NATIONAL ARCHIVES

OFFICE *of the* CHIEF RECORDS OFFICER

Scheduling Records in Electronic Systems

Records Scheduling Guide 9

National Archives and Records Administration
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About This Guide

This guide is for agency records managers and NARA appraisal archivists. Use it when scheduling and appraising records in electronic systems. Use of this guide is not required. Always consult NARA's appraisal criteria when proposing the disposition of records.

What Are Electronic Systems Records?

An electronic system or information system automates access to, and management of, information and records. These systems are made up of computer hardware, software, and networked components. Electronic systems may or may not contain records.

Computer hardware and networks **are not** records. They are property, so they do not need a records schedule.

Software, code, and computer applications can be records. If federal agencies create or have someone else create for them software, code or computer applications, it is a federal record.

If your agency contracts for the development of software, you should work closely with your information technology office and acquisitions office to determine what code is delivered to the government and what rights the government is acquiring. Contractor generated code may be a federal record.

Electronic systems can contain a variety of different record types. They may include any type of born-digital format, digitized records, or structured data, including databases. For more information about the types of digital file formats that could exist in an electronic system, see Appendix A: Table of Formats. Electronic systems also typically include metadata. For more information about metadata, see NARA Bulletin 2015-04: Metadata Guidance for the Transfer of Permanent Electronic Records and NARA Bulletin 2025-01: Metadata Guidance for the Transfer of Classified Electronic Records.

Considerations When Scheduling Records in Electronic Systems

When scheduling records in electronic systems, it is important to identify the information that the system uses and contains. Ask these questions to determine what types of records you may need to schedule. See *Scheduling Elements of Electronic Systems* below for additional information.

- **What information is kept in the system?** This is the system content.

- **Where does the information come from? How does it get into the system?** These are the system input records.
- **What information is exported from the system and how?** These are the system outputs.
- **Does the system contain information about users, such as user profiles? Does it contain information about who accesses the system and when?** These are user profiles and access logs.
- **How is information in the system accessed? Is there some sort of user interface?** A system might have a web interface. If the web interface includes unique information or indicates how users interacted with the system, NARA may want the agency to capture the interface as part of the system records (although this is rare).
- **Does the system contain any special code? Is it an application specifically developed by or for your agency?** Software, programs, programming code, and algorithms can be federal records if your agency or a contractor created them.
- **What documentation exists about the system?** System documentation includes user guides, record layouts, data dictionaries, schemas, and other similar types of records that describe the system and how it may be used.

Agency records management should work with the information system manager and the information technology manager to schedule and otherwise manage electronic records. The information system manager, also called the program manager, oversees the creation and use of records in an information system. The information technology manager oversees the purchase and technical operation of an information system.

Records in electronic information systems maintained for the agency by contractors must be scheduled as the agency's records. The contract should clearly state the government's ownership of all records necessary for the adequate and proper documentation of contractor-operated agency activities and programs, and the requirement to deliver such records to the government. (See 36 CFR 1222.32.)

Sources of Information for Electronic Systems

The following agency offices and officials can assist agency records management in identifying electronic systems and the records they contain:

- **Office of the Chief Information Officer (CIO).** Agency CIO and information technology (IT) staff routinely develop and maintain inventories of electronic information systems to comply with the Federal Information Security Management Act (FISMA). CIO offices also create and maintain Office of

Management Budget (OMB) Exhibit 300 inventories that list agency information systems. It is important to note, however, that many of these systems do not contain records.

- **Office of the General Counsel (OGC).** In many agencies, OGC is developing inventories of electronically stored information (ESI) to support e-Discovery efforts.

- **Privacy Act and Freedom of Information Act (FOIA) Offices.** Privacy and FOIA offices publish two documents that can help identify and describe an agency's electronic systems.
    - **Privacy Act System of Records Notices (SORNs).** Agencies publish these notices in the Federal Register. They describe electronic systems that are Systems of Records. A System of Records is any group of records under agency control from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifier assigned to the individual.
    - **Privacy Impact Assessments (PIAs).** These assessments analyze how personally identifiable information is collected, used, shared, and maintained. PIAs allow agencies to communicate with the public about how they handle information, including how they address privacy concerns and safeguard information.

Scheduling Types of Records in Electronic Systems

The following types of information, or records, can exist for any given electronic system. As noted below, many system records are covered by General Records Schedules. See the GRS website for more information on those items. Identify all records associated with the system to determine if they need to be scheduled or are covered by the GRS.

It is not necessary to describe each of these record types that may exist for a system as individual items on a schedule. If the records do need to be scheduled, they can be grouped by type, if appropriate. So, for example, if there are multiple output records not covered by the GRS, it may be possible, depending on their disposition and retention, to schedule all outputs as a single item.

Inputs. These are the sources of information in a system. Sometimes the only input is information that moves directly from one system to another without any intermediary record involved. In these cases, there may be no input record. Other forms of inputs include:

- **Information is manually entered into the system:** In this case there may be no input record to schedule, unless data is manually entered from a form. See below for disposition of forms used for data entry.

- **Data from other systems:** Often two systems will simply talk to each other or sync data electronically. In this scenario, there is no input record. If a file or files move information from one system to another, that file is a record that requires disposition authority. Use GRS 5.2, item 020, Intermediary Records.

- **Forms:** Apply GRS 5.2, item 020. Data manually entered from a paper form or data extracted from a digitized or born-digital form are intermediary records.

- **Source records:** These are records from which a digitized version or digitized record is created. See GRS 4.5, item 010. Note that the item has many exclusions. The GRS only covers source records digitized to NARA standards; created on or after January 1, 1950; and that do not have intrinsic value. Any source record that the GRS excludes must be scheduled on an agency-specific schedule

System content. This is the information the system contains. It is also sometimes referred to as the “master file.” System content can be data or other digital files such as PDFs. **It can also include metadata.** GRS 3.1, items 050 and 051 cover system metadata. Metadata for permanent systems is permanent and must be transferred to NARA with the related system records. System content usually requires an agency-specific schedule, unless it is something like payroll system data, that is covered by a GRS.

- Schedule system content at the file or dataset level.
- System content can be a single file or dataset or multiple files or datasets. Identify the different types of files or datasets in the system and assess retention needs for each. It is possible to schedule different files or datasets in the same system using different disposition authorities, provided the datasets/files can be extracted individually.

System content, or data, can be permanent. Examples of potentially permanent electronic records include but are not limited to:

- Digitized versions of records previously scheduled as permanent
- Automated indexes to permanent records
- Management data having government-wide coverage or significance
- Socioeconomic data on topics such as trade, education, health, or behavior
- Natural resources data related to land, water, minerals, or wildlife

- Data documenting military or civilian operations during times of war, civil emergency, or natural disaster
- Political or judicial data related to such topics as elections, special investigations, or court proceedings
- Digital cartographic data used to map the earth's surface and atmosphere, other planets, and planetary satellites
- Digital architectural and engineering data used to plan and construct selected buildings or other structures, complete major public works projects, and produce significant weapons and machines
- National security and international relations data documenting such activities as strategic or foreign policy assessments, intelligence collection, foreign public opinion, or international negotiations.

See also Guide 5: Scheduling Personal Data and Guide 6: Scheduling Research & Development Records for more information on scheduling certain types of data, including observational and experimental scientific data.

Outputs. These are the products of an information system. System output records can include:

- **Queries and ad hoc reports:** Queries and ad hoc reports are generated by the information system. Agencies only need these types of records for a short period of time. They are generally not required to meet legal or fiscal obligations, or to initiate, sustain, evaluate, or provide evidence of decision-making. Therefore, they qualify as transitory records covered by GRS 5.2, item 010. If these types of records are used to create a subsequent record, such as data from a system used to create a formal report the ad hoc report is an intermediary record, covered by GRS 5.2, item 020. Reports that include information generated by a system are not outputs. These are records separate from the system.

- **Reports:** Most system reports will be ad hoc or used to create a subsequent report. If the output is a more formal report used to meet legal or fiscal obligations, or to initiate, sustain, evaluate, or provide evidence of decision-making, schedule the output on an agency-specific schedule. Their value will depend on their content, purpose, and use. Reports that include information generated by a system are not outputs. These are records separate from the system.

- **Public Access Files:** These outputs are specifically excluded in GRS 5.2, item 010, so they must be scheduled on agency-specific record schedules.

- **Data extracts that are significantly different from the system content:** These outputs are specifically excluded in GRS 5.2, item 010, so they must be scheduled on agency-specific record schedules. This includes public use files and other data files that have a different purpose or use from the source system.

Documentation. Documentation often explains how the system works, how it is used, and what information in the system means, such as codes. System documentation is critical for understanding the information in the system. Your agency should maintain the system documentation for the life of the system. See GRS 3.1, items 050 and 051 for disposition of system documentation. Common types of system documentation include:

- User guides or manuals
- System specifications
- Code books or data dictionaries
- Record layouts, schemas, or Document Type Definitions (DTDs)

System access records. These include user profiles, password files, and usage logs. These records are covered by GRS 3.2, item 030, for systems not requiring special access and item 031 for systems that do require special access. It is up to an agency to determine if a system requires special access or not. In most cases, item 030 is appropriate.

System development records. GRS 3.1, item 011 covers these records.

Software, programs, applications or code.

- **Off-the-shelf or "COTS" products:** These types of programs, such as Microsoft Office, are not records. Do not include them on schedules. Consult your NARA appraiser about off-the-shelf software that has been customized specifically for your agency. Such software might be a record.
- **Anything specifically developed by or for the agency:** GRS 3.1, item 012, covers these records if they relate to records scheduled as temporary. If they relate to permanent records, unscheduled records, or do not contain records at all, describe them on an agency-specific schedule.

Website interface. This refers to the website where users access an electronic system. Frequently, the web interface will not contain any unique information and can be considered part of the application (see *Software, programs, applications or code* below). If the website interface includes unique information, disposition depends on the nature of the information. Frequently these web interfaces can be managed as part of the overall system.

Retention Guidelines

Transfer of permanent records

NARA typically approves records for transfer to NARA between 15 and 30 years after creation or active use. For longer or shorter transfer periods, see NARA Bulletin 2020-02: Guidance on Scheduling the Early and Late Transfer of Permanent Records.

Electronic systems can present a unique challenge for transfer when the systems remain active for decades and are constantly being updated or added to. In these cases, NARA may decide that the agency should transfer a periodic snapshot of the data. An example of a transfer instruction for a snapshot of a system's data would be "Transfer a snapshot of the data every 5 years." In this case, the agency would transfer a copy of what the data looks like every 5 years. These snapshots are cumulative and show what the data looks like at a specific moment in time.

Retention of temporary records

Agencies should base the retention of temporary records on the agency's administrative, fiscal and legal needs for the records. For electronic systems, agencies may choose to purge data or records periodically or destroy all information in the system at one time when the system is no longer in use.

For example, all of the data in a system may be in active use until that system is decommissioned. The disposition instruction might be "Destroy 1 year after system is decommissioned" or "Destroy when all data is migrated to the successor system." Alternatively, a disposition instruction to destroy records periodically might be more appropriate for individual records that have a closeout date or that record the date the record is last modified. A disposition for these records might be "Destroy individual records 7 years after date closed" or "Destroy individual records 10 years after last date modified."

Related NARA Resources

Code of Federal Regulations:

- 36 CFR Chapter XII, Part 1235 (Transfer of Records to the National Archives of the United States)
- 36 CFR Chapter XII, Part 1236 (Electronic Records Management)

Strategic Directions: Appraisal Policy (excerpted from NARA Directive 1441)

NARA Transfer Guidance for Permanent Electronic Records

Appendix A: Table of Formats

NARA Bulletin 2015-04: Metadata Guidance for the Transfer of Permanent Electronic Records

NARA Bulletin 2025-01: Metadata Guidance for the Transfer of Classified Electronic Records