GRS 4.5 Digitizing Records

This file contains two documents. The Draft Schedule contains the proposed text of the new GRS in publication format. The Draft Appraisal Memorandum provides additional background explanation and includes the appraiser’s justification for the retention decisions proposed in the schedule.

THE SCHEDULE IS NOT APPROVED FOR USE.

National Archives and Records Administration
Office of the Chief Records Officer
GRS Team
March 22, 2021
GENERAL RECORDS SCHEDULE 4.5: Digitizing Records

This schedule covers records related to digitization projects and original source records that have been digitized. It does not, however, cover the final digitized version of the records.

Exclusions

1. Final digitized versions of records. Agencies must use an appropriate agency-specific schedule or General Records Schedule, as applicable.
2. Input/source records for non-digitized records. GRS 5.2, item 020, covers these records.

<table>
<thead>
<tr>
<th>Item</th>
<th>Records Description</th>
<th>Disposition Instruction</th>
<th>Disposition Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>010</td>
<td><strong>Original Source Records</strong></td>
<td>Temporary. Destroy after confirming that the exclusions and conditions for this disposition authority have been observed. Longer retention is authorized for business use.</td>
<td>DAA-GRS-20XX-000X-0001</td>
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<tr>
<td></td>
<td>Records from which a digitized version or digitized record is created that are:</td>
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<td></td>
<td>● Scheduled as temporary in an approved records schedule; or</td>
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<tr>
<td></td>
<td>● Scheduled as permanent and that were created on or after 1 January 1950 (see Exclusion 3); and are not subject to the exclusions and conditions below.</td>
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</tr>
</tbody>
</table>

Exclusions

The following records are not covered by this authority.

1. Original source records when the digitized versions do not meet the standards established in 36 CFR 1236 Subpart D - Digitizing Temporary Federal Records or Subpart E - Digitizing Permanent Federal Records. These non-compliant digitized records as well as the original source records must be covered by an agency-specific schedule.
2. Formats not covered by 36 CFR 1236 Subpart E - Digitizing Permanent Federal Records. Agencies must use agency-specific schedules for these records:
   ○ Permanent original photographic negatives;
   ○ transparencies;
   ○ aerial film;
   ○ roll film;
   ○ micrographic and radiographic materials that must be digitized using transmissive digitizing techniques; or
Dynamic media, including motion picture and audio visual records.

3. Original source records that were created before 1 January 1950 that have been scheduled as permanent or are unscheduled. Agencies must schedule any unscheduled records. For already scheduled records, agencies need to submit a new schedule if they are proposing to discard the originals. If not, agencies proposing to transfer the originals after December 31, 2022, need to submit a request for an exception to the electronic transfer requirement.

4. Original source records that have intrinsic value in the original medium that would be lost if the content were converted to another medium. Agencies must schedule any unscheduled records. For already scheduled records, agencies proposing to transfer the originals after December 31, 2022, need to submit a request for an exception to the electronic transfer requirement. For a definition of intrinsic value see Appraisal Policy for the National Archives, Appendix 3: Qualities and characteristics of records with intrinsic value (https://www.archives.gov/records-mgmt/scheduling/appraisal#appendix3).

5. Records subject to specific legal or administrative requirements, such as
   a. a statutory requirement to retain the original source record in a specified form;
   b. rights or interests, appeal rights, benefits, national security, litigation holds or similar reasons.

6. Records accessioned into the archival holdings of the National Archives.

Conditions
The following conditions must be met in order to apply this disposition authority.

1. Digitization processes for temporary records must meet the digitizing standards established in 36 CFR 1236 Subpart D.

2. Digitization processes for permanent records must meet the digitizing standards established in 36 CFR 1236 Subpart E.

3. Agencies must consider the risks and may need to seek legal advice before destroying original source records subject to specific legal or administrative requirements, because the records relate to rights and interests, appeal rights, benefits, national security, have been placed under a litigation hold, or are needed for similar reasons. This is especially true for temporary records which are digitized to a lower standard than permanently valuable records. Agencies may apply this authority to original source records subject to a disposal freeze, litigation hold, or retention notice, only after consultation with their counsel.
4. Agencies must ensure that the digitized records have the same degree of authenticity, integrity, reliability and usability as the original source records.
5. Agencies must keep original source records long enough to complete validation of the digitized versions.
6. Agencies must maintain the digitized records in accordance with the National Archives’ standards and guidelines and retain records in accordance with an appropriate agency-specific schedule or General Records Schedule.
7. Agencies must schedule digitized records prior to disposing of any original source records if they are unscheduled.

**Legal citations:** 44 U.S.C. 3302 and 3312, 36 CFR 1236.36(a), 36 CFR 1236.58(e) and (f)

**Supersedes:**
DAA-GRS-2017-0003-0002 (GRS 5.2, item 020)—in part – successful creation of final record

<table>
<thead>
<tr>
<th>020 Digitization Project Records</th>
<th>Records related to digitizing permanent records</th>
<th>Temporary. Destroy when the digitized records using the validation process have been transferred to the National Archives, the National Archives confirms receipt of the records, and legal custody of the records has been accepted by the National Archives. Longer retention is authorized if required for business use.</th>
</tr>
</thead>
</table>
| Records used to manage digitizing projects and document (validate) that the digitized versions of records are of suitable quality to replace original source records. Includes, but is not limited to:  
  - project plans  
  - standards and procedures records used to document that the agency has met validation process requirements, such as:  
    - quality management plans describing quality assurance objectives  
    - quality control (QC) protocols  
    - format-specific instructions  
  - records documenting validation actions, such as:  
    - equipment calibration and test reports  
    - image quality testing results  
    - QC plans, procedures, and reports | Documentation related to digitization project management and validating each digitized record. **Exclusion:** Administrative, technical, and descriptive metadata captured during the digitization project must be transferred to NARA with the digitized records (36 CFR 1236.58(h)). | DAA-GRS-20XX-000X-0002 |

**Exclusion:**

- Records related to digitizing permanent records.
1. Digitized records and associated metadata; the appropriate current, approved agency-specific records schedule or applicable GRS item covers these.

<table>
<thead>
<tr>
<th>Number</th>
<th>Description</th>
<th>Legal Citation: 36 CFR 1236.58(g)</th>
<th>Notes</th>
<th>Legal Citation: DAA-GRS-20XX-000X-0003</th>
</tr>
</thead>
<tbody>
<tr>
<td>021</td>
<td>Records related to digitizing temporary records. Documentation associated with validating each digitized record.</td>
<td>Temporary. Destroy when the records digitized using the validation process are destroyed, but longer retention is authorized if required for business use.</td>
<td>Temporary. Destroy when the records digitized using the validation process are destroyed.</td>
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<td></td>
<td>Supersedes: DAA-GRS-2019-0003-0001 (GRS 4.1, item 050) – when digitized versions are destroyed</td>
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<tr>
<td>GRS 5.2, 010</td>
<td>Copies of Digitized Records</td>
<td>Copies used for quality control or quality assurance purposes. (Transitory Records)</td>
<td>Temporary. Destroy when no longer needed for business use, or according to agency predetermined time period or business rule.</td>
<td>DAA-GRS-2017-0003-0001</td>
</tr>
<tr>
<td>GRS 3.2, 050</td>
<td>Backup copies of permanent records.</td>
<td>Temporary. Destroy immediately after the identical records have been captured in a subsequent backup file or at any time after the transfer request has been signed by the National Archives, but longer</td>
<td></td>
<td>DAA-GRS-2013-0006-0007</td>
</tr>
<tr>
<td>GR5 3.2, 051</td>
<td>Backup copies of temporary records.</td>
<td>Temporary. Destroy immediately after the identical records have been deleted or replaced by a subsequent backup file, but longer retention is authorized if required for business use.</td>
<td>DAA-GRS-2013-0006-0008</td>
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<tr>
<td>GR5 5.1, 020</td>
<td>Other non-recordkeeping copies that are retained for uses other than convenience or reference.</td>
<td>Temporary. Destroy immediately after copying to a recordkeeping system or otherwise preserving, but longer retention is authorized if required for business use.</td>
<td>DAA-GRS-2016-0016-0002</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>Reference copies.</td>
<td>Non-record</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>
INTRODUCTION

Schedule Subject
GRS 4.5, Digitizing Records

Additional Background Information
GRS 4.5 is a new schedule for records created and maintained relating to the function of digitizing records. It was developed to support NARA’s standard for digitizing records found in 36 CFR 1236 Subparts D and E. It combines disposition of records previously scheduled in GRS 5.2, item 020 (hardcopy source records), and GRS 4.1, item 050 (validation records related to digitizing temporary records), and adds a new item for project management and validation records that agencies are required to create when digitizing permanent records.

Overall Recommendation
Approval of the attached schedule is recommended based on NARA Directive 1441 Appraisal Policy of the National Archives and Records Administration.

APPRAISAL

Item 0001 (GRS 4.5, item 010): Original Source Records
This item provides disposition authority for original source records. It covers original source records that were previously scheduled as temporary, regardless of age, provided that the digitized versions meet the standard established in the regulation for digitizing temporary records. It covers original source records that were previously scheduled as permanent, provided the records were created after January 1, 1950, and the digitized versions meet the standard established in the regulation for digitizing permanent records. If the digitized versions do not meet the standards established by the regulations, this GRS cannot be applied to original source records and an agency-specific schedule will be required.

The 1950 date exclusion is based on issuance of the 1950 Federal Records Act, which established modern recordkeeping practices in the Federal government. If records created prior to that date are digitized and the agency wants to destroy them they must submit an agency-specific schedule as we want the opportunity to review the records prior their destruction. The
agency may also submit an exception request to transfer the original source records. If that request is denied, a new schedule is still required to destroy the records.

This GRS does not cover permanent original photographic negatives, transparencies, aerial film, roll film, micrographic, or radiographic materials that must be digitized using transmissive digitizing techniques, or dynamic media, including motion picture and audio visual records because at present there are no NARA regulations providing standards for digitizing these formats. Once NARA issues standards for digitizing these formats we will revise the GRS accordingly.

The GRS also excludes records that have intrinsic value, as defined in NARA’s Appraisal Policy. If original source records are suspected to have intrinsic value the agency will need to submit an exception request to transfer the analog records. This does not preclude the agency from digitizing the records. If NARA determines that the original source records do not have intrinsic value the agency may destroy the originals using the GRS, as we will have determined they do not fall under the exclusion.

There are also legal and administrative situations which might result in records being excluded from the GRS, in which case the agency would have to schedule the original source records (see exclusion 5 on the schedule).

This guidance on what to do when records are excluded from the GRS is included on the schedule and will also be explained in a FAQ.

**Proposed Disposition:** Temporary  
**Appropriateness of Proposed Disposition:** Appropriate  
**Appraisal Justification:**  
* Previously approved as temporary. DAA-GRS-2017-0003-0002 (GRS 5.2, item 020)—in part (only supersedes original hardcopy or analog source/input records). These records have been scheduled as temporary via the GRS since 1987. These records become non-recordkeeping copies once the digitized versions are validated to the standard in the regulation and no longer have business use. Any archival value is transferred to the digitized version, which becomes the recordkeeping version.

**Adequacy of Proposed Retention Period:** Adequate from the standpoint of legal rights and accountability. The retention has not substantially changed and is still based on validation of successful creation of the digitized version. 36 CFR 1236.36(a) states that temporary original source records may be destroyed when the agency has validated that the digitized versions meet the standards in §1236.32. 36 CFR 1236.58(e) states that after validating, agencies may destroy the original source records pursuant to a NARA-approved records schedule that addresses disposition after digitization. This GRS provides that disposition authority in cases where the exclusions and conditions of the GRS have been observed.

**Media Neutrality:** Approved. (Technically, this item only applies to non-electronic records.)
Item 0002 (GRS 4.5, item 020): Project management and validation records for digitized records. -- Records related to digitizing permanent records.  
Item 0003 (GRS 4.5, item 021): Project management and validation records for digitized records. -- Records related to digitizing temporary records.  
Item 0002 is new and created to cover project management and validation records that agencies must create when digitizing permanent records per 36 CFR 1236.46. Item 0003 revises the item previously issued for validation records for digitizing temporary records required by 36 CFR 1236.34.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate.

Appraisal Justification:

*Previously approved as temporary. DAA-GRS-2019-0003-0001 (GRS 4.1, item 050) – when digitized versions are destroyed. This item will be superseded by GRS 4.5, item 021.

*The records do not meet the appraisal criteria for permanent preservation. The records maintained under this item are kept to document agency compliance with NARA regulations for the digitization of records. They may be used for inspection purposes, but NARA does not consider them as required for understanding permanent records.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. The retention for item 0001 is based on 36 CFR 1236.58(g), which states that agencies must retain the project documentation described in §1236.44 until the National Archives confirms receipt of the records and gives notice that it has accepted legal custody of the records. The retention for item 0002 has not substantially changed. Per §1236.34(c) “Agencies must document the validation process and retain that documentation for the life of the process or the life of any records digitized using that process, whichever is longer.” Agencies may retain validation records as long as needed to meet business needs.

Media Neutrality: Approved.

ANDREA M. RILEY
Appraiser

Supervisor Concurrence: PENDING FINAL MEMO