

Frequently Asked Questions (FAQs) about GRS 4.3, Input Records, Output Records and Electronic Copies

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INTRODUCTION

1. What is the purpose of GRS 4.3?

This schedule provides disposition authority for records related to electronic systems or collections of electronic records, including:

- Records agencies use to create or update the master or recordkeeping copy
- Certain records extracted from electronic systems, including queries on system content
- Electronic and hardcopy reports
- Non-recordkeeping copies of electronic records

In other words, it covers records that contain information duplicated in the recordkeeping copies of electronic records. This schedule does not cover the recordkeeping copies themselves, which agencies must schedule based on their content.

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

Please 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 4.3 differ from the old General Records Schedules?

GRS 4.3 replaces most of GRS 20. We rescheduled a few items from GRS 20 in a new GRS 3.1, General Technology Management Records, or will include them in other future schedules. We also rescinded some items in GRS 20. For information on the final outcome of specific items in GRS 20, see the GRS 20 crosswalk.

The schedule continues to cover input/source records, output records, and copies of word processing files, electronic mail, and spreadsheets. We reorganized and redefined items within the schedule, but made no significant changes to the records retention periods. Changes include:

- Breaking GRS 20, item 2a4, hardcopy or analog input/source records, into three items, depending on whether and how the agency scheduled the original records.
- Aggregating multiple GRS 20 items covering electronic input records into a single item;
- Merging items for hardcopy and electronic *ad hoc* reports into a single, media-neutral item;
- Aggregating multiple GRS 20 items covering electronic output items into a single item; and
- Aggregating items for copies of word processing files, electronic mail, and spreadsheets and expanding the new item to other copies of electronic files.

4. Why did you rescind GRS 20, items 2a1-3?

We rescinded these three items because they are not actual disposition authorities; GRS items must provide records disposition authorities. Generally, agencies can destroy hardcopy input materials after either verifying the agency has converted them to electronic form (for temporary records) or notifying NARA of XXXX (for permanent records) (see item 2a4). These three items were instructions that allowed exceptions to this general rule. Because items in the GRS provide records disposition authority, we no longer list these exceptions as items in the GRS, but they still exist within the GRS in a different form. They now appear as exclusions to item 011. The intent of GRS 20, item 2a3, is covered by GRS 4.3, items 010-012, which apply to records converted to electronic format in their entirety.

5. Why did you rescind GRS 20, items 3 and 3.1?

We rescinded these items from the GRS because they are not disposition authorities and GRS items provide records disposition authorities. These two items were instructions to either apply an existing schedule or submit a new SF-115. However, removing them from the GRS does not mean that the instructions no longer apply to agencies. NARA's regulations at 36 CFR 1225.24 include instructions on when agencies can apply existing schedules and when they must reschedule records, and agencies must follow these regulations.

6. Can I still apply existing schedules for paper records to electronic versions?

Yes. Title 36 CFR 1225.24 and NARA's [Frequently Asked Questions \(FAQs\) About Media-Neutral Schedule Items](#) provide instructions on when agencies may apply existing schedules for hardcopy or analog records to electronic versions.

DEFINITION OF TERMS USED IN THIS SCHEDULE

7. What are master files?

Master files are the actual content of the electronic records series or system or, in other words, the recordkeeping copy of an electronic record or system. Master files may consist of data, scanned text, PDFs, digital images, or some other form of electronic information. They may include the information content of an entire system or that of a group of related files. Related records within a single master file are not always the same format.

8. What are input/source records?

Input records are the source of the information someone enters into an electronic system. You use them to create, update, or modify master files your agency keeps to meet recordkeeping requirements under a NARA-approved records schedule. Input records may be electronic files or hardcopy (non-electronic) documents. They may include records such as upload files staged for ingest into a system or hardcopy forms scanned or otherwise entered into the system.

Not all input processes create separate records. Those that do *not* include:

- Structured data the user enters from online forms, structured data the user manually inputs directly into the system (no hardcopy form), and unstructured (textual) data that is born digital (*i.e.*, not scanned from paper).

- Data moved automatically from another system with no associated data file. Thus, the data is copied from one system to the other without creating an intermediary data file. (For example, data are pulled from one system to populate another, and fields from System X are used to populate System Y.) This does not cover data migrated from a legacy system to a new system.

9. What does “verification of successful conversion” mean?

Verification of successful conversion means that the agency has taken steps to ensure that hardcopy or analog records have been converted to electronic format in their entirety, that no information or pages are missing, all information is readable, especially in cases where records are scanned, and that the electronic version of the record is accessible (it can be opened). It is up to Federal agencies to define their verification procedures. NARA does not have specific requirements for how conversion of records to an electronic format should be verified.

10. What are output records?

Output records are derived *directly* from the system master file. An example is a report that agency staff print from the system by clicking on a field or radio button in the system. By contrast, reports created using system information but not created directly from the system itself are not system output records. An example is an annual report that agency staff prepares based on reviewing information in the system.

11. What are “non-recordkeeping copies”?

Non-recordkeeping copies are any copy other than the “official record” kept by the agency for formal recordkeeping purposes. Do not confuse the term with “non-record.” Non-recordkeeping copies may be records. They are records if they are used to make decisions or take actions, but they generally do not need to be kept for documentation purposes as long as the official record copy. For example, email an agency creates and receives in the course of Federal business is a non-recordkeeping copy that is a record. Those emails may be copied into an official recordkeeping system for long-term preservation. The copy on your computer is still a record used to conduct business, but it is not the recordkeeping copy; it is a non-recordkeeping copy.

12. Item 040 states that it includes “copies of the above electronic records maintained in websites or web servers, but excluding web pages themselves.” What are “web pages” in this context?

The term “web pages” as it is used in this item refers to the electronic file(s) that make up the page as it renders on the web, such as an HTML or XML file, style sheets, and any other associated files that may make up the web page.

SCHEDULE IMPLEMENTATION

13. Why doesn’t GRS 4.3 cover electronic records/system master files?

GRS 4.3 does not cover electronic records/system master files because the content of such records is too variable. The GRS schedules records based on their content, not the type of records. Input and output records may seem like they are being scheduled by record type, but really they are scheduled based on their content: their content is duplicative information contained in other records. GRS 4.3

schedules records containing information duplicated in other electronic records or recordkeeping systems. Some electronic records/system master files may be covered by other General Records Schedules depending on their content.

14. How and when is GRS 4.3 applied to input records?

If the input records are in hardcopy format:

Input record description	Source already scheduled?	Limitations imposed by the GRS	Instruction	GRS citation
Hardcopy records entered or scanned into the system where the electronic version captures <i>all</i> information on the hardcopy, such as: <ul style="list-style-type: none"> • Data entered into system from a paper form • Scanned images/ PDFs of hardcopy records 	Yes; scheduled as permanent	Schedule states that records must be transferred in hardcopy.	These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.	N/A
		Electronic version does not meet NARA transfer standards.	These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.	N/A
		Schedule does not require hardcopy transfer or is silent on format of records to be transferred to NARA and electronic format meets transfer standards.	Destroy 60 days after submitting notification to NARA per 36 CFR 1225.24(a)(1) <u>and</u> verification of successful conversion, but longer retention is authorized if required for business use.	GRS 4.3, item 1a2 (DAA-GRS-2013-0001-0002)
	Yes; scheduled as temporary		Destroy immediately after verification of successful conversion, but longer retention is authorized if required for business use.	GRS 4.3, item 1a1 (DAA-GRS-2013-0001-0001)
	No		Destroy immediately after approval of a schedule for the electronic records <u>and</u> after verification of successful conversion, but longer retention is authorized if required for business use.	GRS 4.3, item 1a3 (DAA-GRS-2013-0001-0003)

Input record description	Source already scheduled?	Limitations imposed by the GRS	Instruction	GRS citation
Hardcopy records converted to electronic format but containing information not captured in electronic version, such as: <ul style="list-style-type: none"> • Records with handwritten annotations • Records with layered attached notes • Color-dependent documents captured electronically only in black-and-white 	Yes		These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.	N/A
	No		These records are not covered by the GRS. Input record must be scheduled because it is unique.	N/A
Hardcopy records where the electronic version does not replace the source record, such as: <ul style="list-style-type: none"> • A case tracking system in which users input information from source documents, but the documents themselves remain a distinct entity outside the system 	Yes		These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.	N/A
	No		These records are not covered by the GRS. Input record must be scheduled because it is unique.	N/A

If the input records are in electronic format:

Description of input records	Limitations imposed by the GRS	Instruction	GRS citation
Electronic records used to create or update a master file, such as: <ul style="list-style-type: none"> • Work files 		Destroy immediately after data have been entered or otherwise incorporated into the master file or database and verified,	GRS 4.3, item 1b (DAA-GRS-

Description of input records	Limitations imposed by the GRS	Instruction	GRS citation
<ul style="list-style-type: none"> Valid transaction files Intermediate input/output records 		but longer retention is authorized if required for business use.	2013-0001-0004)
<p>Electronic records entered into system during an update process, such as:</p> <ul style="list-style-type: none"> Copies of data files or records from another system maintained by the agency 	Required for legal or audit purposes.	These records are not covered by the GRS. The input records must be scheduled.	N/A
	Not required for legal or audit purposes.	Destroy immediately after data have been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.	GRS 4.3, item 1b (DAA-GRS-2013-0001-0004)
<p>Electronic records received from another agency and used as input/source records, such as:</p> <ul style="list-style-type: none"> Copies of data files or records from a system in another agency 	Produced under an interagency agreement.	These records are not covered by the GRS. The input records must be scheduled.	N/A
	Created for specific information needs of receiving agency.		
	Neither produced under an interagency agreement nor created for specific information needs of receiving agency.	Destroy immediately after data have been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.	GRS 4.3, item 1b (DAA-GRS-2013-0001-0004)
<p>Uncalibrated and unvalidated data collected in observation or measurement activities or research and development programs, such as:</p> <ul style="list-style-type: none"> Scientific observational data from satellites Research experimental test data 		Destroy immediately after data have been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.	GRS 4.3, item 1b (DAA-GRS-2013-0001-0004)

Description of input records	Limitations imposed by the GRS	Instruction	GRS citation
Electronic records scheduled elsewhere and the system does not replace the source record, such as: <ul style="list-style-type: none"> • A case tracking system in which users input information from source records, but the records themselves remain a distinct entity outside the system 		These records are not scheduled in the GRS. Apply source system's existing authority or schedule source system if unscheduled.	N/A

Note: If the input records are in electronic format, any electronic files created specifically from one system as an input to another system must either be covered by the GRS or separately scheduled, even if the originating system is scheduled.

QUESTIONS ABOUT ITEMS 010, 011, AND 012 – HARDCOPY OR ANALOG INPUT/SOURCE RECORDS

15. Why does the GRS state that input records must be copied “in their entirety”?

The GRS states that input records must be copied in their entirety because otherwise the input record is not a duplicate of what is maintained in the master file and therefore the input record contains unique information that may change the value of the record. For example, a hardcopy source record could contain an annotation that is not clearly picked up when the record is scanned. Therefore the scan does not copy the input record in its entirety, the source record contains additional information not in the scanned version, and the source record may therefore have unique value.

This requirement does not apply only to scanned documents. Data may be entered from a form. If not all of the form's data is entered into the system, then the source record has not been copied in its entirety. One exception may be where a form is used to check a record already in the system. If information on the form already matches what is in the system, there is no need to update the information in the system. In that case, the source record is still being copied in its entirety because the information on the input form and in the system is the same. As long as there is a one-to-one relationship between the source record and the electronic version and they match, the source record is being copied in its entirety.

The requirement that input records be ingested in their entirety is not new. GRS 20, item 2a3, specified that hardcopy input/source records that contained information that was not or could not be captured in the electronic version of the records (e.g., certain handwritten annotations) must be disposed of according to the schedule for the hardcopy record.

16. When is it not appropriate to destroy input records once they are converted to an electronic format?

Agencies may find that in certain circumstances they have a business need for the source records even after they have converted the records to an electronic format. In such cases, agencies may determine

that it is not appropriate to apply the GRS for converted input/source records. Agencies should assess their business need for the source records and may establish a longer retention in their agency-specific disposition manuals without additional NARA approval. In some cases, source records may be or become part of another records series scheduled on an agency-specific schedule. In these cases, the agency-specific schedule should be applied rather than the GRS. For example, if the source record is part of another record, such as a case file, but the electronic version of the record is not a copy of the entire case file or has a separate purpose from the case file, then an agency-specific disposition authority may apply to the source record rather than the GRS.

QUESTION ABOUT ITEM 020 – ELECTRONIC INPUT/SOURCE RECORDS

17. Why are electronic input/source records created under an interagency agreement or in response to specific information needs of the receiving agency excluded from this item?

Records created under an interagency agreement are excluded because such an agreement is a legal document that is specific to that set of records, and may provide for additional retention requirements not in accordance with the GRS. Similarly, responses to specific information needs are excluded because they may have statutory or regulatory requirements. Both types of records may need to be retained longer than the minimum period in Item 020, to protect both the sending and receiving agencies.

QUESTION ABOUT ITEM 031 – OUTPUT RECORDS – DATA FILE OUTPUTS

18. Why are data file outputs from records scheduled as permanent, but that no longer exist or can no longer be accessed, excluded? How can a permanent record no longer exist or no longer be accessed?

Records may have been scheduled as permanent but the record itself may no longer exist or be inaccessible because it was lost, corrupted, or in some other way can no longer be opened or read. In that case, a data file output may be the only accessible version of the record and NARA might want to take the output record in place of the inaccessible/unavailable permanent master record. This note should not be interpreted to mean that outputs must be kept just in case the permanent record becomes inaccessible; it only means that, if you have the output records and the master file is inaccessible, you should contact NARA to see if you should transfer the output records instead.

QUESTION ABOUT ITEM 040 – NON-RECORDKEEPING COPIES OF ELECTRONIC RECORDS

19. Why does GRS 4.3 schedule non-recordkeeping copies?

Not all copies are non-record. Copies may still be records if they are used to make decisions or take actions, so they require an approved schedule for disposition. Non-recordkeeping means only that the record is not maintained for recordkeeping purposes. It is still a record.