



**Memorandum from the Office of the Inspector General**

June 2, 2010

Jeffrey T. Parsley, EB 3G-C  
Daniel A. Traynor, SP 5A-C

**FINAL REPORT – INSPECTION 2008-11829 – REVIEW OF TVA'S RECORDS  
RETENTION**

Attached is the subject final report for your review and action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete.

Information contained in this report may be subject to public disclosure. Please advise us of any sensitive information in this report that you recommend be withheld.

If you have any questions, please contact Kristin S. Leach, Auditor, at (423) 785-4818 or Gregory C. Jaynes, Deputy Assistant Inspector General, Inspections, at (423) 785-4810. We appreciate the courtesy and cooperation received from your staff during this review.

*Robert E. Martin*

Robert E. Martin  
Assistant Inspector General  
(Audits and Inspections)  
ET 3C-K

KSL:NLR  
Attachment  
cc (Attachment):

Steven A. Anderson, SP 5A-C  
Ricky L. Eason, EB 3E-C  
Peyton T. Hairston, Jr., WT 7B-K  
Janet C. Herrin, WT 10D-K  
Tom D. Kilgore, WT 7B-K  
Richard W. Moore, ET 4C-K

David R. Mould, WT 7B-K  
Mary E. Ragland, EB 5B-C  
Emily J. Reynolds, OCP-1L-NST  
Joyce L. Shaffer, WT 9B-K  
Robert B. Wells, WT 9B-K  
OIG File No. 2008-11829



Tennessee Valley Authority  
Office of the Inspector General

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# *Inspection Report*

## **REVIEW OF TVA'S RECORDS RETENTION**

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Inspection 2008-11829  
June 2, 2010

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MEMORANDUM DATED MAY 26, 2010, FROM DANIEL A. TRAYNOR AND  
JEFFREY T. PARSLEY TO ROBERT E. MARTIN



## TVA Office of the Inspector General

June 2010

### Inspection 2008-11829 Review of TVA Records Retention

#### Why the OIG Did This Review

At the request of the Chief Executive Officer, we initiated a review of records retention policies and practices at TVA. Our review was later postponed due to the Kingston Ash Spill.

As a federal agency, TVA is responsible for ensuring that any information providing official documentation of TVA programs and activities is identified, maintained, stored, and disposed of as required by law.

The objectives of our review were to determine (1) whether records are being maintained in accordance with TVA policies and procedures and (2) if opportunities exist to improve records retention and disposal activities in light of office space consolidation initiatives.

#### What the OIG Recommends

We recommend TVA's Vice President and Chief Information Officer, Information Services, in conjunction with the Vice President of Facilities Management, (1) continue current plans to replace EDMS (Electronic Document Management System) with a new system that has more user-friendly search and retrieval functions; (2) provide guidance on the format for retention of records, taking into account records retention times; (3) implement further cleanup initiatives when feasible, including the identification, review, and proper disposition of unknown records and materials; and (4) re-emphasize the importance of safe-guarding personally identifiable information.

The Vice President and Chief Information Officer, Information Services, in conjunction with the Vice President of Facilities Management, provided comments on this report. Management agreed with our recommendations and plans to take corrective actions. We agree with management's planned actions to address our recommendations.

For more information, please contact Robert E. Martin, Assistant Inspector General, Audits and Inspections, at (865) 633-7450 or [remartin@tva.oig.gov](mailto:remartin@tva.oig.gov); or Gregory C. Jaynes, Deputy Assistant Inspector General, Inspections, at (423) 785-4810 or [gcjaynes@tva.oig.gov](mailto:gcjaynes@tva.oig.gov).

#### What the OIG Found

Our review found TVA complied with TVA records management policies, practices, and procedures, and records identified in sampling were generally maintained in accordance with the National Archives and Records Administration-approved record schedules. We did note some areas where compliance could be strengthened.

In addition, while we found that TVA plans to replace its current electronic management system which should increase the efficiency and effectiveness of records management, areas for improvement exist in the Chattanooga Office Complex pertaining to (1) records management, (2) records retention, (3) disposal of records and material, (4) the maintenance and upkeep of office space, and (5) the identification of records. Specifically:

- Business Units were keeping record material in hard-copy format with long retention times that could possibly be kept more efficiently off-site or in electronic format. In addition, nonrecord material was often kept beyond its useful life.
- TVA's current document management system hampers electronic record retention and disposal due to its limited capabilities and information technology structure.
- Organizations were sometimes unaware of the content of files and boxes, many work areas in the Chattanooga Office Complex were cluttered and disorganized and contained unauthorized items, and unlocked cabinets contained personally identifiable information.

## **BACKGROUND**

Tennessee Valley Authority's (TVA) Records Management Program is a conducted pursuant to guidance issued by the National Archives and Records Administration.<sup>1</sup> TVA is required by 44 U.S.C. § 3101 to "prepare and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures and essential transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the government and of persons directly affected by the agency's activities." As a federal agency, TVA is responsible for ensuring that any information providing official documentation of TVA programs and activities is identified, maintained, stored, and disposed of as required by law.

TVA has two key practices and procedures that apply to records management:

- Communication Practice 6, Records and Document Management,<sup>2</sup> formally documents the establishment of TVA's records and document management program. Specifically, the program requires "appropriate records are acquired, maintained, distributed or preserved as directed by applicable federal laws, regulations and directives to preserve the history of the United States and TVA."
- Document Services Procedure 1, Records Management,<sup>3</sup> "establishes controls for managing records generated or collected for TVA activities."

According to Document Services Procedure 1, a TVA record "is any book, paper, map, photograph, machine readable material, or other documentary material, regardless of physical form, method of creation or characteristics, made or received by TVA which may be used as evidence of an organization's functions, policies, decisions, procedures, or operations." This procedure does not apply to nonrecord material; that is, an individual's work-related materials that were not circulated for formal approval, comment, or action; and which can be disposed of at the individual's discretion. Additionally, Information Services has work instructions which apply to records handling and the Electronic Document Management System (EDMS), which is TVA's electronic record repository.

The Vice President and Chief Information Officer, Information Services, is the designated records and documents management official for TVA and the primary sponsor for TVA's records and document management programs. The Electronic Document Management (EDM) group is part of Information Services. The Board

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<sup>1</sup> The National Archives and Records Administration is an independent federal agency, designated as America's national record keeper. The National Archives and Records Administration's mission is to ensure, for the citizen and the public servant, for the President, and for the Congress and the Courts, ready access to essential information.

<sup>2</sup> Communication Practice 6, Records and Document Management, superseded TVA Standard Policy and Procedure – 31.0, Record and Document Management Program.

<sup>3</sup> Document Services Procedure 1, Records Management, superseded TVA Standard Policy and Procedure – 31.1, Records Management.

of Directors has delegated oversight of TVA's records and information management responsibility to EDM.

EDM, in conjunction with Strategic Business Units (SBU), maintains TVA's Comprehensive Records Schedules (CRS) which document information on records for both TVA common records and SBU specific records. CRSs contain a listing of TVA records along with the corresponding disposition that has been approved by the National Archives and Records Administration. These dispositions are mandatory unless TVA requests a revision from the National Archives and Records Administration. Per the EDM Glossary, disposition is defined as "the actions taken with regard to records following their appraisal."<sup>4</sup> The actions include transfer to a records center for temporary storage, transfer to an archival agency, donation to an eligible repository, image reproduction, or destruction." EDM shall maintain a TVA Records Common CRS which documents information on records that are common to one or more TVA organizations. An organization's CRS shall be developed to categorize and manage identified records, meet minimum requirements established by the TVA CRS process, and be modified by EDM with input from the organization's Records Liaison.<sup>5</sup> According to Document Services Procedure 1, Records Management, the CRS "shall communicate a uniform, documented retention schedule, and ensure the final disposition of each record series is appropriate."

TVA's electronic records repository is EDMS. Records submitted to EDMS should be listed in a TVA CRS. An organization may use the Business Support Library<sup>6</sup> to automatically transfer electronic files into EDMS once the documents are finalized and become a record. EDMS is 12 years old and is no longer supported by the vendor. EDM management personnel told us that TVA plans to replace its current electronic document management system with a new one intended to increase the efficiency and effectiveness of records management. TVA has developed an Enterprise Content Management team that has issued a Request for Proposal for the new document management system to replace EDMS.

## **OBJECTIVES, SCOPE, AND METHODOLOGY**

This review was initiated at the request of the Chief Executive Officer. The objectives of our review were to determine (1) whether records are being maintained in accordance with TVA policies and procedures and (2) if opportunities exist to improve records retention and disposal activities in light of office space consolidation initiatives.

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<sup>4</sup> Appraisal is the process used to determine if records are temporary or permanent.

<sup>5</sup> The Records Liaison shall work with EDM to facilitate TVA's records management program within their organization, ensure compliance and consistency, coordinate recordkeeping activities, and schedule organizational records for retention or deposition.

<sup>6</sup> The Business Support Library, which is a document management system, stores nonrecord documents.

To achieve our objectives, we:

- Interviewed key TVA personnel including SBU Records Liaisons and EDM personnel to determine (1) how records are being maintained at TVA, (2) if prescribed policies and procedures are being followed, and (3) if opportunities exist to improve records retention and disposal.
- Performed walkdowns of the TVA Chattanooga, Nashville, and Knoxville Office Complexes to (1) identify and observe areas where hard-copy records are stored and (2) review the types of documents stored in selected areas.
- Reviewed TVA policies, procedures, and other applicable documents to determine what requirements apply to TVA records retention and management.
- Performed a walkdown of the EDMS site where hard-copy records are converted to electronic records and interviewed applicable EDMS personnel to determine (1) the process followed for conversion of hard-copy records, (2) whether a backlog of records exist, and (3) how hard-copy records are maintained and/or tracked while in the possession of EDM.
- Performed walkdowns of off-site records storage facilities including the Knoxville Records Center and the Federal Records Center in Ellenwood, Georgia, to (1) identify areas where hard-copy records are stored and (2) review the types of documents stored in selected areas.
- Judgmentally<sup>7</sup> selected records for review and assessed compliance with CRS provisions pertaining to document retention and disposition.

The scope of our review included the TVA Chattanooga, Nashville, and Knoxville Office Complexes' records. This review was conducted in accordance with the "Quality Standards for Inspections."

## **FINDINGS AND RECOMMENDATIONS**

During our review, we found TVA was in compliance with TVA records management policies, practices, and procedures. Records identified in sampling were maintained in accordance with the National Archives and Records Administration-approved record schedules. Specifically, we found TVA was in compliance with Communication Practice 6, Records and Document Management, in that a program has been developed and individual SBU CRSs have been created to document appropriate records retention. Additionally, we found that documentation shows compliance with Document Services Procedure 1, Records Management.

However, we did note some areas where compliance could be strengthened. While TVA's plans to replace its current electronic management system should increase the efficiency and effectiveness of records management, areas for

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<sup>7</sup> Sample was not chosen statistically and cannot be used to project results.

improvement exist in the Chattanooga Office Complex pertaining to (1) records management, (2) records retention, (3) disposal of records and material, (4) the identification of records, and (5) the maintenance and upkeep of office space.

## **COMPLIANCE WITH POLICIES AND PROCEDURES**

We found TVA was in compliance with Communication Practice 6, Records and Document Management. TVA has developed a records and document management program, and individual SBU CRSs have been created to document appropriate records retention. In addition, the documentation we reviewed shows compliance with Document Services Procedure 1, Records Management. Specifically:

- CRSs for organizational records were created, maintained, and modified by EDM with input from Records Liaisons as required. In addition, as required, a TVA Records Common CRS was maintained and modified by EDM for records that were common to one or more TVA organizations.
- Records Liaisons were complying with the annual self-assessment requirement. EDM and organizations are required to perform annual self-assessments which are to include a review of electronic and hard-copy records.

As noted above, we did identify some records management improvement opportunities. Specifically:

- CRSs could be updated/adjusted to reflect recent reorganizations in TVA to allow better utilization of records schedules. Currently, the records pertaining to an organization may be noted on multiple organizational records schedules. We were told by EDM personnel that they are working toward replacing organizational CRSs with flexible schedules.
- Interviews with Records Liaisons found there was confusion pertaining to what constitutes a self-assessment, and 5 of the 19 Records Liaisons interviewed stated they were not involved with annual self-assessments.

To further assess organizational application of the policies, we judgmentally sampled 62 items. In summary, we found no issues for 51 items:

- Twenty-three items were nonrecord material (i.e., working files, duplicate copies of TVA records, project files, and other items) where no record retention policies apply.
- Twenty-eight items were TVA records where (1) twenty-two were identified as TVA records within the respective retention period, (2) three were being kept while the minimum retention period had been met, and (3) three were assigned a designated discretionary retention period.

However, our review of the remaining 11 items found the identification and/or documentation of TVA records could be improved. Specifically, we identified four items that according to TVA personnel needed to be retained; however, this requirement to retain them could not be verified in the CRSs. We also identified seven other items that included reel-to-reel tapes marked for retention, but for which no one could identify the content, and files and boxes containing documents that could not be readily identified as record or nonrecord material.

## **OPPORTUNITIES TO IMPROVE RECORDS RETENTION AND DISPOSAL**

In addition to assessing compliance with TVA policies and procedures, we also looked more broadly at potential ways to improve records retention and disposal in light of TVA office space consolidation initiatives. We did identify some opportunities to improve records retention and disposal, specifically pertaining to the Chattanooga Office Complex. In the following pages, we discuss opportunities to improve hard-copy storage and retention and electronic storage. We also discuss various other observations.

### **Physical/Hard-Copy Storage and Retention**

During walkdowns with Records Liaisons and procedure and compliance testing, we found hard-copy records with long retention times maintained within the Chattanooga Office Complex. Depending on how frequently these records are used, they may be better maintained either electronically or in off-site storage. For example, we found a large volume of:

- Records pertaining to power plants and assets which are to be retained for the life of the asset and or agency. These records include vendor manuals, plant project maintenance records, engineering drawings, quality assurance records, and dam safety records. In some cases these records have been in existence since the 1930s. These records may not be needed for day-to-day operations or reference.
- Medical records with a retention time of 40 years after employee termination are maintained in hard-copy format only. It was noted that sprinklers are used for fire protection in the designated storage area for occupational health and safety medical records. These records are not backed up electronically and are the only existing copy. Additionally, x-rays are being stored in a nonclimate-controlled facility which could lead to degradation of the x-rays.

We also found nonrecord material is often kept beyond its useful life. Nonrecord material is not required to be retained for a specific time period and in some cases was explained as being current working files. Other non-record material was explained as being non-current working files or non-record material where the reason for retention could not be explained. In some cases, TVA personnel acknowledged that the documents could be disposed of but stated they had not had the time available to review filing areas and to determine which documents

should be kept. Specific examples of nonrecord material noted during walkdowns included:

- Franklin Covey planners dating back to 1993.
- Noncurrent meeting notes.
- Certificates of appreciation for current employees stacked in file cabinets.
- Copies of Financial Accounting Standards Board statements which are available on-line.

As discussed below, TVA did initiate a cleanup initiative which based on our observations during a subsequent walkdown<sup>8</sup> of the Chattanooga Office Complex reduced some of the nonrecord material.

For example, Figure 1 below shows Franklin Covey planners belonging to an employee found during our initial walkdown of the Chattanooga Office Complex. Figure 2 shows shelves that house only two empty Franklin Covey notebook folders for the same employee that were noted during our second walkdown.

**Figure 1**



**Figure 2**



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<sup>8</sup> A second walkdown was conducted after the initiatives began.

## Electronic Storage

On October 16, 2009, a request for proposal was issued by TVA's Enterprise Content Management Team to replace the current document management system which is EDMS. EDMS is currently 12 years old and is no longer supported by the vendor. TVA management acknowledges that the current document management system hampers records retention and disposal due to its limited capabilities and information technology structure. With its new system, TVA is looking to provide intuitive search and retrieval of content across the agency to improve user productivity. TVA has basically made "patches" to EDMS over recent years to meet some of the needs for electronic document management, however, further enhancements/maintenance are deemed as not a good business decision, and TVA is planning system replacement.

TVA employees acknowledged in interviews that a system viewed by employees as user-friendly may be utilized more than the current EDMS system. Employees stated document retrieval and searching could be more user-friendly if it were similar to Web-based search engines. While we found some SBUs dispose of hard-copy records when scanned into EDMS, other organizations often keep a duplicate hard copy. One SBU told us that it maintains approximately 200,000 hard-copy drawings, many of which are also entered into EDMS. SBUs are not disposing of hard-copy documents after conversion into electronic form due to a lack of confidence in EDMS and other difficulties. Specific reasons cited for maintaining a hard copy in addition to the electronic version included:

- Difficulty in searching and retrieving documents in EDMS. Many employees view the process of searching and retrieving documents in EDMS as cumbersome.
- Low confidence in the completeness of document searches. Employees are not confident that a search in EDMS would produce all relevant documents needed for working on a project or contract, whereas they are confident in hard-copy files.

In 2008, a significant backlog of records to be scanned into EDMS existed. Contributing factors to the backlog cited by the SBUs and EDM included (1) EDMS user-friendliness, (2) the volume of records, and (3) a lack of resources to scan all hard-copy records into electronic format. We were recently told by Records Liaisons and EDM personnel that while a backlog remains, it has been reduced. Some organizations have addressed the resource issue by hiring temporary or intern employees to scan and organize documents for EDMS.

## OTHER OBSERVATIONS

In addition to identifying records that possibly could be kept more efficiently off-site or in electronic format and determining that the TVA document management system hampers electronic record retention and disposal, we found:

- TVA personnel were unaware of the content of some boxes and files and had not yet evaluated contents for record or nonrecord status or existence in EDMS.
- Many Chattanooga work areas were cluttered and disorganized and contained unauthorized items.
- Unlocked filing cabinets containing employee personally identifiable information.

### Identification of Records

One of the key issues noted in our review was that in some cases Chattanooga TVA personnel were unaware of the content of boxes and files and had not yet evaluated contents for record or nonrecord status or inclusion in EDMS. For example, as noted in the finding related to compliance with policies and procedures, we noted specific instances where reel-to-reel tapes, files, and boxes of documents had not been evaluated for record storage, retention, and/or disposal. According to TVA personnel, the information belonged to former departmental employees. When an employee leaves TVA and/or the department, that employee's working documents are then transferred to another employee within the department. Review and identification of these documents was not a priority to the recipient.

We found during walkdowns of filing space and interviews with TVA Facility and SBU personnel that the Chattanooga Office Complex maintains a larger amount of filing space for record and non-record hard-copy documents when compared to the Knoxville and Nashville Office Complexes. We observed that the Nashville and Knoxville Office Complexes appeared more organized and less cluttered than the Chattanooga Office Complex. We did note that the Knoxville and Nashville offices have been consolidated within the last three to five years and have participated in cleanup initiatives. An initiative to clean up the Chattanooga Office Complex was initiated in December 2008, and while progress was initially being made, the Kingston Ash Spill impacted record and material identification, storage, and disposal initiatives.

### Cluttered and Disorganized Office Space and Unauthorized Items

In our original walkdown of the Chattanooga Office Complex, we found filing areas, storage areas, passageways, and work areas that were cluttered and disorganized. For example, in multiple hallways, we noted document-filled boxes on top of filing cabinets, on the floor, or along walls. However, in our subsequent walkdown, there appeared to be fewer boxes located on top of filing cabinets, on the floor, or along walls in passageways. We still noted many documents, files,

boxes of documents, and/or drawings piled in filing areas, empty cubicles, work spaces, and hallways. Examples of cluttered and/or disorganized areas include:

- An employee had approximately 40 boxes of personal working files stacked along a back hallway. The individual stated these files are retained in case he needs to answer questions on past projects, however, he also stated the working files are rarely used. In our subsequent walkdown, we noted the working files are rarely used. In our subsequent walkdown, we noted the boxes were still stacked along the same hallway. Figure 4 shows the boxes we noted during our initial walkdown in 2008. Figure 5 shows the same boxes noted during our second walkdown of the Chattanooga Office Complex.

**Figure 4**



**Figure 5**



- Boxes belonging to the Chief Financial Officer's organization that, according to personnel from the same organization, had been lined up against a hallway for approximately three years. See Figure 6 below from our second walkdown of the Chattanooga Office Complex.

**Figure 6**



- Cluttered workspaces such as the one shown in Figure 7 that raise questions about the identification, retention, and use of key records.

**Figure 7**



We were informed by Records Liaisons that Power System Operations, River Operations, and Fossil Engineering records had been consolidated since our review was initiated, and we found that this resulted in records storage improvement. Figures 8 and 9 are before and after pictures of the same area demonstrating the new office space that was the result of this consolidation. The records were scanned and/or consolidated into a smaller filing area along with Power System Operations and River Operations records.

**Figure 8**



**Figure 9**



In addition, during walkdowns of the Chattanooga Office Complex, hot plates, commercial coffee pots, and a full-size refrigerator were noted in cubicle areas. These items were addressed in a TVA Today article dated October 20, 2008. Facilities Management asked employees to remove unauthorized equipment and gadgets from workspaces for safety and energy conservation purposes. In discussion with Facilities Management, we noted that TVA is looking at placing kitchen areas throughout the Chattanooga Office Complex behind elevators enabling coffee pots, toasters, and other kitchen appliances to be moved. In addition, boxes and filing cabinets were located in hallways partially blocking walkways. According to Facilities Management, these items are fire code violations.

Figure 10 shows an illustration of the fire code violation that was noted in a walkdown of the Chattanooga Office Complex. Figure 11 shows a full-size refrigerator, microwave, and a hot plate that were noted during our walkdown.

**Figure 10**



**Figure 11**



**Figure 12**



Figure 12 above is an example of cluttered workspace that was noted in the Chattanooga Office Complex. According to a TVA employee, this area is used as an equipment library.

**Personally Identifiable Information**

During walkdowns of the Chattanooga Office Complex, filing cabinets containing employee personally identifiable information were found to be unlocked on more than one occasion. The information contained in a sample of three files included social security numbers, employee identification numbers, a copy of passport information, employee names, and employee addresses. According to TVA Communications Practice 1, TVA is to follow procedures designed to protect the personal privacy of its employees and other individuals on whom TVA maintains personal information by ensuring that adequate safeguards are provided to prevent misuse of personal information. Ensuring file cabinets with personally identifiable information are locked would be among the best practices for

protecting personal privacy. However, it was noted on two later occasions that these cabinets were locked.

## **RECOMMENDATIONS**

We recommend the Vice President and Chief Information Officer, Information Services, in conjunction with the Vice President of Facilities Management:

1. Continue current plans to replace EDMS with a new system that has more user-friendly search and retrieval functions.
2. Consider providing guidance on the format for retention of records, taking into account records retention times.
3. Implement further cleanup initiatives when feasible, including the identification, review, and proper disposition of unknown records and materials.
4. Re-emphasize the importance of safeguarding personally identifiable information.

**Management's Response** - The Vice President and Chief Information Officer, Information Services, in conjunction with the Vice President of Facilities Management, provided comments on a draft of this report and agreed with our recommendations and plan to take corrective actions. Corrective actions include:

- Continuing current plans to replace EDMS with a new system that has more user-friendly search and retrieval functions.
- Reviewing current guidance on the format for retention of records and making changes where appropriate.
- EDM working with Facilities to conduct periodic cleanups as soon as the Office of the General Counsel gives clearance for them to proceed.
- Updating communications and training on the importance of securing printed and electronic PII records.
- Identifying owners of unsecured printed records and implementing controls.

**Auditor's Response** - We concur with TVA management's actions or planned actions to address our recommendations.

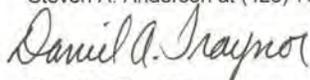
May 26, 2010

Robert E. Martin, ET 3C-K

**REQUEST FOR COMMENTS - DRAFT INSPECTION 2008-11829 - REVIEW OF  
TVA'S RECORDS RETENTION**

Please find attached our response to your request dated April 27, 2010 to provide comments for recommendations on the subject draft audit.

We appreciate the opportunity to work with Kristin S. Leach and Gregory C. Jaynes of your staff on this audit. If you have questions or wish to discuss further, please contact Steven A. Anderson at (423) 751-7243.

  
Daniel A. Traynor  
VP and Chief Information Officer  
Information Services  
SP 5A-C

  
Jeffrey T. Parsley  
Vice President  
Facilities Management  
EB 3G-C

SAA:SAS:LFM  
Attachment

cc (Attachment):

Steven A. Anderson, SP 5A-C  
Ricky L. Eason, EB 3E-C  
Peyton T. Hairston, Jr., WT 7B-K  
Mary E. Ragland, EB 5B-C  
Joyce L. Shaffer, WT 9B-K  
John M. Thomas III, MR 3S 120-C  
OIG File No. 2008-11829

Inspection 2008-11829 - Review of TVA's Records Retention-EDM

Recommended Action Step	Management Agrees	Responsible Department	Action Planned	Estimated Completion
1. Continue current plans to replace EDMS with a new system that has more user-friendly search and retrieval functions.	Management Agrees	IS	An RFP was issued in October 2009 for an Enterprise Content Management (ECM) system to replace EDMS. The responses were evaluated by the ECM team and a recommendation for award was made to senior IS management in April 2010. The project is being presented to the Strategy and External Relations Council in early June, and Supply Chain is negotiating terms and conditions with the designated vendor, but no contract has been signed yet. The timeline calls for the project design to begin as soon as the contract is awarded, and phased implementation will go through the end of FY13.	12/31/2013
2. Consider providing guidance on the format for retention of records, taking into account records retention times.	Management Agrees	IS	Records Management will review the current guidance on the format for retention of records and make changes where appropriate.	11/30/2010
3. Implement further cleanup initiatives when feasible, including the identification, review, and proper disposition of unknown records and materials.	Management Agrees	IS and Facilities	EDM will work with Facilities to conduct periodic cleanups as soon as the OGC gives us clearance to proceed.	Undetermined
4. Re-emphasize the importance of safeguarding personally identifiable information.	Management Agrees	IS	Response from the 2009-12650 Use and Protection of PII  A. Update communications and training on the importance of securing printed and electronic PII records.	11/30/2010
		IS and record owners	B. Identify owners of unsecured printed records and implement controls.	10/31/2010