

Frequently Asked Questions (FAQs) about GRS 2.3, Employee Relations Records

July 2017

INTRODUCTION

1. What is the purpose of GRS 2.3?

The purpose of this schedule is to provide disposition authority for records that document managing relationships between the agency, its employees, and its unions and bargaining units. The records are those maintained by agency offices that deal with employee relations functions, regardless of office placement in organizational structure.

2. Whom do I contact for further information about this schedule?

You may contact NARA's General Records Schedules Team at GRS_Team@nara.gov with questions about this schedule.

CHANGES FROM THE OLD GRS

3. How does GRS 2.3 differ from the old General Records Schedules (GRS)?

GRS 2.3 consolidates into fewer items several series of human resource records located in the very granular old GRS 1. It also updates several of those items to reflect how Government human resource offices currently handle those processes. For example, both Alternative Dispute Resolution (ADR) and Equal Employment Opportunity (EEO) records now contain items for the informal and formal aspects of those processes.

There are some new categories, and some refreshed categories. Anti-harassment records are new to the GRS. Some categories of records have a new "program records" item. These items are designed to capture the everyday administrative records of running, maintaining, and implementing these programs. The Displaced Employee Program records are not new but are now a distinct category.

Although they are related to GRS 2.3, this schedule does not cover Merit Systems Protection Board (MSPB) records. We are considering series related to that process for future updates to the GRS. Other records related to employee relations processes, such as written counseling documents, leave warnings/restrictions, and direct orders, are not covered by GRS 2.3. However, we are considering them for future updates to the GRS.

4. Why are some old GRS 1 items rescinded?

GRS 1, items 25b and 25e, have been rescinded. GRS 1, item 25b, Copies of Complaint Case Files, should be treated as non-record reference copies or, if applicable, as attorney or other working files. GRS 1, item 25e, Employee Housing Requests, does not fit with the revised EEO items and appears to no longer be in use.

QUESTIONS RELATED TO ITEMS 011 AND 012

5. Why do these items make a distinction between informal and formal Alternative Dispute Resolution (ADR) processes?

The ADR records were updated to separate formal and informal records to reflect current common ADR workflows.

6. Is ADR used in other employee relations actions?

Yes, ADR is often used in other actions, such as EEO complaints.

QUESTION RELATED TO ITEMS 031 AND 032

7. Why do these items make a distinction between informal and formal EEO complaints?

The older GRS descriptions were created before the EEOC and Federal EEO offices developed informal and formal EEO discrimination complaint processes. These are now common, shared practices across the Federal Government and we revised the GRS to reflect that. Informal complaints are addressed first by counseling or ADR options. Informal complaints may be resolved and never reach the formal stage. If unresolved after counseling or ADR options, complaints may proceed into the formal process. Formal complaints can be decided within the Federal agency or by hearing at the EEOC, or can be appealed to the EEOC or to Federal courts.

QUESTION RELATED TO ITEMS 040 AND 041

8. Why did you create a category for anti-harassment records?

Items 040 and 041, anti-harassment records, are a new series created in response to programs being rolled out across the Federal Government focusing on reducing or eliminating various types of harassment in the Federal workplace when they do not fall into the areas covered by the EEO process or when the employee does not file an EEO complaint. Similarly to ADR records, if these records flow into another process, such as a grievance or an EEO complaint, then they become part of that other case file and are covered by the relevant GRS (or agency-specific) records schedule.

QUESTION RELATED TO ITEMS 050, 051, AND 052

9. Why are other types of labor relations records not included in this schedule?

This series does not include negotiated grievances, arbitration appeals, negotiability appeals, unfair labor practice filings, and impasse filings. We are still determining if these records are appropriate for future updates to the GRS.

QUESTIONS RELATED TO ITEMS 060, 061, AND 062

10. How should agencies interpret the disposition instruction found in items 060, 061, and 062: "Destroy no sooner than 4 years but no later than 7 years after case is closed"?

The Office of Personnel Management (OPM) designated in old GRS 1, items 30a and 30b, that agencies 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. OPM decided to retain the 4-to-7-year disposition instructions in the new items. So, for example, Agency A's records officer, after consulting with agency stakeholders, determines that 5 years is appropriate for 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 do not allow for longer (or shorter) retention periods based on business need.

11. Why are other types of grievances not covered by this schedule?

Negotiated grievances are not included in this schedule. We are conducting more research on negotiated grievances and other categories of conduct and disciplinary files to determine if they are appropriate to be added to the GRS.

QUESTION RELATED TO ITEMS 070 AND 071

12. Why do you exclude the Department of Defense (DoD) from using items 070 and 071?

DoD has established a DoD-specific Priority Placement Program for reassigning displaced career, career-conditional, and excepted service employees. DoD schedules those records on an agency-specific schedule.

QUESTION RELATED TO ITEMS 080 AND 081

13. How are agencies to interpret the note in item 081, "Forms, requests, or applications to participate in telework/alternate worksite programs"?

OPM subject matter experts wanted the disposition instructions to be clearer about the definition of "end of employee participation in the program" as that directly impacts the timing of disposition. The note explains that the end of employee participation includes "if employee leaves telework entirely, is rejected, denied, or barred from telework, has significant changes in telework or agency position such that a new agreement is signed, or employee leaves Federal employment."

Agencies are free to select their cut-off point from within these options. For example, one agency decides that leaving Federal employment as the cut-off works best with their business needs and processes. Another agency may find that a reasonable cut-off point for their needs is when employees experience significant enough change to warrant signing a new telework agreement. Whatever the agency decides is appropriate, it needs to note that decision in records management directives, policies, and appropriate manuals.