

## **Frequently Asked Questions (FAQs) about GRS 5.2, Transitory and Intermediary Records**

Revised October 2017

### **INTRODUCTION**

#### **1. What is the purpose of GRS 5.2?**

GRS 5.2 provides disposition authority for records required only for a short time (transitory records) and records created or used in the process of creating a subsequent record (intermediary records) that an agency does not also need to meet legal or fiscal obligations, or to initiate, sustain, evaluate, or provide evidence of decision-making.

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

Please contact NARA's General Records Schedules Team at [GRS\\_Team@nara.gov](mailto:GRS_Team@nara.gov) with questions about this schedule.

### **CHANGES FROM THE OLD GRS**

#### **3. How does GRS 5.2 differ from its superseded General Records Schedules?**

The new item for Transitory Records (item 010) has not changed substantially from the items it supersedes (Suspense Files, GRS 23, items 6a and 6b, and Transitory Files, GRS 23, item 7). The main difference is in the list of examples, which has been updated to incorporate contemporary records.

Item 020, Intermediary Records, is a more substantial change. "Intermediary records" is a new concept to the GRS that covers various previously scheduled records, all with the same function of being a record used to create another record. The item incorporates a diverse range of records previously scheduled in the GRS, including merging the input and output records items from GRS 4.3 into a single item. We have also added coverage for unsubstantial working files.

### **QUESTION ABOUT ITEM 010 – TRANSITORY RECORDS**

For more information on applying this item to electronic messages, see [Frequently Asked Questions \(FAQs\) about Transitory Records in Electronic Messages](#).

#### **4. Why does this item include seemingly non-record materials such as "messages received from agency distribution lists or listservs" and "received copies of circulated internal information such as agency instructions, notifications, circulars, newsletters, and email blasts to employees"?**

While the records in question may be deemed non-record material by some agencies, other agencies are not as comfortable making this non-record determination. Just because a record is a copy does not mean that it is non-record. If it is used for decision-making or taking action, it is a record. Only reference copies are non-record documents. To assist agencies that do not want to declare these materials non-record, we have included them in their own item within GRS 5.2 (item 010), to clearly distinguish and

designate them as records of a transitory nature.

## **QUESTIONS ABOUT ITEM 020 – INTERMEDIARY RECORDS**

### **5. What constitutes a meeting in the second bullet in item 020?**

A meeting, for the purposes of this schedule, is the gathering (whether in person, via telephone, skype, other means, or combinations of these) of a body such as a board, commission, advisory group, committee, task force, or other assembling of Federal employees (or employees and members of the public), in which agency business is transacted or discussed (including staff meetings). A meeting does not include activities such as interrogations, interviews, or other instances where individuals are subject to questioning.

### **6. What are input or source records in the fourth bullet in item 020?**

Input records are the sources of information agencies enter into an electronic system. They support creating, updating, or modifying master files an agency keeps for recordkeeping purposes 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. This GRS applies only when a separate record is created. Input processes that do *not* create a separate input record include:

- Structured data the user enters from online forms, 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.)

### **7. Please explain the statement that to qualify as “intermediary,” a record must not be required to meet legal or fiscal obligations, or to initiate, sustain, evaluate, or provide evidence of decision-making.**

Agencies do not need most intermediary records to meet legal or fiscal obligations or to provide evidence of decision-making because the final record to which the intermediary record contributes fills that need. On rare occasion, an agency may require an intermediary record—for example, an original input/source document with a wet signature—to meet such obligations or to provide such evidence. In this case, the document is more than an intermediary record, and GRS 5.2, item 020, may not be used to dispose of it.

### **8. Can an electronic system’s content ever consist entirely of intermediary records?**

Yes. If a system’s sole function is to receive and integrate data from two or more other systems and export the resultant product to yet another independent system, it is known as a “pass-through system.” GRS 5.2, item 020 covers such a system’s content.

**9. What does “verification of successful creation” mean in the disposition instruction for item 020?**

“Verification of successful creation” 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 agencies should verify that they have successfully converted records to an electronic format.

**10. Why does this item’s fourth bullet include hardcopy input source documents only if all information on the document is incorporated into an electronic system?**

This item covers input source records only if all information on the document is copied into the electronic version because if it does not include all such information, the subsequent record does not exactly duplicate the input record. The input record therefore contains unique information that may change its value. For example, if a hardcopy source record contains an annotation not clearly included in the scanned copy, the scan does not entirely duplicate the input record. Therefore, the input record may have unique value and the agency should retain it.

Another example is data 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 a form 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 all the information in the source document has a one-to-one relationship to information in the electronic version and they match, the source record is being copied in its entirety.

**11. What are “inaccessible permanent records” in Exclusion 2? Why does item 020 exclude summarized information derived from such records?**

Electronic records may have been scheduled as permanent but the record may be lost, corrupted, or in some other way unable to be opened or read. In that case, a data file output containing summarized information may be the only accessible version of the record, and NARA might want to take this output record in place of the inaccessible/unavailable permanent master record. This exclusion 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.

**12. Under what conditions are input records covered or not covered by item 020?**

The following two tables explain the conditions under which input records are covered or not covered by item 020. If the input records are in hardcopy format:

Input record description	Source already scheduled?	Limitations	Instruction
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"> <li>• Data entered into system from a paper form</li> <li>• Scanned images/ PDFs of hardcopy records</li> </ul>	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.
		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.
		Schedule does not require hardcopy transfer or is silent on format of records to be transferred to NARA and electronic format meets transfer standards.	Use GRS 5.2, item 020. However, these records fall under Note 1 and may not be destroyed until 60 days after submission of a notification to NARA per 36 CFR 1225.24(a)(1) <u>and</u> verification of successful creation of the electronic version, but longer retention is authorized if required for business use.
	Yes; scheduled as temporary		Use GRS 5.2, item 020. Destroy immediately after verification of successful creation of the electronic version, but longer retention is authorized if required for business use.
No		Use GRS 5.2, item 020. However, these records fall under Note 1 and the electronic records must be scheduled prior to destruction of any input or source records <u>and</u> after verification of successful conversion, but longer retention is authorized if required for business use.	
Hardcopy records converted to electronic format but containing information not captured in electronic version, such as: <ul style="list-style-type: none"> <li>• Records with handwritten annotations</li> <li>• Records with layered attached notes</li> <li>• Color-dependent documents captured electronically only in black-and-white</li> </ul>	Yes		These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.
	No		These records are not covered by the GRS. Input record must be scheduled because it is unique.
Hardcopy records where the electronic version does not	Yes		These records are not covered by the GRS. Hardcopy records should be maintained and the existing disposition authority for the hardcopy records applied.

Input record description	Source already scheduled?	Limitations	Instruction
replace the source record, such as: <ul style="list-style-type: none"> <li>• A case tracking system in which users input information from source documents, but the documents themselves remain a distinct entity outside the system</li> </ul>	No		These records are not covered by the GRS. Input record must be scheduled because it is unique.

If the input records are in electronic format:

Description of input records	Limitations	Instruction
Electronic records used to create or update a master file, such as: <ul style="list-style-type: none"> <li>• Work files</li> <li>• Valid transaction files</li> <li>• Intermediate input/output records</li> </ul>		Use GRS 5.2, item 020. Destroy immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.
Electronic records entered into system during an update process, such as: <ul style="list-style-type: none"> <li>• Copies of data files or records from another system maintained by the agency</li> </ul>	Required for legal or audit purposes.	These records are not covered by the GRS. The input records must be scheduled.
	Not required for legal or audit purposes.	Use GRS 5.2, item 020. Destroy immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.
Electronic records received from another agency and used as input/source records, such as: <ul style="list-style-type: none"> <li>• Copies of data files or records from a system in another agency</li> </ul>	Produced under an interagency agreement or created for specific information needs of receiving agency.	These records are not covered by the GRS. The input records must be scheduled.
	Neither produced under an interagency agreement nor created for specific information needs of receiving agency.	Use GRS 5.2, item 020. Destroy immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.
Uncalibrated and unvalidated data collected in observation or measurement activities or research and development programs, such as: <ul style="list-style-type: none"> <li>• Scientific observational data from satellites</li> <li>• Research experimental test data</li> </ul>		Use GRS 5.2, item 020. Destroy immediately after data has been entered or otherwise incorporated into the master file or database and verified, but longer retention is authorized if required for business use.

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

**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 GRS 5.2, item 020, or be separately scheduled, even if the originating system is scheduled.

**13. When is it not appropriate to destroy input records according to item 020 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 period 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 item 020. 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 case file disposition authority, rather than item 020, may apply to the source record.