

SUBJECT:	Fermilab Assessment Manual – Chapter 4 Independent QA Assessment Procedure – Form 2	NUMBER:	3902.1004 FORM 2
RESPONSIBILITY:	Quality Assurance Manager	REVISION:	001.2
APPROVED BY:	Head, Office of Quality and Best Practices	EFFECTIVE:	12/09/2010

Fermilab Independent QA Assessment Report	
Assessment Number & Title:	11-IA-QA-009-BSS Records Management Assessment Version: 01
Date(s) of Assessment: 5/3/11 – 5/6/11	
Performing Organization: Office of Quality & Best Practices	
Assessed Organization(s): Business Services Section (BSS):	
<ul style="list-style-type: none"> • Property & Inventory Control Department <ul style="list-style-type: none"> ○ Property Management Group • Transportation Service Department, Traffic/Shipping Group • Accommodations, Housing Office • Information Resources Department • Section Office 	
Report content	
<p>The main body of this report contains the following sections:</p> <ul style="list-style-type: none"> • Assessment Activities & Scope • Scope Limitations • Activities Reviewed Within this Assessment • Description of the Implementation & Effectiveness of Observed Activities • Conclusions • Findings • Observations & Recommendations • Commendable Practices 	
Assessment Activities & Scope:	
<p>Implementation and effectiveness of controls for Records Management relative to the requirements of the Integrated Quality Assurance (IQA) program and records management program documents (listed in the “Standards, Regulations, and Other Program Requirements Applied” section of this report) were examined via interview, observation, and document review. These controls were examined within the BSS organizations listed in the “Assessed Organization(s)” section of this report.</p>	
Scope Limitations:	
None.	
Activities Reviewed Within this Assessment:	
<p>Records management activities were reviewed during this assessment for the listed organizations, including:</p> <ul style="list-style-type: none"> • Housing/accommodations management 	

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- Packaging and shipping operations
- Stock warehousing
- Property management
- Administrative functions
- Scrap and excess material inventory and sales
- Records management program
- File Custodian
- Records Coordinator

Description of the Implementation & Effectiveness of Observed Activities:

Records Management:

The requirements of the Fermilab Records Management Program, as specified in IQA Chapter 4 and Records Management Program documents are met and effectively implemented within the BSS organizations assessed. Interviewees were knowledgeable in the requirements of the program and their responsibilities for records maintenance.

The BSS Records Coordinator, two File Custodians, and four records generators were interviewed. All seven interviewees had completed the required Fermilab Records Management training, as documented within the TRAIN system. Within BSS, records training has been completed by 93.8% of all employees.

The BSS record management organization consists of a File Custodian within each of nine departments, plus the Records Coordinator in the section office. Records are controlled in eleven file plan sets (hardcopy & electronic plans) within BSS. File plans for the four departments examined are included in the “Documents Reviewed” section.

None of the seven interviewees indicated that they currently have records maintained off site. All indicated they have adequate space locally for required record storage. Other departments within the section utilize offsite storage as demonstrated by the Records Coordinator (File01). Interviewees knew to contact the Records Coordinator or Records Manager to arrange for offsite storage. A database containing a listing of records stored off site is maintained within FileMaker Pro (File02).

All interviewees indicated that they maintain no electronic records except for network databases. In one instance, an interviewee indicated work order photographs (electronic versions) are maintained on a shared drive pending invoice payment, but are not maintained as long term records. All indicated they maintain no records within email systems. Any relevant records transmitted or received via email systems are printed out and maintained as hardcopy records. An observed example of a shipping record package is attached as File03, where an email correspondence references two attachments.

At least 15 other record types were examined in the course of this assessment. The records randomly requested in the course of discussions were all readily produced upon request. Practices for record retention varied across the areas assessed. In all areas assessed, the selected records examined were maintained for at least the minimum retention periods called for in the file plans. Two of seven interviewees indicated they maintain records beyond their scheduled retention time. Examples of records examined are included as File04 through File08.

As a part of this assessment, a review of Records Management program requirements was conducted with

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the Information Resources Department (IRD) - the owners of the Records Management program within BSS. The intent of this review was to forward questions or misconceptions raised in the course of conducting Records Management assessments to the IRD for consideration and resolution. Suggestions are noted in the Observation/Recommendations section of this report.

Conclusions:

The requirements of the Fermilab Records Management program are met and fully implemented within BSS. Interviewees understood the requirements of the records management program and were in compliance with records maintenance requirements. Some interviewees did not have direct program experience with offsite records storage, but all interviewees knew where to find program information or whom to consult for guidance. File plans are clear and concise and were supported by the samples examined.

Findings:

1. None.

Observations and Recommendations:

1. **Observations:** Records observed in several areas such as Housing and Shipping are retained past their scheduled retention times.

Recommendation: Management should consider the need to maintain documents past their scheduled retention, dispose of them if appropriate, and establish procedures for periodic purging of obsolete records.

2. **Observation:** Records Management program requirement for file plan organization (by department vs. by function) is not clearly defined and is being interpreted differently by different organizations.

Recommendation: IRD should consider revising handbook requirements to clarify appropriate file plan organization.

3. **Observation:** Record retention intervals are being commonly interpreted as minima. Program requirements are not clear whether record destruction is required at the end of the prescribed interval.

Recommendation: IRD should consider emphasizing risk assessment as part of record retention decisions to D/S/C's and clarifying retention and destruction requirements in the Records management Handbook and training. IRD should consider explicit criteria for maintaining records beyond stated retention intervals. If any types records should not be kept beyond their stated retention periods for regulatory, statutory or other reasons, the criteria should define them to protect the laboratory from potential negative outcomes.

4. **Observation:** The definitions of "active" and "inactive" records is unclear as defined in the Records Management Handbook and are being broadly interpreted within assessed organizations.

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Recommendation: IRD should consider clarifying this definition in the handbook and training and aligning it with the DOE terms “current” and “noncurrent”.

- Observation:** One interviewee indicated the perception that the BSS link to the "DOE Records Retention Rules" unnecessarily complicates the perceived Fermi requirements and causes confusion.

Recommendation: As of this report’s date, this link has been moved to a “For Records Staff” section of the Records Management Handbook.

- Observation:** It was noted there are two different definitions of records on the Records Management homepage. One is taken from the Fermilab Handbook; the other is taken from 44 USC Section 3301.

Recommendation: As of this report’s date, the definitions have been revised. Only the Fermilab Handbook definition is presented.

Commendable Practices:

- None.

Names of Person Interviewed:

- Cheryl Bentham
- Scott Borton
- Kathryn Duerr
- Al Elste
- Jack Hawkins
- Jack Kelly
- Mari Mendez
- Heath O’Connell
- Dale Wilderspin

Documents Reviewed:

- Housing File Plan
- Housing Electronic Records
- IRD File Plan
- IRD Electronic Records
- Property File Plan
- Property Electronic Records
- Section Office File Plan
- Section Office Electronic Records
- Transportation File Plan
- Transportation Electronic Records

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(See also “Attachments” section below)

Standards, Regulations, and Other Program Requirements Applied:

The specific criteria applied to this assessment were:

- 1001 Fermilab Integrated Quality Assurance (IQA)
Chapter 4 – Documents and Records
- Records Management – Information for Records Staff
- Fermilab Employee Records Management Handbook
- Fermilab Email Records Procedures
- Records Management – Eliminating Non - Records
- Records Management Exit Procedures
- Records Management – Employee Termination Procedures

Describe or List Any Other Assessment Methods Used: None.

Corrective Action Plans Issued:

None.

Assessors’ Names (asterisk indicates team leader):

Kurt Mohr* - OQBP
Don Rohde - AD

Submitted by: Kurt Mohr

Date: 06/27/2011

Distribution (Distribute to assessed organizations’ management, OQBP head, and other interested parties):

Dave Carlson	Bob Grant
Frank Cesarano	Jed Heyes
Jeff Irvin	Don Rohde
	Ed Vokoun

Attachments:

- File01 – Records Storage Request Correspondence.pdf
- File02 – Offsite Records Storage Listing.pdf
- File03 – Shipping Record Package.pdf
- File04 – Housing Cash Receipts.pdf
- File05 – Housing Maintenance Report.pdf
- File06 – Housing Occupancy Report.pdf
- File07 – Property Loan Agreement.pdf
- File08 – Shipping Order Records.pdf