

CHEYENNE RIVER SIOUX TRIBE
Eagle Butte, South Dakota

RECORDS MANAGEMENT MANUAL

Central Records Department
(1983)

APPROVED
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C.R.S.T. COUNCIL
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INTRODUCTION-TRIBAL RECORDS MANAGEMENT

The Central Records Department is responsible for the application of efficient methods to the filing, storage, retention; and the **destruction** of Tribal Records when they have served their purpose, and are no longer needed. Basically, as our Tribal Government and total organization, as a whole has increased, in both size and complexity, the problems related to the preservation of Tribal Records has become more difficult and serious. We must recognize that the keeping of records is a necessary and on-going process of our Tribal Government. It requires a vast amount of records and documents to provide services to the members of our reservation. Our Tribal Government, administration and Tribal Programs continue to make and receive vast amounts of paper work on a daily basis. The Central Records Department controls the Tribe's records and papers. Our Tribal Government needs information and documents to carry out its functions-- Planning, organizing, directing, and providing services. Without the necessary Tribal records, these functions would not be possible. The storage, retrieval, and retention of vital Tribal Records enables our Tribal Government and Tribal Administration to provide and perform **services** to our people more efficiently.

RECORD KEEPING AUTHORITIES

In the Constitution and By-Laws of the Cheyenne River Sioux Tribe of South Dakota, Article I- Duties of Officers- Sec. 3 states: It shall be the duty of the Tribal Secretary to keep a true and accurate record of all matters affecting the Tribal records and account and to render a proper accounting of such records and statistics as are required by the Tribal Council. He/She shall be present at all Council meetings of the Council and shall keep an accurate record of all Council proceedings, including the Minutes of each special and regular meetings.

ARTICLE IV-MEETINGS AND PROCEDURES-SECTION 9

States that it shall be the duty of the Council to exercise care and caution to the end that a complete record is preserved of all **acts** of the Council and of all Committees appointed therefrom. Accurate copies of **all** such records shall be preserved in the files of the Council and accurate copies of all necessary records shall be transmitted to such Bureaus, departments, or elsewhere as may be required.

ARTICLE IV-SECTION 10

States that all records of the Council and its Committees or delegates shall at **all** times be a matter of public record, and any member of the Cheyenne River Sioux Tribe or his authorized representative, or any properly authorized officer or any employee of any Government departments shall **have** access to same, during office hours. However, it is provided that matters before the Council while in Executive Session shall be, at the option of the Council, withheld from the public, or from **individuals** or their representatives, until after same, shall **have been acted upon** or otherwise quietly disposed of.

ARTICLE IV-SECTION II

States; Copies of all leases, contracts, deeds, or assignments and all other papers or documents pertaining to lands of any nature on the reservation, shall be carefully preserved by the Council, and in so far as it's possible, all other documents affecting the rights and equities of the Tribe as a whole, or the individual members thereof, shall be kept and preserved in order that such information shall at all times be available to the Council and to the individual members of the Tribe; and duplications of all such documents shall be deposited in the files of one agency (Central Records Department). We are required by the Code of Federal Regulations to maintain records on Federal Grants and Contracts. It is also clearly apparent that our Tribal Constitution requires the Tribal Council and the Tribal Secretary to maintain records.

NARRATIVE/OBJECTIVES

The Central Records Department's primary purpose is to provide the mechanism by which the Tribal Secretary may fulfill the basic legal requirements on record retention established by the Tribal Constitution, Tribal Government and also by Federal laws and regulations. The Department's main function is the storage and retrieval of all Tribal Records. Storage involves the set-up of a filing system that can provide the quick retrieval of a document when it is needed by the Administration, Council, Programs, or individuals. Although many records pertaining to individual Tribal programs and operations will be retained initially by the Central Records Department, most program documents shall be received and kept by the individual departments and programs. When these documents are no longer actively used in daily program administration, each program director shall review their files and transfer these records to the Central Records Department for storage and disposition. The Disposition of Tribal Records may include filing, inactive storage, Microfilming, retention or the destruction of such records that are no longer needed.

The primary functions and objectives of the Central Records Department are:

1. Reproduce General Administrative Material.
2. File current and historical data.
3. Retrieve, research and reproduce documents requested by Tribal officials and other concerned individuals.
4. Destroy out-dated material.
5. Microfilm records which are to remain as permanent records.

It shall be the duty of the Central Records Department to keep abreast of all progressive record management requirements; to provide research requested by Tribal officials and to safe-guard any historical documents and records of the Cheyenne River Sioux Tribe. Because the Administration and the Tribal Council will be the primary users of the Central Records Department, the Department should remain in the Central Administrative Building. The Department also becomes the central

location for retaining laws and regulations imposed upon the Tribal employees and members by the Federal Government and the Tribal Council. Security of confidential information is also provided by the Department. The centralization of the accounting, personnel management, property and record keeping systems fulfills the legal requirements of the Federal Government in regards to Contract and Grant regulations. The Central Records Department has become a permanent and vital department of our Tribal Government and should remain as such.

RECORDS-TRIBAL PROPERTY

Any record or document generated, created, or received by a Tribal Officer, employee, or program shall immediately become the property of the Cheyenne River Sioux Tribe of the State of South Dakota. Utmost care shall be given for the preservation of these records. The authority to dispose of Tribal Records shall be vested in a Records Destruction Board and shall be completed under the supervision of an employee of the Central Records Department. Failure to preserve and care for Tribal Records could result in loss of employment and/or criminal charges.

DEFINITION-TRIBAL RECORDS

Records: All documentary materials created or received by any Tribal official or employee in the transaction of business in the name of or for the Cheyenne River Sioux Tribe. These records shall be preserved as evidence of the Tribe's functions, policies, decisions, procedures, operations, and services. A record can be made of any material such as a paper, sound tape (cassette), magnetic tape, computer tape, or read-out picture, map, microfilm. All of these or anything else that contains information regarding Tribal business transactions will be considered as a Tribal record; also copies of such, and will be recognized as legal documents in a Court of Law.

ARTICLES OF TRIBAL RECORDS DISPOSITION

Article I- Establishment of Records Management Department:

Under the foregoing authority granted by the Tribal Constitution. The Tribal Secretary hereby officially establishes within the organizational structure of his/her department, a records management program herein, to be known as the "Central Records Department of the Cheyenne River Sioux Tribe", which will apply efficient and economical management methods to the creation, utilization, maintenance, retention, preservation, and disposal of Tribal records.

Article II- All public records are property of the Tribe:

All records made or received by, or under the authority of, or coming into the custody, control, or possession of Public officials of the Cheyenne River Sioux Tribe, in the course of their public duties are the property of the Cheyenne River Sioux Tribe and shall not be mutilated, destroyed, transferred, removed, or otherwise damaged or disposed of in whole or in part, except as provided by law under the Cheyenne River Code of Law.

Article III- Tribal Official/Employee Tampering with Public Records:
Felony- Forfeiture of Position

Any Tribal Official/Employee or subordinate, thereof having the custody or access to any record, map, book, paper, document, including those of the Tribal Judicial System, deposited, filed, recorded, or registered in any Public Office, or appertaining thereto, who is guilty of stealing, willfully destroying, mutilating, defacing, erasing, altering, falsifying, or fraudulently removing or secreting any of the same or substantial parts thereof, or who permits any other person to do so, is guilty of a Tribal felony, and in addition thereof forfeits his office and position.

Article IV- Records Transfer

The Director of each tribal program/department shall on an annual basis, complete an inventory of Tribal office files, records, documents, and submit these records not in active use to the Central Records Department for disposition.

Article V- Microfilm Copies

All productions and copies of microfilm made by the CRST Central Records Department shall be considered as legal documents of the Tribe and can be submitted as evidence before any Court of Law, including the CRST Judicial System.

Article VI- Disposal of Records

Section A- Creation of Board to supervise destruction of records-
Permission required for destruction

There is, hereby, created a Board consisting of the Vice-Chairman, Administrative Officer, Tribal Secretary, Controller, Personnel Director, and one Council person to supervise and authorize the destruction of Tribal records. No record or document shall be destroyed or otherwise disposed of by any Department or employee of the Tribe unless it is determined by a majority vote of this Board, that the record has no further administrative legal, fiscal, research, or historical value. The Board shall elect a Chairman and Secretary to conduct business according to established procedures.

Section B- Destruction of Records:

No records will be destroyed without the majority vote of the Records Disposition Board. The destruction of records will be supervised by a designated Tribal official in a confidential manner, and must be present until the destruction is complete. Obsolete records will be buried in the Sanitary Landfill of the Tribe. Upon the request of Tribal Directors and officials, records of a confidential or classified nature will be shredded, prior to disposal.

Article VII- Amendment

These Articles may be amended by a majority vote of the Cheyenne River Sioux Tribal Records Disposition Board.

Article VIII

Upon passing the Tribal Council by resolution, these Articles shall become a part of the Cheyenne River Tribal Legal Code of Law, and also become a part of the Cheyenne River Tribal Personnel Policies and Procedures Manual, to be carried out by the Tribal Administration.

STATUS OF RECORDS

Regardless of type, all records pass through three basic phases:

Active= When reference is frequent and immediate access is important. Normally, this is a period of 1 to 2 years and the records should remain in the office that receives or creates these records.

Inactive= Retained usually for 3 to 5 years for occasional reference and for legal reasons. They should be removed to a low cost storage site, but will remain under the control of both the originating office and the Central Records Department.

Obsolete= These records will no longer be required for the current operations of the program and/or Tribal government. These records will be shredded and buried at the Sanitary Landfill site or burned under supervision.

RECORDS DISPOSITION

Successful records management programs generally have started with an attempt to destroy obsolete records and transfer inactive records from offices to low cost storage. Savings in space, personnel, supplies, and equipment can be realized relatively quickly from a records disposition program. Disposition of Tribal records may indicate or include filing in the Central Records Office, microfilming, destruction or transfer to an inactive storage area.

MICROFILMING

In 1939, an Englishman, John Benjamin Danzer, made the first microphotograph of a document. The first practical application of microfilm was in the Franco-Prussian War, 1870-1871, when Paris was under seige, and the surest way out of the French Capital was by air. Microfilmed documents, placed in canisters, tied to legs of carrier pigeons were used to communicate with the outside world. Presently, the Federal Government, and many states have adopted microfilming as a means for efficient management and storage of their records. Within South Dakota, microfilming was approved by the 1963 Legislature.

The Central Records Department was established the same time that the Offices of Accounting, Property Management, and Personnel were centralized. The Central Records Department was originally established under a Federal (638) Grant. The Tribe sub-contracted with various consultants, but mainly with the Company of Comgraphix, Inc., Southwest Microfilm Division of Albuquerque, New Mexico to provide actual **on-site** consultation and work in sorting **data**, setting up a filing system and a microfilm program. The Comgraphix Company, Inc. also provides for the safe deposit of **all** original Tribal microfilms. Currently Comgraphix, Inc. will continue to process, develop, and store our Tribal microfilming. Priorities for microfilming will be developed each fiscal year.

ADVANTAGES OF MICROFILM

Space Savings= Records on microfilm need as little as 2% of the space occupied by the same records on paper. Microfilming to save the cost of space and equipment, must be weighed against the cost of microfilming. Normally, it is more economical to microfilm inactive records that must be retained for more than 8 to 10 years.

Security= Microfilm to insure safety of vital records may frequently be found to be inexpensive insurance against loss. The paper, records, or duplicate film, then may be retained at the point of origin and the master microfilmed stored at a security location.

Preservation= When records of permanent value are found to be deteriorating or becoming brittle due to age, microfilm may prove to be the most economical method of copying and preserving the information.

Low-Cost Distribution= Economical film duplicates are quickly produced and inexpensively mailed.

FILM AND FILM FORMATS

The films used to microfilm documents have the same basic chemistry and appearance as silver base films used in Candid Cameras. Camera microfilm is supplied in 16-, 35-, and 105 mm widths, and supplied on 100 and 200 foot reels. The normal film diameter is 5- mils, however, 2% mil films are now available. Of these, the 16-mm and 35-mm widths are most popular. 16mm film is widely used for recording original documents **up** to 14 in. in width, and 35-mm film is used for larger **sizes** such as drawings, maps, and newspapers. The Central Records Department uses 16-mm film. Microform is the general name for the various types and formats of microfilm. Currently the Central Records Department uses film jackets- Microfilm strips that are inserted inside transparent **jackets**. Each jacket can hold close to a hundred documents.

Film Base

The plastic support for the emulsion and backing layers must be either

cellulose ester or polyester based materials and capable of meeting standards for "Archival-Permanence¹* as determined by Federal Standard No. 125 a. Certain film manufacturers indicate compliance with the standard by stamping a small triangle along the edge of the film.

Density

Measurement of the degree of opacity or darkness of the exposed image on the film results from the amount of "exposure" to the light. Density is one of the most difficult and essential factors to control in microfilm production. It is subject to variations under the following conditions:

- Colors of the document
- Changes in line voltage
- Aging lamps
- Dirty mirrors
- Temperature variations in processing
- Age of processing chemicals
- Variation in film emulsion
- Changes in ambient office light conditions
- Reflection capability of clothing- avoid white

Density must remain within a range of .90 thru 1.2 however, the Bureau of Standards recommends that the least density be used that will produce satisfactory viewing and reprint results.

Resolution

The ability of a photographic material to reproduce fine detail distinctly. Sometimes referred to as "sharpness" of the microfilming image. This is expressed in terms of the number of lines per millimeter discernible in an image. Resolution is limited by the following:

- Quality of the camera lens
- Focus
- Degree of density
- Vibration
- Photographic material

The following measurements of "resolution" are the minimum acceptable standards for Tribal permanent records microfilmed at 24x reduction. Use of quality film and proper camera adjustments, may increase all measurements by at least 10 points.

<u>Lines per mm</u>	<u>Application</u>
79 or less.....	Unsatisfactory
80.....	Non-permanent Records
95.....	Rotary Cameras
100.....	Planetary Cameras
120.....	Engineering drawings and like

.....records with fine exacting details.

Residual

The amount of developing solution that remains on the surfaces of the microfilm after the final wash must not exceed .005 milligrams per square inch of film. Any amount in excess of .005 will stain and fade the image.

FILMING OPERATIONS

"Reduction Ratio" is the term used to express the number of times the original document has been linearly reduced while being microfilmed (24:1 48:1, etc.). Just how great this reduction may be, depends largely upon the size, detail, and contrasts of the original documents along with the size enlargement lens in the retrieval equipment. The greater the reduction ratio, the greater the number of images that can be microfilmed on a given length of film.

Adequate documentation and identification of microfilmed records must be provided in order to preserve the integrity of the records and to insure acceptance in any legal procedure. Documents microfilmed on roll film must be preceded and end with a certificate as to their authenticity. A camera operator's certificate listing name, date, etc., should also be attached to and microfilmed with the rolls of film/document.

In the camera operation, it will be necessary to include the indexing controls or locating devices required for retrieval. The simplest of locating devices on roll film, is the "flash target."

This is simply a sheet of 8½ x 11" paper marked with heavy lines that would be easily identified as film passed by on a reader screen. Its main purpose is to identify breaks between different groups of records on the same roll.

During the course of microfilming, errors will occur that require re-microfilming of a document, or a series of documents. Following are the corrective measures to be taken when the filming is in the roll format:

- (1) Advance the film one or two frames, then microfilm the "start of retake" target.
- (2) Immediately following the retake target, remicrofilm the affected document (s) followed by the "end of retake" target.
- (3) Again advance the film one or two frames and continue on with the normal microfilming program.

All processed film should be immediately inspected to insure that it not only complies with the set microfilming standards, but that it is also an adequate substitute for the original microfilmed paper document. There will be cases where the quality of the original document will be so poor as to preclude a quality microfilm product. In such

cases, it may be necessary to re-draft or re-create the original document if it is determined that it should be committed to a microfilm format.

Roll film should be stored inside either metal or plastic containers. Avoid storing directly into cardboard containers as the elements of the cardboard can create a chemical reaction with the film.

Write on the outside film container all the indexing information contained on the certificate of authenticity and the flash targets micro-filmed. Take particular care in marking the roll number as it is the key to finding information in almost any retrieval system using roll film.

MICROFILM STORAGE

There are number of hazards to the satisfactory storage of microfilm that applies to records intended for either temporary or archival storage. Extremes of temperature, humidity, and air impurities (dust) all affect durability. The following standards are established for the storage maintenance of microfilmed records:

	<u>Temporary</u>	<u>Archival</u>
Temperature	50 - 80 F	50 - 70F
Humidity	25 - 60 %	30 - 50%
Air Conditioning		Essential

If storage conditions are kept within the limits above, an inspection of all film should be made at two-year intervals. Perhaps it is not always possible to inspect at the recommended frequency. Rather than omit inspection entirely, some film should be selected at random each month for examination. This will provide some "insurance" at a relatively small cost. If there is indication that film records are not keeping properly, storage conditions should be improved and other protective measures given the film. Also copies should be made of films that show signs of deterioration.

COMMERCIAL CONTRACTS-MICROFILMING

Contracts can be negotiated with companies to film larger documents; such as computer print-outs, maps, etc. Services agencies, such as Comgraphix, Inc. of Albuquerque, New Mexico will develop, process and serve as an alternative site to store original microfilm copies.

FILES AND FILING-GENERAL

Filing is the process of classifying, arranging, and storing records so that they may be located quickly when needed. One must think of filing as not only a means of storage of records., but also as systematic way of organizing records in a manner to permit their prompt location.

A Tribal Organization will have the largest share of its working ca-

pital focused on its operation, frequently leaving little to spend on an effective filing system. By neglecting this potential **cost-cutter**, agencies risk long-run inefficiencies due to many hidden costs in filing. Hidden costs that will, in time, drain dollars and efficiency.

Those responsible for administration should recognize that, in buying for today, they are investing in the future. All too often, as an organization grows or changes, its filing tools become obsolete and an expanded system is needed. A manager must ask himself many questions about his filing system to recognize the benefits of having the best filing system:

Is the document even necessary? Will the number grow over the years? You must think of future growth and buy a system that will expand easily.

Does it matter if access to documents is fast or slow? Knowing this will let you select the system that saves the most time for people using it.

The more people retrieving documents, the more organization is needed. The filing system should be ready to accommodate increasing staff. Congestion of paper and people are reduced when documents are categorized and concentrated as near as possible to fingertip retrieval. As little wasted space as possible must be the target because of the high cost of today's floor space. When space is saved, so is money, and higher productivity is achieved.

When larger volumes of documents are involved, one of the most effective filing procedures is the combined use of microfilm and the computer. The general procedure would be to microfilm the original documents, along with daily microfilming of any updating actions, and encode into the computer an index as to where the microfilmed documents can be located (**roll#, frame#, etc.**), such a system will allow one file clerk access to thousands of documents in a matter of seconds and allow for a large savings in filing space.

STATUS OF FILES

A file is considered active, inactive, or dead depending upon its rate of use. If the contents of a file drawer are referred to at least two or more times per month, it should be considered "active." An "inactive" file is one that is used so infrequently in current operations, that its low usage rate does not justify continued maintenance in the active office area. An inactive file is sometimes confused with a dead file. A dead file is one that is seldom referred to, but is maintained for a long term administrative or for legal reasons. If possible, this type of file should be microfilmed at some point in its status.

NEEDLESS FILING

A review of the individual papers in the records turned into the Cen

tral Records Department, makes one wonder why so many were filed in the first place, it is evident that there is too much routinely dropping all incoming papers into the "file" box, instead of swinging a little further around, and dropping some of the papers into "file 13." Filing unneeded papers, in addition to wasting manpower, wastes equipment. Following are a few examples of ways to cut-down on needless filing:

Retain periodicals, circulars, meeting notices, newsletters, newspaper information requests, etc., in a separate reference file and site. These materials come in so frequently, they quickly fill up the files and present an obstacle to finding needed documents. File only those items which are sure to be referred to.

Avoid "extra copy" files. They are costly, and they can be misleading for they seldom contain all the background data necessary to provide a usable record. Furthermore, extra copy files tend to undermine the main files.

CENTRALIZATION OF FILES

The Central Records Department fulfills the requirements of Federal Grant and Contracting Regulations, regarding the centralized functions of Accounting, Personnel, Property and Record Keeping. Also, the centralization of files provides quick access to all users, primarily the Tribal Administration and Government. Protection and control of confidential Tribal records is also provided. The centralization of records in one location, also provides access to many different Tribal programs, departments, and individuals, because many people have the need for obtaining the same records. Centralization saves time, money, staff, and space.

CONFIDENTIALITY

A fairly complicated filing system is used by the Central Records Department. Access is limited because without the basic comprehension, it would be extremely difficult to locate a single document amongst millions of documents, so the large-volume filing system provides the first safe-guard, regarding the maintenance of confidential records.

Secondly, the Staff are trained and given orientation on the Federal laws that apply to Records Keeping, such as the Privacy Act, and the Freedom of Information Act. Also, tampering with Tribal records could result in the loss of employment or prosecution in the Tribal Judicial System.

FILE RETENTION

Basically, all files that set a policy, regulation, law, resolution of any Government organization, especially Tribal should be retained. Especially important, is the retention of contracts, grants, financial records, budgets, audits, property transaction, and any transactions that affect the Cheyenne River Sioux Tribe as a whole or individual members.

ADMINISTRATIVE MEMORANDUMS

Administrative procedures for establishing retention schedules will be set by the Tribal Administration. Memorandums which give Administrative directives that set or change Tribal policies should be filed permanently. Administrative Directives and Memo's that do not affect or establish Tribal policies should be destroyed. The member of the Administration that sends a memorandum shall indicate on all memorandums, a retention or destroy date. If no date is indicated, a 90-day period of retention is recommended. Some memorandums may indicate or define certain memo's as being permanent Tribal records. This policy will greatly reduce unnecessary filing and save vital storage space.

INDEXING

Indexing is the mental process by which is determined the name, subject, or other caption under which a piece of correspondence is to be filed. There are at least five different clues for determining the caption under which the correspondence is to be filed:

- (1) Name contained in the letterhead.
- (2) Name of the person or company to whom the letter is addressed.
- (3) Name in the signature.
- (4) Name or subject discussed in the correspondence.
- (5) Name of geographic location about which the correspondence is concerned.

In selecting an index caption, the indexer must determine the probable heading under which the correspondence will be requested from the files. If a paper may be requested in several different ways, it should be filed under the most frequently used caption and cross-referenced under the others.

CROSS-REFERENCING

Cross-referencing is the process by which cards or sheets of paper containing information about the actual location of a document are placed in all the places in a file where a person might look for that document itself, and tell under what file caption it has been filed. Records personnel must determine when to cross-reference and when to avoid it. It is essential for finding some materials, whereas, too many cross-references, which are not pertinent, are hinderances to easy filing.

FILING SYSTEMS

There are many methods of filing, but the Central Records Department suggests that each office use a simplified subject file in an alphabetical arrangement. If the file is large, a subject-index card catalog should be implemented to facilitate retrieval. In addition, the Central Records Department would like the programs and offices to use the following file titles for Tribal correspondence:

Incoming Chrono	
Incoming Subject	
Outgoing Chrono	
Outgoing Subject	
Interoffice Receiving Chrono	-----Pertains to office occupying
Interoffice Receiving Subject	the same building, such as the
Interoffice Sending Chrono	Administrative Building, exclu-
Interoffice Sending Subject	ding the BIA Office Section.

CHRONOLOGICAL FILES

A chronological arrangement is used usually in conjunction with some other system. The files are arranged by dates, according to year, month, or day. They are used for follow-up work, appointments, and as a reminder of dates. A tickler file is closely related to the Chronological file, and is established on the same basic principles. Chronological filing, within a folder, is often used in case files.

SUBJECT FILING

In arranging of records by a given subject title, the Central Records Department uses a combination filing method of a Subject-Numeric System, whereby consecutive codes and numbers are assigned to each subject category used. A subject index card is used, and or which, also gives the number code. The numeral code is attached to our vertical shelf files which facilitates quick retrieval.

USE OF FILE FOLDERS

Folders are used to keep related papers together. They may be related because they are concerned with the same subject or with the same person, place, or thing. Folders usually have a capacity of between 3/4" and 1" as indicated by the scoring close to the fold.

The folder should not be overloaded beyond this capacity. If there is more than the permissible amount of material, an additional folder should be established and the contents divided on a chronological, alphabetical, or other logical basis and appropriate notation made on the folder label. Because we use shelve folder cabinets, it is advisable to use side tab folders.

USE OF FOLDER LABELS

Folder labels may be gummed or pressure-sensitive. They are intended to identify the file folder and to speed filing and finding the material. They are not intended to summarize the detailed contents of the folder.

TRAINING

The Central Records Director has a direct responsibility to keep up with all new Records Management techniques and advancements regarding both the keeping of records, and microfilming formats. In turn, it

is also the responsibility of the Director to provide adequate and on-going training to the sub-ordinate Staff.

People are a basic resource. It is people who determine the purpose of files, then collect information and organize it. It is people who maintain files and use them. Files management is dependent on knowledgeable people who apply what they know. A good employee can keep a poor system functioning with some degree of efficiency. An inept employee cannot maintain the best planned system. Records management personnel should be selected and trained carefully, not assigned to the job simply because they lack typing and shorthand. They should be intelligent, capable of understanding what the various programs of our Tribe do and why. A knowledge of State and Federal Government Programs and Policies is also advisable. Good comprehension, reading and writing abilities is essential to any filing system, but especially to the subject-numerical filing system that the Central Records Department uses.

GLOSSARY OF TERMS

- Active Records---Records that are referred to more than one per file drawer per month.
- Alphabetical Filing---Filing papers alphabetically such as by subject, by topic, by personal name, by place name, or by organizational name.
- Batch Filing----An adaptation of alphabetical filing in which the alphabet is divided into a large number of segments or batches and all the material relating to a particular segment is filed within that group.
- Case File-----A file containing all papers pertaining to a specific subject, person, place, or thing. Example; a personnel case file containing personnel records relating to one individual.
- Centralized Files---The files of several organization units physically grouped in one location.
- Charge-out Card---A card inserted in the file in place of loaned material which identifies and indicates the location of the materials. Also, this is called a file-out card.
- Chronological Pattern---A file in which papers are arranged in progression date sequence.
- Classification---A means of organizing and arranging papers and documents in accordance with a prescribed system which relates them to each other and to the organization that created them.
- Coding-----The act of writing file designations on records in the process of classification.

- Convenience File--- Unofficial desk files or other unofficial files physically located near the point of usage for convenient reference.
- Cross-Reference--- A form or extra copy used to find a basic record when reference is made to a name, number, or subject other than the one which the record is filed.
- Current Records--- Records needed for the day-to-day business of activity.
- Cut-Off----- A designated time beyond which materials is not added to file series. This breaking off or discontinuing of a file series facilitates the transfer and disposal of records.
- Numerical Filing--- Filing papers in a numerical sequence.
- Out Card----- A record made as a substitute for papers or a folder removed from the file, showing the date removed, by whom removed, and for what purposes.
- Records----- All documentary materials created or received by an office, officer, program, or department in the transaction of business and preserved or appropriate for preservation as evidence of the Tribe's organization, functions, policies, decisions, procedures, or operations of the Tribe or for their informational consent.
- Records Disposal--- Removal of program/department records to be destroyed, transferred to the Central Records Department for filing and/or microfilming; or transfer to an inactive records storage site.
- Screening/Purging--- Removal of program/department records, of individual papers and folders, usually to permit disposal of parts of the file, and retention of the remaining. (Also known as "weeding out the files.")
- Sorting----- Dividing documents, papers, or files into appropriate alphabetical, numerical, subject, or other groups as one of a series of steps necessary to place them in the proper relationship with other documents, papers, or files.
- Series----- A body of records filed together because of some connection arising out of their creation or use.
- Subject Filing--- The arranging and filing of papers by their intrinsic content rather than by name of address, date, or other characteristics.
- Tab Cut----- The width of the folder or guide tab in proportion to

the width of the folder or guide. For example, 1/3 cut means a tab is 1/3 the width of the folder or guide.

- Tab Position---Location of the tab, reading from left to right of the folder or guide. Thus, "First position" is at the left "Second position" is at the center, and "Third position" is at the right of folders in which the tab is 1/3 the width of the folder.
- Terminal Digit Filing---The arrangement of records in numerical order by final digits, or groups of digits (usually two digits per group), reading from right to left.
- Vertical Filing---The filing of records in an upright (on edge) position rather than a face-up position.
- Visible Filing---The arrangement of a group of forms or cards so that data placed on their margins serve as an index which can be seen without thumbing through the file.
- Decentralized Files---Records located and maintained in or near the offices immediately responsible for the functions in connection with which they were accumulated.
- Disposal Schedule---A plan for preservation and the orderly disposal of records. It contains an itemized list of records specifying disposal actions to be taken at stated intervals.
- Documentation---Papers containing information about a subject, a function, a policy, or a person, place, or thing.
- File------(1) A body of papers that has been accumulated in connection with a single transaction, subject, or matter of business, or (2) A larger aggregation of such papers representing the business of an activity of office.
- Filing System---A system for identifying and organizing records so that they can be located quickly when needed. There are two filing arrangements, alphabetic, and numeric on which all filing systems are based.
- Follow-up File---A date file by which pending papers, obligations, appointments, commitments, etc., are automatically brought to attention for action on the appropriate date.
- General Correspondence File---A file containing of records on a number of subjects, as distinguished from a case file containing records about a specific transaction or project.
- Geographical Filing---Filing papers by geographic location of the in-

dividual, organization, or project concerned. Locations (such as cities, counties, or states) are arranged in alphabetical order; within the geographic location, the name or number by which the individual or organization is identified may be arranged in alphabetical or numerical order.

Guide-----A heavy-weight card with a caption tab used to subdivide and support the contents of a file drawer. It is an aid to filing and finding papers.

Inactive Records---Records that are referred to less than one per drawer per month.

Label-----The gummed tag attached to or the marking upon the tab or a folder to identify the contents of the folder.

Misfile-----A record which is filed under an incorrect file designation or in an improper sequence.

Non-current Records---Records dealing with completed or adjourned business not needed for action or reference in day to day transactions.

Non-record Material---Material not included within the definition of the word "**records**", and specifically, material which serves no documentary or record purpose and which need not be filed or which can be destroyed after a brief suspense period; extra copies of documents preserved only for individual convenience of reference drafts, worksheets, and notes which do not represent significant steps in the preparation of record copies of documents.

MICROGRAPHICS

Currently, the Tribe is subcontracting with Comgraphix, Incorporated, Southwest Division, Albuquerque, New Mexico, regarding our Microfilming Program. The Tribe's microfilm equipment consists of two (2) microfilm cameras, and a Reader/Printer to make enlarged copies. Comgraphix, Inc. processes, makes duplicates and stores the original microfilms for the Tribe.

Tribal Archives

The Central Records Department will accept voluntary donations of historical records, papers, pictures, etc., specifically regarding the preservation of our Tribal heritage, history, and culture.

CHEYENNE RIVER SIOUX TRIBE

JOB DESCRIPTION

- JOB TITLE: Director of Central Records
- SUPERVISOR: Tribal Secretary
- AUTHORITIES: Responsible for all Activities of the Central Records Department
- QUALIFICATIONS:
1. High School Graduate
 2. Ability to Supervise
 3. Typing Ability
 4. Filing Ability
- DUTIES:
1. Supervise all Employees of the Department
 2. Evaluate Employees Performance Periodically
 3. Train Employees
 4. Maintain Retention Requirements for the Various Types of Documents
 5. Analyze Documents and Determine the Proper Filing and Security Codes
 6. Perform the Duties of the Other Employees when Necessary
 7. Hire Employees
 8. Approve Time Reports
 9. Requisition Supplies, Etc.
 10. Safeguard Tribal Assets in Care and Custody of Department

CHEYENNE RIVER SIOUX TRIBE

JOB DESCRIPTION

JOB TITLE: Microfilm Clerk

SUPERVISOR: Director of Central Records

AUTHORITIES: None, Staff Position

QUALIFICATIONS:

1. High School Graduate or Equivalent
2. Typing Ability
3. Filing Ability
4. Aptitude for Operating Microfilming and Other Office Equipment

DUTIES :

1. Microfilm Documents and Prepare Microfiche
2. Assist in Filing and Retrieving Documents
3. Typing of Index Cards or Other Documents
4. Photocopying Documents

CHEYENNE RIVER SIOUX TRIBE

JOB DESCRIPTION

JOB TITLE: Research **Clerk/File** Clerk

SUPERVISOR: Director of Central Records

AUTHORITIES: None

QUALIFICATIONS:

1. High School Graduate
2. Typing Ability (30-40 wpm)
3. Filing Ability
4. Ability to Analyze Documents to Determine the Subject Matter for Filing Purposes.
5. Ability to **Use/Set** up Filing System.
6. Good Reading and Comprehension Abilities.
7. Good Knowledge of Office Machines and Procedures.
8. Good Knowledge of Tribal Administration and Government.
9. Ability to Keep Confidential Information.

DUTIES:

1. Analyze Documents and Determine the Proper Filing System.
2. Prepare Index Cards.
3. File Documents.
4. Copy Documents.
5. Research, Retrieve, Check-out, and Follow-up on all Tribal Documents and Records.
6. Additional Duties may be Assigned by the Director.

CHEYENNE RIVER SIOUX TRIBE

JOB DESCRIPTION

JOB TITLE: File Clerk

SUPERVISOR: Director of Central Records

AUTHORITIES: Supervision of Daily Tasks of the Assistant
File Clerk

QUALIFICATIONS:

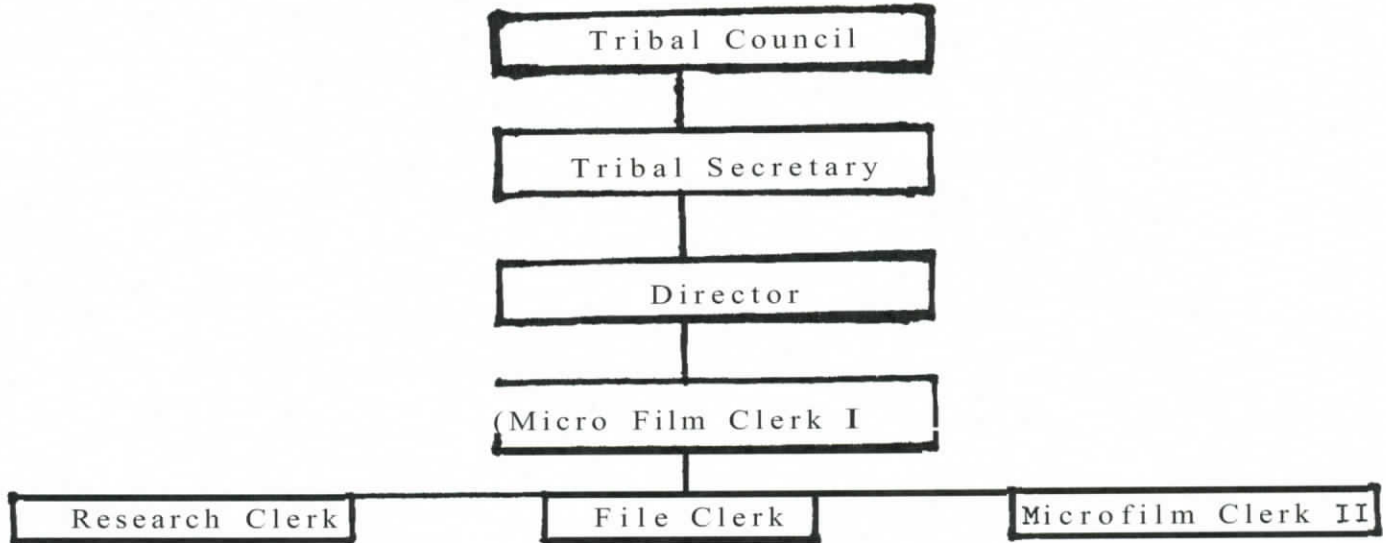
1. High School Graduate
2. Typing Ability
3. Filing Ability
4. Ability to Analyze Documents to Determine
the Subject Matter for Filing Purposes

DUTIES :

1. Analyze Documents and Determine the Proper
Filing Code
2. Prepare Index Cards
3. File Documents
4. Retrieve Documents
5. Copy Documents
6. Direct the Activities of the Assistant
File Clerk

CENTRAL RECORDS DEPT.

ORGANIZATIONAL CHART



	<u>Classification</u>	<u>Annual Salary</u>
Records Director	6/2	11,918.40
Microfilm Clerk I	3/4	9,797.07
Microfilm Clerk II	3/3	9,339.00
File Clerk/Research Clerk	3/3	9,339.00
File Clerk	2/2	8,070.40

CHEYENNE RIVER SIOUX TRIBE

CENTRAL RECORDS

SECURITY CODE

Due to the enactment of the Privacy Act by the Federal Government, it becomes necessary for a security code system to be built into the Central Records Department. To prevent an injustice to an individual and for protection of the Tribe, a code is established with two classifications. They are as follows:

Clearance I: General Public Information. This clearance obtains all information authorized under the Freedom of Information Act.







Clearance II: Restricted to individual employees, individual welfare recipients, immediate supervisor, Tribal elected officials and authorized agents of the **Federal** Government.

CHEYENNE RIVER SIOUX TRIBE

CENTRAL RECORDS

COLOR CODE - DESTROY DATE

For ease in locating documents which are outdated and due for destruction, a color coding system is used. Small color strips or marking with colored ink on the upper edge of the index cards. The color indicates the last digit of the year in which the document is to be destroyed as follows:

White	: 	Permanent retention
Red	: 	1 and 6, i.e. 1981, 1986, 1991, etc.
Blue	: 	2 and 7, i.e. 1982, 1987, 1992, etc.
Green	: 	3 and 8, i.e. 1983, 1988, 1993, etc.
Black	: 	4 and 9, i.e. 1984, 1989, 1994, etc.
Orange	: 	5 and 0, i.e. 1985, 1990, 1995, etc.

One color is used to represent two or more dates, i.e. 1981 and 1986 use red, to reduce the number of colors needed. Annually all cards with the color for that year are pulled. For example, at the end of 1981, all red cards are pulled. The destroy date is examined and all cards for other "red" years, i.e. 1986, 1991, etc. are returned to the file. The cards for 1981 are used to locate the documents to be destroyed.

CHEYENNE RIVER SIOUX TRIBE

CENTRAL RECORDS

RECORD RETENTION

A sample record retention schedule has been included as a part of this manual to serve as guidelines for record retention. The schedule should be reviewed by the Tribal Attorney at least every three (3) years to assure that all applicable laws are being met. Since it is possible that the various laws and regulations pertaining to record retention may change from time to time, it would be worthwhile to review the adequacy of the schedule periodically.

Guidelines used for the preparation of the retention schedule are as follows:

1. Minimum requirements are to be based upon regulation imposed by Council.
2. Blocks of five years used, required retention rounded up to nearest multiple of five.
3. Decision to microfilm based upon:
 - a. Volume of document.
 - b. Retention of age.
 - c. Incidence of use of document.
4. Decision to release based upon:
 - a. Whether or not original has been microfilmed.
 - b. Is an individual affected (Privacy Act Requirement).
 - c. Could the Tribe be jeopardized if document lost, altered or destroyed.

CHEYENNE RIVER SIOUX TRIBE
(SAMPLE)
RECORD RETENTION SCHEDULE

Security Code	Description	Retention (Years)				Microfilm		Release Original	
		5	10	15	Perm.	Yes	No	Yes	No
ACCOUNTING:									
(I)	Accounts Payable- Paid Invoices and Credits		X				X		X
(II)	Accounts Receivable- Trial Balance Ledger Sheets	X					X X		X X
(I)	Bank Statements- Statements and Reconciliations Cancelled Checks Entry Advices						X X X		X X X
(I)	Capital Asset Re- Cords Real Estate Personal Property Depreciation Records				X X	X X			X X
(I)	Cash Disbursements- Numerical Copy of Vouchers				X		X		X
(I)	Cash Receipts and Deposits		X				X		X
(I)	Employee Travel- Expense Reports		X						
(I)	Financial Statements				X	X		X	
(I)	General Ledger				X		X		X
(I)	Other Original Jour- nals				X		X		X
(II)	Tax Returns- Copies of Returns Reconciliations Com- puted Workpapers				X X	X X X		X X X	
(II)	Uncollectible Accts. (After last collec- tion effort)		X				X		X

CHAYENNE RIVER SIOUX TRIBE
(SAMPLE)
RECORD RETENTION SCHEDULE

Security Code	Description	Retention (Years)				Microfilm		Release Original	
		5	10	15	Perm.	Yes	No	Yes	No
ADMINISTRATIVE:									
Agreements -									
(I)	Contracts				X	X		X	
(I)	Deeds				X	X			X
(I)	Lease (after expiration)	X				X			X
(I)	Licenses (after expiration)	X				X			X
(I)	Annual Reports (two copies)				X	X		X	
(I)	Articles of Incorporation				X	X			X
(I)	Audit Reports				X	X		X	
(I)	Constitution and By-Laws				X	X			X
(I)	Correspondence, General	X					X	X	
(I)	Insurance Policies - Summary of Coverage Claims (after settlement)			X		X		X	
(II)	Legal Proceedings - (After completion)	X	X		X				X
(I)	Minutes				X	X			X
INVENTORY AND PURCHASING:									
(I)	Correspondence	X					X		X
(I)	Freight Documents	X					X		X
(I)	Inventory Records		X				X		X
(I)	Purchase Orders and Controls (after completion)		X			X			X
(I)	Receiving Reports	X					X		X

CHEYENNE RIVER SIOUX TRIBE

(SAMPLE)

RECORD RETENTION SCHEDULE

Description	Retention (Years)				Microfilm		Release Original	
	5	10	15	Perm.	Yes	No	Yes	No
PAYROLL:								
(II) Assignments, attachments and garnishments (after termination)	X					X		X
(II) Deduction authorizations (after termination)	X					X		X
(II) Employee earnings records		X				X		X
(II) Payments and Government Reports		X			X		X	
(II) Payroll Register				X		X		X
(I) Retirement and Pension Plan Records				X		X		X
(I) Time Cards						X		X
PERSONNEL:								
(II) Absence Records (including sickness and vacation)	X					X		X
(II) Accident Reports (after settlement)		X				X		X
(II) Contracts with employees (after termination)		X				X		X
(II) Employee benefits (after expiration)	X					X		X
(II) Employee Application (not employed)	X					X		X
(II) Individual Fidelity Bonds (after termination)	X					X		X
(II) Individual Personnel Files (after termination)	X					X		X

CHEYENNE RIVER SIOUX TRIBE

CENTRAL RECORDS

FILING CODE

100 Sovereignty

110 Treaties and Acts - Executive Order

120 Litigation & Lawsuits

130 Legislation CNI. Weekly Report

131 Federal - Public Law - Congressional Legislative Schedule

131.1 Federal Register

132 State

200 CONSTITUTIONAL OFFICES & ADMINISTRATION

210 Tribal Constitution

211 Formation & Adoption

212 Amendments

220 Constitutional Offices & Bodies

221 Chairman

221.1 Election Procedures

221.2 Constitutional Amendments & Council Directives

222 Secretary

222.1 Election Procedures

222.2 Constitutional Amendments & Council Directives

223 Treasurer

223.1 Election Procedures

223.2 Constitutional Amendments & Council Directives

224 Council

224.1 Election Procedures - Oath of Office

224.2 Constitutional Amendments & Council Directives

224.21 Redistricting

- 224.3 Meeting Notices & Agenda
- 224.4 Minutes (Monthly Budget Reports)
- 224.5 Resolutions
- 224.6 Committees-Testimony-Memos, Requests, etc. to
(Meetings) Individual Committees
 - 224.61 Formation & Function (By name)
 - 224.62 Minutes (By name)
- 224.7 Policy & Regulation
 - 224.71 Land & Natural Resources (Incoming and
Outgoing Correspondence)
BIA Head Counts
 - 224.72 Hunting & Fishing
 - 224.73 Tax Association
 - 224.74 Ordinances
- 224.8 Districts - (meetings, etc.)
- 224.9 Public Relations Correspondence

230 Administrative Organization Chairman, Secretary, Treasurer,
& Offices inside of Tribal Offices
Council Members

231 Correspondence

- 231.1 Incoming Chrono - Mailgrams
- 231.2 Incoming Subject
- 231.3 Outgoing Chrono
- 231.4 Outgoing Subject
- 231.5 Interoffice Receiving Chrono - cc:Resolution, Appoi-
ntment Letters
- 231.6 Interoffice Receiving Subject
- 231.7 Interoffice Sending Chrono
- 231.8 Interoffice Sending Subject

232.1 Administrative Staff & Personnel Management

232.11 Administrative Officer - Correspondence Sent

- 232.12 Property & Supply Officer - Correspondence Sent
- 232.13 Tribal Accountant - Correspondence Sent
- 232.14 Tribal Treasurer - Correspondence Sent
- 232.2 Personnel Management
 - 232.21 Federal Programs Hiring Board
 - 232.22 Personnel
- 233 General & Statistical
 - 233.1 Population
 - 233.11 U.S. Census
 - 233.12 Tribal
 - 233.121 Enrollment/Enrollment Office
 - 233.122 Claims
 - 233.13 State
 - 233.14 Local
 - 233.2 Archives (Museums)
 - 233.3 Non-Tribal Program Resources, Input & Outlays
 - 223.31 Other Indian (UTETC) United Tribes Educational Training Center (Student Evaluations & Appraisals)
 - 233.311 United Sioux Tribes (Subject Alphabetical)
 - 233.312 South Dakota Indian Associations
 - 233.3121 SD Tnd. Education Ass'n.
 - 233.3122 SD Ind. Business Development
 - 233.3123 SD Ind. Cattleman's Ass'n.
 - 233.3124 SD Tnd. Planner's Ass'n.
 - 233.3125 BHSNC (Black Hills Sioux Nation Council)
 - 233.313 Out of State & National Indian Organizations

- National Indian Health Board
- 233.3140 **NANRDF** - United Effort Trust
Native American Natural Resource Development Federation
- 233.3131 **Ass'n** of American Indian Physicians
- 233.3132 Am. Indian Law **Center**
- 233.3133 AIPRC (American Indian Policy Review Commission)
- 233.3134 NCAI (National Congress of American Indians)
- 233.3135 NTCA (National Tribal Chairman's Association)
- 233.3136 NAICA (National American Cattleman's Association)
- 233.3137 AIBA (American Indian Business Association)
- 233.3138 4-SIHB (Four-State Indian Health Board)
- 233.3139 NARF (Native American Rights Fund)
- 233.314 South Dakota Indian Tribes
 - 233.3141 Rosebud
 - 233.3142 Pine Ridge
 - 233.3143 Sisseton-Wahpeton
 - 233.3144 Yankton
 - 233.3145 Lower Brule
 - 233.3146 Standing Rock
 - 233.3147 Flandreau
 - 233.3148 Crow Creek
- 233.32 Federal
- 233.32 Federal (FHA) Department of Transportation Aviation Administration

- 233.321 BIA (Use Branches) (700)
Memo from Area Dir. Civil Ser-
vice Commission FHA Office of
Secretary, Office of Treasury
- 233.322 IHS (Use Branches) Indian
Health Services
- 233.323 HEW Health, Education & Wel-
fare, Social Security Chrono
- 233.324 Dept. of Labor
- 233.325 Old West Regional Commis. OWRC
- 233.326 HUD (Housing & Urban Develop-
ment)
- 233.327 MPFRC - Moutain Plains Fed-
eral Region Council
- 233.328 Action
- 233.329 Dept. of Transportation
Federal Aviation Admin.
- 233.33 State (Use State Agency Directory as
guide)
 - 233.331 State Coordinator of Indian
Affairs
 - 233.332 Social Services
 - 233.333 Labor
 - 233.334 Planning Bureau
 - 233.335 Agriculture
 - 233.336 Health
 - 233.337 Public Safety
 - 233.338 Ed. & Cultural Affairs
 - 233.339 Environmental Protection
 - 233.340 Extension Office
- 233.34 Local - War Hawk Civil Defense
 - 233.341 Town of Eagle Butte
 - 233.342 Dewey County

- 233.343 Ziebach County
- 233.35 Private
 - 233.351 Religious
 - 233.352 Charitable & Benevolent
 - 233.353 Commercial & Industrial
- 233.36 Human Resources
 - 233.361 Educational - Higher Education
Community College, School Board Meetings
 - 233.362 Health - Food Stamp Correspondence
- 233.37 Natural Resources
 - 233.371 Land
 - 233.372 Water
 - 233.373 Minerals - CERT - Council of
Energy Resource Tribes - Federal
Energy Administration -
National Energy Policy Recommendations
- 233.38 Industrial Resources (Business)
- 234 Legal Counsel
 - 234.1 Correspondence
- 300 ENTERPRISE MANAGEMENT & CONTROL (Identified by name in parentheses)
 - 310 Legislation & Regulation - Program Rules & Regulations
 - 311 Tribal
 - 312 Federal - Tribal Government & Federal Domestic Assistance Programs
 - 313 State
 - 314 Local
 - 315 Private
 - 320 Primary Funding Source
 - 320 Primary Funding Source - Grants

- 321 Tribal
- 322 Federal
- 323 State
- 324 Local
- 325 Private

330 Matching Funds & Inkind Contributions - Grants

- 331 Tribal
- 332 Federal
- 333 State
- 334 Local
- 335 Private

340 Resources - Grants

- 341 Other Tribal
- 342 Federal
- 343 State
- 344 Local
- 345 Private
- 346 Human
- 347 Natural
- 348 Industrial

350 Implementation & Accounting - Agreements, Contract, Grants

- 351 Project Scope & Organization (PHS)
 - 351.0 Msc1. Working Papers, etc. (Temporary File) News Clippings - News Releases - Newsletters
 - 351.1 Governing Composition & Minutes
 - 351.2 Advisory Composition & Minutes - Nutrition Project Council Minutes
- 352 Project Administration - Proposals, Programs
 - 352.1 Correspondence (follow 231.1 corres. file format)
 - 352.11 Incoming Chrono - WIC

- 352.12 Incoming Subject
- 352.13 Outgoing Chrono
- 352.14 Outgoing Subject - Proposals
- 352.15 Interoffice Receiving Chrono
- 352.16 Interoffice Receiving Subject - Delegation of Authority
- 352.17 Interoffice Sending Chrono
- 352.18 Interoffice Sending Subject
- 352.2 Personnel Management
 - 352.21 Staff
 - 352.211 Alphabetical File (LAST NAME, FIRST, MI)
(Resumes, Resignations, Apptmt. Letters, Terminations, Warnings, Promotions, Suspensions)
 - 352.22 Job Descriptions, Advertisements and relating correspondence, applications and selections all filed by Job Title
 - 352.23 Personnel Memos, Policies, & Procedures
 - 352.24 Program Outgoing Personnel Services - Policy Board - (set up file according to the agencies or other programs to which this program supplies staff or labor)
- 352.3 Reports & Evaluations - To Individual Committees - Annual Reports & Regular Reports
 - 352.31 Program Reports to CRST Council - Monthly Reports - Quarterly Reports - CHR Activity Reports, Commodity, TWEP
 - 352.32 Project Reports to Funding and/or Other Agencies
- 352.4 Conferences, Meetings, Training Sessions, Workshops-- all filed by Title, Location and Dates
- 353 Project Accounting
 - 353.1 Budgets - Swiftbird Project - Monthly Budget Reports, Annual Financial Reports, Quarterly Reports

353.2 Audits - Correspondence

353.3 Accounting Records - CRST Bank Reconciliations & Internal Reconciliations of Cash Accounts, Revenue Sharing Reports, Buy-Indian Contracts - Financial Reports

353.31 Vouchers - Public Vouchers (Ex) Indian Act

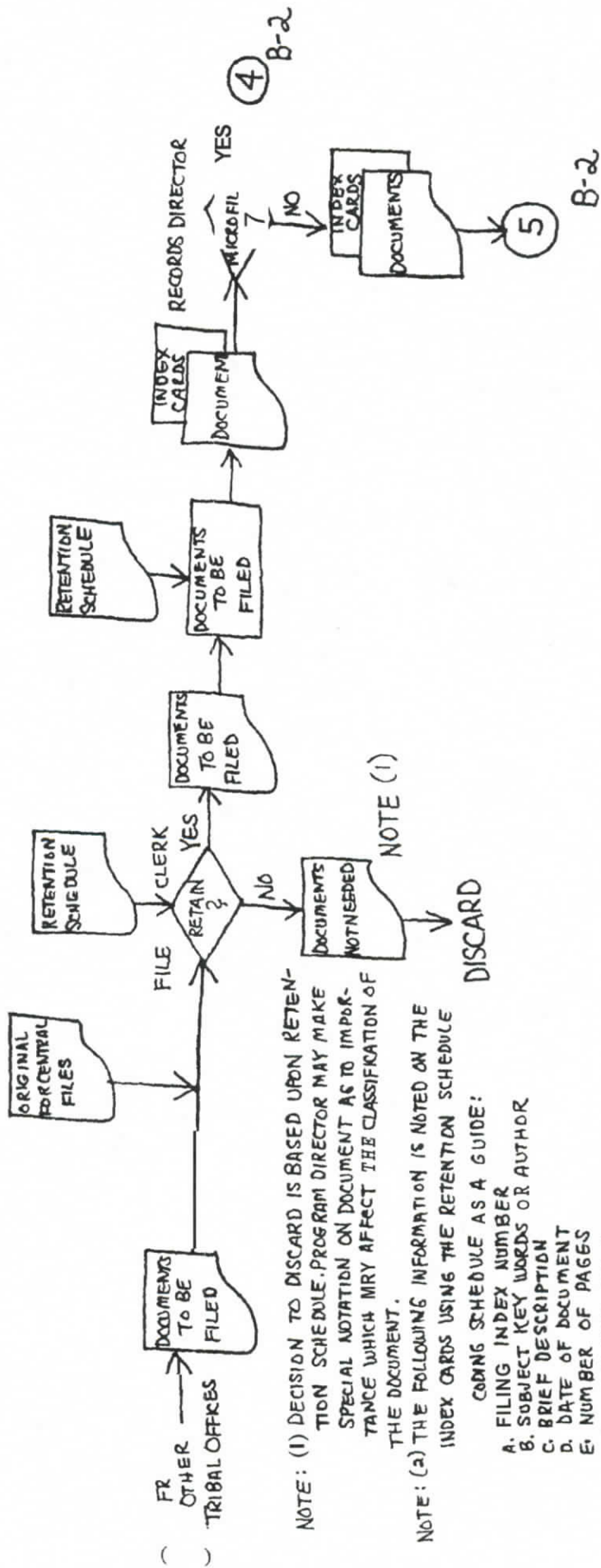
353.32 Expenditures Compared with Budget

400 Individual Persons File

410 Education

CHEYENNE RIVER SIOUX TRIBE
CENTRAL RECORDS
(FILING OF DOCUMENTS)

B-1



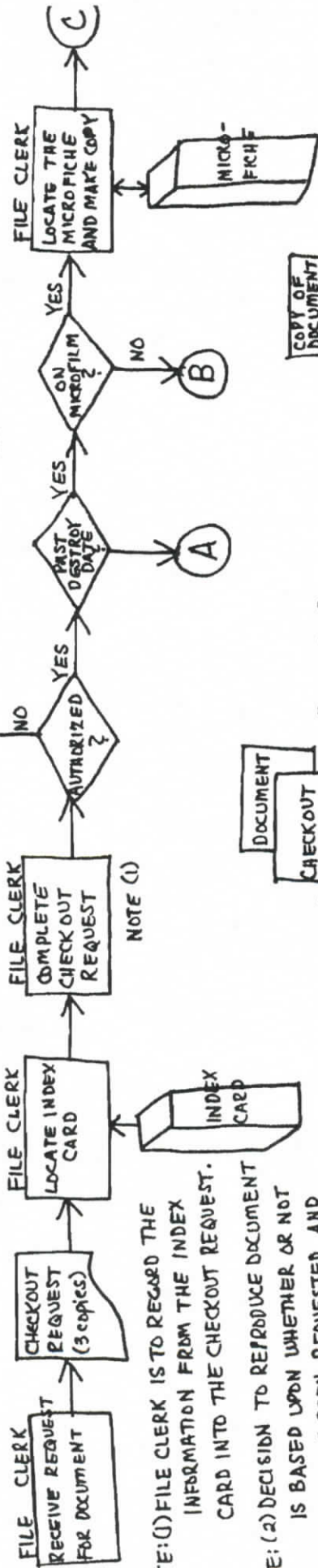
NOTE: (1) DECISION TO DISCARD IS BASED UPON RETENTION SCHEDULE. PROGRAM DIRECTOR MAY MAKE SPECIAL NOTATION ON DOCUMENT AS TO IMPORTANCE WHICH MAY AFFECT THE CLASSIFICATION OF THE DOCUMENT.

NOTE: (2) THE FOLLOWING INFORMATION IS NOTED ON THE INDEX CARDS USING THE RETENTION SCHEDULE CODING:

- A. FILING INDEX NUMBER
- B. SUBJECT KEY WORDS OR AUTHOR
- C. BRIEF DESCRIPTION
- D. DATE OF DOCUMENT
- E. NUMBER OF PAGES
- F. DESTROY DATE AND COLOR CODING
- G. SECURITY CODE

CHEYENNE RIVER SIOUX TRIBE
CENTRAL RECORDS
(RETRIEVAL OF DOCUMENTS)

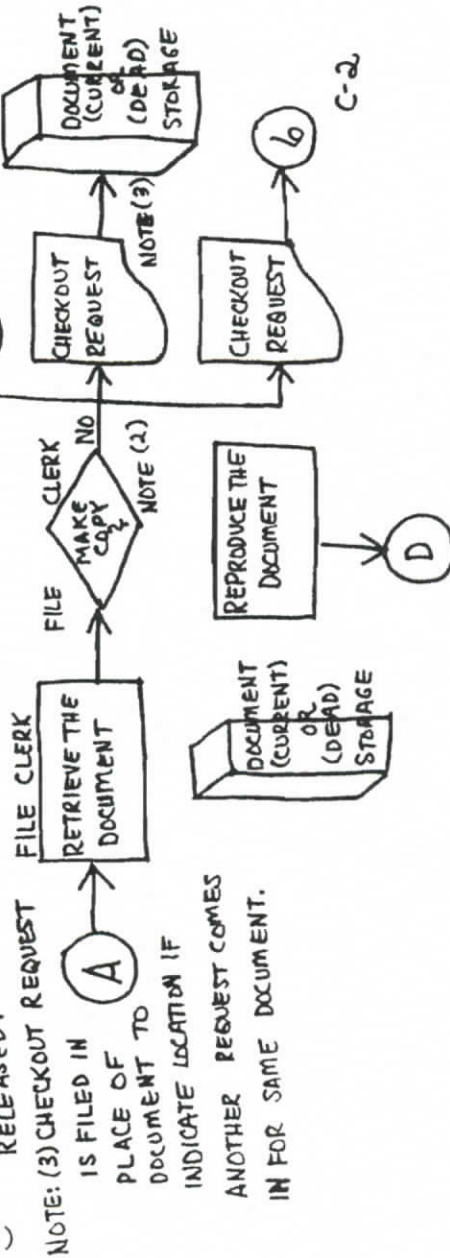
C-1



NOTE: (1) FILE CLERK IS TO RECORD THE INFORMATION FROM THE INDEX CARD INTO THE CHECKOUT REQUEST.

NOTE: (2) DECISION TO REPRODUCE DOCUMENT IS BASED UPON WHETHER OR NOT COPY HAS BEEN REQUESTED AND WHETHER OR NOT ORIGINAL CAN BE RELEASED.

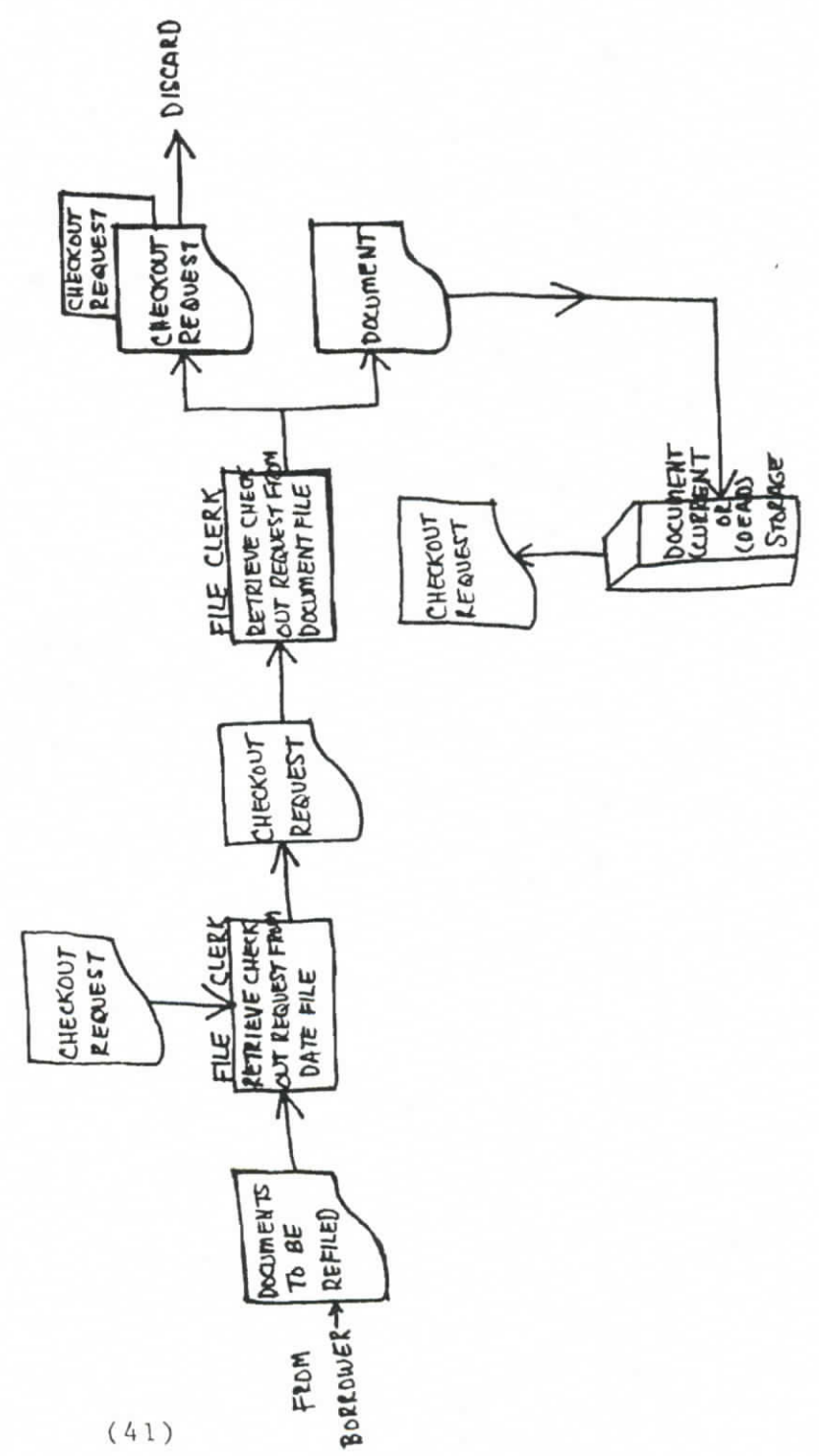
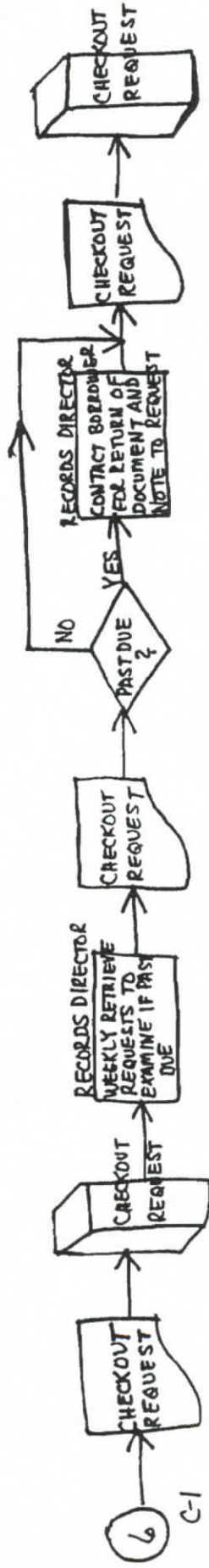
(40)



NOTE: (3) CHECKOUT REQUEST IS FILED IN PLACE OF DOCUMENT TO INDICATE LOCATION IF ANOTHER REQUEST COMES IN FOR SAME DOCUMENT.

C-2

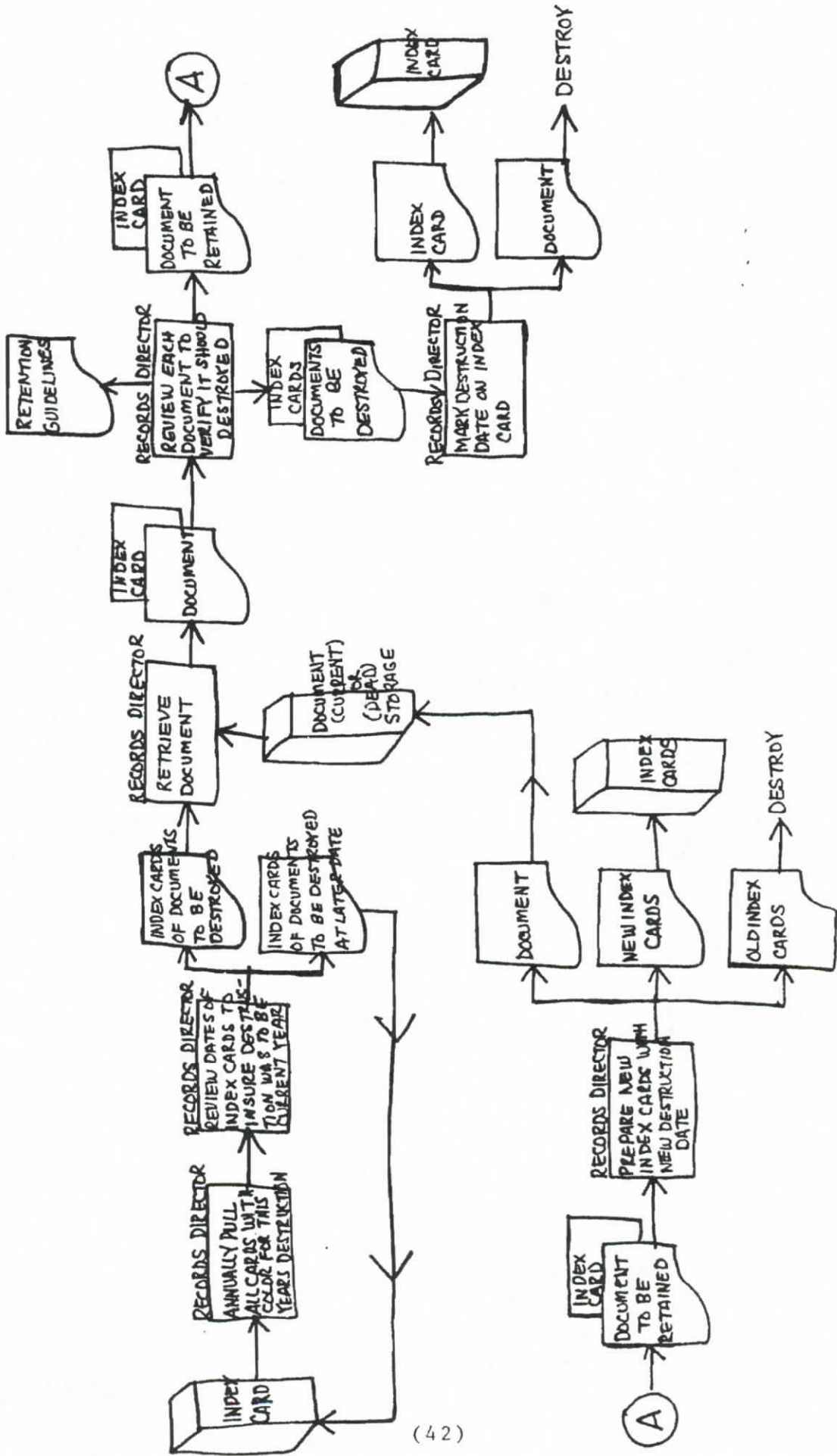
CHEYENNE RIVER SIOUX TRIBE
 CENTRAL RECORDS
 (RETRIEVAL OF DOCUMENTS)



CHEYENNE RIVER SIOUX TRIBE
CENTRAL RECORDS

(DESTRUCTION OF DOCUMENTS)

D-1





CENTRAL RECORDS DEPARTMENT

Cheyenne River Sioux Tribe

INDEX CARD - FILING SYSTEM

(MODIFIED)

Implemented: June 1, 1982

INDEX CARD SYSTEM (MODIFIED)

The Catalog Card System allows the user to locate material in a quick and efficient manner. In most cases when an individual or program calls upon the Central Records Dept. for information and documentation; There is a need for immediate retrieval; the Index Cards System combined with a numerical Classification System adequately meets the needs of the Cheyenne River Sioux Tribe.

INFORMATION TO BE HAD FROM THE CARD CATALOG IS:

1. Whether certain information is on file.
2. Whether certain information by a specific person or agency is on file.
3. Location of Material (Code Number)

The Card Catalog System is an Index to all the materials and documents that are on file. The cards are arranged alphabetically and filed in drawers labeled with the letters of the alphabet. Subject guides are inserted in all high use areas. Subject cards define a specific area, program, subject, or person.

EXAMPLE: A drawer labeled A-D contains cards beginning with the letters A, B, C, D, E. A subject guide labeled CRST contains cards beginning with Cheyenne River Sioux Tribe.

KINDS OF CATALOG CARDS:

1. Subject Cards: are used to locate material on a particular subject, such as, Law and Order, Tribal History, Water Irrigation.
2. Title Cards : are used to locate work with a distinctive title such as, BIA, CRST, HEW, etc.
3. Author Cards : are used to locate works/materials with a particular author such as, Ducheneaux, Ford, Kneip, etc.

In the present modified system, a combination of the above mentioned may be used as the main heading for quicker and more precise identi-

fication such as SUBJECT/AUTHOR, etc.

Currently, the Central Records Dept. uses and stores documents in two (2) power files. Documents are entered in a file folder in chronological order. Location code number, file title, and year is typed on the folder.

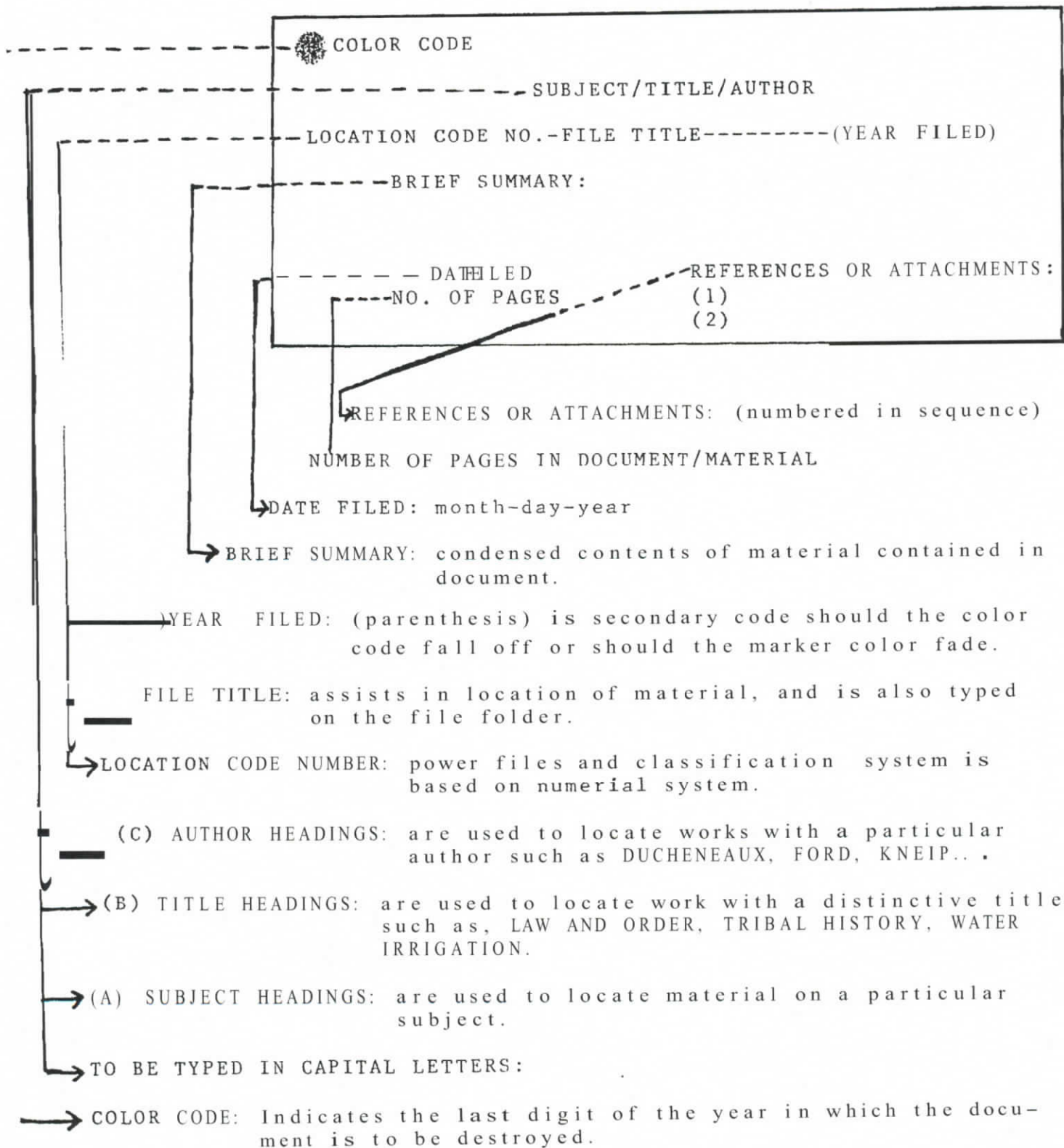
A simple modification is being implemented, wherein precise definition between the different parts of the index cards can be identified. Specifically, the heading which consists of the subject/title/author, or combination of these are centered on the top of the cards. Clear definition of the different parts of the index cards are established by the use of 2 or 3 spaces between the sections. Retrieval is facilitated by being able to quickly scan rapidly the subject first, then the location next.

Little or no cross-reference is done, because basically, all documents do not come in the same time. Actually, all departments and programs should be required to evaluate their files and send to the Central Records Dept., the materials that they wish to have filed. Employee orientation should be given, so that the various programs have a basic comprehension of the purpose and standardized filing system of the Central Records Department.

The same modified system of the index cards can and will probably be used for the extensive amount of microfilm records that have been processed.

A color coding system is attached indicating when documents should be destroyed. A color dot or color marker is used on the left upper hand corner of the index cards. Also the year that the documents were filed, is typed in after the file title.


CENTRAL RECORDS
INDEX CARD CATALOG FILING SYSTEM
(Modified)



CENTRAL RECORDS


INDEX CARD CATALOG FILING SYSTEM
(Implemented; June 1, 1982)

(Example/Outline)

	=Color Code
SUBJECT/TITLE/AUTHOR	
Location Code No.-File Title-	(Year Filed)
Brief Summary:	

Date Filed:	References or Attachments
NO. of Pages:	1) _____
	2) _____

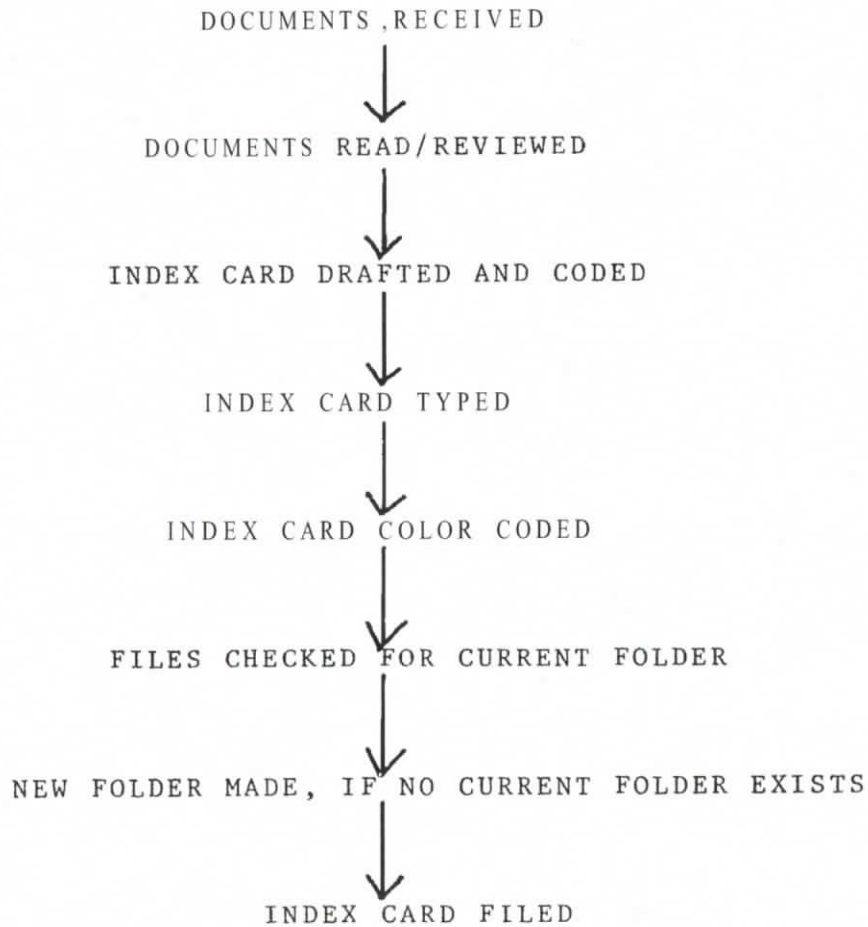
(EXAMPLE)

	REHAB DEPT. / JOHN DOE
231.2	Chairman Incoming Subject (1980)
Letter from Mr. John Doe requesting investigation/audit of debt owed to Rehab Program.	
May 3, 1980	
2 pages	

CENTRAL RECORDS

INDEX CARD - FILING SYSTEM

FLOW CHART PROCEDURE



THE FOLLOWING INFORMATION IS CONTAINED ON THE INDEX CARDS
OF THE CRST CENTRAL RECORDS DEPARTMENT

1. COLOR CODE: Retention Period of Document/Destruction Date, Color Code-(left hand corner of document)
2. KEY WORDS: Subject/Title/Author (Above could be combined - Example= Subject/Author)
3. LOCATION OF CODE NUMBER
4. FILE TITLE: For example, Chairman-Incoming Subject
5. YEAR FILED: Back-up destruction date, in case color code dot falls off
6. SUMMARY: Brief Description of Document
7. DATE FILED: . Month/Day/Year
8. NUMBERS OF PAGES OF DOCUMENT
9. REFERENCES OK ATTACHMENTS
10. SECURITY CODE

CENTRAL RECORDS FILING SYSTEM

TYPE

The CRST Central Records Filing System is Numerical-Subject, as opposed to the Alphabetical-Subject. The advantages of the Numerical System include:

1. Infinite Expandability.
2. Uniformity of Classification (A safeguard against personnel turnover).
3. Allows for Confidentiality.

HOW IT WORKS

Initial Filing - Each folder is assigned a CRST call number taken from the Master File Guide, set up on Numerical basis.

An index card system is prepared and filed by the Subject/Title Author; these are filed alphabetically.

RETRIEVAL

In most cases, the reader will be able to locate the desired file directly, without having to use the card index. If direct location of a particular folder cannot be done, then the subject/title/author index file is at its disposal.

Thorough Indexing of the material is the key function to be undertaken with extreme care, by its establishment, rapid retrieval of information will be possible.

DEFINITIONS

RECORD: An item of information used in the normal course of business. This could be a sheet of paper or a piece of microfilm.

DOCUMENT: Any paper of information, generated either, manually or by machine, or a combination thereof.

MICROFILM: A photographic film containing an image of an item of information that is greatly reduced in size from the original; the images are too small to be read without magnification.

MICROFICHE: A sheet of microfilm.

MICRO-ROLL: A roll of microfilm.

Responsibility of Central Records Department:

1. Aggressively collect specified documents.
2. Catalog and index documents.
3. Microfilm documents (Working Copy and Vault Copy)
4. Store documents or forward to others for storage.
5. Destroy documents or notify others to destroy documents.
6. Destroy microfilm or notify others to destroy microfilm.
7. Retrieve documents (or copies thereof) on request.
8. Maintain costs of operations.

MICROFILM CAMERA PROCEDURE

1. Load camera as quickly as possible- side one up.
2. Run leader- (Advance 125 spaces).
3. Film certification document.
4. Film resolution target.
5. Film density target.
6. Film start of roll target.
7. Space (one).
8. Film identification target.
9. Film documents.
10. Space (one).
11. End of roll target.
12. Density target,
13. Resolution target.
14. Certification document.

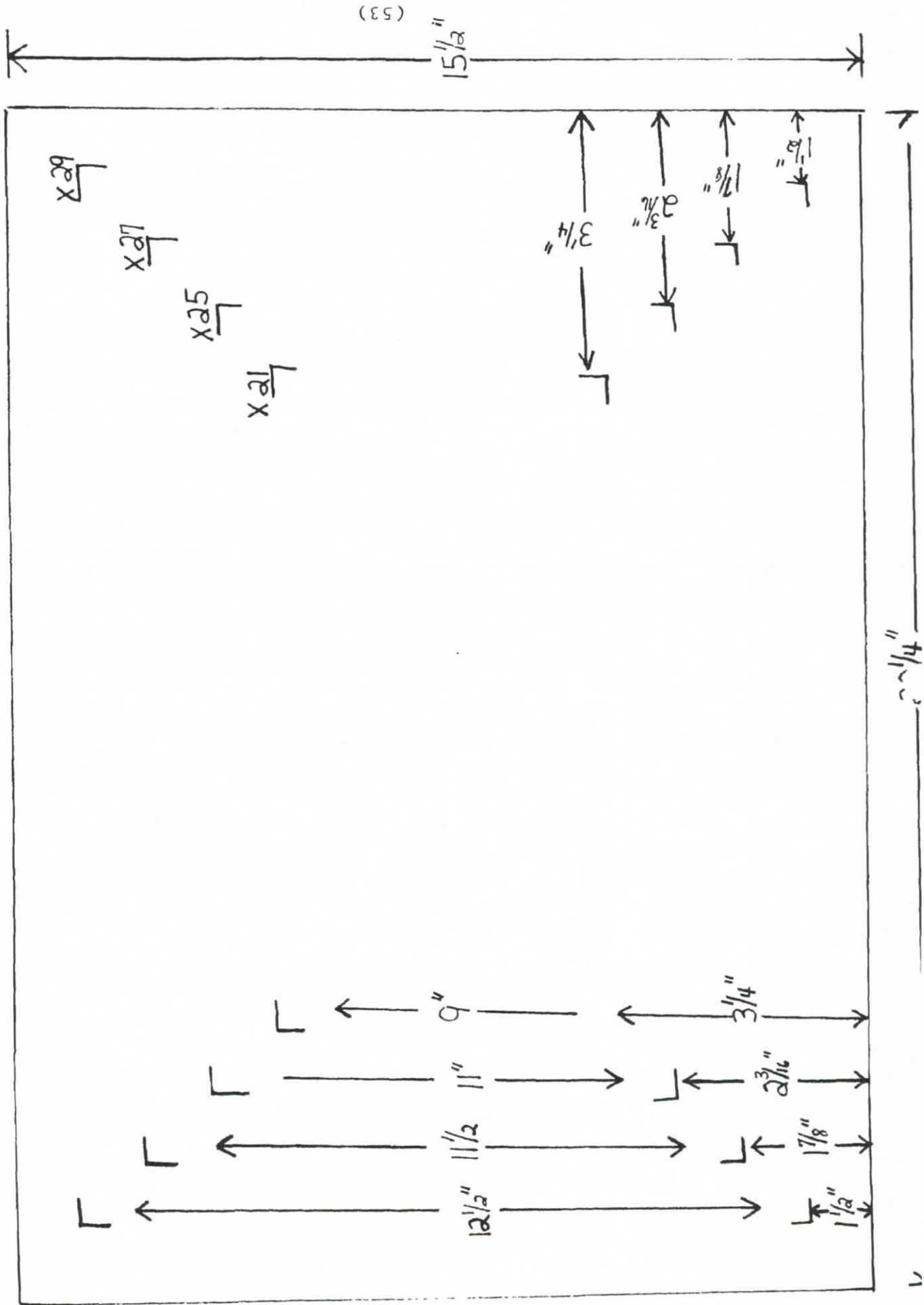
15. Run trailer- advance 125 spaces.

Use micro file separator between each subject, when filing. When a mistake is made, use this procedure:

- A. Space
- B. Film- start/retake target
- C. Film- correction guide
- D. Film- retake of mistake
- E. Film- end of retake target

Space than resume microfilming.

MICRO FILM CAMERA TABLE
 (REDUCTION RATIO MEASUREMENTS FOR DOCUMENT PLACEMENT)

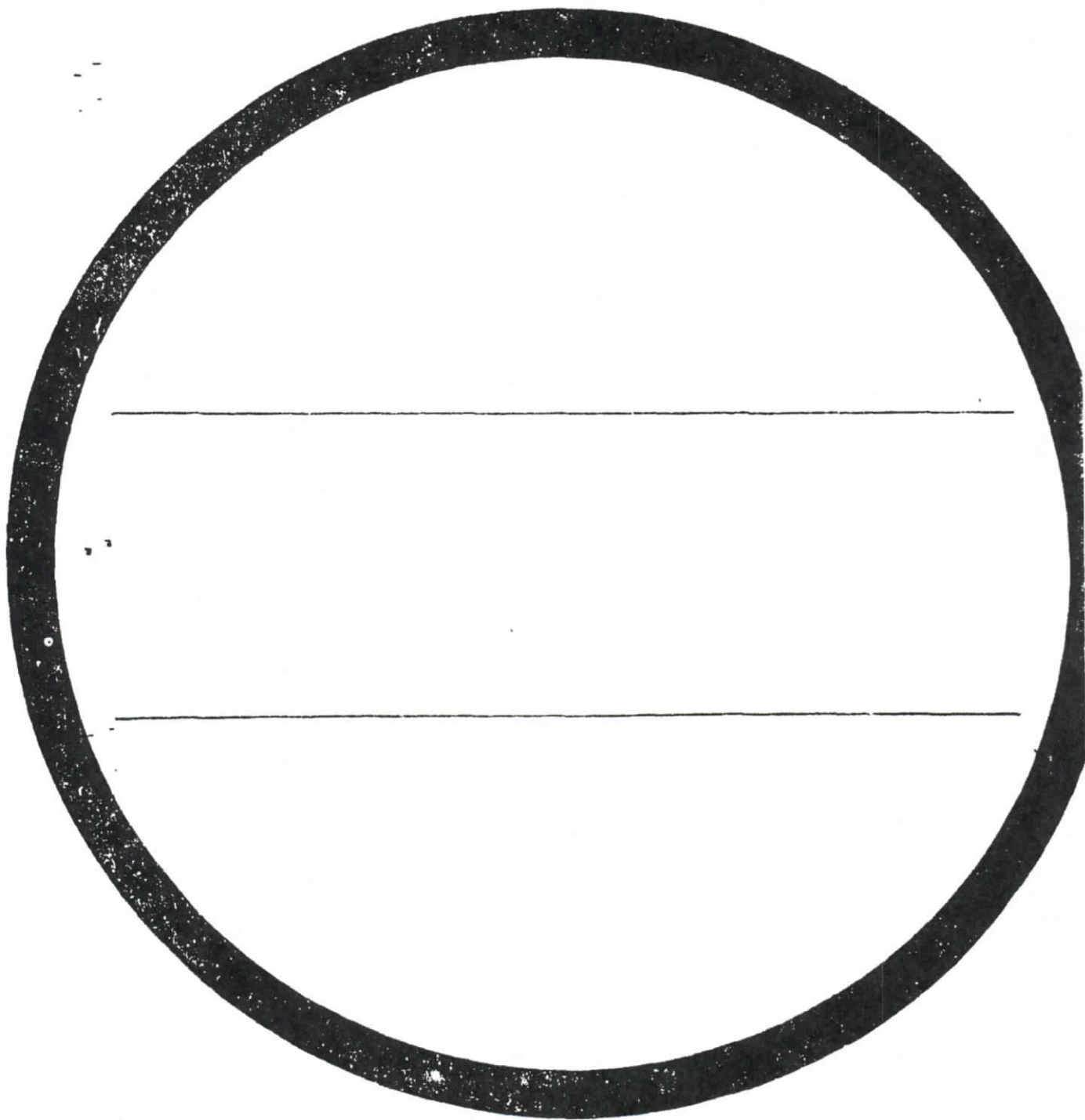


**START
OF
RETAKE**

**END
OF
RETAKE**

**THE REPRODUCTION
OF THE FOLLOWING DOCUMENT
CANNOT BE IMPROVED
DUE TO THE CONDITION
OF THE ORIGINAL**

Southwest Microfilm



PROJECT NUMBER		FILM FILE NUMBER		FILM CONTROL NUMBER	
DEPT.			AUTHORITY		
DATE STARTED	HOUR	DATE FINISHED	HOUR	CAMERA OPERATOR	PROJECT SUP.

RECORD IDENTIFICATION
RECORD ARRANGEMENT
AUTHENTICATION

FILM INDEX DATA ENTERED

INDEX POINT	INDEX IDENTIFICATION DATA			INSPECTOR
(END)				
CAMERA HRS.	CAMERA HRS. LOST	REASON FOR LOSS	COUNTER	END
				START
				TOTAL
DOCUMENT DESCRIPTION & LOCATION		DEFECT	RETAKE YES NO	REMARKS
INSPECTED BY	DATE	INSPECTION APPR'D BY	DATE	
RETAKES BY	DATE	RETAKES SPLICED BY	DATE	
LABELED BY	DATE	APPROVED BY	DATE	

CERTIFICATE OF AUTHENTICITY

THIS IS TO CERTIFY that the microphotographs appearing on this Film-File starting with _____ and ending with _____ are accurate and complete reproductions of the records of (Company and Dept.) _____ as delivered in the regular course of business for photographing.

IT IS FURTHER CERTIFIED that the microphotographic processes were accomplished in a manner and on film which meets with requirements of the National Bureau of Standards for permanent microphotographic copy.

Date Produced _____
(Date)

Camera Operator

Place _____
(City) (State)

START

OF

ROLL

ROLL NO. _____

DOCUMENT TYPE _____

DATE OF FILMING _____

CAMERA OPERATOR _____

STARTING DOCUMENT--: _____

END OF ROLL

ROLL NO.

DOCUMENT TYPE _____

DATE OF FILMING _____

CAMERA OPERATOR _____

ENDING DOCUMENT _____

RECORDS TRANSFER FORM

From (Department): _____
 Transfer Date: _____
 Records Officer or Office Supervisor _____ Phone _____
 Transferred to (Location): _____
 Number of Boxes Transmitted: _____

Box Number	Records Storage Location	Title/Description	Disposal Date

For Central Records Department Use: _____

Date Received: _____ Signature: _____

TO: CHEYENNE RIVER SIOUX TRIBAL RECORDS DESTRUCTION BOARD
RE: PETITION FOR AUTHORITY TO DESTROY RECORDS

DATE: _____

This petition is made by: _____ (Signature)
Title: _____ Department _____

To destroy the following described Tribal records:

DESTRUCTION AUTHORITY

I hereby certify that the Tribal Records Destruction Board met on the date of: _____ and authorized the above or attached described Tribal records to be destroyed in the foregoing petition.

Chairman of the Board _____ Date _____

Recommended Other Disposition: _____

REQUEST FOR PAPERS (OUT)

Date: _____

Papers wanted on _____
Date

Description of Papers: _____

Date: _____

Name: _____

Address: _____

Subject: _____

Wanted by: _____

Department: _____

For Central Records Department Use: _____

Follow-Up: _____

Return Date: _____

FEDERAL LAWS AND RECORDS MANAGEMENT

A. Introduction

Individuals charged with the responsibility of records management must also be aware of the impact of federal laws on the records which they manage. Tribal organizations receive federal funds from many agencies. These funds are affected by two statutes -- The Freedom of Information Act and the Privacy Act. In addition, tribes receive funds from the Bureau of Indian Affairs (BIA) and Indian Health Service (IHS) under P.L. 93-638, the Indian Self-Determination and Education Assistance Act. This statute also provides guidance concerning the records management function. Finally, tribal organizations receive funds from federal agencies which require compliance with certain federal guidelines. These guidelines (such as OMB Circular A-102) contain requirements for records management. Each of these factors are addressed in the following discussion.

B. Freedom of Information Act

Before the passage of the Freedom of Information Act, the records management provisions of the federal government were governed by the provisions of Section 3 of the Administrative Procedures Act of 1946. This Act permitted the federal agencies to encourage withholding instead of disclosing information. Among other things it authorized federal agencies to keep information secret for "good cause found" or "where secrecy was in the public interest" or where "the information had a bearing on a matter relating solely to the internal management of an agency." Under the Administrative Procedures Act a federal agency was required to provide information only to persons directly concerned.

However in 1966, Congress enacted comprehensive legislation dealing with the problems of access to federal information. The Freedom of Information Act of 1966 was a milestone legislation which reversed the long standing government secrecy practices. The Freedom of Information Act was enacted as an amendment to Section 3 of the Administrative Procedures Act and replaced the vague and general language of the prior law and made it clear that Congress' intent was that any person should have access to identifiable records without having to demonstrate or provide reasons. The burden of proof was placed on the federal government to show cause why such information should be withheld.

In 1974, amendments were passed which were designed to ease the process of obtaining access to government files. These amendments required the federal agencies to publish a comprehensive index for use in the administrative processing of requests for information. It also required that fees for locating and copying records be uniform and moderate. The amendments also shortened the government's time for answering complaints.

The Freedom of Information Act (FOIA) applies only to documents which are held by the administrative agency of the Executive Branch of the federal government. It does not apply to information obtained by the Congressional and Judicial branches. The records of the administrative agencies must be released to private individuals on request unless the information falls within one of nine specific and narrowly defined categories. The important point to note is that the Freedom of Information Act applies to documents which are held by the administrative agency of the Executive Branch of the federal government. FOIA then applies only to information held by the federal agency and not to information held by the tribal organization unless information has been transmitted by the tribe to the federal agency which then makes it under the purview of the FOIA.

The only information which may be withheld under the FOIA is that which falls within nine specifically designated categories. These categories are:

- * Classified documents concerning national defense and foreign policy
- * Internal personnel rules and practices
- * Information which has been exempted under other laws
- * Confidential business information
- * Internal communications
- * Protection of privacy of persons
- * Investigatory files
- * Information concerning financial institutions
- * Information concerning wells

The most important of these nine designated categories for your records management procedures is information which may be restricted because of protection of personal privacy.

As a records manager, not only are you concerned with the protection, storage, and filing of information, you also should be concerned with locating and obtaining of information desired by the tribe. Under the provisions of the Freedom of Information Act the records manager could act as the focal point for acquiring information from federal agencies. To obtain information which the tribal organization desires, the records manager must first determine which agency is most likely to have such information. A good starting point in determining which agency holds such information is a document called the United States Government Manual. This document lists all federal agencies and de-

scribes their function. In addition, it usually lists local and regional office addresses and phone numbers. This manual can be obtained by purchasing it from the Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. for a cost of \$6.50.

If the records manager has reason to believe that a local field office of a federal agency has information which the tribe is seeking, it may then be helpful to contact that local field office with regards to your request.

When you as a records manager have accumulated as much information about the records that you desire, then you should next write a letter. This letter should be directed to the head of the federal agency whose address can be found in the government manual. Alternatively, you may write to the Freedom of Information officer of the federal agencies. It is also a good idea to write Freedom of Information request on the bottom left hand corner of the envelope in which the request is contained. The records which you want should be defined as accurately as possible. The Freedom of Information Act does not require that you specify a document by name or title but your request must reasonably describe the information which you seek.

Remember that the FOIA does not require that individuals seeking information demonstrate a need or even a reason for wanting such information. However, the probability of getting the information you desire may be increased by explaining your reason for requesting it.

The 1974 amendments to the FOIA made it clear that Congress intended that fees should not be used for the purposes of discouraging requests. Each agency is therefore required to publish a uniform schedule of fees governing all divisions of that federal agency. Generally speaking, fees for searching for a document run about \$5.00 per hour. The average charge of copying a document is ten cents a page for standard size copies. It is entirely possible that you may obtain a waiver or a reduction of the fees if you state your reasons for requesting the information.

Federal agencies are required to respond to all requests for information within ten (10) working days after receipt of the request. If you are in a hurry to obtain such information, you may want to send your letter by Certified Mail asking for a Return Receipt so then that you know when the ten days has expired. Federal agencies having difficulty meeting your requirements within the ten day time period are required to inform you in writing about an extension.

A sample letter of request is shown on the next page requesting information for a document under the FOIA.

LETTER SAMPLE REQUESTING INFORMATION

Agency or FOIA Officer
Title
Name of Agency
Address of Agency
City, State, Zip

Reference: Freedom of Information Act Request

Dear

Under the provisions of the Freedom of Information Act, 5 USC 52, I am requesting access to (identify the records clearly and specifically as possible). If there are any fees for copying the records I have requested, please inform me before you fill the request (or please supply the records without informing me if the fees do not exceed _____dollars).

I am requesting this information (state the reason for your request if you think it will assist you in obtaining the information).

If all or any part of this request is denied, please cite the specific exemption which you think justifies your refusal to release the information and inform me of the appeals procedures available to me under the law.

I would appreciate your handling this request as quickly as possible and I look forward to hearing from you within ten (10) days as the law stipulates.

Sincerely,

Signature

Tribal organizations contemplating contracting under P.L. (93-638) must obtain as much information as possible about the programs which they are considering contracting. Tribal organizations are entitled to request access to all information held by the BIA subject only to the nine limitations of the FOIA and of the Privacy Act.

Tribal organizations needing information from the Bureau of Indian Affairs could request information during at least five different phases of the contracting process. These phases are:

- * Deciding whether to contract or not
- * Preparing a contract application
- * Responding to request for information from the Bureau during the contract application review process
- * Preparing to begin operations after contract has been awarded
- * During the operation of the program

The Tribal organization and the records manager could identify a need to obtain information on the amount of Bureau funds which the Tribe is entitled to contract for. The information requested might include information about past, present, and projected budgets for the program as operated by the Bureau. Additionally program plans, reports on program operations, evaluations and similar information may also be requested by the tribal organization. Tribal organizations preparing a contract application also need information on the equipment, facilities, and buildings which the BIA has assigned to particular projects. They also need information on Bureau staffing patterns, salaries, fringe benefits and other personnel information as well as a compilation of Bureau regulations which affect the program. If someone other than the Tribal government is requesting information, the request must be accompanied by a letter from the tribal governing body permitting such access.

Besides the requirements imposed on Federal agencies, P.L. 93-638 requires that tribal organizations provide the same opportunity for access to information to the Indian people which the programs serve. Tribal organizations who have contracts with the BIA and with IHS under the provisions of P.L. 93-638 are required to treat requests for information by tribal members served by such contracts the same as the federal agencies treat requests from private individuals. Tribal organizations must make information available to the Indian people which they serve unless such information falls within the nine exempt categories mentioned above.

The information desired by the tribal member must be requested in writing and must reasonably describe the reports and information desired. The request may be delivered or mailed to the tribal organization. Within ten working days after receiving the request, the Tribe must then determine whether to grant or deny such a request.

This ten day limit may be extended an additional ten days for good reason. If it is extended, the person who has requested the information must be notified in writing of the extension and the reasons for such extension.

The Freedom of Information Act permits individuals to obtain information held by federal agencies and permits tribal members to obtain information held by the tribe (under P.L. 93-638), unless such information falls within one of nine specific exempt categories. The records manager must be aware of the provisions of the FOIA which permit access to such records and if tribal members request such information concerning a tribal contract, they must be prepared to respond to such a request and to provide reason for denying such request if it falls within the nine exempt categories.

The primary reason for denying access to information is for the protection of privacy. Under the FOIA, Exemption (b) (6), Protection of Privacy, covers personnel, medical files and similar files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. This exemption relates to records which contain details about the private lives of individuals. It is the only exemption which allows a balancing of interest between disclosure and nondisclosure. The private citizens' right to know information must be weighed against the individuals' right to privacy. In court cases concerning a clearly unwarranted invasion of personal privacy, the courts have taken two separate approaches. In some instances they have balanced the potential severity of the privacy invasion against the general public interest to be served. In other instances the courts have considered the intrusion in relation to the needs and interest of the individual requesting such information.

C. The Privacy Act

The Privacy Act of 1974 was the culmination of many years of public and congressional concern over the threat posed to individual privacy by the federal government's increasing acquisition of vast amounts of personal information on American citizens. In November, 1974, the Privacy Act was passed by Congress in response to the concerns of both the public and the congressional legislators. It was signed into law by President Ford on the last day of that year and became effective in September of 1975.

The underlying purpose of the Privacy Act was given to citizens for more control over what information is collected by the federal government about individuals and how that information is used. The Act accomplishes this purpose in five basic ways:

1. It requires that agencies publicly report the existence of records maintained on individuals.
2. It requires that the information contained in these record systems be accurate, complete, relevant, and up to date.

3. It provides procedures where individuals can inspect and correct inaccuracies in almost all federal files about themselves.
4. It specifies that information about an individual gathered for one purpose, is not to be used for another purpose without that individual's consent.
5. It requires that federal agencies keep an accurate accounting of the disclosures of records and within certain exemptions make these disclosures available to the subject of the record.

The Privacy Act also provides penalties and sanctions to enforce these provisions.

The Privacy Act applies to only personal records maintained by the Executive Branch of the federal government concerning individual citizens. However provisions of the Privacy Act have often made applicable to federally funded organizations, in particular those organizations funded under P.L. 93-638. The records which are defined by the Privacy Act are groups of records from which information can be retrieved by reference to a name or other personal identifier such as a social security number.

As stated above, the Privacy Act permits individuals to inspect and correct inaccuracies in almost all federal files about themselves. This permits each individual to request personal records from a federal agency concerning themselves and is permitted to obtain access to information concerning themselves which is collected and maintained by the federal agency. The records manager of the tribal organization is also required to comply with the provisions of the Privacy Act for programs which have been funded under the provisions of P.L. 93-638. This enables individuals who are clients or employees of a tribal program to examine and obtain information from records maintained about themselves. The records manager is required to make such records available to the individuals involved. The individual can request that such information be provided to them and should identify the record desired along with stipulating that it is a Privacy Act request. The records manager should require some proof of identity before releasing the records. The individual requesting information would therefore provide identifying data such as a copy of an official document containing the individual's name, signature, and address. The tribal organization is then required to release the records to individuals in a form which is comprehensible. Therefore, the tribal organization's records manager must be capable of translating the information into understandable language. The individual requesting such information from the records manager under the provisions of the Privacy Act may examine the records in person or have copies of them mailed. Individuals who desire to view their records in person are entitled to take someone with them. The records manager may request that the individual requesting access to their information sign a statement which authorizes the tribal organization's records manager to disclose and discuss the record in the second person's presence.

Individuals requesting access to medical records are normally permitted to review such records directly. However, the tribal organization, if it feels that information within the medical records could have an adverse effect on the individual, may give such information to someone of the individual's choice, such as the family doctor who would be willing to review and discuss the contents of the information with the individual requesting it.

There are seven specific exemptions which the records manager may use to deny access to information contained within personal files. These specific exemptions are:

- * Classified documents concerning national defense and foreign policy
- * Investigatory material compiled for law enforcement purposes
- * Secret Service Intelligence files
- * Files used solely for statistical purposes
- * Investigatory material used in making decisions concerning federal employment, military service, federal contracts, and security clearances
- * Testing or examination material used solely for employment purposes
- * Evaluation material used in making decisions regarding promotions in the armed services

Besides the specific exemptions which apply to all federal agencies and to tribal organizations funded under the provisions of P.L. 93-638, there are two general exemptions which apply only to the Central Intelligence Agency and federal law enforcement agencies. The latter would apply to files maintained by tribal law enforcement organizations contracting under the provisions of the P.L. 93-638. This general exemption permits files maintained by federal criminal law enforcement agencies to be exempted from disclosure under the Privacy Act.

The Privacy Act establishes procedures wherein the information contained within the files on an individual must be accurate, complete, relevant and up to date. Tribal organizations are not permitted, therefore, to discontinue or alter any established systems of records without the prior approval of the appropriate federal agency nor can the tribal organization deny requests for amendment of records by an individual if such individual feels that the information is inaccurate. Tribal organizations, before amending such records under an individual's request, must obtain prior approval from the appropriate federal funding agency. Tribal organizations are required to only collect such information about individual's which is relevant and necessary to accomplish purposes of the program.

In keeping with the provisions of the Privacy Act, the tribal records

manager should adopt policies which respond to each of the five points of the Privacy Act. Tribal organizations should adopt a policy which permits employees and clients of the tribal organization to examine his or her personal records. The policies statement should state the exemptions allowed from this inspection. Policies should permit client's or employee's the right to correct, ask for a deletion, or to write a statement of disagreement with any item in the file in the presence of the records manager.

Tribal organizations should establish policies which require that the tribal organization advice employees and clients of request's for information by third parties who are outside the organization. Employees and clients must be informed of such requests and must grant their consent before the release of such information concerning the employee or client to the outside third party.

All requests for information about employees or clients should be referred to the records manager. The tribal organization should establish that prior authorization of the individual concerned is required before personal data about the individual will be disclosed to the outside party. When information which is part of federally established records is requested, such information cannot be denied unless it infringes on the privacy of the individual concerned.

Consent by the individual concerned means that the individual must give permission for the tribal organization and the records manager to disclose such information. This consent must be given in writing and must identify specifically the information to be disclosed and any constraints or restrictions placed on such disclosure.

D. Administrative Provisions of Grants and Contract

Besides the provisions of the Privacy Act and the Freedom of Information Act and the provisions of those acts which are incorporated into the P.L. 93-638, all federal agencies establish administrative provisions concerning records management which are incorporated into the terms and conditions of each grant and contract award. These administrative provisions establish requirements which deal with retention of certain records and with the examination of such records by duly authorized federal officials.

Tribal organizations are required to maintain records of program performance and financial activities which are sufficient to properly disclose all costs and activities performed by the organization. Records must be retained for a period of three (3) years from the date of filing for final payment of the program. If, however, the tribal organization is involved in any litigation, claim, or audit findings concerning the program, the records must be held open until such claims have been resolved.

The three year retention period begins from the date of submission of the final expenditure report. If the tribal organization receives a multi-year program the three year period begins from the date of submission of each annual financial report.

Tribal organizations are authorized to substitute microfilm and microfiche copies of the original records.

Records of nonexpendable property which are obtained by the tribal organization with federal funds are required to be retained for a period of three (3) years after the final disposition of the nonexpendable property. If the property is held by the tribe for several years after the end of the program and is finally declared scrap, the records must be held for a period of three years after the declaration of the property as being scrap.

The second administrative provision contained in most grants and contracts is the provision which requires that the tribal organization agree to make available at all reasonable times any of the program records for the inspection, audit, or reproduction by any authorized representative of the Comptroller General, the funding agency, or the grants or contracts officer. The tribal organization's records manager must realize that any duly authorized representative of the federal funding agency has the right to request access at all reasonable times at the expiration of the retention period to any records held by the records manager. The federal funding agency can examine such records and reproduce such records. Record managers who are charged with the responsibility for a long term retention of tribal records should therefore be aware that occasionally federal funding agencies may request access to such records for examination or audit purposes.

Besides the general administrative provisions above concerning the retention and examination of records, records managers may also have special administrative provisions imposed by specific grants or contracts. Records managers, therefore, should periodically examine the terms and conditions of the grants and contract awarded to the tribal organization to determine if provisions imposing special records management requirements have been implemented by the funding agency over and above those of retention and examination.