

NARA Policy Implementing Media Neutral Record Schedules

BRIDG Meeting
December 19, 2007

Overview

- Introduction
- Goals
- New Regulations
- Revisions to GRS 20
- Next Steps

Introduction

- Bottom line -- New records schedules and certain existing approved records schedules are now media neutral
- Central tenet of NARA's Records Management Initiatives
- Requested by Federal agencies, but complex and not without concerns
- Brief chronology
 - November 19, 2004 - Proposed rule issued
 - November 15, 2007 - Final rule issued
 - December 14, 2007 – Revisions to GRS 20 issued
 - December 17, 2007 – New provisions in effect

Goals

- Update scheduling focus from traditional paper-centric approach to current multimedia mixed format reality
- Provide greater scheduling coverage for both new and existing agency records
- Reduce workload for agencies and NARA
- Formalize de facto practices in place since 1990

New Regulations

Revisions to 36 CFR 1228.24 and 1228.31 as follows:

- Makes all new schedules submitted after December 17 media neutral unless otherwise specified [1228.24]
- Allows schedules previously approved for certain hard copy records to be applied to electronic versions [1228.31(b)]
- Specifies when electronic versions of previously scheduled records require a new 115 [1228.31(a)]
- Establishes notification requirements that agencies must follow when replacing previously approved permanent records with electronic records [1228.31(b)(1)]

Revisions to GRS 20

Items 2, 3, 11, and 16 have been revised to:

- Expand the authority agencies have to apply previously approved records schedules to electronic records
- Grant broader authority to agencies to dispose of hard copy records that have been converted to an electronic format
- Add disposition instructions for ad hoc printouts and documentation associated with permanent electronic records

Revisions to GRS 20

Type of Record	Need 115?	Conditions	Citations
■ Electronic versions of records covered by a media neutral schedule item	No	Does not apply to temporary program records maintained on an agency web site.	■ GRS 20, Item 3(b)(4) and 3.1 ■ 36 CFR 1228.31(b)(4)(ii)

Revisions to GRS

Type of Record	Need 115?	Conditions	Citations
<ul style="list-style-type: none">■ Electronic versions of administrative housekeeping records covered by the GRS or an agency schedule	No	<ul style="list-style-type: none">■ For certain specified GRS items, a new schedule is needed for electronic formats other than scanned image (see GRS 20, Item 3(b)(2), for these exclusions).■ If electronic records are drawn from multiple series, the longest previously approved retention period applies.■ May be applied to administrative or housekeeping web site records.	<ul style="list-style-type: none">■ GRS 20, Item 3(b)(1)■ 36 CFR 1228.31(b)(4)(i)

Revisions to GRS

Type of Record	Need 115?	Conditions	Citations
Scanned images of temporary hard copy records	No	<ul style="list-style-type: none">■ Applies to administrative housekeeping records and program records.■ Does not apply to program records maintained on an agency web site.	<ul style="list-style-type: none">■ GRS 20, Item 3(a)■ 36 CFR 1228.31(b)(3)

Revisions to GRS

Type of Record	Need 115?	Conditions	Citations
■ Electronic versions of temporary audio-visual records	No	<ul style="list-style-type: none">■ Applies regardless of format of electronic records.■ Does not apply to program records maintained on an agency web site.	<ul style="list-style-type: none">■ GRS 20, Item 3(b)(3)■ 36 CFR 1228.31(b)(2)

Revisions to GRS

Type of Record	Need 115?	Conditions	Citations
■ Electronic versions of temporary program records other than scanned images	Yes	NARA review required due to potential increase in value of the electronic records (eg manipulability)	■ GRS 20, Item 3(b)(5) ■ 36 CFR 1228.31(a)(4)

Revisions to GRS

Type of Record	Need 115?	Conditions	Citations
Electronic records that replace permanent records	No	<ul style="list-style-type: none">■ Electronic records must meet NARA standards for permanent records.■ Permanent disposition may be applied if the electronic records replace more than one permanent series.■ Agencies must provide notification to NARA within 90 days of when electronic recordkeeping system becomes operational.	<ul style="list-style-type: none">■ GRS 20, Item 3.1■ 36 CFR 1228.31(b)(1)

Next Steps

- Develop operational procedures for agency notifications to NARA
- Collect agency questions and concerns on these policies
- Develop supplemental guidance and/or FAQs on implementing media neutrality

Discussion

- Questions?
- Comments?

For additional information see:

<http://www.archives.gov/records-mgmt/policy/guidance-regulations.html>