

MPR 1440.2

REVISION N-2

EFFECTIVE DATE: January 27, 2017

EXPIRATION DATE: January 27, 2022

MARSHALL PROCEDURAL REQUIREMENTS

IS01

MSFC RECORDS MANAGEMENT PROGRAM

With Change 2 (5/11/20)

COMPLIANCE IS MANDATORY

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DOCUMENT HISTORY LOG

Status (Baseline/ Revision/ Change/ Revalidation/ Canceled)	Document Revision/ Change	Effective Date	Description
Revision	F	5/14/99	History log added with this revision; previous history contained in Directives Manager's Reference File. Directive is being revised to update authorities/references and organizational titles, add section on emergency vital records, and remove detailed information more appropriate for a guide or handbook.
Revision	G	8/16/99	Updated to reflect recent MSFC reorganization and resulting changes in organizational codes and documentation numbers.
Revision	H	12/16/99	Revised to incorporate specific definitions, responsibilities, and procedures for quality records formerly contained in MPG 1441.1A, "Control of Quality Records." Qualified use of ink for purpose of record legibility (3.2.1.1). Added step to procedure for disposition of records transferred to Records Staging Area. Added statement on historical records to Appendix C. Added new design procedures records to Appendix A; updated appendix title; minor updates to Appendix B information. Added definition for data manager (1.2). Clarified some definitions (1.16, 1.21); responsibilities (2.4.1, 3.1.3, 3.3.4 & 3.3.5). Minor clarification to project records requirements (2.1, 2.2.1.3, 4.1.1) and Appendix D. Removed restrictive word "quality" from P.1, P.2, 2.7, 2.8, 2.9 and 4.d in keeping with DCB review comments/approval that official records include all records.
Revision	I	5/29/01	Revised to clarify and incorporate in Appendix A the changes required by new ISO standard: added "education" and "skills and experience" to training item; added "MPG 7100.1 and MPG 7120.1" to contract review item; added "Design inputs" as a type; added "Results of design validation and any necessary actions" as a type; added "MPG 1280.7" to records of validation of processes. Renumbered chapters/appendices to comply with MPG 1410.2. Appendix B: updated locations of vital records for RS and CD. P.2 editorial change.
Revision	J	5/12/03	P.4.a. & 1.23 Corrected title. 1.8, 1.13, & 1.16 Added clarification. 2.2 Organization name change. 2.2.4 Added new responsibility, ref. NPD 1440.6. 2.4.1 and 2.4.2 Clarified statement of responsibilities. 2.5 Corrected title of manager. 2.7 Spelled out acronym. 2.9 Revised wording to conform to latest ISO standard. 3.1.3 Removed redundant word and made editorial correction. CH3.1 Changed fallout shelters to EOC. Appendix B Improved format and incorporated changes requested by record owning organization.
Revision	K	9/20/2004	Reformatted to MPR as part of action 04-DA01-0387. Appendix D. D.1 Changed Information Systems Department to Office of the Chief Information Officer. [On 7/27/07, administrative changes made to update Office of Primary Responsibility from AD01 to IS01, to update all organizational codes due to Center transformation realignment, to update directive numbers, and to update the FRC address.]
Revision	L	5/15/2009	Revised applicability statement and updated document to include MAF. Deleted current Appendices A and B and changed remaining appendices to Chapters. Per NPR 1400.1 3.4.c., moved References to Appendix B. Updated references to the appendices/chapters throughout the document and added "See" references as needed. Corrected paragraph numbering. Updated Table of Contents. Added NPR 1040.1, MPR 1600.1 and NARA GRS to P.4 Applicable documents list. Added MPR 1040.1 to references list. Included measurement/verification requirements and attempted to expand and/or clarify other requirements (especially for electronic records). Addressed NCR 1068. Combined Records Custodian responsibilities from section 2 and

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			Chapter 1 leaving the combined responsibilities in Chapter 1. Changed responsibilities for managing records plans to the RLOs and added requirement for annual submission of a consolidated organizational records inventory to the MRM. [On 6/29/09, at the request of the OPRD, the expiration date on cover was corrected to May 15, 2014.] [On 7/21/09, in response to an action by the Supervisory Workload Study team, the OPRD added “or designee” at CH3.1.1.]
Revision	M	12/18/2012	Major rewrite to conform to new requirements and formatting for directives per MPR 1410.2J and MWI 1410.1F; to provide clarity and remove duplicated requirements; to better separate responsibilities and procedures; to address MPR 1440.2-DEV01; and, to respond to NCRs 1490 and 1491 with respect to vital records.
Change	1	5/29/13	On 5/29/13, at the request of the OPRD, an administrative change was made to reflect that MPR 1040.3 and MPR 1040.4 expired and were not renewed. Updated name for MPR 1410.1. Also added note after paragraph 3.2.2 to identify where to find further instructions for filling out a records plan.
Change	2	4/28/2014	On 4/28/14, at the request of the OPRD, the following administrative changes were made in response to the annual review: P.3 & P.4 Corrected/updated references and/or URLs; removed MPR1600.1, added NPR 1600.2 and NID 1600.55. Throughout the document references to MPR 1600.1 were change to NPR 1600.2 (for classified records) or NID 1600.55 (for records with SBU information). Added note concerning use of term “essential records” by FCD-1. Appendix B, Added NID to the list of acronyms. Appendix E, Updated title of NPR 9660.1.
Change	3	7/9/2015	On 7/9/15, at the request of the OPRD, an administrative change was made to update title of NPR 1441.1 and add NRRS 1441.1 to reflect the fact that with revision E of NPR 1441.1, the NASA Records Retention Schedules were removed and put in a separate document (NRRS 1441.1).
Change	4	10/9/2015	On 10/9/15, at the request of the OPRD, an administrative change was made to address NCR 1804, text was added to document elevating records-related issues to upper management that cannot be resolved between the Center Records Manager and the organizational Records Liaison Officer and/or the Quality Management System Committee.
Revision	N	1/27/2017	Re-write to implement changes in NPD 1440.6, NASA Records Management and NPR 1441.1, NASA Records Management Program Requirements, including new separate document for the NASA Records Retention Schedules (NRRS 1441.1). Updated document titles/numbers and URLs as needed. Expanded Table of Contents, Added Appendices for “Tips for Working Legal Holds” and “Metadata for Electronic Records.”
Change	1	3/17/2017	On 3/17/17, at the request of the OPRD, administrative changes were made to Appendix D to update the retention schedules per NRRS 1441.1A, Change 1.
Change	2	5/11/2020	On 5/11/20, at the request of the OPRD, administrative changes were made to update links at P.4n., 3.2.2, 5.1.3, E.11, and E.12. Update MSFC Historian’s Office from the Public and Employee Communications Office to the Office of Communications. Replace “Notice of Intent to Destroy Records” memorandum with MSFC Form 4710 at 6.8.2. Add MSFC Forms 4708 and 4710 to D.1 Records.

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PREFACE

P.1 PURPOSE

To implement the Records Management and Vital Records Programs at MSFC required by 36 CFR Pts. 1220 – 1239, NPD 1440.6, NPR 1441.1 and NPD 1040.4. It defines responsibilities for the identification, maintenance, and disposition of the Center’s NASA-owned records and vital records.

P.2 APPLICABILITY

- a. This MPR applies to Center personnel, programs, projects, and activities, including contractors and resident agencies to the extent specified in their respective contracts or agreements. (“Contractors,” for purposes of this paragraph, include contractors, grantees, Cooperative Agreement recipients, Space Act Agreement partners, or other agreement parties.)
- b. This MPR applies to the MAF.
- c. This MPR applies the following: all mandatory actions (i.e., requirements) are denoted by statements containing the term “shall.” The following terms also apply: “may” or “can” denote discretionary privilege or permission; “should” denotes a good practice and is recommended, but not required; “will” denotes expected outcome; and “are/is” denotes descriptive material.
- d. This MPR applies the following: all document citations are assumed to be the latest version unless otherwise noted.

P.3 AUTHORITY

- a. Records Management, 36 CFR Pts. 1220 - 1239 (Chapter XII, Subchapter B), (URL: <http://www.ecfr.gov/>)
- b. NPD 1040.4, NASA Continuity of Operations (COOP)
- c. NPD 1440.6, NASA Records Management
- d. NPR 1441.1, NASA Records Management Program Requirements

P.4 APPLICABLE DOCUMENTS AND FORMS

- a. NPR 1040.1, NASA Continuity of Operations (COOP) Planning Procedural Requirements
- b. NPR 1600.2, NASA Classified National Security Information (CNSI)
- c. NPR 2810.1, Security of Information Technology

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- d. NID 1600.55, Sensitive But Unclassified (SBU) Controlled Information
- e. NRRS 1441.1, NASA Records Retention Schedules
- f. MGM 1440.1, Guidance for Vital Records Management
- g. MCP 1040.1, Center Continuity of Operations (COOP) Management Team (CCMT) Plan
- h. NASA Form 1786, Inter- or Intra-Agency Transfer of NASA Records Agreement
- i. MSFC Form 578, MSFC Records Transmittal and Receipt
- j. MSFC Form 2441, Records Plan
- k. MSFC Form 4538, Directorate or Program/Project Appointment of MSFC Organizational Records Liaison Officer
- l. MSFC Form 4708, MSFC Organizational Records Inventory Cover Sheet
- m. MSFC Form 4710, MSFC Records Destruction Concurrence Form
- l. Federal Continuity Directive (FCD) 1, Federal Executive Branch National Continuity Program and Requirements (URL: <http://www.fema.gov/guidance-directives>)
- m. National Archives and Records Administration (NARA), General Records Schedules (GRS) (URL: <http://www.archives.gov/records-mgmt/grs>)
- n. MSFC Records Management Web site (URL: <https://explornet.nasa.gov/community/ocio/msfc-records-management>)

P.5 MEASUREMENT/VERIFICATION

- a. Verification and measurement for compliance to this directive are tracked by the Marshall Records Manager (MRM) primarily through:
 - 1. Data available from the normal internal and external management system audits;
 - 2. Periodic internal spot checks, reviews, and organizational self-assessments;
 - 3. Records audits that are directed by the NASA Records Officer; and,
 - 4. Any other records audits that fall outside the normal quality management system audits.

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b. Records audits that are directed by the NASA Records Officer or fall outside the normal quality management system audits are coordinated, as directed, by and/or through the MRM with the assistance of the affected organizational Records Liaison Officer (RLO).

c. Testing and review of the Vital Records Program are accomplished as part of the annual testing and training of the COOP process.

P.6 CANCELLATION

MPR 1440.2N-1, MSFC Records Management Program, dated January 27, 2017.

Original signed by

Todd A. May
Director

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CHAPTER 1. RESPONSIBILITIES

Note: Reference NPD 1440.6 and NPR 1441.1 for further detail on and/or other responsibilities.

1.1 Center Director responsibilities with respect to Records Management are in NPD 1440.6, including designation of a Center Records Manager.

1.2 The Chief Information Officer (CIO), Office of the CIO (OCIO), or Deputy, institutes records management controls that:

1.2.1 Preserves important policies and decisions and prevents the accumulation of unnecessary files.

1.2.2 Maintains records economically and efficiently in such a manner that their maximum usefulness is attained. (Includes ensuring/facilitating access to information by NASA staff, Agency partners, and the public per NPD 1440.6.)

1.2.3 Preserves records of continuing value and properly disposes obsolete temporary records.

1.2.4 Incorporates records management and archival functions into the design, development or acquisition, and implementation of information systems (per NPD 1440.6 and NPR 1441.1).

1.2.5 Implements electronic records management in accordance with 36 CFR 1236 and 36 CFR 1234 (Reference NPD 1440.6).

1.2.6 Provides Center processes for migration of inactive digital records to updated formats and media to permit records retrieval throughout their scheduled life cycle (Reference NPR 1441.1).

1.3 Directors/Managers of Each MSFC/MAF Basic Organization and Program/Project implement the MSFC Records Management and Vital Records Management Programs within their respective organizations in compliance with the provisions of this MPR, its authority documents and including but not limited to:

1.3.1 Establish documented procedures/instructions for identification, control, storage/retrieval, protection/preservation, retention time, and disposition of their records (including NASA records that are contractor-held) throughout the lifecycle of the records.

1.3.2 Designate and ensure training of records personnel including:

1.3.2.1 Designation of an RLO responsible for records management in their organization (NPD 1440.6).

1.3.2.2 Designation of personnel as records custodians.

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1.3.2.3 Designation of qualified records liaisons responsible for (or to assist with) identifying and maintaining vital records within their respective organization.

1.3.2.4 Program/Project Managers designate/appoint a technical representative responsible for coordination of records management activities with the respective Program/Project RLO(s) (reference 1.3.2.1), or otherwise provide the RLO(s) and records custodians the technical assistance needed to appropriately plan the identification and disposition of all records for which the program/project is responsible.

Note: As used in this MPR, the term “Data Manager” means “technical representative” or other title depending on what the Program/Project Manager chose to designate or appoint.

1.3.3 Appropriately disposition all official records considering the potential historical significance of records and exercising particular attention to disposition of historical materials.

1.3.4 Work with the Office of the CIO with respect to incorporating records management requirements into information technology (IT) development/acquisitions. (Reference NPR 1441.1, 3.1.5)

1.3.5 Ensure that organizations generating statements of work for NASA contracts involving creation or maintenance of Federal records include:

1.3.5.1 Appropriate records management requirements in contracts in compliance with this MPR and its authorities.

1.3.5.2 Ensure that records are delivered to and/or captured by the Government.

1.3.6 Notify the MRM or MSFC Vital Records Manager of changes in RLO or organizational Vital Records Liaison appointments, respectively.

1.3.7 Manage any vital records within their areas of responsibility to include:

1.3.7.1 Identify, select, safeguard and maintain those records considered mission essential to reestablish operations after an emergency or disaster.

1.3.7.2 Ensure that vital records are updated within 30 business days, if changes occur more frequently than detailed in the established cycle.

1.3.7.3 Submit a consolidated listing and location (i.e., record inventory) of any organizational vital records to the MSFC Vital Records Manager at least annually.

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1.4 Office of the Chief Counsel (MSFC)

1.4.1 Issues notification and requirements of Center legal record holds necessitated by litigation or investigations (per NPR 1441.1).

1.4.2 Reviews records destruction packages received from the MRM for potential litigation holds. (Reference 6.8.3)

1.5 Director, Office of Procurement or designee, ensures that all contracts for which MSFC contractors generate and/or maintain NASA-owned records include the requirement that such records be managed and dispositioned in accordance with NPD 1440.6, NPR 1441.1, NRRS 1441.1, this MPR, and other applicable records regulations.

1.6 MRM administers the overall MSFC records management program in accordance with the responsibilities in NPD 1440.6 and:

1.6.1 Ensures Center records management policies and procedures are documented and made available to the Center user community.

1.6.2 Coordinates and/or communicates records activities with the organizational RLOs.

1.6.3 Coordinates periodic inspections, self-reviews, and audits of the records management program as requested and/or required by higher authority.

1.6.4 Works with organizational RLOs and/or the Quality Management System (QMS) Committee to resolve records-related issues.

1.7 RLOs and Program/Project Data Managers:

1.7.1 RLOs

1.7.1.1 Represent their organizations, programs, or projects to the MRM (per NPD 1440.6).

1.7.1.2 Implement records management procedures within their organizations in accordance with this MPR, its authorities, and organizational procedures including, but not limited to, developing file or records plans, conducting records inventories, conducting self-assessments, identifying appropriate retention schedules, and retiring and dispositioning of records.

1.7.2 Program/Project Data Managers coordinate records management activities with the respective Program/Project RLO(s), or otherwise provide the RLO(s) and records custodians the technical assistance needed to appropriately plan the identification, management/control, and disposition of all records for which the program/project is responsible.

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1.8 Record Owners and/or Custodians:

1.8.1 Maintain records assigned to them in compliance with documented procedures/ instructions for controlling records as outlined in this MPR, its authority documents, and any applicable Directive, Organizational Issuance (OI), or Program/Project plan.

1.8.2 Ensure that the records for which they are responsible are documented on an approved, up-to-date Records Plan (MSFC Form 2441).

1.8.3 Ensure applicable records access restrictions are associated with their records and appropriate protections implemented. (Reference NPR 1441.1)

1.9 Information System Owners. Per NPR 1441.1 Information System Owners are required to:

1.9.1 Identify records management as a documented requirement when developing or acquiring an electronic information system or automated tool that will create or maintain NASA records.

1.9.2 Implement processes to periodically migrate records within the system to newer formats to maintain records classifications, immutability, and retrievability.

1.9.3 Implement disposition of electronic records in accordance with the requirements of Records Owners and NPR 1441.1.

1.9.4 Coordinate system records management capabilities with their primary Center technical repositories' capabilities to provide an efficient and coordinated data management strategy that supports both engineering data and records management long-term storage, retrieval, and use case objectives.

1.10 The MSFC Historian, Office of Communications, in coordination with the MRM:

1.10.1 Provides guidance, per NPD 1440.6, in identifying and recommending for preservation, or the disposition of unusual accumulations of documentary materials, historically significant personal files of officials, or specialized collections of NASA or non-NASA records that could be significant to establishing the basis of the history of NASA programs and projects conducted at MSFC.

1.10.2 Refers material qualifying as records to the MRM for evaluation and disposition identification, consistent with NPD 1440.6, NPR 1441.1 and NRRS 1441.1.

1.10.3 Ensures that any collections maintained by the History Office are managed in accordance with approved schedules of the NASA Records Retention Schedules (NRRS).

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1.11 All MSFC employees or organizations that receive/create, maintain, and dispose of NASA records:

1.11.1 Identify and manage their records in accordance with this MPR and its authority documents.

1.11.2 Ensure records are marked with appropriate access restrictions when the records are created or issued. (Reference NPD 1440.6, 5.o(3)).

1.12 MSFC Vital Records Manager:

1.12.1 In coordination with the MRM and Center COOP Coordinator, facilitate the designation, maintenance, and protection of the Centers' vital records as defined in 36 CFR 1223.2. (Reference NPD 1440.6 and FCD-1)

1.12.2 Coordinate with the MRM and the MSFC Emergency Management Director (EMD) on policies and procedures for vital records.

1.13 Organizational Vital Records Liaisons:

1.13.1 Assist their director/manager in identifying, designating, and protecting vital records within their respective areas of responsibility.

1.13.2 Serve as the primary point of contact between their respective organization and the MSFC Vital Records Manager.

1.14 EMD, or designee:

1.14.1 Coordinate with the MSFC Vital Records Manager to identify and maintain an inventory of those vital records that are required to be preserved for use during an emergency situation and those required for resumption of business.

1.14.2 Secure in shelters or arrange access to protected resources for those vital records required by the Emergency Management Teams for conduct of activities during an emergency.

1.14.3 Designate and secure vital records required by Emergency Operations Center (EOC) personnel during the EOC operational phase of an emergency.

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CHAPTER 2. GENERAL RECORDS MANAGEMENT REQUIREMENTS

2.1 Documentation of Organizational Records Management Procedures/Instructions

2.1.1 Documented procedures/instructions that comply with this MPR and its authority documents shall be developed for the identification, control, storage/retrieval, protection/preservation, retention time, and disposition of their records (including NASA records that are contractor-held) by Directors/Managers of each MSFC/MAF basic organization and Program/Project or their designee. These procedures/instructions may be included in the documents which identify a process and its applicable records (e.g., directives and organizational issuances), a program/project plan and an approved records plan. These procedures/instructions are to include (but not limited to) processes for:

2.1.1.1 **Maintaining documentation of communications** that include substantive information about their activities that meet the definition of a record and has a retention of greater than 180 days. This includes phone calls (Reference 36 CFR Part 1222.), meetings, social media, e-mail (Reference NPR 1441.1 Chapter 5) and other means of communication.

Note: Per NPR 1441.1, instant messaging and text messaging services are not to be used for NASA business communications that rise to the definition of Agency records of retention value greater than 180 days. In the event that such communications occur in these media, reference NPR 1441.1 for how the content of and attachments to the message, together with date/time sent and distribution metadata, are to be saved in systems/locations where their protection, retention, and recovery can be ensured.

2.1.1.2 **Periodic review and destruction of temporary records** that have reached the end of their approved retention period in accordance with requirements specified in NPR 1441.1, the NRRS, this MPR, or other NARA regulations.

2.1.1.3 **Destruction authorization procedures for temporary records** that have met their scheduled retention requirements. Reference NPR 1441.1 for elements that these procedures should address.

2.1.1.4 **Access and Traceability of Records** to include (but not limited to) processes for identification of authoritative locations for the organization's records, access controls, file naming conventions, check-in check-out process, and transfer of records responsibilities when personnel change and/or leave (e.g., retire).

Note: Reference NPR 1441.1 chapter 3, Records Life-Cycle Governance Procedural Requirements, for further details. Requirements for vital records are found in Chapter 8 of this MPR.

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2.2 Appointment/designation of Records Liaison Officers, Records Custodians

2.2.1 The Center Director is required to designate a Center Records Manager and a Center Vital Records Manager per NPD 1440.6. The Center Records Manager and Center Vital Records Manager may be the same person.

2.2.2 Directors/Managers of each MSFC/MAF basic organization and program/project are required to designate and ensure training for an organizational RLO responsible for records management in their organization per NPD 1440.6.

2.2.2.1 A completed MSFC Form 4538 shall be furnished to the MRM with the name, job title, and organizational element of the appointed RLO, and alternate, for the organization as changes in the appointment occur, and/or as requested by the MRM.

2.2.2.2 The organizational RLO is the primary interface for the MRM to work records-related actions and/or issues specific to that organization. Issues/actions that cannot be resolved at the organization RLO and/or QMS Committee level may be elevated to organizational upper management and/or the Integrated Management System Council.

2.2.3 A custodian(s) shall be assigned by the responsible director/manager for each official record or collection of records for which their organization is responsible.

2.2.3.1 In the event of record custodian and/or organizational changes, the director/manager with the assistance of their RLO, shall protect and properly transfer records to a newly-appointed custodian or to the process supervisor if a new custodian has not been appointed.

2.2.4 Formal Records Management (RM) training will be offered by the MRM or designee at least annually. Informal training will be provided to the RLOs during regular records management meetings.

2.3 Records Management Requirements in Contracts, Grants, and other Procurement-type Agreements

2.3.1 The requirement that records be managed and dispositioned in accordance with NPD 1440.6, NPR 1441.1, NRRS 1441.1, this MPR, and other applicable records regulations shall be included in all contracts, grants, and other procurement-type agreements for which MSFC contractors will receive, generate, and/or maintain NASA-owned records. (Reference NPD 1440.6.)

2.3.2 Requirements for records management shall be included in all research and development (R&D) contracts for which MSFC contractors will receive, generate, and/or maintain NASA-owned records by the directors/managers of each MSFC/MAF basic organization and program/project, or their designee, that are requesting the R&D contract.

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Note: R&D organizations that submit requirements to the Office of Procurement to procure (i.e., contract for) needed R&D services or products need to ensure that records management requirements are also included for the R&D records that might be part of their contract. The records management requirements include compliance with NPD 1440.6, NPR 1441.1, NRRS 1441.1, this MPR, and other applicable records regulations.

2.4 Potentially Historical Material

2.4.1 If requested, guidance shall be provided by the MSFC Historian, in coordination with the MRM, in identifying and recommending for preservation, or the disposition of unusual accumulations of documentary materials, historically-significant personal files of officials, or specialized collections of NASA or non-NASA records that could be significant to establishing the basis of the history of NASA programs and projects conducted at MSFC.

2.4.1.1 Material qualifying as records shall be referred to the MRM for evaluation and disposition identification, consistent with NPD 1440.6, NPR 1441.1, and NRRS 1441.1.

2.4.2 Any collections maintained in the History Office shall be maintained by the MSFC Historian, or designee, in accordance with NRRS 1441.1, this MPR, and its authority documents.

2.5 All MSFC employees (civil servants and/or contractors) shall identify and manage their records in accordance with this MPR and its authority documents.

2.5.1 Per 36 CFR Sections 1222.18 and 1222.24, records shall not be removed from Agency custody without prior permission from the MRM and the NASA Records Officer.

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CHAPTER 3. CREATION/RECEIPT AND IDENTIFICATION OF RECORDS

3.1 Creation/Receipt of Records

3.1.1 Per NPR 1441.1, RM considerations are to 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. (Reference NPR 1441.1, chapter 3 for situations and types of activities where RM considerations are relevant.)

3.1.2 Records shall be created by originators of records (civil servants and/or contractors) in accordance with Marshall Directives, OIs, and other applicable regulatory requirements.

3.1.3 Records should be accurate, legible, and complete regardless of format or media and preserved/stored in a manner that protects their authenticity, integrity, and reliability (this is especially important with electronic and certain multi-media records).

3.1.4 Hand-written records should be prepared in dark, permanent ink or, in accordance with the record media, in a manner that preserves the legibility of the record for the full required retention period

Note: Black or dark blue inks are preferred since some colored inks fade over time. However, other dark colored inks may be used on records with a NARA-approved retention of less than a year.

3.1.5 Correction marks on hard copy records should be a simple, horizontal line drawn through the erroneous data. It is highly recommended that corrections be initialed and dated.

3.1.6 White-out, or a masking substance, shall not be used to make correction marks on hardcopy records.

3.1.7 If the originator/receiver is not also the record custodian, the records shall be submitted to the record custodian upon completion.

Note: Just because records have been submitted to, or stored in an electronic system (i.e., Documentation Repository, Windchill, Integrated Collaborative Environment, or SharePoint) does NOT automatically mean records management requirements have been met. Also, records made available to NASA/MSFC via a Web site or other non-NASA electronic system, is NOT considered “delivered” until/unless it is captured and appropriately stored on a NASA-owned system.

3.1.8 Per NPR 1441.1 (3.1.3.f.), records shall be properly identified, marked or “tagged” with appropriate access or use restrictions as they are created by the Records Creator in accordance with Agency policy for the particular restriction. If the restrictions change (i.e., increase or decrease) during the life of the records, the changes need to be noted on the records and metadata in any system in which they reside.

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3.2 Identification of Records and Development of Records Plans

3.2.1 Records custodians (with the assistance of their RLO or Office of Primary Responsibility (OPR) Program/Project Data Manager) shall identify the records for which they are responsible.

Note: Review of process requirements documents may help with identification of the records and with determination of whether you or another organization and/or person are responsible for the official record.

3.2.2 A records plan (MSFC Form 2441) shall be completed by the records custodian (with the assistance of their RLO or OPR Program/Project Data Manager) that documents the records for which they are responsible along with the NARA-approved retention schedules for those records.

Note: Additional instructions for filling out a Records Plan (MSFC Form 2441) can be found on the Records Management Web site (<https://explornet.nasa.gov/community/ocio/msfc-records-management>).

3.2.3 The completed plan shall be submitted by the records custodian to their RLO for review/concurrence (by the RLO) and approval by the custodian's manager.

Note: If the records custodian is a contractor, it is the civil servant manager they (or the records) support that approves the form.

3.2.4 Completed and approved records plans for the organization shall be maintained by the organizational RLO or OPR Program/Project Data Manager with a copy provided to the custodian for reference purposes.

3.2.5 Applicable records, retention schedules, disposition, and the organization(s) of record custodian(s) or a link (identification) to where this information is available shall be identified in the organization's Marshall Directives, program/project plans, and OIs.

3.3 Consolidated Organizational Records Inventories

3.3.1 A consolidated records inventory shall be prepared by the RLO or OPR Program/Project Data Manager(s) for the organizational element based on information in the organizational records plans that:

3.3.1.1 Lists all scheduled and unscheduled files.

3.3.1.2 Shows the description, arrangement, disposition instructions, and disposal authority of the records series.

Note: Per NPR 1441.1, unscheduled records are managed as though "Permanent," meaning they cannot be destroyed until NARA has appraised them and a new schedule has been established by NASA and approved by NARA.

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3.3.1.3 Follows the format provided by the MRM.

3.3.1.4 Provides other data elements as directed by the MRM.

Note: For example, the RLO for the OCIO prepares the consolidated inventory for all elements of the OCIO organization.

3.3.2 The consolidated records inventory shall be reviewed and approved (i.e., signed) by the manager/director, or designee, of the organizational element.

3.3.3 The approved consolidated records inventory shall be submitted to the MRM by the RLO(s) or OPR Program/Project Data Manager(s) at least annually or as called for by the MRM.

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CHAPTER 4. RECORDS MAINTENANCE AND USE

4.1 Records Retention Schedules. Only NARA-approved records retention schedules shall be used by MSFC/MAF employees (civil servant and/or contractor) to determine how long to retain NASA records.

4.1.1 Per NPD 1440.6, NRRS 1441.1 shall be used as the basis for record retention standards. If the records are not covered in the NRRS, and an appropriate NARA General Records Schedule (GRS) is available, the GRS schedule may be used (per NPR 1441.1).

4.1.2 Notification of changes to the NRRS will be made by the MRM via e-mail to the RLOs, a link on the Records Management Web page, and/or other MSFC Center notification methods (e.g., ExplorNet).

4.2 Unscheduled Records and Proposing Changes to a Retention Schedule

4.2.1 If records are not scheduled in either the NRRS or the GRS, or the established retention period for a series of records is deemed inappropriate, a proposed new or revised retention schedule shall be submitted to the MRM by the RLO or OPR Data Manager for coordination with the NASA Records Officer (Reference NPR 1441.1, Appendix E).

4.2.1.1 Unscheduled records shall be maintained/managed as permanent records until a retention schedule has been approved by NARA.

4.2.1.2 A proposed retention schedule shall not be used until it has been approved by NARA.

Note: According to the NASA Records Officer, if a proposed retention schedule has been submitted to NARA (by the NASA Records Officer) for appraisal, the retention may be used for planning purposes, but not for destruction purposes.

4.2.1.3 NARA-approved records retentions may be used even before they are officially incorporated into NRRS 1441.1.

4.3 Maintenance of Records

4.3.1 All identified records shall be maintained and controlled by record custodians according to NPR 1441.1, their records plan, applicable directives, OIs, and records management requirements to include:

4.3.1.1 Ensuring that active records are appropriately filed and readily retrievable. (Reference NPR 1441.1, section 3.2).

4.3.1.2 Maintaining all active records for customer review.

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4.3.1.3 Maintaining permanent records separate from temporary records, or segregable if electronic records.

4.3.1.4 Maintaining inactive records separate from active records.

Note 1: Sometimes it is necessary to remove material from inactive files and bring it forward to the current (active) files to complete documentation of a continuing transaction or case file. In such cases, the previously “inactive” files are now considered “active” since they are part of an active case file.

Note 2: It is highly recommended that inactive records be transferred to other less convenient storage (e.g., lower drawers or offline storage) to conserve office and/or computer/server space.

4.3.2 Cut off files at the end of the fiscal or calendar year, as applicable, and begin a new series.

4.3.2.1 For Program/project case files, cut off upon completion of project or sooner for long term programs/projects if authorized by the appropriate NRRS retention schedule.

4.3.2.2 Hold cutoff files in an inactive status until they are eligible for transfer or destruction.

4.3.3 Retire records from active filing systems when no longer current, inactive, no longer needed, and/or when projects are completed.

For example: Certain contract records would be removed from the current files when final shipment under the contract is received; others would be removed and transferred to the inactive file when final payment is made. Other records, such as personnel folders, would be removed from the current files upon the occurrence of a particular event; e.g., when an individual is transferred or separated.

4.3.4 Retire and purge records at intervals prescribed by the NRRS and this MPR.

4.3.4.1 It is highly recommended that records with a permanent retention be retired to the Center Records Management function each year. Reference copies of the records may be maintained by the retiring organization if needed for continued use or reference and if appropriately identified as “reference” copies.

4.4 Locating Records

4.4.1 Per NPR 1441.1, 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:

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- a. Metadata tagging and keyword indexing such as the Agency Filing Scheme (see NPR 1441.1, Appendix D) and/or other key identifying attributes that will be usable even after the records' active life has expired. (Reference Appendix G for list of metadata fields.)
- b. Database search capabilities using either metadata/keyword tag criteria, full-text search, or a combination of both.

4.5 Storage of Inactive Digital Records

4.5.1 Per NPR 1441.1, 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. The National Archives and/or industry standards for migrating media should be consulted, particularly in the storage of permanent records. (Reference NPR 1441.1, section 3.3.4 for further information.)

4.6 Digitization of Records

4.6.1 Per NPR 1441.1, 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 should consult the most current NARA preferences and/or format requirements which can be found on the NARA Web site (<https://www.archives.gov/records-mgmt/bulletins/>).

4.6.2 Digitization of permanent records does not automatically mean that the hardcopy records can be destroyed after the digital versions have been verified for quality and completeness. Organizations that want to digitize records that have a NARA-approved retention of "Permanent," shall consult with the MRM to determine if NARA approval is needed to destroy the hardcopy records after they have been digitized.

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CHAPTER 5. RETIRING AND TRANSFERRING RECORDS

5.1 Retirement of Records

5.1.1 To the greatest extent possible, records shall be maintained and dispositioned by organizations in their respective current files area(s) or information system(s).

5.1.2 Records staging areas (electronic and hardcopy) have been established at MSFC to provide limited facilities for the short-term economical maintenance of inactive unclassified files pending their scheduled destruction or retirement to an FRC.

5.1.3 To retire records to these designated staging areas, a completed MSFC Form 578 and associated index of the records shall be submitted by the originating organization's RLO or Data Manager to the MRM.

Note: Instructions for completing MSFC Form 578 are included with the form. There are also expanded instructions on the Records Management Web site which can be accessed through the Marshall Integrated Document Library (<http://midl.msfc.nasa.gov/>) or directly at https://repository.msfc.nasa.gov/docs/recmandocs/MSFC_Form_578_Instructions.pdf.

5.1.3.1 The OPR Data Manager and/or RLO should pre-coordinate with MRM or records management support contractor concerning transfer of records to the Records Management function.

5.1.3.2 Access restrictions that apply to the records (e.g., privacy act information, or export control restrictions) shall be noted on the MSFC Form 578 and index.

5.1.3.3 For hardcopy records, the appropriate completed access restriction form shall be placed on top of the records before the box is sealed and/or transferred. (Reference NID 1600.55 for appropriate form information.)

5.1.3.4 If space is not available at MSFC, the MRM may coordinate with the FRC for retirement of records from MSFC to the FRC for storage purposes.

5.1.4 Records in the MSFC staging areas, shall be maintained and processed, and reference services provided by records management personnel of the OCIO support contractor in coordination with the MRM.

5.1.5 Records located at MAF shall be maintained and processed, and reference services provided by the originating office or contractor to the extent provided in their contract, in coordination with the MAF RLO.

Note: Current details on how to transfer records to the MSFC records staging areas are available on the MSFC Records Management Web site.

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5.2 Retirement of Records to the FRC or National Archives

5.2.1 Retirement of records to an FRC or National Archives shall be coordinated by the MRM or the MRM's designee.

5.2.1.1 Retirement of records directly to an FRC from current organizational files areas may be approved by the MRM for large volumes of records and/or for certain personnel records.

5.2.2 Any offers of direct transfer of permanent records to the National Archives shall be coordinated through the MRM to the NASA Records Officer.

5.3 Transfer of Custody of Records to or from Outside the Center other than with the National Archives

5.3.1 Per 36 CFR Part 1231, records are not to be transferred from one executive agency to the custody of another without the prior written approval of NARA, except:

5.3.1.1 When records are transferred to the FRC or the National Archives in accordance with governing regulations.

5.3.1.2 When records are loaned for official use.

5.3.1.3 When the transfer of records or functions, or both, is required by statute, Executive Order, or Presidential reorganization plan, or by specific determinations made there under.

5.3.2 Any proposed transfer of custody of records either to or from MSFC, or its component parts (including contractor-run facilities) shall be coordinated through the MRM for approval by the NASA Records Officer prior to physical transfer of the records.

5.3.2.1 A completed NASA Form 1786, Inter- or Intra-Agency Transfer of NASA Records Agreement, shall be submitted to the MRM by the organization requesting the proposed transfer of records. This form is used to start the transfer approval process.

5.4 Transfer of Records Inside the Center Due to Changes in Organizations and Reorganizations

5.4.1 The unauthorized destruction of records is prohibited (see 6.2 of this MPR) and the movement and/or changes in records custodianship have to be accounted for.

5.4.2 Organizations should coordinate with the organizational RLO and/or the MRM when major changes in organization occur to ensure proper transition of records to a new organization and/or the proper disposition of the existing records within the original OPR.

5.4.2.1 Any disposition of records shall be in accordance with the NRRS and this MPR and coordinated through the organizational RLO and/or the MRM.

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5.4.2.2 New records plans and/or inventory shall be created for the new organization reflecting only those records now in its responsibility.

5.4.3 When designated records custodians are changed, records plans and organizational consolidated inventories shall be created/updated by the responsible organization(s) in coordination with their RLO and records custodian(s) to reflect change(s) in responsibility and show those records now within its care.

5.4.3.1 For major organizational changes, contact the MRM concerning providing records inventory for the new organization(s).

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CHAPTER 6. RECORDS DISPOSITION

6.1 General. It should be noted that “disposition” does NOT automatically equate to “destruction.”

6.1.1 Disposition of records takes different forms based on the type of file and the NARA-approved retention for records. Typically, once the specified retention period has been met, final disposition takes one of the following forms:

6.1.1.1 Permanent Records: Transferred to the National Archives.

Note: A reference copy of permanent records may be maintained by the Center if desired.

6.1.1.2 Temporary Records: Destroyed if there is not a legal hold (or freeze) on destruction. The method of destruction is based on the sensitivity of the information and the requirements in NPR 1600.2 and/or NID 1600.55.

6.1.1.3 Unscheduled Records: Maintained as permanent until a NARA-approved schedule is available. (Per NPR 1441.1)

6.1.1.4 Copies of official records: If the recordkeeping copy has been retired to storage, or dispositioned, then the copies are non-record material and can be destroyed when no longer needed. If the recordkeeping copy was not captured, retired and dispositioned, or was destroyed in a disaster/emergency situation, the copy, or best copy if multiple copies exist, by default becomes the recordkeeping copy and is subject to the required records retention period.

6.1.1.5 Non-record material: May be destroyed when no longer needed.

6.2 Willful and Unlawful Handling of Records

6.2.1 The penalties for the willful and unlawful handling, destruction, damage, or alienation of Federal records are contained in Chapter 101, 18 U.S.C., § 2071.

6.2.2 At MSFC, no records shall be destroyed without an approved disposition schedule unless prior assessment and approval has been received from the NASA Records Officer and NARA.

6.2.3 Requirements for reporting incidents are found in NPR 1441.1.

6.3 Emergency Authorization for the Disposal of Records

Section 10 of the Records Disposal Act (44 U.S.C., § 3310) authorizes disposal whenever it is determined that records constitute a continuing menace to human health or life or to property. Prior to disposal of Federal records, due to menace to human health or life or to property, approval is required to be obtained from NARA.

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6.4 Disposition of National Security Classified Files

6.4.1 Files that are National Security Classified (see NPR 1600.2 for description of classified information) shall not be transferred to the MSFC records staging areas.

6.4.2 Such files shall be retained in the current files area until downgraded, and then disposition effected in accordance with the applicable NRRS.

6.4.3 In the event of extenuating circumstances (e.g., emergency, natural disaster, or closure of the Center), the MRM will coordinate with the NASA Records Officer and the MSFC Protective Services Office (AS50) to identify an available appropriate storage facility for National Security Classified records that cannot be declassified.

6.4.4 Records containing National Security Classified information that are eligible for destruction shall be destroyed in accordance with the requirements contained in NPR 1600.2.

6.5 “Historical Records” (i.e., records kept beyond their established retention)

6.5.1 The retention of records beyond their established retention period is strongly discouraged.

6.5.2 If the established retention time is deemed inappropriate, the holding organizational RLO and record custodian need to work with the MRM to propose a new or changed retention schedule to be coordinated with the NASA Records Officer in accordance with NPR 1441.1. (See 4.2 of this MPR.)

6.5.3 The disposition and use of records that are retained onsite for reference purposes beyond their required retention period shall be the responsibility of the holding organization manager and are subject to any legal discovery actions.

6.6 Disposition of Files

6.6.1 Inactive (noncurrent) records shall be dispositioned by records custodians in coordination with the OPR Program/Project Data Manager and/or RLO in accordance with NPR 1441.1, NRRS 1441.1, this MPR, and other applicable directives, OIs and/or program/project plans.

Note: Records retentions in the NRRS take precedence over retentions listed in other documents unless there is documented authorization from the MRM.

6.6.2 The OPR Program/Project Data Manager and/or RLO should coordinate with the MRM to retire inactive records that have a retention of over 5 years to the Center Records Management function or to a Federal Records Center (FRC) as determined by the MRM.

6.6.3 Contact the MRM for assistance in handling of special records.

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6.7 Destruction of Temporary Records at End of Approved Retention

6.7.1 **For records in organizational files/systems**, destruction procedures for temporary records that have reached the end of their approved retention period (reference 2.1.1.2) shall be implemented in accordance with requirements specified in NPR 1441.1, the NRRS, this MPR, or other NARA regulations, with the following exception:

6.7.2 No records (regardless of format) pertaining to legal actions or litigations shall be destroyed without the express written approval of the MRM and the MSFC Chief Counsel even if the NARA-approved retention period has been met.

6.7.3 Physical destruction of records that contain controlled information and/or Privacy Act information shall be conducted in accordance with the requirements for the type of information contained in the records. (Reference NID 1600.55.)

6.7.4 OPR Program/Project Data Managers and/or RLOs should coordinate major bulk records destruction efforts of archived records through the auspices of the MRM.

6.7.5 **Be sure to check current security directives/regulations for destruction requirements** of certain types of information (e.g., Export Control; Privacy Act and Personally Identifiable Information; Sensitive but Unclassified; etc.). Records **SHOULD** be marked as to any restrictions on the information in them, but this is not always the case. It is better to be overly cautious when destroying records than to regret it later.

6.8 Records that have been officially transferred to the MSFC Records Management function or the FRC shall be dispositioned in accordance with established NASA retention schedules as identified by the retiring organization or the MRM.

6.8.1 The appropriate method of disposition will be determined by the MRM.

6.8.2 For records eligible for destruction, the MRM may initiate MSFC Form 4710, MSFC Records Destruction Concurrence Form, for signature concurrence from the originating organization or its successor in the event that the organization no longer exists.

6.8.3 Records destruction requests will be coordinated with the MSFC Office of the Chief Counsel for concurrence to ensure there are no legal reasons the records cannot be destroyed.

6.8.4 Exceptions to the retention requirements in the NRRS due to unforeseen circumstances (e.g., natural disasters or possible harm to human health) will be coordinated with the NASA Records Officer for approval from NARA. NARA approval needs to be received **BEFORE** destruction of any records.

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6.9 Documenting Records Destructions (reference NPR 1441.1)

6.9.1 Destruction of temporary records should be documented. Activities to clean/purge files typically take place at the end of the fiscal or calendar year but they can take place at other times during the year if needed. Organizations should keep a log of those activities. The log can be as simple as an Excel spreadsheet but it should contain basic information about the records such as:

- a. Description of Records
- b. Date range (e.g., FY 2014)
- c. NRRS citation (authority to destroy the records)
- d. Date destroyed
- e. Volume (if available)
- f. When/who authorized the destruction

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CHAPTER 7. PROGRAM FORMULATION AND MANAGEMENT RECORDS/CASE FILES

7.1 General Requirements.

7.1.1 All programs/projects that create or receive records that reflect the conduct of their mission are required to maintain their records as Administrative or Program records in accordance with NASA regulations and procedures (NPD 1440.6).

7.1.1.1 Each MSFC organization should be cognizant of the records they have been assigned to keep by the program/project through that program/projects Data Management Plan and ensure that such records are kept in accordance with NRRS 1441.1.

7.1.1.2 If an organization requires that additional records be kept that have not been specified in the program/projects Data Management Plan, then the organization shall document that requirement(s) in an OI specific to that program/project and ensure that those records are maintained in accordance with NRRS 1441.1 and this MPR.

7.2 Records that reflect a clear and complete history of each MSFC program/project from initiation through research, development, design, and testing, to completion and closeout shall be maintained by the directors/managers responsible for the planning, management, operation, and performance of R&D programs/projects and the management and operation of facilities.

7.3 A project case file plan shall be developed by each director/manager of MSFC/MAF programs/projects in coordination with their program/project Data Manager and RLO in accordance with the program/project Data Management Plan requirements, this MPR, or other records requirements.

7.3.1 This plan shall show in detail the specific records to be retained for each project and identify the organization/custodian responsible for such records.

7.3.2 A copy of the initial plan, with any revisions thereto, shall be forwarded to the MRM.

7.3.3 If requested, the MRM and/or Records Management support contractor will assist the program/project Data Manager and/or RLO in project case file planning and/or arranging for storage and retirement of files upon completion or cancellation of the project.

7.3.4 An annual audit or spot check to ensure that records are being kept according to their Data Management Plan shall be conducted by the program/project RLO and/or Data Manager.

7.4 In most cases, the project manager does not maintain the complete set of official records (i.e., the project case file) within their office but relies on a decentralized functional records system for the project.

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7.4.1 In a decentralized system, record files shall be maintained by the OPR, or appointed designee(s) performing the function in accordance with the program/project records requirements and Data Management Plan, thereby ensuring proper documentation in each field of endeavor.

7.4.2 Case files shall be maintained in a manner to be readily adaptable for use and so that, upon completion or cancellation of the project, the designated offices of record have readily implemented instructions for disposition of the records in their custody.

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CHAPTER 8. VITAL RECORDS MANAGEMENT PROGRAM REQUIREMENTS

8.1 Background

8.1.1 The terminology “Vital Records” should not be confused with other records management terms such as *official records*, *permanent records*, etc. Vital Records are the portion of all records (typically less than 7 percent); regardless of their formal retention requirements that need special protection against incidents and in disaster or emergency situations to ensure their ongoing availability for Continuity of Operations. Therefore, special measures, in addition to the normal requirements for records management and retention, are needed in the identification, preservation, and protection of Vital Records.

Note: Beginning with its October 2012 revision, the FCD-1 began using the term “Essential Records” instead of “Vital Records.” FCD-1 considers the term “vital records” to describe a subset of essential records that only deal with birth, marriage, and death documents. This change in concept of the definition of vital records has not been widely implemented across records management disciplines and/or documents; therefore, “vital records” as used in this MPR still refers to the full set of records as described in this section.

8.1.2 Vital Records fall into two categories: Emergency Operating Records and Legal and Financial Rights Records. (See Appendix A for definitions.) MGM 1440.1 provides additional guidance for the identification of Vital Records and examples of potential vital records.

8.1.3 Vital Records support and are an integral part of the MSFC Continuity of Operations (COOP) planning program (Reference NPR 1040.1). As such, the Vital Records Program shall be coordinated with, and as a part of, COOP and Emergency management planning activities.

8.2 Designation of Vital Records Liaisons

8.2.1 Qualified personnel shall be designated as vital records liaisons by directors/managers or designee of each MSFC/MAF basic organization and program/project to assist with identification, selection and management of vital records within their respective areas of responsibility.

8.2.2 Notification in writing of designations and/or changes in organizational vital records liaisons shall be forwarded to the MSFC Vital Records Manager as changes occur, and/or in response to a call for updates.

8.3 Selection of Vital Records

8.3.1 Vital records are to be carefully selected by MSFC/MAF managers/directors of basic organizations or program/project managers to assure compliance with NPR 1040.1, FCD-1, and this MPR.

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8.3.1.1 Selection shall be based solely on their necessity for carrying out MSFC emergency functions and/or protecting the legal and financial rights and interests of employees, while restoring normal operations or reconstitution after an emergency ceases. Selection criteria include but are not limited to the following elements:

- a. The impact of the total loss of a record on the ability of the activity to be reconstituted and to resume operation.
- b. The availability of the record, or the information in it, in other files outside of the laboratory or office that considers it vital (e.g., another building, library, other NASA Centers or a Federal Records Center).
- c. The specific planned need for the record during or immediately following the emergency.

Note: Additional guidance on selection of vital records is located in MGM 1440.1.

8.3.1.2 Selection shall not be determined by the archival or research value of the records.

Note: It is very possible that some organizations may not have any vital records. (Reference Appendix A for definition of vital records.)

8.3.2 An inventory shall be conducted by the organizational vital records liaisons, in coordination with their Director/Manager, to identify records vital to their mission essential operations and/or to the resumption of their business in the event of an emergency.

Note: Examples of vital records include, but are not limited to, emergency plans, disaster/recovery plans, COOP plans, procurement contract records, Chief Financial Officer reimbursable order books, and NASA financial subsystems. Other examples of potential vital records can be found in MGM 1440.1 for vital records.

8.3.3 Records which might potentially be considered vital should be reported to the organizational Vital Records Liaison, or MSFC Vital Records Manager, for consideration.

8.4 Risk Assessments

8.4.1 Documented risk assessments for all types of potential incidents and emergency situations shall be performed on the vital records (per FCD-1) by the responsible office, in coordination with their vital records liaison, to:

8.4.1.1 Determine preservation requirements including the media or form that the records need to be in for storage. This determination is essential since the time that the document will be needed determines the form that it needs to be in while in storage. Computers, microfilm readers, and printers may not be immediately available during an emergency; therefore, “quick reaction” records should, in most cases, be in printed or hard copy form.

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Note: Per FCD-1, it is strongly recommended that multiple redundant media be considered for storage of vital records. For example: depending on the risk assessment results, there may be a need for both hardcopy and electronic formats of a record.

8.4.1.2 Determine where the vital records are to be stored to make them available to meet the anticipated need.

Note: Of necessity, documented risk assessments and evaluations are an on-going effort in the identification of records in all locations and the risk hazard potential for the location. Not all records require preservation and protection in the same manner, nor is it feasible in all cases to provide for the immediate removal/movement of records to safe locations when an incident occurs or in an impending situation (such as a tornado).

8.4.2 Further guidance on risk assessments is in MGM 1440.1 for vital records.

8.5 Vital Records Inventories

8.5.1 A consolidated vital records inventory shall be submitted by each responsible organization that has vital records when requested by the MSFC Vital Records Manager.

8.5.1.1 Only those records meeting the criteria for Emergency Operating Records or Legal and Financial Rights Records (reference section 8.3 and Appendix A, Definitions, of this MPR, and MGM 1440.1) should be included on the Vital Records Inventory.

8.5.1.2 Vital records inventories need to be sufficiently descriptive to permit persons other than regularly-assigned employees to perform *essential* tasks.

8.5.2 As a minimum, the Vital Records Inventories shall include the following:

8.5.2.1 **WHAT:** The title of each records series containing vital information, its format and volume, and the method used to protect it.

8.5.2.2 **WHO** is responsible for the original, the vital record copies, and/or electronic information system(s), and sending the copies to storage.

8.5.2.3 **WHERE:** Location information for where the original information and the vital information copies are maintained; identification of systems that contain emergency operating vital records or vital records relating to rights; and, the physical location for offsite storage of copies of the records series or system, if applicable.

8.5.2.4 **HOW OFTEN:** The frequency with which the records are to be cycled (i.e., replaced or updated) and how they are to be updated.

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8.5.3 A review/update of the vital records inventories should be performed by the responsible organizations at a minimum annually and/or at intervals specified by either the Vital Records Manager or the EMD.

Note: If a national security emergency occurs, an obsolete record will be useless and could be detrimental to the continuation of the Agency's mission.

8.6 Maintenance and Storage of Vital Records

8.6.1 Based upon the anticipated need and the results of risk assessments, backup copies of vital records should be stored in the designated backup locations for the records by the responsible organization director/manager, or vital records liaison, so they are retrievable if an emergency or disaster destroys the originals. This includes:

8.6.1.1 Planning the media and location for storage as well as the method and schedule for transferring and cycling the copies of vital records to maintain currency.

8.6.1.2 Arranging for offsite storage, if needed, and periodic cycling (renewal) of copies of vital records in a facility not subject to the same emergency or disaster as MSFC/MAF, but still reasonably accessible to Agency staff.

8.6.1.3 Storing copies, whenever feasible, of emergency operating records in a properly equipped and environmentally-controlled EOC. However, an organization may store emergency operating records in another safe storage space including an FRC, if space is available and if recycling costs are reasonable.

a. If electronic files, databases or systems are identified as vital records, a systems contingency plan is required to be prepared as a section of the organization's security plan or as a separate document, in accordance with NPR 2810.1.

b. Records needed to protect legal and financial rights may also be stored at the FRC. Coordinate with the MRM to contact the FRC to ensure that appropriate environmentally-controlled space is available.

8.6.1.4 Updating, or cycling, the vital records based on the need identified in the vital records inventory to ensure that the most current version of the record is being maintained. Records may be cycled sooner if changes occur more frequently than detailed in the established cycle.

8.6.1.5 Coordinating with the MSFC Vital Records Manager and/or the EMD, as needed.

8.7 Retention of Vital Records

8.7.1 Vital records are typically copies (duplicates) and not the official records. However, in some cases, based on risk analysis decisions, the original records are not duplicated for vital record purposes.

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8.7.2 Vital records, original and copies, shall be dispositioned by the responsible organization director/manager, or vital records liaison, in accordance with the following:

8.7.2.1 Retention of vital records that are official records (i.e., not copies made just for vital records purposes) shall be according to the retention schedule as found in NRRS 1441.1 for the type of record per this MPR.

For example: Procurement contracts would be covered by the Procurement records retention requirements in NRRS 1441.1, schedule 5, item 1. Personnel records would fall under NRRS 1441.1, schedule 3, and so forth.

8.7.2.2 Retention of vital records that are duplicate copies of official records shall be as follows:

- a. If the original records are still intact (i.e., were not destroyed in an emergency event), the copies may be destroyed/deleted per the security methods prescribed for the type of information they contain.
- b. If, however, the original records were destroyed in the emergency event, then the copies by default become the official record-keeping copy and shall be retained according to the retention schedule as found in NRRS 1441.1.

8.8 Vital Records Training and Program Testing

8.8.1 Annual training on vital records shall be provided by the MSFC Vital Records Manager and/or the MSFC EMD per the requirements in FCD-1. This training may be provided via COOP training activities, instructor-led sessions, and/or online presentations.

8.8.2 Testing and review of the Vital Records Program shall be included as part of the annual testing and training of the COOP process.

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APPENDIX A. DEFINITIONS

(See also definitions in NPR 1441.1, Appendix A.)

Basic Organization. For purposes of this MPR, the term “basic organization” refers to those organizational blocks on the official MSFC Organization Chart, as approved by the NASA Administrator and signed by the MSFC Center Director (typically the organizational “01” level).

Case File. Records, regardless of media, documenting a specific action, event, person, place, project, or other matter. Include personnel, project, and transaction files, which are types of case files.

Current files area. The office space, or electronic system, where records are created and maintained or space utilized by a central files unit which maintains records for an individual, office, or group of offices.

Cycle. The periodic removal of obsolete copies of Vital Records and their replacement with copies of current Vital Records. This may occur daily, weekly, quarterly, annually or at other designated intervals.

Disaster/Emergency Situations. An unexpected occurrence inflicting distress or widespread destruction and having adverse effects on Agency or Center operations. An emergency is a situation or an occurrence of a serious nature, developing suddenly and unexpectedly, and demanding immediate action. This is generally of short duration, for example, an interruption of normal operations for a week or less. It may involve electrical failure or minor flooding caused by broken pipes. A disaster, on the other hand, means an unexpected occurrence inflicting widespread destruction and distress and having long-term adverse effects on Agency operations. Disaster and emergency planning is required to include the protection and preservation of vital records and address overall risk factors regarding the protection of all records.

Disposition. The actions taken regarding records no longer needed for current Government business. These actions include transfer to Agency storage facilities or FRCs, transfer from one Federal agency to another, transfer of permanent records to the National Archives, and disposal of temporary records.

Electronic record. Record that is stored in a form that only a computer or computer-driven device can process (also called machine-readable).

Emergency Operating Records. Records that support the execution of MSFC’s essential functions. (1) A type of Vital Records whose preservation and protection is required to be assured in disaster or emergency situations. They are essential to the continued functioning or reconstitution of an organization both during and after an emergency or disaster situation. (2) Emergency Operating Records include emergency plans and directives, orders of succession, delegations of authority, staffing assignments, selected program records that will be needed to continue the most critical operations, as well as the related policy or procedural records that will

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assist the staff in conducting operations under emergency conditions and for resuming normal operations after an emergency. Because of NASA’s mission, many facilities records may be considered vital.

Federal Records Center (FRC). A record storage facility operated by the NARA for housing and servicing noncurrent records of the Federal Government.

Legal And Financial Rights Records. (1) A type of Vital Records whose preservation and protection is required to be assured in disaster or emergency situations. (2) Legal and Financial Rights Records, also known as Rights and Interests Records, are that type of vital records essential to protect the legal and financial rights of the Government and the individuals directly affected by its activities. Examples include accounts receivable records, social security records, payroll records, retirement records, and insurance records. Contract Records may also be included.

Lifecycle. Record lifecycle refers to the “life span” or time period from the creation or receipt of a record through its useful life to its final disposition. The main stages in a records lifecycle are: creation or receipt, maintenance and use, and disposition.

Historical records. Records retained onsite beyond their required retention period, for reference purposes, and so identified. The ultimate disposition of historical records is at the discretion and responsibility of the holding organization.

Marshall Records Manager (MRM). The individual designated by the MSFC Center Director, as required by NPD 1440.6, who is responsible for overall administration of the MSFC records management program.

Metadata. Contextual information that describes the history, tracking, and/or management of an electronic document. Metadata elements provide administrative, descriptive, and technical information that describe the structure, context, and content of electronic records.

Non-record material. Materials such as 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, such as reading and suspense copies; materials of short-term value such as drafts and routing and transmittal sheets on which no documented administrative action has been taken; and stocks of publications and processed documents.

Offsite Storage. A potentially-secure location, remote from the primary location, at which inactive or vital records are stored. The FRC is an offsite storage facility where records are maintained prior to their disposition or transfer to the National Archives and Records Administration. Other locations may be chosen for the cycled preservation of active vital records to provide for their availability during and resumption of activities after an emergency or disaster.

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Office of Primary Responsibility (OPR). The organization having the responsibility for the process/procedures for the delivery of the product or services to the customer and/or for identifying which records need to be generated for the process/procedure and placed under control.

Onsite Storage. Storage location for vital records that is sufficiently protected to ensure their preservation in the event of a disaster or emergency.

Originator. Person or organization that creates the record.

Personal files. Personal papers or non-official records pertaining to an individual's personal affairs which are kept in their office or workspace. Documentary materials belonging to an individual that are not used to conduct Agency business. Related solely to an individual's own affairs or used exclusively for that individual's convenience.

Program/Project Data Manager. The person appointed to support a Program/Project Manager in the development and implementation of a specific program/project's data management.

Record copy or Recordkeeping copy. Usually the original of a record or the first-generation of the original which is maintained by the OPR in lieu of the original.

Record custodian. The individual responsible for collecting, indexing, accessing, filing, storing, maintaining, and dispositioning a record or collection of records.

Records. Includes all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government 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 Government or because of the informational value of the data in them. 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 are not included.

Records Inventory. The consolidated compilation of all custodian records plans within an organization. This is sometimes also called the organizational records plan or organizational records inventory.

Records Liaison Officer (RLO). An individual appointed to assist the director/manager and/or program/project manager of the organization in identifying, maintaining, and dispositioning records through records custodians.

Records Plan (MSFC Form 2441). An itemized list of all official records series maintained by a record custodian at any given organizational level providing a brief description of record content, arrangement, disposition instructions, and disposal authority.

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Records series. A group of records that relate to a particular subject or function, result from the same activity, document a specific kind of transaction, take a particular form, or have some other relationship arising out of their creation, receipt, or use. Records series as outlined in NRRS 1441.1 have the same retention schedule.

Rights and Interests Records. See *Legal and Financial Rights Records* and *Vital Records*.

Unscheduled records or files. Records or files that do not have a NARA–approved records retention schedule as identified in NRRS 1441.1, or NARA’s General Records Schedules. Per NPR 1441.1, these records are handled as permanent until a retention schedule is approved by NARA for them.

Vital Records. Essential records that are needed to meet operational responsibilities under national security emergencies or other emergency or disaster conditions, or to protect the legal and financial rights of the government and those affected by government activities. Only the most recent and complete sources of the information are vital records. There are two general types—Emergency operating records (i.e., vital to carrying out the essential functions of MSFC and NASA for the duration of a national emergency) and Legal and financial rights records (i.e., essential to the preservation of the legal rights and interest of individuals in cases where MSFC is the statutory office of record).

Vital Records Inventory. A list that identifies the records which have been determined to be vital, as well as other information about the records, including who, what, where, when, and how. It is a “one-stop” place providing information on how to locate, protect, and access vital information. Inventories of Vital Records identify not only the normal retention requirements and locations of records but also where backup copies of active records are stored and preserved for use in emergency or disaster situations.

Vital Records Manager. The individual designated by the MSFC Center Director, as required by NPD 1440.6, who is responsible for facilitating the designation, maintenance, and protection of the Center’s vital records.

Vital Records Liaison. An individual designated by the Director/ Manager of basic organizations to assist in identifying, prioritizing and managing the organization’s vital records. Sometimes referred to as the Organizational Vital Records Manager.

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APPENDIX B. ACRONYMS

CD	Compact Disk
CFR	Code of Federal Regulations
CIO	Chief Information Officer
COOP	Continuity of Operations
DVD	Digital Video Disk
EAR	Export Administration Regulations
EMD	Emergency Management Director
EOC	Emergency Operations Center
FCD	Federal Continuity Directive
FRC	Federal Records Center
GRS	General Records Schedules
IT	Information Technology
ITAR	International Traffic in Arms Regulations
KSC	Kennedy Space Center
MAF	Michoud Assembly Facility
MCP	Marshall Center Plan
MGM	Marshall Guidance Manual
MPD	Marshall Policy Directive
MPR	Marshall Procedural Requirements
MRM	Marshall Records Manager
MSFC	Marshall Space Flight Center
NARA	National Archives and Records Administration
NASA	National Aeronautics and Space Administration
NID	NASA Interim Directive
NPD	NASA Policy Directive
NPR	NASA Procedural Requirements
NRRS	NASA Records Retention Schedules
OCIO	Office of the CIO
OI	Organizational Issuance
OPR	Office of Primary Responsibility
QMS	Quality Management System
R&D	Research and Development
RLO	Records Liaison Officer
RM	Records Management
U.S.C.	United States Code

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APPENDIX C. VERIFICATION MATRIX (Reserved)

None

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APPENDIX D. RECORDS

D.1 The following records are maintained by the MRM:

DESCRIPTION	RETENTION PERIOD	AUTHORITY
Descriptive inventories, disposal authorizations, schedules and reports. Basic documentation of records description and disposition programs including, but not limited to the following completed forms and related documentation: <ul style="list-style-type: none"> • NASA Form 1786, Inter- or Intra-Agency Transfer of NASA Records Agreement • MSFC Form 578, MSFC Records Transmittal and Receipt (Permanent records) • MSFC Form 4710, MSFC Records Destruction Concurrence Form 	TEMPORARY: Retain onsite and destroy when no longer needed for reference or when 75 years old, whichever is longer.	NRRS 1/75/A/1/(b)
Correspondence, reports, authorizations, and other records that relate to the management of agency records, including but not limited to <ul style="list-style-type: none"> • Completed MSFC Forms 4538, Directorate or Program/Project Appointment of MSFC Organizational Records Liaison Officer • Completed MSFC Form 4708, MSFC Organizational Records Inventory Cover Sheet • Proposed Changes to NASA Records Retention Schedules • Approved organizational Records Inventories 	TEMPORARY: Destroy when 6 years old.	NRRS 1/75/C
Reference copies of MSFC Forms 2441, Records Plan	TEMPORARY: Destroy file plans/indexes when superseded.	NRRS 1/75/E

D.2 The following records are maintained by the organizational RLO or program/project Data Manager:

DESCRIPTION	RETENTION PERIOD	AUTHORITY
<ul style="list-style-type: none"> • Approved MSFC Forms 2441, Records Plan, for their organization • Copies of approved consolidated records inventories 	TEMPORARY: Destroy file plans/indexes when superseded. Destroy lists (shipping/transfer) when records thereon have been destroyed, or when the list is	NRRS 1/75/E

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<ul style="list-style-type: none"> Copies of MSFC Forms 578 and associated indices for records transferred to the Records Staging Areas 	no longer needed for reference.	
<ul style="list-style-type: none"> Self Assessments and other quality control reviews/audits with respect to records. 	TEMPORARY: Destroy when 5 years old.	NRRS 1/26.5/B

D.3 The following records are maintained by the MSFC Vital Records Manager:

DESCRIPTION	RETENTION PERIOD	AUTHORITY
Correspondence, reports, authorizations, and other records that relate to the vital records programs.	TEMPORARY: Destroy 3 years after project, activity, or transaction is completed or superseded.	NRRS 1/75.5/A

D.4 The following records are maintained by the organizational Vital Records Liaisons:

DESCRIPTION	RETENTION PERIOD	AUTHORITY
Vital Records Inventory; COOP annual review records; self-assessments and other quality control reviews/audits with respect to vital records.	TEMPORARY: Destroy 3 years after project, activity, or transaction is completed or superseded.	NRRS 1/75.5/A
<u>Copies</u> of records deemed essential to restore Agency/MSFC functions in case of emergency.	TEMPORARY: Destroy when superseded by the next cycle.	NRRS 1/75.5/B

D.5 Records maintained by the EMD with respect to vital records training/testing, after action reports, and a list of vital records (e.g., COOP plans) are documented in MCP 1040.1.

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APPENDIX E. REFERENCES

- E.1** Concealment, Removal, or Mutilation Generally, 18 U.S.C. § 2071 (Chapter 101 - Records and Reports) (URL: <http://www.gpo.gov/fdsys/search/home.action>)
- E.2** Disposal of Records Constituting Menace to Health, Life, or Property, 44 U.S.C. § 3310
- E.3** National Archives and Records Administration, 44 U.S.C. §§ 2101 – 2118 (Chapter 21)
- E.4** NPD 7120.4, NASA Engineering and Program/Project Management Policy
- E.5** NPR 1600.1, NASA Security Program Procedural Requirements
- E.6** NPR 9660.1, Vital Financial Records for Emergency Operations
- E.7** MPD 1280.1, MSFC Quality Management System Policy
- E.8** MPR 1410.1, Organizational Issuances
- E.9** MPR 1410.2, Marshall Directives System
- E.10** NARA Bulletin 2015-04, Metadata Guidance for the Transfer of Permanent Electronic Records (URL: <https://www.archives.gov/records-mgmt/bulletins/2015/2015-04.html>)
- E.11** NARA Bulletin 2014-04, Appendix A, Revised Format Guidance for the Transfer of Permanent Electronic Records – Tables of File Formats (<https://www.archives.gov/records-mgmt/policy/transfer-guidance-tables.html>)
- E.12** Marshall Integrated Document Library (URL: <https://explornet.nasa.gov/community/msfc/msfc-integrated-document-library-midl>)

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APPENDIX F. TIPS FOR WORKING LEGAL HOLDS

There is not a single “right way” to respond to e-discovery and/or legal holds for records. Each organization will need to work the action in a manner that best suits their organization. However, the following are a few general tips for anyone receiving or working litigation, e-discovery and other records-related legal type actions.

F.1 Read the action and background information (usually attached to the action). Be sure to note the following:

- **Scope of action**
- **Date range** mentioned
- **Contracts or company** names mentioned
- **Descriptions of the types of information being requested**

*Note: When the word “records” is used in an e-discovery/litigation hold, **they are often referring to ANY information, official record or not, that might pertain to their litigation.***

F.2 Forward the action and any background information to each office manager/lab director even if you are fairly certain there are no records in your organization (or certain parts of your organization) that might pertain to the action. That way you can document your organization’s “due diligence” concerning the action.

F.3 Forward the action to specific individuals or offices/labs if you are aware that they would have records related to the action.

F.4 Ensure “records centers” and/or databases are searched.

F.5 Consolidate any responses received from your organization; **forward** to your management (for concurrence); and, then to the person who is listed in the action as the recipient for responses.

F.6 Be sure to flag the records as being under a litigation hold (destruction freeze). This can be via metadata tags, special folders (electronic or hardcopy) for records under destruction freeze, or other similar methods that are readily recognizable to people accessing those records. Special considerations should be made for electronic records to protect them from destruction/deletion/automatic (system) deletion, etc.

F.7 Remember that Legal Holds/Destruction Freezes cannot be lifted until you receive written authorization from the issuing Office lifting the hold. At MSFC, that typically will be the MSFC Office of Chief Counsel.

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APPENDIX G. METADATA FOR ELECTRONIC RECORDS

G.1 For electronic records, appropriate indexing attributes (metadata) should be supplied for the records as they are created and reviewed/updated as needed (e.g., when access restrictions change). The table below contains a list of typical attributes (i.e., metadata) needed to enhance searching/locating information and which attributes are required for Records Management.

G.2 Transfer of records and associated attributes to Records Management is facilitated through the use of an Excel Spreadsheet template on which the records submitter lists the individual electronic files to be transferred and completes the indexing/attribute information. While some fields in the spreadsheet are not applicable to all document types and not all are required for Records Management, the more detail provided, the more information will be available for future researchers. (*Reference RM Web site for e-records index template.*)

Metadata Tag / Attribute		Description
File Path	Required (for bulk transfers to Records Management)	This is essentially the complete file name, preceded by any folders or subfolders if they are part of the file path from which the electronic file will be transferred. For example: \SpaceShuttle/MainEngine/parts/nozzle/nozzle_plans.pdf
Document Number [and Revision where applicable]	Required	A unique, alpha-numeric, pre-assigned number identifier of a document. Document Number refers to the Item numbers or names that are unique alpha-numeric designations usually assigned upon creation or approval of a data item. For most configuration-controlled data, such as technical documents and engineering drawings, the drawing number or document number will be used. For records that have not been assigned a document number, the electronic file name may be used as the Document Number. Retiring offices may also generate unique Item Numbers/Names for data items provided they follow a logical organization and alpha-numeric sequence. <i>Note: Item numbers should be unique, and not a duplication of any other designation associated with the item, such as a Data Requirements Number, Configuration Control Board Number, or Contract Number.</i>
Revision	Required, if applicable	Revision refers to an associated number and/or letter designation indicating change sequence to a previous version of the document.
Title	Required	Title of the data item as it appears on the item, usually on the cover sheet. If no title is provided on the data item, submitters should provide one that adequately describes the data item.
Subject	Optional, but Recommended	This attribute field may be used by data submitters to further identify data items in addition to the indexing attribute fields already provided.
Authors	Required, if available	This attribute field should be used by data submitters to identify the author of the data item, if known. (Last name, First name)
Keywords	Optional	This attribute field may be used by data submitters to further identify data items in addition to the indexing attribute fields already provided.

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Metadata Tag / Attribute		Description
Center	Required	NASA Field Center (or Headquarters) of the organization assigned responsibility for the records (Office of Primary Responsibility). Acronyms, such as MSFC or KSC, are the preferred format.
Contract Number	Required, if applicable	If applicable, the NASA Contract Number under which the data was created.
Contractor Name	Required, if applicable and available	If applicable, the name of the contractor (company) that produced the data.
Creating Office	Required, if applicable	If different from Office of Primary Responsibility (OPR), MSFC Organization that created the data or if contractor-produced, for which the data was created. Complete if different from the Office of Primary Responsibility.
Document Date	Required	Date of the data item as it appears on the item , usually on the cover page, not the date the item was entered into the system. (The date on the item should be entered as MM/DD/YYYY.) If date is unknown, best estimation of date, but must be valid calendar date. Example: An approximate date for "sometime in April 2002" would be 04/01/2002, not 04/2002 or 04/00/2002. (Note: For technical data, Effective Date and/or Release Date may also be appropriate attribute items as separate, designated fields.)
Office of Primary Responsibility	Required	MSFC Organization that has assigned records responsibility for the data item, usually the creating office. Organization codes are preferred format.
Project	Required for projects	NPD 7120.4, "NASA Engineering and Program/Project Management Policy," provides the following definition for projects: "Projects are significant activities within a program having defined goals, objectives, requirements, life-cycle cost estimates, a beginning, and an end." Other criteria that may be considered are: if the activity at one time or another had an established Program/Project Office at MSFC, or if the activity had a unique Configuration Control Board code. If a well-defined sub-project or element is associated with the record, provide the Project and follow with a dash and the subproject or element (example: ECLSS-WRS). If more than one project is applicable to the data item, choose "Multi-project/Multi-program." If no project is applicable to the data item, choose "Not applicable."
Restriction	Required	Official and authoritative access restriction(s) that apply to the record. Identify any controls to access, such as security classification, SBU, or other restrictions identified in NPR 1600.1. (e.g., EAR/ITAR, EAR, EAR-99, ITAR, Limited Rights Data, NASA Sensitive, and None)
Media Type	Required	Physical container of the document/data item, e.g., paper, microform, diskette, CD, DVD, data tape, videotape, hard drive.
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