

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.