***Health Information Management***

***Office of Informatics and Analytics***

**Fact Sheet**

**VHA Requirements for Records Storage**

**BACKGROUND**

Veterans Administration Medical Centers (VAMCs), Program Offices, and Veterans Integrated Service Networks (VISNs)are required to maintain and store many different types of VA records. The VAMC Records Manager is responsible for meeting the records storage requirements for all facility-generated records. These records may include but are not limited to: patient and employee health records, financial records, facility drawings, and research protocol records. Records can be further subdivided into categories: active or inactive and temporary or permanent. This Fact Sheet explains the requirements for VHA records storage. Additional information on records may be found in VHA Records Control Schedule (RCS) 10-1 or the National Archives and Records Administration (NARA) General Records Schedule (GRS).

**GUIDANCE**

The requirements for records storage are determined by the National Archives and Records Administration (NARA) in [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36). Due to the technical nature of 36 CFR 1234, if further clarification is needed, it is suggested that VAMC Records Managers refer vendors, facility engineering and safety managers to the NARA standards.

VHA records storage can be divided into 6 categories:

1. Inactive records, off-site storage

2. Inactive records, on-site storage

3. Active records, off-site storage

4. Active records (low-usage), on-site storage

5. Active records (high-usage), on-site storage

6. temporary/transit records storage

**1. INACTIVE RECORDS, OFF-SITE STORAGE:** These are records that are no longer required for their original purpose such as patient care or a business need but cannot be destroyed due to the requirements of VHA RCS (RCS) 10-1 or GRS. These records are normally stored at an off-site facility in one of three places: Department of Veterans Affairs Records Center & Vault (RC&V) located in Neosho, Missouri; National Archives & Records Administration (NARA) Federal Records Centers (FRC); and/or commercial off-site records storage a center that meets the records storage standards. (Examples of these records are closed inactive health records, financial records, and long-term temporary records that have not aged out.)

* For the VA Records Center and Vault User’s Guide see <https://vaww.rrs.aac.va.gov/>.
* For NARA Federal Records Centers see <http://www.archives.gov/frc/>.
* For commercial off-site storage facilities an agency must provide documentation to NARA that the [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36) records storage standards are met. Required documentation consists of:

 1. A completed 36 CFR 1234 inspection checklist

 2. A report under seal of a licensed fire protection engineer that the facility complies with the

 standards

 3. A personal statement from the facility Records Manager certifying that the facility under

 consideration is [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36) compliant

The facility Records Manager shall request that a representative of the commercial facility being considered complete the inspection checklist and ask for a fire engineer’s report that speaks to the points noted in [1234.32(3)](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36#se36.3.1234_132). The documents should be sent by the vendor to the facility Records Manager who subsequently sends them to NARA. The personal statement can be in the e-mail message block that also transmits the checklist and fire engineer’s report to NARA. [See File 3 of NARA’s online [Records Storage Facility Standards Toolkit](http://www.archives.gov/records-mgmt/storage-standards-toolkit/)]

**REQUIREMENT:** Annually the facility Records Manager will ensure that a commercial records storage facility continues to meet the [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36) requirements by conducting a site visit to determine if any change to where the records are stored has occurred since the last visit. Examples include a change to the structure, any change to the climate control or fire suppression systems, or if additional storage space was added to the building. The Temporary Records Storage Basic Checklist (Attachment A) can be utilized for documentation of monitoring of the basic requirements for commercial off-site records storage. Additionally, the Records Manager and/or service line/program office is required to maintain a finding aid to locate and retrieve all inactive records in off-site records storage facilities (RC&V, NARA facilities, or a commercial facility). Examples of finding aids include box inventory listings maintained by accession number and transfer of health records utilizing the VistA Record Tracker software.

**NOTE:**  The NARA web-site outlines the required documents for obtaining permission to use Commercial off-site storage. The request package will be sent to the VHA Records Management Program Office, Health Information Management, Health Information Governance (10P2C) for routing through the VA Records Management Office to NARA.

Department of Veterans Affairs

Health Information Governance (10P2C) Health Information Management

Attn: VHA Records Officer

810 Vermont Avenue NW

Washington, DC 20420

**2. INACTIVE RECORDS, ON-SITE STORAGE:**  The primary difference between inactive records stored off-site versus on-site is the location of the storage facility. Storing inactive records on-site is not recommended. Such areas are typically called records staging or holding areas. These areas are traditionally at the highest risk of loss due to the fact that these records are not in active use and often times are not being monitored. These records can be exposed to environmental changes, pests (insects) and vermin (mice, rats, and other rodents) for a prolonged period of time before being discovered. [See File 4 of NARA’s online [Records Storage Facility Standards Toolkit](http://www.archives.gov/records-mgmt/storage-standards-toolkit/).]

**REQUIREMENT:**  If the VAMCs, program offices, and VISNs store inactive records on-site, the area must meet the requirements of [36 CFR 1234.10, .12 and .14](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36#sp36.3.1234.b) as appropriate. Inactive records maintained in on-site storage shall continue to be listed on the facility master, as well as service-line/program office records inventory and file plans. The Temporary Records Storage Basic Checklist (Attachment A) can be utilized for documentation of monitoring of on-site records storage.

**NOTE:** It is highly recommended that VAMCs, program offices and VISNs utilize either the Department of Veterans Affairs Records Center & Vault (RC&V) or NARA Federal Records Centers (FRCs) for storing inactive records off-site.

**3. ACTIVE RECORDS, OFF-SITE STORAGE:** There are times when it makes financial sense to store active records in off-site storage. The VA Records Center & Vault (RC&V) in Neosho, Missouri does not accept active records. NARA Federal Records Centers (FRC) and commercial records centers will accept active records. Storing active records can become costly if the records must be pulled back to the VHA facility on a regular basis and then returned to the storage facility. Considerations: (1) how often are the records needed at the VHA facility; (2) are the records affected by a current records hold/freeze; (3) how difficult is the process to return the records to the facility; (4) distance to the facility; (5) necessity to purge inactive records and ship to long-term storage, etc.

**REQUIREMENT:** If active records are stored off-site in a NARA Federal Records Center (FRC) or a commercial records center, these facilities must meet the [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36) requirements. If a commercial records center is utilized, the facility Records Manager must provide documentation to NARA that the [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36) records storage standards are met. The required documentation includes:

1. A completed 36 CFR 1234 inspection checklist

2. A report under seal of a licensed fire protection engineer that the facility complies with the standards

3. A personal statement from the facility Records Manager certifying that the facility under consideration is 36 CFR 1234 compliant

The Records Manager shall request that a representative of the commercial facility being considered complete the inspection checklist and ask for a fire engineer’s report that speaks to the points noted in [1234.32(3)](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36#se36.3.1234_132). The materials shall be sent by the vendor to the facility Records Manager who subsequently sends the materials to NARA. The personal statement can be in the e-mail message block that also transmits the checklist and fire engineer’s report to NARA. [See File 3 of NARA’s online [Records Storage Facility Standards Toolkit](http://www.archives.gov/records-mgmt/storage-standards-toolkit/).]

Annually the facility Records Manager will ensure that a commercial records storage facility continues to meet the [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36) requirements by conducting a site visit to determine if any change to where the records are stored has occurred since the last visit. Examples include a change to the structure, any change to the climate control or fire suppression systems, or if additional storage space was added to the building. The Temporary Records Storage Basic Checklist (Attachment A) can be utilized for documentation of monitoring of the basic requirements for commercial off-site records storage. Active records stored at either a NARA FRC or a commercial facility shall continue to be listed on the facility master, as well as service line/program office records inventory and file plan.

**4. ACTIVE RECORDS (LOW-USAGE), ON-SITE STORAGE:**  These are active records stored in locations with the sole purpose of storing records. These areas are un-manned with limited employee access. These records are normally located outside the view of employees to ensure security and safety of the records. These records can include such records as research protocol records or financial records, which are long term temporary records. Low-use, active records maintained in on-site storage are traditionally at a high risk of loss due to lack of oversight and control of the records. These records can be exposed to environmental changes, as well as pests (insects) and vermin (mice, rats, and other rodents) for a prolonged amount of time prior to being discovered.

**REQUREMENT:**  Records storage spaces shall have security devices such as locks and alarm systems to limit access to authorized personnel only. The storage area should have sprinklers for fire protection. It is not a requirement that a facility-based file room or office space meet the requirements of [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36).10, 12 and 14; however the space shall meet the requirements of:

 § 1234.10, a 1 & 2, c, e, f, h, l, m

 § 1234.12, a, l, m,

 § 1234.14, a, b, c, d

The facility/program office Records Manager is required to monitor active records in all low-use on-site storage spaces at least once a week and be able to provide documentation of weekly checks for compliance. The Temporary Records Storage Basic Checklist (Attachment A) can be utilized for documentation of monitoring of on-site records storage.

**NOTE:** Active records (low usage) shall not be stored on-site in the following locations:

* Basement mechanical rooms with steam pipes, sewer lines or water pipes
* Out-buildings or buildings and rooms with no environmental controls (HVAC systems)
* A flood plain or below sea level (if the facility is below sea level or on a flood plain, ensure that records are stored on a higher floor)

**5. ACTIVE RECORDS (HIGH-USAGE), ON-SITE STORAGE:** These are records commonly located in central file rooms for health and radiological records or in office space in filing cabinets.

REQUIREMENT: Records storage spaces shall have security devices such as locks and alarm systems to limit access to authorized personnel only. The storage area should have sprinklers for fire protection. It is not a requirement that a facility-based active file room or office space meet the requirements of [36 CFR 1234](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=237727c71e44d5bb3dd3efd2a61c0fb4&rgn=div5&view=text&node=36:3.0.10.2.23&idno=36).10, 12 and 14; however the space shall meet the requirements of:

 § 1234.10, a 1 & 2, c, e, f, h, l, m

 § 1234.12, a, l, m,

 § 1234.14, a, b, c, d

**NOTE:** The Temporary Records Storage Basic Checklist (Attachment A) can be utilized for documentation of monitoring of on-site records storage. Active records (high-usage) shall not be stored on-site in the following locations:

* Basement mechanical rooms with steam pipes, sewer lines or water pipes
* Out-buildings or buildings and rooms with no environmental controls (HVAC systems)
* A flood plain or below sea level (if the facility is below sea level or on a flood plain, ensure that records are stored on a higher floor)
* On pallets on dirt floors.

**6. TEMPORARY/TRANSIT RECORDS STORAGE:** These are locations where records are placed while being processed for transfer and/or waiting to be transferred to off-site storage to one of three places: Department of Veterans Affair Record Center & Vault (RC&V) Neosho, Missouri; NARA Federal Records Centers (FRC); or a commercial records storage center. The purpose of these temporary locations is to have space to process these records, not for long-term records storage.

**REQUIREMENT:** Records shall not be maintained in a temporary/transit records storage area for more than 90 days. A temporary/transit records storage area should be within the facility, not on loading docks, out-buildings, basements with steam pipes or any other environmental hazard that can harm the records being stored. The Temporary Records Storage Basic Checklist (Attachment A) can be utilized for documentation of monitoring of on-site records storage in temporary/transit records storage areas.

**NOTE:**  Privacy requirements still apply to all records with Personal Identifiable Information (PII) and Personal Health Information (PHI) in addition to the NARA requirements found in this Fact Sheet. This especially applies to access limitations like locks and alarm systems.

**RETRIEVAL OF INACTIVE RECORDS FROM RC&V OR NARA FRCs:** Previously retired records retrieved from either the RC&V or a NARA FRC for ROI, litigation purposes, etc. shall be returned to the storage facility for interfiling with the same accession they were retired in as soon as possible. Records retrieved for litigation or records freeze may have to be maintained long-term at the facility, however once the litigation hold or freeze is lifted, the records shall be returned for interfiling within the same accession they were retired in.

**REQUIREMENT:** Records Managers (or designees) shall develop a process to track records retrieved from either the RC&V or a NARA FRC in order to ensure the records are returned for interfiling. The VHA Records Officer receives notification from the storage facilities of any VHA records which are retrieved by facilities or program offices and maintained for longer than 90 days.

**REFERENCES**

* VA Handbook 6300.1, Records Management Procedures
* VA Handbook 6300.2, Procedures for the Vital Records Program
* VA Handbook 6300.8 Procedures for Shipment of Records to the Department of Veterans Affairs (VA) Records Center & Vault in Neosho, Missouri
* VHA Directive 6300, Records Management
* VHA Records Control Schedule (RCS) 10-1
* VA Records Center & Vault Users’ Guide: <https://vaww.rrs.aac.va.gov/>
* NARA Records Storage Toolkit: <http://www.archives.gov/records-mgmt/storage-standards-toolkit/>

**Prepared by:**

VHA HIM Records Management Office

**ATTACHMENT A:**

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| --- |
| **TEMPORARY RECORDS STORAGE BASIC CHECKLIST** (See 36 CFR 1234 for Full Requirements)***Complete one checklist for each on-site & commercial off-site location*** |
| **Date Inspected:**  | **Service/Office Storing Records:** |
| **Storage Inspected by RM / Liaison (Names):**  | **Point of Contact (Name/Phone #):**  |
| **Facility On-Site Storage:** [ ]  Yes [ ]  No*\*\*Note: Facility On-site storage includes garages, warehouses, storage rooms, basements, sheds, etc.* | **Site/Location:****Bldg #:****Room #:** **Box Count:**  |
| **Commercial Off-Site Storage:** [ ]  Yes [ ]  No*\*\* Note: NARA Federal Records Centers & the VHA Records Center & Vault (RC&V) are not categorized as commercial off-site storage facilities.*  | **Facility Name:****Address:** **Date of RM / Liaison Site Visit:** **Box Count:**  |
| **For Commercial Off-Site Records Storage** |
| 1. Does the commercial off-site storage facility meet 36 CFR 1234 records storage standards? [ ]  Yes [ ]  No |
| 2. Records Manager maintains copies of documentation indicating the storage facility meets 36 CFR 1234 Subpart B  (i.e. 36 CFR 1234 checklist)? [ ]  Yes [ ]  No |
| 3. NARA Approval Memo Maintained by Records Manager: [ ]  Yes [ ]  No Date of NARA Memo/Email:  |
| 4. Records Manager coordinates the storage/disposition of records with the commercial facility? [ ]  Yes [ ] No |
| 5. Records Manager maintains a detailed inventory of boxed records stored at the commercial facility? [ ]  Yes [ ] No |
| 6. Do records stored at the commercial facility contain PHI/PII? [ ]  Yes [ ] NoIf Yes, have the Records Manager and Privacy Officer coordinated with theContracting Officer to ensure a Business Associate Agreement is in place? [ ]  Yes [ ] No |
| **Link to NARA Toolkit for Records Stored in a Commercial Records Storage Facility:** <http://www.archives.gov/records-mgmt/storage-standards-toolkit/file3.html> |
| **For Facility On-Site & Commercial Off-Site Records Storage** |
| **RECORD MAINTENANCE REQUIREMENTS:** Approved Records Boxes Utilized? [ ]  Yes [ ]  NoVA Form 7468 on Boxes? [ ]  Yes [ ]  NoRecords Off the Floor? [ ]  Yes [ ]  NoOrganized, Readable, Properly Packed and Retrievable Boxes? [ ]  Yes [ ]  NoEvidence of Mold? [ ]  Yes [ ]  NoEvidence of Water Damage? [ ]  Yes [ ]  No Are records comingled with Non-Records? [ ]  Yes [ ]  No | Records listed on Inventory/File Plan? [ ]  Yes [ ]  NoRecords maintained per RCS 10-1/GRS? [ ]  Yes [ ]  No\*\* If records are maintained longer than schedules allow, state reason (i.e. records freeze, litigation hold, etc): |
| **FACILITY/ENVIRONMENTAL REQUIREMENTS** Limited Access: [ ]  Yes [ ]  NoFloor Load Limit Sign: [ ]  Yes [ ]  NoFloor-to-Ceiling Walls: [ ]  Yes [ ]  NoWater/Sewer Pipes: [ ]  Yes [ ]  NoWater Leaks: [ ]  Yes [ ]  NoEvidence of Pests: [ ]  Yes [ ]  No | Relative Humidity < 70% [ ]  Yes [ ]  NoExtreme Heat: [ ]  Yes [ ]  NoClimate Controlled: [ ]  Yes [ ]  NoFire Suppression: [ ]  Yes [ ]  NoOutside 100 yr. Flood Plain: [ ]  Yes [ ]  No |
| **OVERALL FINDINGS:** [ ]   **Compliant**[ ]  **Noncompliant - Report to Executive Leadership**  *(If there are noncompliant findings, list remediation actions below and when they have been corrected)* |
| **Notes:**  |