

BPA Policy 236-16

Essential Records Program

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1. Purpose & Background

- A. BPA’s Essential Records Program supports the identification and preservation of essential records that provide for the continuation of operations in the event of an emergency or disaster. The Federal Continuity Directive (FCD) 1, 2012, requires an essential records program at each Federal organization that must:
1. Provide the information needed to conduct business under other-than-normal operating conditions and;
 2. Identify and protect the most important records concerning the legal and financial rights of BPA and individuals directly affected by BPA’s actions.
- B. In 2016, the National Archives and Records Administration (NARA) began the process of changing the term “vital records” to “essential records” to mirror the term the Federal Emergency Management Agency (FEMA) uses in its FCD-1, 2012. Note: the term “vital records” is still used in Federal records management regulations.

2. Policy Owner

The Executive Vice President of Compliance, Audit, & 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, & Risk Management.

3. Applicability

This policy provides guidance and requirements for BPA’s Essential Records Program.

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 maintained records, series descriptions, and disposition authorities. The Agency File Plan maps to the Large Aggregate Flexible Schedule approved by NARA for BPA.
 2. **Continuity of Operations:** An effort to ensure BPA can continue to perform its Mission Essential Function (MEF) during a disruption of normal operations.
 3. **Continuity Event:** Any event that makes it impossible for employees to work in their regular facility and results in the activation of the Business Continuity Plan.
 4. **Business Continuity Plan:** A workgroup specific plan within BPA’s overall agency-wide Continuity of Operations Plan (COOP) that details how an individual organization ensures it can continue to perform its essential processes during a wide range of events that impact normal operations.

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5. **Emergency Operating Records:** Those types of essential records pertaining to the continued functioning or reconstitution of an organization during and after an emergency. They include emergency plans and directives, orders of succession, delegations of authority, staffing assignments, and selected program records needed to continue the most critical agency operations, as well as related policy or procedural records that assist staff in conducting operations under emergency conditions and for resuming normal operations after an emergency.
 6. **Essential Records:** Information systems and applications, electronic and hardcopy documents, references, and records needed to support essential functions during a Continuity Event. The two basic categories of essential records are Emergency Operating Records and Legal and Financial Rights Records (see, 36 CFR § 1223.2).
 7. **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 IAP also contains additional information about the medium, location, and other aspects of each organization's information assets.
 8. **Legal and Financial Rights Records:** A category of essential records that are critical 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.
- B. As used in this policy, the following acronyms apply:
1. **FEMA:** Federal Emergency Management Agency;
 2. **IGLM:** Information Governance and Lifecycle Management; and
 3. **NARA:** National Archives and Records Administration.

5. Policy

- A. BPA takes appropriate measures to ensure it identifies, protects, and provides access to essential records in support of continuity planning and emergency preparedness.
- B. **Identification**
 1. BPA identifies the records, record series, and electronic information systems that qualify as Emergency Operating Records or Legal and Financial Rights Records.
 2. Essential Records are identified and inventoried by each organization and documented both on its IAP and Business Continuity Plan.
 3. Only the most recent and complete sources of the information are Essential Records.
 4. IGLM maintains, reviews, and approves IAPs to ensure that Essential Records are appropriately identified.

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C. Protection

1. Essential Records can be maintained in any variety of media including physical media (paper and machine-readable media) and electronic formats. In selecting a media, ensure that the hardware, software and documentation needed to access records will be available following an emergency.
2. Organizations must include methods of protection for the Essential Records in their IAP:
 - a) **Duplication:** Duplication may be chosen as the primary protection method for essential records. Duplication can be in the same medium as the original record or to a different medium;
 - b) **Originals:** Original essential records may be stored off-site for protection if duplicates are available for business purposes.
 - c) **Dispersal:** Essential records must be dispersed to sites a sufficient distance away to avoid them being subject to the same emergency.

D. Access

1. Storage locations and means of access or retrieval must be documented in the organization’s IAP and Business Continuity Plan.
2. Essential Records may be stored at other office locations, off-site storage locations, or storage facilities maintained by a third party. When deciding where to store Essential Records, consider how quickly the records will be needed after an emergency. When feasible, an organization should store copies of Emergency Operating Records in a properly equipped and controlled emergency operations center.
3. Because Legal and Financial Records may not be needed as quickly as Emergency Operating Records, they may be stored in a different location.

E. Destruction

1. The destruction schedule of Essential Records is as follows:
 - a) Duplicate copies of Essential Records are destroyed when they are superseded or obsolete.
 - b) The NARA-approved records schedule governs the disposition of essential records that are original records (see BPA’s Agency File Plan).

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6. Policy Exceptions

Exceptions to this policy may be necessary based on legitimate business needs, legal requirements, or compliance requirements. Any exceptions must be documented, reviewed, and approved by the Office of Record, the IGLM team, and IT and then documented in the organization's IAP.

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. The ARO, through the IAP program reviews and approves essential records plans.

B. Information Governance

1. The IGLM team within Information Governance coordinates the overall IGLM program, which includes the Essential Records Program. The IGLM team:
 - a) Provides guidance and assistance to all BPA organizations on lifecycle management, and works with organizations to create and update their IAPs, including the identification of Essential Records; and
 - b) Partners with Information Security to perform Essential Records inspections to validate appropriate management.

C. **Information Technology:** Maintains backups to ensure that all electronic information can be restored, including original records that are Essential Records and systems.

D. Managers/Supervisors

1. Manage information assets within their areas of responsibility in a consistent manner to ensure the integrity, security, and availability of information assets;
2. Coordinate Essential Records protection and access with the Continuity of Operations Office and Information Technology organizations; and
3. Ensure Essential Records are identified and appropriately documented in the Information Asset Plan and Business Continuity Plan.

E. Continuity of Operations Office

1. Plans and directs continuity operations capabilities; develops standards and guidelines to support continuity operations capabilities; and
2. Works with organizations to create and update their Business Continuity Plans.

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8. Standards & Procedures

A. Information Asset Plan (IAP)

1. All organizations are required to file an IAP with the IGLM team at least triannually. These plans must be approved by the Agency Records Officer, though approval may be delegated by the Agency Records Officer to a member of the Information Governance organization. The IAPs 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. In addition, the following information about Essential Records must be included in IAPs:
 - a) The necessary business process for the continuity of operations and the creation or management of Essential Records;
 - b) The type of Essential Record; either Emergency Operations or Legal and Financial Rights; and
 - c) The protection method being used to safeguard the information in the Essential Records – either duplication with the duplicate or original in another location, or dispersal.
 - d) The location of the storage site.

B. Business Continuity Plan

1. The following information must be included in Business Continuity Plans:
 - a) The necessary business process for the continuity of operations and that creates or manages the essential records.
 - b) The type of essential Record; either Emergency Operating or Legal and Financial Rights;
 - c) The Essential Records strategy including storage location; and
 - d) The recovery time objective to gauge the time required to have continuity operations in process.
2. Other requirements for Essential Records management for Business Continuity Plans are found in FCD-1, 2017, Annex, and BPAM 133, Continuity of Operations.

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.

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B. Performance Standards

- 1. IAP information for Essential Records is current within three years.
- 2. Eighty percent or more of Essential Records inspected annually are managed according to the IAP.

C. Monitoring Plans

- 1. Each organization submits an IAP on at least a triannual basis.
- 2. The IGLM team reviews and approves changes to IAPs that occur as a result of agency re-organizations.
- 3. The IGLM team conducts regular compliance reviews with Information Security, checking for consistency between an organization’s IAP and its Essential Records management and maintenance activities.

10. Authorities & References

- A. 36 CFR § 1223, Managing Essential Records
- B. 44 USC §§ 2904 and 3101, Federal Records Act
- C. Federal Continuity Directive (FCD) 1, 2012
- D. BPAM 133, Continuity of Operations

11. Review

The IGLM team within Information Governance is the responsible organization for managing this policy’s review. This policy is reviewed on a three-year cycle beginning in 2017. All IGLM policies are reviewed when revisions are introduced to BPA Policy 236-1, Information Governance and Lifecycle Management, or other policies governing information management.

12. Revision History

Version Number	Issue Date	Brief Description of Change or Review
1.0	9/7/2018	First version in BPA Policy format. Supersedes BPAM 1132, Vital Records Protection Program.

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