



Centers for Disease Control
and Prevention (CDC)
Atlanta GA 30333

May 8, 2018

Aaron Siri
Siri and Glimstad, LLP
200 Park Avenue
Seventeenth Floor
New York, New York 10166
Via email: aaron@sirillp.com

Dear Mr. Siri:

This letter is our final response to your Centers for Disease Control and Prevention and Agency for Toxic Substances and Disease Registry (CDC/ATSDR) Freedom of Information Act (FOIA) request of April 27, 2018, assigned #18-00661-FOIA, for records retention policies for the years 2007, 2008, 2009 and 2010.

We located 29 pages of responsive records. After a careful review of these pages, no information was withheld from release.

No fees are assessed for this request as the fee amount fell below our billing threshold.

If you need any further assistance or would like to discuss any aspect of the records provided please contact either our FOIA Requester Service Center at 770-488-6399 or our FOIA Public Liaison at 770-488-6277.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Andoh", is positioned below the word "Sincerely,".

Roger Andoh
CDC/ATSDR FOIA Officer
Office of the Chief Operating Officer
(770) 488-6399
Fax: (404) 235-1852

18-00661-FOIA

RECORDS MANAGEMENT

Sections:

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I. PURPOSE

This issuance provides general information, guidance, and policy regarding the records management program at the Centers for Disease Control and Prevention (CDC)^[1]. The major purpose of this policy and the CDC records management program is to ensure ready access to records and data which will help improve and promote the health of the American public while complying with the Federal Records Act and the need to document the official activities of CDC.

II. ABBREVIATIONS, ACRONYMS AND DEFINITIONS

A. For the purpose of this policy, the following abbreviations and acronyms apply.

- 1. **CC/CO** – coordinating centers/coordinating offices
- 2. **CFR** – Code of Federal Regulations
- 3. **FOIA** – Freedom of Information Act
- 4. **FRC** – Federal Records Center
- 5. **GAO** – General Accounting Office
- 6. **GRS** – General Records Control Schedules
- 7. **GSA** – General Services Administration
- 8. **HHS** – Department of Health and Human Services
- 9. **ICE** – integrated contracts expert
- 10. **MASO** – Management Analysis and Services Office
- 11. **NARA** – National Archives and Records Administration

- 12. **OMB** – Office of Management and Budget
- 13. **OSEP** – Office of Security and Emergency Preparedness
- 14. **PD** – position description
- 15. **RO** – records officer
- 16. **USC** – United States Code

B. For the purpose of this policy, the following definitions apply.

1. Records – defined in [44 U.S.C. 3301](#) as “... 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 United States 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. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and of processed documents are not included.”

As defined in the law, documentary materials are federal records when they are made or received by a federal agency in connection with the transaction of government business, regardless of media, and they are maintained or should be maintained by the agency to document how it was organized, what functions it performed, how it carried out those functions, how it related to other agencies and to the public, or because the materials contain information of value to the agency. Records may include such material as printed material, posters, video tapes, DVDs, e-mails, web sites, faxes, etc.

2. Documentary materials – a collective term for federal records, non-record materials, and personal papers that refers to all media containing recorded information, whatever the method(s) or circumstance(s) of recording. Federal records may be created on any physical media including, paper, film (microfilm, photographic film, x-ray), disk (optical, magnetic, video, audio), and tape (magnetic, video, audio). The method of recording information may be manual, mechanical, photographic, electronic, or any combination of these or other technologies.

3. Working files – documents such as rough notes, calculations, or drafts assembled or created and used to prepare or analyze other documents. These are often kept in individuals' office space during the course of work on a project. However, after completion of the project these documents should be retained with other substantive project records if they meet the definition of a “federal record” – sometimes called working papers.

4. Official project files – case or project files that represent official records documenting a specific action, event, person, place, project, or other matter, and that are placed in the possession of the office in which they were created.

5. Federal Records Center – a series of regional storage facilities operated by NARA for the purpose of efficiently maintaining and disposing of inactive federal records. (CDC stores thousands of cubic feet of inactive records in these facilities.)

6. National Archives – the repository of records that have been identified as historic and as [essential evidence](#) to document the workings of the federal government.

7. Administrative records – records relating to budget, personnel, supply, and similar housekeeping, or facilitative functions common to most agencies.

8. Program records – records documenting the unique, substantive functions for which an agency is responsible.

9. Records disposition – entails those actions taken on records once their legal retention periods have ended. These activities include: records retirement, donation, transfer to NARA as a permanent record and records destruction.

10. Records control schedules – schedules for the retention of federal records approved by the archivist of the United States. The legally required retention period for CDC programmatic records can be found in the [CDC Records Control Schedule B-321](#), the [ATSDR Schedule B-371](#) and the [NARA-produced General Records Control Schedules](#).

A [list of additional terms and definitions](#) is available on the MASO Records Management website.

III. BACKGROUND

Having ready access to records aids federal agencies in operating efficiently and economically, with information upon which knowledgeable and effective decisions can be based. Effective intra-agency communications and agency interactions with the public, Congress, and the President often depend on ready access to the data contained in federal records.

In addition, in litigious situations, agencies depend on records to protect their legal rights and interests and those of the public that agencies are charged to serve. Complicating recordkeeping in the United States government is the profusion of e-mail and intranet systems used by federal agencies. The creation, maintenance, storage, and access to these countless electronic documents created and received in the course of federal business has greatly complicated recordkeeping. The federal government strongly encourages the creation of adequate and proper documentation of federal records, as described in [36 C.F.R. 1220](#).

IV. POLICY

CDC will maintain a comprehensive records management program that will ensure the creation and maintenance of complete and accurate records of its programs and activities and ensure the efficient and economical management of all records in compliance with [44 U.S.C. 2901](#).

Based in statute, the practice of ensuring "adequate and proper documentation" contributes to efficient and economical agency operations by guaranteeing that information is documented in official files, including electronic recordkeeping systems, where it will be accessible to all authorized staff who may need it.

In addition to paper (textual) files and electronic recordkeeping systems, official files may comprise or contain audiovisual, cartographic, or architectural materials. The availability of complete and accurate documentation allows federal agencies to protect the legal and financial rights of the government and of individuals directly affected by government activities; preserve institutional memory so that informed decisions are possible and thus facilitate action by agency officials and their successors in office; and be held accountable through the proper scrutiny by the Congress and oversight agencies such as GAO, OMB, NARA, and GSA, as well as agency auditors and inspectors general.

V. RESPONSIBILITIES

This section defines the roles and responsibilities of designated officials within CDC required to enact the records management policy.

A. Director, MASO, is responsible for the following activities related to CDC records management:

The Director of MASO is responsible for

- Overall management and direction of records management at CDC.
- Basic records support services for the agency.
- Oversight of records management training for various CDC employees.
- Continued operation of the CDC records retirement program (described below).
- Overall guidance and support provided for such activities as files creation, maintenance and disposition.

B. CDC records officer is responsible for the following activities related to CDC records management:

The CDC RO, located in MASO, has the delegated authority to ensure that CDC follows established federal recordkeeping laws, regulations and common best practices. The RO

- Performs oversight responsibilities regarding records status, compliance with laws and regulations.
- Recommends to the Director of MASO the establishment of records management policy and training activities for the agency.

- Provides advice and consultation on records management acquisitions, as required.
- Approves purchases of filing systems, etc., through ICE.
- Serves as the liaison between NARA, other federal agencies and CDC on activities such as the development of records control schedule(s), records retirement, and the transfer of permanent CDC records to NARA.
- Processes approvals for destruction of records, records request accessioning, and manages the [CDC Records Database](#).

C. Supervisors and managers are responsible for the following activities related to CDC records management, ensuring that:

- Adequate and proper documentation of the organization's activities are kept through the creation and preservation of federal records.
- Official files (records that facilitate such activities as scientific inquiries, audits, and possible discovery actions) are properly maintained.
- Official files contain full and accurate documentation of the substantive operation(s) of the program, including valuable information which may be collected.
- Non-standard filing equipment and supplies are ordered when standard filing supplies will not meet storage requirements or that savings in manpower, space or work production will accrue.

D. CC/CO and centers^[2] are responsible for the following activities related to CDC records management:

- Appointing records liaisons to manage records and informing the CDC RO of selections or changes.
- Ensuring that records are being managed efficiently and economically.
- Ensuring that records liaisons are trained to properly manage the organization's records.
- Fully utilizing existing filing space by
 - Retiring inactive records to the FRC or NARA.
 - Destroying records as authorized by the appropriate disposal schedule (see below).
 - Fully utilizing all file containers and drawers.
 - Removing all extraneous items and personal property where records are being maintained (example: purses, lunch bags, briefcases, etc.)
 - Surveying existing filing equipment to determine if it can be redistributed.
- Authorizing funds (if needed) for records transportation.

E. Records liaisons are responsible for the following activities related to CDC records management:^[3]

- Day-to-day operation of the organization's records management operations.

- Assisting the CDC RO in such activities as:
 - Records inventories.
 - Records schedule development.
 - Files setup.
 - Records classification.
 - Records retirement.
 - Records retrieval from FRCs.
 - Records disposition (including signing off on the destruction of the organization's records at FRCs).

F. File technicians are responsible for the following activities related to CDC records management:^[4]

- Maintenance of a specific organization's official file stations.
- Knowledge of records classification systems.
- Knowledge of records retirement to a FRC.
- Knowledge of the use of the CDC RCS and GRS.
- Assistance to records liaisons to set up filing systems, retire records to a FRC, and other specific records management duties.

G. All employees are responsible for the following activities related to CDC records management:

- Ensure federal records are maintained in official files, not stored in personal files.
- Ensure federal records are not removed from the possession of the government.
- Remember that federal records belong to the government, not individuals.
- Know that working files are preliminary federal records and should be treated as such.
- Ensure that records leaving a federal facility for purposes of telecommuting must be maintained in the same manner as if they had remained in a federal facility.
- Exercise basic caution and discretion when handling federal records.
- Obtain permission from their supervisor to remove federal records from a federal facility.
- Secure federal records while traveling, e.g., storing them in a car trunk instead of a backseat, for example.
- Document federal records created by electronic mail as delineated by [CDC Information Resources Policy CDC-09, Record Keeping Procedures for Managing E-mails and Attachments that Qualify as Federal Records.](#)

VI. PROCEDURES

The following procedures ensure the correct implementation of this policy.

A. Records Creation and Classification

When creating any records management format, planning should always precede the creation of any system. Oversight and consultation of these activities is provided by the CDC RO.

Additional information is available from the [MASO records management website](#), and from the center [designated file technicians](#).

In addition, CDC staff may use the services of the CDC records management task order contract to conduct records inventories, and to obtain assistance in the development of records control schedules, files cleanup and maintenance procedures, and files setup, classification, and disposition. For more information, contact the CDC RO and see the [Records Management Task Order Contract website](#).

B. File Maintenance (Filing Practices)

These activities are performed on active records and records systems, sometimes called official file stations, and related filing equipment to ensure efficient and effective management of federal records; provide adequate and proper documentation of CDC activities; and, ensure quick and easy access to essential information.

These activities usually consist of “files cut off,” conducting and tracking reference (use of charge out and charge in documentation), daily filing, version control, amending filing systems by expanding or revising, coding of individual records to ensure proper placement and retrieval. These activities are usually performed by a files technician or records liaison. Files, filing systems and practices should be reviewed regularly to verify their usefulness for the informational and decision making needs of office staff.

If required, the CDC RO should be consulted for determination of what services would be best for the records management needs of the organization.

For more information on suggested files maintenance guidelines, see the CDC’s guidelines for [Retirement and Disposal of Records](#) and guidelines on [Suggested CDC Subject Outline for Classification of Current Administrative Records](#), and the [Relative Index to CDC Subject Outline for Classification of Current Administrative Records](#), as posted on the records management website.

C. Securing Federal Records

Classified files should be kept in a safe or other GSA-approved security container. Classified files should not leave a federal facility. Special regulations for handling classified files can be found via the [CDC OSEP](#) and by following instructions in [Information Resources Policy CDC-05 Classified Materials](#).

Sensitive but unclassified files may be located in securely locking files or cabinets, and should not be left in public view. Regulations for handling sensitive but unclassified files, as well as for handling classified files, can be found via the [HHS Office of Security and Drug Testing National Safety Information Manual](#), Section 7-00.

D. Records Disposition

Records disposition oversight activities are managed by the CDC RO and center/office records liaisons. This includes ensuring that CDC records are maintained in accordance with approved records control schedules (see CDC and ATSDR [approved schedules](#)) and managing the CDC retirement and disposition program (including the review and approval of the destruction of records stored in FRCs). In addition, many records disposition activities can be performed using the CDC records management task order contract.

Records liaisons should contact the CDC RO regarding training on CDC records retirement procedures.

The CDC encourages records to be retired to the FRC or to NARA as specified in the records disposition schedule. This allows for accurate tracking and managing of older data. The process:

- Reduces the volume of active records that need to be searched for required records and information;
- Using automation, identifies records that cannot be destroyed because of litigation activity;
- Results in the creation of tracking data (metadata) that improves the control and management of older records;
- Reduces the destruction burden on organizations (the FRCs destroy federal records in accordance with all federal requirements);
- Allows for regular review of the records to be destroyed for possible retention;
- Reduces storage costs for CDC (it is much less expensive to store records in FRC facilities than in CDC office space); and
- Ensures that records are disposed of in accordance with an approved record control schedule, reducing possible liabilities, possible unauthorized destructions of federal records, and enhances response to continual FOIA requests.

E. Record Destruction

Only records approved for destruction in an approved records control schedule may be destroyed. Records that are unscheduled may not be destroyed until an applicable approved records control schedule is found or approved. Of course, records designated for permanent retention by NARA may **not** be destroyed under **any** circumstances.

All records involved in litigation, including discovery actions, may **not** be destroyed. Examples of records that **must not** be destroyed and should be **permanently maintained** include: documents involved in tobacco litigation, ATSDR records of toxic waste sites, and others. For a list of current records that are involved in legal actions and whose dispositions are frozen, please contact the CDC RO. Additionally, records that are involved in authorized audits and investigations and FOIA and Privacy Act request appeals may **not** be destroyed.

The unauthorized destruction of federal records is illegal and may lead to fines of up to \$3,000 and imprisonment of up to three years in jail ([18 U.S.C. 2071](#)). For more information, contact the CDC RO. Further guidelines can be found in CDC's guidelines on [Retirement and Disposal of Records](#).

F. Electronic Records Management

As more of the government's records are created electronically, and agencies face the huge task of managing millions of e-mails created weekly, the necessity for an electronic record-keeping system has become imperative. The printing and storage of these documents is no longer a viable option. CDC is currently testing an electronic records management system at the Office of Health and Safety. This policy will be updated when information is available regarding the new system requirements and procedures. Use of an electronic records management system must be approved by the CDC RO, MASO. Until a permanent e-records management system has been selected and implemented, all CDC electronic records (e-mails, Word documents, Excel spreadsheets, etc.) must be retained in their present electronic format.

G. Training and Assignment of Records Management Duties

To be a resource in records management for CDC organizations, the records liaison should be trained in federal records management through NARA and other organizations, and, at a minimum, must take NARA's Introduction to Records Management course, and have training by the MASO staff on the basic operation of the CDC records management database. This training will provide organizations with access to metadata on retired CDC records located at seven FRCs across the country dating from circa 1946 to the present. Training should be taken prior to the beginning of duties as a records liaison. The liaison should serve as a resource for federal records management within their organization. Therefore, they should be knowledgeable of federal records management laws and regulations, and understand files technology and records classification. Further information and guidelines on records classification and indexing are available from the [Suggested CDC Subject Outline for Classification of Current Administrative Records](#), and the [Relative Index to CDC Subject Outline for Classification of Current Administrative Records](#), posted on the MASO records management page.

These duties are recommended as part of the records liaison's position description and work plan.

VII. REFERENCES

- A. [Agency Records Management Programs](#), 36 C.F.R. Sect. 1220.30, 34, 36 (2004).
- B. [Definition of Records](#), 44 U.S.C. Chapter 3301 (2003).
- C. [CDC Records Management Homepage](#), April 2005.
- D. [National Archives and Records Administration \(NARA\) Homepage](#), May 2005.
- E. [Objectives of Records Management](#), 44 U.S.C. Chapter 2902 (2003).

- F. [Disposition of Federal Records, A Records Management Handbook](#). NARA, Washington, D.C., 1997 edition.
- G. [CDC Office of Security and Emergency Preparedness \(OSEP\) Homepage](#), December 2003.
- H. [Manual Guide, Information Resources CDC-09](#), Record Keeping Procedures for Managing E-Mails and Attachments that Qualify as Federal Records. CDC, June 2000.
- I. [Manual Guide, Information Resources CDC-05](#), Classified Material. CDC, April 2002.
- J. [National Security Information Manual](#). HHS, Office of Security and Drug Testing, February 2005.
- K. Electronic Recordkeeping IRM Handbook, U.S. General Services Administration, U.S. GPO, July 1989.
- L. [Concealment, Removal, or Mutilation Generally](#), 18 U.S.C. Chapter 101 (2004).

^[1] References to CDC also apply to the Agency for Toxic Substances and Disease Registry (ATSDR).

^[2] References to centers also apply to the National Institute for Occupational Safety and Health and the Office of the Director.

^[3] Federal agencies are required to operate a records management program as specified in [36 C.F.R. 1220](#).

⁴ Federal agencies are required to operate a records management program as specified in [36 C.F.R. 1220](#).

General Administration CDC-112

Date of Issue: 7/27/2005 Updated: 10/17/2005^[1]

Proponent: Management Analysis and Services Office

RECORDS MANAGEMENT

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V. RESPONSIBILITIES

This section defines the roles and responsibilities of designated officials within CDC required to enact the records management policy.

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The Director of MASO is responsible for

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D. CC/CO and centers ^[3] are responsible for the following activities related to CDC records management:

- Appointing records liaisons to manage records and informing the CDC RO of selections or changes.
- Ensuring that records are being managed efficiently and economically.
- Ensuring that records liaisons are trained to properly manage the organization's records.
- Fully utilizing existing filing space by
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below).

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- Surveying existing filing equipment to determine if it can be redistributed.
- Authorizing funds (if needed) for records transportation.

E. Records liaisons are responsible for the following activities related to CDC records management: [\[4\]](#)

- Day-to-day operation of the organization's records management operations.
- Assisting the CDC RO in such activities as:
 - Records inventories.
 - Records schedule development.
 - Files setup.
 - Records classification.
 - Records retirement.
 - Records retrieval from FRCs.
 - Records disposition (including signing off on the destruction of the organization's records at FRCs).

F. File technicians are responsible for the following activities related to CDC records management: [\[5\]](#)

- Maintenance of a specific organization's official file stations.
- Knowledge of records classification systems.
- Knowledge of records retirement to a FRC.
- Knowledge of the use of the CDC RCS and GRS.
- Assistance to records liaisons to set up filing systems, retire records to a FRC, and other specific records management duties.

G. All employees are responsible for the following activities related to CDC records management:

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VI. PROCEDURES

The following procedures ensure the correct implementation of this policy.

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In addition, CDC staff may use the services of the CDC records management task order contract to conduct records inventories, and to obtain assistance in the development of records control schedules, files cleanup and maintenance procedures, and files setup, classification, and disposition. For more information, contact the CDC RO and see the [Records Management Task Order Contract website](#).

B. File Maintenance (Filing Practices)

These activities are performed on active records and records systems, sometimes called official file stations, and related filing equipment to ensure efficient and effective management of federal records; provide adequate and proper documentation of CDC activities; and, ensure quick and easy access to essential information.

These activities usually consist of “files cut off,” conducting and tracking reference (use of charge out and charge in documentation), daily filing, version control, amending filing systems by expanding or revising, coding of individual records to ensure proper placement and retrieval. These activities are usually performed by a files technician or records liaison. Files, filing systems and practices should be reviewed regularly to verify their usefulness for the informational and decision making needs of office staff.

If required, the CDC RO should be consulted for determination of what services would be best for the records management needs of the organization.

For more information on suggested files maintenance guidelines, see the CDC’s guidelines for [Retirement and Disposal of Records](#) and guidelines on [Suggested CDC Subject Outline for Classification of Current Administrative Records](#), and the [Relative Index to CDC Subject Outline for Classification of Current Administrative Records](#), as posted on the records management website.

C. Securing Federal Records

Classified files should be kept in a safe or other GSA-approved security container. Classified files should not leave a federal facility. Special regulations for handling classified files can be found via the [CDC OSEP](#) and by following instructions in [Information Resources Policy CDC-05 Classified Materials](#).

Sensitive but unclassified files may be located in securely locking files or cabinets, and should not be left in public view. Regulations for handling sensitive but unclassified files, as well as for handling classified files, can be found via the [HHS Office of Security and Drug Testing National Safety Information Manual](#), Section 7-00.

D. Records Disposition

Records disposition oversight activities are managed by the CDC RO and center/office records liaisons. This includes ensuring that CDC records are maintained in accordance with approved records control schedules (see CDC and ATSDR [approved schedules](#)) and managing the CDC

retirement and disposition program (including the review and approval of the destruction of records stored in FRCs). In addition, many records disposition activities can be performed using the CDC records management task order contract.

Records liaisons should contact the CDC RO regarding training on CDC records retirement procedures.

The CDC encourages records to be retired to the FRC or to NARA as specified in the records disposition schedule. This allows for accurate tracking and managing of older data. The process:

- Reduces the volume of active records that need to be searched for required records and information;
- Using automation, identifies records that cannot be destroyed because of litigation activity;
- Results in the creation of tracking data (metadata) that improves the control and management of older records;
- Reduces the destruction burden on organizations (the FRCs destroy federal records in accordance with all federal requirements);
- Allows for regular review of the records to be destroyed for possible retention;
- Reduces storage costs for CDC (it is much less expensive to store records in FRC facilities than in CDC office space); and
- Ensures that records are disposed of in accordance with an approved record control schedule, reducing possible liabilities, possible unauthorized destructions of federal records, and enhances response to continual FOIA requests.

E. Record Destruction

Only records approved for destruction in an approved records control schedule may be destroyed. Records that are unscheduled may not be destroyed until an applicable approved records control schedule is found or approved. Of course, records designated for permanent retention by NARA may **not** be destroyed under **any** circumstances.

All records involved in litigation, including discovery actions, may **not** be destroyed. Examples of records that **must not** be destroyed and should be **permanently maintained** include: documents involved in tobacco litigation, ATSDR records of toxic waste sites, and others. For a list of current records that are involved in legal actions and whose dispositions are frozen, please contact the CDC RO. Additionally, records that are involved in authorized audits and investigations and FOIA and Privacy Act request appeals may **not** be destroyed.

The unauthorized destruction of federal records is illegal and may lead to fines of up to \$3,000 and imprisonment of up to three years in jail ([18 U.S.C. 2071](#)). For more information, contact the CDC RO. Further guidelines can be found in CDC's guidelines on [Retirement and Disposal of Records](#).

F. Electronic Records Management

As more of the government's records are created electronically, and agencies face the huge task of managing millions of e-mails created weekly, the necessity for an electronic record-keeping system has become imperative. The printing and storage of these documents is no longer a viable option. CDC is currently testing an electronic records management system at the Office of Health and Safety. This policy will be updated when information is available regarding the new system requirements and procedures. Use of an electronic records management system must be approved by the CDC RO, MASO. Until a permanent e-records management

system has been selected and implemented, all CDC electronic records (e-mails, Word documents, Excel spreadsheets, etc.) must be retained in their present electronic format.

G. Training and Assignment of Records Management Duties

To be a resource in records management for CDC organizations, the records liaison should be trained in federal records management through NARA and other organizations, and, at a minimum, must take NARA's Introduction to Records Management course, and have training by the MASO staff on the basic operation of the CDC records management database. This training will provide organizations with access to metadata on retired CDC records located at seven FRCs across the country dating from circa 1946 to the present. Training should be taken prior to the beginning of duties as a records liaison. The liaison should serve as a resource for federal records management within their organization. Therefore, they should be knowledgeable of federal records management laws and regulations, and understand files technology and records classification. Further information and guidelines on records classification and indexing are available from the [Suggested CDC Subject Outline for Classification of Current Administrative Records](#), and the [Relative Index to CDC Subject Outline for Classification of Current Administrative Records](#), posted on the MASO records management page.

These duties are recommended as part of the records liaison's position description and work plan.

VII. REFERENCES

- A. [Agency Records Management Programs](#), 36 C.F.R. Sect. 1220.30, 34, 36 (2004).
- B. [Definition of Records](#), 44 U.S.C. Chapter 3301 (2003).
- C. [CDC Records Management Homepage](#), April 2005.
- D. [National Archives and Records Administration \(NARA\) Homepage](#), May 2005.
- E. [Objectives of Records Management](#), 44 U.S.C. Chapter 2902 (2003).
- F. [Disposition of Federal Records, A Records Management Handbook](#). NARA, Washington, D.C., 1997 edition.
- G. [CDC Office of Security and Emergency Preparedness \(OSEP\) Homepage](#), December 2003.
- H. [Manual Guide, Information Resources CDC-09](#), Record Keeping Procedures for Managing E-Mails and Attachments that Qualify as Federal Records. CDC, June 2000.
- I. [Manual Guide, Information Resources CDC-05](#), Classified Material. CDC, April 2002.
- J. [National Security Information Manual](#). HHS, Office of Security and Drug Testing, February 2005.
- K. [Electronic Recordkeeping IRM Handbook](#), U.S. General Services Administration, U.S. GPO, July 1989.
- L. [Concealment, Removal, or Mutilation Generally](#), 18 U.S.C. Chapter 101 (2004).
- M. [HHS OCIO Policy for Electronic Records Management](#). HHS, Office of the Assistant Secretary for Budget, Technology and Finance, September 2005.

[1] Updated to add HHS OCIO Policy on Electronic Records Management.

[2] References to CDC also apply to the Agency for Toxic Substances and Disease Registry (ATSDR).

[3] References to centers also apply to the National Institute for Occupational Safety and Health and the Office of the Director.

[4] Federal agencies are required to operate a records management program as specified in [36 C.F.R. 1220](#).

[5] Federal agencies are required to operate a records management program as specified in [36 C.F.R. 1220](#).

RECORDS MANAGEMENT

Sections:

- I. [PURPOSE](#)
- II. [ABBREVIATIONS, ACRONYMS AND DEFINITIONS](#)
- III. [BACKGROUND](#)
- IV. [POLICY](#)
- V. [RESPONSIBILITIES](#)
- VI. [PROCEDURES](#)
- VII. [REFERENCES](#)

I. PURPOSE

This issuance provides general information, guidance, and policy regarding the records management program at the Centers for Disease Control and Prevention (CDC)^[2]. The major purpose of this policy and the CDC records management program is to ensure ready access to records and data which will help improve and promote the health of the American public while complying with the Federal Records Act and the need to document the official activities of CDC.

II. ABBREVIATIONS, ACRONYMS AND DEFINITIONS

- A. For the purpose of this policy, the following abbreviations and acronyms apply.
 - 1. **CC/CO** – coordinating centers/coordinating offices
 - 2. **CFR** – Code of Federal Regulations
 - 3. **FOIA** – Freedom of Information Act
 - 4. **FRC** – Federal Records Center
 - 5. **GAO** – General Accounting Office
 - 6. **GRS** – General Records Control Schedules
 - 7. **GSA** – General Services Administration
 - 8. **HHS** – Department of Health and Human Services
 - 9. **ICE** – integrated contracts expert

¹ Updated to add HHS OCIO Policy for Records Management.

- 10. **MASO** – Management Analysis and Services Office
- 11. **NARA** – National Archives and Records Administration
- 12. **OMB** – Office of Management and Budget
- 13. **OSEP** – Office of Security and Emergency Preparedness
- 14. **PD** – position description
- 15. **RO** – records officer
- 16. **USC** – United States Code

B. For the purpose of this policy, the following definitions apply.

1. Records – defined in [44 U.S.C. 3301](#) as “... 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 United States 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. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and of processed documents are not included.”

As defined in the law, documentary materials are federal records when they are made or received by a federal agency in connection with the transaction of government business, regardless of media, and they are maintained or should be maintained by the agency to document how it was organized, what functions it performed, how it carried out those functions, how it related to other agencies and to the public, or because the materials contain information of value to the agency. Records may include such material as printed material, posters, video tapes, DVDs, e-mails, web sites, faxes, etc.

2. Documentary materials – a collective term for federal records, non-record materials, and personal papers that refers to all media containing recorded information, whatever the method(s) or circumstance(s) of recording. Federal records may be created on any physical media including, paper, film (microfilm, photographic film, x-ray), disk (optical, magnetic, video, audio), and tape (magnetic, video, audio). The method of recording information may be manual, mechanical, photographic, electronic, or any combination of these or other technologies.

3. Working files – documents such as rough notes, calculations, or drafts assembled or created and used to prepare or analyze other documents. These are often kept in individuals' office space during the course of work on

a project. However, after completion of the project these documents should be retained with other substantive project records if they meet the definition of a “federal record” – sometimes called working papers.

4. Official project files – case or project files that represent official records documenting a specific action, event, person, place, project, or other matter, and that are placed in the possession of the office in which they were created.

5. Federal Records Center – a series of regional storage facilities operated by NARA for the purpose of efficiently maintaining and disposing of inactive federal records. (CDC stores thousands of cubic feet of inactive records in these facilities.)

6. National Archives – the repository of records that have been identified as historic and as [essential evidence](#) to document the workings of the federal government.

7. Administrative records – records relating to budget, personnel, supply, and similar housekeeping, or facilitative functions common to most agencies.

8. Program records – records documenting the unique, substantive functions for which an agency is responsible.

9. Records disposition – entails those actions taken on records once their legal retention periods have ended. These activities include: records retirement, donation, transfer to NARA as a permanent record and records destruction.

10. Records control schedules – schedules for the retention of federal records approved by the archivist of the United States. The legally required retention period for CDC programmatic records can be found in the [CDC Records Control Schedule B-321](#), the [ATSDR Schedule B-371](#) and the [NARA-produced General Records Control Schedules](#).

A [list of additional terms and definitions](#) is available on the MASO Records Management website.

III. BACKGROUND

Having ready access to records aids federal agencies in operating efficiently and economically, with information upon which knowledgeable and effective decisions can be based. Effective intra-agency communications and agency interactions with the public, Congress, and the President often depend on ready access to the data contained in federal records.

In addition, in litigious situations, agencies depend on records to protect their legal rights and interests and those of the public that agencies are charged to serve. Complicating recordkeeping in the United States government is the profusion of e-mail and intranet systems used by federal agencies. The creation, maintenance, storage, and access to

these countless electronic documents created and received in the course of federal business has greatly complicated recordkeeping. The federal government strongly encourages the creation of adequate and proper documentation of federal records, as described in [36 C.F.R. 1220](#).

IV. POLICY

CDC will maintain a comprehensive records management program that will ensure the creation and maintenance of complete and accurate records of its programs and activities and ensure the efficient and economical management of all records in compliance with [44 U.S.C. 2901](#).

Based in statute, the practice of ensuring "adequate and proper documentation" contributes to efficient and economical agency operations by guaranteeing that information is documented in official files, including electronic recordkeeping systems, where it will be accessible to all authorized staff who may need it.

In addition to paper (textual) files and electronic recordkeeping systems, official files may comprise or contain audiovisual, cartographic, or architectural materials. The availability of complete and accurate documentation allows federal agencies to protect the legal and financial rights of the government and of individuals directly affected by government activities; preserve institutional memory so that informed decisions are possible and thus facilitate action by agency officials and their successors in office; and be held accountable through the proper scrutiny by the Congress and oversight agencies such as GAO, OMB, NARA, and GSA, as well as agency auditors and inspectors general.

V. RESPONSIBILITIES

This section defines the roles and responsibilities of designated officials within CDC required to enact the records management policy.

A. Director, MASO, is responsible for the following activities related to CDC records management:

The Director of MASO is responsible for

- Overall management and direction of records management at CDC.
- Basic records support services for the agency.
- Oversight of records management training for various CDC employees.
- Continued operation of the CDC records retirement program (described below).
- Overall guidance and support provided for such activities as files creation, maintenance and disposition.

B. CDC records officer is responsible for the following activities related to CDC records management:

The CDC RO, located in MASO, has the delegated authority to ensure that CDC follows established federal recordkeeping laws, regulations and common best practices. The RO

- Performs oversight responsibilities regarding records status, compliance with laws and regulations.
- Recommends to the Director of MASO the establishment of records management policy and training activities for the agency.
- Provides advice and consultation on records management acquisitions, as required.
- Approves purchases of filing systems, etc., through ICE.
- Serves as the liaison between NARA, other federal agencies and CDC on activities such as the development of records control schedule(s), records retirement, and the transfer of permanent CDC records to NARA.
- Processes approvals for destruction of records, records request accessioning, and manages the [CDC Records Database](#).

C. Supervisors and managers are responsible for the following activities related to CDC records management, ensuring that:

- Adequate and proper documentation of the organization's activities are kept through the creation and preservation of federal records.
- Official files (records that facilitate such activities as scientific inquiries, audits, and possible discovery actions) are properly maintained.
- Official files contain full and accurate documentation of the substantive operation(s) of the program, including valuable information which may be collected.
- Non-standard filing equipment and supplies are ordered when standard filing supplies will not meet storage requirements or that savings in manpower, space or work production will accrue.

D. CC/CO and centers^[3] are responsible for the following activities related to CDC records management:

- Appointing records liaisons to manage records and informing the CDC RO of selections or changes.
- Ensuring that records are being managed efficiently and economically.
- Ensuring that records liaisons are trained to properly manage the organization's records.
- Fully utilizing existing filing space by
 - Retiring inactive records to the FRC or NARA.
 - Destroying records as authorized by the appropriate disposal schedule (see below).
 - Fully utilizing all file containers and drawers.
 - Removing all extraneous items and personal property where records are being maintained (example: purses, lunch bags, briefcases, etc.)
 - Surveying existing filing equipment to determine if it can be redistributed.
- Authorizing funds (if needed) for records transportation.

E. Records liaisons are responsible for the following activities related to CDC records management:^[4]

- Day-to-day operation of the organization's records management operations.
- Assisting the CDC RO in such activities as:
 - Records inventories.
 - Records schedule development.
 - Files setup.
 - Records classification.
 - Records retirement.
 - Records retrieval from FRCs.
 - Records disposition (including signing off on the destruction of the organization's records at FRCs).

F. File technicians are responsible for the following activities related to CDC records management:^[5]

- Maintenance of a specific organization's official file stations.
- Knowledge of records classification systems.
- Knowledge of records retirement to a FRC.
- Knowledge of the use of the CDC RCS and GRS.
- Assistance to records liaisons to set up filing systems, retire records to a FRC, and other specific records management duties.

G. All employees are responsible for the following activities related to CDC records management:

- Ensure federal records are maintained in official files, not stored in personal files.
- Ensure federal records are not removed from the possession of the government.
- Remember that federal records belong to the government, not individuals.
- Know that working files are preliminary federal records and should be treated as such.
- Ensure that records leaving a federal facility for purposes of telecommuting must be maintained in the same manner as if they had remained in a federal facility.
- Exercise basic caution and discretion when handling federal records.
- Obtain permission from their supervisor to remove federal records from a federal facility.
- Secure federal records while traveling, e.g., storing them in a car trunk instead of a backseat, for example.
- Document federal records created by electronic mail as delineated by [Information Resources Policy CDC-IR-2000-01, Record Keeping Procedures for Managing E-mails and Attachments that Qualify as Federal Records.](#)

VI. PROCEDURES

The following procedures ensure the correct implementation of this policy.

A. Records Creation and Classification

When creating any records management format, planning should always precede the creation of any system. Oversight and consultation of these activities is provided by the CDC RO.

Additional information is available from the [MASO records management website](#), and from the center [designated file technicians](#).

In addition, CDC staff may use the services of the CDC records management task order contract to conduct records inventories, and to obtain assistance in the development of records control schedules, files cleanup and maintenance procedures, and files setup, classification, and disposition. For more information, contact the CDC RO and see the [Records Management Task Order Contract website](#).

B. File Maintenance (Filing Practices)

These activities are performed on active records and records systems, sometimes called official file stations, and related filing equipment to ensure efficient and effective management of federal records; provide adequate and proper documentation of CDC activities; and, ensure quick and easy access to essential information.

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If required, the CDC RO should be consulted for determination of what services would be best for the records management needs of the organization.

For more information on suggested files maintenance guidelines, see the CDC’s guidelines for [Retirement and Disposal of Records](#) and guidelines on [Suggested CDC Subject Outline for Classification of Current Administrative Records](#), and the [Relative Index to CDC Subject Outline for Classification of Current Administrative Records](#), as posted on the records management website.

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Classified files should be kept in a safe or other GSA-approved security container. Classified files should not leave a federal facility. Special regulations

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Records disposition oversight activities are managed by the CDC RO and center/office records liaisons. This includes ensuring that CDC records are maintained in accordance with approved records control schedules (see CDC and ATSDR [approved schedules](#)) and managing the CDC retirement and disposition program (including the review and approval of the destruction of records stored in FRCs). In addition, many records disposition activities can be performed using the CDC records management task order contract.

Records liaisons should contact the CDC RO regarding training on CDC records retirement procedures.

The CDC encourages records to be retired to the FRC or to NARA as specified in the records disposition schedule. This allows for accurate tracking and managing of older data. The process:

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These duties are recommended as part of the records liaison's position description and work plan.

VII. REFERENCES

- A. [Agency Records Management Programs](#), 36 C.F.R. Sect. 1220.30, 34, 36 (2004).
- B. [Definition of Records](#), 44 U.S.C. Chapter 3301 (2003).
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- F. [Disposition of Federal Records, A Records Management Handbook](#). NARA, Washington, D.C., 1997 edition.
- G. CDC Office of Security and Emergency Preparedness (OSEP) Homepage, December 2003.
- H. [Information Resources CDC-IR-2000-01](#), Record Keeping Procedures for Managing E-Mails and Attachments that Qualify as Federal Records. CDC, June 2000.
- I. [Information Resources CDC-IR-2002-03](#), Classified Material. CDC, April 2002.
- J. [National Security Information Manual](#). HHS, Office of Security and Drug Testing, February 2005.
- K. Electronic Recordkeeping IRM Handbook, U.S. General Services Administration, U.S. GPO, July 1989.
- L. [Concealment, Removal, or Mutilation Generally](#), 18 U.S.C. Chapter 101 (2004)
- M. [HHS OCIO Policy for Electronic Records Management](#). HHS, Office of the Assistant Secretary for Budget, Technology and Finance, September 2005.
- N. [HHS OCIO Policy for Records Management](#). HHS, Office of the Chief Information Officer, January 2008.

^[1] Updated to add HHS OCIO Policy on Electronic Records Management

^[2] References to CDC also apply to the Agency for Toxic Substances and Disease Registry (ATSDR).

^[3] References to centers also apply to the National Institute for Occupational Safety and Health and the Office of the Director.

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