



1. **PURPOSE:** This directive establishes Transportation Security Administration (TSA) policies and procedures for a unified [Records Management Files Classification System](#) (RMFCS) for organizing and identifying files or documents to speed the retrieval, use and disposition of TSA records.
2. **SCOPE:** This directive applies to all TSA employees, contractors, and program offices.
3. **AUTHORITIES:**
 - A. Public Law 107-71, The Aviation and Transportation Security Act
 - B. Title 44 United States Code, Chapters 21, 29, and 33, The Federal Records Act
 - C. 36 Code of Federal Regulations, Parts 1220-1238, National Archives and Records Administration Regulations
 - D. Office of Management and Budget Circular No. A-123 – Management Accountability and Control
 - E. Office of Management and Budget Circular No. A-130 – Management of Federal Information Resources
 - F. 36 Code of Federal Regulations, Part 1222.44, Directives documenting agency programs, policies, and procedures
 - G. Management Directive 0550.1, Records Management, U.S. Department of Homeland Security
 - H. Management Directive 200.7, Records Management, TSA
4. **DEFINITIONS:**
 - A. Case Files: Records, regardless of media, documenting a specific action, event, person, place, project or other matter. Also includes personnel, project and transaction files, which are types of case files.
 - B. Copy: A reproduction of the contents of an original.
 - C. Comprehensive Records Schedule: A schedule or collection of schedules based on National Archives and Records Administration's (NARA's) approved disposition authorities and issued as a directive or manual to cover all records of an agency. Also includes instructions for nonrecord materials, whose disposition is based on agency needs. *See also Records Schedule.*
 - D. Correspondence: Letters, postcards, memoranda, notes, electronic mail (i.e., e-mail), and any other form of written communications that are sent or received.

- E. Custody: Guardianship, or control, of records, including both physical possession (physical custody) and legal responsibility (legal custody), unless one or the other is specified.
- F. Cutoff: Breaking, or ending, files at regular intervals, usually at the close of a fiscal year (September 30th) or calendar year (December 31st), to permit their disposal or transfer in complete blocks and, for correspondence files, to permit the establishment of new files.
- G. Electronic Records: Records stored in a form that only a computer can process.
- H. Files: A collective term usually applied to all records and nonrecord materials of an office or agency. **Attachment 1** provides the types of files created and maintained by an agency.
- I. File Codes: Numbers used to identify program office files, file types or categories.
- J. Files Custodian: The individual(s) or office assigned and designated as accountable for the review, control and management of agency files, either as a functional duty or collateral assignment. Also referred to as Records Custodian or Records Liaison.
- K. Files Management: Applying records management principles and techniques to filing practices in order to organize and maintain documentary materials properly, retrieve them rapidly, and ensure their completeness. Also referred to as Files Maintenance.
- L. File Plan: A document containing the identifying number, title or description, and disposition authority of files held in an office. The file plan consists of the RMFCS and the Records Disposition Schedule.
- M. File Station: Any location in an organization where records are maintained.
- N. Filing System: A set of policies and procedures for organizing and identifying files or documents to speed their retrieval, use and disposition. Also referred to as Recordkeeping System.
- O. Nonrecord Materials: U.S. Government-owned informational materials excluded from the legal definition of records or not meeting the requirements of that definition. Also includes extra copies of documents kept only for convenience or reference, stocks of publications and of processed documents. *See also Records*. **Attachment 2** provides examples of nonrecord materials.
- P. Official Messages: Comprises non-electronic (e.g., letters, memoranda, notes, postcards) and electronic messages (e.g., Official e-mails and instant messages) intended to communicate decisions, provide direction, convey guidance, or authorize action in the interest of and on behalf of the agency. Official messages are typically authored or authorized by, or on behalf of, the Assistant Secretary or his designated executive staff (e.g., Deputy Administrator, Chief of Staff, Assistant Administrators, Key Office Directors), or delegated program office representatives in the management chain (e.g., deputies, senior staff officers and assistants, program managers).

- Q. Records: All books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the U.S. Government under Federal law or in connection with the transaction of public business and 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. *See also Nonrecord Materials.*
- R. Records Schedule: A document providing mandatory instructions for what to do with records (and nonrecord materials) no longer needed for current Government business, with provision of authority for the final disposition of recurring or nonrecurring records. May also be referred to as a disposition schedule, records control schedule, records retention and disposition schedule, or schedule. Also, includes the *Request for Records Disposition Authority* (i.e., Standard Form 115), the NARA General Records Schedules, and TSA's [Records Disposition Schedules](#), which when completed becomes a comprehensive records schedule that also contains agency disposition instructions for nonrecords materials.

Note: All records schedules must be approved by NARA.

5. RESPONSIBILITIES:

- A. The Office of Information Management Programs (OIMP) is responsible for:
- (1) Establishing and maintaining procedures for an effective RMFCS.
 - (2) Reviewing and updating annually the RMFCS to ensure that files common to all offices are all classified using the same file codes.
 - (3) Reviewing and updating annually the RMFCS to ensure that it is consistent with the established comprehensive records retention/disposition schedules.
 - (4) Processing requests for changes or additions to the RMFCS.
 - (5) Reviewing and updating annually the RMFCS to ensure that it is consistent with the Management Directive system.
 - (6) Reviewing and updating annually this directive to ensure that it is current and consistent with the Correspondence Manual.
 - (7) Providing guidance to TSA officials to ensure reasonable uniformity in files management activities throughout the agency.
 - (8) Training Files Custodians and/or other staff as necessary to carry out the RMFCS program.
 - (9) Cultivating professional relationships, as needed, with Files Custodians and other staff/program offices, and agencies to carry out the RMFCS program.

- (10) Providing copies of RMFCS-related directives to NARA, and coordinating other program activities covered under [TSA MD 200.7, Records Management](#).
- B. The Executive Secretariat is responsible for:
- (1) Establishing and maintaining procedures for placing the file codes on letters, memoranda, controlled correspondence, and official e-mail.
 - (2) Reviewing and updating the Correspondence Manual periodically to ensure its consistency with the Records Management Directive regarding the RMFCS.
- C. Each TSA organizational element is responsible for appointing at least one Files Custodian who is responsible for:
- (1) Overseeing the files management program in cooperation with OIMP.
 - (2) Providing information and support to OIMP to implement the program.
 - (3) Providing systematic use of primary, secondary and tertiary file codes on correspondence according to established Records Management policy and procedures. Detailed information on filing procedures is located under Chapter 3, Filing Procedures, in TSA's [Records Management Policy Manual](#).

6. POLICIES AND PROCEDURES:

A. Policies:

- (1) The RMFCS must be used as the basis for management and control regarding the storage, retrieval and disposal of agency records. Follow the authorities in the records schedules for retention and disposal of record material.
- (2) A reader's reference copy is considered an "informational" correspondence only. Informational correspondence has a shorter retention period than the author's originating correspondence. Therefore, refer to applicable retention schedule(s) for disposition of reference copies. Neither secondary nor tertiary numbers are required on reference copies.
- (3) Each office must manage its filing system to ensure all official records are stored and retrieved efficiently, and in a timely manner in compliance with procedures in this directive.
- (4) Each office must carefully follow instructions for filing to ensure adequate standardization of filing practices at each organizational element. Each office must use the file designations in the RMFCS for correspondence and filing. **Headquarters and field offices cannot publish different RMFCS (or retention periods).** Changes to the RMFCS must be coordinated through the OIMP staff. Offices must submit a memorandum to the Director of OIMP with justification for changes. OIMP will review the justification and then coordinate with NARA if it is determined a new records retention schedule or item is necessary. OIMP

will take appropriate action to notify requestors of denials and approvals before any final action is taken and published; i.e., amendments to the RMFCS.

- (5) The type of RMFCS used is a hierarchical RMFCS. The system is organized by concrete, abstract or functional words, or by project or case number, or a combination of these. It must be:
- a. Representative of informational needs. The classification must conform to users' requirements. The kinds of records users need, the way users request them, and the terms used to request records shape the files classification system.
 - b. Logical. Subjects must be grouped in a clearly logical order so that the reasons for the arrangement will be easily obvious to the users.
 - c. Precise. Each subject title must be precise in describing the category, thereby encouraging filing at the lowest possible step on the hierarchical ladder, if volume requires.
 - d. Restrictive. Each subject title must be phrased to be as exclusive of others as possible. Use only one term to denote a subject, no matter how many synonyms may express the same idea.
 - e. Complete. There must be suitable categories for all existing and anticipated records.
 - f. Flexible. There must be a way of contracting or expanding the classification outline to allow subjects to be dropped or added as necessary.
- (6) File codes will be used to properly mark and identify all record and nonrecord materials. Subject or title information will also be added to further define and describe the file. There are three (3) general categories of materials to consider.
- a. Non-electronic correspondence (e.g., letters, memoranda, notes, postcards): File codes will be marked in the lower left-hand corner on the document's first page; e.g., "File: 100.1". For current guidelines, reference the Executive Secretariat's [Correspondence Manual](#). **Attachment 3** provides an example of how to mark a document using a file code.
 - b. Electronic correspondence (e.g., Official e-mails or instant messages): File codes will introduce the "Subject" line, followed by the primary subject category in all caps, and then a brief description of the issue (e.g., [Subject: 200.1.3 – RECORDS MANAGEMENT, Files Classification Guidance])
 - c. Resource materials (e.g., books, compact disks, pamphlets, photographs): File codes will be marked on a label using the same conventions (i.e., file code, category, description) identified for electronic correspondence, in addition to the use of an issue date using a month, day and year format (i.e., mm/dd/yy). Care must be taken to ensure that the label is affixed securely in an obvious, but non-

intrusive manner, to help avoid compromising the presentation or content of the material.

B. Procedures:

- (1) The RMFCS is a numeric code filing system that serves as the primary guide for TSA files management. Under this system, the program offices are represented numerically (e.g., 100 – Administrator/Deputy Administrator/Executive Secretariat, 200 – Administration, 300 – Acquisitions, etc.), with secondary and tertiary number codes (e.g., 200.2, 300.4.5-a) used to further identify specific files and file types under respective program offices.
- (2) The subjects are arranged in a hierarchical system where records pertaining to a particular subject are arranged under primary categories and then, as necessary, under secondary and tertiary subdivisions.
 - a. Filing classification. Classifying records involves the ability to select the most appropriate subject classification, to recognize related subject matter of sufficient importance to warrant cross-referencing, and to distinguish between papers that belong in subject and case files.
 - (i) Classifying subject file material. Papers to be filed in subject files are marked in the lower-left corner using the most appropriate file code taken from the numeric codes described under Appendix D, Files Classification System, in TSA's [Records Management Policy Manual](#). The following techniques are used in selecting the correct subject file classifications.
 - Note the addressee and/or originator. The identification of either may help to establish the subject area with which the document is associated.
 - Read the subject line, if any, to help define the subject matter.
 - Look for key phrases or familiar terms used in the text and check these against the alphanumeric codes to help specify the subject matter.
 - (ii) Classifying case file material. Papers are marked in the same manner as the subject material. However, not all papers for case files need to be marked. Certain forms and reports used in personnel, fiscal, and other operations show numbers, names and other identifying characteristics that are self-classifying, and need no further identifying markings to ensure that they are correctly filed. If a document is filed in a case file folder, underline the case file identification in red or blue, or otherwise mark the same in an easily identified manner (e.g., highlight) where it first appears in the document.
 - (iii) Classification review. Files Custodians are responsible for reviewing and correcting, as appropriate, file codes before filing to ensure that they are accurate.

- b. Cross-referencing. Cross-referencing offers a complimentary filing method, based on related subject matter, when the author's file code has clear application and relevance to one of the reader's file code designations. NOTE: Cross-referencing is to be used judiciously in addition to the primary filing, but not as an alternative or replacement for the primary.
- (i) Cross-reference markings. Use cross-reference labels on file folders where two files are frequently used in conjunction with each other despite being separate file codes.
 - (ii) Cross-reference tracking. Cross-reference records by documenting the appropriate information requested on the [TSA Form 224, Cross-Reference Log](#). The Log is intended to provide a readily accessible and easy-to-use inventory for files cataloged under a respective file folder. When cross-referencing a file, place the appropriate file with a note to the Log indicating relevance to another file code site other than its primary file code marking. The use of the form is optional, and its application should be limited only to those records requiring cross-referencing to another file for significant reasons. NOTE: Avoid excessive cross-referencing (more than two) other files for any one file to reduce retrieval complications.
- (3) To ensure standardization for program records, all offices must arrange program records, according to the RMFCS. Primary file codes (e.g., 100, 200, 300, etc.) and file locations must be established and used by all offices. However, secondary and tertiary file codes (e.g., 100.1, 200.3.5, 300.10.1-a, etc.) are only required for the program office having the programmatic scope and responsibility for those particular files.
- (4) Marking and filing primary records: The author of the record (i.e., initiating office) will use the RMFCS to identify and assign the appropriate file code. Records will be marked in the lower left-hand corner, on a label, or in the "Subject" line, as appropriate, based on the medium used.

Example a-1: The Office of Aviation Operations (AVO) prepares and disseminates a memorandum concerning the professional development and training of Federal Security Directors (FSDs). AVO will code the memorandum as 1900 in the lower left-hand corner of the document's first page using the established primary classification and numeric code for the Office of Workforce Performance and Training (WPT); i.e., "FILE: 1900". Code 1900 is consistent with WPT, and WPT has the scope and responsibility for professional development and training. AVO will file the memorandum locally under their 1900 file folder. Upon receipt of the memorandum from AVO, WPT will verify the coding and file it to 1900 under the approved and appropriate secondary or tertiary code; e.g., 1900.1.4 for Professional Development. AVO and other non-WPT offices will file it under 1900.

Example a-2: The Office of Human Resources (OHR) prepares and disseminates an internal message via e-mail concerning the merit promotion process for Transportation Security Screeners (TSSs) in the airports. OHR will code the "Subject" line using the approved and appropriate secondary or tertiary number, if applicable; e.g., 1100.2.1 for Merit Promotion. OHR will also add a brief category title and description of the message. The e-mail may read something similar to,

[Subject: 1100.2.1 – MERIT PROMOTION, Transportation Security Screeners]. In this example, code 1100.2.1 is consistent with OHR and merit promotion for TSS positions, and merit promotion falls under the scope and responsibility of OHR. Upon receipt of the e-mail from OHR, AVO will verify the coding and file/save it to their local 1100 file, as will all other non-OHR offices that retain the record.

Example a-3: The Office of Security (SEC) prepares and forwards a compact disc (CD) to the Office of Internal Affairs and Program Reviews (IAP) regarding Freedom of Information Act (FOIA) requests concerning maritime shipping security. SEC will prepare a label and code it with the approved and appropriate secondary or tertiary number; e.g., 2800.7.2-b. SEC will also add a brief category title and description of the CD's contents, and an issue date for the CD using a month, day and year format (i.e., mm/dd/yy). The label may read something similar to, [Subject: 2800.7.2.b – FOIA REQUESTS, Maritime Shipping Security, 11/19/04]. In this example, code 2800.7.2-b is consistent with SEC and FOIA requests for maritime that are part of an IAP review, and FOIAs fall under the scope and responsibility of SEC. Upon receipt of the CD from SEC, IAP will verify the coding and file it to their local 2800 file, as will other non-SEC offices. **However**, if the CD becomes part of an IAP file as an attachment to the IAP program review record, it could thereby be filed with the entire case file under an approved and appropriate IAP 1200 code; e.g., 1200.4.1 for program reviews of maritime security operations.

- (5) Marking and filing cross-reference records: The readers of the correspondence or record (i.e., recipients) will first place the correspondence received from the author in the applicable primary file folder consistent with the approved and appropriate file code. Still, the reader may elect to maintain a cross-reference copy under an approved and appropriate file code by using a Cross-Reference Log to note both its physical location and its primary reference file location. Caution should be taken to ensure excessive cross-reference copies do not exist.

Example b-1: Referencing 6B(4) *Example a-1*, AVO will file the memorandum locally under 1900, and they may also cross-reference it to an approved and appropriate 400 code locally if one exists; e.g., 400.7.1 for FSD issues. Other non-WPT program offices that must/may retain the memorandum will file it under 1900 and may cross reference it locally as well, if appropriate.

Example b-2: Referencing 6B(4) *Example a-2*, OHR will file the message using 1100.2.1, and AVO will file the memorandum locally under 1100. AVO may also cross-reference the e-mail locally to an approved and appropriate 400 code if one exists; e.g., 400.7.2 for TSS issues. Other non-OHR program offices that must/may retain the e-mail will file it under 1100 and may cross reference it locally as well, if appropriate.

Example b-3: Referencing 6B(4) *Example a-3*, SEC will file the original records that are copied to the CD using 2800.7.2-b, and IAP will file the CD locally under 2800 if the CD is filed as a stand alone reference. However, if IAP uses the CD as part of a larger case file, the CD would be filed with the case file using 1200.4.1. IAP could

then cross-reference, as an option, the CD's physical location in their 1200.4.1 file back to their local 2800 under the SEC file using the Log.

7. EFFECTIVE DATE AND IMPLEMENTATION:

This policy is effective immediately upon signature.

APPROVAL



1/28/05

Date

Robert W. Gardner
Assistant Administrator for Finance and
Administration/Chief Financial Officer

Filing Instructions:	File with OIMP Management Directives
Effective Date:	January 28, 2005
Review Date:	January 30, 2008
Distribution:	TSA Employees, Contractors and Program Offices
Point Of Contact:	CAO/OIMP, Lawan Jackson, 571/227-2068

AGENCY FILE TYPES

The following are types of files created and maintained in an agency.

File. An accumulation of records or nonrecord materials arranged according to a plan. See definition of records and nonrecord materials in Management Directives 200.7 and 200.8.

General Correspondence or Subject Files. Establish files for correspondence and documents on a general subject at the beginning of each fiscal year. Set up additional folders behind a primary, secondary, or tertiary files classification when additional subject breakdowns are needed.

Creating Secondary and Tertiary Folders. Do not use primary file folders for filing all records on the same topic. Use secondary and tertiary files to segregate program records when they have long retention periods or have been approved for permanent retention by the National Archives and Records Administration (NARA). File secondary and tertiary material in the primary file folder only if the volume of material is low and the retention periods are the same.

- Many *case files* are at the secondary and tertiary levels. Do not establish active case files each year, but bring them forward with the current year's files. The disposition period begins after the case file is closed (see definition of case files in MD 200.8).
- Create case files behind correspondence or subject files if there are enough records on a particular aspect of a general subject. The disposition period is the same as the general subject file and begins after the case file is closed.
- Material in a case folder in the originating office need not be considered case file material in the receiving office.
- The file plan often provides specific instructions for case files, such as contracts. Otherwise, arrange case files alphabetically, numerically, or by project, name, airport, and so on.
- Set up a second folder if material becomes too bulky ($\frac{3}{4}$ to 1 inch thick) for one folder. Label the folders to indicate inclusive dates of the material and file the most recent folder in front (for example, file a folder for May 1, 2003 to September 30, 2003, in front of one for October 1, 2003, to April 30, 2003).
- Do not remove individual items from case files. Fasten material securely inside the folder. Use the entire folder for filing and charging out individual cases.
- Properly label case folders when they are activated and closed.
- Mark "closed" and the fiscal year of closure on closed case folders. Separate closed cases from active cases in the files.

Inquiry Files. Files used for standard replies, such as acknowledgments, general information, answers to routine congressional requests, form letters, and other correspondence not requiring research or staff work. Destroy these documents after 3 months. Do not use inquiry files for legal, historical, or administrative records or for records having continuing value. Most program file plans have at least one inquiry file.

Reader Files. Nonrecord material used to circulate copies of outgoing communications to advise staff members of important developments and decisions.

Maintaining Official Files. File records material that originates in the office. Avoid filing information copies except those that (1) contribute to carrying out program activities office operations or (2) require a response.

TSA MANAGEMENT DIRECTIVE No. 200.8
RECORDS MANAGEMENT FILES CLASSIFICATION SYSTEM

- File material on a regular basis.
- Attach the incoming letter and enclosures together.
- Remove the incoming envelopes.
- Remove paper clips, pins, and rubberbands.
- If not indicated, write the file code in the upper right-hand corner.
- Avoid filing nonrecord and record material in the same folder

Folders. Oxfords folders and dividing tabs (11-point weight, straight cut, with or without reinforced tops) meet most filing requirements. When a folder becomes $\frac{3}{4}$ to 1 inch thick, prepare a new one, file in front of the old one, and indicate the dates covered on the folder.

SEPARATING NONRECORD FROM RECORD MATERIAL

Do not combine nonrecord material in file folders with records material. See definitions in Management Directives 200.7 and 200.8. If filing is necessary, place the material in separate, temporary, or transitory folders separate from official files, and, in general, dispose of them on a regular basis.

1. Some examples of Nonrecord Materials are:
 - a) Information copies of correspondence and other papers not requiring administrative action.
 - b) Reading file copies of correspondence.
 - c) Duplicates of documents or printed materials maintained in the official file.
 - d) Superseded manuals and directives outside the office responsible for retention.
 - e) Document of agency activities, such as employee welfare organizations and charitable fund drives.
 - f) Routing slips and transmittal sheets.
 - g) Working papers not needed to document project activity.
 - h) Drafts of reports and correspondence.
 - i) Blank forms.
 - j) Transcribed stenographic materials.
 - k) Materials received from an originating office or activity already required to maintain record copies.
 - l) Catalogs, trade journals, and other publications or papers from Government agencies, commercial firms, or private institutions not requiring action and not part of a case for which action is taken.
 - m) Library and museum material, extra copies of documents, and stocks of publications made or acquired for reference or exhibition purposes.
 - n) Correspondence and other records of short-term value.
 - o) Reproduction materials, such as stencils, hectograph masters, and offset plates.
 - p) Electronic messages of short-term interest with no documentary or evidential value, which do not require administrative action. This includes messages concerning agency activities, informal messages from one employee to another, default messages, and so on.
2. Nonrecord material, which may acquire record status. Materials normally considered nonrecord may acquire record status because they clarify a matter being documented.
3. Information copies, which may have record status. Copies circulated to other offices or agency levels for information purposes may acquire record status when they contribute significantly to staff in carrying out program activities or office operations. File such information copies in the official files and apply the retention period.
4. Personal Papers. Individuals who keep private, non-official papers at the office shall clearly designate them nonofficial and file them separately from official records. In cases where portions of private personal correspondence pertain to official business, extract those parts and put them in the official files. Personal papers may be disposed of without special authority or approval after they have served their purpose.

EXAMPLE - CODING FILE DOCUMENTS

U.S. Department of Homeland Security
Arlington, VA 22202



Transportation
Security
Administration

The Honorable John Doe
United States Senate
Washington, D.C. 20510

Dear Senator Doe:

Thank you for your letter of November 19, 2004, supporting the development of Management Directive (MD) 200.8, *Records Management and Files Classifications System*.

The Transportation Security Administration issued MD 200.8 following considerable vetting. Development and revisions occurred over several weeks, and included coordination with the National Archives and Records Administration (NARA).

An identical response has been sent to the National Archivist at NARA. If your staff needs further information or assistance, they are requested to call the Office of Information Management Programs, at (571) 555-1234.

Sincerely yours,

Assistant Secretary

File: 100.1