BPA Policy 236-11
Information Lifecycle Management

Table of Contents

1. Purpose & Background

A. This policy provides guidance for managing BPA's information assets using the information lifecycle and information hierarchy models.

B. As detailed in BPA Policy 236-1, BPA manages its information assets to ensure their characteristics (integrity, security, and availability). However, not all information has equal business value so it does not need the same integrity, security, and availability (e.g., an email about having lunch is not the same as a Record of Decision). Therefore, the IGLM Program categorizes information assets according to an information hierarchy as described in section 8.1 and manages those information assets according to the lifecycle stages described in sections 8.2 through 8.4. Together, these inform the information management policies, processes and procedures of BPA's IGLM Program.

2. Policy Owner

The Executive Vice President of Compliance, Audit and Risk Management has overall responsibility for this policy. The Agency Records Officer within Agency Compliance and Governance develops, implements and manages this policy on behalf of the Executive Vice President of Compliance, Audit and Risk Management.

3. Applicability

A. This policy applies to all recorded information created, received, or identified by BPA and the systems in which recorded information may be created, maintained, or stored including transitory recorded information, short-term records and Federal records.

B. This policy is media-neutral; it applies to all information assets regardless of form. However, specific procedures may apply depending on where and how the information assets are maintained and managed. For purposes of this policy, these are divided into three types:

1. Electronic Information - Recorded information in electronic format (requiring computer technology to retrieve or access); digital content. This definition includes both the content of the information asset and associated metadata. (see BPA Policy 236-13 Overview of Electronic Information Systems) This includes:

   a) Servers and hard drives

   b) Flash/thumb drives

   c) CDs/optical discs

   d) Diskettes and other obsolete or 'legacy' formats

   e) Backup tapes/disaster recovery tapes

2. Communication Tools – Electronic systems and devices whose primary function is communicating or transferring rather than storing, maintaining and managing data and information assests. (see BPA Policy 236-14 Overview of Communication Tools) This includes:

   a) Outlook (Email, Calendar, Tasks, Contacts)

   b) Office Communicator (IM, Live Meeting, etc.)

   c) PDAs, digital cameras, and other portable devices

   d) VOIP, videoconferencing, and voicemail

   e) Web records, cloud computing, and social media

   f) Faxes, printers, and scanners

3. Physical Media – Formats that do no require computer technology, though other equipment may be needed to access or retrieve the information assets. (see BPA Policy 236-15 Overview of Physical Media) This includes:

   a) Paper

   b) Charts/maps/drawings

   c) Film/microfilm/microfiche

   d) Photos/negatives

   e) Audio/video tapes

4. Terms & Definitions

A. As used in this policy, the following terms and definitions apply:

1. **Agency File Plan:** The systematic method of identifying specific types of records that are maintained, series descriptions, and disposition authorities. The Agency File Plan maps to the Large Aggregate Flexible Schedule approved by NARA for BPA.

2. **Electronic Information:** Recorded information in electronic format (requiring computer technology to retrieve or access); digital content. This definition includes both the content of the information asset and its associated metadata.

3. **Electronic Information System (EIS):** Computerized/digital means for collecting, organizing, and categorizing information to facilitate its preservation, retrieval, use, and disposition.

4. **Federal Record:** All recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions,

Organization		Title		Unique ID	
Information Governance		Information Lifecycle Management		236-11	
Author		**Approved by**	**Date**	**Version**	
Agency Records Officer – C. Frost		Executive Vice President of Compliance, Audit, and Risk Management – T. McDonald	June 8, 2015	2016-1	Page 3

policies, decisions, procedures, operations or other activities of the Government or because of the informational value of data in them. Materials made or acquired solely for reference, extra copies of documents preserved only for convenience of reference and stocks of publications are not included. (see Federal Records Act, 44 USC § 3301.)

5. **Federal Records Center:** Part of NARA's Federal Records Centers Program; Facilities that are fully compliant with regulations that protect records from fire, theft, pests, water damage, and natural disasters. These facilities provide storage and services for records to Federal agencies.

6. **File Code:** A functional classification system for BPA records. File codes contain the primary, secondary, and (in some cases) tertiary code assigned to the records series. File Codes are listed in alphabetical then numerical order.

7. **Inactive Physical Records Storage:** The area designated for use as long-term storage of Federal records that have not met their retention period but are no longer required for ongoing business activities. This area is designed to hold standard records storage boxes, is secured, and located in B-164a at BPA headquarters.

8. **Information Asset:** Recorded information that has business value for BPA and must be managed throughout its lifecycle.

9. **Information Governance & Lifecycle Management (IGLM):** A concept that describes the policies, strategies, processes, practices, services, and tools used by an organization to manage its information assets through every phase of their existence, from creation or receipt, through their useful life to final disposition either through destruction, deletion, or transfer to an institution approved for archival deposit of Federal records by NARA.

10. **Information Lifecycle:** Distinct phases of a record's existence, including identification, maintenance, and disposition.

11. **Large Aggregate Flexible Schedule:** A form of retention schedule and disposition authority allowed by NARA for Federal records that consists of items covering multiple related series of records. BPA uses a large aggregate flexible schedule ("The Big Bucket") that is arranged by business function. The Big Bucket maps to the Agency File Plan, which is arranged by sub function and retention.

12. **Media-Neutral:** Having no distinction in characteristics or treatment based on the medium, whether electronic or physical (paper, etc.).

13. **Medium:** (plural, media) The form and format in which content exists as recorded information. The two primary media are electronic and physical (paper, etc.).

14. **Metadata:** Structured information about any recorded information such as date and time the recorded information was created, the author, organization, or other data.

This also includes descriptions of content, structure, data elements, interrelationships, and other characteristics of data, information and records as well as information asset profiles or indexing data.

15. **Office of Record:** The organization that, by definition of its mission or function, has primary responsibility for maintenance and retention of the record.

16. **Personal Files:** Also called personal papers, documentary materials belonging to an individual, which are not used to conduct agency business. Personal files are excluded from the definition of Federal records and are not owned by the Government. (see 36 CFR 1220.18.)

17. **Physical Media:** Any means for capturing recorded information in either human-perceivable format (e.g. paper, charts, books, etc.) or machine-readable, non-digital format (e.g., film, microfiche, video/audio tape, etc.).

18. **Recorded Information:** Documents, information and data — including writing, drawing, graphs, charts, photographs, sound recordings, images, and other data or data compilations — stored in any medium from which content can be obtained directly or, if necessary, after conversion into another usable form.

19. **Retention Period:** Defines the length of time information and records are to be maintained and when or if they may be disposed; retention periods are identified within file code descriptions.

20. **Short-Term Record:** Information assets that may provide some evidence of the agency's organization, functions or activities, but is in an incomplete or draft form. Short-term records have a retention period of no more than three years.

21. **Structured Electronic Information System (SEIS):** Electronic information systems (EIS) used by BPA to collect/maintain data or records in a structured format, typically a database. As part of the System Lifecycle (SLC) process, the IGLM team reviews and approves these systems for use at BPA. Electronic Recordkeeping Systems (ERKS) are a sub-set of SEIS that meet additional records compliance requirements.

22. **Transitory Recorded Information:** Recorded information with no continuing business value. This may also include recorded information made or acquired solely for reference, extra copies of documents preserved only for convenience and stocks of publications. Transitory recorded information has a retention period of no more than ninety days.

B. As used in this policy, the following acronyms apply:

1. **DoD:** Department of Defense

2. **EIS:** Electronic Information System

3. **ERKS:** Electronic Recordkeeping System

4. **IGLM:** Information Governance & Lifecycle Management

5. **NARA:** National Archives and Records Administration

6. **SEIS:** Structured Electronic Information System

7. **SLC:** System Lifecycle

5. Policy

A. BPA manages all of its information assets throughout their lifecycles, which includes identification, maintenance and disposition.

B. The basic requirements for managing each lifecycle phase are found in 236-11.8.B (Identification), 236-11.8.C (Maintenance), and 236-11.8.D (Disposition). In addition, specific requirements based on media type are detailed in separate subject matter policies in the 236 series of BPA policy.

6. Policy Exceptions

A. Exceptions to this policy may be necessary based on legitimate business needs, legal or compliance requirements. Any exceptions must be documented, reviewed, and approved by the Office of Record, IGLM and IT.

B. Personal files/papers of BPA employees and contractors are not used to conduct agency business; they are generally not required to be managed according BPA Policy 236-1 and the 236 series of BPA policy. Similar to the policy on personal use of agency IT equipment (see BPA Policy 470-6 Limited Personal Use of BPA IT Services), limited personal files/papers are allowed. If an employee does maintain personal files/papers at work, they must be treated as follows:

1. Personal files must be clearly designated as such and must be maintained separately from the organization's information assets.

2. Information about private (non-agency) matters and agency business must not be mixed in outgoing agency documents, such as correspondence and messages.

3. If information about private matters and BPA business appears in a received document, the document is a Federal record. A copy of the document with the personal information deleted or redacted may be made and treated as the Federal record.

4. Materials labeled "personal," "confidential," or "private," or similarly designated, and used in the transaction of public business, are Federal records. The use of a label such as "personal" does not affect the status of Federal records (see 36 CFR 1220).

7. Responsibilities

A. **Agency Records Officer:** Manages the IGLM program and develops, issues, and enforces policies for managing BPA's information assets through their lifecycle to ensure compliance, reduce risk, and improve operational effectiveness and efficiency.

B. **IGLM Team:** Coordinates the overall IGLM program. Provides guidance and assistance to all BPA organizations with lifecycle management and coordinates required records reviews, evaluations, and reports.

C. **Information Technology Organization:** Develops and manages BPA's technology to support lifecycle management of information assets.

D. **Managers/Supervisors:** Effectively manage information assets within his or her area of responsibility in a consistent manner to ensure the integrity, security, and availability of information assets.

E. **BPA Employees/Contract Personnel:** Ensure that information assets they create, receive, or use in the performance of their daily activities are managed efficiently and in accordance with BPA policy.

8. Standards & Procedures

8.1 Information Assets Hierarchy

A. All information assets are managed, stored, used and accessed according to a hierarchy based on initial identification of the following categories: transitory recorded information, short-term information, and Federal records.

B. Each category contains a profile of requirements that determines the location, security and metadata or file organization required for maintenance, as well as the length of time (retention period) within the category that is permitted.

C. Transitory Recorded Information. Transitory recorded information is the most broadly defined of categories and has the fewest requirements for organization, management and maintenance. However, because there are few requirements, it has a limited retention period of no more than ninety days. For retention beyond ninety days, the information asset must be categorized as a short-term record (see below). The following metadata must be authentically captured for all transitory recorded information in electronic format:

1. The date/time of creation/receipt;

2. The creator/recipient of the content;

3. The location of creation/receipt; and

4. Modification information such as date/time, editor name, and edit location.

Organization		Title		Unique ID	
Information Governance		Information Lifecycle Management		236-11	
Author	**Approved by**		**Date**	**Version**	
Agency Records Officer – C. Frost	Executive Vice President of Compliance, Audit, and Risk Management – T. McDonald		June 8, 2015	2016-1	
					Page 7

D. <u>Short-Term Records</u>. Short-term records are information assets identified as providing some evidence of the agency's business transactions, but are in an incomplete or draft form. Short-term records may be maintained for a maximum of three years and must then be either disposed of or converted to a Federal record. In addition to the metadata listed for transitory recorded information, all short-term records should be assigned:

1. One of the 24 business record categories identified in BPA's Large Aggregate Flexible Schedule; and

2. An Office of Record.

E. <u>Federal Records</u>. Federal records are information assets meeting the definition found in the Federal Records Act as providing evidence of the BPA's organization, function or actions. They require the following:

1. A file code with a retention schedule as identified in the Agency File Plan (see 236-12 Large Aggregate Flexible Schedule and Agency File Plan).

2. If electronic information, maintenance in an approved Structured Electronic Information System (SEIS). Approval of each SEIS includes a risk-based analysis of the need for the system to meet the requirements of DoD 5015.2 STD as recommended by NARA. An Electronic Recordkeeping System (ERKS) is one that substantially complies with DoD 5015.2 STD, which includes:

   a) The system has appropriate security/permission requirements;

   b) Records within the system cannot be deleted or changed except by authorized individuals;

   c) Deletions and/or changes to records within the system are tracked (version control);

   d) All records accessed from the system are an accurate depiction of the records as they were input.

3. If physical media, the Office of Record and file code are identified on the record or file itself. In addition, each organization that maintains physical Federal records must also maintain an index of those records and their location. Physical Federal records that have not met their retention, but are not necessary for continuing business operations may be transferred to Inactive Physical Records Storage.

4. Disposition according to their retention schedule.

8.2   Lifecycle Management: Identification

A. BPA identifies the information assets it creates or receives and categorizes them to determine their continuing business value, how they will be used and by whom.

Business value is determined by the likelihood that the information assets meet the definition of a Federal record (essentially, evidence of BPA's activities and transactions). If the information asset has business value, then it must be categorized. Categorization means determining responsibility for, access to, retention of, and metadata about the information asset as described in subsections a – d of this paragraph. If the information asset is not business related, it is considered transitory, with no business value, and should be appropriately disposed of within 90 days.

1. Responsibility. Determine which organization is responsible for specific types of information assets (the Office of Record), and ensure that the Office of Record maintains the information assets being categorized. In certain instances, more than one organization may be identified as the Office of Record, but it is not always necessary for each Office of Record to maintain a discrete copy of the information assets being categorized. The Office of Record for each type of information asset is identified in the Agency File Plan (see BPA Policy 236-12 Large Aggregate Flexible Schedule and Agency File Plan).

2. Access. Determine what personnel, organizations or other entities need the information assets to perform work and what level and type of security may be necessary to enable access. Also consider the need for multiple copies (as required or for convenience). Multiple copies should be kept to a minimum to reduce agency costs to store, manage and dispose of information assets.

3. Retention. Determine how long the information asset is needed for the agency to accomplish its business function (the continuing business value). Most of BPA's information assets have a retention schedule detailing the mandatory length of time the item must be retained. Refer to the Agency File Plan to determine the correct retention period (see BPA Policy 236-12 Large Aggregate Flexible Schedule and Agency File Plan).

4. Metadata. Identify what metadata must be captured or assigned to the information asset for it to be efficiently and effectively categorized, maintained and disposed. Some metadata for electronic information is automatically captured. In other instances, the metadata can be identified from the structure of information assets, e.g., the "To:" and "From:" lines on a physical memo or fields in a physical form. The amount of metadata required to be captured depends on the type of information asset.

B. Policies for categorization of information assets that are identified, created or received, by specific media type, are detailed in medium specific policies in the 236 series of BPA policy.

C. The IGLM team coordinates with information technology stakeholders to ensure that capabilities to implement these policies are incorporated into planning, development or redesign of electronic information systems as part of the System Lifecycle (SLC) process.

8.3   Lifecycle Management: Maintenance

A. BPA maintains its information assets in an efficient, effective manner which includes controls over the maintenance, security, and use of information assets in the conduct of current business (see 44 USC 3102). Maintenance, security, and use policies apply to all media in which information assets exist.

B. BPA organizes its information assets to allow easy access for authorized users and to ensure a minimum number of duplications.

C. BPA maintains an index for each media type as necessary to facilitate the organization, use, and ability to efficiently and effectively search information assets. Organizing principles incorporate the Agency File Plan, and also reflect the agency's organizational structure and business processes. Indices must be searchable using metadata and, where enabled, information descriptions and content. Indices must also track changes to metadata.

D. BPA also maintains an index of systems with descriptions, location, and designation of systems of record. This list shall include all new IT systems as well as IT systems that are no longer in use.

E. BPA requires internal controls over maintenance and use, including security access and permissions, according to the unique requirements of each media type. Policies for the appropriate maintenance, security and use information assets, by media type, are detailed in medium specific policies in the 236 series of BPA policy.

F. The IGLM team coordinates with information technology stakeholders to ensure that capabilities to implement these policies are incorporated into the planning, development, or re-design of electronic records systems through the System Lifecycle (SLC) process.

8.4   Lifecycle Management: Disposition

A. As stated in BPA Policy 236-1 Information Governance & Lifecycle Management, BPA's information assets may not be removed or destroyed without appropriate authorization. BPA disposes of its information assets according to the retention schedules outlined in its Large Aggregate Flexible Schedule which is detailed in the Agency File Plan. This includes transitory recorded information, short-term records and Federal records. Information assets that have met their retention will be disposed of in a timely, efficient, effective, and secure manner.

B. Disposal includes destruction of physical media as well as deletion of electronic information or, in the case of permanent records under 36 CFR sect. 1235, the transfer of legal ownership to NARA. BPA does not dispose of its Federal records by transferring them to Federal Records Centers for storage. Disposition also includes retirement of electronic record systems and assessment of the need to either delete data contained in the system or migrate the data to another system.

C. Policies and procedures that are necessary for each media type to appropriately dispose of information assets are detailed in medium specific policies in the 236 series of BPA policy.

D. The IGLM Office will coordinate with Information Technology stakeholders to ensure that capabilities to implement these policies are incorporated into planning, development, or re-design of electronic records systems throughout the System Lifecycle (SLC) process.

8.5   Means of Disposition

A. Destroying Information Assets. BPA destroys its physical Federal records according to the requirements of 36 CFR 1226.24, which requires physical destruction of the physical medium. This form of destruction applies to paper, photographs, microfilm, microfiche, charts etc., as well as electronic media (e.g., diskettes, videotapes, etc.).

B. Deleting Electronic Information. Electronic information maintained on servers that has met its retention is disposed of by deletion according to standards and processes determined by the IT organization. In the normal course of business, this means the data is overwritten on IT equipment, servers and backup tapes. It does not include actively expunging or "scrubbing" IT equipment, servers or backup tapes unless authorized.

C. Transfer of Federal Records. The only temporary Federal records disposed of by transfer are Official Personnel Folders and Employee Medical Files, which are transferred, along with legal ownership, to the Office of Personnel Management. Permanent Federal records will be offered to NARA. Offers to NARA include transfer of legal ownership. Reference copies of permanent Federal records may be included in BPA's library collection. All other copies of permanent Federal records should be destroyed upon transfer of legal ownership to NARA. If there is a continuing business need for the records, that business case must be submitted by the Office of Record to the Agency Records Officer for approval prior to the transfer.

8.6   Legal Holds

Preservation of information assets beyond their approved retention periods shall occur when a legal hold is placed by the Office of General Counsel for purposes of litigation and regulatory or other similar obligations. The Office of General Counsel coordinates

these efforts and provides instructions to impacted organizations, the IGLM Office, Cyber Security, and the appropriate IT organization(s).

9. Performance & Monitoring

A. The IGLM team is the responsible organization for the performance standards and monitoring plans contained in this policy.

B. **Performance Standards**

1. Reduction of uncategorized information assets

2. Reduction of duplicated information assets

3. Increased accuracy in identification and metadata assignment to information assets

4. Reduction of incremental increase in data (physical and electronic) storage needs

5. Reduction of information assets existing beyond authorized retention periods

C. **Monitoring Plans**

1. Regular (three-year cycle) review of information asset plans

   a) Regular (at least annual) inventory of physical storage

   b) Regular review of permissions for access to EIS

   c) Regular compliance reviews of organizations' information assets, including categorization and metadata captured

   d) Regular audit of information assets subject to legal hold

   e) Maintenance of an agency data map/EIS inventory

   f) Monitoring through use of information technology

   g) Maintenance and review of disposition authorizations

10. Authorities & References

1. 44 USC 3102: Establishing agency programs for management of, effective controls over, and appropriate disposal of records of temporary value

2. 44 USC 3105: Establishing safeguards against removal/loss of Federal records

3. 36 CFR 1220-1239: Federal Records Management, general

4. 18 USC 2071: Criminal sanctions for unauthorized removal/destruction of Federal records

5. DoD 2015.2: Standard for systems maintaining Federal records

Organization	Title		Unique ID	
Information Governance	Information Lifecycle Management		236-11	
Author	**Approved by**	**Date**	**Version**	
Agency Records Officer – C. Frost	Executive Vice President of Compliance, Audit, and Risk Management – T. McDonald	June 8, 2015	2016-1	Page 12

6. BPA Policy 236-1: BPA IGLM program authorization

11. Review

IGLM within Governance and Internal Controls is the responsible organization for this policy. This policy is reviewed on a three-year cycle beginning in 2015. All IGLM Manual policies are reviewed when revisions are introduced to BPA Policy 236-1 Information Governance and Lifecycle Management or other policies governing information management. Editorial updates to the policy and attachments may be made without IGOT and Policy Working Group review and approval.

12. Revision History

This chart contains a history of the revisions and reviews made to this document.

Version Number	Issue Date	Brief Description of Change or Review
2012-1	2012-11-05	Published completed original chapter, cmfrost.
2013-1	2013-09-03	Updated formatting, sec. 07, cmfrost.
2015-1	2015-06-08	Migration to new BPA policy format.
2016-1	2017-22-03	Revision to update IGLM Program Organization change from Agency Compliance & Governance to Information Governance, update the definition of a short-term record and migration to the new BPA policy format, cmfrost. | This was a minor revision subject to policy working group and Labor Relations review. [T. Ono]