

## CHAPTER 3: ROLES AND RESPONSIBILITIES

This description of roles and responsibilities begins with the Agency Head, proceeds through the usual records management network (Senior Agency Official for Records Management, Chief Information Officer, Agency Records Officer, Records Liaison, and Records Custodian), covers the Primary Organization Heads (managers and supervisors), refers briefly to other officials, and concludes with the typical staff member (employee).

### A. Agency Head (The Secretary)

1. The Secretary, as the head of the Department, is required to establish a records management program in accordance with the Federal Records Act (44 U.S.C. 3101-3106).
2. The Secretary is responsible for ensuring that:
  - a. The successful implementation of records management requirements in law and regulation are a priority for senior agency management; and
  - b. Proper resources are allocated to the effective implementation of such requirements (See 76 F.R. 75423 Presidential Memorandum – Managing Government Records, section 2(a)).
3. The Secretary must also remind employees annually of:
  - a. Records management policy, including every employee's roles and responsibilities of the program offices in maintaining and managing records; and
  - b. The sanctions for the unlawful removal or destruction of Federal records, as provided in 18 U.S.C. 2701 (concealment, removal, or mutilation of records generally).
4. The Secretary is required by 36 CFR 1230.14 to report any unlawful or accidental destruction, defacing, alteration, or removal of records in HUD's custody to NARA.

## **B. Senior Agency Official for Records Management (SAORM)**

1. The SAORM has responsibility for The Transition to Electronic Records Directive (M-19-21) of June 28, 2019, which outlines the duties and responsibilities of the Senior Agency Official for Records Management. The Directive requires all Executive branch departments and agencies to designate a senior official at the Assistant Secretary level or its equivalent to serve as the SAORM.
2. The SAORM has direct responsibility for ensuring the department or agency efficiently and appropriately complies with all applicable records management statutes, regulations, NARA policy, and the requirements of the Transition to Electronic Records Directive.

## **C. Chief Information Officer (CIO)**

1. Serves as the departmental official responsible for the process of managing information resources to accomplish agency missions, which encompasses both information itself and related resources, or assets, such as personnel, equipment, funds, and information technology (IT).
2. Coordinates with the Agency Records Officer to ensure that the design and implementation of the Department's information systems incorporate Federal and agency records management requirements.
3. Coordinates with the Agency Records Officer to ensure development and coordination of storage protocols and systems for electronically executed (e-sign) documents and digitally executed documents in accordance with federal law.
4. Coordinates with the Agency Records Officer to ensure development and/or procurement of a system for executing and storing electronically or digitally endorsed documents including those requiring a digital vault.

## **D. Headquarters Electronic Records Management Division**

The Electronic Records Management Division (ERMD) is part of the Office of Administration.

This office must:

1. Oversee the Evaluation, Training, Development, and Implementation of Records Management program activities across the entire Department both in Headquarters and the Field Operations.
2. Assist and coordinate retirement, retrieval, and transfer services for all HUD records.
3. Inspect all proposed Headquarters records shipments and retirement documents to

ensure that they follow HUD records disposition policies and that the records are eligible for retirement to a Federal records center. Return documents needing major revision and contact the preparing office when shipment needs extensive repacking.

4. Serve as principal contact with the National Archives and Records Administration, Washington National Records Center for all HUD records retirement and reference services. Maintain liaison with the National Personnel Records Center (in St. Louis, Missouri) on personnel records. Coordinates matters relating to records management with the program office's FOIA/Privacy Act Official(s), Electronic Records Management Division, system administrators, program managers, internal auditors, visiting Inspector(s) General, General Counsel, Public Affairs Officer, Web Manager, Agency Historian, and Imaging and Micrographics Manager, as well as with program officials responsible for other special media, such as audiovisual records, cartographic and architectural records, and printed records.
5. Coordinates the records management activities of a major program office, whether at Headquarters or in the Field offices and Regional offices.
6. Ensures that program office recordkeeping procedures are established, implemented, and periodically updated for all offices at all levels and for all record media, including electronic and other special records.

#### **E. Departmental Records Officer (DRO)**

1. In coordination with the SAORM and other officials, the Departmental Records Officer DRO (also known as an Agency Records Officer) oversees HUD's records management program.
2. Ensures that the Department has an up-to-date records management directive.
3. Creates and maintains a network of records liaisons responsible for overseeing the program in Headquarters and Field offices in cooperation with the DRO.
4. Serves as the primary Department official who coordinates records management matters with NARA and other oversight agencies.
5. Coordinates the development of a records schedule with NARA, Records Management Branch, program and agency officials. The records schedule identifies records as either temporary or permanent. All records schedules must be approved by NARA.
6. Coordinates matters relating to records management with HUD's Freedom of Information Act (FOIA)/Privacy Act official(s), Records Management Branch, Chief Information Officer (CIO), system administrators, program managers, the Inspector General, General Counsel, Public Affairs Officer, Web Manager, Agency Privacy Officer, and the Imaging and Micrographics Manager, as well as with program officials responsible for other special media, such as audiovisual records, cartographic and architectural records, and printed records.

7. Ensures that recordkeeping requirements are established, implemented, and periodically updated for all offices at all levels and for all record media, including electronic and other special records.
8. Conducts evaluations/reviews of the Department program offices records management programs.
9. Coordinates with the Chief Information Officer (CIO), to ensure that the design and implementation of the Department's information systems incorporate Federal and agency records management requirements.
10. Coordinates with the Chief Information Officer (CIO), to ensure development and coordination of storage protocols and systems for electronically executed (e-sign) documents and digitally executed documents in accordance with federal law.
11. Coordinates with the Chief Information Officer (CIO), to ensure development and/or procurement of a system for executing and storing electronically or digitally endorsed documents including those requiring a digital vault.

#### **F. Primary Organization Heads (POH)**

POHs are managers responsible for major HUD organizations that report directly to the Secretary.

1. Ensures that the office has a designated Records Management Liaison Officer (RMLO), Records Management Coordinator (RMC), and Records Custodian. These individuals will coordinate the office's records management program activities. Programs of HUD have different organizational/management structures. For example, FHA and PIH have much more complex structures due to their size. Departmental records typically work directly with programs to determine the best fit for accomplishing the required regulatory activities.
2. Develops internal written procedures for records management that:
  - a. Comply with Federal and departmental records management policies, to include appropriate records disposition schedules; and
  - b. Inform all personnel of their records management responsibilities.
3. Ensures that all personnel preparing records for archiving are trained to perform this function and are aware of all relevant records disposition schedules and policies.
4. Ensures that the staff receives basic records management training and guidance.
5. Ensures that the staff creates and maintains records documenting the office's program and administrative activities.
6. Works with the Records Custodian to make sure that all the office's records are listed in the office file plan and described accurately in the agency's records schedule.

7. Reviews the office file plan annually.
8. Reminds the staff not to mix personal papers and non-record materials with Federal records, and not to remove records from the office without proper authorization.
9. Implements procedures to prevent departing employees from destroying ineligible records or removing records from HUD's custody.
10. Ensures that the Records Custodian follows the Department's records schedule in carrying out the disposition of the office's records.
11. Cooperates with the Records Custodian, RMLO, and ARO in efforts to promote and evaluate the office's records management activities.

#### **G. Records Management Liaison Officers (RMLOs)**

1. Along with immediate supervisor, coordinates record series inventories, and evaluations of the program office record management policy and Records Coordinators and/or Custodians.
2. Coordinates changes to the records schedule with the ARO and local program managers.
3. Coordinates with the Agency Records Officer to report that each office within the program office has a designated Records Custodian.
4. Ensures that each office creates and maintains records documenting its program and administrative activities.
5. Works with Records Custodians to make sure that all the records of each office are listed in the office file plan and are described accurately in the Department's records schedule.
6. Works with Records Custodians to ensure the transfer of eligible records to a records center, the prompt disposal of temporary records when their retention periods expire, and the timely transfer of permanent records to NARA.
7. Ensures the proper training of Records Custodians and employees and the proper briefing of program and senior managers.
8. Promotes the records management program within the program office.
9. Conducts periodic evaluations of records management activities within the program office.

#### **H. Records Management Coordinators**

A Records Management Coordinator (RMC) will be located in each region. The Regional Support Manager must be notified of the selection. The Coordinators should

be trained in the records disposition management program and goals. RMCs are responsible for:

1. At the Department, assigned responsibilities, within a particular office, for records management matters and compliance with guidance issued by the ARO and RMLO.
2. At their Field offices, coordination of all records disposition activities for their Field offices.
3. Serving as the Field office contact person for records disposition management.

#### **I. Records Custodian**

1. Ensures that all the office's records are listed in the office file plan and are described accurately in the agency's records schedule. Contacts the RMLO or the ARO for assistance.
2. Follows the Department's records schedule to ensure proper disposition of the office's records, including:
  - a. Systematic file cutoffs (breaks).
  - b. Retirement of eligible records to a records center.
  - c. prompt disposal of temporary records when their retention periods expire.
  - d. Timely transfer of permanent records to NARA.
3. Assists the Program Manager in reminding staff not to mix personal papers and non-record materials with Federal records and not to remove records from the office without proper authorization.
4. Assists the Program Manager in implementing procedures to prevent departing employees from destroying ineligible records or removing records from the agency's custody.
5. Cooperates with the RMLO and the ARO in periodic evaluations of the office's records.

#### **J. System Administrator (IT Manager)**

1. Serves as the person responsible for managing an information system.
2. Works with the Records Management Liaison Officers, the Records Custodian, and others to ensure that the design and implementation of the system incorporates Federal and agency records management requirements.

#### **K. Web Manager**

1. Serves as the person primarily responsible for managing the web pages (Internet and

Intranet) within a component (i.e., ensuring compliance with agency and local directives) but usually not the person responsible for content of a web page.

2. Works with the Records Management Liaison Officers, the Records Custodian(s), and others to ensure that the web page managers understand and adhere to Federal and agency recordkeeping requirements.

#### **L. Inspector General**

1. Serves as the official responsible for monitoring agency programs and operations to prevent and reduce fraud, waste, and abuse to improve agency operations, management, efficiency, public service, and mission fulfillment.
2. Coordinates with the ARO and others regarding any recordkeeping deficiencies identified during inspections and investigations.

#### **M. General Counsel**

1. Serves as the official responsible for providing legal advice and assistance to HUD officials and employees.
2. Provides advice to the ARO and others regarding the legal value of the HUD's records and the issue of public access to them.

#### **N. Public Affairs Officer**

1. Serves as the official responsible for coordinating information being released to the public, such as news releases, speeches by high-level officials, media presentations, appearances of departmental representatives at public events, etc. The Public Affairs Officer may be responsible for coordinating content of public websites.
2. Works with the RMLO to ensure that release of information complies with Federal and departmental public affairs directives.

#### **O. All HUD Employees/Contractors**

1. Treat records in their custody as Government property. Identify and keep their personal correspondence and documents separate.
2. Notify their RMLO, or DRO when automated files are involved, of any actual or threatened unlawful removal or destruction of records.
3. Keep their reference and other non-record material to a minimum and dispose of it as soon as it becomes obsolete or unnecessary.
4. Recommend needed schedule changes in writing through proper channels to their RMLO or ARO.