



NASA Procedural Requirements

COMPLIANCE IS MANDATORY

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Chapter 3. Records Life-Cycle Governance Procedural Requirements

3.1 Records Creation Phase

3.1.1 Upon formulation of a new organization or NASA program or project, managers/process owners over NASA offices should identify all planned systems or applications within their office that will contain Federal records.

3.1.2 RM considerations shall be addressed during the development and implementation of new business processes, programs, and projects by NASA Records Owners in coordination with their Center Records Manager. Situations and types of activities where RM considerations are relevant include:

- a. Data management planning and implementation, both long and short term.
- b. Organizational/mission changes that will result in creation of new records or re-purposing legacy records previously maintained by another organization/function or for another purpose.
- c. Continuous Process Improvement projects that will result in creation of new records or re-purposing of legacy records.
- d. Development, major upgrade, or acquisition of agency information systems/applications.

3.1.3 All records groups (series) that will be created in the new or modified business processes, programs, and systems projects shall be identified and assessed by Records Owners. The Records Owners should specifically identify:

- a. Where records will be stored/maintained -- physical location or EIS and where it is housed.
- b. Record series description and pertinent NRRS or GRS items citations.
- c. Unscheduled record series needing new or revised schedule items.
- d. Ownership and record custodianship for each record series.
- e. How and when each record series will be reviewed and cut off, or other external event that will trigger a change from record active use life-cycle phase to inactive use. This cutoff serves as the start point for required retention periods and calculation of authorized disposition dates.
- f. Appropriate access or use restrictions through consultation with suitable functional experts. Examples of such restrictions include International Traffic in Arms Regulations (ITAR), Export Control, Personally Identifiable Information (PII)/Privacy Act, Information in Identifiable Form (IIF), or other Controlled Unclassified Information/Sensitive But Unclassified (CUI/SBU).

Note: Reference: NPR 2190.1, NASA Export Control Program, ITS-HBK-1382.03-01, Privacy Risk Management and Compliance: Collections, Privacy Impact Assessments (PIAs) and System of Records Notices (SORNs), and NID 1600.55, Sensitive But Unclassified (SBU) Controlled Information.

(1) Restriction determinations for electronic systems based on the records content may be accomplished via Records or Systems Owners completion of Initial Privacy Threshold Analyses (IPTAs)/PIAs in the Privacy and Controlled Unclassified Information (CUI) Assessment Tool (PCAT).

(2) To ensure suitable restrictions are enforced throughout the life cycle, records shall be properly identified or "tagged" as they are created by the Records Creator in accordance with appropriate Agency policy for the particular restriction.

3.1.4 When embarking on a contractual or service agreement with a third party, the relevance of Federal records to the resultant partnerships shall be evaluated and addressed by requiring organization(s) as necessary, in consultation with the Center Records Manager.

3.1.5 This NPR establishes requirements to ensure records' reliability, authenticity, integrity, usability, and preservation content, context, and structure, as required by 36 CFR 1236. General requirements in NPR 7120.7 (currently NID 7120.99) require records management considerations to be addressed as part of the IT systems development project life cycle and in NASA's IT systems governance processes.

3.1.5.1 Managers/process owners over NASA offices should identify all systems or applications within their office that will contain Federal records. Such identification should be accomplished at the formulation of a new organization or NASA program or project.

3.1.5.2 In order to ensure the proper management, maintenance, and disposition of their records, Records Owners shall:

- a. Identify RM functional requirements for a system or application that is to house the records.
- b. Document administrative processes external to the system that will fulfill RM requirements in cases when a decision is made to use a system that fails to provide proper management of the records.

3.1.5.3 In accordance with NPD 1440.6 and NPD 2800.1, NASA System Owners are required to ensure that records controls are incorporated into any EIS that contain NASA records. Alternatively, controls may be integrated into a recordkeeping system or process that is external to the EIS itself.

3.1.5.4 System Owners and IT project managers shall address RM considerations and requirements in all projects utilizing the 7120.7 (currently NID 7120.99) IT Projects methodology, during which appropriate records management personnel (i.e., RLOs, Center Records Manager, or NASA Records Officer) should be consulted.

a. Appendix C contains a "Records Management Core Element Checklist" which may be used as a tool for assessing basic RM functionality during the early conceptualization and planning phases of NASA IT systems development/acquisition/refresh projects, as defined in NPR 7120.7. A more detailed explanation of the origin, purpose, and use of the Core Elements Checklist can be found in IT-HBK-1440.01.

b. When a decision during the early conceptualization and planning phase of an IT systems project is made to integrate RM capabilities into the design and development of a system itself, controls prescribed in 36 CFR 1236 shall be built into the system to ensure such properties as records' reliability, authenticity, integrity, and usability.

c. More information about RM functionalities that must be included in systems and applications is provided in IT-HBK-1440.01, along with elaboration of RM touch points in the IT Projects Life-Cycle Governance process and definition of RM criteria for determining readiness of the system to advance from one project development phase to the next. The handbook provides an assessment tool for a more in-depth records analysis and assessment from which one of three architectural or strategy options may be determined for recommendation to the applicable IT Systems Project Governance Board.

d. System Owners shall include costs of compliance with this NPR when developing the business case for a new or updated existing system.

e. When a decision is made to not include RM functionality in a new or updated system, an alternate plan for managing records external to the system shall be developed and presented at appropriate review gates.

3.2 Active Use Records Phase

3.2.1 Records Management roles during the active use phase of a records life cycle are those that help ensure or facilitate ease of access to record information for ongoing business/mission uses. This section addresses requirements for identifying records, where they are located, facilitation of their retrieval, and their protection.

3.2.2 Records accounting

3.2.2.1 To account for all the records for which an organization is responsible, a complete records listing shall be created and maintained by each organizational unit RLO. This listing is sometimes called a "records plan," "file plan," "Master Records Index (MRI)," or other similar names, in accordance with Center policies. These listings describe all the records series belonging to the organizational unit.

3.2.2.2 The listing should include the following minimum important information about each record series:

- a. Agency Filing Scheme (AFS) code. (Reference Appendix D.)
- b. Title or summarized description.
- c. Owning organization.
- d. Records custodian.
- e. Location (if paper/physical media records) or system/repository (electronic/digital media records) where records reside, even if in an EIS located at or run by another organization or Center.
- f. Pertinent NRRS or GRS retention schedule item.

3.2.3 Organizing records

3.2.3.1 A classification scheme (the AFS or its derivative) that can be used to logically categorize records holdings based on function or business process should be developed by each Center Records Manager or organizational unit RLO:

- a. For physical records, this scheme is used to organize record holdings in file cabinets, file rooms, or temporary records storage/staging facilities.
- b. For electronic records, the scheme is used in folder/directory structures and/or as keyword or metadata tags to accomplish the same purpose.

3.2.4 Locating records

3.2.4.1 Effective indexing and search methodologies that facilitate locating and retrieving records shall be implemented by Records Owners. Indexing/search approaches include, but are not limited to:

- a. Metadata tagging and keyword indexing such as AFS and/or other key identifying attributes that will be usable even after the records' active life has expired.
- b. Database search capabilities using either metadata/keyword tag criteria, full-text search, or a combination of both.
- c. "Federated search" technologies (allowing records to be located using any of the above methods across multiple repositories, Line of Business (LOB) systems and locations).

3.2.5 Protection and management of records

3.2.5.1 Proper RM controls that ensure records are managed and protected against unauthorized access, change, or destruction shall be established and documented by Records Owners in their office procedures for hard copy records or system IT security plan for electronic records. Controls will include, but not be limited to:

- a. Roles based access controls (i.e., user access to a system or its functionalities based on the role of the user).
- b. Safe and environmentally stable storage conditions to protect the record from unauthorized access, deterioration, other alteration, or destruction, with backup and restoration plans for records in EIS.
- c. Controls to ensure no one may destroy records outside of authorized channels and that destruction is accomplished only in accordance with approved records retention schedules.

3.2.5.2 Records may not be removed from the Agency, except in the course of official business or scheduled records disposition.

(a) A records clearance process for all outgoing NASA personnel, including management, shall be implemented by Center Records Managers to ensure proper transition of any records custody and prevent unauthorized removal of Federal records. The process should ensure officials and employees do not remove records from the Agency without Center Records Manager or NASA Records Officer approval, in accordance with 36 CFR 1222.18, except in the course of official business.

(b) Unauthorized removal of records from the Agency shall be reported following the procedural requirements set forth in 3.6.3.3.

3.2.6 Converting analog records to digital

3.2.6.1 When a NASA organization has a business need to convert legacy analog (paper/film) records to digital formats, the Records Owner and the Center Records Manager shall ensure the conversion is to NARA-preferred formats whenever possible and always in the case of permanent records. Records owners and Center Records Managers should consult the most current NARA preferences and/or format requirements published on its agency's Web site.

3.2.7 Identification, protection, and availability of essential/vital records

3.2.7.1 Identification, protection, and availability of essential/vital records in case of emergencies shall be ensured by Records Owners, working with Vital Records Managers, in accordance with 36 CFR 1223, NPR 1040.1, NASA Continuity of Operations (COOP) Planning Procedural Requirements and NPR 9660.1, Vital Financial Records for Emergency Operations.

3.2.8 Records of terminated projects or offices

3.2.8.1 In cases where organizations, programs, or projects terminate and records are not being transferred to another ongoing office, managers should follow Center procedures or Center RM direction for disposition of records that have not yet met their retention. Programs and projects may see IT-HBK 1441.01 for records disposition guidance.

3.2.9 Inter- or Intra-agency records transfers and loans

3.2.9.1 NASA Form NF-1786, Inter- or Intra-Agency Transfer of NASA Records Agreement, shall be completed by Records Custodians and associated Center Records Managers when there is a business need for custody of records to be transferred from one NASA Center, directorate, program/project office or business office to another, or from NASA to another Agency.

Note: Instructions for completing the form are on NF-1786.

3.2.9.2 When the Receiving Office represents a NASA Program/Project, and the records are received from another NASA Program/Project, the manager of the Receiving Office shall:

- a. Maintain the records in such a manner so as to retain the identity of the originating Program and/or Project.
- b. Dispose the records in accordance with the approved retention schedule indicated in the NF-1786 agreement when the records are no longer needed for active use.

(1) When the retention instructions are dependent upon Program completion, the completion date of the originating Program/Project shall be the disposition contingency date or records "cutoff" point discussed later in this chapter.

3.2.9.3 If the required transfer of custody is between two organizational units within a Center (or HQ), the Center or Headquarters Records Manager shall document the transfer using locally established policies and procedures.

3.2.9.4 There are occasions when Center history functions, Communications, or other offices have cause to loan records for displays or holdings by other repositories.

- a. NASA may loan temporary records without NARA approval in accordance with 36 CFR 1228. However, Center Records Managers shall ensure that such loans are documented in agreements between the loaning and receiving organizations that specify what records are being loaned, the duration and other conditions of the loan, and responsibilities for maintenance and return of the records.
- b. Any loan of permanent records outside of the Agency must be coordinated with Center Records Manager and approved by NARA, in accordance with 36 CFR 1218. Center Records Managers shall ensure conditions of the loan are documented in an agreement, to which NARA is a party, that specifies the records to be loaned, the conditions and duration of the loan, and how the records are to be maintained and returned.

3.3 Inactive Records Phase

3.3.1 If records (permanent or temporary) have fulfilled their active usefulness, but have not yet fulfilled their retention period, the Records Custodian shall coordinate with the Center Records Manager to determine the available records storage options and costs for storing the records until their retention period is fulfilled and they are due for disposition.

3.3.2 If permanent records have fulfilled their active use and have no further value to the Agency, the Records Custodians may coordinate with the Center Records Manager to initiate an early transfer to the National Archives. (See Disposition of Permanent Records in Section 3.6.4.)

3.3.3 In cases where organizations, programs, or projects terminate, records disposition may follow one of two processes. Programs and projects may see IT-HBK 1440.01 for program records disposition guidance.

- a. If records are transferring to another ongoing office, Records Custodians should follow requirements to document an Intra-Agency transfer. (See Section 3.4.9)
- b. If records are not transferring to another ongoing office, Records Custodians should follow Center procedures or Center RM direction for disposition of records in Sections 3.5.1 or 3.5.2.

3.3.4 Storage of inactive digital records.

3.3.4.1 The Center CIO shall provide guidance for periodic migrations to update both format and media of Center digital records so records remain retrievable throughout their life cycle. The National Archives and/or industry standards for migrating media should be consulted, particularly in the storage of permanent records.

3.3.4.2 Inactive digital records, regardless of whether of temporary or permanent retention value, shall be periodically migrated to current formats and/or systems by System Owners, in accordance with guidance from the Center CIO, to ensure the records are retrievable for the entire duration of their retention period, and so the Center is able to respond to any requests for the inactive records. This applies to records stored onsite or offsite at a Federal Records Center (FRC) or commercial storage facility.

3.3.4.3 There are several optional approaches for storing inactive digital records.

a. Online. Records Custodians may continue to maintain inactive records within the system where they reside until their retention period is fulfilled. If the system has some inherent RM functionality, retiring records may simply be a matter of changing the life-cycle phase state from active to inactive through the use of metadata tagging.

b. Offline or Nearline. Retirement of records to offline or nearline storage in order to avoid bogging down systems with unused records is often preferable and permissible as long as they are retained in such a way, including migration, that they may be located and retrieved in response to such need by the Agency.

c. Physical Media. Inactive digital or analog records may be moved to physical external media (e.g., removable hard drives, tapes, Compact Disc (CD), Digital Video Disc (DVD) for storage during completion of their retention period. However, Records Custodians/Records Owners shall ensure migration to current media to ensure records retrievability.

3.3.4.4 Records Custodians or Records Owners should utilize "cutoff points" based on the appropriate retention schedules, at which to take appropriate action to convert the records to an inactive state. Examples of cutoff points are project closeout, system decommissioning, contract final payment, or employment termination.

3.3.5 Storage of inactive paper or other physical records

3.3.5.1 A standard process for storing paper or other physical records shall be established by Center Records Managers with procedures for controlling records inventory, box or file retrieval, check-out/check-in, and disposition/destruction services.

3.3.5.2 Basic standard procedures are provided in IT-HBK 1441.01, Records Retention and Disposition, for retiring hardcopy records to the FRC which Center Records Managers may enhance with Center unique requirements.

Note: No transitory or nonrecord collections may be retired to an FRC, except through special agreement with NARA.

3.3.6 Tracking inactive records

3.3.6.1 Necessary records retirement documentation shall be completed by Records Custodians and/or RLOs, in coordination with their Center Records Manager in the preparation of a request to transfer or retrieve records.

a. Typical documentation may include a Center form, Standard Form (SF) 135, or online requests to transfer or retrieve records through NARA's online Archives and Records Centers Information System (ARCIS).

b. The records need to be accurately and adequately described in the transaction to ensure proper scheduling and retrieval, as necessary.

3.3.6.2 NARA ARCIS accounts and permissions may be provided by Center Records Managers in accordance with Center policy and procedures.

3.3.6.3 More detailed or standardized procedures and processing instructions for retirement of records to FRCs are provided in IT-HBK 1441.01, Records Retention and Disposition. The handbook includes details such as:

a. Authorized boxes/containers and packing instructions.

b. Shipping instructions.

c. Procedures for documenting chain of custody.

3.4 Records Disposition Phase

3.4.1 Disposition of records takes place after the inactive/retention phase is complete and records have fulfilled their full prescribed retention period. Disposition takes one of two forms, depending on whether the records are of deemed temporary or permanent value. Temporary records are destroyed; permanent records are transferred to the National Archives for permanent retention.

3.4.2 Retention Schedules

3.4.2.1 All NASA records shall be dispositioned only in accordance with NRRS 1441.1 or the GRS by Records Custodians or Records Owners.

a. NRRS 1441.1, NASA Records Retention Schedules, provides records descriptions and retention/disposition instructions for records unique to NASA. These retention schedules are approved by the Archivist of the United States and provide legal authority for disposition of the records. The schedules provide titles, descriptions, retention/disposition instructions, and the disposition authority for series of NASA records.

b. NARA's GRS provides records descriptions and retention/disposition instructions for records common to multiple agencies. Retentions in the GRS always require compliance, unless NASA requires the records for a longer period of time, in which case, the Agency submits our own retention schedule for approval by NARA and incorporation into the NRRS. For NASA users' convenience, the NRRS incorporates GRS schedule items identified as records NASA maintains. In those cases, the GRS is cited as the disposal authority in brackets beneath retention/disposal instructions within the NRRS.

3.4.2.2 If an approved retention schedule cannot be identified in either the NRRS or the GRS for a set of records, the records are considered unscheduled and shall be maintained as permanent pending the approval of a retention schedule. (Reference Section 3.6.5.3 for proposing a new/revised NRRS schedule.)

3.4.3 Disposition of Temporary Records

3.4.3.1 Most NASA records are of temporary value (i.e., they will eventually be destroyed/deleted) and the retention period is largely based on the Agency's business and legal need for them. This section contains requirements for both scheduled destructions and instances of unauthorized damage, destruction, or removal of records.

3.4.3.2 Scheduled destruction.

a. Suitable local procedures for routine/periodic reviews shall be developed and implemented by Center Records Managers to identify and initiate purging of redundant and unneeded records. In developing and implementing these disposal procedures, the following factors should be considered:

- (1) The ever-increasing volume of the organization's collected records and the resulting impacts on the ability to easily find/retrieve critically needed information.
- (2) Risks and legal liabilities associated with possessing and possibly having to produce unneeded/redundant records for investigations or litigation.
- (3) Risks and legal liabilities associated with possession of unneeded/redundant restricted access information and potential breaches of Privacy, IT Security, Export Control, or other statutory and regulatory provisions.
- (4) Additional difficulties and consequences of establishing records integrity/authenticity.
- (5) Costs of storing and maintaining records (including not only storage technology costs, but also IT staff resource costs to develop and support the organization's information storage infrastructure).

b. Center Records Managers shall develop local destruction authorization procedures for temporary records that have met their scheduled retention requirements and are stored in FRCs or commercial or Center storage. These procedures should address the following elements:

- (1) Initiation of the request for destruction authorization by the responsible RLO, custodian, or Records Owner.
- (2) A description of the record set and/or listing of individual records for which destruction authorization is being requested.
- (3) Identification of the applicable NRRS or GRS item authorizing destruction.
- (4) Concurrence by the applicable manager(s) of the organizational unit owning the records or, in the case of dismantled organizations, managers of the most logical office concerned with similar records.
- (5) Concurrence by Center Records Manager.
- (6) Concurrences by the Office of General Counsel (OGC) or Center Office of Chief Counsel (OCC), and/or other higher management official, as required by Center policy.
- (7) Instructions for how to handle records that are under a legal hold (destruction freeze). (Reference Chapter 4 of this NPR.)

3.4.3.3 Unauthorized damage, destruction, or removal of records.

a. Agencies are required by 36 CFR 1230 to promptly report any unlawful/unauthorized or accidental removal, defacing, alteration, or destruction of records in the custody of that agency.

- b. Regardless of the circumstances, as soon as damage, destruction, or removal is discovered, the Center Records Manager shall immediately provide the NASA Records Officer with initial notification of the incident with as much detail as is known.
- c. The Center Records Manager shall provide the same immediate initial notification to their local NASA OIG when the incident involves any suspected unlawful or unauthorized removal, defacing, alteration, or destruction of records. The OIG will instruct the Records Manager as to any additional information required.
- d. The Center Records Manager shall quickly gather necessary details and work with the Records Owner to draft a report that will go to NARA, forwarding the draft to the Records Officer. Further assistance for preparing such reports is provided in Appendix F, "Unauthorized Records Destruction Reporting Guidance."
- e. After review and refinement, the NASA Records Officer shall submit the report of the incident to NARA in accordance with 36 CFR 1230.14.

3.4.4 Disposition of Permanent Records

3.4.4.1 Records appraised by NARA as having historical significance and necessary to preserve NASA's legacy are deemed permanent and so indicated in the NRRS. These records are eventually transferred to the National Archives for permanent retention. General permanent records transfer procedures, including some that are specific to transfer of paper and other analog/physical media permanent records, are provided in NARA bulletins and guidelines, available on NARA's Web site (www.archives.gov/records-mgmt/bulletins).

3.4.4.2 All NASA transfers of permanent records shall be initiated by a Records Custodian or Center Records Manager via a Transfer Request (TR) in NARA's Electronic Records Archives (ERA). The TR will become the complete documentation of the transfer.

Note: Pertinent hyperlinks to information on ERA and instructions for creating a TR are available on the NASA RM Web site (http://inside.nasa.gov/ocio/information/info_recmgmt/index.html).

3.4.4.3 For electronic records, NARA's most recent guidance for transfer of permanent electronic records shall be followed.

3.4.4.4 In certain circumstances, NARA authorizes transfer of specifically designated collections of NASA permanent records to other archival/historical entities (e.g., Library of Congress, University Libraries, and Presidential Libraries). In such situations, the NASA Records Officer shall work with NARA and the designated receiving organization to develop transfer procedures that are agreeable to all parties.

3.4.4.5 When transferring records, the transferring organization may retain a copy of the permanent records for local use with the following considerations:

- a. The record copies should be clearly marked as "reference" to prevent the Center from attempting to transfer the records again at a later date.
- b. The Records Owner or relevant NASA Center must produce any copies of records in response to Freedom of Information Act (FOIA) or legal discovery requests.

3.4.5 Creation, Use, and Maintenance of NRRS

3.4.5.1 The NRRS 1441.1 shall be published and maintained within NODIS by the NASA Records Officer, in conjunction with the OCIO Directives Manager and/or the NODIS administrator. This includes publishing updates of the NRRS when "administrative changes" are made to a schedule item for which only notification to NARA is required rather than formal approval by the Archivist.

3.4.5.2 Local procedures for notification of Center personnel of NRRS updates shall be established by Center Records Managers. Possible techniques/processes for this purpose include:

- a. Posting links to NRRS 1441.1 on Center Records Manager Web pages.
- b. All employee or RLO e-mail distribution.

3.4.5.3 NRRS Schedule Changes. a. Proposals for new or revised retention schedules shall be submitted, as necessary, by Center Records Managers to the NASA Records Officer for NASA coordination, if needed, and NARA approval.

- b. For unscheduled records (i.e., records for which no retention schedule can be identified), a new retention schedule shall be proposed by the Records Custodian or RLO in coordination with their Center Records Manager.
- c. The Records Custodian or RLO should initiate required updates to NRRS 1441.1 in a timely fashion to ensure accurate and approved retention/disposition authorities for their records.
- d. Reference Appendix E for more detailed steps in the process for making changes to the NRRS.

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