

BPA Policy 236-12

Large Aggregate Flexible Schedule and Agency File Plan

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1. Purpose & Background

- A. This policy identifies the disposition authority for BPA’s records and describes how they are organized.
- B. BPA uses a Large Aggregate Flexible Schedule (also known as a “Big Bucket”) schedule to organize its records and ensure they are retained for the appropriate time period under the Federal Records Act. BPA’s Large Aggregate Flexible Schedule consists of twenty-four business function categories including the General Records Schedule (GRS) for all government agencies published by the National Archives and Records Administration (NARA). The business function categories are further divided into a total of ninety-seven records schedules covering all Federal records created, received, or identified by the agency. BPA’s Large Aggregate Flexible Schedule was signed on May 15, 2008 by the Archivist of the United States; it supersedes all existing records schedules including those that were then pending NARA approval.

2. Policy Owner

The Executive Vice President of Compliance, Audit, and Risk Management has overall responsibility for this policy. The Agency Records Officer within Information Governance develops, implements and manages this policy on behalf of the Executive Vice President of Compliance, Audit, and Risk Management.

3. Applicability

This policy applies to all recorded information created, received, or identified by BPA and the systems in which recorded information may be created, maintained, or stored. All short-term records, Federal records, and Structured Electronic Information Systems (SEIS) that maintain recorded information of BPA shall be assigned a file code from the Agency File Plan.

4. Terms & Definitions

- A. As used in this policy, the following terms and definitions apply:
 - 1. **Agency File Plan:** The systematic method of identifying specific types of records that are maintained, series descriptions, and disposition authorities. The Agency File Plan maps to the Large Aggregate Flexible Schedule approved by NARA for BPA.
 - 2. **Archivist of the United States of America:** As head of the National Archives and Records Administration (NARA), the Archivist of the United States establishes standards for retention, issues regulations, and provides guidance to all Federal

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agencies. The Archivist’s determination constitutes mandatory authority for the final disposition of all Federal records.

3. **Big Bucket:** See LARGE AGGREGATE FLEXIBLE SCHEDULE.
 4. **Electronic Information System (EIS):** Computerized/digital means for collecting, organizing, and categorizing information to facilitate its preservation, retrieval, use, and disposition. These systems contain and provide access to Federal records and other information.
 5. **Large Aggregate Flexible Schedule:** A form of retention schedule and disposition authority allowed by NARA for Federal records that consists of items covering multiple related series of records. BPA uses the Large Aggregate Flexible Schedule (“The Big Bucket”) that is arranged by business function. The Large Aggregate Flexible Schedule maps to the Agency File Plan, which is arranged by sub-function and retention.
 6. **National Archives & Records Administration (NARA):** The Federal agency responsible for appraising, accessioning, preserving, and making available permanent Federal records.
 7. **Office of Record:** The organization, by definition of its mission or function, that has primary responsibility for maintenance and retention of the record.
 8. **Information Asset Plan (IAP):** Used to identify the information assets and file series for which an organization has been identified as being “Office of Record” in the Agency File Plan. The Information Asset Plan also contains additional information about the medium, location, and other aspects of each organization’s information assets.
 9. **Structured Electronic Information System (SEIS):** Electronic information systems (EIS) used by BPA to collect/maintain data or records in a structured format, typically a database. As part of the System Lifecycle (SLC) process, the IGLM team reviews and approves these systems for use at BPA. Electronic Recordkeeping Systems (ERKS) are a sub-set of SEIS that meet additional records compliance requirements.
- B. As used in this policy, the following acronyms apply:
1. **EIS:** Electronic Information System
 2. **GRS:** General Records Schedule
 3. **IGLM:** Information Governance & Lifecycle Management
 4. **NARA:** National Archives and Records Administration
 5. **RRS:** Records Retention System

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6. **SEIS:** Structured Electronic Information System

5. Policy

- A. In accordance with 44 USC §3303, the head of each agency is required to submit a record schedule on standard form SF-115 (Request for Records Disposition Authority) identifying retention periods for the Federal records in the custody of the agency to NARA for approval. BPA has fulfilled this obligation through its approved Large Aggregate Flexible Schedule (also known as a “Big Bucket”). The current approved SF-115 for BPA’s Large Aggregate Flexible Schedule is designated N1-305-07-01. See 236-12.8.A.
- B. The ninety-seven sub-sections of the Large Aggregate Flexible Schedule form the basis for the Agency File Plan, which categorizes record series by function using a two-part file code categorizing the content covered by the file codes, and assigning a retention period as well as other parameters for organizing and maintaining those records. All Federal and short-term records of the agency shall be assigned a file code from the Agency File Plan and be listed accordingly in each organization’s Information Asset Plan.
- C. All organizations shall file an Information Asset Plan with the IGLM team at least tri-annually and must be approved by the Agency Records Officer; approval may be delegated by the Agency Records Officer to a member of the Information Governance organization. The Information Asset Plans are used to identify all file codes for which an organization is the Office of Record, as well as the media, location, and other information about the organization’s records. The IGLM team works with organizations when updating their Information Asset Plans. Procedures for updating and filing an Information Asset Plan are detailed in the procedures associated with this policy.

6. Policy Exceptions

- A. Exceptions to this policy may be necessary based on legitimate business needs, legal, or compliance requirements. Any exceptions must be documented, reviewed, and approved by the Office of Record, IGLM, and IT.
- B. Transitory recorded information does not require a file code. Short-term records require only the primary file code. See BPA Policy 236-11 Information Lifecycle Management section 236-11.8.C.

7. Responsibilities

- A. **Agency Records Officer:** Manages the IGLM program and develops, issues, and enforces policies for managing BPA’s information assets through their lifecycle to ensure compliance, reduce risk, and improve operational effectiveness and efficiency.

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- B. **Information Governance:** The IGLM team within Information Governance coordinates the overall IGLM program. Provides guidance and assistance to all BPA organizations with lifecycle management, and coordinates required records reviews, evaluations, and reports.
- C. **Information Governance Oversight Team (IGOT):** Reviews and approves any proposed changes to BPA’s Large Aggregate Flexible Schedule prior to submission by the Agency Records Officer of an SF-115 to NARA.
- D. **Managers/Supervisors:** Effectively manages information assets within his or her area of responsibility in a consistent manner to ensure the integrity, security, and availability of information assets.
- E. **BPA Employees/Contract Personnel:** Ensure that information assets they create, receive, or use in the performance of their daily activities are managed efficiently and in accordance with BPA policy.

8. Standards & Procedures

A. Large Aggregate Flexible Schedule (Big Bucket):

1. Each section of the Large Aggregate Flexible Schedule describes a business function of BPA and its associated Federal record types. (See the [Information Governance and Lifecycle Management website](#) for the list of business functions.) The business function sections are divided into subsections identifying temporary and permanent Federal records according to retention period ranges. Retention period ranges should be designed to avoid both overlaps and gaps.
2. BPA reviews its Large Aggregate Flexible Schedule on a five-year cycle beginning on the date of approval for N1-305-07-01 (May 15, 2008) to ensure the continued validity of the business function categories and associated record schedules. The review is performed by the IGLM team in conjunction with stakeholders for the business functions.
3. Any proposed revisions to the Large Aggregate Flexible Schedule or additional SF-115 records schedules must be reviewed and approved through the process described in the procedures associated with this policy. The revisions must include as an attachment a table identifying all current file codes and their disposition authority under the Large Aggregate Flexible Schedule. The Agency Records Officer is identified as the Agency Representative for the purposes of the SF-115.

B. Agency File Plan:

1. To provide sufficient flexibility in organizing, maintaining, and disposing its records without requiring changes to the Large Aggregate Flexible Schedule while meeting

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its obligations under the Federal Records Act, BPA uses an Agency File Plan. The Agency File Plan is arranged in chapters by business function/record content as identified by a categorization code in the form of a three-digit category. (See the [Information Governance and Lifecycle Management website](#) for a list of categorization codes.) Each chapter is sub-divided into a series of file codes that provide a description of the content encompassed by the category code and a retention period as well as other requirements for maintaining the record. File codes are identified using the category code plus an identifier for the retention period.

2. The IGLM team manages and publishes the Agency File Plan using the Records Retention System (RRS), a database SharePoint list. The IGLM team ensures that the Agency File Plan:
 - a) Is organized consistently to reflect current BPA business functions and activities;
 - b) Provides appropriate disposition authority according to the Large Aggregate Flexible Schedule;
 - c) Does not include needlessly duplicative file codes where the business function or activity is similar;
 - d) Does not include needlessly duplicative file codes where the retention and disposition requirements are the same; and
 - e) Accurately describes the content of the records subject to the file code including special maintenance, security, and disposition requirements.

3. All entries within the Agency File Plan must include the elements listed below:
 - a) A file code with a category and retention identifier;
 - b) A title and description sufficient to identify the recorded information that must be managed according to the given file code;
 - c) Identification of the organizations that maintain the records within the file code. A “Z” code listed in the entry denotes that all organizations may maintain records within that file code;
 - d) Identification of one of the ninety-seven schedules listed in the Large Aggregate Flexible Schedule or a GRS as its disposition authority (listed as “retention schedule”); and
 - e) Information on the retention period and whether the retention is triggered by an event (i.e., an “active plus” file code).

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4. The IGLM team works with business functions and organizations to ensure the Agency File Plan is up-to-date and reflects regulatory requirements as well as business needs for information lifecycle management. Any changes to the Agency File Plan must be approved by the Agency Records Officer. Procedures for updating the Agency File Plan are detailed in the procedures associated with this policy.

9. Performance & Monitoring

- A. The IGLM team within Information Governance is the responsible organization for the performance standards and monitoring plans contained in this policy.
- B. **Performance Standards**
 1. Valid disposition authority from NARA
 2. Agency File Plan that accurately reflects current agency business functions and organization
 3. Information Asset Plans that accurately identify the information assets and file series for which organizations are responsible
- C. **Monitoring Plans**
 1. Cyclic review of the Large Aggregate Flexible Schedule
 2. Regular (at least annual) review, update, and publication of the Agency File Plan
 3. Tri-annual submission by each organization of an Information Asset Plan
 4. Review and approval of Information Asset Plan changes occurring as a result of agency re-organizations
 5. Regular audits of Information Asset Plan against organization’s recordkeeping activities

10. Authorities & References

- A. 44 USC 3303: Federal Records Act – Disposal of Records
- B. 36 CFR 1225: Scheduling Records
- C. 36 CFR 1226: Implementing Disposition
- D. NARA FAQs about Records Scheduling and Disposition (June 06, 2005):
<http://www.archives.gov/records-mgmt/faqs/scheduling.html>
- E. NARA FAQs about Flexible Scheduling (May 03, 2010):
<http://www.archives.gov/records-mgmt/faqs/flexible-scheduling.html>

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F. BPA Policy 236-1: BPA IGLM program authorization

11. Review

The IGLM team within Information Governance is the responsible organization for this policy. This policy is reviewed on a three-year cycle beginning in 2015. All IGLM Manual policies are reviewed when revisions are introduced to BPA Policy 236-1, Information Governance and Lifecycle Management or other policies governing information management. Editorial updates to the policy and attachments may be made without IGOT and Policy Working Group review and approval.

12. Revision History

Version Number	Issue Date	Brief Description of Change or Review
2012-1	2012-11-05	Published completed original chapter, cmfrost.
2013-1	2013-09-03	Updated formatting, sect. 07, cmfrost.
2015-1	2015-07-08	Migration to new BPA policy format.
2016-1	2017-22-03	Revision to update IGLM Program Organization change from Agency Compliance & Governance to Information Governance, update to the file code structure, and migration to the new BPA policy format, cmfrost. This was a minor revision subject to policy working group and Labor Relations review. [T. Ono]

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