Records Accountability and Control for Proof of Compliance

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Let's start off with the bottom line: "No records – no proof of compliance!" A verbal/written affirmation that compliance exists (like a "Yes" response to any CI/SAV/SUI Worksheet question) is only the prelude to determining compliance. Remember – it's always TRUST BUT VERIFY followed by (if necessary) SHOW ME for each and every applicable record.

Missing records – lost, unaccounted for, or never retained – has been identified in the Discrepancy Tracking System (DTS) as the leading direct cause of REPEAT Discrepancies in the past and continues to be the direct cause of far too many discrepancies generated during inspections in the present. And what is even worse – the one record that identifies all of the unit's records (File Plan) is frequently nowhere to be found. This indicates a major deficiency in records accountability and control.

WHO is primarily responsible for records accountability and control? Answer: The unit's DA - Director of Administration (at the region/wing level) or Administrative Officer (below wing level). Their responsibility is to implement, supervise and ensure compliance to CAPR 10-2, Files Maintenance and Records Disposition. This duty position - typically considered of minor consequence/importance - is in reality the most critical duty position when it comes to compliance!

CAPR 10-2 starts off by stating "The primary intention of this regulation is implementation of a simple method of making information available when and where needed." It is not the intention of the OPR (CAP NHQ/DA) to make this a difficult task for units at any level to accomplish. The regulation reflects a "keep-it-simple" approach by including the flexibility for units to arrange files and records in a manner that best suits their needs.

It is unfortunate that CAPR 10-2 Figure 1 (Example File Plan) and Figure 5 (Example Computer File Folders) only shows the Administrative section of the plan. The complete plan consists of the applicable files/records listing from all departments as detailed in Attachment 1 Tables 1-12. However, the completed File Plan for most units can be as simple as it is portrayed in the regulation, capturing all of the unit's records (by record name/title under folder name) from various departments in one document, typically 1-2 pages in length. The partial example File Plans shown were purposely made generic, as they attempt to accommodate all organizational levels in CAP. Each unit is required to develop a tailored File Plan specifically based on the actual records they are required (and additionally choose) to maintain.

It is important that Region/Wing IGs stress to wing/unit staffs regarding the criticality of records accountability, control and management – accomplished in the easiest manner possible – so that it results in the timely retrieval of records for review and inspection. Having stated that, the following 10-step process can help wing and subordinate unit DAs accomplish this with a "keep-it-simple" approach to developing a File Plan leading to the control and accountability of all records supporting compliance:

1. Understand the difference between records and supplemental materials/reports. At a minimum, records supporting compliance are required to be documented in the File Plan.

2. Identify all of the records that currently exist, WHO has them, WHERE they are located and WHAT type of record it is (paper, electronic). This will most likely involve having the DA get with each current Staff Officer (and possibly previous Staff Officers if recent or high turnover has occurred) and accomplish a "hands-on/eyes-on" accountability exercise.

3. Identify all of the applicable unit records whose retention is required. This is best accomplished by each current Staff Officer (using the divide and conquer approach) reviewing their applicable CAP Regulation(s) and noting the documented record requirement(s). The CI/SAV/SUI Worksheets can also be reviewed for records call-out of mission-critical compliance items.

4. Accomplish a "gap analysis," i.e., compare the required records list against the actual records list. Take action to find missing records or start maintaining the record(s) determined to be missing/lost. NOTE: If records are missing, that is an issue (albeit after-the-fact/reactive) for the Unit Commander to address with his/her staff.

5. Arrange the records that the squadron chooses to maintain (required records as a minimum) in the manner that best suits the squadron. There is no right or wrong arrangement, but it should be a simple setup. CI/SAV/SUI observations CAP-wide found that the typical arrangement was by office/department/functional area.

6. Take the required records listing (reflecting the chosen arrangement), identify the record OPR and record location(s) and put it in the File Plan. NOTE: The File Plan "template" shown in CAPR 10-2 Figures 1 and 5 are just examples. It does not necessarily have to be done that way, but it does provide the simplest approach for addressing format.

7. NOW look at CAPR 10-2 Attachment 1, Tables 1 through 8, and find the record retention and cut-off requirements. Add these to the File Plan for each record.

8. For electronic records controlled/maintained via computer storage, identify the back-up process: WHO accomplishes it, WHEN it is accomplished (frequency), WHAT back-up storage device is used and WHERE it is located/kept. Add this to the File Plan.

9. Provide a copy of the completed File Plan (or a link to its location) to each Staff Officer. This also aids Staff Officers who hold multiple duty positions other than their Primary Duty Position.

10. Review the File Plan for currency/accuracy at least annually or more frequently based on regulation change(s) and/or Duty Position assignment turnover rate. Update as necessary.

The accomplishment of the last step is SUPER CRITICAL for DAs to ensure that records continue to be controlled and accounted for on an ongoing basis. This step becomes even more critical to accomplish when Offices/OPRs are allowed to maintain their own File Plan per CAPR 10-2 para 2b. DAs must address/manage this known risk and also ensure that:

- The Office/OPR forwards a copy of their File Plan (and any subsequent updates) to the DA (also required by CAPR 10-2 para 2b),
- The Office/OPR File Plan be reviewed and verified by the DA as meeting the requirements of CAPR 10-2 and
- Add/append these copies to the main Unit File Plan.

Records accountability and control is at the heart of a CAP unit seeking to prove compliance. The demonstration of compliance indicates an assurance that the unit is capable of accomplishing CAP's missions – and that is the bottom line for the organization!