

NCA RECORDS AND INFORMATION MANAGEMENT

1. REASON FOR ISSUE: This is the five-year review of existing National Cemetery Administration (NCA) policy and guidance regarding all records (including, but not exclusively paper or electronic) and information management. This publication updates previous policy and guidance.

2. SUMMARY OF CHANGES: Changes to this policy include:

a. Revisions to the purpose statement to clarify that this NCA directive supplements and implements department level policy and guidance regarding records management.

b. Expanding the policy section to clarify NCA specific policy for implementing a records management program.

c. Expanding the description of roles and responsibilities to include all levels of responsible offices in NCA.

d. Revisions to the references section.

e. Revisions to the definitions section to simplify and avoid unnecessary duplication of definitions of terms that are defined in regulation or in VA Handbook 6300.1.

f. Adding an Appendix of records management guidance, some of which was previously contained in NCA Handbook 6300.01.

3. RESPONSIBLE OFFICE: National Cemetery Administration, Business Requirements and Transformation Service (43E), 810 Vermont Avenue, NW, Washington, DC 20420, is responsible for the contents of this directive. Questions may be referred to the NCA Records Management Officer, within the Business Requirements and Transformation Service.

4. RELATED PUBLICATIONS:

a. VA Directive 6300 Records and Information Management.

b. VA Handbook 6300.1 Records Management Procedures.

c. VA Handbook 6300.2 Management of the Vital Records Program.

d. VA Handbook 6300.2/1 Management of the Vital Records Program.

e. VA Handbook 6300.4 Procedures for Processing Requests for Records Subject to the Privacy Act.

f. VA Handbook 6300.8 Procedures for Shipment of Records to the Department of Veterans Affairs (VA) Records Center and Vault in Neosho, Missouri.

5. RESCISSIONS:

a. NCA Handbook 6300.1 Records and Information Management Procedures (March 13, 2018) is rescinded.

b. NCA Directive 6300 NCA Records and Information Management (March 13, 2018) is superseded by this publication.

6. RECERTIFICATION: This document is scheduled for recertification on or before the last day of February 2028.

/s/
Matthew T. Quinn
Under Secretary
for Memorial Affairs

Distribution: Electronic

NCA RECORDS AND INFORMATION MANAGEMENT

1. PURPOSE AND AUTHORITY:

a. This Directive provides the Department of Veterans Affairs (VA) National Cemetery Administration (NCA) policy and guidance for the creation, maintenance, and disposition of Federal records. It supplements policy and guidance provided in VA Directive 6300, Records and Information Management, and VA Handbook 6300.1, Records Management Procedures and applies to NCA records in all media and formats at all NCA locations.

b. The statutory authority for NCA's records and information management program derives from the Federal Records Act (FRA) of 1950, as amended. See chapters 21, 29, 31, and 33 of title 44 United States Code (U.S.C.). Federal agency records management programs must comply with regulations published by both the National Archives and Records Administration (NARA) and General Services Administration (GSA). Relevant NARA regulations are contained in parts 1220 through 1239 of title 36, Code of Federal Regulations (CFR) and GSA regulations are contained in 41 CFR Parts 102 through 193.

2. POLICY:

a. NCA will comply with applicable statutes, regulations, and Department-level policy and guidance for the creation, maintenance, use, and disposition of records. This includes application of criminal and civil penalties for willfully violating the Privacy Act, or any other applicable Federal confidentiality statutes, or willfully destroying records and information in violation of approved records control schedules.

b. NCA will maintain an essential records program to identify, maintain, and store legal, financial, vital, or other essential temporary and permanent records, in both analog and electronic formats, with appropriate metadata, at the NARA Federal Center or internal NARA-approved facility. The program will include retention schedules of vital and essential records that may be needed during and following a national emergency or local natural or technological disaster to ensure continuance of essential VA activities.

c. NCA records will be managed effectively and efficiently throughout their life cycle (creation, maintenance, use, and disposition), to facilitate the preservation of records in accordance with applicable statutory and regulatory requirements, and to promote access to information by NCA employees, agency partners, and the public, as appropriate.

3. RESPONSIBILITIES:

a. **The Principal Deputy Under Secretary for Memorial Affairs will:**

(1) Initiate investigations of any allegation of noncompliance with the Federal Records Act (FRA), Freedom of Information Act (FOIA), Privacy Act (PA), Health Insurance Portability and Accountability Act (HIPAA), or a VA confidentiality statute; and contact the VA Office of General Counsel (OGC) for such violations.

(2) Report certain substantiated allegations, i.e., willful and intentional violations, to the Inspector General pursuant to 38 CFR §§ 1.200 - 1.203.

b. **Deputy Under Secretary for Management** will establish and maintain NCA's records management program to include essential records, in accordance with applicable laws, regulations, and policies.

c. **Deputy Under Secretaries, Senior Executives, District Executive Directors, Cemetery Directors, Central Office Service Directors, and Equivalent Level Managers and Supervisors** will:

(1) Ensure employees under their respective level of control meet all requirements for the creation, maintenance, use, storage, and disposition of Federal records generated or obtained within their operations.

(2) Designate in writing one primary RLO and one alternate RLO to manage and coordinate the records management activities for their respective office, cemetery, or organization. Provide copies of the written designation to the NCA Records Management Officer (RMO) (see paragraph 3.f. of this directive) and to each designated employee. **NOTE:** NCA Central Office (NCACO) collocated offices may designate one primary RLO and one alternate RLO to manage and coordinate the records management activities for those within 810 Vermont N.W. and 1575 I Street N.W. offices, and other assigned NCACO offices, in coordination with the Chief of Staff.

(3) Require designated RLOs to complete TMS course "Records Management for Records Officers and Liaisons" annually and other applicable records management training, as assigned.

(4) Coordinate with the Business Transformation and Requirements Service (BTRS) Director and the NCA RMO to complete quarterly facility self-assessments, as developed by VA's Office of Information Technology, Privacy and Records Assessment Directorate (PRAD), by the last workday of each quarter, and other requirements as specified on the NCA "BTRS: Privacy and Records Management Assessment Directorate (PRAD)" intranet page (for internal VA employees only).

d. **Business Transformation and Requirements Service Director** will:

(1) Implement the Records Management Program for NCA in accordance with applicable laws, regulations, and policies.

(2) Monitor the NCA Records Management program's compliance and, as needed, report Administration-level performance to the VA Chief Information Officer, or designee.

(3) Notify the Director, VA Records Management Service of the names and contact information for NCA's designated Records Management Officer (RMO) and alternates.

(4) Ensure the NCA RMO completes the NARA Federal Records Management Training within one (1) year of designation, pursuant to Office of Management and Budget (OMB) directive M-12-18 and remains current on programs and processes through annual refresher training.

(5) Seek advice and assistance, as needed, from the VA Senior Agency Official for Privacy (SAOP) or Agency Records Official concerning problems or questions of an administrative nature that arise during implementation of VA Directive 6300.

(6) Seek legal advice and assistance from VA Office of General Counsel and the appropriate District Counsel as needed to ensure legal compliance with the provisions of the laws affecting the creation, receipt, maintenance, and release of information.

(7) Review instances where a loan and exchange of records or information with other Government agencies and the National Personnel Records Center (NPRC) requires development of a Memorandum of Agreement or Understanding that meets a specific purpose.

e. The Records Management Officer (RMO) will:

(1) Promote employee awareness of this directive, VA Directive 6300, VA Handbook 6300, and related regulations, and laws governing the receipt, maintenance, disposition, and release of records and information.

(2) Inventory and appraise all NCA records for storage and disposition, including electronic records and microform media, which the organization authorizes or requires to be created, collected, or maintained, in accordance with the NCA RMO standard operating procedures (SOP).

(3) Maintain a current and complete list of primary and alternate RLOs as designated under paragraph 3.d. above.

(4) Establish, publish, and maintain on the NCA intranet a comprehensive NCA records control schedule (RCS) that applies to all NCA records.

(5) Submit the NCA RCS to NARA for approval.

(6) Apply the standards and procedures contained in the NARA guidelines titled, "NARA Guidelines for Digitizing Archival Materials for Electronic Access," and "The

Selection and Preparation of records for Publication on Microfilm” and other applicable references used to manage microform media.

(7) Review records control schedules, file plans and procedures to ensure that they are current and coordinate with NCA RLO’s to update them as needed.

(8) Develop standardized file plans and indexing approaches where appropriate to simplify the use of, access to, and integration of information within the organization.

(9) Evaluate all records and assist NCA RLO’s with requests to retain and dispose of records, in compliance with applicable authorities and policies referenced in this directive.

(10) Conduct a program of regular internal records management reviews to assist RLOs in implementing appropriate records management procedures.

(11) Assist in the planning and implementing of automated or manual information systems to assure that records or information created and generated will be properly scheduled and placed in the organization’s records control schedule.

(12) Implement a vital records program in accordance with the VA-wide program (see VA Handbook 6300.2).

(13) Support NCA District Directors, NCA Cemetery Directors, and their equivalents in accomplishing quarterly PRAD facility self-assessments by the last workday of each quarter.

(14) Provide guidance, training, assistance, and information to NCA employees about the proper maintenance and disposition of all records in all formats.

f. Records Liaison Officers (RLOs) will:

(1) Manage and preserve records which contain adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the office and are designed to furnish the information necessary to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities.

(2) Complete TMS course, “Records Management for Records Officers and Liaisons” annually and other training, as required.

(3) In coordination with the NCA RMO:

(A) Establish and maintain an active, ongoing program for the creation, maintenance, use, storage, management, and disposition of federal records generated or obtained under the NCA RCS, as it applies to their respective district cemetery, program office, or facility.

(B) Inform the NCA RMO of any need to evaluate or schedule records and/or revise existing records control schedules.

(C) Seek advice and assistance, as needed, from the NCA RMO concerning problems or questions of an administrative nature that arise during implementation or operation of the program established by this directive.

(D) Notify the NCA RMO of any actual, impending, or threatened unlawful destruction or mishandling of records and assist in their recovery.

(E) Complete quarterly PRAD Facility Self-Assessments (FSA) by the last workday of each quarter; see guidance on the NCA "BTRS: Privacy and Records Management Assessment Directorate (PRAD)" intranet page.

(F) Complete the PRAD pre-assessment preparation, assessment engagement, and post-assessment corrective actions to review, manage, and improve the records management program, as indicated on the NCA "BTRS: Privacy and Records Management Assessment Directorate (PRAD)" intranet page.

4. REFERENCES:

- a. 5 U.S.C. § 552, Freedom of Information Act.
- b. 5 U.S.C. § 552a, Privacy Act of 1974.
- c. 44 U.S.C. Chapter 31, Records Management by Federal Agencies
- d. 44 U.S.C. Chapter 33, Disposal of Records.
- e. 44 U.S.C. §3506, Federal Agency Responsibilities.
- f. 36 CFR Chapter XII, Subchapter B, National Archives and Records Administration, Records Management.
- g. 38 CFR §§ 1.500 through 1.527, Release of Information from VA Claimant Records.
- h. 38 CFR §§ 1.550 through 1.562, Procedures for Disclosure of Records Under the Freedom of Information Act.
- i. 38 CFR §§ 1.575 through 1.582, Safeguarding Personal Information in Department of Veterans Affairs Records.
- j. 41 CFR Part 102-193, Creation, Maintenance, and Use of Records.
- k. VA Directive 6300, Records and Information Management.
- l. VA Handbook 6300.1, Records and Information Management Procedures.

m. Office of Management and Budget Circular A-130, Managing Federal Information as a Strategic Resource (last updated July 28, 2016, see 81 FR 49689).

n. Memorandum for the Heads of Executive Departments and Agencies and Independent Agencies OMB M-12-18, Managing Government Records Directive.

o. NARA Bulletin 2012-02, Guidance on Managing Content on Shared Drives.

p. NARA Bulletin 2017-02, Guidance on Senior Agency Officials for Records Management.

q. NCA Records Control Schedule (available for internal VA employee use on the NCA intranet).

5. DEFINITIONS:

a. **Facility Self-Assessment (FSA).** VA's Office of Information and Technology, Privacy and Records Assessment Directorate (PRAD) uses the FSA program as a means of conducting ongoing monitoring to assess each facility's Privacy and Records Management Programs for compliance with applicable policies, statutes, and regulations. These quarterly self-assessments also allow each site's performance to be monitored and evaluated to identify weaknesses and areas of non-compliance to set priorities for risk mitigation and program, improvement. Over the course of a fiscal year, the FSA provides PRAD with a snapshot of the site's perspective of their Privacy and Records Management Program performance. The FSA identifies and focuses remediation efforts toward non-compliant areas to reduce risks associated with non-compliance. The FSA program enables the identification of compliant areas, to celebrate successes, and identify best practices. Note: The FSA period begins on the first day of the federal fiscal year (October 1). FSAs are due no later than the last workday of each quarter in accordance with 44 U.S.C. §3506, and 36 CFR §1220.34.

b. **File Plan.** The basic structure in records management which groups together records with similar characteristics. File plans can be a subset of the entire record schedule series that is specific to an organization, project, program, or location. At a minimum, a file plan includes the series, description, disposition instruction (retention) and authority, and other specific instructions which provide guidance.

c. **National Cemetery Administration Records Control Schedule (RCS).** The NCA RCS document is prepared by the Records Management Officer listing the records created and maintained by NCA or unique and specific to NCA, their retention periods, and other records disposition information. The schedule supplements the National Archives and Records Administration's (NARA) General Records Schedule and must be approved by NARA. All Federal records, in all formats, must be covered by a NARA-approved records schedule.

RECORDS MANAGEMENT GUIDELINES

1. General. This appendix establishes procedures and guidelines to ensure that all Department of Veterans Affairs (VA) National Cemetery Administration (NCA) records are managed as an asset throughout the three basic stages of their life cycle: creation, active maintenance and use, and disposition.

a. The NCA records control schedule (RCS) provides authority for prompt and orderly disposition of records when appropriate and to provide for the retention of records of permanent value. Federal statute requires the RCS.

b. The NCA RCS is the sole authority for final disposition of records under the jurisdiction of NCA and applies to all NCA records in all formats (paper, electronic, microfilm, etc.). The NCA RCS can be found on the NCA “BTRS: Privacy and Records Management Assessment Directorate (PRAD)” intranet page.

c. Three NCA records schedules were approved by NARA in 1985: NC1-15-85-9 for VACO records; NC1- 15-85-14 for NCA District Office records; and NC1-15-85-15 for National Cemetery records. A schedule for BOSS/AMAS electronic files was approved in 2000 as NC-15-99-4. The comprehensive NCA RCS, available on the NCA “BTRS: Privacy and Records Management Assessment Directorate (PRAD)” intranet page, integrates record schedules from the NARA GRS which are applicable to NCA and the other NCA specific RCS documents into one comprehensive guide.

2. Documentation of Official Actions and Activities.

a. Essential information on NCA major actions or activities must be incorporated into an official record of finalized work products. Due to the level of responsibility, Senior Executive Service (SES) personnel may create permanent NCA records. Care should be taken that these individuals’ work products and e-mails are maintained per the RCS, GRS, or the Capstone program.

b. Good filing practices include filing only what is necessary, filing in a way that facilitates records access and disposition, and filing consistently. Files will be maintained in accordance with the retention and disposition instructions contained in the NCA RCS, available on the NCA PRAD intranet page. Examples of file plans and electronic folder structures are provided in the NCA RMO SOP, available on the NCA PRAD intranet page.

3. Scheduling.

a. Records scheduling is the process of appraising records and developing instructions for actions regarding record and non-record materials when they are no longer actively needed for Federal business.

b. When an RLO identifies a need to delete or revise an existing NCA RCS, or create a new schedule to manage records, the RLO will contact the NCA RMO to develop an appropriate schedule for NARA approval.

4. Retention. All records and recorded information will be classified as record or non-record through the record review process (see VA Handbook 6300, chapter 8, for procedures related to records appraisal). Retention of records varies based upon their ongoing legal, fiscal, historical, or administrative value. Official records can be either temporary or permanent, based upon their content and circumstances of creation and use. NCA records that are more than 30 years old, that have not been appraised since 1990, will be brought to the attention of the NCA RMO. Each record's retention period will be established upon the RCS.

5. Disposition.

a. The disposition of records is based on the type of record. Records are disposed of in accordance with the disposition instructions within the NCA RCS. The RMO will provide support to determine specific record or file types and their associated destruction time periods.

b. Temporary records may be destroyed by the office that has custody of the files, after the specified retention period has elapsed.

c. Permanent records may be stored at several different locations, based upon the content, size, type of file, and period of storage.

d. NCA employees should refer to NCA's RMO SOP and VA Handbook 6300, for further guidance on disposition of records.

6. Storage.

a. NCA records stored at a Federal Records Center (FRC) belong to NCA and can be retrieved by the NCA RMO for use or withdrawn if a change in retention or disposition is necessary.

b. Shipments of records to an FRC will be accompanied by a detailed inventory of the record contents of each box to simplify the future retrieval of specific files or folders and future lifecycle disposition.

c. Records with a Permanent designation are transferred to the custody of the National Archives, where they are available for public access.

d. If records transferred to an FRC or the National Archives are subject to release restrictions, NCA must provide a justification and cite the statute or Freedom of Information Act exemption(s) or the most recent Privacy Act Notice published for that System of Records that restricts the use or examination of the records.

e. Special non-paper media records, including microfilm, video, and audio tapes, photographs, magnetic tapes, blueprints, etc., can be easily damaged if they are not stored in areas with proper environmental controls. NCA offices with such records will work with the RMO to maintain the integrity of the media and ensure that such records are adequately protected during periods of use and storage.