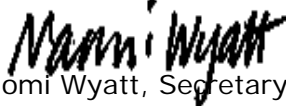


MANAGEMENT DIRECTIVE

Commonwealth of Pennsylvania Governor's Office

Subject: The Commonwealth of Pennsylvania State Records Management Program	Number: 210.5 Amended
Date: July 29, 2010	By Direction of:  Naomi Wyatt, Secretary of Administration
Contact Agency: PA Office of Administration, Office of Enterprise Records Management (OERM), Telephone 717-783-5055	

This directive contains policy, responsibilities, and procedures for records management, including records created in electronic messaging systems. This amendment revises the Purpose, Scope, Objectives, Definitions, Policy, Responsibilities, and Procedures sections. Changes are indicated by marginal dots.

1. **PURPOSE.** To establish policy, responsibilities, and procedures for the State Records Management Program, including paper, electronic records and other formats.
2. **SCOPE.** Applies to all agencies subject to *The Administrative Code of 1929*, agencies under the Governor's jurisdiction and entities that store records at the State Records Center (SRC). Other state entities are encouraged to follow this directive.
3. **OBJECTIVES.** To provide guidance, definition and documentation of policies to ensure that:
 - a. All state employees and departing employees are aware of their responsibilities for appropriate records management;
 - b. All records are identified and scheduled on approved records retention and disposition schedules;

- c. All records are managed, retained and disposed of in conformance with approved records retention and disposition schedules;
- d. Permanent/archival records are identified, preserved, and accessible;
- e. Vital records are properly identified and protected; and
- f. All records are managed efficiently, minimizing the cost of doing government business while assuring access.

4. DEFINITIONS.

- a. **Active Records.** Records used to conduct current operations.
- b. **Agency File Plan.** A tool used by agency employees to manage their records in accordance with general and agency specific records retention and disposition schedules that provides bureau/office guidance to include bureau/office-specific record retention, disposition, record location, media type, and a designated record custodian, to ensure that all agency employees properly manage records under their care and control.
- c. **Agency Open Records Officer (AORO).** The official or employee designated by the agency head to receive and respond to *Right-to-Know Law* (RTKL) requests.
- d. **Agency Records Coordinator.** The employee appointed by the agency head to have agency-wide responsibility for managing and coordinating the agency's records management program. See [Manual 210.7, State Records Management Manual](#).
- e. **Agency Records Legal Liaisons.** Agency counsel assigned by the Agency Chief Counsel to provide legal guidance to the Agency Records Coordinator and Agency Open Records Officer (AORO) with RTKL responses and to assist with records issues.
- f. **Data.** Symbols or representations of facts or ideas that can be communicated, interpreted, or processed by manual or automated means, and often associated with electronic data or with statistics or measurements.
- g. **Disposition.** The changing of custody, location, or existence of records including transfer to the SRC; transfer of permanently valuable records to the State Archives; transfer of electronic records to a different storage system; or destruction.
- h. **Disposition Code.** A code used to direct the final disposition of records. Records must be disposed of in accordance with the assigned disposal code listed on approved records retention and disposition schedules. For specific details, refer to [Manual 210.9, The Commonwealth of Pennsylvania General Records Retention and Disposition Schedule](#).

- i. **Electronic Messages.** Information that is created, stored, and delivered in an electronic format. Types of electronic message may include the following: e-mail, text messages, discussion threads, digital voice mail, blogs, and message boards.
- j. **Electronic Record.** A record created, generated, sent, communicated, received, or stored by electronic means.
- k. **Executive Board.** The Executive Board consists of the Governor, as Chairman, and six other heads of departments. It has the power and authority in the administrative and executive functions directed to be performed under provisions of §506 of *The Administrative Code of 1929*.
- l. **Human-Readable Format.** The representation of information that can be read with the human eye and does not require machine (computer) assistance. Printed material, microfilm and microfiche are examples of human readable format.
- m. **Inactive Records.** Records that are not needed for ongoing agency business or that are accessed relatively infrequently, but whose retention period has not yet expired.
- n. **Information System.** The organized collection, processing, transmission, and dissemination of information in accordance with defined procedures, whether automated or manual.
- o. **Long-term records.** Records that must be maintained for ten years or more.
- p. **Non-records.** Information that does not meet the definition of a record as defined in this Management Directive (MD). These materials relate to non-government business or activities and may include items such as announcements of community events and personal e-mails. Non-records may also include publications such as trade journals, pamphlets, and reference materials received from outside organizations, conferences, and workshops.
- q. **Official Records.** Records that reflect the position or official business of an organization and that are to be retained by a designated records custodian in accordance with the appropriate records retention and disposition schedule.
- r. **Permanent/Archival Records.** Records appraised by the Pennsylvania Historical and Museum Commission (PHMC) as having sufficient historical, administrative, or legal value to warrant continued preservation by the commonwealth.
- s. **Preservation of Records.** The process and procedures used to ensure historical records are kept from harm, injury, decay, or destruction while remaining accessible.

- t. Record.** Information, regardless of physical form or characteristics, that document a transaction or activity of an agency and that is created, received or retained pursuant to law or in connection with a transaction, business or activity of the agency. The term includes a document, paper, letter, map, book, tape, photograph, film or sound recording, information stored or maintained electronically, and a data-processed or image-processed document.
- u. Record Custodian.** Any person having custody, possession or control of a record.
- v. Record-Keeping Requirements.** The prerequisites needed to manage records regardless of format, throughout the creation, maintenance, and disposition of a record.
- w. Records Legal Hold.** The suspension of ordinary practices and procedures for disposing of records, as necessary, to comply with existing preservation obligations related to actual and reasonably anticipated litigation, government investigation, or audit.
- x. Records Management.** The planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, records maintenance and use, and records disposition in order to achieve adequate and proper documentation of the policies and transactions of the commonwealth for an effective and economical management of agency operations.
- y. Records Retention and Disposition Schedules.** A comprehensive statement approved by the Executive Board showing retention periods and all actions to be taken with respect to disposition of records. The schedule lists each record series, indicates length of time each series is to be maintained in a prescribed format, and the location where the records are to be stored. There are two types of records schedules used by state agencies to control records: general and agency-specific. General schedules identify record series common to most agencies. Agency-specific schedules identify unique record series created by an agency.
- z. Record Series.** A group of records that may be treated as a unit for purposes of classification, designation, description, management, or disposition because they relate to a particular subject or function, result from the same activity, have a particular physical form, or because of some other relationship arising out of their creation, receipt, or use.
- aa. Senior Management Employee.** An agency head, deputy secretary or equivalent, chief counsel, bureau director or equivalent and members of boards or commissions.
- bb. Series or Item Number.** A unique number assigned to designate a record series when creating or revising a records retention and disposition schedule.

- cc. **Transitory Records.** Records that have little or no documentary or evidential value and that need not to be set aside for future use; have short term administrative, legal or fiscal value and should be disposed of once that administrative, legal or fiscal use has expired; or are only useful for a short period of time, perhaps to ensure that a task is completed or to help prepare a final product. For more detail, refer to [Manual 210.9, The Commonwealth of Pennsylvania General Records Retention and Disposition Schedule](#).
- dd. **Vital Records.** Records needed to support critical functions during a Continuity of Operations (CoOP) event, to recover full operations following an emergency, and to protect the legal rights and interests of citizens and government. The two basic categories of vital records are emergency operating records (e.g. plans and directives, orders of succession, delegations of authorities and staffing assignments) and legal and financial records.

5. POLICY.

- a. **Employees and Records Management.** All Commonwealth of Pennsylvania employees are to manage records under their care and control on an ongoing basis to ensure proper records management, retention and disposition.
 - (1) **Employee Orientation.** New or transferred employees are to review the policies, responsibilities, and procedures in this Management Directive and [Manual 210.1, The Commonwealth of Pennsylvania Employee Records Management Manual](#), to ensure adequate knowledge of records management requirements.

Note: For guidance for supervisors and managers refer to [Manual 210.1, The Commonwealth of Pennsylvania Employee Records Management Manual](#).

- (2) **Employee Separation.** The departing employee, supervisor, and/or manager shall work together to verify that the appropriate records remain with the agency, pursuant to records retention and disposition schedules, including e-mail records, and shall do the following:
 - (a) Consult with the Agency Records Coordinator in determining proper disposition of records;
 - (b) Ensure that agency records under the control of the departing employee, including e-mails and other electronic records, are transferred to the control of the supervisor (i.e. moved from the network drive of the employee to the network drive of the supervisor or that paper records are left in the office of the departing employee) or otherwise retained for the successor employee following appropriate records retention and disposition schedules;
 - (c) Have an agency designated representative review requests for employees to copy records for personal use or to remove non-records in the employee's custody;

- (d) Notify the departing employee of the results of such review and direct what records may be copied and what non-records may be retained by the employee. The employee may appeal the decision of the supervisor to the Agency Chief Counsel or designee; and
- (e) Comply with restrictions on the copying or destruction of records that may be subject to a litigation hold, audit reporting requirements, confidentiality provisions, archival review or other considerations noted in the appropriate general or agency-specific records retention and disposition schedules.

Note: For guidance for employees, supervisors, and managers refer to [Manual 210.1, The Commonwealth of Pennsylvania Employee Records Management Manual](#).

(3) Separation of Senior Management Employees. Senior Management Employees are to comply with the direction set forth in Section 5(a)(2), above. The following additional measures apply to ensure that records are not inappropriately taken upon departure. The Agency Chief Counsel or a person delegated by the Chief Counsel is to verify in writing both to the agency head and to the General Counsel, or their designees, at least seven business days prior to the departure of any Senior Management Employee, that the employee has been advised as follows:

- (a) That the Senior Management Employee shall provide to the agency head and the General Counsel, or their designees, at least five business days prior to departure, a written summary of any records remaining in the employee's sole possession or control, as of that time, and any records that the employee wishes to retain for personal use after departure;
- (b) That a decision as to which records the Senior Management Employee may retain after departure shall be made by the agency head and General Counsel, or their designees; and
- (c) That the Senior Management Employee shall notify the Agency Chief Counsel of and provide to that office any records either designated as necessary for litigation purposes or that are reasonably likely to be subject to litigation, investigations, subpoenas, or discovery requests.

b. Agency File Plan. Beginning July 1, 2011 and thereafter on a five-year basis, all agencies and entities within the scope of this Management Directive are to submit a copy of an approved Agency File Plan to the Office of Enterprise Records Management (OERM).

- (1) The Agency File Plan shall include at least a list of all record series from the general and agency-specific records retention and disposition schedules used by the agency, defined by bureau/office; record media type; record custodian; and record location.
- (2) The Agency File Plan is to be approved in writing by the agency head when submitted to OERM.

(3) The Agency File Plan is to be kept current.

c. **New Record Types.** Before a new document or record type is created or used in a new or revised process or information system, or as soon as possible thereafter, the agency shall conduct an analysis of the document or record type produced by the process or information system throughout each stage of the records life cycle. This analysis should include a determination of the value of the record (vital, archival, permanent, non-permanent, etc.) and its retention requirements (including duration, format and location). Upon completion of the records analysis, new record types should immediately be added to the Agency File Plan and any revision to the agency-specific records retention and disposition schedule shall be initiated in a timely manner.

d. **Records Maintenance and Use.**

(1) All records, regardless of media, must be identified and maintained in accordance with general and agency-specific records retention and disposition schedules.

(2) Where appropriate, microforms, scanning and computer technology shall be used as part of the normal course of doing business for records management purposes. Such usage may be applied as replacement for and/or in lieu of hard copy, and resulting formats must be retained in accordance with general and agency-specific records retention and disposition schedules. The recording and/or processing of records in these formats shall meet specified retention requirements and provide for the retention of a hard copy as may be required for long-term records.

(3) Appropriate measures must be taken to maintain confidentiality of records in order to protect the privacy of individuals, employees, taxpayers, clients, or service recipients.

(4) All retention periods in the general and agency specific records retention and disposition schedules are to reflect at least the minimum legal, fiscal, and administrative (operational) business requirements.

(5) Electronic records, including electronic messages, designated by PHMC as having permanent/archival value, shall be maintained in human-readable format, as well as any other media types or format. The creating agency shall retain the records permanently or until such time as they may be scheduled for transfer to the State Archives.

(6) All commonwealth records must be maintained in such a way that they are readily retrievable, in facilities that provide a suitable environment to protect them from damage, deterioration and loss, and are in compliance with the applicable records schedules.

(7) Records, including inactive records, are to be accessible within five business days, to allow for a timely response to any RTKL request.

e. **Inactive Records Storage.** Inactive records must be stored so records are readily retrievable, in facilities that provide a suitable environment to protect them from damage, deterioration or loss.

(1) **State Records Center (SRC) Storage Fees.** Agencies with inactive records stored at the SRC shall pay a storage fee to support the SRC operations and services based on a per box charge. The SRC does not charge additional fees for disposal or retrieval. In instances where records are removed from SRC storage, in accordance with an Executive Board approved records retention and disposition schedule, removal will coincide with SRC's normal disposal cycle. The SRC storage fee shall be payable annually and be based on a computation as follows:

(a) SRC Operating Costs/Service Data (boxes stored) = Annual Service Rate (ASR).

(b) ASR x Agency Usage (boxes stored by each agency) = Agency Billing Amounts.

(2) **SRC Retention.** No agency with records scheduled for retention at the SRC may store those records in another location unless a records action amending the records retention and disposition schedule for those records has been approved by the Executive Board, in accordance with *The Administrative Code of 1929*, and by the State Records Committee as defined in this Management Directive.

(3) **Agency Obligations for non-SRC Storage of Inactive Records.** State Records Committee and Executive Board approval of an agency records action seeking non-SRC storage shall be contingent upon a demonstration that the storage facility comports with requirements set by the State Records Committee, which are published on the PHMC Web site and that either the fees for such storage are lower than fees for storage at the SRC or there is another compelling reason for using an alternate storage location. Requirements for non-SRC records storage facilities will include specific considerations regarding building construction, environment, security/protection and access.

f. **Disposition.**

(1) Records are to be disposed of according to applicable disposition codes provided by the appropriate records retention and disposition schedule.

Note: Records subject to a records legal hold or that are reasonably likely to be involved in litigation shall not be disposed of without approval from Agency Chief Counsel. Consult with your Agency Records Legal Liaison for direction.

(2) Disposition actions should be appropriate to the media upon which the records reside, agency business needs, record's security classification and archival value.

(3) Unscheduled records cannot be destroyed until approval is received from the Executive Board and PHMC.

- g. Records Legal Hold.** Agencies are to establish and uphold policies and procedures in coordination with the Agency Records Legal Liaison for records legal hold to ensure that the records will not be destroyed or reformatted until the event resulting in the records legal hold has concluded and all appeal periods are exhausted.

 - (1) Procedures must include the preparation of reports or lists identifying such records and the circulation of this information to all agency employees that may hold the records subject to records legal hold.
 - (2) Records involved in a record legal hold must be retained for the duration of the legal action, even if the records exceed the relevant records retention and disposition schedule requirements.

- h. Discovery and Disclosure.** Agencies are to establish and update policies and procedures in coordination with Agency Records Legal Liaison, Agency Records Coordinator, and Agency Chief Information Officer to process discovery and disclosure requests, including RTKL requests, for commonwealth records that include policy and procedures:

 - (1) Identifying employee roles in the process.
 - (2) Notifying employees of a records legal hold.
 - (3) Providing for the redaction of sensitive and/or non-public information from records.

- i. Electronic Messaging System.** Records maintained in an electronic messaging system must be managed appropriately based on their content.

 - (1) Electronic messages are not a single record series; their retention and disposition depends on the function and content of the individual message.
 - (2) Records created in electronic messaging systems must be retrievable and available for the retention period listed on the appropriate, approved records retention and disposition schedules.
 - (3) Messages in the in-box should be limited to very short term transitory messages with a retention value of three months or less.
 - (4) Messages with a retention value longer than three months, but less than ten years, may be maintained in .pst files or in another appropriate location and format that is backed-up regularly and provides security from inappropriate access.
 - (5) Messages with a permanent retention, a retention period of ten years or more, or which may be archival (disposal code of 2 or 4) can be printed or maintained according to Section 5(d)(5) in this Management Directive.

- **j. State Records Management Performance Program.** The State Records Management Performance Program is to be administered by OERM and provide for policy review, assessments tools, and methods for examination of state agency records management programs to ensure state agencies are sufficiently capturing and managing records that document commonwealth business.
- **(1) Review.** Beginning July 1, 2010 and every five years thereafter, OERM shall review the State Records Management Program policies and procedures and records retention and disposition schedules to determine the degree to which outcomes defined in the program are met.
- **(2) Assessment.** Beginning July, 1 2011 and every five years thereafter, through various survey instruments, on-site interviews, agency file plan review, and agency records management self-assessment results, OERM shall assess state agency records management programs for evidence of proficient performance.
- **(3) Performance Standards.** These standards will be used as the criteria in evaluating proficient performance.
 - **(a)** Records are maintained and disposed of in accordance with valid records retention and disposition schedules.
 - **(b)** Agency has evidence of internal policies, training and procedures for managing agency records.
 - **(c)** Records are retrieved in a reasonable amount of time.
 - **(d)** Agency records management program is managed and planned with the involvement and support of agency heads, senior management, Agency Records Coordinator, Records Legal Liaisons, Agency COOP Manager, and IT.
- **k. Use of Management Directive.** This Management Directive should be used in conjunction with [Executive Order 1992-1, Records Management, Administrative Code of 1929](#), the *History Code (Title 37 of Pennsylvania Code)*, other related Management Directives, Manuals, Information Technology Bulletins and applicable provisions of the *Pennsylvania Right-To-Know-Law, 65 P.S § 67.101, et seq.*

6. RESPONSIBILITIES.

- a. The Secretary of Administration** shall issue all directives (i.e. Management Directives, Manuals and General Records Retention and Disposition Schedules) regarding the State Records Management Program.

b. The PA Office of Administration, Office of Enterprise Records Management shall:

- (1)** Administer the State Records Management Program as designated by the Secretary of Administration, by working collaboratively with agencies to draft policies, standards and procedures to control the creation, use, maintenance, transfer, microfilming, scanning, preservation, and retention and disposition of records, including electronic records (information).
- (2)** Administer the State Records Management Performance Program.
- (3)** Advise the Secretary of Administration and members of the State Records Committee on the development of policies and procedures and on the overall administration and evaluation of the State Records Management Program.
- (4)** Advise the Executive Director of PHMC on the development of policies and procedures that may affect the implementation of the State Records Management Program.
- (5)** Issue reports, as needed, on the results of the State Records Management Program reviews, including the compliance of specific agencies, and on the overall effectiveness of the State Records Management Program.
- (6)** Conduct studies, as needed, pursuant to *Section 527 of The Administrative Code of 1929*, of the accumulation of records in the possession of agencies.
- (7)** Serve, in coordination with the PA Office of Administration, Office for Information Technology (OA/OIT) and PHMC as a central clearinghouse for information on the State Records Management Program.

c. The State Records Committee shall:

- (1)** Consist of:
 - (a)** Chief of the Office of Enterprise Records Management (chair)
 - (b)** State Archivist
 - (c)** OA/OIT representative
 - (d)** Office of General Counsel (OGC) representative
 - (e)** State Library representative
 - (f)** PHMC electronic records policy representative
 - (g)** Enterprise Records Manager (secretary)

- (h) Agency representatives from three separate agencies to be appointed by the chair every two years.
- (2) Meet every two months, or as needed, to review and approve General Records Retention and Disposition Schedule ("General Schedule") records actions to be submitted to the Executive Board.
- (3) Meet, as needed, to develop policies and procedures and to discuss issues relating to the overall administration and evaluation of the State Records Management Program.
- (4) Meet annually, in June, to advise the Secretary of Administration on the results of the overall administration and evaluation of the State Records Management Program.
- (5) Review and approve records action requests for exceptions to the General Schedule for retention periods and storage location.

d. The Pennsylvania Historical and Museum Commission shall:

- (1) Work with OERM to regularly assess and seek to improve records management procedures, guidelines, and standards.
- (2) Work with agencies on the development of records inventories and recommend appropriate retention periods and disposition to be submitted to the Executive Board.
- (3) Appraise agency records for permanent or historical value and work with agencies to preserve these records. Upon agreement by the agency and PHMC, transfer records to the State Archives.
- (4) Be responsible for the designation, management and preservation of records of permanent or historical value.
- (5) Train Agency Records Coordinators and Agency Records Legal Liaisons in records management practices.
- (6) Work with the PA Office of Administration, Office of Human Resources Management, to develop records management training for state employees other than Agency Records Coordinators and Agency Records Legal Liaisons.
- (7) Administer the Enterprise Records Management System (ERMS) which manages all commonwealth records retention and disposition schedules.
- (8) Manage the SRC to provide adequate safety, security, and space for storage of inactive commonwealth records.

e. The Executive Board shall:

- (1) Review and approve the general and agency-specific records retention and disposition schedules.
- (2) Review and approve requests for microfilming of records.

f. Agency Heads shall:

- (1) Ensure that an agency records management program is established and maintained.
- (2) Appoint an Agency Records Coordinator, according to guidelines provided in [Manual 210.7, State Records Management Manual](#) to have agency-wide responsibility for managing and coordinating the agency records management program.
- (3) Provide for all necessary support, staff and agency authority for the Agency Records Coordinator to carry out designated records management responsibilities.
- (4) Ensure that the agency submits an Agency File Plan to OERM and complies with [Manual 210.7, State Records Management Manual](#).

g. Agencies shall:

- (1) Be responsible for supporting agency employees in developing and adhering to the agency records management program.
 - (a) Delineate record and non-record information within the agency.
 - (b) Outline program responsibilities.
 - (c) Oversee management of agency records.
- (2) Ensure that employees are trained and comply with requirements, policy and procedures for the State Records Management Program.
- (3) Ensure that electronic records, including electronic messages, are:
 - (a) Organized and maintained in such a manner as to ensure accessibility over time in order to meet business/legal requirements, technology migration requirements, and user expectations.
 - (b) Maintained in such a way to preserve the integrity of electronic records, including electronic messages along with attachment(s) in a safe and secure environment.
 - (c) Retained following an approved commonwealth records retention and disposition schedule; non-records should be deleted immediately and transitory records should be deleted once their short-term business value has ended.
 - (d) Reviewed regularly to determine retention requirements and compliance with disposal codes.

- (e) Appropriately maintained for those records designated by PHMC as having permanent/archival value. This shall include provision for maintenance of such records in human-readable format. The creating agency shall retain the records permanently or until such time as they may be scheduled for transfer to the State Archives.

h. Agency Chief Counsel shall report to the General Counsel in compliance with the section of this Management Directive regarding departing Senior Management Employees.

7. Related Guidance/References.

- a. Manage commonwealth records using the procedures set forth in [Manual 210.7, State Records Management Manual](#).
- b. Manage vital records using the guidelines provided in [Manual 210.8, Vital Records Disaster Planning](#).
- c. Agency employees are to create and maintain their individual records in accordance with procedures and instructions issued through [Manual 210.1, The Commonwealth of Pennsylvania Employee Records Management Manual](#).
- d. Requests for filing equipment are to be processed in accordance with instructions issued through [Management Directive 210.6, Selection, Acquisition, and Use of Filing Equipment](#).
- e. Agencies must comply with the RTKL.
- f. Authorized Users that have access to commonwealth IT Resources must comply with [Management Directive 205.34, Commonwealth of Pennsylvania Information Technology Use Policy](#).
- g. Reference should be made to the following Information Technology Bulletin (ITB's):
 - (1) **Electronic Information Privacy Officer.** *ITB-PRV001 and ITB-PRV002* (Each agency is to identify and designate a commonwealth employee who will serve as the agency's Electronic Information Privacy Officer.)
 - (2) **Information Security Officer (ISO).** *ITB-SEC016* (Each agency is to appoint an Information Security Officer, and to provide guidance on the appointment and responsibilities of that individual.)
 - (3) **Electronic Record(s).** *ITB-INFRM001* (Electronic record or data life cycle management is the management of information that is in an electronic format throughout its existence – from creation to final disposition – across various systems and media and within various operational constraints.)
 - (4) **Web Records.** *ITB-INFRM004* (All web content, including but not limited to forms, policy, charts, graphics, announcements, is to be inventoried, analyzed to define records series, maintained and disposed of in accordance with approved records retention and disposition schedules.)

- (5) **Electronic Information Systems.** *ITB-INFRM005* (New information systems are to address records management needs as a part of cost estimates and high-level project objectives and descriptions during the Communities of Practice (CoP) or other internal and external reviews.)
- (6) **Electronic Document Management Systems (EDMS).** *ITB-INFRM006* (Before procuring an EDMS it is mandatory to consider and evaluate the use of an EDMS solution for business processes that necessitate simultaneous access and management of documents and files, conversion of hardcopy materials to electronic images, or automatic workflow processes.)
- (7) **Non-approved storage facility or non-approved storage device.** *ITB-SEC019* (Under no condition are "C" designated electronic records (sensitive security, protected, or exempt information) to be stored in a non-approved storage facility or on a non-approved storage device.)

This directive replaces, in its entirety, *Management Directive 210.5*, dated May 20, 2010.