NATIONAL ARCHIVES

Checklist to Support Agencies Undergoing Reorganizations or Other Major Changes

Records must be secured and preserved, and may only be disposed of in accordance with a NARA-approved records schedule, as required by the Federal Records Act ("FRA") ([44 U.S.C. Chapter 31](#) and [36 CFR § 1231](#)).

Agencies' record keeping obligations continue, even as they discontinue some or most of their functions. As long as any portion of your federal entity is still in operation, that entity is legally responsible for its records. Agencies must assign responsibility for ongoing access, maintenance, and safeguarding of their records to a person who can perform these functions. NARA has prepared this checklist to help federal entities prepare for large-scale changes.

Identify Key Stakeholders: Properly managing records is complex and requires a comprehensive effort. Roles that should be included are:

- **[Records Officer](#)** (or official responsible for records management): Project lead
- **Legal/General Counsel**: Coordinate legal transfer, holds, and safeguarding of records
- **Office of Security:** Coordinate classified records handling and potential declassification requirements
- **[Senior Agency Official for Records Management](#):** Senior leadership to secure resources
- **IT and Data Staff:** Identify and provide access to electronic systems
- **Contract Management Staff:** Ensure ongoing access to electronic records in systems and cloud storage

Big Picture Priorities:
- Understand and categorize the impact to the affected organization: i.e., function is scaling back, devolving to another organization, or ceasing
- Identify and establish contact with impacted program offices
- Identify systems and records that support the program offices and functions
- Identify contracts and ensure funding to support access to systems and records (e.g., M365, AWS contracts, commercial storage)
- Develop a plan to safeguard records and share with NARA at rm.communications@nara.gov

NOTE: Classified records have special handling and storage requirements that must be maintained at all times. Please coordinate with your security office to ensure proper handling.

Get Organized:
- Compile a list or "quick reference sheet" of your records categories with their associated retention periods listed in the records schedules.
- Create an [inventory of your records](#). Be sure to examine:
  - File shares, cloud storage, systems, removable media
  - Physical file rooms, desks of staff

- Note date ranges of files.
- Note electronic or physical volume for all files.
- Note file types for electronic records.
- Assign a records schedule item to each grouping of records, or note if unscheduled.
- Identify all classified holdings and confirm current classification levels.

Triage Actions:
- Determine if records can securely remain where they are currently stored.
    - If so, maintain and monitor.
    - If not:
        - Move digital records to sustainable and accessible electronic storage.
        - Pack physical records in FRC boxes and move to a secure location.
- Determine if records for scaled back, devolved, or ceased functions should be transferred to another federal entity.
- Determine if records can be destroyed or transferred (Follow sections below).

Locate Retention Requirements in the Records Schedules:
- [Agency Records Control Schedules](): Determine the types of records you have and identify applicable retention periods for the records.
- [General Records Schedules (GRS)](): Determine the types of records you have and applicable retention periods for records common to government offices (e.g., HR, financial, and administrative).
    - [GRS 5.2]() provides disposition authority for transitory and intermediary records. (Please see the [FAQ on Transitory and Intermediary Records]()).
    - [GRS 6.1]() provides the retention periods for emails and other types of electronic messages, for Capstone and/or non-Capstone officials. Identify your agency's GRS 6.1 implementation form, and ensure that you retain electronic messages in accordance with your agency's elections.
- Agency records management manuals and comprehensive file plans: Many agencies already have lists of their records, compiling their Agency Schedules and the GRS.
- Nonrecords: Documents not associated with agency business, copies used only for reference, and personal materials that relate solely to the individual's personal affairs, are not federal records. For additional information please see [Identification of Records, Nonrecord Materials, and Personal Papers]().
- Websites can be records. Locate retention requirements in the records schedules above and proceed accordingly. For additional information see [NARA Guidance on Managing Web Records]().
- Unscheduled records must be retained as permanent records until scheduled.

Classified, Legal, and Access Considerations:
There are considerations in addition to disposition timeframes in the records schedules that must also be addressed:
- Legal holds must continue - records may not be destroyed.
- Records under legal hold must remain accessible.

> - Proper handling and control of classified and sensitive information must continue.

For Records Remaining with Original Federal Entity:
- Designate staff responsible for records management.
- Designate staff responsible for ongoing information requests, including FOIA, legal, and Congressional obligations.
- Dispose of temporary records eligible for destruction under a NARA-approved disposition authority.
- Document records disposal actions for accountability and audit purposes.

For Records being Transferred to Another Federal Entity:
- Request authority from NARA, as necessary, to transfer records between federal entities by contacting NARA at rm.communications@nara.gov. (36 CFR §1231.12 describes what the request must include).
- Transfer records to another agency assuming the related functions.
- Document actions taken for transfer of records for accountability and audit purposes.

For Records being Transferred to Inactive Storage:
- For temporary scheduled records, ensure proper documentation of transfer as outlined in 36 CFR §1232.16.
- For unscheduled and permanent records, request authority from NARA to transfer to a records storage facility by contacting NARA at rm.communications@nara.gov. (36 CFR §1232.14 and §1232.16 describes what the request must include).

For Records being Transferred to NARA:
- Begin the transfer process to NARA, via ERA, for immediate transfer of eligible permanent records under a NARA-approved disposition authority. See NARA's Accessioning Guidance and the ERA page for additional information about the system.
- Identify appropriate access restrictions and coordinate with NARA's Special Access and FOIA Program specialaccess_foia@nara.gov.
- Initiate declassification review for records older than the required classification period, unless exempt.
- Submit an exception request per M-23-07 to transfer permanent records ready for accessioning to the Archives or to transfer temporary and permanent records not ready for accessioning to the FRCP.
- Create folder title lists (analog) or metadata (electronic) for all permanent transfers. See Finding Aid Requirements.
- Complete Transfer Requests in ERA for permanent records ready for immediate transfer to NARA. See ERA page for additional information about the system.
- Complete and retain documentation for records transfers to NARA.

If your organization is unable to complete records transfer tasks based on extenuating circumstances, please contact the appropriate NARA appraisal archivist to determine next steps in consultation with NARA.