

Summary of Changes
to
Procedure 200.2-1
Electronic Recordkeeping Systems (ERKS) and Electronic Information Systems (EIS)

Revised Version Issued as P200.2-1B

LM Procedure 200.2-1, Electronic Recordkeeping Systems (ERKS) and Electronic Information Systems (EIS) of 4/16/07, has undergone minor revisions. The procedure has been revised to reflect changes in definitions, document control guidance, and formatting. Please replace LM Procedure 200.2-1A with LM Procedure 200.2-1B.

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U.S. Department of Energy Office of Legacy Management



Procedure: 200.2-1B

Effective: 6/18/08

SUBJECT: ELECTRONIC RECORDKEEPING SYSTEMS (ERKS) AND ELECTRONIC INFORMATION SYSTEMS (EIS)

1. PURPOSE.

To provide Legacy Management (LM) personnel with instructions for identifying, maintaining, preserving, and dispositioning each LM ERKS and EIS according to U.S. Department of Energy (DOE) requirements.

2. CANCELLATION. LM Procedure 200.2-1, Electronic Recordkeeping Systems (ERKS) and Electronic Information Systems (EIS), dated 4/16/07

3. REFERENCES.

- a. 44 *United States Code (U.S.C.)* 29–35, Records Management
- b. 44 *U.S.C.* 36, E-Government Act of 2002
- c. 36 *Code of Federal Regulations* Chapter XII, Subchapter B, Records Management
- d. DOE Order 243.1, Records Management Program
- e. LM Procedure 200.1-1, File Plan
- f. LM Procedure 200.2, Electronic Records
- g. LM Procedure 200.4, Records Management
- h. Department of Defense (DoD) Electronic Records Management Software Application Design Criteria Standard (DoD 5015.2-STD, June 2002)

- i. National Archives and Records Administration (NARA) Bulletin 2006-02, NARA Guidance for Implementing Section 207(e) of the E-Government Act of 2002, December 2005
- j. NARA E-Government Electronic Records Management Initiative – Recommended Practice: Evaluating Commercial Off-the-Shelf (COTS) Electronic Records Management (ERM) Applications, November 2005

4. DEFINITIONS.

- a. Electronic Information System (EIS) -- A system (spreadsheet, tracking database, etc.) designed to automate business functions and which may include Federal records. An EIS may or may not incorporate all aspects of appropriate electronic recordkeeping, depending on its design characteristics.
- b. Electronic Record -- Any information that is recorded in a form that only a computer can process and that satisfies the definition of a record. See Records definition below.
- c. Electronic Recordkeeping System (ERKS) -- An EIS in which records are collected, organized, and categorized to facilitate their preservation, retrieval, use, and disposition. An ERKS is certified according to DoD 5015.2-STD to ensure the records it maintains have sufficient authenticity and reliability to meet the agency's recordkeeping requirements.
- d. Enterprise Management Representative (EMR) -- Information technology representative who works with the Records Liaison Officer (RLO) to review each EIS to determine whether it should be categorized as an ERKS. The EMR also ensures that each ERKS is properly maintained and dispositioned.
- e. Information Management Data Entry Representative -- LM representative who ensures information about each EIS and ERKS is properly maintained in the Hummingbird Records Management Database.
- f. Manager of Data Processing Operations -- LM representative responsible for compiling and maintaining information about each ERKS and EIS maintained by LM.
- g. National Archives and Records Administration (NARA) -- An independent Federal agency that provides guidance to Federal agencies on the management of records, determines the retention and disposition of records, stores agency records in records centers from which agencies can retrieve them, and preserves permanently valuable Federal records.
- h. Nonrecord Materials -- U.S. Government-owned informational materials excluded from the legal definition of records or not meeting the requirements of that

definition. Includes extra copies of documents kept only for convenience of reference, stocks of publications and of processed documents, and library or museum materials intended solely for reference or exhibition.

- i. Program Records Official (PRO) -- Individual who ensures that all LM records management practices are properly executed.
- j. Records -- 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 U.S. Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations or other activities of the Government or because of the informational value of data in them.
- k. Records Liaison Officer (RLO) -- Individual(s) designated by the PRO to oversee the LM records management program in cooperation with the DOE Records Officer.
- l. Records Management Database -- LM tool for organizing information about each ERKS and EIS maintained by LM.
- m. System Owner -- Designated Information Technology contact who maintain an EIS or is the custodian over information maintained in an LM system. The System Owner works with the EMR and RLO to ensure that information in LM systems is maintained and dispositioned according to applicable laws, regulations, and DOE requirements.

5. QUALITY CONTROL.

- a. Systems used to store electronic records must meet the requirements set forth in DOD 5015.2-STD.
- b. The RLO ensures that each ERKS and EIS is inventoried annually.
- c. The RLO reviews this procedure annually and as necessary to accommodate changing conditions within LM and to ensure compliance with applicable laws, regulations, and DOE requirements.

6. RESPONSIBILITIES.

- a. LM Office Directors support records management electronic recordkeeping requirements and are responsible for the implementation of this procedure and for adherence to the requirements in this procedure by each organizational unit.

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- b. The PRO, Team Leader of Archives and Information Management (AIM), is responsible for ensuring that each ERKS and EIS adheres to the electronic recordkeeping requirements in this procedure.
- c. The EMR and RLO are responsible for:
 - Evaluating each new or existing EIS and working with the System Owner to determine whether the system meets the requirements of an ERKS and whether it should be registered and maintained as an ERKS.
 - Ensuring that provisions are made to protect records in systems that do not meet the requirements of an ERKS.
 - Ensuring that ERKS and EIS inventories are conducted annually.
- d. The EMR is additionally responsible for reviewing and implementing decisions to retire an ERKS that is no longer needed.
- e. The RLO is responsible for ensuring that records management issues pertaining to retired systems are addressed.
- f. The System Owner is responsible for generating an Electronic System Registration/Inventory form (LM Form 200.1-5) for each system and working with the RLO and EMR to clarify any information needed to designate the system as either an EIS or an ERKS.
- g. The Information Management Data Entry Representative is responsible for ensuring that information concerning each electronic system is entered in the Hummingbird Records Management Database.

7. TRAINING REQUIREMENTS.

Personnel with responsibilities for an EIS or ERKS should be cognizant of the applicable requirements and processes within this procedure.

8. DOCUMENT CONTROL.

- a. Each registered electronic system is maintained and tracked in the Records Management Database and overseen by the EMR.
- b. The Directives Manager shall maintain the official controlled version of this document in the Records Management Database.
- c. The Directives Manager shall place the most current version of this procedure on the LM Intranet for employee use.

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d. Printed hard copies of this document shall be considered information-only copies.

9. PROCEDURE.

Attachment A. illustrates the process of registering, inventorying, and retiring an ERKS.

a. System Identification

(1) The System Owner:

- (a) Determines that a computer system meets the definition of an EIS. A system is:
- Identified during an initial or annual inventory of electronic systems,
 - Identified as it is being developed by LM personnel, or
 - Transferred to LM control from a closure site.

NOTE: No further processing is required for systems not meeting the definition of an EIS.

- (b) Completes the System Information portion of LM Form 200.1-5, Electronic System Registration/Inventory. The System Information portion of the form includes questions concerning the system's recordkeeping capabilities, the categories of information stored, and various elements that are evaluated later in determining whether a system is an ERKS. The form is available on the LM Intranet.
- (c) Routes the form to the EMR and RLO.

(2) The EMR and RLO:

- (a) Receive the Electronic System Registration/Inventory form from the System Owner with the System Information portion completed.
- (b) Determine whether the system meets the requirements for an ERKS according to the DOD 5015.2-STD (see Attachment B. – Electronic System Requirements). The determination can be:
- The system meets ERKS requirements and can be designated as an ERKS.

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- The system does not meet all the requirements for an ERKS. The EMR and RLO work with the System Owner to ensure the system is modified to meet the requirements or to transfer any record information to an appropriate ERKS.
- The system is not an ERKS.

(c) Complete the Registration portion of the Electronic System Registration/Inventory form.

(3) The RLO:

(a) Determines retention and disposition of records maintained in a system identified as an ERKS. (A retention and disposition determination is not required for an EIS not categorized as an ERKS.)

(b) Forwards the Electronic System Registration/Inventory form and any relevant guidance concerning system records retention and disposition to the Information Management Data Entry Representative.

(4) The Information Management Data Entry Representative:

(a) Completes the Electronic System Registration/Inventory form.

(b) Scans the completed form and imports the document into the Hummingbird Records Management Database, noting in the document profile any retention information supplied by the RLO.

b. System Inventory

The EMR and RLO conduct annual inventories of each ERKS and EIS to determine its status.

(1) The EMR and RLO notify System Owners of the annual inventory, instructing them to submit a new Electronic System Registration/Inventory form for each system they maintain.

(2) Each System Owner:

(a) Reviews the existing Electronic System Registration/Inventory form for each system they maintain.

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- (b) Prepares a new form for each system, completing the System Information section. The System Owner selects the Inventory check box.
- (c) Provides system information to reflect the system's current status and confirms that the system remains active. (If the system is no longer needed, go to section 9.c., System Retirement.)
- (d) Forwards the Electronic System Registration/Inventory forms to the EMR and RLO.

(3) The EMR and RLO:

- (a) Review each form, working with the System Owner to revise the form as necessary.
- (b) Complete the Registration section of the form.
- (c) Forward the form to the Information Management Data Entry Representative once inventory activities are completed.

(4) The Information Management Data Entry Representative:

- (a) Completes the Electronic System Registration/Inventory form.
- (b) Scans the completed form and imports the document into the Hummingbird Records Management Database, noting in the document profile any retention information supplied by the RLO.

c. System Retirement

(1) The EMR:

- (a) Initiates LM Form 200.1-4, Electronic Recordkeeping System Retirement, for any system no longer needed based on the determination made by the System Owner during the annual inventory.
- (b) Ensures system retirement actions are completed, and notes completion on the retirement form.
- (c) Forwards the retirement form to the RLO.

- (2) The RLO:
 - (a) Ensures records management issues pertaining to the system retirement are addressed and that any records have been dispositioned in accordance with the approved retention schedules.
 - (b) Completes the RLO portion of the Electronic Recordkeeping System Retirement form and forwards the form to the Information Management Data Entry Representative.
- (3) The Information Management Data Entry Representative:
 - (a) Completes the Electronic Recordkeeping System Retirement form.
 - (b) Scans the completed form and imports the document into the Hummingbird Records Management Database, noting in the document profile that the system has been retired and any records have been dispositioned according to the LM File Plan.

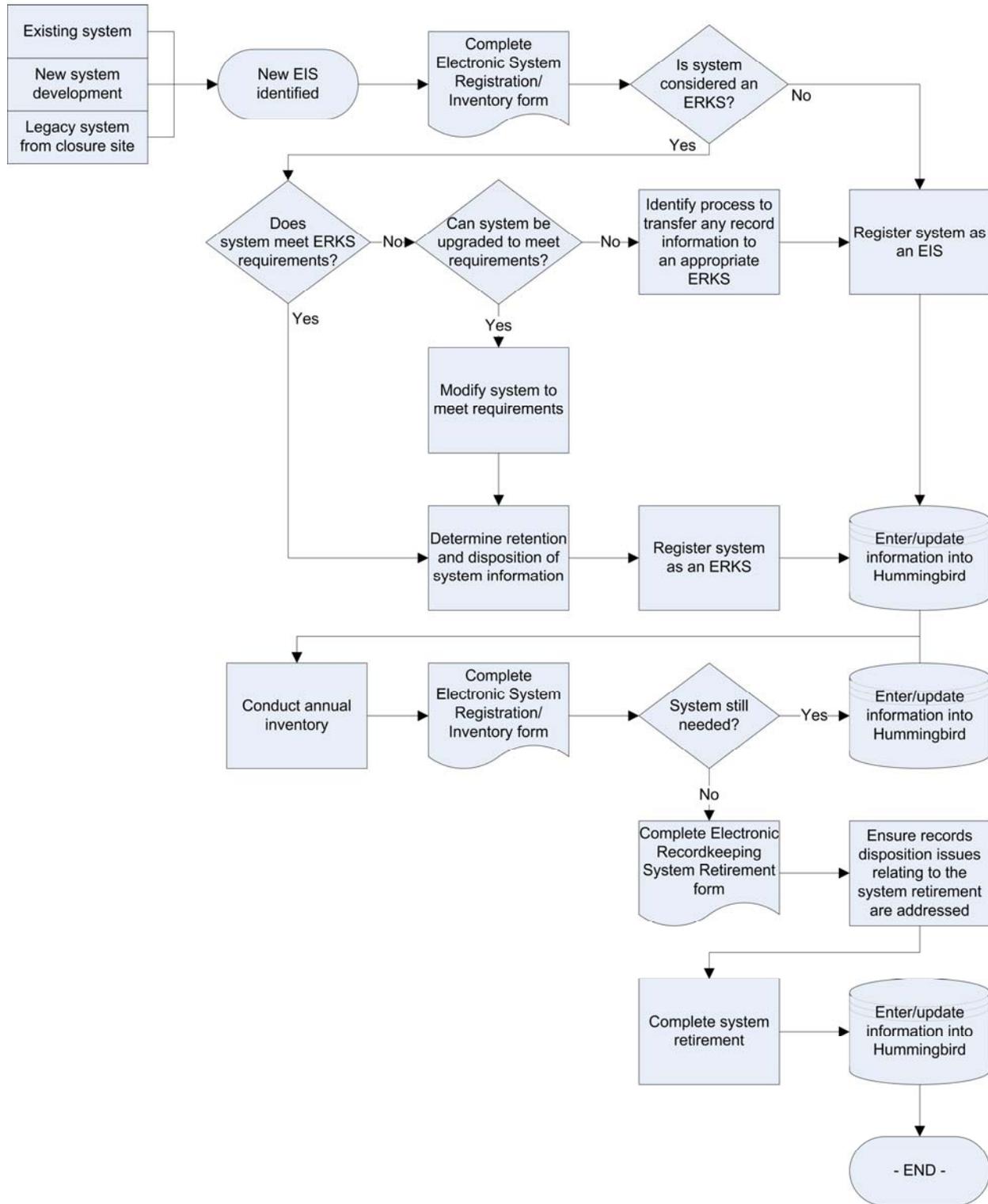
10. ATTACHMENTS.

- a. Attachment A. – Electronic System Registration/Inventory Flowchart
- b. Attachment B. – Electronic System Requirements

Approved: Original signed by Celinda H. Crawford, 6/18/08
Director
Office of Business and Operations

Distribution: As required

Attachment A. – Electronic System Registration/Inventory Flowchart



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Attachment B. – Electronic System Requirements

a. Electronic Information System (EIS) Requirements

- (1) System Owners must register each EIS with Archives and Information Management (AIM) to determine whether the system meets the criteria of an electronic recordkeeping system (ERKS).
- (2) Each EIS created must meet the following records management-related requirements:
 - (a) System Inventory – Each EIS is required to be registered with AIM, which maintains an electronic system inventory and ensures proper maintenance and archiving of electronic records. The status of registered systems is updated annually.
 - (b) Technical Documentation – System Owners must maintain adequate and current technical documentation on each EIS. This documentation includes:
 - A narrative description of the system, including purpose and scope;
 - Physical and technical characteristics including, but not limited to, a data dictionary or the equivalent information associated with a database management system with a description of the relationships between data elements in databases;
 - File codes and keywords; and
 - Other technical information needed to read or process data in the system.

Technical documentation must accompany the system and data as separately scheduled records upon turnover to the National Archives and Records Administration (NARA).

b. ERKS Requirements

Each ERKS must meet the requirements listed above for an EIS. In addition, System Owners shall provide the Records Liaison Officer (RLO) with documentation that the following recordkeeping elements are properly addressed for any system being considered as an ERKS:

- Record Retrieval – A method is provided for authorized users to retrieve desired records.

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- Segregation of Information – The system facilitates distinction between and separation of records and non-record information.
- Security and Data Integrity – Appropriate security is provided to ensure that only authorized users have access to the records and to guarantee the integrity of the records.
- Authentication – A method of authenticating record information is provided.
- Interchange Format – A standard interchange format is provided when necessary to permit the exchange of records on electronic media between computers using different software/operating systems and the conversion or migration of records on electronic media from one system to another.
- Configuration to Support Disposition – Disposition actions and requirements are provided as necessary for transferring permanent records to NARA.
- Media Selection – Identification is included on each storage medium on which records are stored. That identification remains throughout the lifecycle and the maximum time span of the records.
- Data Protection – The system demonstrates adequate protection of records in the case of power interruptions and minimizes the risk of unauthorized additions, deletions, or alterations.

LM Form 200.1-5, Electronic System Registration/Inventory includes the elements in this section. The Enterprise Management Representative (EMR) and the RLO evaluate information included on this form to determine whether a system should be categorized as an EIS or an ERKS.

c. Additional Requirements

- (1) Each ERKS must have processes incorporated into its design to ensure record information is properly maintained. If not, manual processes must be in place to retain essential information produced by the system. This requirement ensures that EIS records have the essential characteristics of authenticity, integrity, and usability required for the records to be considered trustworthy.
- (2) Technical documentation of the EIS design and operating procedures is required when an electronic record is submitted to NARA. This documentation is scheduled separately.

- (3) In some cases, records originating from an electronic system exist only in electronic form because there is no requirement to produce a hard copy. If there is a high risk of data becoming unreadable because of the imminent end of the service life of the device or technology associated with it, the native data should be converted to a form that will maintain the records' usability.

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