

REQUEST FOR RECORDS DISPOSITION AUTHORITY (See Instructions on reverse)		LEAVE BLANK (NARA use only)	
TO: NATIONAL ARCHIVES and RECORDS ADMINISTRATION (NIR) WASHINGTON, DC 20408		JOB NUMBER 101-48-99-1	
1. FROM (Agency or establishment) U.S. Department of the Interior		DATE RECEIVED 6-15-99	
2. MAJOR SUBDIVISION Office of Inspector General		NOTIFICATION TO AGENCY	
3. MINOR SUBDIVISION Division of Acquisition and Management Operations		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request, including amendments, is approved except for items that may be marked "disposition not approved" or "withdrawn" in column 10.	
4. NAME OF PERSON WITH WHOM TO CONFER	5. TELEPHONE	DATE	ARCHIVIST OF THE UNITED STATES
Richard A. Farr	(202) 208-4599		WITHDRAWN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	SIGNATURE OF AGENCY REPRESENTATIVE	TITLE
5-11-99	<i>Richard A. Farr</i>	Acting Chief, Division of Acquisition and Management Operations

7. ITEM NO.	8. DESCRIPTION OF ITEM AND PROPOSED DISPOSITION	9. GRS OR SUPERSEDED JOB CITATION	10. ACTION TAKEN (NARA USE ONLY)
1	Please accept the Office of Inspector General Records listed on the attached page.	GRS 22-1a & 1b	
2		GRS 22-2	

<u>ITEM NO.</u>	<u>INVESTIGATIVE CASE FILES</u>	<u>AUTHORIZED DISPOSITION</u>
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- |   |  |  |
|---|--|--|
| 1 | <p>Case files developed during investigations of known or alleged fraud, abuse, and irregularities or violations of laws and regulations, EXCLUDING those that result in national media attention, congressional Investigation, or substantive changes in agency policy or procedure. Cases relate to agency personnel and programs and operations administered or financed by the agency, including contractors and others having a relationship with the agency. This includes investigative files relating to employee and hotline complaints, and other miscellaneous complaint files. Files consist of investigative reports and related documents, such as correspondence, notes, attachments, and working papers.</p> |  |
|   | <p>a. Files containing information or allegations which are of an investigative nature but do not relate to a specific investigation. They include anonymous or vague allegations not warranting an investigation, matters referred to constituents or other agencies for handling, and support files providing general information which may prove useful in Inspector General investigations.</p>  | <p>Destroy when 5 years old</p>  |
|   | <p>b. All other investigative case files except those that are unusually significant for documenting major violations of criminal law or ethical standards by agency officials or others.</p>  | <p>Place in inactive files when case is closed. Cut off inactive file at end of fiscal year. Destroy 10 years after cut off.</p> |
| 2 | <p><u>AUDIT CASE FILES</u></p> <p>Case files of internal audits of agency programs operations, and procedures, and of external audits of contractors and grantees, containing audit reports, correspondence, memoranda, and supporting working papers.</p>   | <p>Cut off at end of fiscal year in which case is closed. Destroy 8 years after cut off.</p>                                     |

December 20, 1999

Mr. Charles McLane  
U.S. Department of the Interior  
Office of Inspector General  
Division of Acquisition and Management Operations  
Mail Stop 5340  
1849 C Street, NW  
Washington, DC 20240

Dear Mr. McLane:

As discussed with Alfreeda Nelson, we are withdrawing and returning without action Job Number N1-48-99-1 covering records of the Office of Inspector General. The National Archives and Records Administration and your office have agreed that these records are already scheduled in the comprehensive records disposal schedule of the Office of the Secretary of the Interior under Letter Designation G, Items 1 and 2. These items are governed respectively by Disposition Job Numbers NC1-48-79-3, Item 31 and and NC1-48-77-1, Item 32.

If you have any questions, please contact R.Gregory Goodell on 301-713-7100 ext. 225.

Sincerely,

Nina Frederick  
Work Group Leader  
Domestic Work Group 4.

Official File – NWML (Agency correspondence – 1301-1a)

Day file – NWML

cc: Goodell

N1-48-99-1 (Goodell)

NWMWA

NWMDC

NWCTC

NR

Gg/sg/12/20/99

S:\wordfiles\n148991return

**From:** Tracee Butler  
**To:** Greg Goodell  
**Date:** 10/27/99 12:12PM  
**Subject:** Follow-up to N1-48-99-1

I just got off the phone with Alfreeda Nelson at Dept of Interior, Office of the Inspector General. Alfreeda recalled her last conversation with Greg about checking items in Job No. N1-48-99-1 against the previously submitted schedule 48-77-1.

At this juncture, the "powers that be" are trying to reach a consensus on the issue at hand. This decision sounds imminent, just nothing formalized as of yet.

Considering that this Friday is my last day at NWML, I advised Alfreeda to contact Gregg when a consensus regarding this schedule(s) had been reached.

Can I do anything else? I hope that I responded appropriately. Greg, I will return the project folder to you.

Thank You,  
Tracee

**CC:** Michael GRIMES

**Mail Envelope Properties** (3817247E.578 : 12 : 1400)

**Subject:** Follow-up to N1-48-99-1  
**Creation Date:** 10/27/99 12:12PM  
**From:** Tracee Butler

**Created By:** ARCH2D4.A2D4P1:tmbutler

**Recipients**

Post Office ARCH2D3.A2D3P1  
ggoodell (Greg Goodell)  
mgrimes CC (Michael GRIMES)

**Domain.Post Office**  
ARCH2D3.A2D3P1

**Route**  
ARCH2D3.A2D3P1

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1492	10/27/99 12:12PM

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

# REQUEST FOR STAKEHOLDER UNIT ACTION

Job No. N1-48-99-1

Date sent: September 23, 1999

Date Received: \_\_\_\_\_

Date due to sender: September 30, 1999

Route To: <u>Denita Stanton, NR, All, Rm 3600</u>
1. _____
2. _____
Return to: <u>R. Gregory Goodell, NWML, WG 4, 5320, All</u>

This job has also been sent to: NWMW, NWMD, NWCT

Please provide the following assistance in appraising these records:

For stakeholder unit use

\_\_\_\_\_ wishes to

participate directly in the appraisal of the following items on the schedule: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Please contact \_\_\_\_\_ Phone No. \_\_\_\_\_

Date Sent: \_\_\_\_\_

\_\_\_\_\_ wishes to

participate only as a reviewer of the appraisal report.

\_\_\_\_\_ does not

have any interest in the records described.

Daisy Weber - NR wants a

copy of completed job

NWML Contact:	
R. Gregory Goodell, NWML	Room number: 5320
	Phone No. (301) 713-7100 ext 225

Note: As this form documents formal actions taken, it should be filed as part of the job dossier.

# REQUEST FOR STAKEHOLDER UNIT ACTION

Job No. N1-48-99-1

Date sent: September 23, 1999

Date Received: 9/24/99

Date due to sender: September 30, 1999

<b>Route To:</b> Joseph D. Schwarz, NWCT, All, Rm 2600
1.
2.
<b>Return to:</b> R. Gregory Goodell, NWML, WG 4, 5320, All

This job has also been sent to: NWMW, NWMD, NR

Please provide the following assistance in appraising these records:

### For stakeholder unit use

\_\_\_\_\_ wishes to

participate directly in the appraisal of the following items on the schedule: \_\_\_\_\_

Please contact \_\_\_\_\_ Phone No. \_\_\_\_\_

Date Sent: 9/24/99

\_\_\_\_\_ wishes to

participate only as a reviewer of the appraisal report.

NWCTC does not

have any interest in the records described.

\_\_\_\_\_ wants a

copy of completed job

<b>NWML Contact:</b>	
R. Gregory Goodell, NWML	<b>Room number:</b> 5320
	<b>Phone No.</b> (301) 713-7100 ext 225

Note: As this form documents formal actions taken, it should be filed as part of the job dossier.

# REQUEST FOR STAKEHOLDER UNIT ACTION

Job No. N1-48-99-1

Date sent: September 23, 1999

Date Received: \_\_\_\_\_

Date due to sender: September 30, 1999

Route To: Judith Barnes, NWMW, WNRC, Rm 125
1.
2.
Return to: <u>R. Gregory Goodell, NWML, WG 4, 5320, AII</u>

This job has also been sent to: NWMD, NWCT, NR

Please provide the following assistance in appraising these records.

For stakeholder unit use

\_\_\_\_\_ wishes to

\_\_\_\_\_ wishes to

participate directly in the appraisal of the following items on the schedule: \_\_\_\_\_

participate only as a reviewer of the appraisal report.

\_\_\_\_\_

\_\_\_\_\_ does not

Please contact \_\_\_\_\_ Phone

have any interest in the records described

No. \_\_\_\_\_

NWMWA wants a

Date Sent: 9/24/99

copy of completed job

NWML Contact:	
R. Gregory Goodell, NWML	Room number: 5320
	Phone No. (301) 713-7100 ext 225

Note: As this form documents formal actions taken, it should be filed as part of the job dossier.

# REQUEST FOR STAKEHOLDER UNIT ACTION

Job No. N1-48-99-1

Date sent: September 23, 1999

Date Received: 9/23/99

Date due to sender: September 30, 1999

Route To: <u>Roanld E. Swerczek, NWMD, All, Rm 2600</u>	<u>RES, 9/23/99</u>
1.	
2.	
Return to: <u>R. Gregory Goodell, NWML, WG 4, 5320, All</u>	

This job has also been sent to: NWMW, NWCT, NR

Please provide the following assistance in appraising these records:

For stakeholder unit use

\_\_\_\_\_ wishes to

participate directly in the appraisal of the following items on the schedule: \_\_\_\_\_

\_\_\_\_\_

Please contact \_\_\_\_\_ Phone No. \_\_\_\_\_

Date Sent: 9/23/99

\_\_\_\_\_ wishes to

participate only as a reviewer of the appraisal report.

NWMDC does not

have any interest in the records described.

NWMDC wants a

copy of completed job

NWML Contact:	
R. Gregory Goodell, NWML	Room number: 5320
	Phone No. (301) 713-7100 ext 225

Note: As this form documents formal actions taken, it should be filed as part of the job dossier.

**From:** Jerome Nashorn  
**To:** Jean Keeting, Richard Boyden  
**Date:** 9/28/99 11:21AM  
**Subject:** Re: GRS 22

Jean referred your inquiry to me. My understanding is that with the rescission of GRS 22, any agency authorities stemming solely from it were voided, making the records U. On the issue of exceptions, the wording quoted from the Bulletin is pretty clear - if an agency got an exception, the authority is still valid. It may warrant revision, but so do many currently valid authorities. Whether you carry out the schedule is another matter. If you're on record as saying that the schedule, while technically valid, could result in the loss of permanent documentation, you shouldn't use it to toss the records.

On the issue of authorities approved before the GRS, they too are valid in my opinion. I base this on 36 CFR 1228.42(a) which states unless a new GRS says it must be applied without exception, older authorities that provide shorter retention periods are still valid. This clearly validates pre-GRS 22 authorities that called for shorter retentions. They were never superseded by GRS 22. The question of older schedules with longer authorities is less clear cut. However, if a pre-22 schedule with shorter retentions is valid, I don't see where we could be faulted for applying a pre-22 schedule with a longer retention period now that GRS 22 is gone (Unless you're on record as saying that the schedule may have flaws that could result in disposing of valuable records).

>>> Richard Boyden 09/23/99 03:06PM >>>  
Hello Jean:

I am told that you are the reigning expert on this topic. This should have been resolved a long time ago, but I am still confused. Perhaps you can help me.

When we implemented the GRS 22 rescission many months ago, a number of approved SF 115s covering IG records were proposed by various A&D branches through NR as having similar problems to GRS 22. It was generally felt by the regions and by WNRC that these should be changed to unscheduled, and they were. Some time between then and now, I spoke with someone in NWML who informed me that any records covered by an approved SF 115 are still scheduled. (I can't remember exactly who this person was, but she confirmed this information with Jerry Nashorn.)

Can you confirm that:

1. Anything based on GRS 22 is unscheduled.
2. Anything that cites an approved SF115 is still scheduled.

NARA Bulletin 99-02, 4b states:

"If we have granted you an exception to GRS 22 in a previously approved records schedule, you do not have to take any action. Your approved schedule remains in effect."

Am I correct in assuming that "granted you an exception" means that if an agency has an approved SF 115, even though it may contain some or all of the methodological problems associated with the blanket authority previously granted by GRS 22, it is still valid?

I assume it also means an "exception" can be considered to have been granted in the case of a SF 115 approved in 1976 or 1981 even though GRS 22 wasn't issued until 1986?

We have some OIG records with separate SF 115 authority on our disposal report, and I wanted to check to make sure I really understand this before I authorize disposal.

Thanks

Richard Boyden  
Senior Archivist  
Records Management Program  
NARA Pacific Region  
San Bruno

CC: Larry BAUME, Marie B. Allen

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION  
 COVER SHEET - TRANSACTION DOSSIER

<b>TRANSACTION</b>	
<b>NUMBER</b>	<b>OTHER IDENTIFICATION</b>
<b>CLOSED</b>	
<b>DATE</b>	<b>BY (Signature)</b>
<b>CONSOLIDATED WITH</b>	
<b>TRANSACTION NUMBER</b>	<b>OTHER IDENTIFICATION</b>
<b>RELATED TRANSACTIONS</b>	
<b>TRANSACTION NUMBER</b>	<b>OTHER IDENTIFICATION</b>
<b>INSERTIONS AND CHANGES</b>	
<b>DATE</b>	<b>NATURE OF INSERTION OR CHANGE</b>