

## Frequently Asked Questions (FAQs) about GRS 5.2, Transitory and Intermediary Records

### QUESTIONS ABOUT ITEM 010 – TRANSITORY RECORDS

#### 1. What are examples of transitory records?

Transitory records are required for only a short time (generally less than 180 days). They are not required to meet legal or fiscal obligations or to initiate, sustain, evaluate, or provide evidence of decision-making.

The following are possible examples of transitory records. Even with these examples, however, the records must meet the conditions defined above:

- Transmittal documents such as email, letters, cover memos, and facsimile cover sheets
- Received copies of circulated internal information such as agency instructions, notifications, circulars, newsletters, and email blasts to employees
- Messages received from agency distribution lists or listservs
- “To-do” or task lists, assignments, and work orders, including for custodial services or minor repair work
- General information request files requiring no policy decision or special compilations or research
- Ad-hoc reports, including queries on electronic systems, used for one-time reference
- Data output files from electronic systems for information sharing or short-term reference

#### 2. Why does this item include seemingly non-record materials such as “messages received from agency distribution lists or listservs” and “notifications, circulars, newsletters, and email blasts to employees”?

Just because something is a copy does not mean that it is non-record. If it is used for decision-making or taking action, it is a record. Only reference copies are non-records. These record types are included here as examples of transitory records for those agencies that may be hesitant to declare them non-record.

#### 3. When are electronic messages and email transitory?

Certain electronic messages, including email, *may* be transitory. Examples include:

- Electronic messages coordinating schedules, appointments, and events
- System reminders, alerts, bounce backs, and ‘for your information’ messages where the recipient is not required to take any action

However, electronic messages and email may only be deemed transitory provided that they *do not*:

- contain information necessary to adequately and properly document the activities and functions of the agency
- provide documentation of agency decisions and commitments reached orally (person-to-person, phone, video, or in conference)

- convey information of value on agency activities if the electronic message adds to a proper understanding of agency operations and responsibilities
- document the formulation and execution of policies and decisions
- denote actions or decisions taken by agency Capstone officials (Capstone officials are defined in GRS 6.1)
- provide evidence related to fiscal or legal rights and obligations

**4. What are “inaccessible permanent records” in the exclusion? Why does item 010 exclude summarized information derived from such records?**

Electronic records may be scheduled as permanent, but a given record may be lost, corrupted, or otherwise unusable. In that case, a data file output containing summarized information may be the only accessible version of the record. NARA might want to take this output record in place of the inaccessible/unavailable permanent master record. This exclusion does not mean agencies must keep such outputs in case the permanent record becomes inaccessible at some future point. It only means that if the master file is inaccessible and you have the output records, you should contact NARA to see if you should transfer the output records instead.

**QUESTIONS ABOUT ITEM 020 – INTERMEDIARY RECORDS**

**5. What are examples of intermediary records?**

Intermediary records exist to create subsequent records. They must not be required to meet legal or fiscal obligations or to initiate, sustain, evaluate, or provide evidence of decision-making.

The following are examples of intermediary records:

- Ad-hoc reports, including queries on electronic systems, used to create a subsequent report
- Drafts not intended for further use that do not contain significant or substantial changes or annotations and are not required to document business activities
- System printouts or versions used to verify data or answer queries that are not part of regular reporting procedures and are not required for ongoing use
- Spreadsheets or word processing documents that have been incorporated into a separate final document
- Audio and video recordings of meetings that have been fully transcribed or that were created explicitly for the purpose of creating detailed meeting minutes (once the minutes are created) (Note: The term “meetings” does not include interrogations, interviews, or other situations whose purpose is to subject individuals to questioning.)
- Dictation recordings
- Paper/analog input records, such as paper forms, that are not digitized and are used solely for data entry, where all significant information on the input record is captured as data in the electronic system
- Electronic input records, such as transaction files or output files created specifically for input into another system
- Digitized versions of records solely created for the purpose of extracting data from the digitized record for inclusion in another system. (This GRS covers the digitized version of the record, but the source record is not covered by this GRS or GRS 4.5.)
- Copies of electronic records received from other federal agencies or state, local,

- or tribal government entities for input or integration into the agency's systems
- Routine or rough calculations

#### **6. What types of records do not fall under this item?**

This item would not cover the following:

- Source records that have been digitized so that the digitized version will serve as the recordkeeping version of the record (see GRS 4.5, item 010)
- Early versions of records that include information, such as comments or annotations demonstrating decision making, that are not captured in the final record
- Data in a case tracking system where users enter information from a record, but the record itself remains a distinct case file
- Audio and video recordings of meetings that are not created for transcription

#### **7. What are source records in the context of this item?**

Presently, the term "source record" appears in two different contexts in the GRS, each with slightly different meanings.

Intermediary source records, or input records, are the records from which information in an electronic system originates. They may include electronic records such as upload files staged for ingest into a system. They also may include paper or analog records such as paper forms, where information is manually entered from the form into the system. These input records are covered by GRS 5.2, item 020.

Source records used in digitizing records, where the digital version replaces the source record, are scheduled in GRS 4.5, item 010, with certain exclusions. This type of source record is defined as the record from which a digitized version or digitized record is created. The source record should be the record copy that was used in the course of agency business.

Also, keep in mind that the process of entering information into a system doesn't always create a separate record. For example:

- A user enters information directly into the system via an online form; the system captures the data as it is entered;
- Data that moves automatically from one system to another with no associated data file, such as with file or data syncing.

#### **8. Can an electronic system's content consist entirely of intermediary records?**

Yes. If a system's sole function is to receive and integrate data from two or more other systems and export the resultant product to yet another independent system, it is known as a "pass-through system." GRS 5.2, item 020, covers such a system's content.

#### **9. Can an agency use the GRS if an information-sharing agreement covers intermediary records?**

Yes, the disposition instructions in the GRS are flexible enough to support disposition of records it

receives under an information-sharing agreement or license. The agency should destroy or return the records as required by the agreement.

The subsequent records the agency generates should be scheduled on an agency-specific schedule.