



DEPARTMENT OF THE ARMY  
WALTER REED ARMY INSTITUTE OF RESEARCH  
503 ROBERT GRANT AVENUE  
SILVER SPRING, MD 20910-7500

REPLY TO  
ATTENTION OF

MCMR-UWZ

26 January 2012

MEMORANDUM FOR (SEE DISTRIBUTION)

SUBJECT: WRAIR Policy Letter 12-02, Records Management

**1. REFERENCES:**

- a. AR 25-1, Army Knowledge Management and Information Technology, dtd 4 Dec 08
- b. AR 25-400-2, the Army Records Information Management System (ARIMS), dtd 2 Oct 07
- c. AR 340-21, The Army Privacy Program, dtd 5 Jul 85
- d. AR 25-55, The Department of the Army Freedom of Information Act Program, dtd 1 Nov 97
- e. AR 380-5, Department of the Army Information Security Program, dtd 29 Sep 00
- f. DA PAM 25-403, Guide to Recordkeeping in the Army, dtd 11 Aug 08
- g. AR 27-60, Intellectual Property, dtd 1 Jun 93, dtd 22 Mar 01
- h. WRAIR Policy Letter 96-13 Laboratory Notebooks
- i. WRAIR Policy Letter 08-08, Management of Records for Research Involving Human Subjects, dtd 25 Jul 08

**2. Purpose:** The Walter Reed Army Institute of Research (WRAIR) generates numerous records that must be efficiently managed throughout the record's life cycle. This includes filing, safeguarding, archiving, and finally, disposing of the records. This policy letter establishes responsibilities and procedures for the management of records (See definition section for a complete description) in accordance with Army Regulation (AR) 25-400-2 and other relevant regulations.

**3. APPLICABILITY:**

- a. This policy applies to all WRAIR branches, programs, overseas

**This Policy Letter supersedes WRAIR Policy Letter 09-01, dated 9 January 2009.**

MCMR-UWZ

SUBJECT: WRAIR Policy Letter 12-02, Records Management

labs, detachments, administrative offices, and to all WRAIR military, civilians, contractors, and affiliates who create, receive, or maintain records as part of their work on behalf of WRAIR. For this policy, records are defined as those covered by AR 25-400-2 (ARIMS), and may include paper records, transportable media such as cassettes, CDs, and DVDs used to store records for the administrative and research branches at WRAIR.

b. This policy does not include chemicals or biological specimens. Electronic records will be the subject of a separate Policy Letter.

#### **4. RESPONSIBILITIES:**

a. Commander, WRAIR - The Commander establishes a compliant environment, provides adequate resources, ensures that records management requirements have been fully explained, and appoints a Records Management Specialist.

b. Branch Directors, Detachment or Overseas Lab Commanders, or equivalent:

c. Branch Directors oversee records management in their branches. They ensure that staff is trained and that appropriate security measures are observed for maintaining records. They appoint Record Coordinators and oversee record generators. If either a Records Coordinator or record generator leaves, the Director appoints a responsible party to assume the appropriate responsibilities.

d. Records generator - Records generators will have primary responsibility for the records, in consultation with the Records Coordinator and Records Management Specialist, throughout the records' life cycle. Records generators initiate good records management practices compliant with regulations and requirements and oversee storage and disposition of records. Upon out-processing, they ensure proper disposition of records or transfer of records to a responsible party.

e. Records Coordinator - Records Coordinators, who possess current knowledge of ARIMS, ensure implementation of record-keeping procedures throughout their branches. They maintain appropriate files as required by ARIMS, serve as liaison between records generators, the Records Management Specialist, and the Archivist, if applicable. They review files regularly for eligible paper records to be archived and advise the Records Management Specialist when there are records to be archived off-site.

f. Records Management Specialist - The WRAIR Records Management Specialist serves as the local authority for ARIMS, manages WRAIR record-keeping activities, assists in determining the proper retention and disposition of records, manages submission and transfer of records to the official records holding area (RHA) and the Washington National Records Center (WNRC), and maintains a log of WRAIR records at WNRC.

**This Policy Letter supersedes Policy Letter 09-01, dated 9 January 09.**

g. Archivist - The Archivist checks records and reviews accompanying disposition documentation prior to accepting them for local archives. The Archivist keeps a database of archives contents, controls access to archives, coordinates records transfers to other facilities and the destruction of records.

## **5. GENERAL:**

a. WRAIR records are retained as required to meet the legal, administrative, regulatory, scientific, intellectual property, and operational requirements of WRAIR, after which time the records are destroyed, transferred to another owner, or transferred to an external archives facility. Records should be considered for archiving if they are not needed for current business activities or have not been accessed during the previous year. Records should not accumulate beyond what is required by regulatory or business needs.

b. Identifying Record-keeping Requirements - Records will be managed as defined in Army regulations, such as AR 25-400-2 (ARIMS). Some records may fall under authorities in addition to the Army, such as the Food and Drug Administration (FDA) or host country authorities. In instances where there are gaps in, or a need to deviate from, Army regulations, the records generator should consult with appropriate WRAIR resources to determine requirements for record-keeping. Resources include the WRAIR Records Management Specialist, Records Coordinators, the Offices of Quality Activities and Business Plans and Programs, the Resource Management Branch, the Regulated Activities Branch, and the Human Subjects Protections Branch. Any recommended solutions should be communicated to the WRAIR Records Management Specialist. Once retention schedules have been established that are in compliance with the applicable regulations and authorities, the records are sent to the Records Coordinators or other designated representatives of WRAIR Branches who are responsible for applying the requirements to their records. Branch Directors, records generators, and Records Coordinators should ensure they are able to accommodate records retention and safeguarding requirements.

c. Filing Procedures - Records will be filed and stored in an organized fashion with appropriate labeling in a secure environment. Records generators will work with the Branch Records Coordinator, the WRAIR Records Management Specialist, and the Archivist to store records locally. The records generator will review the status of stored records once a year. Ideally, each WRAIR facility will establish archives managed by an Archivist who works closely with the WRAIR Records Management Specialist. Records will not be accepted in the archives unless defined criteria are met, including plans for disposition.

d. Unsecured records: Any WRAIR military, civilian, contractor, or affiliate who discovers, finds, or otherwise receives WRAIR records will be responsible for the records.

**This Policy Letter supersedes Policy Letter 09-01, dated 9 January 09.**

The responsibility is from the time of discovery, finding or receipt, until the records are turned over to a Records Coordinator for final disposition in accordance with the provisions of this policy.

e. Disposition - The final disposition of records is either destruction or permanent transfer either to the National Archives or a partner with legal rights, carried out according to approved retention schedules or with the approval of the Records Management Specialist.

(1) Transfer of records to an external official records holding area (RHA) or Federal Government archives facility – Washington National Records Center (WNRC), 4205 Suitland Parkway, Suitland, Maryland 20746-8001.

(a) Records center facilities administered by the National Archives and Records Administration identified in AR 25-400-2 are the preferred sites for long-term and permanent records storage of WRAIR paper records generated in the Washington, DC area or overseas detachment office. Use of a records center is available at no cost to WRAIR, and includes records destruction as appropriate. The Records Management Specialist and records generators (or Records Coordinators) together will prepare and submit the records to the WNRC. The Records Management Specialist will track the records through destruction and communicate changes in status to the Records Coordinators and to the records generators.

(b) Other records storage sites outside the United States may be used, if required by host country laws or regulations.

(2) Transfer of records to a partner: Appropriate records may be transferred to partners that have legal rights to the records through Cooperative Research and Development Agreements (CRADAs), Memoranda of Understanding (MOUs) or other agreements. The transfer of records will occur only after all business, legal, and regulatory responsibilities are met.

(3) Destruction: Records that are "For Official Use Only" (FOUO), and/or contain personally identifiable information (PII) or personal health information (PHI) will be destroyed by shredding or burning.

(4) Discard in the trash or recycle: Only records containing no PII, PHI, or FOUO information may be disposed of this way.

(5) Destruction of personnel (civilian and military) records: Employee files are copies, not original records, and maintained by WRAIR branch records coordinators for one year after an employee leaves WRAIR, then that individual's file is shredded.

**This Policy Letter supersedes Policy Letter 09-01, dated 9 January 09.**

Original personnel records are maintained in the WRAIR Human Resources Division by the records coordinator, per the ARIMS category's disposition.

**6. DEFINITIONS AND ABBREVIATIONS:**

a. Records - All papers or other documentary materials made or received by WRAIR in connection with the transaction of public business and preserved or appropriate for preservation by WRAIR or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of WRAIR or because of the informational value within the data. Examples include personal information, personnel records, laboratory notebooks and data, financial records, safety records, human subjects protection records, and FDA regulated records. Examples of official records specifically excluded include intentionally published materials, records released for publication by a competent military authority, private records of a personal or interpersonal nature, and common office records not secured under the regulations noted above. Library and museum material solely for reference or exhibition purposes are also not included.

b. Records generator - A person who creates or is otherwise responsible for the records. Examples are supervisors, investigators, technicians, credit card holders, principal investigators of clinical trials, and study directors of animal experiments. For Official Use Only (FOUO): A classification used to protect privileged or confidential information, not needing the full protection warranted by classified records from unauthorized disclosure. See AR 25-55 for types of information that may be categorized as FOUO.

c. Administrative records - Records relating to budget, personnel, supply and similar housekeeping, or facilitative functions, common to most agencies.

d. Personally identifiable information (PII) - Any information about an individual which can be used to distinguish or trace the individual's identity, such as name, social security number, date and place of birth, mother's maiden name, and biometric records. This includes, but is not limited to, education records, financial transaction records, medical files, criminal records, or employment history.

e. Retention Schedules - Approved document that describes WRAIR's records and indicates the length of time each shall be retained as active before transfer to semi-active storage, the length of time each should be retained as semi-active prior to final disposition, and the final disposition of each record. This document serves as the legal authorization for the disposal of public documents.

f. Records Coordinator - A Records Coordinator is designated by a WRAIR Branch

**This Policy Letter supersedes Policy Letter 09-01, dated 9 January 09.**

MCMR-UWZ

SUBJECT: WRAIR Policy Letter 12-02, Records Management

Director by a Duty Appointment Order to handle records management program execution in each Branch and Program. This term is from AR 25-400-2.

g. Records Management Specialist - A Records Management Specialist serves as the local authority for recordkeeping subprogram procedures/issues. See AR 25-400-2 and DA PAM 25-403 chapter 1-6.b.

7. **POINT OF CONTACT:** Point of contact for this Policy Letter is Ms. Roberta J. Nicolella, Records Management Specialist, telephone: 301-319-9697, email: [roberta.nicolella@us.army.mil](mailto:roberta.nicolella@us.army.mil).

**Signature on File**

RALPH L. ERICKSON  
COL, MC  
Commanding

DISTRIBUTION: A & B

**This Policy Letter supersedes Policy Letter 09-01, dated 9 January 09.**