U.S. General Services Administration

GSA Order: Records Management Program

CIO 1820.2A
GSA IT
records@gsa.gov

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.

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 temporary and permanent records should be kept.

Applicability:

The GSA Records Management Program applies to:

1. All GSA Services and Staff Offices and Regional Components.

2. All GSA Contractors, subcontractors, and other organizations that access, process, store or handle GSA-controlled information;

3. This order applies to 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

4. 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.

Cancellation:

This Order cancels and supersedes CIO 1820.2, GSA Records Management Program, dated March 7, 2014.

Summary of Changes:

Revisions:

1. Changed the Directive to reflect versioning and the agency's increased focus on Agency data as records. Additionally, more clarifying language is added to ensure the Agency's compliance with the Federal Records Act;
2. Updated links;
3. Updated references; and
4. Specifically includes records management responsibilities of those acquiring, developing and maintaining Agency technology systems.

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 acting on behalf of GSA follow all statutory recordkeeping requirements, including:

1. **Maintain records and ensure secure recordkeeping procedures**. Recordkeeping procedures must exist in every office, program, and project, to ensure proper records management of Agency records created and used on all devices (including mobile devices) and in all storage locations containing Agency records. Staff must receive adequate training and authority to meet recordkeeping requirements in all business systems, including cloud-based systems, and in all computer applications including in apps on mobile devices.

2. **Prohibit all employees and contractors from unauthorized access, use, alteration, and destruction/deletion of any record**.

3. **Use electronic processes whenever practical**. OMB/NARA Memorandum M-19-21 Transition of Electronic Records [PDF] requires you 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.

4. **Use secure methods for storing records before disposal**.

Electronic Business Systems needing more efficient and cost-effective storage shall consider using the GSA IT-supported Enterprise Document Management System (EDMS).

5. **Evaluate all data files and databases for your recordkeeping requirements and appropriately dispose of record material according to Agency Recordkeeping Schedules.** All data files and databases acquired, created, and maintained shall be evaluated for their recordkeeping requirements. Data files and databases combined with or used with other data files and databases may create new records that require separate scheduling and disposal.

Roles and Responsibilities:

Heads of Staff and Service Offices - All offices within GSA must ensure they have and maintain orderly processes for maintaining Agency records.

Senior Agency Official for Records Management (SAORM) - The SAORM is an executive within the GSA IT organization that has management responsibilities regarding the GSA records management program. 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."

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

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. View the [list of GSA's Records Management Program contacts](#); and

2. Working with employees to design and implement records management practices concerning projects, applications, systems, policies, and procedures particularly in the areas of organization, preservation and disposition.

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 Title 44 U.S.C., and the regulations issued under them.

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 per 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 and digital forms can be considered records and need to be treated as such. This includes social media posts, email, chat, instant messages, cell phone SMS texts and any other forms of correspondence or business-related information. Additionally, the technology used to create or receive a record (be it a cell phone, laptop, tablet computer, camera, monitoring device, or any other device) does not change the requirement that records be preserved. When preserving a record is difficult due to technology limitations, such as on a cell phone and in some applications, one must consider alternative preservation approaches such as cutting & pasting or taking a screenshot of messages and saving them in a file that can be preserved with related records. Guidance for preserving cell phone texts and chats as official records can be found here. Additionally, consider using a different technology in the future where preserving and/or exporting records is easier;

2. Destroying records only per approved records disposition

schedules and never removing records from GSA without authorization from a supervisor or the record's custodian. Those who report unauthorized destructions may be protected by the [Whistleblower Protection Act](#);

3.   Saving records for secure and efficient retrieval, using naming conventions when appropriate, and maintaining personal materials and non-record materials separately from records;

4.   Storing agency records in secure storage locations accessible only to appropriate team members and management;

5.   Not storing record copies of Agency records in personal storage locations;

6.   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 role. Records that have met their disposition per appropriate records disposition schedules should be destroyed unless subject to the Freedom of Information Act (FOIA), litigation, congressional preservative directive, audit, or other legal holds. Records containing Personal Identifiable Information (PII) must be appropriately/securely preserved and, when appropriate, destroyed;

7.   Having a records transfer meeting with the employee's supervisor, the employee's project recordkeeper, or a member of the GSA Records Management Program before leaving the Agency to ask any records management questions the employee may have and to ensure a proper turnover of all records in the employee's control and access to all systems and accounts to which the employee maintains control;

8.   Taking annual records management training. Newly hired employees and employees newly detailed to GSA must take the records management training on GSA Online University within 60 days of their start date; and

9.   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 GSA policy and the law require.

GSA Contractors - GSA contractors may be records custodians who create and receive Agency records. Contractors and others working on behalf of GSA must take records management training on GSA Online University, as appropriate, within 60 days of starting at GSA and annually as long as they remain a contractor to GSA.

Project Recordkeeper - Every project within the Agency must specifically

assign an individual from the project to manage all project records. Project Managers can take this role themselves if it is appropriate for the size of their project. Responsibilities of the Recordkeeper include maintaining and tracking the records in use and created by the project and ensuring the proper storage, destruction, and transfer of the records when the project ends. A best practice is to keep all project records existing outside of GSA Business Systems in a shared location, managed by the Recordkeeper, containing all recordkeeping copies of project records. The Recordkeeper 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. Recordkeepers act as custodians for these records. For recordkeeping purposes, a project is any logical grouping of work undertaken to achieve a specific objective of the agency's business. Projects can be identified as such or undefined. Also included in the category of projects is the management of buildings, real estate, fleets of vehicles, and any other functions of the agency if not already separately defined as or within a project. What they have in common is that they exist to achieve a specific business outcome and that agency records are created.

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 recordkeeper exists for each project under their supervision;

3. Ensuring records created under their supervision are properly maintained and destroyed or transferred to the National Archives and Records Administration (NARA), whichever is called for in GSA records schedules (all records transferred to NARA must be digital as of 07/01/2024);

4. Implementing procedures to protect records from theft, loss, unauthorized access, and unauthorized removal;

5. Notifying the Records Management Division (records@gsa.gov) of changes that will result in the establishment of new types of records, new uses of existing records, or a needed increase or decrease in the retention time of records;

6. Ensuring that employees take the annual records management training; and

7. Ensuring that new employees take records management training within 60 days of beginning employment, and meeting with employees leaving GSA (a records transfer meeting) during which time the supervisor will ensure all records-related questions of the departing

employee are addressed. Employees are responsible to properly account for their records and to turn over access and control of social media accounts and information systems that are under their control.;

GSA IT - GSA IT has a special role in records management due to its acquisition, design, development, and management of GSA IT Business systems and online public-facing systems. GSA IT is responsible to work with business system users and the Records Management Program to ensure every system for which it is responsible is associated with a records schedule to ensure that records concerning, and within, each system are properly preserved and disposed of according to the appropriate records schedule.

Website Managers - Establish and follow a records schedule for every GSA website managed, in accordance with GSA's Recordkeeping Guidance For Website Design, Development, Use, Maintenance and Decommissioning, and NARA Guidance on Managing Web Records.

Social Media Account Managers – Establish and follow clear procedures to ensure that social media content is properly saved and disposed of as required by Agency records schedules.

Contracting Officers - Follow FAR 4.7 (Contractor Records Retention), FAR 4.8 (Government Contract Files), and GSAM 504.8 (Government Contract Files). Where practicable, consider including NARA-recommended language in contracts.

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.

Signature:

__/s/_____   _____6/20/2024_____
David Shive   Date
Chief Information Officer
Office of GSA IT