

GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

CIO 1820.2
May 17, 2021

GSA ORDER

SUBJECT: GSA Records Management Program

1. Purpose. This directive incorporates by reference the [GSA Records Management Program Website](#) as the official employee reference vehicle for GSA's records management program, policy, and procedures. This directive provides additional direction on implementing recordkeeping requirements, and assigns responsibilities.
2. Background. To ensure compliance with the [Federal Records Act of 1950](#), as amended, and other applicable laws and regulations, GSA works with the National Archives and Records Administration (NARA) to identify and inventory records, appraise their value, determine whether they are temporary or permanent, determine how long temporary records should be kept, and under what conditions both the temporary and permanent records should be kept.
3. Cancellation. This Order cancels and supersedes [OAS P 1820.1, GSA Records Management Program](#), dated March 7, 2014.
4. Revisions.
 - a. Changed the Directive to reflect versioning and the moving of the Records Management Program from the Office of Administrative Services to the Office of the Chief Information Officer;
 - b. Updated outdated links;
 - c. Added a requirement to use the Enterprise Document Management System (EDMS);
 - d. Simplified record keeping processes and requirements;

- e. Updated references; and
 - f. Updated applicability section to include information about the Civilian Board of Contract Appeals (CBCA).
5. Scope and Applicability. The GSA Records Management Program applies to:
- a. All GSA Services and Staff Offices and Regional Components;
 - b. All GSA Contractors, subcontractors, individual corporations, and other organizations that process or handle GSA-controlled information; and
 - c. The Office of Inspector General (OIG) only to the extent that the OIG determines it is consistent with the OIG's independent authority under the Inspector General Act and it does not conflict with other OIG policies or the OIG mission; and
 - d. This Order applies to the Civilian Board of Contract Appeals (CBCA) only to the extent that it is consistent with the CBCA's requisite independence as defined by the Contract Disputes Act (CDA) and its legislative history.
6. Policy. In accordance with the Federal Records Act of 1950, as amended, and other applicable laws and regulations, it is the policy of GSA that every GSA employee and contractor follow all statutory recordkeeping requirements, including:
- a. Maintaining records and ensuring recordkeeping capabilities. These must exist in every office, program, and project with adequate training and authority given to staff to ensure recordkeeping requirements are met in all business systems, including cloud-based systems.
 - b. Prohibiting all employees and contractors from unauthorized access, use, alteration, or destruction/deletion of any record. Additionally, per [OMB/NARA Memorandum M-19-21](#), GSA requires all functions to use cost-effective opportunities to transition non-electronic business processes to an electronic environment except where regulations or requirements of the business activity do not allow for it.
 - c. Using secure methods for storing records before disposal. Electronic records that do not reside in GSA business systems, are no longer needed for business use, and require storage before final disposal, shall be stored in the GSA IT supported Enterprise Document Management System (EDMS). GSA business systems shall consider using the EDMS system if they hold GSA records and need more efficient or most cost-effective recordkeeping functionality.

7. Responsibilities.

a. Senior Agency Official for Records Management (SAORM). The SAORM is an executive within the GSA IT organization. As directed in [OMB/NARA Memo M-19-21](#), Agencies must "designate a Senior Agency Official for Records Management who is at the Assistant Secretary level or equivalent and has direct responsibility for ensuring that the agency efficiently and appropriately complies with all applicable records management statutes, regulations, and policy, including the requirements of this memorandum."

b. Agency Records Officer (ARO). The ARO works within the GSA Records Management Program within GSA IT. The ARO is GSA's expert for records management policy and NARA regulations, and the agency representative to other federal agencies on records management issues. The ARO's responsibilities include:

(1) Providing guidance on the day to day agency recordkeeping requirements outlined in [36 CFR Part 1222, Subpart B](#);

(2) Serving as the official GSA Records Management custodian of GSA's records transferred to NARA;

(3) Coordinating and approving GSA agency records disposition schedules changes and the transfer of permanent records;

(4) Representing GSA on the Federal Records Council and in other federal records organizations.

c. Senior Records Officer (SRO). SROs are members of the Records Management Program responsible for assisting with agency recordkeeping operations. Specifically, SROs are responsible for:

(1) Implementing Records Management policy and procedures, and assisting employees within specified areas of responsibility. A list of SROs is available on [InSite here](#).

(2) Working with employees to design and implement records management practices concerning projects, applications, systems, policies, and procedures.

d. Records Management Division. The Records Management Division, within the GSA IT organization, leads the Agency's records management program. It works with all employees and contractors to assist, where needed, in the development and

implementation of recordkeeping procedures ensuring the proper preservation of, and access to, agency records for the Agency's compliance with [44 U.S.C. § 3102](#) and all other applicable regulations. Under [44 U.S.C. § 3102](#), The Agency records management program must provide for:

(1) Effective controls over the creation, maintenance, and use of records in the conduct of current business;

(2) Procedures for identifying records of general interest or use to the public that are appropriate for public disclosure, and for posting such records in a publicly accessible electronic format;

(3) Cooperation with the [Archivist of the United States](#) in applying standards, procedures, and techniques designed to improve the management of records, promote the maintenance and security of records deemed appropriate for preservation, and facilitate the segregation and disposal of records of temporary value; and

(4) Compliance with sections 2101-2117, 2501-2507, 2901-2909, and 3101-3107, of this title and the regulations issued under them.

e. All GSA Employees. All GSA employees are records custodians who create and receive Agency records. They are responsible for:

(1) Managing the records (created and received) necessary to document the Agency's official activities and actions, including those records generated by GSA contractors in accordance with GSA recordkeeping requirements described in this directive and on the [GSA Records Management Program Website](#). All forms of communications and business information existing in both analog or digital form can be records and need to be treated as such. This includes social media posts, email, chat, instant messages and any other form of correspondence or business-related information.

(2) Destroying records only in accordance with approved records disposition schedules and never removing records from GSA without authorization from a supervisor or the record's custodian. Those reporting unauthorized destructions may be protected by the [Whistleblower Protection Act](#).

(3) Saving records for secure and efficient retrieval, and maintaining and disposing of personal materials and non-record materials separately from records.

(4) Identifying all records, in any format, in their possession, and transferring them to another GSA employee before separating from the Agency or transferring to another organization. Records which have met their disposition per appropriate records disposition schedules should be destroyed unless subject to FOIA, litigation, congressional preservative directive, audit, or other legal holds. Records containing PII must be appropriately/securely preserved and, when appropriate, destroyed.

(5) Taking annual records management training. Newly-hired employees and employees newly-detailed to GSA must take records management training within 60 days of their start date.

(6) Those responsible for signing official documents (signatory officials) have the additional responsibility to send record copies of documents signed by them to the office(s) responsible for the functions to which the signed document applies. The responsible offices must ensure that records are retained and disposed of as the law requires.

(7) Contractors and others doing work on behalf of GSA are required to take annual records management training, as appropriate, however, Contracting Officers can exempt contractors not involved in record-handling activities from records management training. Contracting Officers should consider the requirements set forth in [Records Management Language for Contracts](#) by NARA.

f. Subject Matter Experts for Project Recordkeeping (SME). Every project within the Agency must specifically assign an individual of the project to have the SME role. Project Managers can take this role themselves if it is appropriate for the size of their project. Responsibilities of the SME include maintaining and tracking the records in use and created by the project and ensuring the proper destruction, storage, or transfer of the records when the project ends. The SME is also responsible to assist with finding and holding records in their area of responsibility when needed for an audit, FOIA, litigation, or other information requests. For recordkeeping purposes, a project is any logical grouping of work undertaken to achieve a specific objective of the business of the agency. Projects can be identified as such or undefined. What they have in common is that they exist to achieve a specific business outcome and that agency records are created.

g. Supervisors. Supervisors have a primary responsibility for creating, maintaining, protecting, and disposing of records for their areas of responsibility in accordance with GSA policy. Supervisors' responsibilities include:

(1) Creating the records needed to ensure adequate and proper documentation of their areas of responsibility.

(2) Ensuring that a SME exists for each project under their supervision.

(3) Implementing procedures to protect records from theft, loss, unauthorized access, and unauthorized removal.

(4) Notifying the Records Management Division (records@gsa.gov) of changes that will result in establishment of new types of records, new uses of existing records, the transfer or termination of records no longer required, or a needed increase or decrease in the retention time of the records.

8. Explanation of Format. The GSA Records Management Program is web-based to facilitate information access through technology and to allow for updating critical changes in a timely manner. The intranet site is located on GSA InSite at <https://insite.gsa.gov/employee-resources/directives-forms-and-regulations/records-management>

9. Signature.

/s/ _____
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