

GRS 2.6 Employee Training Records

This file contains three documents. The Draft Schedule is the proposed text of the new GRS in publication format. The Draft Appraisal Memorandum provides additional background explanation and includes the appraiser's justification for the retention decisions proposed in the schedule. The Crosswalk provides additional help in schedule implementation.

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GENERAL RECORDS SCHEDULE 2.6: Employee Training Records

This schedule covers records related to the design, development and implementation of employee training programs within Federal agencies. This schedule includes agency sponsored training and training received from other agencies or other institutions and private vendors. This schedule does not include specialized training for firearms, health and safety, national defense, senior executives, or political appointees. This schedule aligns with the Office of Personnel Management (OPM) Guide to Personnel Recordkeeping and Guide for Training Material.

Records created or received by OPM for the purpose of overseeing employee training in Federal agencies are not covered by this schedule and should be scheduled as on OPM schedule.

Item	Records Description	Ethics training. Supersedes: GRS 25, item 8a (N1-GRS-01-1 item 8a)	Disposition Instruction	Disposition Authority
010	<p>Employee Training Program Records. Records related to the planning, assessment, administration and evaluation of a program. Records may include logistics and coordination of a training event or conference.</p> <ul style="list-style-type: none"> organizational, occupational, and employee needs assessments agency's evaluation of their training program strategic plans and reports about agency employee training employee training statistics background and working papers availability of training and schedule of courses requests for training forms (SF 182) registration forms, class rosters, verification of training. evaluations of courses, instructors, and/ or delivery method <p>Note: Financial records related to purchase of or travel for training are scheduled under GRS 1.1, 010.</p>		<p>Temporary. Destroy when 6 years old.</p>	DAA-GRS-2015-XXXX-0001
011		<p>All other training. Supersedes: GRS 1, item 29a1, (NC1-64-77-10 item 30b1) GRS 1, item 29a2, (NC1-64-77-10 item 30b2) GRS 1, item 29b, (NC1-64-77-10 item 30c)</p>	<p>Temporary. Destroy when 3 years old or when superseded, but longer retention is authorized if required for business use</p>	DAA-GRS-2015-XXXX-0002
020	<p>Course Materials. Records related to the creation of training material. Records may include:</p> <ul style="list-style-type: none"> reference and working files of current course 	<p>Ethics Courses material. Record copies of instructional material used to provide employee ethics training and education.</p>	<p>Temporary. Destroy when 6 years old, or when superseded or obsolete,</p>	DAA-GRS-2015-XXXX-0003

	<p>content</p> <ul style="list-style-type: none"> • presentations • agency developed training material • instructor's guides or handbooks • syllabi • lesson plans • class handouts • student homework, assignments, exams • course material maybe be in a variety of formats: filmstrips, slides shows, films, videos, multimedia, webinars <p>Exclusion 1: This does not include vendor owned materials provided through online training systems.</p> <p>Exclusion 2: This does not include specialized training for firearms, health and safety, national defense, senior executives, or political appointees.</p>	<p>Supersedes: GRS 25, item 8b (N1-GRS-01-1 item 8b)</p> <p>All Other Courses Material. Record copies of instructional materials used to provide employee training.</p> <p>Supersedes: GRS 21, item 3 (NC1-GRS-81-9, item I-3) GRS 21, item 9 (NC1-GRS-81-9, item III-1) GRS 21, item 14 (NC1-GRS-81-9, item IV-1) GRS 21, item 17 (NC1-GRS-81-9, item IV-4)</p>	<p>whichever is later.</p> <p>Temporary. Destroy 1 year after training event, or when superseded, but longer retention is authorized if required for business use.</p>	<p>DAA-GRS-2015-XXXX-0004</p>
030	<p>Individual Employee Training Records. Records that document the activities an employee has taken related to training and development of job skills.</p> <ul style="list-style-type: none"> • Individual Development Plans (IDP) • mentoring or coaching agreements • certificates of completion for mandatory training • data related to completion of training courses or program • Continuing Service Agreements (CSA) <p>Exclusion 1: This does not include academic transcripts, professional licenses, or civil service exams or documentation related to completion of required mission-related training such as firearms, law enforcement, health and safety inspection, etc.</p> <p>Supersedes: GRS 1, item 29b , (NC1-64-77-10 item 30c) (in part) GRS 25, item 8a (N1-GRS-01-1 item 8a) (in part)</p>	<p>Supersedes: GRS 25, item 8b (N1-GRS-01-1 item 8b)</p>	<p>Temporary. Destroy when 6 years old or when superseded whichever is later, but longer retention is authorized if required for business use</p>	<p>DAA-GRS-2015-XXXX-0005</p>

Date: April XX , 2015
Appraiser: Katherene Kim, ACNR
Agency: General Records Schedules (GRS)
Subject: 2.6 Employee Training Records

DRAFT

INTRODUCTION

Schedule Overview

Employee Training Records

Additional Background Information

This schedule provides disposition authority for employee training records. This schedule includes federally mandated training, and training to improve an individual's performance or professional development. Government employee training is regulated by the Government Employees Training Act (GETA) of 1958 and codified in Chapter 41 of title 5, United States Code (5 U.S.C. 4101- 4119). Federal agencies must report training data to the Office of Personnel Management (OPM). OPM's authority to collect and require agencies to report training data is found in section 4115 of title 5, United States Code and section 410 of title 5, Code of Federal Regulations.

Employee training records were originally scheduled in three different locations in the GRS: GRS 1 Civilian Personnel Records, GRS 21 Audio Visual Records, and GRS 25 Ethics Program Records. In addition, the old GRS made a distinction between agency training and external (other agencies or private) training. The new schedule has been drafted to reflect the functions of developing and administering a training program. This schedule consolidates the training records that were originally separated due to format (Audio Visual Records) or content (Ethics Training Program Records). Two new items have been added: Course development records – specifically excluded from GRS 1, 29a and only partially covered by GRS 21--and records of individual employee training received from the employee's home agency (the previous GRS only covered records related to training programs sponsored by other agencies or outside institutions). This schedule replaces GRS 1 Civilian Personnel Records, items 29a1, 29a2, 29b; GRS 21 Audio Visual Records, items 3, 9, 14, 19; and GRS 25 Ethics Program Records, items 8a, and 8b.

During a 2012 GRS survey, we received comments from agencies requesting the GRS include law enforcement training. Our research into Law Enforcement Officer (LEO) training revealed these records had very specific requirement for firearms training. In addition, specialized law enforcement school or academies are required to be accredited by the Law Enforcement Training Accreditation (FLETA) Board. Accreditation and firearms training records require specific retention periods based on an agency's accreditation process,¹² and the length of the LEO's service.

¹ While FLETA does not set records disposition for accreditation records, they recommend agencies "to retain accreditation records until the academy or program has been reaccredited" FLETA website (retrieved 02/15/2015 <https://www.fleta.gov/faq/how-long-should-we-maintain-our-fleta-accreditation-materials>)

² N1-087-09-003 (DHS schedule for Secret Service accreditation records)

In addition, firearms training requires a substantially longer retention period due to the Law Enforcement Officer Security Act (LEOSA) of 2004, which allows qualified LEOs (including retired LEOs), to carry firearms nationwide³. Examples of the longer retentions can be found in the Federal Law Enforcement Training Center (FLETC) and the Federal Law Enforcement Training Accreditation (FLETA) Program schedules. FLETC, the largest single provider of law enforcement training for the federal government⁴, retains student and class files (N1-056-02-2, item 2a) for 40 years “to ensure records are maintained for an officer’s entire career.” FLETA has disposition instruction for course material (DAA-0478-2012-0002, item 2) to “cut-off upon creation of new training material...Destroy 20 years after cut-off.” The justification for this retention is to “track the training of law enforcement personnel and evaluate the program over time.” Since this training is not sufficiently common throughout the Federal government and requires a relatively long retention, we chose not to include LEO training. However, this does not mean 2.6 cannot be used by law enforcement agencies for routine, mandatory training or any other training not related to their specific profession.

Agencies also requested the GRS cover Learning Management Systems (LMS) or other on-line training programs. Instead of scheduling the system, NARA recommends agencies schedule the data or information in the system. The majority of information contained in a LMS fall under the current GRS. Course content, class tracking, individual development plans, and data reporting are covered by GRS 2.6. Financial information related to paying for courses, purchasing of course material, paying outside vendors, or travel for training, is covered under GRS 1.1.

NARA developed this schedule with assistance from The Library of Congress, Health and Human Services, National Archives and Records Administration, and the National Aeronautics and Space Administration.

Overall Recommendation

I recommend approval of the attached schedule.

APPRAISAL

Item 0001 (GRS 2.6, item 010): : Employee Training Program Records: Ethics training

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- * Has little or no research value. These records are administrative in nature.
- * Previously scheduled as temporary. GRS 25, item 8a (N1-GRS-01-1 item 8a)

³ Public Law 108-277, 108th Congress (retrieved 12/05/2014 from <http://www.gpo.gov/fdsys/pkg/PLAW-108publ277/pdf/PLAW-108publ277.pdf>), Bureau of Alcohol, Tobacco, Firearms and Explosive, press release 07/27/2004 (retrieved 12/05/2014 from <https://www.atf.gov/press/releases/2004/07/072404-atf-law-enforcement-safety-act.html>)

⁴ GAO-06-815 (retrieved 11/13/2014 <http://www.gao.gov/products/GAO-07-815>)

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. There has been no change in the retention of these records. Records must be maintained a minimum of six years per the Office of Government Ethics (OGE).

Media Neutrality: Approved

Item 0002 (GRS 2.6, item 011): Employee Training Program Records: All other training.

The old GRS only covered general files of agency-sponsored training. The new GRS has expanded this item to include employee training program records more generally and has combined it with working papers and background materials.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

* Has little or no research value. These records are administrative in nature.

* Previously scheduled as temporary. GRS 29a1 (NC1-64-77-10 item 30b1), GRS 29a2 (NC1-64-77-10 item 30b2), GRS 1, item 29b, (NC1-64-77-10 item 30c)

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. There is no substantial change to the retention of these records. The previous retentions for these records were 5, 3, and 5 years respectively. The shortest retention of the three items was deemed appropriate for these records, as agencies are authorized to keep records longer if they have a business need to do so.

Media Neutrality: Approved

Item 0003 (GRS 2.6, item 020): : Course Material: Ethics course material.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

* Has little or no research value. These records are administrative in nature.

* Previously scheduled as temporary. GRS 25, item 8b (N1-GRS-01-1 item 8b)

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. There is no change to the retention of the records.

Media Neutrality: Approved

Item 0004 (GRS 2.6, item 021): Course Material: All other course material.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

* Has little or no research value. These records are administrative in nature.

* Previously scheduled as temporary. GRS 21, item 3 (NC1-GRS-81-9, item I-3), GRS 21, item 9 (NC1-GRS-81-9, item III-1), GRS 21, item 14 (NC1-GRS-81-9, item IV-1), GRS 21, item 17 (NC1-GRS-81-9, item IV-4)

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. No substantial change in retention. All superseded authorities' state "destroy 1

year after completion of training program." Agencies are authorized to keep records longer if they have a business need to do so.

Media Neutrality: Approved

Item 0005 (GRS 2.6, item 030): Individual Employee Training Records.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

* Has little or no research value. These records are administrative in nature.

* Similar records have been consistently scheduled as temporary⁵

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. The six-year retention matches the minimum number of years employees need to keep certificates of completion, or verification they had received and completed ethics training Agencies are authorized to keep records longer if they have a business need to do so.

Media Neutrality: Approved

⁵ N1-060-10-032, item 1 (DOJ); N1-065-09-010, item 2 (FBI); -545-08-023, item 3, item 6 (GIPSA); N1-425-04-001, item 5 (Treasury)

New GRS 2.6				Old GRS			
GRS No.	Item No.	Retention	ERA Number/ Disposition Authority	GRS No.	Item No.	Retention	Disposition Authority
2.6	010	6 years	DAA-GRS-XXXX-0001	25	8a	6 years	N1-GRS-01-1 item 8a
2.6	011	3 years, or when superseded	DAA-GRS-XXXX-0002	1	29a1	5 years old, or 5 years after completion of program	NC1-64-77-10 item 30b1
				1	29a2	3 years	NC1-64-77-10 item 30b2
				1	29b	5 years old, or when superseded	NC1-64-77-10 item 30c
2.6	020	6 years, or when superseded or obsolete	DAA-GRS-XXXX-0003	25	8b	6 years old, or when superseded or obsolete	N1-GRS-01-1 item 8b)
2.6	021	1 year, or when superseded	DAA-GRS-XXXX-0004	21	3	1 year	NC1-GRS-81-9, item I-3
				21	9	1 year	NC1-GRS-81-9, item III-1
				21	14	1 year	NC1-GRS-81-9, item IV-1
				21	17	1 year	NC1-GRS-81-9, item IV-4
2.6	030	6 years, or when superseded	DAA-GRS-XXXX-0005	New Item			