

Frequently Asked Questions (FAQs) about the General Records Schedules

December 2019

A. General Questions	2
B. Questions about Flexible Disposition Instructions in the GRS	6
C. Questions about GRS Notifications and Deviations	8
Notifications	9
Deviations	11

A. GENERAL QUESTIONS

A1. What are the General Records Schedules (GRS)?

The Archivist of the United States issues the General Records Schedules (GRS) to provide disposition authority for records common to several or all agencies of the Federal Government. These schedules authorize agencies, after specified periods of time, to either destroy temporary records or transfer permanent records to the National Archives of the United States (NARA).

A2. What is the authority for the GRS?

The Archivist issues the GRS under statutory authority in 44 U.S.C. § 3303a(d). Title 36 CFR 1227 describes how to use the GRS.

A3. Where can I find additional GRS information?

You can find additional information about the GRS, including FAQs for each individual GRS, on the [GRS web page](#). You can also send questions to GRS_Team@nara.gov.

A4. Is “GRS” singular (General Records Schedule) or plural (General Records Schedules)?

Either is correct, depending on context. “*The GRS*” refers to the entire set of schedules: it is plural because the whole is made up of many individual schedules. “GRS” is singular: it refers to a single schedule within the whole (such as, “GRS 2.2”).

A5. What do GRS numbers mean?

Each GRS item is associated with two numbers. For example, payroll records are “GRS 2.4, item 040” but also “DAA GRS 2016 0015 0004.” The first number is composed of the GRS chapter number (X.X), and a 3 digit item number. It identifies where you can find the item in the GRS.

The second number is a unique identifier for the “disposition authority.” It is the legal authority to destroy records or transfer them to NARA. This number begins with “DAA” or, on rare occasion, “N1.” A DAA number is composed of five blocks:

DAA – an acronym meaning “Disposition Authority created by an Agency”

GRS – the scheduling group identifier for the schedule; in this case, the GRS

2016 – the fiscal year in which the schedule was initiated; in this case, 2016

0015 – the number of this GRS schedule; in this case, the 15th schedule proposed during fiscal year 2016;

0004 – the item number in this schedule; in this case, the 4th item.

Agencies must include the disposition authority number to transfer permanent records to NARA.

A6. What types of records does the GRS cover? What does it not cover?

All records can be linked to one of three broad categories: “administrative,” “mission,” and “mission support.” The following table defines each and the degree to which records are likely to be covered in the GRS.

<i>Record type</i>	<i>Definition</i>	<i>Examples</i>	<i>GRS coverage</i>
Administrative records	Records created in carrying out general, non-mission-related functions that keep an office operating.	Records tracking employee time and attendance, hiring personnel, paying bills, monitoring supplies, vehicle maintenance, information technology processes, security, and a myriad of housekeeping tasks.	The GRS offers nearly complete coverage. These records document functions common to the entire Federal Government (or at least wide swaths of it). GRS items can be used by any agency since they are scheduled for retention Government-wide.
Mission records	Records created in pursuing an agency's mission the unique functions for which the agency has been established.	Records documenting tax collection (Internal Revenue Service), caring for national parkland (National Park Service), protecting the environment (Environmental Protection Agency), and responding to threats to public health (Centers for Disease Control).	Generally not covered in the GRS. Must be scheduled individually by the agency responsible for the mission. Exception: committees established under the Federal Advisory Committee Act, whose records are covered in GRS 6.2.
Mission support records	Records of functions providing support for agency mission accomplishment.	Records created by agency functions such as legal counsel, public affairs, grant administration, and monitoring and evaluating how an agency carries out its mission.	The GRS covers these records when their business and historical value can be established Government-wide. The GRS sometimes makes note where it cannot cover specific mission support records and refers their scheduling to individual agencies.
Administrative or Mission records, depending...	Some functions are the mission of one agency and administrative for all other agencies Government-wide.	Personnel position classification and employee recruitment are mission functions of the Office of Personnel Management. They are administrative processes everywhere else.	The GRS covers these for agencies where the function is administrative. It does not cover records created by agencies for which the function is a mission.

A7. Is the GRS mandatory?

The GRS is mandatory, but, unless an item or schedule says that agencies must follow it without exception, an agency may request a deviation from a specific GRS item by submitting a schedule to NARA with a justification for the deviation. See [Questions about GRS Notifications and Deviations](#).

A8. When must agencies apply the GRS?

[36 CFR 1227.12](#) defines when agencies *must* use the GRS, when agencies *may* either use the GRS or request a deviation from the GRS, and when agencies can ignore the GRS. For further information, see [Questions about GRS Notifications and Deviations](#).

A9. My agency has a NARA-approved records schedule authority for records. A new GRS authority covers the same records. Can I still destroy records (or transfer them to NARA if permanent) per my agency authority?

In the course of drafting a new GRS, NARA may identify agency authorities that cover the same records. The GRS *always* takes precedence over agency schedules. Therefore, when a new GRS is released, NARA may notify agencies that they should discontinue using those agency schedules and use the GRS instead. When a new GRS item describes the same records your agency item covers, use the GRS item and its retention instructions, if at all possible. If this is not possible, you need to submit a new schedule requesting a deviation from the GRS. See [Questions about GRS Notifications and Deviations](#) for further information about this process. Agencies must notify NARA within 120 days if they wish to continue using an agency authority superseded by the new GRS.

A10. My agency authority calls for a 5-year retention period. The GRS item covering the same records specifies a 3-year retention period, but also states that “longer retention is authorized if required for business use.” Can I still keep the records for five years?

Yes. Because the GRS retention instruction is flexible, you can keep the records for five years and still cite the GRS as the authority. See [Questions about Flexible Disposition Instructions in the GRS](#) for additional information.

A11. My agency records disposition manual is a combination of agency-specific and GRS items. What should I do with GRS-based items when a new GRS is published?

See the [Checklist for Implementing the GRS](#) for directions on updating your agency disposition manual.

A12. My agency records disposition manual includes GRS items that were not superseded by new GRS items, but were instead rescinded. Can I still use those items to dispose of records?

No. You can no longer use a rescinded GRS item as the authority to destroy records. A GRS item should be rescinded only if the records it described are no longer being created. If your agency does in fact still create these records, it must schedule them independently. If you still hold records covered by a rescinded GRS item, please contact GRS_Team@nara.gov immediately.

A13. Why does the GRS include items for copies of records? Aren't copies "non-record" material?

Many copies of records are kept only for convenience of reference. They are indeed *non records* and for that reason are not mentioned in the GRS. But sometimes copies of records are used to make decisions or take action. For example, a program office may initiate and track a case file and send a copy to another program office to support the second office's mandate or action. Even though the second office has a copy, that copy is also a Federal record. An example of this is GRS 1.1, items 010 and 011. Item 010 covers financial management records in offices responsible for managing the agency's finances. Item 011 covers copies of those same records held in other offices for other business purposes, such as making office budget decisions.

A14. Can I still dispose of records in monthly, quarterly, or annual batches?

Yes. Batching records for disposal is a time honored custom. For most analog records it's the only really workable option. Batching frequency should reflect volume of records and local storage capacity. Popular batches are records closed within a month, quarter, or year. Batches should not cover more than a single fiscal or calendar year. For example, an agency may choose to retire its closed financial management records on a quarterly basis (e.g. 4th Quarter, 2019), but batch its closed employee hiring records as a single unit covering an entire year (e.g. FY 2019). If the records in the FY 2019 batch have a 6 year retention period, the agency must keep the entire batch until the newest records reach that 6 year mark and then dispose of the whole batch at once. It's okay that some records from early in the year may be retained for nearly seven years before destruction as a result.

A15. What are the "legal citations" attached to many GRS items? How should I use them?

A legal citation in a GRS item points to a section in the United States Code (U.S.C.) or Code of Federal Regulations (CFR) only when that citation is the basis for the item's retention period. A U.S.C. or CFR citation means that agencies subject to that regulation are *bound* to use the GRS retention period. Agencies not subject to the regulation *may* use the GRS item if they create the records it describes and the retention period suits their business needs.

B. QUESTIONS ABOUT FLEXIBLE DISPOSITION INSTRUCTIONS IN THE GRS

B1. What are flexible disposition instructions?

Flexible disposition instructions are those that are in some way open ended. They allow agencies the option to retain the records for either longer than the minimum retention period set by the disposition instruction, or shorter than the maximum retention period. Sometimes they leave retention periods entirely up to the user, who is advised to “destroy when no longer needed.” Some GRS items use this last type of instruction, but the majority of flexible dispositions in the GRS set a minimum retention period, then state that “longer retention is authorized if required for business use.” For further information on flexible disposition instructions, see NARA’s [FAQs about Flexible Scheduling](#), Section 3.

B2. Why does the GRS use flexible disposition instructions?

GRS items must be usable by any Federal agency. Agencies may not all have identical retention needs, even for records that are common to many or most agencies. To accommodate the potential need for varied retention periods, the GRS establishes baseline requirements—usually minimum retention periods—then leaves it to agencies to determine their business need to retain records for longer.

Flexible disposition instructions in the GRS are good for both agencies and NARA. Benefits include:

- An agency may establish a fixed retention period for itself within the GRS parameters without further NARA approval. For instance, if an agency has a business need to retain information technology infrastructure project records for ten years rather than the five years required by GRS 3.1, item 010, it can specify 10 year retention in its internal instructions, and cite the GRS authority. It does not need to submit a schedule to NARA to obtain authorization for 10 year retention.
- An agency may create big bucket items that cover records described by many different GRS items, and assign the longest GRS retention period to the entire bucket, as long as the bucket contains only records covered by the GRS, each GRS item allows flexible retention periods, and the minimum retention of each GRS item is met. The agency needs not seek NARA approval to create such buckets.
- NARA can include more items in the GRS, even if retention needs differ among agencies. This saves appraising separate schedules from multiple agencies covering identical records and differing only in retention period.
- NARA does not need to review an agency’s disposition instructions for records covered by the GRS as long as they meet the basic retention requirements.

B3. How should I implement flexible disposition instructions in traditional, non-bucket schedules?

If your agency's retention period already falls within the GRS item's flexible parameters, you need not do anything other than update the GRS disposition authority number. But you can also use GRS flexibility as an opportunity to reassess how long your agency has a business need for the records. You may:

- Use the GRS minimum retention period, but omit the "longer retention is authorized if required for business use" clause from your disposition manual. You have now removed flexibility and fixed retention for your agency at a single time period. But you should still cite the GRS disposition authority number as the item's authority.
- Set a specific retention period or retention band within the GRS item's parameters. For example, if the GRS says "Destroy when 3 years old but longer retention is authorized if required for business use," you may say "Destroy when 5 years old" and include the flexible retention clause or not. You have now established a longer retention period for your agency. Again, you should still cite the GRS disposition authority.
- Use the GRS disposition instruction exactly as written, leaving specific retention beyond the minimum period up to offices or individual users.

B4. How should I implement flexible instructions in big-bucket schedules?

If your agency big bucket schedule item covers records also covered by a newly issued GRS, you must notify NARA (per 36 CFR 1227.12) of your intent to continue to use your bucket item rather than the GRS. See [Questions about GRS Notifications and Deviations](#). As long as your bucket's retention period falls within the GRS flexible parameters, NARA will concur in your agency bucket item remaining in force.

The most likely situation in which NARA will not approve continuing your agency bucket item is when the bucket's disposition instructions cannot accommodate cutoffs required by some records series within the bucket. For example, an agency might incorporate a GRS 3 year retention period item into a bucket whose retention instruction is "Destroy when 5 years old," meaning the clock starts ticking at document creation. But if the GRS item's disposition instruction is "Destroy 3 years after superseded or obsolete," its clock may not begin ticking until the document is already several years old. Destruction of everything in a bucket at five years of age could wipe out records still in active use. This can be solved if the bucket's disposition instruction cites a non specific cutoff ("Destroy 5 years after cutoff") while an accompanying crosswalk details specific GRS item cutoffs ("Cut off on final adjudication") as appropriate.

B5. My agency's records management application (RMA) requires fixed cut-off statements and retention periods. How can I incorporate flexible GRS disposition authorities into it?

An agency is free to *not* use GRS flexibility, as discussed in question B3. If your RMA's records disposal date fits within the parameters of GRS disposition instructions, you may either cite the

GRS disposition authority number or continue to use your agency schedule item (if the GRS permits) by notifying the GRS Team within 120 days after the new GRS is issued. If your RMA's records disposal date does not fit within the parameters of GRS disposition instructions, you may request a deviation from the GRS by submitting a new agency schedule.

C. QUESTIONS ABOUT GRS NOTIFICATIONS AND DEVIATIONS

C1. What is a GRS notification? What is a deviation from the GRS? How do they differ?

A GRS notification occurs when an agency informs NARA that it intends to use its own approved agency specific disposition authority rather than a newly transmitted GRS item. The agency must notify NARA within 120 days after that new GRS item is published.

A deviation from the GRS occurs when an agency creates a new agency schedule item that covers records already scheduled by the GRS, and submits it to NARA for approval. The GRS Team must review and approve a deviation request before an agency can use it.

Note that merging two or more GRS authorities together is not a deviation, unless the agency does not cite the GRS as the disposition authority. As long as an agency uses the longest retention of the items being combined or a longer retention, if allowed by all the items, it is not a deviation from the GRS as long as the agency continues to cite the GRS as the disposition authority. We recommend citing all of the associated GRS authorities for the item, however, in case any of those authorities are later revised.

C2. What is a GRS exception?

Sometimes, people use this term to express the concept NARA calls a "deviation from the GRS." "GRS exception" is not the preferred term.

C3. If the new GRS does not meet my agency's disposition needs, what should my agency do?

If your agency has an approved agency schedule for the records and the relevant GRS permits the use of existing agency schedules, your agency may choose to continue using its own schedule and notify NARA of its intent. You would cite to the agency records schedule when disposing of the records.

If your agency does not have an approved schedule for the records and the new or revised GRS does not require adherence without exception (for example, the disposition instruction for GRS 2.8, item 060, states, "This disposition instruction is mandatory; deviations are not allowed"), your agency may request a *deviation* from the GRS by submitting a schedule to NARA for approval. If NARA approves the agency schedule, you can use it instead of the GRS. If your agency does not request a deviation, does not submit a proposed agency schedule, or NARA does not approve it, your agency must use the GRS instead.

Flexible GRS items may meet your agency's disposition needs, even if they do not appear to do so at first glance. If your agency's existing disposition instruction is within GRS parameters (for example, the GRS disposition instruction states "Destroy when 3 years old, but longer retention is authorized if needed for business use" and your agency has scheduled the records for 5 year retention), your agency may continue to use the same retention period contained in the agency instruction, and needs not submit either a notification or a deviation request to NARA. However, you must cite the GRS disposition authority number, not the agency schedule. In other words, your agency does not have to change its retention period for the records if it is within the period allowed by the GRS, but it must stop using its agency schedule as the disposition authority and use the GRS instead.

C4. NARA approved a deviation from the GRS for my agency prior to the GRS being entirely rewritten beginning with Transmittal 23 in 2014. Is that deviation still valid?

No. Whenever a new GRS is issued, it supersedes all agency items covering the same records. If your agency wishes to continue with its previous deviation from the GRS, it must notify NARA within 120 days after that new GRS is published. Keep in mind that if the new GRS item allows flexible retention periods, it may not be necessary to request a deviation. You may be able to use the new GRS authority and still retain the records for as long as your previous deviation specified.

C5. If a GRS disposition instruction is flexible, and my agency already has a more specific instruction, do we need to notify NARA that we will use our own schedule? If the GRS disposition is flexible, and my agency wants (but does not already have) a more specific instruction, do we need to request a deviation via a new schedule?

Yes and No. If an agency wants to continue using its own previously approved records schedule when the GRS item adequately covers the records, the agency must notify NARA within 120 days after the new GRS is published. The agency may use this option if the relevant GRS item does not specifically state it must be followed without exception.

If an agency wants a more specific instruction and the GRS disposition is flexible (is either "destroy when no longer needed" or contains the statement "longer retention is authorized if required for business use"), the agency may issue its own more specific disposition instructions in its agency disposition manual, but only within the parameters of the GRS disposition. For example, if the GRS says "destroy when no longer needed," the agency may set the more precise instruction to "destroy when 3 years old." As long as the agency cites the GRS item as the authority, it does not need to request a deviation.

Notifications

C6. Why does NARA require GRS notifications?

Notifying NARA allows us to review the agency authority and determine if it is still appropriate. In some cases, the GRS has been updated to comply with changes in statutes or regulations. If

an agency authority does not align with the GRS content, the agency authority may not comply with current statutes and regulations, therefore putting the agency at risk of improperly destroying records.

In other cases, the agency authority may be permanent and the GRS authority temporary. That temporary determination was made only after considerable study and concurrence from NARA’s custodial units. Notifying NARA allows appraisers and custodial archivists to review the agency item to determine if its permanent status remains valid.

C7. When must agencies submit GRS notifications?

My situation	and	and	Must I notify NARA?
A new GRS item supersedes my existing agency-specific disposition authority	my agency-specific item retention period falls outside new GRS item parameters ¹	my agency wishes to continue using its own authority and retention period	Yes
		my agency is willing to abandon its own authority and use the GRS authority and retention period instead	No
	my agency-specific item retention period is within new GRS item parameters ¹	my agency wishes to continue using its own authority	Yes ²
		my agency is willing to abandon its own authority and cite the GRS authority instead	No
	my agency-specific item is a big bucket item covering at least one new GRS item	my agency wishes to continue using its own authority	Yes
A new GRS transmittal contains no items that supersede any existing agency-specific items			No

C8. How does my agency submit a GRS notification to NARA?

If your agency wishes to follow its own schedule instead of a new or newly revised GRS, you must notify NARA within 120 days of the transmittal of the new or revised GRS. To notify NARA, send an email to GRS_Team@nara.gov with the subject heading “<Agency name> GRS Notification.” Download and fill out the [spreadsheet](#) (Supersession Citation Table) and attach it to your email. The spreadsheet includes the following information: the agency citation (NARA disposition authority, agency manual citation, and retention period) and the superseded GRS citation (new GRS number, item number, and retention period).

C9. When might NARA deny a GRS notification?

¹ Many GRS items state that “longer retention is authorized if required for business use.” For example, if the GRS item is 6 years but longer retention is authorized, and your agency retention is 7 years, your retention is within the parameters of the GRS item.

² We recommend that agencies cite the GRS wherever possible. The impact on agency disposition manuals of future changes to GRS items will then be more obvious.

We will deny a notification if the GRS item has a mandatory retention period. At present, the list of such items is limited to GRS 2.2, items 071 and 073; and GRS 2.8, items 060, 061, 062, 063, 070, 071, 072, 080, and 081.

We may deny a notification if the agency retention period puts the records or the agency at risk. We may also deny a notification if the value of the records has changed. For example, the records may have been scheduled years ago in the agency as permanent, but NARA has since declared the records temporary and scheduled them as such in the GRS. We review such cases closely to determine if permanent value still exists for the requesting agency's records.

Deviations

C10. When might an agency seek to deviate from the GRS?

The four most likely reasons an agency might seek a deviation from the GRS are:

- to reduce a retention period,
- to extend a retention period when longer retention has not been authorized,
- to achieve permanent retention status for records the GRS deems temporary,
- to merge GRS item(s) with agency specific records series into a single disposition authority.

The need for deviations from the GRS has been greatly reduced by the flexible retention periods for many GRS items. For instance, in the days of the old GRS, an agency sought to deviate from the GRS 2 year retention period for personnel award records and retain them for 10 years in order to refer to them when considering employee promotions. Because new GRS 2.2, item 030, Employee incentive award records, has a flexible retention period, that agency could now retain the records for 10 years without needing to request a deviation.

C11. How does my agency request to deviate from the GRS?

An agency must make the request by submitting a proposed records schedule item via the Electronic Records Archive (ERA). The item must cite each GRS item from which it seeks to deviate, include a proposed retention period outside the GRS parameters for those GRS items, and provide a justification for the deviation. Some GRS items, such as accountable officer records, require additional concurrence from other oversight agencies such as GAO. Please contact the GRS Team at GRS_Team@nara.gov if you have questions about whether a request requires additional agency review.

C12. Can an agency deviate from the GRS without submitting a schedule?

Yes, in this specific circumstance: if an agency seeks only to temporarily extend the retention period for a GRS item whose retention period is not flexible. Per 36 CFR 1226.18a, agencies may temporarily retain records approved for destruction beyond their NARA approved retention period if special circumstances (such as a records freeze or hold) alter the normal

administrative, legal, or fiscal value of the records. Our web site at [Freeze Process Overview/FAQ](#) provides details on how to request such a records freeze.

C13. Why might NARA deny a request to deviate from the GRS?

We will categorically deny a request to deviate from the GRS if a GRS item states that it is mandatory. Currently, the list of such items is limited to GRS 2.2, items 071 and 073; and GRS 2.8, items 060, 061, 062, 063, 070, 071, 072, 080, and 081.

A request to deviate from the GRS by scheduling for permanent retention records the GRS deems temporary will undergo considerable NARA scrutiny, but we invite an agency to make its case.