

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

INTRODUCTION

1. What is the purpose of DOE 5.2?

The purpose of this schedule is to cover records related to transitory and intermediary records that are not covered by GRS 5.2.

2. From whom may I request more information about this schedule?

Contact the DOE Records Disposition Schedule Technical Team at DOERM@hq.doe.gov with any questions about this schedule.

3. How does DOE 5.2 differ from the old DOE Administrative Schedule?

- Item 010 - Data Marts and Warehouses

Item 010 is a records disposition schedule item that addresses data added, copied, or downloaded into information systems for analysis and reporting purposes. Reports and analyses created from this data are not covered by this item; data owners are responsible for scheduling those outputs based on their content. It utilizes the GRS authority for GRS 5.2, item 020 for its disposition, but it does not replace GRS 5.2, item 020.

4. Items Cross-Walked to GRS 5.2:

- Item 010 – Transitory Records

Two (2) DOE records disposition schedule items have been crosswalked to GRS 5.2, item 010. ADM 1.58 has been crosswalked both to this item and item 020. Previously:

- ADM 1.58 (in part)
- ADM 23.10a

- Item 020 – Intermediary Records

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- ADM 1.58 (in part)
- ADM 23.10b

5. What updates to the GRS have DOE modified for DOE use?

- Item 010 – Transitory Records

The retention period has been updated from "Destroy when no longer needed for business use, or according to agency predetermined time period or business rule" to a fixed standard: **Destroy when 180 days old**. This change eliminates ambiguity by establishing a consistent, agency-wide cutoff rather than relying on variable business-need determinations.

- **Item 020 – Intermediary Records**

The retention period has been updated from "Destroy upon creation or update of the final record, or when no longer needed for business use, whichever is later" to a fixed standard: **Destroy when 30 days old (electronic) or 30 days after verification (source documents)**. This change provides a clear, uniform timeframe for disposition rather than tying destruction to the variable completion of a subsequent record.

QUESTIONS ABOUT ITEM GRS 5.2, ITEM 010 – TRANSITORY RECORDS

1. What are examples of transitory records?

Transitory records are needed only for a short period — generally less than 180 days. They are not required to meet legal or fiscal obligations, and they do not initiate, sustain, evaluate, or provide evidence of agency decision-making. The following are common examples of transitory records. Note that each example must still meet the conditions described above to qualify:

- Transmittal documents such as emails, 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 those for custodial services or minor repair work
- General information request files that require no policy decision, special compilations, or research
- Ad-hoc reports — including electronic system queries — used for one-time reference only
- Data output files from electronic systems used for short-term reference or information sharing

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"?

A record copy is not defined by uniqueness — receiving a copy of a document does not automatically make it a non-record. If a received item is used for decision-making or to take action, it qualifies as a record. Only copies kept purely for reference are non-records. These types are included as transitory record examples to provide clarity for agencies that may otherwise be uncertain whether to declare them non-records.

3. When are electronic messages and email considered transitory?

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

- Messages used to coordinate schedules, appointments, or events
- System-generated reminders, alerts, bounce-back notices, and "for your information" messages that require no action from the recipient

However, an electronic message or email may only be deemed transitory if it does *not*:

- Contain information necessary to adequately and properly document the agency's activities and functions
- Provide documentation of agency decisions and commitments reached orally (in person, by phone, by video, or in a conference setting)
- Convey information of value about agency activities that would add to a proper understanding of agency operations and responsibilities
- Document the formulation or execution of policies and decisions
- Denote actions or decisions taken by agency Capstone officials (as 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 scheduled as permanent may sometimes be lost, corrupted, or otherwise unusable. In such cases, a data output file containing summarized information may be the only remaining accessible version of that record. NARA may wish to accept such an output in place of the unavailable permanent master record. This exclusion does not require agencies to retain output records as a precaution against future inaccessibility of the permanent record. It only means that if the master file is already inaccessible and output records exist, agencies should contact NARA to determine whether those outputs should be transferred instead.

QUESTIONS ABOUT GRS 5.2, ITEM 020 – INTERMEDIARY RECORDS

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

Intermediary records exist solely to facilitate the creation of subsequent records. They must not be required to meet legal or fiscal obligations, and they must not initiate, sustain, evaluate, or provide evidence of decision-making. Common examples of intermediary records include:

- Ad-hoc reports — including electronic system queries — used to produce a subsequent report
- Drafts not intended for further use that contain no significant changes or annotations and are not required to document business activities
- System printouts or versions used to verify data or respond to queries, where these are not part of regular reporting procedures and are not needed for ongoing use
- Spreadsheets or word processing documents that have been fully incorporated into a separate final document

- Audio and video recordings of meetings that have been fully transcribed, or that were created explicitly to produce detailed meeting minutes — once those minutes have been finalized (Note: "Meetings" does not include interrogations, interviews, or other situations in which individuals are formally questioned.)
- Dictation recordings
- Paper or analog input records — such as paper forms — that are not digitized and are used solely for data entry, where all significant information has been captured 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 created solely to extract data for inclusion in another system (this item covers the digitized version; the source record is governed separately and 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

2. What types of records do not fall under this item?

The following record types are not covered by this item:

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

3. What are source records in the context of this item?

The term "source record" appears in two distinct contexts within the GRS, each with a slightly different meaning: **Intermediary source records (input records)** are the records from which information in an electronic system originates. These may be electronic — such as upload files staged for system ingest — or paper and analog, such as forms from which data is manually entered into a system. These input records are covered by GRS 5.2, item 020. **Digitization source records** are the originals from which a digitized version is created, where the digital copy replaces the source as the official record. These are scheduled under GRS 4.5, item 010, with certain exclusions. The source record in this context is the copy that was actively used in the course of agency business. Note that not every data entry process creates a separate source record. For example:

- A user enters information directly into a system via an online form, and the system captures the data as it is entered.
- Data moves automatically between systems with no associated data file, such as through file or data syncing.

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

Yes. A "pass-through system" — one whose sole function is to receive and integrate data from two or more other systems and export the result to a separate, independent system — contains only intermediary records. GRS 5.2, item 020, covers the content of such systems.

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

Yes. The GRS disposition instructions are flexible enough to support records received under an information-sharing agreement or data license. The agency should destroy or return those records in accordance with the terms of the agreement. Any subsequent records the agency generates from those inputs should be scheduled on an agency-specific records schedule.