Fermilab Records Management Assessment Report

Office of Quality and Best Practices
Fermi National Accelerator Laboratory
Batavia, IL
July, 2011

Approved By: _____

John Robert Grant
Head, Office of Quality and Best Practices
Fermi Research Alliance, LLC

1.0 Background

To determine Fermilab's level of compliance with the Integrated Quality Assurance (IQA) requirements, the Office of Quality and Best Practices (OQBP) is performing a series of assessments of the implementation and effectiveness of QA controls in each Division, Section and Center (D/S/C). This document provides a lab-wide summary and conclusions for Records Management Program requirements distilled from individual D/S/C reports.

Records management assessments were conducted between March and May 2011 by interview, observation of work, and examination of work products, documents, records, file plans and Individual Training Needs Assessments (ITNAs). Assessment teams interviewed Records Coordinators and records generators from each D/S/C, and Records Custodians from seven of eight D/S/Cs. Information Resources Department staff were also interviewed.

2.0 Results & Conclusions

Records management requirements found in IQA Chapter 4 and on the Fermilab Records Management Program web site have been met and effectively implemented in all four Sections assessed: Business Services Section (BSS), Environment, Safety, and Health (ES&H), Facilities Engineering Services Section (FESS), and Workforce Development and Resources Section (WDRS) but only partially met by the four Divisions. Some opportunities for improvement in the Information Resources Department's Records Management Program were identified as observations.

Records management requirements are met and effectively implemented in the Sections assessed.

- No findings of noncompliance were observed in the four sections assessed
- Three of the four Sections have file plans covering their entire organization posted on the Records Management Program web site
- One Section has submitted file plans covering all its organizations to the Records Management Administrator for posting to the web site

Records management requirements have been partially implemented in the Divisions assessed.

- Organizational file plan coverage on the Records Management Program web site varies between 0% and 50% for all four Divisions but 100% coverage is required
- In one division only 89% of employees have taken the online records management training while the overall Fermilab level is 94%.
- In one division file custodians have not been assigned
- In two divisions file plans were missing required record types

Opportunities for improvement in Information Services Records Management Program include:

- File plan organizational requirements (by department versus by function) are not clearly defined and are interpreted differently by different organizations
- It is not clear if record destruction is required at the end of the defined record retention period or if there are criteria and methods for retention beyond the prescribed interval.
- The definitions of "active" and "inactive" records are unclear in the Records Management Handbook and are being broadly interpreted within assessed organizations (see above)
- Two different definitions of records are found on the Records Management homepage - one from the Records Management Handbook, the other from 44 USC Section 3301

Records Management training has produced effective results.

- Ninety four percent of Fermilab personnel have taken the required online training
- All persons interviewed during the assessment have taken the required online training

- Records Coordinators and File Custodians of at least two of the D/S/Cs have also had received individual training from with the Records Administrator on the additional requirements of those positions. All persons interviewed were able to identify the records they produced, and to locate the official versions of those records within the records management system
- Although personnel in two D/S/C's were unsure how to store records received via email or email attachments, interviewees in the remaining six D/S/C's stated that they remove the records from the email system and store them on shared drives or print them out and store them as hard copies
- Formal tracking of records sent to offsite storage is performed in 6 D/S/Cs, either through the use of the Records Storage and Disposition form (RSD) or through a database or both

Corrective Action Plans (CAPs) were issued to AD, CD, PPD, and TD for incomplete implementation of Records Management Program requirements.

3.0 Findings

Five findings of noncompliance with requirements for records management were identified. Five CAPs were issued to address these findings.

- AD-20110325-01: File plans have not been implemented in accordance with the Records Management Program for all Accelerator Division departments
- CD-2011-06-01-1: The requirements of the Fermilab Records Management Program, as specified in the Records Management Program documents have not been fully implemented within CD
- TD-20110422-01: File plans have not been implemented in accordance with the Records Management Program for TD departments
- PD-2011-04-25-1: Nine out of eighteen file plans are published on the BSS website
- PD-2011-04-24-2: Fifty-six out of four hundred twenty-seven persons have not taken the required Records Management training as of the time of the assessment

4.0 Observations & Recommendations

Observations and recommendations are written to address opportunities for improvement which are either outside the scope of the assessment or are isolated incidents. Twenty-four observations and recommendations were made. They are categorized as follows:

- Seven observations for issues with managing records – records exceeding retention periods, records stored in email and redundant hard copy and electronic copies
- Five observations for issues with file plans – missing records, out of date records, plans containing non-records
- Twelve observations for a variety of issues with records management knowledge or records management information communication, no procedure for hard copy PII controls. See section 2.0 for observations identified with the Information Services Records Management Program.

5.0 Commendable Practices

Four commendable practices were noted as follows:

- The Records Management Database is used to log events requiring records management action. The database includes entries such as: people leaving or transferring from the division, records of RSD forms, correspondence relative to records disposition, and movement of records to off-site facilities. This database is an effective mechanism for organizing and storing information needed to perform and track records management activities. (AD)
- The Vector database is an effective repository for storing electronic records of Travelers as well as a good "green initiative" for eliminating large amounts of paper records. (TD)
- The Mechanical Engineering Department has as part of its personal performance evaluation the requirement that all engineering notes have hard copies filed with the department file system,

and electronic documents be posted on project document data bases. This practice has the effect of integrating Records Management practices into everyday work processes. (PPD)

- CD has provided supplemental training to divisional staff in records management in the form of management presentations and newsletter correspondence.