



# HUD Guidance for the Transition to Electronic Records

## Process, Steps, and Points of Contact



How do you migrate to using  
Electronic Records?



When and how do you get  
documents digitized?



## INTRODUCTION

This guidebook is designed to enhance the efficiency of the Triage efforts and ensure that the quality of records and information management meets intended uses. It will quickly explain, the methods, processes, authorities, and support tools currently in place to help you meet the requirements of OMB Memo M-19-21 Transition to Electronic Records.

### Authority

- National Archives and Records Administration (NARA)/Office of Management and Budget (OMB) Memorandum, M-19-21: Transition to Electronic Records, June 8, 2019
- OMB Circular No. A-130: Management of Federal Information Resources
- 36 CFR 1236, Electronics Records Management



## ONE PAGER (AND REPEAT IN BACKUP DOCUMENT)

### Steps to Complete:

1. Conduct an inventory of your records holdings. (Appendix C-HUD Form 67)
2. Assess the nature of the content.
  - a. Record vs Non-Record
  - b. Paper vs. Electronic
3. Review File Plan to determine appropriate retention requirements.
  - a. Contact your program office RMLO (Appendix A-RMLO List) or Stephanie Stokes in the departmental records office.
4. Categorize records based on what the business needs are. (Appendix B-Decision Tree)
  - a. Transfer → Contact Admin to Send to Federal Records Center.
  - b. Shred → Contact Admin to facilitate Shredding.
  - c. Scan → Contact Admin to send records to Weaver for scanning.
5. Destroy expired records and non-record content (Appendix D-HUD Form 1067)



## CLEAN-UP PAPER VS ELECTRONIC

### Paper

Program Offices at Headquarters and in the Field are directed to face the task of deciding which of their records should be retained, which should be retired, and which should be recycled/disposed. Keep the following guidelines in mind when reviewing your office records:

1. Retain only those records required to conduct current Agency business.
2. Retire all inactive records that are eligible as indicated in the applicable HUD Agency Specific Schedule or General Records Schedule (GRS).
3. Recycle or dispose of all records that have exceeded their retention period as indicated in the applicable records schedule.
4. Recycle or dispose of any personal papers, technical reference materials, and other non-records items that are no longer needed.

Actions taken regarding federal records after they are no longer needed in the program office to conduct agency business.

1. Transfer temporary records to the Federal Records Center
2. Transfer permanent records to the National Archives.
3. Disposal of temporary records by destruction

### Electronic

Program Offices at Headquarters and in the Field are directed to:

- Use the digitization standard for capture of hard copy documents and records in information content repositories or other designated storage environments, where use does not jeopardize existing standard business practices; and
- Incorporate the digitization standard into documented standard operating procedures (SOP) to ensure consistency across Housing and establish the framework for legally defensible standard business practices for digitization. For addition digitization SOP, please refer to the Digitizing Temporary Federal Records.

# SHARED DRIVE MIGRATION TO SHAREPOINT

Procedures	Actions/Decisions
1. Identify shared drive recordkeeping requirements	1. Obtain agency records schedule.
	2. Obtain and review organizational file plan.
	3. Work with the ARO to identify and review privacy and security requirements.
	4. Work with the ARO to identify whether this is a recordkeeping system or a reference tool.
	5. If the shared drive is a recordkeeping system, then move to subtask 2.
	6. If the shared drive is not a recordkeeping system, then see instructions that come out of step 3.1.
2. Describe the current stat of the shared drive.	<p>1. Ask IT to provide information on the shared drive. Information such as:</p> <ul style="list-style-type: none"> <li>■ All drive names used by or assigned to the unit, including drives that may have been abandoned over time.</li> <li>■ Data volume, number of files, file names and owners, including offline, near-line, replicated servers and backups for each drive used by the unit.</li> <li>■ Estimate of the annual growth of volume based on size and dates of files for the last five years.</li> </ul>
	2. Create a spreadsheet from the data provided by IT that shows the location of all information and records the unit has, identifying volumes of data, number of files, with their names and owners, and locations, including offline, near-line, replicated servers and backups.
	3. If there are still questions about the current state of the shared drive, then set up meetings with end-users to get clarification.

- |  |  |
|--|--|
|  | <p>4. Organize a meeting with end-users to determine the following:</p> <ul style="list-style-type: none"><li>■ Whether each folder aligns with the business functions and/or the records retention schedules of the unit.</li><li>■ How folders and subfolders are currently named. Is it by function, personal name of owner, fiscal year, or some other method?</li><li>■ Whether or not case/project folders are structured in the same way and whether or not files in case/project folders are organized into subfolders.</li><li>■ Whether or not there are folders and/or subfolders that are adequate to transfer as-is to a new folder structure? (In other words, do they match a business function and/or a records schedule?)</li><li>■ Identify any possible restrictions and/or permissions</li></ul> |
|  | <p>5. Add this information to the spreadsheet mentioned above.</p>   |

<p>3. Describe the new shared drive model.</p>	<ol style="list-style-type: none"> <li>1. Create a shared drive task force to work on and/or develop the following: <ul style="list-style-type: none"> <li>■ How to manage drafts and working files.</li> <li>■ How to manage non records and personal files.</li> <li>■ If necessary, update the file plan.</li> <li>■ Use current file plan to develop an organizational structure for the files.</li> <li>■ Apply relevant records schedules including GRS and agency schedules.</li> <li>■ Establish naming conventions.</li> <li>■ Decide whether existing records must be renamed according to the new naming convention, or whether use of the naming convention will be day-forward only.</li> <li>■ Create a crosswalk from the old structure to the new one.</li> <li>■ Develop business rules such as: <ul style="list-style-type: none"> <li>❑ an agreed-on set of acronyms</li> <li>❑ duplication of folder names</li> <li>❑ records may be saved to the shared drive</li> <li>❑ separate records from drafts and other working documents</li> <li>❑ limiting access to restricted records (in support of the draft access restriction schema)</li> <li>❑ path names must be shorter than 255 characters or less</li> <li>❑ closed or inactive files be moved to folders designated for disposition</li> </ul> </li> </ul> </li> </ol> <p>Decide who will perform such tasks as deleting and/or moving non-records, moving files to the new structure.</p>
	<ol style="list-style-type: none"> <li>2. Document these decisions in a planning document/project plan.</li> </ol>
	<ol style="list-style-type: none"> <li>3. Create a list of implementation steps.</li> </ol>
	<ol style="list-style-type: none"> <li>4. Circulate draft plan to stakeholders for review.</li> </ol>
	<ol style="list-style-type: none"> <li>5. Edit draft plan.</li> </ol>

	6. Submit draft plan to management for review
4. Build the new shared drive model.	1. Obtain the final plan and any supporting materials
	2. Use the information in the plan on the shared drive structure and naming conventions to set up the files in the shared drive.
	3. Use the information in the plan to write policies and procedures for implementation (e.g., naming conventions, managing drafts, cutoff instructions).
5. Test the new shared drive model.	1. Ask the shared drive task force to test the new shared drive.
	2. Identify and create a series of test cases for testing.
	3. Create test version of the shared drive structure.
	4. Create a feedback tool for testers to use.
	5. Send the link to the location of the shared drive test site, policies and procedures, test cases, and feedback tool to the shared drive task force for testing.
	6. Meet with the shared drive task force to get overall feedback on their experience.
	7. Obtain and review the feedback received via the feedback tool.
	8. Edit the policies and procedures and make changes to the folder structure based on feedback.
	9. Send revised policies and procedures to program management and stakeholders for review and comment.
	10. Revise policies and procedures based on comments from program management and stakeholders.
	11. Send revised policies, procedures, and folder structure to the ARO for review and approval



6. Kickoff.	1. Create live version of the shared drive structure.
	2. Compile the new policies and procedures and folder structure.
	3. Set up a kick-off meeting with staff

Procedures	Actions/Decisions
	1. Creating training material and job aids
	2. Send the policies, procedures, and training material to staff.
	3. Host a kick-off meeting
1. Disposition	1. Organize training for the Records Custodians to prepare for the end of the FY or calendar year records cleanup day.
	2. Notify the Records Custodians about the end of year records cleanup day. Include pointers to or attach the file plan and/or records schedule.
	3. Ask the Custodians to make sure records are not covered by a litigation hold. If they are unsure, then they will ask the RLO.
	4. For the records not covered by a litigation hold, then ask the Records Custodian to consult the records schedule or file plan to identify the correct disposition authority, make sure the records are temporary (disposable), determine when and how the records were closed, and determine how long they are retained after closure.
	5. If any of the closed records are temporary and eligible for disposal, then ask the Custodian to complete the destruction form for each series located on the Records Management website, then send it to the records owner or the person who has the authority to authorize destruction, and then to the RLO for final review.

Procedures	Actions/Decisions
	1. If you approve the destruction, then instruct the Custodian to delete the records on the shared drive.
	2. If you disapprove of the destruction, then get back to the Custodian to explain why.
	3. If any of the closed records are permanent, then ask the Custodian to send you a detailed folder level list of what is eligible to be transferred to the National Archives.
	4. Review the folder list and compare it with the agency records schedule.
	5. Notify your NARA Electronic Records Archivist of the proposed transfer of permanent records.
	6. If you have an ERA account, then create a TR in ERA and attach the folder level content list(s).
	7. If you do not have an ERA account, then contact the ARO or the ERA account holder and request that a TR be created. Forward to the ARO or ERA account holder via email all information necessary to complete the TR.
	8. Transfer the records and any documentation to the National Archives via the agreed upon method, upon approval of the TR.
	9. Ask the Records Custodian to send you a list of the folders/files that need to be moved forward to the next FY or calendar year.
	10. Create the new FY/calendar year folders
	11. Moved the active files/folders forward to the new FY/calendar year folders
	12. Label the closed files/folder in the previous year's files.
	13. Notify the Records Custodians that they can begin filing in the files/folders.

## APPENDIX

### Records Management Liaison Officers

Office	RMLO	Email Address
Secretary & Deputy Sec	Vacant	@hud.gov
Office of Hearings and Appeals	Iamanadette Jones	Iamanadette.T.Jones@hud.gov
Field Policy & Mgmt.	Marcelline Yearwood Sarah Lyke	Marcelline.Yearwood@hud.gov sarah.m.lyke@hud.gov
Public Affairs	Vacant	@hud.gov
Community Planning & Development	Urnell Johnson	Urnell.Johnson@hud.gov
General Counsel	Steve Wagstaff	Steven.Wagstaff@hud.gov
Congressional & Intergovtl Relations	Vacant	@hud.gov
Government National Mortgage Association	Lynette Warren Dion Milhouse	Lynette.Warren@hud.gov
Housing	Angelia Butler Isaac Livingston	Angelia.L.Butler@hud.gov
Fair Housing & Equal Opportunity	Desta Wouden Patrina Munson	Desta.D.Woudehn@hud.gov Patrina.Munson@hud.gov
Office of Department Equal Employment Opportunity	Eddie Ginn	Eddie.J.Ginn@hud.gov
Policy Development & Research	Mariama Tarawally	Mariama.Tarawally@hud.gov

Inspector General	Cheryl Stadel-Bevans	CStadelBevans@hudoig.gov
Public & Indian Housing	Daniella Mungo Tamebra Treadwell	Daniella.D.Mungo@hud.gov Tamebra.F.Treadwell@hud.gov
OCHCO	Zita Walker Charles Butler	Zita.R.Walker@hud.gov Charles.S.Butler@hud.gov
Office of Healthy Homes and Lead Hazard Control	Jeffrey Simpkins Marquis Wade	Jeffrey.W.Simpkins@hud.gov Marquis.C.Wade@hud.gov
Chief Procurement Officer	Lawrence Chambers Antonia Aikens	Lawrence.E.Chambers@hud.gov Antonia.D.Aikens@hud.gov
Chief Financial Officer	Lois McCain	Lois.D.McCain@hud.gov
Chief Information Officer	Gloria Moses	Gloria.A.Moses@hud.gov
Office of Administration	Kim Adams Laura Moore	Kim.C.Adams@hud.gov Laura.E.Moore@hud.gov

	Regional /Field Office POC	Contact Name	Phone
Region I	Boston Regional Office	Mary Bucci	617-994-8295
Region II	New York Regional Office	Sheila Nicholson-Johnson	212.542.7341
Region III	Pennsylvania Regional Office	Tomyko Levi	678-732-2372
Region IV	Atlanta Regional Office	Sophina Lane	678.732.2487
	Birmingham, AL	Gale Harris	205.745-3405
Region V	Illinois Regional Office	Vanessa Thomas	312-913-8528
Region VI	Texas Regional Office	Daryle Harris	817-978-5850
Region VII	Kansas, MO Regional Office	Vettra Williams	913.551.5454
Region VIII	Colorado Regional Office	Robert Mocon	303.672.5224
Region IX	California Regional Office	Karol Parber	415.489.6716
Region X	Seattle Regional Office	Nick Oberle	206.220.6422

# TRIAGE DECISION TREE

## HUD Form 67

<https://www.hud.gov/sites/dfiles/OCHCO/documents/67.pdf>

### RECORDS INVENTORY WORKSHEET

Department of Housing and Urban Development

1. Program Office	2. Office/Division/Branch	3. LOCATION OF RECORDS/URL
4. NAME AND TITLE OF MANAGER RESPONSIBLE FOR MAINTAINING RECORDS		

#### RECORDS SERIES IDENTIFICATION

5. CURRENT RECORDS SERIES TITLE OR ELECTRONIC APPLICATION CURRENT NAME (INCLUDING ACRONYM IF APPROPRIATE)			
6. DESCRIPTION INCLUDE ANY OF THE FOLLOWING - PURPOSE OF THESE RECORDS			
7. RECORD MEDIUM (SPECIFY) PAPER ELECTRONIC MAPS/DRAWINGS	8. ARRANGEMENT ALPHABETICAL NUMERICAL CHRONOLOGICAL	9. SUBJECT NUMBER	10. STORAGE/VOLUME
11. RECORDS DATE FROM TO		12. RETENTION PERIOD (SEE 42 CFR 200.10) SCHEMATIC INFORMATION (P) LEGAL LITIGATION FINANCIAL INFORMATION PROPERTY INFORMATION OTHER INFORMATION CRITICAL INFRASTRUCTURE PUBLIC SAFETY ENVIRONMENTAL ARCHIVAL	
13. INFORMATION TO BE MAINTAINED FOR RECORDS INVENTORY a. ACTIVE (ARCHIVED OR DELETED) b. INACTIVE (ARCHIVED OR DELETED) c. CURRENT		14. ESTIMATED ACCESS ACTIVITY HIGH (Daily) MEDIUM (Weekly to Monthly) LOW (Less Than Once a Month)	
15. STATE THE DATE SPECIFICALLY FOR ELECTRONIC RECORDS FOR THIS RECORD SERIES? EXAMPLES ARE FOLLOWS (INCLUDE FORM NUMBER, SPREADSHEET, LETTERS, ETC.)			
16. WHEN THIS INFORMATION IS CHANGED FOR EXAMPLE, UPDATING AN ADDRESS, VERSION, PRICE, ETC. IS A COPY OF THE CHANGED DATA REPORT?			
17. IF SO, NUMBER IS THAT COPY STORED?			
18. INFORMATION MAINTAINED FOR MORE THAN ONE MEDIUM OR DUPLICATED (EXPLAIN)			
19. NAME OF PERSON TAKING INVENTORY			
20. DATE OF INVENTORY			
FOR USE OF RECORDS MANAGEMENT LIAISON OFFICER			
21. RECORDS SERIES SCHEDULE		22. RECORDS SERIES FROM NUMBER	
23. RECORDS RETENTION INSTRUCTIONS		24. DISPOSITION AUTHORITY NUMBER	

**SHEET FOR EACH RECORDS SERIES** - Records series is a group under a single filing system or kept together as a unit because they have or document the same transaction, and which, because of any of their retention and disposition purposes. A records series is not defined by chronological, numerical, or alphabetical filing.

**IO, Lead Hazard**  
To the manager responsible for maintaining the records. For a case of electronic records, list the path or directory.

If the records series has one, a general description of the series that are used to refer to that particular records series.

If the records series is maintained, how a records series is arranged, set, and so on. The current retention period (both in the office and for future dates of the records so that consideration may be given to any duplicate or non-reproducible information is located (Tables 10 and 20).

For example, "Duplicate of Air Quality Inspection Reports is used a non-recent copy. A significant consideration in the analysis of a official record copy, which must be retained for the full retention period as in a particular department may show that it is the official record copy may be convenience copies of the same records in other departments of the field with a records management program can save money, as they are no longer needed, especially if they are normally maintained in.

If be located in more than one department, but one set of the records should may have the record copy with a second department in a copy that needs to be maintained for the full retention period. To be able, convenience copies may not be retained any longer than the.

Previous versions obsolete

2 of 2

HUD Form 67 (02/2021)

## HUD Form 1067

<https://www.hud.gov/sites/dfiles/OCHCO/documents/1067A.pdf>

### CERTIFICATE OF SANITIZATION

Department of Housing and Urban Development

1. Program Office	2. Office/Division/Branch	3. LOCATION OF RECORDS/URL
4. NAME AND TITLE OF MANAGER RESPONSIBLE FOR MAINTAINING RECORDS		

CERTIFICATE OF SANITIZATION		
PERSON PERFORMING SANITIZATION		
Name:	Title:	
Organization:	Location:	Email:
MEDIA INFORMATION		
Make/ Vendor:	Model Number:	
Serial Number:	Media Property Number:	
Media Type:	Source (ie user name or PC property number):	
Classification:	Date Backed Up:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
Backup Location:		
SANITIZATION DETAILS		
Method Type:	<input type="checkbox"/> Clear <input type="checkbox"/> Purge <input type="checkbox"/> Damage <input type="checkbox"/> Destroy	
Method Used:	<input type="checkbox"/> Degauss <input type="checkbox"/> Overwrite <input type="checkbox"/> Block Erase <input type="checkbox"/> Crypto Erase <input type="checkbox"/> Other:	
Method Details:		
Tool Used (include version):		
Verification Method:	<input type="checkbox"/> Full <input type="checkbox"/> Quick Sampling <input type="checkbox"/> Other:	
Post Sanitization Classification:		
Notes:		
MEDIA DESTINATION		
<input type="checkbox"/> Internal Reuse <input type="checkbox"/> External Reuse <input type="checkbox"/> Recycling Facility <input type="checkbox"/> Manufacturer <input type="checkbox"/> Other (specify in details area)		
Details:		
SIGNATURE (System Owner)		
I attest that the information provided on this statement is accurate to the best of my knowledge.		
Signature:		
VALIDATION		
Name:	Title:	Records Officer
Signature:		
Name:	Title:	Privacy Officer (or other)
Signature:		

form HUD-1067A  
(04/2021)



## FREQUENTLY ASKED QUESTIONS (FAQ)

### WHAT IS REQUIRED?

#### How do we get started?

Contact Admin and/or your program RMLO

#### How long does it take to scan?

Scanning could take several weeks. We can coordinate the shipment of boxes to reduce the amount of time that information is not accessible.

#### How long does it take to retrieve?

In the event of an unanticipated request, a particular set of boxes could be pushed to the head of the queue to provide a 2-3 day response, similar to records retention

#### How do we destroy our records?

Records need to be shredded, and if they contain PII (or other CUI) they should be shredded at the stipulated times listed in your schedules and/or file plans.

#### What if we don't have any records?






You have records. You may not realize it, but any documenting of the work you perform constitute a record.

#### Will there be Online Training?

Training is being developed and will be uploaded to HUD Learn. In the interim, please contact your program RMLO or local Admin Support Specialist.

# IS IT A RECORD?

## RECORDED INFORMATION

RECORD	YES ←	Are you or your organization the creator of the record? Did you generate or receive the information to use for your technical/administrative work in conducting agency business?	
		NO ↓	
RECORD	YES ←	Does it contain informational value as evidence of your organization's functions, policies, decisions, procedures, operations, mission, programs, projects or activities?	
		NO ↓	
RECORD	YES ←	Is it material that originated in another office or outside your agency, but you commented or took action on the material?	
		NO ↓	
RECORD	YES ←	Does it document business actions, such as: what happened, what was decided, what advice was given, who was involved, when it happened, the order of events and decisions?	
		NO ↓	
RECORD	YES ←	Is it an original document related to agency business that does not exist elsewhere?	
		NO ↓	
		Is it a draft or interim document that has not been circulated to others or does not contain substantive comments and for which there is a final version being maintained?	YES → 
		NO ↓	
		Is it published or processed information that you received and use as reference?	YES → 
		NO ↓	
		Is it a copy of a document or correspondence kept only for convenience of reference on which no action is taken?	YES → 
		NO ↓	
		Is it information accumulated and maintained at the workplace, but which does not affect or reflect the transaction of your program business?	YES → 
		NO ↓	
		Is it junk mail or documentation that has not work-related informational or evidentiary value?	YES → 



**WHEN IN DOUBT, TREAT IT AS A RECORD.**

Call your Records Officer for information.



# RECORDS: Steps to Complete

## Inventory

1

Conduct an inventory of your records holdings.  
(Appendix C-HUD Form 67)

## Assess

2

Assess the nature of the content

- Record vs Non-Record
- Paper vs. Electronic

## Review

3

Review File Plan to determine appropriate retention requirements.




- Contact your program office RMLO (Appendix A-RMLO List) or Stephanie Stokes in the departmental records office.

## Categorize

4

Categorize records (Appendix B-Decision Tree)

### Contact Admin:

- Transfer  to Send to Federal Records Center.
- Shred  to facilitate Shredding.
- Scan  to send records to HQ for scanning.

## Destroy

5

Destroy expired records and non-record content  
(Appendix D-HUD Form 1067)

