



# Directive

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**Subject: PBGC Records Management Program**

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**Directive Number: IM 15-03**

**Originator: WSD**

**ALICE  
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1. **PURPOSE:** This Directive establishes the responsibilities and requirements for the management of Pension Benefit Guaranty Corporation's (PBGC) records and ensures that PBGC complies with Federal laws and regulations, National Archives and Records Administration (NARA) guidance, and the Office of Management and Budget (OMB) Memorandums, related PBGC policies, and best practices for managing records.
2. **EFFECTIVE DATE:** This Directive replaces Directive IM 15-03, Records Management Program dated August 17, 2015. This Directive is effective on the date shown above.
3. **SCOPE:** This Directive applies to all PBGC employees, interns, contractor employees, paper and electronic records created, collected, processed, used, stored, and disposed of by PBGC offices. All organizations collecting or maintaining information or using or operating information systems on behalf of PBGC are subject to the stipulations of this directive. Compliance with this directive must be incorporated into applicable contract or memoranda of agreement under separate cover, as appropriate.

PBGC records management requirements apply to records of all media types, including but not limited to, paper, electronic, web, voice, social media, tapes, and disks. Unless otherwise noted, these requirements apply to all electronic records systems, regardless of storage media, in the network or stand-alone configurations.

This Directive does not supersede any other applicable law, regulation, executive order, or higher-level agency directive or policy guidance.

4. **AUTHORITIES:** The following Federal statutes, regulations, executive orders, and other authorities govern the PBGC Records Management Program.
  - a. Freedom of Information Act ([5 U.S.C. § 552](#))
  - b. Privacy Act ([5 U.S.C. § 552a](#))
  - c. Concealment, Removal and Mutilation of Records ([18 U.S.C. § 2071](#))
  - d. Federal Records Act of 1950, as amended ([44 U.S.C. Chapters 21, 29, 31, 33](#))
  - e. Paperwork Reduction Act of 1995, as amended ([44 U.S.C. Chapter 35](#)).

- f. National Archives and Record Administration (NARA), Records Management Regulations ([36 CFR Chapter XII, Subchapter B](#))
  - g. General Services Administration, Creation, Maintenance and Use of Records, ([41 CFR Part 102-193](#))
  - h. [Presidential Memorandum M-12-18](#): Managing Government Records Management Directive
  - i. [OMB M-14-16, Guidance on Managing Email \(2014\) - PDF.](#)
  - j. [Presidential Memorandum M-19-21, Transition to Electronic Records](#)
  - k. NARA [Universal Electronic Records Management Requirements \(2017\)](#)
  - l. [OMB Circular A-130](#), Management of Federal Information Resources
  - m. Clinger-Cohen Act (Information Technology Management Reform Act – ITRMA), ([Public Law 104-106](#))
  - n. [NARA Bulletin 2013-02](#): Guidance on a New Approach to Managing Email Records [Capstone]
  - o. [NARA Bulletin 2017-02](#): Guidance on Senior Agency Officials for Records Management
  - p. [General Record Schedule 6.1: Email Managed under a Capstone Approach \(2017\)-PDF](#)
  - q. [NARA General Records Schedules](#)
  - r. [PBGC Agency Record Retention Schedules](#)
  - s. PBGC Directive IM 10-07, Controlled Unclassified Information Program (This directive has not yet been approved. A link will be added when approved.)
  - t. [National Archives and Records Administration \(NARA\) Bulletin 2010-05: Guidance on Managing Records in Cloud Computing Environments \(2010\).](#)
  - u. [NARA Bulletin 2014-02: Guidance on Managing Social Media Records \(2014\)](#)
  - v. [NARA Bulletin 2015-02: Guidance on Managing Electronic Messages \(2015\)](#)
  - w. [NARA Criteria for Successfully Managing Permanent Electronic Records, \(2018\) - PDF](#)
  - x. [NARA Guidance on Records Management Language for Contracts \(2019\)](#)
5. **BACKGROUND:** The Federal Records Act of 1950, as amended, requires all federal agencies to make, manage and preserve records containing adequate and proper documentation of their organization, functions, policies, decisions, procedures, and essential transactions. These records, which may exist in a variety of media, are federal property and must be managed according to applicable laws and regulations. The Federal Records Act also requires agencies to establish a records management program, defined as a planned, coordinated set of policies, procedures and activities needed to manage their recorded information management by requiring the transfer of records from federal agencies to the National Archives and Records Administration (NARA) in digital or electronic form to the greatest extent possible.
6. **DEFINITIONS:**
- a. **Capstone.** A simplified and automated approach to managing email, based primarily on the user’s position, rather than the specific content of individual email

messages. Email is retained as permanent records for users designated Capstone officials and retained as temporary records (7 years) for all other email users.

- b. **Capstone official.** The [PBGC senior officials](#) who are responsible for agency and program policy- and mission-related actions. PBGC's Capstone officials are the PBGC Director, Executive Management Committee and their deputies, Chief of Staff, Chief Policy Officer, General Counsel, Inspector General, Participant and Plan Sponsor Advocate.
- c. **Classification.** The grouping of records with common characteristics or that document similar functions.
- d. **Continuity of Operations Plan (COOP).** A written document/plan that provides planning and program guidance for implementing PBGC's Continuity of Operations to ensure PBGC is capable of conducting its essential mission and functions under all threats and conditions. For more information, please see the [Continuity of Operations Plan](#).
- e. **Controlled Unclassified Information.** Information the Government creates or possesses, or that an entity creates or possesses for or on behalf of the Government, that requires safeguarding or dissemination controls pursuant to Executive Order 13526 or the Atomic Energy Act.
- f. **Disposition.** Those actions taken regarding federal records after they are no longer needed to conduct current agency business. These actions include the transfer of temporary records to storage, the transfer of permanent records to NARA, or the destruction of eligible temporary records no longer needed to conduct PBGC business.
- g. **Disposal.** The action taken regarding temporary records after their retention periods expire consisting usually of destruction/deletion.
- h. **Electronic Records Management.** The use of automated techniques to manage records regardless of format. Electronic records management is the broadest term that refers to electronically managing records on varied formats, be they electronic, paper, microform, etc.
- i. **Essential Records.** Formerly known as Vital Records. Indispensable agency records that are needed to meet operational responsibilities under national security emergencies or other emergency or disaster conditions, or to protect the legal and financial rights of the government and those affected by the government's actions.
- j. **Federal Records Center.** Federal storage facility for the economical storage of inactive records operated by NARA.
- k. **File Plan.** A classification scheme for a department's records that includes record or file type; a description of the records; information on the location of the records; and a reference to the approved record series and disposition instructions for each file.
- l. **Freedom of Information Act (FOIA).** Provides individuals with a statutory right of access to certain federal agency records. It requires agencies to disclose requested records unless they are protected from public disclosure by the FOIA.
- m. **Information System.** Discrete set of information resources organized for the collection, processing, maintenance, transmission, and dissemination of information, in accordance with defined procedures, whether automated or manual.

- n. **Information System Owner.** The government official responsible for the overall procurement, development, integration, modification, or operation and maintenance of an information system.
- o. **Legal Hold. Also known as Litigation Hold.** A type of record hold that tolls the records schedule for all records that may relate to a legal action, thus requiring all related records and information to be preserved until the legal hold is lifted.
- p. **Mandatory Schedule of Records.** All federal records maintained for the government by a contractor, must be covered by a NARA-approved agency disposition authority, Standard Form 115, Request for Records Disposition Authority, or the NARA General Records Schedules. (GRS)
- q. **Metadata.** Data describing other data, providing information about a certain item's content. (For example, email metadata includes date sent, subject, recipients, and routing information)
- r. **Non-Records.** Materials that have no documentary value with respect to PBGC's business activities, including reference materials, extra copies of documents kept only for convenience of reference, stocks of publications and processed documents, and library or museum materials intended solely for reference or exhibition.
- s. **Permanent Records.** Records identified by PBGC and NARA as having historical or other value that warrants permanent preservation by NARA beyond the time they are needed for administrative, legal, or fiscal purposes.
- t. **Personal Papers.** Documentary materials belonging to an individual that are not used to conduct agency business. Related solely to an individual's own affairs or used exclusively for that individual's convenience.
- u. **Records.** All information created or received by PBGC employees and contractor employees that is evidence of PBGC's business activities and preserved, or appropriate for preservation, by PBGC. A record can be in any media format (e.g., paper, digital or photo) and should document business activities or decisions. Also, records are defined as either temporary (at some point in time they can be destroyed) or permanent (a record that should be permanently stored at NARA). Reference 44 U.S.C. 3301 for full definition.
- v. **Record Identification.** The act of determining if a document or information meets the threshold of being classified as a record.
- w. **Records Management.** Per 44 U.S.C. Chapter 29, Section 2901, records management is the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, records maintenance and use, and records disposition in order to achieve adequate and proper documentation of the policies and transactions of the federal government and effective and economical management of agency operations.
- x. **Records Management Business Council.** A governance board that addresses records management requirements for PBGC. It is comprised of representatives from across the PBGC and chaired by the Records Officer.
- y. **Records Management Lifecycle.** The lifecycle of a record from the time it is created and identified, through its use and maintenance, until it is transferred to storage or destroyed.
- z. **Records Officer.** The designated responsible person for records management at PBGC.

- aa. **Record Owner.** The PBGC employee or contractor employee, that is responsible for managing the record throughout its lifecycle.
  - bb. **Records Disposition Schedule (also referred to as Records Schedule).** A NARA approved document that provides mandatory instructions for how to handle records no longer needed for government business, including the authority for final disposition of temporary and permanent records. **General Records Schedule (GRS) is a** NARA issued schedule for the retention of common government records (e.g., administrative and personnel records). The GRS defines the retention for these common records.
  - cc. **Retention Period.** The length of time that records are to be kept according to approved Records Schedules.
  - dd. **Social Media Records:** Social media refers to the various activities integrating web technology, social interaction, and user-generated content. Social media includes blogs, wikis, social networks, photo libraries, virtual worlds, location-based services, and video sharing sites. Social media content that meets the definition of a federal record must be managed according to the applicable laws and regulations.
  - ee. **Supporting Documentation.** Documentation that is used to develop, clarify, or update another record. Supporting documentation has value and should be maintained if it provides evidence or clarification of how another record was created or updated.
  - ff. **System Records.** Electronic records created using data from a relational database, such as accounting or procurement systems. A system record comprises data in multiple fields or rows, derived from database tables.
  - gg. **Temporary Records.** Records identified by PBGC and NARA as having insufficient value to warrant permanent preservation by NARA. PBGC's records schedule authorizes their destruction after a specific time or triggering event, unless there is a Legal or Litigation Hold on the records.
  - hh. **Temporary Destruction Log.** A log, created by the Records Coordinator, with the assistance of Record Owners, listing records that are eligible for destruction according to the file plan.
  - ii. **Unlawful or Accidental Removal or Destruction of Records:** Disposal of an unscheduled or permanent record; disposal prior to the end of the NARA-approved retention period of a temporary record (other than court-ordered disposal under §1226.14(d) of this subchapter); and disposal of a record subject to a FOIA request, litigation hold, or any other hold requirement to retain the records. 36 CFR 1230.3
  - jj. **Unscheduled Records.** Records whose final disposition has not been approved by NARA.
7. **POLICY:** PBGC is committed to the creation, maintenance, and disposal of PBGC's records in accordance with all applicable laws, regulations, and Executive Orders. The Records Management Directive is applicable to all federal employees and contractors and applies to all federal records, regardless of media or format.

PBGC shall establish and maintain a records management program that meets the following minimum requirements:

- a. Creates, receive, and maintains official records providing adequate and proper documentation and evidence of PBGC's activities;
  - b. Manages records (irrespective of medium) in accordance with applicable statutes, regulations and agency guidance;
  - c. Maintains records according to the departmental file structure to ensure timely access and retrieval during the required retention period;
  - d. Secures records to protect the legal and financial rights of government and persons affected by government activities;
  - e. Implements a plan to protect essential records and assess damage to, and the recovery of, any records affected by an emergency or disaster; and
  - f. Ensure instructions for the management and disposition of records as specified in the approved records schedules are followed.
8. **RESPONSIBILITIES:** Records Management responsible parties and required actions are listed below.
- a. **Director, PBGC.**
    - i. Establish and maintain an active, continuing program for the economical and efficient management of the records of the agency.
    - ii. Delegates records management oversight to a Senior Agency Official for Records Management (SAORM) with appropriate authority within the PBGC.
  - b. **Chief Management Officer (CMO).**
    - i. Provides executive leadership for PBGC's records management program, policies and related procedures for the creation, use, maintenance, safeguarding, and disposition of records.
    - ii. Works directly, and regularly, with the SAORM and other executive leadership to oversee the successful implementation of the PBGC's records management program.
  - c. **Senior Agency Official for Records Management (SAORM)**
    - i. Sets the vision and strategic direction for PBGC's records management program.
    - ii. Advocates for PBGC's records management program ensuring adequate resources are embedded into the agency's [Strategic Information Resources Management \(IRM\) Plan](#).
    - iii. Ensures that the records management program documents the organization's activities and decisions.
    - iv. Ensures PBGC protects records against unauthorized removal or loss and ensures all agency staff are informed of their records management responsibilities.
    - v. Submits reports to NARA, supporting records management inspections, and other oversight activities.
    - vi. Ensures agency staff are informed of and receive training on their records management responsibilities as defined in NARA regulations and guidance.
    - vii. Formally designates the Agency Records Officer and informs NARA in writing of this decision.
    - viii. Ensures compliance with NARA requirements for electronic records.

- ix. Ensures the agency efficiently and appropriately complies with all applicable records management statutes, regulations, NARA policy, and OMB policy.
  - x. Promotes effective records management at a senior level by seeing across program offices in the deployment of individual IT systems.
  - xi. Coordinate PBGC's records management program with other related disciplines such as information security, risk management, data management, and knowledge management. This may also include programs related to discovery, privacy, and the Freedom of Information Act (FOIA).
  - xii. Integrates the records management program within PBGC's information framework as it develops and matures.
- d. **Records Management Business Council.**
- i. Ensures that the membership includes representatives from all PBGC Departments.
  - ii. Communicates agenda items for action, revision or cancellation, and communicates actions, recommendations and decisions within their departments.
  - iii. Makes recommendations to appropriate authorities and committees as required to achieve Records Management objectives.
- e. **Records Officer.**
- i. Acts as the official liaison with NARA and responds to data calls and mandatory reports.
  - ii. Promotes, executes, implements, and maintains the PBGC records management program in accordance with records management statutes, regulations, NARA policy, and Presidential Directives.
  - iii. Develops standards, procedures, and guidance for improving PBGC's Records Management program.
  - iv. Communicates records management policies and procedures across the PBGC.
  - v. Keeps senior management officials advised of records management activities.
  - vi. Ensures PBGC Records Schedule and NARA's various General Records Schedule (GRS) are current and accurate.
  - vii. Conducts periodic evaluations of PBGC's records management activities and records to ensure compliance and assess its operational, efficiency, and effectiveness of PBGC's records management program.
  - viii. Provides input and guidance regarding to information technology requirements relating to records management:
    1. Records management requirements for all new or updated systems deployed.
    2. Proper retention and disposition of system records in all information systems, including scheduling of systems, as necessary.
    3. Ensure compliance with records management principles and policies in all phases of the Enterprise Performance Life Cycle (EPLC) process.
  - ix. Reviews language in cooperation with the Procurement Department and the Office of General Counsel for the off-site storage of federal records.

- x. Ensures mandatory records management training is conducted and completed annually (initially during the formal on-boarding process and annually thereafter) and refreshes training materials as needed.
  - xi. Facilitates records management Records Coordinator training.
  - xii. Notifies the Archivist of the United States of any actual, impending, or threatened unlawful destruction of records.
  - xiii. Assists PBGC Departments with Records Management activities.
- f. **Office of the General Counsel (OGC).**
- i. Reviews updates to the PBGC Simplified Disposition Schedule (Big Bucket Schedule) for legal sufficiency
  - ii. Provides instructions for implementing legal or litigation holds required to comply with legal requirements.
  - iii. Provides legal advice and counsel to offices and departments on all matters arising in the administration of this Directive.
  - iv. Determines if records can be disclosed based on applicable regulations and Executive Orders.
  - v. Conducts exit briefings for federal employees to include instruction on records management requirements incident to departure.
- g. **OGC/ Disclosure Officer.**
- i. Serves as an initial point of contact for internal and external inquiries pertaining to release of PBGC records and information to Congress, media, public, and governmental and private entities.
  - ii. Ensures that PBGC responses for records and information under the FOIA and Privacy Act are made within statutory and regulatory time limits; and otherwise implements the requirements of the FOIA, Privacy Act, and related Executive Orders and regulations pertaining to the disclosure of PBGC records and information to the Congress, media, public, and other governmental and private entities.
  - iii. Reviews responsive federal records provided by PBGC employees, contractors, interns, and fellows for release to the public under the FOIA.
- h. **OGC/ Privacy Officer (CPO).** Works with the Records Officer to ensure the Records Management program complies with the Privacy Act and safeguards against the disclosure of personally identifiable information (PII) and other privacy-related information.
- i. **Procurement Department (PD).**
- i. Ensures that all PBGC contracts include appropriate records management clauses.
  - ii. PBGC officials responsible for administering contracts must safeguard records created, processed or in the possession of a contractor as required by [36 CFR Chapter XII, Subchapter B, 1222.32](#).
  - iii. Ensures all contractors are aware of and comply with PBGC Records Management Directive
  - iv. Ensures contractor-created records are Federal records are reviewed and transferred to PBGC;
  - v. Coordinates the Records Officer review of contract language for the off-site storage of Federal records.



- vi. Receives and maintains official contract files from Contracting Officer Representatives upon contract closeout.
- j. **Contracting Officer Representatives (CORs).** The responsibilities of Contracting Officer Representatives include, but are not limited to, the following:
  - i. Ensures all PBGC contracts have records management clauses.
  - ii. PBGC officials responsible for administering contracts must safeguard records created, processed or in the possession of a contractor as required by [36 CFR Chapter XII, Subchapter B, 1222.32](#).
  - iii. Ensures all contractors comply with policies and procedures regarding preservation, transfer, and deleting of records.
  - iv. Ensures contractor-created records are federal records and the records reviewed and transferred to PBGC upon contract close-out;
  - v. Ensures a departing contractor's record materials, including email records, have been reviewed prior to the contractor's departure.
- k. **Chief Information Officer (CIO).**
  - i. Ensures that records management requirements are a consideration in the design and development of new systems.
  - ii. Collaborates with the Records Officer and Information Systems Owners to ensure proper retention and disposition of systems records.
  - iii. Collaborates with the Records Officer during the development of records management procedures for the PBGC's web and social media content.
  - iv. Assists the Records Officer in facilitating the management and disposition of web and social media records.
- l. **Information System Owners.**
  - i. In coordination with the departmental Records Coordinators, identifies and applies all approved records and information management procedures and guidelines to all business functions and processes and to system design and development.
  - ii. Assists the Records Officer with access to systems for assessments and evaluations that involve electronic records and systems that generate records.
  - iii. Identifies records created by systems and works with the Records Officer to ensure their retention and disposition.
  - iv. Works with the Records Coordinator to establish and update records schedules for electronic system.
  - v. Ensures that information systems intended to carry out electronic records management align with NARA's and PBGC's requirements for records stored in an electronic recordkeeping system.
  - vi. Maintains electronic information systems in accordance with approved records schedules and NARA requirements.
  - vii. Works with the Records Coordinator and PBGC Records Management team to transfer permanent systems to the National Archives in accordance with approved records schedules and NARA requirements.
  - viii. Ensures that social media content containing official records are maintained in accordance with PBGC's recordkeeping requirements.
  - ix. Works with the Records Officer on system scheduling as needed.

*Note: For a complete list of the Information System Owners (ISOs) contact the Enterprise Cybersecurity Department in the Office of Information Technology.*

- m. **All PBGC Personnel (includes PBGC federal staff and contractors):**
  - i. Creates, identifies, and uses approved metadata tags to tag records.
  - ii. Files records for safe storage and efficient retrieval.
  - iii. Follows the PBGC Records Management Program Directive and related procedures.
  - iv. Uses and manages records in accordance with approved processes and procedures.
  - v. Informs the Records Coordinator of new record types so that retention, storage, and destruction requirements can be assessed and assigned.
  - vi. Completes mandatory records management Training during employee/contractor employee on-boarding process, and annually thereafter.
  - vii. Ensure the safekeeping of federal government records by managing them in accordance with this Directive and their Department's Records Management Procedures Manual.
  - viii. Use official electronic messaging systems to conduct PBGC business.
  - ix. Reports all suspected and actual unauthorized destruction of federal records to the Records Officer.
  - x. Prior to departing, all personnel must comply with policies and procedures regarding preservation, transfer, and deleting of records.
  - xi. Prior to departing, request that the COR, manager, or supervisor review record materials, including email re
- n. **Office of Inspector General (OIG).** The responsibilities of the Office of Inspector General include, but are not limited to, the following:
  - i. Assisting in investigating the unauthorized removal of records or the actual and potential threats to records (e.g., removal, alteration, or deliberate or accidental destruction).
- o. **Department Directors, Managers and Supervisors.**
  - i. Promotes records management practices within their organization in accordance with this Directive and their department's records management procedures.
  - ii. Each department shall designate at least one departmental Records Coordinator.
  - iii. Enforces legal hold restrictions upon notification by OGC.
  - iv. Ensures that the designated essential records inventories are current and complete.
  - v. Ensuring federal employees, contractors, interns, and fellows are aware of and adhere to this PBGC Records Management Directive and their department's Records Management Procedures Manual.
  - vi. Ensuring a departing employee's record materials, including email records, have been reviewed prior to the employee's departure.
  - vii. Ensuring a departing employee complies with policies and procedures regarding preservation, transfer, and deleting of records.
- p. **Records Coordinators.**

- i. Serves as liaison with the Records Officer on records management items affecting their department.
- ii. Ensures records management requirements are considered for the development of departmental systems (new or enhancements of existing systems).
- iii. Coordinates with the Records Officer for the transfer of records to and from offsite records storage facilities and NARA.
- iv. Ensures the departmental file plan, procedures, and record inventory is accurate for all records for which the department is the custodian or office of record.
- v. Ensures that departmental federal employees and contractor employees understand the requirements for record creation and identification.
- vi. Attends biannual records coordinator training,
- vii. Works with the Records Officer on scheduling of new record types created by their department.
- viii. Assists the Records Officer in establishing protection against the unlawful destruction or removal of records from PBGC by current or departing officials, employees, or contractors.

9. **PROCEDURES:**

[PBGC Records Management Intranet Site](#) provides the latest records management guidance and procedures regarding:

- a. **Creating and Capturing Federal records:** PBGC shall create and capture all federal records, by following policy/procedure to:
  - i. Identify records received or created.
  - ii. Ensure the record remain reliable, accessible and usable.
  - iii. Ensure record content documents PBGC actions, decisions, and related work activity.
  
- b. **Records Lifecycle:** All PBGC records must be managed throughout the records lifecycle, which includes creation, maintenance and use, and disposition. The records lifecycle ensures records remain retrievable and accessible in a site or electronic system your department or workgroup has access to throughout the retention period. The records lifecycle maintains records in a manner that preserves the overall integrity of the record during the normal course of business. The records lifecycle ensures records are stored when they are no longer needed for business purposes, to meet legal, regulatory, and retention requirements.
  - i. **The records lifecycle must account for all record types:** Permanent Records, Temporary Records, Essential Records, and records in all media formats.
  - ii. **Personal papers/non-records:** Personal papers must be clearly designated and maintained separately from all Federal records. If information about private matters and agency business appears in the same document, the document is considered a federal record.

c. **Records Organization**

i. **NARA Universal Electronic Records Management (ERM) Requirements:**

Baseline ERM program requirements derived from existing statutes, standards, NARA regulations, policy, and guidance. They are a starting point for agencies to use when developing system requirements. The Universal ERM requirements contains a change log, abstract, list of lifecycle requirements, list of transfer format requirements, and a glossary.

ii. **Record Organization:** Records must be maintained so that they are easily retrievable. Records must be organized and indexed in a manner that permits the access and retrieval of the records in an effective and efficient manner.

iii. **Record Retention Schedules:** PBGC federal records must be managed in accordance with records schedules approved by the Archivist of the United States. Unscheduled records must not be destroyed. Approved PBGC schedules can be found on [PBGC Records Management Intranet Site](#).

iv. **Unscheduled Records:** Unscheduled records are records not covered by a NARA-approved records retention schedule. Unscheduled records must not be destroyed and treated as permanent until a final disposition is approved. Proposed records retention schedules for unscheduled records should be submitted to Records Management team for further action.

v. **Safeguarding Records:**

1. Safeguarding Records containing sensitive and Personally Identifiable Information (PII)

2. **Safeguarding Controlled Unclassified Information (CUI):** Controlled Unclassified Information (CUI) must always be safeguarded in a manner that minimizes the risk of unauthorized disclosure while allowing timely access. PBGC shall take reasonable precautions to guard against unauthorized disclosure of, or access to, CUI in both physical and electronic environments. Physical safeguards may include establishing and using controlled environments or protecting CUI with a physical barrier.

d. **Administrative Management of Records:**

i. **Records Management Reviews:** PBGC's Records Management Program conducts regular reviews of departmental file plans using a standardized evaluation tool.

ii. **Records Management Training:** PBGC staff are required to complete annual mandatory records management training.

iii. **File plans:** Each department must maintain a file plan, which is a comprehensive listing that identifies the types of records created and maintained. The file plan should include detailed information such as the title, description of its records, records owner or creator, location of records, including electronic media. The file plans are required to be reviewed, updated and certified, at a minimum annually, by the Department Directors.

iv. **Departing Staff:** When leaving PBGC, federal employees and contractors need to take steps to ensure all federal records are properly managed and preserved until their authorized disposition. Federal records must be maintained under the control of the Government. Employees generally may

take extra copies of federal records that are already publicly available, subject to Department Director approval. Any removal of information is subject to review by PBGC. Contact the Records Management Program for guidance prior to departure.