SUBJECT:  Records Management Program

References:  See Enclosure 1.

1. PURPOSE.  This Defense Health Agency-Administrative Instruction (DHA-AI), based on the authority of References (a) and (b), and in accordance with the guidance of References (c) through (m), establishes Defense Health Agency’s (DHA) program responsibilities and procedures for the DHA Component Records Management Officer (CRMO) and Office Records Liaisons (RLs).

2. APPLICABILITY.  This DHA-AI applies to all DHA personnel to include: military, federal civilians, contractors (when required by the terms of the applicable contract), and other personnel assigned temporary or permanent duties at DHA, to include intermediate management organizations, markets, and Military Medical Treatment Facilities (MTFs) under the authority, direction, and control of the DHA.

3. POLICY IMPLEMENTATION.  It is DHA’s policy, pursuant to References (f) through (k), that any personnel, regardless of affiliation (government, contractor, active enlistment, etc.), working within DHA in support of Records Management shall adhere to the procedures established and outlined in this DHA-AI.  Additionally, policies, plans, programs, and tactics will be shared with offices for installations supported by MTFs under the authorization, direction, and control of the DHA.

4. RESPONSIBILITIES.  See Enclosure 2.

5. PROCEDURES.  See Reference (j).

7. **EFFECTIVE DATE.** This DHA-AI:

   a. Is effective upon signature.

   b. Will expire 10 years from the date of signature if it hasn’t been reissued or cancelled before this date in accordance with Reference (c).

8. **FORMS**

   a. The following SD forms are available from [https://www.esd.whs.mil/Directives/forms/sd_forms/](https://www.esd.whs.mil/Directives/forms/sd_forms/):

      (1) SD Form 821, Component Records Management Checklist for Processing the Departure of Presidential Appointees and Senior Officials

      (2) SD Form 822, Departing Employee Checklist Removal of Personal Files and Non-Record Materials from Government Custody

      (3) SD Form 833, Departing Employee Checklist Transfer of Records Between DoD/OSD Components

   b. The following DHA forms are available from [https://info.health.mil/cos/admin/DHA_Forms_Management/Lists/DHA%20Forms%20Management/AllItems.aspx](https://info.health.mil/cos/admin/DHA_Forms_Management/Lists/DHA%20Forms%20Management/AllItems.aspx):

      (1) DHA Form 143, Notice of Destruction, Health Affairs/DHA (Internal)

      (2) DHA Form 144, Notice of Destruction, Federal Records Center (External)

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RONALD J. PLACE  
LTG, MC, USA  
Director

Enclosures

1. References  
2. Responsibilities  
3. Defense Health Agency File Plan  
4. Appointment of Office Records Liaison Memorandum  

Glossary
ENCLOSURE 1

REFERENCES

(a) DoD Directive 5136.01, “Assistant Secretary of Defense for Health Affairs (ASD(HA)),” September 30, 2013, as amended
(c) DHA-Procedural Instruction 5025.01, “Publication System,” August 24, 2018
(d) United States Code, Title 44, Chapter 31, Records Management by Federal Agencies
(e) Code of Federal Regulations, Title 36, Chapter XII, Subchapter B
(f) DoD Instruction 5015.02, “DoD Records Management Program,” February 24, 2015, as amended
(j) Administrative Instruction 15, OSD Records and Information Management Program, May 3, 2013, Incorporating Change 1, April 19, 2017
(k) OSD Records Disposition Schedules (OSD/RDS), https://www.esd.whs.mil/RIM/
(n) DoD Instruction 6025.18, “Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule Compliance in DoD Health Care Programs,” March 13, 2019
(p) DoD Instruction 8580.02, “Security of Individually Identifiable Health Information in DoD Health Care Programs,” August 12, 2015
(s) Office of Management and Budget Memorandum M-19-21, “Transition to Electronic Records,” June 28, 2019
ENCLOSURE 2

RESPONSIBILITIES

1. DIRECTOR, DHA, OR DESIGNEE. The Director, DHA, or designee must provide general agency program oversight and ensure the DHA Records Management Officer and/or DHA Records Management Office has the necessary resources and Director-level support to accomplish the following:

   a. Establish and sufficiently resource a records and information management program within their organization to support the requirements outlined in References (a) through (h).

   b. Use standards, procedures, and techniques to ensure the most economical, efficient, and reliable means for creation, retrieval, maintenance, preservation, and disposition of their records, regardless of media.

   c. Institute measures to ensure records of continuing value are preserved and records no longer needed for current use (i.e., inactive records) receive appropriate disposition in accordance with Reference (k).

   d. Appoint an individual to be the CRMO to perform the records management functions, serve as the accountable records custodian in their organization, and liaison with Records Privacy and Declassification Division. The CRMOs must have knowledge of applicable laws and regulations governing records management. This appointment will be made in writing and furnished to the Office of Secretary of Defense (OSD) Records Administrator. All appointments will state the organizations supported by the CRMO. Appointment memos will be updated upon the departure or change of the individual(s).

   e. Ensure RLs are appointed within each reporting office to perform the records management functions within their organizations and liaison with the CRMO. These appointments will be made in writing and furnished to the CRMO. Appointment memos will be updated upon the departure or change of the individual(s).

   f. Ensure all DHA employees and contractors within their organization receive Annual OSD Records and Information Management Training via Joint Knowledge Online (JKO) and it is renewed when the certification date has expired to maintain compliance with Reference (f) and this DHA-AI.

   g. Ensure all offices within their organization have approved file plans that are accessible to employees and contractors.

   h. Evaluate current and potential Electronic Information Systems (EISs) and databases, ensuring the record information contained within the systems are retained as required by the OSD Records Disposition Schedule and systems are managed according to the policies in References (f) through (k), and procedures specified in this DHA-AI. Record information
created or received during the conduct of business and maintained in these systems not identified in the OSD Records Disposition Schedule must be brought to the attention of the Records Privacy and Declassification Division.

   i. Plan and budget for the migration of records and their associated metadata maintained in an EIS or database to new storage media or formats to avoid loss of record data due to media decay or technology obsolescence.

   j. Ensure essential documents and record information needed for continuity of operations are identified and preserved.

   k. Annually remind and caution all employees not to transfer or destroy records in their custody, to include e-mail, except as allowed under References (d) and (j).

   l. Report to the OSD Records Administrator any actual, impending, or threatened unlawful removal, alteration, or destruction of federal records.

   m. Ensure DoD employees and officials manage their personal papers in accordance with References (e) and (k) of this DHA-AI.

   n. Ensure records and information posted to commercial and government-owned social media sites are maintained in accordance with References (e) and (k).

   o. Direct contractors performing DHA program functions on behalf of the organization to create and maintain records to document these functions. In accordance with Reference (d) through (l), contracts must specify the delivery to the government of all the information required for the adequate documentation of the contractor-operated program and have the requirements identified with the Performance Work Statement / Statement of Work. The contractor will apply the appropriate file identification from the OSD Records Disposition Schedule at Reference (k).

   p. Direct in a contract vehicle support contractor personnel within their organizations to:

      (1) Maintain government records and information created and received in the course of their day-to-day responsibilities. Ensure each record set is completed, and enclosures or related papers are retained or accounted for in both paper and electronic filing systems in accordance with the OSD Records Disposition Schedule Reference (k).

      (2) Maintain electronic mail in accordance to Reference (s) and attachments documenting work related activities in accordance with Reference (j).

      (3) Ensure personal files, non-record material, and working files and information are maintained separately. Definitions of these terms can be found in the Glossary.

      (4) Follow the procedures in Reference (j) of this DHA-AI when removing personal files.
q. Ensure that records and information maintained on network shared drives (also known as shared drives), websites, or Defense portals are maintained in accordance with the References (d) and (k).

2. ASSISTANT DIRECTOR for HEALTHCARE ADMINISTRATION. The DHA (through the Assistant Director for Health Care Administration) will be responsible for establishing priorities for health care administration and management; policies, procedures, and direction for the provision of direct care at MTFs; priorities for budgeting; matters with respect to the provision of direct care at MTFs; direction for clinic management and operations at MTFs; and priorities for information technology at and between MTFs; ensure all the requirements of the DHA Records Management Program are in accordance with the guidance of References (f) through (i).

3. DHA DEPUTY ASSISTANT DIRECTOR (DAD), ADMINISTRATION AND MANAGEMENT. The DHA DAD, Administration and Management must ensure all the requirements of the DHA Records Management Program are in accordance with the guidance of References (f) through (i).

4. DHA, CHIEF INFORMATION OFFICER (CIO). The DHA CIO, must:

   a. Provide technical advice and assistance to the DHA DADs in order to support the inclusion of electronic records management functions into the design, development, enhancement, and implementation of EIS’ in accordance with Reference (e) and the OSD Records Disposition Schedule.

   b. As part of the capital planning and systems development lifecycle process, ensure:

      (1) Records management controls are planned and implemented in the systems in accordance with References (d) through (f).

      (2) All records in the system will be retrievable and usable for as long as needed to conduct DHA business in accordance with the OSD Records Disposition Schedule, whereupon they will be destroyed (i.e., temporary records), or transferred to National Archives and Records Administration (NARA) (i.e., permanent records), where the records will need to be retained beyond the planned life of an EIS. The DHA DADs and CIOs must plan and budget for the migration of records and their associated metadata to new storage media or formats to avoid loss due to media decay or technology obsolescence.

   c. Assist in the transfer of permanent electronic records to NARA in accordance with References (d) and (k).
d. Use a standard interchange format (e.g., American Standard Code for Information Interchange or Extensible Markup Language) when needed to permit the exchange of electronic documents between offices using different software or operating systems.

e. Provide guidance and assistance to DHA DADs with the implementation of the requirements in References (e) through (g), and (j).

5. CRMO, DHA. The CRMO, DHA must:

a. Complete OSD Records Administrator sponsored training and the six course NARA Records Management Certification Program within 3 months of appointment. See procedure in Reference (j) for more details on requirements.

b. Provide a copy of their CRMO appointment letter to the OSD Records Administrator within 30 business days of appointment and continue to do so annually thereafter.

c. Provide Record Management Training on a quarterly (or as needed), basis at Defense Health Headquarters, Falls Church VA. Additionally, the CRMO must ensure RLs complete the Annual OSD Records and Information Management Training online via JKO at: https://jkodirect.jten.mil/.

d. Evaluate DHA Offices and Components annually for compliance.

e. Ensure Purchase Care Contractors are evaluated bi-annually. All Purchase Care Contractor evaluations shall have a Records Management government employee that attends and provides direct oversight during these evaluations.

f. Ensure each office within the organization has an official file plan (Enclosure 3). Review and approve the file plan annually for each office to ensure that records are accurately identified. All DHA file plans must include:

   (1) Office Name/Location

   (2) RL

   (3) File Number

   (4) Title

   (5) Brief Description

   (6) Disposition

   (7) Media Type
(8) Vital Record

(9) Protected health information/personally identifiable information

(10) System of Record Notice

g. Create a unique Office Code that will be assigned to each division or office for tracking purposes, managing file plans, and locating RLs.

h. Develop a solution to manage electronic records created, sent, or received with the capability to identify, retrieve, and retain them for as long as they are needed. This includes all electronic messaging accounts and unstructured electronic records. The solution will take into consideration guidance from Reference (s).

i. Maintains a record on all current suspension actions to normal disposition instructions, such as litigation holds, record holds, freezes, moratoriums, or preservation orders. The DHA CRMO is responsible for the oversight and control of all Record Freeze actions. They must conduct record searches, implement preservation orders/production requests/freeze lifts, and ensure organization offices are aware of the responsibilities to safeguard records and information identified in existing preservation orders. Records Freezes must be coordinated with the OSD Records Administrator and NARA for their awareness and oversight. As part of the Records Freeze process, the CRMO works closely with the Office of General Counsel and Department of Justice to ensure responsive records are accessible.

j. Provide instruction to the organization with the application of disposition procedures, to include the destruction and retirement of official records. DHA Records Management Office verifies each disposition to determine if records are eligible for destruction. The DHA Records Management Office has established records destruction procedures and two specific DHA Forms that apply to Notices of Destruction:

(1) DHA Form 143, Notice of Destruction, Health Affairs/DHA (Internal)

(2) DHA Form 144, Notice of Destruction, Federal Records Centers (External)

k. Provide the OSD Records Administrator an active list of Capstone “Senior” Officials to ensure proper management of permanent email accounts. Notify OSD as Senior Officials transition in or out-process from DHA. The export and transfer of individual email accounts is maintained at the OSD level.

l. For additional guidance, the DHA CRMO can be contacted via email or phone at DHA.RecordsManagement@mail.mil or (303) 676-3450.
6. **DIVISION CHIEF/PROGRAM MANAGER.** The Division Chief/Program Manager must:
   
a. Serve as the government point of contact and appoint an office RL in writing.
   
b. Fill RL vacancies within 30 business days.

7. **RL, DHA.** The RL, DHA must:
   
a. Prepare and submit file plans annually no later than the end of January to the CRMO for approval. The DHA Records Management Office has a system that enables management of agency file plans as well as the following records functions:
      
(1) Create and/or edit the office file plan.

(2) Update file plan due to Preservation Orders/Freezes responsive records.

(3) Create new transfer request to an FRC.

(4) Recall records from FRCs.

b. Attend DHA Record Liaison Training within 3 months after their appointment and complete a refresher every 2 years and annually complete OSD’s Records and Information Management Training online via JKO at: [https://jkodirect.jten.mil/](https://jkodirect.jten.mil/).

c. Assign file numbers to official records and non-records from the OSD Records Disposition Schedule.

d. Ensure Official File Stations and official records and non-records in hard-copy format are labeled appropriately.

e. Maintain official records and non-records (active and inactive), in electronic format in the DHA Electronic File Station (EFS). DHA EFS can be setup on local networks where component offices cannot access the DHA network. The two DHA EFS environments are:
      
(1) Active: Records necessary to conduct the current business of an office.

(2) Inactive: Records that are no longer required in the conduct of current business and therefore can be maintained on a separate drive or destroyed, per approved disposition schedule.

f. Ensure all personnel creating and/or maintaining official DHA records and non-records do so in accordance with Reference (j).

g. Monitor records eligibility for destruction/deletion and submit Notices of Destruction for approval.
h. Notify the DHA Records Management Office of any permission changes needed for the EFS.

i. Box and inventory inactive paper records eligible for shipment to a FRC.

j. Disseminate Record Freeze information to all office personnel, and request everyone conducts record searches and provide an official response to the DHA Records Management Office.

k. Follow NARA regulations for record digitization activities.

l. Complete an EIS survey for electronic systems used by the office.

m. Participate in annual records management reviews and complete corrective actions if necessary.

n. Notify the DHA CRMO of the unauthorized destruction, damage, alienation, or removal of official records.

o. Notify the DHA CRMO when officials intend to remove non-record information for personal use. DHA RM must provide Records Management Out-Briefings and Secretary of Defense (SD) Forms to the departing employee, along with completion instructions. The DHA CRMO signs off on all applicable SD Forms prior to departure.

(1) SD Form 821, Component Records Management Checklist for Processing the Departure of Presidential Appointees and Senior Officials. This form is for Senior Officials only.

(2) SD Form 822, Departing Employee Checklist Removal of Personal Files and Non Record Materials from Government Custody. This form is completed by all personnel departing the agency.

(3) SD Form 833, Departing Employee Checklist Transfer of Records between DoD/OSD Components. This form is completed by all personnel transferring between DoD/OSD Components.

8. **DHA EMPLOYEES**. DHA employees must:

a. Maintain records and information created and received in the course of their day-to-day responsibilities.

b. Ensure each record set is complete and enclosures or related papers are retained or accounted for in both paper and electronic filing systems in accordance with the OSD Records Disposition Schedule available at Reference (k).
c. Maintain e-mail and attachments documenting work related activities in accordance with the OSD Records Disposition Schedule available at Reference (k).

d. Ensure records created, sent, or received using electronic messaging accounts are managed electronically, including the capability to identify, retrieve, and retain records for as long as they are needed, in accordance with part 1236.22 of Reference (e), and in accordance with References (a), (b), (g), (l), and (m).

e. Manage unstructured electronic records, other than electronic messages, in a records management solution that is compliant with References (g) or (m). This includes records created using any electronic applications.

f. Ensure personal files, non-record material, and work-related records and information are maintained separately.

f. Follow the procedures in Reference (j) for the removal of non-record material.

g. Complete the Annual OSD Records and Information Management Training via JKO.
ENCLOSURE 3
DEFENSE HEALTH AGENCY FILE PLAN

<table>
<thead>
<tr>
<th>Series #</th>
<th>Series Title</th>
<th>Type of Records</th>
<th>Media</th>
</tr>
</thead>
<tbody>
<tr>
<td>101-04</td>
<td>Office Organization Files</td>
<td>PHI</td>
<td>Paper</td>
</tr>
<tr>
<td>101-05</td>
<td>Office Record Locator Files</td>
<td>PHI</td>
<td>Paper</td>
</tr>
<tr>
<td>101-15</td>
<td>Office Service &amp; Supply Files</td>
<td>PHI</td>
<td>Paper</td>
</tr>
<tr>
<td>101-16</td>
<td>Office Property Record Files</td>
<td>PHI</td>
<td>Paper</td>
</tr>
</tbody>
</table>

Location
Paper: Official File Station 1, E-File Station: \a1\ssl11630\OfficialRecords\E-File Station(Records Management)\101-04 Office Records Locator Files

Freezes
No freezes

ENCLOSURE 4

APPOINTMENT OF OFFICE RECORDS LIAISON MEMORANDUM

MEMORANDUM FOR DHA RECORDS MANAGEMENT OFFICER

SUBJECT: Appointment of Office Records Liaison

1. In accordance with Administrative Instruction 15, the individual listed below will serve as the Records Liaison for [Office Name]

   Name: __________________________
   Telephone: ______________________
   Email: __________________________

2. The Records Liaison shall:
   - Prepare and continually update a Records Management (RM) Reference Guide so all office personnel are aware of RM processes and procedures within the office.
   - Prepare and submit file plans annually to the CRMO for approval.
   - Attend DHA Record Management Training annually and complete OSD’s Records Management Training online via Joint Knowledge Online (JKO):
     https://ikodirect.jten.mil/
   - Assign accurate file numbers to official records and non-records from the OSD Records Disposition Schedule.
   - Ensure Official File Stations and official records and non-records in hard-copy format are labeled appropriately.
   - Maintain official records and non-records (active and inactive) in electronic format in the DHA Electronic File Station (EFS).
   - Monitor records eligibility for destruction/deletion and submit Notices of Destruction for approval.
   - Notify the Records Management Office of any permission changes needed for the Electronic File Station.
   - Box and inventory inactive paper records eligible for shipment to a FRC.
   - Disseminate Record Freeze information to all office personnel, and request that everyone conducts record searches, and provide an official response to the DHA Records Management Office.
   - Follow NARA regulations for record digitization activities.
   - Complete an Electronic Information System (EIS) survey for electronic systems used by the office.
3. ___________________________ has completed the online training JKO training titled Annual OSD Records and Information Management Training (1 hr.) and DHA provided Records Liaison Training.

4. If there are questions concerning the above, please contact ___________________________ at ___________________________.

______________________________
Government Program/Project Manager Signature

______________________________
Title
GLOSSARY

PART I. ACRONYMS AND ABBREVIATIONS

CIO  Chief Information Officer
CRMO  Component Records Management Officer
DAD  Deputy Assistant Director
DHA  Defense Health Agency
DHA-AI  Defense Health Agency-Administrative Instruction
EFS  Electronic File Station
EIS  Electronic Information System
FRC  Federal Records Center
JKO  Joint Knowledge Online
MTF  Military Medical Treatment Facility
NARA  National Archives and Records Administration
OSD  Office of Secretary of Defense
RL  Records Liaison
SD  Secretary of Defense

PART II. DEFINITIONS

These terms and their definitions are for the purpose of this DHA-AI.

Capstone Senior Officials. All recorded information maintained in email accounts (regardless of classification) for current and incoming OSD personnel identified as Presidential Appointees, Presidentialy appointed, Senate-confirmed Officials, Schedule C, Detailed Officials, Non-career Senior Executive Service in the Immediate Office of the Secretary and Deputy Secretary of Defense, DoD Executive Secretary their staffs, and such other staff offices as the Secretary of Defense establishes within the Immediate Office of the Secretary of Defense to assist in carrying out assigned responsibilities.

Intermediate Management Organization. Existing organizations which assist with span of control in the management and administration of MTFs during the transition. They are tailored
by the Health care services delivered in the medical facilities consistent with the categorization in Section 703 of the National Defense Authorization Act for Fiscal Year 2017 (i.e., medical centers, hospitals, clinics).

**market.** A group of MTFs that operate as a system: sharing patients, providers, functions, and budgets, across facilities in order to improve the delivery and coordination of health services to drive value for beneficiaries.

**Military Medical Treatment Facilities.** Any DoD facility, outside of a deployed environment, constructed primarily for health care or as otherwise determined by the Secretary of Defense to be an MTF.

**non-record material.** U.S. Government-owned documentary materials that do not meet the conditions of records status or that are specifically excluded from the statutory definition of records (see record). An agency’s records management program also needs to include managing non-record materials. There are three specific categories of materials excluded from the statutory definition of records:

(a) Library and museum material (but only if such material is made or acquired and preserved solely for reference or exhibition purposes), including physical exhibits, artifacts, and other material objects lacking evidential value.

(b) Extra copies of documents (but only if the sole reason such copies are preserved is for convenience of reference).

(c) Stocks of publications and of processed documents. Catalogs, trade journals, and other publications that are received from other government agencies, commercial firms, or private institutions and that require no action and are not part of a case on which action is taken. (Stocks do not include serial or record sets of agency publications and processed documents, including annual reports, brochures, pamphlets, books, handbooks, posters and maps.)

**personal files (also referred to as personal papers).** Documentary materials belonging to an individual that are not used to conduct agency business. Personal files are excluded from the definition of federal records and are not owned by the government. Personal papers are required to be filed separately from official records of the office.

**working files.** Documents such as rough notes, calculations, or drafts assembled or created and used in the preparation or analysis of other documents. In electronic records, temporary files in auxiliary storage. May also include non-record material and technical reference files.