

NCA RECORDS AND INFORMATION MANAGEMENT PROCEDURES

- 1. REASON FOR ISSUE:** To update National Cemetery Administration (NCA) procedures for the creation, maintenance, and disposition of Federal records.
- 2. SUMMARY OF CHANGES:** Changes in this handbook include updating the background information and the definitions section to be consistent with changes made to 44 U.S.C. 3301 by Public Law 113-187.
- 3. RESPONSIBLE OFFICE:** National Cemetery Administration, Office of Information Management and Business Support Service (43D), 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the content in this Handbook. Questions may be directed to the NCA Records Officer, within the Information Management and Business Support Service.
- 4. RELATED PUBLICATIONS:**
 - a. VA Handbook 6300.1, Records and Information Management Procedures.
 - b. NCA Directive 6300, NCA Records and Information Management.
 - c. NCA Records Control Schedule.
- 5. RESCISSION:** NCA Handbook 6300, NCA Records and Information Management Procedures (May 8, 2012)
- 6. RECERTIFICATION:** This publication is scheduled for recertification on or before the last day of March 2023.

/s/
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Principal Deputy Under Secretary
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TABLE OF CONTENTS

SECTION I – INTRODUCTION 1

 1. PURPOSE/AUTHORITY 1

 2. BACKGROUND 1

 3. DEFINITIONS 2

 4. SCOPE 3

 5. REFERENCES 3

SECTION II – RECORDS CREATION 4

 1. PLANNING 4

 2. CREATION 4

 3. DOCUMENTATION OF OFFICIAL ACTIONS AND ACTIVITIES 4

SECTION III – RECORDS MAINTENANCE AND USE 5

 1. MAINTENANCE 5

 2. USE 6

 3. FILES MANAGEMENT 6

SECTION IV – RECORDS DISPOSITION 8

 1. POLICY 8

 2. SCHEDULING 8

 3. RETENTION 9

 4. DISPOSITION 10

 5. STORAGE 11

SECTION I – INTRODUCTION

1. PURPOSE/AUTHORITY: This Handbook establishes procedures and guidelines to ensure that all NCA records are managed as an asset throughout the three basic stages of their life cycle: creation, active maintenance and use, and disposition. The statutory authority for NCA's Records and Information Management Program derives from the Federal Records Act of 1950, as amended, see title 44 of the United States Code (U.S.C.), chapters 21, 29, 31, and 33.

2. BACKGROUND:

a. Section 2901(2) of title 44 U.S.C. defines "records management" as the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, maintenance, use, and disposition in order to achieve adequate and proper documentation of the policies and transactions of the Federal Government and effective and economical management of agency operations.

b. Section 3301 of title 44 U.S.C. defines "records" as 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.

c. Not all documentary materials used by the NCA and its agents are records. Consistent with 36 CFR 1222.14, the term "records" does not include 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. Although these materials may not be "records," some may still belong to NCA and must be maintained and destroyed in accordance with the NCA Records Control Schedule.

d. When planning for the creation or collection of records, whether automated or manual, it is necessary to consider the entire life cycle of the information contained in the records. The records life cycle is initiated by the creation, collection, or receipt of records in the form of data or documents in the course of carrying out NCA's administrative and programmatic responsibilities. The life cycle continues through the processing and active use of the information in the record until the record is determined to be inactive. The final step in the life cycle is disposition. Disposition can be through storage of inactive records, destruction of records that have met retention requirements, transfer of historic superseded records to the NCA History Collection for use, or transfer of records to the National Archives and Records Administration (NARA).

e. Essential elements of a records management program include issuing up-to-date program directives, properly training those responsible for implementation, and carefully

evaluating the results to ensure adequacy, effectiveness, and efficiency. Office of Management and Budget (OMB) Circular A-130, Managing of Information as a Strategic Resource, require that agencies integrate records management into the overall information resources management program.

3. DEFINITIONS: This is a partial listing of records and information management terminology. Additional terms and definitions may be found in NCA Directive 6300, as well as the publications cited in the references section of this Handbook.

a. **Disposition**. An interim or final placement of records and recorded information; the actions taken with regard to records and recorded information to maintain them in a proper place following their appraisal, including the actions of (1) retaining; (2) transferring to a records center for temporary storage; (3) transferring to an archival agency; (4) donation to an eligible repository; and (5) image reproduction or destruction.

b. **File plan**. Document listing records filed in an office and their disposition authority.

c. **Life cycle**. The records management concept covering creation, maintenance and use, and disposition of records and recorded information.

d. **Records**. 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 U.S. Government or because of the informational value of data in them.

e. **Records management**. The planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, maintenance, use, and disposition, in order to achieve adequate and proper documentation of the policies and transactions of the Federal Government and effective and economical management of agency operations.

f. **Records Officer (NCA)**. The individual in NCA Central Office that has been designated as responsible for working with the VA Records Officer in managing and coordinating a records management program for NCA.

g. **Records Liaison**. Individuals in NCA offices, services, organizations and field locations responsible for implementation of records management procedures.

h. **Record series**. File units or documents kept together because they relate to a particular subject or function, result from the same activity, document a specific kind of transaction, take a particular physical form, or have some other relationship arising out of the creation, collection, receipt, or use (such as restrictions on access and use).

4. SCOPE: The procedures and guidelines published in this handbook apply to all NCA records in any format and/or location. Because all NCA employees are involved in creating, maintaining, and using records, all NCA employees must understand their records management responsibilities as specified in NCA Directive 6300, Records and Information Management.

5. REFERENCES:

- a. Federal Records Act of 1950, as amended, see 44 U.S.C. chapters 21, 29, 31, and 33.
- b. 18 U.S.C. 2071.
- c. 36 CFR parts 1220 through 1239.
- d. 41 CFR parts 102-192 through 102-193.
- e. National Archives and Records Administration, Disposition of Federal Records, (2000 web edition based on the 1997 edition) available electronically at <https://www.archives.gov/records-mgmt/publications/disposition-of-federal-records>.
- f. VA Directive 6300, Records and Information Management (February 26, 2009).*
- g. VA Handbook 6300.7, Procedures for Computer Matching Programs (January 5, 2015).
- h. VA Handbook 6300.1, Records Management Procedures (March 24, 2010).*
- m. VA Directive 6301, Electronic Mail Records (April 24, 1997).*
- n. VA Handbook 6301, Procedures for Handling Electronic Mail Records (April 24, 1997).*
- o. NCA Handbook 6300, NCA Records and Information Management Procedures (publication date).**
- p. NCA Records Control Schedules for VA Central Office, Memorial Service Network Offices, and National Cemeteries (available from NCA Records Officer).
- q. NCA Acting Principal Deputy Under Secretary for Memorial Affairs memorandum "Records Management - Records Control Liaison" (March 9, 2012) (available from NCA Records Officer).

* Available electronically at <http://www1.va.gov/vapubs/>

** Available electronically (internal to VA only) at <http://vawww.nca.va.gov/>

SECTION II – RECORDS CREATION

1. PLANNING:

a. When planning for the creation or collection of records, it is necessary to consider the entire life cycle of the information contained in the records. The records life cycle is initiated by the creation, collection, or receipt of records in the form of data or documents in the course of carrying out NCA's administrative and programmatic responsibilities.

b. The NCA program official responsible for authorizing the establishment of a new or revised information system or records collection will ensure that the life cycle of the information in the system/collection has been analyzed and documented prior to its implementation. That documentation should be provided to the Records Liaison designated for that particular area of responsibility, and the NCA Records Officer, who should be involved in the planning and decision making processes for both manual and automated (electronic) information systems. The documentation will also be the basis for appraisal and scheduling of the records, and their inclusion in the NCA Records Control Schedule (RCS). (See VA Handbook 6300, chapter 8, for procedures related to records appraisal.)

c. VA has issued guidance that should be followed for the creation or collection of records or information pertaining to individuals, involving a computer matching program, or received from or provided to other agencies or contractors (see the references paragraph of section I of this Handbook).

2. CREATION:

a. Records are generally produced in whatever medium and format meet the creating program's needs. However, because records have varying life spans depending upon their legal, fiscal, historical, or administrative value, it may be necessary to convert or migrate records to new systems or formats to ensure accessibility over their entire lifespan.

b. Federal records may be subject to release under the provisions of legal discovery and the Freedom of Information Act (FOIA). Certain records about individuals may have protections under the Privacy Act. Questions about the content, use and disclosure of records should be directed to the Chief, Information Technology Business Requirements and Administrative Service.

3. DOCUMENTATION OF OFFICIAL ACTIONS AND ACTIVITIES:

a. NCA staff is responsible for incorporating into the official record all essential information on their major actions or activities. For example, significant decisions and commitments should be formalized in writing and included in the official record. Minutes

should be taken at important meetings and made part of the record (together with a copy of meeting agenda and documents considered or resulting from such meetings).

b. The programs, policies, and procedures of NCA should be adequately documented in appropriate directives, handbooks, or other publications. A record copy of each such publication and supporting documentation (including any superseded publications) should be maintained as part of the official NCA files.

c. Certain records are considered vital to NCA and VA:

(1) Emergency Operating Records are vital to the essential functions of NCA for the duration of an emergency. They must be immediately available to key program officials as needed, at or in the vicinity of emergency operating centers, to ensure continuity of daily business operations. Examples for NCA include current operating budget plan, an inventory of available gravesites by cemetery, and list of key employees who could potentially be called to active duty.

(2) Rights and Interests Records are essential to the preservation of the legal and financial rights and interests of individuals and the U.S. Government. They are not needed immediately following an emergency, but have enduring value and should be maintained in accordance with vital records policy outlined in VA Handbook 6300.2, Management of the Vital Records Program. Examples for NCA include records of interment.

d. Any personal files maintained by NCA staff in office space should be clearly labeled and filed separately so there is no confusion about their creation or use. If a record combines personal and official information (e.g., an email with information about establishing official functions and a question about personal health) the portion pertaining to official business should be separated, printed, and made part of the official agency files.

e. Non-record, informational materials should be clearly marked as such when they are created, distributed or received. Generally, non-record materials may be removed or disposed of when superseded, obsolete, or no longer needed for reference, if their removal will not change or diminish the official record, incur any extra costs, or violate confidentiality required by national security, privacy, or other legal interests.

SECTION III – RECORDS MAINTENANCE AND USE

1. MAINTENANCE: The records life cycle continues through the processing and active use of the information in the record until the record is determined to be inactive. The records and information created and collected by NCA must be maintained in a manner allowing ready retrieval whenever necessary throughout the approved life cycle of the information.

2. USE:

a. Federal statutes and regulations require that employees must follow established procedures for ensuring the security and integrity of official records, and maintaining personal files or non-record materials in an appropriate fashion. The records and information of NCA must be protected and used, disseminated, or released only in accordance with applicable Federal laws and regulations (see the references paragraph in section I of this Handbook).

b. All printing services (including requests for letterhead, CD-ROM production, printing, binding, and blank-book work) must be procured by or through the Government Publishing Office in accordance with Government Printing and Binding Regulations published by the Joint Committee on Printing, Federal Acquisition Regulation, and 44 U.S.C. 501. All NCA Central Office and field staff members must submit requests for printing service procurements to VA Publications Service, through the NCA Publications Control Officer, on VA Form 7700, Request for Reproduction Services.

c. All plain copy paper should be purchased locally using a Government Purchase Card in accordance with established procedures.

3. FILES MANAGEMENT:

a. Good filing practices include filing only what is necessary, filing in a way that facilitates records access and disposition, and filing consistently. Files should be maintained in accordance with the retention and disposition instructions approved for NCA records under NARA's General Records Schedules (GRS) and the records schedules specifically approved by NARA for NCA unique records.

b. Standardized filing equipment and systems will be used to facilitate ease of records use, access, and disposition. Files must be maintained and secured using standardized filing equipment to safeguard Personal Identifying Information (PII). This is personal information that can be retrieved by the name of an individual, date of birth, social security number, or any other personal identifier. Official records should be maintained only in designated official file stations. These can be centrally located, or in areas that facilitate optimum daily access and convenience. File locations and plans will be documented to maximize the usefulness of the records and allow retrieval throughout their life cycle. Management of the files should include standardized procedures for retrieval, charge-out, and refiling of records and information.

c. File folders should be established only when file material exists under that subject. Folder labels should contain descriptive titles, record dates, and appropriate destruction information (e.g., reference copy – destroy when no longer needed, superseded, or obsolete; record copy – destroy when 'x' years old) or indicate appropriate NARA GRS or NCA Records Control Schedule (RCS) item number where retention information can be found. Folders for subdivisions of a primary subject will be prepared only when records volume or the need for more detail dictates. The retention

and disposition instructions of the primary subject folder should be followed for all subfolders.

d. Permanent and temporary records should be filed in separate folders since each type of record has a different retention period. An NCA RCS will be used in the development of an office's file plan; the current schedules are available from the NCA Records Officer.

e. In general, administrative files should be closed at the end of each fiscal or calendar year, as appropriate, and the contents disposed of in accordance with the NCA RCS. Depending on the volume of records collected and their retention, it may be appropriate to dispose of some records during the year, while other folders can remain open from year to year. The NCA Records Officer can work with program staff to develop and implement appropriate scheduling for routine records management procedures. Disposition guidelines and procedures are covered in Section IV of this Handbook.

f. Standard equipment and supplies stocked by the General Services Administration, Office of Federal Supply Service, should be used to the maximum extent possible. New folders should be created when the contents reach over one inch in thickness. Folders should be labeled "1 of 2," "2 of 2," etc. to clearly note what folders belong together.

g. Official file stations should contain only official records. Personal files and non-record materials (copies of materials, stocks of publications, etc.) should be maintained separately from official files. Official files should be reviewed periodically to ensure that records are being retained and disposed of appropriately.

h. Each Records Liaison is responsible for applying NCA-approved record management principles and techniques to office filing practices to organize and maintain records properly, retrieve them rapidly, ensure their completeness, and make their disposition easier.

i. Each Records Liaison will use a file plan (the NCA Records Officer can assist in development, if necessary) to identify the specific records to be maintained, the location(s), the NCA RCS number(s), title or description, and disposition. The office file plan should be used as a reference/guide, with one copy kept by the Records Liaison and one copy be kept with the filed records. Each file plan should be reviewed and verified or updated every three years.

SECTION IV – RECORDS DISPOSITION

1. POLICY:

a. NCA has established and maintained a records disposition program to ensure efficient, prompt, and orderly reduction in the quantity of records and to provide for the proper maintenance of records designated as permanent by the National Archives and Records Administration (NARA). The systematic removal of inactive records from NCA offices is needed to ensure that records are disposed of efficiently and economically.

b. Disposition of Federal records common to Federal agencies (payroll, budget, travel, etc.) is covered in the General Records Schedules (GRS) published by NARA. The retention and disposition instructions of the GRS must be followed. Records unique to NCA are covered under a Records Control Schedule (RCS) approved by the Archivist of the United States.

c. All official record copies of NCA records must be maintained and disposed of in accordance with the retention and disposition instructions specified in the NCA RCS, with entries that cite to the appropriate GRS or NCA RCS authority. Before records can be disposed of, they must be inventoried and matched to an appropriate item in the NCA RCS.

d. Generally, non-record materials may be removed or disposed of when superseded, obsolete, or no longer needed for reference, if their removal will not change or diminish the official record, incur any extra costs, or violate confidentiality required by national security, privacy, or other legal interests. At NCA, informative non-record materials may be transferred to the History Program.

e. It is important to remember that the records NCA staff create and receive as Federal employees in connection with the mission and functions of their office or the Department belong to the United States and not to the individual employee. Willful and unlawful destruction, removal, or damage of Federal records can result in a fine, or imprisonment, or both, under the provisions of title 18 U.S.C. 2071. Any unlawful or accidental destruction or removal of NCA records must be reported to the NCA Records Officer within one day after initial discovery.

2. SCHEDULING:

a. Records scheduling is the process of appraising records and developing instructions for what to do with record and non-record materials when they are no longer actively needed for Federal business.

b. In addition to the schedules for records held in common by most Federal agencies and published by NARA in the GRS, NCA has four specific schedules approved for NCA-unique records (three approved in 1985, and one in 2000). If there are NCA records in programs or offices that do not match the descriptions given in the

existing RCS, or new records have been or will be created that need new entries, contact the NCA Records Officer.

c. When necessary to delete or revise an existing NCA-specific records schedule, or create a new schedule to cover new records, the NCA Records Officer will work with the Records Liaison to develop an appropriate schedule for NARA approval.

3. RETENTION

a. All records and recorded information will be classified as record or non-record through the appraisal process (see VA Handbook 6300, chapter 8, for procedures related to records appraisal). Retention of records varies based upon their ongoing legal, fiscal, historical, or administrative value. Official records can be either temporary or permanent, based upon their content and circumstances of creation and use. NCA records that are more than 30 years old that have not been appraised since 1990 should be brought to the attention of the NCA Records Officer.

(1) A record has legal value if it contains evidence of legally enforceable rights or obligations of the Federal Government. This includes records showing legal decisions and opinions; documents representing legal agreements such as leases, titles and contracts; and records of action in specific legal cases (such as claims papers).

(2) A record has fiscal value if it pertains to NCA financial transactions, such as budgets, ledgers, allotments, payroll, and vouchers created as tools to administer NCA financial obligations. These records must be retained for specific periods of time in case they are needed to protect NCA against legal action or to account for expenditure of funds.

(3) A record has administrative value if it helps NCA perform its current work, or if it will help to perform future work. In most cases, the administrative value of the record ends when the action or function to which it relates has been completed.

(4) A record has historical value if it helps NCA chronicle its past, identify the evolution of policies and practices, or provides answers that may impact future decisions. In most cases, the historical value of the record is permanent and perpetual. Records with historical value may include records with legal, fiscal and administrative value.

b. Temporary records are scheduled for destruction after a specified time period (a few months to 75 years). Destruction can take place either at NCA or at the Federal Records Center (FRC) where the records are stored once they become inactive. The majority of all Federal records are Temporary.

c. Permanent records have been determined to have enduring value. They are held under NCA control for a specified time period, and then transferred to the custody of the National Archives for permanent retention. NCA 'permanent' records include records of interment, burial registers, headstone/marker applications, directives and handbooks,

speeches and news releases, and other records that document the history of NCA, its organization and functions, policies, and legal status.

4. DISPOSITION

a. Disposition of records occurs in several ways:

(1) In some cases temporary records may be destroyed, after the specified retention period is over, by the office that has custody of the files. This can be done on an annual basis, or for some records, when a triggering action occurs, such as receipt of a new publication that supersedes a publication already on file. Bulk destruction of records in NCA Central Office can be arranged through the NCA Records Officer. Records containing personal, classified, sensitive, or potentially proprietary information should be destroyed by shredding, reformatting of hard drives or disks, or other appropriate actions. The Records Officer or Information Security Officer can provide advice for specific records or files.

(2) Temporary records that are inactive, but not yet eligible for destruction can be shipped to an FRC to free up space and lower storage costs.

(3) Permanent records are those determined to be sufficiently valuable for historical or other purposes and warrant continued preservation by the Federal Government. Some are shipped to an FRC for a period of storage before transfer to NARA, others are transferred directly to the legal and physical custody of NARA.

b. The correct standard records center box for shipment of records to an FRC or NARA measures 14 $\frac{3}{4}$ x 12 x 9 $\frac{1}{2}$; the stock number is NSN 8115-00-117-8249. The NCA Records Officer can advise on packing of records and preparation of box content listings. Records should be screened to remove all non-record materials such as drafts that do not contain substantive information or are identical to the final product, worksheets, notes, etc. Records kept in three-ring binders must be transferred to folders before they are put into the boxes, as binders take up too much space.

c. VA Form 7468 (Request for Disposition of Records) is used to request destruction, storage, or transfer of NCA records. A separate form is required for each series of records, and temporary and permanent records must be handled on separate forms. Each form must be accompanied by a listing of the contents of the boxes. The more detailed the box listing, the better the chance of retrieving material from the stored boxes in the future. The completed box listing should be submitted to the NCA Records Officer or Records Liaison, who will work with the NCA Records Officer.

d. Requirements for the management of electronic records are the same as for paper or other hard copy records; however, the records schedules must specifically address the electronic version of record series, and there are other considerations that are unique to electronic records. See guidance in VA Directives and Handbooks 6300, 6300.1, and 6301.

5. STORAGE

a. NCA records stored at an FRC belong to NCA and can be retrieved for use or withdrawn if a change in retention/disposition is necessary. Shipments of records to an FRC should be accompanied by a detailed listing of boxed records to simplify the future retrieval of specific files or folders. Once records with a Permanent designation are transferred to the custody of the National Archives, they are available for public access at the NARA facility in College Park, Maryland.

b. If records transferred to an FRC or NARA are subject to restrictions on release, NCA must provide a justification and cite the statute or Freedom of Information Act exemption that authorizes restriction(s) on the use or examination of records. If the records are subject to the Privacy Act, NCA must provide a copy of the most recent Privacy Act Notice published for that System of Records.

c. Special non-paper based media records, including microfilm, video and audio tapes, photographs, magnetic tapes, blueprints, etc., can be easily damaged if they are not stored in areas with proper environmental controls to maintain the integrity of the media. NCA offices with such records should work with the Records Officer to ensure that such records are adequately protected during periods of use and storage.