

Frequently Asked Questions (FAQs) about GRS 5.4, Facility, Equipment, Vehicle, Property, and Supply Records

QUESTION RELATED TO GRS 5.4, ITEM 010

1. Why does this item exclude General Services Administration (GSA) Global Supply requisition and supply records and Defense Logistics Agency (DLA) military supply records?

As noted in the item's Exclusion 3, these are program records of agencies whose mission is supply. The GRS does not cover agency mission records; agencies must schedule such records. Also, 40 U.S.C.

501(a)(2) states that the Department of Defense can opt out of GSA procurement processes. A 1971 agreement between GSA and DLA sorted out which agency supplies which goods to military establishments, based on whether the goods are deemed "military" in nature. For instance, reams of paper are not "military" but ammunition is. For this reason, these GSA and DLA records have agency-specific requirements that also make them inappropriate for a GRS.

QUESTIONS RELATED TO GRS 5.4, ITEM 020

1. Why does this item require agencies to transfer land title records to the new owner?

Once the Federal Government releases land to another owner, its title records lose their legal value for the Federal Government, and eventually informational value, too. But there is no good reason for the Federal Government to destroy these records when the new or subsequent owners, as the new stewards of the land, may have business use for them.

2. Why does this item not cover records of real property disposition (Exclusion 2)?

This item covers only very specific documents about real property *ownership*, not real property *disposition*. Disposing of real property by sale and donation is often the subject of national or local controversy. We cannot treat land disposition records consistently as a single series with identical value under all circumstances. They are therefore not appropriate to include in the GRS.

3. My agency has a schedule for real property disposition case files. Does this item supersede it?

No. As discussed in question 3, this item covers only very specific documents about real property *ownership*, not real property *disposition*. Real property disposition records merit unique appraisal.

4. My agency has a schedule to permanently retain real property disposition case files. My files incorporate the records item 020 says are temporary (abstract or certificate of title). Can I transfer these temporary records to NARA as part of the permanent files?

Only permanent records should be sent to the National Archives (NARA). If your real property disposition file has simply been incorporated into your ownership file for the same land/building, you should remove the temporary ownership records prior to proposing to transfer the permanent disposition records to NARA. The GRS instructs you to send these ownership records—

abstract or certificate of title—to the new owner of the land. These records should not be in the files you transfer to NARA.

QUESTION RELATED TO GRS 5.4, ITEM 030

1. Why don't you include vehicle title in the list of covered records?

We do not include vehicle title as a covered record because it does not have the same disposition instruction as the other records. State law requires the seller to give a vehicle title to the new owner in the sale or release process. The GRS has no authority either to require transfer of a vehicle title, or to authorize its destruction.

QUESTIONS RELATED TO GRS 5.4, ITEMS 050 AND 051

1. Agencies must keep records in item 051 until a structure is removed from Federal ownership. However, the Government will never get rid of certain buildings. Isn't this *de facto* permanent retention?

The business use of records described in item 051 may stretch over many decades, but still ends with demolition, sale, *etc.* of the structure to which the records relate. However, Exclusion 2 makes clear that records documenting buildings of historical, architectural, or technological significance must instead be scheduled and appraised to determine their value, which might be permanent in some cases.

2. Why would an agency want to keep all construction records until a facility is razed? Isn't that excessive?

These items do not require all construction records to be retained for the life of a facility. Many records exist primarily to document the financial management of the contract(s) under which a building is erected. These are disposable under GRS 1.1, item 010, as noted in Exclusion 1. But other construction records have enduring value to a physical plant's maintenance crew. As-built drawings often vary significantly from final design drawings, reflecting numerous change orders. As a result, these records are useful for the life of the facility.

3. How can I tell if a building is historically or architecturally significant?

Criteria for establishing a structure's historical or architectural significance are available in the National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation," published by the National Park Service, which is responsible for the National Register of Historic Places.

QUESTIONS RELATED TO GRS 5.4, ITEM 100

1. 14 CFR 91.417 contains a detailed list of records that agencies must retain and transfer with an aircraft when selling it. Why are these records not included in the GRS, citing 14 CFR 91.417 as the legal authority?

The records 14 CFR 91.417 requires agencies to transfer with an aircraft upon sale fall into two

categories. The first is certain maintenance records, which the GRS covers under item 100. The second category is time-specific records that cannot be compiled as a discrete series until very near the date of transfer. A GRS item for records an agency creates and compiles for the sole purpose of immediate transfer outside of agency ownership would be pointless. The GRS does not cite 14 CFR 91.417 as a legal authority because, in keeping with GRS policy, we reference CFR and U.S. Code citations only if they directly address the length of time agencies must maintain the records.

2. In the disposition instruction for item 100, what does “disposing of aircraft” mean?

For purposes of this disposition instruction, “disposing of aircraft” means either its destruction or its sale, donation, or other permanent transfer to a non-Federal entity.

QUESTION RELATED TO GRS 5.4, ITEMS 100, 110, AND 120

1. Why do items 100 and 120 exclude records of the Air Force, Navy, Army, and Federal Aviation Administration, and item 110 exclude records of vehicles designed for military use?

Aircraft used by military branches and FAA are more likely to be involved with agency mission. A similar situation applies to item 110. Military organizations’ fleets contain many commonly used vehicles such as cars and trucks, and records relating to such vehicles are covered by item 110. But the sole purpose of some vehicles (for example, amphibious assault vehicles) is intertwined with agency mission. They are therefore excluded from item 110. Mission records are always scheduled by the creating agency.

QUESTION RELATED TO GRS 5.4, ITEM 140

1. How does this item relate to the very similar GRS 5.6, item 100, Accident and incident records?

Many vehicle accidents are likely to create records in both the office that manages the fleet and the office that deals with investigations. This item (GRS 5.4, item 140) schedules the former. GRS 5.6, item 100, covers the latter. These files may contain many records in common, but agencies retain them to document different business functions. For that reason, we have assigned them different retention periods based on agency need for the records.