NARA Bulletin 2016-XX

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TO: Heads of Federal Agencies

SUBJECT: Agency Records Management Training Requirements

EXPIRATION DATE: Expires when revoked or superseded

1. Background

In September 2014, OMB and NARA issued a joint memorandum, Guidance on Managing Email (M-14-16). In addition to providing guidance on the management of email, the memorandum reasserted Goal 2.4 of the Managing Government Records Directive (M-12-18) requiring agencies to establish and develop suitable records management training.

2. What is the purpose of this bulletin?

This Bulletin provides the minimum requirements for agency records management training programs. The Bulletin identifies who must take records management training and how often this training must be provided. It also describes best practices for inclusion in training. This Bulletin supplements the general training requirements outlined in 36 CFR 1220.34.

3. Agency Records Management Training Requirements

A. Agencies *must* provide records management training to all agency employees, contractors, and volunteers with official government email accounts who create, receive, or use Federal records.

B. Agencies *must* administer training annually. New employees must complete records management training within 30 calendar days of employment at the agency.

C. Agencies *must* incorporate the following minimum required content areas into records management training:

1. Define Federal records.

2. Describe how records management supports the agency's mission and business processes, and public access to government information.

3. Provide an overview of government-wide and agency-specific records management policies and recordkeeping requirements.

4. Explain employees' and contractors' legal responsibilities for creation, maintenance, and disposition of Federal records.

5. Describe the stages of the records management lifecycle, to include the creation, maintenance and use, disposition, and the difference between temporary and permanent records, all of which are addressed in the agency's disposition schedule.

6. Describe how to distinguish records from nonrecord materials and personal materials.

7. Describe how records are maintained and filed in the agency, including:

    a. What is a records schedule, its legal authority, and where to find their agency's schedules;

    b. Why it is important to follow records schedules and file plans; and

    c. How records schedules and files plans are implemented and updated.

8. Explain how legal holds (sometimes called records freezes) and the discovery phase of litigation affect records handling, retention, and disposition.

9. Describe how and where to store Federal records.

10. Describe how agency information technology (IT) systems are used for records management (if applicable, how to use agency records management technologies).

11. Describe how to manage record and nonrecord materials in email, social media, and other electronic messages, including the statutory requirement to capture in agency recordkeeping systems all email or messages sent or received using a personal or non-official account within 20 days of creation or receipt.

12. Describe what to do with record and nonrecord materials when an employee leaves the agency.

13. Advise senior agency officials, senior executives, and political appointees about their Federal records management obligations.

14. Describe what to do when records are removed, lost, or destroyed without proper authorization.

15. Describe where to get more information about records management (e.g., websites, manuals, where to find the agency's records schedule, file plans, and agency Records Officer contact information).

16. Provide agency contacts for records management questions. Include information for the field and/or headquarters points of contact for retiring records to storage, transferring permanent records, destruction of records, and answering records management questions.

4. Agency Records Management Training Best Practices

The following are recommended best practices. Agencies *should*:

A. Provide targeted training for political appointees, senior agency officials, and senior executives.

Agencies *should* provide targeted records management training upon their arrival and departure, and within three to six months prior to a presidential administration change. This may include conducting entry and exit interviews with your agency's records management staff, IT liaisons, and general counsel to ensure that records are preserved and protected.

B. Develop and Administer Mandatory Training Together

Agency records officers and other staff *should* consider developing and administering RM training with other mandatory training programs, such as information security awareness or cyber-security training. This will create cost efficiencies, consolidate mandatory training cycles, and minimize training fatigue from the annual mandatory training requirements separately administered throughout the year.

C. Training Design

Agency records management staff *should* coordinate with learning and development professionals to assist with the design, development, and tracking of training. Agencies *should* design training so that individuals apply what they are learning during training. Agencies are also encouraged to develop assessments to verify that trainees have learned the content.

D. Role-Based Training

Agencies *should* offer records management training specific to the needs of the following groups:

1. Senior level agency officials and political appointees;
2. Records professionals at all levels within the organization;
3. Managers and supervisors;
4. Acquisition, contracting, and procurement personnel;
5. Legal and general counsel;
6. Personnel developing and managing IT systems and applications; and
7. Continuity of Operations and Disaster Preparedness personnel that manage mission essential/vital records.

5. Whom should I contact for more information?

If additional information is needed, or if you have questions about any part of this Bulletin, please contact nara.recordsmgttraining@nara.gov.