

Directive: GLPR 1440.1G

Effective Date: 04/30/2024 Expiration Date: 04/30/2029

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Responsible Office: Code V/Office of the Chief Information Office

Subject: Records Management w/Change 1 (06/20/2024)

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Distribution: Business Management System (BMS) Library

Preface

P.1 Purpose

- a. The purpose of this Glenn Procedural Requirement (GLPR) is to establish a consistent method for identifying, collecting, indexing, accessing, filing, storing, maintaining, and dispositioning records.
- b. It is NASA policy to accurately and completely make and preserve records that contain documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the Agency. Documentary materials created by government employees, as well as those created by suppliers providing procured material, and contractor employees in the process of performing work for NASA (under the terms of their respective contracts) are considered official Agency/Government records.
- c. The NASA Records Retention Schedules (NRRS) 1441.1 specifies how long to keep records and the method of disposition once the retention period is reached. Each organization has completed an Organizational Records Inventory (ORI) which identifies record locations and retention times per NRRS 1441.1.

P.2 Applicability

- a. This procedure is applicable to all records created or received by Glenn Research Center (GRC) Lewis Field and Armstrong Test Facility (ATF). It demonstrates and documents conformance to specified requirements and verifies that the Center is in compliance with federal codes dealing with the retention of records.
- b. This directive is applicable to documents developed or revised after the effective date of this GLPR.
- c. In this directive, all mandatory actions (i.e., requirements) are denoted by statements containing the term "shall." The term "may" denotes a discretionary privilege or permission, "can" denotes statements of possibility or capability, "should" denotes a good practice and is recommended, but not required, "will" denotes expected outcome, and "are/is" denotes descriptive material.
- d. In this directive, all document citations are assumed to be the latest version, unless otherwise noted.

P.3 Authority

- a. Records Management, 36 Code of Federal Regulations (CFR), Chapter XII, Subchapter B.
- b. NASA Policy Directive (NPD) 1440.6, NASA Records Management
- c. NASA Procedural Requirements (NPR) 1441.1, NASA Records Management Program Requirements

P.4 Applicable Documents and Forms

a. NASA Records Retention Schedules (NRRS) 1441.1

- b. GLPR 1280.1, Glenn Research Center Quality Manual
- c. GRC 273, Destruction Authorization Template
- d. GRC 446, Appointment of Records Liaison Officer

P.5 Measurement/Verification

- a. Organizations will verify that their program/project requirements for records are established, reviewed, and monitored by completing an Organizational Records Inventory in the Agency ORI tool, for compliance to this GLPR and NPR 1441.1. The ORI completed by organizations serves as the baseline document for Records Management staff to assess the effectiveness of organizational record keeping.
- b. Verification of GRC compliance to this GLPR and NPD 1440.6 is accomplished through the GRC internal audits program per GLPR 1280.1 and include regular audits of randomly selected organizations conducted by the Records Manager. Results of these audits will be documented and reported to Center management and the Agency Records Officer.

P.6 Cancellation

This directive cancels GLPR 1440.1F, Records Management w/Change 2, dated August 1, 2019.

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Laurence A. Sivic Associate Director

CHAPTER 1. Responsibilities

1.1 Center Director

The GRC Director is responsible for implementation of effective records management programs at their Center and designation of a Center Records Manager (RM) and an Essential Records Manager. The GRC Director shall ensure that organizations generating statements of work for contracts include appropriate records management requirements to comply with this GLPR and its authorities in all NASA contracts involving creation or maintenance of federal records.

1.2 Chief Information Officer (CIO)

- 1.2.1 The Center CIO has functional responsibility to provide the appropriate personnel, equipment, and facilities for the handling, storage, retrieval, preservation, and disposal of government records.
- 1.2.2 The NASA Center CIOs are responsible and accountable, in coordination with their Center Records Manager, for electronic records management implementation in accordance with 36 CFR 1234 and are responsible for ensuring incorporation of records management and archival functions into the design, development, and implementation of information systems.

1.4 Records Manager (RM)

The RM shall:

- a. Oversee the Center's records management program (RMP); establish and maintain Center procedures and work instructions for the Center's RMP; collect, index, assess, file, store, maintain, and disposition all records including contractor-held records.
- b. Control damage, deterioration, and loss of all records it maintains.
- c. Coordinate activities and communicate the responsibilities of the Records Liaison Officers (RLO).
- d. Coordinate the request for new retention schedules between Center organizations and NASA Headquarters.
- e. Conduct annual records management reviews to examine file plans, filing systems, and record inventories (regardless of medium) through its annual review of the ORI, reduction(s) of onsite noncurrent records, and archiving activities; and to review official files, records in electronic systems, and systems outputs to determine if needed documentation is being created and maintained; Document and correct discrepancies and/or missing data; conduct an annual self-assessment of the RM at Glenn, as prescribed by the Agency Records Officer; conduct inspections for appropriate facility standards as specified by National Archives and Records Administration and the NASA Records Officer, to ensure that permanent and official records are selected, identified, and protected; submit annually any discrepancies that indicate that records are not being protected, preserved, and maintained in compliance with current regulations.

f. Document and report results of records reviews to Center management and the Agency Records Officer.

1.5 Essential Records Manager

The Essential Records Manager, in coordination with their RM and Emergency Preparedness Officers, shall facilitate the designation, maintenance, and protection of their Center's essential records as defined in 36 CFR 1236.14.

1.6 Center Organizations

Center organizations shall:

- a. Identify records and ensure these records are filed, accessible and retrievable for their period of required retention, and controlled to the requirements of this GLPR.
- b. Through statements of work, specifications, or other requirement descriptions, communicate to suppliers and contractors the program/project record requirements for procured material and/or the services that they provide to GRC.
- c. Submit an updated ORI to the RMP upon notification from the RMP or whenever changes are made to the organizations record holdings and ensure that the ORI captures records from all organizational levels including branch, division, and directorate records.
- d. Submit an updated GRC 446 to the RMP upon request from the RMP or whenever changes are made to the organization's RLO.
- e. Seek ways to eliminate the paper-based records they are producing, and instead create and maintain official records in electronic formats to the fullest extent possible.

1.7 Contracting Officer (CO)

The CO shall ensure that each contract includes:

- a. All applicable record requirement clauses based on the material and/or services to be provided by the contractor, and
- b. The statement of work, specification, or other requirement description provided by the requiring organization.

1.8 Records Liaison Officers (RLO)

1.8.1 The RLO is an appointed individual who is responsible for the overall implementation and maintenance of an organization's records program. The GRC 446 is sent to the Manager appointing the individual and stating that the RLO responsibilities are understood and will be performed. The signed GRC 446 is then sent to the RMP.

1.8.2 The RLO shall:

- a. Be knowledgeable of the types of technical and administrative records created and received by their organization. They are the focal point for all records management matters and are the prime liaison with the RMP. The RLO should assure that their organization is using proper filing techniques that allow for proper storage and retrieval of all records created or received.
- b. Maintain the ORI and its submission to the RM whenever requested or when the organization record holdings change.
- c. Assure that the record files, record lists, and records being transferred to electronic records storage through the RMP contain accurate and complete descriptions, and that the appropriate retention schedule has been applied.
- d. Identify records created or received, unscheduled records that are not currently in the NRRS 1441.1 and request a new schedule through the Records Management Program.
- e. Attend training sessions provided by the RMP and disseminate that information to the personnel in the organization.

1.9 Records Owners

Records owners shall:

- a. Ensure that appropriate records retention schedules are applied when disposing of their records and work with the RLO to provide record information for inclusion on the organizational ORI.
- b. Respond within 30 days to destruct authorizations for records in storage. Records owners are responsible for applying appropriate retention in a timely manner to physical and electronic records in their possession.
- c. Keep track of records they have placed in inactive records storage and ensure any records in storage or in their possession are transferred to an appropriate consignor when departing service. No records should be removed from the Center without first consulting with Records Management.
- d. Records owners are responsible for the safe storage of records. Electronic records will be protected from loss, corruption, and appropriately accessible for the retention period of the record. They will be stored in backed up and appropriately accessible environments and never on personal computer spaces. Records containing Personally Identifiable Information (PII) or that are Controlled Unclassified Information should be marked and stored according to the Agency information security policies and procedures. Any paper records should be kept in filing cabinets in environmentally stable areas. Records stored in boxes will be elevated off the floor.

1.10 Program and Project Managers

Program and project managers shall:

a. Ensure all records for their respective programs or projects are managed according to the appropriate Project Management governing requirements document (NPR, GLPR, GLP, etc.),

which includes a Mechanism for identification of records produced by the project. In cases where the program hierarchy does not prescribe a definitive mechanism for inventory of project records, the project manager or designee, shall contact the Records Management program for guidance.

- b. (Or their designee) be responsible for the safe storage of records. Electronic records will be protected from loss and corruption and must be appropriately accessible for the retention period of the record. Records containing PII or that are Controlled Unclassified Information should be stored in accordance with the Center information security guidelines. Any paper records should be kept in filing cabinets in environmentally stable and protected areas. Records stored in boxes will be elevated off the floor.
- c. Ensure their program or project has adequately planned for the retention, transfer, or disposition of the records after the program or project has been closed out.

CHAPTER 2. Procedure

2.1 Determination of Record Retention Requirements

- 2.1.1 The originator creates or receives records as a result of implementing procedures and work instructions.
- 2.1.2 The originator checks with their RLO to see if the record is listed on the Organizational Records Inventory (ORI).
- a. If yes, use the retention period identified on the ORI.
- b. If no, the originator notifies the RLO of the new record information for the determination of the record retention schedule.
- 2.1.4 The RLO adds a new record and records the retention schedule information to the ORI. If the record is unscheduled or the originator does not believe the schedule is adequate, the RLO requests a new schedule through Records Management. The RLO informs the originator of Records Management's decision.
- 2.1.5 Once the updates have been finalized on the ORI, Records Management will approve in the ORI database.
- 2.1.6 The originator files the records and maintains the files in their office until they are no longer needed for the current activity.

2.2 Electronic Records Storage

- 2.2.1 The originator determines whether files qualify as records for continued retention. (Refer to ORI or NRRS 1441.1.)
- a. If yes, go to 2.2.2
- b. If no, go to 2.2.4
- 2.2.2 The originator:
- a. Initiates a storage request on the Inactive Records Storage SharePoint.
- b. Provides required information about the records collection.
- c. Uploads records to provided file location.
- 2.2.3 Records Management reviews the records and confirms completeness and correctness of metadata.
- 2.2.4 The originator determines the records have met their retention and can be destroyed.

- a. Contacts Records Management to document the records series, retention schedule, and destruction.
- b. Deletes the records.

2.3 Disposal of Temporary Records in Storage

2.3.1 On a quarterly basis, the RMP will generate a report of records eligible for destruction.

2.3.2 The RMP will:

- a. Create "Destruct Authorizations" using GRC 273 for records consignors listing the boxes eligible for destruction and a due date by which the GRC 273 shall be returned to the RMP.
- b. Email the GRC 273 to the consignor with instructions and copy the RLO and applicable organization manager.
- c. Update the spreadsheet of GRC 273 status which includes the name of the consignor, organization, number of boxes included on the GRC 273, the due date, and when the GRC273 was returned.

2.3.3 The consignor will:

- a. Review the listing of boxes eligible for destruction and will either authorize boxes for destruction or request that the boxes be maintained for a longer period of time and provide adequate justification.
- b. Note the appropriate action to be taken on the GRC 273, sign the form, and forward to the RLO and division chief for signature.
- c. Send the completed form with all signatures to the RMP by the due date.

2.3.4 The RMP shall:

- a. Send a reminder within 3 working days if the GRC 273 is not received by the due date.
 - (1) This will include a warning that a corrective and preventive action report (CPAR) will be issued if the GRC 273 is not received within 15 working days of the reminder.
 - (2) Copy the RM.
 - (3) Update the status spreadsheet to document the reminder.
- b. Issue a CPAR against the consignor's organization if the GRC 273 is not returned within 15 working days of the GRC 273 reminder and document this on the status spreadsheet.
- c. Upon receiving completed GRC 273 forms, have the boxes pulled from storage and destroyed via shredding. The GRC 273 will be retained for 25 years, per the NASA Records Retention Schedule, and the destruction recorded in the Visual Corporate Keeper (VCK) database.

2.4 Organizational Records Inventory Maintenance

- 2.4.1 Each organization shall prepare and maintain an inventory of its records in the Agency Organizational Records Inventory (ORI) tool.
- 2.4.2 Records Management shall direct Records Liaison Officers to review and update their inventories annually. The date of review will be recorded in the ORI tool.
- 2.4.3 Additionally, organizations shall make updates to their inventory any time there is a change to the records listed. This may include but is not limited to: addition of new records, removal of records no longer held by the organization, changes in location, and changes in retention schedule.

Appendix A. Definitions

Armstrong Test Facility (ATF). A GRC campus in Sandusky, Ohio, which includes a NARA-approved storage facility used by GRC for records storage in lieu of sending records to a Federal Records Center (FRC).

Essential Records. (Previously known as vital records.) Records necessary for the continuity of operations and protection of rights and interests of the government in the event of a catastrophic event.

Federal Records Center (FRC). The National Archives and Records Administration (NARA) authorized facility for the storage of Agency records until final disposition is met at which time the records are either destroyed or transferred to NARA for permanent legal custody.

Inactive Records. Records no longer needed to conduct Agency business on a daily basis and therefore, ready for storage until final disposition.

NASA-Owned/Contractor-Held Records. Records resulting from specific transactions of official business made or received by all contractors in the process of performing work for NASA under the terms of their respective contracts. Such records, in the physical custody of the contractor, are NASA property and are to be accounted for, maintained, safeguarded, preserved, and disposed of as NASA records. Long-term and permanent records are eventually turned over to NASA for storage in local staging areas or retired to FRCs. Corporate records of a contractor's intracompany operations or private business are exempt.

NASA Records Retention Schedule. Document (NRRS 1441.1) providing mandatory instructions for what to do with records no longer needed for current business, with provision of authority for the final disposition of those records. Approved by NARA as the official standard for appraising, accessioning, and preserving all NASA records.

National Archives and Records Administration (NARA). The Agency responsible for appraising, accessioning, preserving, and making available permanent records.

Non-records. Documents not meeting the definition set forth under records including extra copies kept only for convenience of reference, stocks of publications and of processed documents, and library or museum materials intended solely for reference or exhibition.

Originator. The individual who creates or receives records. Also called consignor.

Personal Papers. Documentary materials belonging to an individual that are not used to conduct Agency business. Related solely to an individual's own affairs or used exclusively for that individual's convenience. Must be clearly designated as such and kept separate from Agency records. Also called personal files or personal records.

Permanent Records. Records appraised by NASA/NARA as having sufficient historical or other value to warrant continued preservation by the Federal Government beyond the time needed for administrative, legal, or fiscal purposes. Also called archival records.

Records. All recorded information, regardless of physical form or characteristics, made or received by an Agency of the United States Government 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 the data in them.

Records Management Program (RMP). Supports the Records Manager in the oversight and the operation of records management policies and procedures. The RMP is organizationally located in the Agency Office of the CIO on the Information and Data and Analytics (IDAS) Service Line.

Records Schedule. Predefined determination of the retention of all Government records jointly agreed upon by NASA and NARA.

Retention Period. The amount of time a record is to be kept until final disposition. Retention periods and disposition requirements are specified in NRRS 1441.1.

Temporary Record. Records approved by NASA/NARA for disposal, either immediate or after a specified retention period.

Unscheduled Records. Records created or received by an organization that do not fit into any of the approved schedules in NRRS 1441.1.

VCK Database. Also Visual Corporate Keeper, an off-the-shelf, commercial software used by the RMP to manage and track the inventory of inactive records stored at ATF.

Appendix B. Acronyms

ATF Armstrong Test Facility

BMS Business Management System

CIO Chief Information Officer

CFR Code of Federal Regulations

CO Contracting Officer

CPAR Corrective and Preventive Action Report

DA Destruct Authorizations

FRC Federal Records Center

GLP Glenn Procedure

GLPR Glenn Procedural Requirements

GRC Glenn Research Center

NARA National Archives and Records Administration

NPD NASA Policy Directive

NPR NASA Procedural Requirements

NRRS NASA Records Retention Schedule

ORI Organizational Records Inventory

PII Personally Identifiable Information

RLO Records Liaison Officer

RM Records Manager

RMP Records Management Program

VCK Visual Corporate Keeper

Appendix C. Records

- D.1 Form GRC 273, Destruct Authorization Template
- D.2 Organizational Records Inventory (ORI) System
- D.3 Form GRC 446, Appointment of Records Liaison Officer
- D.4 Visual Corporate Keeper (VCK) Inactive Records Storage Database
- D.5 GRC Inactive Records Storage SharePoint

Change History

| Revision/Change | Effective Date | Description/Comments |
|-----------------|-----------------------|--|
| Basic | 6/27/07 | Document converted from a Center Level Procedure (CLP) (GRC-P3.7.3) to GLPR, adding AS9100 requirements, renaming of Division Records Representatives to Records Liaison Officers and general editing |
| Change 1 | 08/01/07 | Corrected numbering in Section 2 (Administrative change only) |
| A | 12/03/07 | Amended sections P5.Measurement/Verification, Chapters 2 Responsibilities, section 2.4, Records Manager, section 2.3 Center Organizations and section 2.6 Records Liaison Officers; General editing |
| В | 4/2/10 | Amended section 3.3, Organizational Records Inventory Maintenance; deleted flowcharts |
| С | 5/29/2012 | Updated GLPR to reflect changes in the inactive records storage process; added section 2.10, Records Owners; amended sections 2.6, 2.8, and 3.3. Eliminated section 2.8. Updated format and content requirements per GLPR 1410.1. |
| D | 4/8/2013 | Updated the Responsibility Section 2.6 for Center Organization to clarify requirements regarding the completion of the C-278; including Section 3.3b. Added Appendix B, Acronyms. |
| E | 5/7/2014 | Added new section 3.3 to formalize requirements for authorizing destruction of records in storage past retention. Existing section 3.3 was renumbered to 3.4. Changed the forms prefix from C to GRC. |
| Change 1 | 11/15/2016 | Changes made to reflect new structure and citation of the NASA Records Retention Schedule (NRRS 1441.1) and the GRC Records Management Program's new Destruct Authorization Form, GRC273. Updated applicable documents. |
| Change 2 | 02/21/2018 | Administrative Change to 3.1.5, replacing Records Liaison Officer with Records Management for posting GRC 278s to the BMS library. |
| F | 08/01/2019 | Table of Contents updated to meet current formatting. P.2.c – Updated applicability statement to meet revisions of NPR 1400.1H. P.4 Updated/Removed outdated applicable documents. P.5 Removed "shall" statements per NPR 1400.1H Chapter 1 from revision E incorporated Introduction (Policy and NRRS 1441.1 in P1 Purpose) and list of records into new Appendix D. Added new section 1.10 that includes responsibilities specific to Program and Project Managers. |

| G | 04/30/2024 | Updated ownership and responsibility of Records Management function from the Logistics and Technical Information Division to the Office of the CIO. Replaced references to the GRC-278 form to the agency Organizational Records Inventory tool and updated process in Chapter 2.4 Updated records storage process in Chapter 2.2 to reflect transition from paper to electronic records. Updated to meet requirements of GLPR 1410.1 |
|----------|------------|--|
| Change 1 | 06/20/2024 | Administrative changes: Clarify process per National Quality Assurance audit. |