

Agency Review Package

Additions to Employee Acquisition Records (GRS 2.1)

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National Archives and Records Administration
Office of the Chief Records Officer
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[Additions to] GENERAL RECORDS SCHEDULE 2.1: Employee Acquisition Records

Item	Records Description	Disposition Instruction	Disposition Authority	
010-- 160	[No change]			
170	<p>Adverse impact files. Records documenting the impact of tests and other selection procedures on the employment opportunities of persons by sex, race, and ethnic group in order to determine compliance with the Uniform Guidelines on Employee Selection Procedures. Includes records documenting:</p>	<p>Records revealing no adverse impact.</p>	<p>Temporary. Destroy when 3 years old, but longer retention is authorized if required for business use.</p>	<p>DAA-GRS-2018-000x-0001</p>
171	<ul style="list-style-type: none"> • numbers of applicants by sex, race, and national origin • numbers of persons hired, promoted, and terminated, by sex, race, and national origin • selection procedures and their validity 	<p>Records revealing an adverse impact. Legal citation: 29 CFR 1607.15A(2)(b)</p>	<p>Temporary. Destroy 2 years after elimination of adverse impact, but longer retention is authorized if required for business use.</p>	<p>DAA-GRS-2018-000x-0002</p>
180	<p>Recruitment records. Records documenting agency recruitment efforts at career fairs, job fairs, visits to colleges, and similar venues. Includes:</p> <ul style="list-style-type: none"> • records documenting planning and logistics of individual recruitment events • record copy of advertisement and materials for distribution • contact information and interest areas collected from potential future job candidates • recruitment event reports <p>Exclusion: Military recruitment advertising records; military establishments must schedule these.</p>	<p>Temporary. Destroy when 1 year old, but longer retention is authorized if required for business use.</p>	<p>DAA-GRS-2018-000x-0003</p>	



NATIONAL ARCHIVES

Date: May 8, 2018
Appraiser: Galen R. Wilson, ACRS
Agency: General Records Schedules (GRS)
Subject: DAA-GRS-2018-000x

INTRODUCTION

Schedule Overview

Additions to GRS 2.1: Employee Acquisition Records

Additional Background Information

This schedule adds three items to GRS 2.1, covering adverse impact files and records of employee recruitment.

Overall Recommendation

I recommend approval of this schedule.

APPRAISAL

Item 0001 (GRS 2.1, item 170): Adverse impact files: Records revealing no adverse impact.

Item 0002 (GRS 2.1, item 171): Adverse impact files: Records revealing an adverse impact.

These items cover statistical records created and compiled in human resources offices that can collectively reveal whether agency tests and other selection procedures discriminate against applicants on the basis of race, gender, or ethnicity. These records exist only to show whether racial, gender, or ethnic bias has in any way entered the selection process. Requirements for the work process that creates these records is found in 29 CFR 1607.4 and following.

A search for the phrase “adverse impact” in NARA’s library of agency schedules produced only 60 hits. The vast majority concerned adverse impact of Federal actions on the environment, with adverse economic impact running a distant second. Only one Federal entity—Department of Health and Human Services, 1983—has ever submitted a schedule specifically for records covered by these proposed items. Yet the CFR requires all agencies to create them.

Proposed Disposition

Temporary

Appropriateness of Proposed Disposition

Appropriate

Appraisal Justification

* Has little or no research value. These are purely administrative records, primarily just

statistics.

*Previously approved as temporary:

NC1-235-83-1, item 3 (5 years)

Adequacy of Proposed Retention Period

Adequate from the standpoint of legal rights and accountability. Two-year retention of item 0002 (171) is specified in 29 CFR 1607.15A(2)(b). On first glance, it might seem that records revealing no adverse impact (3 years) are kept longer than those which reveal such an impact (2 years). But item 0002 (171) retains records for the entire length of time an adverse impact exists, plus 2 years of “clean” time after that impact is resolved. This amounts to a longer total retention from the date of records’ creation. Three-year retention for item 0001 (170) is in keeping with the standard retention for low-profile administrative records across Government.

Media Neutrality

Approved

Item 0003 (GRS 2.1, item 180): Recruitment records.

These records are created when agencies seek out quality applicants at locations where a critical mass of potential employees is expected to exist. This includes colleges, high school career days, job fairs, and similar events. Not all agencies have recruitment programs, but a surprising number do invest effort actively recruiting rather than waiting for applicants with “the right stuff” to materialize independently in response to general job announcements.

Military recruitment advertising materials are excluded from this item. These are permanent at the Navy (DAA-NU-2015-0001, items 0011 and 0012) and doubtless at the other services too. Both Navy and Army have scheduled administrative records of recruitment activities for temporary retention (see below), so this proposed GRS item does not run afoul of the armed services’ own assessment of the value of these records.

Proposed Disposition

Temporary

Appropriateness of Proposed Disposition

Appropriate

Appraisal Justification

*Previously approved as temporary:

N1-59-00-7, item 1 (10 years—recruiting for Foreign Service)

DAA-0490-2016-0004-0002 (6 years—recruiting for Peace Corps volunteers)

DAA-NU-2015-0001-0027 (5 years)

N1-129-01-5 (2 years)

N1-65-09-14, items 11 and 12 (1 year)

NC1-269-81-4, items 18E31, 18E31, and 18E31 (3 years, 2 years)

NI-411-97-1, items 272 and 276 (5 years, 2 years)

*Has little or no research value. These are purely administrative records.

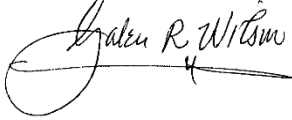
Adequacy of Proposed Retention Period

Adequate from the standpoint of legal rights and accountability. As noted above, some agencies have selected a longer retention than what this item proposes (1 year). This item’s

flexible retention will allow those items—some of which concern very specialized service—to remain in force without their agencies needing to request a GRS exception. The Army submitted DAA-AU-2016-0043, calling for 90-day retention for database contact information of potential recruits, but it was returned without action after its NARA appraiser learned that this GRS was in the planning stages.

Media Neutrality

Approved.

A handwritten signature in black ink that reads "Galen R. Wilson". The signature is written in a cursive style with a long horizontal flourish at the end.

GALEN R. WILSON
Senior Records Analyst

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