



DEPARTMENT OF THE ARMY
ADMINISTRATIVE ASSISTANT TO THE SECRETARY OF THE ARMY
105 ARMY PENTAGON
WASHINGTON DC 20310-0105

OCT 24 2005

JDRP-RDR-R

MEMORANDUM FOR Department of the Army Base Realignment and Closure Office
(DAIM-BD) 600 Army Pentagon, Washington, DC 20310-0600

SUBJECT: Recordkeeping Requirements during a Base Realignment and Closure
(BRAC) Action

1. The purpose of this memorandum is to provide recordkeeping guidance to agencies affected by BRAC actions. Please pass on this information to all subordinate agencies under your area of control.
2. Attached is an information paper that provides Army policy, general guidance and options for addressing the disposition of agency records during a BRAC action.
3. Questions can be addressed to Mr. Michael Short, (703) 428-6298 or via email at michael.short@rmda.belvoir.army.mil.

Encl


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SUBJECT: Recordkeeping Requirements during a Base Realignment and Closure (BRAC) Action

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INFORMATION PAPER

JDRP-RDR-R

04 Oct 2005

SUBJECT: Recordkeeping Requirements During Base Realignment and Closure (BRAC) Actions

1. **PURPOSE.** Provide information on the disposition of agency and/or installation records during a BRAC. This information is intended as guidance for preparation of the Information Technology Action Plan and other Action Plans where transfer or disposition of Federal records is involved.
2. **BACKGROUND.** AR 25-400-2, Army Record Information Management System (ARIMS), paragraph 9-4, Supplemental data when organizational status has changed, is the basic policy on dealing with record information in the case of a change of status of an organization (e.g. a BRAC closure). However, there are a number of factors that should be considered and implemented to prevent the loss or premature destruction of Army record material.
3. **CONSIDERATIONS:**
 - a. Records must be identified and organized IAW AR 25-400-2 (i.e.the Army's disposition schedule). It is critical that this is done to assist in the organization and disposition of the agency's or installation's records. RMDA recommends that all action plans direct an inventory of records by series, media and volume. The required Office Records List (ORL) is essential in creating this inventory of records. The information will be used to determine the disposition of the records and to approximate shipping or conversion costs. For agencies/installations affected by the BRAC the time to do this is NOW.
 - b. Official records should be organized, labeled and boxed IAW AR 25-400-2 and National Archives and Records Administration (NARA) guidelines. If done correctly, this will only have to be done once. Proper organization, labeling, and packing of record material ensures easy retrieval of the records if needed, provides for an audit trail and allows for the smooth transfer of these records to the gaining installation, or a Federal Records Center (FRC). NARA will not accept records into an FRC unless the procedures for transferring records are precisely followed.
 - c. Records take up space, in some cases considerable space, when hard copy records are involved. Planning must be done to include the necessary resources to review, organize, pack and transfer (or destroy) the records in question. Transferring the records also requires considerable coordination with the gaining agency/installation whether that is an Army records holding area or

an FRC. A proper inventory as described above will be needed to successfully accomplish this planning and coordination.

d. Non-record material should be purged. Duplicates of official records, reference materials, personal items or any other non-record material should be removed from the volume of records to be transferred.

e. Official records held by action officers (AOs) should be removed from their desks and placed with the official centralized files. Records do not belong to an individual, but to the agency for which he/she works. It is almost impossible to go in "after the fact" and try to identify official records when the contents of an individual's desk is thrown in a box and packed up.

f. As the "owner" of the records, an agency is responsible for them regardless of where they are located until their approved destruction or transfer to the custody of the National Archives (permanent records only). In the case where an agency is disbanded, the records become the responsibility of the next higher headquarters that the former agency belonged to.

g. Principal HQDA officials for the functional areas (logistic, personnel, medical, operations, etc.) should also provide guidance on what to do with records created by functional business processes. In most cases, a functional area has (or should have) specific guidance or procedures detailing the management of the record information from creation through the final disposition.

4. OPTIONS:

a. Electronic Records. Electronic records will be identified and organized IAW AR 25-400-2. This includes e-mail messages which can also be Army records. The agency should ensure electronic records on hard drives, network servers, and other storage media are identified under the organization's ORL and transferred IAW the disposition schedule. Short term records will be kept on current electronic systems through their life cycle, while the long term records should be transferred to the Army Electronic Archive (AEA). Short term e-records should be moved with the agency that moves. In the case where agencies/installations become "inactive" or close, the short term e-record data should be forwarded to the next higher headquarters, which becomes responsible for the records through their lifecycle. For example, the Regional Installation Management Agency (IMA) office would be responsible for the "non-tenant" records of a closing installation in their region (tenant agency records would follow the guidelines outlined in para 9-4 of AR 25-400-2). Transferring long term records to ARIMS Army electronic archive (AEA) can be done three ways...via the Electronic Capture and Store (ECS) applet; using the "backfile conversion" capability in the ARIMS Records Input Processing System (RIPS) module or via a middleware solution. Using the middleware solution requires an MOA with RMDA.

b. Early retirement of records to an FRC.

(1) Requires a waiver from RMDA. The request to retire records early must include the volume (# of records boxes/cubic feet), record numbers involved, creation date of the records in question and the disposition date of the records. The request must also include a justification for the need to retire the records early.

(2) If a waiver is granted, the agency should annotate on the SF 135 that the records are being retired under a base closure action. Also, if the records in question fall under one of the records freezes currently in place, the appropriate freeze code should also be annotated on the SF 135.

c. Early disposal of records. An agency can request authorization for the early disposal of some short term records. This request must be approved through RMDA. The request to destroy records early must include the volume (# of records boxes/cubic feet), record numbers involved, creation date of the records in question and the disposition date of the records. The request must also include a justification for the need to destroy the records early and a certification that the records do not fall under any of the records freezes. All current records freeze information can be found on AKO under Army Records Management/Recordkeeping/Records Freezes.

d. Document imaging. Some agencies or installations may consider document imaging as a way to decrease shipping/storage costs of hardcopy records. Document imaging can be either filming (microfiche, microfilm) or scanning into a digital format for electronic storage. Although viable options, there are a number of items to consider before taking on a project such as this.

(1) Cost. Most electronic imaging systems are used primarily for the storage and quick retrieval of "active" documents. A return on investment for equipment, training, maintenance, etc. comes over time and from the efficient use of the system to perform a certain function. Incurring this cost to store records is usually not cost effective - especially if they are short term records. For long term records, the system would have to allow for indexing capabilities so that the records can be located and retrieved. Indexing the material (IAW AR 25-400-2) is labor intensive and increases the cost of this option.

(2) Quality Control. Whether using electronic imaging or microfilming processes, it is important to have a robust quality control process in place. The organization must ensure that the records are captured correctly and that the necessary indexing is done. A number of standards must be followed for imaging permanent records (see NARA website)

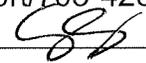
(3) Destruction of the source documents. Source documents which are permanent records cannot be destroyed without specific approval from NARA. A request to authorize destruction of permanent records must be forwarded through RMDA and requires not only the specifics on the records, but also the system that will store the electronic version of the records. In addition, records affected by a litigation freeze may not be destroyed without authorization by the Army Litigation Center.

5. BRAC GENERATED RECORDS. Besides an agency's records already on hand, a BRAC situation will result in the creation of additional records relating directly to the BRAC action. Most of these types of records are long-term and/or permanent records that relate to planning, reorganization, change in functions and/or manpower, changes to installations, etc. A starting point would be record numbers 5-10c1, 2 and 3, Reduction and Realignment Documentation and record numbers 10-5a1 and 2, Organization Plans. Also, a search on "BRAC" in the ARIMS system will result in a "hit list" of 29 record numbers. This list contains records under the following record categories:

- a. Construction
- b. Corps of Engineers
- c. Engineering and Design
- d. Environmental Quality
- e. Financial Administration
- f. Procurement
- g. Real Estate
- h. Safety

6. ADDITIONAL INFO. Any agency that is facing a BRAC situation should first notify their MACOM Records Administrator with any questions concerning the disposition of the agency's records. RMDA will assist if the questions are not answered by this information paper or if unique situations arise that require policy guidance.

Michael P. Short/703-428-6298

Approved by:  _____