

## **GRS 4.5, Digitizing Records**

### **1. What is the purpose of GRS 4.5?**

This schedule:

- Provides disposition authority for source records that were digitized in accordance with NARA regulations.
- Outlines exclusions where the GRS cannot be applied to source records.
- Supports the requirement for federal agencies to manage all permanent records electronically to the fullest extent possible.

### **2. How does GRS 4.5 work with NARA's digitization standards?**

Agencies can use GRS 4.5 if they validate that the digitized records meet NARA's digitization standards. The standards for permanent records are available in [36 CFR 1236 - Subpart E](#).

The standards for temporary records are available in [36 CFR 1236 - Subpart D](#).

If your agency validates that the digitization of federal records meets the standards, then your agency can use GRS 4.5, item 010, to destroy the source records, provided they do not meet any of the exclusions.

After validation, the digitized records become the recordkeeping copy. Therefore, your agency must manage the digitized records according to the disposition authority approved for the source records. After the retention expires, your agency will destroy digitized temporary records or transfer digitized permanent records to NARA, depending on the applicable records schedule.

### **3. What are the exclusions to GRS 4.5?**

- Source records whose digitized versions do not meet NARA's digitization standards
- Permanent source records in formats not yet covered by NARA's digitization standards
- Permanent source records dated before January 1, 1950
- Permanent source records with intrinsic value

In addition, the GRS 4.5 does not apply to:

- Final digitized versions of records
- Input/source records for non-digitized records

### **4. How does my agency use GRS 4.5 if records are unscheduled?**

Your agency must first schedule the records to have disposition authority for the digitized version. Once you know the disposition of the digitized records, you can determine if the source records are disposable under GRS 4.5, item 010.

### **5. What does my agency do if it has source records that are excluded from GRS 4.5, item 010?**

In most scenarios, your agency must submit an agency-specific schedule for source records that are excluded from GRS 4.5. Consult your [NARA Appraisal Archivist](#) if you have questions about rescheduling. See the table below for further guidance.

Exclusion	Related FAQ
1. Digitized versions do not meet the standards established in 36 CFR 1236 Subpart D - Digitizing Temporary Federal Records or Subpart E - Digitizing Permanent Federal Records.	See question 6 below.
2. Formats not covered by 36 CFR 1236 Subpart E - Digitizing Permanent Federal Records.	See questions 7 and 8 below.
3. Source records that were created before 1 January 1950 that have been scheduled as permanent or are unscheduled.	See questions 9 and 10 below.
4. Source records that have intrinsic value in the original medium that would be lost if the content were converted to another medium.	See questions 11 and 12 below.

**6. What if my agency cannot validate that the digitized records meet NARA’s digitization standards?**

If the digitized records cannot be validated as complying with the 1236 Subpart D or E requirements, then your agency cannot use GRS 4.5 to dispose of the source records.

For records that were digitized before the publication of 1236 Subpart D or E, see the Frequently Asked Questions (FAQs) about Previously Digitized Records for options on how to proceed.

**7. What does my agency do if NARA has not issued digitization standards for specific media types, such as film records or x-ray film?**

GRS 4.5 cannot be applied to source records in media types not covered by [36 CFR 1236 - Subpart E](#). NARA is developing additional digitizing standards for other formats and will be updating Subpart E over time.

If your agency has an approved records schedule that specifically identifies the source record of a specific format as permanent, you may continue to transfer those records to NARA through June 30, 2024, as directed by OMB/NARA memo M-23-07.

Due to preservation concerns, we advise agencies to contact the appropriate [NARA Special Media Branch](#) to transfer the records early rather than to send special media records to offsite records

storage.

For more information on digitizing or managing these records, contact [rmstandards@nara.gov](mailto:rmstandards@nara.gov) or your NARA Appraisal Archivist.

**8. What if a series of permanent source records includes both photographic prints that are covered by NARA standards and negatives that are not covered?**

You should digitize the photographic prints to NARA standards in [36 CFR 1236 - Subpart E](#) and destroy the source records using GRS 4.5, item 010. You should either transfer the negatives to NARA before June 30, 2024, or wait until NARA has issued digitization standards for film records. If you have already digitized the negatives, please contact [rmstandards@nara.gov](mailto:rmstandards@nara.gov).

**9. What does my agency do if it has permanent or unscheduled source records that were created or received before January 1, 1950?**

GRS 4.5 cannot be applied to permanent source records that were created or received before January 1, 1950. Agencies must submit a records schedule for the pre-1950 source records. However, GRS 4.5 can be applied to temporary source records created or received before January 1, 1950. For unscheduled records, see question 4.

The 1950 date exclusion is based on the passage of the 1950 Federal Records Act, which established modern recordkeeping practices in the federal government. This exclusion allows NARA to assess the value of these records because they were created or received before modern recordkeeping practices.

**10. What if a series of permanent source records was created or received both before and after January 1, 1950?**

Your agency should submit a records schedule to dispose of the entire date span of source records when any of the records were created or received before January 1, 1950.

The digitized versions of the permanent records are not impacted by the January 1, 1950 date. Those digitized versions should be transferred according to the disposition instructions in the agency's approved records schedule.

**11. What does my agency do if it has source records that are identified as having intrinsic value?**

GRS 4.5 cannot be applied to source records that have intrinsic value.

If the records were already identified as having intrinsic value, transfer the source records as scheduled. Otherwise, consult your [NARA Appraisal Archivist](#) to determine if a new schedule is required.

**12. How do I know if my agency's source records have intrinsic value?**

Intrinsic value is the archival term applied to permanently valuable records with qualities and characteristics that make the records in their original physical form the only archivally acceptable

form for preservation. Although all records in their original physical form have qualities and characteristics that would not be preserved in copies, records with intrinsic value have them to such a significant degree that the originals must be saved. You can find more information here: [Appraisal Policy for the National Archives, Appendix 3: Qualities and characteristics of records with intrinsic value](#).

Records schedules or appraisal memos sometimes indicate if records have intrinsic value. Agencies should consult with their [NARA Appraisal Archivist](#) for additional guidance.

### **13. What authority do I use for the digitized records?**

GRS 4.5 does not apply to any digitized versions of the records. GRS 4.5 only applies to source records. You may not apply GRS 4.5 to unscheduled records.

The agency records schedule approved for the source records applies to the digitized records as long as the digitization standards are met.

### **14. GRS 4.5 authorizes the destruction of source records after validation. Can my agency keep the source records longer?**

Yes. The GRS allows for longer retention if the records are required for business use. In addition, legal constraints may make it necessary for an agency to retain source records for some time after digitizing. Consult with legal counsel to ensure there are no concerns associated with rights and interests, appeal rights, benefits, national security, litigation holds, or other similar issues affecting the source records retention period. Agencies should also analyze the costs of storing, maintaining, and executing discovery against records in multiple formats.

### **15. How do GRS 5.2, item 020 for intermediary records, and GRS 4.5, item 010 for source records relate to each other?**

GRS 4.5, item 010, covers source records. Source records are the records 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.

GRS 5.2, item 020, covers intermediary records, or records used to create a subsequent record; for example, paper forms that are manually entered directly into a system or electronic data used to input information into a system.

See also Frequently Asked Questions (FAQs) About GRS 5.2. Consult the GRS Team ([GRS\\_Team@nara.gov](mailto:GRS_Team@nara.gov)) for additional guidance.

### **16. Are there GRS items that cover other copies of digitized records?**

Yes, certain copies of digitized records are covered by other GRS items:

- Copies used for quality control or quality assurance purposes. (Transitory Records: DAA-GRS-2017-0003-0001, GRS 5.2, item 010)
- Backup copies of permanent records (DAA-GRS-2013-0006-0007, GRS 3.2, item 050)

- Backup copies of temporary records (DAA-GRS-2013-0006-0008, GRS 3.2, item 051)

**17. My agency re-digitized source records and now has two sets of digitized records: the first set that did not meet NARA standards and the second set that did. Can I apply the GRS to that first set of non-compliant digitized records?**

No. The GRS 4.5 applies to the source records used to create digitized records that meet the digitization standards. The GRS 4.5 does not apply to digitized versions of the records that don't meet the standards.

If the non-compliant copies of digitized records are preserved only for convenience, they are non-record, and could be destroyed according to agency policy.

If copies of non-compliant digitized records are required for only a short time and are not required to meet legal or fiscal obligations or serve as evidence of decision-making, then they could be destroyed using GRS 5.2, item 10. In this scenario, the first set of digitized versions may be considered transitory records.

Agencies should discuss this with their counsel before proceeding. For example, if an agency used non-compliant scans to determine benefit eligibility, they may need to retain that copy for some additional amount of time in order to fully understand what information was available to the person making the benefits determination.

**18. Where can I find more information?**

More information about the digitization of records is available on NARA's [Digitization of Federal Records website](#).