



# United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, DC 20240

## Memorandum

To: Assistant Secretaries  
Heads of Bureaus and Offices

Through: Deborah (June) Hartley  
Acting Chief Information Officer  
Office of the Chief Information Officer

From: David Alspach  
Department Records Officer  
Office of the Chief Information Officer

Subject: Records Management Policy RMP-2021-02: Electronic Records Management

The U.S. Department of the Interior (Department) Records Management Program is updating policies and guidance to ensure that the Department's records management practices remain in compliance with the most recent technology, guidance, and laws. Records Management Policy RMP-2021-02: *Electronic Records Management* is the latest update. This policy helps Departmental staff understand the requirements to manage records electronically and that they are no longer required to "print and file" records for official recordkeeping purposes.

The National Archives and Records Administration (NARA) and Office of Management and Budget (OMB) jointly released M-19-21, *Transition to Electronic Records*, which requires all executive branch agencies to create and preserve all Federal records electronically. Departmental staff need to adhere to the Electronic Records Management Policy to ensure electronic records are adequately preserved and work with the respective Responsible Records Officer to lift the "print and file" requirement when appropriate.

Please ensure this policy is shared with all staff as appropriate. If you have any questions regarding your records management program, please contact the Responsible Records Officer for your bureau or office.

Attachment: Records Management Policy RMP-2021-02: *Electronic Records Management*

cc: Bureau and Office Deputy Directors  
Bureau and Office Chief of Staffs  
Bureau and Office Associate Chief Information Officers  
Bureau and Office Records Officers

**Records Management Policy: RMP-2021-02**

**Subject: Electronic Records Management**

**1. Effective Date:**

This policy is effective on **September 8, 2022**.

**2. Version:**

Version #	Description	Comment
1.0	Initial Policy	Initial Policy Issued

**3. Rescissions**

- A. 382 DM 11: *Managing Records in Electronic Form*
- B. Office of the Chief Information Officer (OCIO) Memorandum: *Criteria for Considering Enterprise Records and Document Management System*, dated May 11, 2011
- C. OCIO Memorandum: *Criteria for Considering Exceptions to the Freeze on Implementation of Any New FOIA Tracking Systems or Electronic Record-Keeping Systems*, dated July 6, 2000

**4. Prepared by**

- A. Dave Alspach, Departmental Records Officer, September 28, 2020.
- B. Mary Beth Roberts, Responsible Records Officer, Bureau of Trust Funds Administration, September 28, 2020.

**5. Purpose**

This policy provides the requirements for creating, maintaining, using, and dispositioning electronic records. It also provides requirements for protecting and safeguarding Department of the Interior (DOI, Department) electronic records and information within DOI's approved electronic records management system.

**6. Scope**

This policy applies to all Departmental staff. Bureaus and offices may issue and implement additional policies and procedures consistent with this policy

**7. Authorities**

- A. [44 USC Chapter 29, Records Management by the Archivist of the United States and by the Administrator of General Services](#)
- B. [44 USC Chapter 31, Records Management by Federal Agencies](#)

- C. [36 CFR 1220, Federal Records; General](#)
- D. [36 CFR 1236, Electronic Records Management](#)
- E. [Office of Management and Budget \(OMB\) M-19-21, Transition to Electronic Records, June 28, 2019](#)
- F. [National Archives and Records Administration \(NARA\) Bulletin 2014-04, Format Guidance for the Transfer of Permanent Electronic Records \(as revised by NARA Bulletin 2018-01, August 2018\)](#)
- G. [NARA Bulletin 2015-02, Guidance on Managing Electronic Messages](#)
- H. [NARA Bulletin 2015-04, Metadata Guidance for the Transfer of Permanent Electronic Records](#)
- I. [OCIO Directive 2015-003, Notice of Disclosure Requirements for Official Business Conducted Using Non-Official Electronic Messaging Accounts, May 21, 2015](#)

## 8. Policy

- A. The DOI Records Management Program objectives include providing policy, planning, and guidance in support of the maintenance and use of electronic records that:
  - 1. Provide for the management of records in electronic format that meets NARA’s document and system functionality requirements for Federal records;
  - 2. Provide for compliance with NARA regulations and guidance, Executive orders, and OMB Circular A-130 on the management of all electronic records;
  - 3. Establish responsibilities for all Departmental staff with specific responsibilities for program managers, records and information management staff, and information technology (IT) staff; and
  - 4. Allow bureaus and offices to designate the electronic document as a Federal record and lift the requirement to “print-and-file” once the provisions of this policy are met. For consistency across the Department, it is strongly recommended that bureaus and offices designate electronic documents as Federal records at the disposition authority or file code level.
- B. **Electronic Records:** Per 36 CFR 1220.18, “electronic records include any information that is recorded in a form that only a computer can process and that satisfies the definition of a Federal record under the Federal Records Act.” The requirements for appropriately maintaining electronic records include the following:
  - 1. Electronic preservation requirements for maintaining agency records are defined in 36 CFR 1236 to ensure the reliability, authenticity, integrity, usability, content, context, and structure of electronic records.

2. All information meeting the definition of an electronic record must be preserved in accordance with the approved NARA records schedules regardless of records locations (e.g., social media sites, shared drives, internet and intranet sites, cloud environments).
  3. All electronic records must be managed in an electronic information system (EIS) or DOI-approved electronic records management system that incorporates functionalities to enable preservation of the Federal record with integrity throughout the record lifecycle. Identification, maintenance, and disposition will be performed in accordance with NARA-approved records schedules.
  4. Bureaus and offices are encouraged to create and organize records electronically and maintain them electronically throughout their life cycle.
  5. Passwords or other forms of file level encryption—including digital rights management (DRM) technologies commonly used with audio, video, and some publications—must be deactivated prior to archiving.
  6. Metadata must meet both NARA requirements as defined in NARA Bulletin 2015-04, and agency business needs.
  7. Digital and electronic signatures, in support of electronic content, are acceptable for maintaining and preserving the authenticity of electronic records in accordance with Records Management Policy RMP-2020-01, *Digital Signature Usage in Records*.
  8. Electronic records may require retention beyond the requirements of NARA-approved records schedules to support Freedom of Information Act (FOIA) requests, Congressional oversight requests, and legal matters including legal hold, discovery, or other document production requests. Consult with the Office of the Solicitor on specific preservation requirements.
- C. **Digitization:** Digitization is the activity of reproducing physical records digitally with the goal of disposing the original source records. Digitally reproduced (digitized) temporary records may be designated and accepted as the official recordkeeping copy. In these cases, the original source records may become intermediary records and may be destroyed. Before allowing the destruction of the original source records, Departmental staff must observe the following guidelines when digitizing records and designating the digitized version as the official recordkeeping copy:
1. Meet or exceed the digitization and validation standards established in 36 CFR 1236 subpart D, *Digitizing Temporary Federal Records*;
    - a. Capture all information contained in the original source records;
    - b. Include all the pages or parts from the original source records;
    - c. Use the digitized versions for all the purposes the original source records serve, including the ability to attest to transactions and activities; and

- d. Validate that the digitized versions are of suitable quality to replace original source records, document the validation process, and retain that documentation for the life of the validation process, or for the life of any records digitized using that process, whichever is longer (36 CFR 1236.34).
2. Store digitized versions in an approved EIS or a DOI-approved electronic records management system.
  3. When digitization is complete, ensure that all requests for destruction of the original source records are approved by the appropriate Responsible Records Officer (RRO), and comply with Records Management Policy RMP-2020-03, *Federal Records Disposal Authorization*, before disposing of original source records.
  4. The NARA has not finalized the regulations for digitizing permanent records. Until the NARA regulations on permanent records are published, bureaus and offices should not undertake large or expensive permanent record digitization projects unless there is significant potential for record loss through technological obsolescence or other factors. In all cases these projects must be approved by the RRO.
- D. Electronic Messaging Records:** According to the Federal Records Act (44 U.S.C. § 2911.c.1), electronic messages refer to “electronic mail and other electronic messaging systems that are used for purposes of communicating between individuals.” This includes email, text messages, instant messages, social media, or other similar forms of communication. Departmental staff are responsible for:
1. Preserving email that meets the definition of a Federal record sent or received from the Department’s email and collaboration system in a DOI-approved electronic records management system;
  2. Producing emails that are responsive to FOIA requests, litigation, or other document production requests;
  3. Preserving text and instant messages in accordance with Records Management Policy RMP-2020-11, *Preserving Text and Instant Messages as Federal Records*.
  4. Retaining electronic records per NARA-approved records schedules. Departmental staff should coordinate with their RRO on any questions regarding Federal record retention; and
  5. Preserving all forms of electronic messages pertaining to government business sent or received from personal messaging accounts or devices in a DOI-approved electronic records management system in accordance with OCIO Directive 2015-003, *Notice of Disclosure Requirements for Official Business Conducted Using Non-Official Electronic Messaging Accounts*.
- E. Electronic Information Systems (EIS):** Bureaus and offices must identify all EIS containing Federal records and ensure the systems have the appropriate records

management controls as identified in 36 CFR 1236, subpart B in addition to the following:

1. All EIS must have an approved records schedule. Bureau records and information management (RIM) staff may submit a records schedule for an EIS to NARA for approval if the Departmental Records Schedule (DRS) to which the EIS is mapped has not yet been approved.
2. The RROs or their designees must participate in the design, development, and implementation of new EIS as defined in 36 CFR 1236, subparts B and C.
3. All EIS must have documented and approved procedures to enable the migration of Federal records and associated metadata to new storage media or formats so that Federal records are retrievable and usable as long as needed to conduct agency business and to meet NARA-approved dispositions as identified in 36 CFR 1236.20.

**F. DOI-Approved Electronic Records Management System:** The OCIO determines all DOI-approved electronic records management systems. These systems must have the ability to classify content based on NARA-approved records schedules, apply litigation or preservation holds as documented on the legal hold list provided by the Office of the Solicitor, and to disposition records by either accessioning permanent records to NARA, or disposing of temporary records according to NARA-approved records schedules.

1. The OCIO will maintain a list of DOI-approved electronic records management systems.
2. Departmental restrictions remain in effect regarding the freeze on purchasing, developing, and implementing any additional electronic records management or document management systems.
3. Requests for exceptions must document the ability of the proposed system to meet the requirements in paragraph 8.F, demonstrate the unique business requirement that cannot be met by one of the current DOI-approved electronic records management systems, and be approved by the Associate Chief Information Officer (ACIO) for the requesting bureau or office, the Senior Agency Official for Records Management (SAORM) and the Departmental Records Officer (DRO).

## **9. Responsibilities**

### **A. Departmental Records Officer**

1. Provides records management and preservation requirements for the design, development, enhancement, and implementation of DOI-approved records management systems;
2. Reviews, oversees, and ensures compliance of DOI EIS containing records;

3. Provides for efficient and cost-effective use of electronic recordkeeping within the Department;
4. Monitors DOI's electronic recordkeeping program activities;
5. Reviews and approves justified bureau- and office-requested additions to the list of DOI-approved electronic records management systems;
6. Provides guidance and support and ensures compliance with DOI's efforts to develop and maintain an Electronic Records Management Program; and
7. Ensures all DOI-wide information systems created or procured meet NARA requirements for electronic records system functionality.

B. Responsible Records Officers

1. Maintains an inventory of bureau or office EIS containing records;
2. Oversees the creation, maintenance, and disposition of electronic records;
3. Serves as the bureau or office liaison to the Department in matters related to electronic recordkeeping requirements; and
4. Develops and implements internal policies, directives, principles, practices, and procedures to prevent the loss, removal, theft, or unauthorized access to records created or received in electronic form.

C. Managers and Supervisors

1. Manages records created and maintained within an EIS or a designated Departmental records and document management system;
2. Coordinates EIS activity with the RRO to ensure compliance with regulations, OMB A-130 Circular, policy and procedures, and ensures capture of records within a DOI-approved electronic records management system;
3. Incorporates records management requirements into the design, development, and implementation of an EIS or a designated Departmental records and document management system; and
4. Coordinates information system commissioning and decommissioning activities with the RRO to ensure preservation of permanent and long-term temporary records, and compliance with NARA regulations and DOI's information systems decommissioning methodology.

D. Departmental Staff

1. Coordinate information systems commissioning and decommissioning activities with the RRO to ensure preservation of permanent and long-term temporary records, and

compliance with NARA regulations and DOI's information systems decommissioning methodology;

2. Ensure that specified metadata is captured per NARA records management requirements and DOI standard operating principles and procedures relate to the designated Departmental records and document management system;
3. Capture metadata for electronic records required per NARA requirements and any additional bureau or office requirements; and
4. Coordinate all proposed changes in the disposition of the records based on business or potential researcher interest with the RRO.