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Big Bucket Schedule Implementation

Assessment Report

National Archives and Records Administration
November 2020

Records Management Assessment
Big Bucket Schedule Implementation

INTRODUCTION

The National Archives and Records Administration (NARA), based on authority granted by 44 United States Code (U.S.C.) 2904(c), is responsible for assessing the proper management of records in all media within Federal agencies to protect rights, assure government accountability, and preserve and make available records of enduring value. Under this authority, NARA conducts records management (RM) oversight of Federal agencies, including agency inspections and assessments. An assessment is a multi-agency evaluation of a specific topic, issue, or activity affecting RM processes, procedures, or policies. The purpose of conducting an assessment is to determine efficacy of processes, procedures, or policies and identify common successes and challenges, as well as identify any best practices that can be shared with the Federal government RM community.

In the second quarter of FY 2020, NARA conducted an assessment on eight agencies, including one department and three of its bureaus, pertaining to the implementation of big bucket schedules. Agencies were selected based upon the existence of active big bucket schedules used by their agency to manage records disposition authorities.

Agencies completed and submitted to NARA a questionnaire along with any crosswalks, file plans, or inventories for records associated with a big bucket schedule. NARA conducted interviews with each agency and asked questions focused on five categories including: the agency's scheduling approach, big bucket RM training, schedule implementation for accessioning and disposal, internal controls, and big bucket scheduling approach satisfaction.

This report synthesizes information gathered via the data call and individual interviews and contains 13 findings, 16 recommendations, and one best practice to meet RM requirements and establish best practices.

BIG BUCKET SCHEDULING BACKGROUND

The Flexible Scheduling approach was initiated with the issuance of *NARA's Strategic Directions for Federal Records Management,* July 2003 (*Strategic Directions*). The Strategic Directions established that by integrating these new, flexible scheduling approaches agencies can schedule temporary records "at any level of aggregation that meets their business needs." The intent of this new process was to reduce the inventorying and scheduling effort for routine records, spur a review of outdated schedules, and shift focus from temporary records scheduling to that of permanent records, particularly electronic records systems, to support their eventual accessioning into NARA. Originally, permanent records were not intended to be scheduled under the big bucket approach; however, the issuance of Bulletin 2005-005 allowed for the inclusion of permanent records under a big bucket schedule. This change in approach was in response to agencies adopting records management applications (RMAs) to manage the ever-increasing amount of electronic records. Traditional, granular schedules were perceived to

be incompatible with an RMA because end users found it difficult to make retention and filing decisions given so many choices. Agencies were concerned that successful implementation of an RMA would not be possible without simplifying records retention policies. The FAQs were issued via Bulletin 2010-03 in 2010.

SUMMARY AND ANALYSIS
Scheduling Approach
The majority of agencies indicated that their records scheduling approach is function-based. A few of the records officers identified a combination of functional and organizational based scheduling approaches. All use a combination of traditional and big bucket schedules in addition to the GRS to manage records. Most of the agencies intend to transition to big bucket schedules to meet future scheduling needs. Two agencies under a department will cease creating schedules under their own agency record groups and transition to using departmental big bucket schedules only. One agency plans to supersede its existing big bucket schedules to transition from the use of the large aggregation items, back to the use of functional, traditional schedules with granular items. This agency cited that their big bucket schedules do not necessarily support the same function and much of their big bucket schedule items have been superseded by the GRS. Another agency determined, in collaboration with their appraisal archivist, that after writing two big bucket schedules the approach was not the right fit. The agency is small and the task of creating big bucket schedules is too burdensome.

This discussion highlighted an inherent misunderstanding in how some federal agency RM staff think about big bucket schedules and how NARA characterizes them. Several agencies cited confusion over how NARA defines types of schedules and the use of multiple terms to refer to the same type of schedule--for example flexible, big bucket, aggregate, and functional all appear to be used to refer to the same type of schedule.

Several agencies indicated that they transitioned to the big bucket scheduling approach to reduce the number of disposition authorities that need to be managed in preparation for transitioning to an Electronic Records Management System (ERMS). Though some agencies are using an ERMS, they have not fully harnessed automation capabilities and their RM workflow is still largely a manual process. Agencies also indicated that the transition from creating and maintaining textual records to creating and maintaining electronic records has not affected their schedule implementation; therefore, this report makes no distinction between the management of textual records and management of electronic records.

Finding 1: Scheduling terminology is not clearly defined and consistently used.

Recommendation 1: NARA should revise schedule type definitions and use more consistent language in guidance and requirements.

Big Bucket RM Training
Due to the complex nature of these schedules, NARA's Flexible Scheduling FAQ 2.5.1 indicates a need for agencies to provide specific training on the use and implementation of their big bucket

schedules. Most of the agencies do not offer formal big bucket schedule specific training, but some AROs indicate that general schedule implementation is covered by their RM general training. One agency offers guidance via PowerPoint slides to explain the use of one of its big bucket schedules to its RM network. Other agencies indicate that no training, or inadequate training, is offered due to lack of a permanent records officer, or one with full records management responsibilities.

Finding 2: No training specific to big bucket schedule implementation is offered to agency staff.

Recommendation 2: Agency should develop and disseminate big bucket schedule implementation training to agency staff. <u>Flexible Scheduling FAQ 2.5.1</u>

<u>Multiple Cut off Instructions</u>
Several agencies use multiple cut off instructions in their big bucket schedules due to the variety of records series covered by a single big bucket item and the differing retention needs for those records series. Some agencies indicated difficulty managing multiple cut off instructions across multiple programs with differing business needs. They also came to realize that cut off language in their schedules was poorly written and it is unclear to office and program staff how to implement the instructions. These agencies are working with their appraisal archivists to determine how best to clarify this language. One agency noted that guidance for writing multiple cut off instructions found under Flexible Scheduling FAQ 2.4.8 is ambiguous and confusing, and would like more definitive guidance.

Agencies tend to leave cut off up to the individual program offices to determine according to their business needs. Cut off instructions included on records schedules operating under this practice generally refer users to office or program file plans that are supposed to document the specific cut off instructions. One agency acknowledged that there are some offices where cut off instructions are absent from their file plans and the RM network staff contact the ARO for assistance. Absent cut off instructions in a file plan pose a risk for early destruction. Most of the agencies do not conduct a regular review of file plans or cut off implementation to ensure records are being cut off accordingly; this compounds the potential risk for early destruction.

Finding 3: Agency has not updated all file plans with appropriate cut off instructions for records covered by big bucket schedules.

Recommendation 3: Agency should include office or program specific cut off instructions in their respective file plan. <u>Flexible Scheduling FAQ, 2.4.8 & 2.5.2</u>

Finding 4: Agency does not conduct regular reviews of all office or program file plans to ensure proper cut off instructions are documented and to ensure eligible records are cut off accordingly.

Recommendation 4: Agency Records Officers should regularly review office or program file plans to ensure correct and implementable cut off instructions are included for records covered by a big bucket schedule. <u>Flexible Scheduling FAQ, 2.5.2</u>

Finding 5: Cutoff guidance provided by NARA is minimal and ambiguous.

Recommendation 5: NARA should consider developing detailed guidance pertaining to multiple cut off instructions to support agency use.

Superseding Big Bucket Items

Some agencies identified challenges superseding big bucket schedules and big bucket schedule items. One agency noted issues finding documentation of changes in superseding schedules. According to the agency, two of their big bucket schedules have been superseded in full, but NARA only noted them as superseded in part. The ARO stated that there was no documentation identifying the schedules as superseded in full. While superseded (or predecessor) items are noted in the new, superseding schedule, neither agencies nor NARA maintain comprehensive documentation reflecting supersessions. Another agency noted that disaggregating big bucket schedules has been an issue in their transition away from the big bucket approach. A big bucket schedule item generally provides disposition authority for multiple records series. Superseding a portion of that item is difficult depending on the original scope of the records schedule. The sheer complexity of managing records under a big bucket schedule underscores the necessity of maintaining up-to-date crosswalks and file plans.

Finding 6: Agency RM programs and NARA lack intellectual control over superseded big bucket schedules and scheduled items.

Recommendation 6.1: Agency RM programs should document changes to records series over time within crosswalks and on file plans. Flexible Scheduling FAQ, 2.5.2

Recommendation 6.2: NARA should create guidance explaining how to reschedule big bucket authorities under a differing scheduling approach.

Applying the GRS

All agencies use the GRS in addition to their agency schedules to manage records. Most of the agencies noted that at the office or program level there is confusion over when to apply the GRS and when to apply their big bucket schedule. Most of the records officers indicated that they defer to the program records custodians or liaisons the choice on whether to use the GRS or the agency big bucket schedule because they understand the program business needs. However, the records officers will provide assistance when asked. This practice reveals a larger problem central to the application of the GRS and causes inconsistent disposition of the same records across an agency. Allowing agencies to schedule records already covered by the GRS appears to undermine the purpose of the GRS to reduce the need for agency schedules for common records and provide consistent disposal across the federal government, particularly when flexible retention is permitted.

If an agency submits a notification to NARA within 120 days of a new GRS publication requesting to use their own disposition authority, or the agency submits a deviation request

with a new agency schedule that includes items covered by the GRS and either is approved, then the agency must use their designated agency schedule as the authority to manage those records--not the GRS. Conversely, if a notification or deviation request is denied, or neither request is made, the agency must use the GRS--not an agency disposition authority.

Finding 7: Agency is misinterpreting the application of the GRS and big bucket schedules by not applying the applicable disposition authority across the entire agency.

Recommendation 7: Agency must apply the same disposition authority for the same records across all agency offices and programs. If a notification or deviation request is made within 120 days of the GRS issuance and approved by NARA, the agency must use their agency disposition authority and not the GRS. If a notification or deviation request is not made within 120 days of the GRS issuance or the request is denied, the agency must use the GRS and not an agency disposition authority. 36 CFR 1227.12(a)(3)

Disposition: Applying the Big Bucket Schedule Item
Some agencies describe facing resistance by staff to accept the big bucket schedule approach and use of big bucket schedule authorities for disposal, and instead, continue to use superseded authorities. According to the records officers, staff indicated that the big bucket schedule items, particularly for big bucket schedules at the department level, do not adequately describe their records and it is difficult to determine whether records are permanent or temporary and which big bucket schedule item is applicable.

The records officers for these agencies believe that applying effective change management strategies may help ameliorate some of this resistance. They recognize the need to bridge records management needs with program offices' understanding of RM as well as desired information by archival staff (both internal to the agency and NARA custodial units). For a couple of agencies this resistance is exacerbated by the lack of a permanent records officer to centralize and enforce RM policies.

One agency identified that at the office or program level, staff use the broad nature of permanent big bucket schedule items to keep records that are actually temporary. This practice introduces risk to the agency if not caught by internal oversight. Temporary records kept beyond their legal retention, without an appropriate business need, increases an agency's public access responsibility burden. This practice may also incur unnecessary financial obligations for maintenance, migration, or storage. Additionally, this practice poses a risk that the temporary records may eventually be accessioned into the National Archives.

One of the original intentions of the big bucket scheduling approach was to streamline scheduling of routine, temporary records so that agencies could focus on creating schedules for permanent records to ensure capture and eventual accessioning into NARA's holdings. Allowing the bucketing of permanent records may be undermining that key initiative. Further study of big bucket schedule implementation may yield a more definitive determination.

Finding 8: Agency office or program staff resist use of big bucket schedule items because they feel their records are not adequately captured in the item description.

Recommendation 8: Agency Records Officers should work with office or program staff to assist them with understanding how their records fit under specific big bucket schedule items and update applicable file plans and the schedule crosswalks to ensure such records are captured and easily identifiable. Additionally, office and program staff should be included in the development process for new big bucket schedules to support buy-in and understanding of the schedule.

Finding 9: Because some agency big bucket item descriptions are too broad, agency office or program staff cannot properly identify the applicable big bucket schedule item or they apply a permanent big bucket disposition authority to temporary records in order to keep them rather than destroy them upon the disposal date, without a justified business need to keep them longer.

Recommendation 9.1: Agency should conduct regular reviews of office or program file plans to ensure all records are associated with the appropriate disposition authority.

Recommendation 9.2: NARA should consider further assessment of big bucket schedule implementation to determine risks posed to permanent records capture under this scheduling approach.

Accessioning Permanent Records

Few permanent records of the participating agencies have been accessioned into NARA under big bucket schedules. Many of the agency records have not met accessioning eligibility though a few agencies have overdue records scheduled under big bucket items. Of the agencies that have accessioned records under big bucket schedules, two issues were identified specific to the use of big bucket schedules--access to the applicable schedule records group in the Electronic Records Archive (ERA) and custodial unit requests for the superseded schedule items.

In ERA, during the account request process, agency staff are only given access to the record group associated with their specific agency. If an agency or bureau uses a department level big bucket records schedule, an additional request for access to the department record group schedules must be submitted and processed. Agencies identified this as time consuming and cumbersome. A few agencies indicated that it would be helpful if NARA could better support enterprise-wide system updates for ARCIS and ERA to ensure schedule changes associated with big bucket schedules occur and in a timely manner.

Some of the agencies expressed frustration over NARA custodial unit requests for superseded schedule item citations when accessioning permanent records. For the custodial unit, this helps ensure the records are in fact permanent and belong in NARA's holdings, as well as aiding in processing and description efforts, particularly since big bucket schedule items encompass multiple schedule items from superseded schedules. For the agency it is burdensome as it

defeats the purpose of using the big bucket schedule and reducing management of series level disposition authorities. Maintaining regularly updated crosswalks and identifying the crosswalk series item at the time of accessioning would ameliorate consternation during the accessioning process, particularly given the challenges agencies cited with identifying the correct big bucket schedule items.

Finding 10: ERA does not support bureau or agency level needs for department level big bucket records schedule access.

Recommendation 10: NARA should address this in future revisions of ERA.

Finding 11: Records proposed for accessioning are not clearly identified at the series level within the applicable big bucket item.

Recommendation 11.1: Agency should identify the specific records series, as reflected on the crosswalk, covered by a big bucket schedule item when accessioning permanent records into the National Archives.

Recommendation 11.2:   NARA should provide more detailed and specific guidance to agencies regarding permanent big buckets to include, but not limited to, a required level of description, specific cut off and accessioning instructions, and accurate crosswalks that identify records at the series level.

Overdue Records
Several agencies have numerous records scheduled as permanent under big bucket schedules that are overdue for accessioning into NARA. Some of the agencies indicated they have not accessioned permanent records due to litigation freezes, an issue unrelated to big bucket schedules. Agencies were unaware that NARA accepts accessions of permanent records subject to litigation freezes.

It is worth noting that, based on NARA's Federal Records Centers Program (FRCP) data, big bucket schedules have contributed to the unnecessary freezing of records not subject to litigation holds. Because big bucket schedule items cover multiple records series under a single disposition authority, when a litigation freeze is issued often the agency does not drill down to the specific series level to freeze only those records. Rather, the freeze is placed on all of the records series under that single disposition authority. This practice unnecessarily impedes the proper and lawful disposition of records not subject to the litigation freeze.

Finding 12: Agency has permanent records overdue for accessioning into the National Archives.

Recommendation 12: Agency must accession overdue records into the National Archives. 36 CFR 1235.12

Best Practice: Agency should identify records at the series level, via crosswalk or file plan that are subject to a litigation freeze.

<u>**Internal Controls**</u>
Most agencies utilize a combination of crosswalks, file plans, and disposition SOPs as tools to document disposition authorities to support records disposal. Agencies noted that use of the tools across their offices and programs is inconsistent due to internal resistance to big bucket schedule use. For several agencies, the lack of RM support staff to carry out and assist with the management of big bucket schedule implementation contributes to the inconsistency. For a couple of agencies this inconsistency and resistance is not addressed due to the lack of a permanent records officer, or one with full RM responsibilities and authority to centralize and enforce records management policies.

Two agencies have established internal controls to conduct oversight to ensure program file plans accurately reflect the correct disposition authority, an important practice that supports correct disposition implementation. One of these agencies conducts an annual evaluation requiring their records custodians to update file plans and submit to the RM program for review. The RM team reviews each file plan against a standard matrix and provides each program with a scorecard. Any findings made during the RM program review must be addressed and resolved by the program office before the next year's submission. This model serves as a very robust and effective mechanism for regular file plan review. Another agency utilizes an internal records schedule system in which schedule information is centrally managed with locations and including file plans with associated disposition authorities and inventories.

Using crosswalks, file plans, disposition SOPs, and conducting reviews of such tools, while good and important practices, does not replace the need for an internal oversight mechanism to assess the accuracy of disposition authority application. In analyzing FRCP data of agencies included in this assessment, findings indicate that a number of records transfers have been made citing disposition authorities superseded by big bucket schedules. Application of the incorrect disposition authority could potentially lead to a number of negative consequences such as improper disposal of records or perhaps failure to capture records subject to litigation freezes.

Finding 13: No oversight mechanism exists to evaluate whether the correct schedule item is applied at disposition.

Recommendation 13: Agency must develop an internal control process to support schedule application oversight to assess accuracy of disposition authority implementation. <u>36 CFR 1220.34(j)</u>

Big Bucket Scheduling Approach Satisfaction
Overall, the majority of agencies are satisfied with their big bucket schedules. The most commonly cited benefit of the big bucket schedule approach is the reduction of disposition authorities to manage. As stated previously, several of the agencies are in the process of

writing, or plan to write, big bucket schedules in the future. Some agencies that plan to write new big bucket schedules in the future stated that they will still write traditional schedules where big buckets schedules are not suitable. One agency plans to replace their big bucket schedule with functional schedules, citing difficulty with implementation and tracking supersessions. Another agency, in discussion with their appraisal archivist, determined that the big bucket approach was not suitable going forward for their small agency; the work required to continue writing big bucket schedules posed an administrative burden that could not be handled by the RM program.

CONCLUSION

The general consensus among the agencies using the big bucket schedule approach was to reduce the number of disposition authorities and their administrative burden of managing those authorities. This was largely successful for the participating agencies. While big bucket schedules have reduced the number of disposition authorities to be managed, each agency identified implementation as a challenge across their agencies at the office or program levels. Areas identified as needing improvement affecting implementation include: training, crafting and using multiple cut off instructions, and disposal for both permanent and temporary records. Lack of oversight to track and evaluate whether the correct schedule item is applied at disposition perpetuates these process gaps. These gaps are slow to be addressed because agencies do not have the resources-- funding and RM staff--to dedicate to the work.

While these issues surfaced through the lens of this assessment focused on big bucket schedule implementation, they are not necessarily exclusive to the use of big bucket schedules, but also exist with general schedule implementation, regardless of the type of schedule used. Transitioning to big bucket schedules did not fix already existing schedule implementation problems, but in fact further underscored the problems. This indicates a short-term need to develop guidance targeted to the areas of concern identified in this assessment and to further assess overall schedule implementation.

Appendix B
Big Bucket Implementation Assessment Questionnaire

1. Are you aware of the Frequently Asked Questions (FAQs) about Flexible Scheduling issued by NARA via NARA Bulletin 2010-03 *

2. Do any of your agency's big bucket schedules cover permanent records? *

3. Do any of your agency's big bucket schedules cover records in electronic formats only? *

4. Does your agency apply multiple cut off instructions within any big bucket schedule item? *

5. Has your agency identified any new records series or systems that would fall under the big bucket schedule since its approval? (Flexible Scheduling FAQ 2.3.4) *

6. Does your agency use crosswalks or file plans to manage the records covered in big bucket schedules? *

7. Does your agency update crosswalks when new records are added to a big bucket schedule? (Flexible Scheduling FAQ 2.5.2) *

8. When was the most recent crosswalk update?

9. Does your agency update file plans when new records are added to a big bucket schedule? (Flexible Scheduling FAQ 2.5.2) *

10. When was the most recent file plan update?

11. Does your agency maintain a regularly updated inventory of records covered by big bucket schedules? *

12. To date has your agency accessioned into NARA any permanent records under a big bucket schedule? *

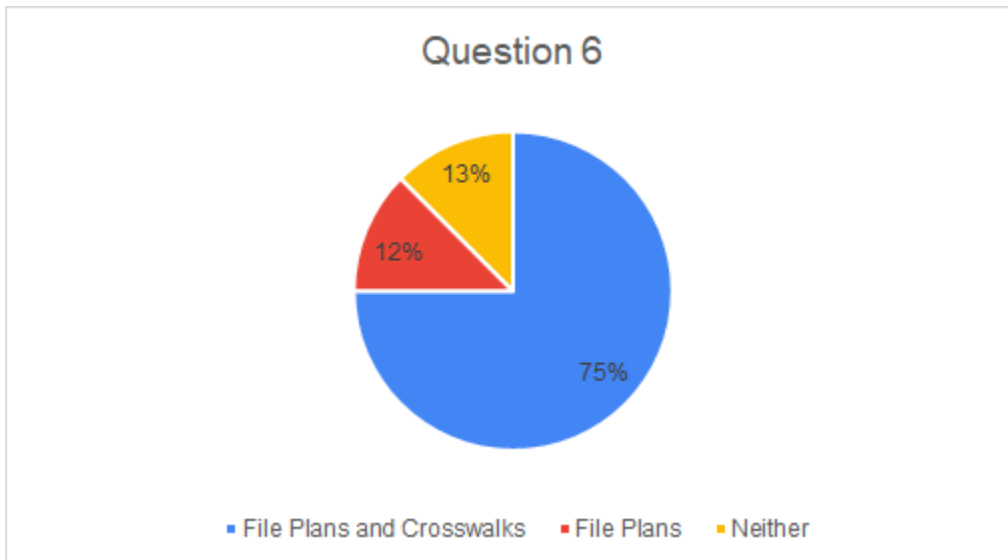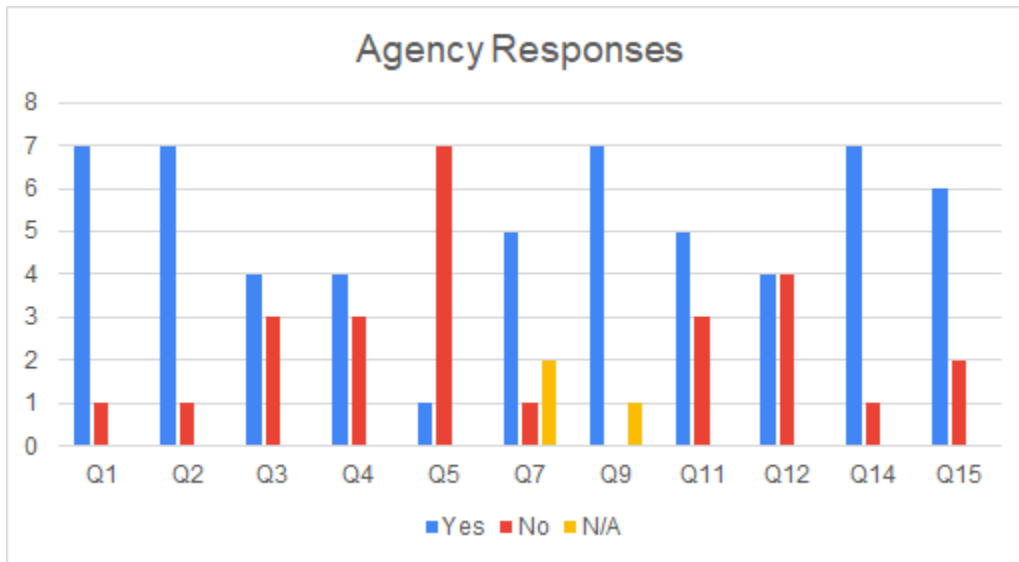13. If your agency has accessioned permanent records to NARA under a big bucket schedule were they:

  Electronic / Textual / Cartographic / Sound and Motion / Other:

14. To date has your agency disposed of any temporary records under a big bucket schedule? *

15. Are agency staff trained to use and monitor big bucket schedules? (Flexible Scheduling FAQ 2.5.1) *

Required answer indicated by *.

Appendix A
List of Participating Agencies

Bureau of Ocean Energy Management
Bureau of Safety and Environmental Enforcement
Department of the Interior
National Archives and Records Administration (Corporate Records Management)
National Institutes of Health
National Park Service
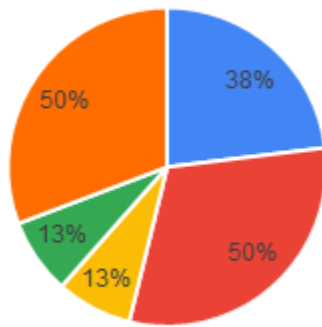Pension Benefit Guaranty Corporation
Presidio Trust

Agency Responses

Question 6

Question number 8 and number 10 do not appear in graphic data because the response required a date.
- For question number 8 five agencies updated their crosswalks within the last two years, one updated their crosswalk in 2014, two agencies do not use crosswalks.
- For question number 10 six agencies updated their file plans within the last year, one agency did not indicate the date of the last update, one agency does not use file plans.

Question 13

Electronic 38% · Textual 50% · Cartographic 13% · Sound and Motion 13% · No Response 50%