ER 25-60-1

DEPARTMENT OF ARMY U.S. Army Corps of Engineers 441 G Street, NW Washington, DC 20314-1000

Regulation No. 25-60-1

2 December 2021

Information Management: Records Management RECORDS AND INFORMATION MANAGEMENT PROGRAM

- 1. This regulation establishes policies, responsibilities, and mandated procedures for managing the U.S. Army Corps of Engineers (USACE) Records and Information Management Program (RIMP). Policies and procedures will ensure that records are properly managed from creation and receipt through final disposition according to Federal Laws, regulations, Department of Defense (DoD) and Army recordkeeping requirements.
- 2. This regulation applies to all Headquarters USACE (HQUSACE) staff elements and USACE Divisions, Districts, Centers, Laboratories (Labs) and Field Operating Activities (FOA).
- 3. Distribution Statement. Approved for public release; distribution is unlimited.

FOR THE COMMANDER:

LLOYD.JOHN Digitally signed by LLOYD.JOHN.PHILLIP.1 021070595 070595 Date: 2022.01.04 12:51:41 -05:00'

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^{*}This regulation supersedes ER 25-60-1 dated 30 June 2015

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- 1. <u>Purpose</u>. This regulation establishes policies, responsibilities, and mandated procedures for managing the USACE RIMP. Policies and procedures will ensure that records are properly managed from creation and receipt through final disposition according to Federal Laws, regulations, DoD and Army recordkeeping requirements. The USACE RIMP supports and documents USACE mission accomplishments, day-to-day business needs and interaction with the public. Records ensure continuity and consistency in administration, assist officials and their successors in making informed decisions and provide information required by Congress and agencies that perform oversight functions. Records are retained to meet legal requirements and protect the rights and interests of the government and people who are affected by government actions and decisions. Records preserve the nation's history for future generations.
- 2. <u>Applicability</u>. This regulation applies to all Headquarters USACE staff elements and USACE Divisions, Districts, Centers, Labs and FOA's.
- 3. <u>Distribution Statement</u>. Approved for public release; distribution is unlimited.
- 4. <u>References</u>. See Appendix A.
- 5. Records Management (Recordkeeping) Requirements. The records management requirement for all records numbers, associated forms, and reports required by this regulation are addressed in the Army Records Retention Schedule Army (RRS-A). Detailed information for all related record numbers are found in the Army Records and Information Management System (ARIMS)/RRS-A at https://www.arims.army.mil.
- 6. <u>Availability.</u> Access this regulation on the official USACE publications web page at http://www.publications.usace.army.mil.

7. Program Objectives.

- a. Promote the life-cycle, maintenance, preservation, and informational integrity of all records that document the roles and activities of USACE. Establish internal policies, standards, criteria, and procedures in support of the USACE RIMP program.
- b. All USACE personnel will manage records stored in any media according to regulatory guidance, policy, and directives. Records are electronic files (for example, E-mail, Social Media, contracts, memos, charters, Standard Operating Procedures, etc.) or paper, containing data/information, which must be retained as evidence of a decision, action, or event. Apply all applicable life-cycle management instructions to all records, regardless of medium or classification. These actions ensure all USACE mission-essential records are available when and where needed in usable format.
- c. Preservation of all records required to protect the rights, interests, and accountability of USACE and its current and former members. All USACE employees will ensure those records containing Personally Identifiable Information (PII), Controlled Unclassified Information (CUI) and all classified records will be protected as per applicable regulations.

- d. Implement litigation actions as required by Headquarters Department of the Army (HQDA) Staff Judge Advocate or USACE Office of Counsel. Litigation actions will be enforced during the length of the litigation; records lifecycle actions will only be applied once the litigation action(s) have been lifted.
- e. Foster unity of effort on RIMP matters between Knowledge Management, Document Management, Cyber management, Emergency Management and all other stakeholders which affect the overall RIMP.

8. Responsibilities.

- a. HQUSACE Directors and USACE Division, District, Center, and FOA Commanders. HQUSACE and principal officials are the proponents for recordkeeping requirements necessary to conduct business in their functional areas. USACE principal officials will:
- (1) Enforce all records management actions within their scope of responsibility. Ensure the Records and Information Management Specialists (RIMS) and Information Technology (IT) Chiefs have the time and resources required to implement and oversee the program.
- (2) Maintain and manage information from creation or receipt through final disposition, according to Federal law and regulations, and Army recordkeeping requirements.
- (3) Ensure records retention and disposition requirements are clear, accurate, essential, current, and are contained in the publications governing how USACE conducts business in their functional areas.
- (4) Enforce records management concepts with pertinent USACE employees, even when not officially appointed to conduct records actions, and when using USACE electronic systems (including e-mail), or generate or receive paper documents, personnel are considered records custodians/end users. As such all personnel, at all levels, are responsible for managing the records they generate and receive according to this regulation.
- b. USACE Chief Information Officer. The Chief Information Officer (CIO) serves as the Senior Agency Official (SAO) and Archivist of USACE and the functional proponent for USACE RIMP. The CIO ensures that the USACE Records Officer (RO) will:
- (1) Develop and issue policy on records management practices for USACE and for those instances that USACE is designated executive agent with records management responsibilities.
- (2) Coordinate with HQDA General Counsel and Army CIO/G6 on issues related to records management as appropriate.
- c. The USACE RO serves as the USACE official responsible for overseeing the agency's RIMP. The USACE RO will:
 - (1) Represent USACE to all other Federal Agencies (General Services Administration,

National Archives (NARA)) for all records management actions. Represent USACE in interactions with the Army Records Management Directorate (RMD) to ensure RM activities and tasks are completed. Serves as the final decision authority when resolving records management conflicts between all parties.

- (2) Ensure that USACE has an up-to-date records management regulation. Ensure all other USACE regulations which affect the program contain appropriate RM guidance.
- (3) Ensure that recordkeeping requirements are established, implemented, and periodically updated for all offices, at all levels and for all record media, including electronic and other special records.
- (4) Advise and assist CIO/G6 Enterprise Records Management Team (ERMT) and RIMS in administering their Area of Responsibility (AORs) program. Ensure each group of personnel are knowledgeable on all RM policy, principles, and requirements.
- (5) Coordinate with ERMT Records Administrators (RAs) to ensure all USACE information systems incorporate records management functionality appropriate to the records and information assets they support.
- (6) Provide advice and guidance to command senior officials and staff on the creation, maintenance and use of records, electronic recordkeeping and e-mail systems. Ensure senior officials are trained in their Records Management duties within 30 days of assuming their position. RIMS will provide this training for their respective AOR.
- (7) Coordinate matters relating to records management with multiple USACE stakeholders such as the Freedom of Information Act (FOIA) official, Office of Counsel, Inspector General, Public Affairs Officer, Web manager, historian, system administrators, program managers etc. Additionally, coordinate with program managers responsible for special media, such as audiovisual records, cartographic and architectural records and social media records.
- (8) Perform yearly inspections throughout all of USACE to document the effectiveness and efficiency of the USACE RIMP. Districts will be inspected on a rotating basis after prior coordination. Results of the inspection will be provided to the appropriate official after each visit.
- (9) Convene, as deemed necessary, Records Management Work Groups comprised of agency records management representatives to address common records management issues and concerns.
- (10) Keeps abreast of policy and procedures for all sub-programs assigned to the mission such as Official Mail, Privacy Act, FOIA, Correspondence Management, Information Management Collections and Office Symbol Management.
- d. The USACE RAs. Each member of the ERMT will be appointed as an RA in ARIMS. As such, they will serve as the operational command authority for the RIMP policy interpretation

and procedural guidance and will:

- (1) Assist the USACE RO in preparing policy, guidance and advising USACE RIMS on program compliance and recordkeeping best practices.
- (2) Serve as the principal conduits for all RIMP policy. Provide advice, guidance, and instructions to RIMS command and regional employees and staff on records management activities and requirements, electronic recordkeeping to include e-mail records.
- (3) Register as an RA in ARIMS. Manage the ARIMS on-line (<u>www.arims.army.mil</u>) functions for USACE unit identification codes.
- (4) Maintain the master list and copy of appointment memos of all USACE RIMS, RAs, and have knowledge of where overall listing showing designation of records custodians (RCs) in their geographical AOR. Submit a copy of written appointment memos for RIMS and RA's via e-mail to <u>usarmy.belvoir.hqda-oaa-aha.mail.rmda-records@mail.mil</u>. Local RIMS will keep their RC's appointment memorandums.
- (5) Ensure RIMS receive basic Records Management and/or orientation training once hired into the position. Approve Office Records Lists (ORL's) when RIMS unable to complete the ORL review.
- (6) Ensure that recordkeeping requirements are established, implemented, and periodically updated for all offices at all levels and for all record media, including classified and other special records.
- (7) Maintain working knowledge of those electronic and automated systems in supported AOR, which create Federal records. Within these systems coordinate the scheduling and disposition of agency records; coordinate requirements between USACE RO, RIMS, RCs, Program Manager(s), and designee(s).
- (8) Periodically review agency records management program and records schedules, to ensure compliance with governing policy. Provide updates to specific audiences as required.
- (9) Notify the USACE proponents, through the RIMS, of the legal requirement to suspend routine deletion practices during a record freeze to ensure the preservation and retention of electronic and hardcopy records.
- (10) Instruct RIMS of their legal responsibility to report any actual or potential unlawful removal, change or destruction of records. Provide guidance on how to conduct actions (such as identify records and how to conduct searches) related to litigation holds and record freeze actions.
- e. Records and Information Management Specialists. RIMS Serve as the authorizing records management official (RMO) for the division, district, lab, center or FOA to which they are appointed, ensuring USACE, Army, and NARA policies and guidelines are applied and

incorporated into the day-to-day activities of the organization. The RIMS will:

- (1) Manage, oversee, and direct the records management program and its subprograms. Subprograms include Official Mail Management, Publications Management, Forms Management, Office Symbols, Privacy Act, Litigation procedures, and Correspondence Management.
- (2) Ensure office recordkeeping requirements are established, implemented, and periodically updated at all levels within organization and for all record media.
- (3) Register as a Records Manager (RM) in ARIMS (see website at https://www.arims.army.mil for registration instructions).
- (4) Coordinate with the RAs to assign and appoint a RC for each directorate, division, branch, or office within the command or organization. Oversees implementation of the records program with RC's on a daily basis. Initially train RC on their duties, with refresher training accomplished each year; keep a list of RC's and appointment memorandums.
- (5) Ensure the proper training of directorate, division, branch, and office employees (known as Records Custodians), and the proper briefing of the RIMP to command and senior managers.
- (6) Ensure and approve ORLs for all directorates and offices and folders are created in ARIMS. ORLs must identify the bucket number (200), and then when used to create folders, use the assigned Records number (1x) for all office records. Validate each office has identified Essential Records on the ORL and in all applicable filing systems; provide listing to appropriate Continuity of Operations Program (COOP) personnel for their AOR.
- (7) Identify to RA and RO issues that impact the RIMP. Issues may come from FOIA, Office of Counsel, USACE Inspector General, Public Affairs Officer, Web manager, USACE historian, system administrators, program managers, as well as program managers responsible for special media, such as audiovisual records, cartographic and architectural records, social media and printed records.
- (8) Work with all supported personnel to ensure the transfer of eligible electronic records to ARIMS, ensure the prompt disposal of temporary records in all Electronic Information Systems (EIS) or shared drives, Teams etc., when their retention periods expire.
 - (9) Conduct yearly evaluations of records management activities within the organization.
- (10) Liaison with and provide advice and assistance to security managers in developing and executing a program to reduce classified records holdings to the absolute minimum required.
- (11) Serve as the Official Mail Manager for the District (OMM), ensures safety and security of mail facilities as appropriate and records generated in this area are identified and are handled appropriately according to ARIMS disposition schedule and AR 25-51.

- f. RCs. Each directorate within the command, division, district, labs, centers, and FOAs will designate an RC to be responsible for records management matters of the directorate or office and will comply with guidance issued by the RIMS. The RC has the following responsibilities:
- (1) Ensures that all directorates, divisions, branches, and offices records are listed in an approved ORL and are described accurately. Ensure folders are created in ARIMS when completing ORLs. Ensure all Essential Records are identified during the ORL process; provide list of essential records to appropriate COOP personnel.
- (2) Ensures that records management processes and procedures are implemented and incorporated within each supported mission. Review and oversee program to ensure staff are applying the policies to capture and safeguard all records, regardless of media or classification. Ensure records custodians are properly trained in all RIMP sub-programs.
- (3) Works with the RIMS and/or RA (when necessary) on records identification, preservation and disposal. Additionally, conducts periodic assessment of the directorate and office's records programs.
- (4) Respond to record holds (also known as Litigation or Records Freeze) by notifying the Records Hold point of contact (POC) (appropriate legal office) as to whether the custodian has responsive records and preserve documents subject to the records hold, according to the Records Hold directions.
- (5) Follows approved records retention schedule to ensure the proper disposition of the office's records. This includes deletion of temporary records at the end of their life-cycle; as well as retiring records to ARIMS at the end of their life-cycle.
- (6) Instructs and reminds the staff not to mix personal papers and non-record materials with official records, and not to remove records from the office without proper authorization.
- (7) Assists the office staff and program managers in implementing procedures to prevent departing employees from destroying ineligible records or removing records from office's custody. Records identified as responsive to a legal hold notice must be identified to the RIMS for transfer to a secure location for further preservation.
- g. USACE Employees (also known as RCs and End Users). Employees have three basic obligations regarding USACE records:
- (1) Identify program functions and activities and determine what records are needed to document those activities and functions. Create records that you and others need to do the business of USACE. Maintain records in a way that allows all persons who need access to find and retrieve what they need.
- (2) Assist appointed RC within your office in the creation of the ORL to be used by all office personnel.

- (3) Carry out the disposition of records under your control according to agency records schedules and Federal regulations annotated on the office ORL.
 - (4) Keep official records separate from non-record materials.
 - (5) Protect essential records appropriate to their value.
- (6) Protect records that contain security classified, confidential business, or other types of sensitive information with appropriate safeguards.
- (7) Remove or destroy records only with authorization as outlined on the office ORL. Do not retain records authorized for destruction past their destruction timeframe; this opens USACE to financial liability and/or possible invasion of privacy.
- (8) Before departing any USACE office, review all records and data, and save and transfer to appropriate records system (ARIMS) or SharePoint site. Preserve and notify records hold POC (legal) if they have records responsive and subject to a record hold.
- 9. <u>Records Management Program Overview</u>. Records management is the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to record information creation, maintenance, and disposition. Records management significantly contributes to the smooth operation of the Army's programs by making information readily available when needed for effective decision. Records Management:
- a. Protects the rights of USACE, its employees, and its customers. Documents all missions of USACE for legal, fiscal and historical purposes.
 - b. Protects records from inappropriate and unauthorized access, use or destruction.
- c. Provides continuity in the event of a disaster, via the Essential Records program. Ensures coordination with COOP activities.

10. Records Defined.

- a. Records document USACE's business and can be found in all media formats such as paper, e-mail, instant messaging, text messages, telephone messages, voice mail messages, presentations, websites, social media (for examples, Facebook, Twitter, Instagram, Youtube, etc.), word processing documents, spreadsheets, and EISs, regardless of classification. Records follow a life-cycle known as creation, maintenance and use and destruction. Records must be kept appropriately during all phases of the life-cycle.
- b. As defined in the Federal Records Act of 1950, as amended, the term "records" includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of 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 Federal Government or because of the informational value of data in them.

- c. The term "records" does not include library and museum material made or acquired and preserved solely for reference or exhibition purposes or duplicate copies of records preserved only for convenience.
- d. Determining whether a particular document is a record does not depend on whether it is an original or a copy or classification. Several copies of a single document may each be a record copy because:
 - (1) Each serves a separate administrative purpose.
 - (2) They are maintained separately with other relevant records.
 - (3) A record may be active or inactive.
- (a) Active records. Active records are found in multiple areas such as e-mail, MS Teams, SharePoint, electronic information systems, and when in paper within a central filing area/office filing cabinet.
- (b) Inactive records. Records that are no longer used in the day-to-day course of business, but that may be preserved and occasionally used for legal, historical, or operational purposes. Once no longer needed to conduct business these should be retired or destroyed based on the timeframe identified on the approved office ORL.
 - (4) Records may be temporary or permanent.
- (a) Temporary records (all records other than permanent). Records that may be destroyed at the timeframe identified on the office ORL. The majority of the Army's records are temporary.
- (b) Permanent records. Records determined by NARA to have sufficient historical value and MUST NEVER be destroyed. They require special care and handling and must be transferred to NARA's ownership to preserve forever once they are no longer needed for business purposes. USACE offices will transfer these records to ARIMS when no longer needed for day-to-day business at any point during the year.
- (c) Some records are identified as non-records and are identified as drafts, working copies or reference material. Users should remove these materials on a regular basis to assist in storage management.

Note. When drafts that reflect significant changes in how and why recommendations are made to or by the decision maker will be retained as supporting documentation to the official record.

11. Record Keeping Requirements and Procedures. All offices in USACE will implement these

requirements as identified within the ORL. All offices will file, keep, and then retire or destroy records as per the disposition instructions annotated. Offices may find these dispositions are no longer accurate and should then coordinate updates to the dispositions with their local RC/RIMS personnel. Some records are considered Unscheduled (meaning they are not annotated in the ARIMS Army Consolidated Records Schedule (ACRS)). These will be brought to the attention of the local RIMS for further action. Once identified no destruction of the records will be authorized until instructions are published in ARIMS. All offices will identify and protect their essential records from inadvertent deletion or corruption.

12. Office Records Lists Development.

a. ORLs are required and will be created annually in ARIMS. ORLs are used to identify all records created within each office and identify all essential records in each office. Long-term and permanent records will be filed in the Army Electronic Archive (AEA) via the ORL for eventual retirement or transfer See Figure 1.

RECORDS MANAGEMENT - ORL SUMMARY

ENDIST CHARLESTON-W2SR01

ACOM/ASCC/DRU: USACE ORL Name: CORPORATE COMMUNICATIONS

Unit Name - UIC:ENDIST CHARLESTON - W2SR01ORL Year:2013Office Symbol:CESAC-PADate Created:1/9/2013

Created By:

Record Sub-series	Record Number	Retention Period	Privacy Act	<u>Status</u>
Administration	800A	0-6	N/A	Approved
Administration	800A	6+	N/A	Approved
Administration	800A	Perm	N/A	Approved
Administration	800D	0-6	N/A	Approved
Legal	1000B	0-6	N/A	Approved

Close Print Summary

Figure 1 – Approved ORL

b. USACE RIMS will review ORLs annually, for accuracy and completeness and ensure that the ORLs adequately identify the organization's records. The status column on ORLs prepared using the RM-Assist is provided as a convenience and should be used to notify submitting offices or units of the progress or results of the review and if any changes are needed. No ORL's will be created using the "copy" function, all ORL's will be re-created on a yearly basis. ORL's will be updated no later than 30 day when missions change (such as offices merge, missions are moved to a new mission owner).

13. <u>Records Retention and Disposition</u>. Each record(s) retention and disposition are found in the office ORL; and must be followed as annotated. Exceptions will be sent to the USACE RO via

the local RIMS.

- a. Recordkeeping requirements during contingency operations are governed by the same laws and regulations as recordkeeping during peacetime or while in USACE. For contingency record requirements refer to DA PAM 25-403. Contingency operations are NOT Disaster recovery operations and the record keeping requirements for each are separate and distinct.
- b. Disaster Recovery Records are records created when USACE responds to both natural and manmade disasters. Examples are temporary roofing (blue roofs), housing, emergency power etc. Procedures for this record set can be found in EP 25-1-114.

14. Personal Papers.

- a. As defined by 36 CFR 1220.08, personal papers (also referred to as personal files) are documentary materials belonging to an individual that are not used to conduct agency business. Personal papers are excluded from the definition of Federal records and are not owned by the Government. Working copies are not personal papers and must be filed as per the office ORL. Senior Leaders must ensure they do not mix their personal papers with their office official papers. Personal papers generally fall into the following categories.
- (1) Materials accumulated before joining Government service that are not used to conduct Government business, such as personal reference material.
 - (2) Materials relating solely to a person's private affairs that do not relate to agency business.
- (3) Work related papers such as diaries, notes, and personal calendars that are not prepared, received, or used in the process of transacting official business.
 - b. See DA PAM 25-403 for additional information on personal papers.

15. Records Inspection.

- a. All personnel assigned RM duties are responsible for assessing the proper management of Army records in all media to protect the rights, assure government accountability, and preserve and make available records of permanent value. In this capacity, all Army records are subject to inspection to ensure compliance with Federal statutes and regulations. These individuals may inspect USACE records within their jurisdiction not to exceed their security access level.
- b. Those individuals without the level of access needed to inspect may request assistance of another appointed person within the USACE organization.
- c. If no individual meets the requirements, reach out to the servicing ERMT member for additional guidance.

16. Electronic Recordkeeping.

- a. USACE records, regardless of medium or classification, must follow the disposition instructions identified in ARIMS and comply with the security requirements of <u>AR 25-2</u>. Any electronic information generated by or contained in an information system (IS) or other information technology source, created or received during the conduct of business, must be preserved according to those instructions (or if unscheduled will be kept until guidance is received from local RIMS). This includes records contained in Division, District, Center or FOA unique systems, e-mail systems, systems maintained in the office environment, instant messaging, texting, and social media sites. The procedures for saving electronic records should be determined as early as possible in the life cycle of a system.
- b. Any copies of official records maintained on the user's system for reference purposes after transfer of the official copy may not be kept longer than the retention period approved for the record copy. Once moved to ARIMS or another official recordkeeping system, copies on the user's system may be deleted.
- 17. Army Records Information Management System. ARIMS is a web-based tool used to identify, arrange, manage, store, retrieve, and apply dispositions to Army record material. It is a portal to the RRS-A, the ACRS framework, the AEA and a software suite of tools to manage Army record information. It is based on the role of the user. ARIMS is accessed via the Army website at https://www.arims.army.mil. The ARIMS Quick Reference Guide provides user registration instructions and is located under "References" on the ARIMS home page. All new registrants are granted Action Officer level access. If the user is an RMO, authorization for the required level of access must be obtained from at least one level higher than the level requested in the records management chain of command. For example, an RC role must be approved by the servicing RIMS. Unclassified ARIMS will be accessed at this link: unclassified ARIMS Web site (https://www.arims.army.mil); classified (ARIMS-C) Web site (https://www.arims.army.smil.mil). Office(s) with classified records will create an ORL as outlined above. ARIMS is the only DoD authorized records management application for all USACE records.

18. Electronic E-mail

- a. E-mail is the electronic transfer of information typically in the form of electronic messages, memoranda, and attached documents from one party to another party via an intermediate telecommunications system. E-mail messages consist of the message header and message contents. The header contains the mailing address, routing instructions, transmission and receipt data, and other information the system needs to deliver the e-mail correctly. Most e-mail systems allow the attachment of documents to messages, importing text from word processing systems, forwarding messages, and distribution to individuals as well as groups and use of public key infrastructure technology. E-mail may also contain telephone message recordings from the Voice Over Internet Protocol telephone system.
- b. E-mail has become a major way of transacting Government business; however, e-mails may be destroyed prematurely when they are not perceived as official records. E-mail messages are official records when they are created or received in the transaction of public business and retained or appropriate for retention as evidence of policies, actions, decisions, or transactions.

c. Official records communicated through e-mail systems must be kept for seven years for all USACE individuals not occupying CAPSTONE identified billets. Senior leaders identified on the CAPSTONE form will have their e-mail automatically retained as permanent records. These records will be uploaded to the AEA at the end of each Senior Leader's tour with USACE.

Note. All non senior leader personnel are ultimately responsible for ensuring any e-mail which meets a permanent retention are saved appropriately.

d. Senior leaders (General Officers/Flag Officers, Senior Executive Services) are not authorized to use "non-official electronic messaging accounts" including personal e-mail account while conducting official business. If used, personnel will ensure that a complete copy of all e-mail records created and received with these accounts must be forwarded to an official electronic messaging account of the officer or employee no later than 20 days after the original creation of transmission of the record.

19. Planning New or Enhanced Information Systems.

- a. Any functional proponent (office of record) planning a new automated information system or enhancing (changing) an existing system, must ensure the retention of electronic records and associated documentation, and ensure access to the records, for as long as the USACE needs them as described in the records retention schedule. As with any medium (electronic, paper, etc.), the originator of a record does not determine when to destroy the record. All offices will follow the approved Army process to identify and report these systems into the Army Portfolio Management System by utilizing DA Form 7796. The USACE RO and RA will oversee this process for USACE. All proponents will:
- (1) Define electronic record information disposition instructions during the needs justification phase of information system planning, milestone, and review in the revalidation phase of each milestone in the life-cycle management of the system. All systems will apply records management metadata to all records within the system. Metadata will be identified during the planning stage. Place RM deletion role against all systems to ensure only authorized personnel are permanently deleting records.
- (2) Evaluate potential systems to determine the record information required for business purposes and validate the retention periods for that information according to the disposition instructions identified in ARIMS. Any new, revised, or rescinded requirements will be coordinated with the local RIMS and USACE RO, who will notify RMD.
- b. Whether an IS contains record information will be determined by reviewing the mission and functions statement of the office or offices supported by the system and evaluating the system's administrative, legal, or fiscal value. Also, a review of similar information already scheduled and identified in ARIMS may be useful. Within an IS, the record information may include individual transactions or the results of many transactions. When there are no systematic data outputs, a periodic snapshot of an entire database may serve as the record. Depending on the architecture of the system, the records may be collected and preserved in online, near line, or

offline storage while awaiting disposal or transfer to the AEA. Records designated as long-term that are complete may be transferred to the AEA immediately upon creation or collected in the IS and transferred periodically. Alternatively, these records may be retained and preserved within the IS for their entire life cycle, provided that they are identified in the master index of records within ARIMS. All permanent records will be transferred to ARIMS when no longer needed to conduct business.

- c. Information system documentation: Documentation on all IS that collect, store, process or deliver electronic records will be kept current according to applicable technical bulletins and standards. Therefore, the program managers, project managers and information managers will:
- (1) Ensure that all electronic records are accompanied by documentation sufficient to ascertain that the information is accessible and usable. Minimum documentation consists of identifying the software programs and operating systems used to create the documents to the extent that technical specifications, file arrangement, contents, coding and disposition requirements of the files can be determined. Program and system documentation must be maintained for as long as the related information is kept.
- (2) Ensure that documentation, to include a copy (or mirror image) of the software program, for IS containing or generating long-term records is transferred along with the related electronic records sent to the AEA, unless a prior transfer of the same information occurred and no changes were made. However, a statement to that effect will be included with the subsequent transfers to ensure that the information may be accessed and used.
 - (3) Review documentation to determine if it:
 - (a) Adequately specifies all technical characteristics necessary to read or process the records.
 - (b) Identifies all inputs and outputs of the system.
- (c) Provides an audit trail of changed or deleted information and the correct disposition of the information content and use.
 - (d) Defines the contents of the files and records.
 - (e) Clearly states the purpose and functions of the system.

20. Managing Records on Electronic Media.

a. Information created within USACE may be recorded on media in machine-readable format. Approved disposition schedules apply to all USACE recorded information, regardless of the medium upon which recorded. In order to protect the rights and interests of USACE and its members keep costs to a minimum, and serve the study of history, storage media for long-term records must be selected to best serve the operational needs of USACE and meet statutory scheduling requirements. These decisions are vital considerations in the design stage of the IS life cycle management.

- b. Electronic records require the same levels of protection as any other media. Proper management provides for economic, efficient, and reliable maintenance, retrieval, preservation, storage, and scheduled disposition of the information. All USACE personnel must comply with the Army records disposition schedules in ARIMS when disposing of or erasing media that stores the only copy or the official copy of the record.
- c. All media and systems selected to store and manage electronic records throughout their life-cycle must meet the requirements of AR 25-400-2, and DoD Instruction 5015.02. Ideally all records will be transferred to the AEA for long term preservation.

 Note. Only authorized personnel will delete records from the EIS. Record copies of long-term records (stored in or generated by an EIS or other information technology source) that are complete should be sent to the AEA as soon as practical for secure long-term storage. Original hardcopy source documents that are converted to electronic format (for example, by scanning) with permanent or unscheduled retentions must not be destroyed until approval is obtained from NARA.
- 21. <u>Social Media</u>. Social media refers to the various activities integrating web technology, social interaction, and user-generated content including social networks, photo libraries, and video sharing sites. Social media is used internally and externally to share information, support business processes, and connect people to government.
- a. Social media, when used in the conduct of Army business, may result in the creation of official record information and will be managed in compliance with records management laws, regulations, and policies. The Office of the Chief of Public Affairs posts a listing of authorized social media at http://www.army.mil/media/socialmedia/.
- b. USACE uses collaborative sites, such as MS Teams, or Intelink in the conduct of its mission, and therefore record content/information has been created through use of social media tools. If the content documents actions such as decisions, interactions with other agencies, plans, responsibilities, outcomes, or other aspects of the organization's mission, it must be captured, identified and managed as official record information. Offices will use ARIMS to determine the applicable record management guidance.
- c. Comments or other postings inconsistent with an organization's policies may require removal from the platform. Retain removed content according to ARIMS RRS-A disposition instructions.
- d. Organizations need to understand their responsibilities and obligations when dealing with social media providers and third parties.
- e. Each organization is responsible for managing its records, whether they reside on a third-party social media platform or housed within the organization. Even if a service provider stops providing their service or deletes information from an organization's account, or if the organization stops using a social media platform, the organization must fulfill its records management obligations.

f. Organizations will include a records management clause when negotiating a Terms of Service agreement or other contract vehicle with a service provider for social media services. NARA Bulletin 2014-02 (see <u>Bulletin 2014-02 | National Archives</u>) provides a general clause that can be modified to fit the social media platform and specific organization records management needs when using a service provider.

22. Judicial use of Electronic Records.

- a. Electronic records may be admitted in evidence to Federal courts for use in court proceedings (Federal Rules of Evidence 803 (8)) if trustworthiness is established by thoroughly documenting the recordkeeping system's operation and the controls imposed upon it.
- b. To enhance the legal admissibility of electronic records, USACE records officials will implement procedures that:
- (1) Document that similar kinds of records generated and stored electronically are created by the same processes each time and have a standardized retrieval approach.
- (2) Substantiate that security procedures prevent unauthorized access to and modification or deletion of a record as well as ensure system protection against such problems as power interruptions.
- (3) Identify the electronic media on which records are stored throughout their life cycle, the maximum time span that records remain on each storage medium, and the ARIMS disposition of the records.
- c. Coordinate all of the above with local legal staff and IT information and records management staff.
- d. All USACE records custodians will respond to and comply with legal holds as directed by the legal hold.
- e. All computers subject to a legal hold will be identified with ENG Form 6152 label affixed to the computer. The label will indicate that the computer contains records which are subject to a legal hold and warn that any repairs will be coordinated with the hold POC before any repairs are made. Personnel who are leaving their USACE position must identify these records to the local RIMS for long term preservation.
- 23. <u>Contractor records.</u> Records management oversight of contracts and contractor records is necessary to ensure that all long-term recordkeeping needs are met according to the instructions in ARIMS. Contractors will assign the appropriate record identification and disposition instructions to all records delivered to the Government. In addition, records and background electronic data specified for delivery to the contracting agency must be accompanied by sufficient technical documentation to permit use of the records and data.

- (a) Contractors performing congressionally mandated program functions must create and maintain records to document these programs. The contract must include requirements for the delivery of all pertinent documentation of contractor program execution.
- (b) Many other types of contracts involve the creation of background data that may have value to the Government. Whenever appropriate, agency officials will require the delivery of such background data in addition to the final product. For example:
- (1) Contracts to produce statistical analyses will specify the delivery of background data that may have value to the contracting agency or to other agencies.
- (2) Contracts to produce reports that represent Army policy will specify the delivery of background data needed to verify assertions or justify conclusions.
- (3) Research contracts will specify the delivery of background data that have value to the contracting agency.
- (4) A deferred ordering and delivery data clause should be included in the contract to acquire any data and records that may have value to the Government but were not identified in advance.

24. Filing Procedures.

- a. Maintaining information as records: Effective records maintenance and reference procedures are essential to document the Army's official business. This section contains procedures for maintaining Army information as records and applies to all media (including paper and electronic). Additional procedures are discussed in DA PAM 25-403, Ch 3.
- b. Arranging records. Unless specified by the prescribing directive, records should be arranged in a manner that best suits the business or reference needs of an office, except that records not covered by a Privacy Act (PA) System of Records Notice (SORN) will not be arranged by personal identifier (for example, name, or social security number). SORNs are listed on the Defense Privacy and Civil Liberties Office website at https://dpcld.defense.gov/Privacy/SORNs/
 - c. Maintaining classified documents both in paper and electronically.
 - (1) File classified and unclassified documents separately except when:
- (a) The volume of the classified material is small and it is more advantageous to use otherwise empty space for unclassified material. However, the classified material will be separated from the unclassified material by guide cards or by placement in separate drawers.
- (b) The record of an action consists of both classified and unclassified documents and reference needs require that both be filed together. Files, folders, and similar groups of documents containing classified and or sensitive information will be clearly marked as to the highest classification and or sensitivity of information contained therein. The classification and

or sensitivity marking will be on the outside, front and back, and top and bottom of the file or folder. Attaching a document cover sheet to the outside of the file or folder is acceptable in satisfying this requirement. When cover sheets are used, they will not be attached when the files are in a secure storage container. When cover sheets are removed and the items are in secure storage, the files or folders must be marked to indicate the highest level of classified and or sensitive information contained therein.

- (c) When classified and unclassified documents are filed together, the records or containers will be secured and access to the area or containers monitored as if all contents are classified to preclude the inadvertent disclosure of the classified materials.
- (2) All classified documents, both originally and derivatively classified (except those containing restricted data or formerly restricted data), will be marked on the face of the document with a "Declassify on" line, with instructions for the declassification of the information. Specific instructions for completing the "Declassify on" line are in AR 380-5.
- (3) Further guidance on the classification and marking of documents, files, and records can be found in AR 380-5.
- d. Maintaining records for multiple organizations. Officials performing duties for more than one organization will maintain the records created in each capacity separately. Examples of situations requiring separate recordkeeping are a division commander who is also an installation commander, a command safety officer who is also the installation safety officer, or the chief of a staff office who is also secretary of a committee.
- e. Maintaining records in libraries. Record copies of publications and other permanent documents as described in ARIMS will not be maintained as a part of library collections or manuscript collections in libraries or museums. When extra copies are maintained in these collections, they should be distinctly marked "LIBRARY COPY" or "MUSEUM COPY."

f. Record Titles and Labeling.

- (1) The term "labeling" includes all methods of identification and applies to all record material, regardless of media. All folders (paper and electronic) and containers used to store official records will be labeled. Using the ORL to create folders will ensure consistent naming conventions are used.
- (2) Offices with an ORL stored in ARIMS should use ARIMS to create and print labels for paper records. Labels may be created using the record subseries in ARIMS or with working titles that best fit the business and or reference use of the records in an office or both. Labels will include the record subseries number, a title, the year of file creation, "Yes" if a PA system notice number is applicable or "NA" if a PA system notice is not applicable and disposition instructions.
- (3) Labeling of electronic records may range from naming folders as those that are shared within the agency or separately managed at the office or individual level, to a detailed index of

single documents (for example, spreadsheets, database files, etc.) that reference or link to associated material to complete the record. See DA PAM 25-403 for detailed instructions.

25. Records Retirement and Transfer.

- a. Electronic long-term records should be submitted to the AEA as soon as action on them is complete. Action is considered to be complete when all issues/decisions have been made and no further action is required.
- b. Hardcopy records. Temporary long-term records with a retention period of 7 years or less will be retired to the Federal Records Center not later than 30 October 2022. Starting 1 January 2023 any hardcopy records still in USACE possession will be kept within a NARA approved commercial facility at USACE expense until final disposition. Permanent hardcopy records will be digitized, at USACE expense, prior to retirement to the AEA.
 - c. Sending records to the Army Electronic Archive.
- (1) The Bulk Archive Tool (BAT) feature in ARIMS will be used to retire current and prior year electronic long-term records to the AEA. The BAT may be executed directly from ARIMS to set up the electronic folders on a file system, for example an individual drive, shared drive or SharePoint site. Users uploading records to the AEA will receive on-line acknowledgement that such records were successfully submitted to the AEA. For additional information contact the USACE Records Administrator.
- (2) Electronic long-term records can be sent to ARIMS for storage in the AEA by originating offices or units as soon as they are complete (for example a newly signed ER, EM etc.). If the records must be kept on site longer than the completion date, a request for exception will be forwarded to USACE Records Officer, to include a point of contact (name, address, e-mail address, and telephone number) for coordinating and completing the information that will be entered to the master index of records in ARIMS.

d. Classified records.

- (1) Agency security managers must be consulted before retiring hardcopy classified records and actions initiated, as specified in AR 380-5, Para 6-27. FRC's will not accept classified records for storage that were not reviewed for declassification and marked with declassification dates. Classified information will not be disclosed on the SF 135 or equivalent; only unclassified titles may be used to identify the records. Agency security managers should be consulted for specific information. Electronic classified records will be retired using the classified ARIMS website (see above). All records will carry declassification instructions.
- (2) Instructions for listing, receipting and packing material with SECRET and CONFIDENTIAL classifications are the same as those for unclassified, except that unclassified titles will be used on the SF 135 or equivalent, to list the records. In addition, other receipts may be needed such as DA Form 3964 (Classified Document Accountability Record). Wrapping and shipping material with these classifications will be conducted as according to AR 380-5, chap 8.

- (3) Regardless of classification, restricted data and formerly restricted data will not be intermingled with other information when being retired to an FRC.
- g. CUI records. Records with the CUI protective marking will be packed as prescribed in this chapter for unclassified records.

26. Sub-Programs.

- a. Publication's record sets known as Prescribing directives (such as ER's, EM's etc.) will:
- (1) Ensure publications identify record information required to support their business processes and the records are created or received when carrying out the missions or functions of the programs prescribed therein. Proponents will review the recordkeeping requirements of a prescribing directive whenever making revisions to the directive.
- (2) Ensure requirements or established procedures governing the use and retention of the records are specified in USACE regulations, pamphlets etc. These requirements may pertain to the naming, arranging, and/or locating of files and established procedures (such as those governing data or input submitted for consolidated reports, summaries, or similar information).
- (3) Publications will ensure the following paragraph is a part of each publication, "Records management requirements for all record numbers, associated forms and reports requirement by [proponent's publication] are included in the Army Records Retention Schedule Army (RRS-A). Detailed information for all records numbers, forms and reports associated with [proponent's publication] are located in the RRS-A at https://www.arims.army.mil." Proponents should seek advice from the local RIMS to correctly identify all records in the publication.
- b. Official Mail will be overseen by the local RIMS as the OMM. RIMS are responsible for postage management, inspection of the mailroom, providing local guidance as per AR 25-51, DA PAM 25-53, DOD 4525.8, and DOD 4525.9. Must take yearly OMM training and ensure Mail Clerk takes official training for that position as well.
- c. Office symbols are overseen by the RIMS and will be modified/updated when a Permanent Order has been published. Office symbols will conform to the guidance of AR 25-59.

Note. USACE is authorized the use of one additional alpha character within the Divisions.

- d. Correspondence Management is prescribed by AR 25-50; all end users should be familiar with this guidance. The RIMS will provide guidance on the placement and use of the records number and correct templates for each piece of correspondence.
- e. Information Management Collections are divided into two separate workstreams; those that will be conducted with the general public and those conducted internally to USACE. The

USACE RO and Privacy Act officer oversee the process for both these types of collections. Public collections will follow all guidance per AR 25-98; internal collections will be worked by the RIMS, USACE RO and the Privacy Act Officer. All public collections which use non-DoD software will be approved by the USACE Cyber team.

f. Privacy Act compliance is overseen by the USACE Privacy Act officer. RIMS enforce the program per guidance published by the Privacy Act officer. RIMS should report any suspected issues (release of PII, loss of phone/computer, inadvertent deletion of PII) to the Enterprise Service Desk via phone.

Appendix A References

Federal Records Act of 1950, as amended, Title 44 U.S.C Chapters 21, 25, 29, 31 and 33.

Title 36, Code of Federal Regulations, Chapter XII, "National Archives, and Records Administration," Subchapter B, "Records Management."; www.archives.gov

DoD Instruction 5015.2, Department of Defense Records Management Program, <u>DoDI 5015.02</u>, February 24, 2015, Incorporating Change 1 on August 17, 2017 (whs.mil)

DoD 5015.2-STD, Electronic Records Management Software Applications Design Criteria Standard, http://www.dtic.mil/whs/directives/corres/pdf/501502std.pdf.

Army Regulation (AR) 25-1, Army Information Technology, <u>ARN18191_R25_1_FINAL.pdf</u> (<u>army.mil</u>)

AR 25-2, Information Assurance, ARN17503 AR25 2 Admin FINAL.pdf (army.mil).

AR 25-22, The Army Privacy Program, ARN13587 R25 22 FINAL.pdf (army.mil).

AR 25-30, The Army Publishing Program, ARN30485-AR 25-30-000-WEB-1.pdf (army.mil).

AR 25-400-2, The Army Records Information Management System (ARIMS), <u>untitled</u> (army.mil).

AR 25-50, Preparing and Managing Correspondence, <u>ARN32225-AR_25-50-003-WEB-6.pdf</u> (army.mil).

AR 25-55, The Department of Army Freedom of Information Act Program, <u>ARN30378-AR_25-55-000-WEB-1.pdf</u> (army.mil)

AR 25-98, Information Management Collection Program, ARN20910 R25 98 ADMIN FINAL.pdf (army.mil).

AR 380-5, Department of the Army Information Security Program, ARN4438 AR380 5 FINAL.pdf (army.mil)

Department of the Army (DA) Pamphlet 25-1-2, Information Technology Contingency Planning, <u>ARN30196-PAM_25-1-2-000-WEB-1.pdf (army.mil)</u>

DA Pamphlet 25-403, Guide to Recordkeeping in the Army, untitled (army.mil)

Engineering Regulation (ER) Emergency Employment of Army and Other Resources, National Response Planning Guide 500-1-28

Office of Management and Budget (OMB) Circular A-130, Management of Federal Information Management Resources, <u>Review-Doc-2016--466-1.docx (whitehouse.gov)</u>

OMB Directive M-19-21, Managing Government Records Directive, <u>Memorandum for Heads of Executive Departments and Agencies Number M-19-21 (archives.gov)</u>

Glossary

Army Consolidated Records Schedule (ACRS)

A large aggregation schedule crosswalk, or in other words, a framework which organizes the RRS-A record numbers (RNs) according to functionally related records series and subseries.

Army Records Information Management System (ARIMS)

The IT system for identifying, arranging, managing, storing (electronic records), retrieving and applying dispositions to Army record material. The system is accessed via the ARIMS Web site (https://www.arims.army.mil). The Web site contains the RRS-A, the ACRS framework, the AEA and a software suite of tools to manage Army record information.

Capstone

An approach developed by NARA so that agencies can automatically capture and preserve as permanent the e-mail of Senior Officials. Capstone supports the Presidential Memorandum on Managing Government Records and aids agencies in complying with OMB/NARA M-12-18 Managing Government Records Directive

Copy

A reproduction or duplication of an original record. Copies are often identified by their functions, such as action copy, file or record copy, information or reference copy, and official copy.

Crosswalk

The table or chart listing RRS-A record series numbers within the ACRS framework.

Disposition

The actions taken with noncurrent records. These include transfer to the AEA, a records holding area, retirement to an FRC, authorized donations, destruction, and accessioning into the National Archives.

Disposition instructions

Precise instructions specifying the time and/or event for transfer, retirement, or destruction of record information.

Donation

The transfer of Army records (which are unclassified, non-sensitive and eligible for destruction) to a qualified agency, organization, institution, or person. USARMDA approval is required for donations.

Electronic mail (e-mail)

A document created or received on an electronic mail system including brief notes, more formal or substantive narrative documents, and any attachments, such as word-processing and other electronic documents, which may be transmitted with the message.

Electronic messages

Electronic mail and other electronic messaging systems that are used for purposes of communicating between individuals.

File

An accumulation of records maintained in a predetermined physical or electronic arrangement or to place documents in a predetermined location according to an overall plan of classification.

Housekeeping files

Records accumulated or generated in an office that document the internal administrative functions of the office as opposed to those that document the primary missions of the office.

Information Management

Activities required to coordinate, plan, organize, analyze, integrate, evaluate, and control information resources effectively throughout their life-cycle.

Information System

A set of information resources organized for the collection, processing, use, sharing, storage, maintenance, transmission, dissemination and disposition of information as identified by defined procedures, whether automated or manual.

Metadata

Information describing the characteristics of data; data or information about stored data; descriptive information about an organization's data, data activities, systems, and holdings.

Office

Any place where record information is created, maintained, or used.

Office Records List

A list of the specific RRS-A record titles and numbers describing record information accumulated or generated in an office. The list includes the ACRS, SORN, disposition code and prescribing directive information for each record title and RN entry. It is prepared within each element where records are accumulated or generated by using the ARIMS ORLs & Folders module (tab). ORLs are coordinated with the organization or installation records management official.

Permanent Records

The designation applied to records worthy of permanent retention by the United States, and accessioned into the National Archives.

Record Copy

That copy of a record kept by the agency, office, or element directly responsible for the function to which the record relates. It does not include reading file copies or copies held for convenience or reference.

Record Number

The number assigned to an RRS-A record title describing a unique category of record information.

Record series

A group of records that are generally used and filed as a unit because they relate to a particular subject or function, result from the same activity, document a specific type of transaction or relate in some other fashion.

Records

As defined in the Federal Records Act of 1950, as amended, the term "records" includes all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of 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 United States Government or because of the informational value of data in them.

The term "records" does not include library and museum material made or acquired and preserved solely for reference or exhibition purposes or duplicate copies of records preserved only for convenience.

The term "recorded information" includes all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form.

Records Center

A secure facility that is designed and constructed for low-cost and efficient storage of records, and for reference service on semi-current records, pending their ultimate disposition.

Records Holding Area

A secure facility established to collect and maintain cutoff records until they are either eligible for destruction or retirement to an FRC or other records depository. When located outside of the continental U.S., these facilities are referred to as Overseas Command Records Holding Areas (OCRHAs). See also chapter 9.

Records Management

The planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to record information creation, maintenance (use, storage, retrieval) and disposition in order to achieve adequate and proper documentation of Federal policies and transactions and effective and economical management of DA operations.

Retention Period

The length of time that a record must be kept before it is destroyed. Records not authorized for destruction have a retention period of permanent.

Records Retention System-Army

The system governing the identification, retention and disposition of recurring series or types of Army record information. An Army directive, usually an AR or DA Pamphlet, prescribes the creation, maintenance, and use of the record information. The purpose of the RRS-A is to provide continuing authority to dispose of, transfer, or archive record information.

Retire

The movement of records from an office, unit, or RHA into an FRC.

Security Classified Information

Official records or information requiring protection against unauthorized disclosure. The degree of protection is specified by one of the following: TOP SECRET, SECRET, CONFIDENTIAL.

Social Media

As defined by NARA, Social media tools use Internet and web-based technologies (often called Web 2.0 technologies) to integrate technology, social interaction, and content creation. Social media use the "wisdom of crowds" to connect information in a collaborative manner online. Through social media, individuals or collaborations of individuals create web content, organize content, edit or comment on content, combine content, and share content.

Transfer

The movement of records from an office or unit into an RHA or the AEA.

Unidentified Files

Records that are not currently described under RRS-A record titles or numbers. When such records are determined to exist, specific records management actions prescribed in this regulation will be taken.

Unscheduled Records

Records which have not been approved by NARA for disposition. They may not be destroyed or deleted.

Vital (Essential) Records

The essential records needed to meet operational responsibilities under national security emergencies or other emergency or disaster conditions (emergency operating records) or to protect the legal and financial rights of the Government and those affected by Government activities (legal and financial rights records).

Web Site

A location on the Internet; specifically, it refers to the point of presence location in which it resides. All Web sites are referenced using a special addressing scheme called a URL. A Web site can mean a single HTML file or hundreds of files placed on the Internet by an enterprise. (AR 25-1 25, Jun2013, Web site) A collection of hypertext markup language pages, graphics, images, video, audio, databases, or other media assets at a URL, which is made available for distribution or is distributed or transmitted (with or without limitation) via the World Wide Web for reception and display on a computer or other devices including but not limited to

mobile phones, PDA's or interactive television; and whose content is controlled, authorized, or sponsored by an Army organization or representative. A computer on the Internet or an Intranet running a Web server that responds to HTTP and HTTPS requests from Web browsers.

Working Papers

Documents such as rough notes, calculations, or drafts that are assembled or created and used in the preparation or analysis of other documents. These documents are also considered records and are filed under the appropriate RRS-A titles.