

MS 892 Records Management

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Attachments

Attachment A – Guide to Peace Corps Records Schedules (Headquarters and Recruiting Offices)
Attachment B – Guide to Peace Corps Records Schedules (Posts)

1.0 Authorities

44 U.S.C. §3101, *et seq.*; 44 U.S.C. §2911; 44 U.S.C. §3301; Federal Records Act, 36 CFR Chapter XII Subchapter B, Parts 1220-1249; the Federal Acquisition Regulations (FAR); and Federal Continuity Directive (FCD) 1.

2.0 Purpose

This Manual Section sets out the policies for administering the Peace Corps' Records Management Program.

3.0 Scope

Federal agencies are responsible for establishing and maintaining a Records Management Program that complies with National Archives and Records Administration (NARA) and General Services Administration (GSA) regulations and guidance. Federal law requires that the head of each federal agency make and preserve “Records” containing “Adequate and Proper Documentation” (*see* definitions in subsection 4.0 below) of the organization. The policies within this Manual Section cover the creation/use, maintenance, retention, storage, and “Disposition” (*see* definition in subsection 4.0 below) of all agency Records.

This Manual Section applies to all:

- (a) Records, regardless of format, created or received by the agency, both domestically and overseas, in the course of agency business and
- (b) Agency personnel includes federal employees and except as otherwise noted, personal services contractors (PSCs), volunteers (other than Peace Corps Volunteers), interns, contractors, and others that create, receive, access, or use federal records on behalf of the agency.

4.0 Definitions

As used in this Manual Section, the following terms shall have the meanings set forth below:

- (a) **Active / Inactive Records** refers to whether documents are currently being utilized by the agency. Records currently in use by the agency are Active. Records not currently used by the agency are Inactive. The status of current use may determine where Records are stored until the approved “Retention Limit” (*see* definition below) ends.
- (b) **Adequate and Proper Documentation** means a Record of agency business that is complete and accurate to the extent required to document the organization, functions, policies, decisions, procedures, and essential transactions of the agency. It also includes a Record of the information necessary to protect the legal and financial rights of the government and of persons directly affected by the agency's activities.
- (c) **Annual File Plan and Records Clean-Up** is the annual process whereby all agency offices and Posts review their File Plans (*see* more information in definition of File Plan above) and Records and delete or destroy all Temporary Records (both paper and electronic) (*see* definition below) that have met or exceeded their Retention Limit, according to their legally mandated DA instructions in the most current File Plan. Permanent Records (*see* definition below) that have met or exceeded their approved Retention Limit in accordance with their DA must be Transferred to NARA (*see* definition of “Transfer” below). Longer retention of Permanent Records requires written approval from NARA.

Processes for disposal and destruction of Temporary Records includes the following:

- (1) Paper Records that do not contain sensitive information are normally shredded and the shredded paper is recycled.
 - (2) Privacy Act or other sensitive Records must be destroyed in a manner that ensures no data can be recovered. Methods that may be used for destroying paper Temporary Records include pulping, shredding, and maceration.
 - (3) Electronic Temporary Records that do not contain sensitive information can be deleted.
 - (4) Electronic Temporary Records that contain Privacy Act or other sensitive information should be destroyed by degaussing or reformatting.
- (d) **Capstone Officials** are those political appointees and senior officials whose emails have been deemed to have historical significance and will be accessioned to NARA for permanent preservation. They include the head of the agency; principal assistants to the head of the agency, such as Associate Directors and deputies in all positions above, including the Deputy Director of the Peace Corps; principal management positions, such as Chief Information Officer and Chief Financial Officer; directors of significant program offices; Regional Directors; and roles or positions that routinely provide advice and oversight to the agency, including the General Counsel, Chief of Staff, Chief of Operations

and Administration, and Inspector General. Additionally, an individual serving in any of the above positions in an acting capacity for more than 60 calendar days is considered a Capstone Official. Federal regulations require that the list of Capstone Officials be updated on a regular basis, whenever there is a major agency reorganization and upon each change in presidential administration.

- (e) ***Controlled Unclassified Information (CUI)*** is information the U.S. Government creates or possesses, or that an entity creates or possesses for or on behalf of the U.S. Government, that a law, regulation, or U.S. Government-wide policy requires or permits an agency to handle using safeguarding or dissemination controls. CUI does not include classified information.
- (f) ***Cut-off*** is when a Record Series (*see* definition below) needs to be broken before an approved Disposition can be applied. Cut-offs involve the closing of old Files (*see* definition below) and the opening of new ones at regular intervals. Cut-offs may be effected at the end of a calendar year or fiscal year, upon a published date, at the termination of a contract, or at any other point as set forth in an office's "File Plan."
- (g) ***Disposition*** means action taken regarding the legally approved disposal of Records no longer needed for agency business, either through physical and legal Transfer to NARA; deletion or destruction; or, in rare instances, donation to another government agency, academic institution, or other organization with approval from NARA through the Agency Records Officer for Temporary Records. Federal regulation does not allow retention of Records beyond their approved "Retention Limit" (*see* definition below) without the express written permission of NARA (except for Records placed under legal "Holds," which is also defined below).
- (h) ***Disposition Authority (DA) (also known internally as "Records Schedules")*** means a legal directive approved by NARA containing the Records' descriptions and mandatory Disposition instructions. DAs authorize the amount of time Records must be retained, the destruction of Temporary Records, or the Transfer of Permanent Records to NARA. A Peace Corps specific DA is required for all agency Records not scheduled (i.e., included) on the General Records Schedule (GRS) issued by NARA (*see* definition below). The instructions in DA's must be followed and any changes to instructions or retentions must be approved by NARA.
- (i) ***Electronic Messages (EMs)*** means electronic mail and other electronic messaging systems (EMSs) used to communicate between individuals. EMSs allow users to communicate in real-time or to send messages for later viewing. EMSs are used to send messages from one account to another account or from one account to many accounts. Many EMSs also support the use of attachments. EMs can reside on agency networks and devices, on personal devices, or be hosted by third party providers. Examples of EMs include texts, chats, and instant messages. The Peace Corps must capture, manage, and preserve EMs and electronic Records with appropriate metadata and must be able to access and retrieve electronic Records, including EMs, through electronic searches for the entire approved Records Retention Limit.

- (j) **Essential Records** are those Records that are needed to perform the most critical functions of the agency and those needed to protect the legal and financial rights of the U.S. government and of the persons affected by its actions.
- (k) **File** means an arrangement of Records, usually a collection of materials on a specific subject matter. The term is used to denote any Recorded Information (*see* definition below), regardless of physical form or characteristics, accumulated in any type of storage space or arrangement.
- (l) **File Plan** is the document that contains the title, description, DA, mandatory retention instructions, and location of all identified Records held in an office. NARA requires all federal agencies to create File Plans and keep them current. File Plans are required to be updated at least annually, taking into account all changes to DAs. Each year the Records Management Office (RMO) sends out the “Annual File Plan Review” document to all offices at Headquarters and at Posts for agency personnel to review their current Records holdings, identify and report the location of all Record Series in the office (in paper and/or electronic format) and determine whether any Record Series contains sensitive data (e.g., personally identifiable information (PII)) that must be safeguarded, and report any newly created/received Records not currently reflected on the File Plan. The completed document is returned to the RMO.
- (m) **Freeze/Hold** indicates Records for which a scheduled Disposition has been temporarily suspended because of special circumstances that alter the administrative, legal, or fiscal value of the Records.
- (n) **General Records Schedules (GRS)** is the set of DAs issued by the Archivist of the United States to provide agencies with DA for Records common to several or all agencies of the federal government. These schedules authorize, after specified periods of time, the destruction of Temporary Records or the Transfer of Permanent Records to NARA. Agencies must use the GRS if applicable to any Records the agency creates or receives.
- (o) **Life Cycle** means the three basic stages in the life of a Record – creation or receipt, maintenance and use, records Cut-off at end of active use, and Disposition (i.e., what happens to the Record at the end of its Active and Inactive life).
- (p) **The National Archives and Records Administration (NARA)** is the nation’s Record-keeper for Records that have been determined by the Archivist of the United States to have sufficient historical or other value to warrant their continued preservation by the federal government and that have been Transferred to the physical and legal custody of NARA.
- (q) **Non-Records/Non-Record Materials** are federally-owned informational materials that do not meet the statutory definition of Records. These materials include extra copies of documents kept only for reference, stocks of publications and processed documents, and library or museum materials intended solely for reference or exhibit.
- (r) **Permanent Record** means any federal Record that has been determined by NARA to have sufficient value to warrant its preservation, beyond the business use of the agency, by NARA for eventual release to the public for research. Permanent Records cannot be

destroyed, deleted, or donated and must be maintained by the agency for the approved Retention Limit until Transferred to NARA. The Peace Corps must Transfer Permanent Records to NARA when they have met their Retention Limit in accordance with their DA and in a format acceptable to NARA at the time of Transfer.

- (s) **Recorded Information** includes all traditional forms of Records, regardless of physical form or characteristics, including information created or received, manipulated, communicated, or stored in digital or electronic form.
- (t) **Recordkeeping Requirements** means all statements in statutes, regulations, and agency directives or authoritative issuances that provide general and specific requirements for federal agency personnel on particular Records created or received and maintained by the agency and conveyed to all agency personnel.
- (u) **Recordkeeping System** is a manual or automated system in which Records are collected, organized, and categorized to facilitate their preservation, retrieval, use, and Disposition.
- (v) **Records** include all Recorded Information, regardless of form or characteristics, created or received by a federal agency under federal law, or in connection with the transaction of public business, and preserved, or deemed 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 U. S. government or because of the informational value of data in them.
- (x) **Records Management** means the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to Records creation, maintenance and use, storage, and Disposition.
- (y) **Records Schedule** has the same meaning as DA defined above.
- (z) **Record Series** is a set of Records that relate to a particular subject or function, result from the same activity, document a specific kind of transaction, take a particular physical form, or are related to one another due to their creation, receipt, or use, and Cut-off at end of active use.
- (aa) **Retention Limit** means the length of time that NARA has determined an agency must maintain Records to meet legal and business requirements. The Retention Limit is specified in the DA for each Record. All Records must be captured and retained in the appropriate electronic location, or designated storage cabinets for physical Records, maintained by each office. Offices that use third party vendors' software are responsible for ensuring that Records are managed according to the current File Plan. Neither Permanent Records nor Temporary Records, with the exception of Records subject to a legal Hold, may be retained by the agency beyond its approved Retention Limit without written permission from NARA
- (bb) **Scheduling Process** involves the actions needed for Records for which there is no approved DA. Those Records are reviewed by the Agency Records Officer and described using details, such as creating office, date of initial creation, use, access restrictions, volume, retention, and value (i.e., Temporary or Permanent Record). That information is provided to

NARA for approval. When requesting a “Temporary” value for Records, NARA must notify the public in the Federal Register that the Records will eventually be destroyed. Permanent Records are eventually Transferred to NARA when the Retention Limit has been met.

- (cc) ***Temporary Records*** means a Record approved by NARA for disposal (i.e., destruction) after a specified Retention Limit that is no longer needed for business or legal purposes of the agency.
- (dd) ***Transfer*** means the movement of Records. Active paper Records are usually maintained in the office for quick retrieval. Inactive paper Records are often Transferred to off-site storage until the Retention Limit has been met. Permanent Records where the Retention Limit has been met must be Transferred to NARA.
- (ee) ***Unscheduled Records*** means federal Records for which the final DAs have not been approved by NARA. If an office has Records that they create or receive in carrying out agency business but do not see them listed in their File Plan or in MS 892 Attachment A – Guide to Peace Corps Records Schedules (Headquarters and Recruiting Offices) or MS 892 Attachment B – Guide to Peace Corps Records Schedules (Post), those Records must be reported to the Agency Records Officer. Unscheduled Records must be treated as Permanent Records until a DA is approved.

5.0 Roles and Responsibilities

5.1 The Peace Corps Director

The Peace Corps Director (Director), or senior level official designated by the Director, is required to make and preserve Records containing Adequate and Proper Documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the U.S. government and of persons directly affected by the agency’s activities.

5.2 The Senior Agency Official for Records Management

The Chief Information Officer (CIO), or other senior level official as may be designated by the Director, serves as the Senior Agency Official for Records Management (SAORM) and is responsible for:

- (a) Overseeing the establishment and implementation of Records policies and procedures;
- (b) Maintaining Records of the agency's functions, policies, decisions, procedures, and essential transactions;
- (c) Ensuring that Peace Corps Records adequately protect the legal and financial rights of the U.S. government and of persons directly affected by the agency's activities; and
- (d) Coordinating with the Agency Records Officer and appropriate agency officials to ensure the agency’s compliance with Records Management statutes and regulations, including

annual Records Management training requirements and the Annual File Plan and Records Clean-Up.

5.3 Agency Records Officer

The Agency Records Officer is responsible for:

- (a) Establishing and maintaining an active, continuing Records Management Program that complies with NARA, OMB, and applicable General Services Administration (GSA) regulations and guidance and that economically and efficiently manages Peace Corps Records;
- (b) Providing Records Management guidance and training to headquarters offices, domestic field offices, and overseas Posts;
- (c) Establishing schedules for the Transfer of Records to paper Records storage centers and for the Transfer of Permanent Records to NARA;
- (d) Establishing safeguards against removal or loss of Records;
- (e) Ensuring that MS 892 Attachment A and Attachment B reflect current federal laws and regulations;
- (f) Briefing Capstone Officials, including those appointed to Capstone Official positions in an acting capacity, about their Records Management responsibilities upon arrival at, and prior to departure from, the Peace Corps, and reviewing the inventory and, if necessary, the actual copies of Records proposed for removal, if any, prior to a Capstone Official's departure;
- (g) Providing targeted Records Management training to Capstone Officials within three to six months prior to a potential change of presidential administration; and
- (h) Acquiring approval for agency DAs for the management of all agency Records regardless of format;

5.4 Capstone Officials

Capstone Officials are responsible for:

- (a) Receiving an incoming Records Management briefing from the Agency Records Officer;
- (b) Properly maintaining all agency Records and EM accounts that they manage and any EM accounts managed on their behalf by other agency personnel, such as by personal assistants, confidential assistants, or administrative assistants;
- (c) Conducting Peace Corps business only on agency EM accounts, except in rare occurrences. If sending or receiving a Record using a non-official EM account, they are responsible for copying or forwarding a complete copy of the EM Record to an official EM account or other

approved Recordkeeping System not later than 20 days after the original creation or transmission of the Record;

- (d) Reporting any unauthorized destruction or loss of Records to the Agency Records Officer immediately upon discovery of destruction or loss;
- (e) Prior to departure from the Peace Corps, completing a “Capstone Official Records Exit Briefing,” facilitated by the Agency Records Officer; and
- (f) At least 10 days prior to their departure from the agency, providing an inventory of proposed copies of Records for removal, along with a completed “Copies of Records Removal/Non-Removal Certification” (Form PC-2168), to the Agency Records Officer.

5.5 Office Directors

Office Directors, including Associate Directors, Regional Directors, Country Directors, and other office heads, are responsible for:

- (a) Administering the agency's Records Management Program within their area of responsibility;
- (b) Ensuring that all agency personnel who report to them are aware of their Records Management responsibilities and that resources, such as MS 892 Attachments A and B, are available to them;
- (c) Coordinating the office's Recordkeeping Requirements with the Agency Records Officer, including notification regarding any new types of Records the office may be creating or receiving;
- (d) Reporting any unauthorized destruction or loss of Records to the Agency Records Officer immediately upon discovery of destruction or loss;
- (e) Reviewing the inventory and actual Record copies, if necessary, of any agency personnel who propose to remove copies of Records from the Peace Corps prior to their departure;
- (f) Ensuring that employees complete the Records requirement(s) of the Office of Human Resources’ (OHR’s) “Employee Exit Form;”
- (g) Conducting Peace Corps business only on agency EM accounts, except in rare occurrences. If sending or receiving a Record using a non-official EM account, they are responsible for copying or forwarding a complete copy of the EM Record to an official EM account or other approved Recordkeeping System not later than 20 days after the original creation or transmission of the Record;
- (h) Appointing a Records Liaison (RL), who must be a Peace Corps agency personnel member and may not be an intern or volunteer, to work with the office and the RMO to ensure Records Management compliance, and notifying the Agency Records Officer of the appointment of any new RL through the Records Inbox – records@peacecorps.gov;

- (i) Ensuring that all agency personnel complete Records Management training within 60 days of employment or arrival at the agency and complete annual refresher training thereafter;
- (j) Ensuring that all agency personnel who are teleworking or working remotely follow agency Records requirements to capture, safeguard, and store all agency Records in the appropriate electronic location, electronic information system (EIS), or designated storage cabinets for physical Records; limit access to Records printed out or carried to alternate work sites; and securely return or destroy, if appropriate, all copies of agency Records stored at alternate work sites;
- (k) Ensuring that all agency personnel in each office participate in the Annual File Plan and Records Clean-Up each year and are compliant with federal regulations regarding the timely Disposition of all Records according to their DAs;
- (l) Notifying the RMO of any new types of Records the office is creating or receiving for the Scheduling Process;
- (m) Ensuring that RLs, or other designated agency personnel, coordinate with and provide access to the Agency Records Officer and the RMO to conduct formal and/or ad hoc inspections and evaluations of office Records, regardless of location or format, for the purposes of measuring the effectiveness of Records Management programs and practices, and ensuring compliance with federal regulations.

5.6 Records Liaisons

RLs perform the following duties to assist their office and the RMO:

- (a) Advise their office on Records Management questions and issues;
- (b) Attend Records Management trainings and meetings and communicate information to their office;
- (c) Coordinate distribution, completion, and return of File Plans to the RMO during the Annual File Plan and Records Clean-Up;
- (d) Work with the RMO on Transfers of paper Records to off-site storage and Permanent Records to NARA; and
- (e) Coordinate Records Management discussions with the RMO to resolve office Records Management issues.

5.7 All Agency Personnel

All agency personnel are responsible for:

- (a) Maintaining Records in accordance with the established File Plans and Records schedules;
- (b) Notifying their Office Director of any new types of Records they are creating or receiving for the Scheduling Process;

- (c) Reporting any unauthorized destruction or loss of Records to their immediate supervisor and to the Agency Records Officer;
- (d) Protecting PII in accordance with the provisions of the Privacy Act and MS 897 *Privacy Act Administration*;
- (e) Ensuring that Records Management training is completed within 60 days of employment or arrival at the agency and annual refresher training is completed thereafter;
- (f) Conducting Peace Corps business only on agency EM accounts and systems, except in rare occurrences. If sending or receiving a Record using a non-official EM account, they are responsible for copying or forwarding a complete copy of the EM Record to an official EM account or other approved Recordkeeping System not later than 20 days after the original creation or transmission of the Record;
- (g) Maintaining, to the greatest extent possible, all agency Records in electronic formats and as required by federal regulations. Hard copy paper documents that do not show a date of June 30, 2024 or later are assumed to be, by the RMO, a Non-Record convenience copy of the electronic version of the Record, which is considered the official Recordkeeping copy. The paper copies may therefore be disposed of;
- (h) Maintaining and retaining Records in the appropriate electronic location, or designated storage cabinets for physical Records, so that Records are available when needed, where needed, and in a usable format to conduct agency business;
- (i) Keeping agency Records separate from Non-Records and personal Records (e.g., copies of personal timesheets, family photographs);
- (j) Ensuring that electronic Records are not stored on the “U Drive” or “C Drive” (i.e., directly on the hard drive) of a government-issued laptop and that agency Records are stored in the appropriate electronic location or approved EIS;
- (k) Understanding that all agency personnel EMs, sent or received, and all calendar entries are captured by the Office of the Chief Information Officer (OCIO) and maintained for seven (7) years after their Peace Corps term of appointment ends, at which time those Records are deleted/destroyed, except for Capstone Officials whose EMs and calendars are kept for 15 years after their Peace Corps term of appointment ends and then Transferred to NARA for eventual review and release to researchers;
- (l) Ensuring that data/Records sharing with others, inside and outside of the agency is appropriate, especially if planning to share data/Records outside of the agency. Agency personnel should consult with the Peace Corps’ Privacy Officer if there are questions about sharing data – privacy@peacecorps.gov; and
- (m) When teleworking or working remotely, capturing all agency Records in the appropriate electronic location, or designated storage cabinets for physical Records; limiting access to Records printed out or carried to alternate work sites; and ensuring secure return or destruction, if appropriate, of all copies of agency Records stored at alternate work sites.

6.0 Policies

6.1 Government Ownership of Records

All information received, created, or compiled by agency personnel in the conduct of their official duties, and information obtained under contract, are Records and are the property of the U.S. government.

No agency personnel have any personal or property right to official Peace Corps Records.

Federal law prohibits the unlawful destruction, removal, and concealment of Records. The only disclosures of personal information permitted are those set forth in the Privacy Act and in the Peace Corps' Privacy Act Systems of Records Notices.

6.2 Recordkeeping Requirements

The following required standards are required to ensure that adequate Records are created and preserved:

- (a) Peace Corps Records shall be complete in order to facilitate action by an incumbent and their successor. The Records must pass the scrutiny of the Congress, other authorized agencies of the U.S. government, and other persons directly concerned. Additionally, the Records must protect the financial and legal rights affected by the U.S. government's actions.
- (b) Peace Corps officials shall incorporate all essential information of their official actions into agency Records. Significant decisions and commitments reached orally (person to person, by telephone, or in conference) shall be documented and included in the Record. Minutes shall be taken at important committee and office meetings and these, together with a copy of the agenda and documents considered at or resulting from these meetings, shall be made part of the Record.
- (c) The programs, policies, and procedures of the Peace Corps shall be adequately documented in appropriate directives. A Record copy of each directive (including those superseded) shall be maintained as part of Peace Corps Records, which shall include saving final documents to the appropriate electronic location, or designated storage cabinets for physical Records, and not solely as an attachment to an EM.
- (d) All Records created or received by the agency for business purposes must, to the greatest extent possible, be maintained electronically for the approved Records retention in the appropriate electronic location. Printing an electronic Record to create a physical version is no longer an acceptable Records Management practice.
- (e) Administrators of EISs must select appropriate media and systems for storing agency Records throughout their Life Cycle, which meet the following requirements:
 - (1) Records are easily retrieved in a timely fashion and kept secure during use and storage;

- (2) Records storage facilitates the distinction between Record and Non-Record Material;
 - (3) Records are in a usable format until their Retention Limit as authorized by their DA is met;
 - (4) Permanent records, prior to their Transfer to NARA, have been converted to an acceptable medium that meets the Transfer requirements in effect at the time of Transfer;
 - (5) The use of USB drives or external hard drives (which are not backed up) has been avoided for long-term storage of agency Records;
 - (6) All external hard drives and media containing agency Records have been clearly labeled with office name, document type, and date range, and an index to the Records as the first document in each electronic folder; and
 - (7) All external drives that contain Peace Corps Records have been encrypted, and the passwords to unlock the drives are securely maintained and passed onto successor agency personnel.
- (f) EMs from either a personal or Peace Corps issued device that documents substantive Peace Corps business (e.g., iPhone text messages, WhatsApp) are captured, copied, or exported to an appropriate Peace Corps electronic location. Specifically, a complete copy of such an EM, including metadata (e.g., sender/recipient information, date, and attachments) must be copied or forwarded to and captured in an official Peace Corps EM account not later than 20 days after the original creation or transmission of the Record;
- (g) Personal accounts are only to be used in exceptional circumstances. The use of non-Peace Corps issued EM accounts for official Peace Corps business is prohibited unless specifically authorized by an individual's supervisor during a disruption of Peace Corps information technology (IT) services (*see* the OCIO's "[Rules of Behavior for General Users](#)");
- (h) Whenever the agency automates a Recordkeeping System (paper to electronic), a new DA is created and approved unless the resulting electronic Records are already covered by existing DAs;
- (i) DAs approved for another independent agency, or a particular office within the Peace Corps, are not used by the Peace Corps, or another office within the Peace Corps. For example, within the Peace Corps, the Office of Volunteer Recruitment and Selection (VRS) may not use a DA approved for the Office of Safety and Security for fingerprints, because these offices create and use these Records for different purposes.

6.3 Private or Non-Records

Private or Non-Records shall be filed separately from the Records of the office. In cases where documentation of official business is received in personal accounts, that portion of the Record which pertains to official business shall be extracted and made a part of the Record.

6.4 Vendors and Contractors

Vendors and contractors often have custody of Peace Corps Records. In order to comply with federal law, the Peace Corps must ensure that:

- (a) Contractors performing federal government agency functions create and maintain Records that document agency activities. Agencies must specify in the contract government ownership and the delivery to the government of all Records necessary for the Adequate and Proper Documentation of contractor-operated agency activities and programs;
- (b) All Recordkeeping Requirements are met. All Records created for U.S. government use and delivered to, or under the legal control of, the U.S. government must be managed in accordance with federal law. In addition, electronic Records and background electronic data specified for delivery to the contracting agency must be accompanied by sufficient technical documentation to permit understanding and use of such Records and data; and
- (c) Records Retention Limits, metadata, and Disposition functionality are incorporated into the design, development, and implementation of new or revised Recordkeeping Systems.

6.5 Agency Personnel Departures and Copies of Records Removal/Non-Removal Certification

Agency Records are the property of the U.S. government and shall remain with the Peace Corps.

The Agency Records Officer, or in the absence of the Agency Records Officer, the Office of the General Counsel (OGC), has oversight responsibility for the removal of all copies of Records. Capstone Officials and agency personnel may be permitted to remove copies of Records that they have drafted, reviewed, or otherwise acted upon if they prepare an inventory of copies of Records proposed for removal and obtain approval for removal. Approval may be granted provided that removal of the copies of Records will not:

- (a) Diminish the Records of the agency;
- (b) Violate confidentiality required by national security, privacy, or other interests protected by law; or
- (c) Exceed normal administrative economies.

Agency personnel must understand that although copies may be in their possession, the content and Record copies of these documents remain Peace Corps and U.S. government property. Release of these documents or their contents is subject to the approval of the agency. Approval for release of agency documents must come from the Freedom of Information Act/Privacy Act Office (*see MS 893 Freedom of Information Act Administration and MS 897 Privacy Act Administration*).

6.5.1 Capstone Officials' Copies of Records Removal/Non-Removal

Prior to departure, Capstone Officials must:

- (a) Undergo a “Capstone Official Records Exit Briefing” facilitated by the Agency Records Officer, or in the absence of the Agency Records Officer, a designated attorney in OGC;
- (b) Complete the Records requirement(s) of OHR’s “Employee Exit Form;” and
- (c) If requesting to remove copies of Records, prepare an inventory of those copies and send Form PC-2168, along with the inventory, to the Agency Records Officer, or the designated attorney in OGC in the absence of the Agency Records Officer, for review. Approval will be granted if the removal of copies of Records complies with federal laws and regulations and meets the standards listed in subsection 6.4 of this Manual Section;

6.5.2 Non-Capstone Official Employees Copies of Records Removal

Prior to departure, employees who are not Capstone Officials, as defined in this Manual Section, and wish to remove copies of Records must:

- (a) Complete the Records requirement(s) of OHR’s “Employee Exit Form;” and
- (b) Prepare an inventory of the copies of Records requested for removal and send Form PC-2168, along with the inventory, to the Agency Records Officer, or the designated attorney, in OGC in the absence of the Agency Records Officer, for review. Approval will be granted if the removal of copies of Records complies with federal laws and regulations and meets the standards listed in subsection 6.4 of this Manual Section.

6.6 Creation/Receipt, Maintenance, Use of Records, and Final Disposition

6.6.1 All Offices – Records Procedures

Offices shall institute adequate Records Management controls over Records throughout their Life Cycle (creation/receipt, collection, maintenance, processing, use, storage, dissemination, disclosure, and Disposition) to ensure that Records are preserved to meet legal requirements. Procedures and legally approved Dispositions for complying with this requirement are set forth in in MS 892 Attachments A and B. Offices shall also follow the guidance for safeguarding specific types of Records set forth in various Manual Sections (*see MS 267 Volunteer Medical Records*, MS 405 *Classified National Security Information*, MS 893, and MS 897) and their supporting documents, as appropriate.

All agency Records should be created and maintained in an electronic format to the greatest extent possible. If an office or Post determines this is not possible, the Office Director or RL should contact the Agency Records Officer for their determination.

Paper Records should be kept to a minimum (e.g., required ‘wet’ signatures, local/country legal requirements for paper copies). Paper Records must be kept in labeled folders and drawers and

include the Record Series title and dates so that successor agency personnel can clearly identify Records and implement Disposition instructions.

Paper Records not adequately labeled and filed as described above will be assumed by the RMO to be a Non-Record convenience copy of the electronic version of the Record, which is the agency Record to maintain, and can therefore be disposed of at will.

Whenever paper Records are sent to off-site Records storage, Peace Corps offices must keep a detailed box list/index of all Records sent to off-site Records storage in order to facilitate Records retrieval for business use. The list(s)/index(es) must be maintained by the creating office until the Records have met their Retention Limit and are either destroyed or Transferred.

Electronic Records must be clearly named, and File titles should include the topic, date, and version number if more than one version exists.

All electronic Records in a system will be retrievable and usable for as long as needed to conduct agency business and for their NARA-approved Retention Limit. Where the Records must be retained beyond the planned life of the system, the agency will, in accordance with legal requirements, plan and budget for the migration of Records and their associated metadata to new storage media or formats to avoid loss due to media decay or technology obsolescence.

Drafts of Records should, generally, be deleted once the final version of a document is approved/signed. However, some Record Series include drafts, such as drafts of agency-level policy. These drafts must therefore be kept in accordance with their DA.

All offices must consider Records retention when upgrading an existing EIS. Records must be retained for their full legally approved retention. Any proposed changes to existing Disposition requirements shall be submitted in writing along with a justification statement to the Agency Records Officer for evaluation. The Agency Records Officer shall work with the office and NARA to ensure that Records are covered by a legally approved DA.

6.6.2 Post Openings and Records Management

When a Post is opened or re-opened, the Post must follow current Records Management guidance for requirements on how and where to store electronic Records in the appropriate electronic location, and physical Records in the designated storage cabinets. Posts must always refer to the most recent version of the Post File Plan (or current filing structure) and Attachment B, both of which are updated at least annually.

6.6.3 Closing a Post and Records Management

Upon the decision to close or suspend a Post, agency personnel at the Post will reach out to RMO to obtain and follow instructions in the most current version of the “Closing or Suspending a Post” Standard Operating Procedure (SOP). This SOP is available on the agency’s Intranet.

6.6.4 Unauthorized Destruction of Records

All Records have a DA and must be maintained until the Retention Limit has been met. Federal regulations require that the destruction, loss, damage, or alienation of Records (i.e., unauthorized removal of Records) from the agency must be reported to the RMO immediately upon discovery of loss/destruction. The RMO will work with the reporting office, and other offices as appropriate, to review events involving the loss/destruction of Records, file a report with NARA if required, and comply with any NARA follow-on guidance or instructions.

6.7 Disposition of Records

Offices shall ensure that Permanent Records are physically and legally Transferred to NARA according to their approved DA. Offices shall ensure that Temporary paper or hardcopy Records that are no longer needed for agency business, but are not yet eligible for deletion or destruction, shall be properly stored and maintained at a NARA-approved storage facility, in a RMO-approved physical agency space, or in agency-approved electronic storage. Temporary Records that have met their retention requirements must be promptly destroyed or deleted. Extended retention is not authorized unless approved by NARA through the Agency Records Officer. All offices must comply with retention requirements approved by the Archivist of the United States. Retention requirements for Peace Corps Records are contained in MS 892 Attachments A and B.

6.8 Telework or Remote Work Records Management

Agency personnel are responsible for proper maintenance and protection of Records regardless of format or their physical location. All Records Management requirements described in MS 892 apply to all agency personnel, whether working in-person, teleworking, or working remotely for Headquarters offices or Posts.

Agency personnel participating in telework or remote work are responsible for managing agency Records in the appropriate electronic location, or in a designated, secured storage location for physical Records.

Agency personnel teleworking or working remotely must ensure that data/Records sharing with others, inside and outside of the agency is appropriate, especially if planning to share data/Records outside of the agency. Agency personnel should consult with the Peace Corps' Privacy Officer if there are questions about sharing data – privacy@peacecorps.gov.

6.9 New Records

New offices must work with the Agency Records Officer and NARA within one year of a program's creation to ensure that Records created or received by the new office while conducting agency business are covered by an approved DA. Offices subject to reorganization or renaming do not need to contact the Agency Records Officer unless new functions are added and new Records are created that are not covered by the current approved Records schedule as listed in the most recent File Plan.

Any office creating Records, regardless of format, not covered by an approved Records schedule as noted in either Attachment A or Attachment B of this Manual Section, shall submit the

following information in writing to the Agency Records Officer within 60 days of creation or identification of Records for which a schedule has not previously been created:

- (a) A brief description of the Record and its intended use, including whether or not the Record contains PII, or is an Essential Record, classified, or determined to be CUI;
- (b) Annual accumulation in volume of Records;
- (c) Types of Records (i.e., forms, correspondence);
- (d) Filing method (i.e., alphabetical, numerical);
- (e) Approximate dates the Records cover and if they are ongoing;
- (f) Amount of time Records are needed for business purposes;
- (g) Any fiscal or legal considerations for the Records; and
- (h) Historical significance of the Record(s), if any.

6.10 Records Management Requirements Integration into Electronic Information Systems

Records Management functions, retention, and Disposition requirements should be fully incorporated into EIS life cycle processes and stages, including with respect to the design, development, implementation, and decommissioning of information systems, and particularly Internet resources, so that they include storage solutions and cloud-based services, such as software as a service, platform as a service, and infrastructure as a service.

The Agency Records Officer shall ensure that Records Management and archival requirements are integrated into the design, development, and implementation of all EISs. As part of the capital planning and systems development life cycle processes, the Agency Records Officer will ensure:

- (a) That Records Management controls are planned and implemented in the system;
- (b) That all Records in the system are retrievable and usable for as long as needed to conduct agency business (i.e., at least as long as their NARA-approved Retention Limit). Where Records are needed or required to be retained beyond the planned life of the system, the Chief Information Officer, in consultation with the RMO, will develop a plan and budget for the migration of Records and their associated metadata to new storage media or formats to avoid loss due to media decay or technology obsolescence;
- (c) The preservation and Transfer of Permanent Records to NARA in a format acceptable to NARA;

- (d) Provision of a standard interchange format (e.g., ASCII or XML) when needed to permit the exchange of electronic documents between offices using different software or operating systems;
- (e) The use of those types of Records Management controls needed to ensure that federal Records in EISs can provide Adequate and Proper Documentation of agency business for as long as the information is needed;
- (f) Controls are incorporated into the EIS or integrated into a Recordkeeping System that is external to the EIS itself, including those for reliability, authenticity, integrity, usability, content, context, structure, and security; and
- (g) EIS creates/captures basic metadata (i.e., name, date, title) for all electronic Records created or saved for agency business.

6.11 Records Inspections and Evaluations

The Agency Records Officer and the RMO will conduct formal inspections and evaluations of agency Records, regardless of location or format, to measure the effectiveness of Records Management programs and practices, and to ensure that the agency complies with NARA and other applicable Records Management regulations.

6.12 Essential Records Program

The Agency Records Officer shall advise the Continuity of Operations (COOP) Team and Peace Corps offices to assist in establishing and maintaining an Essential Records Program by:

- (a) Specifying agency personnel responsibilities;
- (b) Informing all agency personnel about Essential Records;
- (c) Ensuring that the designation of Essential Records is current and complete; and
- (d) Ensuring that Essential Records are adequately protected, accessible, and immediately usable.

6.13 Records Holds/Freezes

Records under a Records Hold or Freeze (i.e., Records whose scheduled Disposition has been temporarily suspended because of special circumstances that alter the administrative, legal, or fiscal value of the Records) shall not be destroyed, deleted, or Transferred to NARA until the Records Hold/Freeze is lifted by OGC.

6.14 Use of the General Records Schedules

Records covered by NARA's GRS Disposition instructions must be maintained in accordance with those instructions unless NARA grants the agency an exemption. The RMO will disseminate, and the Peace Corps will implement, new and revised GRS Disposition authorities

within six (6) months of issuance by NARA. All GRS updates will also be added to Peace Corps File Plans and to MS 892 Attachments A and B.

6.15 Contracts and Agreements

The Agency Records Officer shall advise the Office of the Chief Financial Officer (OCFO) and the Office of Acquisition and Contract Management (OACM) concerning integrating Records Management obligations into their existing and new procurement processes. All agency contracts shall contain the most current Records Management language recommended by NARA at <https://www.archives.gov/records-mgmt/policy/records-mgmt-language>.

7.0 Effective Date

This Manual Section takes effect on the date of issuance.