



OFFICE OF THE SECRETARY OF DEFENSE
1950 DEFENSE PENTAGON
WASHINGTON, DC 20301-1950

ADMINISTRATION AND
MANAGEMENT

March 16, 2011

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Reminder of Records Management Responsibilities for Action Officers
(AOs)

References: (a) Records Management in the Office of the Secretary of Defense
Inspection Report, December 2010
(b) Administrative Instruction 15, Vol. I, "Office of the Secretary of Defense
(OSD) Records Management Program-Administrative Procedures,
Change 1" April 18, 2008
(c) Administrative Instruction 15, Vol. II, "Office of the Secretary of Defense
(OSD) Records Management Program-Records Disposition Schedule,"
April 18, 2008

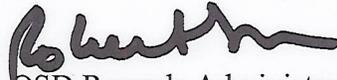
This memorandum serves to reinforce your awareness of the OSD policy regarding the management and proper disposition of working files. The National Archives and Records Administration Inspection Report identified in its findings that OSD employees, specifically AOs, were incorrectly treating supporting documentation as non-record working files. Administrative Instruction (AI) 15, Volume I (reference (b)) requires working files be managed as records when they are circulated for official purposes and when they contain unique information that adds to a proper understanding of OSD's decision-making process or execution of basic policies, decisions, actions, and responsibilities (see Attachment 1: Is it a Record).

Agency employees and contractor personnel conducting government business are responsible for making and keeping records of their work in accordance with the AI 15, Volume II (Reference (c)). AO's are to ensure that supporting documentation is maintained in accordance with the Reference (c). Supporting documentation includes emails, memoranda, concurrences, comments, briefings, spreadsheets, articles, drafts, etc. used in the formulation of policies or conduct of business. Supporting documentation of a substantive nature should be filed and maintained with the applicable record copy (see Attachment 2: Definitions). Routine background materials accumulated in the process of conducting business can be filed under one of the following file numbers in Reference (c):

- (1) 103-01.3. Routine background materials accumulated in the course of formulating or analyzing policy.
- (2) 103-08.1. Notes, drafts, feeder reports, news clippings, similar working papers, and other materials accumulated for preparation of a communication, a study, an investigation, a survey, an inspection, or other action.

- (3) 103-08.5. Extra copies of documents maintained by action officers that reflect actions taken by the action officer.

Additional reference type file numbers can be located in Reference (c) based on the function they document. Guidance on managing records is available from your Component Records Management Officer and Washington Headquarters Services, Records and Declassification Division. Points of contact are Ms. Luz Ortiz, OSD/WHS Records Manager (703) 588-6838 and Mr. Ronald McCully, Electronic Records Manager (703) 588-6835.


OSD Records Administrator

Attachments:
As stated

Distribution:

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Office of the President, Defense Acquisition University
Office of the Special Inspector General for Iraq Reconstruction
Office of the Appointing Authority, Office of Military Commission
Office of the Director, Joint Improvised Explosive Device Defeat Organization
(ATTN: Records Managers)

ATTACHMENT 1: IS IT A RECORD?

1. It is a Record if:

- a) It is identified in AI 15, Volume II or NARA's General Records Schedule;
- b) The information was received and/or created by an agency employee (includes contractors) on agency time to facilitate agency business, to include telework;
- c) It documents substantive information about agency business;
- d) The information is maintained and controlled by the agency;
- e) The information was distributed and used by employee's to conduct agency business;
- f) It required action, supports your area of work, or provides specific instruction;
- g) It documents what happened, what advice was provided, who was involved, order of events, and decision-making process; and,
- h) If it contains information restricted from release under the Privacy Act of 1974, preservation order, or an on-going investigation.

2. It is an E-mail record if it:

- a) Was made or received to conduct or respond to Agency business;
- b) Provides information of value on important Agency activities;
- c) Documents significant Agency decisions or adds to the proper understanding of Agency operations and responsibilities;
- d) Provides key substantive comments on draft memoranda;
- e) Documents the formulation and execution of basic policies and decisions and the taking of necessary actions;
- f) Documents important meetings;
- g) Will facilitate action by agency officials and their successors;
- h) Makes possible a proper scrutiny by the Congress or by duly authorized agencies of the Government; and
- i) Protects the financial, legal, and other rights of the Government and of persons directly affected by the Government's actions.

Note: Not all records warrant long-term or permanent preservation, to include email. The user (creator and recipient), especially for e-mail records, must identify those emails received/sent that meet the definition of a record. Record e-mails must be accessible and maintained for the time specified in AI 15, Volume II, in a format that complies with DoD and Federal policies (see AI 15, Volume I.) E-mail systems are not authorized recordkeeping systems.

ATTACHMENT 2: DEFINITIONS.

Federal Records (also called official records). All books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an Agency of the U.S. Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that Agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them (44 USC section 3301).

Nonrecord Material. Material not usually included within the definition of Records, such as extra copies of documents, but only if the sole reason such copies are preserved is for convenience of reference; library and museum material, but only if such material is made or acquired and preserved solely for reference or exhibition purposes; and stocks of publications. This latter category does not include record sets of publications, posters, and maps that serve as evidence of Agency activities and have value for the information they contain. Nonrecord material existing in offices must also be managed. .

Record Copy. The official, or file, or coordination copy created by an action office, complete with coordinations, enclosures, or related background papers that form a complete file or history of that action.

Reference Copies. A collection of extra copies of official records on a specific action used for ready reference.

Working files. (1) Documents such as rough notes, calculations, or drafts assembled or created and used in the preparation or analysis of other documents. (2) In electronic records, temporary files in auxiliary storage. An accumulation of working files may also include nonrecord material and technical reference files. Federal regulation requires working files and similar materials to be maintained as records, for purposes of adequate and proper documentation, if:

- (a) They were circulated or made available to employees, other than the creator, for official purposes such as approval, comment, action, recommendation, follow-up, or to communicate with agency staff about agency business; and
- (b) They contain unique information, such as substantive annotations or comments that adds to a proper understanding of the agency's formulation and execution of basic policies, decisions, actions, or responsibilities. (see Record Copy)