

BPA Policy 236-15

Overview of Physical Media

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1. Purpose & Background

- A. This policy provides an overview for the agency’s physical media available for storing and managing recorded information in physical formats.
- B. BPA uses physical media to manage and store recorded information in support of the agency’s business functions. Policies are required to ensure all recorded information stored or managed on the types of agency physical media outlined in this chapter comply with the business objectives for information assets listed in BPA Policy 236-1 Information Governance and Lifecycle Management (IGLM).

2. Policy Owner

The Executive Vice President of Compliance, Audit, and Risk Management has overall responsibility for this policy. The Agency Records Officer within Information 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 sets requirements for the use of BPA’s physical media.
- B. The focus of this policy is on physical media – information maintained in formats that do not require computer technology to access, though other equipment may be needed for access or retrieval. This policy applies to the physical media listed below:
 - 1. paper;
 - 2. charts/maps/drawings;
 - 3. film/microfilm/microfiche;
 - 4. photos/negatives; and
 - 5. audio/video tapes and other non-digital, machine readable media.
- C. Policies specific to each type of system will be detailed in the 236 series of BPA policy.

4. Terms & Definitions

- A. As used in this policy, the following terms and definitions apply:
 - 1. **Convenience Copy:** Also a reference copy or rendition, a duplicate of a short-term or Federal record.
 - 2. **Disposition:** Actions taken regarding information assets that are no longer needed to conduct regular, current business.

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3. **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.
4. **Electronic Information System (EIS):** Computerized/digital means for collecting, organizing, and categorizing information to facilitate its preservation, retrieval, use, and disposition.
5. **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, 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.
6. **Information Asset:** Recorded information that has business value for BPA and must be managed throughout its lifecycle.
7. **Microfilm/Microfiche:** A film that contains images in greatly reduced form, typically requiring machine technology to view the image.
8. **Office of Record:** The organization, by definition of its mission or function, that has primary responsibility for maintenance and retention of the record.
9. **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.).
10. **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.
11. **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.
12. **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.

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13. **Essential Record:** Those records that are essential to the continued functioning or reconstitution of BPA during and after an emergency, including those records essential to preserving the legal and financial rights and interests of the organization and individuals directly affected by its activities as well as emergency operating materials key to maintaining the critical functions of the agency.

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

1. **EIS:** Electronic Information System
2. **IGLM:** Information Governance & Lifecycle Management

5. Policy

- A. Each of the physical media described in this policy has certain features and functionality that makes it more or less feasible for storing and managing an organization’s recorded information. Use of physical media should be determined based on type of recorded information (transitory, short-term, Federal record, or essential record) with consideration for the integrity, security, and availability required for the material being stored and how the material must be managed through its lifecycle.
- B. Organizations should consistently organize and use physical media to support their business functions, reduce duplication, provide appropriate access to personnel, and manage the information assets for which they are responsible. This includes indexing and documenting the organization’s procedures for Federal records stored on physical media. To assist in maintaining an inventory of the agency’s Federal records, organizations are required to include the media and location of their records on an Information Asset Plan, which is submitted to IGLM tri-annually or when changes occur. (See BPA Policy 236-12 Large Aggregate Flexible Schedule and Agency File Plan).

6. Policy Exceptions

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 and IGLM.

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. **Information Governance:** The IGLM Team within Information Governance develops, issues, and enforces policies for physical media that ensure compliance obligations are met, reduce litigation risks and improve operational effectiveness and efficiency of the

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agency's information assets. The IGLM team develops policies in collaboration with the Information Technology Office and organization stakeholders.

- C. **Managers/Supervisors:** Ensure the information assets their organizations create, maintain, and use in support of their business function are managed in a consistent manner to ensure the integrity, security, and availability of information assets.
- D. **BPA Employees/Contract Personnel:** Ensure that information assets they create, receive, or use in the performance of their daily activities, including physical records, are managed efficiently and in accordance with BPA policy.
- E. **Library and Visitor's Center:** Maintains specialized equipment to read microfilm/microfiche and can provide guidance when determining the historical value of physical media.

8. Standards & Procedures

A. Paper:

1. BPA uses paper as a tool for organizations to share and manage their recorded information. Due to advances in technology, most recorded information is no longer created and maintained solely in paper format. As a result, the majority of recorded information printed to paper consists of drafts and convenience copies, which should be disposed of when no longer needed.
2. Previously, paper was the preferred method of storage for recorded information and, as a result, BPA still maintains a large volume of archived paper recorded information. This recorded information must be appropriately managed until its disposition. The biggest risk to storing recorded information on paper is the lack of a backup copy for disaster recovery. Where possible, IGLM encourages organizations to scan their paper Federal records, upload them to one of the preferred EIS, and destroy paper copies. (See BPA Policy 236-160 Digitizing Records From Physical Media.)
3. Recorded information that is stored electronically should not be printed to paper for preservation.
4. IGLM maintains a secure storage location for organizations to store their inactive paper Federal records. Each organization is responsible for the contents of the individual boxes. See BPA Policy 236-201 Inactive Physical Records Storage. (to be drafted)

B. Charts/Maps/Drawings:

1. Charts/maps/drawings are generally considered recorded information that retains data in a visual arrangement, often on oversized media. Like paper, recorded

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information such as charts/maps/drawings are much less likely to be produced solely in physical form. All drafts and convenience copies should be disposed of when no longer needed. Archived charts/maps/drawings must be appropriately maintained until disposition.

2. It is preferable that charts/maps/drawings be stored in electronic format. Where possible, IGLM encourages organizations to scan their Federal records, upload them to one of the preferred EIS, and destroy paper copies.
3. IGLM maintains a secured storage location for organizations to store their inactive paper Federal records which includes carts/maps/drawings. Each organization is responsible for the contents of the individual boxes. See BPA Policy 236-201 Inactive Physical Records Storage. (to be drafted)

C. Film/Microfilm/Microfiche:

1. Microfilm (reels)/microfiche (sheets) are film media that contain images produced by exposure to light-sensitive materials contained in the film. These are considered obsolete, and it is preferred that Federal records no longer be converted to this medium. BPA’s Library and Visitor’s Center maintains the specialized equipment needed to read archived microfilm/microfiche, and this media must be appropriately managed until disposed.
2. Additionally, microfilm/microfiche requires climate-controlled storage and lacks a backup copy for disaster recovery. Where possible, IGLM encourages organizations to transfer Federal records stored in this media to an EIS that has backup and disaster recovery tapes and then destroy the microfilm/microfiche.
3. Organizations should also consider the obsolescence of microfilm/microfiche now that newer, preferred technologies, such as scanning exist.

D. Photos/Negatives:

1. Photos/negatives are a great source of history for BPA. As such, they should be properly preserved, yet they present unique preservation challenges as they become fragile and brittle over time and most lack proper identifying information, i.e., people, places, events, etc. With the development of digital technology, printed photos/negatives are no longer the preferred medium for storage. All archived photos/negatives must be appropriately maintained until disposition.
2. Considering the historical value that the physical original may have, where possible, IGLM encourages organizations to transfer Federal records stored as photos/negatives to an EIS that has backup and disaster recovery tapes and then destroy the original photo/negatives.

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E. Audio/Video Tapes and Other Non-Digital, Machine Readable Media:

1. All magnetic media has a relatively short life expectancy and is not the preferred storage medium for Federal records. All archived audio/video tapes must be appropriately maintained until disposition.
2. Considering any historical value the physical original may have, where possible, IGLM encourages organizations to transfer their Federal records stored as audio/video tapes to an EIS that has backup and disaster recovery tapes and then destroy the original audio/video tapes. Library and Visitor’s Center can provide assistance and guidance to organizations in determining the historical value of the physical records.
3. To the extent BPA maintains Federal recorded information on other non-digital, machine readable media not previously mentioned, such information must be maintained in accordance with BPA Policy 236-1 Information Governance and Lifecycle Management (IGLM) and the 236 series of BPA policy.
4. Where possible, IGLM encourages organizations to transfer Federal recorded information stored on all non-digital, machine readable media to an EIS that has backup and disaster recovery tapes and then destroy the originals.

9. Performance & Monitoring

A. The IGLM team within Information Governance is the responsible organization for the performance standards and monitoring plans contained in this chapter.

B. Performance Standards

1. Consistency in the organization and use of the agency’s physical media.
2. Inventories of Federal records being stored on physical media and included on organizations’ information asset plans.
3. Documentation of physical media assignments.
4. Reduced duplication and increased accessibility of recorded information by authorized users.

C. Monitoring Plans

1. At least tri-annual review of organizations’ Information Asset Plans.
2. Regular compliance reviews of organization’s recorded information including categorization and captured metadata.
3. Regular (at least annual) disposal of eligible recorded information stored in the Inactive Physical Records Storage room.

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10. Authorities & References

- A. 18 USC 2071: Criminal sanctions for unauthorized removal/destruction of Federal records
- B. 44 USC 3102: Establishing agency programs for management of, effective controls over, and appropriate disposal of records of temporary value
- C. 44 USC 3105: Establishing safeguards against removal/loss of Federal records
- D. 36 CFR 1220-1239: Federal Records Management, general
- E. BPA Policy 236-1: BPA IGLM program authorization

11. Review

The IGLM team within Information Governance is responsible 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

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, sect. 07, cmfrost.
2015-1	2015-07-17	Migration to new BPA policy format.
2016-1	2016-12-09	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. Administrative update. Effective date not updated.

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