



## STANDARD OPERATING PROCEDURE

Number	Date	Organization
	10/10/2013	THD REPP

### Records Management Process

#### I. Purpose

This standard operating procedure (SOP) provides policy, procedures, guidance and responsibilities for managing and maintaining an efficient and effective records management program within DHS/FEMA's Technological Hazards Division (THD). This SOP will standardize the manner in which THD manages official paper and electronic records throughout their lifecycle. The Radiological Emergency Preparedness Program (REPP), Chemical Stockpile Emergency Preparedness Program (CSEPP), Business Operations and Professional Services (PS) branches that comprise THD shall adhere and comply with these procedures and guidelines. Per 44 United States Code (U.S.C) Chapter 31 §3102 Records Management by Federal agencies, FEMA is to establish and maintain an active and continuing program within its components in headquarters, regions, and field establishments for the economical and efficient management of records of the agency.

THD, as a component, shall establish and maintain a compliant records management program in helping the agency successfully accomplish its mission, preserving official records in accordance with applicable statutory and regulatory requirements, and promoting information sharing between THD and stakeholders. THD's Records Management Program is implemented and maintained by the division's Records Liaison Officer (RLO), who has the authority to conduct an efficient and effective records management program, with the responsibility of promoting DHS and FEMA's records management policies and procedures within the division. THD branches shall designate records custodians as needed, as their point of contact to work and coordinate with the RLO to ensure that THD records are properly maintained and managed throughout their lifecycle.

#### II. Supersession

This SOP supersedes any other Records Management Process SOPs or standard guidelines. This document serves as the current and active Records Management Process SOP.

*Note: This version of this SOP has been revised for formatting and grammar. Processes and requirements will be updated and validated in a subsequent draft once the RLO completes her review and update of the records management process and requirements*

### **III. Authorities and References**

#### **1) Title 5 U.S.C. Chapter 5, Subchapter II - Administrative Procedure**

- I. 5 USC § 552 and 5 USC § 552a provide guidance for public information, agency rules, opinions, orders, records, and records maintained on individuals.

#### **2) The Federal Records Act of 1950 (as amended) (44 U.S.C. 3101-3107)**

- I. The Federal Records Act of 1950, as amended, establishes the framework for records management programs in Federal Agencies. As the primary agency for records management oversight, the National Archives and Records Administration (NARA) is responsible for assisting Federal agencies in maintaining adequate and proper documentation of policies and transactions of the

#### **3) Title 40 U.S.C. Subtitle III- Information Technology Management (Clinger-Cohen Act of 1996, also known as the Information Technology Management Reform Act of 1996)**

- I. The Clinger–Cohen Act, formerly the Information Technology Management Reform Act of 1996 (ITMRA), is a 1996 United States federal law, designed to improve the way the federal government acquires, uses and disposes information technology (IT). The Clinger–Cohen Act supplements the information resources management policies by establishing a comprehensive approach for executive agencies to improve the acquisition and management of their information resources.

#### **4) 44 U.S.C. Chapter 21 – National Archives and Records Administration**

- I. The purposes of this Act are to provide for the creation of the President John F. Kennedy Assassination Records Collection at the National Archives and Records Administration; and to require the expeditious public transmission to the Archivist and public disclosure of such records.

#### **5) 44 U.S.C. Chapter 29- Records Management by the Archivist of the United States and by the Administrator of General Services**

- I. It is the purpose of this chapter, and chapters 21, 31, and 33 of this title, to require the establishment of standards and procedures to assure efficient and effective records management.

#### **6) DHS Records Management Directive, Directive Number 141-01, Revision 00**

- I. Consistent with Title 5, United States Code (reference (a), this Directive provides policy and responsibilities for Department of Homeland Security (DHS) implementation of arms control agreements of the United States Government and compliance with them.

#### **7) Records Management Files Maintenance and Records Disposition FEMA Manual 181-1-1b**

- I. This manual provides guidance for preserving records of the Federal Emergency Management Agency (FEMA), whether in textual or electronic form. This manual also provides guidance on ways to best establish and maintain uniform, economical, and efficient practices for records maintenance and disposition. It provides detailed procedures not only for planning, arranging, and maintaining files, but also for the disposition of records either by destruction or preservation for future use by historians.

#### **8) Electronic Mail Recordkeeping FEMA Instruction 5400.4**

- I. This instruction establishes and disseminates policy and guidance on the management and retention of E-mail messages that fit the description of official records.

#### **IV. Responsible Offices**

This grid will be completed at a later date with the full process revision.

#### **V. Materials to Managed Under this Guidance**

##### **1) Federal Records**

Federal records include all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of the data in them (44 U.S.C. 3301). At DHS/FEMA, a document is a record if a FEMA office created it, acted on it, received it for action, is the custodian of it and if it is needed to document FEMA activities.

Records are defined as documents that have been approved for official use. Draft documents and electronic correspondence are considered official records when they are in active use in a government decision-making process. For example, minutes that are taken at meetings with significant decisions and commitments reached orally, together with a copy of the agenda and all documents considered during or resulting from such meetings, will become an official record. THD must create, use, safeguard, preserve, and dispose of records, regardless of media type and appropriately release records in a timely manner pursuant to the Freedom of Information Act (FOIA). An organized records management infrastructure is vital, allowing us as a Division to demonstrate our commitment in documenting our service to the nation.

##### **2) Non-record Materials**

Non-record materials are Government-owned informational documents excluded from the definition of “records” or not meeting the requirements of that definition. (see 36 C.F.R. 1222.34(b)). Non-record materials may be disposed of at any time after its purpose has been served. Non-record material will not be interfiled with temporary or permanent record material. The following are specifically excluded from status as records by statute (see 44 U.S.C. 3301):

- I. Library and museum material (but only if such material is made or acquired and preserved solely for reference or exhibition purposes);
- II. Extra copies of documents (but only if the sole reason such copies are preserved is for convenience of reference);
- III. Stocks of publications and of processed documents. (Each agency shall create and maintain serial or record sets of its publications and processed documents, as evidence of agency activities and for the information they contain, including annual reports, brochures, pamphlets, books, handbooks, posters and maps.)

### 3) **Personal Papers**

Personal Papers are materials not used to conduct FEMA business. Personal papers are excluded from the definition of Federal records and are not owned by the Government. Examples of personal papers include:

- I. Documents created before entering FEMA,
- II. Date book containing personal entries (i.e. private appointments),
- III. Copies of personnel actions, and
- IV. Information from professional meetings or associations to which staff members belong.

If information about private matters and agency business appears in the same document, the document shall be copied at the time of receipt, with the personal information deleted, and treated as a Federal record.

Materials labeled “personal,” “confidential,” or “private,” or similarly designated, and used in the transaction of public business, are Federal records subject to the provisions of pertinent laws and regulations. If personal papers are maintained in THD, they shall be clearly designated as such and filed or otherwise maintained separately from the official records of the office. In determining whether personal papers may be created and/or maintained in THD, among other things, THD staff members must comply with DHS policies on Personal Use of Office Equipment,” and “Use of Electronic Mail Systems.” THD personnel may not remove any Federal records from THD custody while removing their personal papers and designated non-record materials.

### 4) **Working Files and Similar Materials**

Working files, such as preliminary drafts and rough notes, and other similar materials shall be considered Federal records if they:

- I. Were circulated or made available to employees, other than the creator, for official purposes such as approval, comment, action, recommendation, follow-up, or to communicate with agency staff about agency business or if they,
- II. Contain unique information, such as substantive annotations or comments that adds to a proper understanding of the agency’s formulation and execution of basic policies, decisions, actions, or responsibilities.

### 5) **Records Status of Copies**

A copy of a document, whether paper, electronic, email, or otherwise, used in the business of a DHS office is a record for that office, even if another copy is maintained elsewhere in the DHS for other business purposes.

### 6) **E-mail Records**

An email record is a document created by or received via an electronic mail system which meets the definition of a Federal record as specified in 44 U.S.C. 3301. As a THD employee, it is up to you to make the determination that if electronic mail (email) is a Federal record. The sender and the person who receives electronic mail independently determine whether or not the message and its attachments meet the definition of a Federal record for their program branches. Recordkeeping systems that include E-mail messages must provide for the grouping of related records into classification according to the nature of the business purposes the records serve. They must also permit easy and timely retrieval of both individual records and

## FEMA THD REPP Records Management Process

files or other grouping of related records. E-mail records must be retained in a usable format for their required retention period as specified by a NARA-approved records schedule and be accessible by individuals who have a business need for information in the system.

Electronic mail determined to be Federal records falls into three categories: permanent records, temporary records, and transitory records. The following are examples of electronic mail that constitute Federal records:

- I. Electronic mail that contains substantive information that is necessary to adequately and properly document the activities and functions of DHS/FEMA.
- II. Electronic mail that provides key substantive comments on a draft action memorandum if the electronic mail message adds to a proper understanding of the formulation or execution of DHS/FEMA action;
- III. Electronic mail that provides documentation of significant DHS/FEMA decisions and commitments reached orally;
- IV. Electronic mail that conveys information of value on important DHS/FEMA activities if the electronic mail message adds to a proper understanding of DHS operations and responsibilities;
- V. Electronic mail that documents the formulation and execution of basic policies and decisions;
- VI. Electronic mail that documents important meetings;
- VII. Electronic mail that denotes actions taken by DHS/FEMA officials and their successors;
- VIII. Electronic mail that makes possible a proper scrutiny by the Congress or other duly authorized agencies of the Government;
- IX. Electronic mail that protects the financial, legal, and other rights of DHS/FEMA and of person directly affected by the Department's actions.

### 7) Records Requested under the Freedom of Information Act (FOIA)

The Freedom of Information Act (FOIA) is a Federal statute that provides the public with the right to request access to records in the possession of Federal agencies in the Executive Branch. FOIA does not grant an absolute right to examine government documents; FOIA establishes the right to request records and to receive a response to the request. If a record cannot be released, the requestor is entitled to be told the reason for the denial. The requester also has a right to appeal the denial and, if necessary, to challenge it in court. FOIA establishes a presumption that records are accessible to the people, except for those records protected from disclosure by any of the nine exemptions contained in law or by one of three special law enforcement record exclusions. The nine exemptions are:

Exceptions	
<b>Exemption 1</b>	Protects information that is properly classified in the interest of national security pursuant to Executive Order 12958.
<b>Exemption 2</b>	Protects records related solely to the internal personnel rules and practices of an agency.
<b>Exemption 3</b>	Protects information exempted from release by statute. Example of information the Department of Homeland Security may withhold using 3: Information protected by the

## FEMA THD REPP Records Management Process

	Critical Infrastructure Act of 2002; e.g.: information pertaining to actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, state, or local law, harms interstate commerce of the United States, or threatens public health or safety.
<b>Exemption 4</b>	Protects trade secrets and commercial or financial information which could harm the competitive posture or business interests of a company. Example of information the Department of Homeland Security may withhold using 4: Commercially valuable formulas or other proprietary information not customarily released to the public entity from whom the information is obtained.
<b>Exemption 5</b>	Protects the integrity of the deliberative or policy-making processes within the agency by exempting from mandatory disclosure opinion, conclusions, and recommendations included within interagency or intra-agency memoranda or letters. Example of information the Department of Homeland Security may withhold using 5: Draft documents and recommendations or other documents that reflect the personal opinion of the author rather than official agency position.
<b>Exemption 6</b>	Protects information that would constitute a clearly unwarranted invasion of personal privacy of the individuals involved. Example of information the Department of Homeland Security may withhold using 6: Social Security Numbers, home addresses and telephone numbers, certain identifying information regarding Department employees.
<b>Exemption 7</b>	<p>Protects records or information compiled for law enforcement purposes the release of which could reasonably be expected:</p> <ul style="list-style-type: none"> <li>• <b>7(A)</b> To interfere with enforcement proceedings. Example of information the Department of Homeland Security may withhold using: Records pertaining to an open law enforcement investigation.</li> <li>• <b>7(B)</b> Would deprive a person of a right to a fair trial or an impartial adjudication. Example of information the Department of Homeland Security may withhold using: Information that could potentially contaminate a jury pool.</li> <li>• <b>7(C)</b> To constitute an unwarranted invasion of the personal privacy of a third party/parties (in some instances by revealing an investigative interest in them). Example of information the Department of Homeland Security may withhold using: Identifying information of individuals associated with a law enforcement proceeding; i.e. law enforcement officers' names, witness/interviewee identifying information.</li> <li>• <b>7(D)</b> To disclose the identity/identities of confidential sources. Example of information the Department of Homeland Security may withhold using: Identifying information of confidential informants.</li> <li>• <b>7(E)</b> Would disclose techniques and procedures for law enforcement investigations or prosecutions. Example of information the Department of Homeland Security may withhold using: Law enforcement manuals, records pertaining to Watch Lists.</li> <li>• <b>7(F)</b> To endanger the life or physical safety of an individual. Example of information the Department of Homeland Security may withhold using: Identifying information of law enforcement officers.</li> </ul>
<b>Exemption 8</b>	Protects information that is contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions. Example of information the Department of Homeland Security may withhold using: Exemption rarely invoked by Department of Homeland Security.
<b>Exemption 9</b>	Protects geological and geophysical information and data, including maps, concerning wells.

### ***FOIA Response Times***

In general, the FOIA requires an agency to respond to FOIA requests within 20 business days after the office that maintains the responsive records receives the request. The business day response requirement is not necessarily the time frame for releasing responsive documents.

Department of Homeland Security general policy is to process requests by date of receipt at the proper office maintaining the required records on a first-in, first-out basis, except for exceptions outlined in the FOIA and the Department of Homeland Security FOIA implementing regulations. For example, under certain conditions, your request may receive expedited processing if you meet the criteria established in our regulations. However, an expedited request will be processed on a first-in, first-out basis with other expedited requests. Expedited processing of a request may be granted in accordance with Department of Homeland Security FOIA/PA regulations

([http://www.dhs.gov/xlibrary/assets/FOIA\\_FedReg\\_Notice.pdf](http://www.dhs.gov/xlibrary/assets/FOIA_FedReg_Notice.pdf)).

## **8) Personally Identifiable Information**

### ***What you need to know about the Privacy Act***

FEMA is responsible for protecting the privacy of its employees, contractors, and the public we serve. As a FEMA employee you are required to take precautions when collecting, maintaining, distributing, and disposing of PII in executing your job.

### ***Records Containing PII***

PII is any information that permits the identity of an individual to be directly or indirectly inferred, including any information which is linked or linkable to that individual regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. Sensitive PII is personally identifiable information, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.

### ***Loss of PII***

Loss of PII can lead to identity theft, which is costly to the individual and to the Government, resulting in actions being taken against the employee or contractor. Loss of PII can also erode confidence in the Government's ability to protect information. PII must be protected and treated as personal and confidential. Employees and contractors shall not include social security numbers (SSNs) in the subject line or body of an email, and shall not place PII in public folders or websites.

When creating a system of records within FEMA, always consult with the Privacy Office. Hardcopy documents containing PII should be secured (locked up) when not being used. Do not be afraid to confirm whether an employee who asks to see PII has a "Need to Know" or authorized access. FEMA is responsible for protecting the privacy of its employees, contractors, and the public we serve. You are required to take precautions when collecting, maintaining, distributing, and disposing of PII in executing your job. It contains both civil and criminal penalties for non-compliance.

### ***Disposal of PII***

*Mistakes are made in securing PII by:*

- Inadvertently creating a system of records without appropriate privacy documentation;
- Creating a rogue system with PII;
- Unauthorized information sharing;

## FEMA THD REPP Records Management Process

- Browsing or using personal information for any purpose other than to do your job;
- Leaving PII files or documents unattended;
- Not appropriately securing PII files or documents;
- Maintain only accurate, timely, and complete information.

*In properly disposing of PII, do not:*

- Maintain records longer than permitted under records disposal requirements;
- Destroy records before disposal requirements are met;
- Drop information containing PII into regular trash;
- Documents containing PII must be shredded prior to being recycled.

*The best practice is cross cut shredding:*

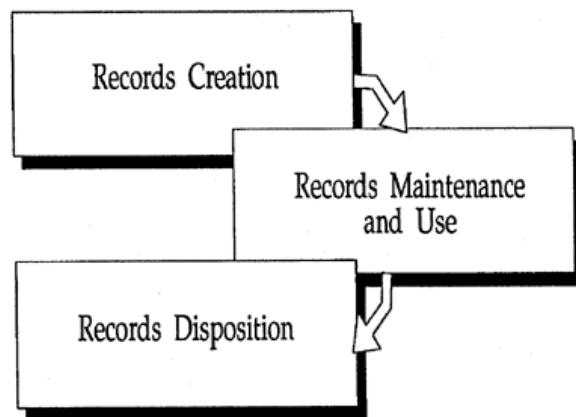
- Using gray, locked Sensitive but Unclassified (SBU) shredding bins;
- Use burn bags and take them to designated storage locations for later destruction.

## VI. Records Lifecycle

### 1) Records Disposition and the Lifecycle of Records

Disposition is an integral part of records management and is the third and final stage of the life cycle of records. According to the life cycle concept as shown in Figure 1-2, records go through three basic stages:

- I. Creation (or receipt);
- II. Maintenance and Use;
- III. Disposition



**Figure 1-2. The Records Life Cycle**

All three stages of the records life cycle are interrelated. Federal records are referred to, depending on the stage they have reached in their life cycle, as “active” or “inactive”. These terms refer not to the date or age of the records, but rather to their use in the current daily work of the office. Disposition means those actions taken regarding Federal records after they are no longer needed in office space to conduct current agency business. These actions include:

- I. Transfer of records to agency storage facilities or NARA records centers;
- II. Transfer of records from one Federal agency to another;



- III. Transfer of permanent records to the National Archives of the United States;
- IV. Disposal of temporary records no longer needed to conduct agency business, usually by destruction or occasionally by donation.

Disposition is a comprehensive term that includes destruction as well as other actions, such as the transfer of permanent records to the National Archives. After appraising agency records, NARA authorizes either their disposal or their transfer to the National Archives for preservation and research. Agencies must also receive NARA's approval before lending records outside the Federal Government, before retiring them to NARA-operated record centers, and before transferring them to other Federal agencies, unless exceptions have been granted. Finally, they must receive NARA's approval before establishing or relocating their records centers and before converting permanent or unscheduled originals to microfilm.

In contrast to disposition, "disposal" in Federal usage refers to only those final actions taken regarding temporary records after their retention periods expire. It normally means destruction of the record content, such as by recycling or burning the record medium. The term is also used occasionally to mean the transfer of temporary records from Federal control by donating them to an eligible person or organization after receiving NARA's approval.

The destruction of Government records is prohibited by law unless authorized by the Archivist of the United States, NARA. The specific instructions/disposition authorities for records that are commonly created and used by all Federal agencies are covered by the General Records Schedule (GRS), issued and maintained by NARA. The process by which all Federal agencies obtain authority for the disposition of their program records is called records scheduling.

All program records produced by FEMA must be scheduled by being appraised by NARA (See sample and link to FEMA Records Management Files Maintenance and Records Disposition- FEMA Records Schedule below). In THD, this process is initiated by the branch requesting a need for retention disposition instructions (a records schedule) from NARA for records for the branch's business purposes by completing a Standard Form 115 (Request For Records Disposition Authority - SF-115) (See Appendix A for example) and working with the FEMA Records Management Section. FEMA's program records that have approved disposition authorities are found in the following link:

[http://on.fema.net/components/msb/ocao/orm/Documents/FEMA\\_Records\\_Disposition\\_Schedule\\_v17.pdf](http://on.fema.net/components/msb/ocao/orm/Documents/FEMA_Records_Disposition_Schedule_v17.pdf)

## **VII. Categories of Federal Records**

### **1) Permanent Records**

Permanent records of FEMA are records of continuing value which are considered to be so valuable or unique in documenting the history of the agency or for informational content that they should be preserved "forever" as part of the National Archives of the United States. Records determined by FEMA and approved by NARA to be permanent must be available in a medium and format that conforms with the standards for permanent records.

FEMA permanent records will be transferred to the National Archives of the United States at the time designated on a NARA-approved Request for Records Disposition (SF 115). When permanent records are transferred to National Archives, legal custody of the records is transferred to NARA at this time. NARA takes measures needed to preserve the records and also provides reference service, including service to the creating agency. Permanent records in

## FEMA THD REPP Records Management Process

THD are programmatic and FEMA mission-related. Some examples of permanent records in THD are as follows:

- I. Final Exercise Reports (REPP and CSEPP) and
- II. Exercise Drills.

### 2) **Temporary Records**

Temporary records are designated for either immediate disposal or for disposal after a specified period of time or an event in accordance with a NARA-approved Request for Records Disposition (SF115) or the General Records Schedule. Temporary records may document FEMA business processes or document legal rights of the government or the public, document government accountability, or contain information of administrative or, fiscal value.

Depending on the type of record, the retention period may range from immediate destruction to as long as 100 years, temporary records will be maintained and disposed of only in accordance with an approved records control schedule. Records classified as temporary should not be retained beyond their authorized retention period; nor will they be destroyed or otherwise disposed of prior to the end of their authorized retention period. Some examples of temporary records in THD are as follows:

- I. Government-Issued Credit Cards and
- II. Contract Management Records (i.e. Statements of Work, Task Orders, etc.).

### 3) **Transitory Files**

Transitory files are records, including email messages, that have no minimal or no documentary or evidential value.

Examples of transitory files are:

- I. Routine requests for information or publications requiring no action or policy decision.
- II. Routine notifications of meetings and other scheduling related activities.
- III. Suspense and tickler files or “to-do” and task lists that serve as a reminder.

### 4) **Unscheduled Records**

Unscheduled Records are those records whose final disposition has not been approved by the National Archives and Records Administration (NARA). Unscheduled records are potentially permanent and must be treated as if they are permanent. DHS will back up electronic records on a regular basis to safeguard against the loss of information due to equipment malfunctions or human error. Duplicate copies of permanent or unscheduled records shall be maintained in storage areas separate from the location of the records that have been copied.

When you encounter unscheduled records you should report unscheduled records or changes in recordkeeping to the RLO, so that she/he can work with the Office of Records Management (ORM) to develop a records schedule through NARA.

### 5) **Vital Records**

Vital records are those records that are essential to the continued functioning or reconstitution of an organization during and after an emergency and also those records essential to protecting

## FEMA THD REPP Records Management Process

the legal and financial rights of that organization and of the individuals directly affected by its activities. There are two types of vital records as follows:

- I. Emergency Operating Records-Documents needed immediately, such as orders of succession, emergency contact records, delegation of authorities, etc. and,
- II. Legal and Financial Rights – Documents essential to protect the legal and financial rights of the Government, and of the individuals directly affected by its activities, such as social security records.

THD is required to identify and provide an inventory of those records that are vital to each of its branches. Each THD Program Lead is responsible for identifying its vital records. FEMA FORM 181-1-2-1- Inventory of Vital Records is used to record identified vital records. A completed example is provided for guidance on how to complete this form and can be found at [http://online.fema.net/mgmt\\_records/forms.shtm](http://online.fema.net/mgmt_records/forms.shtm). THD's RLO identifies and maintains THD Vital Records inventory to support Continuity of Operations (COOP) programs, and submit Vital Records reports to FEMA ORM as required.

### *Identifying vital records*

Reviewing the business processes for your branch and the record they generate and those used in your area of authority, helps determines which records that would be needed in an emergency. Using the 3-tier approach for identification may help:

Authorities	
<b>Tier-1</b> -Records necessary in the first few hours of a crisis	<ul style="list-style-type: none"><li>• Emergency preparedness plan(s)</li><li>• Emergency telephone tree</li><li>• Delegations of authority</li><li>• Security clearance roster</li><li>• Blueprints and maps so emergency workers will know where they are going</li><li>• Policy for talking to the media</li></ul>
<b>Tier 2</b> - Records that involve only that work which is necessary to handle the crisis	<ul style="list-style-type: none"><li>• System manuals for critical electronic databases</li><li>• Regulator information</li><li>• Personnel records</li><li>• Time and attendance records</li><li>• Combinations and/or keys to get into locked areas</li></ul>
<b>Tier 3</b> - Records for specific activities which are the most critical to the Agency's mission	<ul style="list-style-type: none"><li>• Any program specific records on activities that are deemed to be of critical importance, where work cannot be interrupted, even in the worst case. Any records that support work that rises to this level of importance.</li></ul>

## 6) Contracts Records

Contractor records are those records that are created or received and maintained for the Government by contractors. Contractors performing program functions are likely to create or receive records necessary to provide adequate and proper documentation of these programs and to manage them effectively. DHS contracts shall specify the delivery to the Government of all records including data needed for the adequate and proper documentation of contractor-operated programs in accordance with requirements of the Federal Acquisition Regulation (FAR). When contracts involve the creation of data for the Government's use, in addition to

specifying a final product, DHS officials may need to specify the delivery of background data that may have reuse value to the Government.

Before specifying the background data that contractors must deliver to the agency, program and contracting officials shall consult with DHS records and information managers and historians and, when appropriate, with other Government agencies to ensure that all agency and Government needs are met, especially when the data deliverables support a new agency mission or a new Government program. Deferred ordering and delivery-of- data clauses and rights-in-data clauses shall be included in contracts whenever necessary to ensure adequate and proper documentation or because the data have reuse value to the Government.

When data deliverables include electronic records, DHS shall require the contractor to deliver sufficient technical documentation to permit DHS or other Government agencies to use the data. All data created for Government use and delivered to, or falling under the legal control of, the Government are Federal records and shall be managed in accordance with records management legislation as codified at 44 U.S.C. chapters 21, 29, 31, and 33, the Freedom of Information Act (5 U.S.C. 552), and 7 0550.Pub the Privacy Act (5 U.S.C. 552a), and shall be scheduled for disposition in accordance with 36 C.F.R. part 1228.

### **VIII. Standard Operating Procedures**

#### **1) Check-in Procedures for New Records**

##### ***Records Receipt and Tracking***

Records are created and received into THD from various sources, including the Regional program offices, state and local governments, and other Federal agencies. New records come into THD from FEMA regions, United States Army (DoD), the Nuclear Regulatory Commission (NRC), other agencies, and stakeholders. These records are in various formats, such as paper and electronic media (CD's DVD's, e-mails, etc). THD has a Central File Room for the storage of THD paper and electronic media records (i.e. CDs, DVD's, audiovisual materials, etc.).

##### ***Determining Record Status***

THD staff member determines they have a program related record. Each member of FEMA THD will determine if the document they possess is a record or not and if so, it is program related. If there is any question, they should contact the Records Liaison Officer (RLO). It is important to note that the key inputs for this step are: (1) physical mail or email and (2) programmatic records. The key output for this step is: (1) determination that the document is a record and program related.

##### ***Coordinating with the RLO on Delivery***

The FEMA THD staff member should contact the RLO for determination for method and location for delivery of program record. The key inputs for this step are: (1) knowledge of who RLO is and (2) The location of RLO office. The key outputs for this step are the record delivery instructions.

##### ***Delivering the Record to the RLO***

The FEMA THD staff member shall deliver the program record to the RLO. The key inputs for this step are: (1) the RLO physical location and (2) the RLO e-mail inbox, if electronic. The key output for this step is: (1) the delivered program record.

***Receipt of Program Related Records***

This process begins with the Records Liaison Officer receiving the program record from the FEMA THD staff member. The key inputs for this step are: (1) RLO in-box and (2) delivered program record. The key output for this step is: 1) the program record is received by the RLO.

***Reviewing and Categorizing Records***

The FEMA THD RLO will review the program record and categorize the record for appropriate filing. The key inputs for this step are: 1) The applicability of FEMA records retention and disposition schedules. The key output for this step is: 1) Program record is reviewed and (2) program record is categorized.

***Confirmation of Records Receipt***

The FEMA THD RLO will notify the record owner with an acknowledgement of the records' receipt and filing location. The key inputs for this step are: (1) knowledge of program record file protocol and (2) record filing. The key outputs for this step are: 1) E-mail record owner, acknowledging receipt confirming the record's filing location.

***Incoming THD Records***

**Incoming THD Records**

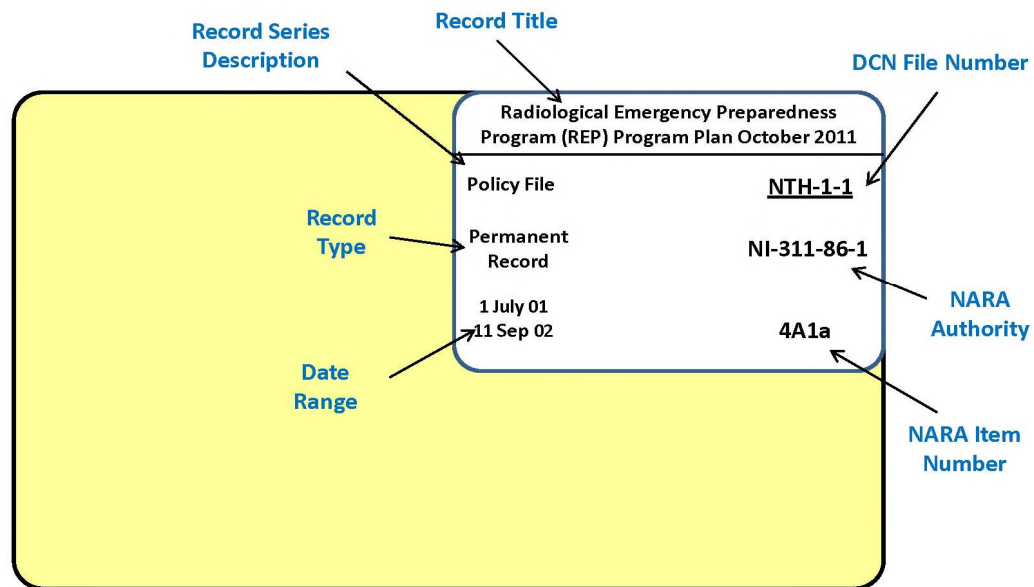
<b>REPP Branch Records</b>	The REP branch's records currently come into THD as paper in the form of letters, correspondence, reports, etc. as well as, physical electronic media formats, such as CD's, floppy disks, DVD's, audiovisuals, microfiche, etc. and shall be logged and tracked by THD Action Tracker by the THD Action Office. These records are then forwarded to the THD RLO and the REP Records Custodian for documentation and filing.
<b>CSEPP Branch Records</b>	The CSEPP branch's records currently come into THD mainly in the form as electronic records. These records are mainly email records. These records are received by each staff member of CSEPP and shall be forwarded to the THD Action Office for processing as records. CSEPP also manages input source records that are entered into the CSEPP Portal.
<b>Business Operations</b>	Business Operations records currently come into THD in the form of paper and electronic media. These records, whether paper or electronic, shall be forwarded to the THD Action Office for processing as records. The THD Action Office shall log each record into the THD Action Tracker and then forward the records to the RLO and the Records Custodian for documentation and filing.
<b>Professional Services</b>	Professional Services records currently come into THD in the form of paper and electronic media. These records, whether paper or electronic, shall be forwarded to the THD Action Office for processing as records. The THD Action Office shall log each record into the THD Action Tracker and then forward the records to the RLO and the Records Custodian for documentation and filing.

***Paper and Physical Electronic Media Records Process***

- I. Log document onto the THD Document Tracking Log and enter under the "Documents" tab and route on to perspective THD branch point of contact for review.
- II. Materials that are official records are routed to RLO and assigned a document control number as per THD's Document Control Number Instruction 100-1 stored in THD's Central File Room.

## FEMA THD REPP Records Management Process

- III. Records are then filed and/or interfiled within a folder that identifies the contents by an affixed label on the folder in the upper right hand corner (see example below) with the following information: record title (i.e. Radiological Emergency Preparedness Program (REP) Program Plan October 2011), records series description (i.e. Policy File), file number (i.e. NTH-1-1), record type (i.e. permanent or temporary), date range of records (to determine and calculate disposition retention) the National Archives and Records Administration (NARA) Authority (i.e. NI-311-86-1) and NARA Item Number (i.e. 4A1a).



*File Header Label Example*

- IV. After the record has been processed into THD's Central Files, the record owner will receive an email from the RLO confirming the new record's document control number and the location of the record.

All new THD paper records shall be accompanied by a THD Records Check-In form (this form is given RLO/RC prior to filing a new record in the Central File Room). Records shall be indexed with descriptive information, such as media format (i.e. paper or electronic media type [CD or DVD, etc.] for to version control when they are being prepared for filing and indexing.

### 2) Managing Electronic Records

Records and related program documentation stored on shared resources should only include approved final versions of programmatic:

- Reports (i.e. CSEPP Reports to Congress)
- Policy Documents (i.e. REP 10 and NUREG-0654)
- Briefing (Mission and Programmatic) Materials (i.e. Fukushima)
- Audit Records (GAO Audit Responses)
- Committee Meeting Minutes (i.e. Federal Radiological Preparedness Coordinating Committee or FRPCC)

## FEMA THD REPP Records Management Process

Naming conventions for files should be consistent to enable quick identification of files from other users. Please ensure that the document file's title name will also appear on your shared workspace:

- Documents of a common type should have a common naming convention;
- Implement office or program symbol followed by common sense names followed by the date

Federal records should always have specified dates, as some Federal records are subject to the Freedom of Information Act (FOIA) requests, as well as responses. Specific examples are shown below:

- NTH1-2- REPP- Indian Point Energy Center IFR December 2010
- NTH-6-1-1 CSEPP – Deseret Exercise August 2007
- WNG-5-1 Robert E. Ginna Nuclear Power Plant After-Action Report June 2011

The THD ESW site should not be used for routine storage of day-to-day or working files. Only drafts that which contain substantive comments should be captured and stored temporarily on shared workspaces. Outdated or superseded documents should be removed from the ESW site on a regular basis.

Files removed from the site should be either archived, as per DHS/FEMA records management policies and procedures or deleted based upon content. Work with THD's RLO to establish appropriate filing storage spaces for official Federal records.

### 3) Managing E-mail Records

An email record is a document created by or received via an electronic mail system which meets the definition of a Federal record as specified in 44 U.S.C. 3301. An e-mail is a Federal record:

- When it provides key substantive comments on draft action memorandum and/or if the e-mail message adds to a proper understanding of the formulation or execution of action;
- If it provides documentation of significant Agency decisions and commitments reached orally and not otherwise documented in files
- If it conveys value on important activities, and if the e-mail message adds to a proper understanding of operations and responsibilities.

As a THD employee, it is up to you to make the determination that if electronic mail (email) is a Federal record. The sender and the person who receives electronic mail independently determine whether or not the message and its attachments meet the definition of a Federal record for their program branches. Electronic mail determined to be Federal records falls into three categories: permanent records, temporary records, and transitory records. Draft documents that are circulated on e-mail systems might be records if they meet the criteria specified in the records definition. Additionally, e-mail calendars or appointments, attachments and task lists for users may also be considered records, depending on the content and purpose.

Recordkeeping systems that include E-mail messages must:

- Provide for the grouping of related records into classification according to the nature of the business purposes the records serve;

## FEMA THD REPP Records Management Process

- Permit easy and timely retrieval of both individual records and files or other grouping of related records;
- Retain the records in a usable format for their required retention period as specified by a NARA- approved records schedule
- Be accessible by individuals who have a business need for information in the system.

In streamlining and grouping official Federal email records, as a best practice, it is recommended to create folders with consistent naming conventions in which to store your program email records. Set up folders with a filing structure which follows the Federal Enterprise Architecture's Line of Business (FEA LOB). This maintains consistency across the board, which allows for seamless data migration of data to future agency-wide document and records management applications. As the agency's email management system is not intended as a recordkeeping system, it is advised as per DHS and FEMA policy to print-and-file records which have long-term programmatic value.

FEMA originators or users of e-mail messages that are official agency records may copy (archive) the messages on their PC as long as the archived message is not retained and treated as official agency records. The printed copy of an e-mail message is considered the official record copy; the electronically archived copy is considered a convenience, non-records. REPP, CSEPP, Business Operations and Professional Services all generate e-mail records that are to be managed as per FEMA's current email policy below:

### ***Creating and/or receiving e-mails:***

- I. The responsibility to identify and manage an email record belongs to its author (if internal) or the chief recipient (if received from an outside organization). When records are received in e-mail, the managing party shall immediately forward a copy of the e-mail record to the THD Action Office for tracking and processing that record;
- II. If the email provides documentation of a team project or a collaborative effort that is copied to multiple addresses, the team must assign responsibility to a specific individual for forwarding the e-mail record to the THD Action Office for tracking and processing.

The email subject line should contain as full and complete a description as practical. Avoid using generic titles like "meeting", "report", or "important". FEMA's email policy states that there are two terms in which emails are to be retained, short-term and long-term. All e-mails are saved and backed up at Mount Weather on the server's repository.

### ***Short-term e-mails***

Short-term emails have a 90 day to 1 year value, with minimal or no documentary or evidential value, that can remain in the user's email folder or shared drive until they are purged. Examples of short-term email records include:

- I. General Administrative or "housekeeping" records received for general information purposes;
- II. Emails received for purpose that require no action and are not required for documentation of specific functions.

### ***Long-term e-mails***

Long-term emails are emails that require longer term (more than 1 year) retention that must be handled in a manner that allows for access and retrieval over time. (Please refer to FEMA



## FEMA THD REPP Records Management Process

Files Maintenance and Records Disposition - FEMA Records Schedules). Examples of Longer-Term email records include:

- I. Program or project records that document important decisions and where there is little likelihood that the decisions are documented elsewhere (i.e. data regarding an IT project or program on progress, termination, or other decisions);
- II. Program or project records that require administrative action, a policy decision, or special compilation or research for reply (i.e. COTR records, hiring/termination of contractors, deliverables or policy questions and answers or data call response;
- III. E-mail messages sent and received documenting actions during an emergency situation, disaster response, or Continuity of Operation (COOP) activities.

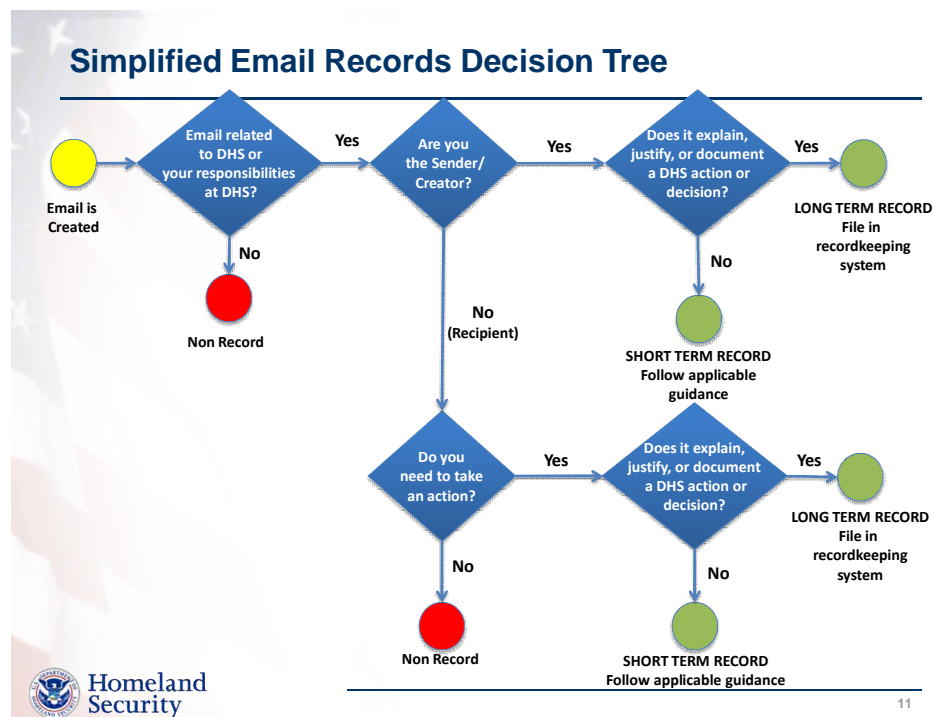
### ***Deleting e-mails***

If the retention for the record is less than 90 days or if it is a “transitory record”, it can be deleted when no longer needed for business purposes. Most emails will fall under the category of a “transitory record. Examples of transitory e-mail records include:

- I. Routine requests for information or publications and copies of replies which require no Administrative action, no policy decision, and no special compilation of research for reply;
- II. Quasi-official notices including memoranda and other records that do not serve as the basis of official actions, such as notices of holidays or charity and welfare fund appeals, bond campaigns, and similar records;
- III. Records documenting routine activities containing no substantive information, such as routine notifications of meetings, scheduling of work-related trips and visits, and other scheduling related activities; and
- IV. Suspense and tickler files or “to-do” and task lists that serve as a reminder that an action is required on a given date or that a reply to action is expected, and if not received, should be traced on a given date.

### ***Deleting e-mails that have been printed and retained in hardcopy***

Email should be kept in their original digital format. This includes any and all attachments associated with that email. However, if an email is to be kept for longer than 180 days it is required to be managed in a records system. According to 36 CFR 1236.22, “Email records appropriate for preservation for less than 180 days may be managed on live email systems and allowed to be deleted as part of automatic processes, without a user further needing to print out or electronically archive”.



### ***Requesting records from the THD Central File Room***

When records are requested from the THD Central File Room, the requestor must:

- I. Notify the RLO by submitting an emailed request with the details of the request, such as the record title, if known, site or subject matter of the document, the year(s) of the record, if known, etc. The RLO will respond to all requests and provide a response in a timely manner.
- II. Sign out any records removed from the THD Central File Room. Records shall only be signed out by the staff member requesting the records.

### ***Returning Records to the THD Central File Room***

Once records requestor has completed their usage of a record requested from the THD Central File, they must:

- I. Notify the RLO that the record is ready to be returned to THD File Room.
- II. Sign the record back in on the Check-In/Check-Out Log located on the clipboard outside of the door of the THD Central File Room.
- III. The RLO will update the record return information in the THD official recordkeeping system and re-file the record.

## **4) The Path of FOIA Correspondence**

The FEMA Records Management Division (RMD), Disclosure Branch is responsible for administering policies, programs, and procedures to ensure FEMA's compliance with the FOIA and the Privacy Act (PA), 5 U.S.C. § 552 and 5 U.S.C. § 552a, respectively. Ideally, the FOIA requestor will include enough file-related information (type of document, title, subject area, date of creation, originating office) or enough event-related information (date and circumstances surrounding the event the record covers) in order for the Disclosure Branch to expeditiously ascertain the most appropriate FEMA office to gather and compile the information and allow the program enough time to conduct a focused, thorough and efficient search.

## FEMA THD REPP Records Management Process

In order to ensure timely responses to requestors, RMD has established the following timeframes:

- I. New FOIA requests will be sent to the Program/Regional Office by the Disclosure Branch within 3 days of receipt.
- II. Calls and emails from FOIA POCs in the program/Regional Offices will be responded to and/or directed to the appropriate individual within the Disclosure Branch within 5 working days.

### 5) **Processing FOIA Requests in THD**

Any FOIA package that RMD deems to fall within the purview of NPD for response will be submitted to the NPD Action Office for assignment to the appropriate Division. The THD Action Office will serve as the single point-of entry for all inbound correspondence, with the administrative representative as the primary point of contact (POC). Alternate POCs will be designated on an as-needed basis and shall follow these same guidelines.

#### ***THD AO Staff:***

- I. Receives the FOIA package from NPD AO and log it into the THD Action Tracker;
- II. Provides copies of the package to THD OCC for review and triage;
- III. Provides a recommendation to the THD Business Operations Branch Chief on the THD component most appropriate to take the lead on responding to the FOIA;
- IV. Assign the FOIA package to the appropriate Branch Chief with a requested deadline for return.
- V. Request the Branch Chief to designate a staff POC to lead the effort.

#### ***THD Staff:***

- I. Serve as the lead POC for gathering information from THD staff and Region(s) if necessary.
- II. Compile the information, fill out appropriate forms and draft the response for Management review.

#### ***FOIA Processing Fees:***

FOIA provisions allow the agency to recover part of the cost of complying with your request. All fees are assessed in accordance with the Department of Homeland Security FOIA/PA regulations. The fee rates are as follows:

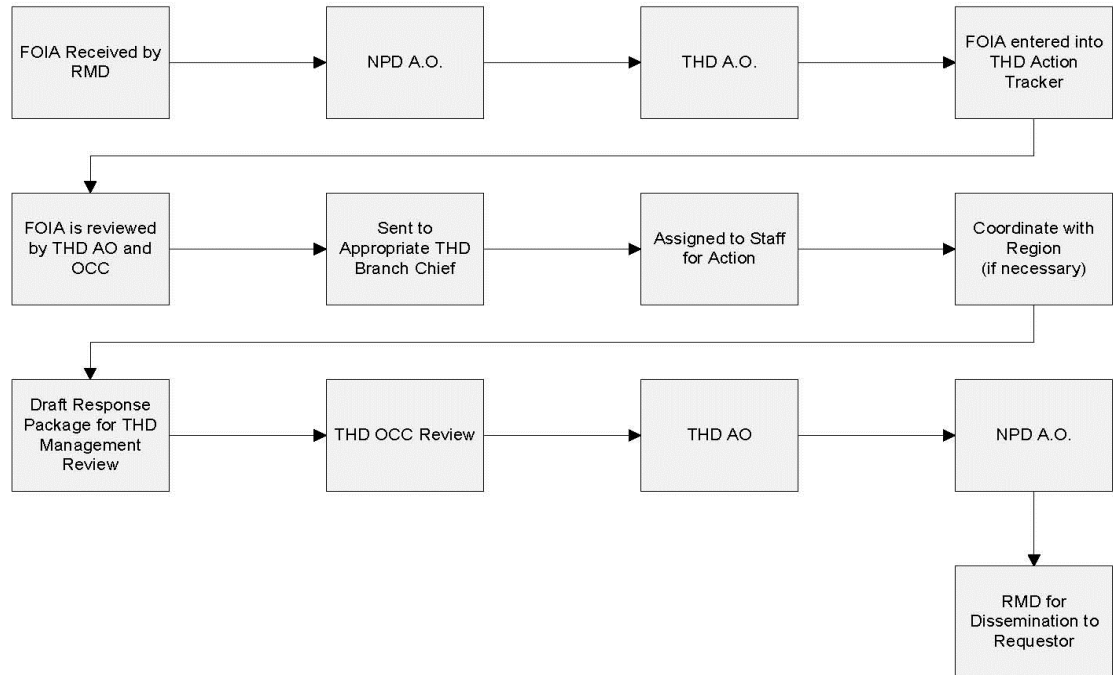
- I. The standard fee for the duplication of documents is 10 cents per page.
- II. A clerical-level employee search or document review costs \$4 dollars per 15 minutes.
- III. A professional-level employee search or document review costs \$7 dollars per 15 minutes.
- IV. A managerial-level employee search or document review costs \$10.25 dollars per 15 minutes.

#### ***Fees are charged differently to each of three categories of requestor:***

- I. Commercial requesters are charged for search time, document review, and duplication costs.

## FEMA THD REPP Records Management Process

- II. News media, educational, and scientific requesters are charged for any duplication costs after the first 100 pages of responsive documents.
- III. All other requesters are charged for document search time in excess of two hours plus any duplication costs after the first 100 pages of responsive documents.



*FOIA Process Flow Diagram*

### 6) File Plans

A file plan is a document that lists the records in your office, and describes how they are organized and how they are maintained. The following are the fields you will see in your THD records file plan:

- I. File Number,
- II. Series Title,
- III. Federal Enterprise Line of Business,
- IV. THD's Application,
- V. Series Description,
- VI. Disposition,
- VII. Record Type,
- VIII. Cutoff,
- IX. Transfer to FRC Years,
- X. Retire Years,

XI. NARA Authority (Disposition Authority), and

XII. NARA Job Item Number.

7) **Records Retirement, Storage, Transfer, and Destruction Procedures**

This section establishes guidelines and procedures for the systematic retirement of records to a NARA Federal Records Center (FRC). NARA is chartered by the Federal Records Act of 1950 to establish, maintain, and operate records centers for storing and servicing Federal Government non-current records. Retiring inactive or non-current records is essential to release high-cost space and equipment for the maintenance of current files. FRCs save space and money; five times as many records can be stored per square foot in records center space as in equivalent Agency office space.

***Records Retirement***

Retired records are subject to recall and reuse. Effective controls must be maintained over records regardless of whether or not they are retired to a FRC. Records will not be sent to a FRC in lieu of disposal in accordance with approved records disposal schedules. Records must have at least 1 year remaining before destruction eligibility in order to be retired to a FRC. Some FRC's, because of space restrictions, extended this restriction to records having at least 3 years remaining. Non-records will NOT be sent to a FRC. The frequency of references generally provides a good measure for the timing of transfers or the establishment of retirement periods. Retire records when reference diminishes sufficiently to permit removal without impairing current operations. Small amounts of records (less than 1 cubic foot) are not retired as a sole transfer action. Wait until at least two boxes are ready for transfer. Retire records at annual intervals except when the volume involved warrants more frequent transfers.

***Retirement Deviations***

The FEMA Records Officer is authorized to approve specific deviations from retirement procedures on an individual basis. Deviations apply only to record retirements. No records will be destroyed sooner than authorized by approved disposal standards unless the standards are officially changed. The FEMA Records Officer must approve in writing exceptions to retirement procedures. Information copies are furnished to the applicable Records Liaison Officer and Records Custodian.

***Records Retirement and Destruction Determinations***

Organizational elements must retain, as current records, only the minimum volume of records necessary for efficient operations. The disposition schedules include specific retirement and destruction instructions. A general criterion for retirement includes the following:

- I. Destroy official records ONLY according to the disposition schedules in this manual.
- II. Retire inactive records that must be retained more than 3 years to the appropriate FRC.
- III. Do not retire records if they are to be destroyed within 3 years of transfer.
- IV. Do not retire less than 1 cubic foot of records as sole transfer actions.
- V. Destroy non-record material when its purpose has been served.

***Timing of Transfers***

Retire records at annual intervals except when office retention requires additional filing equipment, file volume warrants more frequent transfers, OR the cutoff period covers more than 1 year of accumulated records, as in the case of a small or general correspondence file

with a long retention period.

### ***Retirement of Records to an FRC***

The National Archives and Records Administration (NARA) provides maintenance and operates records centers for the storage and reference of non-current Federal Government records. Federal Records Centers (FRCs) are located throughout the U.S. on a regional area basis.

The National Personnel Records Center in St. Louis, Missouri, provides storage for official personnel files (OPFs) and payroll records. Records transferred to FRCs remain under the ownership of, and are subject to access restrictions imposed by, the depositing agency. Regions and field establishments will retire eligible records to the nearest center.

### ***Initiating Retirement***

When records become eligible for retirement to a FRC, the program/office custodian of the records will complete the Standard Form 135(s), Records Transmittal Receipt (SF 135) (see Appendix A for SF-135 example), and records/file inventories, and at:

- I. ***Headquarters:*** Send the forms to the FEMA HQ Records Management Section via Email box [fema-hqrecords@dhs.gov](mailto:fema-hqrecords@dhs.gov) alone with any other information on the nature of the records proposed for retirement. The FEMA Records Management Section provides the necessary forms, boxes, advice on transfer operations, and arranges the transfer to the WNRC;
- II. ***Regions and Field Establishments:*** Send the forms to your assigned RLO via Email. The RLO provides the necessary forms, boxes, advice on transfer operations, and arranges the transfer to the Regional FRC.

### ***Review Prior to the Transfer***

Prior to boxing records for shipment, screen them and remove and destroy documents or folders from file series no longer needed and having no value. Remove blank or duplicate pages, pins, pencils, paper clips, and other non-file material as these can damage the paper. Review to eliminate duplicate or other non-records material, limit reviews to complete folders, binders or entire subject classification. Do not undertake document-by-document reviews as it is impractical and uneconomical.

### ***Uniformity***

Do not pack records of different file series designations or widely varying retention periods in the same box or transfer case. If a box contains records of different retention periods, the longest expiration date will be used to determine the disposition date. For example, records with slightly different periods, such as 5 and 6 years, may be packed in one container. In this instance, the container and all the contents are held until the expiration of the 6-year period.

### ***Packaging Records***

Each container box accommodates 15 linear inches of letter-size or 12 inches of legal size files (1 cubic foot capacity). In headquarters, after records transfer approval, the Records Management Section furnishes record center boxes to the requesting office. In regions and field establishments, the Records Liaison Officer provides records center boxes to the requesting office.

### ***Packing Boxes***

When packing records in boxes, retain the normal filing arrangement in which the records were maintained within the transferring organization.

## FEMA THD REPP Records Management Process

- I. Pack records firmly in the box without disturbing the existing file arrangement. Do not pack so tightly as to hinder withdrawal for future references.
- II. Face all folders in the same direction. Do not pack file guide cards. Place letter-size files facing the end of the box and legal-size facing the side of the box.
- III. Fill each box completely, but do not over pack boxes to cause bulging.
- IV. Pack the remaining space of partially filled boxes with wadded paper.
- V. Wrap oversize and undersize records, such as ledgers, equivalent to less than one-half box, separately in heavy wrapping paper. Tie or tape the package securely and label and number each package as if it were a box.
- VI. Number boxes beginning with number in the space provided on the box.

### *Shipping Records*

Transferring records to a records center should be accomplished as soon as possible after the Agency has received approval from the FRC. A shipping delay of more than 30 days results in the return of the SF 135, requiring resubmission of the paperwork.

The most economical means available is used to ship files to the records center. If records are to be moved only a short distance, records center trucks may be available to pick them up. Otherwise, records may be transferred by regular U.S. mail for small shipments (under 70 pounds) or by commercial motor or rail freight for larger shipments. Enter the following description on bills of lading or other shipping documents to obtain the lowest freight rate: Records, Office, Old, "The agreed or declared value of the property is hereby specifically stated by the shipper not to exceed 31/2 cents per pound." Shipping regulations require boxes to be sealed and addressed. Properly packed containers weigh approximately 25 to 30 pounds each. Headquarters transfers are handled by the FEMA HQ Records Management Section.

### *Instructions for Completion of the SF-135*

Records eligible for retirement to a FRC require the completion of an SF 135 and a records/file inventory. These forms serve to record the transfer of files to a FRC providing an inventory sufficiently detailed to assist in the reference, retrieval, and ultimate disposition of FEMA records. Use the form instructions and the following guidelines for completing the SF 135 and records/files inventory forms:

- I. **Block 1 – To:** Enter the FRC mailing address of the regional FRC in which the records are to be stored.
- II. **Block 2 - Agency Transfer Authorization:** Leave blank. The FEMA Records Officer or Records Liaison Officer signs and dates this block.
- III. **Block 3 - Agency Contact:** The transferring office enters the name, office, and telephone number of the official familiar with the records to be transferred.
- IV. **Block 4 - Records Center Receipt:** Leave blank.
- V. **Block 5 – From:** Headquarters organizational elements leave blank; regional offices and field establishments follow the instructions outlined in this particular block and forward a copy of the completed SF 135 to the FEMA Records Officer.
- VI. **Block 6 - Records Data:** Information entered in these blocks and on the records/files inventory is based upon individual accessions and their assigned numbers. An accession consists of records being retired that have one disposal authority and one

disposal date. When the authority or disposal date changes, the accession number changes.

The FRCs will not accept accessions with mixed records in them. Do not mix records with varying disposal dates in the same container. Headquarters organizational elements obtain accession numbers from the FEMA Records Officer. Regional offices are notified of their accession numbers by the appropriate FRC after transmitting the SF 135.

- I. **Block A - RG:** Enter 311.
- II. **Block B – FY:** Leave blank.
- III. **Block C – Number:** Leave blank.
- IV. **Block D – Volume:** Enter the total number of boxes for this shipment.
- V. **Block E - Agency Box Numbers:** Leave blank on SF 135. List the box numbers on the records/files inventory.
- VI. **Block F - Series Description:** On the SF 135, the transferring office first enters its organizational code, and then gives the complete description for the record series and the month/year representing the most current date the collection of records were closed or cut-off. On the records/files inventory, in addition to the series description, describe the contents of each box in sufficient detail to enable the FRC to retrieve the box or record/folder in case of a reference request. Also use this section to identify any special status the records may have, such as a records freeze or the Privacy Act.
- VII. **Block G – Restrictions:** The transferring office enters the appropriate code for any restrictions for access to the records. Codes are listed on the back of the SF 135.
- VIII. **Block H - Disposal Authority:** Enter the appropriate FEMA records series code, the NARA disposition authority number.
- IX. **Block I - Disposal Date:** If the preparer has taken the Files Improvement and Records Disposition course, this item is explained during that course. Otherwise, contact your RLO or the HQ Records Management Section for the correct entry for this item.
- X. **Blocks J, K, L, and M:** Leave blank. These items will be completed by the FRC.

***Distribution of the SF-135***

*Headquarters:* After the SF 135 and records/file inventory has been fully completed, forward a copy to the FEMA HQ Records Management Section for review and approval. The FEMA HQ Records Management Section forwards a copy to the FRC and retains a copy. A copy is returned to the transferring office upon completion of records transfer, showing the assigned accession number and FRC shelf storage location.

*Regions and Field Establishments:* After the SF 135 and records/file inventory has been fully completed forward a copy to the assigned RLO for review and approval. The RLO forwards a copy to the FRC and retains a copy. A copy is returned to the transferring office and the HQ Records Management Section upon completion of records transfer, showing the assigned accession number and FRC shelf storage location.

*Transfer Requiring a Record Group (RG) Number:* Records transferred to an FRC or the National Archives require an RG number. The FEMA RG number is 311. Predecessor Agency records consist of records dated prior to April 1, 1979. The following are Predecessor Agency RG numbers:



### *Agency RG:*

- I. Office of Emergency Preparedness 396
- II. Defense Civil Preparedness Agency/Office of Civil Defense 397
- III. Office of Civil Mobilization 304
- IV. Department of Housing and Urban Development 207
- V. National Fire Prevention Control Administration 437

### ***Reference Services***

Requesting offices supply the accession, box, and shelf number as sufficient description to permit ready identification of the desired box. Reference service requests are handled as expeditiously as possible and, as a general rule, 1-day service is provided. Servicing is for entire boxes, not individual folders. Once received, requesting offices will maintain boxes of records withdrawn from the FRC separate from the active office files. When returned, the records will be returned to the FRC in the same boxes and in the same order as originally stored. An OF 11, Reference Request Federal Records Center, is used when requesting reference service in writing. (See Appendix A for an OF-11 example) Also available is on-line reference service via the Central Information Processing System (CIPS) at the FRCs. Regional and Field Records Liaison Officers can contact the local FRC to gain access to this system. At headquarters, this service is available from the FEMA Records Officer.

Offices wishing to permanently withdraw records from the FRC will notify the FEMA Records Officer in writing, giving the accession, location, and box numbers, and, as appropriate, folder titles of particular records to be withdrawn.

### ***Transfer of Records other than to FRCs***

While most records are subject to retirement to a FRC, a lesser amount may also be moved or assigned to another organization outside FEMA.

### ***Transfers within FEMA***

Records are transferred within FEMA only when authorized by official directives prescribing changes in organization or reassignment of functions. When this occurs, the FEMA Records Officer must receive notification by memorandum of the volume and description of records.

### ***Transfers to other Federal Agencies***

FEMA records may be transferred to another agency when it is in the best interest of the Federal Government. Such transfers, however, are subject to the prior written approval of NARA. Offices desiring to transfer records to other agencies (except FRCs and the National Archives) must submit their proposals in writing to the FEMA Records Officer for coordination and decision. Include the following information in the proposals:

- I. A concise description of the records to be transferred, including the volume in cubic feet;
- II. A statement of the restrictions imposed on the use of the records;
- III. A statement of the number of reference requests per month made on the records, with information as to the agencies and persons using the records and the purpose of such use;
- IV. A statement of the number of persons, if any, assigned to the administration of the records;

- V. A statement of the proposed physical and organizational locations of the records;
- VI. Information as to why the proposed transfer is in the best interests of the government; and
- VII. A justification for the transfer of records more than 5 years old.

***Transferring Records to the National Archives for Permanent Retention***

The NARA is authorized to accept those records that the Archivist of the United States determines have sufficient historical or other value to warrant permanent retention. Permanent records may include audiovisual records such as motion pictures, still photographs, sound recordings, magnetic tape master files, and cartographic records such as maps.

***Request to Transfer to the National Archives***

To transfer records to the National Archives, a Standard Form 258, Agreement to Transfer Records to the National Archives of the United States (SF 258), must be prepared. This form is used to transfer permanent records of FEMA to the National Archives in accordance with approval FEMA records disposition schedules. The SF 258 can also be used to make a direct offer to the National Archives. Unscheduled older records or possibly valuable records no longer being created can be offered directly to the National Archives without going through the records scheduling process. This form can be initiated by either the FRC or FEMA's Records Officer, depending on the location of the records to be transferred or offered to the Archives.

***Records over 30 Years Old***

Agency records over 30 years old can be transferred to the National Archives by action of the Archivist of the United States unless the Director, FEMA, notifies the Archivist in writing that the records are still needed for current business.

***Legal Title to Transferred Records***

When records are transferred by using an SF 258 to the National Archives, legal title to the records passes from FEMA to the Archivist of the U.S.

***Transfers to the Presidential Library***

Near the end of a President's term, a White House representative or the National Archives may request copies of records generated by the Director, FEMA, and other high officials for inclusion in a Presidential Library. These requests must be coordinated with the FEMA Records Officer.

***Transfer of Official Personnel Files (OPFs) and Payroll Records***

OPFs and related payroll records are retired to the National Personnel Records Center (NPRC).

***Transfer of OPFs***

The OPFs of employees who are separated from FEMA are placed in an inactive file upon their separation. Thereafter, once each month, these inactive folders are transferred to the National Personnel Records Center (NPRC).

- I. Loose papers to be included in OPFs previously sent to the NPRC using Standard Form 127, Request for Official Personnel Folder (SF 127) (separated employee), are forwarded, providing the papers to be added to the individual's folder. Use a separate SF 127 to transmit the papers for each individual.
- II. Complete blocks 2, 4, 5 (insert the employee's separation date in this block), and 6c.

- III. Every effort must be made to locate all documents required to be in the folder and to file them before the folder must be thoroughly screened of all temporary material, as defined in the Federal Personnel Manual (FPM). Retire only those papers that the FPM specifically designates to be permanently included in the folder in the OPF. Each document to be interfiled must show the current name of the employee, the name under which the employee was formerly employed if different from the current name, date of birth, social security number (SSN), and date of separation.
- IV. After termination of employment, remove the employee's OPF from the active files and check carefully for completeness. Remove and destroy the temporary material on the left side of the folder. Retain only those medical records specified for inclusion by the FPM and final leave statement (SF 1150, Records of Leave Data, or equivalent). Record the employee's date of birth and SSN on the folder tab.
- V. The center will not acknowledge receipt of OPFs.

### ***Payroll Records***

Because of their value as auxiliary personnel records, center payroll records (such as individual earning and service cards, final leave records cards, and, in some situations, memorandum copies of payrolls) are transferred to the center. Where practical, transfer these records in the standard boxes used by the FRCs. Forward SF 135s and 135-As in duplicate to the center.

### ***Emergency Destruction of Records***

Records may be destroyed, in certain situations, regardless of schedule provisions or other authority. Emergency conditions involve the following:

- I. Records whose physical condition makes them a menace to human life and property. They may be infested with vermin or housed under such adverse conditions that they cannot be used or repaired. Prior approval of NARA must be obtained in accordance with National Archives records disposition regulations.
- II. Still or motion picture film with a nitrocellulose base that has deteriorated to the extent that it is a threat to human life and property. NARA must be notified within 30 days after destruction.
- III. Records that may fall into the hands of a potential or actual enemy when a state of war exists. These may be disposed of immediately. Records of temporary value occupying space urgently needed for military purposes may also be destroyed immediately.

### ***Records Storage Facilities***

The standards for records storage facilities are regulated by 36 CFR part 1228, subpart K, and apply to Government-owned or leased records storage facilities, whether operated by NARA, another agency, or an agency contractor. The standards also apply to any commercial records center that an agency uses to store its records. The standards are detailed in NARA bulletin 2005-7 and highlight that:

- I. Agencies must ensure that they have met the facility approval, inspection, reporting requirements specified in 36 CFR 1228.240 for all storage facilities that currently house their records, and that the requirements are followed whenever the agency acquires or uses new agency storage space or contracted storage services. Agencies do not have to request approval to use NARA records centers.

## FEMA THD REPP Records Management Process

- II. Agencies that have not previously requested NARA approval or submitted the required documentation for commercial storage facilities must do so as soon as possible, but no later than January 31, 2006.
- III. NARA will advise agencies on meeting the standards at agency or commercial facilities, including consultation when an agency is planning to build or lease a storage facility or to use a commercial center. When requested by an agency or deemed necessary by NARA, NARA's Space and Security Management Division will inspect facilities that store more than 25,000 cubic feet of Federal records to ensure compliance with the standards. A regularly-updated list of certified facilities is posted on NARA's web site.

## IX. Roles and Responsibilities

### 1) Records Liaison Officer (RLO)

- I. THD's Records Liaison Officer (RLO) is designated by the Division Director and has the authority to conduct an efficient and effective records management program. Acts as THD's records liaison to the FEMA Office of Records Management (ORM), attending ORM records management meetings, and promoting the Department of Homeland Security's (DHS) and FEMA records management policies and procedures within THD.
- II. Retrieves and analyzes records received from RC from THD Branches to determine retention and disposition.
- III. Ensures that program records are accurate and complete, and that THD staff members remain accountable for the safeguarding of THD records.
- IV. Oversees the maintenance and management of all incoming and outgoing records, as well as, the monitoring of active and inactive records created or received by THD for official use.
- V. Facilitates and oversee the process of the disposition of records from all THD Branches to the National Archives and Records Administration's (NARA) Federal Records Center (FRC).
- VI. Stores and maintains records in a centralized file (i.e. THD File Room) area, organized by THD Branches, regions, sites, and subject classifications.
- VII. Develops a standardized a divisional file plan for THD, index approaches and/or finding aids to streamline the organization and use of, access to, and integration of information within the organization.
- VIII. Ensures that THD Branches establish, and maintains their file plans in accordance with the THD divisional file plan, and conducts regular records inventories.
- IX. Implements THD records management procedures in accordance with the FEMA Records Management Program Directive, FEMA Records Disposition Schedule, as well as NARA regulations and authorities governing the creation, receipt, maintenance, and disposition of records.
- X. Appraises THD records periodically for their preservation, and performs annual records audits of all THD Branches.

## FEMA THD REPP Records Management Process

- XI. Identifies and maintains THD Vital Records inventory to support Continuity of Operations (COOP) programs, and submit Vital Records reports to FEMA ORM as required.
- XII. Retrieves all FOIA request package records for filing, storage and custody in the THD File Room, upon completion of all action activities. These records are to be retained in THD File Room until they are eligible for their perspective dispositions.
- XIII. Facilitates and provides records management training to all THD Branches.
- XIV. Submits required reports to FEMA's Agency Records Officer on records holdings and records disposition activities.

### 2) Records Custodian (RC)

- I. Submits required reports to FEMA's Agency Records Officer on records holdings and records disposition activities.
- II. Receive incoming THD records from FEMA regions, United States (U.S.) Army, the Nuclear Regulatory Commission (NRC), other agencies, and stakeholders.
- III. Ensure that all incoming records are logged on the mail receipt log.
- IV. Log entries into THD official recordkeeping system, ensuring that all duplicate documents, which are non-records are disposed of.
- V. Ensure that all documents logged are assigned a document control number from the THD official recordkeeping system.
- VI. Maintain primary responsibility for THD records created or received within their area of responsibility, following all THD policies and procedures established by the RLO.
- VII. Maintain file plans for their program, updating them as required, in coordination with the RLO.
- VIII. Coordinate with RLO, the receipt of records requests from their perspective Branches, the retrieval, as well as, the deliveries of documents to requesters.
- IX. Ensure that electronic mail messages created or received, meet the definition of a Federal record, and are handled in accordance with established procedure.
- X. Print out incoming emails with attached documentation upon receipt that have been deemed as a record.
- XI. Conduct bi-monthly retrieval of records from THD Staff members to submit to RLO for storage in THD File Room. These records shall have document control numbers affixed to them prior to THD File Room custody and storage.
- XII. Coordinate THD records management activities with the RLO (i.e. records disposition and retention).

### 3) FOIA Coordinator

- I. Serves as the single point-of entry and exit for all inbound FOIA requests and outgoing FOIA responses.
- II. Receives the FOIA package from the NPD Action Office (AO) and logging it into the THD Action Tracker, as well as, coordinating with the THD Records Liaison Officer to document the receipt of the FOIA request.

## FEMA THD REPP Records Management Process

- III. Provides copies of the package to THD's Office of Chief Counsel (OCC) for review and triage.
- IV. Provides a recommendation to the THD Business Operations Branch Chief on the THD branches most appropriate to take the lead on responding to the FOIA.
- V. Assigns the FOIA package to the appropriate THD Branch Chief with a requested deadline for return.
- VI. Requests that the Branch Chief designate a staff point of contact to coordinate the effort in drafting an official response to the FOIA inquiry.
- VII. Prepares the official response, upon receipt of the FOIA draft response from the assigned THD Branch.
- VIII. Ensures that the official FOIA response is properly logged and processed through THD RLO, prior to final transmittal of the completed FOIA response back to the NPD Action Office.

### 4) Program Staff

- I. Document the mission and business activities of their THD Branches. This responsibility includes maintaining records created or received in the course of conducting official FEMA business.
- II. Coordinate with their THD Branch's RC to ensure that records are documented, and captured in the official THD recordkeeping system.
- III. Attend annual, mandatory records management training conducted by THD's RLO.
- IV. Turn in their records bi-monthly to their respective THD Branch RC.
- V. Ensure that requests for official records stored in THD File Room, are coordinated through their THD Branch RC for retrieval.

### 5) Contractors

- I. Must comply with applicable Federal records laws, regulations and policies as set forth by the Department of Homeland Security (DHS) and FEMA in managing the records they create or receive.
- II. Document the mission and business activities of their projects and deliverables. This responsibility includes maintaining records created or received in the course of performing assigned tasks in accordance with their contractor's Statement of Work (SOW) in conducting official FEMA business.
- III. Attend annual, mandatory records management training conducted by THD's RLO.

## X. Employee (or Contractor) Separation/Departure

Before personnel depart from THD, they shall consult with THD's Records Liaison Officer to ensure that official records that may be included in personal papers are returned to THD files. FEMA's Records Officer or General Counsel may approve a request from departing personnel to take extra copies of work-related files if the records do not contain national security-classified information or are otherwise restricted (e.g., Privacy Act, FOIA).

## **XI. Training Requirements for THD RLO**

### **1) Training**

- I. FEMA Basic Records Management Training
- II. NARA Records Management Training

### **2) FEMA Office of Records Management Appointment Certification**

- I. The RLO will maintain a FEMA RLO Designation form in the records.

## **XII. Forms and Resources**

This grid will be completed at a later date with the full process revision.

### **1) FEMA Records Disposition Schedule**

- I. This manual provides guidance for preserving records of FEMA, whether in textual or electronic form. This manual also provides guidance on ways to best establish and maintain uniform, economical, and efficient practices for records maintenance and disposition. It provides detailed procedures not only for planning, arranging, and maintaining files, but also for the disposition of records either by destruction or preservation for future use by historians.

### **2) FEMA Records Destruction/Disposal Form 181**

- I. TBD

### **3) Standard Form 135 (SF-135) Records Transmittal and Receipt**

- I. TBD

### **4) Optional Form 11 (OF-11) Reference Request for Federal Records Centers**

- I. TBD

### **5) Standard Form (SF-115) SF-115 Request for Records Disposition Authority**

- I. TBD

### **6) FEMA FORM 181-1-2-1- Inventory of Vital Records**

- I. TBD

## **XIII. Process Flow Map**



THD REPP Records  
Management SOP Prc