

CMS Manual System	Department of Health & Human Services (DHHS)
Pub 100-01 Medicare General Information, Eligibility, and Entitlement	Centers for Medicare & Medicaid Services (CMS)
Transmittal 13718	Date: April 10, 2026
	Change Request 14324

SUBJECT: Records and Information Management Requirements Updates to Pub. 100-01, Medicare General Information, Eligibility and Entitlement Manual, Chapter 7, Section 30

I. SUMMARY OF CHANGES: The purpose of this Change Request (CR) is to consolidate and update records and information management requirements in Pub. 100-01, Medicare General Information, Eligibility and Entitlement Manual, Chapter 7, Section 30. Key enhancements include a comprehensive records management framework with expanded coverage of National Archives and Records Administration (NARA) compliance requirements and federal records management obligations, enhanced storage standards with updated commercial storage facility requirements and inspection protocols, new digitization requirements establishing standards for electronic records conversion with validation requirements and disposal procedures for original source records, detailed litigation hold procedures including contractor certification requirements and termination notice processes, mandatory annual reporting requirements with standardized templates and submission procedures, integration of Executive Order OMB M-23-07 transition to electronic records requirements, updated record retention schedules with revised disposition authority numbers and retention periods across multiple record categories, and enhanced security and sanitization requirements for contract completion including system documentation and government file sanitization protocols.

EFFECTIVE DATE: May 11, 2026

**Unless otherwise specified, the effective date is the date of service.*

IMPLEMENTATION DATE: September 14, 2026

Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual is not updated)

R=REVISED, N=NEW, D=DELETED-*Only One Per Row.*

R/N/D	CHAPTER / SECTION / SUBSECTION / TITLE
R	7/30 - Files Maintenance
R	7/30.10 - Files Maintenance Program - General
R	7/30.10.1 - Description of Records Maintained
R	7/30.10.2 - Definition of a Record
R	7/30.20 - Implementing a Files Management Program
N	7/30.20.1 - Types of Record Schedules
N	7/30.20.2 - CMS Record Control Schedule
R	7/30.30 - Record Retention and Disposal Schedule
R	7/30.30.1 - Disposition Instructions - Destruction of Records
D	7/30.30.1.1 - Disposition Instructions When Operating Under a Freeze
D	7/30.30.1.2 - Disposition Instructions When Medicare Records are Microfilmed
D	7/30.30.1.3 - Disposition for Paper-Only Medicare Records
D	7/30.30.1.4 - Disposition for Medicare Records that are Imaged/Scanned
D	7/30.30.1.5 - Disposition for Medicare Records When Potential Fraud or Overutilization has been Identified
R	7/30.30.2 - Description of Records
N	7/30.30.3 - Records Dispositioning Process
R	7/30.40 - Retention of Claims File Materials
R	7/30.40.1 - Segment File Accumulation Period
D	7/30.40.2 - Standard Retention Periods - Microfilmed Claims
D	7/30.40.3 - Retention Period Microfilmed Material
R	7/30.50 - Microfilming of Files Material
R	7/30.50.1 - Microfilming Procedures
R	7/30.50.2 - Microfilming Index Label
R	7/30.50.3 - Retention and Destruction of Microfilm
N	7/30.50.4 - Notification

R/N/D	CHAPTER / SECTION / SUBSECTION / TITLE
N	7/30.50.5 - Contractor Responsibility upon Physical Completion of the Contract
N	7/30.50.6 - Records Management and Retention
R	7/30.60 - Annual Report of Medicare Records
N	7/30.60.1 - CMS Contractor Litigation Hold Certification Requirements
N	7/30.60.2 - Litigation Hold Termination Notice
R	7/30.70 - Disposition of Non-Claims Materials
N	7/30.70.1 - Digitization Standards
N	7/30.70.2 - Validation Requirements
N	7/30.70.3 - Disposal of Original Source Records
R	7/30.80 - Standards for All Records Storage Facilities
N	7/30.80.1 - Commercial Storage Facilities
N	7/30.80.2 - Standards for All Record Storage Facilities
N	7/30.80.3 - Transfer of Federal Records stored in Commercial Facilities
N	7/30.80.4 - Commercial Storage Facilities Inspections
R	7/30.90 - Exhibits
N	7/30.90.1 - Annual Report on Medicare Records Requirements
N	7/30.100 - Exhibits
N	7/30.100.1 Exhibit A CMS Contractor Litigation Hold Certification & Information Form.
D	7/30.100.2 Exhibit B. CMS-Certified and NARA-Approved Commercial Storage Facilities
D	7/Exhibit 1 - Preprinted Container Label
D	Exhibit 2 - Minimum Label Data Required for Unlabeled Boxes
D	Exhibit 3 - Records Transmittal and Receipt - Standard Form 135
D	Exhibit 4 - Reference Request - Federal Records Center - Optional Form 11
D	Exhibit 5 - Certificate of Authenticity - START

R/N/D	CHAPTER / SECTION / SUBSECTION / TITLE
D	Exhibit 6 - Certificate of Authenticity - END
D	Exhibit 7 - Correction Card
D	Exhibit 8 - Start of Retake or Addition Certificate
D	Exhibit 9 - Retake or Addition Certificate
D	Exhibit 10 - Resolution Test Chart
D	Exhibit 11 - Witness Disposal Certification (Sample)
D	Exhibit 12 - Roll Report Exhibit 13 - Report of Medicare Records Exhibit 14 - Inspection Checklist--Standards for Records Storage Facilities
D	Exhibit 13 - Report of Medicare Records
D	Exhibit 14 - Inspection Checklist--Standards for Records Storage Facilities

III. FUNDING:

For Medicare Administrative Contractors (MACs):

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

IV. ATTACHMENTS:

Business Requirements

Manual Instruction

Attachment - Business Requirements

Pub. 100-01	Transmittal: 13718	Date: April 10, 2026	Change Request: 14324
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II. GENERAL INFORMATION

A. Background: This information was consolidated for Medicare General Information, Eligibility and Entitlement Manual Pub 100-01, Section 30, Chapter 7 of the IOM. The updated Medicare General Information, Eligibility and Entitlement Manual Pub 100-01, Chapter 7, Section 30 has eliminated several outdated and obsolete provisions that previously required Medicare Administrative Contractors (MACs) to indefinitely preserve certain record categories regardless of age. The removed provisions included blanket preservation requirements for Medicare provider cost report records and related documentation (Forms CMS-2552, CMS-2540, CMS-1728, CMS-265, CMS-1984, CMS-222, CMS-2088, and CMS-224), provider enrollment and revalidation records (Forms CMS-855A, CMS-855B, CMS-855I, CMS-855R, CMS-855O, CMS-855S, CMS-855POH, CMS-21034, and CMS-588), institutional provider agreements and related survey documentation, and Local Coverage Determination development and stakeholder review materials. These indefinite retention requirements have been replaced with structured disposition schedules that align with current NARA-approved retention periods and federal records management standards, allowing for proper records lifecycle management while

maintaining appropriate preservation periods based on administrative, legal, and regulatory requirements. The updated manual now incorporates comprehensive records management frameworks that balance operational efficiency with compliance obligations, eliminating the previous "regardless of age" provisions that created unnecessary storage burdens and conflicted with established federal records disposition authorities.

The Medicare Administrative Contractor (MAC) shall exercise reasonable judgment and care in the management and disposition of Medicare records in accordance with established retention schedules and legal preservation requirements. The MAC may authorize destruction only after confirming that the applicable retention period per the records schedule has been satisfied and that no litigation hold or other legal preservation requirement applies to the specific records.

B. Policy: Medicare Administrative Contractor must operate under the comprehensive records and information management framework established by the National Archives and Records Administration (NARA) and maintain strict compliance with federal records management standards throughout your entire contract lifecycle. Contractors are required to implement Executive Order OMB M-23-07 for transition to electronic records, establish systematic documentation standards, and maintain Information Security Protocols while protecting personally identifiable information (PII) and protected health information (PHI) in all records management activities. Contractor responsibilities include following structured record schedules with specific disposition authority numbers and retention periods across multiple categories, implementing proper digitization standards with validation requirements, and adhering to comprehensive litigation hold obligations that require you to preserve responsive information in accordance with Federal Rules of Civil Procedure while maintaining strict confidentiality of litigation hold communications. Contractors must ensure commercial storage facilities meet enhanced standards with mandatory inspection protocols, submit annual Medicare records reports using standardized CMS templates at the beginning of each calendar year, and upon contract completion, provide comprehensive system documentation, sanitize all government files in accordance with NIST SP 800-88 guidelines, return all government IT resources, and certify that all government information has been properly purged from contractor-owned systems within specified timeframes to protect sensitive government information while facilitating operational continuity. No additional funding will be provided for this activity.

III. BUSINESS REQUIREMENTS TABLE

"Shall" denotes a mandatory requirement, and "should" denotes an optional requirement.

Number	Requirement	Responsibility								
		A/B MAC			DME MAC	Shared-System Maintainers				Other
		A	B	HHH		FISS	MCS	VMS	CWF	
14324.1	Contractors shall ensure their records and Information management program complies with the instructions found in Pub 100-1—Medicare General Information, Eligibility and Entitlement, Chapter 7-Contract Administrative Requirements, Section 30-Records and Information Management Requirements and Responsibilities.	X	X	X	X					
14324.2	Contractors shall ensure their records and information management program complies with the instructions found in Pub 100-1—Medicare General Information, Eligibility and Entitlement, Chapter 7-Contract Administrative Requirements, Section 30.40 - National Archives and Records Administration (NARA) Universal Electronic Records	X	X	X	X					

Number	Requirement	Responsibility								
		A/B MAC			DME MAC	Shared-System Maintainers				Other
		A	B	HHH		FISS	MCS	VMS	CWF	
	Management (UERM) Requirements.									
14324.3	Contractors shall ensure their records and information management program complies with the instructions found in Pub 100-1—Medicare General Information, Eligibility and Entitlement, Chapter 7-Contract Administrative Requirements, Section 30.50 - Contract Initiation and Expiration.	X	X	X	X					
14324.4	Contractors shall ensure their records and information management program complies with the instructions found in Pub 100-1—Medicare General Information, Eligibility and Entitlement, Chapter 7-Contract Administrative Requirements, Section 30.60 - Litigation Hold Obligations.	X	X	X	X					

Number	Requirement	Responsibility								
		A/B MAC			DME MAC	Shared-System Maintainers				Other
		A	B	HHH		FISS	MCS	VMS	CWF	
14324.5	Contractors shall ensure their records and information management program complies with the instructions found in Pub 100-1— Medicare General Information, Eligibility and Entitlement, Chapter 7-Contract Administrative Requirements, Section 30.70 - Digitization Requirements.	X	X	X	X					
14324.6	Contractors shall ensure their records and information management program complies with the instructions found in Pub 100-1—Medicare General Information, Eligibility and Entitlement, Chapter 7-Contract Administrative Requirements, Section 30.80 - Record Storage.	X	X	X	X					
14324.7	Contractors shall ensure their records and information management program complies	X	X	X	X					

Number	Requirement	Responsibility								
		A/B MAC			DME MAC	Shared-System Maintainers				Other
		A	B	HHH		FISS	MCS	VMS	CWF	
	with the instructions found in Pub 100-1—Medicare General Information, Eligibility and Entitlement, Chapter 7-Contract Administrative Requirements, Section 30.90 - Annual Reporting.									

IV. PROVIDER EDUCATION

None

Impacted Contractors: None

V. SUPPORTING INFORMATION

Section A: Recommendations and supporting information associated with listed requirements: N/A

"Should" denotes a recommendation.

X-Ref Requirement Number	Recommendations or other supporting information:

Section B: All other recommendations and supporting information: N/A

VI. CONTACTS

Post-Implementation Contact(s): Contact your Contracting Officer's Representative (COR).

VII. FUNDING

Section A: For Medicare Administrative Contractors (MACs):

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

ATTACHMENTS: 3

General Information, Eligibility, and Entitlement Manual
Chapter 7 - Contract Administrative Requirements

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(Rev. 13718; Issued: 04-10-26)

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 - 30.100 - Exhibits*
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 - Exhibit B - Annual Report Template*

30 - Records and Information Management Requirements and Responsibilities (Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

CMS operates under the comprehensive records management framework established by the National Archives and Records Administration (NARA). This framework includes compliance with, but not limited to, The Federal Records Act (44 U.S.C. 21, 29, 31, and 33); NARA regulations outlined in 36 Code of Federal Regulations (CFR) Chapter XII Subchapter B; Privacy Act of 1974 safeguarding policies (5 U.S.C. 552a) for protecting Federal records. Under the health insurance program, CMS bears the responsibility for developing and implementing comprehensive standards for records and information management (RIM) programs. This responsibility specifically includes key requirements to establish effective controls over record creation processes, ensure records contain adequate and proper documentation of contractor administration and operations, and to mandate that each contractor establish and maintain an active RIM program.

Program Objectives: *The RIM program shall provide economical and efficient management of records as specified in §30.10 of this manual, ensuring both compliance with federal standards and operational effectiveness.*

Federal record means “...all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.” (See 44 U.S.C. §3301).

(1) The term Federal record—

- (i) Includes HHS/CMS records.*
- (ii) Does not include personal materials.*
- (iii) Applies to records created, received, or maintained on behalf of HHS/CMS by contractors pursuant to their contract; and*
- (iv) May include deliverables and documentation associated with deliverables.*

(2) Recorded information means all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form. (See 44 U.S.C. 3301).

(3) Personal materials mean documentary materials belonging to an individual that are not used to conduct agency business. Personal files are excluded from the definition of Federal records and are not owned by the Government. (See 36 CFR 1220.18).

30.10 - Records and Information Management Program

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

In accordance with the Code of Federal Regulations and 44 U.S.C. Chapter 31 § 3102 (Establishment of program of management), CMS bears the responsibility for establishing and maintaining an active, ongoing program that ensures economical and efficient management of agency records. This responsibility specifically requires CMS to implement effective controls over the creation, maintenance, use, and disposition of records throughout current business operations, while ensuring adequate and proper documentation of contractor administration and operations. Additionally, each contractor shall establish and maintain their own active and continuous program for economic and efficient records management as specified in §30 of this manual. The program shall include, but is not limited to:

- *Effective controls over the creation, maintenance, and use of records in the conduct of current business.*
 - *In accordance with 44 U.S.C. § 3102 and 36 CFR § 1220.34, establish comprehensive controls over record lifecycle management throughout business operations*
 - *Implement standardized procedures for record creation, classification, and ongoing maintenance in accordance with NARA regulations at 36 CFR Chapter XII Subchapter B*
 - *Ensure proper documentation of contractor administration and operational activities in accordance with the Federal Records Act (44 U.S.C. 21, 29, 31, and 33)*
- *Procedures for identifying records of general interest or use to the public that are appropriate for public disclosure, and for posting such records in a publicly accessible electronic format.*
 - *In accordance with 5 CFR § 552 (Freedom of Information Act) requirements and Executive Order 13392 on improving agency disclosure of information, develop systematic procedures for identifying records suitable for public disclosure*
 - *In accordance with 5 U.S.C. § 552(a)(2) and open government transparency mandates, establish protocols for posting such records in publicly accessible electronic formats*
 - *Maintain balance between transparency obligations and protection of sensitive information as defined by FOIA exemptions in accordance with 5 U.S.C. § 552(b)*
- *Cooperation with CMS in applying standards, procedures, and techniques designed to improve the management of records and information, promote the maintenance and security of records deemed appropriate for preservation, and facilitate the segregation and disposal of records of temporary value; and*
 - *In accordance with 44 U.S.C. § 2904 and 36 CFR § 1220.18, provide full cooperation with CMS in implementing records management standards and procedures*
 - *In accordance with 36 CFR § 1236.10, actively promote maintenance and security of records designated for preservation*

- *In accordance with NARA-approved disposition schedules and 36 CFR § 1226, facilitate proper segregation and disposal of temporary records according to approved retention schedules*
- *Compliance with sections § 30.10 – 30.100 of this manual.*
 - *In accordance with the Federal Records Act (44 U.S.C. § 21, 29, 31, and 33), ensure complete adherence to all provisions outlined in sections § 30.10 – 30.100 of this manual.*
 - *In accordance with NARA regulations outlined in 36 CFR Chapter XII Subchapter B, maintain compliance with federal records management laws*
 - *In accordance with the Privacy Act of 1974 (5 U.S.C. § 552a) and 5 CFR § 552 (FOIA requirements), integrate compliance requirements into all records management processes to support open government transparency initiatives*

These requirements align with the comprehensive records management framework established by NARA and support CMS's responsibility for developing effective Records and Information Management (RIM) programs under the health insurance program, while ensuring full compliance with federal disclosure requirements and open transparency standards.

Records identified by CMS as pertaining to current or potential investigations, litigation, or administrative actions, whether by the Office of Inspector General (OIG), Department of Justice (DOJ), or any other relevant federal body, may not be destroyed or altered in accordance with the Federal Records Act (44 U.S.C. Chapter 31) and applicable litigation hold requirements under Federal Rule of Civil Procedure 37(e). This includes but is not limited to: records related to ongoing Workers' Compensation claims, Medicare Secondary Payer (MSP) set-aside arrangements, or those suspected of fraud, waste, abuse, or overutilization of services. These records shall be retained in accordance with litigation hold requirements and shall not be disposed of without explicit, written authorization from CMS, as failure to preserve relevant records may result in sanctions under Federal Rules of Civil Procedure Rule 37(e) and potential additional penalties under 18 U.S.C. § 1519 (obstruction of justice through destruction of records in federal investigations).

Contractors shall ensure compliance with applicable federal records management requirements, including electronic records standards, metadata integrity, secure storage, access controls, and CMS-specific retention schedules and disposition authorities.

30.10.1 - Executive Order M-23-07 Transition to Electronic Records

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

Subject to the provisions of Executive Order M-23-07 Transition to Electronic Records, issued by the Office of Management and Budget (OMB) and NARA, CMS, and thereby all contractors, shall maintain a robust records management program that complies with the Federal Records Act (44 U.S.C. Chapters 21, 29, 31, and 33) and its regulations codified in 36 CFR Chapter XII Subchapter B. For purposes of this requirement, robust means a comprehensive, resilient, and fully functional records management process or system that incorporates adequate controls, security

measures, and operational procedures capable of handling the complete lifecycle of federal records while maintaining compliance with all applicable federal laws and regulations:

CMS contractors are required to establish and maintain an active and continuing program for the economical and efficient management of the records outlined in §30.10 of this manual, in accordance with 44 U.S.C. § 3102 (Establishment of program of management) and 36 CFR § 1220.34 (Agency records management program requirements). For purposes of this requirement, cost effective means implementing records management practices that achieve maximum operational efficiency and regulatory compliance while minimizing unnecessary expenditures, utilizing appropriate technology solutions, and optimizing resource allocation to ensure sustainable long-term records management operations.

The contractor's programs shall ensure that agency records are properly retained, stored, and destroyed according to their disposition schedules. This includes but is not limited to:

- Ensure that all Federal records are created, retained, and managed in electronic formats, with appropriate metadata.*
- All permanent records shall be managed electronically, to the fullest extent possible, for eventual transfer and accession by NARA in an electronic format. This does not apply to permanent records accessioned into NARA or transferred for storage into Federal Records Centers before June 30, 2024. After June 30, 2024, CMS will transfer permanent records to NARA in electronic formats and with appropriate metadata, in accordance with NARA regulations and transfer guidance.*
- All temporary records in Federal agencies will be managed electronically, to the fullest extent possible through the record's disposition.*
- Temporary, analog records that become eligible for transfer after June 30, 2024, shall be transferred to commercial storage facilities that meet NARA records storage requirements as specified in 36 CFR Part 1234. NARA will no longer accept transfers of permanent or temporary records in analog formats and will accept records only in electronic format and with appropriate metadata¹.*
- Digitization of temporary analog records shall be made in accordance with NARA regulations and guidance, including metadata requirements².*

The contractor shall ensure the ongoing evaluation, enhancement, and compliance of record classification and indexing systems to align with existing laws, regulations, or government-wide policies, including but not limited to 36 CFR Part 1236 and guidance from NARA. The contractor shall maintain records in an economic, secure, and efficient manner that ensures accessibility, integrity, and reliability for agency operations and oversight.

30.10.2 - Records Management Obligations

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

A. Applicability¹

This clause applies to all Contractors whose employees create, work with, or otherwise handle Federal records regardless of the medium in which the record exists.

B. Requirements

- 1. Contractor shall comply with all applicable records management laws and regulations, as well as NARA records policies, including but not limited to the Federal Records Act (44 U.S.C. Chapters. 21, 29, 31, 33), NARA regulations at 36 CFR Chapter XII Subchapter B, and those policies associated with the safeguarding of records covered by the Privacy Act of 1974 (5 U.S.C. § 552a). These policies include the preservation of all records, regardless of form or characteristics, mode of transmission, or state of completion.*
- 2. In accordance with 36 CFR § 1222.32, all data created for Government use and delivered to, or falling under the legal control of the Government are Federal records subject to the provisions of 44 U.S.C. chapters 21, 29, 31, and 33, the Freedom of Information Act (FOIA) (5 U.S.C. § 552), as amended, and the Privacy Act of 1974 (5 U.S.C. § 552a), and shall be managed and scheduled for disposition only as permitted by statute or regulation.*
- 3. In accordance with 36 CFR § 1222.32, Contractor shall maintain all records created for Government use or created in the course of performing the contract and/or delivered to, or under the legal control of the Government and shall be managed in accordance with Federal law. Electronic records and associated metadata shall be accompanied by sufficient technical documentation to permit understanding and use of the records and data.*
- 4. CMS and its contractors are responsible for preventing the alienation or unauthorized destruction of records, including all forms of mutilation. Records may not be removed from the legal custody of CMS or destroyed except for in accordance with the provisions of the agency records schedules and with the written concurrence of the Contracting Officer and the Agency Records Officer. Willful and unlawful destruction, damage or alienation of Federal records is subject to the fines and penalties imposed by 18 U.S.C. § 2701. In the event of any unlawful or accidental removal, defacing, alteration, or destruction of records, Contractor shall report to CMS within 30 calendar days.*
- 5. The Contractor shall immediately notify the appropriate Contracting Officer upon discovery of any inadvertent or unauthorized disclosures of information, data, documentary materials, records or equipment. Disclosure of non-public information is*

¹ **NARA's metadata requirements for digitization** are comprehensively outlined in 36 CFR Subpart E (Electronic Records Management) and specifically detailed in NARA's guidance documents including "Metadata Guidance for the Transfer of Permanent Electronic Records" and related technical bulletins. For complete technical specifications and implementation guidance, refer to 36 CFR § 1236.10 through § 1236.34 and current NARA bulletins available at: <https://www.archives.gov/records-mgmt/policy/transfer-guidance.html>

limited to authorized personnel with a need-to-know as described in contracts awarded by CMS Office of Acquisition & Grants Management (OAGM). The Contractor shall ensure that the appropriate personnel, administrative, technical, and physical safeguards are established to ensure the security and confidentiality of this information, data, documentary material, records and equipment are properly protected. The Contractor shall not remove material from Government facilities or systems, or facilities or systems operated or maintained on the Government's behalf, without the express written permission of the Contracting Officer and Agency Records Officer. When information, data, documentary material, records and/or equipment is no longer required, it shall be returned to CMS control, or the Contractor shall safeguard it until otherwise directed. records returned to the Government shall be hand carried, mailed via certified mail, emailed, or securely electronically transmitted to the Contracting Officer or the Agency Records Officer. Destruction of records is expressly prohibited unless in accordance with Paragraph (4).

- 6. The Contractor (and any sub-contractor) is required to abide by Government and CMS guidance for protecting sensitive, proprietary information, classified, and controlled unclassified information.*
- 7. The Contractor shall only use Government IT equipment for purposes specifically tied to or authorized by the contract and in accordance with CMS policy.*
- 8. The Contractor shall not create or maintain any records containing any non-public CMS information that are not specifically tied to or authorized by the contract.*
- 9. The Contractor shall not retain, use, sell, or disseminate copies of any deliverable that contains information covered by the Privacy Act of 1974 or that which is generally protected from public disclosure by an exemption or exclusion to the Freedom of Information Act.*
- 10. CMS owns the rights to all data and records produced as part of all contracts. All deliverables under the contract are the property of the U.S. Government for which CMS shall have unlimited rights to use, dispose of, or disclose such data contained therein as it determines to be in the public interest. Any Contractor rights in the data or deliverables shall be identified as required by FAR 52.227-11 through FAR 52.227-20.*
- 11. Training. All Contractor employees assigned to CMS contracts who create, work with, or otherwise handle records are required to take annual CMS provided records management training. The Contractor is responsible for confirming training has been completed according to agency policies, including initial training and any annual or refresher training. All contractor employees who have access to (1) Department of Health and Human Services (HHS) Federal Information or a Federal information system or (2) personally identifiable information shall complete the CMS provided records management training required by the Department of Health and Human Services (HHS) before performing any work under their contract, and annually thereafter. The*

Contractor shall also ensure any applicable subcontractor compliance with this training requirement.

Contractor employees are expected to complete any new training requirements enacted by HHS or CMS whereby access to the course material has been provided. These courses are at no additional cost to the contract and the contractor is not required to provide documentation on such training unless specifically requested. The Government does not anticipate a contractor to develop a system specifically designed to track and monitor such trainings but will address the requirements under overall contract management and adherence to regulations as noted in the Contractor Performance Assessment Reporting System (CPARS).

Training Records. The contractor shall maintain training records for all its employees working under this contract in accordance with HHS policy.

D. Flow-down of requirements to subcontractors

- 1. The Contractor shall incorporate the substance of this clause, its terms and requirements including this paragraph, in all subcontracts awarded by CMS OAGM and require written subcontractor acknowledgment of same.*
- 2. Violation by a subcontractor of any provision set forth in this clause will be attributed to the Contractor.*

30.20 - Descriptions of Records

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

CMS Records Schedules ensure official CMS records, regardless of storage media, are preserved appropriately to satisfy legal, fiscal, regulatory, and operational requirements while providing economical and efficient records management in accordance with 44 U.S.C. § 3102 and 36 CFR § 1220.34.

30.20.1 - Types of Record Schedules

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

There are two types of records schedules, the CMS Records Control Schedule (RCS) approved by CMS and NARA, and the General Records Schedule (GRS). These schedules provide mandated instructions on the retention, transfer or destruction of records, documents, and materials. These schedules are media and classification neutral unless otherwise specified.

30.20.2 - CMS Record Control Schedule

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

Effective 2017, CMS adopted a Bucket approach to records scheduling and disposition. These records schedules identify the records accumulated by the contractor in administering the Medicare program and outline the disposal schedule for each type of record. The approved schedule provides disposition authority and instructions for program records and administrative

records not covered by the GRS. According to the disposition authority schedule for temporary records, there are conditions when records are maintained for a longer period of time. See section 30.60 " Litigation Holds".

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
<i>Buck et 2</i>	<i>Administ rative Manage ment</i>	<i>DAA- 0440- 2015- 0002- 0002</i>	<i>Non- substantiv e records that support leadershi p and/or general administr ation of all CMS programs . Includes backgrou nd files related to records in other buckets as well as records of leadershi p positions below the Administr ator and other principals .</i>	<i>Medicare Beneficiary Corresponde nce</i>	<i>Tempora ry</i>	<i>3</i>	<i>Cutoff at the end of the calendar year. Destroy no sooner than 3 years after cutoff but longer retention is authorized .</i>

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
<i>Bucket 3</i>	<i>Financial Records (Programmatic)</i>	<i>DAA-0440-2015-0004-0001</i>	<i>Financial Records (non-GRS), regardless of CMS Program. Includes Medicare Part A, Part B, Part C, and Part D; Medicaid ; CHIP; Affordable Health Care Act.</i>	<i>A/B MAC (A) or HHH MAC FI Billing Records; A/B MAC (B) or DME MAC Carrier Billing Records; Medicare Benefit Check Records ; Reconsideration and Hearing Case Files - Hospital Insurance Program (Medicare Appeals) ; Review and Fair Hearing Case Files - Supplementary Medical Insurance Program (Medicare Appeals) ; MAC Administrative Budget Estimate and Cost Report Form); Budget request,</i>	<i>Temporary</i>	<i>7</i>	<i>Cutoff at the end of the calendar year. Destroy no sooner than 7 year(s) after cutoff but longer retention is authorized</i>

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
				<i>supplemental budget request, notice of budget approval, interim expenditure report; Supplementa l Budget Request; Notice of Budget Approval – The carrier/inter mediary's certified funding authority for the fiscal year. Include all supporting schedules, corresponde nce and justification; Interim Expenditure Report – Cumulative fiscal year to date expenditures incurred by the carrier/inter mediary.</i>			

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
				<p><i>Include all supporting schedules, correspondence and justifications .; Final Administrative Cost Proposal – The final statement of expenditures for the fiscal year. This form is used as the basis for final settlement of allowable costs.</i></p> <p><i>Include all supporting schedules, correspondence, HHS or GAO audit reports on administrative cost and benefits payments; MAC Letter of Credit Files); A/B MAC (A) or HHH MAC Payment Vouchers and</i></p>			

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
				<i>Transmittal Files); A/B MAC (B) or DME MAC Payment Vouchers and Transmittal Files); A/B MAC (A) or HHH MAC Monthly Financial Report Files); A/B MAC (B) or DME MAC Performance Report Files); A/B MAC (A) or HHH MAC Workload Reports Files); A/B MAC (B) or DME MAC Overpaymen t and Duplicate Charge Detection Activity Report Files); A/B MAC (A) or HHH MAC Cost Report Files); MAC Closing</i>			

<i>BUC KET / GRS</i>	<i>RECOR D SCHED ULE NAME</i>	<i>DISPOS ITION AUTHO RITY NUMBE R</i>	<i>DESCRI PTION</i>	<i>RECORD NAME/TYP E</i>	<i>FINAL DISPOS ITION</i>	<i>RETEN TION YEARS</i>	<i>DISPOSI TION INSTRUC TIONS</i>
				<i>Agreements); Medicare Data Match Files); Provider Statistical and Reimburse ment (PS&R); A/B MAC (B) or DME MAC Claims Processing File</i>			
<i>Buck et 4</i>	<i>Enrollme nt Records</i>	<i>DAA- 0440- 2015- 0006- 0001</i>	<i>Enrollme nt Records for all CMS Programs . Includes Medicare Part A, Part B, Part</i>	<i>Initial Enrollment Questionnair e</i>	<i>Tempora ry</i>	<i>7</i>	<i>Cutoff at the end of the calendar year. Destroy no sooner than 7 year(s) after cutoff but longer</i>

<i>BUC KET / GRS</i>	<i>RECOR D SCHED ULE NAME</i>	<i>DISPOS ITION AUTHO RITY NUMBE R</i>	<i>DESCRI PTION</i>	<i>RECORD NAME/TYP E</i>	<i>FINAL DISPOS ITION</i>	<i>RETEN TION YEARS</i>	<i>DISPOSI TION INSTRUC TIONS</i>
			<i>C, and Part D; Medicaid ; CHIP; Affordabl e Health Care Act.</i>				<i>retention is authorized</i>
<i>Buck et 5</i>	<i>Beneficia ry Records</i>	<i>DAA- 0440- 2015- 0007- 0001</i>	<i>Records that facilitate the managem ent of beneficiar ies (those eligible for all CMS programs)</i>	<i>Medicare Summary Notices (MSNs)</i>	<i>Tempora ry</i>	<i>10</i>	<i>Cutoff at the end of the calendar year. Retention Period Destroy no sooner than 10 year(s) after cutoff, but longer retention is authorized</i>

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
<i>Bucket 6</i>	<i>Provider and Health Plan Records</i>	<i>DAA- 0440- 2015- 0008- 0001</i>	<i>Records related to health care providers affiliated with CMS programs . Records related to health care providers affiliated with CMS systems and programs . Includes provider applicatio ns and certificati ons; health plan records; program review and audit records; hearing files; and administr ative records.</i>	<i>Ambulance Supplier Certification Files ; Requests for Assistance from District Offices (DOs)</i>	<i>Tempora ry</i>	<i>7</i>	<i>Cutoff at the end of the calendar year. Retention Period Destroy no sooner than 7 year(s) after cutoff but longer retention is authorized ,</i>

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
<i>Bucket 9</i>	<i>Compliance and Integrity</i>	<i>DAA-0440-2015-0012-0001</i>	<i>Records that support compliance and integrity activities and functions, regardless of CMS Program, including plans, agreements; administrative records, records related to surveys, reviews, and audits; reports; and legal records related to compliance and integrity operations.</i>	<i>Contract Performance Review Visit Files</i>	<i>Temporary</i>	<i>7</i>	<i>Cutoff at the end of the calendar year. Retention Period Destroy no sooner than 7 year(s) after cutoff but longer retention is authorized</i>

BUC KET / GRS	RECOR D SCH ED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
<i>Gene ral Recor ds Sched ule (GRS 1.1) / GRS 1.1, ITEM 11</i>	<i>Financial Manage ment and Reportin g Records</i>	<i>DAA- GRS- 2013- 0003- 0002</i>	<i>This schedule covers records created by Federal agencies in carrying out the work of financial managem ent: procuring goods and services, paying bills, collecting debts, accountin g for all financial transactio ns, and monitorin g agencies' net worth. It does not apply to copies of records forwarde d to the Departme nt of</i>	<i>Procuring goods and services is the acquisition of physical goods, products, personal property, 011 capital assets, infrastructur e services such as utilities, and contracted personnel services to be used by the Federal Government. Paying bills means disbursement s of federal funds for goods and services and fulfilling financial obligations to grant and cooperative agreement recipients. Procurement and payment records include those</i>	<i>Tempora ry</i>	<i>1</i>	<i>Destroy when business use ceases.</i>

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
			<p>Treasury or the Office of Management and Budget in fulfillment of reporting requirements. These forwarded copies serve unique business purposes at those agencies and are therefore scheduled separately as records of OMB and Treasury</p>	<p>such as: contracts requisitions purchase orders interagency agreements Military Interdepartmental Purchase Requests (MIPRs) printing requisitions to the Government Printing Office memoranda of agreement specifying a financial obligation solicitations/ requests for bids, quotations or proposals for contracts and competitive grants proposals, quotations, bids (accepted, rejected, unopened) for contracts</p>			

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
				<p><i>and competitive grants contingent fee justifications legal and financial instruments such as bond and surety records FAIR Act (A-76) records linked directly to specific procurement actions credit card/purchas e card/charge card statements and supporting documentati on vendor tax exemption records invoices leases recurring financial transactions such as utility and communicati</i></p>			

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
				<p><i>ons invoices documentati on of contractual administrativ e requirements submitted by contractors such as status reports Corresponde nce and papers pertaining to award, administrati on, receipt, inspection of and payment for goods and services in this list records of financing employee relocations</i></p>			

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
<i>GRS 5.2: Item 020</i>	<i>Intermedi ary Records</i>	<i>DAA- GRS- 2022- 0009- 0002</i>	<i>Intermedi ary records. Records that meet the following condition s: They exist for the sole purpose of creating a subseque nt record and they are not required to meet legal or fiscal obligatio ns, or to initiate, sustain, evaluate, or provide evidence of decision- making. This includes certain analog and electronic source</i>	<i>raw data used to create final print files; Medicare summary notices, standard paper remittance advices</i>	<i>Tempora ry</i>	<i>1</i>	<i>Destroy upon creation or update of the final record, or when no longer needed for business use, whichever is later.</i>

BUC KET / GRS	RECOR D SCHED ULE NAME	DISPOS ITION AUTHO RITY NUMBE R	DESCRI PTION	RECORD NAME/TYP E	FINAL DISPOS ITION	RETEN TION YEARS	DISPOSI TION INSTRUC TIONS
			<i>records for electronic systems that are not otherwise excluded.</i>				

30.30 - Records Retention and Disposition

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

The CMS Records schedule identifies records accumulated by contractors in administering the Medicare program and establishes disposition schedules for each record type. In accordance with 44 U.S.C. § 3303a and 36 CFR § 1226, contractors shall actively manage federal records disposition beyond storage and accessibility requirements.

30.30.1 - CMS Records and Information Management Program Objectives

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

In accordance with 44 U.S.C. § 2904 and 36 CFR § 1225.12, the CMS Records and Information Management Program establishes retention schedules for all CMS records to provide uniform guidelines for records retention and disposition; ensure compliance with legal, fiscal, and regulatory requirements; authorize disposal of obsolete records; promote efficient records management practices.

30.30.2 - Record Schedule Disposition Authority Numbers and Retention Periods

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

In accordance with 44 U.S.C. § 3303a and NARA-approved disposition authorities, Record Schedule Disposition Authority Numbers provide legal citations for retention and disposition authorizations for records created and maintained by CMS contractors supporting administrative, legal, regulatory, personnel, operational, and fiscal activities. The retention period refers to the legally mandated timeframe that records must be maintained before they are eligible for disposition (transfer to NARA or destruction), which varies based on the record type and its administrative, legal, or historical value. For example, Disposition Authority Number DAA-0440-2013-0001-0002 might authorize the retention of contractor performance evaluation records for seven years after contract completion before authorized destruction. No records shall be destroyed without documented concurrence from the Contractor, the COR/RLO, and the CMS Records Officer.

30.30.3 - Records Dispositioning Process

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

In accordance with 36 CFR § 1226.14 and as part of the Annual Report of Medicare Records, each calendar year contractors must review their file plans, complete comprehensive records inventories for both physical and electronic records, and identify records eligible for destruction. CMS will provide a template for annual reporting purposes. Contractors are required to complete an annual records management reporting process using CMS-provided templates. The process involves submitting three completed worksheets through the Annual Report Template (see Exhibit B), followed by a structured approval process that includes COR/RLO review with Division Director authorization, CMS Records Retention mailbox submission, RIM staff verification, and final CMS Records Officer approval. Once approved, contractors have 90 days to begin project execution. Vendors have flexibility in scheduling the destruction of authorized records but must maintain complete documentation of the destruction process. MACs shall inform CMS upon completion of destruction projects, with details included in the annual report. This streamlined system ensures federal compliance under 36 CFR regulations while maintaining proper oversight of Medicare program records disposition, with the critical requirement that no records may be destroyed without explicit CMS Records Officer approval.

Annual Review Requirements

In accordance with 36 CFR § 1226.14, at the beginning of each calendar year, contractors shall:

- 1. Review the FILE PLAN worksheet tab*
- 2. Complete the RECORDS INVENTORY worksheet tab for all physical and electronic records*
- 3. Complete the REQUEST FOR RECORDS DISPOSAL worksheet tab listing records eligible for destruction*
- 4. Submit all worksheets in the Annual Report Template (Exhibit B). MACs must inform CMS upon completion of destruction projects, with details included in the annual report.*

Destruction Process

In accordance with 36 CFR § 1228.170(b):

- 1. Authorization Period: Once approved, contractors have 90 days to begin project execution. MACs should inform CMS upon completion of destruction projects, with details included in the annual report.*
- 2. Documentation: Destruction supervisor shall document destruction date, signature, official title, and return final authorization to CMS Records Retention mailbox*

30.40 - National Archives and Records Administration (NARA) Universal Electronic Records Management (UERM) Requirements

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

The Universal ERM Requirements² identify high level business needs for managing electronic records. They are baseline ERM program requirements derived from existing statutes, standards, NARA regulations, policy, and guidance. These requirements are based on the lifecycle of electronic records management and include the following sections.

- Capture*
- Maintenance and Use*
- Disposal*
- Transfer*
- Metadata*
- Reporting*

² **NARA Universal Electronic Records Management (UERM) Requirements** provide the framework for federal agencies and their contractors to implement compliant electronic records management systems. These requirements establish the minimum functionality needed for records management in federal information systems. The complete UERM requirements can be accessed at: <https://www.archives.gov/records-mgmt/policy/universal-erm-requirements>.

These requirements address born-digital and digitized analog records. The requirements are either program requirements relating to the design and implementation of CMS' Electronic Records Management policies and procedures; or system requirements that provide technical guidance in creating ERM tools and specifications for requirements a system will need to manage electronic records.

30.40.1 - Information System Requirements

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

In accordance with OMB Circular A-130, paragraph 8a(1)(k), and HHSAR Part 304, Administrative Matters (DEVIATION), Subpart 304.70, Records Management, contractors must integrate comprehensive records management and archival functions into all information system design, development, and implementation activities. This federal mandate requires contractors to maintain the same rigorous records management standards as CMS, ensuring proper access, maintenance, control, storage, disposition, and transfer capabilities for all records throughout their lifecycle. Compliance with these requirements is a contractual obligation that supports the integrity and accountability of Medicare program operations while meeting federal regulatory standards for information governance. Refer to HHSAR Part 304, Administrative Matters (DEVIATION). Subpart 304.70, Records Management for details. Legacy systems created before the mandate are grandfathered and can use semi-automated or manual processes for records management. MACs can manage records either through system functionality or manual methods such as Excel spreadsheets, as long as records are categorized by type and year to determine retention and eligibility for destruction.

30.50 - Contract Initiation and Expiration

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

Throughout the contract lifecycle, from initiation to expiration, contractors must maintain strict adherence to information security, privacy requirements, and systematic documentation standards to ensure seamless operations and proper contract closeout procedures. During contract initiation, contractors establish foundational security protocols and system development frameworks that must be sustained throughout the contract period, while contract expiration requires comprehensive documentation transfer, systematic sanitization of all government information and IT resources, proper disposal of records in accordance with federal guidelines, and certification of data purging from contractor-owned systems. The transition process requires proactive coordination with Contracting Officers (CO), Contracting Officer Representatives (COR), and Information System Security Officers (ISSO) to ensure all government assets are appropriately returned, all documentation requirements are fulfilled within specified timeframes, and all security protocols are maintained until final contract closeout is completed, thereby protecting sensitive government information while facilitating operational continuity.

30.50.1 - General Security Requirements

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

The Contractor shall comply with information security and privacy requirements, Enterprise Performance Life Cycle (EPLC) processes, HHS Enterprise Architecture requirements to ensure information is appropriately protected from initiation to expiration of the contract. All information systems development or enhancement tasks supported by the contractor shall follow the HHS EPLC framework and methodology or the CMS SDLC, as amended and in accordance with the HHS Contract Closeout Guide (2012).

30.50.2 - System Documentation

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

Contractors shall follow and adhere to HHS/CMS System Development Life Cycle requirements, at a minimum, for system development and provide system documentation at designated intervals (specifically, at the expiration of the contract) within the EPLC and CMS SDLC that require artifact review and approval.

30.50.3 - Sanitization of Government Files and Information.

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

As part of contract closeout and at expiration of the contract, the contractor shall provide all required documentation in accordance with the CMS SDLC, as amended to the CO and/or COR to certify that, at the government's direction, all electronic and paper records are appropriately disposed of and all devices and media are sanitized in accordance with NIST SP 800-88, Guidelines for Media Sanitization.

30.50.4 – Notification

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

The Contractor shall continue to inform the CO, COR, and system ISSO as soon as possible before an employee stops working under agency contracts. This notification process shall be captured in the existing employee onboarding and offboarding enterprise system.

30.50.5 - Contractor Responsibilities upon Physical Completion of the Contract.

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

The contractor shall return all government information and IT resources (i.e., government information in non-government-owned systems, media, and backup systems) acquired during the term of this contract to the CO and/or COR. Additionally, the contractor shall provide a certification that all government information has been properly sanitized and purged from Contractor-owned systems, including backup systems and media used during contract performance, in accordance with HHS and/or CMS policies.

30.50.6 - Records Management and Retention

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

The contractor shall maintain all information in accordance with Executive Order 13556 - Controlled Unclassified Information, National Archives and Records Administration (NARA) records retention policies and schedules and HHS Policy for Records Management and CMS policies and shall not dispose of any records unless authorized by HHS/CMS. If a contractor accidentally disposes of or destroys a record without proper authorization, he/she shall document and report the incident to the CMS Agency Records Officer and RIM staff in accordance with HHS/CMS policies.

30.60 - Litigation Hold Obligations

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

A litigation hold is a notification to recipients to retain information in the agency's possession, custody, or control relevant to those claims or defenses. When CMS reasonably anticipates litigation or litigation has commenced, CMS has a duty to take reasonable steps to preserve information relevant to any party's claims or defenses at issue in a manner that is proportional to the needs of the case. In accordance with (Fed. R. Civ. Pro. 26(b)(1), 37(e)), contractors shall personally take appropriate steps to preserve any responsive information that is in their possession, custody, or control. Accordingly, until notified otherwise, contractors shall preserve, and refrain from discarding, any and all responsive information related to a litigation hold. Steps shall be taken to suspend routine document retention, destruction policies and practices, including, but not limited to, those in the records schedule. Contractors must maintain strict confidentiality of litigation

hold communications and may not share litigation hold information with external parties, including grantees, nonprofits, advocacy groups, legal representatives, providers, or suppliers.

Preservation shall occur even if the information sought may ultimately be withheld as privileged, protected, classified, or confidential, or determined to be unreasonably burdensome to produce. If information subject to a litigation hold is destroyed, a court may impose sanctions, including the exclusion of evidence, the dismissal of a claim, the production of privileged information, and/or award costs and attorney fees against the government. When transferring responsibilities or ending CMS relationships, contractors must consult with the Contracting Officer's Representative (COR) and follow established litigation records management procedures to ensure continuity of litigation hold compliance and proper transfer of preserved documents.

Documents include all forms of written material, whether in final or draft form, original or duplicates, complete or partial, official or unofficial. Examples include memoranda, reports, printed emails, maps, diagrams, correspondence, spreadsheets, presentation materials, and notes (including handwritten notes). Hardcopy documents shall be preserved even if they are duplicative of electronically stored information.

The types of information related to the categories that shall be preserved include the following:

- A. Electronically Stored Information (ESI): Information that is stored electronically, regardless of the type of media, as opposed to information that is stored in hard copy (i.e., on paper). ESI includes, but is not limited to, word processing files, e-mail messages, archived e-mails, metadata, text messages, other electronic communication including voicemail, telephone log entries, databases, scanned/static images (PDFs or TIFFs), Internet usage files, systems manuals, network access information, drafts, spreadsheets, data, PowerPoint presentations, calendar entries, address books, digital photographs or other digital images, audio recordings, floppy discs, CDs, DVDs, and flash memory media, including USB drives and memory cards for cameras and cell phones. ESI should be preserved in its originally created or native format. This information includes not only content stored on HHS computers, but can also include information stored on home computers, personal laptop computers, personal e-mail accounts, and PDAs or mobile phones such as Blackberries, iPhones, and Androids, if used for work. ESI shall be preserved even if it is duplicative of hardcopy documents.*
- B. Metadata: Data typically stored electronically that describe characteristics of ESI, such as how ESI is formatted, or how, when or by whom ESI is collected, created, accessed, or modified. Metadata can be supplied by applications, users, or the file system.*
- C. Tangible Things: Tangible things are items that are likely to have discoverable information such as equipment, laboratory samples, specimens, and photographs.*

30.60.1 - CMS Contractor Litigation Hold Certification Requirements

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

When a Contractor receives a CMS Litigation Hold Memorandum from their contracting officer, the Contractor must immediately implement the litigation hold requirements and provide certification of compliance. The memorandum will be shared with Contractors when CMS components identify that the Contractor may possess potentially responsive documents relevant to ongoing or anticipated litigation.

Upon receipt of the litigation hold memorandum, Contractors must follow these steps:

- Immediately suspend all routine destruction or disposal of potentially responsive documents*
- Notify relevant personnel within the Contractor's organization about the litigation hold requirements*
- Implement preservation measures for all identified document categories and types*
- Conduct a comprehensive search for potentially responsive documents across all systems and storage locations*
- Maintain detailed records of all preservation actions taken*

- Provide written certification to CMS confirming implementation of the litigation hold by completing and signing the CMS Contractor Litigation Hold Certification & Information Form
- Provide names of identified litigation hold custodians within their organization to the COR
- Report any challenges or issues in implementing the hold to the CMS contracting officer

Contractors must ensure full compliance with the litigation hold requirements until formally notified by CMS that the hold has been lifted. Failure to properly implement and maintain litigation hold requirements may result in legal consequences and potential contract violations.

30.70 - Digitization Requirements

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

In accordance with 84 FR 14266 (April 10, 2019) and federal regulations, CMS contractors must follow specific requirements when digitizing temporary federal records to ensure compliance with records management standards and facilitate the transition to electronic recordkeeping systems.

In accordance with 36 CFR § 1236.32 and § 1236.34, contractors must meet all required digitization standards before designating digital versions as recordkeeping copies, validate the digitization process through documented procedures, and capture complete information from original source records including all pages and components. This comprehensive approach ensures that the digitized records maintain the integrity and completeness of the original documents while meeting federal regulatory requirements for electronic recordkeeping systems.

As a CMS contractor, if you intend to digitally reproduce (digitize) temporary records to designate the digitized version as the recordkeeping copy and destroy the original source records, you shall:

1. In accordance with 36 CFR § 1236.32, digitize the records to meet all required standards
2. In accordance with 36 CFR § 1236.34, validate the digitization process

When the digitized version becomes the designated recordkeeping copy, the original source record is reclassified as an intermediary record. You may dispose of these intermediary records in accordance with 36 CFR § 1236.36 and General Records Schedule (GRS) 5.2.

30.70.1 - Digitization Standards

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

When digitizing temporary records, you shall meet the following standards in accordance with 36 CFR § 1236.32:

1. Capture all information contained in the original source records
2. Include all pages or parts from the original source records
3. Ensure the digitized versions can be used for all purposes the original source records serve, including the ability to attest to transactions and activities
4. Implement protections against unauthorized deletions, additions, or alterations to the digitized versions
5. Ensure the digitized versions can be located, retrieved, accessed, and used throughout their entire retention period

30.70.2 - Validation Requirements

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

In accordance with 36 CFR § 1236.34:

- 1. You may establish your own validation process or utilize third-party processes to validate that digitized versions comply with the standards in 36 CFR § 1236.32*
- 2. You shall document your validation process and retain that documentation for the life of the process or the life of any records digitized using that process, whichever is longer*
- 3. Be aware that CMS and/or NARA may review your validation documentation as needed*

30.70.3 - Disposing of Original Source Records

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

After successful digitization and validation:

- 1. In accordance with General Records Schedule (GRS) 5.2 and 36 CFR § 1236.36, you may destroy the original source records after digitization, subject to any pending legal constraints such as litigation holds*
- 2. You shall treat the digitized versions (now the recordkeeping versions) with the same care and retention requirements as the original source records*
- 3. You shall retain the digitized versions for the remaining portion of any retention period established by the applicable records schedule*
- 4. You do not need to obtain CMS or NARA approval to destroy scheduled temporary records that have been properly digitized according to these requirements*

This guidance ensures your compliance with federal records management regulations while facilitating the transition to electronic recordkeeping systems.

30.80 - Record Storage

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

CMS has established comprehensive requirements for contractors utilizing commercial storage facilities to house Federal records. Under federal regulations 44 U.S.C. § 3102 and 36 CFR § 1220.34, contractors bear the same responsibility as CMS for ensuring all records in their physical custody are stored in appropriate facilities that meet federal standards. These requirements mandate that contractors ensure any commercial vendor housing Federal records be approved by CMS and certified by the National Archives and Records Administration (NARA) in accordance with 36 CFR § 1234.12 and § 1234.30. The requirements include facility structural standards, environmental controls, fire safety measures, and comprehensive documentation processes, including mandatory submission of inspection checklists and certification letters to the CMS Records Officer at Records_Retention@cms.hhs.gov at least 120 days before transferring records. Additionally, NARA has the authority to conduct periodic inspections of commercial facilities and specific procedures are outlined for facility transfers, ensuring that all Federal records remain protected and accessible while maintaining compliance with federal records management regulations throughout their lifecycle.

30.80.1 Commercial Storage Facilities

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

In accordance with 44 U.S.C. § 3102 and 36 CFR § 1220.34, CMS contractors are responsible for ensuring that all records in their physical custody are stored in appropriate space. Contractors shall adhere to the same requirements as CMS for records storage and management. Records centers and commercial records

storage facilities are referred to collectively as records storage facilities. In accordance with 36 CFR § 1234.30, contractors may contract for commercial records storage services. However, before any agency records are transferred to a commercial records storage facility, contractors shall ensure that the facility meets all the requirements for an agency records storage facility set forth in subpart § 1234.30 and shall submit the required documentation to CMS. Contractors must verify facilities meet NARA standards, maintain contact information, and obtain certification copies, with inspections conducted by NARA every five years. contractors shall obtain and maintain copies of NARA inspection certifications from commercial storage facilities, ensuring compliance with CFR 1234 standards and annual updates of contact information.

In accordance with 44 U.S.C. § 2904 and 36 CFR § 1234, NARA is authorized to promulgate standards, procedures, and guidelines to Federal agencies and their contractors with respect to the storage of records in commercial records storage facilities. NARA initiates facility inspections on a rotating five-year basis, and contractors are responsible for ensuring their facilities remain compliant and up to date with fire safety and climate control requirements.

30.80.2 - Standards for All Records Storage Facilities

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

A facility that is used to store Federal records, shall meet the minimum structural, environmental, property and fire safety standards as outlined in 36 CFR Part 1234 Facility Standards for Records Storage Facilities. The facility shall be constructed with non-combustible materials and building elements, including walls, columns and floors. CMS is responsible for ensuring that records in their legal custody are stored in appropriate space as outlined in this part. Under § 1232.18(a), agencies are responsible for initiating action to remove records from space that does not meet these standards if deficiencies are not corrected within 6 months after initial discovery of the deficiencies by NARA or the agency and to complete removal of the records within 18 months after initial discovery of the deficiencies.

To store Federal records in a commercial records storage facility, you shall document that the facility meets the 36 CFR 1234 storage standards. You shall submit a Facility Standards for Record Storage Facilities Inspection Checklist (see Exhibit A) for all records storage facilities used to store CMS records to the CMS Records Officer at Records_Retention@cms.hhs.gov.

30.80.3 - Transfer of Federal Records stored in Commercial Facilities

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

If you are planning to relocate any Federal records to a different approved storage facility, provide the following information at least 120 days prior to the move date to the CMS Records Officer at:

Records_Retention@cms.hhs.gov

- Move date,*
- Name of the old and the new storage facility and address*
- Rough volume figure of how many cubic feet of records are involved.*

The contractor shall provide documentation demonstrating that the commercial facility meets the storage standards set in 36 CFR 1234 before beginning to transfer records to a commercial records storage facility,. Submit separate documentation for each individual facility that you will use. Contractors using a commercial vendor or planning to move records from one commercial facility to another that has not been certified and approved, shall complete the three documents listed below and submit to the CMS Records Officer at Records_Retention@cms.hhs.gov.

- *Inspection Checklist for Records Storage Facilities,*
- *Certification letter from a Fire Protection Engineer and a Structural Engineer § 1234.12 What are the fire safety requirements that apply to records storage facilities, and*
- *Description and volume of records*

Once certified and approved, you will receive notification that the facility is approved, and that it will be added to the list of approved facilities

30.80.4 - Commercial Storage Facilities Inspections

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

NARA is authorized to conduct periodic inspections of any commercial records storage facility used by CMS and its contractors for compliance with the 36 CFR 1234 Facility Standards for Records Storage Facilities.

1234.10(c): FEMA 100-year flood map (available at <https://msc.fema.gov/portal/search>)

1234.10(d): Appendix A (S4): AHJ Fire Marshall and/or Fire Department Inspection

1234.10(j): UL (Burglar) Alarm Central Monitoring Certificate

1234.10(k): Appendix A (S3): Security System Inspection

1234.10(m): Integrated Pest Management (IPM) service Inspection

1234 Appendix B (2b) & (2f): Annual Sprinkler System & Fire Alarm Inspections

Upon request from the CMS RIM Staff, Contractors shall provide the Point of Contact for the commercial records storage facility prior to the inspections for coordinating scheduling the inspections and providing an updated Facility Standards for Records Storage Facilities Inspection Checklist for each facility.

30.90 - Annual Reporting

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

Contractors are required to comply with the Annual Report of Medicare Records Requirements outlined in section 30.90 of this manual. This mandatory annual reporting process ensures that proper records management practices are maintained and meet federal regulatory compliance standards. At the beginning of each calendar year, contractors must conduct a comprehensive assessment of their records inventory and submit detailed file plans to CMS at Records_Retention@cms.hhs.gov. The contractor's assessment must cover all official records under their management, including those stored in electronic systems, databases, and commercial storage facilities, with special attention to identifying and protecting personally identifiable information (PII) and protected health information (PHI). Contractors are responsible for documenting all record categories, retention schedules, storage locations, and volume assessments according to both CMS Records Schedule requirements and NARA General Record Schedule guidelines. This annual reporting requirement helps contractors maintain organized records management practices while supporting CMS's oversight responsibilities and ensuring the integrity and accessibility of records under the Contractor's stewardship.

30.90.1 Annual Report of Medicare Records Requirements

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

Medicare contractors shall submit an Annual Report of Medicare Records at the beginning of each calendar year using the required Annual Report of Medicare Records template provided by CMS (see Exhibit B). Contractors must utilize the current template format specified by CMS to ensure standardized reporting and compliance with federal records management standards. The completed template must include all

mandatory components and documentation as outlined in the provided format, and submissions that do not use the required template may be rejected or returned for correction.:

Required Components

1. Records Inventory

- Complete review of all official records*
- Electronic storage locations*
- Commercial storage facilities*
- Volume assessment*
- PII/PHI identification*
- Essential records designation*
- Special access requirements*

2. File Plan

- Use current template*
- Record categories and types*
- Retention schedules*
- Location details*
- Volume information*

Process Steps

1. Review and Assessment

- Consult CMS Records Schedule*
- Review NARA General Record Schedule*
- Document all storage locations*
- Identify sensitive information (PII/PHI)*

2. Verification Checklist

- Complete records categories*
- Accurate retention schedules*
- Current storage locations*
- Updated volume of information*
- Correct file plan template*

Submission

- Due: Start of calendar year*
- Submit to: Records_Retention@cms.hhs.gov*
- Format: Current Annual Report template*
- Include: Complete inventory and file plan*

This annual report ensures proper records management and compliance with federal regulations while maintaining accurate tracking of Medicare records across all storage locations.

30.100 Exhibits

(Rev. 13718; Issued: 04-10-26; Effective: 05-11-26; Implementation: 09-14-26)

30.100.1 Exhibit A. CMS-Certified and NARA-Approved Commercial Storage Facilities

30.100.3 Exhibit B. Annual Report Template

CMS Contractor Litigation Hold Certification & Information Form for
[Insert Case Name]

I. CERTIFICATION

I declare that, to the best of my information and belief, I have caused all appropriate personnel of **[insert name of CMS Contractor]**, including (but not limited to) those listed in **Section II** below, to become aware and informed that (i) a Litigation Hold exists in the above-captioned matter; (ii) this Litigation Hold imposes an ongoing duty to preserve and retain certain documents, records, data, or files, whether maintained electronically or in hard copy, pertaining to the above-captioned matter, and that are within the categories of information to be preserved, and (iii) this Litigation Hold remains in effect until expressly advised by CMS that this litigation hold has been lifted.

Printed Name/Title

Signature

Contract

Executed on date

II. INFORMATION ON POTENTIAL DOCUMENT CUSTODIANS

Please list the **names and contact information** (telephone numbers and e-mails) of all **individuals within your organization** whom you have identified as potentially having responsive information in their possession, custody, or control for this litigation hold. If you do not believe your organization has potentially responsive information in its possession, custody, or control, please note this in the space provided below with a brief explanation. Please attach additional paper if needed.

This completed original form must be returned **{SELECT ONE}** [within fifteen business days of the issuance date of this TDL in PDF file format] [by {insert date two weeks from notice}] to: [Insert full contact information for COR]

NOTE: The requirements of this litigation hold are continuing; if you learn of any new individuals who have potentially responsive information, or if any named custodian is leaving your organization, please notify the OGC attorney for this litigation hold: [Insert name and email address of OGC attorney]

Facility Standards for Records Storage Facilities Inspection Checklist

Complete all sections of this checklist for the commercial records storage facility. Also complete either the included Supplemental Checklist for Appendix B Fire-Safety Systems or provide the information required by 36 CFR 1234.3. This checklist was updated in October 2012 to show the current citations to 36 CFR 1234. The earlier used citations to 36 CFR 1228 subpart K were changed to 36 CFR 1234 but the regulation content remains the same.

Facility Standards for Records Storage Facilities Inspection Checklist (Effective date of checklist September 2005)		
Federal Agency:		
Facility:	Common Name:	
	Street Address	
	City, State & Zip	
	Facility description (size and capacity):	
Facility Director or Representative:	... Comments explaining or disagreeing with inspection findings are attached.	
Inspector or Reviewer:	_____	_____
		Date
Inspector or Reviewer:	_____	_____
		Date
INSPECTION/REVIEW DATE:		
List of Attachments		
Description	Yes	N/A
Supplemental Checklist for Appendix B Fire-Safety Systems		
Certification of fire-safety detection and suppression system (36 CFR 1234.32)		
Exceptions caused by Code Conflicts (36 CFR 1234.20)		
Waiver request(s) (36 CFR 1234.22)		
Other: (Describe)		

Section 1 - Compliance with 36 CFR 1234.10 Facility Requirements				
§1234.10 paragraph:	Requirement	OK	No	Other
(a)	The facility must be constructed with non-combustible materials and building elements, including walls, columns, and floors.			
(a) exception 1	If the roof is constructed of combustible material it is protected by a properly installed and maintained wet-pipe automatic sprinkler system.			
(a) exception 2	Existing records storage facility with combustible building elements has an approved waiver from NAS that allows continued use until October 1, 2009 provided documentation has been submitted that indicates a fire-suppression system designed to mitigate the risk is present.			
(b)	A facility with two or more stories must be designed or reviewed by a licensed fire protection engineer and civil/structural engineer to avoid catastrophic failure of the structure due to an uncontrolled fire on one of the intermediate levels.			
(c)	The building must be sited a minimum of five feet above and 100 feet from any 100 year flood plain areas, or be protected by an appropriate flood wall (see FEMA flood maps)			
(d)	The facility must be designed in accordance with national, regional, state or local building codes (whichever is most stringent) to provide protection from building collapse or failure of essential equipment from earthquake hazards, tornadoes, hurricanes, and other natural disasters.			
(e)	Roads, fire lanes, and parking areas must permit unrestricted access for emergency vehicles.			
(f)	A floor load limit must be established for the records storage area by a licensed structural engineer. ... The allowable load limit must be posted in a conspicuous place and must not be exceeded.			
(g)	The facility must ensure that the roof membrane does not permit water to penetrate the roof. (New buildings: effective 9/28/2005; existing buildings: effective 10/1/2009)			
(h)	Piping (with the exception of sprinkler piping and limited storm water roof drainage piping – see 36 CFR 1228.228(h) of the rule for further information) must not be run through the records storage area unless supplemental measures ... are used to prevent water leaks ... (New buildings: effective 9/28/2005; existing buildings: effective 10/1/2009)			
(i)(1)	All racking systems, steel shelving, or other open-shelf records storage equipment must be designed and installed to provide seismic bracing that meets the requirements of the applicable state, regional, and local building code (whichever is most stringent).			
(i)(2)	Racking systems, steel shelving, or other open-shelf records storage equipment must be braced to prevent collapse under full load. Each racking system or shelving unit must be industrial style shelving rated at least 50 lbs per cubic foot supported by the shelf.			
(i)(3)	Compact shelving, if used, must be designed to permit proper air circulation and fire protection ...			
(j)	The records storage area must be equipped with an anti-intrusion alarm system ... meeting the requirements of UL 1076, Proprietary Burglar Alarm Units and Systems (level AA) The alarm system must be monitored in accordance with UL 611, Central Station Burglar Alarm Systems.			
(k)	The facility must comply with the requirements for a Level III facility. (36 CFR 1234 Appendix A -- see Section 4 of this Checklist)			

Section 1 - Compliance with 36 CFR 1234.10 Facility Requirements				
§1234.10 paragraph:	Requirement	OK	No	Other
(l)	Records contaminated by hazardous materials ... must be stored in separate areas having separate air handling systems from other records.			
(m)	The facility must have an Integrated Pest Management program.			
(n)	The following additional requirements apply only to new facilities:			
(n.1)	(1) No mechanical equipment containing motors in excess of 1 HP within records storage areas (excluding material handling and conveyance equipment that have operating thermal breakers on the motor).			
(n.2)	(2) No high-voltage electrical distribution equipment (i.e., 13.2kv or higher) in records storage areas.			
(n.3)	(3) A redundant source of primary electrical service ... should be provided Manual switching between sources of service is acceptable. (See text in rule; applies to HVAC, fire and security alarms.)			
(n.4)	(4) For new facilities that store permanent records:			
requirement a.	a. A facility storing permanent records must be kept under positive pressure.			
requirement b.	b. No intake louvers in loading dock areas, parking or other areas subject to vehicle traffic.			
requirement c.	c. Separate air supply and exhaust system for loading docks.			

Section 2 - Compliance with 36 CFR 1234.12 Fire Safety Requirements				
§1234.12 paragraph:	Requirement	OK	No	Other
(a)	The fire detection and protection system must be designed or reviewed by a licensed fire protection engineer. Review requires submission of a report under the seal of a licensed fire protection engineer; see rule text for minimum requirements.			
(b)(1)	All walls separating records storage areas from each other and from storage areas within the building must be at least 3-hour fire barrier walls.			
(b)(2)	The quantity of Federal records stored in a single records storage area must not exceed 250,000 cubic feet.			
(c)(1)	For existing records storage facilities, at least 1-hour rated fire barrier walls must be provided between the records storage area(s) and other auxiliary spaces.			
(c)(2)(a)	For new records storage facility, 2-hour-rated fire barrier walls must be provided between the records storage area(s) and other auxiliary spaces.			
(c)(2)(b)	For new facilities, at least one exterior wall of each stack area must be designed with a maximum fire resistive rating of one-hour, or, if rated more than one-hour, there must be at least one knock-out panel in one exterior wall of each stack.			
(d)	Penetrations in the walls must not reduce the specified fire resistance ratings.			

Section 2 - Compliance with 36 CFR 1234.12 Fire Safety Requirements				
§1234.12 paragraph:	Requirement	OK	No	Other
(e)	The fire resistive rating of the roof must be a minimum of ½ hour.			
(e) alternate	Unrated roof is protected with an automatic sprinkler system in accordance with NFPA 13.			
(f)	Openings in fire barrier walls must be protected by self-closing or automatic Class A fire doors, or equivalent doors that maintain the same rating as the wall.			
(g)	Roof support structures that cross or penetrate fire barrier walls must be cut and independently supported on each side of the fire barrier wall.			
(h)	If fire barrier walls are erected with expansion joints, the joints must be protected to their full height.			
(i)	Building columns in records storage areas must be 1-hour fire resistant.			
(i) alternate	Unrated columns are protected in accordance with NFPA 13.			
(j)(1)	Automatic roof vents for routine ventilation purposes must not be designed into new records storage facilities.			
(j)(2)	Automatic roof vents, designed solely to vent in the case of a fire, with a temperature rating of at least twice that of the sprinkler heads are acceptable.			
(k)	Where lightweight steel roof or floor supporting members are present, they must be protected either by applying a 10-minute fire resistive coating to the top chords of the joists, or by retrofitting the sprinkler system with large drop sprinkler heads. (see rule text)			
(l)	Open flame (oil or gas) unit heaters or equipment, if used, must be installed or used in any records storage area in accordance with NFPA 54 and the Uniform Mechanical Code.			
(m)	For existing records storage facilities, boiler rooms or rooms containing equipment operating with a fuel supply ... must be separated from records storage areas by a 2-hour rated fire barrier wall with no openings directly from those rooms to the records storage area(s). Such areas must be vented directly outside to a location where fumes will not be drawn back into the facility.			
(n)	For new records storage facilities, boiler rooms or rooms containing equipment operating with a fuel supply ... must be separated from records storage areas by a 4-hour rated fire barrier wall with no openings directly from those rooms to the records storage area(s). Such areas must be vented directly outside to a location where fumes will not be drawn back into the facility.			
(o)	For new records storage facilities, fuel supply lines must not be installed in areas containing records, and must be separated from such areas with 4-hour-rated construction.			
(p)	Equipment rows running perpendicular to the wall must comply with NFPA 101 Life Safety Code, with respect to egress requirements.			
(q)(1)	No oil-type transformers, except thermally protected devices included in light ballasts, may be installed in records storage areas.			
(q)(2)	All electrical wiring must be in metal conduit, except that armored cable may be used where flexible wiring connections to light fixtures are required			
(q)(3)	Battery charging areas for electric forklifts must be separated from records storage areas with at least a 2-hour rated fire barrier wall.			
(r)	Hazardous materials ... must not be stored in records storage areas.			

Section 2 - Compliance with 36 CFR 1234.12 Fire Safety Requirements				
§1234.12 paragraph:	Requirement	OK	No	Other
(s)	<p>All records storage and adjoining areas must be protected by a professionally designed fire-safety detection and suppression system that is designed to limit the maximum anticipated loss from any single fire event to a maximum of 300 cubic feet of records destroyed.</p> <ul style="list-style-type: none"> For systems in accordance with 36 CFR 1234 Appendix B, attach Supplemental Checklist for Appendix B Fire-Safety Systems. For other designs, see § 1234.32 for documentation requirements. 			

Section 3 - Compliance with 36 CFR 1234.14 Environmental Control Requirements				
§1234.14 Paragraph:	Requirement	OK	No	Other
(a)	Paper-based temporary records must be stored under environmental conditions that prevent the active growth of mold. (See rule text)			
(b)	Nontextual temporary records, including microforms and audiovisual and electronic records, must be stored in records storage space that will ensure their preservation for their full retention period. Effective 09/28/2005 for new records storage facility and 10/1/2009 for existing facilities. (See rule text)			
(c)	Paper-based permanent, unscheduled, and sample/select records must be stored in records storage space that provides 24 hour/365 days per year air conditioning equivalent to that required for office space. (See rule text) Effective date: New facilities 09/28/2005; existing facilities 10/1/2009			
(d)	Nontextual permanent, unscheduled and/or sample/select records: see parts 1238, 1237, and/or 1236 of 36 CFR subchapter B.			

Section 4 - Minimum Security Requirements (Appendix A)
Compliance with Federal Facility Security Standards, Level III
 For explanation of requirements, see File 6 of this Toolkit or <http://www.archives.gov/about/regulations/appendix-a.html>

Citation	Requirement	OK	No	Partial
S1	Control of facility parking			
S2	Receiving/shipping procedures			
S3	Intrusion detection system with central monitoring			
S4	Meets <i>Life Safety Standards</i>			
S5	Adequate exits from records storage areas			
S6	High security locks on entrances/exits			
S7	Visitor control/screening system			
S8	Prevent unauthorized access to utility areas			
S9	Provide emergency power to critical systems			
S10	Conduct background security checks and/or establish security control procedures for service contract personnel			

Notes – use this space to add information about “Other” and “Partial” answers in Sections 1 through 4 of the Checklist

Supplemental Checklist for Appendix B Fire-Safety Systems
Compliance with 36 CFR Part 1234 Appendix B
(Complete this checklist ONLY if the facility claims to be using the system described in Appendix B)

Paragraph	Requirement	OK	No	Partial
2a.	The records storage height must not exceed the nominal 15 feet (+/- 3 inches) records storage height.			
2b.	All records storage and adjoining areas must be protected by automatic wet pipe sprinklers.			
2c.	1. The sprinkler system must be rated at no higher than 285 degrees Fahrenheit utilizing quick response (QR) fire sprinkler heads.			
	2. The sprinkler system must be designed by a licensed fire protection engineer to provide the specified density for the most remote 1,500 square feet of floor area at the most remote sprinkler head in accordance with NFPA 13 (1996), Standard for the Installation of Sprinkler Systems.			
	3. Installation of the sprinkler system must be in accordance with NFPA 13 (1996), Standard for the Installation of Sprinkler Systems.			
	4. Contractor's Material and Test Certificates per NFPA 13 chapter 8.			
	5. Hydraulic Calculations.			
2d.	1. Maximum spacing of the sprinkler heads must be on a 10-foot grid.			
	2. The positioning of the heads must provide complete, unobstructed coverage, with a clearance of not less than 18 inches, but not more than 60 inches, from the top of the highest stored materials.			
2e.	The sprinkler system must be equipped with a water-flow alarm connected to a continuously staffed fire department or central station, with responsibility for immediate response.			
2f.	1. A manual fire alarm system must be provided with central station services or other automatic means of notifying the municipal fire department.			
	2. A manual alarm pull station must be located adjacent to each exit.			
2g.	All water cutoff valves in the sprinkler system must be equipped with automatic closure alarm connected to a continuously staffed station, with responsibility for immediate response.			
2h.	A dependable water supply free of interruption must be provided. This normally requires a backup supply system having sufficient pressure and capacity to meet both fire hose and sprinkler requirements for 2 hours.			
2i.	Interior stand-pipe stations equipped with 1 ½ inch diameter hose may be provided in the records storage areas if required by the local			

Supplemental Checklist for Appendix B Fire-Safety Systems

Compliance with 36 CFR Part 1234 Appendix B

(Complete this checklist ONLY if the facility claims to be using the system described in Appendix B)

Paragraph	Requirement	OK	No	Partial
	fire department, enabling any point in the records storage area to be reached by a 50-foot hose stream from a 100-foot hose lay. If hose is provided, the cabinets must be marked "For Fire Department Use Only."			
2j.	Where fire hose cabinets are not required, stand-pipes must be provided at each floor landing in the building core or stair shaft. Hose outlets must have easily removable adapter and cap. Threads and valves must be compatible with the local fire department's equipment. Spacing must be so that any point in the records storage area can be reached with a 50-foot hose stream from a 100-foot hose lay.			
2k.	In addition to the designated sprinkler flow demand, 500 gpm must be provided for hose stream demand. The hose stream demand must be calculated into the system at the base of the main sprinkler riser.			
2l.	1. Fire hydrants must be located within 250 feet of each exterior entrance or other access to the records center that could be used by fire-fighters.			
	2. All hydrants must be at least 50 feet away from the building walls and adjacent to a roadway usable by fire apparatus. Fire hydrants must have at least two 2-½ inch hose outlets and a pumper connection. All threads must be compatible with local standards.			
2m.	Portable water-type fire extinguishers (2½ gallon stored-pressure type) must be provided at each fire alarm striking station (see also NFPA 10).			
2n.	1. Where provided, the walking surface of the catwalks must be of expanded metal at least 0.09-inch thickness with a 2-inch mesh length. The surface opening ratio must be equal or greater than 0.75.			
	2. The sprinkler water demand for protection over bays with catwalks where records are not oriented perpendicular to the aisles must be calculated to give 0.3 gpm per square foot for the most remote 2,000 square feet.			
Notes for Supplemental Checklist				
Reference	Comments			