

Checklist for Implementing the GRS

The purpose of this optional checklist is to assist agencies to implement a new General Records Schedule (GRS) when one is issued. Agencies may use this tool, in full or in part, as they need when updating agency materials on records disposition. Such materials may include comprehensive schedules, bucket schedules, or disposition manuals. Questions about GRS implementation may be addressed to the GRS Team at GRS_Team@nara.gov.

When NARA issues a new GRS transmittal, an agency should:

- 1. Identify old GRS items in its comprehensive disposition manual that are superseded by any new GRS items. Use the new to old crosswalks for each new schedule, included in the GRS Transmittal, to aid in this process.
- 2. Identify agency-specific authorities that are covered by new GRS items.
- 3. Determine whether it is necessary to revise the agency's comprehensive disposition manual to conform to new GRS item(s).
 - If the GRS item states that it is mandatory and must be followed without exception, the agency must follow the GRS and cannot use an agency authority, even if previously approved by NARA. The agency must update its agency comprehensive disposition manual with the new GRS disposition authority.
 - If agency-specific schedule disposition instructions fall within the parameters of the new GRS disposition instructions, update the agency-specific schedule with the new GRS disposition authority.
 - The agency may define cutoff instructions and set retention periods different from the GRS ones and still cite the new GRS disposition authority—as long as the agency instructions and retention periods fall within the parameters of the new GRS flexible disposition instructions. For instance, if the GRS retention instruction is “destroy 3 years after program closure, but longer retention is authorized if required for business use,” the agency may choose to specify destruction 6 years after program closure and still cite the GRS item as the authority, if the agency has a business need for longer retention.
 - If the agency-specific schedule disposition instructions do not fall within the parameters of the GRS disposition instruction, the agency has two options:
 - If the new GRS disposition instruction is appropriate for the records, revise the agency-specific disposition instructions in accordance with the new GRS authority.
 - If the new GRS disposition instruction does not meet agency needs, the agency may use its current disposition rather than the GRS one, but must inform NARA within 120 days of its intention to do so. Send notification to GRS_Team@nara.gov with the subject heading “<Agency name> GRS Notification.” In the body of the email, include:

- agency name;
 - name of requester and/or point of contact (POC);
 - requester/POC email address and telephone number;
 - NARA SF-115 or DAA number and item number;
 - agency manual number and item number; and
 - title of the record series or system of records or bucket schedule item
- If the agency has unscheduled records covered by the new GRS item, the agency may choose between the following two options for the unscheduled records:
 - If the agency determines that the new GRS disposition instructions meet its business needs for the records, the agency should add the GRS item to its agency comprehensive disposition manual.
 - If the agency determines that it needs disposition instructions outside the parameters of the new GRS instructions, the agency must submit to NARA a schedule requesting a deviation from the GRS. Note that unless explicitly prohibited, an agency may request to deviate from the new GRS for permanent as well as temporary records.
4. Make changes to the agency's comprehensive disposition manual as needed. Keep track of changes to inform the Federal Records Center Program (FRCP) or storage service providers and agency staff.
5. Issue comprehensive records disposition manuals updated to conform to new GRS items through the agency's policy process.
- Consider vetting the proposed changes with concerned stakeholders such as affected program offices, General Counsel, Inspector General, and others designated as part of the agency policy approval process.
 - Submit new schedules or change transmittals through the agency directive approval process.
 - Prepare schedules and/or manual for normal agency distribution (e.g., through publication on the agency intranet or Internet).
6. Communicate changes in the agency schedule and/or records management manual to agency staff.
- Consider rolling out training with the issuance of new agency-specific schedules.
7. Identify changes in agency schedules resulting from new GRS items that affect agency records stored in FRCs or other agency records storage facilities, as appropriate.
8. Inform the FRC account manager and/or other storage service provider of changes to agency comprehensive records disposition manuals, as applicable.
- NARA provides the FRC program with crosswalks from old to new GRS items. Transfers using existing GRS citations are updated in ARCIS by the FRCP. The

agency needs to inform the FRCP of alterations to agency-specific schedule authorities and/or comprehensive records disposition manuals affecting records stored in an FRC in order to accomplish any other required ARCIS updates.

- Contact information for agency FRCP account managers can be found at <http://www.archives.gov/frc/acct-reps.html>.
- NARA does not provide GRS crosswalks to commercial records storage facilities. If an agency stores records at such a facility, it must inform the service provider of any changes in records retention or disposition.