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| 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 |

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| Fermilab Independent QA Assessment Report | |
| Assessment Number & Title: | 11-IA-QA-009-CD Records Management Assessment Version: 001 |
| Date(s) of Assessment: | 4/18/11 – 4/22/11 |
| Performing Organization: | Office of Quality & Best Practices |
| Assessed Organization(s): | Computing Division (CD): <ul style="list-style-type: none"> • Office of the CIO • Division Administrative Support • DAQ Controls and Timing • Service Desk |
| 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 <p>Assessment Activities & Scope:</p> <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 “Requirements Applied” section of this report) were examined via interview, observation, and document review. These controls were examined across the CD organizations listed in the “Assessed Organization(s)” section of this report.</p> <p>Scope Limitations:</p> <p>None.</p> <p>Activities Reviewed Within this Assessment:</p> <p>Records management activities were reviewed during this assessment for the listed organizations, including:</p> <ul style="list-style-type: none"> • Records Coordinator • ProCard records maintenance • Software licensing records maintenance | |

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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 only partially implemented within CD. The controls are effective in those areas where the implementation of program requirements is complete. In other areas, informal controls are in place to meet the division’s needs. CD has an assigned Records Coordinator, however there are no assigned File Custodians. All record types in use within CD are not reflected in the divisional file plan (File01). Some examples of potential record types discussed, but not reflected in the file plan are calibration records, security reports, and some design and engineering documents. Although some electronic records are maintained through other systems within the division, such as DocDB, there is not an electronic records file plan.

Records management training was assigned to and completed by all interviewees. The divisional Records Management course completion rate is 96.7%. Although there was some lack of clarity on the part of the interviewees regarding the definition of a record, they were otherwise aware of the responsibilities for record management for those records under their control as observed by their practices for ProCard and software licensing records maintenance. Two examples of records management awareness training provided within the division were viewed and are attached. A divisional newsletter article (File02) was distributed to all divisional personnel and PowerPoint slides (File03) were presented at a management meeting.

The records identified within CD are maintained within a single file plan by the Records Coordinator. Seven individual record types are identified on this file, with some being maintained by the Coordinator and others by specific records generators. Specific ProCard and software licensing records maintained by generators were reviewed by the assessment team. These records were in order and well maintained. ProCard records included original purchase information, invoices and monthly reconciliations between the two as required by ProCard policies. Samples of software licensing records viewed are attached as File04 and File05.

All interviewees indicated that no email messages are defined or maintained as records within their areas of responsibility, however two of those interviewed indicated that some emails may provide direction for their actions, such as transitory ProCard authorizations or design change notification. In these examples, subsequent formal approval would serve as the records of these actions. The concept of the email “steward” and ownership of emails from a records management standpoint was not well understood by two of the interviewees.

While most records are stored locally, others are stored off-site as needed. Records maintained off-site are listed on a Records Storage and Disposition (RSD) form (File06). None of the interviewees indicated direct experience with records destruction beyond their scheduled retention date. Two interviewees with records maintenance responsibilities indicated that records are maintained beyond the scheduled retention time for reference purposes. This was confirmed by observation by the assessment team.

Conclusions:

The requirements of the Fermilab Records Management program are not fully implemented within CD. In

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discussions with interviewees, it was understood that further records management controls are planned but not yet implemented, such as the assignment of subject matter expert file custodians. Several record types maintained by the division are not reflected in the divisional file plan. To the extent implemented, interviewees were aware of the program requirements and had received training as required.

Within the areas assessed where the program requirements are implemented, as indicated by inclusion within the file plan, records observed were well maintained.

Findings:

1. The requirements of the Fermilab Records Management program, as specified in the Records Management program documents have not been fully implemented within CD.

The Fermilab Employee Records Management Handbook states that “Each of the Laboratory’s D/S/C is responsible for developing file plans for their offices and departments according to these [DOE] retention schedules.” (page 10, paragraph 5). CD has a single file plan which does not include several record types identified in the course of this assessment.

The handbook further states that “At the local level, File Custodians assist employees in the identification, inventory and maintenance of records in the workplace” (page 9, paragraph 2). CD has no assigned File Custodians within its groups or departments.

Observations and Recommendations:

1. **Observation:** In the course of conducting interviews, several records types were discussed which the interviewees agreed might be considered as records, but are not currently listed in the file plan. Among these were design drawings, calibration records, and email messages requesting or authorizing expenditures, such as ProCard purchases or software license renewals.

Recommendation: The records definition provided within the handbook section “What is a Fermilab Record?” should be reviewed and potential records throughout the division be re-evaluated in light of the questions and examples provided. Email communications should also be reconsidered relative to whether they are records.

Commendable Practices:

1. CD has provided supplemental training to divisional staff in records management in the form of management presentations and newsletter correspondence. This can serve a valuable purpose in communicating specific divisional policy towards record management.

Names of Person Interviewed:

Griselda Lopez
 Irwin Gaines
 Mark Leininger
 Greg Deuerling
 Cecelia Bruce

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Documents Reviewed:

- CD_File_Plan.pdf (File01)
- ProCard records
- Software licensing agreements

(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 (rev. 1/1/10)
- 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:

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

Assessors’ Names (asterisk indicates team leader):

Kurt Mohr* - OQBP
Don Rohde - AD

Submitted by: Kurt Mohr

Date: 06/1/11

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

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| Bakul Banerjee | Bob Grant |
| Bill Boroski | Jed Heyes |
| Mark Leininger | Don Rohde |
| Mark Kaletka | Ed Vokoun |
| Patty McBride | |
| Bob Tschirhart | |
| Vicky White | |
| Steve Wolbers | |

Attachments:

- File01 - CD_File_Plan.pdf

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- File02 - CD Tracks Feb2011.pdf
- File03 - Records.pdf
- File04 - MathWorks.pdf
- File05 - HUP_TC.pdf
- File06 - Record Storage Disposition_Luann.pdf