

MS 892 Records Management

Effective Date: November 9, 2020

Responsible Office: Office of Management (M)/Office of Records Management

Supersedes: 10/13/2016; 1/28/13; 3/27/08; 11/17/93; 4/17/91; 7/13/83

Issuance Memo

Issuance Memo (01/28/2013)

Issuance Memo (10/13/2016)

Issuance Memo (11/09/2020)

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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, Office of Management and Budget Circular No. A-130, and Office of Management and Budget Memoranda M-12-18 and M-19-21; Federal Continuity Directive (FCD) 1.

2.0 Purpose

This Manual Section sets out the policies for administering Peace Corps' records management program.

3.0 Applicability

Federal law requires that the head of each Federal Agency make and preserve records containing adequate and proper documentation of the organization. This Manual Section applies to all records created or received by the Agency both domestically and overseas in the course of Agency business regardless of format. The policies within this Manual Section cover the creation/use, maintenance, retention, storage, and disposition of all Agency records regardless of format.

4.0 Definitions

As used in this Manual Section the following terms shall have the meanings as set forth in this Section 4.0:

4.1 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.

4.2 Attachment A – *Guide to Peace Corps Records Schedules (Headquarters and Recruiting Offices)* and Attachment B – *Guide to Peace Corps Records Schedules (Post)* are supporting attachments of MS 892 that contain descriptions of and legally approved disposition instructions for Peace Corps records. Attachments A and B are updated annually to reflect changes to the agency's records schedules.

4.3 Capstone Officials are those senior officials whose emails have been deemed to have historical significance and will be accessioned to the National Archives and Records Administration (NARA) for permanent preservation. They include the head of the Agency; principal assistants to the head of the Agency, such as Associate Directors; 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; principal regional officials, Regional Directors; and roles or positions that routinely provide advice and oversight to the Agency, including General Counsel, Chief of Staff, and Inspector General. Additionally, an individual serving in any of the above positions in an acting capacity for more than 60 days is considered a Capstone Official.

4.4 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.

4.5 Disposition Authority means the legal approval empowering an Agency to transfer permanent records to NARA or to carry out the disposal of temporary records.

4.6 Disposition (Instruction) means action taken regarding the legally approved disposition 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.

4.7 Essential Records include the identification, protection, and ready availability of information systems and applications, electronic and hardcopy documents, references, and records needed to support essential Agency functions during a continuity event.

Included are those records that are needed to perform the most critical functions of the Agency and those needed to protect legal and financial rights of the United States Government and of the persons affected by its actions.

4.8 File means an arrangement of records. The term is used to denote any recorded information regardless of physical form or characteristics, accumulated in any type of storage space or arrangement.

4.9 File Plan is the document that contains the title, description, disposition authority, mandatory retention instructions, and location of all identified records held in an office.

4.10 Freeze/Hold indicate records whose scheduled disposition has been temporarily suspended because of special circumstances that alter the administrative, legal, or fiscal value of the records.

4.11 General Records Schedules (GRS) is the set of schedules issued by the Archivist of the United States to provide agencies with disposition authority 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.

4.12 Life cycle means the three basic stages in the life of a record: creation or receipt, maintenance and use, and disposition (what happens to the record at the end of its active and inactive life).

4.13 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.

4.14 Non-record materials are Federally-owned informational materials that do not meet the statutory definition of records. These materials are 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.

4.15 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 in 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 period until transferred to NARA.

4.16 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.

4.17 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.

4.18 Recordkeeping system is a manual or automated system in which records are collected, organized, and categorized to facilitate their preservation, retrieval, use, and disposition.

4.19 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.

4.20 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.

4.21 Records schedule or schedule means a legal directive containing the records' descriptions and disposition instructions. (Also called “records control schedules” or “DAA”.) Records schedules authorize the amount of time records must be retained, the destruction of temporary records, or the transfer of permanent records to NARA.

4.22 Retention means the length of time, for active and inactive use of the records, that NARA has determined an Agency must maintain records in order to meet Agency legal and business requirements.

4.23 Scheduling process involves the actions needed for records that do not already have an approved disposition authority. Those records are reviewed by the Agency Records Officer and described with details including: creating office, date of initial creation, use, access restrictions, volume, retention, and value (temporary or permanent). That information is provided to NARA for approval. When requesting a ‘temporary’ value for records, NARA must alert the public through the Federal Register that the records will eventually be destroyed. Permanent records are eventually transferred to NARA when the retention has been met.

4.24 Temporary records means a record approved by NARA for disposal (destruction) after a specified retention period.

4.25 Unscheduled records means a Federal record whose final disposition has not been approved by NARA. Unscheduled records must be treated as permanent until a disposition authority is approved.

5.0 Responsibilities

5.1 Associate Director for Management

The Associate Director for Management 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;
- (d) Serving as the Senior Agency Official for Records Management (SAORM); and
- (e) 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 Review process.

5.2 Peace Corps Agency Records Officer

The Peace Corps Agency Records Officer is responsible for:

- (a) Establishing and maintaining an active, continuing records management program that complies with NARA 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;
- (d) Establishing safeguards against removal or loss of records;
- (e) Assuring that Attachment A – *Guide to Peace Corps Records Schedules (Headquarters and Recruiting Offices)* and Attachment B - *Guide to Peace Corps Records Schedules (Post)* reflect current Federal laws and regulations;
- (f) Briefing Capstone officials 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; and
- (g) Providing targeted records management training to political appointees, senior Agency officials, and senior executives upon their arrival at and departure from the Agency, and within three to six months prior to a potential change of presidential administration.

5.3 Capstone Officials

Capstone Officials are responsible for:

- (a) Receiving an incoming records management briefing from the Agency Records Officer;
- (b) Properly maintaining all Agency email accounts that they manage and any email accounts managed on their behalf by other staff, such as personal assistants, confidential assistants, or administrative assistants;
- (c) Conducting Peace Corps business only on Agency email accounts, except in rare occurrences. If sending or receiving a record using a non-official electronic messaging account, they are responsible for copying or forwarding a complete copy of the email record to an official email account or other approved recordkeeping system not later than 20 days after the original creation or transmission of the record;
- (d) Providing an inventory of proposed copies of records for removal to the Agency Records Officer prior to their departure briefing;
- (e) Completing and submitting Copies of Records Removal/Non-Removal Certification (form PC-2168); and
- (f) Receiving an outgoing briefing from the Agency Records Officer prior to departure from the Peace Corps.

5.4 Office Directors

Office Directors (including Associate Directors, Regional Directors, Country Directors, and Staff Office Heads) are responsible for:

- (a) Administering the Agency's records management program within their area of responsibility;
- (b) Ensuring that all staff who report to them are aware of their records management responsibilities, and make resources such as Attachment A – *Guide to Peace Corps Records Schedules (Headquarters and Recruiting Offices)* and Attachment B - *Guide to Peace Corps Records Schedules (Post)* available;
- (c) Coordinating the office's recordkeeping with the Peace Corps Agency Records Officer, including notification regarding any new types of records the office may be creating;
- (d) Reporting any unauthorized destruction or loss of records to the Agency Records Officer;
- (e) Reviewing the inventory and actual record copies, if necessary, of any staff member who proposes to remove copies of records from the Peace Corps, completing a Copies of Records Removal/Non-Removal Certification (form PC-2168), and forwarding a copy of that Certification and inventory to the Records Management Office for approval/disapproval;
- (f) Conducting Peace Corps business only on Agency email accounts, except in rare occurrences. If sending or receiving a record using a non-official electronic messaging account, they are responsible for copying or forwarding a complete copy of the email record to an official email account or other approved recordkeeping system not later than 20 days after the original creation or transmission of the record;
- (g) Appointing a Records Liaison to work with the program office and the Peace Corps Records Management Office to ensure records management compliance; and
- (h) Ensuring that all Agency personnel, which includes Federal employees, 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 must complete records management training within 60 days of employment or arrival at the Agency and must complete annual refresher training.

5.5 All Agency Personnel

All Agency personnel (which includes Federal employees, 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) 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 proper scheduling;
- (c) Reporting any unauthorized destruction or loss of records to the Agency Records Officer;
- (d) Protecting personally identifiable information (PII) in accordance with the provisions of the Privacy Act and Manual Section 897;
- (e) Ensuring that records management training is completed within 60 days of employment or arrival at the Agency and mandatory completion of annual refresher training; and
- (f) Conducting Peace Corps business only on Agency email accounts, except in rare occurrences. If sending or receiving a record using a non-official electronic messaging account, they are responsible for copying or forwarding a complete copy of the email record to an official email account or other approved recordkeeping system not later than 20 days after the original creation or transmission of the record.

6.0 Policies

6.1 Government Ownership of Records

All information received, created, or compiled by the officers, employees, and contractors of the Peace Corps in the conduct of their official duties and information obtained under contract are records and are the property of the United States government.

No Peace Corps official or employee has 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 Peace Corps' Privacy Act Systems of Records Notices.

6.2 Documentation Standards

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 his/her 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 staff 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 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;
- (d) Electronic messages documenting Peace Corps business (e.g., Skype for Business, Blackberry or iPhone text messages, Google Voice, Twitter, Snapchat, WhatsApp, etc.) must be copied or exported to an approved Peace Corps recordkeeping system;
- (e) The use of personal accounts should only be used in exceptional circumstances. The use of non-Peace Corps issued email accounts for official Peace Corps business is prohibited unless specifically authorized by an individual's supervisor during a disruption of Peace Corps email service (see IPS 1-17 *Information Security Program* for Rules of Behavior);
- (f) A complete copy of electronic messages (including metadata, such as sender/recipient information, date, and attachments) created under (d) or (e) above must be copied or forwarded to and captured in an official electronic messaging account of the officer or staff member not later than twenty (20) days after the original creation or transmission of the records;
- (g) Whenever the Agency automates a recordkeeping system (paper to electronic), a new disposition authority must be created and approved unless the resulting electronic records are already covered by existing disposition authorities; and
- (h) One department or independent Agency must not apply disposition authorities approved for another Agency or office. For example, VRS cannot use a records item approved for the Office of Safety and Security (fingerprints) because they create and use records for different purposes. Additionally, the Peace Corps cannot use a disposition authority that was approved for the Department of State.

6.3 Private or Non-records

Private or non-official papers, shall at all times 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 Copies of Records Removal/Non-Removal Certification (form PC-2168)

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

The Peace Corps Agency Records Officer has oversight responsibility for the removal of all copies of records. Peace Corps Capstone officials and staff members 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, obtain approval for removal, and provided that removal 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.

Employees 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 Manual Sections 893 *Freedom of Information Act Administration* and 897 *Privacy Act Administration*).

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

Prior to departure, Capstone Officials must:

- (a) Undergo a records de-briefing from the Agency Records Officer, the General Counsel or designated attorneys in the Office of the General Counsel (Designee). Designees may conduct the de-briefing in the absence of the Agency Records Officer;
- (b) Complete Attachment C Copies of Records Removal/Non-Removal Certification (form PC-2168). This form must be signed whether or not the official requests the removal of copies of records; 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 their Designee 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 Section 6.4 of this Manual Section.

6.4.2 Non-Capstone Officials' Copies of Records Removal

Prior to departure, *non-Capstone staff members* who wish to remove copies of records must:

- (a) Complete Attachment C Copies of Records Removal/Non-Removal Certification (Form PC-2168); 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 their Designee 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 Section 6.4 of this Manual Section.

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

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 MS 892 *Records Management Procedures*, Attachment A – *Guide to Peace Corps Records Schedules (Headquarters and Recruiting Offices)*, and Attachment B – *Guide to Peace Corps Records Schedules (Post)*. Offices shall also follow the guidance for safeguarding specific types of records in various Manual Sections (see MS 267 *Volunteer Medical Records*; MS 405 *Classified National Security Information*; MS 893 *Freedom of Information Act Administration*; and MS 897 *Privacy Act Administration*).

6.6 Disposition of Records

Offices shall ensure that permanent records are physically and legally transferred to NARA according to their approved disposition authority. 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 Records Management Office-approved physical Agency space, or in Agency-approved electronic storage. Temporary records that have met their retention requirement(s) 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 Attachment A – *Guide to Peace Corps Records Schedules (Headquarters and Recruiting Offices)* and Attachment B - *Guide to Peace Corps Records Schedules (Post)*.

6.7 Records of Alternate Format

Employees are responsible for proper maintenance and protection of records regardless of format.

6.8 New Records

New program 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 program office while conducting Agency business are covered by an approved disposition authority. 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 personally identifiable information, or is essential, classified, or determined to be CUI, formerly called Sensitive But Unclassified (SBU);
- (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 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 program office and NARA to ensure that records are covered by a legally approved disposition authority;
- (h) Any fiscal or legal considerations for the records; and
- (i) Historical significance of the record(s), if any.

6.9 Records Management Requirements Integration into Electronic Information Systems

Records management functions, retention, and disposition requirements should be fully incorporated into electronic information systems 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 electronic information systems. 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 period). Where records are needed or required to be retained beyond the planned life of the system, the Chief Information Officer in consultation with the Records Management Office 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 transfer of permanent records 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 electronic information systems can provide adequate and proper documentation of Agency business for as long as the information is needed; and
- (f) Controls are incorporated into the electronic information system or integrated into a recordkeeping system that is external to the information system itself, including those for reliability, authenticity, integrity, usability, content, context, structure, and security.

6.10 Records Inspections and Evaluations

The Agency Records Officer and staff will conduct formal inspections and evaluations of Agency records to measure the effectiveness of records management programs and practices, and to ensure that they comply with NARA regulations.

6.11 Essential Records Program

The Agency Records Officer shall advise the Continuity of Operations (COOP) team and Peace Corps program offices to assist in establishing and maintaining an essential records program by:

- (a) Specifying Agency staff responsibilities;
- (b) Informing all staff 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.

6.12 Records Holds/Freezes

Records under a records hold or freeze (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 or deleted, or transferred to NARA.

6.13 Use of the General Records Schedules

Records covered by NARA's General Records Schedule (GRS) disposition instructions must be maintained in accordance with those instructions unless NARA grants the Agency an exemption. The Records Management Office will disseminate and the Peace Corps will implement new and revised General Records Schedule (GRS) disposition authorities within 6 months of issuance by NARA.

6.14 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.

7.0 Effective Date

This Manual Section takes effect on the date of issuance.