

ATTACHMENT 2

EXPLANATION OF PROPOSED CHANGES TO GRS 20

Input/source records (Item 2a)

The changes we propose allow agencies to dispose of the hard copy documents used to create electronic records so long as electronic records capture all the information contained in the source records (e.g., handwritten annotations). In addition, in the case of permanent records, the electronic records must meet the standards for permanent electronic records in effect when the records are created. This authority may be used for correspondence, memorandums and other records that are converted to an electronic format as well as for input documents created and used solely for data entry. The current GRS for source/input records applies only to the latter.

Electronic records that replace previously scheduled temporary records (Item 3)

Our current proposal allows agencies to apply previously approved retention periods to:

- administrative housekeeping records covered by items in the GRS or in an agency-specific schedule,
- digital versions of temporary audiovisual records, and
- scanned images of temporary program records.

This change expands the coverage of the GRS, which currently allows agencies to use previously approved disposition authorities for electronic records only if the records are administrative housekeeping files. The notes that follow item 3 also allow agencies to apply previously approved retention periods to the electronic versions of administrative housekeeping records even if the electronic records contain information drawn from multiple previously scheduled series. In such instances, the electronic records must be maintained for the longest retention period specified in the previously approved schedule.

The proposed revisions to Item 3 still require agencies to submit a schedule to NARA if they convert temporary program records to an electronic format other than scanned image. This is because of the possibility that records that are temporary if maintained in hard copy may warrant permanent retention if converted to an electronic format that permits manipulation of the information or significantly enhances access (e.g., a database).

Electronic records that replace previously scheduled permanent records (Item 3.1)

Under our current proposal, an agency need not submit a new schedule if it converts a previously scheduled permanent series to an electronic format. Likewise, a new schedule is not needed if the electronic records contain information drawn from multiple permanent series. Instead, the agency must notify NARA so that we can plan more

effectively for the transfer of these records, including establishing a new transfer date for the records, if warranted. (This requirement will be included in new regulations regarding media neutral schedules that NARA will issue when the proposed revisions to GRS 20 are approved.) Currently, agencies must submit a new schedule to NARA if a permanent series is converted to an electronic format, except when the underlying schedule is media neutral.

Documentation (Item 11)

We propose modifying the current GRS item for documentation by adding a sub-item that provides for the permanent retention of documentation associated with permanent electronic records. The GRS now in effect only covers the documentation that pertains to temporary electronic records.

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