Guide to Inventorying, Scheduling, and Disposition of Federal Records

National Archives and Records Administration
July 2025

Issuance History

Date	Comments
July 2025	First issuance of current edition

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Definition of a Record

See [44 U.S.C. 3301](#) for the legal definition of a record.

A record is information, regardless of format, that is**:**

- Created or received by the federal government in the course of business, and
- Preserved, or should be preserved, due to its evidential value in documenting the U.S. government, or its informational value

Library and museum materials made or acquired for reference or exhibition purposes are not records.

Breaking down the definition of a record

Recorded information. Information that agencies capture. *See also [44 U.S.C. 3301](#) for the legal definition.*

Regardless of physical form or characteristics. The agency captures the information either in analog/hardcopy or digital format. The medium may be paper, film, disk, or another physical type or form. The method of capture may be manual, photographic, automatic, or a combination of these.

Made. The act of creating and recording information by agency employees or systems. Such recorded information is often circulated or otherwise available to others.

Received. The acceptance or collection of documentary materials by agency employees:
- Regardless of who originated the materials.

- Regardless of how the materials were transmitted.

Received does not refer to misdirected materials. It may or may not refer to loaned or seized materials. Consult your agency legal counsel about government ownership of loaned or seized materials.

Preserved. The agency maintains the records, whether they exist in a filing system or not.

Appropriate for preservation. The agency should maintain the records, even if they don't have formal recordkeeping policies and practices.

In summary:

- Records are made or received by a federal agency either to follow a law or to conduct public business. As a result, they belong to the government rather than to individuals. Whether records are permanent or can be destroyed depends on approval from the Archivist of the United States.

- Records are, or should be, maintained because they:
    - Provide evidence of an agency's organization, functions, and activities, or
    - They contain information of value, such as the persons, places, things, or matters dealt with by an agency.

Non-record Materials

Non-record materials are those that fail to meet the legal definition of a record. The following are specifically excluded in the law:

- Extra copies of documents preserved only for convenience of reference.
- Stocks of publications. This includes special studies, brochures, pamphlets, books, handbooks, manuals, posters, and maps. Each agency needs to create and maintain record sets of publications and official reports.
- Library and museum holdings.

Contact your [NARA appraiser](#) if you are unsure information or data is a record.

Non-record reference copies may still be subject to legal discovery or Freedom of Information Act (FOIA) requests.

Examples of non-record materials
- Copies kept only for convenience of reference, not containing any unique information, and not used in taking actions.
- Duplicate copies of documents maintained in the same file.
- Publications received from external organizations used for reference purposes.
- Physical exhibits, artifacts, and other objects that do not have evidential value.
- Contact lists associated with email and personal devices.
- Individual user contact lists associated with email accounts and personal devices.

Working Files

Working files, or working papers, are often records. For example, the following working files are records:
- Case working files
- Working files used in preparing reports or studies
- Preliminary drafts of policy documents circulated for comment are also records.

Agencies should carefully review the files before deciding that specific working files are not records.

Working files are records when:

- They were circulated or made available to employees, other than the creator, for official purposes such as approval, comment, action, recommendation, follow-up, or to communicate with agency staff about agency business; **AND**

- They contain unique information, such as substantive annotations or comments that adds to a proper understanding of the agency's formulation and execution of basic policies, decisions, actions, or responsibilities.

Agencies need to manage working files that are records to ensure adequate and proper documentation. *See also* *36 CFR 1222.12(c)*.

For more information on working files as copies, see the next section.

When Is A Copy A Record

Whether a document is an original or a copy does not define its record status. Copies of a single form may each be a record because each serves a separate purpose. Many copies are records. Record status depends on how the document is used to conduct business, not on uniqueness. *See also* [36 CFR 1222.12(d)](#).

Only copies kept for convenience or reference are non-record. An example of a non-record copy would be an individual employee's personal copy of a procedure. Personal copies of records are becoming more rare as information is available online.

Copies are records when:

- They are used to conduct business
- They have a function or purpose that is different from other copies of the record
- They are posted on a website (internally or externally)

Copies posted on websites are records. They have a function and purpose that is different from the original or other copies. Namely, that purpose is to make information available to the public or other users.

Copies that are records must have a NARA-approved disposition authority.

Types of copies

Non-recordkeeping copies. Original records or copies of records that are not identified as the recordkeeping copy. Usually, these are copies of records someone used in the course of business, but are not the copy stored in a recordkeeping system. [GRS 5.1](#), item 020, covers electronic non-recordkeeping copies as long as they have the same purpose as the recordkeeping copy.

Examples of non-recordkeeping copies:

- Electronic mail. The original copy resides in a user's inbox and the preservation copy is stored in an email archive. The original copy is a non-recordkeeping copy because the archived copy is the recordkeeping copy.

- Case files vs. working files. A user may have electronic copies of records in a working file that eventually go into a case file system. The case file system is the recordkeeping copy. The copies in the working file are non-recordkeeping copies.

Source records. The record from which a digitized version or digitized record is created. The source record should be the record copy that was used in the course of agency business (36 CFR 1236.41). GRS 4.5, item 010, covers most source records that are digitized to NARA standards (see the GRS for other exclusions).

Digitized records. A digital record created by converting paper or other media formats to a digital form that is of sufficient authenticity, reliability, usability, and integrity to serve in place of the source record (36 CFR 1236.41).

Input records. The records from which information in an electronic system originates. They include electronic records such as upload files staged for ingest into a system. They also include paper or analog records such as paper forms, where information is manually entered from the form into the system. GRS 5.2, item 020, covers these input records.

Working drafts. Preliminary drafts created in the process of making a final document. Working drafts are often not true copies. They may contain comments or annotations that are unique information. Working drafts are non-record **only** if they were never circulated to anyone **and** they do not contain unique content. *See also the section above on Working Files and 36 CFR 1222.12(c)*. Working drafts can be intermediary or transitory records. *See GRS 5.2 and the Frequently Asked Questions About GRS 5.2 for more information about these types of records.*

Personal Materials

Materials belonging to an individual that are not used for agency business. They document personal and private matters or are kept for convenience.

Employees should identify their personal materials and maintain them apart from records and non-records.

Categories of personal materials include:

- **Materials from previous employment that are not used to conduct current business.** Examples include previous work files, political materials, and reference files.

- **Materials related to personal activities**. This includes family matters, outside business pursuits, professional activities, or private political associations. Examples include:
  - Personal correspondence

- Volunteer and community service records
- Literature from professional organizations
- Personal manuscripts and drafts of articles and books

- **Work-related materials that are not part of the conduct of agency business.**
  This includes:
  - Personal diaries or journals
  - Rough notes that are never circulated or relied upon in decision making
  - Personal appointment schedules or calendar entries

These records are difficult to tell from federal records because they are work-related. They are personal papers if:

- The employee treats them as personal papers and
- They serve only the person's own purpose. For example, as reminders and personal observations about work-related and other topics.

Distinguishing between Personal Materials and Federal Records

Federal courts have developed guidance in deciding Freedom of Information Act (FOIA) cases. Agencies can use this guidance to help determine if materials are records or personal papers. When thinking about the record status of work-related documentary materials, consider the following:

- **Creation.** Was the document created or received by an agency employee on agency time, with agency materials, and at agency expense? If not, then the document is unlikely to be an agency record. If so, it may or may not be an agency record, depending on other considerations.
- **Content.** Does the document contain only substantive information about agency business? Or does it contain only information about the employee's personal matters? Does it contain both official and personal information? If the document does not contain official information, it is likely not an agency record. If it does, its potential record status depends on other considerations.
- **Purpose.** Was the document created for agency business? If so, it may be an agency record, depending on its distribution and use by other agency employees. Was it created only for the employee's personal convenience? If so, it is unlikely to be an agency record.
- **Distribution.** Was the document distributed to other employees for an official purpose? If so, it is an agency record.

- **Use.** Did this employee or others actually use the document to conduct agency business? Materials brought into the agency for reference use do not automatically become records. These materials may not be records even if they relate to official matters or influence the employee's work. The materials are records only if the employee relies on them to conduct agency business or other employees use them for agency purposes.
- **Maintenance.** If it is on a shared drive or agency electronic system, it is likely an agency record. If it is not accessible for use by other employees or on a personal drive, then its record status may depend on other considerations.
- **Disposition.** Does a NARA-approved records schedule govern the document's disposition? If so, the document is likely to be a federal record and is also likely to be an agency record for FOIA purposes. The document is unlikely to be a record if the employee is free to destroy or remove the document at their discretion.
- **Control.** Has the agency established "institutional control" over the document? This occurs through applicable maintenance or disposition directives. Did it do so by requiring the document to be created in the first place? If so, the document is most likely an agency record.

In short, mere location in the agency does not mean that the materials are records, nor is use alone conclusive in determining record status. Materials generally assume record status when the agency asserts control by requiring them to be created or kept. Similarly, documents are not personal just because the employee is free to dispose of them. Other considerations determine whether the records are subject to agency control.

If materials include both agency information and personal information, personal information should be removed from any agency files.

Electronic Information Systems as Records

An **information system** is any automated system that facilitates the access to and management of information and records in a computer system.

What is not an information system:

- Computer hardware
- Computer networks
- Software

Computer hardware and networks are not records. They are things, so they do not need a records schedule. They may contain records, however.

Software, code, and computer applications can be records. If federal employees create or have created software, code or computer applications, it is a record. GRS 3.1, item 012, covers such records if they relate to other records scheduled as temporary.

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.

Information systems include three categories of information:

- **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 paper records or forms where the information is scanned or entered into a system by hand. Input records also can be electronic files, such as copies of data files. See GRS 5.2, item 020, for disposition of most input records.

- **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.

- **Outputs.** These are the products of an information system. Products can include digital or printed reports, data files, and even query results. System outputs are records that must be scheduled, unless they qualify as transitory records (GRS 5.2, item 010).

Information systems also have documentation. This documentation may take the form of user guides or codebooks. It explains how the system works. 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.

See also: Guide 9: Scheduling Electronic Systems

Other Common Terms

Disposal: Final actions taken on temporary records after their retention periods expire. These actions include destruction or donation. Note that NARA must approve the donation of temporary records to a person or entity.

Disposition: The actions taken on federal records when they are no longer needed to conduct current agency business. This is also the final stage of the records lifecycle.

Disposition actions include:
- Transfer of records from one federal agency to another.
- Transfer of permanent records to the National Archives of the United States.
- Disposal of temporary records no longer needed to conduct agency business.

Records lifecycle: The basic stages that records go through.
1. Creation or receipt
2. Maintenance and use
3. Disposition

Records series: A group of records, regardless of format, kept together for one or more of the following reasons:

- They relate to a particular subject or function
- They result from the same activity
- They document a specific kind of transaction
- They have some other relationship arising out of their creation, receipt, or use

The record series concept is a convenient way of grouping files or documents to manage them as a group.

RECORD VALUES

All records have a purpose, use, and value. That value may be to the agency creating or receiving them or to another agency. This is the business use value of the records.

Archival value is the potential for ongoing use of the records. NARA only preserves those few federal records that have archival value. The Archives accepts these records after an agency's business use ends. The following describes the agency's and NARA's perspectives on the value of records.

Agency Perspective: Business Use Value

Records have value to an agency because:
- They are the basic tool by which the agency conducts its business.
- They document the agency's organization, functions, policies, decisions, procedures, and essential transactions.
- They may protect legal and financial rights of the government, individuals, or organizations.

Agency record values fall into three overlapping categories. Understanding these values helps agencies identify retention periods that will meet their needs.

Administrative Value

Administrative value refers to the usefulness of records in conducting an agency's business. All records have administrative value. The duration of this value may be long or short. Some records, such as program directives, have long-term administrative value. Others, such as IT help desk tickets, have short-term administrative value. Many records have short-term administrative value because they duplicate or summarize information.

Some records may also have administrative value for internal or external audits or inspections of business functions. Records may need to be kept for a specific period of time to ensure that agency programs are in compliance with policies and procedures.

Fiscal Value

Records with fiscal value document the agency's financial transactions and obligations. Examples of records with fiscal value include:
- Budget records
- Financial transactions
- Accounting records
- Information used for financial audits

Financial records are similar across the government. Only the data differs from one agency to another.

Legal Value

Legal value is the usefulness of records in protecting rights and interests. These rights and interests may belong to the government, individuals, or organizations.

Examples of records with legal value include:
- Legal opinions
- Claims
- Workers' compensation
- Exposure to hazardous material
- Survivor benefits
- Leases and titles
- Contracts
- Criminal investigations
- Issuance of licenses and permits
- Loans, subsidies, and grants
- Social security
- Trust agreements between the government and Native Americans

Concern for legal value applies only to temporary records. If records are permanent they will always be available to protect legal rights.

The legal value of some records diminishes quickly, such as the value of a contract after final payment. Other records, such as claims and related records, may need to be kept for long periods of time to make sure information is available. Agencies should consult their legal counsel when determining the retention of records with legal value.

Factors that affect how long agencies need to keep records with legal value include:
- The duration of the commitment, such as benefits for the life of an individual

- The duration of risk, such as with hazardous or nuclear waste
- The statute of limitations for claims or lawsuits
- Regulatory limits for claims or prosecution
- Regulatory or statutory requirements on recordkeeping
- Right to appeal
- The availability of the same information in other record series or systems

NARA Perspective: Archival Value

Although agencies recommend retention periods, only NARA determines and approves final disposition. NARA identifies records as having either temporary or permanent value.

Temporary: Agencies may destroy records after the specified retention period.

Permanent: Agencies may not destroy the records. They must transfer the records to NARA, unless another arrangement is in place.

Permanent records have enough historical or other value to warrant permanent preservation. NARA may also keep records because they have evidential or information value.

Evidential records document an agency's origins, organization, functions, and significant transactions and activities.

Informational records document the persons, places, things, or matters an agency deals with.

NARA's Appraisal Policy explains the criteria NARA uses to determine if federal records have archival value. The vast majority of federal records do not meet these criteria.

See also:
Guide 1: Scheduling Common Permanent Agency Records
NARA Scheduling Guides

Intrinsic Value

Intrinsic value is another form of archival value. It refers to physical qualities or characteristics that make the record valuable in its original form. Intrinsic value only exists in paper or analog records.

NARA defines the qualities and characteristics of intrinsic value in Appendix 3 of our Appraisal Policy. These include:

1. Physical form that may be the subject for study if the records provide meaningful documentation or significant examples of the form

2. Aesthetic or artistic quality
3. Unique, curious, or historical physical features or formats
4. Age provides a quality of uniqueness
5. Value for use in exhibits
6. Questionable authenticity, date, author, or other characteristic that is significant and ascertainable by physical examination

Agencies must transfer records with intrinsic value to NARA in their original form. Agencies may not destroy these records if they are digitized (see GRS 4.5, item 010).

Contact your NARA appraiser if you believe your agency has records with intrinsic value.

See also:
Intrinsic Value Checklist
Guide 8: Scheduling Records with Intrinsic Value
Intrinsic Value (Microlearning Video)

KNOWING YOUR RECORDS

Records Inventory Basics

The first step towards good records management is to know what you have to manage. The best way to know what you have is to conduct an inventory.

What Is a Records Inventory?

A records inventory is a descriptive listing of records or systems your agency creates or receives.

An inventory is not a list of each document or folder in an agency or program office. Records must still be organized into series or groups. (See Records Basics - Definitions for what is a series.)

A records series is a group of records, regardless of format, kept together for one or more of the following reasons:

- They relate to a particular subject or function
- They result from the same activity
- They document a specific kind of transaction
- They have some other relationship arising out of their creation, receipt, or use

The record series concept is a convenient way of grouping files or documents to manage them as a group.

It may help to instead think of the inventory process as creating a profile of the records. You are collecting information about the records your agency creates in order to describe how and where the records are used. Such a profile helps to answer questions such as:

- What records does a function or office create and use?
- Are all records currently covered by an approved records schedule?
- Have we identified our essential records?
- Where are our permanent records and when are they due for transfer?
- Do our record schedules reflect current business activities?

Types of Record Inventories

The type of inventory you conduct will depend on what you are trying to accomplish. The two primary types of inventories are Baseline or Initial Inventories and Record Scheduling Inventories. You may also conduct a records inventory for other information management purposes. These inventories differ not only in why they are conducted but in how much information they collect.

Baseline or initial inventories

The purpose of a baseline inventory is to understand what you have and how it is currently stored and managed. These types of inventories:
- Identify and assist with control of the agency's information assets.
- Point out records that need to be scheduled.
- Highlight opportunities to consolidate or automate how records are stored, protected, and managed.

These inventories vary in scope. They may be done for the entire agency, a function your agency performs, or a single program/office, depending on the need.

The level of detail is usually less. The information collected for this type of inventory is usually limited to what records exist, who uses them, what formats are the records and, and where are they kept.

Inventories for scheduling records

The records scheduling process should begin with a records inventory. This step in the scheduling process may vary depending on your situation. Records that were previously scheduled will have slightly different information needs from those that have never been scheduled.

The scope may vary depending on the end goal of the effort. An agency that wants to move to big bucket/aggregate item schedules will need a comprehensive inventory. An agency looking to schedule a new program or function may only need to inventory a single office.

The level of information collected will be significantly more than a baseline inventory. This information is needed to create the record schedule and so that NARA can appraise the records.

An inventory for scheduling purposes tells the story of how, when, and by whom the records are created. In this type of inventory, you'll collect information about how the records are used, about any other programs or stakeholders who have an interest in the records, and about any laws, regulations, audit requirements, or business procedures that affect how long the records are needed.

The content and scope of your inventory will depend on why you are scheduling records. Records scheduling scenarios may involve one or more of the following:
- The need for a new schedule because:
  - Your agency starts a new program or function/activity
  - You are made aware of unscheduled records in your agency
- The need to reschedule records because:
  - A program office wants to change something about a schedule for their records
  - Processes related to the records change, including new record types being created or records no longer being created
  - New business, legal, audit, or regulatory requirements require a change in the retention of the records
  - The previously approved disposition instruction no longer works
  - You've reviewed your schedules that are 10 years or older and found items to update
  - You want to do a comprehensive update to reflect changes to work processes or records management practices
  - You want to move to big buckets or functional schedules

Other types of inventories

Records inventories are appropriate any time you need to know what information assets you have or need to take action on. The scope and level of detail you collect should be based on need. Other reasons you may want to inventory records include:
- Identifying permanent records to ensure timely transfers to NARA
- Identifying classified record or records that require special accountability
- Identifying records impacted by natural disasters
- Identifying damaged or hazardous records for an emergency disposal request
- Implementing new General Records Schedules
- Specialized inventories, such as for Quality Management Records or essential records

- Managing records for presidential transitions

Why Should You Inventory Your Records?

Records inventories are required as part of the scheduling process. *See [36 CFR 1225.12(b)](#)*. That is not the only reason you should inventory records, however. Inventorying your records also has multiple benefits:

- Know what you have and what you need to manage
    - Support partnerships with IT Enterprise Architecture inventories
    - Support classified information accountability
    - Identify and manage Quality Management records
    - Identify at risk records or digital records that need migration or preservation plans

- Identify records management issues, including:
    - Inadequate documentation of official actions
    - Improper applications of recordkeeping technology
    - Deficient filing systems and records management practices
    - Poor management of non-record materials
    - Insufficient identification of essential records
    - Inadequate records security practices
    - Opportunities to streamline, automate, and centralize access to information

- Build relationships between the Records Management Program and program offices

- Collect information for records scheduling and appraisal

Why Is an Inventory Necessary for Scheduling Records?

The records schedule is key to effective records disposition. It's not good enough that the agency understands what the records are. The appraiser and the public need to understand as well, based on the information provided on the schedule. This is especially true for temporary records proposed for destruction. Collecting detailed information about the records for scheduling helps everyone understand the complete content, context, structure, use, and value of the records.

The record schedule should be based on information gathered during the inventory process. The more complete the inventory, the better the schedule is likely to be.

Inventorying is useful not only in developing the schedule but also in ensuring that it is applied properly and kept up to date. A records inventory can identify when:
- Processes and workflows change
- Records retention needs change
- Records are no longer created
- There are new records related to a function

Benefits of conducting an inventory when scheduling records:
- You can write better record descriptions that explain the content and context of the records.
- You can explain the process the records are related to, such as what information the records contain, where it came from, and what it is used for.
- You can explain why the proposed disposition instruction is appropriate.
- You can be confident that the proposed retention time for the records will meet all stakeholders' needs.

Guidelines for Inventorying Records

[Records Inventorying Checklist](#) - This job aid will walk you through the basic steps of the records inventorying process.

Know What Your Agency Does

Before starting any inventory project, look at your agency's organizational structure and functions. Familiarizing yourself with your agency's organizational structure helps to determine how information might flow through the agency. It also can show where certain functions or activities take place in your agency. Understanding the functions of your agency helps you understand the records it creates or receives when fulfilling those activities. Even if you are only inventorying a single program or office you should understand the program's or office's functions. Knowing your agency's functions is even more important if you are doing a comprehensive records inventory. Reviewing agency functions shows how different functions and their records interrelate across the agency.

How to identify your agency's functions

An agency's functions are reflected in its program responsibilities structure, and levels of authority. To find this information:
- Examine laws, regulations, organization charts, and functional statements
- Consult program managers, information technology managers, FOIA/Privacy, and records personnel

Answer the following questions:
- Which are the key line and staff offices?
- What programs does the agency have?
- What programs or functions share information?
- What units develop policies?
- Where are staff support activities performed? These include:
  - Legal
  - Fiscal and budgetary
  - Inspection
  - General management
  - Administrative services

Know Your Recordkeeping Requirements and Practices

It is also important to review the agency's recordkeeping requirements and practices. Answer the following questions:
- Look at your existing schedules:
  - What records are scheduled?
  - How long ago?
  - Are those schedules accurate?
- What are the agency's recordkeeping requirements?
- Have recordkeeping requirements been established for records in all formats?
- Is there a prescribed agency-wide records maintenance system? If so, how widely is it used? If not, what systems are used instead?
- Is there a prescribed classification system for general correspondence? If so, is it numeric, subject-numeric, or some other system?
- How are case files or project records organized and managed?
- What agency policy and procedures, if any, govern essential records, adequacy of documentation, personal papers of officials, and Privacy Act and Freedom of Information Act concerns?
- Look for additional sources of information
  - Does your Information Technology office have inventories of systems or data repositories?
  - Does your Chief Data Officer have inventories of agency data sets or repositories?
- Identifying the right people to talk to. You may need different people for different types of information.
  - Identify system owners
  - Business process owners
  - Program staff that actually create or use the records
- Be mindful of the types of information your NARA appraiser will need

○ See [Common Appraisal Questions](#)

Know Your Goals

Before starting a big project like a records inventory, identify your goals.

Ask the following questions:

- What is the scope of your project?
    - The entire agency? A certain function or activity? A certain office?
    - Are you seeking to schedule records, identify where certain types of records are so you can manage them better, or are you interested in a certain type of record like essential records or data sets?
    - Do you want to change your agency's scheduling approach, such as moving to Big Bucket or functional schedules from traditional schedules?
    - Are you dealing with unscheduled records or scheduled records?
    - Are your existing records schedules old? If so, they may not reflect current business practices, so additional information will be needed.

The answers to these questions will help determine how much information you need to collect and from whom. Inventories for scheduling records, especially those for unscheduled records or outdated schedules, are more likely to require more detailed information.

Prioritize Where to Start

Your goals will help you prioritize where to start the inventory.

Ask the following questions:

- Where is the greatest need? This will help determine where to start.
    - Where are records unscheduled?
    - Where are records schedules outdated?
    - Where do records need to be disposed?
    - Have you identified your essential records?
    - What functions, activities, or offices are more likely to create permanent records?

Consider what is possible with the resources you have when deciding on the scope of your project. If you need a comprehensive overhaul, but don't have the resources, prioritize based on need:
- Functions that are most likely to have permanent records:

- ○ Senior officials
- ○ Offices of functions related to the mission of your agency
- Areas where the schedules are particularly old and may not represent current business processes and needs
- Deprioritize records of lesser value like administrative records or see if you can use the GRS for them

Make a Plan

Your goals and purpose for your inventory will influence your approach.

1. Figure out the scope of your inventory.
   - Will the inventory be comprehensive or will it focus on a single office or function?
   - What order will you approach different functions or offices in?
   - You don't need to collect the same level of information for scheduled records as you would for unscheduled records or records that need to be rescheduled.

2. Determine who will conduct the inventory.
   - Will the work be done by staff from the Records Management office, records liaisons, a data call? Who conducts the inventory and how they do it may depend on your goals and how much time you have for the project.
   - Not all approaches will work equally well depending on your goal. A data call is not likely to produce sufficient information to schedule records.

3. Prepare the inventory form or collection tool. Agency records are most suitably inventoried by series or system. Decide what inventory elements are necessary and then use a form, or forms, to collect the same information on each series/system. Below is an example of an inventory form with instructions. It includes questions that collect information that will be required when scheduling the records.

   Sample Inventory Form with Instructions
   ERA 2.0 Schedule Data Entry Tool

   Collect information about all records, even non-records. Non-records should also be located, described and evaluated in terms of use. You should assign retention periods to them and include nonrecord series in your agency disposition manual.

4. Identify where agency records are located. Records may be in different formats: paper, electronic, audiovisual. They may be stored in office space, a records storage facility, or on a server.

Communicate About Your Project to Get Buy-In

Get support from your senior management. Management buy-in is essential for success. It may be useful to have management issue a directive or notice about the inventory project.

Communication with agency staff is also essential to a successful inventory project. Develop a communication plan. Make sure that offices involved in the inventory project know about it. Make plans to keep management and staff informed about your progress.

Meet with the staff that will be conducting the inventory. Make sure that they understand the goals of the project. Provide training, if needed. Records management staff may not require as much training as program staff that are unfamiliar with records management practices.

Conduct the Inventory

Data collections or surveys may work to collect very basic records information, but the best practice to collect thorough information about the records your agency creates is to meet with the people that create and use the records.

- Keep in mind that agency staff may not know records management terminology or processes. Consider starting with a brief introduction on what records management is and why it is important.
- Ask about processes rather than records. Staff may not realize that the information they use or create while conducting business is a record. Ask about what they do and what information they use or create. Then you can identify the records.

Verify and Analyze Findings

The records management office should assess the quality of the inventory's results. Spot-check the results for obvious errors, such as missing information and intermixing two or more series. If someone else has prepared the inventory, examine some of the inventoried records to confirm the accuracy of the information recorded on the inventory form. If spot-checks reveal multiple issues, records management staff may need to re-inventory the records.

Follow-up On Your Findings

The follow-up to an inventory project will depend on the goal of the project.

- If the goal was to identify unscheduled records or schedules that need to be updated, then prepare new schedules.

- If the goal was to have better intellectual control of a certain type of record, such as essential records, then you may need to update internal tracking documentation or records disposition manuals.

SCHEDULING RECORDS

Record Scheduling Basics

What is a records schedule?

By law, all federal records must be covered by a NARA-approved records schedule. Agencies must not destroy records until they are approved for destruction on an approved records schedule. (*[44 USC 3314](#)*).

An approved records schedule is a legal authority. It identifies and allows for disposal of a federal agency's records. A records schedule describes:

- The informational content and formats of records
- The context or function of the records
- Whether and when an agency may destroy its records; or
- Whether and when the agency must transfer the records to the National Archives for permanent preservation.

Records schedules apply to existing records. They usually apply to records created on an ongoing basis. Sometimes they only apply to a time-bound set of records.

There are two types of records schedules:

- **Agency records schedules** that apply to records of a specific agency or agencies. The schedule identifies which agencies it applies to.
- NARA-issued **General Records Schedules (GRS)** that provide disposition authority for records that are common across the federal government.

Why must agencies schedule records?

The Federal Records Act requires agencies to submit records schedules to NARA for review. NARA determines whether those records have enough value to warrant preservation or if they may be destroyed. (See *44 USC 3303 and 3303a*.) In addition, the regulations also state that all federal records, including those created or maintained for the government by a contractor, must be covered by a NARA-approved agency disposition authority or a GRS. (See *36 CFR 1225.10*.)

There are also benefits to scheduling your agency's records. Scheduled records:

- Show what records an agency has and needs to manage.
- Help agencies respond to requests for records under the Freedom of Information Act (FOIA).
- Help agencies respond to discovery orders from the courts.
- Identify high-value, permanent records so agencies can transfer them to the National Archives.
- Save taxpayer money by authorizing the destruction of records that aren't needed.
- Help agencies streamline their business processes.
- Minimize the risk that records with privacy or other protected information are accidentally released.
- Prevent premature or delayed destruction of records.
- Help agencies stay in compliance with federal records and information technology requirements.

Where are approved records schedules available?

Approved agency records schedules are available on NARA's [Records Control Schedules](#) web page. See the [Records Controls Schedules (RCS) Frequently Asked Questions](#) for more information about the RCS. Agencies reschedule records over time, so older items or schedules may be superseded. We are marking superseded schedules as an ongoing process. Schedules are marked inactive when all items on the schedule are superseded or when NARA verifies that all items on a schedule have been transferred to NARA or destroyed.

What happens if there isn't a records schedule, or the schedule isn't followed?

Records cannot be legally destroyed without an approved records schedule.

Agencies must treat unscheduled records as permanent until they are scheduled.

It is unlawful to destroy or remove federal records from federal custody without a records schedule. Such destruction or removal is called an "unauthorized disposal." You can learn more about this topic on NARA's [Unauthorized Disposition](#) web page.

When should agencies submit a records schedule for NARA approval?

Agencies must submit new records schedules when:

- An agency has new records that are not covered by an existing schedule or the GRS.
- An interagency reorganization reassigns functions to an existing department or agency. In this case, the gaining organization must submit a new records schedule to NARA within one year of the reorganization.
- A new department or agency assumes functions from an existing one. The new agency must schedule records documenting the acquired functions that are not covered by the GRS within two years.
- An agency needs to deviate from retention periods in the GRS.
- An agency needs to change retention periods for records previously appraised as temporary by NARA.
- An agency needs to change the approved disposition of records from permanent to temporary or vice versa.
- The informational content or the function documented by the records changes, so the agency must change the description of the records.

- An agency decides to change the scope of a non-Big Bucket records schedule item to include a greater or lesser aggregation of records.
- An agency decides to move one or more series between two aggregate items.
- Records are now in a digital format and the analog records are described t on a schedule that specifically excludes electronic records.
- Program records are maintained solely on an agency web site.

See also [36 CFR 1225.22(b)](#).

Records Schedule Requirements

Records Schedule Requirements

NARA may return a schedule to an agency for revision if it does not meet standards in [36 CFR 1225](#) and other formal NARA guidance.

Schedules must include:

- Clear descriptions of the records at the series or system level
- Clear and applicable cut-off and disposition instructions
- Citations to superseded schedule items, if applicable
- Adequate justifications for series that deviate from the GRS
- For permanent records, the inclusive dates, the total volume, and the annual accumulation
- Whether General Accounting Office (GAO) concurrence is not required, has been obtained, or has been requested

See also:
[Records Schedule Quality Control Checklist](#)

How to Schedule Records

[36 CFR 1225.12](#) explains the basic process for developing a records schedule. Agencies should follow these steps to complete a successful records schedule:

1. **Conduct a functional or business process analysis.** See *[Knowing Your Records - Know What Your Agency Does](#)*.
2. **Conduct an inventory.** You need to know the records you are scheduling to successfully schedule them. See *[Knowing Your Records](#)* for more information about inventorying your records.
3. **Determine the appropriate scope of the records schedule items.** The scope of a schedule describes where the schedule applies, such as a single office or

agency-wide. It also includes the level of aggregation of series into items within the schedule. For more guidance and the available options, see *How to Schedule Records - Scoping Records Schedule Items*.

4. **Analyze disposition and retention needs.** Propose final disposition of records and how long your agency needs to keep records before disposal or transfer. See *How to Schedule Records - Analyzing Disposition and Retention Needs*.
5. **Create the records schedule.** Collect all the necessary information you will need and draft your schedule items. See *How to Schedule Records - Creating the Records Schedule*.
6. **Obtain clearances and approvals.** See *Obtaining Internal Clearances and External Approvals* for more information on this part of the process.

Complete these steps before submitting a draft schedule to NARA.

Why does NARA ask for so much information on the records schedule?

Records schedules need to provide clear and concise record descriptions and implementable disposition instructions so that:

1. **NARA can appraise the records.** We have to understand what the records are and how the agency uses them to approve their disposition. We also have to make sure that agencies keep records reasonably long enough.
2. **Your agency can use the schedule.** Agency staff now and in the future need to be able to understand the schedule. They need to be able to recognize their records to know which disposition authorities to use.

Be prepared to support your NARA appraiser throughout the appraisal process in the following ways:

- Your agency may need to provide information to the appraiser about the records and their use.
- You may need to add additional information to the schedule or make revisions.
- Your agency may need to let your appraiser look at examples of records.
- Your appraiser may need to speak with records custodians and program offices.

Scoping Records Schedule Items

There are two factors to consider when deciding on the scope of your records schedule:

- The **area of application** for a schedule refers to where in the organization the schedule can be applied. For example, the schedule applies to a single office or

unit, a division or subdivision, the entire agency, or many agencies within the same department. Options include:
- ○ Agency-wide
- ○ Department-wide
- ○ Agency Subdivision (individual office or division) - if using this option, you must identify the office or subdivision on the schedule

- The **level of aggregation** is the number of series covered by an individual item. Options include:
  - ○ **Individual Series (Granular) Item**
  - ○ **Fixed/Closed Aggregate Item**: an item that includes multiple series, but only those series specifically listed on the schedule or crosswalk
  - ○ **Flexible/Open Aggregate Item:** also known as a Big Bucket or functional item; it covers multiple series, but can be applied to any future records that the agency has that fall under the item description

Not all of these options can be used together. See the [Records Schedule Scoping Cheat Sheet](#) for additional information.

Area of Application

NARA-approved disposition authorities apply only to the organization identified on the schedule. See [36 CFR 1225.22](#) for guidance on rescheduling records due to an agency reorganization.

Unless the schedule specifies otherwise, disposition authorities apply retroactively to all existing records described in the schedule.

Office-based (Agency Subdivision)

- The schedule applies only to those records within the designated business unit.
- The business unit can be described at any level of the organizational hierarchy (unit, division, program, etc.).
- It is the most limited of the areas of application.
- Office-based schedules are often easier for agency staff to use. They only identify the records of a particular office and how to manage them.
- This type of schedule may require updates after an agency reorganizes to ensure that the schedule is still accurate.

Agency-Wide

- "Agency" refers to either an independent agency, such as the Environmental Protection Agency, or to a component of a larger department, such as the Centers for Disease Control under the Department of Health and Human Services.
- The schedule applies to the same records wherever they exist in the agency. This includes electronic systems used across the agency.
- The records covered by an agency-wide schedule must have the same content and uses, as well as the same retention and disposition periods. If this is not the case, then an agency-wide schedule is not appropriate.

Department-Wide

- Only Department-level Agency Records Offices can create these types of schedules.
- This schedule type applies to records in most or all components (agencies) of a larger Department. This includes electronic systems.
- The schedule must identify the component agencies it applies to. If any component should be excluded, do not include it in the records schedule field "Agencies to which this schedule applies."
- Department-wide schedules always consist of aggregate items (see *Level of Aggregation* below). Even if the schedule covers a single record series, it is an aggregate item because records exist in more than one agency.
- Department-wide schedules need a crosswalk that identifies superseded authorities from each component agency.
- Identifying the record series covered by this type of schedule requires considerable research and coordination across components of the Department.
- All component agencies need to agree with the Department about the disposition and retention of records on the schedule.

Level of Aggregation

The level of aggregation refers to the number of record series covered by an individual disposition item. Items either cover a single series of records or many, related record series. A schedule can have items with different levels of aggregation.

The options for level of aggregation are:

- Individual Series/System (Granular) Item
- Flexible/Open Aggregate Item (also known as a Big Bucket or functional item)
- Fixed/Closed Aggregate Item

See below for more specific descriptions of each item type and how to use them.

Individual Series/System (Granular)

- This is a disposition authority for one record series or electronic system.
- This type of item can either cover records on a recurring basis or cover records from a specific period of time.
- Use this type of item for:
    - A single series of records in a specific office.
    - The primary content of a single, discreet electronic system within an agency.
- This type of item has the least ambiguity about what records it covers.
- Individual series (granular) items may need more time to manage, track, and enter into recordkeeping systems.

Aggregate Items

- An **aggregate item** consists of many related series of records and/or electronic systems. *See also* *36 CFR Subpart B Part 1225.14(b)(1)*. In simple terms, an aggregate item groups together multiple records series related to the same work process, activity or function.
- Record series may also be grouped by the positions or roles of persons at certain management levels. See *Role-based Scheduling* for further information on this option.
- All series in an aggregated item must:
    - Have the same disposition. However, series should not be aggregated by a common disposition alone.
    - Relate to the same work process, activity, or function.
- Aggregate records schedule items may be *either* fixed/closed or flexible/open. The flexible/open option is also known as a big bucket item or functional item.
- Agencies must provide additional information to NARA when proposing aggregate records schedule items. NARA appraisers need to understand the scope of the item's coverage to appraise the schedule.
- Aggregate items are useful in agencies that reorganize frequently. Items based on work process and functions are less likely to need revision every time the agency reorganizes, provided functions and processes don't change.
- See the *Guide to Aggregate Item Schedules* for additional information.

Role-Based Scheduling

What is role-based scheduling?

Role-based scheduling is where the position or role of an individual is a factor in determining the disposition of records.

The role-based approach assumes that a small number of officials at or near the top of an organization create or receive the majority of permanent (or historically valuable) records. A Capstone schedule is an example of a role-based schedule approach. While the Capstone approach is relatively new, role-based schedules for senior agency officials are common.

[Best Practices for Role-Based Scheduling](#)

Analyzing Disposition and Retention Needs

What does disposition mean?

"Disposition" identifies the final fate of federal records that are no longer needed for current business. Permanent disposition means records will be transferred to the National Archives. A disposition of temporary means that the records will be destroyed.

What is a disposition instruction?

A disposition instruction consists of:

- The disposition, of identification of the records as either temporary or permanent;
- A cutoff instruction, either specific or implied; **and**
- Either the retention period or transfer period. The retention period is how long the agency must keep temporary records after the cutoff before destruction. The transfer period is how long the agency can keep the records after the cutoff before transferring them to NARA.

Disposition instructions should be realistic. For example, avoid scheduling records for destruction when an office or program terminates. This practice can lead to retaining records much longer than needed. Instead, agencies should use fixed time periods for records retention.

Likewise, agencies should limit use of the instruction "destroy when no longer needed" for temporary records. This instruction leaves decisions about retention up to individual users. It results in the records management program losing control of such records. It also often leads to over-retention or premature destruction. The disposition instruction "destroy when no longer needed" is also difficult to automate. For these same reasons, agencies should not borrow the flexible retention phrase from the GRS, "longer retention is authorized for business use."

Proposing Disposition

Although it is ultimately NARA's decision, agencies propose to NARA whether they think that records have permanent or temporary value.

The Appraisal Policy of the National Archives describes the types of records that NARA identifies as permanent.

NARA requires certain information about permanent records. In most cases there are fields in ERA to collect this information:

- The initial date of the records that the item covers
- The current volume of the records
- If the records are recurring, the annual accumulation
- The expected date of initial transfer of the records under the item
- Any access restrictions consistent with the Freedom of Information Act, including restrictions on security-classified information

In evaluating records for final disposition, it is important to recognize that:

- Different parts of the agency may use the same information. Compare similar records created at different organizational levels. NARA generally designates as permanent only the most complete series of records.
- Not all agency programs will have the same number of permanent series. Agency programs vary in significance based on their function and activities.

NARA will evaluate proposed disposition instructions during the schedule appraisal process and approve or suggest changes. NARA has the final authority on the disposition of federal records.

Your agency's [NARA appraiser](#) is available for advice throughout the scheduling process.

Cutoff Instructions

A cutoff instruction indicates the point at which records are no longer in active use and when the retention or transfer period starts. Cutoff instructions can be specific or implied. Specific cutoff instructions use the Cutoff Instruction field on the schedule. This field is optional. Alternatively, you can use implied cutoff instructions, where the cutoff instruction is part of the retention or transfer instruction.

Record retentions that are based on the age of the record, such as "Destroy when 3 years old," do not use cutoff instructions. They are unnecessary. The cutoff is implied as the date of creation or receipt.

ERA provides options for agencies to choose from to encourage clear disposition instructions. There are options for cutoff instructions, transfer instructions, and retention instructions. NARA recommends using these standardized options as much as possible. Limit the use of the "Other" option.

Specific cutoff instructions can be based on fiscal or calendar year or an event, or both. Examples of specific cutoff instructions that use the "Cutoff instruction field" on the schedule:

- Cut off at the end of the Fiscal Year. (It is implied that it is the Fiscal Year in which the records were created or received)
- Cut off at the end of the fiscal year received.
- Cut off when training is completed.

Note that end of year cutoffs were more common for paper records where records disposition would occur once a year. You can apply these types of cutoffs in automated systems, but more often a machine-implementable disposition instruction will use only an event because of the complexity of coding cutoff based both on an event and the year that event occurred.

Implied cutoff instructions are included as part of the retention or transfer instruction. Rather than specifying a cutoff event, the cutoff event is part of the instruction. Examples of implied cutoff instructions:

- Destroy when superseded or obsolete. (The implied cutoff is when the records are superseded or obsolete.)
- Transfer 15 years after case is closed. (The implied cutoff is when the case is closed.)

Specific cutoff instructions tend to be more clear than implied cutoff instructions. Use specific cutoff instructions if your users struggle to understand when to cut off records.

A good cutoff instruction is the foundation of an implementable disposition instruction.

Cutoff instructions should:

- Be clear and straightforward. Anyone should be able to tell when the retention or transfer period starts for a record, including a computer application.
- Event-based instructions should be specific. Use a specific event in the records workflow.
- Use "Destroy when no longer needed" sparingly. This type of instruction requires that someone determine that the record is no longer needed.
- When selecting a cutoff for aggregated items, be careful that the cutoff makes sense for all records covered by the item. It is possible to define specific cutoffs for individual series in a crosswalk, but this defeats the purpose of an aggregated item.

Understanding how cutoff instructions work is important for implementing disposition. It is especially important for implementing automatic disposition. Cutoffs should be either age-based or event-based.

- **Age-based cutoffs** use the age of the record to determine when retention or transfer occurs. In this case, the implied cutoff is when the record is created or received. Automated systems can implement these instructions based on the date the record was created or received.
- **Event-based cutoffs** use an event to determine when retention or transfer occurs. The event might be a final action taken on the record or the record becoming superseded or obsolete. The event is usually when the record is no longer in active use. Automated systems can implement event-based instructions using metadata, such as when a case is closed, a specific date in a workflow, or last modified date.

See also the Guide to Machine-Implementable Disposition Instructions *for additional guidance.*

Options for Record Retention and Transfer Periods

ERA provides standardized options for both retention and transfer periods. Retention period is used for temporary records. Transfer instruction is used for permanent records. The retention or transfer period refers to how long records are retained once they are no longer needed for active use before they are transferred to NARA or destroyed. This period of time starts with an event. The event could be the creation or receipt of a record. This is common for records that have immediate and short term use. The event can also be at the end of the record's active use, such as when a case is closed or the record is superseded or obsolete. See Cutoff Instructions for more information on these events.

Retention periods and transfer instructions are typically expressed in years. Some disposition instructions say to transfer permanent records in blocks. See Transfer Period Timeframes for more information on blocking instructions.

Try to use the standardized options in ERA for retention periods and transfer events. Avoid the use of "Other."

Transfer Period Timeframes

For permanent records, the standard transfer period is between 15 and 30 years after cutoff, whatever cutoff might be. Transfer of permanent records should only occur when:

- The agency's business has ceased
- The passage of time has lessened the sensitivity of the records.

Sometimes it may be appropriate to transfer permanent records in blocks. An example of a disposition instruction that uses blocking is: "*Transfer 15 years after cutoff in 5 year blocks.*"

A block is a chronological grouping of records in the same series. The blocking instruction indicates the frequency of transfer and the date range expected in a transfer. Using the example above, an agency would transfer records every 5 years. Each transfer would contain 5 years of records. An agency would transfer the records 15 years after cutting off the last records in the block. Blocking is most often used when the annual volume of records is small and it is more cost effective to transfer records from multiple years together at once.

Agencies may need to keep certain unclassified records longer than 30 years to meet their business needs. These include personnel files, law enforcement files, and files governed by specific statutes. NARA usually does not approve transfer of security classified records earlier than 25 years. We do this to align with mandatory declassification review requirements.

Agencies must provide additional information to request early or late transfer of permanent records to NARA:

- Complete the [Checklist for Proposing the Early Legal Transfer](#) of Permanent Records when proposing to transfer unclassified records that are less than 15 years old or security classified records that are less than 25 years old.
- Complete the [Checklist for Proposing the Late Legal Transfer](#) of Permanent Records when proposing to transfer records to NARA more than 30 years after cutoff or when the records are more than 30 years old, if transfer is based on the age of the record.

Agencies must provide the completed checklist with the proposed new schedule. These checklists help us determine if earlier or later legal transfer dates are appropriate. Submitting a checklist does not guarantee that we will approve the proposed schedule.

For more information see:
[NARA Bulletin 2020-02: Guidance on Scheduling the Early and Late Transfer of Permanent Records](#)

Flexible Retention Periods (Retention Bands)

Flexible retention periods, or retention bands, are an option available when scheduling temporary records.

A flexible retention period allows an agency to choose a retention period within stated parameters for temporary records. The retention parameters are known as the retention band. Flexible retention periods may be applied to both aggregate schedule items and traditional granular schedule items.

Examples of flexible retention periods

There are four principal types of flexible retention periods for temporary records:

- Time band with **minimum and maximum retention**. Example: "Destroy when no less than 3 years old and no more than 6 years old." Time bands should be meaningful and reasonable. A time band spanning more than a few years may result in significant inconsistencies across the agency, incurring legal risk.

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- **Minimum retention**, with longer retention permitted. Example: "Destroy when 5 years old. Longer retention is authorized if still needed for business purposes." Do not use this type of retention for records that contain personal privacy information. An open ended retention could result in keeping information longer than allowed by the Privacy Act.
- **Maximum retention**, with earlier destruction permitted. Example: "Destroy when 5 years old. Earlier disposal is authorized if no longer needed for business purposes." Do not use this type of retention for records needed for protection of legal rights or for ensuring government accountability. This type of retention can result in premature disposal of the records. Consult your General Counsel before proposing this type of retention band to ensure it is appropriate for the records. This is the least common type of retention band.
- **Retention until no longer needed**. Example: "Destroy when no longer needed for business reasons." Do not use this retention for records needed to protect legal rights, for ensuring government accountability, or for records that contain personal privacy information. Use this type of instruction sparingly and only when there is little to no risk in destroying records immediately. Agencies should consider whether the records are in fact transitory, in which case they could use the GRS instead.

Implementation of Flexible Retention Periods

Agency records management programs are responsible for consistent application of flexible retentions throughout their agency. Agencies should establish internal policies for how they will use flexible retentions. Inconsistent records disposition can open an agency to legal risk. An agency may use a schedule item with a flexible retention period in the following ways:

- The agency may set different retention periods for records held in different offices. This applies whether the item is for a single series or is an aggregate item.
- For aggregate items, the agency may establish different retention periods for individual series within the aggregate item.
- Individual series within an aggregate item can have different retentions based on the office that holds the records.

In all the above options, the retention period selected must fall within the stated parameters of the schedule item.

Additional Considerations for Flexible Retentions

Apply flexible retention periods consistently across your agency for certain records. Consistent retention is necessary for records such as:

- Records with legal rights implications
- Records likely to be requested under the Freedom of Information Act
- Records likely to be subject to discovery in litigation
- Records that contain personal privacy information.

Your agency may still use flexible retentions for these records. Just make sure that retention is applied consistently.

- **Record retention should be consistent at the office level, at minimum.** Do not allow individual staff members to establish retention periods for their own records. This includes records covered by General Records Schedules, which often allow for longer retention periods. Agencies should establish common set retention periods for their records at least at the office level. Only use the disposition "Destroy when no longer needed for business reasons" when there is minimal risk associated with retaining records for shorter or longer periods than necessary.

- **Records management applications need fixed record retentions.** Establishing set retention periods for records is necessary for automated records management. Records management applications need a single retention period associated with the records to calculate disposition. An agency that allows for different retentions in different offices may find it necessary to repeat disposition authorities in their system to accommodate the different retention periods. See the [Guide to Machine-Implementable Disposition Instructions](#) for more information.

Machine-Implementable Disposition Instructions

Machine-implementable disposition instructions allow a computer application to implement record disposition. Systems can automate disposition either by automatically disposing of records or by notifying a records manager that records are eligible for destruction or transfer to NARA. For more information on how to write machine-implementable disposition instructions, see the [Guide to Machine-Implementable Disposition Instructions](#).

Creating the Records Schedule

Agencies submit schedules to NARA via the Electronic Records Archives (ERA).

The ERA Training Materials provide instructions on creating a schedule in ERA.

Agencies can use the ERA 2.0 Schedule Data Entry Tool to collect and prepare information for entry into ERA. The tool explains what information should go into each field in the records schedule.

Job Aids:
Best Practices for Writing Descriptions
Dos and Don'ts of Records Scheduling
Records Schedule Quality Control Checklist

OBTAINING INTERNAL CLEARANCES AND EXTERNAL APPROVALS

You may need clearances and approvals before submitting a records schedule to NARA.

Internal Clearances

Program offices should review the draft records schedule that their office will use. Internal clearances help avoid the need to resubmit records schedules.

Questions to ask during internal review:

- Are any records missing? (Other than records covered by a General Records Schedule)
- Are the descriptions clear and accurate?
- Do the retention periods meet business needs?
- Are cutoff and transfer instructions clear and implementable?

Resolve any concerns about the schedule before submission to NARA. NARA staff may ask to meet with program offices during the appraisal process.

Other potential reviewers

Agency Records Officers may also seek internal review from other offices when needed.

- Agency historian
- Information Technology
- Chief Information Office / Chief Data Officer
- Legal counsel - especially when records involve legal rights

GAO's Approval

Authority: [36 CFR 1225.20](#)

The General Accountability Office (GAO) requires agencies to get their approval when deviating from the GRS for accountable officer records.

Accountable officer records are covered by GRS 1.1, item 010. NARA will generally not approve deviations to this GRS, however, if GAO concurs, you may request a GRS deviation through the records scheduling process. Documentation of GAO's concurrence will be required. See [Requesting GRS Deviations](#) for more information about that process.

How to request GAO Approval

Send requests for GAO approval to the GAO Records Officer. See the [Agency Records Officer Contact List](#) for current contact information.

You will select the status of GAO approval on each item of a proposed records schedule. It is not necessary to have GAO approval at schedule submission, as long as it has been requested. You must receive GAO approval before NARA can approve the schedule.

Contact your agency's assigned [NARA appraiser](#) for further help.

NARA APPRAISAL AND APPROVAL

Quick Links

[Scheduling and Appraisal Roles](#)

[The Appraisal process](#)
      [Submission and Acceptance](#)
      [Review](#)
      [Schedule Revisions](#)
      [Appraisal Meeting](#)
            [*Appraisal Meeting Checklist*](#)
            [Agency Responsibilities for Appraisal Meetings](#)
      [Appraisal Report](#)
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      [Approval](#)

[Withdrawal of an Approved Disposition Authority](#)

Agencies may not dispose of records without approval from the Archivist of the United States. Disposition for many common federal records is available from the General Records Schedules. Agencies must submit a Records Schedule to NARA for all other records.

It usually takes six months or less to process simple schedules. These tend to be schedules for clearly temporary records that do not have legal rights implications. A public comment process makes up roughly two months of this process. It may take up to one year or more for NARA to process large and complex schedules.

To ensure that NARA can process your schedule as quickly as possible:

- Review schedules to make sure that they are well-written with clear information about the content and the use of the records
- Be prepared to answer questions about the records
- Be prepared to schedule appraisal meetings for your appraiser with relevant agency staff

Scheduling and Appraisal Roles

The Agency's Role

Agencies play an important role in the scheduling and appraisal process. They:

- Identify records to schedule
- Collect information about their records
- Describe record schedule items
- Propose record dispositions
- Recommend retention periods for temporary records
- Explain changes in retention periods for temporary records to the appraiser
- Submit the schedules that start the appraisal process

During the appraisal process, expect to do the following:

- Answer the appraiser's questions about the records
- Provide more information about the records
- Schedule appraisal meetings with relevant program staff and their NARA appraiser

The Appraiser's Role

Appraisal is the process by which NARA evaluates records to determine their final disposition. We identify records as either temporary (disposable) or permanent (archival).

The appraisal process can be complex and challenging. It requires an understanding of:

- The agency's functions
- The agencies practices, policies, and procedures
- The importance of records in documenting the actions of the federal government, or the value of records as evidence
- The importance of records in documenting historical memory and American society, or the value of records as information

NARA cannot preserve all records created by the federal government. We must be selective in what we appraise as permanent. The role of appraisal is to:

1. Ensure that important records are identified and preserved.
2. Avoid the unnecessary maintenance of too much documentation.

Our appraisal criteria for permanent records is described in [NARA's Appraisal Policy](#).

The appraiser will shepherd the records schedule through the appraisal process. This process includes internal review and, for temporary records, a public comment process. The appraiser also prepares a memo for the Archivist of the United States recommending, when appropriate, approval of the schedule.

Through the appraisal process, appraisers:

- Review the schedule to make sure that it is clear and implementable
- Work with the agency to make sure that retention periods meet the agency's needs and are not excessive
- Verify the disposition of records to make sure that records with archival value are scheduled as permanent
- Work with the agency to make sure that transfer timeframes for permanent records meet both the agency's and NARA's needs

The Appraisal process

Submission and Acceptance

Agencies submit records schedules through the Electronic Records Archive (ERA) system. A [NARA appraiser](#) assigned to an agency receives the schedule in the system. The appraiser reviews the schedule for acceptance.

See the section Scheduling Records for more guidance.

See the [ERA Agency User Manual](#) for detailed instructions on creating a schedule in ERA.

NARA will return schedules without action if they do not meet the standards specified in [36 CFR 1225](#).

NARA may need additional documentation before we can accept the schedule:

- Big bucket items must include a crosswalk
- Agencies requesting to transfer permanent records earlier than 15 years or later than 30 years must submit a form. See [NARA Bulletin 2020-02: Guidance on Scheduling the Early and Late Transfer of Permanent Records](#) for information and the forms.

If the appraiser accepts the schedule, they begin the review and approval process outlined below.

If the appraiser returns the schedule without action, the appraiser will explain what is necessary for resubmission.

Job aid: Records Schedule Quality Control Checklist

Review

The amount of time it takes to review a schedule depends on factors such as:

- The size, scope and complexity of the schedule
- The quality of the schedule and number of revisions needed
- How many separate agency offices the appraiser needs to meet with
- How quickly the agency can arrange appraisal meetings
- How quickly the agency responds to the appraiser's questions
- The appraiser's workload
- Comments received during the public comment process

Appraisers review schedules to:

- Determine if proposed disposition instructions are appropriate, especially when legal rights are involved
- To ensure records proposed as permanent warrant preservation
- To ensure records proposed as temporary lack archival value

Appraisers also send schedules to internal NARA stakeholder units for review. These stakeholders include archival custody unit staff and the Federal Record Center Program. Stakeholders may ask questions about the records. They may also comment on disposition, retention periods, and transfer time frames. Stakeholders also have the opportunity to take part in appraisal meetings.

Schedule Revisions

At any time during the appraisal process an appraiser may ask the agency to revise the schedule. The appraiser will document any requested changes in communications with the agency. Agencies are usually expected to make revisions to the schedule using ERA to document changes in the ERA system.

Revisions may stem from:

- The appraiser's review of the schedule
- Input received from other NARA units
- Comments from the public

Revisions can be made to any element of a record schedule except the agency name and Record Group. Items can also be removed or added, if needed. Most schedule revisions are to:

- Item descriptions
- Item dispositions
- Record retentions or transfer periods

Schedules are only modified by agreement between NARA and the agency.

Appraisal Meeting

Appraisers review records schedules to determine if the proposed disposition instructions are appropriate. This may involve an appraisal meeting.

The appraiser may ask to meet either in person, virtually, or on the phone. The purpose of this meetings may be to:

- Gain a better understanding of agency business processes associated with the records
- Look at examples of records
- Ask the rationale behind a proposed disposition instruction
- Discuss how the agency will carry out a proposed transfer instruction
- Answer agency questions

Agency records management staff are responsible for arranging appraisal meetings upon request. Depending on the size and complexity of the schedule, the appraiser may need multiple meetings.

The appraisal process can move more quickly when agencies are prompt in setting up appraisal meetings and answering questions.

Agency Responsibilities for Appraisal Meetings

[Appraisal Meeting Checklist](#)

Before the appraisal meeting:
- Review and be prepared to answer [Common Appraisal Questions](#)
- Request information from your appraiser about:
    - Any specific questions they have
    - What records they want to review
    - What offices they want to meet with
- Identify program staff to include in the meeting
    - Consult your appraiser about possible attendees
    - Collect contact information for follow-up questions
- Know where the records are kept and arrange for access
- Know what formats the records are in
- Identify any possible access issues

For virtual appraisal meetings:
Work with your [NARA appraiser](#) to decide if a virtual appraisal visit is appropriate.

Virtual appraisal meetings are appropriate when:
- When records are best viewed through system demonstrations
- When the appraiser can review records in a virtual environment
- Program staff are in different locations

Virtual appraisal meetings are not appropriate when:
- Records are fragile or unique analog formats or otherwise difficult to duplicate. This includes records such as oversized maps and glass plate negatives etc.
- Records are classified.

Identify a mutually-acceptable audio and video conferencing software that:
- Can share the screen to provide access to digital content in real time; and
- Offer multiple means of communication such as video conferencing, telephone, and chat features.

Arrange access to records in all formats and create a representative sampling.
- Ask your appraiser what records they will want to see.
- Be prepared to share records with all meeting participants during or in advance of the meeting.
    - You may need to digitize sample sets of analog records.

- You may need to arrange for a virtual demo of an information system.
- You may need to provide examples of electronic records from an information system.

Once the meeting dates are set:
- Send meeting location and time to all participants
  - Include building access instructions for in-person meetings
- Work with your appraiser to develop an agenda for the meeting
- Make sure you have shared the proposed records schedule with all attendees

After the meeting:
- Arrange follow-up meetings as needed
- Answer follow-up questions from the appraiser
- Follow-up on requested schedule revisions, if needed
- The appraiser will return your schedule in ERA for you to make the revisions

Appraisal Report

When the appraiser has answers to all questions and all revisions are complete, the appraiser prepares an appraisal report. This report:

- Provides any additional information necessary to understand the records or how the agency uses them
- Explains why the proposed disposition of the records is appropriate
- Discusses any changes in retention for the records (if they were previously scheduled) and why the retention for temporary records is appropriate

Some appraisal memos outline changes the agency must make to the schedule before approval. This happens in situations where the agency has not already made requested revisions.

Other NARA offices review and comment on these reports and the schedules to which they relate.

Public Comment

Law requires that NARA publish notice in the Federal Register of schedules that propose:
- Disposal of unscheduled records
- A reduction in the retention period of records previously scheduled as temporary

These notices give the public an opportunity to see proposed schedules and comment on them. The public has 45 days from the date of publication to provide comments. Public input brings a non-governmental perspective to the appraisal process. Federal Register notices are available at regulations.gov.

Responding to Public Comments

NARA considers all public comments submitted by the posted deadline. If needed, the appraiser will consult with the agency to resolve comments. After considering comments, we will post a "Consolidated Reply" on regulations.gov. The Consolidated Reply summarizes and responds to the comments. It will also explain any changes we made to the proposed records schedule. You may elect to receive updates on the docket at regulations.gov.

Approval

After completion of the public comment process, the appraiser prepares the schedule for approval. The appraiser ensures the appraisal process is documented in ERA as part of the appraisal "dossier." NARA preserves appraisal dossiers as a permanent record. NARA managers in the Office of the Chief Records Officer review the dossier before sending it to the Archivist of the United States for approval. After the Archivist approves the schedule it is available to the agency in ERA. NARA also posts a copy of the approved records schedule to the online Records Control Schedule (RCS) repository.

Withdrawal of an Approved Disposition Authority

Authority: 36 CFR 1226.16

NARA rescinds a disposition authority when destruction of the records would harm government interests or individual rights.

This is also known as rescinding an item.

NARA notifies agencies when disposition items are rescinded:

- NARA will issue a bulletin if the withdrawal affects more than one agency.
- For temporary withdrawals, NARA will notify agencies when to resume applying the normal retention periods.
- NARA will issue further instructions for longer-lasting withdrawals.

IMPLEMENTING SCHEDULES

> **Quick Links**
>
> [Issuing New Records Schedules](#)
> [Steps for Issuing New Schedules](#)
> [Applying Schedules](#)

Issuing New Records Schedules

NARA-approved records disposition authorities are mandatory. This includes both approved agency records schedules and the General Records Schedules. Agencies must issue records schedules within six months of NARA approval. (See [36 CFR 1226.12(a)](#).).

The purpose of a records disposition issuance is to provide instructions for managing agency records and non-record materials. The issuance includes all instructions that agency staff will need to manage their records.

Your agency may also use a records management directive to issue new records schedules.

Do not rely on copies of approved records schedules alone for your issuances. Agency records schedules only include agency records. They do not include records covered by the General Records Schedules or non-record materials. They also do not include filing instructions which tell agency staff what to do with certain types of records.

Your records disposition issuance should include:

- Approved agency disposition authorities
- Any General Records Schedule disposition authorities that your agency uses
- Instructions for handling of non-record materials
- Filing instructions, when needed
- Any agency and Privacy Act restrictions for records

Steps for Issuing New Schedules

- **Identify superseded or obsolete authorities.** Superseded authorities appear on the approved records schedule. Your agency should identify any obsolete authorities during the inventorying process. Check for filing instructions and instructions for non-record materials that are obsolete.
- **Update your records disposition manual or records management applications.** Update items with the new disposition authority citation. Add newly scheduled items. Remove obsolete items.
- **Disseminate updates.** Notify staff that there have been changes in records disposition requirements. Some agencies use internal directives for this purpose.
- **Update office or program file plans.** If your agency uses a records management system, it may not need file plans. However, if agency staff need guidance on how to dispose of their records, file plans are a good option.
- **Train staff on how to use the new schedules.** Agency records management programs are responsible for training staff how to manage their records.

See [Implementing New GRS Transmittals](#) for further information on steps to take when NARA issues new or revised GRS.

Dissemination

Share your records disposition issuance with agency staff. This includes at least the following:

- All staff officials
- All office, bureau, division, and branch heads
- All custodians of major record holdings, including system managers and Information Technology staff
- All records management liaison officers

File Plans

File plans are another tool your agency may use to aid staff in managing agency records. While your agency records disposition manual or recordkeeping system covers all of your agency's records, file plans typically apply to only one office or program. They only include instructions for the records created and maintained by the office or program.

The purpose of a file plan is to provide a succinct reference tool for staff. They provide staff with a limited set of disposition instructions for only the records that staff need to manage.

File plans are a best practice for most agencies. The only time your agency may not need a file plan is when your agency only has electronic records and an automated electronic recordkeeping system that manages records for agency users.

Creating or Updating File Plans

File plans tell agency staff how to dispose of their records. The file plan should contain up-to-date and accurate disposition authorities for all records. It should also include instructions for handling non-record materials held in an office or program.

Take these steps when creating or updating file plans:

1. Review the office's or program's functions.
2. Consult a current inventory of the office's or program's records.
3. Match the records identified in the inventory to those described in the schedule. Alert the records manager to any unscheduled records.
4. Develop a file plan.

A file plan usually includes the following information:

- Office or program name
- Name and contact information of the preparer (usually the records liaison)
- Date
- Any reviewers or approvers
- Identifier (this might be a file code)
- Series or system title
- Series or system description (if needed)
- Records location (optional)
- Disposition instructions
- Disposition authority

See also: [Creating and Using File Plans (video).](#)

File plans are especially important if your agency uses aggregate item schedules. Agency staff may struggle to apply aggregate item schedules without file plans or other tools that identify which series each aggregate item contains.

For more information on implementing aggregate item schedules, see the [Guide to Aggregate Item Schedules](#).

Training Employees

Agency records management programs should train all agency employees about how to use records schedules. Some positions may need more training, including:

- Records liaisons
- System owners
- Anyone responsible for the final disposition of records

Even if your agency manages records using an automated records management application, you may need to train staff on how to file or tag their records.

Employee training is especially important for aggregate item schedules. These schedules often need extra training so that staff understand which records go into each item. File plans are also a necessary tool for applying aggregate item schedules.

Consider developing a communication and training plan to inform agency staff about new schedules.

See the [Records Management Training Program website](#) for more training resources.

Applying Schedules

General Guidelines

Disposition authorities apply to all existing records described in the schedule unless the schedule specifies otherwise. If you want a new records schedule to only apply to day forward records, the schedule must specify the date when coverage begins.

If two disposition authorities cover the same records or system the more recent authority applies.

New or revised General Records Schedules (GRS) items supersede agency records schedule items unless the agency obtains NARA's approval.

- To continue using an existing agency schedule superseded by a new GRS, see [Submitting GRS Notifications](#).
- To request a new disposition item instead of using the GRS, see [Requesting GRS Deviations](#).

Take these actions when applying the schedule:

- Avoid filing unnecessary materials, such as extra copies in the same series
- Cut off, or break, files regularly

- Promptly destroy temporary records when their retention periods expire
- Care for permanent records until their timely transfer to the National Archives.

If at any time your agency finds that a disposition authority isn't meeting its needs, submit a new schedule.

For additional information on implementing aggregate item schedules, see the [Guide to Aggregate Item Schedules](#).

Applying the Schedule to Permanent Records

Permanent records have enough historical or other value to warrant permanent preservation. Your agency may not destroy these records. You must transfer the records to NARA, unless another arrangement is in place. See [Other Records Disposition Scenarios](#) for other potential arrangements.

Your agency must give special attention to permanent records and transfer them to NARA in accordance with the schedule's instructions and with NARA regulations and guidance.

Other resources:
[Agency Permanent Records Guidance and Information](#)

Transferring Permanent Records to the National Archives

Agencies typically transfer permanent records to NARA after a retention of between 15 and 30 years. Retention periods start either when the records were created or received (age-based) or when a specific event occurs (event-based). For more information see [Cutoff Instructions](#).

Some disposition instructions say to transfer permanent records in blocks. An example of a disposition instruction that uses blocking is: *Transfer 15 years after cutoff in 5 year blocks.*

A block is a chronological grouping of records in the same series. The blocking instruction indicates the frequency of transfer and the date range expected in a transfer. Using the example above, an agency would transfer records every 5 years. Each transfer would contain 5 years of records. An agency would transfer the records 15 years after cutting off the last records in the block.

Your agency must get written approval from NARA to keep permanent records that are eligible for transfer.

Your agency may transfer permanent records to NARA earlier if your agency no longer needs them and if there are no proposed restrictions on their use.

NARA accepts legal custody of the records when NARA changes the status of Transfer Request (TR) in ERA 2.0 to "Custody Accepted."

For more details about transferring records to NARA, see:
- [Guidance and Policy for Accessioning Records to the National Archives in the Washington, DC Area](#)
- [Folder Title List: Transferring Your Permanent Paper Records (Video)](#)
- [Access Restrictions: Their Importance and Impact on the Transfer of Permanent Records to NARA (Video)](#)

Applying the Schedule to Temporary Records

Temporary records are disposable, or nonpermanent. Temporary records are either destroyed or donated. Your agency may only destroy records based on an approved agency schedule or the GRS. Your agency should dispose of temporary records promptly when the schedule says to do so.

NARA-approved retention periods for temporary records are normally mandatory, but there are exceptions. These exceptions include:

- Transferring records to another agency
- Donating temporary records
- Temporarily extending temporary retention periods
- Requesting emergency destruction

See the section [Other Records Disposition Scenarios](#) for more information.

Destruction of Temporary Records

See [36 CFR 1226.24](#) for more information on how to destroy temporary records.

Culling Records

In records disposition, culling means removing documents of short-term value or that are non-record or personal materials. Culling is typically used when these types of records or materials are mixed in a series with long-term temporary or permanent records.

Your agency may not destroy culled federal records without a disposition authority.

The decision to cull requires rigorous analysis because of the cost involved. The amount of time and money spent depends on whether:

- It is easy to identify the materials to be removed
- The records are easily accessible

Culling is no substitute for following proper filing procedures. Culling of electronic records may be appropriate if records are not organized into series by disposition authority. To avoid culling, make sure that permanent or long-term records are not intermixed with short-term records or with nonrecord materials.

For more information about culling email managed using a Capstone approach, see these [Frequently Asked Questions about Culling](#). See also [Frequently Asked Questions about Transitory Records in Electronic Messages](#).

Other Records Disposition Scenarios

Transferring Records to Other Agencies

Agencies may transfer records to another executive agency with NARA's approval. (See [36 CFR 1231](#).)

NARA's approval is unnecessary when:

- Statute, Executive order, Presidential reorganization plan, or treaty requires the transfer
- When an agency transfers records to records centers for storage or the National Archives
- When the records are lent for official use
- When the transfer is between two parts of the same Executive department

Send the following information to NARA to request approval to transfer records to another agency:

- A concise description of the records, including inclusive dates and the volume
- Any access restrictions, including those placed on classified information
- The agencies and persons who will use the records and the purpose of this use
- The current and proposed storage locations of the records
- Justification of the proposed transfer, including an explanation about why it is in the best interests of the federal government.
- Copies of concurrences from the receiving agency

The request must come from the head of your agency. Email this information to rm.communications@nara.gov.

Donating Temporary Records

Agencies may donate temporary records to an eligible person or organization with NARA's approval. *See also 36 CFR 1226.26*.

To get approval to donate temporary records, send a request with the following information:

- The name of the department or agency
- The office or program that has custody of the records
- The name and address of the proposed recipient of the records
- A list identifying by series or system the records
- The inclusive dates of each record series or system
- The disposition authority authorizing disposal of the records for each series or system
- Evidence that:
    - The proposed transfer is in the best interests of the government
    - The proposed recipient agrees not to sell the records
    - The transfer will cost the government nothing
- Certification that
    - The records do not contain information that cannot be disclosed by law or that is contrary to the public interest
    - Any records donated to a person or business relate directly to the custody or operation of property acquired from the government, and/or
    - Any foreign government desiring the records has an official interest in them

Email this information to rm.communications@nara.gov.

NARA will review the request and determine whether the donation is in the public interest. NARA will notify your agency in writing of its approval or disapproval. If NARA disapproves, the agency must destroy the records according to the existing disposition authority.

Temporarily Extending Retention of Temporary Records

Agencies may extend the retention of temporary records beyond the NARA-approved retention in special circumstances. Common situations requiring extension of retention include program audits, litigation and investigations. *See also [36 CFR 1226.18](#) and [1226.20](#).*

NARA does not need to approve temporary extension of retention periods when ordered by a court. Agencies must notify NARA of the extension within 30 days after issuance of the court order. Include the same information required in an extension request along with a copy of the court order.

Agencies may request a temporary extension by sending NARA a request that includes:

- A concise description of the records
- The disposition authority for the records (job number and item number)
- The current and proposed location of the records
- The estimated length of the extension

Email this information to rm.communications@nara.gov.

NARA will issue a bulletin when it approves an extension for records common to several or all agencies. NARA will notify the affected agencies when the extension expires.

If your agency wants to extend retention for longer than one year or make a lasting change to a retention period, submit a schedule to NARA.

Requesting Emergency Destruction of Records

Under certain conditions, agencies may destroy records regardless of schedule provisions. Such conditions involve:

- **Records outside the territorial limits of the continental United States when war or other hostile action exists or threatens.** The agency head may allow the destruction of such records when:
    - They pose harm to U.S. interests, or
    - There is an urgent space need for military operations and the records lack administrative, legal, research, or other value to warrant continued preservation (44 U.S.C. 3311)
    - **When this occurs.** Within 6 months of destruction, the responsible agency official must send NARA a statement describing the records and explaining when and where they were destroyed.

- **Records whose physical condition makes them a menace to human health or life and to property.** They may be vermin-infested or may be stored under such adverse conditions that they cannot be used or repaired.
    - **When this occurs:** Your agency records officer must get written approval from NARA to destroy the records. See [36 CFR 1229.10](). The request must describe the records, their location and quantity, and the nature of the menace.

Email this information to [rm.communications@nara.gov]().

UPDATING SCHEDULES

Quick Links

[Records Disposition Change Recommendation Form](#)
[Reviewing Existing Schedules](#)
[When New Schedules Are Required](#)
[Identifying New Records](#)
[Implementing New GRS Transmittals](#)
[How to Update Schedules](#)

Agencies are responsible for maintaining accurate and up-to-date records dispositions. This means:
- Reviewing existing schedules at regular intervals to make sure they still meet agency needs
- Updating schedules when required
- Identifying and scheduling new records
- Implementing new GRS Transmittals

Provide a way for agency staff to suggest changes to record schedules, such as using a form like the [Records Disposition Change Recommendation Form](#).

Reviewing Existing Schedules

NARA regulations require that agencies review all records schedules that are ten years old and older every five years. The age of the record schedule is based on the schedule's approval date. Agencies may also review their records schedules more often. (See [36 CFR 1225.22(a)](#).) During review, see if there are schedule items that your agency needs to revise or update.

[How to Use the RCS to Review Agency Schedules: Instructions](#)
[How to Use the RCS to Review Agency Schedules: Job Aid](#)
[Inactive Item Reporting Form](#)

Identifying Schedule Revisions

Talk to record custodians to see how schedule items are working. If your agency has automated recordkeeping, make sure that records are correctly assigned to schedule items and that disposition is taking place as expected.

Schedule items need revision when:

- **Descriptions are not clear.** If file custodians cannot match schedule items to their records, you need to revise item descriptions.
- **Disposition instructions cannot be implemented.** Do the file custodians understand the cutoff instruction for the records? Is the cutoff instruction appropriate for the records? Is it being correctly implemented? If you have automated disposition, is your recordkeeping system working as expected?
- **Retention periods are too long or too short.** Sometimes your agency may not have a good sense of how long to keep records when they are first scheduled. Existing retentions might end up being too long or too short. Remember that it is in your agency's best interest to only keep temporary records as long as needed. NARA recommends starting your review with items with retention periods longer than 10 years. Make sure that these record retentions are still appropriate. Pay special attention to records with retention set out by statute or regulation. If the statute or regulation changes, your agency may need to revise the record's retention.

If you need to revise your agency's records schedules, follow the guidance above on when new records schedules are required. Typically, you will need to submit a new schedule to NARA for most changes.

Obsolete Items

Schedule items become obsolete when the records are no longer accumulated by the agency. Once your agency has dispositioned all existing records the schedule item is no longer needed.

Reasons schedule items may become obsolete:

- The processes that led to the creation or receipt of records change.
- The program is terminated.
- The function is transferred to another agency.

Before identifying an item as obsolete, make sure that your agency has destroyed or transferred all records covered by the item. That includes records in record storage facilities or the Federal Records Centers.

Reporting Obsolete or Inactive Items to NARA

You can report obsolete or inactive items to NARA using the [Inactive Item Reporting Form](). You may send reporting forms to your agency's appraiser or to [LSSP_Team@nara.gov]().

Non-record Materials and Filing Instructions

While reviewing older schedules you may find items that cover non-record materials or filing instructions. You can keep these types of items in your internal recordkeeping manuals or systems, but they are not disposition authorities. You should report these items to NARA so that we can identify potential inactive schedules.

When New Schedules Are Required

See also [36 CFR 1225.22]().

Agencies must submit a new schedule when:

- **There is an interagency reorganization**. Schedules approved for one department or independent agency do not apply to the records of other departments or agencies. Agencies that take over a function for another agency must submit a new records schedule to NARA within one year.
- **Deviating from retention periods in the GRS.** Many GRS items allow for longer retention. Agencies can set a longer retention for records covered by those GRS items without NARA approval. Otherwise, agencies must submit schedules requesting a GRS deviation. See [Requesting GRS Deviations]() for more information.
- **Changing retention periods for previously scheduled records.**
- **Change the approved disposition of records from permanent to temporary or vice versa.**
- **Modifying the description of records.** Revisions related to the informational content or the function of the records need a new schedule. This is especially important when records move from an analog to a digital format.
- **Changing the aggregation of series covered by a schedule item.** Your agency must submit a new schedule to aggregate already scheduled series or to break up an aggregate item. You do not need to submit a schedule to aggregate records covered by GRS items, provided the GRS applies to all records covered by the item. See the [Guide to Aggregate Item Schedules]() for more information on updating such items.

- **Making records scheduled as temporary media neutral.** Records schedules approved before December 2007 that do not say they are media neutral are media specific. Agencies wanting to apply these authorities to records in other formats must reschedule the records.
- **The records schedule specifically excludes electronic records and the records are now digital.** Some schedules will say that they do not apply to electronic records. Your agency cannot use these schedules for digital versions of the records.
- **Digital versions of records maintained on an agency website.** Your agency cannot apply schedules for agency records to versions on agency websites. Agencies must schedule the content of websites as its own record type.
- **Digitized records do not meet NARA digitization standards.** See Digitization of Federal Records for more information.
- **Source records that are not covered by the GRS.** GRS 4.5 provides disposition authority for source records, but there are exclusions. See GRS 4.5 and its related FAQ for more information.

Other changes in an agency that may lead to schedule revisions include:

- Changes in legislation or program regulations
- Changes in program priorities, policies, procedures, or information flow
- Discontinued programs and responsibilities
- New programs and responsibilities
- Automation of work processes, such as moving from paper-based to electronic systems
- Internal reorganizations affecting the nature, content, and importance of existing records

New schedules are not required when:

- **Temporarily extending the retention of temporary records.** See 36 CFR 1226.18 or the section Temporarily Extending Retention of Temporary Records for further instructions.
- **Changing the transfer period for permanent records.** Agencies may request changes to transfer period for a single accession. Contact your agency's appraiser or email RM.Communications@nara.gov. If your agency needs to change the transfer period for all records covered by an item, submit a new record schedule to NARA. (36 CFR 1225.26(d))

Identifying New Records

Submit record schedules as soon as possible after identifying unscheduled records. Ways to identify new records include:

- **Through the inventorying process.** See *Knowing Your Records* for more information on inventorying your records.
- **Agency staff.** Consider giving agency staff a way to report when they have new records series or systems. For example, use the Records Disposition Change Recommendation Form.
- **Information technology or data management divisions.** These programs need to know what systems and data the agency maintains. Consider setting up a process that allows these programs to inform the records management program when they have new systems or data. They can also provide more information to help with the scheduling process.

Implementing New GRS Transmittals

Agencies must also review their schedules when NARA issues a new or revised General Records Schedule (GRS). Agencies have six months after NARA issues a new or revised GRS to implement the GRS. Agencies have 120 days to notify NARA if they want to use existing agency authorities instead of an applicable new or revised GRS. See the Implementing GRS Transmittals for more information. *See also 35 CFR 1227.*

Agency records that can be covered by a new or revised GRS are automatically superseded by the GRS unless the agency submits a notification within the 120-day time period after GRS issuance. See Submitting GRS Notifications for more information.

How to Update Schedules

A new schedule is required to update an existing schedule. Follow the instructions for Creating the Records Schedule and refer to Scheduling Records as needed.

When rescheduling previously approved disposition items:

- List any superseded schedule items.
- State whether the superseded item is superseded fully or in part.

Be prepared to explain to your appraiser why the records are being rescheduled. If the record retention is changing, your appraiser will want to know why.

For information on updating aggregate item schedules, see the [Guide to Aggregate Item Schedules](#).