

CHAPTER 6: RECORDS AND INFORMATION MANAGEMENT TRAINING

6.1 Purpose

To ensure that the Department's records management program remains viable and effective, all HUD employees must be aware of the program and have adequate training to perform records and information management duties as required.

6.2 Formal Training

Records management training courses and Federal records management certification are available from the NARA Office of Records Services, Agency Services Staff. NARA's Office of Regional Services also offers online training opportunities and supports agencies in the development of agency specific training materials.

6.3 Role-Based Training

In July 2016, OMB issued revised Circular No. A-130, establishing policy for the management of Federal information resources and, specifically, requiring the implementation of records management training and guidance for agencies, NARA Bulletin 2017-01.

This Bulletin provides the minimum requirements for agency records management training programs. The Bulletin identifies who must take records management training and how often this training must be provided. It also describes promising practices for the development and administration of training. This Bulletin supplements the general training requirements outlined in 36 CFR 1220.34; to wit:

- A. Audience: All agency personnel, which includes Federal employees, contractors, volunteers, and others that create, receive, access, or use Federal records on behalf of the agency, must receive records training;
- B. Timing: All agency personnel with email accounts or IT network resource access must complete records management training within 60 days of employment and must complete annual refresher training;
- C. Comprehensive: Agencies must provide records management training to all agency personnel that create, receive, access, or use Federal records on behalf of the agency, regardless of whether those individuals have email accounts or IT network access;
- D. Agency-Specific Training: Agencies must develop records management training content specific to the practices and policies of the organization;
- E. Content: Agencies must incorporate the following minimum required content areas into annual records management training:

1. Define Federal records.

2. Describe how records management supports the agency's mission and business processes, and public access to Government information
3. Provide an overview of government-wide and agency-specific records management policies and recordkeeping requirements.
4. Explain legal responsibilities for creation, maintenance, and disposition of Federal records.
5. Describe the stages of the records management lifecycle, to include the creation, maintenance and use, disposition, and the difference between temporary and permanent records, all of which are addressed in the agency's disposition schedule.
6. Describe how records are maintained and filed in the agency, including:
 - a. What is a records schedule, its legal authority, and where to find their agency's schedules;
 - b. Why it is important to follow records schedules or file plans; and
 - c. How records schedules or files plans are implemented and updated.
- F. Explain how legal holds (sometimes called records freezes) and the discovery phase of litigation affect records handling, retention, and disposition;
- G. Describe how and where to store agency Federal records;
- H. Describe how agency information technology (IT) systems are used for records management (if applicable, how to use agency records management technologies);
- I. Describe how to manage record and non-record materials in email, social media, and other electronic messages, including the statutory requirement that all emails and other electronic messages constituting a record that are sent or received using a personal or non-official account must be copied or forwarded into agency recordkeeping systems within 20 days of creation or receipt;
- J. Describe what to do with record and non-record materials when an employee leaves the agency;
- K. Describe what to do when records are removed, lost, or destroyed without proper authorization;
- L. Describe where to get more information about records management (e.g., websites, manuals, agency's records schedule, file plans, and agency Records Officer contact information); and
- M. Provide agency contacts for records management questions. Include information for the Field and/or Headquarters points of contact for retiring records to storage, transferring permanent records, destruction of records, and answering records management questions.

N. Agencies must offer records management training specific to the needs of the following groups:

1. Senior level agency officials and political appointees;
2. Records professionals at all levels within the organization;
3. Managers and supervisors;
4. Acquisition, contracting, and procurement personnel;
5. Attorneys engaged in litigation or advising on records or access to information issues;
6. Personnel developing and managing IT systems and applications; and
7. Continuity of Operations and Disaster Preparedness personnel that manage mission essential records.

Agencies must provide targeted records management training to political appointees, senior agency officials, and senior executives upon their arrival and departure, and within 3 to 6 months prior to a presidential administration change. This may include conducting entry and exit interviews with your agency's records management staff, IT liaisons, and General Counsel to ensure that records are preserved and protected.

Agency records management staff should coordinate with learning and development professionals to assist with the design, development, and tracking of training. Agencies should design training so that individuals apply what they are learning during training. Agencies are also encouraged to develop assessments to verify that trainees have learned the content.

6.4 Publicizing the Records Management Program

In addition to training courses and orientation sessions, other means of publicizing the program and reminding employees of their records management responsibilities should be employed. Some of the approaches include:

A. Website: Each program office may create a Records Management website that serves as the primary resource for the program office records policies and guidance.

B. Memoranda: At least annually, program office heads may issue a memorandum reminding all employees of their records management responsibilities.

C. NARA Bulletins: Disseminate NARA bulletins or the information contained therein to program/office employees as deemed necessary. This task will be carried out by the Records and Information Management program staff.