

Frequently Asked Questions of Individual GRS Schedules ***June 2023***

GRS 1.1, Financial Management and Reporting Records

QUESTIONS RELATED TO GRS 1.1, ITEMS 010 AND 011

1. My agency has scheduled accountable officers' and similar financial records for a 7-year retention period. Which takes precedence: my agency's 7-year retention period or the GRS 6-year retention period?

The GRS takes precedence because it supersedes an agency schedule authority. However, because GRS 1.1, item 010, has a flexible retention period (destroy 6 years after final payment or cancellation, but longer retention is authorized if required for business use), your agency can use either the GRS 6-year retention period or keep the 7-year retention period (or even longer). However, you must cite the GRS item as the authority for whichever retention period you use, not the superseded agency schedule.

2. If I scan paper travel receipts into an e-system as voucher attachments, can I destroy the original paper?

Yes, as long as you meet both of the following prerequisites. First, your agency must identify the e-system as the repository for vouchers available for audit by the Government Accountability Office (GAO). Your agency must retain the records in this e-system for 6 years, per GRS 1.1, item 010. Second, the scanned image must contain everything available in the original paper. GAO states, "There shouldn't be anything on the paper that isn't reflected in the electronic version."¹ If these two conditions are met, the original paper travel receipts may, after the scanned image is verified to contain all information in the original, be destroyed per GRS 5.2, item 020.

3. Why is item 010 followed by an item (011) for "all other copies" but none of the other items have a similar all-other-copies counterpart?

Copies of records in item 010 are likely to produce extra copies retained in other business units for separate business purposes. For instance, a purchase order may exist in multiple copies not only where it is held for financial audit but also in accounts payable, shipping and receiving, and other offices. These are not non-record copies held for convenience, but records retained for specific and unique business purposes. Because the record copy is retained for the primary purpose of audit, other copies can be disposed of when their business use ceases. Copies of records covered by other items in this schedule are more likely to be held simply for convenience. They serve no unique business purpose, are therefore non-record by definition, and do not need to be scheduled.

4. Why are travel and transportation records intermingled with financial management records in items 010 and 011?

While the logistics of arranging for travel and transportation may be a distinct business process, at root many of these records document paying money in exchange for services. Agencies retain them primarily to enable financial audit. That is why they co-exist in items 010 and 011, which cover a wide range of

¹ This statement was made by a GAO representative to NARA's GRS Team on January 24, 2017.

financial transaction records.

QUESTIONS RELATED TO GRS 1.1, ITEM 012

5. Does this item cover all unsolicited and all unaccepted bids?

No. This item covers only bids that are *both* unsolicited *and* unaccepted. These bids have a much shorter retention period than bids that are unsolicited but accepted or solicited but unaccepted. (Item 010 of this schedule addresses both these latter types of bids.) Any accepted bids have obvious business and legal value documenting a contract, and any solicited bids have further value if there are legal challenges to the contract award. Bids that agencies neither solicit nor accept do not fulfill continuing business purposes and agencies thus do not need to retain them for long.

6. Does this item’s disposition mesh with the Federal Acquisition Regulation (FAR)?

Yes. The FAR Implementation Team, which drafted the update to the FAR published in the *Federal Register* on December 4, 2015, requested that we add this item. The FAR update contains directions to dispose of these materials “in accordance with agency procedures” (80 FR 75913). That instruction is consistent with this item’s disposition to destroy “when no longer required for business use.”

QUESTION RELATED TO GRS 1.1, ITEM 020

7. Item 020 is for background materials used to prepare an annual agency financial statement. Why isn’t there an item for the agency financial statements themselves?

Agency financial statements are scheduled under GRS 5.7, item 050, “Mandatory reports to external Federal entities regarding administrative matters.”

8. Does this item cover records of all audits?

This item covers records of an agency’s audits of its annual financial statement—the assessment of its assets’ market value. It does not cover records of other financial or non-financial audits.

QUESTION RELATED TO GRS 1.1, ITEM 030

9. Besides being included in item 030, purchase orders, contracts, and invoices also appear in item 010. How can I tell which item is the correct one for my records?

Purchase orders, contracts, and invoices appear in item 010 when they document financial transactions subject to audit to ensure that government spends its resources appropriately and within the confines of the law. *Some* of those purchase orders, contracts and invoices serve as a baseline to document agency investment in “property, plant and equipment” (PP&E) assets, and these are the subject of item 030.

Determining the value of PP&E assets involves knowing the original purchase price and the rate of amortization over the course of years. Many assets eventually wear out and are removed from inventory, while others (such as real estate and structures) may have a usable life of many decades or remain in government ownership to the end of the republic.

The same records may exist in both the financial management and the PP&E asset accounting offices. They are scheduled differently based on the business purpose the records serve in each office. Their retention period is 6 years in item 010 to ensure their availability for financial audit. But their retention period in item 030 may be for many decades. For this reason, it is advisable that duplicates of purchase orders, contracts, and invoices concerning PP&E assets be supplied to that office for inclusion in the files documenting those assets that are covered by item 030.

GRS 1.2, Grant and Cooperative Agreement Records

1. What is the difference between a grant, a cooperative agreement, and a contract in the context of this schedule?

A grant is an award of financial assistance in the form of money, or property in lieu of money, by the Federal government to an eligible grantee. The principle purpose of a grant is to transfer a thing of value from a Federal agency to a state or local government or other recipient to carry out a public purpose of support or stimulation authorized by Federal statute (31 U.S.C. 6304). A cooperative agreement is an award of financial assistance that is used to enter into the same kind of relationship as a grant, but differs from a grant in that it provides for substantial involvement between the grant-making Federal agency and the award recipient to carry out the activity contemplated by the award (31 U.S.C. 6305). Contracts are used to acquire property or services for the direct benefit or use of the Federal government.

QUESTIONS ABOUT RECORDS NOT COVERED BY GRS 1.2

2. Why does this schedule not cover Government-wide systems such as GRANTS.GOV, GRANTSOLUTIONS.GOV, and USASPENDING.GOV?

GRANTS.GOV is owned by the Department of Health and Human Services (HHS). HHS has scheduled the web version of material posted there by other agencies as temporary, assuming agencies manage that content as records in their own records-management environments. The web version has the unique and sole business purpose of making grant information available to the public for a relatively short period of time.

GRANTSOLUTIONS.GOV is also owned by HHS and managed by the Administration for Children and Families (ACF) within HHS, in partnership with the Denali Commission. Its business purpose is to provide grants management products and support to Federal grant-making agencies. ACF has scheduled the GRANTSOLUTION.GOV database and web portal as temporary. Agencies are responsible for managing the content they post and output they receive as records in their own records management environments.

USASPENDING.GOV is owned by the Office of Management and Budget (OMB). Although it contains copies of records posted by other agencies, the records OMB collects in this system combine to create a new business purpose, different from the business purpose for which the individual records exist at the creating agency. OMB is responsible for scheduling that unique totality of records in USASPENDING.GOV.

3. Why does this schedule not cover Service Level Agreements?

A Service Level Agreement (SLA) is an agreement between a customer (the agency, in this context) and a service provider that describes the service, documents service level performance targets, establishes incentives for meeting performance targets, clarifies the responsibilities of both the service provider and

the customer, delineates how they will discover and handle disputes, and specifies how they will remedy performance failures. The process of executing an SLA is a commercial transaction between a customer and a service provider. The services described in an SLA are paid for by the agency. However, unlike a grant or cooperative agreement, an SLA is not a funding or obligation document. For this reason, we do not include SLAs under this schedule.

4. Why does this schedule not cover inter-agency agreements?

An inter-agency agreement (IAA) is a written agreement between two Federal agencies, or major organizational units within an agency, that establishes a reimbursable order for goods or services. Unlike grants and cooperative agreements as defined in this schedule, IAAs are between co-equal partners. For this reason, we do not include IAAs under this schedule. GRS 1.1, item 010, covers IAAs for goods or services.

QUESTIONS RELATED TO GRS 1.2, ITEM 020

5. Why does the GRS include successful applications?

We have determined, based on data and experience with requests for grant case files in our holdings, that these records do not generally warrant permanent retention. They are often quite voluminous, contain little information of significance, and attract little research attention. If an agency believes it has grant case files of historical value it can submit a schedule for those records to NARA.

6. Why do successful grant and cooperative agreement application case files have a 10-year retention period?

The 10-year retention period aligns with the 10-year statute of limitations in the False Claims Act (31 U.S.C. 3731(b)), which governs claims related to these records.

QUESTION RELATED TO GRS 1.2, ITEM 022

7. Why is there an “all other copies” item for Grant and Cooperative Agreement Case Files, but none of the other items have a similar catch-all item?

Other business units may retain extra copies of these case files for separate business purposes. These extra copies are therefore *not* non-record copies and must be scheduled. Extra copies of records covered by other items in this schedule are more likely to be held simply for convenience, making them non-record copies by definition.

QUESTION RELATED TO GRS 1.2, ITEM 030

8. Why are final products or deliverables scheduled as temporary records?

We have determined, based on research into how agencies have scheduled these records and experience with requests for these records in our holdings, that they do not generally warrant permanent retention. If an agency believes its grant or cooperative agreement products or deliverables do warrant permanent retention by the National Archives, it can submit a request to deviate from the GRS with a proposed agency-specific schedule.

GRS 1.3, Budgeting Records

QUESTIONS RELATED TO GRS 1.3, ITEM 010

1. In the past, NARA instructed agencies to schedule these records individually. Why do you now include them in the GRS?

The Office of Management and Budget (OMB) collects final budget submissions from nearly all agencies in one place. OMB schedule DAA-0051-2015-0001, signed by the Archivist on August 3, 2017, authorizes permanent transfer to NARA of these Government-wide records from that single source. As a result, records at all other agencies (except those mentioned in question 1.3/4) are now scheduled as temporary under item 010 and agencies no longer need to individually schedule them starting with FY 2017 records. The item is not retroactive because OMB was not able to confirm that it held complete sets of prior fiscal year budget submissions for the entire Federal Government.

2. My agency already scheduled its budget formulation, estimate, justification, and submission records independently. Does this schedule supersede my agency's schedule?

Yes and no. This schedule supersedes your agency schedule for records FY 2017 and forward, but your schedule should still be used for records FY 2016 and prior.

3. My agency has not scheduled these records independently. Can this GRS just cover my records for prior years as well?

No. If your agency never scheduled these records, FY 2016 and prior records remain unscheduled.

4. Why do you exclude some agencies from using this item?

A very few agencies have authority to bypass OMB and submit their budget requests directly to Congress. Since NARA cannot accession these agencies' budget submissions from OMB, such agencies are excluded from using this item. Records officers should consult internally with their general counsel and chief financial officer to determine if their agency falls into this category under OMB Circular A-11 or A-19.

QUESTION RELATED TO GRS 1.3, ITEMS 010 AND 020

5. Items 010 and 020 have the same retention period. Why are they not just one item?

The items are separate because their associated work processes are separate. In particular, they do not happen concurrently, but rather one after the other. Records under item 010 are created in the process of putting a draft budget together and submitting it to OMB. Records under item 020 are created over the course of expending appropriations.

QUESTION RELATED TO GRS 1.3, ITEMS 030 AND 031

6. The difference in retention between these two items is negligible. Why not merge them and keep everything for 5 years?

Item 031 material, retained for 3 years, is largely composed of quarterly reports. Not only are they voluminous, but they build on one another, compiling data year-to-date. The amount of material that accumulates in 031 is three times that found in 030, and the smaller volume in 030 incorporates the most important information found in the larger set of records. Both items' retention statements include flexibility to retain longer if records are required for business use, so agencies desiring to maintain all reports as a single unit can do so. Agencies seeking a more robust disposal of no-longer-necessary and duplicative records will find item 031 useful.

QUESTION RELATED TO GRS 1.3, ITEMS 040 AND 041

7. Why are these items separate? Their retention periods are almost identical.

All records in both items are created in local offices, divisions, or programs within an agency. They are separate items because the records' owners—formally established budget offices (040) and other offices (041)—use them for different business purposes. A budget office compiles records from all local offices to formulate the budget request for an entire agency; local offices manage only records relating to the office's own financial footprint. The items' retention period are not precisely identical. Item 040 retains records for 2 years after a budget is approved. Item 041 records can be destroyed when 2 years old, regardless of when the budget is approved.

Human Resources Schedules (GRS 2.1—2.8)

1. Do General Records Schedules for human resources records (section 2.0) apply to the records of personnel on staff solely as part of a detail or an Intergovernmental Personnel Agreement (IPA)?

Yes. Items in schedules 2.1 through 2.8 apply to records your agency creates as part of managing personnel on the Federal payroll. This includes those temporarily assigned to your agency on a detail or through an IPA, as well as those permanently assigned to your agency.

GRS 2.1, Employee Acquisition Records

1. Does GRS 2.1 supersede the disposition instructions in the “Delegated Examining Operations Handbook: A Guide for Federal Agency Examining Offices (May 2007), Appendix C,” published by the Office of Personnel Management (OPM)?

Yes. “Delegated Examining Operations Handbook: A Guide for Federal Agency Examining Offices” covers in detail how agencies with authority to hire employees, as delegated from the Office of Personnel Management, are to carry out this function. Appendix C is the schedule for records created in that process. Appendix C derives from GRS 1, items 33a through 33t. All but two items in GRS 1 are superseded (and the other two are rescinded) by new GRS 2.1. As these GRS 1 items are now superseded by GRS 2.1, GRS 2.1 supersedes Appendix C. See crosswalk for details.

QUESTION RELATED TO GRS 2.1, ITEM 010

2. Why doesn't this item cover OPM records?

OPM, as part of its mission, prepares the majority of classification standards applicable to positions in individual agencies, multiple agencies, and the entire Federal Government. These case files are permanent (NC1-146-84-1, item 1a). Item 010 covers the corresponding case file at an agency seeking

to create a new classification standard specific to itself, a few agencies, or in rare cases, the entire Government. These are administrative files at all agencies other than OPM and it is therefore appropriate to include them in the GRS. The corresponding OPM files are, however, unique to OPM's mission. OPM must therefore must schedule them on an agency-specific schedule.

QUESTION RELATED TO GRS 2.1, ITEM 021

3. Why doesn't this item have a disposition authority?

This item is not an independent disposition authority because the records are filed in places already covered by other disposition authorities, such as that covering the employee's official personnel file. Users must go to those other authorities to learn when to destroy records.

QUESTION RELATED TO GRS 2.1, ITEM 022

4. This item includes "other copies" of records described in item 020. Why is it necessary to include such an item for "other copies"?

Various offices in an agency might develop case files for position descriptions (PDs), most notably the program office where the position will exist. Once the PD is final, its official record resides with the agency Human Resources function and is covered by item 020. Item 022 covers background material created by any office in the course of building a PD, and also convenience copies of final PDs held by offices to document their own positions.

QUESTIONS RELATED TO GRS 2.1, ITEM 030

5. What is a classification appeal?

An employee who believes his or her position description is inappropriately graded or no longer reflects its actual responsibilities may file a classification appeal seeking to alter the grade or description. Only an employee can originate an appeal; an agency cannot appeal a classification to OPM. The appeal may be made either to an agency's HR function or directly to OPM. In either event, the agency creates a case file to track the appeal's progress and OPM's final decision.

6. Why are OPM records not covered by this item?

Position classification, as discussed in the answer to question 9, is part of OPM's mission. Therefore, records of OPM's involvement in appeal and review case files are also not appropriate for the GRS and are instead scheduled on an OPM-specific records schedule.

QUESTIONS RELATED TO GRS 2.1, ITEM 040

7. Why is the classification certificate not combined with the classification appeal file (item 030) in a single item?

A classification certificate is the document closing an appeal of a position classification. While it is arguably the conclusion of the appeal file, it takes on new life as integral documentation of a position's classification. As such, it must be retained as long as the PD is active, which may be for many years. The

rest of the appeal file (item 030) is material documenting how the final decision was reached. These background records do not need to be retained as long as the certificate itself.

8. Why are OPM records not covered by this item?

Position classification, as discussed in the answer to question 9, is part of OPM’s mission. Certificates received by agencies regarding their own positions document classification activities that take place in all agencies across Government; as such, it is appropriate to include them in the GRS. The certificates retained by OPM are OPM-specific records documenting the agency carrying out its mission, and must be covered by an OPM-specific schedule.

QUESTION RELATED TO GRS 2.1, ITEMS 050 AND 051

9. Why do these items not authorize longer retention if required for business use?

The regulation governing these records (5 CFR 335.103) requires agencies to retain them for 2 years or until after formal program evaluation by OPM, whichever occurs first. We chose a blanket 2-year retention period—the outside limit required by the regulation—for ease of implementation. There is no express provision in the regulation for longer retention, and agencies may find that longer retention opens them to liability.

QUESTION RELATED TO GRS 2.1, ITEM 060

10. Why does this item not authorize longer retention if required for business use?

Item 060 does not authorize longer retention because the online site USAJobs enforces a strict policy of applications self-destructing one year from the day of submission. Also, risk is increased if job vacancy case files (items 050 and 051) are destroyed as required by law but duplicates of records are retained longer by other offices under item 060.

QUESTION RELATED TO GRS 2.1, ITEM 090

11. How can I know when the clock starts ticking on destruction of these records? When does right to appeal a non-selection expire?

According to 5 CFR 300.104, each agency can set its own time limit for filing appeals. Check with your agency General Counsel. It is important to retain these records until the time specified in the disposition instruction to protect both the right of a non-selectee to appeal the decision and to protect your agency in justifying its selection.

QUESTION RELATED TO GRS 2.1, ITEMS 100, 101, AND 102

12. Why do these items exclude Presidential appointment records?

Records documenting Presidential appointments are often high-profile and a subject of great interest to the research community. Since we cannot state that these records are always temporary or always permanent across the entire Government, we cannot include them in the GRS. Each agency must schedule its records on Presidential appointments on an agency-specific records schedule.

QUESTION RELATED TO GRS 2.1, ITEMS 120 AND 130

13. What specific programs are covered under special hiring authority?

Exact names of special programs may vary from year to year. The current list is available at <https://www.opm.gov/policy-data-oversight/hiring-information/hiring-authorities/>, the section at the bottom of the page entitled “Special Employment Programs.” In general, these are temporary hiring authorities and often seasonal. A good example is student summer-hire programs.

QUESTION RELATED TO GRS 2.1, ITEMS 140 AND 141

14. Why don’t these items have a disposition authority?

The disposition instruction for both these items directs the user to forward the records elsewhere. The user is not given authority to destroy records. These records are ultimately incorporated into other records series scheduled under other authorities.

QUESTION RELATED TO GRS 2.1, ITEMS 150 AND 160

15. Why don’t these items cover OPM’s records?

OPM has authority for hiring Federal employees. It may delegate this authority under 5 U.S.C. § 1104 to heads of other agencies; this delegation makes it possible for other agencies to post job openings and interview and hire employees. These activities are administrative at all agencies other than OPM. Since hiring Federal employees is an OPM mission function, it must schedule its copies of these records separately.

GRS 2.2, Employee Management Records

QUESTIONS RELATED TO GRS 2.2, ITEM 020

1. What is succession planning?

OPM [defines](#) succession planning as the “process where organizations identify those positions considered to be at the core of the organization—too critical to be left vacant or filled by any but the best qualified persons—and then creating a strategic plan to fill them with experienced and capable employees.” 5 U.S.C. 412. 201 requires the head of each agency, in consultation with OPM, to establish a management succession program.

2. Why do you exclude records maintained by executives responsible for policy formulation or other high-level actions from this item? How do I schedule these records?

Records documenting executive-level decisions and actions are often considered permanent records. Therefore, agencies should submit agency-specific schedules for these records.

QUESTION RELATED TO GRS 2.2, ITEM 030

3. Why do records of Department-level awards require agency-specific schedules?

Department-level awards are often awarded for distinguished or meritorious service. As such, such awards are high-profile and records documenting them are potentially of great interest to the research community. Since we cannot state that these records are always temporary or always permanent across the entire Federal Government, we cannot include them in the GRS. Each agency must schedule its records for Department-level awards on an agency-specific records schedule.

QUESTIONS RELATED TO GRS 2.2, ITEM 040

4. Why did you exclude Official Personnel Folders (OPFs) for employees who separated prior to December 31, 1973, from this item? Who is responsible for scheduling these older OPFs?

GRS 2.2 does not provide disposition authority for pre-1973 Official Personnel Folders (OPFs) because their value has not been decided. NARA has determined that it is the responsibility of OPM to schedule these records, given that OPM is the owner of the records subject to OPM recordkeeping requirements. Agencies may have physical possession (custody) of such records, but they do not schedule them.

5. Why is item 040's retention period so long?

OPM relies on long-term Official Personnel Folders (OPFs) as a supplemental source of documentation when making decisions about retirement benefits, death benefits, and survivor benefits payable to annuitants and beneficiaries. The 129-year retention period comes from 5 U.S.C. 8466, which allows an employee to seek benefits based on Federal service through 115 years old, or a beneficiary to seek benefits up to 30 years from the event which entitled them to the benefits (death of the employee). If we assume a person could not be an employee at younger than 16 years old, and may seek their benefits until they are 115 years old, then the person's OPF records could be up to 99 years old. It is possible for a beneficiary to seek benefits for an additional 30 years under the statute. Thus, the 129-year disposition.

QUESTIONS RELATED TO GRS 2.2, ITEMS 040 AND 041

6. Why do items 040 and 041 still refer to hardcopy Official Personnel Folders (OPFs)? Hasn't the entire Government adopted the eOPF system as of 2014?

No, some agencies continue to maintain OPFs in hardcopy and have not migrated to eOPF. As a result, we left the reference to hardcopies in these items.

7. Why do you exclude agencies not subject to OPM recordkeeping requirements under title 5, U.S. Code, from Items 040 and 041?

We excluded agencies not subject to OPM recordkeeping requirements from using this schedule for three important reasons. First, this GRS conforms to OPM recordkeeping requirements, and OPM has the authority to establish requirements only on those records created under its oversight. Second, while it is tempting to assign the same legal minimum retention period to all other personnel folders as well, this is best determined, when possible, by each agency for itself. Agencies not subject to OPM recordkeeping requirements either operate their own employment systems or participate in another agency's employment system. Employees under these different systems may be paid under a different pay plan, have different rights to appeal and file grievances, or accrue time towards retirement differently from employees under OPM's employment system. Third, we established a legal minimum retention period of 129 years for the OPFs covered under item 040. We would not want to impose such

a long retention period on other agency personnel folders when we know their retirement systems are different and they may not need the records as long.

QUESTION RELATED TO GRS 2.2, ITEM 070

8. Why does the GRS not cover performance records of Presidential appointees? How do I schedule these records?

Presidential appointees are often high-profile and a subject of great interest to the research community. Since we cannot state that records documenting their service are always temporary or always permanent across the entire Federal Government, we cannot include them in the GRS. Each agency must schedule its records on Presidential appointments on an agency-specific records schedule.

QUESTIONS RELATED TO GRS 2.2, ITEMS 090, 091 and 092

9. Why do you exclude records held at the Department of State from these items?

The Department of State maintains agency and dependent requests for passports as part of its mission-specific function. As a result, this GRS does not cover them. State covers its mission records under an agency-specific schedule.

10. Why did you include a filing instruction for official passports of transferred or separated agency personnel (item 092)?

Some agencies have scheduled these records, so this instruction provides clarity about steps any agency should take when the passports are no longer needed.

QUESTION RELATED TO GRS 2.2, ITEM 110

11. Why did you exclude service records for certain volunteers from this item? Does the GRS cover these individuals?

The volunteers whose records are excluded from this item ultimately have Official Personnel Folders (OPFs). Once those OPFs are created, records that otherwise would be covered by item 110 are incorporated into the OPFs, which are scheduled by items 040 and 041.

GRS 2.3, Employee Relations Records

QUESTIONS RELATED TO GRS 2.3, ITEM 060

1. How should agencies interpret the disposition instruction found in item 060: “Destroy no sooner than 4 years but no later than 7 years after case is closed”?

The Office of Personnel Management (OPM) has determined that each agency should select a period between 4 and 7 years as the disposition time frame for all instances of these records, and note it in agency manuals or other official records management documents. For example, Agency A’s records officer, after consulting with agency stakeholders, determines that 5 years satisfies the agency’s business needs. The records officer then applies that disposition to all of the agency’s administrative grievance, adverse action, and performance-based action records, and updates the agency manual and

any other relevant agency records management policies. Please note that these items are flexible only within the 4-7-year retention period; they do not allow for longer (or shorter) retention periods based on business need.

2. GRS 2.3, item 060, covers records of grievances filed by non-union employees. Does the GRS address similar records for employees covered by a bargaining unit?

Yes. The items in this GRS do not mean to state or imply policy on who can and who cannot use various methods to formally complain of mistreatment arising from or within the workplace. This item cites “*for instance, employees who are not members of a bargaining unit*” (emphasis added) only as an example. Records of administrative grievance actions filed by any eligible employee are covered by this item, not just those filed by non-bargaining unit employees. Employees should check with their human resources department to learn which avenues described under GRS 2.3, items 060 through 111 are available to an employee in a given situation.

3. Why does GRS 2.3, item 060 cover such a wide variety of records?

At first glance, administrative grievances (initiated by a staff member) and disciplinary, performance-based, and adverse actions (initiated by the agency against employees) may seem at odds with each other due to who initiates the action and its nature. However, many grievances are filed about subjects or situations in the workplace that also give rise to adverse management actions. Disciplinary, performance-based, and other adverse actions are all variants of such actions. One of the goals of the GRS is to have as few separate items as reasonably possible. We therefore merged these records into a single GRS item because their subject matter is similar, and because OPM provides the same guidance for retention of records created by all of these processes.

GRS 2.4, Employee Compensation and Benefits Records

QUESTION RELATED TO GRS 2.4, “PAYROLL” SECTION ITEMS 010 TO 050

1. Who holds the record copy of records described in items 010 through 050: the agency or the payroll service provider?

The GRS is agnostic on ownership of and responsibility for the record copy. Responsibility for retention of records for the length of time required for each of these five items should be negotiated and agreed upon between an agency and its payroll services provider.

QUESTIONS RELATED TO GRS 2.4, ITEM 010

2. The retention period for these records has been shortened from ‘Destroy 2 years after employee separation or retirement’ to ‘Destroy 3 years after paying agency or payroll processor validates data.’ Are the records less valuable than they used to be?

No, the value of the records has not changed. We made the change in response to an agency notifying us that the retention period change we made in July 2017 via GRS Transmittal 28 required these records to be kept much longer than needed. After further analysis, we determined that a 3-year minimum retention period after the data is validated is appropriate for these records because errors are identified within this time period. Additionally, the agency payroll record retained under GRS 2.4, item 040, which

has a 56-year retention period, should be sufficient documentation for other claims. The schedule authorizes agencies to retain records longer than 3 years if they wish to do so.

3. The records listed in this item look to me like system inputs. Why did you not cover them under GRS 5.2, item 020 (Intermediary records)?

GRS 2.4, item 010 concerns only *record* copies of documents listed in the series description. These record copies may be in electronic or paper form. If a payroll system receives paper, scans it, and enters it into the system, and the agency considers the scanned electronic version to be the record copy, then the paper is indeed system input covered by GRS 5.2, item 020.

QUESTIONS RELATED TO GRS 2.4, ITEM 030

4. The disposition instruction for this item used to state ‘Destroy after GAO audit or when 3 years old, whichever is sooner’ and now it states ‘Destroy when 3 years old, but longer retention is authorized if required for business use.’ Why did the retention period change?

The previous retention period allowed agencies to destroy the records earlier than the legally-necessary period for retaining the records under two applicable regulations. GAO audits always occur within 3 years, but 29 CFR 516.5(a) requires an employer to preserve payroll records for *at least* 3 years. Under the previous disposition instruction, if a GAO audit occurred before the 3-year mark, the records could be destroyed then, contrary to this regulatory requirement. In addition, the statute of limitations period under the Fair Labor Standards Act (FLSA), 29 U.S.C. § 55, necessitates a 3-year retention period. Claims under the FLSA generally must be filed within 2 years, but the limitations period may be extended up to 3 years in some situations.

While these records may be required for GAO audit, they still must be kept for *at least* 3 years regardless of that audit, but are generally not needed beyond 3 years. The previous retention period did not allow agencies to retain the records longer than 3 years as a result. However, we found no reason to limit longer retention if the agency has a business need, so we’ve added that option.

5. Who is responsible for retaining time and attendance records for 3 years? The agency, or the payroll provider (if different from the agency)?

Every office involved in documenting employees’ time worked is responsible for retaining the records it receives and creates for 3 years. Timekeepers in individual offices need to be able to document that the time and attendance information they sent to the payroll system provider was accurate. Only total hours of time worked and leave taken is forwarded to the payroll system provider. Backup documentation justifying those totals is usually retained by the timekeeper.

QUESTION RELATED TO GRS 2.4, ITEMS 100 AND 101

6. Why do these items not cover records created and maintained by the Department of Labor (DOL) Office of Workers’ Compensation?

Items 100 and 101 cover records agencies create about employee personnel injury compensation. At these agencies, the records are administrative in nature. DOL’s Office of Workers’ Compensation maintains personnel injury compensation records for employees across the Federal Government. As

such, these records document how DOL carries out that mission. Therefore, DOL schedules these records on an agency-specific records schedule.

QUESTION RELATED TO GRS 2.4, ITEM 110

7. Why does this item have no disposition authority number?

Item 110 has no associated disposition authority number because it has no instruction either to destroy the records or to save them permanently. The instruction instead merely directs the user to place the records into the “appropriate retirement system.” Their ultimate disposition is governed by a disposition authority connected to the retirement system records.

GRS 2.5, Employee Separation Records

1. Why doesn't this schedule include an item for Official Personnel Folders (OPFs)? What happens with them when employees move to a different agency or leave Federal employment?

Although OPFs are disposed of as part of the employee separation process, OPFs are created when employees enter Federal service, and agencies place most records in them while employees are in the active workforce. For that reason, an item in GRS 2.2, Employee Management Records, covers OPFs from an employee's entry into the Federal workforce through separation. In general, OPFs follow Federal employees when they move from one agency to another; when they leave Federal service, their personnel office sends their OPF to the National Personnel Records Center within 30 days of separation.

QUESTION RELATED TO GRS 2.5, ITEM 010

2. Why are items 010 and 011 not a single item?

Records in item 010 are entirely administrative — created as the agency responds to a separation request initiated by a staff member at any point in time. Agencies create records in item 011 as the result of an agency initiative -- a program specifically intended to reduce the agency's work force. These records document agency decisions, how the agency made them, and how it carried them out. Agency initiatives have clear start and end dates and therefore we can base disposition of the records on those dates.

QUESTION RELATED TO GRS 2.5, ITEM 011

3. What programs are included in “specific agency separation initiatives”?

Pages nested at OPM's website, <http://www.opm.gov/policy-data-oversight/workforce-restructuring/>, discuss various types of separation initiatives.

QUESTIONS RELATED TO GRS 2.5, ITEM 030

4. Why is item 030 a separate item and not just a bullet in item 020?

Items 020 and 030 cover different records, are created by different offices for different purposes, and have different retention periods. They thus do not lend themselves to being grouped and handled together. Each agency's human resources office creates and maintains records in item 020 for

personnel and benefits purposes. The retention period reflects the length of time an agency would normally need these records for business use. Records in item 030 concern information departing staff members provide to their offices about their programs, functions, and work, for continuity purposes. Those offices maintain these records themselves. The item's open-ended retention period reflects the varying value these records may have from agency to agency, office to office, and even staff member to staff member.

5. Does item 030 mean that the records a separated employee leaves behind can be destroyed when his/her office no longer needs them?

No. Records a separated employee leaves behind are the property of the office for which the employee worked, and should be retained under schedules applicable to the subject matter. Item 030 covers only records newly created in the process of trying to capture knowledge a departing employee may hold just in his or her head.

QUESTIONS RELATED TO GRS 2.5, ITEM 040

6. How can I file SF 1150 on the “left side of the folder” if the Official Personnel File (OPF) is electronic?

A paper OPF is a single folder with two sides: “left side” for temporary records and “right side” for permanent documents. E-folders in the eOPF—“temporary” and “permanent”—replicate the paper folder sides and are actually called “folder sides.” GRS 2.2, item 041 provides disposal authority for “left side” records.

7. Why does item 040 not have a disposition authority?

Item 040 is not a disposition instruction but, rather, a filing instruction. A filing instruction does not include authority to dispose of records; it simply instructs on where to file them.

QUESTION RELATED TO GRS 2.5, ITEM 051

8. Does the bullet “records documenting knowledge transfer activities” include records a departing employee leaves behind?

No. The bullet covers documentation of knowledge transfer *activities*. This may be nothing more than an acknowledgment from the departing employee's supervisor that knowledge transfer has taken place. The bullet does not mean to imply that all records containing that knowledge are retained by the agency's human resources office. In many cases, the reason there is a need to transfer knowledge before an employee leaves is because the knowledge is in the employee's mind only; records resulting from such knowledge transfer are covered by item 030. Exit interviews conducted for purposes of knowledge transfer with an employee in phased-retirement status are also covered by item 030. Records a separated employee leaves behind are the property of the office for which the employee worked, and should be retained under schedules applicable to the subject matter.

GRS 2.6, Employee Training Records

1. Why doesn't GRS 2.6 include mission-related training?

Agencies must submit their own schedules for records associated with mission activities (such as law enforcement, wilderness preservation, and aeronautics engineering) because the value of the records varies. For example, NASA has scheduled the records of astronaut training as permanent (N1-255-94-3) but the Federal Reserve System’s Training Bureau scheduled its Law Enforcement Unit mission-specific training records as temporary (N1-82-12-1).

2. Why doesn’t GRS 2.6 specifically include Learning Management Systems (LMSs)?

GRS 2.6 covers employee training records, so it schedules most content in an LMS, including course content, class tracking, individual development plans, and data reporting. However, financial information related to paying for courses, purchasing course material, paying outside vendors, or paying for training travel is included under GRS 1.1, which covers financial management and reporting records.

QUESTIONS RELATED TO GRS 2.6, ITEM 010

3. What is the difference between registration forms and employee attendance records (item 010) and individual training records like certificates (item 030)?

The records described in items 010 and 030 document different things. Item 010 covers records specific to a particular class, such as registration forms (who intends to come) and attendance records (who actually came). By contrast, individual training records (item 030) document training a single employee takes or plans (including Individual Development Plans (IDPs)). Agencies are also more likely to report registration and attendance records to the Office of Personnel Management (OPM) than individual employee training records.

4. Why does this item have 2 different disposition instructions: Destroy when 3 years old, or 3 years after superseded or obsolete?

The two retention periods address different ways the records covered by the item might “close.” Some records—such as the Authorization, Agreement, and Certification of Training (SF-182)—close when the training is complete. They can be destroyed when 3 years old. Other records—such as syllabi, presentations, instructor guides, handbooks, and lesson plans—may still be in active use when they become 3 years old. They “close” when active use ceases, and can be destroyed 3 years afterward.

QUESTION RELATED TO GRS 2.6, ITEMS 010 AND 020

5. What do I do with training material an outside vendor creates?

If a vendor develops training material for an agency and the agency owns the finished product, those materials are Federal records and the GRS covers them. If an agency purchases access to vendor-owned training material and the agency does not own it, then the GRS does not cover it.

QUESTION RELATED TO GRS 2.6, ITEM 030

6. Why do you exclude academic transcripts, professional licenses, and civil service exams?

Academic transcripts, professional licenses, and civil service exams are evidence of training, but not training received in the course of one’s Federal employment. Rather, they are generally prerequisites to being hired for a particular position and as such are usually filed in the long-term section of an

employee's Official Personnel Folder (OPF). Licenses may need to be retained or renewed, but this process also falls outside the scope of item 030's coverage ("training required by all or most Federal agencies"). Professional recertification and license renewal is often governed by boards entirely outside the Federal Government. When agencies do sponsor specialized training toward professional credentials, they must schedule these records independently.

GRS 2.7, Employee Health and Safety Records

QUESTION RELATED TO GRS 2.7, ITEM 030

1. Why is item 030 not part of GRS 2.6, Employee Training Records?

Occupational health and safety training records do not meet the basic definition of GRS 2.6, item 030: "Records documenting training required by all or most federal agencies." Not all agencies require occupational health and safety training for their employees. Additionally, hazardous waste program training (HAZWOPER) records must be retained for at least 5 years per 29 CFR Part 1910.120 Appendix E(9).

QUESTION RELATED TO GRS 2.7, ITEMS 060 and 061

2. Whose records do these items cover?

These items apply to employee, contractor, and intern individual occupational medical case files.

QUESTION RELATED TO GRS 2.7, ITEMS 063-066

3. What is the definition of a federal employee or contractor applicable to these items?

Executive Order 13991 Sec. 7. Scope. (a) (i) defines "federal employees" and "federal contractors" as employees (including members of the Armed Forces and members of the National Guard in federal service) and contractors (including such contractors' employees) working for the executive branch.

4. Does the GRS require agencies to create or collect these records?

No, agencies should follow the Safer Federal Workplace guidance regarding creation and collection of the records. The GRS provides agencies with the authority to dispose of records they collect.

5. Do agencies need an approved disposition authority from NARA to destroy unsolicited copies of vaccination cards or related documentation from the public?

No, an agency does not need an approved disposition authority from NARA because this unsolicited documentation is designated as non-record.

6. Where should my agency file these records?

NARA does not tell agencies how to file their records. The GRS only provides authority to dispose of records. Agencies should follow the Safer Federal Workplace guidance, or where applicable, guidance from the Office of Personnel Management. Agencies may choose to file these records in Employee Medical Files and use their authority for those records instead of GRS 2.7, items 063 or 065.

7. Does item 063 apply to vaccine attestations received from new hires during the onboarding process?

Yes. These records may be temporarily located with onboarding records when first collected during the onboarding process, but ultimately may be retained with other agency vaccine attestation records covered by item 063 of this schedule. Agencies also have the option of filing these records in occupational health files if that is their chosen practice.

8. What GRS item covers medical and religious accommodation requests?

We believe GRS 2.3, item 020, Reasonable accommodation case files, is appropriate for religious accommodations as well. We will be updating GRS 2.3, items 010 and 020, to clarify it includes religious accommodations as well as reasonable accommodations.

GRS 2.8, Employee Ethics Records

1. Does this schedule cover records the Office of Government Ethics maintains relating to its oversight of the Government-wide ethics program?

No, this schedule applies only to records other agencies create relating to their own ethics programs.

QUESTION RELATED TO GRS 2.8, ITEMS 060 to 081

2. Why are items 060 through 081 not aggregated into a single item?

We cannot aggregate financial disclosure reports covered by items 060, 061, 062, 063, 070, 071, 072, 080, and 081 into one item because each form has a different statutory recordkeeping requirement.

QUESTION RELATED TO GRS 2.8, ITEM 062

3. Why must an agency retain a periodic transaction report for seven years?

Under the Ethics in Government Act, agencies must allow public access to an OGE Form 278/278e for 6 years from the date the agency received it. Therefore, agencies must retain OGE Form 278-T reports for seven years to ensure that all information supporting the OGE Form 278/278e is available to the public for review during the entire 6 years prior to destruction/deletion.

GRS 3.1, General Technology Management Records

1. What are the definitions of terms used in GRS 3.1?

Information technology infrastructure (item 010) means the basic systems and services used to supply the agency and its staff with access to computers and data communications. Components include hardware such as printers, desktop and laptop computers, network and web servers, routers, hubs, and network cabling, as well as software such as operating systems and shared applications (e.g., word processing). The services necessary to design, implement, test, validate, and maintain such components are also considered part of an agency's IT infrastructure.

System development (item 011) is the development of information technology (IT) systems and software applications through their initial stages up until hand-off to production and includes planning, requirements analysis, design, verification and testing, procurement, and installation.

Special purpose computer programs and applications (item 012) are software that is developed by the agency or under its direction solely to use or maintain electronic records. (Item 012 covers such software for electronic records that are authorized for disposal in a GRS item or a NARA-approved records schedule.)

Master files (item 012) are the actual content of the electronic records series or system, or in other words the recordkeeping copy of an electronic record or system. Master files may consist of data, scanned text, PDFs, digital images, or some other form of electronic information. They may include the information content of an entire system or that of a group of related files. Related records within a single master file are not always the same format.

Configuration and change management (item 030) is a process or methodology used to develop, operate, and maintain computer software, systems, and infrastructure improvements.

Data administration (items 050 and 051) includes maintenance of data standards, corporate data models, registries, and data definitions and dictionaries.

2. Why doesn't GRS 3.1 apply to system data or content?

GRS 3.1 excludes system data or content because it would be impossible to apply an across-the-board retention period for these records. Instead, an agency should judge the informational value of each dataset and submit a records schedule to NARA for approval.

3. Why does GRS 3.1 exclude records documenting the Office of Management and Budget (OMB) and US Federal Chief Information Officers Council (CIO Council)'s Government-wide information management planning and programming?

The GRS does not include these records because only OMB and the CIO Council are responsible for Government-wide information management planning and programming; at that level, the function is not common to multiple agencies so isn't appropriate for a GRS. Therefore, OMB schedules OMB and CIO Council records through agency-specific records schedules.

4. Why aren't the OMB Exhibit 300 records covered explicitly by this GRS?

GRS 6.3, item 010, Information Technology program and capital investment planning records, covers OMB Exhibit 300 business cases for major investments, systems, acquisitions, or operational assets identified in the agency's capital investment portfolio and related clearance and review records. Copies of Exhibit 300 records may exist in case files scheduled in GRS 3.1, such as Infrastructure Project Records (item 010).

5. Why can't I use this schedule for IT project contracts?

Records needed to support contracts should be in procurement files, which are scheduled under GRS 1.1, Financial Management and Reporting Records.

6. Several items have 5-year retention periods. Why can't I just keep everything in GRS 3.1 for 5 years?

These records are not maintained for a flat 5 years. Different items have different points in time at which the retention period starts based on the business processes related to the records. For instance, item 001 starts the retention period when the agency creates the records (retain until 5 years old), but item 010 starts the retention clock ticking when an agency terminates a project (retain for 5 years after a project is terminated), and item 011 starts the retention period when the agency stops using the system (retain for 5 years after the system is superseded). Because all GRS 3.1 items have flexible retention periods, allowing agencies to retain the records for longer periods if required for business use, agencies may choose to aggregate all records covered by GRS 3.1 into one or more big buckets without NARA approval, as long as the retention period for the bucket accommodates the longest potential retention period of the records within it.

QUESTIONS RELATED TO GRS 3.1, ITEM 012

7. Why does item 012 exclude software or applications necessary to use or maintain any unscheduled master file or database or any master file or database scheduled for transfer to the National Archives?

Software and applications used with permanent records are not covered by this GRS schedule because agencies and NARA may need them to maintain and access the permanent records and they may therefore be of permanent value as well. Such software and applications need to be scheduled and appraised on a case-by-case basis.

8. Why does item 012 exclude commercial, off-the-shelf (COTS) programs or applications, unless modified?

Unmodified commercial, off-the-shelf (COTS) programs or applications are considered non-records.

9. Why does computer software need to be kept?

Computer software needs to be kept as long as needed to ensure access to, and use of, the electronic records in the system throughout the authorized retention period to comply with 36 CFR Sections 1236.10, 1236.12, 1236.14, and 1236.20.

QUESTION RELATED TO GRS 3.1, ITEM 030

10. Why do we need to keep system management records?

Agencies need to keep system management records for two reasons. First, the records document system changes. Second, we need them to understand electronic records agencies transfer to NARA (see item 030 Notes 2 and 3).

QUESTIONS RELATED TO GRS 3.1, ITEM 050

11. Why should I use item 050 for certain technical documentation (e.g., data dictionaries, file specifications, code books, record layouts, etc.) rather than items 011 System development records and 030 Configuration and Change Management Records?

When electronic records are scheduled as permanent in the GRS or in a NARA-approved agency schedule, the documentation that is needed to read and/or understand the records must be transferred to the National Archives to allow for continued access. Without these records NARA cannot provide access to the information; therefore the specific record types listed in item 030 have additional value beyond their use in system development and configuration management.

12. Why does Note 1 tell me not to transfer records to NARA citing the item 050 authority?

Each transfer to NARA can be linked to only one disposal authority. If system documentation necessary to preserve permanent e-records is transferred to NARA with the e-records themselves, the two record sets are less likely to be mistakenly separated from each other in the future. Naturally, the combined transfer must be under the authority (records schedule item) covering those e-records.

GRS 3.2, Information Systems Security Records

1. What are the definitions of terms used in GRS 3.2?

Information system means the organized collection, processing, transmission, and dissemination of information in accordance with defined procedures, whether automated or manual. (36 CFR 1220.18)

Information systems security records are records created and maintained by Federal agencies related to protecting the security of information technology systems and data and responding to computer security incidents.

Information technology infrastructure (item 010) means the basic systems and services used to supply the agency and its staff with access to computers and data communications. Components include hardware such as printers, desktop and laptop computers, network and web servers, routers, hubs, and network cabling, as well as software such as operating systems and shared applications (e.g., word processing). The services necessary to design, implement, test, validate, and maintain such components are also considered part of an agency's IT infrastructure.

Master files (items 050 and 051) are the actual content of the electronic records series or system, or in other words the recordkeeping copy of an electronic record or system. Master files may consist of data, scanned text, PDFs, digital images, or some other form of electronic information. They may include the information content of an entire system or that of a group of related files. Related records within a single master file are not always the same format.

Public Key Infrastructure (PKI) related records (items 060, 061, 062) are a type of digital identity authentication record. The term “digital identity authentication” covers a wide range of technologies. These technologies help agencies ensure that people or organizations are who and what they say they are. Agencies use identity authentication to validate electronic business transactions; limit access to only those who are authorized to receive and retrieve specific information; and certify that records are legitimate, have not been altered, and that the creation, access, and use of records are limited to authorized individuals. For more information, see [NARA Bulletin 2015-03, Guidance on Managing Digital Identity Authentication Records](#).

QUESTION RELATED TO GRS 3.2, ITEM 031

2. What designates a system as requiring special accountability for access?

As stated in the schedule, systems requiring special accountability for access are those that are highly sensitive and potentially vulnerable. It is up to individual agencies to determine which of their information systems require special accountability. NARA does not make this determination.

QUESTION RELATED TO GRS 3.2, ITEMS 035-036

3. What is the relationship between OMB Memo M-21-31 and GRS 3.2, items 035 and 036?

OMB issued [OMB M-21-31, Improving the Federal Government’s Investigative and Remediation Capabilities Related to Cybersecurity Incidents](#), on August 21, 2021. The records requirements outlined in the OMB Memo apply to most of the federal government, so NARA issued disposition authority for these records through a GRS to support the retention requirements in the OMB Memo.

Although Table 5 in Appendix C of the memo specified retention periods for categories of logging records, the OMB Memo itself does not provide legal authority to dispose of the records. It is not unusual for GRS disposition authorities to support retention requirements established in guidance or regulations by other oversight agencies, but the legal authority to dispose of records can only come from a NARA-approved record schedule, such as the GRS.

4. Why is the retention in OMB Memo M-21-31 and GRS 3.2, items 035 and 036 different?

The retention requirements in Table 5 of Appendix C in OMB Memo M-21-31 and this GRS are not substantively different. The most common record retention in both documents totals 30 months. The main difference is the GRS does not specify active and cold storage retention periods. Instead, it combines the 12 and 18 month periods into a single 30 month retention. Agencies still can and should follow the active and cold storage requirements outlined in the OMB Memo. The GRS also simplified the retention to the longest and most common retention (30 months), as there was only one log type in the memo with a shorter retention (Cloud CGP, 24 months total). Agencies wishing to use the shorter retention for this specific log type would have to schedule the records on an agency-specific schedule.

GRS 4.1, Records Management Records

QUESTION RELATED TO GRS 4.1, ITEM 010

1. Does this item cover tracking and control records (*also known as finding aids*) for unscheduled records?

No. We treat unscheduled records as permanent records until they are scheduled.

QUESTION RELATED TO GRS 4.1, ITEM 020

2. May we keep certain records under this category, such as those about destroyed records, longer than 6 years, but destroy others once the 6 years is up?

Yes, the disposition instruction authorizes both destroying records once they’ve met the 6-year retention period and retaining certain records beyond 6 years, if needed for business use. Agencies must keep the Transfer Request (TR); Legal Transfer Instrument (LTI); and SF 258, Agreement to Transfer Records to the National Archives of the United States for a minimum of 6 years so that agencies can properly redirect Freedom of Information Act (FOIA) requests to NARA after the agency has transferred the records to the National Archives.

QUESTION RELATED TO GRS 4.1, ITEM 031

3. Why is there an item for copies of vital records? Aren't such copies non-records?

These may be copies of records held elsewhere in the agency, but these ones exist as a separate body of material for a separate business purpose: to respond to an emergency. They are therefore records in their own right.

GRS 4.2, Records of Information Access and Protection

QUESTION RELATED TO GRS 4.2, ITEMS 030, 031, and 032

1. Items 030, 031, and 032 are related to each other topically and all have very short retention periods. Why aren't they merged into one item with a unified retention period?

These items state the minimum amount of time that agencies should have a strictly business use for each type of record. If an agency, for its convenience, wishes to collapse items 030, 031, and 032 into a unified item (sometimes referred to as a bucket) with a single retention period, it can do so because we authorize longer retention periods for all three items if required for business use. The retention period for the bucket would then be the longest of the retention periods the agency needs for any one of the included items.

QUESTION RELATED TO GRS 4.2, ITEM 050

2. GRS 4.2, item 050 seems to cover some of the same records as GRS 4.2, item 020. What records are unique to item 050?

The Privacy Act at 5 U.S.C. § 552a(c) requires agencies to document all disclosures it makes of Privacy records (records protected under the Privacy Act). The seeming conflict between items 020 and 050 comes from the two ways an agency may maintain this documentation.

The first way is to file disclosure documentation with the disclosed records themselves. The resulting file then contains both the disclosed records (governed by an applicable schedule) and the disclosure documentation (governed by item 020). The agency must ensure the joint file is retained for the longer of the two retention periods. Under this model, records proving that the agency is complying with 5 U.S.C. § 552a(c) are scattered piecemeal throughout these other files. The agency may therefore decide to keep a log that documents the specific details of all disclosures in one location. Item 050 uniquely governs such a log.

The second way an agency may maintain disclosure documentation is to file all such documentation in a separate records series it creates solely for that purpose. The agency schedules such a records series, which may or may not include copies of the disclosed records, under item 020. Under this model, an agency does not need to create a log in order to document all disclosures in one place, so it may not create records covered under item 050.

QUESTION RELATED TO GRS 4.2, ITEMS 060 AND 061

3. Why are items 060 and 061 separate, and not a single item?

The instructions reflect the different ways agencies may maintain these records, which impact how the agencies subsequently dispose of them. An agency may file records documenting erroneous release of records with the erroneously-released records themselves (item 060). In this case, the agency retains the documentation records as long as it retains the related records. Another agency may maintain a separate series of all erroneous release cases divorced from the records they concern (item 061), in which case the agency may destroy the documentation records 6 years after the erroneous release. In either case, agencies must retain records documenting an erroneous release for at least 6 years.

QUESTION RELATED TO GRS 4.2, ITEM 120

4. Why is there no disposition authority for this item?

The disposition instruction for this item (classified information nondisclosure agreements maintained in the individual's official personnel folder) is really a filing instruction telling agencies to file the records in the OPF. It does not include authority to destroy records.

QUESTIONS RELATED TO GRS 4.2, ITEMS 150, 160, AND 161

5. Why does this schedule not cover Privacy Act Statements (PASs)?

The Privacy Act requires agencies to tell individuals providing personal information destined for a system of records how the agency will use that information and to whom the agency will disclose it. The vehicle for this is a PAS. This schedule does not cover PASs because they are not stand-alone documents or a records series in themselves. Rather, agencies tend to incorporate them into the very forms on which they ask individuals to enter data. They generally appear as part of a form's "small print," often at the bottom of the page.

6. If my agency posts SORNs and PIAs to its web pages, are those the record copy covered by this item?

The GRS is agnostic on where, how, and by whom records are retained. An agency may choose to retain its record copy of active SORNs and PIAs on its external or internal web pages. An agency should determine as part of its policies and procedures where and how it keeps recordkeeping copies.

7. Why must I retain a copy of a System of Records Notice (SORN) when I can always get it from the Federal Register, where it is a permanent record?

Item 150 covers not only a copy of the SORN itself, but also significant background material showing its development. These records have continuing business use as long as a SORN is in effect.

8. Does item 161 cover internal Privacy Impact Assessments (PIAs)—information collection from agency employees—as well as PIAs about information collection from the public?

Yes. The item covers all PIAs, regardless of whether the agency collects the information from the public or from the subset of the public known as agency employees. OMB memo M-03-22, "Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002," indicates agencies must use the same stringent measures to protect information about agency employees as well as the public.

QUESTION RELATED TO GRS 4.2, ITEM 170

9. What is the OMB “Final Guidance” to which this item refers?

OMB guidance on Computer Matching Agreements appears in several documents, some of them post-dating the 1989 document bearing the word “final” in its title. See:

- Final Guidance interpreting the Provisions of Public Law 100-503, published in the *Federal Register* (54 FR 25818, June 19, 1989)
- OMB Circular A-130, Appendix I (which, as of August 2016, is in the process of being revised and moved to Circular A-108)
- The Computer Matching and Privacy Protection Amendments of 1990 and the Privacy act of 1974, published in the *Federal Register* (56 FR 18599, April 23, 1991)
- Privacy Act of 1974: Revised Supplemental Guidance for Conducting Matching Programs, published in the *Federal Register* (47 FR 21656, May 19, 1982)

GRS 4.4, Library Records

1. Does this schedule cover library collections?

No. This schedule covers only records about running a library. It does not cover records about the materials in its holdings. 36 CFR 1222.14 defines most material held in library collections as non-records.

Special collections, however, may be easily confused as records. Special collections are library and archival material characterized by its intrinsic, historic, or unique nature, regardless of format (*e.g.*, rare books, manuscripts, photographs, institutional archives). These materials may have at one time been active agency records, but transferring them to a library special collection means the GRS cannot cover them. They are either under an agency-specific disposition authority, or no longer governed by any records schedule at all.

2. Why doesn't the GRS cover records of special collections' administration?

The GRS schedules records based on content, not type. GRS 4.4 schedules records that agencies create in the course of routinely administering and managing a library. While special collections involve similar functions, their administrative records are less likely to be routine. Since special collections contain unique material, their management creates records specific to special business processes: accessioning, special handling, access restrictions, security, tracking, preservation requirements, and loans to external entities, to name a few. In addition, agencies often prove the authenticity and provenance of special collection items through records showing chain of custody. The historical value of these records must be linked to the value of the special collection itself. Since these records cannot be declared universally temporary or universally permanent, it is not possible to include them in a GRS.

3. My agency creates and publishes special reports, journals, and magazines that are in the library collection. Are these permanent records?

It depends on whether the library maintains the record copy or a reference copy. Agencies typically schedule their own publications as permanent records. Libraries often collect and make available agency publications for reference purposes. Copies the library keeps only for reference are non-record and the agency does not need to schedule them. Agencies must schedule the recordkeeping copies of their publications regardless of where they are held.

4. Can I use this GRS for my library's website?

The GRS is media-neutral. This means that it covers records such as “promotional material describing library services and resources” (item 010) and “catalog searches and circulation of material” (item 020) whether the agency maintains them in hard-copy form or places them on a website (or in any other media form). Many library online resources are non-record material (reference material, books, newspapers, etc.), which an agency does not need to schedule. Given the potential mix of materials that may be on a website, GRS 4.4 does not automatically cover *all* materials on a Federal library website *per se*.

GRS 3.1, item 020, covers website administration records. GRS 5.1, item 020, covers copies of the records the agency uses or links to *on* websites or web servers, but not records *of* web pages themselves. No GRS item covers, as a single entity, the records that produce a web page’s look, feel, and content.

QUESTION RELATED TO GRS 4.4, ITEM 020

5. Item 020 covers records that contain information about library users that likely include personally identifiable information (PII). Why are there no instructions for how agencies should handle PII?

The GRS provides instructions for how long agencies must retain records, not how agencies internally manage their records. Handling PII is in the purview of agency policies and procedures; it is outside the scope of the GRS.

GRS 4.5, Digitizing Records

1. What is the purpose of GRS 4.5?

This schedule:

- Provides disposition authority for source records that were digitized in accordance with NARA regulations.
- Outlines exclusions where the GRS cannot be applied to source records.
- Supports the requirement for federal agencies to manage all permanent records electronically to the fullest extent possible.

2. How does GRS 4.5 work with NARA’s digitization standards?

Agencies can use GRS 4.5 if they validate that the digitized records meet NARA’s digitization standards.

The standards for permanent records are available in [36 CFR 1236 - Subpart E](#).

The standards for temporary records are available in [36 CFR 1236 - Subpart D](#).

If your agency validates that the digitization of federal records meets the standards, then your agency can use GRS 4.5, item 010, to destroy the source records, provided they do not meet any of the exclusions.

After validation, the digitized records become the recordkeeping copy. Therefore, your agency must manage the digitized records according to the disposition authority approved for the source records. After the retention expires, your agency will destroy digitized temporary records or transfer digitized permanent records to NARA, depending on the applicable records schedule.

3. What are the exclusions to GRS 4.5?

- Source records whose digitized versions do not meet NARA’s digitization standards
- Permanent source records in formats not yet covered by NARA’s digitization standards
- Permanent source records dated before January 1, 1950
- Permanent source records with intrinsic value

In addition, the GRS 4.5 does not apply to:

- Final digitized versions of records
- Input/source records for non-digitized records

4. How does my agency use GRS 4.5 if records are unscheduled?

Your agency must first schedule the records to have disposition authority for the digitized version. Once you know the disposition of the digitized records, you can determine if the source records are disposable under GRS 4.5, item 010.

5. What does my agency do if it has source records that are excluded from GRS 4.5, item 010?

In most scenarios, your agency must submit an agency-specific schedule for source records that are excluded from GRS 4.5. Consult your [NARA Appraisal Archivist](#) if you have questions about rescheduling. See the table below for further guidance.

Exclusion	Related FAQ
1. Digitized versions do not meet the standards established in 36 CFR 1236 Subpart D - Digitizing Temporary Federal Records or Subpart E - Digitizing Permanent Federal Records.	See question 6 below.
2. Formats not covered by 36 CFR 1236 Subpart E - Digitizing Permanent Federal Records	See questions 7 and 8 below.
3. Source records that were created before 1 January 1950 that have been scheduled as permanent or are unscheduled.	See questions 9 and 10 below.
4. Source records that have intrinsic value in the original medium that would be lost if the content were converted to another medium.	See questions 11 and 12 below.

6. What if my agency cannot validate that the digitized records meet NARA’s digitization standards?

If the digitized records cannot be validated as complying with the 1236 Subpart D or E requirements, then your agency cannot use GRS 4.5 to dispose of the source records.

For records that were digitized before the publication of 1236 Subpart D or E, see the Frequently Asked Questions (FAQs) about Previously Digitized Records for options on how to proceed.

7. What does my agency do if NARA has not issued digitization standards for specific media types, such as film records or x-ray film?

GRS 4.5 cannot be applied to source records in media types not covered by [36 CFR 1236 - Subpart E](#). NARA is developing additional digitizing standards for other formats and will be updating Subpart E over time.

If your agency has an approved records schedule that specifically identifies the source record of a specific format as permanent, you may continue to transfer those records to NARA through June 30, 2024, as directed by OMB/NARA memo M-23-07.

Due to preservation concerns, we advise agencies to contact the appropriate [NARA Special Media Branch](#) to transfer the records early rather than to send special media records to offsite records storage.

For more information on digitizing or managing these records, contact rmstandards@nara.gov or your NARA Appraisal Archivist.

8. What if a series of permanent source records includes both photographic prints that are covered by NARA standards and negatives that are not covered?

You should digitize the photographic prints to NARA standards in [36 CFR 1236 - Subpart E](#) and destroy the source records using GRS 4.5, item 010. You should either transfer the negatives to NARA before June 30, 2024, or wait until NARA has issued digitization standards for film records. If you have already digitized the negatives, please contact rmstandards@nara.gov.

9. What does my agency do if it has permanent or unscheduled source records that were created or received before January 1, 1950?

GRS 4.5 cannot be applied to permanent source records that were created or received before January 1, 1950. Agencies must submit a records schedule for the pre-1950 source records. However, GRS 4.5 can be applied to temporary source records created or received before January 1, 1950. For unscheduled records, see question 4.

The 1950 date exclusion is based on the passage of the 1950 Federal Records Act, which established modern recordkeeping practices in the federal government. This exclusion allows NARA to assess the value of these records because they were created or received before modern recordkeeping practices.

10. What if a series of permanent source records was created or received both before and after January 1, 1950?

Your agency should submit a records schedule to dispose of the entire date span of source records when any of the records were created or received before January 1, 1950.

The digitized versions of the permanent records are not impacted by the January 1, 1950 date. Those digitized versions should be transferred according to the disposition instructions in the agency's approved records schedule.

11. What does my agency do if it has source records that are identified as having intrinsic value?

GRS 4.5 cannot be applied to source records that have intrinsic value.

If the records were already identified as having intrinsic value, transfer the source records as scheduled.

Otherwise, consult your [NARA Appraisal Archivist](#) to determine if a new schedule is required.

12. How do I know if my agency's source records have intrinsic value?

Intrinsic value is the archival term applied to permanently valuable records with qualities and characteristics that make the records in their original physical form the only archivally acceptable form for preservation. Although all records in their original physical form have qualities and characteristics that would not be preserved in copies, records with intrinsic value have them to such a significant degree that the originals must be saved. You can find more information here: [Appraisal Policy for the National Archives, Appendix 3: Qualities and characteristics of records with intrinsic value](#).

Records schedules or appraisal memos sometimes indicate if records have intrinsic value. Agencies should consult with their [NARA Appraisal Archivist](#) for additional guidance.

13. What authority do I use for the digitized records?

GRS 4.5 does not apply to any digitized versions of the records. GRS 4.5 only applies to source records. You may not apply GRS 4.5 to unscheduled records.

The agency records schedule approved for the source records applies to the digitized records as long as the digitization standards are met.

14. GRS 4.5 authorizes the destruction of source records after validation. Can my agency keep the source records longer?

Yes. The GRS allows for longer retention if the records are required for business use. In addition, legal constraints may make it necessary for an agency to retain source records for some time after digitizing. Consult with legal counsel to ensure there are no concerns associated with rights and interests, appeal rights, benefits, national security, litigation holds, or other similar issues affecting the source records retention period. Agencies should also analyze the costs of storing, maintaining, and executing discovery against records in multiple formats.

15. How do GRS 5.2, item 020 for intermediary records, and GRS 4.5, item 010 for source records relate to each other?

GRS 4.5, item 010, covers source records. Source records are the records from which a digitized version or digitized record is created. The source record should be the record copy that was used in the course of agency business.

GRS 5.2, item 020, covers intermediary records, or records used to create a subsequent record; for example, paper forms that are manually entered directly into a system or electronic data used to input information into a system.

See also Frequently Asked Questions (FAQs) About GRS 5.2. Consult the GRS Team (GRS_Team@nara.gov)

for additional guidance.

16. Are there GRS items that cover other copies of digitized records?

Yes, certain copies of digitized records are covered by other GRS items:

- Copies used for quality control or quality assurance purposes. (Transitory Records: DAA-GRS-2017-0003-0001, GRS 5.2, item 010)
- Backup copies of permanent records (DAA-GRS-2013-0006-0007, GRS 3.2, item 050)
- Backup copies of temporary records (DAA-GRS-2013-0006-0008, GRS 3.2, item 051)

17. My agency re-digitized source records and now has two sets of digitized records: the first set that did not meet NARA standards and the second set that did. Can I apply the GRS to that first set of non-compliant digitized records?

No. The GRS 4.5 applies to the source records used to create digitized records that meet the digitization standards. The GRS 4.5 does not apply to digitized versions of the records that don't meet the standards.

If the non-compliant copies of digitized records are preserved only for convenience, they are non-record, and could be destroyed according to agency policy.

If copies of non-compliant digitized records are required for only a short time and are not required to meet legal or fiscal obligations or serve as evidence of decision-making, then they could be destroyed using GRS 5.2, item 10. In this scenario, the first set of digitized versions may be considered transitory records.

Agencies should discuss this with their counsel before proceeding. For example, if an agency used non-compliant scans to determine benefit eligibility, they may need to retain that copy for some additional amount of time in order to fully understand what information was available to the person making the benefits determination.

18. Where can I find more information?

More information about the digitization of records is available on NARA's [Digitization of Federal Records website](#).

GRS 5.1, Common Office Records

QUESTIONS RELATED TO GRS 5.1, ITEM 020

1. What are "non-recordkeeping copies" as covered by item 020?

Agencies designate one copy of records as the "official record," or "recordkeeping," copy for formal purposes. (Occasionally, multiple recordkeeping copies exist to document entirely separate business purposes. For instance, an agency may retain vehicle accident records to document the agency's fleet [GRS 5.4, item 140] and also its security/safety program [GRS 5.6, item 100].) Non-recordkeeping copies are any copy other than these one or two official record copies.

Do not confuse the term "non-recordkeeping" with "non-record." All recordkeeping copies are records, but some non-recordkeeping copies are also records. Non-recordkeeping copies are records if an

employee uses them to make decisions or take actions, or agencies create them in the course of conducting business. For example, if your agency copies your agency email into an official recordkeeping system for long-term preservation, such as a case file or an email archiving system, the copies of your email in that system are the official recordkeeping copies. But, copies of the same messages you create or receive within your own account are still records you and others use to conduct business, so they are non-recordkeeping copies that are also records. Agencies must retain non-recordkeeping copies that are records for the appropriate retention period in the GRS or agency-specific schedule that covers them. However, the retention periods for non-recordkeeping records are generally not as long a time as the official recordkeeping copy retention periods.

2. Item 020 states that it includes “copies of the above electronic records maintained in websites or web servers, but EXCLUDING web pages themselves.” What is a “web page” in this context?

The term “web page” as it is used in this item refers to the electronic file(s) that make up the page as it renders on the web, such as an HTML or XML file, style sheets, and any other associated files that may make up the web page and produce its look and feel when the page is opened on a screen.

3. Why does item 020 not cover copies that originate in hardcopy or paper format?

The GRS doesn’t include copies that do not originate in an electronic format largely because almost all records now originate in some sort of electronic format. Additionally, it is less likely that a record originating in hardcopy (for example, handwritten notes) is copied in an electronic format elsewhere, so the original record may be the recordkeeping version because it is the only one that exists.

GRS 5.2, Transitory and Intermediary Records

QUESTIONS ABOUT ITEM 010 – TRANSITORY RECORDS

1. What are examples of transitory records?

Transitory records are required for only a short time (generally less than 180 days). They are not required to meet legal or fiscal obligations or to initiate, sustain, evaluate, or provide evidence of decision-making.

The following are possible examples of transitory records. Even with these examples, however, the records must meet the conditions defined above:

- Transmittal documents such as email, letters, cover memos, and facsimile cover sheets
- Received copies of circulated internal information such as agency instructions, notifications, circulars, newsletters, and email blasts to employees
- Messages received from agency distribution lists or listservs
- “To-do” or task lists, assignments, and work orders, including for custodial services or minor repair work
- General information request files requiring no policy decision or special compilations or research
- Ad-hoc reports, including queries on electronic systems, used for one-time reference
- Data output files from electronic systems for information sharing or short-term reference

2. Why does this item include seemingly non-record materials such as “messages received from agency distribution lists or listservs” and “notifications, circulars, newsletters, and email blasts to employees”?

Just because something is a copy does not mean that it is non-record. If it is used for decision-making or taking action, it is a record. Only reference copies are non-records. These record types are included here as examples of transitory records for those agencies that may be hesitant to declare them non-record.

3. When are electronic messages and email transitory?

Certain electronic messages, including email, *may* be transitory. Examples include:

- Electronic messages coordinating schedules, appointments, and events
- System reminders, alerts, bounce backs, and ‘for your information’ messages where the recipient is not required to take any action

However, electronic messages and email may only be deemed transitory provided that they *do not*:

- contain information necessary to adequately and properly document the activities and functions of the agency
- provide documentation of agency decisions and commitments reached orally (person-to-person, phone, video, or in conference)
- convey information of value on agency activities if the electronic message adds to a proper understanding of agency operations and responsibilities
- document the formulation and execution of policies and decisions
- denote actions or decisions taken by agency Capstone officials (Capstone officials are defined in GRS 6.1)
- provide evidence related to fiscal or legal rights and obligations

4. What are “inaccessible permanent records” in the exclusion? Why does item 010 exclude summarized information derived from such records?

Electronic records may be scheduled as permanent, but a given record may be lost, corrupted, or otherwise unusable. In that case, a data file output containing summarized information may be the only accessible version of the record. NARA might want to take this output record in place of the inaccessible/unavailable permanent master record. This exclusion does not mean agencies must keep such outputs in case the permanent record becomes inaccessible at some future point. It only means that if the master file is inaccessible and you have the output records, you should contact NARA to see if you should transfer the output records instead.

QUESTIONS ABOUT ITEM 020 – INTERMEDIARY RECORDS

5. What are examples of intermediary records?

Intermediary records exist to create subsequent records. They must not be required to meet legal or fiscal obligations or to initiate, sustain, evaluate, or provide evidence of decision-making.

The following are examples of intermediary records:

- Ad-hoc reports, including queries on electronic systems, used to create a subsequent report
- Drafts not intended for further use that do not contain significant or substantial changes or annotations and are not required to document business activities
- System printouts or versions used to verify data or answer queries that are not part of regular reporting procedures and are not required for ongoing use
- Spreadsheets or word processing documents that have been incorporated into a separate final document

- Audio and video recordings of meetings that have been fully transcribed or that were created explicitly for the purpose of creating detailed meeting minutes (once the minutes are created) (Note: The term “meetings” does not include interrogations, interviews, or other situations whose purpose is to subject individuals to questioning.)
- Dictation recordings
- Paper/analog input records, such as paper forms, that are not digitized and are used solely for data entry, where all significant information on the input record is captured as data in the electronic system
- Electronic input records, such as transaction files or output files created specifically for input into another system
- Digitized versions of records solely created for the purpose of extracting data from the digitized record for inclusion in another system. (This GRS covers the digitized version of the record, but the source record is not covered by this GRS or GRS 4.5.)
- Copies of electronic records received from other federal agencies or state, local, or tribal government entities for input or integration into the agency’s systems
- Routine or rough calculations

6. What types of records do not fall under this item?

This item would not cover the following:

- Source records that have been digitized so that the digitized version will serve as the recordkeeping version of the record (see GRS 4.5, item 010)
- Early versions of records that include information, such as comments or annotations demonstrating decision making, that are not captured in the final record
- Data in a case tracking system where users enter information from a record, but the record itself remains a distinct case file
- Audio and video recordings of meetings that are not created for transcription

7. What are source records in the context of this item?

Presently, the term “source record” appears in two different contexts in the GRS, each with slightly different meanings.

Intermediary source records, or input records, are the records from which information in an electronic system originates. They may include electronic records such as upload files staged for ingest into a system. They also may include paper or analog records such as paper forms, where information is manually entered from the form into the system. These input records are covered by GRS 5.2, item 020.

Source records used in digitizing records, where the digital version replaces the source record, are scheduled in GRS 4.5, item 010, with certain exclusions. This type of source record is defined as the record from which a digitized version or digitized record is created. The source record should be the record copy that was used in the course of agency business.

Also, keep in mind that the process of entering information into a system doesn't always create a separate record. For example:

- A user enters information directly into the system via an online form; the system captures the data as it is entered;
- Data that moves automatically from one system to another with no associated data file, such as with

file or data syncing.

8. Can an electronic system’s content consist entirely of intermediary records?

Yes. If a system’s sole function is to receive and integrate data from two or more other systems and export the resultant product to yet another independent system, it is known as a “pass-through system.” GRS 5.2, item 020, covers such a system’s content.

9. Can an agency use the GRS if an information-sharing agreement covers intermediary records?

Yes, the disposition instructions in the GRS are flexible enough to support disposition of records it receives under an information-sharing agreement or license. The agency should destroy or return the records as required by the agreement.

The subsequent records the agency generates should be scheduled on an agency-specific schedule.

GRS 5.3, Continuity and Emergency Planning Records

1. What is the relationship of Continuity of Operations Planning (COOP) to emergency planning?

COOP is a part of overall emergency planning. Emergency planning in Federal agencies also includes other types of emergency plans. Item 010 lists the following other types of emergency plans: Devolution Plans, Occupant Emergency Plans (OEP), Emergency Action Plans (EAP), Facility Emergency Action Plans (FEAPS), Records Emergency Plans (REP), Disaster Recovery Plans (DRP), and Pandemic Influenza Plans.

QUESTION RELATED TO GRS 5.3, ITEM 010

2. In the disposition instruction, what does “whichever is applicable” mean?

“Whichever is applicable” means you should apply whichever cutoff is appropriate for the records. If the records do not become superseded or obsolete, you should destroy them when they become 3 years old. Other records, such as a Memorandum of Understanding, may remain in place for many years then be superseded by a follow-on MOU or simply become obsolete. The retention clock for this kind of record begins at the time they become superseded or obsolete. You should destroy them 3 years after that point.

GRS 5.4, Facility, Equipment, Vehicle, Property, and Supply Records

QUESTION RELATED TO GRS 5.4, ITEM 010

1. Why does this item exclude General Services Administration (GSA) Global Supply requisition and supply records and Defense Logistics Agency (DLA) military supply records?

As noted in the item’s Exclusion 3, these are program records of agencies whose mission is supply. The GRS does not cover agency mission records; agencies must schedule such records. Also, 40 U.S.C. 501(a)(2) states that the Department of Defense can opt out of GSA procurement processes. A 1971 agreement between GSA and DLA sorted out which agency supplies which goods to military

establishments, based on whether the goods are deemed “military” in nature. For instance, reams of paper are not “military” but ammunition is. For this reason, these GSA and DLA records have agency-specific requirements that also make them inappropriate for a GRS.

QUESTIONS RELATED TO GRS 5.4, ITEM 020

2. Why does this item require agencies to transfer land title records to the new owner?

Once the Federal Government releases land to another owner, its title records lose their legal value for the Federal Government, and eventually informational value, too. But there is no good reason for the Federal Government to destroy these records when the new or subsequent owners, as the new stewards of the land, may have business use for them.

3. Why does this item not cover records of real property disposition (Exclusion 2)?

This item covers only very specific documents about real property *ownership*, not real property *disposition*. Disposing of real property by sale and donation is often the subject of national or local controversy. We cannot treat land disposition records consistently as a single series with identical value under all circumstances. They are therefore not appropriate to include in the GRS.

4. My agency has a schedule for real property disposition case files. Does this item supersede it?

No. As discussed in question 3, this item covers only very specific documents about real property *ownership*, not real property *disposition*. Real property disposition records merit unique appraisal.

5. My agency has a schedule to permanently retain real property disposition case files. My files incorporate the records item 020 says are temporary (abstract or certificate of title). Can I transfer these temporary records to NARA as part of the permanent files?

Only permanent records should be sent to the National Archives (NARA). If your real property disposition file has simply been incorporated into your ownership file for the same land/building, you should remove the temporary ownership records prior to proposing to transfer the permanent disposition records to NARA. The GRS instructs you to send these ownership records—abstract or certificate of title—to the new owner of the land. These records should not be in the files you transfer to NARA.

QUESTION RELATED TO GRS 5.4, ITEM 030

6. Why don't you include vehicle title in the list of covered records?

We do not include vehicle title as a covered record because it does not have the same disposition instruction as the other records. State law requires the seller to give a vehicle title to the new owner in the sale or release process. The GRS has no authority either to require transfer of a vehicle title, or to authorize its destruction.

QUESTIONS RELATED TO GRS 5.4, ITEMS 050 AND 051

7. Agencies must keep records in item 051 until a structure is removed from Federal ownership. However, the Government will never get rid of certain buildings. Isn't this *de facto* permanent retention?

The business use of records described in item 051 may stretch over many decades, but still ends with demolition, sale, *etc.* of the structure to which the records relate. However, Exclusion 2 makes clear that records documenting buildings of historical, architectural, or technological significance must instead be scheduled and appraised to determine their value, which might be permanent in some cases.

8. Why would an agency want to keep all construction records until a facility is razed? Isn't that excessive?

These items do not require all construction records to be retained for the life of a facility. Many records exist primarily to document the financial management of the contract(s) under which a building is erected. These are disposable under GRS 1.1, item 010, as noted in Exclusion 1. But other construction records have enduring value to a physical plant's maintenance crew. As-built drawings often vary significantly from final design drawings, reflecting numerous change orders. As a result, these records are useful for the life of the facility.

9. How can I tell if a building is historically or architecturally significant?

Criteria for establishing a structure's historical or architectural significance are available in the [National Register Bulletin 15](#), "How to Apply the National Register Criteria for Evaluation," published by the National Park Service, which is responsible for the National Register of Historic Places.

QUESTIONS RELATED TO GRS 5.4, ITEM 100

10. 14 CFR 91.417 contains a detailed list of records that agencies must retain and transfer with an aircraft when selling it. Why are these records not included in the GRS, citing 14 CFR 91.417 as the legal authority?

The records 14 CFR 91.417 requires agencies to transfer with an aircraft upon sale fall into two categories. The first is certain maintenance records, which the GRS covers under item 100. The second category is time-specific records that cannot be compiled as a discrete series until very near the date of transfer. A GRS item for records an agency creates and compiles for the sole purpose of immediate transfer outside of agency ownership would be pointless. The GRS does not cite 14 CFR 91.417 as a legal authority because, in keeping with GRS policy, we reference CFR and U.S. Code citations only if they directly address the length of time agencies must maintain the records.

11. In the disposition instruction for item 100, what does "disposing of aircraft" mean?

For purposes of this disposition instruction, "disposing of aircraft" means either its destruction or its sale, donation, or other permanent transfer to a non-Federal entity.

QUESTION RELATED TO GRS 5.4, ITEMS 100, 110, AND 120

12. Why do items 100 and 120 exclude records of the Air Force, Navy, Army, and Federal Aviation Administration, and item 110 exclude records of vehicles designed for military use?

Aircraft used by military branches and FAA are more likely to be involved with agency mission. A similar situation applies to item 110. Military organizations' fleets contain many commonly used vehicles such as cars and trucks, and records relating to such vehicles are covered by item 110. But the sole purpose of some vehicles (for example, amphibious assault vehicles) is intertwined with agency mission. They

are therefore excluded from item 110. Mission records are always scheduled by the creating agency.

QUESTION RELATED TO GRS 5.4, ITEM 140

13. How does this item relate to the very similar GRS 5.6, item 100, Accident and incident records?

Many vehicle accidents are likely to create records in both the office that manages the fleet and the office that deals with investigations. This item (GRS 5.4, item 140) schedules the former. GRS 5.6, item 100, covers the latter. These files may contain many records in common, but agencies retain them to document different business functions. For that reason, we have assigned them different retention periods based on agency need for the records.

GRS 5.5, Mail, Printing, and Telecommunication Service Management Records

1. Why does this schedule combine records of disparate communication methods, such as hard-copy mail, telephone, and radio, into unified items? Aren't these records fundamentally different?

Communication methods may differ and message formats may be wildly divergent. But at root, they all accomplish the same business process: they transmit information from point A to point B. What unifies these records is that they all relate to the same function: managing services that transmit information.

2. Why does this schedule specifically exclude actual information relayed by hard copy mail or packages, and telephone, email, text, or radio messages?

This schedule does not cover messages agencies send or receive by various communication services because agencies must schedule such messages based on their purpose and content. GRS 5.5 covers records of how the agency manages the means of transmitting information (the envelope) but does not cover the information itself (what is inside the envelope).

3. Why are records of agencies that provide printing and radio/broadcasting services as part of their mission activities not covered by this schedule?

A few agencies of the Federal Government—the Government Printing Office, the Bureau of Engraving and Printing, and Armed Forces Radio and Television Service are primary examples—provide communication services as their mission. Agencies must always schedule mission records in agency-specific schedules. This GRS covers records agencies create as consumers of communication services rather than those created in providing those services.

QUESTION RELATED TO GRS 5.5, ITEM 010

4. The disposition instruction gives two variant retention instructions to be used “as appropriate.” How do I determine what is “appropriate”?

Some records covered by this item concern agreements, which have start and end dates. The retention period for these records is 3 years after the agreement ends by expiration or cancellation. Records not linked to an agreement may be destroyed when simply 3 years old.

QUESTION RELATED TO GRS 5.5, ITEMS 010 and 020

5. What’s the difference between “telephone and mobile device use records” (item 010) and “telephone message registers and logs” (item 020)?

“Telephone and mobile device use records” (item 010, third bullet) document use of a particular instrument; the phone bill is one common example. “Telephone message registers and logs” (item 020, last bullet) are records of messages taken over the phone by third parties and forwarded to those with a need to know, or notes and logs a recipient makes to track their telephone messages. These registers and logs generally apply to multiple telephones.

QUESTIONS RELATED TO GRS 5.5, ITEM 020

6. How does this item relate to GRS 5.6, item 50, which covers “postal irregularities” records?

Mailrooms create records documenting incidents of mishandled mail. Some incidents are minor and may require no more attention than re-delivery to the correct address or apology for late delivery. These are covered by GRS 5.5, item 020. Other incidents—particularly if intentional mishandling is suspected—may be passed along to an investigative office. Mailrooms must retain *some* information about these more serious incidents in order to completely document their own business. Under item 020, a mailroom may choose to destroy records of all incidents—regardless of severity—when 3 years old. The investigative office to which the mailroom forwarded a copy of an incident case file retains records documenting the investigative work for 6 years under GRS 5.6, item 050. When different offices retain identical documents for different business purposes, they may require different retention periods.

7. Why are records tracking shipment, etc. (item’s first bullet), and reports of loss, etc. (third bullet), not covered by this item if held by the United States Postal Service (USPS)?

Tracking mail and package shipments and investigating reported losses are mission functions of the USPS. The GRS does not cover agency mission-specific records; the USPS must schedule records documenting its mission under an agency-specific schedule.

QUESTION RELATED TO GRS 5.5, ITEM 030

8. Why are metered mail records kept for so much longer than other mail control records, which are covered by item 020?

Metered mail records document an agency’s financial activity. We do not include them in GRS 1.1 because they relate more to the communication function than the financial management function. But because they are eligible for audit just like any other record documenting an agency’s finances, they must be retained for 6 years just like auditable records in GRS 1.1, item 010.

GRS 5.6, Security Management Records

1. What are the definitions of Federal law enforcement and Federal correctional activities in the context of the GRS?

We developed the framework for the current GRS using the [Federal Enterprise Architecture Business Reference Model taxonomy](#) (FEA BRM) (2013). The FEA BRM distinguishes between Federal law enforcement activities, Federal correctional activities, and security management activities.

Federal law enforcement activities include the following:

- Border and transportation security
- Fugitive and criminal apprehension
- Criminal investigation and surveillance
- Crime prevention
- Leadership protection
- Substance control enforcement
- Immigration and naturalization
- Criminal and terrorist threat mitigation
- Criminal management
- Executing court orders
- Witness protection

Federal correctional activities include incarceration, supervision, parole, and rehabilitation of federal prisoners.

This schedule excludes records that are related to the mission activities listed above. Agencies that conduct law enforcement or correctional activities as part of their mission, such as the Federal Bureau of Investigation, Bureau of Prisons, and Immigration and Customs Enforcement, among others, cannot apply this GRS to records related to these activities. However, such agencies should use this GRS for records they create and maintain about their facility and personnel security management activities, which are agency operational activities. This does not include security activities related to operating prison, jail, or detention facilities (which fall under the list above), even if those records are similar to security management records for the agency's facilities and personnel.

2. What is a Facility Security Level?

A Facility Security Level (FSL) is an estimation of the level of risk at a facility. See [The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard](#) (2021).

QUESTION RELATED TO GRS 5.6, ITEMS 060 and 061

3. What is the significance of the \$500 over/under threshold amounts identified in the item titles?

Unclaimed personal property becomes the property of the Government 30 days after being found. Agencies must keep documentation of personal property valued over \$500 for an additional three years from the date that title to the property vests in the Government to allow time for the former owner to file a claim.

QUESTION RELATED TO GRS 5.6, ITEM 140

4. What is a "TEMPEST Checklist"?

A TEMPEST Checklist is a form agencies use to ensure they meet certain security requirements. TEMPEST refers to investigating, studying, and controlling compromising emanations from telecommunications and automated information systems equipment (DoDM 5105.21-V2, October 19, 2012, page 41).

QUESTION RELATED TO GRS 5.6, ITEMS 170 and 171

5. What is the difference between items 170 and 171?

The difference is that item 171 covers investigations your agency conducts under authority delegated from the Office of Personnel Management (OPM) or similar organization, and item 170 covers investigations another agency conducts for your agency. Item 171 provides disposition authority for records created by agencies holding delegated authority. All other agencies should use item 170.

6. How do I know if my agency has “delegated investigative authority”?

Contact your agency’s personnel security office. They should also know the agreed-upon retention period for the investigation reports.

QUESTION RELATED TO GRS 5.6, ITEMS 210 THROUGH 240

7. What is an insider threat?

An insider threat is the potential that an employee, contractor, or other person with authorized access to a Federal agency “will use his/her authorized access, wittingly or unwittingly, to do harm to the security of the United States. This threat can include damage to the United States through violent acts, espionage, terrorism, unauthorized disclosure of national security information, or through the loss, denial or degradation of departmental resources or capabilities” (Defense Security Service Regulation, Number 05-06, January 30, 2014, page 14).

QUESTION RELATED TO GRS 5.6, ITEM 230

8. Twenty-five years is too long for my agency to keep insider threat information. How do we request a shorter retention period?

Your agency is welcome to submit an agency-specific records schedule following its normal procedure. The schedule should include a justification for deviating from the GRS. Since the GRS establishes a legal minimum retention period for similar records across the Government, your agency’s general counsel needs to review and approve any agency-specific schedule requesting to keep the records for a shorter time than the 25-year threshold.

QUESTION RELATED TO GRS 5.6, ITEMS 230 and 240

9. What is the difference between items 230 and 240?

Item 230, Insider threat information, covers the insider threat program routine data collection, which is sometimes referred to as a “hub.” An agency’s data collection is an aggregation of records used for trend analysis. Most of these records are not unique, but are copies of other records.

Item 240, Insider threat user activity monitoring (UAM) data only exists for national security systems. It collects network data about users of national security systems to support detection of behavioral patterns and relationships with other insider threats.

GRS 5.7, Administrative Management and Oversight Records

QUESTION RELATED TO GRS 5.7, ITEM 010

1. Why do you exclude reports related to agency mission activities and consolidated final agency reports submitted to OMB or Congress?

We exclude these records from the GRS because, depending on the agency's mission, they may be of permanent value for historical research. That is why agencies must schedule them individually.

QUESTION RELATED TO GRS 5.7, ITEM 040

2. Does this item cover records created in the course of processing and submitting reports?

No. This item covers only the records administering a report's framework: why it exists, why it must be prepared and submitted, what subject matter it must include, how it is formatted, and similar parameters. In other words, these are records about the report's existence and structure. This item does not cover the final product (a prepared and submitted report) or the process whereby a particular report is assembled. Agencies must schedule those records based on the report's subject matter and the value of its information to both the agency's business processes and the Federal Government's historical record.

QUESTIONS RELATED TO GRS 5.7, ITEM 060

3. Why do you exclude records created and held by the Merit Systems Protection Board and the Office of Special Counsel from this item?

Handling cases described by this item is the mission of the Merit Systems Protection Board and the Office of Special Counsel. Agencies must schedule mission records independently. GRS 5.7, item 060, covers only case files created at other agencies, where they are administrative records.

4. Why do you exclude from this item records of whistleblowing cases handled internally within an agency?

The administrative and historical value of allegations of illegality, waste, corruption, or other misconduct reported to authorities within an agency varies from one agency to another, so cannot be defined by a single universal retention period. For example, honesty and good behavior of staff is expected in all agencies, but is mission-critical in law-enforcement and investigative agencies. Agencies must therefore individually schedule records documenting internal handling of misconduct allegations.

QUESTION RELATED TO GRS 5.7, ITEM 080

5. Why do you exclude records received by the General Services Administration, the Office of Management and Budget, and the Office of the Federal Register from this item?

The records concern the mission of those three agencies. As with all mission records, they must be appraised and scheduled for their business and historical value by the agencies themselves.

GRS 5.8, Administrative Help Desk Records

1. Why are GRS 5.8 Administrative Help Desk Records and GRS 6.5 Public Customer Service Records two separate schedules?

The two schedules reflect different functions. Administrative help desk records document

administrative support. Public customer service records document support of an agency's mission activities. That is why these schedules appear separately.

GRS 6.1, Email Managed under a Capstone Approach

See webpage [here](#).

GRS 6.2, Federal Advisory Committee Records

TERMS USED IN THIS SCHEDULE

1. What is the Federal Advisory Committee Act?

The Federal Advisory Committee Act (FACA) as amended (5 U.S.C. Appendix 2) is the law that provides the framework for how agencies create and manage Federal advisory committees. Congress enacted the law in 1972 to ensure that agencies receive objective advice from the various advisory committees formed over the years, and that the public can access it. The Act formalized a process for establishing, operating, and terminating these advisory bodies and created the Committee Management Secretariat to oversee compliance with the Act.

2. What is a Federal advisory committee?

In general terms, a Federal advisory committee is a committee established by statute or reorganization that provides advice or recommendations to the President, any agency, or Federal Government officers, and isn't made up solely of Government employees. The official legal definition contains more specific details and an exception for two organizations, so you should consult the Federal Advisory Committee Act (5 U.S.C. Appendix 2) or your agency's FACA counsel for more details.

3. What is a Presidential advisory committee?

A Presidential advisory committee is a Federal advisory committee authorized by Congress or directed by the President to advise the President. Presidential advisory committees may or may not be subject to the Federal Records Act, which governs the records covered by the General Records Schedules. An agency should check with its general counsel before applying GRS 6.2 to Presidential advisory committee records. In some cases, these records may be Presidential records subject to the Presidential Records Act rather than to the Federal Records Act. For additional information concerning records of Presidential advisory committees, see question 8 below.

4. What is a sponsoring agency or department for a committee?

A sponsoring agency or department provides the staff and administrative and monetary support for a Federal advisory committee.

5. What is a committee management officer (CMO)?

Sponsoring agency heads designate a committee management officer (CMO) to oversee FACA administration at that agency. FACA administration includes establishing committees, setting procedures, determining goals and monitoring committee accomplishments ; assembling and

maintaining committee reports, records, and other papers; and carrying out, on behalf of that agency FACA's requirements with respect to those records (5 USC Appendix 2 - Sec. 8(b)).

In addition to implementing the provisions of section 8(b) of the Act, the CMO carries out any other responsibilities the agency head delegates. The CMO also ensures that the agency implements sections 10(b), 12(a), and 13 of the Act for appropriate recordkeeping.

6. What is a designated Federal officer (DFO)?

The agency head designates a DFO for each advisory committee. The DFO implements advisory committee procedures under the supervision of the CMO, including sections 10(e) and (f) of the Act. (41 CFR 102-3.25) Consistent with 41 CFR 102-3.120, a DFO:

- approves or calls the meeting of the advisory committee or subcommittee;
- approves the agenda, except that this requirement does not apply to a Presidential advisory committee;
- attends the meetings;
- adjourns any meeting when he or she determines it to be in the public interest; and
- chairs the meeting when so directed by the agency head.

7. What are “substantive” records?

Substantive records document decisions, discussions, or actions a committee takes. They are covered by items 010 and 020.

GENERAL QUESTIONS ABOUT GRS 6.2

8. How can I tell if a committee is a FACA committee?

You should check with your agency's FACA counsel to confirm if a specific group falls under FACA or not. In order to fall under FACA, the group must be established as a Federal advisory committee according to the Federal Advisory Committee Act (FACA) as amended (5 U.S.C. Appendix 2). In general, the authority to create FACA committees derives from statute, the President, or agency authority, and each Federal advisory committee must have a current, filed charter in order to meet or take any action. Some FACA committees predate the FACA and were grandfathered under it.

9. Are records of Presidential advisory committees covered by the GRS?

Records of Presidential advisory committees are covered by this GRS under most circumstances. You should check with your agency's FACA counsel to determine if a Presidential advisory committee's records fall under the Presidential Records Act (PRA) or the Federal Records Act (FRA). If the latter, you may apply this GRS. If the records fall under the Presidential Records Act (PRA), you should request information on appropriate disposition from NARA's Presidential Materials Division at 202-357-5200 or presidential.materials@nara.gov.

GRS 6.2 RECORDS MANAGEMENT

10. What records must committee management officers (CMOs) create or maintain?

According to 41 CFR 102-3.115, the CMO must keep records that include, but are not limited to:

- *Charter and membership documentation.* A set of filed charters for each advisory committee and membership lists for each advisory committee and subcommittee;

- *Annual comprehensive review.* Copies of the information provided as the agency's portion of the annual comprehensive review of Federal advisory committees, prepared according to 41 CFR 102–3.175(b);
- *Agency guidelines.* Agency guidelines maintained and updated on committee management operations and procedures; and
- *Closed meeting determinations.* Agency determinations to close or partially close advisory committee meetings required by 41 CFR 102–3.105.

11. What records are designated Federal officers (DFOs) or similar agency officers maintaining committee records supposed to maintain?

DFOs or similar agency officers should maintain the official records an advisory committee creates or receives as long as the committee exists (41 CFR 102-3.175). This includes records such as correspondence between committee members and others that relate to the committee's decisions or actions.

12. Why must an agency capture and maintain as a permanent record in item 010 the correspondence, including email, documenting discussions, decisions, or actions related to the work of the committee?

Exchanges of substantive information between members regarding the work of the committee or subcommittee are records that reflect the work of the committee and document its thought processes, and, if enough members are involved in the communication (even if by email), the exchange could be considered a FACA meeting. The schedule is clear that the exchanges should be substantive, i.e., they involve the work of the committee, rather than something like a scheduling email.

13. How does 44 USC 2911, which relates to the use of unofficial email accounts to conduct agency business, apply to members of a committee who are not Federal employees?

Committee members who do not have an agency email account should copy the DFO on email correspondence related to the committee's work so that a Federal official appropriately manages the records.

14. Why are some committee records transferred to NARA and others destroyed?

NARA does not preserve all Federal records. We accept for transfer to NARA only records designated as having historical value warranting continued preservation. These include records that document significant decisions and actions of FACA committees. Other records, such as administrative or logistical records, have short-term business use but do not warrant permanent preservation and agencies can therefore destroy them as directed in an approved records schedule such as GRS 6.2.

15. May committee records be withheld under FOIA?

Advisory committee records are generally not restricted under FOIA. Section 10(b) of the Federal Advisory Committee Act (FACA), as amended (Public Law 92-463, 5 U.S.C. Appendix 2), provides that: "Subject to section 552 of title 5, United States Code, the records, reports, transcripts, minutes, appendixes, working papers, drafts, studies, agenda, or other documents which were made available to or prepared for or by each advisory committee shall be available for public inspection and copying at a single location in the offices of the advisory committee or the agency to which the advisory committee reports until the advisory committee ceases to exist."

Advisory committee records may be withheld under FOIA if there is a *reasonable expectation* that the records sought fall within the exemptions contained in section 552(b) of FOIA. However, agencies may not require members of the public or other interested parties to file requests for non-exempt advisory committee records under the request and review process established by section 552(a)(3) of FOIA (41 CFR 102-3.170). Agencies must make those records available as stated in the paragraph above.

16. My committee maintains copies of its records on the committee's web page. How should these records be managed?

How an agency manages records on a web page depends on whether the records are considered the recordkeeping copy (or the only copy) or not. If a committee maintains multiple copies of the same records, especially when those copies are also on committee web pages, it should determine which copy will be the recordkeeping copy. You transfer that copy, whether electronic or hardcopy, to NARA if the records are permanent. If the committee designates the copy on the web page as the recordkeeping copy, you apply the appropriate item from GRS 6.2. If the copy on the web page is not the recordkeeping copy, you may destroy it at any time as long as your agency maintains the recordkeeping copy (see GRS 5.1, item 040).

GRS 6.2 SCHEDULE IMPLEMENTATION

17. My agency has long-standing FACA committees that predate creation of the GRS for FACA committee records, so we have agency-specific schedules for FACA committee records. Should my agency use the GRS or our agency-specific schedules?

GRS 6.2 applies to records of all FACA committees and supersedes all existing schedules related to FACA committees, including agency-specific ones.

18. What should I do with extra copies of committee records?

Whether you may dispose of extra copies depends on the copy. If the copies of records from committee members have substantive notes or comments, they have unique content and you should transfer them to NARA under GRS 6.2, item 010 (unless they are related to a grant review committee). Extra copies that are only for reference use are non-record materials and you may destroy them at any time.

19. There is no longer a specific item for committee websites on the schedule. How should committee websites be disposed of?

See the answer to question 21.

20. My committee has both paper and electronic copies of records. Which version should we keep?

The sponsoring agency determines which records -- paper or electronic -- it will maintain as the recordkeeping copy. Agencies should transfer only the recordkeeping copy of permanent records to NARA. Permanent electronic records must meet NARA's transfer guidelines for electronic formats. Agencies may have to keep some records in paper format. You should consult with your agency general counsel to determine whether there is a legal reason to maintain recordkeeping copies in a particular format.

21. My committee has both paper and electronic copies of records with original signatures. Do we

have to keep the paper records?

Your agency must keep the paper records only if there is a legal reason to do so. Consult with your agency general counsel to determine if you must keep the paper records containing original signatures.

22. My committee is shutting down but has administrative records covered by General Records Schedules other than GRS 6.2 that cannot be destroyed yet. What should I do with these records?

You should contact the records officer for your committee's sponsoring agency to arrange to store and manage the records after the committee shuts down.

TRANSFERRING PERMANENT RECORDS

23. How are permanent FACA committee records transferred to NARA?

You should transfer permanent FACA committee records to NARA using an SF-258. Agencies cannot currently use ERA to transfer permanent records covered by the GRS. Submit with the SF-258 a copy of the committee charter that applies to the time period in which the records were created. Also fill out and submit the GRS 6.2 "Checklist for Preparing Permanent Records for Transfer to NARA." You should also include box and folder lists in the transfer. Committee staff should consult with their agency records officer for more specific procedures. For additional information on transferring permanent records to the NARA facilities in the Washington, DC, area please see the [Guidance and Policy for Accessioning Records to the National Archives in the Washington, DC Area](#).

24. What if my agency wants to transfer permanent records earlier than 15 years?

Except in the case of substantive audiovisual records covered under Item 020 (which requires transfer to NARA within 3 years), agencies wishing to transfer permanent FACA committee records for ongoing committees earlier than the 15 years stated in the GRS must submit a schedule to NARA requesting a deviation from the GRS that includes a justification for transferring records sooner. An agency must also submit a schedule if it wishes to pre-accession electronic FACA committee records (transfer physical custody, but not legal custody). Submit schedules to your agency's NARA appraisal archivist. Transfer to NARA records for committees that are terminating upon termination.

QUESTIONS RELATED TO GRS 6.2, ITEM 010

25. Item 010 includes records related to committee hearings. What if my committee does not conduct hearings?

Because it is uncommon for FACA committees to have the authority to hold hearings, most committees can be expected not to have hearing-related records. Hearing records are included in the schedule to make it clear for those committees that do hold hearings that their records related to hearings are permanent.

26. Are comments made by committee members on social media considered permanent?

If the comments reflect deliberations between committee members then they are a permanent record under GRS 6.2, item 010. The comments need not be captured in social-media format as long as they are captured in some other way.

QUESTION RELATED TO GRS 6.2, ITEMS 010 AND 020

27. Why do substantive audiovisual records have only a 3-year transfer period when other substantive committee records have a 15-year retention period?

FACA committees retain audiovisual records for a shorter period of time prior to transfer to NARA because the records are more fragile and susceptible to damage or loss of accessibility over time. This shorter time is acceptable for access reasons because special media records tend not to contain personally identifiable information (PII) or other restricted information, so the risk of release explained in Question 29 isn't an issue.

QUESTION RELATED TO GRS 6.2, ITEM 030

28. Why are grant review FACA committee records temporary?

During appraisal, we found that FACA committees whose sole purpose was grant review tended to create voluminous amounts of records (due to the number of meetings) that captured very little information (because of the proprietary nature of information contained in many grant applications and the need to protect the identity of those that reviewed each grant). Therefore, we determined that the records of these committees do not warrant permanent retention.

QUESTION RELATED TO GRS 6.2, ITEM 040

29. Why is there a separate item for committee accountability records?

Committee accountability records are non-substantive records. They are separate from other non-substantive committee records because agencies must keep them for 6 years for accountability purposes (these records are related to financial and ethics records, which also have 6-year retention periods in GRS 1.1 and GRS 2.8 for accountability purposes). By separating these records from other non-substantive records, this item gives agencies the flexibility to dispose of the other records sooner. If agencies want a simpler schedule, they may combine items 040 and 050 into a single item for non-substantive committee records and maintain everything for 6 years (the longest retention period of the two items).

QUESTIONS RELATED TO GRS 6.2, ITEM 050

30. This item says that records may be destroyed “when superseded, obsolete, no longer needed, or upon termination of the committee, whichever is sooner.” My agency has always liked keeping these records for 3 years. Do I have to destroy the records sooner now?

No. If an agency finds that its business needs are best met by a 3-year retention period, it may still keep administrative records for 3 years. The new GRS disposition instruction leaves it up to agencies to determine when these temporary records can be destroyed: either when they are superseded, obsolete, no longer needed, or upon termination of the committee. The only stipulation is that records should be destroyed upon termination of the committee at the latest. If an agency wants to require committee staff to maintain these records for 3 years or until the committee is terminated, whichever is shorter, it should indicate this retention period in the agency records disposition manual or instructions.

31. Can agencies dispose of certain committee administrative records in accordance with other appropriate General Records Schedules?

Advisory committees should dispose of certain administrative records it creates or receives – records relating to budget, personnel, procurement, information technology management or similar housekeeping or facilitation functions –in accordance with another GRS because they are not substantive records and they do not pertain to the subject matter advice that the advisory committee provides to the Government. Upon termination of the committee, committees should transfer to the sponsoring agency any administrative records that another GRS authorizes for disposal that have retention periods outlasting the life of the committee (such as payroll, personnel and fiscal records) .

32. Can Federal Register notices announcing a meeting be destroyed once the meeting is over?

Yes. GRS 6.2, item 050, includes drafts and copies of Federal Register notices. The Federal Register itself is the recordkeeping copy; therefore there is no need for agencies to keep copies or drafts of notices beyond their business use. In the case of copies of the notices, that would most likely be at the conclusion of the meeting.

GRS 6.3, Information Technology Records

QUESTIONS RELATED TO GRS 6.3, ITEM 010

1. Why are there so many exclusions to this item? How are the excluded records scheduled?

When multiple activities or categories of records are aggregated, the need for additional schedule item exclusions often increases. The excluded records may be considered permanent under certain circumstances or may be more appropriately covered by another existing records schedule, either a GRS item or an agency-specific item.

GRS 6.4, Public Affairs Records

QUESTIONS RELATED TO GRS 6.4, ITEM 020

1. What are “routine complaints or commendations”?

Routine complaints and commendations are those that come from the public on an *ad-hoc* basis, are not solicited, and do not require further action from the agency.

2. This item includes agency postings on social media accounts as well as comments an agency receives on its website. How can an agency dispose of these records on sites it does not control?

Because agencies often cannot destroy comments or posts on social media, this item applies only if the agency does have control or captures the records. NARA does not expect agencies to destroy social media records that they do not control. However, agencies do need to manage their social media records. NARA provides guidance on managing social media records in [NARA Bulletin 2014-02](#).

3. Why does this item cover comments agencies *do not* act on, but does not cover comments that agencies *do* act on?

Comments agencies do not act upon have limited business value and generally no historical value.

Comments that require action may have significant business value and potential historical value. As such, we cannot universally declare them either permanent or temporary, so we do not include them in the GRS.

QUESTION RELATED TO GRS 6.4, ITEM 030

4. Why does Exclusion 1 omit common records such as speeches, publications, and agency histories from Item 030?

Many records created under the public affairs function cannot be declared universally temporary or universally permanent across the entire Federal Government. Therefore, agencies must schedule them individually. We have provided guidelines for how agencies can determine whether specific record types are permanent or temporary in our guide "[Scheduling Public Affairs Records.](#)"

GRS 6.5, Public Customer Service Records

1. Why are GRS 6.5 Public Customer Service Records and GRS 5.8 Administrative Help Desk Records two separate schedules?

The two schedules reflect different functions. Administrative help desk records document administrative support. Public customer service records document support of an agency's mission activities. That is why these schedules appear separately.

QUESTION RELATED TO GRS 6.5, ITEM 020

2. Item 020 covers records that likely include personally identifiable information (PII). Why do you not include instructions for how agencies should handle PII?

The GRS provides instructions for how long agencies must retain records, but does not prescribe how agencies should otherwise manage their records. Agencies should include handling of PII, a form of Controlled Unclassified Information (CUI), in their policies and procedures, in accordance with Government-wide CUI requirements.