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DATE November 14, 2018

RECORDS AND INFORMATION MANAGEMENT PROGRAM

REVIEW DATE: November 14, 2023

1.0 PURPOSE AND SCOPE

The purpose of this circular is to establish the policy and responsibilities for administering and implementing the Bureau of Engraving and Printing (BEP/Bureau) Records and Information Management (RIM) Program.

This circular applies to all BEP components in the Washington, DC Facility (DCF) and the Western Currency Facility (WCF).

2.0 POLICY

It is the policy of the BEP to plan and establish a framework for managing and overseeing a comprehensive Bureau-wide RIM Program; manage BEP records, emails, and electronic records effectively and efficiently throughout their lifecycle in order to accomplish BEP's mission; comply with the laws, regulations, and Federal agency-wide (e.g., NARA, GSA) and the Department of the Treasury (Treasury)- governing records management policies; and to ensure BEP employees and contractors receive adequate training on their records management responsibilities to maintain a functional RIM Program.

3.0 AUTHORITIES AND REFERENCES

- 3.1 The E-Government Act of 2002, 44 United States Code (USC) § [3501](#)
- 3.2 The Federal Records Act, 44 USC Chapters [21](#), [29](#), [31](#), [33](#), and [35](#)
- 3.3 The Freedom of Information Act, 5 USC § [552](#)
- 3.4 The Information Technology Management Reform Act, 40 USC §§ 1401-1503
- 3.5 The Paperwork Reduction Act, 44 USC §§ [3501](#) to [3520](#)
- 3.6 The Privacy Act of 1974, 5 USC § [552a](#)
- 3.7 18 USC § [2071](#), Concealment, removal or mutilation generally
- 3.8 Title 36 Code of Federal Regulations (CFR), Chapter XII, Subchapter B, "Records Management"
- 3.9 OMB Memorandum M-12-18, Managing Government Records Directive,
- 3.10 August 24, 2012. <https://www.archives.gov/files/records-mgmt/m-12-18.pdf>
- 3.11 General Service Administration Regulations, 41 CFR Chapter [102](#), Part 102-193
- 3.12 National Archives and Records Administration's Regulations, 36 CFR Chapter XII, Subchapter B, Parts 1220 -1239

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- 3.13 OMB Circular [A-11](#), Preparation, Submission, and Execution of the Budget, Section 300.3, Federal Requirements for Including Recordkeeping in Agency Electronic Information Systems, dated 2016
 - 3.14 OMB Circular [A -130](#), Management of Federal Information Resources, July 28, 2016
 - 3.15 Department of the Treasury's Regulations, 31 CFR Parts 0 and 1
 - 3.16 NARA Bulletin [2010-05](#), Guidance on Managing Records in Cloud Computing Environments, September 08, 2010
 - 3.17 NARA Bulletin [2012-02](#), Guidance on Managing Content on Shared Drives, December 06, 2011
 - 3.18 NARA Bulletin [2014-06](#), Guidance on Managing Email, September 15, 2014
 - 3.19 NARA Bulletin [2015-02](#), Guidance on Managing Electronic Messages, July 29, 2015
 - 3.20 NARA Bulletin [2015-04](#), Metadata Guidance for the Transfer of Permanent Electronic Records, September 14, 2015
 - 3.21 NARA Memorandum [AC 23.2016](#), Criteria for Managing Email Records
 - 3.22 NARA Transmittal No. 26: General Records Schedule 6.1, Email Managed Under a Capstone Approach (issued September 2016)
 - 3.23 NARA General Records Schedule (GRS), <https://www.archives.gov/records-mgmt/grs.html>
 - 3.24 Department of the Treasury, Directive (TD) [80-05](#), Records Management Program, dated January 31, 2018
 - 3.25 Department of the Treasury, Directive Publication (TD P) 80-05, Records Management, dated January 31, 2018
 - 3.26 Department of the Treasury, Directive TD [80-07](#), Department of the Treasury Email Management, dated January 17, 2017
 - 3.27 Department of the Treasury, Directive Publication (TD P) 80-07, Email Management, dated August 14, 2017
 - 3.28 BEP Records Schedule
<http://bepspapps/apps/RMS/BEP%20Records%20Control%20Schedule/Forms/Thumbnailails.aspx>
 - 3.29 NARA Handbook, "Disposition of Federal Records: A Records Management Handbook," 2016 Web Edition

4.0 SUPERSESION

- 4.1 This circular supersedes Circular No. 80-05, Records Management Program dated December 18, 2006.

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5.0 DEFINITIONS

- 5.1 **BEP Records Schedule:** Bureau-specific manual containing a description of BEP's records, emails, and electronic records and its disposition instructions approved by NARA.
- 5.2 **Creation:** The period in time that Bureau personnel in the course of their official duties record information regardless of origin that serves as evidence of BEP business transactions, decisions and actions taken, and document activities for which they are responsible.
- 5.3 **Destruction Hold:** A hold placed on the scheduled destruction of records due to foreseeable or pending litigation, administrative and/or law enforcement investigation, audit, or special organizational requirements. Also known as destruction moratorium or destruction suspension.
- 5.4 **Disposition:** A final administrative action with regard to a BEP record no longer needed to conduct BEP business. This action includes: (1) transfer to BEP records storage room, NARA's Federal Records Centers, or other Federal agency; (2) accessioning of permanent records to NARA; or (3) destruction of temporary records using approved processes and methods.
- 5.5 **Documentary Materials:** All media on which information is recorded, regardless of the nature of the medium or the method or circumstances of recording. The term usually refers to records and non-record materials, but it may also include personas papers.
- 5.6 **Electronic Information System:** A system that contains and provides access to computerized Federal records and other information.
- 5.7 **Electronic Mail (email):** A document created or received on an electronic mail system including brief notes, more formal or substantive narrative documents, and any attachments, such as word-processing and other electronic documents, which may be transmitted with the message.
- 5.8 **Electronic Mail System:** A computer application used to create, receive, and transmit messages and other documents. Excluded from this definition are file transfer utilities (software that transmit files between users but do not retain any transmission data), data systems use to collect and process data that have been organized into data files or data bases on either personal computers or mainframe computers, and word processing documents not transmitted on an e-mail system.
- 5.9 **Electronic Records/e-Records:** Information that is recorded in a form that only a computer can process and that satisfies the definition of a Federal record. The term

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includes the record content and associated metadata that the agency determines is required to meet agency business needs.

- 5.10 General Records Schedule (GRS): Mandatory disposal authorization for temporary administrative records common to several or all agencies of the Federal government. The GRS is issued by NARA.
- 5.11 Lifecycle of Records: The management concept that records pass through three stages: creation, maintenance and use, and disposition.
- 5.12 Maintenance and Use: Period in time that Bureau personnel take care of records so that information can be found when needed. This means setting up good directories and files, and filing materials (in whatever format) regularly and carefully in a manner that allows them to be safely stored and efficiently retrieved when necessary.
- 5.13 Non-Record: U.S. Government-owned informational materials that do not meet the statutory definition of records or that are specifically excluded from coverage by the definition of records (see 44 USC 3301). An agency's records management program also needs to include managing no record materials. There are specific categories of materials excluded from the statutory definition of records. These categories are:
 - 5.13.1 Library and museum material made or acquired and preserved solely for reference or exhibition purposes, such as physical exhibits, artifacts, and other material objects lacking evidential value.
 - 5.13.2 Duplicate copies of records (but only if the sole reason such copies are preserved is for convenience of reference).
 - 5.13.3 Stocks of publications and of processed documents. Catalogs, trade journals, and other publications that are received from other Government agencies, commercial firms, or private institutions and that require no action and are not part of a case on which action is taken. Stocks do not include serial or record sets of agency publications and processed documents, including annual reports, brochures, pamphlets, books, handbooks, posters and maps.
- 5.14 Owner of Records: Program office responsible for the creation, receipt, accumulation, and maintenance of BEP records.
- 5.15 Permanent Record: A Federal record appraised by NARA as having sufficient historical or other value to warrant continued preservation by the Federal Government beyond the time it is needed for administrative, legal, or fiscal purposes. Their disposition authority comes from NARA-approved SFs 115 or Disposition Authority Authorization (DAA).
- 5.16 Personal Papers: Documentary materials (in any media) belonging to an individual that are not used to conduct agency business. Personal papers should be maintained separately from records and non-records and may be removed from the BEP without BEP or NARA approval.
- 5.17 Record: All recorded information regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of

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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 of the United States or because of the informational value of data in them.

- 5.18 Records Management: The planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to the creation, maintenance and use, and disposition of BEP records in order to achieve adequate and proper documentation of the policies and transactions of BEP.
- 5.19 Temporary Record: A Federal record that has been determined by the Archivist of the United States to have insufficient value to warrant its preservation by the NARA.
- 5.20 Unscheduled Record: A Federal record whose final disposition has not been approved by NARA and must be treated as permanent until a disposition is approved by NARA.

6.0 RESPONSIBILITIES

6.1 The Assistant Secretary for Management for the Department of the Treasury (Treasury):

- 6.1.1 Acts as BEP's Senior Agency Official for Records Management.
- 6.1.2 Formally informs the name, title, address, phone and email of the designated BEP's Records Officer to the National Archives and Records Administration (NARA).

6.2 The Director of the BEP:

- 6.2.1 Implements, manages, and maintains BEP's RIM Program and ensures compliance with all applicable records and information management statutes, regulations, and NARA, OMB, GAO, GSA, and Treasury-wide policies.
- 6.2.2 Delegates BEP's RIM Program to the Associate Director (Chief Information Officer) (CIO).

6.3 The BEP's CIO:

- 6.3.1 Acts on behalf of the Director to ensure that BEP's RIM Program efficiently and appropriately complies with all applicable records management statutes, regulations, and policies.
- 6.3.2 Designates the Bureau Records Officer (RO) and provides their name to the Chief of the Office of Critical Infrastructure and IT Security.
- 6.3.3 Ensures that records management requirements include adequate resources.

6.4 The Chief of the Office of Critical Infrastructure and IT Security:

- 6.4.1 Notifies the Office of Privacy, Transparency and Records (PTR), Records and Information Management Division the name and contact information of the Bureau Records Officer on a semi-annual basis (by the dates designated by PTR), and any change in Bureau Records Officer within five business days of such change;

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- 6.4.2 Supports the BEP RIM Program, Division Manager, and the RO to implement all records and information management and Treasury/BEP policies as applicable.
- 6.4.3 Supervises the RO along with the Division Manager.
- 6.5 The RO:
- 6.5.1 Serves as BEP's records liaison to PTR and NARA.
 - 6.5.2 Implements and manages an effective RIM Program across all Bureau program offices at the DCF and WCF;
 - 6.5.3 Shall possess NARA's Certificate of Federal Records Management Training;
 - 6.5.4 Responds to RM data calls from PTR;
 - 6.5.5 Promulgates and communicates BEP RIM policies and guidance that reflects the RIM Program mission and goals;
 - 6.5.6 Ensures the RIM Program evaluations are performed to determine the degree of compliance with all applicable records management statutes, regulations, and policies;
 - 6.5.7 Develops, implements, and monitors records lifecycle (creation, identification, management and disposal) management procedures and related activities to ensure Bureau-wide standardized procedures and uniformity;
 - 6.5.8 Maintains and revises the Bureau's Records Control Schedules (RCS) including submission of schedules for all existing paper, electronic and other non-electronic records to NARA for approval;
 - 6.5.9 Recommends improvements for the effective utilization, space, equipment, supplies, and human resources associated with the creation, identification, management and disposal of records;
 - 6.5.10 Ensures the transfer of permanent records to NARA in accordance with the approved RCS;
 - 6.5.11 Supports program office inventories of Bureau records and respond to related reporting requirements;
 - 6.5.12 Coordinates the development of a Bureau-level capstone approach to email records management procedures;
 - 6.5.13 Coordinates the creation and maintenance of a capstone officials list for BEP;
 - 6.5.14 Provides RIM training to the Bureau's Records Liaison Officers (RLO), Office Chiefs, and other personnel, when needed;
 - 6.5.15 Documents and enforces a destruction freeze upon notification from the Office of the Chief Counsel on the disposition of any records under the custody of the RIM program involved or potentially involved, with current or anticipated legal actions and claims and uploads the litigation hold in BEP's records management electronic site;

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- 6.5.16 Encourages program offices to develop and use technology applications to improve the management of records and information;
 - 6.5.17 Trains BEP employees and contractors on their records management responsibilities as defined in NARA regulations and guidance; and
 - 6.5.18 Provides guidance to departing BEP personnel regarding any proposed removal of potential records.
- 6.6 All Bureau Associate Directors and Office Chiefs:
- 6.6.1 Create and preserve Federal records that adequately and properly document the organization, functions, policies, decisions, procedures, and essential transactions of the component;
 - 6.6.2 Establish effective management controls over the creation, maintenance, and use of Federal records;
 - 6.6.3 Provide for the security of records by establishing safeguards against the unauthorized removal or destruction of Federal records;
 - 6.6.4 Designate a Records Liaison Officer (RLO) as required for the execution of collateral RM duties in each Directorate or Office. In the absence of an appointed RLO, the Office Chief will assume RLO duties;
 - 6.6.5 Comply with this circular and relevant laws, regulations, and guidelines;
 - 6.6.6 Cooperate with the Office of Chief Counsel's efforts to monitor compliance with any litigation-related record and non-record material preservation efforts;
 - 6.6.7 Establish effective management controls over the creation, identification, management, and disposition of Federal records under their purview that adequately and properly document the organization, functions, policies, decisions, procedures, and essential transactions of the component;
 - 6.6.8 File records in a responsible, complete, consistent, and logical manner;
 - 6.6.9 Establish safeguards against the unauthorized removal or destruction of Federal records;
 - 6.6.10 Establish and implement procedures to ensure that departing officials, employees, consultants, and contractors do not remove documentary materials from the custody of the Bureau without appropriate written authorization;
 - 6.6.11 Review their internal records practices periodically;
 - 6.6.12 Ensure systematic removal or disposal of non-records that are not;
 - 6.6.13 Advise on RM functionality requirements, including the capture, retrieval, and retention of records according to BEP business needs and NARA-approved records schedules are incorporated into the design, development, and implementation of electronic information systems; and
 - 6.6.14 Cooperate with Office of the Chief Counsel's efforts in assisting BEP's obligation to preserve certain records and other documents (e.g., litigation holds) that are

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relevant or may lead to discovery of relevant information during periods of actual or anticipated litigation.

6.7 Records Liaison Officers (RLO):

- 6.7.1 Coordinate records lifecycle (creation, identification, management and disposal) management procedures with RM program representatives and Bureau RO;
- 6.7.2 Coordinate with the RO of all dispositions of Bureau Records to include electronic systems;
- 6.7.3 Provide the RO with a list of records proposed for transfer to NARA, indicating type/name, BEP or GRS record series, records date range covered, owner of the record, and point of contact;
- 6.7.4 Assist the RO with training/outreach activities to the Office/Division/Bureau staff on records management subject;
- 6.7.5 Conduct annual records management self-assessment and essential records review;
- 6.7.6 Conduct accurate records inventory of their assigned area; and
- 6.7.7 Update Office File Plans (OFP).

6.8 The Office of the Chief Counsel:

- 6.8.1 Notifies the appropriate Bureau personnel of the obligation to preserve certain records and other documents (e.g., litigation holds) that are relevant or may lead to discovery of relevant information during periods of actual or anticipated litigation.

6.9 Bureau employees and contractors:

- 6.9.1 Comply with all applicable records and information management statutes and Treasury's regulations concerning the care of agency records;
- 6.9.2 Separate Federal records and personal papers;
- 6.9.3 Maintain records in a manner that facilitates their easy retrieval when needed, and
- 6.9.4 Review all records annually to ensure that only authorized records are being maintained, the appropriate storage method has been selected, and the records that are no longer of value have been properly disposed of in accordance with a NARA-approved BEP records schedule, General Records Schedule (GRS) and the procedures noted within this circular.

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7.0 OFFICE OF PRIMARY RESPONSIBILTIIY

Office of Critical Infrastructure and IT Security

<electronically approved>
Leonard R. Olijar
Director