GRS 4.5, Digitizing Records

This file contains three documents. The Draft Schedule contains 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. Also included are drafts of new questions to be added to the current FAQ.

THE SCHEDULE IS NOT APPROVED FOR USE.

National Archives and Records Administration
Office of the Chief Records Officer
GRS Team
April 28, 2025

DRAFT

GENERAL RECORDS SCHEDULE 4.5: Digitizing Records

This schedule covers source records that have been digitized and documentation related to digitization projects and processes.

Exclusions

1. Final digitized versions of records. These records must be scheduled on an agency-specific schedule or an applicable General Records Schedule.
2. Input/source records for non-digitized records. GRS 5.2, item 020, covers these records.

Item	Records Description		Disposition Instruction	Disposition Authority
010	**Source Records** Records from which a digitized version or copy is created. **Exclusions** This authority does not cover the following records. For additional information on how to proceed for excluded records see the Frequently Asked Questions (FAQs) for GRS 4.5, Digitizing Records. 1. Media types not covered by 36 CFR 1236 Subpart E - Digitizing Permanent Federal Records. Agencies must use agency-specific schedules for these records or wait for the	**Of <u>Compliant</u> Digitized Records** Source records from which a digitized version or digitized copy is created that fully meets the standards in 36 CFR 1236 Subpart D - Digitizing Temporary Federal Records, or Subpart E - Digitizing Permanent Federal Records; and that are: ● Scheduled as temporary in an approved records schedule; or ● Scheduled as permanent and that were created on or after 1 January 1950; and ● Do not have intrinsic value. *Supersedes:*	**Temporary.** Destroy after validating the digitization process meets NARA's digitization standards in regulation (36 CFR 1236 Subpart D and Subpart E). Longer retention is authorized for business use.	DAA-GRS-XXXX-XXXX-0001

	regulations to be updated to include additional media types. 2. Source records that were created before 1 January 1950 that have been scheduled as permanent or are unscheduled. Agencies must submit an agency-specific schedule for these records. 3. Source records that have intrinsic value in the original medium that would be lost if the content were converted to another medium. Consult your NARA appraiser if you have source records that may have intrinsic value. **Notes** 1. The regulations for digitizing records and this disposition authority do not address other business needs or legal constraints that may make it necessary for an agency to retain source records for a period of time after digitization. Consult with legal counsel before disposal to ensure there are no concerns associated with rights and interests, appeal rights, benefits, national security, litigation holds, or other similar issues. 2. Agencies must schedule digitized records before disposing of any source records if they are unscheduled.	*DAA-GRS-2022-0010-0001 (GRS 2.2, item 010) – title change, reformatting to accommodation addition of item 011*		
011		**Of <u>Noncompliant</u> Digitized Records related to <u>permanent</u> records that were digitized before the issuance of the relevant media type regulations** Records from which a digitized version or copy is created, and: ● The source records were used to digitize records that have an approved permanent final disposition; and ● The digitization occurred before the end of the calendar year in which the relevant media type regulations were issued (for example, prior to December 31, 2023 for regulations issued in May of 2023), and ● The records do <u>not</u> meet the standards of those regulations; and ● The agency captured all information contained in and included all the pages or parts from the source records; and ● The agency ensured that they can locate, retrieve, access, and use the digitized copies for the records' entire retention period; and	**Temporary.** Destroy when the digitized records are transferred to the National Archives and NARA confirms legal custody has been accepted. Longer retention is authorized if required for business use.	DAA-GRS-XXXX-XXXX-0002

	Media limitation: This applies to paper/analog records only. **Legal citations:** 44 U.S.C. 3302 and 3312, 36 CFR 1236.36(a), 36 CFR 1236.56 (d), (f) and (g)	● The agency validated that the digitized records are of suitable quality to replace the source records; and ● The digitized copies of the source records have been fully accepted by the appropriate NARA custodial unit during legal transfer. **Exclusions** 1. Source records related to temporary records. These are covered by item 010. **Notes** 1. Please consult the FAQ for further instructions if your agency has non-compliant digitized records created after the issuance of the relevant regulations.		
020 - 021	**No change**			

Date: March 24, 2025
Appraiser: ACRS
Agency: General Records Schedules (GRS) **DRAFT**
Subject: DAA-GRS-2025-000X

INTRODUCTION

Schedule Subject
GRS 4:5 Digitizing Records

Additional Background Information
The Office of the Chief Records Office (CRO) for the United States Government stood-up a "digitization working group" to discuss NARA guidance related to digitization standards, specifically 36 CFR 1236 Subpart D - Digitizing Temporary Federal Records, and Subpart E - Digitizing Permanent Federal Records.

The group is composed of AC managers and supervisors (including appraisal and oversight), the GRS Team Lead, members of NARA's General Counsel's office (NGC), and staff from the electronic records custodial unit (RRE). Their goal was to develop guidance about how to schedule source records that were not digitized to NARA standards.

The group determined that source records may be destroyed if an agency digitized records before the relevant standards were issued, the digitized records do not meet NARA standards but are still complete and fully acceptable from an access and transfer standpoint, and the source records are still in agency custody. The need for this item was further supported by the submission of a few agency-specific schedules reflecting the same scenario.

To follow up on this decision, The GRS Team (ACRS) developed proposed item 011, to apply to source records that fall under this scenario. As evident in the GRS item itself, as well as the revised FAQ for GRS 4.5, there are strict criteria for when this item may be used by agencies. The GRS will not apply to other scenarios, such as instances where an agency did not digitize to the proper standards after those standards were issued. This new item acknowledges that requiring agencies to re-digitize the records is not in the best interest of agencies, NARA, or the taxpayer, but still supports the preservation of permanently valuable records.

Overall Recommendation
Approval of the attached schedule is recommended based on NARA Directive 1441 Appraisal Policy of the National Archives and Records Administration.

APPRAISAL

Item 0001 (GRS 4.5, 010): Source Records: Of Compliant Digitized Records

The purpose of this item is unchanged. It still only applies to source records in instances where the digitization standards have been fully met, regardless of when the digitization occurred, and regardless of whether the records are permanent or temporary.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Superseded items:

- DAA-GRS-2022-0010-0001 (GRS 4.5, 010), Source Records - Temporary

Reason for rescheduling: To revise the title and to reformat the item to accommodate the addition of new item 011. Information that pertains to both items 010 and 011 is now consolidated, and information specific to only item 010 was moved to a new column. No changes to the final disposition are proposed.

Appraisal Justification

- Information is captured in other permanent records. The official recordkeeping version of the records is the digitized records, which will follow the disposition instructions of the relevant schedule (permanent or temporary). As a replacement for the source records, the source records do not have value beyond the time of digitization and agency validation.
- Records have been previously appraised as temporary.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. The disposition instructions have not changed from the previously approved schedule.

Media Neutrality: Approved

Item 0002 (GRS 4.5, 011): Source Records: Of Noncompliant Digitized Records related to permanent records that were digitized before the issuance of the relevant media type regulations

As outlined in the background section above, this item applies to source records that have been digitized before the digitization standards were issued. This item only applies in instances where the digitized records are permanent, are validated by the agency to be complete and accessible, and are fully accepted by the relevant NARA custodial unit. This item only covers source records originally scheduled as permanent because the standards for digitizing temporary records are easier to meet, and are generally covered by item 010.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Superseded items: None

Reason for rescheduling: Not Applicable

Appraisal Justification

- Information is captured in other permanent records. The official recordkeeping version of the records is the digitized records. As long as NARA accepts the records as complete and accessible, the digitized versions may serve as a replacement for the source records. Therefore, the source records do not have value beyond the time of digitization and validation, once the digitized records have been accepted by NARA as complete and accessible. This only applies in cases where records were digitized prior to NARA issuing standards, however.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. To mitigate risk to both agencies and NARA, the final disposition may only be used after the digital records have been fully accepted by the relevant NARA custodial unit. This ensures that the digital versions are complete and accessible before the source records are eligible to be destroyed.
Media Neutrality: Approved

DRAFT

Frequently Asked Questions about GRS 4.5, Digitizing Records

Updated: Date

1. What is the purpose of GRS 4.5?

This schedule:

- Provides disposition authority for source records that were digitized in accordance with NARA regulations (item 010).
- Provides disposition authority for source records related to permanent records that were not digitized in accordance with NARA regulations and were digitized prior to the issuance of the relevant regulations (item 011).
- Outlines exclusions where the GRS cannot be applied to source records.
- Supports the requirement for federal agencies to manage all permanent records electronically to the fullest extent possible.

2. What are the exclusions to GRS 4.5?

This GRS does not cover the following records.

- Media types not covered by 36 CFR 1236 Subpart E - Digitizing Permanent Federal Records. Agencies must use agency-specific schedules for these records or wait for the regulations to be updated to include additional media types.
- Source records that were created before 1 January 1950 that have been scheduled as permanent or are unscheduled. Agencies must submit an agency-specific schedule for these records.
- Source records that have intrinsic value in the original medium that would be lost if the content were converted to another medium. See questions 12 and 13 for more information about intrinsic value.
- Source records whose digitized versions do not meet NARA's digitization standards that were digitized after the issuance of the relevant digitization standards.

- Final digitized versions of records (which have become the recordkeeping copy of the records).
- Input/source records for non-digitized records.

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

Your agency must first schedule the records to have disposition authority for the digitized version. Once you know the disposition of the digitized records, you can determine if the source records are disposable under GRS 4.5, item 010 or item 011.

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

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

The agency records schedule approved for the source records applies to the digitized records as long as the conditions of the applicable GRS item (item 010 or item 011) are met.

5. GRS 4.5 authorizes the destruction of source records after either validation (item 010) or acceptance by the NARA custodial unit (item 011). Can my agency keep the source records longer?

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

6. How do GRS 5.2, item 020 for intermediary records, and GRS 4.5, items 010 and 011 for source records relate to each other?

GRS 4.5, items 010 and 011, cover source records. Source records are the records from which a digitized version or digitized record is created. The source record should be the record copy that was used in the course of agency business.

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

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

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

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

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

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

GRS 4.5 cannot be applied to source records in media types not covered by 36 CFR 1236 - Subpart E. NARA is developing additional digitizing standards for other formats and will be updating Subpart E over time. Once those updates are made, the GRS will apply.

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

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

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

You should digitize the photographic prints to NARA standards in 36 CFR 1236 - Subpart E and destroy the source records using GRS 4.5, item 010. You should wait until NARA has issued digitization standards for film records; but as long as NARA accepts the records, you can destroy these source records now under item 011.

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

GRS 4.5 cannot be applied to permanent source records that were created or received before January 1, 1950. Agencies must submit a records schedule for the pre-1950 source records. However, GRS 4.5 can be applied to temporary source records created or received before January 1, 1950. For unscheduled records, see question 3.

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

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

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

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

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

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

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

Otherwise, consult your NARA Appraisal Archivist to determine if a new schedule is required.

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

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

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

14. Where can I find more information?

More information about the digitization of records is available on NARA's Digitization of Federal Records website.

Questions about item 010

15. How does GRS, item 010, work with NARA's digitization standards?

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

The standards for permanent records are available in 36 CFR 1236 - Subpart E.

The standards for temporary records are available in 36 CFR 1236 - Subpart D.

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

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

If the digitized records cannot be validated as complying with the 1236 Subpart D or E requirements, then your agency cannot use GRS 4.5, item 010, to dispose of the source records.

If the digitization occurred prior to the issuance of the standards, agencies may be eligible to use item 011. See the section about item 011 below for additional information.

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

No. GRS 4.5, item 010, applies to the source records used to create digitized records that meet the digitization standards. Item 010 does not apply to digitized versions of the records that don't meet the standards.

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

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

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

Question about item 011

18. How does GRS, item 011, work with NARA's digitization standards?

Since there was no regulatory standard to follow until June 5, 2023, records digitized before these dates could not comply with 36 CFR 1236 Subpart E. However, the source records used to create these digitized versions still require disposition authority, which item 011 provides if certain criteria are met.

This is not the case for source records that were not digitized to the standards after their issuance of the relevant standards (such as May of 2023 for analog records). Please consult the FAQ on previously digitized records for additional information on what to do in this scenario.

19. For item 011, what is meant by the requirement that "[t]he agency validates that the digitized records are of suitable quality to replace the source records"?

Before applying item 011, an agency must first determine that the digitized versions are complete, accessible, and are of sufficient quality to serve all of the same business purposes as the source records. As the item description notes, they must:

- Be complete: The agency captures all information contained in and includes all the pages or parts from the source records. There are no gaps, loss of information (such as within marginalia), missing pages, loss of color or scaling that affects context, incomplete images, etc.
- Be accessible: The agency ensures that they can locate, retrieve, access, and use the digitized copies for the records' entire retention period. The digitized files can be opened, read, and used for business purposes.
- Be usable: The digitized copies can serve all of the same business purposes as the source records; the digitized versions must be fully usable in the same manner that the source records were.

In other words, even though the digitized versions do not meet the standards, they are still adequate to act as replacements to the source records.

This validation is an agency responsibility; no reporting to NARA is required. If an agency determines that the records are not complete and accessible, then item 011 may not be applied. Please consult the FAQ on previously digitized records for additional information on what to do in this scenario.

20. Does my agency have other options if we do not want to maintain the source records as required by item 011?

Agencies eligible to use item 011 are highly encouraged to do so. Agencies do, however, have the following options if they feel that item 011 is not implementable:

- The agency can re-digitize the source records to meet the standards, in which case item 010 would apply to the source records.
- The agency can seek an exception request to transfer the analog versions (the source records) to the National Archives instead of the non-compliant digital versions. Approval of these requests will require agencies to document the burden of either re–digitizing the records or maintaining the source records. Approval is not guaranteed.
- The agency can request an early transfer of the digitized records by contacting the appropriate NARA custodial unit. This is only advisable if the records are close to being eligible for legal transfer. Approval is not guaranteed.
- The agency may submit an agency-specific disposition schedule for the source records as a deviation to item 011. Acceptance of these schedules will require agencies to document the

burden of either re-digitizing the records or maintaining the source records, and may require that the agency provide documentation related to the digitization project / process. Approval is not guaranteed.

Agencies with questions on any of these options should contact their NARA Appraisal Archivist for additional information.