



To enhance mission performance, TSA is committed to promoting a culture founded on its values of Integrity, Innovation, and Team Spirit.

REVISION: This revised directive supersedes TSA MD 200.9, *Vital Records Program*, dated August 29, 2005.

SUMMARY OF CHANGES: Clarification added to Sections 3, *Authorities* and 4, *Definitions*; additional responsibilities and reassignment of responsibilities have been made to Section 5, *Responsibilities*; the term “Files Custodians” has been changed to “Records Custodians” throughout; revisions to the coordination and review process for Vital Records Plans have been made to Section 7, *Procedures*; and the “Vital Records Types” attachment was removed.

1. **PURPOSE:** This directive provides TSA policy and procedures for identifying, preparing and inventorying vital records and managing their transfer, maintenance and disposition under an agency Vital Records Program.
2. **SCOPE:** This directive applies to all TSA employees, contractors and program offices with vital records responsibilities.
3. **AUTHORITIES:**
 - A. EO 12656, Part 1, Section 202, Assignment of Emergency Preparedness Responsibilities, November 18, 1988, as amended
 - B. 36 CFR, Part 1236, Management of Vital Records, revised July 1, 2003
 - C. 44 USC, Chapter 3101, 3102(2), and 3103
4. **DEFINITIONS:**
 - A. Approving Official: A senior management official designated by the head of TSA, or his/her designee, with authority to approve actions for a TSA Headquarters (HQ) Office (i.e., Associate Administrator, Assistant Administrators or equivalents).
 - B. Continuity of Operations (COOP): A planning effort and supporting programs designed to assure that the capability exists to continue essential agency functions in the event of an emergency; including management of records essential for agency operations that are protected and accessible in the event of an emergency.
 - C. Disaster: An unexpected occurrence inflicting widespread destruction and distress and having long-term adverse effects on agency operations. Each agency defines what a long-term adverse effect is in relation to its most critical program activities.

- D. Emergency: A situation or occurrence of a serious nature, developing suddenly and unexpectedly, demanding immediate action, and which is generally of short duration (e.g., interruption of normal agency operations for a week or less involving electrical failure or minor flooding caused by broken pipes).
- E. Emergency Operating Records: Vital records essential to the continued functioning or reconstitution of an organization during and after an emergency, which include: emergency plans and directives, Orders of Succession, Delegations of Authority, staffing assignments, selected program records needed to continue the most critical agency operations, as well as related policy or procedural records that assist agency staff in conducting operations under emergency conditions and for resuming normal operations after an emergency.
- F. Legal and Financial Rights Records: Vital records essential to protect the legal and financial rights of the Government and of the individuals directly affected by its activities (e.g., accounts receivable records, Social Security records, payroll records, retirement records, insurance records, legal records concerning ongoing litigation, contractual obligations and similar records).
- G. Office: A major TSA organizational element headed by an Approving Official with delegated authority and assigned scope and responsibility for subordinate program offices.
- H. Program Office: Also referred to as a functional area, a subordinate element of an office.
- I. Records Liaisons: Individuals appointed via [TSA Form 230, Records Liaison Appointment](#), to the collateral-duty, records management position under the technical direction of the agency Records Management Officer. The positions include Records Management Leads, Records Custodians, and other similarly designated positions authorized by the Records Management Officer.
- J. Vital Records: Essential agency records necessary to meet operational responsibilities under national security emergencies or other emergency or disaster conditions (i.e., emergency operating records), or to protect the legal and financial rights of the Government and those affected by Government activities (i.e., legal and financial rights records).
- K. Vital Records Plan: Document identifying an organization's vital records and providing information sufficient to properly account for and ensure that those records are available during a disaster or emergency.
- L. Vital Records Program: The compilation of agency policies, procedures, forms, plans and associated documents and resources necessary to effectively identify, use and protect vital records.

5. RESPONSIBILITIES:

- A. The Assistant Secretary is responsible for establishing and maintaining an agency Vital Records Program to safeguard TSA vital records.

B. Approving Officials are responsible for:

- (1) Ensuring office compliance with and accountability for the Vital Records Program.
- (2) Ensuring the appointment of a Records Management Lead and supporting Records Custodians using TSA Form 230, as appropriate.
- (3) Safeguarding vital records pursuant to an approved Vital Records Plan.
- (4) Coordinating the transport of non-emergency records (i.e., legal and financial rights records) at off-site locations.

C. Office of the Chief Counsel (OCC) is responsible for providing legal review of vital records identified by program offices to ensure the legal rights and interests of individual citizens and the Government are protected.

D. Office of Law Enforcement/Federal Air Marshal Service (OLE/FAMS) is responsible for:

- (1) Providing coordination, oversight and direction to safeguard classified and Sensitive but Unclassified (e.g., Sensitive Security Information, For Official Use Only) information at COOP sites.
- (2) Providing emergency preparedness guidance, oversight and direction sufficient to support the Vital Records Program.
- (3) Ensuring that emergency operating records are available at TSA COOP sites, and that all emergency operating records secured at other off-site locations are appropriately safeguarded against unauthorized access.
- (4) Coordinating or providing for, as necessary, appropriate transport of emergency operating records bulk shipments and their secure storage at TSA COOP sites.

E. Office of Operational Process and Technology (OPT) is responsible for:

- (1) Providing information technology (IT) support sufficient to support the effective and efficient production, storage, maintenance and retrieval of vital records in electronic formats.
- (2) Providing technical advice and guidance by reviewing and assessing the hardware and software required to support the Vital Records Program.
- (3) Taking steps to eliminate IT vulnerabilities that could threaten agency vital records.
- (4) Procuring, installing, and upgrading, as appropriate, IT systems, software and equipment sufficient to support the Vital Records Program including the implementation of redundant IT systems.

F. Office of Information Management Programs is responsible for:

- (1) Developing and coordinating reviews of the Vital Records Program policy and procedures.
- (2) Assisting and advising HQ Offices in identifying vital records necessary for implementation of their respective emergency operations plans.
- (3) Conducting periodic evaluations and reviews/audits of the Vital Records Program.
- (4) Providing technical direction to records liaisons.

G. Business Management Office (BMO) Directors are responsible for:

- (1) Managing and interacting with appropriate BMO staff, HQ Office contacts, and other TSA personnel necessary to support records management policy, procedures, requirements and standards.
- (2) Ensuring qualified records liaison are appointed and trained to ensure timely and effective records management support and oversight.

H. Records liaisons are responsible for:

- (1) Ensuring proper Vital Records Plan documentation and identification of vital records.
- (2) Collecting, properly securing and maintaining a master set of Federal and TSA directives, handbooks, the Vital Records Plan, forms and other issuances, administrative and technical, pertinent to their HQ Offices.
- (3) Leading and coordinating reviews, determinations and inventorying of vital records.
- (4) Completing applicable records management training, briefings and other activities, as directed/required, within the time and manner prescribed.
- (5) Effectively communicating records liaison roles and responsibilities to their respective HQ Office staff.
- (6) Reviewing and submitting appropriate forms and documentation related to records management and the Vital Records Program to the Records Management Officer.
- (7) Ensuring proper coordination for the collection and transfer of vital records to the TSA COOP sites or other appropriate off-site locations in a timely manner.
- (8) Conducting periodic inventories of vital records and updating the Vital Records Plan and coordinating with the Records Management Officer as necessary.

6. POLICY:

- A. Offices shall comply with and support the Vital Records Program, and ensure that their respective emergency operating records and legal and financial rights records vital to the continuity of essential TSA activities are properly identified, safeguarded and accessible.
- B. Offices shall review, update and revise their Vital Records Plans by completing the appropriate Vital Records Program forms in a timely manner, as needed, and not less than annually, subject to periodic audits by the Records Management Officer and other appropriate officials.
- C. Offices shall ensure that vital records are evaluated on the basis of their essentiality in carrying out emergency operations or in protecting the rights and interests of citizens and Government and not based on their value as permanent records.

NOTE: The records must be available and sufficient enough so that anyone at the TSA COOP sites or other off-site locations can appropriately access and interpret the information and not just accessible for those individuals who would generally use them.

- D. Offices shall ensure that their vital records are preserved, catalogued, and easily retrievable in usable condition in the appropriate medium for ready access at the TSA COOP sites or other appropriate off-site locations.
- E. Offices shall coordinate with the Records Management Officer when transferring emergency operating records and legal and financial right records to the TSA COOP sites or other appropriate off-site locations.
- F. Offices shall consider the informational content of records series and electronic records systems when identifying vital records such as emergency plans and related records, and those records that would be needed to continue operations and protect legal and financial rights.

NOTE: Only the most recent and complete source of the vital information should be treated as the vital record.

- G. Offices shall use [TSA Form 228, Vital Records Plan](#) and [TSA Form 228A, Vital Records Plan Supplemental](#), for their emergency plans and a corresponding [TSA Form 229, Vital Records Identification Schedule](#) must be provided for each record item noted on the TSA Forms 228 and 228A(s).

7. PROCEDURES:

- A. Records Liaisons: Submit documents, forms, and direct inquiries to the Records Management Officer via TSARecords@dhs.gov.
- B. Duplication and Storage:

- (1) Computer backup tapes, redundant IT systems, CD and/or DVD read/rewrite, memory sticks or external hard drives created in the normal course of system maintenance or other electronic copies that may be routinely created in the normal course of business may be used as the vital record copy. Hard copy records may be transferred for maintenance as microform.
- (2) When HQ Offices choose duplication as a protection method, the copy of the vital record stored at the TSA COOP site or other off-site location should be a duplicate of the original record. While the original copy of the vital records must be retained in accordance with the records disposition schedule, the duplicate copy at the TSA COOP site or other off-site location may be destroyed or deleted when no longer required as long as the original records have been identified and preserved.

C. Review and Retrieval:

- (1) Ensure that retrieval procedures require only routine effort to locate needed information, as individuals unfamiliar with the records may need to use them during an emergency or disaster.
- (2) Coordinate with appropriate HQ Offices to ensure that all parts and equipment needed to access vital records are available at the TSA COOP site or other off-site location.

D. Maintenance and Update:

- (1) Establish and maintain appropriate files containing vital records forms and references, subject to audit.
- (2) Review and update master sets consistent with the Vital Records Plan and certify quarterly (fiscal year) using [TSA Form 231, Vital Records Certification](#).

8. EFFECTIVE DATE AND IMPLEMENTATION: This policy is effective immediately upon signature.

APPROVAL



12/31/07

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Administration/Chief Financial Officer

Date

**TSA MANAGEMENT DIRECTIVE No. 200.9
VITAL RECORDS PROGRAM**

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Business Management Office Directors, and Records Liaisons
Points-of-Contact: Records Management Officer, TSARecords@dhs.gov, 571-227-2068/1564; and
respective TSA Headquarters Office/Airport Records Liaisons