BPA Policy 236-1

Information Governance & Lifecycle Management

Information Governance

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236-1.1 Purpose & Background

A) This policy authorizes BPA's Information Governance and Lifecycle Management (IGLM) program, which implements BPA's compliance with Federal requirements for information and records management including the Federal Records Act (Pub. L. 81-574), National Archives and Records Administration (NARA) regulations (36 CFR Chapter XII, Subchapter B), and the Federal Rules of Civil Procedure governing Discovery (FRCP Rule 26 et seq.).

B) The purpose of the IGLM program is to:

1) protect the legal and financial rights of BPA;
2) appropriately identify, organize, and maintain information as evidence of the agency's organization/functions, decisions, business transactions, policies, and procedures; and
3) dispose of information that no longer has continuing business value in a legally defensible manner.

236-1.2 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.

236-1.3 Applicability

This policy sets requirements for the creation, maintenance, and disposition of BPA business-related information.

236-1.4 Terms, Definitions & Acronyms

A) As used in this policy, the following terms and definitions apply:

1) **Federal Record**: All recorded information, regardless of form or characteristics, made or received by a Federal agency 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 data in them. Materials made or acquired solely for reference, extra copies of documents preserved only for convenience of reference and stocks of publications are not included. - see Federal Records Act, 44 USC §3301.
2) **Information Governance & Lifecycle Management (IGLM)**: A concept that describes the policies, strategies, processes, practices, services, and tools

used by an organization to manage its information assets through every phase of their existence, from creation or receipt, through their useful life to final destruction or disposition to an institution approved for archival deposit of Public Records by the National Archives.

3) **Recorded Information**: Documents, information, and data — including writing, drawing, graphs, charts, photographs, sound recordings, images, and other data or data compilations — stored in any medium from which content can be obtained directly or, if necessary, after conversion into another usable form.
4) **Office of Record**: The organization, by definition of its mission or function, that has primary responsibility for maintenance and retention of the record.

B) As used in this policy, the following acronyms apply:

1) **ACGC**: Agency Compliance and Governance Committee
2) **EIS**: Electronic Information System
3) **FOIA**: Freedom of Information Act
4) **IGLM**: Information Governance & Lifecycle Management
5) **IGOT**: Information Governance Oversight Team
6) **NARA**: National Archives and Records Administration
7) **OPSEC**: Operations Security
8) **SEIS**: Structured Electronic Information System

236-1.5 Policy

A) This policy establishes the principles of information governance and management of the information lifecycle, as well as how those principles are applied to all information assets belonging to BPA that arise from business processes.

B) BPA's IGLM policies cover all BPA business-related recorded information existing or newly created in all formats or media regardless of physical form or characteristics (media-neutral). This includes but is not limited to: paper, negatives, photographs, drawings, and microfilms (physical recorded information), as well as electronically stored information (ESI) including audio/video recordings, data, and recorded information held on servers, computers, portable computers, memory sticks, personal digital assistants, and mobile phones.

C) **Information Assets:** BPA considers information a vital business asset, and the principles and concepts associated with IGLM are integral to all business processes that create, access, or receive information. Therefore, BPA appropriately manages its information assets through its IGLM Program to ensure the protection and quality of its information assets, as well as to meet its regulatory and legal obligations, which include:

1) **Government Property:** Information received, created or compiled by the officials and employees of the Federal Government for the use of the Government is record material and is, therefore, the property of the United States. Federal officials and employees, by virtue of their positions, have no personal or property right to records even though they may have helped develop or compile them. The unlawful destruction, removal or personal use of records is criminal misconduct (18 USC § 2071).

    a) Mandatory training is provided to all employees and contractors on their responsibilities for managing information assets as government property.

    b) The exit process for departing employees includes a requirement to transfer custody of Federal records to another employee or manager to prevent inadvertent loss, destruction, or removal of Federal records. This requirement includes an exit interview for senior executives and chief officers of BPA.

2) **Legal Hold and Production:** BPA may be legally required in litigation, a WECC or other regulatory audit, Freedom of Information Act (FOIA) or Privacy Act request to provide the information it maintains to other parties.

D) **IGLM Program:** BPA operates an effective and efficient IGLM program to ensure that the right information is available in the right format, when needed, and at the right cost. IGLM incorporates the framework and the principles outlined in this policy to conduct the program.

E) **Information Asset Framework:** BPA's information assets are organized according to retention (the Large Aggregate Flexible Schedule) and location (identified by the Information Assets Inventory).

1) **Large Aggregate Flexible Schedule:** In accordance with 44 USC § 3303, the head of each agency is required to submit a schedule identifying retention periods for the Federal records in the custody of the agency to NARA for approval. BPA has fulfilled this obligation by submitting its Large Aggregate Flexible Schedule (also known as the "Big Bucket" schedule). The Big Bucket schedule consists of 24 business function categories and a total of 97 retention schedules covering all Federal records created, received or identified by the agency. IGLM maintains the Agency File Plan that cross-walks to the Big Bucket schedule. Each Office of Record maintains Information Asset Plans according to the Agency File Plan.

2) **Information Assets Inventory:** The Inventory of BPA Information Assets is inclusive of third-party hosted and internal physical storage and electronic systems, Web 2.0 and social media systems, enterprise resource planning and database systems, messaging and file systems. Regardless of the system where the information asset is stored, it or

an appropriate extracted rendition must adhere to the assigned retention requirements from the Agency File Plan.

236-1.6 Policy Exceptions

None

236.1.7 Responsibilities

A) **Administrator:** Under the Federal Records Act, the Administrator has ultimate responsibility for compliance with this policy. The Administrator assigns functional responsibility to the Audit and Internal Controls Committee for ensuring BPA's IGLM policy and program are in compliance with regulatory obligations.

B) **Information Governance Oversight Team (IGOT):** Chartered by the Audit, Compliance, and Governance Committee, the IGOT is responsible for ensuring that IGLM policies, principles, and standards are implemented and understood within the agency. The IGOT will provide a policy development and review process for proposed new/revised policies within the BPA internal policy 236 series as well as acting as a sponsoring body for specific information governance projects.

C) **Agency Compliance and Governance Committee (ACGC):** The overarching committee with responsibility for monitoring the IGLM program and policy. It is supported by the IGOT. The ACGC recognizes that it has a specific corporate responsibility for IGLM. All relevant policies will demonstrate IGLM principals and adherence to standards promulgated by regulatory bodies.

D) **Internal Controls Oversight Team (ICOT):** Is responsible for compliance, monitoring, and performance indicator reporting to the AGCG on IGLM program compliance.

E) **Chief Compliance Officer:** Takes ownership of any risks associated with the management of BPA's information assets and IGLM policy and serves as advocate for managing information risk on the ACGC. The Chief Compliance Officer is responsible for developing and encouraging good information handling practice amongst all members of BPA. This individual will work with other AICC members and managers whose responsibilities include information management. The Chief Compliance Officer is a chief sponsor of the IGOT.

F) **Chief Information Officer:** Establishes and fosters ongoing collaboration between the IGLM Office and information technology communities to effectively manage electronic records, promote coordination in the use of information asset management applications across the agency, and ensures IT systems' compliance with IGLM program policies. The Chief Information Officer is a chief sponsor of the IGOT.

G) **Assistant General Counsel for General Law:** Has responsibility for issuing legal hold memoranda when necessary to support actual or anticipated litigation or other legal matters and determining when such holds are lifted. The Office of General Counsel (OGC) organizes, manages, and oversees the collection, preservation, review, and production of recorded information for discovery. Legal holds and searches for the purpose of discovery or other legal matters are coordinated with IGLM, Cyber Security, IT, and affected program offices. OGC also provides assistance and guidance for the IGLM program regarding regulations governing management of records and information including retention schedules. The General Counsel is a chief sponsor of the IGOT.

H) **Governance and Internal Controls Manager:** Chairs the IGOT and is the representative for the Chief Compliance Officer on the board. This position is responsible for reporting to the AICC on BPA's IGLM program and policy as well as allocating resources to the IGLM program.

I) **Agency Records Officer, FOIA/Privacy Officer:** Chairs the IGOT and is responsible for the overall development and maintenance of the IGLM Program for BPA according to the principles in this policy. This includes drawing up practice guidance, promoting policy compliance, and bringing forward policies to the IGOT and the Vice President of Audit, Compliance, and Risk for review and approval. This position is responsible for reporting to the ACGC on BPA's Information Governance programs and policies as well as allocating resources to the IGLM program. The position also acts as a liaison with the Department of Energy and NARA.

J) **Security and Continuity of Operations:** Is responsible for information security (INFOSEC) including BPA's Official Use Only program, which identifies certain unclassified controlled information as Official Use Only and marks and protects documents containing such information. In addition, Operations Security (OPSEC) identifies Critical Program Information, which requires additional security measures necessary to protect that information. Both of these programs collaborate with the IT organization and IGLM on security issues for the agency's information assets.

K) **Executives, Managers, and Supervisors:** Are responsible for applying IGLM policy to recorded information within areas of their responsibility. BPA managers and supervisors are expected to lead by example by promoting a culture that properly values, protects, and uses data. The responsibility for information lifecycle management is assigned to managers and supervisors. Heads of department have overall responsibility for recorded information generated by their activities and specifically for:

1) ensuring recorded information is managed in accordance with the IGLM policy and other information governance policies within their designated areas;

2) ensuring that their staff receive training, are aware of the requirements of appropriate information governance policies, and apply the correct procedures and controls relevant to their work; and

3) on at least a three-year cycle, submitting information assets plans to IGLM for the Federal records and other information assets within their custody. An organization having custody of a series of Federal records is the office of record for that series.

L) **BPA Employees:** All employees have a personal responsibility for adhering to policy, principles, and procedures to help maintain the availability, effectiveness, security, and confidentiality of recorded information. Further, employees have responsibility for recorded information that they create, receive or that they have some impact upon. Employees should consider the following when creating/receiving recorded information: what they are recording and how it should be recorded; why they are recording it; how to validate information to ensure they are recording the correct data; how to identify and correct errors and how to report errors if they find them; how the recorded information is used; and how to update recorded information and add information from other sources.

M) **Contractors and Service Contracts:** Service Level Agreements and contracts with outside vendors must include the responsibilities for the management of records and information and address all relevant aspects of information governance.

236-1.8 Standards & Procedures

A) BPA's IGLM program and policies are implemented using the principles of:

1) information asset business objectives;

2) information lifecycle management;

3) information governance principles; and

4) integration of IGLM into IT requirements.

B) **Information Asset Business Objectives.** For recorded information to be an asset, it must be usable. To be usable, the recorded information must have certain attributes. It must be able to be located, retrieved, presented, and interpreted. It should be possible to demonstrate a direct connection to the business activity or transaction that produced it as well as the context of BPA's business functions. To accomplish this, the IGLM program and policies are designed to ensure that all information assets will demonstrate the following throughout the lifecycle:

1) Integrity. Recorded information has a reasonable guarantee of being complete, unaltered, authentic, and reliable. Authentic means recorded information can be shown to be what it purports to be, has been created or sent by the person purported to have created it or sent it, and has been created or sent at the time purported. Reliable means the content of the recorded information can be trusted as a full and accurate

representation of the transactions, activities or facts to which it attests and it can be depended upon in the course of subsequent activities and transactions.

2) Security. There is a reasonable level of protection (a secure environment) for recorded information ensuring that it is private, confidential, privileged or essential for business continuity. The recorded information must be secure from unauthorized or inadvertent alternation or erasure. Access and disclosure must be properly controlled and auditable in tracking use and changes.

3) Availability. Recorded information is accessible, organized and maintained in a consistent manner ensuring timely, efficient, and accurate retrieval by personnel with a legitimate business need. Accessible means that recorded information can be located and displayed in a way consistent with the original format used.

C) **Information Lifecycle Management.** BPA manages all of its recorded information in accordance with the concept of information lifecycle management as described in the following three phrases:

1) Identification. Identification is the beginning of the lifecycle including both the creation and/or receipt of recorded information in any medium and determination of continuing business value, usage, ownership, security, retention, and metadata (structured information about any recorded information such as date and time the recorded information was created, the author, organization, or other data).

2) Maintenance. Maintenance addresses how and where recorded information is retained. Retention means keeping recorded information for the appropriate amount of time, taking into account legal, regulatory, financial, operational, and historical requirements. Maintenance also includes ensuring appropriate access, searchability, sharing, and use of recorded information in support of business functions.

3) Disposition. Disposition is the end of the lifecycle and covers action taken regarding recorded information that is no longer needed to conduct regular, current business. Disposition includes the physical destruction/deletion of recorded information, transfer of records to Federal agency storage facilities or records centers, and transfer (including legal ownership) to NARA of records determined by NARA to have sufficient historical or other value to warrant continued preservation.

D) **Information Governance Principles.** The IGLM program is aligned with governance, risk, and compliance (GRC) principles established by the Compliance and Governance organization including:

1) Oversight and program management. The agency IGLM program includes appropriate authority to oversee the program.

2) Risk assessment and management. Organizations must treat information risk as a business issue. The agency IGLM program will incorporate regular risk assessments;

information risks will be recorded in risk registries, risk tolerances set, impacts assessed and treated plans developed and implemented.

3) Policy and guidance. The agency IGLM program is responsible for developing, documenting, and promulgating policies and procedures to guide personnel on managing information and complying with applicable laws and regulations governing information. The policies, processes, and procedures of the agency IGLM program are made available to all personnel and appropriate interested parties.

4) Comunication and training. Mandatory training is necessary to ensure that all personnel are aware of and compliant with their information management obligations. To facilitate employees' ability to appropriately manage the agency's information assets the agency IGLM program is responsible for developing and deliverying:

    a) training on IGLM policies and procedures; and

    b) regular communications on IGLM.

5) Compliance. The agency IGLM program is constructed to comply with applicable laws and authorities as well as ensuring the program can be audited. This includes establishment of audit and evaluation processes for compliance, effectiveness, and efficiency of information management at the organizational level.

E) **Intergration of IGLM Requirements into IT Systems.** The integration of IGLM requirements into the information architecture of future IT systems is essential. Information architecture is defined within this chapter as,"…the structural design of shared information environments, including both manual and electronically generated information." It involves analyzing, designing and coordinating the various elements that make up an information system including: hardware, software, data, networks, business processes, staff and resources.

1) BPA acknowledges that managing information held electronically is not just a technology issue; it is also a policy issue, a business issue, and a training issue. Reliable information, not technology, is essential to accountability. As BPA has an increasing dependency upon digital information, it is essential that future policy considers potential future problems relating to inadequate information technologies and unsuitable electronic information lifecycle management practices.

2) IGLM requirements and information architecture on BPA hosted systems are managed through Infrastructure Storage and Network Services by IT specialists who know how to achieve and advise on IGLM requirements and appropriate strategies, standards, practices, and technologies suitable for the entire organization.

3) In summary, this approach ensures that all BPA IT systems that generate and manage recorded information serve as:

a) a source of trusted recorded information that can be used to support business functions and decision-making; and

b) instruments of accountability.

236-1.9 Performance & Monitoring

Reserved

236-1.10 Authorities & References

A) Federal Records Act (Pub. L. 81-574, 44 USC §§ 2904, 3101 et seq.)

B) Criminal provisions for willful and unlawful destruction, damage or removal of Federal records (18 USC § 2071)

C) Title 36, Code of Federal Regulations (CFR), Chapter XII, Subpart B

D) The Privacy Act of 1974 (Pub. L. 93-579, 5 U.S.C. § 552a et seq.)

E) Federal Rules of Civil Procedure (FRCP) Rule 26, Rule 34

F) Records Management Program (DOE Order o243.1B)

G) BPA Internal Policy 236-4, Freedom of Information Act (FOIA)

H) BPAM Chapter 1078, Security of Classified Matter

I) BPAM Chapter 1101, Information Technology Policies

J) BPAM Chapter 1110, Business Use of BPA Information Technology Services

K) BPAM Chapter 1140, Use of Social Media/Web 2.0 Tools

L) BPAM Chapter 1132, BPA Vital Records Protection Program

236-1.11 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 2015. 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. Editorial updates to the policy and attachments may be made without IGOT and Policy Working Group review and approval.

236-1.12 Revision History

Version	Issue Date	Description of Change
2012-1	2012-02-13	BPAM 1150 published and supersedes BPAM 1122
2015-1	2015-06-02	Migration of content to new BPA policy format. BPA Policy 236-1 published and supersedes BPAM 1150.
2016-1	2016-05-06	Revision to update IGLM Program Organization change from Agency

		Compliance & Governance to Information Governance. Format Updated to new standard, dvkilyukh. Policy ownership moved to EVP CAR. Administrative change. Effective date not updated.