

<b>REQUEST FOR RECORDS DISPOSITION AUTHORITY</b> (See Instructions on reverse)		LEAVE BLANK (NARA use only)	
TO: NATIONAL ARCHIVES and RECORDS ADMINISTRATION (NIR) WASHINGTON, DC 20408		JOB NUMBER N1-378-93-1	DATE RECEIVED 2/26/93
1. FROM (Agency or establishment) Economic Development Administration		NOTIFICATION TO AGENCY	
2. MAJOR SUBDIVISION Deputy Assistant Secretary for Grant Programs		In accordance with the provisions of 44 U.S.C. 3303a the disposition request, including amendments, is approved except for items that may be marked "disposition not approved" or "withdrawn" in column 10.	
3. MINOR SUBDIVISION			
4. NAME OF PERSON WITH WHOM TO CONFER Leon Douglas	5. TELEPHONE 482-2194	DATE 7-14-94	ARCHIVIST OF THE UNITED STATES WITHDRAWN

6. AGENCY CERTIFICATION  
I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal on the attached 1 page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified; and that written concurrence from the General Accounting Office, under the provisions of Title 8 of the GAO Manual for Guidance of Federal Agencies,

is not required;  is attached; or  has been requested.

DATE 2/22/93	SIGNATURE OF AGENCY REPRESENTATIVE <i>Daniel Rooney</i>	TITLE Department Records and Forms Management Officer
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7. ITEM NO.	8. DESCRIPTION OF ITEM AND PROPOSED DISPOSITION	9. GRS OR SUPERSEDED JOB CITATION	10. ACTION TAKEN (NARA USE ONLY)
1	<p>Deputy Assistant Secretary for Grant Programs</p> <p>EDA Public Works Project Case Files</p> <p>See attached for description of Office activities and the revision necessary to the EDA Record Schedule NC1-378-79-2.</p> <p>This supersedes Job No. N1-378-90-1, approved 8/7/90.</p>		WITHDRAWN

Public Works Approved Project Official Case Files. The official case file is maintained in the appropriate regional office and contains a copy of the application with all supporting documents, a copy of all administrative actions relating to the application or to the approved project, copies of all pre-approval review actions, certification requirements, post approval reports, and related planning and construction papers.

A. Case files that were retired to FARC prior to 1993. (Note: No future retirement of case files to FARC is authorized under this item.)

(1) Documentation not needed to protect government's rights and interest that exist 15 years after closure.

Destroy when 15 years old.

(2) Documentation needed to protect government's rights and interest that still exist 15 years after closure.

a. Hard copy of documentation: Destroy upon verification of microfilm. If documentation is not microfilmed, destroy when useful economic life of project has ended.

B. Case files retired to FARC beginning in 1993 and thereafter.

(1) Case files pertaining to projects with a useful economic life no greater than 15 years.

Destroy when 15 years old.

(2) Documentation needed to protect government's rights and interest that still exist 15 years after closure.

a. Hard copy of documentation: Destroy upon verification of microfilm. If documentation is not microfilmed, destroy when useful economic life of project has ended.

b. Microfilm of documentation: Destroy when useful economic life of project has ended.



## Federal Records Center—Philadelphia

5000 Wissabickon Avenue Philadelphia, Pennsylvania 19144

Date : November 13, 1992  
Reply to  
Attn of : 3NC  
Subject : Draft disposition instruction for N1-378-90-1-1A  
To : NC (Roley)

In reply to your memo of October 15, we have re-examined disposition job N1-378-90-1 and concluded that the problem is both simpler and more complex than our original memo indicated. Because of that, we have offered two solutions to the problems presented by the current schedule. Our reasoning and our solutions follow:

1. The Simple Solution: Initially, our concern was the failure of item 1A to provide clear instructions for the handling of the sample files and the remaining non-sampled records with which the sample is transferred to the FRC. Upon re-examination of typical files and the item itself, we have concluded that, overall, these records do not merit permanent retention. We fail to see that there is much research value in such records since there is no guarantee that they reflect a true picture of the agency's program in time or place, and even with carefully defined criteria for sampling, the records have questionable value. The files do reflect the grant selection process, especially the political aspects of selection (both Republican and Democratic senators wrote in support on one rather small project). There is also a fair amount of demographic data about the social and economic configuration of the area which EDA used to justify the grant. This data does exist in other formats, however, since it was compiled from census records and labor statistics. One case file every other year is insufficient to provide any meaningful body of information, however. Statistical summaries which include information concerning time, place, size and/or value of each project would offer more research value than this method.

Based on our conversations with personnel at several other FRCs, we believe our assessment of the value of the project case files is on target. One suggested that we should also urge EDA to reappraise several other series of records slated

for sampling in its schedule because, like the public work project case files, these other series have little or no secondary value and the sampling technique is illogical.

Our proposal for "curing" the defects of this schedule then is to eliminate item 1A and to rewrite 1B and 1C as disposable, with no reference to sampling.

2. The "Complex" Solution: As we noted in earlier correspondence, it appears that some of the files we accession are not clearly closed. In fact, it may well be that none are closed, based on the assumption that the government may have a financial interest in a public works project until the end of its useful economic life. We should schedule a case file for its eventual disposition based on the closing date of the case, either the date the project ceases to have any more useful economic life or the date the government recovers its financial interest. Unless the agency retains all of its files on-site there is no practical way of determining when those events will occur. Because of this contingency, it is difficult to identify the first case that closes in every even numbered year for records currently at the FRC, since most probably do not meet the final criteria for closing. The dates we have encoded in the NARS-5 series descriptions have no meaning for item 1A and, theoretically, all public works project files coming into an FRC should be scheduled under item 1A. Only after EDA has permanently closed a case for each even year in which the program has existed can we schedule any closed files for item 1B. By that time, since the files will now be finally closed, there will be little point in microfilming the records to preserve the government's rights and interests. Ditto any case files that close in odd numbered years - except, of course, that we can't reschedule them until we know that their final closure has occurred during an odd numbered year.

We need to examine the rationale behind the sampling required by item 1A, and either find a different basis for selection or discard the notion that a sample of these case files has secondary value which warrants its permanent retention. Based on the argument above, the retained samples do not provide a representative picture of the agency's public works projects program (i.e., as an example of "typical" projects or typical projects within each period of time the program has existed). This argument, of course, assumes that

the agency is attempting to preserve a sample for that purpose. Therefore, based on criteria established in consultation with NARA, each year or every other year, the agency should make a "selection" (not a "sample") of a representative case file which EDA wishes to preserve. This sample could then be microfilmed and the original sent to NARA. The remaining files could likewise be microfilmed and the paper versions destroyed. The microfilm, of course, could then be transferred to NARA.

For purposes of simplification, it seems to us that the best time to make the selection would be at the conclusion of the active phase of the project, but prior to the end of the useful economic life of the project, (i.e., at the point at which EDA determines that the records may be transferred to the FRC). This would be a logical time to determine whether the case files met the criteria EDA and NARA had established - either because the case was "typical" or "atypical" (depending on the criteria). At this point the issue of full versus partially filled boxes might come into play as we suggested in our August memo - not when the FRC transfers the records to the Archives. The process of making the selection at a later time would be cumbersome, since it would not come until the government recovered its financial interest or the project's useful economic life had ended. Someone would have to keep track of all those cases for many years and maintain a "scorecard" to determine that all requirements had been met. It is not inconceivable that we would then find several different cases in one accession which have final closing in odd or even numbered years.

Our own preference is for no sample at all as noted under our "Simple Solution" heading. If EDA insists on retaining a sample, we recommend a selection based on the criteria listed below. However, we believe that even this method has serious drawbacks, not the least of which is that we doubt the agency will adhere to the disposition standard and that selections, if any, will be infrequent.

Sampling Version:

Public Works Approved Project Official Case Files.  
The official case file is maintained in the appropriate regional office and contains a copy of the application with all supporting documents, a copy of all administrative actions relating to the

application or to the approved project, copies of all pre-approval review actions, certification requirements, post approval reports, and related planning and construction papers.

- A. Samples. Retain any case files which represent unusually significant projects completed during any fiscal year. "Significant" may refer to impact on community, value of project, notoriety or prominence of project or project participants, or uniqueness of project.

Permanent. Microfilm documentation needed to protect government rights and interest that will exist 15 years after closure and retain microfilm until eligible for destruction as directed in C(2)b below. Transfer hard copy to FRC no sooner than 1 year after project has been completed and offer to NARA 30 years after closure. N1-378-90-1-1A

The remaining items, B and C, could then stand as is.

Please note that we offer the second solution only if EDA rejects our simpler proposal to delete all references to sampling and retaining any of these case files. You may contact Elinor Aye at (215) 951-7451 if you have any questions regarding our proposal.

*David S. Weber*

DAVID S. WEBER  
Director