Chapter 9. FILING PROCEDURES

1. Record Creation and Filing: The creation, filing, and storage of unnecessary documents and data are inefficient and wasteful in terms of staff productivity, time requirements, and equipment usage. The following are some methods to avoid this situation:

   a. Limit the creation of formal communications to Mission-related programs and projects where records are needed to document the required activities. Telephone calls and e-mails are the preferred method to follow up on routine matters or where a simple clarification is needed.

   b. Limit copies to only those specifically required, requested, or which serve a valid purpose. Eliminate 'just in case' copies; they are costly and difficult to track.

   c. Suggestions for eliminating copies of routine communications that do not require the creation of a record:

      (1) Public requests for reports and publications, especially ones created on a reoccurring basis. If possible scan the requested document or information and attach it as a pdf file to an e-mail response. If this option is not applicable, then notate the incoming request thanking the requestor for their interest, enclose the materials requested, and mail as soon as possible. Do not copy and retain the incoming request.

      (2) Do not create form letters when a simple e-mail response is all that is necessary.

      (3) Do not create transmittals when an e-mail or phone call is a sufficient response.

   d. Limit copies to only those offices that have an action item or are a participant in the work activity.

   e. Limit the creation of daily and weekly communications, reports, or other materials when a summarized document is sufficient.

   f. Limit technical reference documents, reports, and publications to only the quantity needed for immediate distribution. Do not make unnecessary quantities for 'just in case' future needs, especially if the information will be changing on a routine basis. Post the documents to public websites if possible and create one Official Record copy for archiving in accordance with approved retention schedules.

   g. An office may choose not to enter short-term communications, forms, or records into REDS if they have a short term retention period.

2. Arranging Folders, Guides, and Labels. The orderly appearance and efficiency of any file depends upon the careful preparation, use, and arrangement of folders and guides in the file drawer or shelf. The incorrect use of either folders or guides will slow down file operations.

   a. Guide Cards and Folders. Guide cards and folders are important for both subject and case files. Folders are necessary to keep records together and in order. Square-cut folders are recommended for all files. Guide cards serve as sign posts to help speed up the filing and finding operations. The general rule to follow is 1 guide to every 8 to 12 folders. Folders and guides should be placed in the file drawer in the same sequence in which the series appear on the file plan, starting at the front of the drawer, with guides preceding the related folders.

   b. Label Preparation. The Classification Code from Volume II of this handbook is shown first. This code is the basis for the arrangement of all files. The label will also indicate a descriptive file name, project, location, open or inclusive dates. If the record is permanent, notate permanent after disposition. Sample of folder label is shown below.

LAW-5.00	Indian Trust Litigation	LAW-5.00
Folder No.: 1069112-0	Solicitor Instructions	Folder No. 1069112-0
Open: 1/1/2007	General File	Close:
Location: 84-21300		Project No.: 3437
Denver Office	[BARCODE]	Disposition Date:

3. Receiving and Preparing Documentation for Filing. The following preliminary steps should be taken in preparing paper records for filing:

   a. Remove all rubber bands, plastic clips, and other temporary fasteners.

   b. Determine that the file is complete and has all necessary enclosures or attachments.

   c. Remove all executive correspondence covers, envelopes, and routing slips except those which contain remarks of significant record value.

   d. Inspect all documents to ensure that they have been authorized for filing. Incoming letters which did not require a reply should have the file classification code and folder identification number (or a notation to establish new folder) and the initials of the person forwarding the communication for filing in the upper right margin. This notation is the file authority and shows that the proper official has seen the document and "certified" the need for filing.

   e. Ensure that parts of other files are not accidentally attached.

4. Classifying Records for Filing. After the documentation has been reviewed, prepared, and assembled for filing, the next step is to verify that the correct classification code has been chosen from Volume II of this handbook and applied to the record. The classification code determines the length of time the documentation will be retained before disposition occurs. This applies to electronic records as well. If the code assigned by the document creator or its recipient does not appear correct, the file custodian may prepare a cross reference and file it in a secondary location, or contact the creator or recipient to determine why the code seems significantly different. Codes should not be changed arbitrarily without prior consultation and consent of the document creator, program/project manager, or recipient of the incoming communication.

5. Cross-Referencing. Cross-referencing is a means of filing a document in a secondary location using an additional file identifier other than the one under which it is initially filed. Records often contain more than one major topic, or may refer to a major and minor subject. Records may also apply to one or more Projects or Programs, cross Regional or Project boundaries, or involve a contract to purchase multiple goods and services for different locations. In such cases cross-referencing is a must because only one document refers to all the various activities. Under these circumstances, requestors may ask for the records using any of the topics or subjects because it is the only information they are familiar with or have available.

   a. A cross-reference may be used to indicate that information about a specific topic or subject exists in more than one location. It is not recommended that the actual file be copied and placed in the secondary location; only a cross-reference form indicating the original location is needed.

   b. Select the most appropriate secondary file classification code from Volume II. Make sure original is placed under the classification code with the longest retention.

   c. Avoid unnecessary cross-references.

6. Placing Records in File Folders. Review and verification of the records being placed in file folders is critical to avoid misfiles. It is extremely important to check the documents and other materials being filed with the classification code and folder label to make certain they are all correct. If records are placed in the wrong folder with an incorrect classification code the likelihood is they may not be rediscover for decades. One misfiled record could cost Reclamation tens of thousands of dollars in lost productivity and even more in an effort to recreate the record and data, provided it can be done at all. Misfiles can greatly effect the outcome of litigation as well. Records should be filed in the appropriate folder facing forward with the date of the document or title toward the left of the file as the reader faces it. In this manner, all filed documents can be read easily. Records should be filed chronologically with the latest date in the front of the folder.

7. Filing Sensitive Records. The same general filing guidelines used for other records are used in filing these documents and records. However, the following safeguards apply:

a. For Official Use Only (FOUO). Filing, storage, and use of these records or documents must comply with Reclamation Manual; SLE-02-01 and IRM-02-02 respectively.

b. Litigation. Records identified as ‘privileged’ for litigation purposes must be marked with the case number, segregated from the regular files, and stored separately until the suit is resolved. When the suit is resolved and all appeals finalized these records and documents must be re-filed in their normal sequence. Records identified for litigation freeze/hold may remain in their normal filing location provided they are marked or designated and access is restricted to authorized staff using a sign-in / sign-out card to control and track their movement.

c. Proprietary. Documentation which is proprietary to a company or individual and shared with Reclamation for technical or other reasons must be segregated from regular filing locations so it is not intermingled with routine records. Once the contract requirements have been met, the materials should be returned to the owner, or depending on the contractual obligations, incorporated into Reclamations files at the conclusion of the project.

8. File Split and File Closure.

a. When a folder reaches its maximum filing capability, it should be split by creating a second folder using the same label information as the parent folder but with different inclusive dates. For example, if the original folder was dated January 1, 2007 through May 17, 2007, then the dates on the split folder would be May 18, 2008 through December 31, 2008. Depending upon record creation, a file could be split several times during a year.

b. File closure is the process of segregating inactive from active records. Closing the files is the initial step in preparing the records for transfer or disposition in accordance with the established retention schedule procedures. Closure is essential to control growth, the accumulation of records, and facilitate economic disposition through transfer from high cost office space to less expensive warehouse facilities. The file closure process also initiates the routine disposal of short-term temporary, non-record, and transitory materials from the files allowing for the creation of space for new records. File custodians should physically inspect the filing area and create electronically generated reports to identify records due for disposition. Likewise, electronic systems administrators should query the system and delete all data identified for deletion.

NOTE: The retention period does not begin until the file is closed. Therefore, transfer and disposal occurs once the file is closed and the retention period has expired in accordance with the approved retention schedule.

c. Records such as financial accounting records filed chronologically by fiscal year are a good example of files that are closed on a regular basis.

d. Subject, and general files, are typically filed by calendar year and closed in December.

e. Case files should have a file split at the end of each calendar year to create a consistent filing process and speed search time. These files should not be closed until certain events occur, such as termination of a contract, completion of Project construction, termination of a lease, final purchase order payment, etc. Disposition of case files does not begin until the file is closed or the records become inactive. Portions of the permanent case file may be closed at the end of a calendar year, processed, and transferred to the FRC or Archives while the remainder of the file is kept and continues in an active filing status. For instance, Project or Program case files for a specific feature or activity dated 1956 to 1996, which are no longer needed for current business, may be closed and transferred while the remaining year, 1997 to the present are retained in the office.

f. Technical reference materials have no established closure and may be destroyed when the information becomes obsolete. These materials should be reviewed periodically to determine if they are still useful.

9. Locating Files.

a. It is the responsibility of the person requesting the records to provide sufficient information to identify the document, file, or information they are seeking; such as name, file number or subject, and the date.

b. They may need to identify the Project number, name, title, or folder number, example; Project 28; Sun River Project; Gibson Dam; Geology report dated October 1928.

c. If the records are subject filed the requestor should provide some type of specific identifier such Water Resource Study for Arapahoe County, Colorado, and a date.

d. If the records cannot be located, they may not have been received for filing yet or may be awaiting filing. Check with the office or unit responsible for creating or retaining similar documents or records. Also check to make certain the records haven't been transferred to the Federal Records Center or National Archives.

e. If the records have been entered into the ARMS indexing system or its REDS-Records replacement, then a search of the database would be the first step in locating the documents. It is suggested that several different search criteria be used to make certain a thorough search is accomplished. Then, look for records in a physical search of the filing equipment. Remember that not all records have been input to the REDS-Records database.

10. Loans. When records or file folders are removed from either Central Files or the File Station a 'Record Loan Form' must be completed and signed by the individual to whom the records are physically given or the person removing them from the filing system. Therefore, if one person requests the loan and another signs for it, it is the responsibility of the person signing for the loan who is accountable for the records. Loans should have an ending date of not more than 90 days after checkout; should be returned, inspected, and review; and re-loaned if necessary. Proper loan documentation and tracking prevents lost records and information, information which may be critical to an investigation, study, safety issue, or litigation. Boxes and file folders need to be checked to make sure all records have been returned.

    Loan forms must include space for the following information:

    - Name
    - Mail code / organization
    - Phone number
    - Office location
    - Signature block
    - Date of loan
    - Due date for return
    - Re-loan date and due date
    - File folder number
    - File folder location
    - Document number and location
    - Accession number and box number if applicable

11. Maintaining the Files. Neatness and consistency are essential to good files management.

    a. Using proper filing equipment and labeling techniques is necessary to maintain efficiency and consistency. Creating file folder labels from the REDS-Records system and using them to identify records and information within the files saves time and speeds search results. Arranging the files in proper order according to the office file plan and IMH coding, including REDS-Records folder labels, is necessary for searching and locating the records and information in an efficient and timely manner.

    b. Simple filing procedures, such as allowing sufficient spacing within file folders, filing equipment, and boxes, are good business practice.

    c. Avoid the clutter. Don't file unnecessary items such as envelopes, extra drafts, or packing slips in files with a permanent retention. Oversized paper clips, out dated phone books or lists, and unusable electronic media such as 5.5 inch floppy disks are other examples of clutter.

12. General Files. Information, records, and data of a general nature, but specific to a particular Project or Program, should be filed in the General File folder located at the beginning of that activity, or in the electronic version of the General File, NOT in the General Subject Files.

For instance, a memorandum concerning the schedule for water releases on the Paonia Project during 1999 should be filed in the Paonia Project – General File, and not in a General Subject File titled Water Releases – 1999. This is because it is specific to just the Paonia Project, and not all Projects throughout Reclamation.

General Subject Files should be in a separate location from Project or Program records and contain information that is specific to a particular subject. For instance, a letter from an engineering firm requesting information about standard canal designs, or a request for Reclamation-wide annual budget for the year 2000 should be filed in the General Subject Files. Files may contain subjects such as Water Resources Management, Standard Designs for Gate Hoists, or Valve Assembly Tests.

A file for Valve Assembly Tests would be filed in the General Subject Files with a file folder title of Valve Assembly Tests while a report entitled Valve Assembly Tests for Sun River Dams would be filed under the Sun River Project – General File

13. <u>REDS-Records Data Entry</u>.

Folder level index entry is required for all Native American records and all folders being sent to the Federal Records Center or National Archives.

Document level index entry is to be used at the discretion of each office.