

Agency Review Package

Additions to Financial Management and Reporting Records (GRS 1.1)

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National Archives and Records Administration
Office of the Chief Records Officer
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Addition to GENERAL RECORDS SCHEDULE 1.1: Financial Management and Reporting Records

This schedule adds two items to GRS 1.1 covering records of applications for government credit cards.

Item	Records Description		Disposition Instruction	Disposition Authority
090	<p>Government purchase card and travel credit card application and approval records. Applications by employees for government credit cards issued in card-holder's name, whether for official travel expenses or for purchasing goods and services.</p>	<p>Records required for as long as the card is active. May include:</p> <ul style="list-style-type: none"> • application for credit card • cardholder agreement • acknowledgement of responsibilities and penalties for misuse • approving official agreement • certificate of appointment (warrant) • card training certificate 	<p>Temporary. Destroy upon card holder separation or when card is returned to office and destroyed, as appropriate, but longer retention is authorized if required for business use.</p>	<p>DAA-GRS-2018-0003-0001</p>
091		<p>Records documenting applicant's credit rating. May include:</p> <ul style="list-style-type: none"> • credit release form • applicant credit report 	<p>Temporary. Destroy 1 year after card issuance or when no longer needed for business, whichever is earlier.</p>	<p>DAA-GRS-2018-0003-0002</p>



NATIONAL ARCHIVES

Date: May 24, 2018
Appraiser: Galen R. Wilson, ACRS
Agency: General Records Schedules (GRS)
Subject: Addition to GRS 1.1 (DAA-GRS-2018-000X)

INTRODUCTION

Schedule Overview

Additions to GRS 1.1 (Financial Management and Reporting Records): Government purchase card and travel credit card application records.

Overall Recommendation

I recommend approval of this schedule.

APPRAISAL

Item 0001 (090): Government purchase card and travel credit card application records: Records required for as long as the card is active.

This item was suggested for GRS inclusion by an agency. When I researched the idea for feasibility, I was surprised to find that (a) these records were not already covered by a GRS item, (b) only a dozen or so agencies have scheduled the records independently,¹ and (c) when agencies *have* scheduled them, appraisers sometimes stated that the records were already covered by GRS 6, item 1.² Indeed, the agency suggestion originated with asking whether GRS 1.1, item 011, could cover these records. So the first thing this appraisal must do is explain why GRS 1.1, items 010 and 011 (and their predecessor GRS 6, item 1) are not good authorities for credit card application records.

GRS 1.1, item 010, retains records of financial transactions for 6 years to document an office's financial integrity and enable investigation should allegation of misconduct surface before the statute of limitations runs out. It fails to provide adequate coverage for records of credit card applications, because a flat number of years' retention is inappropriate when staff may hold purchase or travel cards for potentially decades. GRS 1.1, item 011, covers additional copies retained for administrative use, disposable when business use ceases. Applying this item to

¹ Some agencies have scheduled credit cards themselves, but not the records of applications for them. See, for instance, N1-406-09-17, item 12.

² For example, N1-362-94-1, item 4.

these records implies that users must instinctively recognize that “business use” is as long as the card remains valid. A better solution is an item whose retention is tied to card activation, and the GRS is the obvious place for it since some staff in every agency hold government credit cards. Most agencies noted below have scheduled these records for a retention period calculated from record creation. These agencies should take note that they risk destroying active records.

The original agency request mentioned above was for an item covering government travel cards. Research led to the conclusion that a more useful item would cover purchase cards as well. Initial resistance to this idea came from subject area experts on the grounds that these two cards are administered under different programs with differing rules and requirements. But they came to see that the records created and collected for both types of cards serve a common business function and that a unified item could be effectively applied to records created for either.

Proposed Disposition

Temporary

Appropriateness of Proposed Disposition

Appropriate

Appraisal Justification

*Previously approved as temporary:

NC1-47-81-10, item 1 (*immediate*)

N1-57-08-2, item 703-15 (*2 years*)

N1-64-08-13, item 1 (*3 years*)

N1-65-07-7, item 319F (*7 years—item for credit card program management*)

N1-137-96-2, item 09B003 (*3 years*)

N1-170-94-1, item 401-27a (*6 years, 3 months*)

N1-241-96-7, item 5 (*2 years*)

N1-255-94-2, item 20c (*upon receipt of superseding card*)

N1-373-02-2, item 3a (*6 years, 3 months*)

N1-387-09-1, item 120 (*7 years—item for credit card program management*)

N1-463-98-1, item 1 (*2 years*)

N1-473-12-1, item 1D (*7 years—bucket item for procurement services*)

N1-589-12-1, item 1D (*7 years—bucket item for procurement services*)

*Has little or no research value. No agency has ever scheduled these records as permanent. If records of purchases made with government credit cards are temporary (GRS 1.1, item 010), records documenting the right of the card holder to make those purchases are also temporary.

Adequacy of Proposed Retention Period

Adequate from the standpoint of legal rights and accountability. Retention instructions are necessarily flexible, tied to a future action whose date can never be precisely predicted. That action may be the return of a card from a departing employee, the return of a card from an employee who remains on staff, or receipt of the information that an employee is no longer with the agency. Depending on when these actions take place, records may be destroyed within a few months of creation or survive for decades. Immediate destruction

upon the pivotal action taking place is justified as the records' only purpose is to document a card's authority while it is in active use.

Media Neutrality

Approved

Item 0002 (091): Government purchase card and travel credit card application records: Records documenting applicant's credit rating.

This item culls certain records from the dossier documenting the right of an employee to hold a government credit or purchase card. These records are not government records at all, but rather personal records provided the government for a specific business purpose.

Proposed Disposition

Temporary

Appropriateness of Proposed Disposition

Appropriate

Appraisal Justification

*Has little or no research value. These records reflect a snapshot of an employee's credit rating germane to the issuance of a purchase or credit card. Such a snapshot has immediate business value but lacks long-term value.

Adequacy of Proposed Retention Period

Adequate from the standpoint of legal rights and accountability. Credit ratings fluctuate, which means information may fairly quickly no longer reflect reality. But above all, these are personal documents voluntarily provided the government for a specific business use, and the government should not retain them beyond that business use.

Media Neutrality

Approved



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