
The New GRS

A Plan for
Restructuring and
Updating the General
Records Schedules

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GRS Team, Records
Management Services, Office
of the Chief Records Officer

THE NEW GRS: A Plan for Restructuring and Updating the General Records Schedules

Table of Contents

1	Executive Summary.....	2
2	The GRS Team	3
3	Why We are Restructuring the GRS.....	3
4	Our Goals for the New GRS.....	4
5	How We Developed Our Plan	5
6	The Plan for Revising the GRS.....	5
7	Project Timeline	7
8	Appendix A - Structure of the New GRS.....	9
9	Appendix B - Focus Group Issues and Suggestions	29
10	Appendix C - Questions & Answers from the GRS Restructuring Project Focus Group Sessions ...	32
10.1	General Questions	32
10.2	Questions about the Project Timeline	34
10.3	Questions about the GRS Update Process.....	35
10.4	Questions about Specific Sections	38
11	Appendix D - Summary of Changes.....	40

1 Executive Summary

The Office of the Chief Records Officer created the GRS Team in Records Management Services to focus on updating and revising the General Records Schedules. The GRS Team has taken this opportunity to assess the GRS, its current problems, and how it might better serve Federal agencies. This assessment began by surveying Federal records management staff as well as staff in the Office of the Chief Records Officer. The survey identified a number of problems and deficiencies in the current GRS, as well as gathered numerous suggestions for improvement.

Based on our findings, the Team proposes a complete update and overhaul of the existing General Records Schedules. The new structure seeks to align the General Records Schedules along common

functions based in part on the Federal Enterprise Architecture (FEA). The Team plans to use business process analysis to identify both temporary and permanent records series within each of these functions. This analysis will then be used to create more comprehensive General Records Schedules using flexible, bucket scheduling techniques as much as possible.

2 The GRS Team

The GRS Team provides leadership to and collaborates with agencies and NARA staff to develop and implement General Records Schedules that are relevant, easy to use, and meet the needs of the Federal records management community. Our mission is to perform necessary updates and revisions to the General Records Schedules and develop new schedules to be responsive to the evolving needs of Federal agencies. We also serve as subject matter experts and promote better understanding about the GRS to enable consistent implementation by agencies and fellow NARA staff.

The members of the GRS Team are Andrea Riley (Team Lead), Jennie Guilbaud, Laura McHale, Susan Means, Leslie Watson, and Galen Wilson.

3 Why We are Restructuring the GRS

The primary directive of the GRS Team is to update and revise the General Records Schedules, many of which date back to the 1950s and 1970s. The team conducted a study to look into new ways of structuring the GRS. We knew that the existing General Records Schedules did not meet current agencies' needs, were out of date, did not reflect all records created by current administrative processes, and had retentions that were not applicable to electronic records. The purpose of the study was to develop a plan for revising the General Records Schedules to be flexible, usable, understandable and implementable.

The intent of the project was to determine how to proceed with updating the General Records Schedules. Specifically, we sought to determine whether or not the General Records Schedules can and should be restructured, and if so how. We also proposed that the project would result in an overall plan for revising the General Records Schedules, including a schedule for updating chapters.

The first step in the project was to gather information from agency and NARA appraisal staff about issues with the existing GRS. In May 2012 we conducted a survey of staff and agencies. The survey was sent to Federal records officers via an RM Communication and to staff in the Office of the Chief Records Officer. We received 64 responses from agency records management staff and 11 responses from appraisal staff.

The survey identified the following general issues with the current GRS:

- Needs to be written in plain English
- Formatting is inconsistent
- Too granular

- Series descriptions are too vague
- Duplication of record series in multiple schedules
- May not reflect how records are currently maintained
- Includes records series that no longer exist
- Need for updates to reflect:
 - Media neutrality
 - Electronic formats/automation; technology change
 - Current business practices/processes
 - Current terminology

We also received a number of suggestions for improving the GRS:

- Use a functional approach, employing bucket scheduling
- Add permanent authorities
- Remove disposition instructions that only reference other authorities; provide hyperlinks if necessary
- Remove or separate filing instructions
- Provide more guidance and training for implementation
- Use cutoff instructions
- Standardize retention periods
- Include legal citations relating to records retentions where appropriate
- Describe the level of the office which the records would be found
- Compile the GRS into a single schedule
- Provide search capability
- Create a subject index and/or crosswalk for all schedules

We used this input to develop goals for a revised GRS.

4 Our Goals for the New GRS

Based on the responses from the GRS Survey, the team has set the following goals for the new GRS:

- Functional arrangement
- Aggregate records into buckets where useful/possible
- True media neutrality: no more series based on format
- Broader, comprehensive coverage of *all* common Federal records Addition of permanent series
- Clear series descriptions
- More specific examples and crosswalks
- Standardized retentions
- Consistency

5 How We Developed Our Plan

To meet the goals of a more functionally aligned GRS, the Team looked at the Federal Enterprise Architecture (FEA)¹ as a starting point for identifying common functions/sub-functions throughout the Federal government. A previous NARA team had already mapped the existing GRS to the FEA, which aided in this process. While the FEA helped to identify common lines of business across the Federal government, we did make some additions and alterations. Once we had identified and described functions and sub-functions to include in the restructured GRS, we mapped current GRS items to them.

We then conducted focus group sessions, inviting agencies and NARA staff to review our proposal and provide feedback. We received approximately 350 comments, questions or suggestions on the original proposal. The team reviewed these comments and further revised the plan. We also compiled questions from the focus group sessions into an FAQ about the plan that is attached as Appendix C. A summary of changes to the plan can be found in Appendix D.

6 The Plan for Revising the GRS

The plan for revising the GRS, outlined in Appendix A, is a working document. The plan identifies 14 functional areas, each divided further into sub-functions. Each sub-function will constitute one or more separate schedules. As we conduct further analysis of sub-functions we may find it more logical to combine some, further subdivide others, and move still others around.

Please note that not all records related to a specific function may be appropriate for the GRS. The scope of the GRS has not really changed; it is still intended to cover only records common to all or most Federal agencies. More significantly, however, if retention needs for records are too variable across agencies we will not be able to determine a common disposition instruction and therefore cannot schedule the records in a GRS.

The structure of the new GRS has been revised rather significantly from our originally proposed plan (a summary of changes is in Appendix D). The Team has divided the functions into two categories: Administrative Support Functions and Mission Support Functions. Administrative Support Functions include activities related to managing agency administrative operations, such as procurement, human resources, and security. These functions are largely scheduled by the current GRS. Most of the new functional areas and those most likely to contain permanent series fall under Mission Support Functions. Mission Support Functions include activities common to most or all agencies that relate to support of the agency's mission, such as strategic planning, public affairs, and developing policies and regulations. Definitions for each function and the sub-function within each function are in Appendix A. Neither these functions nor their sub-functions are intended to be the

¹ Further information on the FEA can be found at www.whitehouse.gov/omb/e-gov/fea. The Team used the 2007 version of the FEA, which was the version available when we were developing our plan. OMB released the latest version of the FEA was released this past summer.

actual buckets under which records will be aggregated and scheduled. Any buckets will be at a process or activity level. The functions and sub-functions only identify the general structure for the new GRS and the organizational structure of the published version of the GRS.

Administrative Support Functions

1. Finance Management
2. Human Resources Management
3. Technology Management
4. Information Management
5. General Operations Support

Mission Support Functions

6. Executive Leadership
7. Public Affairs
8. Legal Support
9. Legislative & Congressional Relations
10. Planning & Budget
11. Policy & Regulation
12. Regulatory Compliance & Enforcement
13. Research & Development
14. Temporary Commissions, Boards, Councils and Committees

The next step will be to start developing specific schedules via a four-phase standardized process: information collection and analysis, schedule drafting, appraisal/approval, and publishing/implementation. Stakeholders, both internal and external, will have opportunities to provide input and feedback during every phase. We will seek stakeholder input to further define the scope of schedules and identify potential issues, to assist in identifying records and retention needs, and to ensure that new schedules are clear, concise, and implementable.

The information collection and analysis phase will involve the most significant work towards developing the new schedules. We will review pertinent documentation (regulations, guidance, previously approved schedules) and conduct focus group sessions on specific topics to get a sense of the scope of activities to be analyzed and issues to be resolved. Following that, we will contact agencies to gather information about specific work processes and the records they create so that we can develop schedule requirements (records series to include, business needs, etc.) We will analyze specific business processes under each sub-function to determine where records are created or captured as part of the process, identify potential record buckets, and enable us to draft flexible and complete schedules. Not all records can be bucketed, however. Some records are controlled by regulations or laws that will not allow us or may make it difficult to combine records into buckets.

The final product will be schedules that may or may not include big bucket items, crosswalks or implementation guides (similar to the table in GRS 24) that identify specific records covered by a

disposition authority, and crosswalks to identify superseded GRS items. Once a final schedule is approved we will also provide briefings and FAQs as necessary. Final schedules will be available both as the NARA approved schedule located on the Records Control Schedule page of archives.gov and published online in a manual-like version on that site's GRS page. We also plan to provide guidance to agencies on updating their manuals to reflect changes in the GRS and how to request exceptions to the GRS.

7 Project Timeline

In the GRS Survey we asked agencies and CRO staff to identify their priorities for updating the GRS.

Their priorities were:

- GRS 20 (now 4.2 Records Related to Electronic Systems)
- GRS 1 (now 2.3 General Employee Management)
- GRS 23 (now 5.1 General Administration)
- GRS 2 (now 2.4 Employee Compensation & Benefits)
- GRS 16 (now 4.1 Records & Information Management)
- GRS 24 (now dispersed through various sub-section of 3. Technology Management)
- GRS 3 (now under various parts of 5. General Operations Support and 1.5 Grants)
- GRS 27 (dispersed over various functions)
- GRS 9 (now 5.3 Travel & Transportation)
- GRS 14 (now 4.1 Records & Information Management)

We also received comments that GRS 1 (now 2. Human Resource Management) is outdated per current regulations and that GRS 3, 4, 5, 7 and 8 (now 1. Finance Management) do not meet audit requirements.

Based on these priorities and comments we developed a 5-year plan for developing the new GRS schedules. Overall, the plan is intended to ensure that most of the existing GRS authorities are updated and revised within the first three years. We also have attempted to balance the number of schedules we will be working on for a given year as some functional areas understandably produce a greater variety of records requiring schedules.

FY 13

- 1. Finance Management (5 sub-functions)
- 3. Technology Management (3 sub-functions)
- 4. Information Management (2 sub-functions)

FY 14

- 2. Human Resources Management (9 sub-functions)
- 14. Temporary Commissions, Boards, Councils and Committees

FY 15

- 5. General Operations Support (9 sub-functions)

- 6. Executive Leadership

FY 16

- 7. Public Affairs (3 sub-functions)
- 10. Planning & Budget (3 sub-functions)
- 11. Policy & Regulation (2 sub-functions)

FY 17

- 8. Legal Support
- 9. Legislative & Congressional Relations (3 sub-functions)
- 12. Regulatory Compliance & Enforcement (3 sub-functions)
- 13. Research & Development

For FY13, we identified Finance Management as a high-level priority because it covers parts of GRS 3, 4, 5, 7 and 8, which do not meet current audit requirements. We selected Technology Management and Information Management because they include GRS 14, 16, 20 and 24, which are all top-ten priorities.

For FY14, we selected Human Resource Management because GRS 1 was in the top three for revision. Human Resources Management had to be moved to the second year of the plan due to the fact that it includes 9 sub-sections. The outdated audit requirements affecting financial records outweighed the need to update Human Resources Management. We chose Temporary Commissions, etc. because it is part of the current GRS that needs to be updated.

For FY15, General Operations Support and Executive Leadership are together because these are the two sections where email is likely to be scheduled. The new email guidance is due December of 2012 and we wanted to be sure that the guidance was issued before we addressed email in the GRS.

For FY16 and FY17, the order of these sections was largely based on significance of the records and an attempt to keep the work fairly balanced.

8 Appendix A - Structure of the New GRS

This appendix is a table describing the arrangement and sections of the future GRS. Each sub-section (X.X level) and the few sections with no sub-sections will be approached as a schedule that will contain disposition items as yet to be determined. The table describes the functional categories (both high-level as well as sub-functions, it lists the existing GRS items that have been mapped to the sub-function, and also identifies new records series or activities that may be added. The records identified in this table, either currently scheduled in the GRS or records that may be added, are not meant to be a comprehensive list of records to be covered by the schedule. This table merely identifies those records that have been identified to date. Please also note that this table does not identify how items will be bucketed in the new GRS.

Schedule & Description	Existing GRS mapped to this sub-function	Records that may be included
1. Finance Management: Finance Management covers routine, operational management of agency finances including activities related paying bills and obligations, collecting debts, accounting for all financial interactions to enable audit, and distributing funds as part of grants or loans.		
1.1 Goods & Services Acquisition: Goods and Services Acquisition involves the procurement of physical goods, products, and capital assets to be used by the federal government. It also includes the oversight and/or management of contracts, contractors and service providers from the private sector.	GRS 3, item 1a: Real Property Files GRS 3, items 3a1a-b & 3b-d: Routine Procurement Files GRS 3, items 5b1, 5b2a & 5c1: Solicited and Unsolicited Bids and Proposals Files GRS 3, items 6a & 6b: Public Printer Files GRS 3, item 7: Nonpersonal Requisition Files GRS 3, item 10: Telephone Records GRS 3, item 11: Contractors' Payroll Files GRS 3, item 12: Tax Exemption Files GRS 3, item 15b: Contract Appeals Case Files GRS 3, item 16: Contractor's Statement of Contingent or Other Fees GRS 3, item 17: Small and Disadvantaged Business Utilization Files GRS 3, items 18a & 18b: Federal Activities Inventory Reform (FAIR) Act Records GRS 17, item 5: Contract Negotiation Drawings	Inter-Service Support Agreements (ISSA) Military Interdepartmental Purchase Requests (MIPR) Government-to-government services Contractor agent agreements
1.2 Payments: Payments include disbursement to vendors for goods and services, and distribution of entitlements, benefits, grants, subsidies, loans, or claims.	GRS 6, item 7: Gasoline Sales Tickets GRS 6, items 10a, 10b1, 10b2a-b, 10b3, & 10c: Administrative Claims Files [Claims against government] GRS 6, items 11a & 11b: Waiver of Claims Files [Claims against government] GRS 6, item 8: Telephone Toll Tickets GRS 6, item 9: Telegrams	International Merchant Purchase Authorization Cards (IMPAC)

Schedule & Description	Existing GRS mapped to this sub-function	Records that may be included
<p>1.3 Collections: Collections includes the collection of Government income from all sources (excluding taxation).</p>	<p>GRS 6, items 10a, 10b1, 10b2a-b, 10b3, & 10c: Administrative Claims Files [Claims by government] GRS 6, items 11a & 11b: Waiver of Claims Files [Claims by government]</p>	<p>User Fees Debt collection</p>
<p>1.4 Accounting: Accounting is the process of monitoring financial assets and liabilities, recording and reporting both income from all sources and expenses to all payees to enable audit. Federal accounting standards and requirements are set by the Department of the Treasury, the Federal Accounting Standards Advisory Board, the General Accountability Office, and the Office of Management and Budget. Accounting also includes accumulating and analyzing cost information to assist in establishing an agency’s strategic goals and safeguarding resources to meet objectives. This function includes activities related to accounting in both official accounting offices as well as in line offices.</p>	<p>GRS 6, items 1a & 1b: Accountable Officers' Files GRS 6, item 2: GAO Exceptions Files GRS 6, items 3a & 3b: Certificates Settlement Files GRS 6, item 4: General Fund Files GRS 6, items 5a & 5b: Accounting Administrative Files GRS 7, item 1: Expenditures Accounting General Correspondence and Subject Files GRS 7, item 2: General Accounting Ledgers GRS 7, item 3: Appropriation Allotment Files GRS 7, items 4a & 4b: Expenditure Accounting Posting and Control Files GRS 8, item 1: Plant, Cost, and Stores General Correspondence Files GRS 8, item 2: Stores Invoice Files GRS 8, item 3: Stores Accounting Files GRS 8, item 4: Stores Accounting Background Files GRS 8, item 5: Plant Accounting Files GRS 8, items 6a & 6b: Cost Accounting Reports GRS 8, items 7a & 7b1-3: Cost Report Data Files</p>	

Schedule & Description	Existing GRS mapped to this sub-function	Records that may be included
<p>1.5 Grants: Grants involves the disbursement of funds to a nonfederal entity to help fund projects or activities. This includes the processes associated with grant administration, including the publication of funds availability notices, development of the grant application guidance, determination of grantee eligibility, coordination of the peer review/evaluation process for competitive grants, the transfer of funds, and the monitoring/oversight as appropriate. Grants management may also include the allocation of money to states or their subdivisions as formula grants or earmarked grants or the funding, of project/competitive grants such as fellowships, scholarships, research grants, training grants, traineeships, experimental and demonstration grants, evaluation grants, planning grants, technical assistance grants, survey grants, and construction grants.</p>	<p>GRS 3, item 13: Unsuccessful Grant Application Files GRS 3, item 14: Grant Administrative Files</p>	<p>Pre- and post-award grant administration systems Cooperative agreements Loans</p>

2. Human Resources Management: Human Resource Management involves all activities associated with the recruitment and management of personnel, both in formal Human Resources offices and in line offices.		
<p>2.1 Human Resource Strategy: HR Strategy develops effective human capital management strategies to ensure federal organizations are able to recruit, select, develop, train, and manage a high-quality, productive workforce in accordance with merit system principles. This sub-function includes: conducting both internal and external environmental scans; developing human resources and human capital strategies and plans; establishing human resources policy and practices; managing current and future workforce competencies; developing workforce plans; developing succession plans; managing the human resources budget; providing human resources and human capital consultative support; and measuring and improving human resources performance.</p>	<p>GRS 1, item 16: Personnel Operations statistical reports</p>	<p>Employee surveys</p>

<p>2.2 Staff Acquisition: Staff Acquisition establishes procedures for recruiting and selecting high-quality, productive employees with the right skills and competencies, in accordance with merit system principles. This sub-function includes: developing a staffing strategy and plan; establishing an applicant evaluation approach; announcing the vacancy, sourcing and evaluating candidates against the competency requirements for the position; initiating pre-employment activities; and hiring employees. This function also includes the design, development, and implementation of organizational and position structures.</p>	<p>GRS 1, items 4a & 4b1-3: Offers of Employment Files GRS 1, item 5: Certificate of eligibles Files GRS 1, items 7a1, 7a2a-b, 7b, 7c1-2, & 7d1-2: Position Classification Files GRS 1, item 8: Interview Records GRS 1, item 10b: Temporary individual employee records – INS form I-9 GRS 1, items 33a-t: Examining and Certification Records</p>	<p>Employment interview records (specifically including interview records for applicants that are not hired)(see also 5 CFR 335.103) SF-85 Public Trust</p>
<p>2.3 General Employee Management: General Employee Management involves functions related to day-to-day management of employees as well as management of employees throughout the course of their career after hiring and prior to separation. Besides the maintenance of personnel files, this sub-function includes activities such as employee performance management; managing administrative grievances; providing employee accommodation; administering employees assistance programs; participating in administrative third party proceedings; and determining candidate and applicant suitability.</p>	<p>GRS 1, items 1a & 1b: OPFs GRS 1, item 2: Service Cards or equivalent GRS 1, item 6: Employee record cards GRS 1, item 9: Performance Rating Board Case Files GRS 1, item 10a: Temporary individual employee records – Left side of OPF GRS 1, items 14a & 14b: Notifications of Personnel Actions GRS 1, items 17a-c (sub-items): Correspondence and Forms GRS 1, items 18a & 18b: Supervisors' Personnel Files and Duplicate OPF Documentation GRS 1, items 23a (sub-items) & 23b (sub-items): Employee Performance File System Records GRS 1, items 24a-d: Reasonable Accommodation Request Records GRS 1, items 25a-h (sub-items): EEO Records GRS 1, items 26a & 26b: Personnel Counseling Records GRS 1, items 30a & 30b: Administrative Grievance, Disciplinary & Adverse Action Files GRS 1, item 32: Merit Promotion Case Files GRS 1, item 40: Handicapped Individuals Appointment Case Files GRS 1, items 42a-c: Alternative Worksite Records</p>	<p>In house TDYs</p>

<p>2.4 Employee Compensation & Benefits: Employee Compensation and Benefits Management designs, develops, and implements compensation programs that attract, retain, support and fairly compensate agency employees. This sub-function includes: developing and implementing compensation programs; administering bonus and monetary awards programs; administering pay changes; managing time, attendance, leave and pay; and managing payroll, establishing and communicating benefits programs; processing benefits actions; and interacting as necessary with third party benefits providers.</p>	<p>GRS 1, item 12a1-2 & 12b-d: Employee Awards Files GRS 1, item 13: Incentive awards GRS 1, items 35a & 35b1-2: Denied health benefits request under spouse equity GRS 1, item 37: Donated Leave Program Case Files GRS 1, item38: Wage Survey Files GRS 1, item 41: Pay comparability records GRS 2, items 1a & 1b: Individual Employee Pay Record GRS 2, item 2: Noncurrent Payroll Files GRS 2, items 6a & 6b: Leave Application Files GRS 2, item 7: Time and Attendance Source Records GRS 2, item 8: Time and Attendance Input Records GRS 2, items 9a & 9b: Leave Record GRS 2, items 13a-c: Tax Files GRS 2, items 14a-c: Savings Bond Purchase Files GRS 2, items 15a & 15b: Combined Federal Campaign and Other Allotment Authorizations GRS 2, item 16: Thrift Savings Plan Election Form GRS 2, item 17: Direct Deposit Sign-up Form GRS 2, item 18: Levy and Garnishment Files GRS 2, items 22a-c: Payroll System Reports GRS 2, items 23a & 23b: Payroll Change Files GRS 2, item 28: Retirement Files GRS 9, item 7: Federal Employee Transportation Subsidy Records</p>	<p>Family Medical Leave Act (FMLA) – Leave Records</p>
<p>2.5 Employee Separation Management: Employee Separation Management conducts efficient and effective employee separation programs that assist employees in transitioning to non-Federal employment or retirement.</p>	<p>GRS 1, item 39: Retirement Assistance Files</p>	<p>Records related to separation of Presidential appointees Exit questionnaires and supervisory instructions and checklists Retiree separation questionnaire and instruction Separation tracking logs</p>

<p>2.6 Employee Training: Employee Training designs, develops, and implements a comprehensive employee development approach to ensure that agency employees have the right competencies and skills for current and future work assignments. This sub-function includes conducting employee training needs assessments; designing employee training programs; administering and delivering employee training programs; and evaluating the overall effectiveness of the agency's employee training approach. Employee training is widely defined to mean all types of professional development, both internal and external training, developmental assignments, details, coaching or mentoring, etc.</p>	<p>GRS 1, item 29a1-2 & 29b: Training Records GRS 21, item 3: Internal Personnel and Administrative Training Filmstrips and Slides of Programs that do not reflect the Mission of the Agency GRS 21, item 9: Films Acquired from Outside Sources for Personnel and Management Training (Motion Pictures) GRS 21, item 14: Programs Acquired from Outside Sources for Personnel and Management Training (Video Recordings) GRS 21, item 17: Internal Personnel and Administrative Training Programs that do not Reflect the Mission of the Agency (Video Recordings)</p>	<p>Learning Management Systems Training materials Training files not created by offices where training is the main function Career Advancement and Intern Work Program Mentoring programs Routine training videos on demand</p>
<p>2.7 Employee Health & Safety: Employee Health and Safety involves activities related to maintaining the health and safety of employees in the workplace. This sub-function includes activities related to health units, personal and occupational injury, workplace drug testing, etc.</p>	<p>GRS 1, item 19: Non-occupational health records GRS 1, items 20a & 20b: Health Unit Control Files GRS 1, items 21a1-2 & 21b-c: Employee Medical Folder (EMF) GRS 1, item 22: Statistical summaries re: health GRS 1, item 31: Personal Injury Files GRS 1, item 34: Occupational Injury/Illness Files GRS 1, items 36a-c, 36d1-2, 36e1a-b, & 36e2: Federal Workplace Drug Testing Program Files</p>	<p>Health and Safety records (see OSHA standards web page that lists 10 most common standards with appropriate records retentions) Hazardous materials records</p>
<p>2.8 Employee Ethics: Employee Ethics includes activities of executive branch agency ethics program offices and provides disposition for financial disclosure reports; ethics agreements; outside employment and activity records; referrals of violations of criminal conflict of interest statutes; ethics determination, advice, consultation, and training records; and other commonly held ethics program records.</p>	<p>GRS 25, items 1a & 1b: Ethics Program Implementation, Interpretation, Counseling and Development Files GRS 25, items 2a-c (sub-items): Financial Disclosures Reporting Files GRS 25, item 3: Ethics Agreement Records GRS 25, item 4: Referrals and Notifications of Violations of Criminal Conflict of Interest Statutes and Other Potential Violations Files GRS 25, items 5a & 5b: Non-Federally Funded Travel GRS 25, items 6a & 6b: Ethics Program Review Files GRS 25, items 7a & 7b: Annual Agency Program Questionnaire Files GRS 25, items 8a & 8b: Ethics Program Employee Training and Education Files GRS 25, item 9: Ethics Program Procedures Files</p>	

<p>2.9 Labor Relations: Labor Relations manages the relationship between the agency and its unions and bargaining units. This includes negotiating and administering labor contracts and collective bargaining agreements; managing negotiated grievances; and participating in negotiated third party proceedings.</p>	<p>GRS 1, items 27a & 27b: Alternative Dispute Resolution (ADR) Files GRS 1, item 28a1-2 & 28b: Labor Management Relations Records</p>	
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<p>3. Technology Management: Technology Management includes the development and maintenance of technology resources and systems required to support or provide services within an agency.</p>		
<p>3.1 System Development: System Development supports all activities associated with the in-house design and development of software applications and involves the processes that facilitate a smooth evolution, composition, and workforce transition of the design and implementation of changes to agency resources such as assets, methodologies, systems, or procedures.</p>	<p>GRS 16, item 9: Feasibility Studies</p>	<p>Privacy Threshold Analyses (PTAs) Privacy Impact Assessments (PIAs) System of Record Notices (SORNs)</p>
<p>3.2 IT Infrastructure & System Maintenance: IT Infrastructure and System Maintenance involves the design and maintenance of an agency's IT Infrastructure.</p>	<p>GRS 20, items 1a: Files/Records Relating to the Creation, Use, and Maintenance of Computer Systems, Applications, or Electronic Records—Records created to test system performance GRS 24, item 1a: Oversight and Compliance Files - Performance measurements and benchmarks GRS 24, item 1b: Oversight and Compliance Files - All other Oversight and compliance records GRS 24, item 2: IT Facility, Site Management and Equipment Support Services Records GRS 24, items 3a & 3b1-2: IT Asset and Configuration Management Files GRS 24, items 8a-c: IT Operations Records GRS 24, items 9a-c: Financing of IT Resources and Services GRS 24, items 11a-c: IT Infrastructure Design and Implementation Files</p>	

<p>3.3 Information Systems Security: Information Systems Security involves all functions pertaining to the protection of federal information and information systems from unauthorized access, use, disclosure, disruptions, modification, or destruction, as well as the creation and implementation of security policies, procedures and controls.</p>	<p>GRS 18, item 2: Document Receipt Files (Classified) GRS 18, item 3: Destruction Certificates Files (Classified) GRS 18, item 4: Classified Document Inventory Files GRS 18, items 5a & 5b: Top Secret Accounting and Control Files GRS 18, item 6: Access Request Files (Classified) GRS 18, items 7a & 7b: Classified Document Container Security Files GRS 18, items 25a & 25b: Classified Information Nondisclosure GRS 20, items 1c: Files/Records Relating to the Creation, Use, and Maintenance of Computer Systems, Applications, or Electronic Records—Records created to monitor system usage GRS 20, items 8a & 8b: Backups of Files GRS 24, items 4a1-2 & 4b: System Backups and Tape Library Records GRS 24, items 5a & 5b: Files Related to Maintaining the Security of Systems and Data [Note potential overlap with 10.2 Emergency Planning] GRS 24, items 6a & 6b: User Identification, Profiles, Authorizations, and Password Files GRS 24, item 7: Computer Security Incident Handling, Reporting, and Follow-up Records GRS 24, items 13a1-2 & 13: PKI Records</p>	<p>Records relating to management of Personally Identifiable Information (PII)</p>
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4. Information Management: Information Management includes the management of records and other information resources required to support or provide services within an agency.

<p>4.1 Records & Information Management: Records and Information Management involves operations relating to the management of the official documents and records for an agency and the coordination of information collection, storage, and dissemination, and destruction. It also includes managing the policies, guidelines, and standards regarding information management.</p>	<p>GRS 14, items 11a1, 11a2a, 11a3a & 11b: FOIA Requests Files GRS 14, items 12a & 12b: FOIA Appeals Files GRS 14, items 13a & 13b: FOIA Control Files GRS 14, item 14: FOIA Reports Files GRS 14, item 15: FOIA Administrative Files GRS 14, items 21a1, 21a2a, 21a3a & 21b: Privacy Act Requests Files GRS 14, items 22a-c: Privacy Act Amendment Case Files GRS 14, item 23: Privacy Act Accounting of Disclosure Files GRS 14, items 24a & 24b: Privacy Act Control Files GRS 14, item 25: Privacy Act Reports Files GRS 14: item 26: Privacy Act General Administrative Files GRS 14, items 31a (sub-items) & 31b-c: Mandatory Review For Declassification Requests Files GRS 14, items 32a & 32b: Mandatory Review for Declassification Appeals Files GRS 14, items 33a & 33b: Mandatory Review for Declassification Control Files GRS 14, item 34: Mandatory Review for Declassification Reports Files GRS 14, item 35: Mandatory Review for Declassification Administrative Files GRS 14, item 36a & 36b: Erroneous Release Files GRS 16, items 2a1-2 & 2b: Records Disposition Files GRS 16, items 3a & 3b: Forms Files GRS 16, items 4a & 4b: Records Holdings Files GRS 16, item 7: Records Management Files GRS 16, items 10a & 10b: Microfilm Inspection Records GRS 16, item 11: IRM Triennial Review Files GRS 16, item 12: Information Collection Budget Files GRS 20, item 9: Finding Aids (or Indexes) GRS 21, item 28: Production Files or Similar Files that Document Origin, Development, Acquisition, Use and Ownership of Temporary Audiovisual Records GRS 21, item 29: Finding Aids for Identification, Retrieval, or Use of Temporary Audiovisual Records GRS 23, item 8: Tracking and Control Records GRS 23, item 9: Finding Aids or Indexes</p>	<p>Library administrative records Records Management program records Paperwork Reduction Act collections of information Documentation of record destruction Records declassification Privacy Program functions such as privacy breach reporting Vital records planning</p>
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<p>4.2 Records Related to Electronic Systems: Records related to electronic systems provides disposal authorization for certain electronic records and for specified paper, microform, or other hard copy records that are integrally related to electronic systems.</p>	<p>GRS 20, items 1b: Files/Records Relating to the Creation, Use, and Maintenance of Computer Systems, Applications, or Electronic Records—Input/source records GRS 20, items 2a1-4 & 2b-c: Input/Source Records GRS 20, items 3a & 3b1-4: Electronic Versions of Records Scheduled for Disposal GRS 20, item 4: Data Files Consisting of Summarized Information GRS 20, item 5: Records Consisting of Extracted Information GRS 20, item 6: Print File GRS 20, item 7: Technical Reformat File GRS 20, items 11a1 & 11a2a: Documentation GRS 20, items 12a-c: Downloaded and Copied Data GRS 20, item 13: Word Processing Files GRS 20, item 14: Electronic Mail Records GRS 20, item 15a & 15b: Electronic Spreadsheets GRS 20, item 16: Hard Copy Printouts Created to Meet Ad Hoc Business Needs</p>	
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5. General Operations Support: General Operations Support includes functions common in most or all agencies that support the general operation of the agency. These activities do not relate to an agency's program or mission and may be referred to as housekeeping duties.		
5.1 General Administration: General administration includes day-to-day housekeeping activities such as administrative correspondence and subject files and the calendars of non-executive level staff.	<p>GRS 1, item 3: Personnel Correspondence Files</p> <p>GRS 2, item 24: Payroll Correspondence</p> <p>GRS 3, item 2: General Correspondence Files</p> <p>GRS 4, item 1: Property Disposal Correspondence Files</p> <p>GRS 7, item 1: Expenditures Accounting General Correspondence and Subject Files</p> <p>GRS 8, item 1: Plant, Cost, and Stores General Correspondence Files</p> <p>GRS 10, item 1: Motor Vehicle Correspondence Files</p> <p>GRS 11, item 1: Space and Maintenance General Correspondence Files</p> <p>GRS 13, Item 1: Administrative Correspondence Files</p> <p>GRS 13, Item 6: Internal Management Files</p> <p>GRS 15, item 1: Housing General Correspondence Files</p> <p>GRS 16, item 5: Project Control Files</p> <p>GRS 18, item 1: Classified Documents Administrative Correspondence Files</p> <p>GRS 18, item 8: Security and Protective Services Administrative Correspondence Files</p> <p>GRS 21, Item 23: Dictation Belts or Tapes (Audio/Sound Recordings)</p> <p>GRS 23, Item 1: Office Administration Files</p> <p>GRS 23, Item 5a and 5b: Schedules of Daily Activities</p> <p>GRS 23, Item 6a and 6b: Suspense Files</p> <p>GRS 23, Item 7: Transitory Files</p> <p>GRS 27, Item 7: Schedules of Daily Activities</p>	
5.2 Inventory Control: Inventory Control refers to the tracking of information related to procured assets and resources with regard to quantity, quality, and location.	<p>GRS 3, items 4a & 4b: Supply Management Files</p> <p>GRS 3, items 8a & 8b: Inventory Requisition Files</p> <p>GRS 3, items 9a-c: Inventory Files</p>	
5.3 Travel & Transportation: Travel and Transportation involves the planning and tracking of personnel and resources in relation to their availability and location. This function includes activities related to transportation of goods and official travel by personnel.	<p>GRS 9, items 1a-e: Commercial Freight and Passenger Transportation Files</p> <p>GRS 9, item 2: Lost or Damaged Shipment Files</p> <p>GRS 9, items 3a & 3b: Noncommercial, Reimbursable Travel Files</p> <p>GRS 9, items 4a & 4b: General Travel and Transportation Files</p> <p>GRS 9, items 5a-c: Records Relating to Official Passports</p> <p>GRS 21, item 2: Passport Photographs (Still Photography)</p>	Systems used to for booking travel and employee reimbursement (e.g. GovTrip)

<p>5.4 Facilities, Fleet & Equipment: Facilities, Fleet, and Equipment involves the maintenance, administration, and operation of office buildings, fleets, machinery, and other capital assets that are possessions of the federal government.</p>	<p>GRS 4, item 2: Excess Personal Property Reports GRS 4, items 3a & 3b: Surplus Property Case Files GRS 4, item 4: Real Property Files GRS 10, item 2a & 2b: Motor Vehicle Operating and Maintenance Files GRS 10, item 3: Motor Vehicle Cost Files GRS 10, item 4: Motor Vehicle Report Files GRS 10, item 5: Motor Vehicle Accident Files GRS 10, item 6: Motor Vehicle Release Files GRS 10, item 7: Motor Vehicle Operator Files GRS 10, item 9: Routine Aircraft Operations GRS 10, item 10: Logistical Support for Flight Operations GRS 10, item 11a & 11b: General Aircraft Maintenance and Modification Records GRS 10, item 12: Individual Aircraft Maintenance and Airframe Modification Records GRS 10, item 13: Records Required for Accident/Incident Records GRS 11, item 2a, 2b1, & 2b2: Agency Space Files GRS 11, item 3: Directory Service Files GRS 11, item 5: Building and Equipment Service Files GRS 15, item 2a & 2b: Housing Maintenance and Repair Files GRS 15, item 3: Housing Management Files GRS 15, item 4: Housing Lease Files GRS 15, item 5a & 5b: Housing Assignment and Vacancy Card Files GRS 15, item 6: Housing Inventory Files GRS 15, item 7a & 7b: Housing Application Files GRS 17, item 3: Architectural Drawings of Temporary Structure and Buildings or of Buildings Not Critical to the Mission of the Agency GRS 17, item 4: Drawings of Electrical, Plumbing, Heating, or Air Conditioning Systems GRS 17, item 6: Space Assignment Plans GRS 17, item 8: Engineering Drawings of Routine Minor Parts GRS 17, item 9: Drawings Reflecting Minor Modifications GRS 17, item 10: Paint Plans and Samples</p>	<p>Watercraft maintenance and operation records (similar to those already in the GRS for aircraft)</p>
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<p>5.5 Mail and Telecommunication Services: Mail and Telecommunication Services involves functions related to administration of services used to send and receive information in the course of conducting business such as managing use of messenger services, telecommunications, and postal/mail services. Note: This category does not include the actual communications themselves.</p>	<p>GRS 12, item 1: Messenger Service Files GRS 12, item 2a-e: Communication General Files GRS 12, item 3a & 3b: Telecommunications Operational Files GRS 12, item 4: Telephone Use (Call Detail) Records GRS 12, item 5a-c: Post Office and Private Mail Company Records GRS 12, item 6a-h: Mail and Delivery Service Control Files GRS 12, item 7: Metered Mail Files GRS 12, item 8: Postal Irregularities Files</p>	<p>Records related to administration of electronic mobile devices Records related to FedEx/UPS service use</p>
<p>5.6 Security: Security involves the physical protection of an organization’s personnel, assets, and facilities (including security clearance management). Note: Activities related to securing data and information systems are addressed under the “Information Systems Security” Sub-function.</p>	<p>GRS 11, items 4a & 4b: Credentials Files GRS 18, item 9: Survey and Inspection Files (Government-owned facilities) GRS 18, item 10: Survey and Inspection Files (privately owned facilities) GRS 18, item 11: Investigative Files GRS 18, item 12: Property Pass Files GRS 18, items 13a & 13b: Guard Assignment Files GRS 18, items 14a-c: Police Functions Files GRS 18, items 15a & 15b: Personal Property Accountability Files GRS 18, items 16a & 16b: Key Accountability Files GRS 18, items 17a & 17b: Visitor Control Files GRS 18, items 18a & 18b: Facilities Checks Files GRS 18, items 19a-d: Guard Service Control Files GRS 18, items 20a & 20b: Logs and Registers (Guards) GRS 18, item 21: Security Clearance Administrative Subject Files GRS 18, items 22a-c: Personnel Security Clearance Files GRS 18, item 23: Personnel Security Clearance Status Files GRS 18, items 24a & 24b: Security Violations Files GRS 21, item 2: Personnel Identification photographs (Still photography) GRS 21, item 11: Routine Surveillance Footage (Motion Pictures) GRS 21, item 18: Routine Surveillance Recordings (Video Recordings)</p>	<p>Personal Identity Verification cards</p>
<p>5.7 Workplace Policy: Workplace Policy includes all activities required to develop and disseminate administrative policies such as dress codes, time reporting requirements, telecommuting, etc.</p>	<p>GRS 16, items 1a & 1b: Administrative Issuances</p>	

<p>5.8 Management Controls & Oversight: Management Controls and Oversight relates to ensuring that internal operations and programs comply with applicable laws and regulations as well as the agency's procedures and plans while preventing waste, fraud, and abuse. Functions include program evaluation (analysis of internal and external program effectiveness and the determination of corrective actions as appropriate), program monitoring (data gathering activities required to determine the effectiveness of internal and external programs and the extent to which they comply with related laws, regulations, and policies), and corrective action (the enforcement of activities to remedy internal or external programs that have been found noncompliant with a given law, regulation, or policy). This sub-function also includes reports sent to external agencies related to compliance with administrative laws and regulations. NOTE: This does not include agency activities related to external control and oversight. Those activities are generally specific to an agency's mission and should be scheduled by the agency.</p>	<p>GRS 16, item 6: Reports Control Files GRS 16, Items 14a-f: Management Control Records GRS 13, items 5a & 5b: Joint Committee on Printing (JCP) Reports Files GRS 27, Item 4: Legal and Regulatory Compliance Records</p>	<p>Inspector General Records OMB Circular A-123, Management's Responsibility for Internal Control Performance and Accountability Reports</p>
<p>5.9 Internal Help Desk Services: Help Desk Services involves the management of a service center to respond to government and contract employees' technical and administrative questions.</p>	<p>GRS 24, 10a & 10b: IT Customer Service Files</p>	

6. Executive Leadership		
<p>Executive Leadership includes certain common records created or maintained by high-level officials and their offices. High-level officials may include but are not limited to Commissioners, Chief Information Officers (CIOs), Chief Financial Officers (CFOs), etc. The definite of high-level officials will be further described at the time of scheduling.</p>	<p>GRS 27, item 5: CIO Committee Records GRS 27, item 6: CIO Subject and Office Records</p>	<p>Speeches, written statements and other official communications such as public advisories(if issues by executive office) Calendars Incoming and outgoing correspondence (including e-mail) Correspondence tracking Meeting minutes and agendas Executive Leaders' blogs Decisional documents authorizing action (i.e. decision memoranda signed by agency official authorizing a new program, etc., commission written vote documents) Press interview discussion point and individual submitted quotes Briefing materials for Congressional communications, testimony and policy decisions or official public meetings Subject files</p>

7. Public Affairs: Public Affairs involves the exchange of information and communication between the federal government, citizens and stakeholders in direct support of citizen services, public policy, and/or national interest.		
<p>7.1 Official Information: Official Information includes activities related to the creation of official government information. These activities include not only the development of official information, but also the final product itself. They may not include the dissemination of information, however, which is often a function of External Relations.</p>	<p>GRS 21, item 1: Activities not Related to the Mission of the Agency (Still Photography) GRS 21, item 5: Viewgraphs GRS 21, item 6: Routine Artwork for Handbills, Flyers, Posters, Letterhead, and Other Graphics GRS 21, item 7: Line and Halftone Negatives, Screened Paper Prints and Offset Lithographic Plates Used for Photomechanical Reproduction GRS 21, item 8: Line Copies of Graphs and Charts GRS 21, item 12: Routine Scientific, Medical, or Engineering Footage (Motion Pictures) GRS 21, item 16: Rehearsal or Practice Tapes (Video Recordings) GRS 21, item 19: Routine Scientific, Medical, or Engineering Recordings (Video Recordings) GRS 21, item 24: Premix Sound Elements Created During the Course of a Motion Picture, Television, or Radio Production (Audio/Sound Recordings)</p>	<p>Mission related photographs Publications (but possibly not research publications) Records created by agency history offices</p>
<p>7.2 External Relations: External Relations involves the management of relationships between the agency, its external stakeholders, and other agencies. Activities involve information dissemination, responding to information requests, and managing relationships with stakeholders such as the press.</p>	<p>GRS 13, item 2a & 2b: Project Files GRS 13, item 3: Control Files GRS 13, item 4a & 4b: Mailing Lists GRS 14, item 1: Information Requests Files GRS 14, item 2: Acknowledgment Files GRS 14, item 3: Press Service Files GRS 14, item 4: Information Project Files GRS 14, item 6: Indexes and Check Lists GRS 16, Item 13a & 13b: Documents Published in the Federal Register GRS 21, item 26: Daily or Spot News Recordings Available to Local Radio Stations on a Call-in Basis (Audio/Sound Recordings)</p>	<p>Press Releases, public statements Responses to press inquiries News articles submitted by agency for publication Copies of video or taped interviews(including transcripts) News clip files Communication logs or inquiry tracking Conferences Web sites</p>
<p>7.3 Customer Service: Customer service relates to managing relationships between the agency and its customers. Activities involve providing support and information to external agency customers and marketing of agencies services. This also includes the management of service centers to respond to external questions and issues about agency services.</p>	<p>GRS 14, item 5: Commendation/Complaint Correspondence Files</p>	<p>Customer feedback Fundraising/development files Customer Service Desk records Customer surveys</p>

8. Legal Support (New)		
Legal Support includes functions related to providing legal advice and support for mission or program activities.	There are no records in the current GRS related to this sub-function.	<ul style="list-style-type: none"> Litigation activities Subject files Incoming and outgoing correspondence Agency decision making actions and their justifications Agency Agreements (MOUs) Policy consultations Administrative files for litigation and holds/records freezes

9. Legislative & Congressional Relations (New): Legislative Relations involves activities aimed at the development, tracking, and amendment of public laws through the legislative branch of the federal government.		
9.1 Congressional Liaison Operations: Congressional Liaison Operations involves all activities associated with supporting the formal relationship between a federal agency and the U.S. Congress.	There are no records in the current GRS related to this sub-function.	<ul style="list-style-type: none"> Requests from Congress on behalf of constituent Congressional reports (if not covered elsewhere) Congressional communications/correspondence Appropriations reprogramming and appropriations/authorization committee notification letters (if not covered under Budgeting) Legislative analysis documents Responses to Congressional requests Congressional Appropriations Grant tracking and communications Communication logs GAO communications Responses to CBO requests for information
9.2 Legislation Development: Legislation development involves drafting proposed legislation that creates or amends laws subject to Congressional action, including tracking and monitoring legislation from introduction to enactment.	There are no records in the current GRS related to this sub-function.	<ul style="list-style-type: none"> Legislative proposals Background information, intra and inter-agency review and decisional documents

<p>9.3 Congressional Testimony: Congressional Testimony involves activities associated with providing testimony/evidence in support of, or opposition to, legislation.</p>	<p>There are no records in the current GRS related to this sub-function.</p>	<p>Congressional testimony, both oral and written Congressional investigation testimony Responses to questions asked while giving Congressional testimony Responses to official Questions for the Record (QFRs)</p>
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<p>10. Planning & Budget: Planning and Budget involves agency-level planning related activities such as determining strategic direction, identifying and establishing programs and processes, risk management, disaster preparedness, developing agency budgets, and allocating resources (capital and labor) among those programs and processes.</p>		
<p>10.1 Agency Planning: Agency Planning includes the high-level programmatic planning processes such as capital, strategic, agency performance, enterprise architecture, and workforce planning, and management improvement.</p>	<p>GRS 27, item 3: Information Technology Capital Investment Records GRS 27, item 2: Enterprise Architecture Records</p>	<p>Organizational charts and records Mission statements Project Authorization File GPRA-related planning</p>
<p>10.2 Emergency Planning: Emergency Planning/Continuity of Operations involves activities related to the processes of planning, responding to, and mitigating damaging events. It also involves activities associated with the identification of critical systems and processes, and the planning and preparation required to ensure that these systems and processes will be available in the event of a catastrophic event (known as Continuity of Operations planning, of COOP).</p>	<p>GRS 18, Item 26: Emergency Planning Administrative Correspondence Files GRS 18, Item 27: Emergency Planning Case Files GRS 18, Item 28: Emergency Operations Test Files GRS 18, Item 29a and 29b: National Defense Executive Reserve (NDER) Case Files GRS 24, item 5: Files Related to Maintaining the Security of Systems and Data [Note potential overlap with 3.3 Information System Security]</p>	<p>Continuity of Operations Planning (COOP)</p>
<p>10.3 Budgeting: Budgeting is composed of planning (determining priorities for future spending and forecasting future funding and expenditures) and execution (distribution of budget authority to achieve results consistent with the formulated budget).</p>	<p>GRS 5, item 1: Budget Correspondence GRS 5, item 2: Budget Background Records GRS 5, items 3a & 3b: Budget Reports Files GRS 5, item 4: Budget Apportionment Files</p>	<p>Final budget records Budget formulation files (Congressional Budget Submissions, Congressional Hearings, Questions from the House and Senate, OMB Submissions, Budget Instructions, Press Briefing, Incoming and Outgoing Correspondence/Memoranda and Briefing Books)</p>

11. Policy & Regulation (New): Policy and Regulation includes activities related to developing and publishing agency policy, guidance, and regulations.		
11.1 Policy & Guidance Development: Policy and Guidance Development involves activities associated with developing and issuing regulations, policies, and guidance to implement laws. These activities may occur at any level within an agency.	There are no records in the current GRS related to this sub-function.	Public comments and tracking
11.2 Regulatory Creation & Publication: Regulatory creation and publication involves the activities of researching, drafting proposed and final regulations, and the publication of a proposed or final rule in the Federal Register and Code of Federal Regulations.	There are no records in the current GRS related to this sub-function.	Rules and proposed rules Public notices of Federal agencies Rulemaking systems

12. Regulatory Compliance & Enforcement (New): Regulatory Compliance and Enforcement involves the direct monitoring and oversight of a specific individual, group, industry, or community participating in a regulated activity.		
12.1 Inspections & Auditing: Inspections & Auditing involves the examination and review of government regulated activities to ensure compliance with standards for the activity. This includes activities such as inspecting or conducting audits of industries for compliance with government regulations.	There are no records in the current GRS related to this sub-function.	
12.2 Standard Setting/Reporting Guideline Development: Standard Setting / Reporting Guideline Development involves the establishment of allowable limits associated with a regulated activity and the development of reporting requirements necessary to monitor and control compliance within allowable limits. This includes the development of requirements for product sampling and testing, emissions monitoring and control, incident reporting, financial filings, etc.	There are no records in the current GRS related to this sub-function.	
12.3 Permits & Licensing: Permits and Licensing involves activities associated with granting, revoking, and the overall management of the documented authority necessary to perform a regulated task or function.	There are no records in the current GRS related to this sub-function.	Permits, licenses, and/or certifications of external entities involved in regulated activities

13. Research & Development		
Research and Development involves the gathering and analysis of data, dissemination of results (including general purpose data and statistics), and development of new products, methodologies, and ideas.	It is possible that items in GRS 20 related to data files may end up in this schedule.	Publicly released data sets Record related to data mining

14. Temporary Commissions, Boards, Councils & Committees		
This section covers records created and maintained by temporary commissions, boards, councils and committees (including continuing entities governed by renewable charters such as agency advisory committees).	GRS 26, item 1a: Internal Agency Committees GRS 26, items 2a-b & 2c1-3: Records Created by Advisory Commissions GRS 26, item 3: Committee Records Not Maintained by the Sponsor GRS 26, item 4: Committee Management Records	

9 Appendix B - Focus Group Issues and Suggestions

During the focus group sessions the GRS Team received a number of comments that highlighted issues that may need to be addressed or suggestions to keep in mind as we update the GRS.

The following general issues or suggestions were made:

- Records created using social media tools are not currently subject to media neutrality rules. Our intent is that the GRS will be truly media neutral, including records created using social media tools. This may require changes to the CFR.
- Disposition authorities need to include a clear cutoff (or closure)² and a retention period based on the cutoff to ensure that disposition instructions can be incorporated into an RMA. Similarly, RMAs cannot implement instructions with contingencies (i.e. “Destroy when three years old or no longer needed for current business, whichever is later”). Disposition instructions with contingencies should be avoided as much as possible.
- Cutoff instructions need to include both a time frame (end of fiscal or calendar year) as well as an event (e.g. “when case closes”).
- The new GRS will cover electronic systems. It is likely that disposition instructions appropriate for paper records will not be applicable to electronic systems. Some electronic systems cannot be cutoff because records are constantly updated throughout their life cycle. This will be an issue we have to address case by case.
- Some of the functions that we are proposing to include in the new GRS have been scheduled in the GRS previously but rescinded because of disagreement or conflict about retention periods. We hope that new scheduling techniques, such as flexible bands for temporary records, may allow us to schedule these records. However, if retentions cannot be agreed upon the records will not be included in the GRS and agencies will continue to have to schedule them individually.

Specific Issues and Suggestions

2.1 Human Resource Strategy

- There is potential overlap between this sub-function and other sub-functions such as Workplace Policy and Agency Planning that will have to be addressed when we analyze this section further.

2.2 Staff Acquisition

- We received a request to include specific disposition instructions for Position Classifications, Performance Standards, and Vacancy Announcements that are used and/or developed outside formal Human Resources offices, such as program offices hiring

² We have received a number of comments about including clear cutoffs or closures in GRS disposition instructions. There appears to be some confusion about the use of the terms “cutoff” versus “closure”. As far as NARA is concerned they are the same thing: the point at which the retention period starts. The new GRS schedules will be created using ERA. ERA uses the term “cutoff,” so the new GRS schedules and related documents will use the term “cutoff.”

managers. We are planning on making sure there are clear authorities for records in line offices as well as formal Human Resource offices.

2.3 General Employee Management

- This section needs to address whether or not it will be limited to Civil Service employees, or whether it might also include Military, volunteers, etc. If it is limited to Civil Service the new GRS needs to be explicit about the exclusions.

2.4 Employee Compensation & Benefits

- Suggested that current GRS 2, item 6b, should have the same retention as GRS 2, item 7, because they are often maintained together.

2.7 Employee Training

- The current GRS 1, item 29a, excludes “other training aides developed by agency.” Clarification is needed as to what is included under this category.

2.8 Employee Health and Safety

- The current GRS is silent about HIPPA/Privacy Act implications related to employee health records. We will need to determine whether there are implications as far as the GRS is concerned.

3.3 Information System Security

- Note that there is potential for overlap between records covered by the current GRS 24, item 5 in both this section and 10.2 Emergency Planning. This overlap will have to be resolved.

4.2 Records Related to Electronic Systems

- A suggestion has been made that some of the current GRS 20 items proposed to be included in this section should be in 13. Research and Development, which will include general purpose data and statistics. The items in question are:
 - GRS 20, item 11a(2), System Documentation
 - GRS 20, item 4, Data Files Consisting of Summarized Information
 - GRS 20, item 5, Records Consisting of Extracted Information
 - GRS 20, item 6, Print File
 - GRS 20, item 7, Technical Reformat File
 - GRS 20, item 10, Special Purpose Programs (which will likely be removed from the GRS because it is software and not record material)
 - GRS 20, item 12, Downloaded and Copied Data

5.3 Travel & Transportation

- Travel vouchers are currently under GRS 6 with a 6 year/3 month retention while the rest of travel records are under GRS 9. A request has been made to put all travel documents in a single GRS and to sync the retentions.

6. Executive Leadership

- The schedule will need to define what constitutes a “high level official.” Senior officials differ between agencies. The description may need to include exclusions as well as inclusions.
- There is a potential overlap between this section and other Mission Support section such as Public Affairs, Legislative & Congressional Relations, and Planning & Budget that will need to be addressed during scheduling.
- NARA custodial units have expressed concern about a blanket permanent retention for executives’ email regardless of the value of the content. Criteria may need to be developed to identify permanent vs. temporary email.

10.2 Emergency Planning

- There is a potential for overlap between this sub-function and other functions related to continuity of operations for electronic systems (which may fall under section 3. Technology Management) and vital records planning (under 4.1 Records & Information Management). This overlap will have to be resolved.

13. Research & Development

- Confidential Information Protection and Statistical Efficiency Act (CIPSEA) regulations regarding statistical data affect the ability to schedule permanent records for transfer to NARA. Current CIPSEA regulations restrict data indefinitely.

14. Temporary Commissions, Boards, Councils and Committees

- We received a suggestion to note that permanent Boards will require their own Record Group.

10 Appendix C - Questions & Answers from the GRS Restructuring Project Focus Group Sessions

10.1 General Questions

1. Should I proceed with scheduling records that are going to be covered by the GRS?

If an agency needs something ahead of our timetable, go ahead and schedule the records. There is no guarantee that new record series proposed for the GRS will ultimately be included. Many factors may either delay certain series or prevent their inclusion in the GRS.

2. Will NARA stop accepting schedules or processing schedules already in the queue pending new GRS schedules?

If an agency has a business need to schedule records that will be covered by the GRS, please do so. NARA will not stop accepting or processing schedules because the records are going to be covered by the GRS unless an agency asks us to. We are making our plan available to agencies so they are aware of when functions will be revised and can plan their own scheduling activities with that information in mind.

3. Will new GRS items supersede agency-specific disposition authorities?

According to the 36 CFR 1227.12 agencies must use new or revised GRS only when the GRS states that the provisions must be followed without exception. If your agency has an existing schedule and the new or revised GRS permits use of existing agency-specific schedules you may choose to follow either your agency-specific disposition instruction or the GRS, provided the same instruction is used throughout the agency. If you agency choose to follow its own schedule you must notify NARA within 120 days of the issuance of the new or revised GRS.

4. If the new GRS does not meet an agencies disposition needs, what does the agency need to do?

If an agency chooses not to follow the GRS (either the current version or the revised version) it can request an exception. If the GRS does not meet an agency's needs for a particular series of records, the agency must schedule the records on an agency-specific schedule that requests an exception to the GRS. Our goal, however, is to work with agencies to identify retention periods that work for everyone with rare exception.

5. How can an agency request an exception to the GRS?

NARA will issue further information about how and when to request exceptions. If you request a GRS exception in order to use an existing agency-specific schedule you must

inform NARA in writing within 120 days of the issuance of a new applicable GRS. If the agency submits a new agency-specific schedule item to use instead of a GRS item, the schedule should indicate that the item is an exception to the GRS.

6. Given that some items in the current GRS do not meet agency business needs or audit requirements is the GRS still considered mandatory?

The GRS is still mandatory unless an agency has requested an exception. The GRS Team has prioritized certain functions that do not meet present audit requirements so that those series can be rescheduled as soon as possible. In the meantime, records should be kept for whichever retention (GRS or regulation) is longer.

7. Will the GRS continue to be mandatory, especially for some of the permanent series that are proposed?

The GRS is mandatory, yes, but agencies can still request exceptions. Agencies will be involved in selecting and constructing language to describe permanent GRS items. All interested parties will have some say in what these items are and how they are structured.

8. How will agencies be made aware as GRS updates become available?

The GRS Team plans multiple ways to keep agencies informed about its progress. We will provide regular status reports. New GRS schedules will be distributed via an RM Communication once they are approved. They will also be published online: both the actual schedule (posted to the Records Control Schedule online repository at www.archives.gov/records-mgmt/rcs/) and a records manual type version at www.archives.gov/records-mgmt/grs/ (similar to what is currently posted online for the GRS).

9. The New GRS proposes to include permanent records. Are there permanent records in the current GRS that will no longer be permanent or temporary items that will become permanent?

The GRS currently only contains two permanent items: one for system documentation for permanent electronic systems and one related to Temporary Commissions Boards, Councils and Committees. We cannot say at this time how existing series might change. Permanent series will likely remain permanent. Disposition for some temporary records could change if the value of the records has changed since they were originally scheduled.

10. What is an example of permanent records that may be newly covered by a revised GRS?

Many sections proposed for the GRS will likely include permanent records. Mission Support Functions—such as Executive Leadership, Public Affairs, and Legal Support—will contain permanent records. Specific series will be identified as these schedules are developed.

11. Are the permanent records that may be added to the GRS the same permanent records that were once in the GRS and then removed?

It is possible that permanent records previously removed from the GRS will be added back during revisions. For example, GRS 22 (Inspector General records) was rescinded because records were not maintained the same way government-wide and NARA received multiple exception requests. With the introduction of flexible schedules, we may now be able to use retention bands to resolve that issue. Former GRS permanent items will be reviewed for appropriateness in the new GRS. Permanent items that were never before in the GRS will doubtless be added.

12. What is the rationale for taking permanent records out of the GRS in the past, but adding them now?

There are many reasons why permanent records were removed from the GRS in the past. Inspector General records were removed because their management varied too much from agency to agency. Other series were removed because NARA found that agencies did not apply disposition authorities properly. We will revisit some of these issues because newer scheduling methods allow for more flexibility in how records are scheduled. NARA also seeks to consider ways to reduce the burdens of scheduling and appraisal. Recognizing permanent series common across government is an excellent way to accomplish this.

13. How will media neutral play into all the new GRS?

The current GRS was declared media neutral in 2007, but many items are either media specific or have disposition instructions that cannot be applied to records in all formats. Our intent is to create a truly media neutral GRS with series descriptions inclusive of all record formats and disposition instructions applicable to records regardless of format. In order to achieve this for permanent records, permanent series may have multiple transfer instructions based on format, as occurs in many agency-specific schedules.

10.2 Questions about the Project Timeline

1. How will the Presidential Memo affect this effort, or how does this effort fit into the Memo?

The Presidential Memo Directive requires that the GRS be updated by December 31, 2017. We recognize that some of the other requirements in the directive may indirectly relate to the work of the GRS Team, such as the requirement to schedule all paper and non-electronic

records by December 31, 2016. Agencies may find themselves required to schedule records that may end up covered by the GRS the following year. The timeframe for revising the GRS cannot be condensed, however, due to the extent of work required to update the schedules.

2. Why will it take five years to complete this project? Why can you process sometimes only two schedules a year?

We propose a complete rescheduling of the GRS. Our plan is to start from the ground up looking at work processes under each function we have determined to include in the new GRS, identifying records associated with those processes and current business needs for those records. Then we must analyze that information, identify how we might aggregate series in buckets, and draft new schedules and take them through the approval process. This is a massive undertaking for a relatively small team. Additionally, many sections we seek to create in the next few years contain multiple sub-functions. Each sub-function comprises a schedule, so we actually plan to draft and approve ten or more schedules a year.

3. Is your team doing the GRS update project in addition to your day job?

The GRS update is our day job. The GRS Team was formed to specifically address updating and revising the GRS. While we do have other responsibilities within the Office of the Chief Records Officer and a few additional projects, the GRS update is our primary focus.

10.3 Questions about the GRS Update Process

1. What criteria were used to determine which items were mapped to each section?

Most of the mapping of existing GRS items to sub-functions was based on work conducted by a previous NARA team that mapped the GRS to the Federal Enterprise Architecture lines of business. The GRS Team used this initial mapping as well as the description of each sub-function when determining where existing GRS items would fall.

2. What does it mean to “bucket” GRS items?

Bucketing is a scheduling technique that aggregates records series with a similar function under one disposition authority.

3. As you bucket items will you be going with the longest retention period?

We generally will use longest retention period, but may use flexible retention bands where it makes sense.

4. Is NARA providing crosswalks for all legacy GRS items to the new?

We will provide crosswalks with each new schedule identifying legacy GRS items superseded by the schedule.

5. Are any legacy GRS items being retired?

There are a few items in the current GRS that we suspect may no longer be in use. We will review these items to ensure that the new GRS reflects records currently being maintained.

6. Will NARA be soliciting agency participation in developing new GRS schedules?

We plan to work closely with agencies to gather information about processes, their related records, and business needs for those records. We will solicit agency volunteers in general and approach some agencies specifically for individual schedules.

7. For records stored at the FRC, is there already a plan in place for NARA to provide crosswalks so the FRC will have the new retentions?

We will create crosswalks for each new schedule identifying superseded GRS items. The FRC Program is one of our internal stakeholders in the rescheduling process and we will communicate with them so that they are well-informed about changes affecting records in storage. These crosswalks, however, will only cover records retired by agencies under old GRS authorities. Records retired under agency specific schedules that are covered by new GRS authorities will not be covered in these crosswalks.

8. Transfer instructions for permanent records sometimes differ for electronic and paper formats. How clearly will the difference between the need to transfer special media records early versus the longer agency retention of paper records be delineated for the permanent GRS items?

To accommodate the different transfer needs for permanent records, permanent authorities in the GRS will have specific instructions based on media type, for instance, "Transfer hard-copy records in 5-year blocks 15 years after the last cutoff. Transfer electronic records 5 years after cutoff."

9. Will the GRS cover common vital records categories?

We do not plan to specifically address vital records per se in the GRS. Many vital records are already covered by the GRS and will continue to be so. The new GRS items may identify certain items as vital records individually, but will not aggregate these items into a "Vital Records" category.

10. Will the new GRS bucket master files, inputs, outputs and documentation for administrative electronic systems?

The new GRS will include records maintained in administrative electronic systems. We cannot say at this time exactly what the schedules will look like and whether records will or will not be bucketed. We will have a better sense once we begin analyzing the records.

11. Will the new GRS schedules include cutoff or closure instructions?

The use of cutoff or closure instructions in records schedules is not mandatory, but it is good records management practice. It is especially important for agencies using Records Management Applications (RMAs). We intend to include cutoff instructions in the new GRS wherever practical. We also intend that any cutoff instruction in the GRS will include both a timeframe (at the end of the fiscal year) and an event (when case is closed).

12. Do you distinguish "cutoff" from "closure"? Which triggers the start of the retention period?

We consider "cutoff" and "closure" to be the same thing: what starts the retention clock starts ticking. New GRS schedules will be created in the Electronic Records Archive (ERA), which uses the term "cutoff instruction."

13. Will keyword search capability be built in to the new GRS?

A rudimentary form of keyword search is currently available in the online version of the GRS. Instructions are provided on the GRS page at archives.gov. We do have a technology refresh project in mind to make the web version of the GRS more dynamic. We do not know, however, when we will be able to pursue this project.

14. Have you given thought to expanding the GRS to include program or mission functions common to multiple (but not all) agencies, such as homeland security or community and social services?

Yes, but it is out of scope for the current GRS. The Federal Enterprise Architecture (FEA) does identify lines of business throughout the government that could be used to schedule program records that share the same function across different agencies. While the GRS Team has discussed such a project as a future possibility, the scope of the current GRS is support functions common to all Federal agencies. Agencies are already free to cooperatively develop unique schedules for use by multiple agencies addressing a function or work process they share in common.

15. There are discussions of an update to the Federal Enterprise Architecture (FEA). Has the proposed GRS already accommodated the draft changes to the FEA?

We used the FEA as a starting point and guide and made changes to the overall structure to better reflect how we understand records to be created and maintained in agencies. Our plan does not map exactly to the FEA, but we will review revisions to the FEA to assess whether or not they may impact our plans.

16. Will the new GRS provide opportunity to develop NARA guidance on applying GRS and agency-specific schedules to records created on mobile devices like Blackberries, SmartPhones, and Tablets?

Records management regulation and guidance development are outside the scope of the GRS update project. However, we know that we will identify such issues and have already in some cases brought these issues to the attention of others within the Office of the Chief Records Officer. Currently, records created via mobile devices are not excluded from media neutrality rules, so existing schedules can already be applied to them. The real issue is capturing and managing these records, which is well outside the scope of the GRS.

10.4 Questions about Specific Sections

1. Why isn't personnel security under Human Resources Strategy?

Personnel Security is not part of Human Resources Strategy because Security is defined as activities related to the protection of an organization's personnel, assets, and facilities. Human Resources Strategy is about activities related to developing the human capital of an agency. Personnel Security relates to protecting agencies' personnel, assets and facilities rather than developing human capital.

2. Will this new General Employee Management schedule address and clarify ownership and responsibilities between OPM and other agencies with respect to records in the eOPF system?

While OPM has provided guidance on this matter, we understand that agencies are still uncertain about how to manage OPF/eOPF records. We will work with OPM to try to bring clarity to these records in the GRS.

3. Why is Human Resources Strategy separate from Planning?

Agency Planning may contain high-level strategic human resources planning. Human Resources Strategy more likely concerns lower level activities related to developing human capital within an agency. Many other activities beyond strategic planning are conducted in Human Resources offices that do not fall under other sections of Human Resources Management. These activities can be addressed in Human Resources Strategy.

4. Will Information System Security include continuity of operations activities (COOP)?

Continuity of operations records related to electronic systems are already covered in GRS 24, which is mapped to Information System Security. COOP records may also fall under Emergency Planning. This issue will be resolved as we create these schedules.

11 Appendix D - Summary of Changes

The GRS Team made some substantial revisions to the plan for the new GRS based on comments received during the focus group sessions. The following describes the significant changes between the original proposal and the current plan.

6 The Plan for Revising the GRS: We have expanded this section to better explain why we have organized the new structure the way we have, how we plan to go about the revision process, and to clarify that the defined structure is just an outline for how the GRS will be organized. We have also merged this section with the previous proposed structure section from the original proposal and provided only the top-level functions in the outline for this section. More detailed information about the plans for organizing the GRS can be found in Appendix A.

7 Project Timeline: The project timeline has been updated to reflect changes to the high-level sections (described in more detail below). The only significant change is that Human Resources Management and Temporary, Commissions, Boards Council and Committees have been moved to FY14 and General Operations Support (formerly Administrative Management) and Executive Leadership have moved to FY15 (basically, we have swapped the sections originally planned for FY14 and FY15). In the original plan, we had proposed Administrative Management for FY14 because it included Goods & Services Acquisition. Goods & Services Acquisition will contain existing GRS authorities that do not meet current audit requirements, so that seemed to be a greater need. We have moved Goods & Services Acquisition into the Finance Management section, however, so it will be addressed in FY13. Due to this change, it was no longer necessary to address General Operations Support prior to Human Resources Management.

8 Appendix A - Structure of the New GRS:

- We have reformatted this section into a table format.
- The overall organization of this section has changed to reflect the Team's decision to organize the sections as either Administrative Support Functions or Mission Support Functions. Administrative Support Functions has been reorganized to list the larger functional areas first (e.g. Finance Management, Human Resources Management) followed by the General Operations Support function which includes the remaining stand-alone sub-functions. Mission Support Functions are organized with the sections that tend to relate to specific offices first (e.g. Executive Leadership, Public Affairs) followed by more functional areas (e.g. Planning & Budget, Policy & Regulation), with Temporary Commissions, Boards, Councils and Committees at the end.
- Additional record series have been added under "Records that may be included" to many of the sub-functions based on suggestions received from agencies in response to the original proposal.
- **1. Finance Management:** The title has been changed to reflect that this section is about management of agency finances. Budget has been combined with Planning because 1) it is a higher-level function related to agency planning, and 2) because when NARA attempted to schedule CFO records in the past the schedule was withdrawn due to controversy. The GRS

Team decided it was better to put off dealing with budget and CFO records later in our update process.

- **1.1 Goods & Services Acquisition:** This sub-section has been moved from General Operations Support (formerly Administrative Management) to Finance Management because it is directly related to agency finance. Goods & Services Acquisition may overlap with Payments, so it was important that both these sub-functions be addressed at the same time. We have also tried to clarify that Goods & Services Acquisition includes management of contracts.
- **2.3 General Employee Management:** We revised General Employee Management to include activities and existing GRS items previously associated with Employee Relations. The Team determined that Employee Relations was not well defined and that activities related to employee performance were part of the general management of employees and appropriate for inclusion in this section. We also made this revision because of confusion about Employee Relations versus Labor Relations. We wanted to make it clear that Labor Relations is specific to activities related to agencies interacting with their employee labor unions and not labor union involvement in activities and programs related to individual employees. We also added GRS 1, item 2, Service Cards to this sub-function to accommodate any agencies that are still using an equivalent to the SF-7.
- **2.4 Employee Compensation & Benefits:** We added “Employee” to the title of this section based on an agency suggestion.
- **2.5 Employee Separation Management:** We added “Employee” to the title of this section based on an agency suggestion. We also made minor edits to the description based on a suggestion from an agency.
- **2.6 Employee Training:** We revised the description to include professional development activities other than just training.
- **3. Technology Management and 4. Information Management:** We separated the original section titled Information & Technology Management because there was confusion that we meant Information Technology Management and discussion about whether information, specifically Records & Information Management, should be included with technology. While the GRS Team ultimately agrees that the technology and information management should not be separated, for the purposes of clarity in the GRS we have divided this function into two. System Development, IT Infrastructure & System Maintenance and Information Systems Security are part of Technology Management. IT Help Desk Services has been removed as this sub-function has been merged with Administrative Help Desk services. Records & Information Management and Records Related to Electronic Systems are part of Information Management. Please note that Records Related to Electronic Systems is in Information Management because a large part of that schedule will address applying existing records schedules to electronic systems. It is possible that this sub-function will undergo considerable additional revisions as it goes through the update process.
- **4.1 Records & Information Management:** We removed Information Sharing from the list of records/activities that may be included. We think that information sharing activities are more likely to involve records that may relate to a more specific function and that there may not be actual records associated with information sharing activities themselves. This will

be further analyzed as we develop schedules, but for the time being has been removed because of lack of clarity.

- **5. General Operations Support:** This function was previously Administrative Management. We have changed the title based on a comment that all activities under what we have categorized as Administrative Support Function are administrative management. The new title reflects that these are functions related to supporting the operations of an agency. This section includes sub-functions that do not require further sub-divisions.
- **5.1 General Administration:** We have removed existing GRS items for correspondence that related to Mission Support Functions. Our intent is to create a bucket item in General Administrative for administrative correspondence. If we find during scheduling that the administrative correspondence items need to be part of their related functions rather than a single bucket item, we will address the issue at that time.
- **5.3 Travel & Transportation:** We have removed Travel from Finance Management because it is more than just payment/reimbursement. We have combined it with transportation, which did not appear as a separate function in the original proposal. As these activities related to what was previously termed Logistics Management, we have changed the title of that section to Travel & Transportation to use terms that are better understood.
- **5.5 Mail and Telecommunication Services:** We have changed the title from Communications to better reflect that this sub-function does not include actual communications themselves but activities related to managing mail and telecommunication services within in an agency.
- **5.6 Security:** We have removed investigations from the list of records that may be included in this section as many people found it confusing. Investigations were a series agencies suggested to include via the survey we conducted. There was no further information provided elaborating on what was meant by investigations.
- **5.8 Management Controls & Oversight:** In the title we have replaced “Administrative” with “Management” based on a suggested from an agency. The Team agreed that this change better reflected the purpose of this section. We have also moved GRS 16, item 6, and GRS 13, items 5a and 5b, to this sub-function after determining that these records are related to official reporting. We also made minor revisions to the description based on suggestions from an agency.
- **5.9 Internal Help Desk Services:** IT Help Desk Services has been moved from toe old Information & Technology Management section and merged with Administrative Help Desk Services. We made this change because it made more sense to combine all internal help desks services under the same sub-function.
- **6. Executive Leadership:** We have moved GRS 27, items 5 and 6, to this section as they are records of the Chief Information Officer.
- **7.1 Official Information:** The description of this sub-function has been revised to focus on official information creation rather than official information dissemination. Our intent was to create a sub-function that would cover activities and records related to the creation of official information about the agency, such as photographs, publications and brochures, and records created by agency history offices. There is still some potential for confusion

between this sub-function and 7.2 External Relations which relates to the dissemination of information and management of external relationships. It is possible that further revisions to these to sections, including possibly merging them, will occur when we draft the schedules.

- **7.2 External Relations:** This sub-function has been added as a revision to the previous Public Relations/Customer Service sub-function. Our intent was to include a sub-function to specifically include activities related to managing an agency's relationships with external stakeholders. We decided that information dissemination was part of managing those relationships, which is why that activity is included here and not under 7.1 Official Information. As noted above, further changes may occur to this sub-function and 7.1 as we proceed with scheduling.
- **7.3 Customer Service:** This sub-function was revised to replace the previous Public Relations/Customer Service sub-function. We believed that it was important to have a sub-function specifically for activities related to customer service. While there is potential overlap between this sub-function and 7.2, we will further clarify the sub-functions during scheduling.
- **8. Legal Support:** We have changed the title of this section from General Counsel to Legal Support to reflect that this section may not include all activities performed by agency General Counsel. Some activities may be more administrative in nature and found under various sections in the Administrative Support Functions. This section is intended to cover activities specifically related to legal support for the agency and its mission.
- **9.3 Congressional Testimony:** We have changed the title from Legislative Testimony to Congressional Testimony upon suggestions from agencies so as to be more inclusive.
- **10. Planning & Budget and 11. Policy & Regulation:** We have separated these two sections, previously titled Planning & Policy, because they are two very separate functions. We also made the change because we have moved budget from Finance Management because it is an activity performed at high-levels within the agency and because of potential issues with creating the schedule.
- **11.1 Policy & Guidance Development:** We have noted that this not only includes records related to development but the final product as well.
- **10.3 Budgeting:** Despite agency comments that Budgeting should remain part of Finance Management, we have determined that it is better placed with Planning as it is a high-level function within an agency that often directly relates to agency planning. Neither is it really an administrative function. High-level agency budget formulation is more in line with mission support than administrative support. Also, budget records generally fall under the purview of the Chief Financial Officer (CFO), who is a high-level official. We have previously had difficulty in getting approval for a GRS to cover CFO records, so we would like to delay working on this schedule until later in the update process.
- **13. Research & Development:** Research & Development was part of a section entitled Knowledge Creation and Dissemination in the original draft. The Team decided that there was too much potential overlap and general confusion between Knowledge Dissemination and Official Information Dissemination, so we have essentially taken out all references to Knowledge Creation and Dissemination, leaving on the core function of Research &

Development. This sub-function has also incorporated another sub-function previously included under Knowledge Creation and Dissemination: General Purpose Data and Statistics). We determined that creation and publication of general purpose data and statistics was logically an activity under Research & Development and did not need to be included as a separate sub-function.

9 Appendix B - Focus Group Issues and Suggestion: We have added this appendix to acknowledge comments and suggestions received in response to our original proposal.

10 Appendix C - Questions & Answers from the GRS Restructuring Project Focus Group Sessions: We have added this section in response to requests to provide the questions and answers from all of the focus group sessions.