedule, it is an agency record. If the document is not included in a disposition schedule and the author is completely free to destroy it at any time, it is probably not an agency record.

(8) Control. Has the agency attempted to exercise "institutional control" over the document through applicable maintenance or disposition regulations? Did the agency require that the document be created? If so, the document is likely an agency record.

(9) Segregation. Is there any practical way to segregate personal information in the document(s) from official business information? If so, the official portion of the document should be copied or extracted and placed in the agency files.

b. Maintaining proper documentation and using personal notes. Officials who create and maintain materials such as those described in par. 7 must ensure that they are used only for personal reference and convenience. Officials who use unofficial notes to support decisions, such as official performance appraisals, should enter all information necessary to support the decision into the official record, then destroy unofficial notes. Any official who retains notes to defend or support an action in an official forum risks making the notes part of the record of that action and subject to the FOIA and the PA. Therefore, even though materials such as those listed in par. 7 may be considered nonrecord, they should be filed and maintained with agency records if:

(1) They contain information, such as annotations or comments, that adds to the proper understanding of the agency's formulation and execution of basic policies, decisions, actions, or responsibilities; and

(2) The materials were circulated or made available to persons other than the creator for official purposes such as approval, comment, action, recommendation, or followup or to communicate with agency staff about agency business.

9. Maintenance and disposition of records by signatory officials.

a. In GSA, the record copy documenting a particular transaction or activity is retained by the organization responsible for the transaction or activity. Signatory officials should send record copies of documents signed by them to the office(s) responsible for the functions. These responsible offices will ensure that records are disposed of as the law requires.

b. Records created or signed by signatory officials are scheduled for retention or disposal under GSA Record Schedule 1B1, General Correspondence and

Decision Files, or are subject to the disposal instructions in the applicable subject schedule issued by the GSA Records Officer.

10. Types of information materials. This handbook divides the materials into three categories:

a. Permanent. A series whose disposition is listed in this handbook as permanent meets the definition of records under the FRA of 1950. These records have been determined by the Archivist of the United States to warrant permanent preservation by the National Archives. Permanent records are never destroyed; instead they are transferred to the National Archives in accordance with the provisions of their approved dispositions.

b. Temporary. Series whose disposition is listed in this handbook as temporary also meet the definition of records under the FRA. Records in these series are retained for the specified retention periods in order to meet administrative, legal, or regulatory requirements.

c. Disposable. Series whose disposition is listed in this handbook as disposable do not meet the definition of records under the FRA. Consisting primarily of working papers and duplicate copies of official records, they are retained at the discretion of agency officials, but not for the purpose of conducting or documenting official business. Such materials may meet the definition of records under the Freedom of Information Act or the Privacy Act. Their disposition, which is determined by the agency under the authority of 36 CFR 1222, is no less mandatory than the disposition of FRA materials.

11. Ownership of records.

a. Duplicate records. Any material that documents and supports an official action is part of the official record of that action. Consequently, copies of the same document may be part of two or more official records. For example, a document that supports a contracting action is part of the official contract case file, while a copy of the same document that supports a GSA Board of Contract Appeals (Board) case is part of the official Board case file. Both the original and the copy are separately subject to the FOIA and the PA.

b. Copies of unofficial notes. Occasionally, outside investigators or representatives of other organizations may ask GSA officials to turn over copies of unofficial notes during the course of an investigation or other action. In such cases, officials should transcribe needed documentary information to a "memo for the record," rather than provide the notes. In this way officials can ensure that the record is accurate, complete, and understandable to a third party. To the degree that these copies become part of the official investigative case file of the investigating organization, they are subject to the FOIA and the PA. However, they are not official records of the organization in which they originated, as long as they do not directly document or support an official action of that organization.

12. Accumulating and maintaining reference materials. GSA associates may accumulate extra copies of official documents for convenience or reference provided that these documents do not:

- a. Violate confidentiality required by national security, privacy, or other interests; or
- b. Exceed normal administrative economies. For example, personal reference files should not occupy office space or file cabinet space or computer disk storage needed for official business. Signatory officials as described in par 4.a above may, and should, set maximum levels of storage volume for reference materials as appropriate to the needs of the work.

13. Removal and disposition of official records: personal and nonrecord reference files.

a. Official records. Official records may not be removed from GSA custody. Records are authorized for disposal only as provided in a GSA Record Schedule issued by the GSA Records Officer or a National Archives and Records Administration (NARA) approved disposition schedule. The records of departing officials are subject to audit by the GSA Records Officer or the appropriate records liaison officer.

b. Personal records and unclassified nonrecord reference materials. Personal records and nonrecord information may be destroyed or removed at the discretion of the associate accumulating the information. Officials should destroy sensitive nonrecord documents as soon as possible after they enter necessary documentary information into an official record. The removal of personal records by departing associates should be documented by their supervisors as part of the normal separation clearance process.

14. Impact of computer systems and office automation technology. The use of automated information systems to create and store record information may change the way the records are maintained. Administrative support personnel should ensure that paper documents are properly created, copied, coded, and filed. However, information systems that contain official records must be designed in such a way that these functions are performed automatically or by a qualified end-user. Chapter 4 of this handbook provides necessary guidance regarding electronic records management.

a. Deleting official documents. Some systems make it simple for the user to accidentally delete documents, or when revising documents, to erase previous versions. Electronic mail systems, for example, are not appropriate recordkeeping environments. Electronic mail messages which meet the criteria for an official record should be managed in accordance with the requirements in Chapter 4 of this handbook. Information systems which contain, or are the designated repository for official records, must be designed in such a way that official records are properly retained.

b. Deleting personal documents. Nonrecord reference material, maintained separately from official records, may be deleted at the discretion of the associate maintaining it.

CHAPTER 3 MAINTENANCE AND DISPOSITION OF OFFICIAL FILES

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### CHAPTER 3. MAINTENANCE AND DISPOSITION OF OFFICIAL FILES

#### PART 1. CLASSIFICATION AND ARRANGEMENT

1. **General.** Records are created to document the performance of functions, processes, and transactions. These functions, processes, and transactions serve as the best basis for the identification, arrangement, and disposition of records. The GSA File Plan, issued by the GSA National Records Officer, divides most of the total accumulation of records into the program areas by subject. The File Plan dictates the basic arrangement of records for disposition purposes. Each program office is responsible for ensuring that their recordkeeping systems are compliant, or can be made compliant, with the disposition standards mandated by the GSA File Plan. The only exception to this method of grouping by program area is the common administrative (housekeeping) records that are accumulated by all offices; these records are contained in Schedule 1, Information Common to Most Offices.

This chapter provides maintenance and disposition procedures for official files regardless of the medium in which they are stored. Creation and maintenance standards for official files maintained in electronic formats are detailed in ch. 4 of this handbook. All GSA employees and contractors will periodically take the Records Management for Everyone course on Online University. Records Liaison Officers, Regional Records Officers, and Files Custodians should take specialized training offered by the National Archives and Records Administration or request specialized training and presentations from the GSA National Records Officer.

a. **Primary categories, records symbols, and titles.** The GSA File Plan, issued by the GSA National Records Officer, is composed of appendixes that describe primary records categories in terms of functions, processes, transactions, and projects. Record descriptions include typical documents and form numbers, where applicable. Each primary category description is assigned a numeric-alphabetic symbol and a title (example: 5C025, Lease Records). Records custodians should use these symbols and titles, available on GSA's Insite Records Management site, on drawer, guide, and folder labels, or their electronic equivalent.

b. **Disposition instructions.** The GSA File Plan schedule lists disposition instructions next to the primary record category and occasionally next to secondary and tertiary categories. Therefore, if records are arranged by record category and are cut off correctly, those eligible for disposition may be disposed of in blocks, without detailed screening.

**Official file stations.** An official file station is a specific location where records are maintained as authorized by an approved GSA Form 2039, Records Maintenance Plan (see par. 3). Every file station must be authorized by the SSO Records Liaison Officer and must have an approved Records Maintenance Plan. Official file stations may be located at the action office level, the signatory level, or at intermediate levels. Electronic filing of documents, either on shared network drives or within document management systems, is encouraged. Storing documents on local hard drives or personal network drives is insufficient to meet the recordkeeping standards of official files.

3. **Records maintenance plans.** All official file stations will need a plan to show the primary record categories and the subdivisions used. Records custodians may use GSA Form 2039, Records Maintenance Plan or an electronic equivalent if files are maintained electronically, for this purpose. The plan provides records custodians and users with an index to the files. Offices will not accumulate all of the record categories in the File Plan (e.g., personnel units will not have building construction files)

a. **Annual review and approval.** Records custodians must complete a Records Maintenance Plan at the end of every fiscal year for each file station maintained by the office. Revise plans if changes in functions and responsibilities cause discrepancies between records listed on the plan and records needed to document current functions. Submit records plans to the SSORO or RRO each year by September 30. SSOROs and RROs will review the records plans in accordance with their duties as described in ch. 1 of this Handbook.

b. **Preparing plans and labels.** Using the record categories and cut off and disposition dates listed on the GSA File Plan, prepare a records disposition label with cutoff and disposition instructions for each primary category listed on the approved records plan. If records are maintained electronically annotate the folder or document management system's properties accordingly.

4. **Types of files.** The files in your office normally contain more than one type of record. A record series is a collection of documents with similar characteristics, or documenting similar functions, kept apart from other files in the office. Separating files into records series makes it easier to file and find papers and helps in disposing of records with different retention periods. The following are records series used in GSA:

a. Related records files. Many GSA offices maintain individual records, or a group of records, performing the same function or reflecting similar or comparable transactions. For example, mechanized time and attendance registers, credit card applications, or bills of lading are related records files. They are usually filed by name or number and cut off or destroyed after a specific length of time or on the occurrence of an event.

b. General correspondence (subject) files. Each GSA organization normally has a separate correspondence file. The file consists of original or copies of correspondence, memorandums, and other related documents. The file includes documents covering a wide variety of subjects and is easiest to use when arranged by subject. A suggested system for the arrangement of these files is the subject classification system, which may be found on the Records Management pages of Insite (see par 6 for further information on the arrangement of general correspondence or subject files).

c. Case or project files. Project or case files include information relating to a specific action, event, person, organization, location, product, or thing. The information may cover one or many subjects about a case or project, but will always be filed by a name or a number. This helps to distinguish the case or project from general correspondence, which is filed by subject. A case file documents a transaction or relationship from beginning to end. It ends with the occurrence of an event, such as contract completion, retirement of an individual, or completion of a project. The following are a few examples of case files:

- (1) Official personnel records;
- (2) Contracts;
- (3) Directives case files;
- (4) Investigations; and
- (5) Audits.

A project is a case file on a specific project or study that is more voluminous than the normal case file. This file contains information relating to various phases of the project such as proposals, authorizations, financing, and reports.

d. Case working papers. Offices may accumulate short-lived correspondence and working papers in connection with specific case and project files. Such documents include background and working papers such as reference materials and data obtained for the case or project; data analyses and summaries, drafts, and other preliminary information leading to final results or findings. The most common types of working papers are routine requests for case reports or data, routine correspondence concerning the administration of a case or project, or extra copies of documents or reference material. Separate case working papers from the important case documents for ease of disposal and to make it easier to identify more important papers. Offices may file working papers in the same folder as essential papers, if they are kept separate from official record documents. For example, working papers may be fastened to one side of the folder while essential papers are filed on the other. Or, working papers may be filed in a separate folder with the folder of essential papers.

e. Transitory files. A lot of day-to-day correspondence and other information of short-term interest should not be filed in subject correspondence files. These records involve routine transactions or do not contain information of continuing reference value. They include transmittal letters or forms, requests for routine information or publications, communications correcting reports or records, or other documents not requiring action by the receiving office. The recognition and separate maintenance of transitory documents is important. Transitory information that has served its purpose should be immediately destroyed. Transitory correspondence temporarily needed for reference is normally filed by date so that the papers may be easily destroyed after a short retention period, usually no longer than 120 days. Use a folder for each month. At the beginning of each month, place the folder used the previous month behind the other three, until all four folders have been used. At the beginning of the fifth month, destroy the contents of the folder containing the oldest information and reuse the folder for the current month.

f. Technical reference files. Most offices receive copies of publications, directives, special reports and studies, and so forth. File only those that are current and of significant reference value. Technical reference files are usually maintained by offices involved in statistical reporting, research, development, and the dissemination of information. Keep these files current by replacing superseded material, removing obsolete material, and adding new material.

g. Convenience files. Offices should maintain extra, nonrecord copies of correspondence, forms, and other papers only when justified to satisfy a reference need. Improperly used, duplicate files waste filing equipment, supplies, and office space, and increase reproduction costs. They also waste valuable employee time. Examples of convenience files include:

- (1) Reading files. Extra copies of outgoing correspondence arranged in date sequence and maintained or circulated for information.
- (2) Suspense files. These files are also known as tickler, pending, or follow-up files and consist of copies of correspondence or other information that require action or attention at later dates. Documents in suspense files are arranged by date and serve as a reminder to prepare reports or replies.
- (3) Policy reference files. Offices may keep copies of selected documents containing policies, precedents, procedures, and instructions to use as ready reference in conducting daily business or as training aids for new personnel. Keep these files current by replacing superseded material, removing obsolete material, and adding new material.

5. Files arrangement. The symbols and titles of primary records categories in the records schedules issued by the GSA Records Officer provide the basic framework for identifying and arranging files. These records symbols and titles are placed on file, folder, or divider labels to identify the records contained in the folders. Records custodians may further subdivide files as necessary to help users locate documents. The GSA records system does not generally prescribe subdivisions. Custodians should subdivide files to meet the requirements of the organizations served by them. The following are methods of subdividing primary records categories.

a. Alphabetical arrangements.

- (1) Subject. Arrange files by group or broad subject title. Use numbers or codes to designate subcategories.
- (2) Proper name. Arrange files of names of persons by last name and then by first name and middle initial. When identical names occur, arrange them by other distinguishing features, such as date of birth or Social Security number.
- (3) Geographical location. Use one of the following arrangements for documents referred to by geographical location:
  - (a) Arrange documents by region number and thereunder alphabetically, first by name of the geographical area, region, territory, etc., and then by progressively specific designation and name as required; or
  - (b) Arrange documents alphabetically, first by specific name or location and then by general name or location.
- (4) Organizational. Use one of the following arrangements for documents referred to by name of a GSA or other organizational designation:
  - (a) For GSA organizations. Arrange documents alphabetically, first by general type of organization, such as service, office, or division, and then by the specific name or number.

(b) Other organizations. File documents on other agencies or organizations as the title is written, except when the title includes the name of an individual. In these cases, file as for proper names.

b. Numerical arrangements.

(1) Date. Date order is usually appropriate for documents in the smallest file subdivision, such as within a case or folder. However, reference or disposition needs may require an organization to arrange an entire file in overall date order by year, month, and day.

(2) Straight numerical. Arrange documents in straight numerical sequence: 1, 2, 3, 4, etc. Use this method for files adding fewer than 10,000 documents a year.

(3) Duplex numbers. Duplex numbers consist of two or more parts separated by a dash, space, or comma (for example, 29-234, 29-430, 30-105). Arrange documents in straight numerical sequence by the first part of the number and then by succeeding parts.

(4) Terminal digits. Arrange documents in straight numerical order, using the last two or three digits of a number. For example, file documents numbered 121,458; 3,458; and 972,458 together and ahead of documents numbered 1,459; 121,459; and 3,460. Use this method for large files adding more than 10,000 numbered documents a year, especially if reference is low.

6. Subject classification system for general correspondence (subject) files.

a. The subject classification system is designed to help group general correspondence and related information, described in par. 4b and filed under Schedule 1B of the File Plan, by the function to which the information pertains. It provides a uniform system for organizing the small but important collection of files that do not lend themselves to arrangement by name or number. For example, a letter regarding contract procedures in general or the processing of purchase orders in general is considered to be general correspondence and is normally filed in the general correspondence file (Schedule 1B1). A letter regarding a specific contract or a specific purchase transaction is not normally considered to be general correspondence; put the document in the case file documenting the specific transaction.

b. Use the subject classification system to organize file folders if there are many documents filed under Schedule 1B that need to be organized by subject. Its use on the file plan is optional.

## PART 2. MAINTENANCE OF PAPER FILES

7. General. Planning and organizing the records of an office effectively requires efficient files maintenance procedures. Without proper maintenance, reference service lags, and as the overall filing system deteriorates, papers become difficult to find or are lost. The provisions of part 2 are intended to promote efficient and economical practices in files maintenance and reference. See ch. 4 for the maintenance of official files maintained electronically.

8. Inspecting papers to be filed. Papers should be filed daily whenever possible. Prompt filing is necessary to ensure the immediate availability of requested records. The records custodian should inspect all papers received for filing to ensure that:

- a. Records resulting from each separate function of the office are correctly identified when created and are maintained separately through the use of separate file folders, drawers, or other containers;
- b. Documentation is complete (when missing papers or copies cannot be obtained, a notation "NR" - "no record" - should be made on the related material to be filed);
- c. Unnecessary material, such as paper clips, routing slips, and extra copies, is removed;
- d. Papers that should be filed at another file station are forwarded to that file station;
- e. Actions have been completed, such as papers requiring circulation, followup actions, or suspense control; and
- f. Damaged papers are protected. Torn pages should be repaired with transparent pressure-sensitive tape.

9. Maintaining nonrecord material. Many of the documents that pass through GSA offices are not records and need not be filed or retained. For example:

- a. Periodicals, circulars, and magazines are not Federal records and should be retained on a selective basis for only as long as they are useful. Maintain periodicals in a central reference area rather than in files.
- b. Do not create or file separate information copies of correspondence when circulated reading files will serve reference needs. Where possible, distribute and receive necessary information copies using electronic mail.
- c. Do not file directives with actions or transactions unless the directive is essential for complete documentation. File directives separately in binders and bookcases.
- d. Copies of routine communications that are not needed for record purposes should be eliminated by:
  - (1) Using transmittal slips or electronic mail to send routine information;
  - (2) Returning routine requests for printed matter with the materials sent;
  - (3) Returning routine requests with desired information noted at the bottom;
  - (4) Returning the original request with a form letter used to transmit requested information; or
  - (5) Coordinating filing efforts between or within offices to allow general use of record files. In this way, records maintained at one station will supplement rather than partially duplicate the records at another station, thus eliminating the need to file extra copies.
- e. Do not create or file duplicates of paper or electronic records. Refer to the record copy.

10. Creating files.

a. Assembling papers. Assemble papers to be filed in reverse date order. For example, assemble the outgoing correspondence with attachments or enclosures ahead of the initial incoming letter and interoffice clearance or coordination actions.

b. Filing papers. As a general rule, file assembled papers, stapled together, loosely in the folder. Attach the documents to the folder only if the entire folder is charged out frequently.

c. "Breaking" files. "Break" files (begin a new folder) whenever the folder thickness exceeds 3/4 inches. Create a new folder with the same label, but with separate inclusive dates. Place the new folder ahead of the original folder in the file. The breaking of files is not to be confused with the cutoff of files. A cutoff file is usually an inactive file; a "broken" file is still an active file that will not be cut off until the end of a fiscal or calendar year or on some other occurrence or action.

11. Security of classified papers. Classified documents must be maintained separately from unclassified records in security file cabinets or secure areas as provided in the HB, Information Security (ADM P 1025.2C). Interfiling of unclassified and classified papers is restricted to those papers directly supporting, explaining, or documenting the record of the action. In these cases it may be advisable to prepare a cross-reference sheet and place it in the unclassified file. If the volume of classified records is small, it should be maintained in a common-use office security cabinet instead of purchasing additional equipment. Cross-reference sheets should be placed in the unclassified file to show where the related classified records are located.

12. Bulky material. Bulky material should be filed separately in storage equipment suited to its size and maintained in file classification, date, or serial number order. A cross-reference to bulky material should be prepared and filed with related records and attached to the bulky material.

13. Filing aids and materials. Filing systems are organized through the proper use of guide cards, file folders, and labels. Examples of proper use of guides, folders, and labels are described and illustrated in the on the Records Management Insite pages.

a. File guides. Use file guides to divide files and identify subdivisions. Use the first position guide tab to show the primary file division, the second to show the first subdivision, and the third to show any further subdivisions.

b. File folders. For most general office files, use medium weight, 146-pound (11-point) kraft folders. However, lightweight manila folders are adequate for records that are used infrequently or are retained less than 2 years.

c. Labels.

(1) Drawer labels. Include the following information on drawer labels:

- (a) The complete file title or a general description of the files in the drawer;
- (b) Inclusive dates;
- (c) Status of the files (active or inactive);
- (d) File segment, if files occupy more than one drawer; and
- (e) GSA Form 3532, Asbestos Records label (where applicable).

(2) Guide labels. A guide label is used to indicate the contents of the folders that follow.

(3) Folder labels. Sample file folder labels are shown on the Records Management Insite pages. Labels should include the following information in three typed lines or less:

- (a) The numeric-alphabetic symbol of the primary record category;
- (b) The prescribed title of primary file categories and the specific title or number of subdivisions;
- (c) The year in parenthesis for files that are cut off annually (e.g., FY 1990) or the month and year for files that are cut off more frequently. For files in which disposition is based on the occurrence of an event, enter the date when the event occurs (e.g., deed issued for property);
- (d) Inclusive dates for folders that have been cut off; and
- (e) Any additional information that may be needed to maintain, refer to, or dispose of the records.

(4) Abbreviations used on labels. The following abbreviations are authorized on file labels:

- (a) CFA -- Current files area;
- (b) COFF -- Cut off;
- (c) DEST -- Destroy;
- (d) FRC -- Federal records center;
- (e) NPRC -- National Personnel Records Center;
- (f) PERM -- Permanent; and
- (g) PIF -- Place in inactive file.

d. Forms. The following forms are prescribed for use in GSA files:

- (1) Optional Form 22, Continuity Reference;
- (2) Optional Form 23, Chargeout Record;
- (3) Optional Form 24, Shelf File Chargeout Record (Letter size);
- (4) Optional Form 25, Shelf File Chargeout Record (Legal size); and

(5) GSA Form 2039, Records Maintenance Plan; and

14. Indexes and cross-references.

a. Some records will relate to more than one subject or case or will be requested by a different filing feature. These papers require records custodians to establish a separate index or to interfile a cross-reference. Indexing and cross-referencing should be done only when essential for reference needs. A large number of cross-references usually indicates excessive subdivision of a file(s). Indexes and cross-references can be minimized by determining the most likely way that users will request records and then filing them accordingly.

15. Chargeout systems. A chargeout system shows where a record is located after it is borrowed from a file. Use Optional Form 23, Chargeout Record, for this purpose. The borrower fills out the form and files it in place of the borrowed records. The records custodian should review files and should trace records not returned within 10 calendar days to prevent loss.

16. Inactive records. Instructions for the maintenance of cutoff files held in the same office space as active records are as follows:

a. Inactive (cutoff) files awaiting retirement or destruction must be physically separated from active files. Use separate file drawers, filing cabinets or portions thereof, or Federal record center boxes.

b. Prepare a new set of file folders at the end of the fiscal (calendar) year for records that are certain to accumulate in the new fiscal (calendar) year. Place a cross-reference or continuity reference form in the cutoff file if it is necessary to bring material forward from the old to the new file.

c. When a case file is closed, remove it immediately from the other open case files and mark it as closed (inactive). Keep closed case files in separate containers. At the end of the year, cut off closed case files and hold them until eligible for destruction or retirement.

17. Filing equipment.

a. Standard filing cabinets.

(1) Standard filing equipment for use within GSA includes letter-size two through five-drawer metal vertical and lateral filing cabinets.

(2) Generally speaking, existing information storage and retrieval systems or file stations using legal-size files should be converted to letter-size, except when it is cost-effective to retain legal-size systems. Do not develop new legal-size filing systems. Do not purchase legal-size vertical or lateral file cabinets, shelving, or similar equipment unless you can clearly demonstrate the cost-effectiveness of this equipment. When returning unneeded file cabinets, return legal-size first to reduce the maximum amount of space and cost.

b. Standard shelf files. Shelf files are used to maintain a large volume of records in a vertical position. Shelf-filing is best suited to files arranged alphabetically or in straight numerical sequence. Shelf files allow greater filing capacity per square foot of floor space than file cabinets, and permit easier reference to file folders. However, it is more difficult to drop-file material within folders. Therefore, shelf files are generally not appropriate for very large case files, or files in which large amounts of new material is interfiled.

c. Nonstandard filing equipment. An office may have file storage and retrieval requirements that are best met by using equipment other than standard file cabinets or shelves. Bulky material, such as engineering drawings or maps, require special cabinets. Files with a very high rate of reference may justify special filing equipment.

d. Matching supplies and equipment. Make sure that file supplies, such as guides and folders, are compatible with the filing equipment. For example, vertical file cabinets require folders and file guides cut so that the label is at the top of the file. Shelf files and lateral file cabinets require folders and guides cut so that the label is at the side of the file. Remember that changing folders for all files may represent a significant cost when changing from vertical cabinets to shelf files, lateral cabinets, or nonstandard files.

18. Files space.

a. Aisle space. Provide at least 28 inches of aisle space between file cabinets placed face to face. Provide at least 24 inches between inactive and 36 inches between active shelf file units.

b. Arrangement of filing equipment. Place small numbers of cabinets or shelves against walls or railings. Place large collections back to back. Be sure to place files so that the floor will support the weight of the filled cabinets or shelves. An empty 5-drawer cabinet weighs about 195 pounds. Each linear foot of letter-size material adds 30 pounds.

19. Requests for administrative equipment. Ordering procedures for filing equipment and supplies must comply with the HB, Management of GSA Internal Personal Property, ch. 2 (OAD P 7800.3). Records officers, in both the Central Office and the regions, provide advice and guidance regarding equipment that is appropriate for the records maintenance and retrieval requirements of individual program offices. Consult your records officer before making any decision regarding new records storage equipment.

### PART 3. DISPOSITION OF OFFICIAL FILES

20. General. A primary objective of the GSA records system is the preservation of records of continuing value and the elimination of all others as soon as they have served their legal, regulatory, or administrative purpose. The procedures and standards presented in this part have been established for the orderly disposition of all GSA records. For special instruction in the disposition of disposition of official files maintained electronically see ch. 4.

21. Disposition standards.

a. Mandatory application. GSA officials must maintain and dispose of records in accordance with disposition standards provided in the GSA Records Schedules issued by the GSA Records Officer. These standards have been established by GSA program officials, SSO records officers, the IT Policy Division of the Office of the Chief Information Officer (IEP), the Records Appraisal and Disposition Division (NWML) of the National Archives and Records Administration, the Archivist of the United States, and other appropriate Government agencies. Official records documenting approved records retention and disposal standards are maintained by the GSA Records Officer

b. Records unidentified by this handbook.

(1) Whenever a record series cannot be identified with a specific GSA Record Schedule, the office accumulating the records must request the



establishment of maintenance and disposition instructions using GSA Form 3629, Request for Change in GSA Records Schedule. The form is used to collect the information required by the GSA Records Officer to initiate the change and to obtain necessary approvals from the National Archives and Records Administration.

(2) Regional requests are forwarded to the regional records officer for review. If the regional records officer agrees that additional maintenance and disposition instructions are needed, he/she must forward GSA Form 3629 and a recommendation to the GSA Records Officer. If necessary, The GSA Records Officer will coordinate the request with the appropriate SSO records officer. If the regional records officer determines that the records in question can be identified with a current paragraph, he/she will so indicate and return the request to the preparing office. The regional records officer should notify the GSA Records Officer if the record descriptions need clarifying. SSO records officers should forward requests directly to the GSA Records Officer will prepare SF 115, Request for Records Disposition Authority, for all requests and submit it to NARA for approval. Until new maintenance and disposition instructions are established and issued, these records must be maintained, cut off, and disposed of according to instructions approved by the Archivist.

c. Exceptions to disposition standards. All requests for exceptions to prescribed standards for cutoff, retention, and final disposition shall be forwarded, through the appropriate records officer, to the GSA Records Officer for review and action. Each request shall include the recommendations of the records officer. Where exceptions are granted, the GSA Records Officer will provide a suffix for use with the particular record symbol concerned. This suffix and the specially authorized one-time disposition instructions must be entered on the records maintenance plan and the appropriate file label by the records custodian.

d. Changes in disposition standards. Disposition instructions in the GSA Records Schedules are changed periodically as needed to reflect changes in law or regulation or in program mission or function.

(1) Increased retention periods. If a changed instruction increases the retention period, the instruction must be applied to all records of that description regardless of where they are maintained or when they were created. Steps must be taken to ensure that inactive records are brought under the changed disposition instruction. The appropriate Federal records center must be notified by the records officer of the new disposition instructions to be applied to retired records.

(2) Reduced retention periods. If a changed instruction reduces the retention period, the instruction must be applied retroactively unless it is impractical or not economical to do so.

22. Cutoff and disposition of files. Records custodians should cut off files periodically to ensure easier disposition. Files may be cut off after a specific period of time or after the completion of an action. Most GSA records are cut off at the end of the fiscal year. Some records may be disposed of immediately after cutoff; others must be placed in an inactive file or retired to a Federal records center until the authorized retention period has expired. After the scheduled retention criteria has been met, the records are either destroyed or officially transferred to the National Archives. Records cutoff and disposition instructions are generally based on the following time periods or events:

- a. One month. Cut off at the end of each month, hold 1 month, and destroy.
- b. Three months. Cut off at the end of each quarter, hold 3 months, and destroy.
- c. Six months. Cut off semiannually as of March 31 and September 30; hold 6 months and destroy.
- d. One year. Cut off at the end of the fiscal year, hold 1 year, and destroy.
- e. Two or more years. Cut off at the end of each fiscal year; hold 2 (or more) years and destroy.
- f. Event or action. Remove files to inactive storage after a specified event occurs or action is taken. Cut off and destroy at the end of the fiscal year.
- g. Time period after an event or action. Remove files to inactive storage after a specified event occurs or action is taken. Cut off at the end of the fiscal year. Destroy at the end of the required retention period.
- h. Permanent records. Retain for specified periods, then retire to the appropriate Federal records center or, as directed by the GSA Records Officer, to the National Archives.

(1) Files retired after specific time periods. Cut off at the end of each fiscal year, hold for the required retention period, and retire.

(2) Files retired after an event or action. Remove files to inactive storage after a specified event occurs or action is taken. Cut off at the end of each fiscal year, hold for the required retention period, and retire.

23. Requirements for records disposal. Records accumulated by GSA in performing official business must not be destroyed or removed except under the authority of this handbook and the GSA Records Schedules. Intentional, unlawful destruction of public records will incur serious penalties, as outlined in 18 U.S.C. Code 641 and 2071. The GSA Records Schedules issued by the GSA Records Officer provide standards for the disposition of records after specific time periods or events.

Before any action concerning records disposal is carried out, consult the HB, GSA Privacy Act Program, ch. 3 (OAD P 1878.8) for procedures and guidance in safeguarding and disposing of records subject to the Privacy Act of 1974.

a. Nonclassified, nonsensitive records.

(1) Disposal. GSA's Federal Recycling Program encourages offices to recycle disposable paper records, provided they meet acceptable standards. The kinds of paper accepted for recycling will vary in each region and may even differ within the region itself. Paper records unacceptable for recycling and nonclassified records on other types of media may be discarded in trash containers if they cannot be sold or salvaged. To find out what kinds of paper are acceptable for recycling where you work or for more information on the Federal Recycling Program, contact your regional recycling coordinator or the Public Buildings Service.

(2) Donation. When the public interest will be served, records authorized for disposal may be donated to an eligible person, organization, institution, corporation or government (including a foreign government) that has asked for them. Forward all requests to the the GSA Records Officer. THE GSA Records Officer will send the request to the National Archives and Records Administration (NARA) for approval. A request for donation must include the following:

- (a) Name of the office that has custody of the records;
- (b) Name and address of the proposed recipient;
- (c) A description of the records with inclusive dates;
- (d) A statement providing evidence that the proposed transfer is in the best interests of the Government, or that the proposed recipient agrees not to sell the records as records or documents or that the transfer will be made without cost to the U.S. Government; and
- (e) A certification that the records contain no information the disclosure of which is prohibited by law or contrary to the public interest, and/or that records proposed for transfer to a person or commercial business are directly pertinent to the custody or operations of properties acquired from the Government, and/or that a foreign government desiring the records has an official interest in them.

b. Classified records. Maintain classified and sensitive records as prescribed in this handbook. Remember that records covered by the Privacy Act are considered sensitive and offices must certify that they have been properly destroyed. Classified or sensitive records may be destroyed by burning or, with the approval

of the GSA Security Officer, by melting, chemical decomposition, pulping, pulverizing, shredding or mutilation to the point of non recognition of the information. Use GSA Form 1237, Classified Document Accountability Record, to certify destruction of Top Secret and Secret information. Dispose of waste materials (carbon paper, typewriter ribbons, etc.) that contain classified or sensitive information in a manner to prevent unauthorized disclosure of the information. Destroy waste materials as soon as they have served their purpose; a record of destruction is not required. Destroy nonrecord material as soon as it has served its purpose, but in any case, do not retain such material more than 180 calendar days. Classified information may be destroyed at facilities selected and approved by the GSA Security Officer. For more-detailed information on the disposal of classified records, see the HB, Information Security, ch. 8 (ADM P 1025.2C).

c. Disposal of retired records. When records retired to a Federal Records Center reach their scheduled disposal date, the center will notify the CO and Regional Records Officers using NA Form 13001, Notice of Intent to Destroy Records. The records officer will then notify the program office that the records are due for disposal. The FRC will not destroy GSA records until the NA Form 13001 is returned with a written concurrence. If the program office does not certify that the records identified on the NA Form 13001 are still needed for business or litigation purposes within 90 days, the CO and Regional Records Officers will sign and return them to the FRC and the records will be destroyed.

d. Emergency or accidental disposal of records.

(1) Emergency disposal. If records are a menace to human health, life, or property, notify the GSA Records Officer. Identify the records, their location, quantity, inclusive dates, and the type of menace. If the GSA Records Officer agrees, dispose of them immediately. Prompt destruction is especially recommended for deteriorated film on a nitrocellulose base. The following disposal procedures are to be followed for this type of film:

- (a) Regularly examine the film for indications of deterioration, such as softness, a strong odor, bubbles, or evidence of breakdown to a powder.
- (b) Remove deteriorated nitrocellulose film from inhabited buildings immediately.
- (c) Salvage the silver content only if this can be done safely by an approved, qualified agent.
- (d) If salvage is not justified, burn the film in an area and manner approved by fire authorities, usually one reel at a time. Do not burn more than 25 pounds of film at one time, as it may explode with great force.

(2) Accidental disposal. In case of accidental loss or destruction of records by fire or other cause, take the following actions:

(a) In Central Office, employees must promptly notify the SSO records officer. In regional offices, employees must promptly notify their records officer. Records officers in turn notify the GSA Records Officer.

(b) Permanent records lost or destroyed must be reconstructed, if possible, from other sources. If reconstructing permanent records is impossible, or reconstruction is incomplete, the missing records must be identified on the records shipment list (SF 135, Records Transmittal and Receipt) when transferring other records covering the same period to a Federal records center.

24. Disposition of records due to transferred functions or reorganization.

a. Functions transferred to or from GSA. When records are to be transferred to or from GSA as a result of a transfer of functions, SSO records officers must send to the GSA Records Officer a request to transfer either by letter or SF 135, Records Transmittal and Receipt. Include a copy of each concurrence or nonconcurrence by agency officials. Include the following information:

- (1) A description of the records and the volume (in cubic feet);
- (2) Any restrictions on using the records;
- (3) The number of persons maintaining the records, if any;
- (4) The current and proposed physical and organizational locations of the records;
- (5) A statement telling why transferring the records is in the interest of the Government; and
- (6) A justification for transferring records more than 5 years old.

b. Disposition of records due to reorganization.

(1) Redesignation or reorganization. When a reorganization changes a function or mission, records are cut off on the date of the change, maintained by the successor office, and disposed of under the standards in this handbook. If no change of mission or function occurs, records are disposed of under standard procedures.

(2) Discontinuance. When an office discontinues functions, it transfers records eligible for retirement to a Federal records center. If records are not eligible for retirement or destruction, send a letter listing the records to the SSO records officer, who will evaluate them and recommend appropriate action.

25. Procedures for retiring records to Federal records centers. FRC's will not accept records for storage if they are authorized for immediate disposal. At least one year of the scheduled retention period must remain. Send records to FRC's using Standard Form 135, Records Transmittal and Receipt. Detailed instructions on how to prepare this form may be found on the Records Management Insite pages. Attached to the SF 135 is a shelf list, a detailed listing of the records contained in each box. Prepared on bond paper, a shelf list is mandatory for permanent records retired to an FRC. Although FRC's do not require shelf lists for disposable records, program offices should include them so that retrieval and research of retired records will be easier.

a. Preparation of Standard Form 135. Prepare an original and four copies of Standard Form 135 and three copies of the shelf list. Forward the original and three copies of the SF 135 and two copies of the shelf list (if included) to the SSO records officer. Retain one copy of the SF 135 and the shelf list in a suspense file until the approved copy is returned. Upon receipt of the SF 135, the records officer will:

- (1) Review the SF 135 for completeness, accurate identification of records, proper citation of disposition authorization (including GRS item number or SF 115 disposal citation), retention period and destruction dates;
- (2) Assign an accession number(s) to the shipment (Central Office and National Capital Region (NCR) only);
- (3) Authorize, sign, and send the original and two copies of the SF 135 to the appropriate Federal records center;
- (4) Retain a suspense copy of the SF 135 and the shelf list;
- (5) Forward one copy of the SF 135 returned by the FRC to the records custodian of the office retiring the records. The records custodian must place one copy of the SF 135 and shelf list in the first box of each accession. The records are now ready for shipment; consult the records officer to determine the best

method of shipment.

(6) When it receives the records, the Federal records center will return a receipted copy of the SF 135 to the SSO records officer that will include the assigned location. In Central Office and NCR, the records officer files the receipted copy of the SF 135 and informs the records custodian of the location number. In the regions, the records officer forwards the receipted copy of the SF 135 to the appropriate records liaison officer. NOTE: Regional FRC's have published regional bulletins supplementing these instructions for retiring records to FRC's. Local procedures should be followed when retiring records.

b. Packing and shipping unclassified records. Obtain standard records center boxes through normal supply channels. Each box holds 1 cubic foot of records. The contents of one letter-size file drawer will fill one and one-half boxes. The contents of one legal-size file drawer will fill two boxes. Contact the records officer to obtain boxes for odd-size records, such as maps or ledgers.

(1) Boxing and labeling files. The Records Management pages provide instruction on correct boxing and labeling. Place files in the boxes in their original filing order. Put one copy of the SF 135 and attached shelf list in the first box of each accession. Using dark black letters at least one and one-half inches high, print the following information on the front (narrow, unstapled) end of the box:

- (a) The accession number in the upper left corner; and
- (b) The box number in the upper right corner showing its relationship to the other boxes in the accession (e.g., 1/3, 2/3, 3/3).

(2) Use of staging areas. Use nonoffice space as a staging area for storing records that will be retired to an FRC within 90 calendar days. Obtain approval to use these areas from the records officer.

c. Packing and shipping classified records. Procedures for packing and shipping classified records are similar to those for unclassified records. However, receipt of classified records by records center personnel must be documented on the SF 135 that is retained by the office releasing the records. Follow the requirements of the HB, Information Security, ch. 7 (ADM P 1025.2C) when preparing classified records for shipment to a Federal records center.

d. Reference requests. To recall records from an FRC, complete Optional Form 11, Reference Request -- Federal Records Centers. This form is available on the Records Management Insite pages. In the Central Office, forward the request through the SSO records officer. For emergency requests, at least 24 hours notice must be given to the WNR. In the regions, follow the procedures established by the records officer and regional FRC's.

26. Transfer of records to the National Archives. Records of permanent historical or archival value may be transferred to the National Archives. To transfer records to the National Archives, regional archives branches or Presidential libraries, complete Standard Form 258, Request to Transfer, Approval, and Receipt of Records to National Archives of the United States. Forward the request to the SSO records officer for review and approval. The records officer will request approval of the Accession Control Staff (NW) or the regional archives branch, as appropriate, if the records are described in this handbook as permanent. If the records are not described as permanent, the GSA Records Officer will coordinate the request with the Records Appraisal and Disposition Division (NIR).

27. Disposition of records maintained for GAO audit. The General Accounting Office (GAO) requires that all accountable officers' records be made available for GAO audit. Accountable officers' records and site audit records are not GAO records. They are GSA records maintained for GAO audit purposes.

a. Identification of accountable officers' accounts. Accountable officers' records encompass practically all documents supporting disbursements or collection of money. Agency forms used in place of standard-form vouchers or schedules, documents supporting vouchers and/or schedules, and machine-readable versions of accountable officers' accounts are included in this definition. Accountable officers' accounts accumulated by GSA for site audit by GAO consist of the following specific documents or their equivalent:

- (1) Statements of transactions and accountability;
- (2) Collection schedules and vouchers;
- (3) Disbursement schedules and vouchers; and
- (4) All other schedules and vouchers or documents used as schedules or vouchers. Fiscal records not mentioned above, such as memorandum copies of accountable officers' account documents, are agency records and disposable under this handbook.

b. Transfer of accountable officers' accounts to FRC's.

(1) Accountable officers' accounts may be transferred to FRC's for storage. Any audited accounts and all unaudited accounts more than 1 full fiscal year old may be transferred to FRC's by agencies without special permission from GAO. However, authority to transfer accountable officers' accounts that are less than 1 year old and have not been audited should be obtained from GAO.

(2) When transferring fiscal records of any kind to an FRC, be careful not to mix accountable officers' account records with other agency records. Separate SF 135's must be prepared for accountable officers' account records and other agency records being transferred. For accountable officers' account records, the GSA record group number(s) is used on the SF 135.

c. Disposal of certain fiscal records.

(1) When the disposal of some fiscal records depends on the completion of GAO audits of related accountable officers' accounts and they are not required by a GSA Records Schedule or the General Records Schedule (GRS) to be retained for a longer period, destroy the original documents when 3 years old or when audited by GAO, whichever is earlier.

(2) Records that are otherwise scheduled for destruction because their prescribed retention period has expired may not be destroyed if they are the subject of an ongoing GAO audit.

(3) Retention periods for the following types of records must be approved by GAO if an office wants to decrease the retention periods outlined in this handbook and the GRS:

- (a) Payroll and pay administration;
- (b) Procurement and supply;
- (c) Property disposal;
- (d) Budget preparation, presentation, and apportionment;
- (e) Accountable officers' accounts;

- (f) Expenditure accounting;
- (g) Stores, plant, and cost accounting;
- (h) Travel and transportation;
- (i) Motor vehicle maintenance and operation;
- (j) Program records that are to be kept for less than 3 years; and
- (k) Records relating to claims or demands by or against the Federal Government.

d. GSA responsibilities relating to site audit records. Responsibility for the care and protection of site audit records created by GSA lies with GSA, not GAO. GSA responsibilities fall into two areas: protection and unlawful disposal.

- (1) Maintain the records in suitable, easily accessible filing equipment. The filing and maintenance of the documents should be in accordance with Executive Order 12356 (50 U.S.C. 401) and the Information Security Oversight Office, Directive No. 1, National Security Information (32 CFR 2001).
- (2) While accountable officers' accounts are in GSA custody, program officials must ensure the documents are not prematurely destroyed. If the records are destroyed or are accidentally mutilated or marred so that their record content disappears, notify the records officer.
- (3) Records covered by a GSA Records Schedule or the GRS may not be destroyed until the expiration of the prescribed schedule or the completion of any audit, investigation, or review by GAO involving the records, whichever is later.

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CHAPTER 4. MAINTENANCE AND DISPOSITION OF ELECTRONIC RECORDS

1. General. This chapter provides guidance for GSA associates on maintaining electronic records needed for business. The records may be internally created or received from exterior sources. They may be either in native electronic format or be electronic copies made from hard copy materials. GSA associates are encouraged to consider electronic recordkeeping as a business enhancer. The information that follows only applies to any electronic recordkeeping an organization chooses to implement.
2. Definitions.
  - a. Electronic records. Discrete electronic objects such as word processing documents, spreadsheets, email messages, images and the like.
  - b. Electronic data systems. Systems that contain multiple iterations of similar data records, tables, or objects, to which universal rules apply.
  - c. Electronic document management systems. Systems that contain discrete, dissimilarly formatted electronic objects and which maintains metadata about each object, including interrelationships between the objects based on categorization, and which has rules governing access to objects.
  - d. Electronic record keeping systems. Systems which have many of the same functions as electronic document management systems but which also rules governing the retention of the objects.
  - e. Records disposition. The orderly disposal of records in accordance with the retention periods in the GSA File Plan.
3. General considerations for electronic recordkeeping.
  - a. The official file copy of electronic records should be kept on organizationally shared network drives. Working copies may be kept on local hard drives, personal network drives and the like. Because retrieval from local and personal network is dependent on the availability of a single individual or machine, either of which may fail, only copies on organizational drives can reliably be regarded as "official" records.
  - b. To the extent possible, shared organizational drives should be formatted to reflect the filing categories outlined in OAD 1820.2a, chapter 5, records disposal. These categories are not those outlined in [cite], which gives examples of subject file keeping (e.g., PRO, PER, etc subjects). Where such formatting is not feasible, some other means of associating individual documents and marking them for eventual disposition should be made, such as a crosswalk to the records disposal schedule or other tagging schema.
    - (1) The filing categories above should be populated according to content and matter (e.g., contract records should be filed in a folder labeled 05C025) or equivalent (e.g. FY03 Contracts), and then in a subfolder labeled with the contract number).

(2) At the close of each year (FY or CY), closed matters (e.g., contracts, inventory lists, etc.) should be moved to a top level FY folder or taken offline to removable media, which should then be made read-only.

c. In some cases documents may contain information whose dissemination is limited to those with the need to know. In this situation such documents should be protected by limiting access, either by placing on removable media, standalone systems, or in password-protected systems.

4. Data formats for electronic recordkeeping. GSA-wide infrastructure currently supports Microsoft Office data formats, Lotus Notes, and various open format data standards. The expected longevity of the data formats follows, based on the retention period of the record. Please note that this guidance only addresses data formats, not physical media such as CD-ROMs. E-mail messages and their attachments and audio and video formats are evaluated separately as formats, paragraphs 5 and 6 below. Please note that only rarely is the retention period based on the creation date of the record; most often it is based on some action affecting the status of the record (e.g., obsolescence, supersession, or the occurrence of an event such as termination of contract or completion of project).

a. Retention period zero to three years. Any data format currently in use may be selected; however the use proprietary formats which are not supported by external viewers and/or require proprietary software to read (such as those used by digital camera manufacturers and presentation packages such as Powerpoint) should be evaluated for their ability to export data to non-native formats or the continued availability of the software for use as a viewer.

b. Retention period three to seven years. All major office suite data formats. Non-proprietary digital image formats, such as Tagged Image File Format (TIFF), in 'II' format, 2 versions 4.0 (April 1987), 5.0 (October 1988), and 6.0 (June 1992); Graphics Interchange Format (GIF), versions 87a (June 1987), and 89a (July 1990); Basic Image Interchange Format (BIFF), International Standards Organization (ISO) Standard 12087-5, Part 5 (December 1998). Portable Network Graphics (PNG), version 1.0 (October 1996).

c. Retention period seven years and beyond. All major office suite data formats, image formats noted in "b" above. All other records in data format besides these should be evaluated to determine their ability to output their contents to a non-proprietary format such as Rich Text Format, Standardized General Markup Language, or eXtensible Markup Language (XML), or Portable Document Format (PDF), versions 1.0 through 1.4. (when using PDF, care should be taken to embed rather than call fonts from external sources if the records are to be placed on removable media).

5. E-mail messages and attachments. E-mail mail servers and clients are by their nature proprietary. Special effort must be taken to document the E-mail environment in order to preserve e-mail messages. GSA's Notes mail server is configured to delete unarchived messages sixty days after creation and there is currently no plan to institute selected institutional archiving of messages.

a. If an office chooses to preserve e-mail records as a record, it is advisable to use the filing schema specified in paragraph 3 above as a repository for e-mail messages needed for continued business purposes and apply the same categorization standards.

b. The message should be filed by exporting the file to the above mentioned organizationally shared network drive. To do so select the file from the Inbox view, choose File and Export (Export selected message), selecting Structured Text as the output format and giving the file a name. This will preserve sender/recipient information but not any attachments. Attachments should be saved separately.

6. Audio and Video data formats. Many competing digital audio and video formats are available. Most are proprietary, such as Real Audio (file name extension .ra\*), QuickTime (.qt\*), and Windows Media (.wav, .WMA, etc). These formats are viewer dependent; while some proprietary formats are readable by competing viewers, translation is not reliable.

a. The Moving Pictures Experts Group (.mp\*) is an open standard and should be the format of choice for preserving record audio and video data.

(1) MPEG-1 is the preferred standard for video which has not been professionally edited video and audio files.

(2) MPEG-2 is the preferred standard for professionally edited video.

(3) MPEG-4 is the preferred standard for multimedia

b. When converting audio or video data from legacy (analog) or proprietary formats, use the minimum compression ratio consistent with the desired results.

7. General considerations and permissions for implementing electronic recordkeeping.

a. Any paper file which duplicates the contents, in whole or in part, of another existing file (e.g., "day" files, chron files, reading files) should be replaced by an electronic file if no extra expense such as scanning is incurred, unless the extra expense is otherwise justifiable.

b. Any file which is eligible for disposal within three years of the cutoff of the file (e.g., end of FY) and which does not need to be preserved in paper to meet physical or legal requirements is strongly recommended for conversion to electronic format.

c. Any file which is eligible for disposal within seven years of the cutoff of the file and which does not need to be preserved in paper to meet physical or legal requirements is strongly recommended for evaluation for conversion to electronic format.

d. Any file not covered under "a" through "c" above, but for which there exists a perceived need for conversion to electronic format should be referred to the GSA Records Officer for analysis of appropriateness of conversion and technical requirements for such conversion.

8. Updates. Updates to this guidance will be issued periodically. Clarifications and requests for expansion of data formats should be addressed to the GSA Records Officer, Marc Wolfe (202)-501-2514, [marc.wolfe@gsa.gov](mailto:marc.wolfe@gsa.gov)(preferred).

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## CHAPTER 5. VITAL RECORDS

1. General. In the event of any emergency causing a disruption of regular business, GSA must be able to maintain emergency operations and to resume full operations as soon as possible. The scale of possible interruptions addressed in this chapter ranges from small localized events such as water damage to records caused by a burst pipe up to and including a major disaster affecting one or more United States government facilities. Disasters include both natural and man-made events. Since GSA has a role in assisting other Federal agencies in the event of an emergency, including supporting their disaster recovery efforts, identifying and protecting GSA's vital records is crucial to supporting the continuity of operations of not only GSA, but the United States Government.

2. Definitions.

a. Vital records. All records are necessary to a greater or lesser degree. In the context of this chapter, vital records are the subset of records necessary to maintain the continuity of GSA operations during an emergency, to enable operations of critical functions within the timeframe laid out in Head of Services and Staff Offices (HSSO) Continuity of Operations Plans (COOP), and eventually recover full operational capacity. There are two basic categories of vital records: emergency operating records and legal and financial records.

(1) Emergency operating records. Emergency operating records fall into two categories, those necessary to support critical programs to continue their functions, and those necessary for the critical programs to continue their function, and those necessary to complete the recovery of full functionality of the agency. In the context of this chapter the former are called operational and functional records.

(a) Operational records. Records that enable first responders to assess damage, evaluate options, activate alternate sites as needed, and contact and direct GSA associates affected by the event as to their duties. Examples include cascade lists, emergency operating plans, and similar documents.

(b) Functional records. Primarily those records that enable GSA associates charged with resuming critical business functions to operate at the level of functionality and in the timeframe specified in the COOP. Secondly those records that enable GSA associates charged with sub-critical but otherwise required programs to resume operations after the effects of an event are remedied. Examples of the first include records documenting business relationships, lines of credit, authority to perform work or provide goods and services; examples of the second include bodies of records preserving institutional memory, such as records documenting actions concluded prior to the event.

(2) Legal and financial records. Records required for the preservation of the rights and interests of individual citizens and the Government. These records include proof of ownership, financial transactions, and open legal proceedings and decisions. Legal and financial records would not generally be needed during an emergency but would be crucial in returning GSA to full normal operations.

3. Responsibilities.

a. GSA Records Officer. The GSA Records Officer develops and issues GSA-wide policy and guidance covering vital records and works with associates performing records liaison activities.

b. Services and Staff Office Records Officers (SSOROs). SSOROs implement the Vital Records Program within their SSO. Responsibilities include:

- (1) Reviewing individual Inventories of Emergency Operating Records for each organization to ensure that they are complete;
- (2) Assisting program officials to physically identify, label, and store vital records; and
- (3) Reviewing and evaluating the recordkeeping and disposal practices at emergency operating facilities.

c. Program managers and business line leaders. Program managers and business line leaders ensure that for each Phase 2 activity identified there is a GSA associate responsible for developing a list of vital records for that activity. The associate functions as the Vital Records Coordinator for the specific activity.

d. Vital Records Coordinator (VRC). The VRC works with senior program staff to identify and document, on a GSA Form 1656, Inventory of Emergency Operating Records or equivalent, all records needed to resume the activity. The VRC also develops the strategies necessary to make those records available to associates performing the activity during Phase 2.

e. System and application owners and network managers. System and application owners and network managers should strive for a return-to-service period of not more than 12 hours, considered the "gold standard", if the functionality is required by associates performing Phase 2 activities. For time-critical systems needed by first responders, the time should be considerably less, or redundant or mirrored systems should be created. If a system or network containing vital records can not reliably be restored to functionality within the time period required by the COOP the affected program should be so advised.

f. GSA Emergency Coordinator. The GSA Emergency Coordinator develops and implements GSA-wide policy and guidance regarding the GSA COOP program, directs the development of COOP plans, and serves as the primary point of contact with Federal and volunteer agencies during emergency planning and operational activities.

g. Service and Staff Office Emergency Coordinators (SSOECs). SSOECs coordinate the development of COOP plans for the service or staff office and the implementation of these plans as necessary during an emergency.

h. Regional Emergency Coordinators (RECs). REC's are responsible for coordinating implementation of GSA and service and staff office COOP plans within their regions.

i. Regional Records Officers (RROs). RROs are responsible for implementing the Vital Records Program within their region. Responsibilities include:

- (1) Ensuring that a regional Inventory of Emergency Operating Records is developed and is accurate and current;
- (2) Assisting program officials and REC's to identify, label, and prepare records for inclusion in fly-away kits or shipment to emergency operating centers (EOC), as appropriate; and
- (3) Ensuring that rights and interests records maintained in the region are identified on the Records Maintenance Plan (GSA Form 2039) in the office responsible for their custody and that such records are protected from damage or destruction (see par. 6).

4. Inventory of Emergency Operating Records. GSA Form 1656, Inventory of Emergency Operating Records, is an integral part of a SSO COOP plan. The records selected for this inventory must be those necessary to support the emergency operations outlined in the plan. For this reason, the program officials and emergency coordinators responsible for developing the plans should designate the records that are included in the inventory.

a. Identifying emergency operating records. Select the fewest possible records for pre-location at an EOF or the EDD, or for transporting to an EOC, or inclusion in a fly-away kit. Prelocating unneeded records could cause delays in locating needed records in an emergency.

b. Completing the inventory. Each August, the SSORO and RROs will issue a call to CO service and staff office and RECs for a new or updated inventory of emergency operating records. Detailed instructions for completing the inventory are printed on the back of the form.

- (1) SSO and regional emergency coordinators must coordinate the inventory with program officials responsible for developing segments of emergency preparedness plans.
- (2) Responsible program officials must complete an inventory form describing records necessary to support plans. Code references to classified material by using the first and last letter of each word in its title, so that the inventory itself remains unclassified.
- (3) Emergency coordinators must review the completed inventory to ensure that the records are appropriate and needed at the site indicated or included in fly-away kits. The coordinators must then approve the completed inventory and submit it to the GSA records officer (Central Office) or regional records officer, or partner region.
- (4) SSO records officers must certify that the items in the completed inventory are correctly identified and that recordkeeping and disposal instructions are realistic. Each records officer will retain one copy of the inventory in a central inventory file and will return the original to the emergency coordinator.
- (5) The emergency coordinator will retain the original inventory with the appropriate COOP plan. The coordinator will make one copy for the responsible program official and one copy to transmit to the EOC, EOF, or ECC, as appropriate.
5. Preparing and distributing emergency operating records. Prepare and distribute records identified on GSA Form 1656 to EOF's, the EOC, or fly-away kits according to the schedule described in column 5 of that form.

a. Preparing emergency operating records.

(1) To the degree possible, emergency operating copies of vital records should be stored in their native format. Electronic records in a data system, such as PEGASYS, lose their functionality outside of the system. Such systems should have their own return-to-service plan. In certain cases where only a subset of records are required, such as cascade lists, it may be appropriate to export them to paper or portable electronic media. If electronic records such as CAD drawings require special equipment for their use (such as printing plotters), which are cost-prohibitive to duplicate at an alternate site, printing and pre-locating may be advisable.

(2) To prepare paper records or records on removable media that are not part of a fly-away kit:

- (a) Package each item separately.
- (b) Label each package with GSA Form 1656-B, Identification Label-Prepositioned Records.
- (c) Arrange the packages in the order they appear on the inventory.
- (d) Box the packages in shipping cartons or envelopes, as appropriate, and address according to the instructions provided by the emergency coordinator.

b. Distributing emergency operating records. Distribute emergency operating records to EOF's or the ECC or store them in fly-away kits according to a schedule that ensures that the records at the EOC, EOF, or ECC are current. (See instruction for column 5, GSA Form 1656.) Records may be distributed as follows:

(1) Automatic distribution.

(a) Documents such as GSA directives that have standard distribution codes will be distributed automatically to both Central Office EOF's and the ECC. If a directive or other printed document has a special distribution code rather than standard codes, the program official must notify his or her clearance officer to ensure automatic distribution to an EOF or ECC. In particular, any document that must be included in the Code of Emergency Federal Regulations (CEFR) must be distributed in this way.

(b) GSA forms will be automatically distributed to relocation sites if the originator directs this distribution on the GSA Form Request for Forms Management Services when the form is created or revised. Alternatively, offices creating or using GSA forms may request that copies be placed in the Insite document library.

(2) Regular schedule. Documents or groups of documents may be distributed to an EOF annually, semiannually, quarterly, monthly or weekly, as appropriate.

(3) On completion, issuance, or receipt. Documents may be sent to an EOF or the ECC as they are completed, issued, or received.

c. Maintaining emergency operating records. Services available at alternate storage sites vary according to location and staff available.

(1) Staffed sites. At staffed sites, record custodians file and maintain records according to the instructions contained on the inventory.

(a) Unless they have specific instructions to the contrary, custodians file packages of records, replacing prior versions, rather than interfiling documents. The custodian will dispose of outdated packages and documents as instructed on the inventory.

(b) Custodians return packages that are improperly labeled or that do not appear on the inventory. If unlisted records must be located at the site, the responsible official must provide special instructions for the custodian and must ensure that the inventory is revised within 90 working days.

(2) Unstaffed sites. At unstaffed sites, responsible program officials must file, maintain and dispose of emergency operating records. At such sites:

- (a) Arrange records so that program officials can use them easily during an emergency or during a test of emergency procedures.
- (b) Place record packages in drawers in the order they appear on the inventory.
- (c) Arrange records so that it is easy to replace obsolete material.

(d) Clearly identify and separate records according to service and staff office and major office within a service or staff office. Clearly identify records that are intended for the use of single officials and file such records so that they are easily accessible to these officials.

- (e) Clearly label all file drawers.
- (f) Where possible, replace outdated packages of records with current packages, rather than interfiling individual pages.
- (g) Dispose of outdated packages and documents as instructed on the inventory.

(3) Maintenance of fly-away kits. Any regional program official responsible for implementing an emergency preparedness plan or a portion of a plan must ensure that records to support that plan are included in a fly-away kit. Program officials responsible for maintaining fly-away kits must review them at regular intervals to ensure that the contents are complete and current. Fly-away kits are defined as packages of records, information, equipment and other items or materials pertinent to an emergency operation that can be carried by GSA associates charged with duties under Phase 2 of the COOP. Fly-away kits may consist of either pre-positioned records and the equipment required to access them or carried on the person. Laptops, PDAs, wireless communication devices, portable media such as CD-ROMs or USB "keychain" devices, and printed materials may be used as appropriate or convenient.

(4) Information security. All information contained in any collection of emergency records, including those in fly-away kits, will be handled and protected in accordance with GSA Order, Information Security Policy (CIO P 2100.1C).

(5) Program evaluation visits. Emergency coordinators, responsible program personnel, and CO and regional records staff must visit EOF's or the ECC regularly to evaluate records maintenance practices and procedures at the facilities.

#### 6. Rights and interests records.

a. Identifying rights and interests records. Rights and interests records must be identified as such in the Description of Records portion of the record schedules in this handbook and in the Records Maintenance Plan (GSA Form 2029) of the office that is the custodian of the records. Apply a two-part test to identify rights and interests records:

(1) Records that are essential for preserving the legal rights and interests of citizens or the Government; and

(2) Records for which the Federal Government is the statutory office of record; e.g., citizenship records, Social Security and Federal retirement benefit records, Federal payroll and leave records, etc. Records that can be replaced or restored after an emergency through means such as affidavits are not vital records in this category.

b. Preserving rights and interests records. Rights and interests records are not generally needed during emergency operations and therefore should not be maintained at EOFs or EOFs. However, copies should be available in case the originals are damaged or destroyed. To ensure that copies are available, program personnel may:

(1) Identify copies of records that are ordinarily maintained at other locations, as in the regions; or

(2) Create extra copies of records during the normal course of business and transfer these to alternate storage, such as a Federal Records Center (FRC). Program officials who wish to use FRCs as alternate storage for rights and interests records should notify the SSO or RRO.

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