



DEPARTMENT OF THE NAVY
CHIEF INFORMATION OFFICER
1000 NAVY PENTAGON
WASHINGTON DC 20350-1000

21 March 2013

MEMORANDUM FOR DISTRIBUTION

Subj: DEPARTMENT OF THE NAVY POLICY FOR ELECTRONIC RECORD KEEPING SYSTEMS AND APPLICATIONS

Ref: (a) SECNAVINST 5210.8D, Department of the Navy Records Management Program, of 31 Dec 05
(b) Title 36 Code of Federal Regulations
(c) DoD 5015.2-STD, Electronic Records Management Software Applications Design Criteria Standard, of 25 Apr 07
(d) Title 44 United States Code
(e) SECNAV Manual M-5210.1, Department of the Navy, Navy Records Management Program, Records Management Manual, of Nov 07

Encl: (1) Definitions
(2) Records Management Functional Requirements for Electronic Information Systems (EISs)
(3) Electronic Information Systems (EISs) records Management Compliance Waivers and Resource Considerations
(4) Roles and Responsibilities

1. Purpose: The purpose of this memorandum is to delineate records management (RM) policy for electronic information systems (EISs) and records management applications (RMAs) within the Department of the Navy (DON). This policy pertains to new, updated, and existing DON EISs and RMAs. Enclosures (1) through (4) provide detailed information essential to policy compliance.

In addition to complying with Department of Defense (DoD) and DON policies and Federal statutes and regulations, effective EIS RM facilitates information discovery and visibility, which improves information sharing. Additionally, effective EIS RM facilitates removal of obsolete data, improves security, and helps maintain current, authoritative information sources.

2. Policy: It is the policy of the Department of the Navy to:

a. Identify and manage all records, regardless of physical form or characteristics, and ensure all Federal records are covered by schedules approved by the National Archive and Records Administration (NARA) (reference (a)). These requirements apply to all records, including records associated with an EIS (reference (b) §1236.10).

b. Acquire and use only RMAs that are certified in accordance with reference (c) (per reference (a)).

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c. Ensure all records associated with an EIS are covered by NARA-approved disposition schedules (reference (b) §1236.26). In many cases, this is simply a matter of applying existing DON disposition schedules (reference (e)) or a NARA General Records Schedule.

d. Properly manage EIS records.

(1) To meet this requirement, the seven RM functional requirements delineated in enclosure (2) must be incorporated into the design, development, enhancement, and implementation of each EIS (reference (b) §1236.6(b)). Alternatively, the records may be exported to a certified RMA external to the EIS (reference (b) §1236.20(b)).

(2) Most EISs contain records with just a small number of Standard Subject Identification Codes (SSICs), retention periods, and dispositions. If an EIS contains records with many different SSICs, similar to an RMA, it must be certified in accordance with reference (c) or the records may be exported to a certified RMA external to the EIS (reference (b) §1236.20(b)).

(3) Upon retirement of an EIS, records with incomplete retention periods must be exported into a certified RMA or, if applicable, migrated to the EIS that is assuming the outgoing system's functions.

e. Document and manage the RM scheduling and functional compliance status for each information system and EIS in DoD IT Portfolio Repository-Department of the Navy (DITPR-DON). Document RMAs in the DON Application Database Management System (DADMS). Procedures for determining compliance with EIS RM requirements and for documenting compliance status in DITPR-DON are contained in a user's guide available on the DON CIO web site (www.doncio.navy.mil).

3. The DON CIO point of contact for records management is Mr. Dean Wence, (703) 695-1971, DSN 332-1802, dean.e.wence@navy.mil. The DON CIO RM DITPR-DON SME is Ms. Suzette Buttram, (703) 695-1970, DSN 225-1970, suzette.buttram@navy.mil. The USN Records Manager is Mr. Matt Staden, (202) 433-4217, SECNAV_OPNAVrecords@navy.mil. The USMC Records Manager is Ms. Kim Enright-LaMere, (703) 614-1081, kim.enrightlamere@usmc.mil.


Terry A. Halvorsen
Department of the Navy
Chief Information Officer

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DEFINITIONS

1. **Disposition** are those actions taken regarding records no longer needed for the conduct of the regular current business of the agency (reference (b) §1220.18).
2. **Electronic Information Systems** are information systems (IS) that contain and provide access to computerized Federal records and other information (reference (b) §1236.2). The Defense Travel System and DITPR-DON are examples of EISs.
3. **Federal Records** are documentary materials that are evidence of a Federal Agency's organization, functions, policies, decisions, procedures, operations, or other activities (reference (d) §3301).
4. **Information System** is the organized collection, processing, transmission, and dissemination of information in accordance with defined procedures, whether automated or manual (reference (b) §1220.18).
5. **Records Management Applications (RMAs)** are software used by an organization to manage records. RMA software categorizes, locates, stores, and retrieves records and identifies records that are due for disposition (reference (d)). For example, TRIM (Total Records and Information Management) is a compliant RMA available to many Navy and Secretariat commands via NMCI. TRIM is also approved by the Enterprise Services Functional Area Manager (reference (c)).
6. **Retention Period** is the length of time that records must be kept (reference (b) §1220.18).
7. **Scheduled Records** are records with a NARA approved disposition and retention period.

RECORDS MANAGEMENT FUNCTIONAL REQUIREMENTS FOR ELECTRONIC INFORMATION SYSTEMS (EISs)

The minimum recordkeeping functional requirements for EISs (reference (b) §1236.20) are provided below:

1. **Declare records:** Provide unique identifiers to records.
2. **Capture records:** Collect and properly retain records that were created, imported and/or manually entered into the system or link records to other systems.
3. **Organize records:** Associate records with approved records schedules and disposition instructions.
4. **Maintain records security:**
 - Prevent unauthorized access, modification, or deletion of records.
 - Ensure that an audit function is in place to track use of and actions on records (e.g., modification, deletion).
5. **Manage access and retrieval.** Establish appropriate user access rights for record search and retrieval.
6. **Preserve records:** Ensure that all records in the system are retrievable and usable for as long as needed to conduct agency business and meet NARA-approved dispositions. In order to avoid records lost due to media decay or technology obsolescence (including EIS upgrades), the PM must develop procedures to migrate records and associated metadata to new storage media or formats. Alternatively, the PM might consider transferring permanent records to NARA early.
7. **Execute disposition:** Identify and transfer permanent records to NARA according to approved records schedules. Identify and delete or transfer temporary records according to approved records schedules. When notified by appropriate authority, identify applicable records and apply a record hold or freeze.

These requirements do not need to be met with automated features such as automated notifications and preset responses. In many cases, systems meet the requirements using existing features and/or manual processes. For example, if a DON EIS maintains a single type of record that is covered by a NARA-approved disposition schedule, all information in that system is captured and declared as records according to that associated records schedule. Periodically, the individual records within the EIS can be manually sorted by date and those older than the required retention period can be deleted from the system.

This is not an isolated case. Many of the DON's EISs comply with these requirements. Often, when program office personnel consider the functional requirements, they realize that their system already has the means to meet them.

System and file backup processes and media normally do not provide the appropriate recordkeeping functional requirements and must not be used for electronic recordkeeping unless they satisfy these criteria.

RESOURCE CONSIDERATIONS AND ELECTRONIC INFORMATION SYSTEM (EIS) COMPLIANCE WAIVERS

Consideration must be given to where a system is in its lifecycle when determining the appropriate resources to expend in complying with this policy. EISs that do not yet comply with the RM functional requirements or whose records are not exported to a certified RMA must submit a waiver request to fulfill DON Enterprise Architecture (EA) compliance. The waiver process specific to each stage of the system lifecycle is described below.

- **The system is in sustainment or retiring in the near future.** In this case, waiving the EIS RM requirements may be appropriate. PMs should contact the DON CIO RM DITPR-DON subject matter expert to determine waiver applicability.
- **The system will be migrating into another system.** In this case, the waiver request should identify the system into which the existing system is migrating and state whether the new system meets the RM functional requirements.
- **The system is in post-deployment and doesn't yet meet the RM functional requirements.** In this case, the waiver request must outline the plan to obtain compliance or state that such a plan will be developed.
- **The system is in pre-deployment and doesn't yet meet the RM functional requirements.** Given their long life expectancy and this early opportunity to influence system design, these systems are the prime focus of this policy. In this case, the waiver request must outline the plan to obtain compliance.

Waiver requests are submitted through DITPR-DON. The waiver is valid for up to one year. The waiver request includes a justification and reason for the waiver as well as a planned compliance date and compliance event (e.g., system upgrade, program milestone, etc.).

ROLES AND RESPONSIBILITIES

1. DON EIS and RMA Program Managers:

- Ensure their EISs and/or RMAs comply with the guidance contained in this memorandum.
- Document the RM-related requirements of their EISs in DITPR-DON and RMAs in DADMS. Enclosures (2) and (3) provide additional guidance.
- Collaborate with RM subject matter experts to assess the records related determinations cited in this memorandum and to ensure correct information is entered in DITPR-DON. Available RM experts include U. S. Navy (USN) and U. S. Marine Corps (USMC) Record Managers, command records managers/officers, and Echelon II/USMC Command Designated Records Managers.

2. The USN and USMC Records Managers may prescribe Service specific processes for DITPR-DON documentation. Currently, the USMC Records Manager is completing DITPR-DON "RM" tabs for USMC EISs, and USN Echelon II Record Officers are completing the "RM" tabs for systems within their chains of command.

3. As part of the annual EA reviews, the DON CIO RM Team will review each system registered in DITPR-DON to ascertain the system's compliance with the RM functional requirements outlined in enclosure (2).