

CHAPTER 8: RECORDS MANAGEMENT EVALUATIONS

8.1 Purpose and Scope of Records Management Evaluations

A. The purpose of this chapter is to provide guidance regarding a process to conduct annual evaluations of the Department records management program, as well as reviews of records schedules. The requirement for records management reviews and evaluations is contained in 36 CFR 1220.34, Records Management Responsibilities. This guidance is a tool to be used by the Agency Records Officer (ARO) and can be supplemented by more specific guidance. Program office Agency Records Officers (ARO) are responsible for administering the Department's records management programs. Their responsibilities also include, as requested, reporting to the Electronic Records Management Division on the status, or particular aspects of, their respective program office.

B. The Electronic Records Management Division (Departmental Records) will conduct formal evaluations to measure the effectiveness of records management programs and practices and to ensure that they comply with the NARA regulations in Chapter XII. The evaluations occur at the departmental, program, and office level annually. These evaluations are mandated by 36 CFR 1220.34. The evaluations conducted are detailed in HUD Form 681, HUD Records Management Assessment.

C. In order to fulfill their responsibilities, RMLOs may conduct regular content analysis consisting of records analysis, risk analysis, and retention analysis of their program office to monitor compliance and report on program effectiveness. This content analysis is primarily completed through the completion of HUD 67 Record Series Inventory Worksheets, and review of Privacy Impact Assessments in conjunction with the program Privacy program. The reviews will assist RMLOs to preliminarily assess the status of their records management program, identify major problems, and set priorities for program improvements.

8.2 Notification of Evaluations

The Electronic Records Management Division will notify program areas of Evaluation dates based on an annual schedule, a specific request by the program official, or a compliance monitoring cycle, e.g., triennial review. Program officials may request a review of their records management program by contacting the ARO. At least 30 workdays before initiating the review of a program area, the ERMD will notify the program official in writing of the review and its scope. Upon notification by the ERMD, the program official will:

8.3 Disposition Plan (Evaluation Report)

Within 15 workdays of the review or exit briefing, the ERMD will submit to the program

official a draft Disposition Plan for factual review and comment. After receiving the program official's comments, the RMLO will finalize the report by correcting any factual errors identified by the program official.

8.4 Disposition Plan (Progress Reports)

A. **Disposition Plans**. Within 30 workdays of the date of transmittal of the final Disposition Plan (Evaluation Report), the RMLO will submit an action plan to the Electronic Records Management Division (Departmental Records Management). The action plan will include:

1. The program official's name/office responsible for coordinating the review.
2. The specific action(s) the program will take to implement each Disposition Plan recommendation. If the program is unable to implement a recommendation, the rationale for not acting shall be documented.
3. The program official's name and the office or program responsible for the overall coordination of the Department's follow-up actions.
4. The estimated time needed to complete each action and the proposed quarter and year for starting and completing each action.

B. **Progress Reports**. Every quarter, the RMLO will submit progress reports to the Electronic Records Management Division.

1. Report Contents. The reports will include:
2. A description of the progress made on each action since the last progress report.
3. The current action status.
4. Any changes in the offices or programs responsible for overall or specific action implementation.
5. If applicable, explanation of any delays in implementation or any revised target dates or milestones for completion of the action.

8.5 Follow-Up Notification and Reviews

The Records Management Liaison Officer will notify the ARO if the ARO determines that there is not substantial progress in the full implementation of Disposition Plan recommendations or that the program office has not corrected serious problems identified in the Disposition Plan.