

## Frequently Asked Questions (FAQs) about GRS 5.4, Facility, Equipment, Vehicle, Property, and Supply Records

January 2017

### INTRODUCTION

#### 1. What is the purpose of GRS 5.4?

This schedule provides disposition authority for records agencies create and receive in the course of managing their physical plant and equipment; land, water, and air fleet; and supply chain.

#### 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.

### GENERAL QUESTIONS

#### 3. This schedule supersedes a great number of items from numerous different old schedules. Why are you merging so many disparate items and subjects into this one schedule?

This schedule supersedes 50 items scattered among an unusually large number of old schedules: GRS 3, 4, 10, 11, 15, and 17. Our plan for revising the GRS includes organizing the new schedules by function rather than subject. While the records concern disparate topics—buildings, landscape, furniture, machinery, equipment, vehicles (land, water, and air), and supply stock—they all relate to the same function: the agency's work processes of operating, managing, and maintaining its overall physical or "hard" footprint. As a result, we are bringing them together into one GRS based on that function.

#### 4. Why are you rescinding GRS 10, item 11a?

NARA called into question whether GRS 10, item 11a, Recordkeeping copies of maintenance manuals for unique or customized aircraft, belong in the GRS because they could only be created by a very few agencies.

### QUESTION RELATED TO ITEM 010

#### 5. Why does this item exclude General Services Administration (GSA) Global Supply requisition and supply records and Defense Logistics Agency (DLA) military supply records?

As noted in the item's Exclusion 3, these are program records of agencies whose mission is supply. The GRS does not cover agency mission records; agencies must schedule such records. Also, 40 U.S.C. 501(a)(2) states that the Department of Defense can opt out of GSA procurement processes. A 1971 agreement between GSA and DLA sorted out which agency supplies which goods to military establishments, based on whether the goods are deemed "military" in nature. For instance, reams of paper are not "military" but ammunition is. For this reason, these GSA and DLA records have agency-specific requirements that also make them inappropriate for a GRS.

## QUESTIONS RELATED TO ITEM 020

### **6. The old GRS authorized agencies to destroy some land title records ten years after unconditionally selling the property. Why does this item require agencies to transfer those same records to the new owner instead?**

Local government—usually the county in which the land is situated—creates, maintains, and is the legal custodian of records that legally establish land ownership and title succession. But sometimes county records are incomplete. Some courthouses burn. Deeds—for whatever reason—may not be recorded. In these and other instances, landowner-held records may prove rich supplements to or substitutions for missing county records.<sup>1</sup> Once the Federal Government releases land to another owner, its title records lose their legal value for the Federal Government, and eventually informational value, too. But there is no good reason for the Federal Government to destroy these records when the new or subsequent owners, as the new stewards of the land, may have business use for them.

### **7. What is a Report of Excess Real Property?**

Standard Form (SF) 118, Report of Excess Real Property, is not (despite the name “report”) a summary of completed work, but rather a notice of work about to begin. An SF-118 is the starting point for disposing of federally owned land and buildings. It is part of a real property disposition case file.

### **8. Why are records of real property disposition not covered by this item (Exclusion 2)?**

This item covers only very specific documents about real property *ownership*, not real property *disposition*. Major shifts in the Federal Government’s literal footprint often result in changes in the property’s disposition—such as disposing of land divested by the Government under the military Base Realignment and Closure (BRAC) work of 2005 and similar earlier efforts. Disposing of real property by sale and donation is often the subject of national or local controversy. National notoriety generally produces records appraised as having permanent value. Other records have lasting informational value to only a small geographic locale, which might be best served by donating the records to a local historical society or similar organization. We might therefore assess those records as temporary, with disposition instructions to donate them to that organization. Still other records may prove to have research value to nobody and we would assess them as temporary, with instructions to destroy. As a result, we cannot treat land disposition records consistently as a single series with identical value under all circumstances. They are therefore not appropriate to include in the GRS.

### **9. My agency has a schedule for real property disposition case files. Does this item supersede it?**

No. As discussed in question 8, this item covers only very specific documents about real property *ownership*, not real property *disposition*. Real property disposition records merit unique appraisal.

---

<sup>1</sup> A celebrated example is the Daniel Boone National Forest which assembled a rich trove of land ownership records when the Forest was established over a 9-county area largely by direct purchase of land from private individuals in the 1930s. Manuscript grant and purchase records dating in some cases from the 1830s document decades-old land transactions never recorded at county courthouses in efforts to dodge tax assessments.

**10. My agency has a schedule to permanently retain real property disposition case files. My files incorporate the records item 020 says are temporary (abstract or certificate of title). Can I transfer these temporary records to NARA as part of the permanent files?**

Only permanent records should be sent to the National Archives (NARA). If your real property disposition file has simply been incorporated into your ownership file for the same land/building, you should remove the temporary ownership records prior to proposing to transfer the permanent disposition records to NARA. The GRS instructs you to send these ownership records—abstract or certificate of title—to the new owner of the land for good reasons (see the response to question 6). These records should not still be in the files you transfer to NARA.

**QUESTION RELATED TO ITEM 030**

**11. Why don't you include vehicle title in the list of covered records?**

We do not include vehicle title as a covered record because it does not have the same disposition instruction as the other records. State law requires the seller to give a vehicle title to the new owner in the sale or release process. The GRS has no authority either to require transfer of a vehicle title, or to authorize its destruction.

**QUESTIONS RELATED TO ITEMS 050 AND 051**

**12. The GRS has never included records of facility construction before. Why are you doing it now?**

Construction is in the purview of many agencies; therefore, it is a business process common to many Federal agencies and is appropriate to include in a GRS. Some construction records—those concerning contracts—have been part of the GRS since its inception in the 1950s. But construction also creates engineering, design, and non-finance-related construction records whose business and reference value is common across the Government, so we are including them as well.

**13. Records in item 051 are kept until a structure is removed from Federal ownership. Some buildings the Government will never get rid of. Isn't this *de facto* permanent retention?**

Agencies should eventually transfer permanent records to the National Archives. By contrast, agencies retain temporary records only as long as required by statute or needed for business use. The business use of records described in item 051 may stretch over many decades, but still ends with demolition of the structure to which the records relate. But, Exclusion 2 makes clear that records documenting buildings of historical, architectural, or technological significance must instead be appraised individually to determine their value, which might be permanent in some cases. These include records on buildings the Government will never intentionally raze and, even if such a building were accidentally destroyed, the records documenting its one-time existence would then be even more valuable.

**14. Why would an agency want to keep all construction records until a facility is razed? Isn't that excessive?**

These items do not require all construction records to be retained for the life of a facility. Many records exist primarily to document the financial management of the contract(s) under which a building is erected. These are disposable under GRS 1.1, item 010, as noted in Exclusion 1. But other construction

records have enduring value to a physical plant's maintenance crew. As-built drawings often vary significantly from final design drawings, reflecting numerous change orders. As a result, these records are useful for the life of the facility.

**15. How can I tell if a building is historically or architecturally significant?**

Criteria for establishing a structure's historical or architectural significance are available in the National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation," published by the National Park Service, which is responsible for the National Register of Historic Places:  
<https://www.nps.gov/nr/publications/bulletins/pdfs/nrb15.pdf>.

**QUESTIONS RELATED TO ITEM 100**

**16. 14 CFR 91.417 contains a detailed list of records that agencies must retain and transfer with an aircraft when selling it. Why are these records not included in the GRS, citing 14 CFR 91.417 as the legal authority?**

The records 14 CFR 91.417 requires agencies to transfer with an aircraft upon sale fall into two categories. The first is certain maintenance records: "Copies of the forms prescribed by §43.9(d) of this chapter for each major alteration to the airframe and currently installed engines, rotors, propellers, and appliances." The GRS covers these records under item 100. The second category is time-specific records that cannot be compiled as a discrete series until very near the date of sale: "total time in service of the airframe, each engine, each propeller, and each rotor; the current status of life-limited parts of each airframe, engine, propeller, rotor, and appliance; the time since last overhaul of all items installed on the aircraft which are required to be overhauled on a specified time basis; the current inspection status of the aircraft, including the time since the last inspection required by the inspection program under which the aircraft and its appliances are maintained; and the current status of applicable airworthiness directives (AD) and safety directives." A GRS item for records an agency creates and compiles for the sole purpose of immediate transfer outside of agency ownership would be pointless. The GRS also does not cite 14 CFR 91.417 as a legal authority because, in keeping with GRS policy, we reference CFR and U.S. Code citations only if they directly address the length of time agencies must maintain the records.

**17. In the Disposition Instruction for item 100, what does "disposing of aircraft" mean?**

For purposes of this disposition instruction, "disposing of aircraft" means either its destruction or its sale, donation, or other permanent transfer to a non-Federal entity.

**QUESTION RELATED TO ITEMS 100, 110, AND 120**

**18. Why do items 100 and 120 exclude records of the Air Force, Navy, Army, and Federal Aviation Administration, and item 110 exclude records of vehicles designed for military use?**

Aircraft (items 100 and 120), when they exist at all in the inventory of most Federal agencies, are small planes used primarily for quick executive travel. Aircraft used by military branches and FAA are more likely to be involved with agency mission. A similar situation applies to item 110. Military organizations' fleets contain many commonly used vehicles such as cars and trucks, and records relating to such vehicles are covered by item 110. But the sole purpose of some vehicles (for example, amphibious

assault vehicles) is intertwined with agency mission. They are therefore excluded from item 110. Mission records are always scheduled by the creating agency.

**QUESTION RELATED TO ITEM 140**

**19. How does this item relate to the very similar GRS 5.6, item 100, Accident and incident records?**

Many vehicle accidents are likely to create records in both the office that manages the fleet and the office that deals with investigations. This item (GRS 5.4, item 140) schedules the former. GRS 5.6, item 100, covers the latter. These files may contain many records in common, but agencies retain them to document different business functions. For that reason, we have assigned them different retention periods based on agency need for the records.