

## Frequently Asked Questions (FAQs) about the GRS Update Project

Revised June 2016

### GENERAL ISSUES

#### 1. How does OMB/NARA M-12-18, Managing Government Records Directive, affect this effort, or how does this effort fit into the Directive?

OMB/NARA M-12-18, Managing Government Records Directive, requires that NARA revise, update, and expand the GRS by December 31, 2017. The GRS Update Project is the effort to meet that mandate by revising the existing schedules and adding new content.

NARA recognizes that the Directive requires agencies to submit schedules for all unscheduled paper and other non-electronic records by December 31, 2016, and that this deadline may, at times, result in agencies scheduling records that ultimately end up covered by a new GRS as well. Unfortunately, NARA cannot condense its GRS update project timeframe to adjust for this because of the scope of the project. NARA apologizes for the inconvenience, but recommends agencies continue to follow their own scheduling timeline to meet their Directive requirements, rather than wait on a future GRS update.

#### 2. How does the new GRS differ from the old GRS?

The new GRS incorporates these changes:

- A new structure: the GRS is completely reorganized along functional lines.
- Streamlined and big-bucket items: we aggregate previously and newly scheduled records whenever retention requirements allow.
- General updating: we revise records descriptions and retention to reflect current business practices and rescind items no longer needed.
- Flexible retention periods: new disposition instructions for temporary records establish retention parameters (usually minimum periods), allowing agencies to set longer retentions based on their own business needs without having to request approval from NARA. This aids agencies looking to include GRS items in their own big buckets—they can extend retention periods without NARA approval. This also provides more clarity as to when a retention period is fixed and cannot be deviated from without significant justification.
- Additional clarity: FAQs and other implementation aides for individual schedules help interpret and implement the GRS.
- New content is included in updated items to reflect current business practices. For instance, library records make their debut in the GRS with Transmittal 26 (GRS 4.4).

#### 3. Does the new GRS include new record content?

The new GRS may include new record series related to the functions mapped to the current GRS. We are also planning to add some completely new functional areas to the GRS, such as Public Affairs Records and Legal Records, but inclusion of these records depends on whether series are ultimately appropriate for a GRS. Because new content takes more time to research and verify, some of the proposed new schedules may not be completed by December 31, 2017.

#### **4. Are any legacy GRS items being retired?**

Disposition items no longer needed are rescinded from the GRS as new schedules replace old ones. For instance, “telegrams filed in support of telegraph bills,” added to the GRS in 1977, make their exit with Transmittal 23. NARA makes the rescissions known by issuing transmittal memos sent out via RM Communication and posted on the GRS website.

#### **5. Why do the new schedules no longer match up with the original GRS Restructuring Plan item list?**

The GRS Team used *The New GRS: A Plan for Restructuring and Updating the General Records Schedules* (September 2012) as a fluid framework to map the older GRS authorities to functional lines of business (LOB) based in part on the Federal Enterprise Architecture (FEA). These functions and sub-functions were not meant to be the actual buckets under which records would be aggregated and scheduled. The functions and sub-functions only identified the general structure for the new GRS and the organizational structure of the published version of the GRS. During the schedule research and writing phases, the GRS Team found the need to make changes to the original restructuring plan.

### **THE GRS UPDATE PROCESS**

#### **6. Does NARA update the entire GRS at one time or in parts? When will the GRS be updated again?**

The GRS has always actually been multiple schedules—1 through 27 in the old GRS. Over the years, they have been updated individually in whole or in part, but not until the Update Project has the whole compendium been updated at once. The new GRS is also comprised of multiple schedules and like its predecessor is being issued in parts. In Fiscal Year 2013, the GRS Team started a five-year process of updating the GRS. As new schedules are released they replace parts of the old GRS. Superseded items are clearly marked in each new GRS Transmittal until the entire old GRS has been replaced. Once the five-year revision project is complete, the GRS Team will continue with periodic updates and revisions of the GRS as needed.

#### **7. How does NARA inform agencies of new GRS updates?**

NARA has multiple ways to keep agencies aware of GRS updates. NARA issues new schedules through GRS Transmittals distributed via RM Communications to agency records management staff. NARA also posts updates on its [GRS web page](#). New schedules are published online; both

as individual schedules in the [Records Control Schedules online repository](#), and as incorporated with other schedules in GRS Transmittals. The GRS Team has given, and will continue to give, regular updates on the project during NARA's Bimonthly Records and Information Discussion Group (BRIDG) meetings, to which representatives from all agencies are invited.

#### **8. Does NARA solicit agency participation in developing new GRSs?**

The GRS Team works closely with agencies to gather information about processes, their related records, and business needs for those records. We solicit agency input in a variety of ways, such as focus groups, and approach some agencies specifically based on their subject matter expertise. We are always looking for new ways to get agency input on new schedules. If you have thoughts about a particular schedule, please contact us at [GRS\\_Team@nara.gov](mailto:GRS_Team@nara.gov).

### **THE NEW SCHEDULES**

#### **9. Why do the new schedules have flexible disposition instructions such as “when no longer needed” or “longer retention is authorized if required for business use”?**

The flexible GRS authorities set parameters for retention periods, rather than specific lengths, so that agencies have some latitude in implementing the GRS for their programs. Agencies may establish fixed retention periods within those parameters without further NARA approval. Agencies may also create big-bucket items for records within the flexible GRS retention parameters without requesting approval by NARA.

#### **10. How can agencies using electronic records management applications (RMAs), which require fixed cut-off statements and retention periods, implement the open-ended disposition authorities in the GRS?**

The agency may continue to use fixed disposition instructions suited to RMAs as long as the instructions fit within the parameters of GRS disposition instructions and the agency cites the GRS authority. If the agency-schedule fixed disposition instructions do not fit within the parameters of the new GRS disposition instructions, the agency may use its existing schedules by notifying the GRS Team within 120 days of the new GRS issuance (if the GRS permits). If the agency finds the new GRS authority covers records not previously scheduled by the agency and its business needs require fixed disposition instructions outside the parameters of the new GRS, the agency may request a deviation from the GRS by submitting a new schedule.

#### **11. Why does the GRS include items for copies of records? Aren't copies “non-record” material?**

Some copies of records are used in the course of agency business to make decisions or take action. These, even though they are copies, are also Federal records and the new GRS schedules them. For example, a program office may initiate and track a case file and send a copy to another program office to support the second office's mandate. The agency then has

two copies of the case file fulfilling different program directives, and both are Federal records. Other copies are kept only for convenience of reference. Those are *non-records* and for that reason are not mentioned in the GRS.

## **PROJECT TIMELINE**

### **12. Why does it take five years to complete this project?**

The revision project isn't a matter of updating a single schedule. While the GRS Team builds upon current schedules, each new schedule must be built fresh from the ground up. We reexamine old authorities to see if they are still relevant, investigate current business practices to identify new records series that need to be added, solicit and incorporate agency input as much as possible, and analyze all this information to create more comprehensive schedules. We are also committed to building new schedules on the bucket model wherever useful. It is not a small task. It's comparable to an agency updating and revising its entire records manual after 20 years, but even more complicated; rather than looking at records in just one agency, we seek to accommodate all agencies.

### **13. How long does it take for the GRS Team to finish and issue each new GRS schedule?**

The GRS Team estimates it takes about 24 months to draft, review, and issue a new GRS schedule. Depending on the complexity of the schedule and review or other variables, the scheduling process for a particular schedule may be shorter or longer than that estimate.