

Summary of Changes
to
Procedure 200.2
Electronic Records Procedure

Revised Version Issued as P 200.2B

LM Procedure 200.2A, Electronic Records Procedure of 1/19/07, has undergone revisions. The procedure has been revised to reflect changes in definitions and formatting and to reflect LM's continued emphasis on the use of an electronic recordkeeping system. Please replace LM Procedure 200.2A with LM Procedure 200.2B.

The most recent and official controlled hard copy version of this document resides with LM's Directives Coordinator.
An electronic version of the controlled document has been placed on the LM Intranet for employee use. Printed
hard copies of this electronic version are considered uncontrolled documents.

U.S. Department of Energy Office of Legacy Management



Procedure: 200.2B

Effective: 2/11/08

SUBJECT: ELECTRONIC RECORDS

1. PURPOSE.

To ensure that electronic records are managed according to Federal requirements and U.S. Department of Energy (DOE) directives.

2. CANCELLATION. Procedure 200.2A, Electronic Records, dated 1/19/07

3. REFERENCES.

- a. 5 United States Code (U.S.C.) 552, The Freedom of Information Act (FOIA)
- b. 18 U.S.C. 2511, The Electronic Communications Privacy Act
- c. 44 U.S.C. 29, Records Management
- d. 44 U.S.C. 35, Paperwork Reduction Act
- e. 44 U.S.C. 36, E-Government Act of 2002
- f. 36 Code of Federal Regulations (CFR), Chapter 12, Subchapter B, Records Management
- g. DOE Guide 1324.5B, Implementation Guide for Use with 36 CFR Chapter XII – Subchapter B Records Management
- h. DOE Order 200.1, Information Management Program
- i. DOE Order 243.1, Records Management Program
- j. DOE Order 243.2, Vital Records

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- k. Legacy Management (LM) Procedure 200.4, Records Management
- l. National Archives and Records Administration (NARA) Guidance on Managing Web Records
- m. Department of Defense 5015.02-STD, Electronic Records Management Software Applications Design Criteria Standard
- n. NARA Expanding Acceptable Transfer Requirements: Transfer Instructions for Permanent Electronic Records for Portable Document Format
- o. Office of Management and Budget Circular A-130, Management of Federal Information Resources

4. DEFINITIONS.

- a. Authentication -- Confirming information contained within a document is accurate, complete, and appropriate. Authentication ensures that the record does not result from manipulation, substitution, or falsification occurring after it was made or received (i.e., the record is what it purports to be, free from tampering or corruption). Authentication is synonymous with Validation.
- b. Document Format -- A standardized structure that associates a data file with a particular application, such as Microsoft Word or Adobe Acrobat. Each file format has its own headers, codes, and rules for rendering, manipulating, and storing content.
- c. Document Profile -- A metadata set used to identify and locate documents housed in an electronic recordkeeping system (ERKS). The profile also may be used to designate which documents constitute vital records. See metadata.
- d. Documentary Materials -- A collective term for records and nonrecord materials that refers to all media on which information is recorded, regardless of the nature of the medium or the method of the recording.
- e. Electronic Copy -- The action or result of reading data electronically from a source, leaving the source data unchanged, and writing the same data elsewhere on a medium that may differ from the source. Multiple copies of important data files may be maintained to protect against loss or file corruption.
- f. Electronic Information System (EIS) -- A system that contains and provides access to computerized information, which may include Federal records. An EIS may include a spreadsheet, a tracking system, or other function designed to automate business functions. An EIS may or may not incorporate all aspects of appropriate electronic recordkeeping, depending on its design characteristics.

- g. Electronic Mail (E-mail) -- A document created or received on an electronic mail system including brief notes, more formal or substantive narrative documents, and any attachments which may be transmitted with the message. To meet Federal regulations, enhance retrieval, and ensure records can be understood in their proper context, the following metadata must be captured for each e-mail record: name and e-mail address of the sender and addressees; date and time the message was sent; message subject; and date and time the message was received if the e-mail system offers that capability.
- h. Electronic Record -- Any information that is recorded in a form that only a computer can process and that satisfies the definition of a Federal record in 44 U.S.C. 3301.
- i. Electronic Recordkeeping System (ERKS) -- An electronic information system in which records are collected, organized, and categorized to facilitate their preservation, retrieval, use, and disposition. An ERKS ensures that the records it maintains will have sufficient authenticity and reliability to meet the agency's recordkeeping requirements. These requirements are based in statute, ensuring "adequate and proper documentation," which contributes to efficient and economical agency operations.
- j. File Plan -- Plan that identifies the specific types of records maintained, organizational elements that have custodial responsibility for them, series descriptions, and disposition authorities (e.g., a records inventory and disposition system or other systems used to identify, locate, and retrieve records). LM File Plan is a collective term that refers to both the LM Administrative File Plan and LM site-specific file plans.
- k. Information Technology (IT) Point of Contact (POC) -- Designated representative who assists LM personnel with technical issues relating to use of the LM ERKS.
- l. LM Personnel -- Federal employees and contractor personnel associated with LM.
- m. Metadata -- Data describing the structure, content, context, and other characteristics of electronic records. Metadata is maintained in document profiles.
- n. 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.
- o. Personally Identifiable Information (PII) -- Any information about an individual maintained by an agency, including but not limited to, education, financial transactions, medical history, and criminal or employment history and

information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual.

- p. Portable Document Format (PDF) -- A format created by Adobe Systems based on its PostScript page description language. PDF files are created and supported using Adobe's Acrobat software tools. PDF records must have all security settings disabled and must be created using legally embedded fonts. NARA requires PDF records intended for long-term preservation be created using the PDF/A, or archival quality, standard. PDF/A standards are defined in ISO 19005-1.
- q. Program Records Official (PRO) -- The individual ensuring all records management practices are properly executed.
- r. Public Folders -- Areas within the LM ERKS designated for storage and sharing of nonrecord electronic documents used by LM personnel.
- s. 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 data in them.
- t. Records Coordinators -- Personnel who work with the Records Liaison Officer to provide support for LM records management activities.
- u. Records Liaison Officer (RLO) -- Individual(s), designated by the PRO to oversee the LM records management program in cooperation with the DOE Records Officer.
- v. Retention Schedule -- A timetable identifying how long a record must be retained in active and inactive status before final disposition. A retention schedule also may indicate the organization that has responsibility as official custodian, the media it is recorded on, and the file station where it is stored.
- w. Unclassified Controlled Information (UCI) -- Unclassified information that may be exempt from public release under FOIA and for which disclosure, loss, misuse, alteration, or destruction may adversely affect national security, Governmental interests, or personal privacy.

- x. Validation -- The process by which a message/record is confirmed to have originated from an authenticated network user, that is, one who has appropriately established his or her identity on the network. See also Authentication.
- y. Vital Records -- Records essential to the continued functioning or reconstitution of an organization during and after an emergency, including those records essential to protecting the rights and interests of that organization and of the individuals directly affected by its activities. Vital records considerations are part of DOE's Emergency Management Program.

5. QUALITY CONTROL.

The RLO shall:

- a. Review this procedure annually and as necessary to accommodate changing conditions within LM and to ensure compliance with applicable laws, regulations, and DOE requirements.
- b. Annually inspect the readability of a randomly selected portion of records stored in the LM ERKS to verify its continued readability throughout its retention period.

6. RESPONSIBILITIES.

- a. The PRO, the Team Leader of Archives and Information Management (AIM), is responsible for ensuring personnel are appropriately informed about electronic records management and their responsibilities concerning creation, identification, capture, maintenance, use, and disposition.
- b. The RLO is responsible for:
 - (1) Ensuring electronic records are created or received, identified, preserved, and dispositioned as specified in this procedure.
 - (2) Assisting any LM staff member or contractor organization with the management of its electronic records.
 - (3) Ensuring this procedure and associated documentation comply with current Federal law and regulations, and ensuring the procedure is utilized and kept current.
 - (4) Coordinating with the IT POC to ensure adequate records and IT training is provided for users of e-mail systems and the LM ERKS.

- (5) Coordinating with the IT POC to assess the need to migrate any electronic records in the LM ERKS to a newer file format to ensure records remain readable for their entire retention period.

c. The IT POC is responsible for:

- (1) Developing and maintaining adequate, current documentation pertaining to the LM ERKS according to 36 CFR 1234.10(g).
- (2) Integrating electronic records with other LM records and information resources.
- (3) Implementing security controls for PII and UCI stored and used electronically to ensure it is accessible only by authorized personnel in performance of DOE authorized work.
- (4) Ensuring migration of identified electronic records so that records are retained in a readable format for the life of the record.
- (5) Providing recovery, rollback, and rebuild processes so records may be recovered or restored following system malfunctions.
- (6) Ensuring compliance with DOE Office of Chief Information Officer requirements for electronic systems management, including compliance with E-Government initiatives.

d. The Records Coordinators are responsible for:

- (1) Providing guidance on electronic records to their organizations and acting as liaisons between their organizations and AIM RLOs.
- (2) Ensuring electronic records for their assigned organization or department are processed and dispositioned in the LM ERKS.

e. LM personnel are responsible for:

- (1) Familiarizing themselves with the concept and practice of distinguishing between electronic record and non-record material.
- (2) Ensuring electronic records created or received are provided to the Records Coordinators for filing in the LM ERKS in a timely manner.
- (3) Using LM ERKS public folders to store nonrecord documents having corporate value.

7. TRAINING REQUIREMENTS.

- a. LM personnel complete Federal recordkeeping training annually.
- b. Additional training requirements will be promoted through web-based training, newsletter articles, information posted to the LM Intranet, and hands-on experience.

8. DOCUMENT CONTROL.

- a. The Directives Manager shall maintain the official controlled version of this document in the LM ERKS.
- b. The Directives Manager shall place the most current version of this procedure on the LM Intranet for employee use.
- c. Printed hard copies of this document shall be considered information-only copies.

9. PROCEDURE.

This procedure provides general instructions for management of LM's electronic records and provides specific guidance concerning the use of the LM ERKS to capture and retrieve electronic records. The procedural steps are illustrated in Attachment A. – Electronic Records Management Flowchart.

This procedure includes aspects of DOE electronic records management requirements, which are discussed further in Attachment B. – Federal Requirements for Electronic Records. Detailed records management guidance concerning electronic information systems, electronic mail, audiovisual records, web-related records, and vital records are addressed in separate LM directives.

a. Document Creation

LM personnel create or receive electronic documentary materials, naming the files as follows:

- (1) Use descriptive file names that clearly identify the subject and version of the information content of electronic documents. (For the example “RM weekly report 01-28-07.pdf,” the name helps readers quickly discern the file contents and version).
- (2) Use default file extensions, when available, to identify the application used to produce electronic files (e.g., .doc – Microsoft Word, .xls – Microsoft Excel, .ppt – Microsoft PowerPoint, .pdf – Adobe Acrobat, .jpg, .tif – image files).

- (3) Ensure that received electronic documents are similarly labeled with descriptive file names and proper extensions.

b. Identification and Capture of Record Material

The LM Portal includes documents to assist LM ERKS users. The documents are housed in the portal's "Records Management" area under the "Hummingbird DM/RM Help Documents" and Hummingbird "Quick Reference" headings.

(1) LM personnel:

- (a) Review each electronic document created or received to determine whether it is record or nonrecord material. Attachment C. provides additional information to help determine if a document is a record.
 - Make a determination of record, if the material documents LM's mission or if the material provides evidence of an LM business transaction.
 - Make a determination of a nonrecord, if the material does not meet the definition of a record.
- (b) Maintain nonrecord electronic material and personal documents separately from record material. LM personnel may maintain nonrecord electronic documents on a local drive or send them to a Records Coordinator to have them placed in an LM ERKS public folder.
- (c) E-mail electronic documents identified as records to a Records Coordinator using the appropriate address for that location:
 - rc-mound@lm.doe.gov
 - rc-fernald@lm.doe.gov
 - rc-morgantown@lm.doe.gov
 - rc-washington@lm.doe.gov
 - rc-grand.junction@lm.doe.gov
 - rc-rocky.flats@lm.doe.gov
 - rc-nevada@lm.doe.gov

Personnel-related and sensitive documents are sent to a dedicated human resources address (rc-hr@lm.doe.gov).

The record submittal e-mail should include:

1. The electronic document in its native format (e.g., .doc for Microsoft Word documents, .xls for Microsoft Excel spreadsheets);

2. A brief description or necessary metadata to provide context for the information; and
3. A proposed LM File Plan code for the document. The current version of the LM File Plan is available on the LM Intranet under the Records Management tab.

(2) The Records Coordinator:

- (a) Converts each document received in the “rc” mailbox to an archival quality PDF file. Any related attachments or signature pages received are merged into the PDF file.
- (b) Saves the PDF to the LM ERKS, using the appropriate file code and entering necessary metadata to complete the record profile. The Records Coordinator consults with the RLO if it appears that a new file code is needed to accommodate the record.
- (c) Notifies the LM personnel who submitted the record when it is entered and available in the LM ERKS. In the notification e-mail, the Records Coordinator confirms the file code assigned to the record.

c. Maintenance and Use

- (1) The IT POC ensures system security is properly set and maintained for the LM ERKS:
 - (a) To ensure each record’s authenticity, reliability, and trustworthiness;
 - (b) To limit access to each document to only LM personnel performing DOE authorized work; and
 - (c) To protect PII and UCI from unauthorized access or dissemination.
- (2) LM personnel retrieve records in the ERKS by searching document profiles or using full-text search as appropriate.
- (3) The RLO periodically reviews records in the ERKS to ensure readability is maintained.

d. Disposition

Records Coordinators:

- (1) Disposition all electronic records in the ERKS according to the applicable LM File Plan.
- (2) Delete nonrecord data files when no longer needed as requested by LM personnel.

10. ATTACHMENTS.

- a. Attachment A. – Electronic Records Management Flowchart
- b. Attachment B. – Federal Requirements for Electronic Records
- c. Attachment C. – Criteria to Determine if a Document is a Record

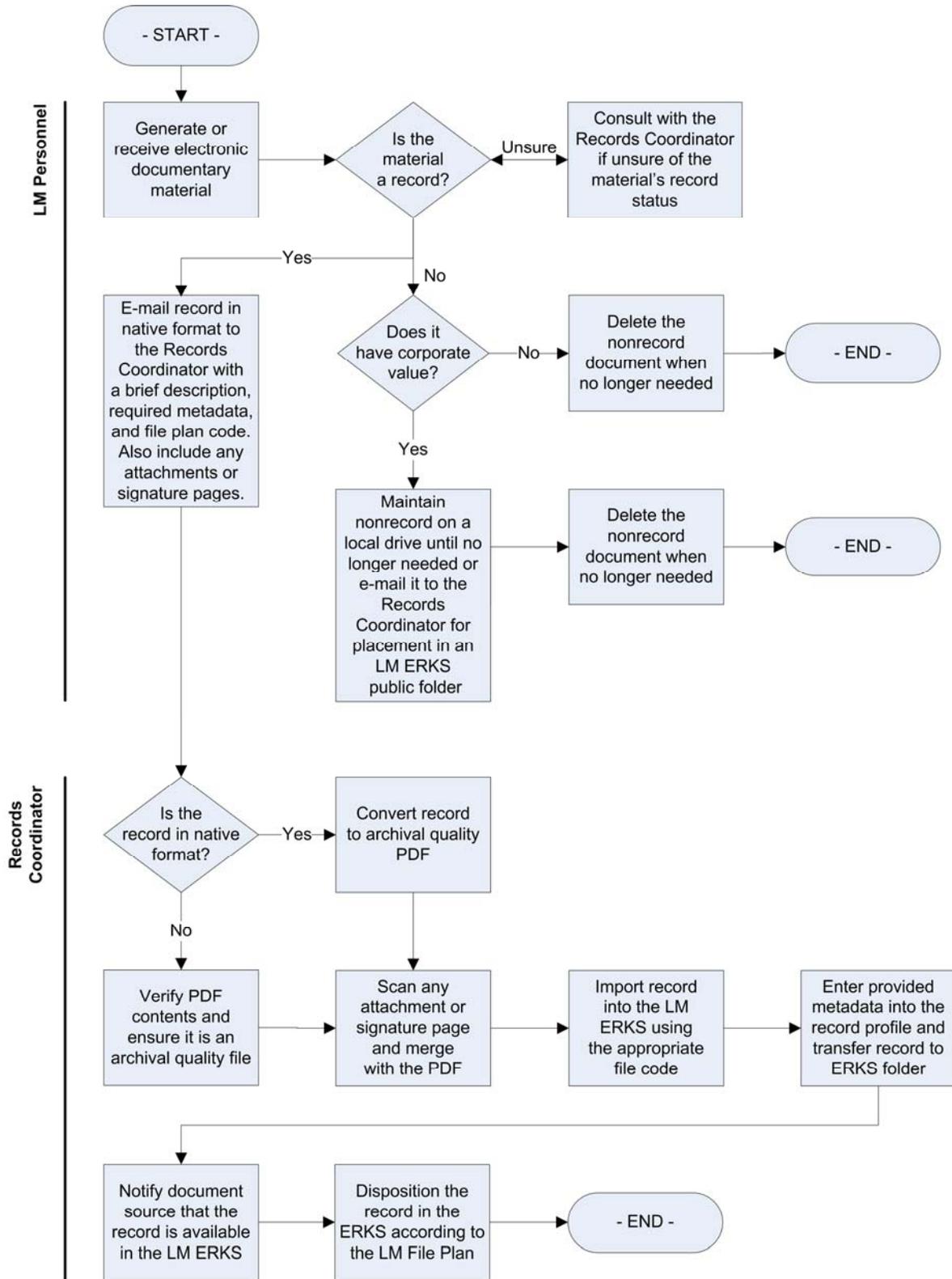
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Approved: Original signed by Celinda H. Crawford
Director
Office of Business Operations

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Attachment A. – Electronic Records Management Flowchart

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Attachment B. – Federal Requirements for Electronic Records

a. General Requirements for Electronic Records

- (1) Authentication – Records management personnel must ensure electronic records’ trustworthiness (i.e., the record is legible, complete, and an accurate representation of work performed).

Authentication is accomplished by one of several acceptable methods, such as passwords, biometric identification, or digital signature. Public key cryptography, used to implement digital signatures, is one of the principal electronic signature technologies agencies use when conducting business electronically.

- (2) Security – Electronic records must have controls in place to prevent unauthorized access, overwriting, or modification; track retrieval, modification, or deletion; prevent deletion of record identifiers, indexes, or other “pointers”; retain the record in usable format; provide adequate recovery following a system or storage media malfunction; and maintain the integrity of redacted records.

- (3) Portable Electronic Media

- Use recently manufactured magnetic and optical media for long-term storage of electronic records. Use high-quality media that conform to specifications from standard-setting organizations such as the American National Standards Institute (ANSI).
- Create two or more storage copies of important electronic files. Using media from different manufacturers for extra copies provides greater protection against defective media.
- Maintain environmental standards for storage media that will optimize media longevity. High temperatures and high relative humidity accelerate media deterioration. ANSI has published acceptable temperature and humidity ranges for storage media.
- Handle media only on the disc edges, never apply pressure, and store discs in protective covers. Regularly clean dust from areas where media are stored. Do not store near coffee makers, radiators, direct sunlight, or other sources of heat or magnetism.
- The useful life of magnetic and optical media is generally shorter than the useful life of paper and photographic film. In many cases, the stable life span of the media is shorter than retention periods for information stored on them.

- Data files stored on portable electronic media should be inspected periodically for readability and migrated to new media as necessary to mitigate media corruption. Portable electronic media shall be used only to store nonrecord material.
- Check with information technology (IT) personnel concerning new media (i.e., jump drives and other emerging devices) and their approved uses.

b. Retention and Disposition of Electronic Records

National Archives and Records Administration (NARA) regulations require that all records be covered by a records disposition schedule approved by the Archivist of the United States. Disposition schedules provide mandatory instructions for disposal of temporary records and transfer of permanent records.

Disposition schedules are based on record content rather than format or media. For example, there is no schedule for record copies of word processing files. The word processing file for a contract statement of work is covered by a procurement schedule, while a word processing file for a performance evaluation is covered by a personnel schedule.

A major electronic information system is required to have its own records disposition schedule.

c. Permanent Electronic Records

(1) Requirements

Permanent records have long-term value and are maintained indefinitely by NARA. These records are generally maintained in-house 10–25 years before they are transferred to NARA. Due to their volatile nature, electronic records are often transferred sooner (pre-accessioned) so NARA can ensure their preservation.

When there is a potential for loss of access and intellectual control due to technological and program changes, permanent electronic records may be transferred to NARA through a pre-accessioning process.

Pre-accessioning takes place when an organization transfers a copy of its electronic records to NARA while retaining legal custody over access to its records. The organization retains ownership and must respond to discovery efforts such as Freedom of Information requests until legal custody is conveyed to NARA. Pre-accessioning allows NARA to ensure the long-term preservation of permanent electronic records, and helps the organization mitigate the possibility of potential loss of its permanent electronic records.

Permanent electronic records must be stored and maintained on media meeting the requirements in 36 Code of Federal Regulations (CFR) 1228, Subpart C. This regulation provides guidance on selecting appropriate media and systems for maintaining electronic records, ensuring that electronic records are not lost and that dispositions can be implemented after conversion to a new storage medium or system, standards for maintaining magnetic computer tapes and direct access storage media, ensuring that storage media and systems are capable of retaining the records in a usable format until their disposition date.

The online NARA document, *Electronic Records Information for Archivists, Records Managers and IRM Personnel*, provides additional information concerning inventorying, scheduling, appraisal, and transferring of permanent electronic records.

(2) Records in Portable Document Format (PDF)

PDF is a priority electronic records format identified by NARA and partner agencies as part of the Electronic Records Management (ERM) initiative, one of the 24 E-Government initiatives under the President's Management Agenda. A major goal of this initiative is to provide the tools for agencies to access electronic records for as long as required and to transfer permanent electronic records to NARA for preservation and future use by Government and citizens.

To be accepted by NARA a PDF record must satisfy the following:

- The PDF record must comply with PDF versions 1.0 through 1.4 (i.e., all existing PDF versions).
- The PDF record must not contain security settings (e.g., self-sign security, user passwords, or permissions) that prevent NARA from opening, viewing, or printing the record.
- An electronic record converted to PDF from its native electronic format must include embedded fonts to guarantee the visual reproduction of all text as created. All fonts embedded in a PDF record must be publicly identified as legally embeddable (i.e., font license permits embedding) in a file for unlimited viewing and printing.
- A PDF record that contains embedded searchable text based on optical character recognition (OCR) must be identical in content and appearance to the source document. NARA understands that the ability to embed OCR text in PDF records enhances access to the records. While NARA will accept PDF records with uncorrected OCR text, it will not accept PDF records resulting from OCR processes that either alter the content or degrade the quality of the original bit-mapped image.

A PDF electronic record conforming to the PDF/A-1 standard satisfies NARA's electronic records preservation and accessibility requirements. PDF/A-1 refers to an international standard [*ISO 19005-1:2005, Document management - Electronic document file format for long-term preservation - Part 1: Use of PDF 1.4 (PDF/A-1)*] that specifies a version of the PDF designed to be more suitable for long-term preservation than traditional PDF.

In addition to PDF/A-1 compliance, transfers of permanent records must:

- Comply with NARA's transfer instructions for records in PDF. For NARA's transfer instructions on permanent PDF records, visit the NARA web site at: <http://www.archives.gov/records-mgmt/initiatives/pdf-records.html>.
- Meet NARA's transfer instructions for permanent scanned images of textual records. For NARA's transfer instructions on permanent scanned images of textual records, visit the NARA web site at: <http://www.archives.gov/records-mgmt/initiatives/scannedtextual.html>.

LM currently uses PDF/A-1 for all e-records stored in its electronic recordkeeping system.

d. Imaging Systems

Records personnel must take steps to ensure the authenticity of imaged records and to guard against technology obsolescence. Toward those goals:

- Images must contain all information shown on the originals and must be able to be used for the purposes the original records served;
- Procedures must be created and audit trails provided to serve as a record that the images were created properly;
- A migration plan must be developed to ensure that the information in the images can be accessed throughout the entire retention period (NARA must approve retention periods.);
- For new or proposed imaging systems, a cost-benefit analysis should be completed before choosing to implement any imaging system; and
- Scanned images of textual paper records converted to PDF must adhere to requirements in the NARA publication, *Expanding Acceptable Transfer Formats: Transfer Instructions for Scanned Images of Textual Records (Scanned Images Transfer Guidance)*.

e. References

LM procedures relating to electronic records management:

- LM Policy 200.1-2, Electronic Mail Records
- LM Procedure 200.1, Vital Records
- LM Procedure 200.2-1, Electronic Recordkeeping Systems and Electronic Information Systems
- LM Procedure 243.2, Preservation of Web Site-Related Records
- LM Procedure 1350.1, Audiovisual Records

NARA guidance relating to electronic records management:

- Frequently Asked Questions (FAQs) about Transferring Permanent Records in PDF/A-1 to NARA
- Frequently Asked Questions (FAQs) about Optical Storage Media: Storing Temporary Records on CDs and DVDs
- Frequently Asked Questions (FAQs) About Selecting Sustainable Formats for Electronic Records

Attachment C. – Criteria to Determine if a Document is a Record

Is This a Federal Record and Should it be Filed in Hummingbird?



1. Is it a draft or interim document that does not contain substantive comments and for which there is a final version maintained elsewhere?

Example: Working or draft copies, including any nonsubstantive comments, of documents such as letters, reports, or procedures where the final version or record copy is maintained in the official file.

YES

Non-Record

NO

2. Is it a copy of a document, e-mail, or correspondence kept only for convenience or reference on which no action is taken?

Example: My copy of a document I received via CC, BCC, forward, or photocopy, as well as copies of my own documents kept for my convenience or reference.

YES

Non-Record

NO

3. Is it published or processed information that you receive, accumulate, and/or use for reference but for which you are not responsible?

Example: Reference copies of orders, CFRs, regulations, etc. concerning your area of business.

YES

Non-Record

NO

4. Is it junk mail or documentation that has no direct work-related evidentiary value?

Example: Advertisements, journal articles, conference papers, trade magazines, seminar packets, etc.

YES

Non-Record

NO

5. Is it a document, e-mail, or correspondence with only transitory value not requiring retention beyond 6 to 12 months?

Example: Records with short-term value, such as those documenting routine activities, notifying participants of meetings, scheduling of trips/visits, and requesting routine information. Also included are letters transmitting documents that are filed separately from the transmitted document.

YES

It is a record. Retain until no longer needed, then destroy.

NO

6. Is it feeder data or information that is captured or summarized in a separate document or report?

YES

It is a record. Retain until no longer needed, then destroy.

NO

E-mail electronic record, in native format, to a Records Coordinator for placement in **Hummingbird** according to the designated **LM File Plan**. If in doubt or you have any questions, call your Records Coordinator.

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