

## RECORDS AND INFORMATION MANAGEMENT

- 1. REASON FOR ISSUE.** This Veterans Benefits Administration (VBA) Directive revises the authority and policy for a formalized records management program, defines the roles and responsibilities for all VBA personnel and follows the requirements of the National Archives and Records Administration (NARA) and the Freedom of Information Act (FOIA).
- 2. SUMMARY OF CONTENT.** This Directive defines the policy for carrying out the records management program and clarifies the associated roles and responsibilities within all VBA facilities. **NOTE:** *VBA developed these policies based on, and in conjunction with, records management requirements contained in various Federal regulations, guides, bulletins, and memoranda published by NARA.*
- 3. RELATED ISSUES.** VA Directive 6300, Records and Information Management.
- 4. RESPONSIBLE OFFICE.** The VBA Office of Administration and Facilities (20M3) is responsible for the contents of this Directive. Address questions to the VBA Records Officer's centralized mailbox, [VAVBAWAS/CO/RECORDS MANAGEMENT](mailto:VAVBAWAS/CO/RECORDS%20MANAGEMENT).
- 5. RESCISSIONS.** This Directive supercedes VBA Directive 6300 - Records and Information Management dated September 23, 2016.
- 6. RECERTIFICATION.** VBA will recertify this Directive by the end of July 2021.

/s/

Thomas J. Murphy  
Acting Under Secretary for Benefits

## RECORDS MANAGEMENT

**1. PURPOSE.** This Veterans Benefits Administration (VBA) Directive defines policies for establishing and maintaining a formalized records management program within all VBA stations (e.g., regional offices, VBA Central Office, centers, off-site storage locations, out-based sites, and alternative worksites). It establishes the roles and responsibilities for VBA personnel to create, manage, use, store, and dispose of VBA Federal records in accordance with Department of Veterans Affairs (VA) and National Archives and Records Administration (NARA) policies.

**Authority:** *Title 36, Code of Federal Regulations (CFR), Chapter XII, Subchapter B.*

### 2. BACKGROUND

a. The Federal Records Act of 1950, as amended, contains the statutory authority for VBA records management. Government-wide responsibility for Federal recordkeeping is shared by the General Services Administration (GSA) and NARA.

b. Title 44 of the United States Code (U.S.C.) §§ 3301 through 3314 establishes the legal basis for the disposal of records of the United States Government.

c. The Paperwork Reduction Act, 44 U.S.C. Ch. 35, establishes the legal basis for minimizing the cost of information creation, collection, maintenance, use, dissemination, and disposition.

d. VA Directive 6300 requires all administration leadership and other key officials to define records programs within VA policy requirements, including assigning records managers and establishing of policies to manage records within the administration.

e. On November 28, 2011, President Obama signed the Presidential Memorandum -- Managing Government Records. This memorandum marked the beginning of an Executive branch-wide effort to reform records management policies and practices and develop a 21st-century framework for managing government records. VBA is working to implement the 2019 mandate that requires federal agencies to manage all permanent electronic records in an electronic format. Additionally, VBA is currently working with the Department to implement the 2016 mandate requiring all federal agencies to manage both permanent and temporary e-mail records in an accessible electronic format.

### 3. POLICY

a. It is VBA policy that all Federal records contained on paper, electronic, or other media are properly managed from creation through final disposition, in accordance with federal laws, the [General Records Schedule \(GRS\)](#) and [VBA Records Control Schedule \(VBA RCS\) \(VB-1\)\(VB-2\)](#).

b. VBA will create and preserve records, in any medium, which document the

functions, policies, decisions, procedures, and essential transactions of the agency.

c. VBA will maintain and preserve records necessary to protect the legal and financial rights of the Government and of persons directly affected by its activities.

d. VBA will make reasonable efforts to maintain records in formats or media that are reproducible for purposes of the Freedom of Information Act (FOIA).

e. VBA is committed to enforcing the proper disposition of Veterans' records by ensuring the records are appropriately protected and maintained. The Records Management Officer (RMO), Records Management Technician (RMT), and supervisors will work together to ensure all VBA employees and affected parties follow established procedures for storing, routing, and disposing of Veterans' paper and electronic records.

f. VBA will maintain records or information obtained from other Government agencies in accordance with VBA records management/ information security policies. VBA will comply with the rules, regulations, and restrictions of other agencies regarding the use of their records.

g. VBA will maintain and safeguard original military personnel/health records in such a manner that VBA can return them when requested. VBA will not destroy any original military personnel/health records, or remove them from its custody for any reason, without obtaining permission from the military service to which the records belong.

h. Effective immediately, all VBA employees, contractors, Veterans Service Organizations, interns, volunteers, and any other affected parties, located at a VBA station or a non-VBA station authorized by VBA, must comply with the revised requirements established in this document. They are required annually to take the VA Talent Management System (TMS) Course #10176, "Privacy and Information Security Awareness and Rules of Behavior." They must also electronically sign a *Rules of Behavior* document at the end of the course. Any individual who violates this policy will be subject to appropriate administrative action.

i. **Note:** Where the general procedures set forth in this document address a matter that is also addressed in the business-line specific appendices A through E, the business-line specific process set forth in the relevant appendix will control.

#### 4. RESPONSIBILITIES

a. **The Under Secretary for Benefits.** The Under Secretary for Benefits, or designee, is responsible for ensuring:

1) VBA maintains an effective records management program.

2) VBA maintains a vital records program to guarantee the continuity of essential Federal Government activities during and following a national emergency, a

technological or natural disaster, and to protect the rights and interests of VA beneficiaries and employees.

3) VBA appraises all records and publishes their approved retention periods in the appropriate [RCS VB-1, PART I & PART II](#).

4) VBA places the Records Program Office at a level in VBA with sufficient authority and funding to efficiently and effectively implement the objectives and policies of the VBA records management program.

5) VBA's records management program provides access to records, regardless of the medium, when requested.

b. **Directors.** Directors are responsible for complying with this records management policy by:

1) Delegating local and appropriately trained RMTs to temporarily serve as alternate RMOs during the latter's absence or unavailability (e.g., leave, training).

2) Ensuring employees complete all required records management training.

3) Ensuring stations or other designated areas under their control meet all requirements for the creation, maintenance, use, storage, and disposition of Federal records generated or obtained within their operations (see the lifecycle of records under [GRS](#) or the appropriate [RCS VB-1, PART I & PART II](#)).

4) Ensuring their station conducts an annual review of records control procedures and activities as part of their Systematic Analyses of Operations (SAOs).

5) Ensuring each employee has a red envelope and red corrugated box, with sufficient quantities on hand to replace unserviceable ones.

6) Ensuring staff follow the policies and procedures outlined in this Directive, [GRS](#), [RCS VB-1, PART I & PART II](#), and the [Title 36 CFR, Chapter XII, Subchapter B](#) in order to create and preserve documents pertaining to the functions, policies, decisions, procedures, and essential transactions of the station.

7) Directors must certify to the Under Secretary for Benefits annually that all employees are aware of the policies for the maintenance, review, and appropriate disposition of Veterans' and other governmental papers located in all VBA facilities and worksites per this Directive.

**Note:** Due to the level of responsibility, SES and RO Director personnel may be creating Permanent VBA records. Care should be taken that these individuals' work-products and e-mails are maintained per [RCS VB-1](#) or the appropriate GRS.

c. **VBA Records Officer.** The VBA Records Officer, or designee, is responsible for establishing processes and guidance in compliance with this policy, to include:

- 1) Developing and maintaining VBA-specific policies and procedures for the development, maintenance, storage, and disposition of Federal records created within VBA.
- 2) Developing and maintaining [RCS VB-1, PART I & PART II](#), in accordance with NARA requirements.
- 3) Managing applications and petitions to modify existing records schedules and submit future RCS requests.
- 4) Developing and maintaining a formal records management program specific to records created, used, stored, and dispositioned within VBA Central Office.
- 5) Distributing policies, procedures, and notifications from the VA Records Officer or NARA to all VBA RMO/RMTs and other appropriate personnel.
- 6) Providing guidance to all VBA staff on the applicability of VA policy and NARA requirements.
- 7) Reporting all violations to NARA.
- 8) Ensuring all VBA RMO/RMTs complete all training requirements.

d. **RMO/RMTs.** RMO/RMTs are responsible for:

- 1) Reviewing records to ensure requests for disposition and disposal of documents comply with the procedures outlined in this policy.
- 2) Providing all new employees with a packet containing VBA's disposition and disposal policy, with other records management materials, and ensuring employees know and understand where to locate information pertaining to VBA's records management policy and procedures.
- 3) Conducting appropriate training with each individual(s) (i.e. employee and/or supervisor) who violates records policy.
- 4) Maintaining a records violation log by utilizing VBA Forms 23-0980 (Records Management Officer (RMO) Violation Report) and 23-0980-1 (Records Management Officer (RMO) Violation Report Log) to identify and document violations to this policy. Violations will be reported to the VBA RMO via the organizational mailbox - [VAVBAWAS/CO/RECORDS MANAGEMENT](#). These reports will be provided not later than the fifth day of the month following the identified violation.

5) Tracking violations to identify repeat offenses by the same individual(s). Reporting repeat offenders to the station Director and VBA Records Officer so appropriate administrative action may be taken.

6) Annually completing TMS #3873736, "Records Management for Records Officers and Liaisons." Attending NARA's KA1- Records Management Overview course.

7) **Completing and maintaining proper inventory/file plans for the station.**

8) Performing additional duties and responsibilities contained in the RMO/RMT Position Description.

**Note:** Division Records Management Officers (DRMOs) are responsible for the same duties, roles, and responsibilities listed in this Directive for the RMO/RMT positions.

e. **Supervisors.** Supervisors are responsible for:

1) Ensuring staff follow the policies and procedures outlined in this Directive, [GRS](#), [RCS VB-1, PART I & PART II](#), and the [Title 36 CFR, Chapter XII, Subchapter B](#) in order to create and preserve documents pertaining to the functions, policies, decisions, procedures, and essential transactions of the station.

2) Reviewing all records, both hardcopy and electronic, submitted by employee(s) for disposition or disposal to ensure they comply with the procedures outlined in this policy.

3) Reporting all violations to the RMO/RMT and taking the appropriate administrative action.

f. **Employees.** Employees are responsible for:

1) Maintaining their workspace and ensuring all records are submitted for disposition and disposal in accordance with the procedures outlined in this policy.

2) Protecting Personally Identifiable Information (PII) and other VA sensitive information.

3) Completing the VA Talent Management System (TMS) Course #10176, "Privacy and Information Security Awareness and Rules of Behavior."

## 5. **HARDCOPY RECORDS DISPOSITION PROCEDURES**

a. **Shredding Boxes and Envelopes**

1) Each employee will receive two red envelopes and a red corrugated box in

which to place records for disposal.

2) Each Station will purchase and distribute to all employees the appropriate quantity of red envelopes and boxes.

3) All red envelopes and boxes will be labeled with the applicable employee's name.

4) Employees must reuse the red envelopes and boxes and will not destroy them.

**b. Disposal of Records.**

1) Only non-records, temporary records, identifiable duplicate records, and records created and generated electronically that can be replicated (e.g., records coming from the VBMS eFolder, a Virtual VA file, or other electronic systems of record) will be placed in the red corrugated boxes.

2) Place all records described above containing PII into the red envelopes.

3) The following records containing PII require **only the employee's signature and date** before placing in red envelopes:

- Records identified in [GRS](#) or [RCS VB-1, PART I & PART II](#) as being non-records, temporary records, or records approved for disposal
- Draft records (e.g., memos, letters, rating decisions) with a legible watermark stating "Draft"
- Training materials

4) The following records containing PII require **two signatures (employee(s) and supervisor) and date** before placing them in a red envelope:

- Duplicate benefits-related and evidentiary submissions submitted from the Veteran's representative
- Waivers, administrative decisions, formal findings, etc., that the Veteran or the Veteran's representative submit and are duplicate VA documents of evidentiary nature
- Duplicate evidentiary submissions from third parties
- All copies of benefits-related materials printed from a system of record (e.g., eFolder, Virtual VA file) (two signatures will be required to verify they are printed copies until all benefits-related material are printed off with some type of watermark that identifies them as printed copies)

5) Safeguard documents containing Federal tax information by following [IRS Publication 1075](#)

**Note:** Due to the United States Court of Appeals decision, *Robinson v. McDonald*, no Compensation benefit-related records may be destroyed. All Compensation benefit-related records must be maintained in hardcopy form.

### c. Disposition of Records

1) All permanent records and VA sensitive information are to follow an approved record disposition plan, see [GRS](#) and [RCS VB-1, PART I & PART II](#), to include; (1) retaining; (2) transferring to a records center for temporary storage; (3) transferring to an archival agency; (4) donating to an eligible repository; and (5) transferring to an approved image reproduction vendor.

**Note:** *Never place permanent records, sensitive information, and temporary records containing PII with trash, recycling, or other refuse.*

**Note:** *Each business line should follow its program-specific handling instructions as shown in the respective appendix. For any other documents that are processed outside of the program-specific handling instructions (e.g., printed documents from SOR), they will be dispositioned per this Directive and the respective [RCS VB-1, PART I & PART II](#) accordingly.*

### d. Roles for Hard Copy Record Disposal

#### 1) Employee Role

- Bundle records (staple multiple pages) by beneficiary or claimant's name
- Sign, date, and annotate the top page with the reason for disposal (e.g., duplicate record)
- Place bundles too thick to be stapled in regular envelope(s) or fasten by rubber band(s)
- Deliver all records to supervisor for a second signature during the times scheduled by the supervisor
- Place all records into red envelopes or boxes after they are returned by the supervisor

#### 2) Supervisor Role

- Review records submitted by the employees to determine if disposal is appropriate
- If approved, sign and date the record(s) and turn in to the RMO/RMT
- If supervisor finds records improperly marked for disposal, notify the employee of the violation found during review and report the violation to the RMO/RMT
- If the RMO/RMT returns records they determined as inappropriately submitted for disposal and the supervisor disagrees with the finding, they should create a justification/explanation letter and return to RMO/RMT. Otherwise, return records to employee(s) for proper disposition

- 3) RMO/RMT
  - Retrieve red envelopes and boxes per designated schedule approved by the Director or Assistant/ Deputy Director
  - Review records to ensure they comply with this policy
  - Update the violation tracking log
  - Notify supervisor and return all records inappropriately submitted for disposal to supervisor
  - Conduct appropriate training when a violation has occurred
  - Notify the VBA Records Officer of any violations on a monthly basis
  - Keep a log of all records approved for disposal

## 6. ELECTRONIC RECORDS DISPOSITION PROCEDURES

### a. Disposal of Records

1) Delete only temporary records, non-records, or records approved for disposal according to the [GRS](#) and [RCS VB-1, PART I & PART II](#).

2) Once a record is uploaded or created in an electronic system, it cannot be deleted without requesting assistance from a program-designated Service Desk or authorized Administrator. No employee should be able to delete a record directly. The RMO/RMT must be notified so the record can be recorded on the disposal log.

3) If a record is identified as being misfiled in an electronic system, the employee shall take immediate action to relocate the document to the correct record location and follow approved procedures to have the misfiled record deleted from the incorrect location.

4) Safeguard documents containing Federal tax information by following [IRS Publication 1075](#)

**Note:** Each program office will be responsible for developing its own procedure policy on managing deletion of records within their electronic systems of record (e.g., [M21-1, Part III, Subpart ii, Chapter 4, Section G- Folder Maintenance](#)).

### b. Disposition of Records

1) All electronic permanent records and VA sensitive information records are treated the same as hardcopy records and should follow an approved record disposition plan, see [RCS VB-1, PART I & PART II](#), to include (1) retaining, (2) transferring to a records center for temporary storage, (3) transferring to an archival agency, (4) donating to an eligible repository, and (5) transferring to an approved image reproduction vendor.

**Note:** *Never delete permanent records or VA sensitive information.*

## 7. HANDLING OF UNIDENTIFIABLE MAIL

**a. Disposal of Hardcopy Unidentifiable Mail Records**

- 1) All unidentifiable mail should be turned in to the RMO/RMT.
- 2) Unidentifiable mail will be maintained in a folder marked as "Unidentifiable Mail" in alphabetical order by calendar year.
- 3) At the end of the calendar year, mark the folder as closed with the date.
- 4) After eighteen months follow proper disposition procedures.

**b. Disposal of Electronic Unidentifiable Mail Records**

1) Each program office will be responsible for developing its own procedure policy on managing deletion of unidentifiable mail records within their electronic systems of record (e.g., [M21-1, Part III, Subpart ii, Chapter 1, Section B- Mail Management](#)).

**8. HANDLING OF CONGRESSIONAL CORRESPONDENCE**

a. The Office of Administration and Facilities is working on updating the [VBA RCS](#) pertaining to disposition procedures for Congressional correspondence. Until the update is approved, all VBA stations will follow this policy.

1) All VBA stations will follow the [VBA RCS VB-1Part II](#) Item Number 2-3.2 for disposition of Congressional correspondence.

2) Congressional correspondence pertaining to benefit-related issues should be treated as evidentiary and be placed in the Veterans hardcopy folder as well as uploaded into the eFolder.

**9. HANDLING OF CLASSIFIED MATERIAL**

a. VBA does not accept classified materials for claims processing. VBA only accepts, handles, and processes "Sensitive" or "Unclassified" Veterans' compensation claims related document materials. VBA is not equipped nor permitted to receive, handle, copy, store, maintain, or process classified documents. This is due to not having the appropriate level Sensitive Compartmented Information Facility (SCIF) or the appropriate level classification safes associated with maintenance and storage of classified documents that these classified security levels require.

**10. ACCOUNTING OF CERTAIN DISCLOSURES**

a. Each station will keep an accurate accounting of requests (e.g., FOIA or Privacy requests) for any record under its control from which information is retrieved. FOIA requests should be tracked and maintained in the FOIAXpress system. For more detailed instructions on Privacy, please reference [5 U.S.C. 552a\(c\)](#). Stations will follow this procedure manually until an electronic accounting system is developed for VBA use.

b. Proper accounting will include the following information.

- 1) The date
- 2) Identifier (e.g., name, identifying number, or symbol) of record about which information is being requested
- 3) Name and address of the person or agency making the request
- 4) Nature of the request

c. After disclosure, the stations designated Privacy person will maintain the accounting on file for a minimum of five years or the life of the record, whichever is longer.

d. The accounting will be made available to the individual named in the record at his/her request.

e. The station's designated Privacy person will inform any person or other agency about any corrections or notation of dispute of any record that has been disclosed.

## **11. MAINTAINING AND HANDLING OF NON-WORK RELATED RECORDS**

a. Employees are permitted, at their own risk, to maintain their own PII at their assigned workstations. However, employees are strongly encouraged to secure this information at home.

b. The depositing of employee personal non-work related items within the red shred boxes for disposal is not authorized. This is considered to be a violation of policy due to being a contracted government service.

## **12. ITEMS ACCEPTABLE FOR DISPOSAL IN EMPLOYEE TRASH CANS**

a. The following items may be placed in employee trash cans as long as the items do not contain any PII or protected information.

- 1) Food-related waste (food wrappers, containers, paper plates/cups)
- 2) Packaging materials, including corrugated cardboard, bubble or plastic wrap
- 3) Other plastic items, including file tabs, colored document flags, envelopes, and clear plastic packing tape
- 4) Pasteboard food, medication boxes, and cardboard backs of paper tablets
- 5) Napkins/facial tissue
- 6) Personal magazines and newspapers
- 7) Adhesive or "post-it" notes
- 8) Phone message slips

## **13. HANDLING DISPOSITION OF EMPLOYEE SENSITIVE MATERIAL**

a. Employee sensitive records (e.g., employee records, corrective actions, and awards) are usually maintained by supervisors, managers, or human resources officials. These records should be delivered directly to the RMO/RMT in a sealed envelope(s) with the source and type of record clearly identified and signed on the outside of the envelope by the appropriate senior official.

#### **14. SPECIAL INSTRUCTIONS FOR DNA SPECIMENS**

a. The Department of Defense retained DNA specimens in Servicemembers' health treatment records from 1992 until 1996. In June 1996, the Assistant Secretary of Defense directed the removal of the specimen samples from the health records. Refer DNA specimens found in VA claims folders to the nearest VA Medical Center for disposition. ROs are encouraged to enter into a memorandum of agreement (MOA) with their respective VA medical campus for disposition of DNA specimens. Disposition of medical x-rays will follow the proper disposition outlined in VBA RCS, VB-1, Part I, Field, Section XIII, Item 13-061.100 [RCS VB-1, PART I & PART II](#) dated January 31, 2014.

#### **15. OUT-BASED LOCATIONS AND TELEWORK EMPLOYEES**

a. Out-based locations with assigned full-time supervisors and/or officers-in-charge are authorized to have shredders that comply with VA standards. Supervisors exercise direct control of these shredders. Locations co-located with a VA Medical Center or outpatient clinic with shredding service contracts in place are authorized to use the facility's shredding service once a memorandum of understanding (MOU) or similar document is in place to establish and clarify the records disposal procedures. These out-based locations are required to follow the same records disposition and disposal procedures as outlined in this directive. However, out-based supervisors must review 100 percent of the records submitted for disposal. All out-based locations are subject to unannounced annual compliance reviews.

b. Out-based locations staffed only by non-supervisory employees and telework employees are not authorized to dispose of any records. They must physically bring these records to the nearest VBA station or send them to the station via UPS or other approved carrier on a regular schedule for review and approval as outlined in this policy.

c. Out-based facilities staffed only by non-supervisory employees and telework employees located nearer to a station other than their assigned station may send their records to the station that is nearest and/or most cost-efficient. In these cases, the station having jurisdiction of the employees and the station that will handle record disposition and disposal must create a memorandum of understanding (MOU) or similar document that will establish and clarify the records disposal procedures in accordance with this directive.

#### **16. HANDLING SHREDDING REQUESTS FROM TENANTS HOUSED IN VBA FACILITIES**

a. Veterans Service Organizations and other VA organizations (e.g., Office of Information and Technology, General Counsel) housed in VBA facilities who use station disposal services should clearly identify the source(s) and type(s) of records on the outside of the record before delivering them directly to the RMO/RMT. The senior leader, or designee, for each of the organizations must sign the record with the name of the official clearly identified. The RMO/RMT will dispose of the material without further review. Preferably, the RMO/RMT will keep this material separate from the normal disposal record(s) he/she reviews.

## **17. MAINTAINING GOVERNMENT RECORDS IN EMPLOYEE WORKSTATIONS**

a. All official claims folders, Federal tax information, and claims-related records must be stored in open areas on employee desks, in clearly marked claims file banks, or unlocked desk or file drawers specifically used to store assigned cases.

b. Operations reports, lists, and related workload management records may be stored on employee's desks or in labeled drawers. Training records containing un-redacted PII must be kept in an area clearly marked as "training records" and may not be removed from employees' workstations. Supervisors and RMOs/RMTs are responsible for ensuring compliance with all aspects of this policy, to include inspection of employee workstations.

c. The policy on storing records in open and unlocked areas does not apply to functions performed by the Agent Cashier. Storage procedures for convenience checks and other negotiable documents remain unchanged.

## **18. WORKSTATION COMPLIANCE INSPECTIONS**

a. The purpose of workstation inspections is to monitor compliance with the provisions of this policy and undertake the appropriate education, training, additional monitoring, or other necessary actions.

b. Quarterly, RMOs/RMTs will conduct unannounced inspections of workstations of 25 percent of station employees who process benefits-related claims to ensure compliance with this directive.

c. RMO/RMTs will randomly conduct spot-checks of employee trash cans.

d. The Support Services Chief or designee will oversee the inspections to ensure accountability.

e. Non-compliance issues requiring more frequent inspections are at the discretion of the Director.

f. Out-based employees who transport and/or store claims-related paper records at

their out-based facility will be subject to annual inspections by a supervisor, RMO/RMT, Privacy Officer, or other Director designee.

g. Telework employees who transport and/or store claims-related paper records at their alternate worksite will be subject to annual inspections by a supervisor, RMO/RMT, Privacy Officer, or other Director designee. However, telework employees who do not transport and store claims-related paper records at their alternate worksite will not be subject to these annual inspections.

h. All Directors and Supervisory Employees (i.e., Coaches, AVSCMs, VSCMs, and Assistant Directors) are exempt from workstation compliance inspections.

## **19. SHREDDING SERVICE CONTRACTS**

a. The use of shredding service contracts is the preferred disposal method, unless a contract is not available in the area or it is not cost effective. On-site shredding by a shredding service, and witnessed and certified by the RMO/RMT, is the preferred method of verifying the shred process. The shredding service provider/contractor and the RMO/RMT must certify each shredding event.

b. Taking material off-site for shredding may be the only option in some locations. When using off-site shredding, the contractor must certify in writing the process meets VBA standards for disposal as outlined in this directive. The RMO/RMT must physically observe and certify the initial off-site shredding process, and at least once per year make an in-person visit to recertify the contractor is compliant with VBA requirements. Records disposal certification both on- and off-site must be kept on file for 12 months.

c. Contractors who fail to provide service in compliance with these requirements must be reported immediately to the station's Chief of Support Services, Contracting Officer's Representative (COR), or designated official in the Director's Office, who will report the noncompliance to the Director. The station must take corrective action to rectify any violations to bring the complete record disposal process into compliance.

d. Shred contractors must comply with industry standards for cross-cut or double-cut shredding. The final product, if not recycled, will be disposed of by pulping, macerating, shredding, burning, or otherwise definitively destroying the information contained in the material.

e. A physical chain of custody must never be broken while conducting shredding services. The shred bins and vendor must always be escorted in VBA facilities by a government employee until the shred collection process is complete. No empty shred bins will be left unsecured or unattended in the hallways of any VBA facilities. Certificates of Destruction reflecting the total number of bins will be provided by the contracted vendor upon completion.

## **20. ACCESS TO SHREDDERS WITHIN VBA**

a. VBA will strictly control access to shredders, shred bins, or other methods of record disposal. RMOs/RMTs will secure all shred bins with locks or will locate shred bins in locked rooms. Only District Directors or the VBACO Director for Facilities and Administration can grant exemptions if dedicated rooms for securing shred bins are not available. If an exemption is granted, the record stating the exemption will be maintained on file with the RMO/RMT.

b. VBA will limit the use of personal shredders to individuals who handle sensitive employee information but do not process claims. These individuals may include senior management, specific operations staff chiefs, and RMOs/RMTs, as designated in writing by the Director. Directors may also authorize in writing specific individuals who have demonstrated the need to access shredders and the types of documents they may dispose of without RMO/RMT review. These authorizations must demonstrate no inherent or perceived conflict of interest (e.g., Veterans Service Center and Vocational Rehabilitation and Employment employees are prohibited from accessing VBA station shredders).

c. Union officials may continue to use VA-compliant shredders maintained in locked union offices to destroy only documents pertaining to official union business.

d. Shredders used within the VBA facility must be compliant with [VA Directive 6371, Appendix A, dated April 8, 2014](#), on shred size ([NISP SP 800-88, Guidelines for Media Sanitation](#), compliant to a size of 1x5mm). Non-VBA organizations (e.g., VSOs) who choose not to use the station shredding process must obtain a separate shredding service contract or purchase/use NIST 1x5mm compliant shredders at their own expense.

## 21. DEFINITIONS

a. **Records.** Records are 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 United States Government under Federal law or in connection with the transaction of public business. Records are preserved, or appropriate for preservation, by that agency, or its legitimate successor, as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of its data.

b. **Permanent Records.** As defined in 36 CFR 1220.18, General Definitions, NARA has determined that permanent records (e.g., original hardcopy documents for research and development projects) have sufficient value to warrant their preservation in the National Archives of the United States.

c. **Temporary Records.** Temporary records are records approved by NARA for disposal, either on an immediate basis or after a specified retention period.

d. **VA Sensitive Information.** All Department information and/or data on any storage media or in any form or format, which requires protection due to the risk of harm that could result from inadvertent or deliberate disclosure, alteration, or destruction of the information. The term includes not only information that identifies an individual but also other information where improper use or disclosure could adversely affect the ability of an agency to accomplish its mission; proprietary information; and records about individuals requiring protection under applicable confidentiality provisions (e.g., individually-identifiable medical, benefits, or personnel information).

e. **Disposal.** Disposal means the removal of records from VA control and authority by their sale, donation, or assignment of legal custody or title to others (Federal or non-Federal entities), or by their physical destruction, sale as waste material, or other forms of salvage or transfer (includes erasure of information captured or maintained on electronic media).

f. **Disposition.** Disposition means maintaining records or recorded information in approved proper place following their appraisal.

g. **Unidentifiable Mail.** Mail lacking identifying attributes or adequate information necessary to conclusively identify an individual, associate the correspondence with an existing claims folder, or create a new electronic claims folder (eFolder).

h. **Personally Identifiable Information (PII).** Any information one might use to distinguish or trace an individual's identity (e.g., name, social security number), alone or when combined with other personal or identifying information that is linked or linkable to a specific individual (e.g., date and place of birth, mother's maiden name).

i. **Electronic Records.** Electronic records is a category of machine-readable records in which the information is represented by electronic impulses on a magnetic medium, such as magnetic tape, disk, or diskette, and which requires the use of specialized equipment to convert the information to human-readable form.

## 22. References

- a. [Title 36 CFR, Chapter XII, Subchapter B](#)
- b. [General Records Schedule](#)
- c. [VA Directive 6300](#)
- d. [VA Directive 6371](#)
- e. [RCS VB-1, PART I & PART II](#)

## 23. Enclosures

- a. Encl 1. [RMO/RMT Appointment Letters](#)
- b. Encl 2. [File Plan](#)
- c. Encl 3. [VA Form 23-0980, Records Management Officer \(RMO\) Violation Report](#)
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## **24. Appendices**

- a. [VBA 6300 Appendix A. Compensation Service Records Handling Procedures](#)
- b. [VBA 6300 Appendix B. Insurance Service Records Handling Procedures](#)
- c. [VBA 6300 Appendix C. Education Service Records Handling Procedures](#)
- d. [VBA 6300 Appendix D. Vocational Rehabilitation and Employment \(VR&E\) Service Records Handling Procedures](#)
- e. [VBA 6300 Appendix E. Loan Guaranty Service \(LGY\) Records Handling Procedures](#)

## Compensation Service Records Handling Procedures

### 1. Overview of Compensation Service Imaging Process

a. Prior to July 7, 2014, Veterans mailed hardcopy (paper) applications for compensation claims and other supporting documentation to a VBA regional office (RO) or Pension Management Center (PMC) in the state or region where they reside. With the implementation of the Veterans Benefits Management System (VBMS), electronic submissions of Veteran applications that are stored in a digital filing system became necessary to ensure the electronic processing of compensation claims.

b. Through its Centralized Mail (CM) process, VBA began transitioning mail operations from the current decentralized, local mail delivery process to a centralized receipt and virtual analysis concept—using the United States Postal Service (USPS), contractor-operated scanning, and automated work routing processes—to add VA claimant correspondence received via mail directly into the VBMS eFolder.

c. The intent of centralizing VBA claims-related mail is to ultimately eliminate the paper handling of claims by VBA personnel at ROs, reducing the number of times mail is handled in any medium, and expeditiously upload claims, evidence, and other mail to a Veterans eFolder in VBMS.

d. To feed VBMS with digital files, the ROs and PMCs send incoming material to document-scanning vendors for upload into VBMS. In order to improve timeliness of this scanning process, VBA implemented Centralized Mail. Under these procedures, claimants and beneficiaries send mail directly to the scanning vendor, eliminating the need for RO or PMC mail processing. The USPS will automatically re-direct materials that are mailed to ROs or PMCs to the scanning vendor for processing. The vendor will scan and upload the digital images to the Centralized Mail Portal for processing in VBMS.

e. ROs still process mail locally received within their jurisdictions that may come directly from Veterans, dependents, authorized third parties, fiduciary appointees, or any individual with proper power of attorney authorities to submit materials on behalf of claimants. ROs will identify and associate the various source materials and will process the mail (pack and ship) for scanning (at the scan vendor) and subsequent upload of the imaged mail to the VBMS eFolder.

f. ROs are encouraged to limit the amount of internally-generated and printed documents as VA continues to move toward virtual claim processing. In the instances where paper documents are not subject to incorporation into the VBMS eFolder (i.e., draft documents, screen shots, other non-claims processing related materials) and may need local disposition, employees are to follow the below procedures.

## 2. Storage of Shredding Materials

a. Individual Employee Shredding Boxes and Envelopes: Each employee is provided a red envelope and box to place shredding material. Based on the volume of paper processed by the employees, the appropriate quantity of red envelopes and corrugated storage boxes (6”H x 12”W x 15”L, 10”H x 15”W x 15L or 10”H x 15”W x 24”L or similar sizes) will be purchased by the RO and distributed to employees. Employees will ensure that their assigned boxes and envelopes are labeled with their names for easy identification in their work areas. Employees will use the red envelopes for PII claims-related materials only.

b. The red corrugated boxes are to be re-used and will not be destroyed as long as the boxes are in serviceable condition and the identified employee is working in that office location. If a red shred box is deemed unserviceable, it will be replaced immediately. The RO director is responsible for ensuring that sufficient quantities are on hand to replace unserviceable items and for ensuring a sufficient supply of red envelopes.

## 3. Signatures Warranted

a. Documents that **do not** require signatures before destruction:

- Internally Generated Papers: Screen or award prints and work papers *not appropriate for inclusion in the veteran claims record* do not require signatures, initials, or dating, but must be placed in the employee’s red corrugated shred box when submitted for shredding. All such material is subject to review by the RMO and the RMT.

b. Documents requiring only **one** signature—the **employee’s signature** before placement in red boxes for shredding:

- 1) CAPRI records (these records are available electronically if needed for evidence at a later date)
- 2) Draft rating decisions, notification letters, and VBMS/MAP-D letters
- 3) Duplicate rating decisions, notification letters, and VBMS/MAP-D letters
- 4) Training materials

c. Documents requiring **two** signatures —the **employee’s signature** as well as the **supervisor’s signature**:

1) Claims and evidentiary submissions deemed duplicates submitted by the veteran or representative.

2) Waivers, administrative decisions, formal findings, etc., submitted by the veteran or representative that are determined to be duplicate VA documents of evidentiary nature.

3) Duplicate evidentiary submissions from third parties external to VA.

4) Computer-generated write outs that are usually included in veteran claims records (two signatures will be required until all claims-related write outs have been converted to VETSNET).

#### 4. Review Process for Document Destruction

##### a. Employee Actions

1) Bundle documents by beneficiary name.

2) Sign, date, and annotate single pages indicating the reason for destruction (e.g., "duplicate record").

3) Bundle and staple multiple pages together, with the top page signed, dated and annotated with the reason for destruction.

4) Place bundles that are too thick to be stapled in regular envelope(s), or rubber banded together.

5) Sign, date, and annotate the reason for destruction on the front(s) of the envelope(s) or top sheet as applicable.

6) Deliver all **claims-related materials**, along with the claims folder(s), if needed, for a second signature to supervisor during the times scheduled by the supervisors for receipt of the materials.

7) Place the two-signature claims-related documents into red envelopes or boxes after return by the supervisor.

##### b. Supervisory Actions

1) Review claims-related documents submitted by the employees to determine if destruction is appropriate.

2) Indicate approval by signing and dating the claims-related document(s) and returning the document(s) to the employee.

3) Review any claims-related documents identified by RMT/RMO that were inappropriately submitted for shredding by employees.

4) Sign and date the claims documents authorizing your approval, or instruct that the documents be returned to the claims file.

5) Notify the employee when a violation has occurred.

c. RMO/RMT Actions

1) Retrieve the envelopes and boxes directly from the employees per a designated schedule approved by the Assistant Director or the Director.

2) Review all claims-related documents submitted for shredding.

3) Conduct spot checks of all non-claims-related material to ensure that the materials are being properly identified for destruction.

4) Identify and separate any material deemed to be claims-related that requires a second signature.

5) Record these documents by C-number/name on a spreadsheet.

6) Provide the documents to the supervisor indicating the date of delivery and due date (not to exceed 5 business days).

7) Monitor supervisors' return of claims-related documents.

8) Place all approved materials in the shredding bins.

9) Provide additional records management training to employees as needed.

5. Documents Processed through Compensation Service Imaging System

a. All documents received at the local jurisdiction by the RO may come from various external sources; these sources include but are not limited to:

1) United States Postal Service

2) Federal Express (FedEx)

3) United Parcel Service (UPS)

4) Dalsey, Hillblom and Lynn (DHL)

5) Third-party private messenger service

- 6) Walk-in via Public Contact
  - 7) Veterans Service Organizations (VSOs)
  - 8) Mail from VA Satellite Offices and/or BDD/IDES Intake Centers
- b. Mail derived from courier services will be delivered to the physical address at the RO.
- c. When physical mail is received by the RO at the local jurisdiction, the mail clerk opens, date stamps, and separates the mail by VA business lines and/or addresses including:
- 1) Compensation,
  - 2) Pension,
  - 3) Fiduciary,
  - 4) Education,
  - 5) Insurance,
  - 6) Loan Guaranty,
  - 7) Veterans Health Administration (VHA),
  - 8) Vocational Rehabilitation & Employment (VR&E),
  - 9) National Cemetery Administration (NCA),
  - 10) Human Resources (HR) Management,
  - 11) Director's Office, and
  - 12) Co-located VSOs.
- d. The document process through the Compensation CM system is as follows:
- 1) Open the mail
  - 2) Date stamp the material
  - 3) Sort and separate compensation mail

- 4) Return compensation mail to the original envelope sent in or staple envelope to the front of the mail package
- 5) Package all envelopes in an approved USPS standard box
- 6) Place label in top right corner and label box as CM
- 7) Mail the box to the appropriate scan vendor

## Insurance Service Records Handling Procedures

### 1. Overview of Insurance Imaging Process

a. Since April 2000, Insurance has used the same process to image and electronically store incoming documents. Images of hardcopy documents are captured and validated prior to routing work items for action by employees; the paper documents are disposed of in accordance with established records control procedures under the General Records Schedule. Importantly, this system has long demonstrated its effectiveness in both protecting Personally Identifiable Information (PII) and supporting efficient, accurate processing.

b. Applications and correspondence received at the Insurance Center are permanently imaged and secured before being distributed for processing. Incoming items are categorized and barcodes are affixed to each document. Each document is placed into the current, secure paperless workflow system, batch-processed, counted, and verified through an exception reporting tool, Hyland Unity Client. To confirm that all documents have been imaged and permanently captured, all exceptions are addressed prior to finalizing a batch. No original paper documents received are disposed of prior to processing and verification through the controlled, secure paperless workflow system – which incorporates a multi-tier quality check through the barcoding, exception report generation, and exception correction process.

c. Specifically, after paper items are barcoded and profiled as to the type of application/correspondence, they are placed into batches of approximately 100 pages. As the pages are placed into the scanning station, any page where the barcode was not read, or if a page was not barcoded, the item is re-presented to the Scanning Clerk to “post index the item.” If a post-indexed item still does not meet barcoding requirements, the item is forwarded to the Supervisor. Any post-indexing items created because there was not a barcode affixed are sent to the Supervisor for a “second signature” signoff. This is a built-in performance review/ quality check on the employee affixing the barcodes.

d. When a batch is cleared by the Scanning Clerk, the scanning system then counts individual case numbers (i.e. 7 pages; one Veteran file number) and passes those individual case number images to the paperless workflow process. The Scanning Clerk monitors and reviews this “pass off.” If the pass off creates an error (meaning that a task will not be generated for employee work action), the Scanning Clerk intervenes so that IT corrects the issue. Upon confirming that the batch has been processed correctly, the Scanning Clerk moves on to the next batch ready to process.

### 2. Documents Processed through Insurance Imaging

a. VA Form 29-336, Designation of Beneficiary (B&O) - Government Life Insurance.

1) The B&O is the most important document received at the Insurance Center. They are delivered to the Imaging Unit and are imaged prior to assignment of any work action. If warranted post-imaging, a workflow task is generated by the imaged document and systematically forwarded to the proper assigned, individual employee.

2) The B&O is never shredded, but rather is retired for permanent retention at the National Archives.

3) All imaged B&Os must be placed in a locked area under the security of a supervisor until scanning exception reports have been reviewed and the original is sent to the National Archives for permanent retention.

b. Applications for Benefits – Forms – Insurance applications that are imaged before development and/or processing include:

<b>VA Form Number</b>	<b>Title</b>
VA Form 29-541	Certificate Showing Residence and Heirs of Deceased Veteran or Beneficiary
VA Form 29-380	Application for Protection of Commercial Life Insurance Policy
VA Form 29-8636	Veterans Mortgage Life Insurance Statement
VA Form 29-4364	Application for Service-Disabled Veterans Insurance
VA Form 29-0189	Application for Supplemental Service-Disabled Veterans (SRH) Life Insurance
VA Form 29-0188	Application for Supplemental Service-Disabled Veterans Insurance (SRH)
VA Form 29-8485	Application for Ordinary Life Insurance - Replacement Insurance for Modified Life Reduced at Age 65, National Service Life Insurance
VA Form 29-8485a	Application for Ordinary Life Insurance - Replacement Insurance for Modified Life Reduced at Age 70, National Service Life Insurance

c. In addition to the forms mentioned in the above table, also imaged are requests for loans and cash surrenders, dividend credit/deposit, refunds, and other

correspondence, faxes and emails. The procedures addressing all of these materials are outlined below:

1) Applications, requests for loans and cash surrenders, dividend credit/deposit, refunds, general correspondence, faxes and emails are permanently imaged immediately upon receipt.

2) The image is immediately and permanently safeguarded for future processing.

3) The imaged records are placed into Veterans Insurance Claims Tracking and Response System (VICTARS) paperless workflow for processing and delivered to the proper Insurance employee for processing.

4) Since these records are now imaged, the originals are now VBA approved as non-records, per the Records Control Schedule VB-1, Part I, Field, Item Number 09-000.053. The disposition of Item Number 09-000.053 states that original items will be retained and kept secure, in dated batch order for 30 days in the imaging unit. After 30 days they may be shredded.

5) The supervisor is responsible for keeping all incoming items secure until shredded.

### 3. All Other Paper Materials Not Received in the Imaging Unit

#### a. Incoming Documents Not Received Through the Imaging Unit

1) All documents that are delivered to an employee in any other manner than through the paperless workflow system must be hand carried to a supervisor immediately.

2) This includes any material solicited from Veterans and beneficiaries that is delivered directly to the employee unopened in an envelope.

3) Correspondence and/or applications received with money must be given immediately to a supervisor, who will direct them to the Collections Supervisor, who will ensure proper processing.

#### b. Items Discarded Using Red Bins

1) All paper items printed from an electronic record (that does not contain PII) that need to be dispositioned and shredded should be placed into the provided red shred bin. Employee signature is not required.

2) All paper items containing PII and printed from an electronic System of Record that clearly show the "Imaged on" header or can otherwise be clearly identified as a screen print or originating from an electronic System of Record must be signed and dated by the employee, with reason for disposal annotated on the item.

c. Items Requiring Second Signature Review by a Supervisor

1) Any paper reports that contain PII and cannot be clearly identified as originating from an electronic System of Record and/or duplicate outgoing letters containing PII that are ready to be dispositioned and shredded should be signed, dated and delivered to a supervisor for second signature review.

d. Trash Receptacles

1) Only trash (tissues, candy wrappers, etc.) will be discarded in trash receptacles.

4. VBA's Insurance Division uses a controlled, paperless environment to image and store documents submitted by claimants and others that affect benefits entitlement. Images of the hardcopy documents are captured and validated, and the paper documents are dispositioned in accordance with existing records control procedures. Disposition of all Insurance Division's imaged documents are, therefore, not subject to an additional review by local Records Management Officers (RMOs) or Records Management Technicians (RMTs). The paper material reviewed in accordance with these procedures will be submitted to the RMOs/RMTs and placed in shred bins without further review.

## Education Service Records Handling Procedures

### 1. Overview of Education Service Imaging Process

#### a. The Image Management System (TIMS)

Since April 1987, Education has used TIMS to image and electronically store incoming documents. Images of hardcopy documents are captured and validated prior to routing work items for action by employees; the paper documents are dispositioned in accordance with established records control procedures contained within the Records Control Schedule (RCS) VB-1 Part I para 07-693.010. All documents, whether received as paper or electronic, are permanently imaged and secured before being distributed for processing. This includes all applications and correspondence. Importantly this system has long demonstrated its effectiveness in both protecting Personally Identifiable Information (PII) and supporting efficient, accurate processing.

#### b. Batching Process

1) Incoming paper items are batched into categories. Each batch has a cover page affixed to it that the employee signs and dates. Each batch is then scanned into the current, secure paperless workflow system, counted, and verified through an indexing tool.

2) Specifically, after paper items are separated and batched as to the type of document, they are placed into batches of approximately 25 pages. As the pages are placed into the scanning station, the documents are scanned by batch.

#### c. Scanning Process

Education Claims Assistants (or other designee) scan each batch into TIMS and document on the cover sheet the date it is scanned. The paper batch is then returned to a secure area for the Indexing of the documents.

#### d. Indexing Process

The Claims Assistant assigned to indexing the batches is a different employee than the one who batched/scanned into TIMS. The Indexer opens the batch in TIMS and confirms the document is readable and assigns it to the appropriate claims folder or creates a claims folder if one does not exist. This is a built-in performance review quality check on the employee preparing the batch.

After all documents in each batch have been indexed to a claims folder in TIMS, the Indexer initials the batch cover sheet to confirm completion. The batches are kept in

a controlled area and a supervisor will perform a quality review on a random number of the batches to ensure compliance.

Batches are maintained for 12 months at each Regional Processing Office (RPO) before disposition in accordance with RCS VB-1, Part I, Para. 07-693.010.

## 2. Documents Processed through TIMS

a. TIMS is a management and workload processing system. All documents are submitted for the process described above and imaged immediately upon receipt. The image is immediately and permanently safeguarded for future processing.

1) The imaged records are placed into TIMS workflow for processing and routed appropriately for processing.

2) Since these documents are imaged, their disposition is authorized per RCS VB-1, Part I, Para. 07-693.010. The original items will be retained and kept secure, in dated batches for 30 days in the imaging unit. After 30 days, they are secured in another locked location within the Regional Office (RO) for another 11 months. After 12 months, they may be dispositioned according to the RCS VB-1, Part I, Para. 07-693.010.

3) The supervisor is responsible for keeping all incoming items secure until disposition.

## 3. All Other Paper Materials Not Received in the Imaging Unit.

### a. Incoming Documents Not Received Through the Imaging Unit

1) All documents that are delivered to an employee in any other manner than through TIMS must be hand carried to a supervisor immediately.

2) This includes any material solicited from Veterans and beneficiaries that is delivered directly to the employee unopened in an envelope.

### b. Items Discarded Using Red Envelopes

1) All paper items printed from an electronic record (i.e., TIMS, Benefits Delivery Network (BDN), Veterans Information System (VIS), etc.) that need to be dispositioned (**that do not contain PII**) should be placed into the provided red envelope. Employee signature is not required.

2) All paper items printed from an electronic record (i.e., TIMS, BDN, VIS, etc.) that need to be dispositioned (**containing PII**) must be signed and dated by the

employee, with reason for disposal annotated on the item and delivered to a supervisor for second signature review.

3) All paper items printed from an electronic record (i.e., TIMS, BDN, VIS, etc.) that need to be dispositioned (**containing PII**) which clearly states it is a duplicate of an imaged document (i.e. watermark on printed document) will not require the two signature review. These documents may be placed directly in the provided red envelope. \*\*Future Enhancement, currently not available for use.

4. VBA's Education Service uses a controlled, paperless environment to image and store documents submitted by claimants and others that affect benefits entitlement. Images of the hardcopy documents are captured and validated, and the paper documents are dispositioned in accordance with these existing records control procedures. Disposition of all of Education Service's imaged documents are, therefore, not subject to an additional review by local Records Management Officers (RMOs)/Records Management Technicians (RMTs). The paper material reviewed in accordance with these procedures will be submitted to the RMOs/RMTs and placed in shred bins without further review.

## **Vocational Rehabilitation and Employment (VR&E) Service Records Handling Procedures**

### **1. Overview of VR&E Service Imaging Process for Inactive Claims**

a. Beginning in fiscal year 2015 (FY2015), VR&E became actively engaged in a digital and paperless transformation as it prepares for the new VR&E Case Management System (VRE-CMS) and future integration into Veterans Benefits Management System (VBMS).

b. On June 24, 2016, the Office of Field Operations (OFO) issued guidance to Regional Offices (ROs) as it relates to folder retirement in an effort to continue VBA's strategic transformation goal of becoming completely paperless. ROs were instructed to no longer ship folders to the Records Management Center (RMC) or the National Archives and Records Administration (NARA) after September 30, 2016, or initiate any new shipments that would arrive after that date. The folders noted in this guidance included VR&E Counseling, Evaluation, and Rehabilitation (CER) folders. Instead of storing these inactive CER folders at RMCs or NARA locations, they will be scanned through the implementation of the File Bank Extraction (FBE) initiative.

c. FBE activities include the physical removal of inactive CER folders (e.g., Chapter 31, Chapter 35, Chapter 36, and Chapter 18) from the RO. Inactive CER folders are cases either in Rehabilitated, Discontinued, Closed with Counseling, and Closed without Counseling status. These CER folders are shipped to a scanning facility where the information in the CER folders is scanned to a searchable Portable Document Format (PDF) file, which is uploaded to VBMS. The scanning facility stores the physical CER folders following the completion of the scanning process.

d. The Office of Business Process Integration (OBPI), in continued partnership with OFO and the Office of Administration and Facilities (OA&F), has initiated implementation of the FBE initiative at VBA offices nationwide. Thirty-three VR&E offices are scheduled to undergo FBE activity during FY2017. It is anticipated the remaining VR&E offices will undergo FBE activity in FY2018.

### **2. Handling and Storage of Active VR&E Documents and Claims**

a. If a VR&E office receives a new application or a request to reopen a case where the associated CER folder has been scanned and is no longer physically available for use, the responsible staff member must create a new CER folder. This folder is only for the new documentation associated with the reopened VR&E claim. Staff should proceed as directed per M28R, Part IV, Section A. Please note: these are interim procedures until VRE-CMS is fully deployed, on or about FY2018.

b. VR&E employees with permanent office space are authorized to store active CER folders, along with any corresponding documents, such as applications for benefits, award-related documents, contractor or school invoices, correspondence, and other materials. This information may be stored in the following locations:

- 1) VR&E Division file bank, sensitive file locked file cabinets, and designated secure file storage locations.
- 2) File carts and sorting tables in areas that are restricted from Veteran access.
- 3) Clearly marked holding areas, such as open shelving, tables, or cabinets that are restricted from Veteran access.
- 4) Unlocked above-the-work-surface storage compartments that are part of an individual workstation.
- 5) File cabinets specifically provided to employees for the storage of cases under their jurisdiction.
- 6) Desk, on the top of a worksite credenza, or other surface clearly visible to supervisory inspection, but not visible during individual counseling sessions.

c. Loose mail or pending award or invoice documents are stored at each individual worksite in a clearly marked "Active Mail In-box" on the work surface. However, this information must not be visible during individual counseling sessions. When a case manager is meeting individually with a Veteran, only the Veteran's VR&E file may be visible on the work surface. All paper records must be stored out of view of the Veteran. The case manager must use privacy screens on computer screens to safeguard electronic information.

d. The VR&E Officer must ensure that all other information is stored in file cabinets or other systems specifically designated. In-boxes or other portable work systems should be located in an area of the VR&E staff member's office that is not visible to the Veteran. The case manager must ensure that a Veteran will not be left unaccompanied in his/her office or any area within the VR&E office. The case manager must also ensure that the Veteran is escorted to and from the designated waiting area.

e. All documents that are delivered to the VR&E office or to a VR&E employee must be triaged, and all claims documents or invoices date stamped upon receipt. This includes any material solicited from Veterans and beneficiaries that is delivered directly to the employee unopened in an envelope.

### 3. Items Discarded Using Red Envelopes and Red Shred Boxes

a. Original copies of legal documents that duplicate records in the Veteran's claims file will not be destroyed, but returned to the Veteran. VR&E employees must use the red envelopes for the disposition of claims-related materials, such as:

1) Internally generated papers that do not contain personally identifiable information (PII), such as screen or award prints, draft documents and work papers not appropriate for inclusion in the Veteran's record, and/or do not require signatures, initials, or dating, but must be placed in the employee's red shred box when submitted for shredding.

2) All paper items printed from an electronic record that need to be dispositioned and shredded that do not contain PII should be placed in the provided red shred box. Employee signature is not required.

3) All paper items printed from an electronic record that need to be dispositioned and shredded because they contain PII must be signed and dated by the employee, with reason for disposition annotated on the item and delivered to a supervisor for second signature review.

#### 4. Trash Receptacles

a. Only trash (tissues, candy wrappers, etc.) will be discarded into trash receptacles.

#### 5. Destruction Eligible Files

b. VR&E Offices are encouraged to destroy eligible CER folders per the Records Control Schedule (RCS), RCS VB-1, Part I, Field in Section VII, dated January 31, 2014. The VR&E office should work directly with its local Records Management Officer (RMO) to destroy eligible CER folders in accordance with the RCS. Each RO will be responsible for the identification and destruction of eligible files.

6. VBA's VR&E Service uses a controlled, paperless environment to image and store documents submitted by claimants or others and that affect benefits entitlement. Images of the hardcopy documents are captured and validated, and the paper documents are dispositioned in accordance with these existing records control procedures. Disposition of all VR&E Service imaged documents is, therefore, not subject to an additional review by local RMOs/RMTs. The paper material reviewed in accordance with these procedures will be submitted to the RMOs/RMTs and placed in shred bins without further review.

## **Loan Guaranty (LGY) Service Records Handling Procedures**

### 1. Overview of LGY Service Document Receipt Procedures

a. Loan Guaranty administers a number of different programs that support the purchase, preservation, and alteration of homes for Veterans and Servicemembers. LGY programs are administered through a network of regional offices with loan activities located across the Country. The Property Management Program is administered in Central Office and utilizes a Real Estate Owned and Portfolio Servicing Contract (RPSC) to manage, market, and sell VA-acquired properties.

Images of hardcopy documents are captured and validated prior to routing work items for action by employees; paper documents are dispositioned in accordance with established records control procedures contained in the VBA Records Control Schedule (VBA RCS), VB-1, Part I, Field. For the Property Management Program, any documentation is forwarded to the RPSC Contractor, who has been instructed to manage documentation in a manner that adheres to the VBA RCS.

b. Loan Guaranty paper applications and correspondence received at a Regional Loan Center (RLC) are permanently imaged and securely uploaded to a VA Benefit database(s), e.g., WebLGY, Specially Adapted Housing/Special Housing Adaptation (SAHSHA), and Veterans Benefits Management System (VBMS).

c. Electronic applications and correspondence received at an RLC are categorized by the LGY Program section that it belongs to. When electronic documentation is submitted to a specific program e-mail box or VA database, staff of the LGY program section is notified that an application is pending. Upon receipt, these documents (i.e. benefit-related documents) are subsequently uploaded to LGY program-specific databases (refer to Section 2b).

d. Paper applications and correspondence received at an RLC may be received by mail, e-mail, fax, or hand delivery. These documents are categorized by LGY Program function (Loan Production, Loan Management, Property Management, and Specially Adapted Housing). Upon receipt, these documents are permanently imaged and securely uploaded to an LGY program-specific database (refer to Section 2b).

e. The Veterans Affairs Loan Electronic Reporting Interface (VALERI) utilized by the Loan Administration Division is designed to support a paperless environment. However, when hard-copy documents are received via mail and electronic documents received via e-mail, these documents are to be uploaded to VALERI upon receipt.

f. RLCs are directed to review the LGY program-specific manual as well as the VBA RCS for records control instructions.

## 2. Handling and Storage of Active LGY Documents

a. All documentation containing personally identifiable information (PII) is securely stored in LGY electronic databases and hardcopy records (if any) are retained at the RLC by the LGY Division completing the response. Disposal of VA Home Loan records is completed in accordance with the VBA RCS. Additional information regarding handling and storage of active LGY documents can be found in LGY Program manuals located on the VA Web Automated Reference Material System website.

b. RLC employees are required to store active documents, along with any corresponding documents, such as applications for benefits, plans, specifications, appraisals, loan files, contracts, invoices, correspondence, and other materials. This information may be stored in the following locations:

- 1) Veterans Information Portal: WebLGY
- 2) Veterans Affairs Loan Electronic Reporting Interface (VALERI)
- 3) RPSC database
- 4) SAHSHA

c. RLC employees must ensure that all other information is stored and locked in file cabinets or other specifically designated systems. In-boxes or other portable work systems should be located in an area of LGY.

## 3. All Other Paper Materials Not Received Through the LGY Document Receipt Process

### a. Incoming Documents Not Received Through the RLC

1) All documents that are delivered to an employee in any other manner than through the system must be reviewed and appropriate disposition determined based on the VBA RCS.

2) This includes any material solicited from Veterans and beneficiaries that is delivered directly to the employee unopened in an envelope.

3) Documents containing PII provided to the supervisor for second signature will be secured in a red envelope and provided to the RMO/RMT for its final disposition as outlined in VBA 6300, Records and Information Management.

b. Items Discarded in Shred Bins

1) Original copies of legal documents, such as deeds, mortgage notes, powers of attorney, wills, etc., that duplicate records in the Veteran's records file will not be destroyed, but returned to the Veteran. LGY employees must use shred bins for the disposition of benefit-related materials, such as:

a. All paper items printed from an electronic record that need to be dispositioned and shredded and do not contain PII should be placed in the provided shred bin. An employee signature is not required.

b. All paper items printed from an electronic record that need to be dispositioned, and shredded because they contain PII must be signed and dated by the employee, with the reason for disposition annotated on the item, and delivered to a supervisor for second signature review.

4. Trash Receptacles

a. Only trash (tissues, candy wrappers, etc.) will be discarded into trash receptacles.

5. VBA's LGY Service uses a controlled, semi-paperless environment to image and store documents submitted that affect benefit entitlement. Images of the hardcopy documents are captured and validated, and the paper documents are dispositioned in accordance with existing records control procedures. The paper material reviewed for disposition by employees and supervisors in accordance with VBA RCS procedures will be submitted to the RMOs/RMTs for review by placing the documents signed for destruction in the red envelopes provided prior to placement in shred bins.