RECORDS AND INFORMATION MANAGEMENT SELF-EVALUATION GUIDE

NATIONAL ARCHIVES *AND* RECORDS ADMINISTRATION

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Introduction:

The National Archives and Records Administration (NARA) developed this self-evaluation guide for Federal agencies to use in reviewing the basic components of a records and information management program. This guide is provided to help agencies implement the requirement to conduct self-evaluations. This guide will assist agencies in making a preliminary assessment of the status of records and information management programs and in identifying major problems and setting priorities for program improvements. Other NARA publications provide additional details regarding records creation, maintenance, and disposition policies and procedures.

Although this guide provides a framework for general evaluation of a records and information management program, agencies that wish to conduct a more in-depth review may add more specific questions based on other NARA records and information management publications. Agencies may also modify or add questions to accommodate specialized records and recordkeeping practices. With the help of this guide records managers can develop an evaluation program tailored to the unique functions and operations of their agency.

When conducting an agency records and information management self-evaluation, agency staff should use 36 CFR Chapter VII, Subpart B to ensure that the agency's records management program is in compliance with the applicable sections of 36 CFR Chapter VII, Subpart B. There are several terms cited in the regulations that refer to evaluations; this guide uses the terms evaluations, inspections, self-assessments, self-inspections, program reviews, and audits to explain similar records management activities.

Terms such as Records Officer, Records Manager, Records Liaison, Records Custodian and program analyst, among other titles, are used throughout the Federal Government. The term Agency Records Officer is used in this guide, but the targeted audience is anyone with records management responsibility.

Section I: Program Management

An effective and efficient Records and Information Management (RIM) program requires senior management support; a clear definition of program objectives, responsibilities, and authorities; allocation of sufficient resources to administer the program; assignment of the program to an appropriate office within the agency's organizational structure; continuous training for records and information management staff; and regular internal evaluations to monitor compliance and program effectiveness. The benefits derived from such a program include improved efficiency through ready access to complete and accurate information, avoidance of unnecessary costs for records storage, protection of rights, and assurance of continuity of operations.

A. Program Requirements:

An effective implementation of RIM program requirements provides clearly defined program objectives, roles and responsibilities, and ensures the efficient and effective management of agency records and information.

Yes　　**No**

☐　　☐　　1. Is the RIM program included in the strategic goals and objectives of the agency?

☐　　☐　　2. Is the RIM program placed appropriately within the agency's organizational structure?

☐　　☐　　3. Is RIM responsibility assigned to a headquarters Agency Records Officer (ARO) with appropriate authority within the agency to coordinate and oversee implementation of the agency records management program?

☐　　☐　　4. Are RIM responsibilities assigned to a network of records liaison officers (RLOs) in program and field offices to ensure recordkeeping requirements and practices are incorporated into agency programs, processes, systems, and procedures?

☐　　☐　　5. Are RIM responsibilities included in the position descriptions and performance plans for RLOs?

☐ ☐ 6. Does the ARO routinely communicate with all RLOs?

☐ ☐ 7. Are all employees informed of the identity and role of the records officer and the records liaison officer serving their office?

☐ ☐ 8. Does agency staff with responsibility for RIM have core competencies consistent with their duties, and is this reflected in their position descriptions and performance plans?

☐ ☐ 9. Has authority and responsibility for managing records and information been clearly assigned throughout the agency, and has this authority been clearly communicated to all employees?

☐ ☐ 10. Does the agency provide adequate resources and budget for the RIM program for continued improvements to records management, including sufficient staff, training for staff, procurement of equipment, and other resources?

B. Program Guidance and Training:

An effective and efficient RIM program provides clearly identified policies, standards and procedures to agency staff in the form of RIM procedure manuals, management directives and memoranda, and Internet and Intranet web pages.

An effective agency training program provides substantive training for agency RIM program staff, and the training and guidance necessary for agency staff and contractors to effectively perform their records and information management activities.

Yes   No

☐ ☐ 1. Is the agency RIM policy, standards, and governance based upon legislative and regulatory requirements, professional standards, and best practices documented in an understandable and implementable manner?

☐ ☐ 2. Is RIM guidance received from oversight agencies such as NARA, tailored, when appropriate, to reflect the agency's specific procedures prior to dissemination to appropriate agency staff?

☐ ☐ 3. Does the agency have mechanisms in place to monitor and review compliance with RIM policy, standards, and governance?

☐ ☐ 4. Has the agency developed performance goals for its records management program and performance metrics to measure progress towards meeting those goals?

☐ ☐ 5. Does the agency have mechanisms to identify and analyze internal and external risks to the RIM program and mitigate the risks?

☐ ☐ 6. Does the agency have a communications framework for disseminating information about RIM policies, standards, and governance including policy and procedure manuals, management directives, memoranda, training bulletin boards, notices, Internet and Intranet web pages?

☐ ☐ 7. Has the agency records officer received the NARA Certificate of Federal Records Management Training?

☐ ☐ 8. Does agency staff with responsibility for RIM have the opportunity for on-going training, continuing education, and professional development consistent with their responsibilities?

☐ ☐ 9. Does your agency have regular recurring internal records management training, based on agency policies and directives, for employees performing records management activities?

☐ ☐ 10. Does your agency require that all senior and appointed officials, including those incoming and newly promoted, receive training on the importance of appropriately managing records under their immediate control?

☐   ☐   11. Does RIM program staff conduct exit briefings for departing employees and senior officials on the appropriate disposition of records under their immediate control?

C. Internal Evaluations:

An effective internal evaluation program provides an important mechanism for assessing agency RIM programs. It provides a means for monitoring policies, procedures, and RIM activities and ensures that deficiencies and recommendations for improvement are brought to the attention of management and are resolved within an appropriate timeframe.

Yes   No

☐   ☐   1. Does the agency have a program of evaluations/inspections/audits, conducted on an annual cycle or similar timetable, to ensure the records management program is efficient, effective, and compliant?

☐   ☐   2. Following evaluations/inspections/audits, is a written report prepared on the findings and recommendations and presented to senior management?

☐   ☐   3. Are recommendations following evaluations/inspections/audits acted upon, and are after-action plans put into effect and evaluated to ensure compliance?

Section II: Records and Information Management Requirements

An effective and efficient RIM program establishes recordkeeping requirements for records in all media. Records management requirements should specify the creation and maintenance of specific records to document agency operation and activities; ensure that all records are covered by a records schedule; protect records from removal or alienation; define records management responsibilities; and stipulate training activities. Adequate records management requirements ensure the documentation of agency operations and activities, facilitate action by agency officials and their successors, permit continuity and consistency in administration, allow for proper scrutiny by Congress and duly authorized agencies, and protect the rights of the Government and those affected by its actions.

A. Recordkeeping Requirements:

Effective recordkeeping requirements include clear guidance on how to determine what constitutes records, non-record materials, and personal files. Agencies should ensure "adequate and proper documentation" of their programs; establish recordkeeping requirements for their programs; issue policies and procedures for organizing, maintaining, and storing records; and safeguard records from damage and unauthorized access, destruction, or removal.

Yes   No

☐   ☐   1. Are agency recordkeeping requirements identified and built into agency business processes?

☐   ☐   2. Are agency records schedules and file plans reviewed annually?

☐   ☐   3. Are agency file plans reviewed and updated annually to reflect changes in the records schedule and organizational changes?

☐   ☐   4. Has the agency established standards and procedures for classifying, indexing, filing, and retrieving records and made them available to all employees?

☐ ☐ 5. Does agency staff properly distinguish between records, non-record materials, and personal files and how they must be managed?

☐ ☐ 6. Has the agency issued guidance on the records status of working files and drafts?

☐ ☐ 7. Has the agency issued guidance on personal files?

☐ ☐ 8. Is access to all records, regardless of media, limited to authorized staff?

☐ ☐ 9. Are cutoffs clearly defined and implemented for each records series?

☐ ☐ 10. Are permanent series of records identified and maintained separately from temporary records when appropriate?

☐ ☐ 11. Are employees responsible for classifying, indexing, filing, retrieving, and re-filing records familiar with agency procedures?

☐ ☐ 12. Has the agency established and implemented regulations or procedures for the storage of security classified, Privacy Act, and other restricted records?

☐ ☐ 13. Do agency contracts address Federal records created, received, and maintained by contractors?

☐ ☐ 14. Does the agency provide to contractors the regulations and procedures governing Federal records?

☐ ☐ 15. Are all agency records, including those in contractor custody, covered by a NARA-approved records schedule?

☐ ☐ 16. Are Federal records identified and separated from contractor records?

☐ ☐ 17. Does the agency prohibit the removal of records by employees and contractors?

☐ ☐ 18. Are the records being stored under the appropriate environmental conditions, and are they arranged in accordance with applicable filing and reference procedures?

☐ ☐ 19. Do the storage facilities for inactive records meet the NARA's requirements?

B. Records Scheduling Requirements:

An effective RIM program requires that each agency ensure that all records are covered by a NARA-approved records retention and disposition schedule so that records are retained as long as needed for business purposes; to meet legal and fiscal requirements; and to preserve records with permanent and enduring value. Agencies must also ensure that these records schedules are implemented and up to date reflecting the agency's functions, and that the records are disposed of in accordance with these NARA-approved schedules.

Yes   No

☐ ☐ 1. Does the agency maintain an accurate, NARA-approved schedule for all agency records?

☐ ☐ 2. Does the schedule cover records in all media and formats?

☐ ☐ 3. Does the agency have a policy and procedure in place for keeping track of changes that may affect a records schedule between scheduled reviews?

☐ ☐ 4. Are records inventories and file plans kept up to date?

☐ ☐ 5. Does the agency have any unscheduled records? Is a schedule being developed for these records? Are these records being retained until a schedule is developed?

☐ ☐   a. Is a schedule being developed for these records?

☐ ☐   b. Are these records being retained until a schedule is developed?

☐ ☐   6. Do agency directives and other policy issuances instruct staff to treat any unscheduled records as permanent until an appropriate disposition authority is obtained?

☐ ☐   7. Does agency staff have easy access to, and are they familiar with, the agency's records schedule?

C. Records Disposition Requirements:

Records schedules should contain a clear and complete description of records series that reflects the content and arrangement of the files. Schedules should contain clear and concise descriptions of electronic recordkeeping systems that reflect the purpose, content, sources of information, and outputs.

Disposition instructions should include identification of cutoff (file break), instructions for retiring appropriate records to agency storage facilities or other records storage facilities, transfer of all records proposed for permanent retention to the National Archives, and specific retention periods before final disposition of all records.

Yes   No

☐ ☐   1. Is there a current list of staff (records liaisons, file custodians, line staff, contractors, program managers) responsible for the activities related to the disposition of records?

☐ ☐   2. Has the agency issued a handbook, guidance, or a directive that contains records disposition policies and procedures as well as the NARA-approved agency

records schedule and the General Records Schedule, and disposition instructions for all non-record material?

☐ ☐ 3. Are these staff familiar with Federal regulations and NARA guidance covering the transfer and disposal of records including the agency's records schedules and the General Records Schedule?

☐ ☐ 4. Has the agency developed and implemented a training curriculum for all staff covering their responsibilities concerning the disposition of records under their immediate control?

☐ ☐ 5. Do disposition instructions (contained in the agency's records schedule or issued separately) for electronic records require the transfer to the National Archives of permanent electronic records as soon as they become inactive, or otherwise provide for pre-accessioning?

☐ ☐ 6. Are records disposition reviews periodically conducted to identify new records series and information systems that should be scheduled and to identify changes in recordkeeping practices that require records schedule revision?

☐ ☐ 7. Does the agency send inactive records to NARA's Federal Records Center, a NARA-approved agency records center, or commercial records storage facility?

☐ ☐ 8. Is the agency storing records under the appropriate storage conditions based on the retention period and media of the records?

☐ ☐ 9. Does the agency create documentation such as box lists to identify and locate files in offsite storage especially for permanent records?

D. Electronic Records Management Requirements:

An effective and efficient RIM program requires the appropriate management of electronic records. This includes the integration of records management functionalities and preservation

considerations into the design, development, enhancement, and implementation of electronic information systems.

Yes   **No**

☐   ☐   1. Has the agency incorporated electronic records management objectives, responsibilities, and authorities in pertinent agency directives and disseminated them throughout the agency?

☐   ☐   2. Has the agency integrated the management of electronic records with other agency records and information resources management programs?

☐   ☐   3. Does the agency have procedures in place for ensuring that records management requirements are addressed before approving new electronic information systems or enhancements to existing systems?

☐   ☐   4. Is adequate training provided to those who use electronic information systems in the operation, care, and handling of the equipment and software in order to minimize lost or altered information?

☐   ☐   5. Is adequate training on records and information management requirements, including the distinction between record and non-record material, provided to those who use electronic information systems?

☐   ☐   6. Does the agency maintain an inventory of electronic information systems, their location, applicable disposition authorities (or status as unscheduled), and media in which electronic records are maintained in order to facilitate the management and disposition of electronic records?

☐   ☐   7. Does the agency properly manage and maintain electronic records prior to transfer to NARA?

☐ ☐   a. If the media in which the records were created are becoming obsolete, has the agency migrated the electronic records to a newer media?

☐ ☐   b. If the agency is unable to perform either of these tasks, has it made arrangements with NARA for early transfer of the records?

☐ ☐   c. Does the agency create and maintain permanent electronic records NARA approved formats identified in NARA Bulletin 2014-04, *Revised Format Guidance for the Transfer of Permanent Electronic Record*?

☐ ☐ 8. Does the agency maintain computer magnetic media in a proper temperature of and humidity environment?

☐ ☐ 9. Does the agency perform an annual analysis of permanent or unscheduled records to prevent or correct data loss?

☐ ☐ 10. Has the agency developed policies and procedures for the use of shared drives that include permissions, access controls, and acceptable formats for filing records needed for long-term retention?

☐ ☐ 11. Does the record management staff work with Information Technology staff to ensure the integrity of the shared drive?

☐ ☐ 12. Are employees trained in the use of the shared drive and their responsibilities?

☐ ☐ 13. Does the agency instruct staff on how to manage email records and provide instructions for following retention and management requirements for email records?

☐ ☐ 14. Does the agency ensure that email messages including attachments that are Federal records are preserved in the appropriate agency recordkeeping system?

☐ ☐ 15. Is the agency transferring electronic records to NARA in accordance with the agency's disposition schedule and NARA's requirements?

☐ ☐ 16. Is the agency transferring permanent electronic records to NARA in accordance with NARA Bulletin 2014-04, *Revised Format Guidance for the Transfer of Permanent Electronic Records*?

☐ ☐ 17. Has the agency taken the steps required in NARA Bulleting 2014-04, *Revised Format Guidance for the Transfer of Permanent Electronic Records* in preparing permanent electronic records for transfer?

E. Electronic Records Management System Requirements:

Does the agency currently have a fully functioning Electronic Records Management System (ERMS)/Records Management Application (RMA) for maintaining and preserving electronic records? If yes:

Yes   No

☐ ☐ 1. Is each record assigned a unique identifier?

☐ ☐ 2. Are the records imported into the system from other sources, manually entered into the system, or linked to records in other systems?

☐ ☐ 3. Are the records associated with an approved records schedule and disposition instruction?

☐ ☐ 4. Are the records protected from unauthorized access, modification, or deletion?

☐ ☐ 5. Are audit trails employed to track use of the records?

☐ ☐   6. Are the appropriate permissions (rights) established for users to access the records and facilitate the search and retrieval of records?

☐ ☐   7. Are all records retrievable and usable as long as needed to conduct business and meet NARA-approved dispositions?

☐ ☐   8. Can permanent records be identified and transferred to NARA based on approved records schedules?

☐ ☐   9. Can temporary records be identified and deleted when eligible for disposal?

☐ ☐   10. Can a records hold or freeze on disposition be applied when required?

F. Audiovisual, Cartographic and Architectural Records Requirements:

An agency with an effective RIM program identifies and schedules information in all formats. The agency should identify the special preservation, storage, and transfer requirements for audiovisual and cartographic records. Records management staff should have the necessary knowledge and expertise to manage this particular subset of information throughout its lifecycle.

Yes   **No**

☐ ☐   1. Does the agency maintain and keep current an inventory of all generations of audiovisual and cartographic records and their locations?

☐ ☐   2. Do records management staff have the necessary core competencies in handling audiovisual and cartographic records, especially the preservation concerns involved for the specific formats and media in their custody?

☐ ☐   3. Has agency staff with responsibility for audiovisual and cartographic records scheduled for permanent transfer to NARA received training pertaining to the

specific formats and media and the specific record elements that must be created or acquired and preserved for transfer?

☐ ☐ 4. Has the agency created unique identifiers for all audiovisual and cartographic records and labeled them accordingly?

☐ ☐ 5. Have finding aids such as data sheets, shot lists, continuities, review sheets, catalogs, indexes, list of captions, and other relevant documentation been identified and labeled with references to related audiovisual records?

☐ ☐ 6. Does the agency maintain temporary and permanent audiovisual and cartographic records separately or are they appropriately identified?

☐ ☐ 7. Are audiovisual records, especially permanent or unscheduled audiovisual and cartographic records, stored in environmentally appropriate space and in containers or enclosures that meet preservation standards?

☐ ☐ 8. Are audiovisual and cartographic records, including posters and similar graphic works in oversize formats, stored in map cases, hanging files, or other enclosures that are sufficiently large or flexible to accommodate the records without rolling, folding, bending, or other ways that compromise image integrity and stability?

☐ ☐ 9. Are identification schemes including lists and indexes maintained for each cartographic, architectural, and engineering series?

☐ ☐ 10. Are permanent maps and drawings stored flat in shallow drawer map cases in acid-free folders?

☐ ☐ 11. Does the agency store permanent audiovisual records, particularly color films and photographs, in environmentally controlled space?

☐ ☐ 12. Is the agency transferring permanent audiovisual and cartographic records to NARA in accordance with NARA guidance?

G. Vital Records Requirements:

An effective agency vital records (essential records) management program identifies and protects records essential for continuing operations under abnormal business conditions, resuming business once conditions have normalized, and protecting the legal and financial rights of the government and citizens.

Yes   No

☐ ☐ 1. Does the agency have vital records policies and procedures?

☐ ☐ 2. Are vital records requirements incorporated into the agency's continuity-of-operations (COOP) plan (refer to Federal Continuity Directive 1 (FDC1) for additional guidance)?

☐ ☐ 3. Has the agency identified all of its vital records in all program and administrative offices?

☐ ☐ 4. Does the agency maintain and keep current an inventory of all vital records and their locations?

☐ ☐ 5. Are vital records requirements incorporated into the agency records management directive?

☐ ☐ 6. Have vital records strategies, including the use of records formats that do not require specialized equipment, or remote access and offsite storage of backups and duplicates, been designed and implemented?

☐ ☐ 7. Are vital records strategies tested on a regular (at least annual) basis?

☐   ☐   8. Are vital records included in regular testing of the agency's emergency management procedures?

☐   ☐   9. Has all staff with vital records responsibilities received formal training in these duties?

National Archives and Records Administration