

FTCP Issue Paper

Establishment of Record Keeping Requirements

DOCUMENT NUMBER: FTCP-09-003

PROBLEM:

Records Definition: What constitutes a participant's record of qualification in a Technical Qualification Program (TQP)?

Records Retention: Who is responsible to maintain the record of qualification and for how long?

Records Transportability: What records associated with a participant's qualification in TQP must be transferrable to another organization within DOE for validation of qualification?

BACKGROUND:

DOE M 426.1-1A, *Federal Technical Capability Manual*, identifies Demonstration of Competence, Transportability, and Measureable as key principles for all TQPs. These principles drive the need for a reasonable, yet rigorous, qualification records management process that addresses records retention, transportability, and retention or disposition.

The role of records management in any organization is to support management decisions. In line with the primary objective of the FTCP—recruit, deploy, develop, and retain Federal personnel with the necessary technical capabilities—the objective of the records management process for the Technical Qualification Program must support management decisions with regard to necessary technical capabilities of Federal personnel for development and deployment. This is consistent with the definition of “Records” from DOE G 414.1-2A, *Quality Assurance Management System Guide*, dated 6-17-05.

DOE Administrative Records Schedule 1: Personnel Records (June 2007, Revision 2) addresses retention or disposition of TQP participant training records based on the fact that training records are considered personnel records.

Certain portions of TQP participant training records must be maintained comparably throughout DOE to assist in the validation of qualification in cases of TQP participant transfer, detail assignment, or evaluation to perform ISM Verifications, Operational Readiness Reviews, etc. DOE M 426.1-1A, Section III.2.b, “Transportability,” explains the requirement for all participants to complete the General Technical Base Qualification Standard (GTBQS) and Functional Area Qualification Standards (FAQS) without modification for the ease of transportability. Using this as a basis, all TQP participant records associated with the GTBQS and FAQS should be maintained in the same fashion throughout DOE. Records associated with the competencies specific to the position, facility, program or office are not subject to this requirement.

PROPOSED RESOLUTION: (Previously submitted to the FTCP)

Designate the following records as minimum record requirements for validation of TQP qualification to a specific functional area qualification standard:

- Completed qualification card for all competencies of the General Technical Base Qualification Standard (active version at time qualification process began).
 - Required for transportability
- Completed qualification card for all competencies of the Functional Area Qualification Standard (active version at time qualification process began)
 - Required for transportability
- Completed qualification card for appropriate competencies related to assigned position (as determined by position description and supervisor requirements)
 - Not required for transportability

TQP training records must be retained by the office of generation while active and then must be transferred to the Federal Records Center where destruction is authorized after 75 years.

DISSENTING OPINION(S):

During a recent survey of the FTCP, the following explanation of what constitutes a Qualification Record was presented for comment:

“Technical Qualification Program participant training records must include, for the most recently completed TQP position qualification: a copy of each qualification standard to which the participant is qualified (General Technical, Technical Discipline, and Position Knowledge – as applicable) and a copy of each completed, associated qualification card, with all required qualifying official and supervisory signatures.”

Some responses concurred with the explanation. Many stated the requirement to maintain the qualification standards with the individual qualification records was not necessary because the standards are maintained through a separate process. Others stated that the explanation should also include additional qualification data such as: qualification exams completed, completed oral board documentation, completed remediation programs and objective evidence for documenting equivalencies.

After review of the survey results concerning this issue, it is acknowledged that TQP participant training records should include (if applicable), completed qualification exam results (written and/or oral), completed oral board documentation, completed remediation programs, and objective evidence for documenting equivalencies.

It is argued that maintaining a copy of the standard with the official copy of the records would assure clear transportability, as well as facilitate easier re-qualification and cross-qualification efforts (allow for easier competency-level cross-walk between qualification standards).

DECISION:

Records Definition:

The minimum constitution of a TQP participant’s official training record for each capability (FAQS) to which the participant is currently qualified is as follows:

- Completed qualification card for all competencies of the General Technical Base Qualification Standard (active version at time qualification process began)
- Completed qualification card for all competencies of the Functional Area Qualification Standard (active version at time qualification process began)
- Completed qualification card for appropriate competencies related to assigned position (as determined by position description and/or supervisor requirements)
- The following documentation as utilized in the qualification process:
 - Results of qualification exams and oral boards
 - documentation of completed remediation programs
 - objective evidence for documenting equivalencies associated with the current qualification

Organizations may use one qualification card to record completion of all assigned qualification standards. For participants that are qualified to multiple capabilities (FAQS), only one copy of the participant's completed GTB qualification card is necessary. Official records do not include actual exams, to prevent compromise of exam questions.

Records Retention:

TQP participant training records must be retained by the organization for which the participant is currently performing TQP-related duties while the records are active. Training records should then be handled according to DOE Administrative Records Schedule 1: Personnel Records, Revision 2, item 29.b. Exactly where the official copy of the records is maintained within, the organization (i.e. centrally or with the TQP participant) is at the discretion of the organization but must be stated in the organization's TQP plan or procedure.

Records Transportability:

Record items associated with the GTBQS and FAQS of each TQP participant's official training record for each capability (FAQS) to which the participant is currently qualified must meet the requirements explained above (Records Definition) to be transportable.

DISPOSTION:

Approved

SIGNATURE:

DATE:

Karen L. Boardman

11.12.09

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