

# Frequently Asked Questions of Individual GRS Schedules

## December 2019

### GRS 1.1, Financial Management and Reporting Records

#### QUESTIONS RELATED TO 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 However, you must cite the GRS item as the authority for whichever retention period you use, not the superseded agency schedule.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."<sup>1</sup> 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

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

financial transaction records.

## **QUESTIONS RELATED TO 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 ITEM 013**

### **7. Why does this item cover only an agency's copy of the data it submitted to FPDS, but not the master data held in FPDS itself?**

The GRS covers records common to multiple agencies. FPDS is a system owned by the General Services Administration (GSA). Although multiple agencies own and submit the system's source data, once collected in FPDS the data is unique to GSA and GSA must schedule it. As a result, the GRS does not cover the data within the FPDS. GSA's FPDS master data is permanent under N1-137-96-1, item 1. For this reason, agency-retained copies of their own submitted data are temporary.

## **QUESTION RELATED TO ITEM 020**

### **8. 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."

### **9. 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 ITEM 030**

### **10. 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.

#### **QUESTION RELATED TO ITEM 060**

##### **11. Why did you schedule contract dispute records both here and in GRS 6.7, item 020? Why are the retention periods so dramatically different?**

Per 41 U.S.C. 7103, when someone appeals a decision arising under the Contracts Dispute Act, the agency contracting officer issues the final decision on the appeal. GRS 1.1, item 060, covers records the contracting officer creates in the course of that appeal. GRS 6.7, item 020, covers the case file the agency’s General Counsel creates while representing the agency in both the original lawsuit and the appeal. General Counsel’s 7-year retention period ensures records survive through the time period in which a person may file an appeal. Retaining the contracting officer’s records for 1 year after the decision is sufficient because the matter is not subject to further litigation.

#### **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**

## **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 GRANTSOLUTIONS.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 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 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 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 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 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 ITEMS 030 AND 031**

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

**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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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**

### **QUESTION RELATED TO 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.

## **GRS 2.4, Employee Compensation and Benefits Records**

### **QUESTION RELATED TO “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 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 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 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 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 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 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 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 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 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 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 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 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 ITEM 030**

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

GRS 2.6, item 030, Individual employee training records, covers most individual employee training records, but does not include individual occupational health and safety training records (see GRS 2.6's introduction), which GRS 2.7, item 030, covers instead. There are two reasons for this: first, occupational health and safety records are specialized training records that document an agency's program objectives or illustrate program operations, unlike the other kinds of training records covered by GRS 2.6, item 030. Also, agencies must keep one type of occupational health and safety records (hazardous waste program training (HAZWOPER) records) for at least years, per 29 CFR Part 1910.120 Appendix E(9), so GRS 2.6, item 030's 3-year retention period is not adequate.

## **QUESTION RELATED TO ITEMS 060 and 061**

### **2. Whose records do these items cover?**

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

## **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 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 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 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 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 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.

**Computer incident (item 020)** within the Federal Government is defined by NIST Special Publication 800-61, *Computer Security Incident Handling Guide, Revision 2* (August 2012), as a violation or imminent threat of violation of computer security policies, acceptable use policies, or standard computer security practices.

**Significant computer incident (item 020)** requiring scheduling of records outside of this GRS would be defined as one that caused widespread system outage or denial of service, or gained notice by local news media, law enforcement, or the agency's Inspector General's office.

**System access records (items 030 and 031)** are those created as part of the user identification and authorization process to gain access to systems. Records are used to monitor inappropriate systems access by users.

**System backups (items 040 and 041)** are files maintained for potential system restoration in the event of a system failure or other unintentional loss of data.

**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.

**Electronic signature (items 060, 061, and 062)** is a technologically neutral term indicating various methods of signing an electronic message that (a) identify and authenticate a particular person as source of the electronic message and (b) indicate such person's approval of the information contained in the electronic message (definition from Government Paperwork Elimination Act, Public Law 105-277). Examples of electronic signature technologies include PINs, user identifications and passwords, digital signatures, digitized signatures, and hardware and biometric tokens. (See Appendix A, [Records Management Guidance for Agencies Implementing Electronic Signature Technologies](#), NARA, October 18, 2000)

## **GRS 4.1, Records Management Records**

### **QUESTION RELATED TO 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 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 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.

### **QUESTION RELATED TO ITEM 050**

#### **4. Why has this item been added to the GRS?**

This item provides disposition authority for validation records associated with digitizing projects. These validation records did not previously exist and thus were not scheduled, so we've added this item to schedule them. A recent revision to 36 CFR 1236, Electronic Records Management, establishes a requirement for agencies to validate digitized temporary Federal records before destroying the original source records and to "document the validation process and retain that documentation for the life of the process or the life of any records digitized using that process, whichever is longer" (§ 1236.24(c)). These new records are common to many agencies and are thus appropriately scheduled under the GRS.

### **GRS 4.2, Records of Information Access and Protection**

#### **QUESTION RELATED TO ITEM 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 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 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 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 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 post 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 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 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 5.1, Common Office Records**

#### **QUESTIONS RELATED TO 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**

For more information on applying this item to electronic messages, see [Frequently Asked Questions \(FAQs\) about Transitory Records in Electronic Messages](#).

**1. 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. To assist agencies that do not want to declare these materials non-record, we have crafted this item to clearly distinguish and designate them as records of a transitory nature.

### **QUESTIONS ABOUT ITEM 020 – INTERMEDIARY RECORDS**

**2. What constitutes a meeting in the second bullet in item 020?**

A meeting, for the purposes of this schedule, is a gathering (whether in person, via telephone, online meeting space, other means, or combinations of these) of a board, commission, advisory group, committee, task force, or other assemblage of Federal employees (or employees and members of the public), at which agency business is transacted or discussed. This definition includes staff meetings but does not include interrogations, interviews, or other situations whose purpose is to subject individuals to questioning.

**3. What are input or source records in the fourth bullet in item 020?**

Input records are the sources of information agencies enter into an electronic system. They support creating, updating, or modifying master files an agency keeps for recordkeeping purposes. Input records may be electronic files or hardcopy (non-electronic) documents. They may include records such as upload files staged for ingest into a system or hardcopy forms scanned or otherwise entered into the system.

Not all input processes create separate records. Input processes that do *not* create a separate input record include:

- Structured data the user enters from online forms, and unstructured (textual) data that is born digital (*i.e.*, not scanned from paper).
- Data moved automatically from another system with no associated data file. Thus, the data is copied from one system to the other without creating an intermediary data file. (For example, data are pulled from one system to populate another, and fields from System X are used to populate System Y.)

**4. Please explain the statement that to qualify as “intermediary,” a record must not be required to meet legal or fiscal obligations, or to initiate, sustain, evaluate, or provide evidence of decision-making.**

Generally, the final record to which an intermediary record contributes fills all recordkeeping needs. On rare occasion, an agency may require an intermediary record—for example, an original input/source document with a wet signature—to meet such obligations or to provide such evidence. In this case, the document is more than an intermediary record, and GRS 5.2, item 020, may not be used to dispose of it.

**5. Can an electronic system’s content ever 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.

**6. What does “verification of successful creation” mean in the disposition instruction for item 020?**

“Verification of successful creation” means that the agency has taken steps to ensure that hardcopy or analog records have been converted to electronic format in their entirety, that no information or pages are missing, all information is readable (especially in cases where records are scanned), and that the electronic version of the record can be opened. It is up to Federal agencies to define their verification procedures. NARA does not have specific requirements for how agencies should verify that they have successfully converted records to an electronic format.

**7. Why does this item’s fourth bullet include hardcopy input source documents only if we incorporate all information on the document into an electronic system?**

Unless all of the information in a hardcopy original is contained in its electronic counterpart, the electronic record does not fully duplicate the input record’s information. For example, if a hardcopy source record contains an annotation not clearly included in the scanned copy, the scan does not entirely duplicate the input record. The input record therefore contains unique information that may change its value and the agency should retain it.

Another example is data entered from a form. If not all of the form’s data is entered into the system, then the source record has not been copied in its entirety. One exception may be a form used to check a record already in the system. If information on the form already matches what is in the system, there is no need to update the information in the system. In that case, the source record is still being copied in its entirety because the information on the input form and in the system is the same. As long as all

the information in the source document has a one-to-one relationship to information in the electronic version and they match, the source record is being copied in its entirety.

**8. What are “inaccessible permanent records” in Exclusion 2? Why does item 020 exclude summarized information derived from such records?**

Electronic records may be scheduled as permanent but a given record may be lost, corrupted, or otherwise unopenable or unreadable. In that case, a data file output containing summarized information may be the only accessible version of the record, and NARA might want to take this output record in place of the inaccessible/unavailable permanent master record. This exclusion does not mean that 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 right now, and you have the output records, you should contact NARA to see if you should transfer the output records instead.

**9. Under what conditions are input records covered or not covered by item 020?**

The following two tables explain the conditions under which input records are covered or not covered by item 020. If the input records are in hardcopy format:

Input record description	Source already scheduled?	Limitations	Instruction
Hardcopy records entered or scanned into the system where the electronic version captures <i>all</i> information on the hardcopy, such as: <ul style="list-style-type: none"> <li>● Data entered into system from a paper form</li> <li>● Scanned images/ PDFs of hardcopy records</li> </ul>	Yes; scheduled as permanent	Schedule states that records must be transferred in hardcopy.	These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.
		Electronic version does not meet NARA transfer standards.	These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.
		Schedule does not require hardcopy transfer or is silent on format of records to be transferred to NARA and electronic format meets transfer standards.	Use GRS 5.2, item 020. However, these records fall under Note 1 and may not be destroyed until 60 days after submission of a notification to NARA per 36 CFR 1225.24(a)(1) <u>and</u> verification of successful creation of the electronic version, but longer retention is authorized if required for business use.
	Yes; scheduled as temporary		Use GRS 5.2, item 020. Destroy immediately after verification of successful creation of the electronic version, but longer retention is authorized if required for business use.
	No		Use GRS 5.2, item 020. However, these records fall under Note 1 and the electronic records must be scheduled prior to destruction of any input or source records <u>and</u> after verification of successful conversion, but longer retention is authorized if required for business use.

<p>Hardcopy records converted to electronic format but containing information not captured in electronic version, such as:</p> <ul style="list-style-type: none"> <li>● Records with handwritten annotations</li> <li>● Records with layered attached notes</li> <li>● Color-dependent documents captured electronically only in black-and-white</li> </ul>	Yes		These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.
	No		These records are not covered by the GRS. Input record must be scheduled because it is unique.
<p>Hardcopy records where the electronic version does not replace the source record, such as:</p> <ul style="list-style-type: none"> <li>● A case tracking system in which users input information from source documents, but the documents themselves remain a distinct entity outside the system</li> </ul>	Yes		These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.
	No		These records are not covered by the GRS. Input record must be scheduled because it is unique.

If the input records are in electronic format:

Description of input records	Limitations	Instruction
<p>Electronic records used to create or update a master file, such as:</p> <ul style="list-style-type: none"> <li>● Work files</li> <li>● Valid transaction files</li> <li>● Intermediate input/output records</li> </ul>		Use GRS 5.2, item 020. Destroy immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.
<p>Electronic records entered into system during an update process, such as:</p> <ul style="list-style-type: none"> <li>● Copies of data files or records from another system maintained by the agency</li> </ul>	Required for legal or audit purposes.	These records are not covered by the GRS. The input records must be scheduled.
	Not required for legal or audit purposes.	Use GRS 5.2, item 020. Destroy immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.
<p>Electronic records received from another agency and used as input/source records, such as:</p> <ul style="list-style-type: none"> <li>● Copies of data files or records from a system in another agency</li> </ul>	Produced under an interagency agreement or created for specific information needs of receiving agency.	These records are not covered by the GRS. The input records must be scheduled.

	Neither produced under an interagency agreement nor created for specific information needs of receiving agency.	Use GRS 5.2, item 020. Destroy immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.
Uncalibrated and unvalidated data collected in observation or measurement activities or research and development programs, such as: <ul style="list-style-type: none"> <li>• Scientific observational data from satellites</li> <li>• Research experimental test data</li> </ul>		Use GRS 5.2, item 020. Destroy immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.
Electronic source records scheduled elsewhere and the system does not replace the source record, such as: <ul style="list-style-type: none"> <li>• A case tracking system in which users input information from electronic source records, but the records themselves remain a distinct entity outside the system</li> </ul>		These records are not scheduled in the GRS. Apply source system's existing authority or schedule source system if unscheduled.

**Note:** The agency must either schedule any electronic files it creates specifically from one system as an input to another system or dispose of them using GRS 5.2, item 020, regardless of whether the originating system is scheduled. The disposition authority for the original system is not a valid authority for input files the agency creates from that system.

**10. When is it not appropriate to destroy input records according to item 020 once they are converted to an electronic format?**

Agencies may find that in certain circumstances they have a business need for the source records even after they have converted the records to an electronic format. In such cases, agencies may determine that it is not appropriate to apply the GRS for converted input/source records. Agencies should assess their business need for the source records and may establish a longer retention period in their agency-specific disposition manuals without additional NARA approval. In some cases, source records may be or become part of another records series scheduled on an agency-specific schedule. In these cases, the agency-specific schedule should be applied rather than item 020. For example, if the source record is part of another record, such as a case file, but the electronic version of the record is not a copy of the entire case file or has a separate purpose from the case file, then an agency-specific case file disposition authority, rather than item 020, may apply to the source record.

**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 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 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 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 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 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 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 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 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 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 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 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 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 Records**

**1. 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](#) (August 2013, 1<sup>st</sup> Edition).

**QUESTION RELATED TO ITEMS 060 and 061**

**2. 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. Documentation of personal property valued over \$500 must be kept for an additional 3 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 ITEM 070**

**3. Why are the Interagency Security Committee member records retained for 10 years?**

The Department of Homeland Security's Interagency Security Committee recommends a minimum retention period of 10 years for these records, as stated in [Facility Security Committees: An Interagency Security Committee Standard](#) (January 1, 2012, 2nd Edition), page 22.

**QUESTION RELATED TO ITEM 140**

**4. What is a "TEMPEST Checklist"?**

A TEMPEST Checklist is a form used to meet certain security requirements. TEMPEST refers to the investigation, study and control of compromising emanations from telecommunications and automated information system equipment (DoDM 5105.21-V2, October 19, 2012, page 41).

## **QUESTION RELATED TO ITEMS 170 and 171**

### **5. What is the difference between items 170 and 171? How do I know if my agency has “delegated investigative authority”?**

The difference is whether an agency relies on another agency to conduct investigations (item 170) or conducts its own investigations under authority delegated from the Office of Personnel Management (OPM) or similar organization (item 171). Your agency’s personnel security office can tell you your agency’s delegated authority status and the agreed-upon retention period for the investigation reports. Item 171 provides disposition authority for records created by those agencies holding delegated authority. Item 170 should be used by all other agencies.

## **QUESTION RELATED TO ITEMS 210 THROUGH 240**

### **6. 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).

## **QUESTIONS RELATED TO ITEM 230**

### **7. Some of the documents included under this item have shorter retention periods as personnel records under various items in GRS 2.2, 2.3, and 2.4. . Which takes precedence: other GRS items with shorter retention periods or the GRS 5.6, 25-year retention period required in item 230?**

Item 230 covers *copies* of certain Human Resources (HR) records collected by an insider threat program for a unique business purpose. The original records held by the HR office remain scheduled under other GRS schedules. Copies of the same record may be retained by different offices for different time periods. Each copy documents a separate business function.

### **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, we request your agency’s general counsel sign off on any agency-specific schedule requesting to keep records beneath the 25-year threshold.

## **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**

#### **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](mailto:presidential.materials@nara.gov).

### **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).

**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 be 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?**

See the answer to question 21.

**20. My committee has both paper and electronic copies of our records. Which version should be kept?**

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 the paper records have to be kept?**

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 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 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 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 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 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 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 added exclusions to a schedule item 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 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 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 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.

## **GRS 6.6, Rulemaking Records**

**1. Why do you exclude rulemaking docket records from this schedule?**

The GRS does not cover dockets because we can neither state a universal value for all dockets, nor create universally applicable criteria for identifying permanent and temporary dockets across all agencies. Some rules deal with minor issues and once they are in place, it may not be necessary to remember with great detail the whole story of how they were crafted. Other rules leave huge footprints in the story of the nation, its Government, and its landscape (literally and figuratively).

**QUESTION RELATED TO ITEM 010**

**2. The exclusion to item 010 sounds like records might or might not be disposable under this item. Please explain.**

A rulemaking docket might include any of the records listed in item 010. Some docket contents are typical, but agencies have a great deal of discretion as to what they place in such dockets, particularly if the docket and records are paper-based. However, the GRS does not cover rulemaking dockets (see Q1 above), so agencies must schedule these dockets under agency-specific schedules. Therefore, when one of the listed records becomes part of a docket, it is not covered by the GRS or this item; it is instead covered by the agency-specific schedule covering the docket. If one of the listed records is *not* included in a rulemaking docket, however, item 010 provides authority to dispose of it as background material the agency does not include in a docket--usually much sooner than the docket itself.

**3. Can my agency retroactively remove records from a docket if this or any other item in GRS 6.6 covers them?**

Yes. Even if your agency has scheduled its dockets as permanent records, you can remove any material covered by an item in GRS 6.6 prior to transferring the dockets to NARA. The exclusion to item 010 exists so that you are not *required* to sift dockets for material covered by items in GRS 6.6, but you are welcome to do so if you choose.

**QUESTION RELATED TO ITEM 020**

**4. These look like very important records. Why is the retention period so short?**

These are extra copies of records that have been published in the *Federal Register (FR)*. The published *FR* is scheduled as permanent by N1-64-87-1, items 1506-1 and 1506-2. One-year retention periods for GRS 6.6, item 020, covers the need to document what an agency intended to publish (in the unlikely event that what actually appears in the *FR* is not identical), or needs temporarily for ease of reference, to track publication frequency, or other business purpose. Since an agency—and researchers—can always obtain the exact text of the documents from the *FR* itself, the agency copy has no historical or research value. A flexible retention period for these records allows agencies to retain them as long as a business need exists.

**QUESTION RELATED TO ITEM 030**

**5. Why does this item retain public comments for such a short period of time?**

Public comments are the heart of the public's ability to participate in the rulemaking process. High-profile rulemakings may include public hearings but most are simply published in an *FR* notice with a deadline by which people must submit written comments. Public comments can be important documentation of a rule's final development and many agencies include them in the docket. But sometimes comments are voluminous: into the hundreds of thousands, and on occasion millions. They may also be duplicative. If public-interest groups encourage people to comment on a proposed rule and offer pre-packaged response text, the agency may receive thousands of identical comments whose only difference is the person who signed—but did not actually write—them. Although agencies consider all the comments and the number they receive expressing the same concerns, some do not necessarily retain any or all of the comments, especially duplicative ones, instead accounting for the comments in other ways (such as keeping one example or summarizing them). This item reflects the reality that some

agencies include in the final docket only a summary of comments and gives them the option to destroy some or all of the original comments as background material.

**QUESTION RELATED TO ITEM 050**

**6. Why do you exclude records received by General Services Administration, 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.