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Date: June 7, 2017
Appraiser: Laura Adams McHale, ACRA
Agency: General Records Schedules (GRS)
Subject: DAA-GRS-2017-0009-pending

[AMR 6/8/2017](#)

INTRODUCTION

Schedule Overview

GRS 6.3 Information Technology Records

Additional Background Information

This schedule provides disposition authority for records ancillary to an agency's primary mission focus in the area of information technology (IT). In other words, these are records which support an agency accomplishing its mission, but are neither mission nor administrative in nature. The GRS covers mission support records when their business and historical value can be established Government-wide; information technology is such an area. This schedule covers items from old GRS 27, Records of the Chief Information Officer (Items 1, 2, 3, and 5).

There are three major changes to the former GRS 27 items found in this new schedule. First, we made this GRS more functional by placing it under the GRS 6.0 Mission Support category and eliminating the organizational-based title construct of the old schedule titled, Records of the Chief Information Officer.

Second, we combined GRS 27, items for IT program planning (GRS 27, item 1) and IT Capital Investment (GRS 27, item 3) based on the feedback from agencies and their experiences in implementing old GRS 27. Third, we increased the retention of CIO Committee Records (GRS 27, item 5) from 5 to 7 years and aggregated the records into the first item, also at the request of subject matter experts within agencies. NARA added no new items to the GRS with this schedule.

We developed this schedule with assistance from the US Department of Transportation, Tennessee Valley Authority, Social Security Administration, National Archives and Records Administration, Institute of Museum and Library Services, U.S. Securities and Exchange Commission, Department of Homeland Security, Veterans Health Administration - US Department of Veterans Affairs, Central Intelligence Agency, US Department of Energy, US Department of Justice, and National Aeronautics and Space Administration.

Overall Recommendation

I recommend approval of this schedule.

APPRAISAL

Item 0001 (GRS 6.3, item 010): Information Technology program and capital investment planning records.

Records covered include IT program planning records coming out of the program management and administrative processes taken before making significant investments in information technology (planning), the documentation of the Capital Planning and Investment Control (CPIC) process (acquisition), programmatic records evaluating the results of investments (governance), and CIO committee records. Such committees are typically headed by the agency CIO and may include members from headquarters, bureau, and field office IT programs as well as related stakeholders in the agency. Records reflecting executive decision-making are covered by other agency-specific schedules.

During agency review, agency subject matter experts stated there was no real substantive difference in how they use the records covered by the three old items and that they should be combined. We came to the same conclusion after reviewing the dossier for these items, as well as the requirements set forth by the Clinger Cohen Act of 1996 and Federal Information Technology Acquisition Reform Act (FITARA). Thus, the coverage of the new item has not changed significantly, though it has been updated to cover the records of agency program planning measures to meet governance requirements coming out of recent revisions to OMB Circular A-130, “Managing Information as a Strategic Resource” and the new OMB M-15-14, Management and Oversight of Federal Information Technology which provides implementation guidance for activities governed by the FITARA, passed by Congress in December 2014.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

*Previously approved as temporary.

GRS 27, item 1 (N1-GRS-04-4, item 1) – 7 years

GRS 27, item 3 (N1-GRS-04-4, item 3) – 7 years

GRS 27, item 5 (N1-GRS-04-4, item 5) – 5 years

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. The retention period has not changed for the records covered by GRS 27, items 1 and 3. The previous disposition stated “Destroy/delete when 7 years old or when no longer needed, whichever is later.” The changes we have made are to aggregate three old GRS items (GRS 27, items 1, 3 and 5), remove the annual cutoff statements which had been part of both superseded GRS 27, items 1 and 3, update the description to reflect recent Office of Management and Budget requirements, and add the flexible retention statement to enable agencies to keep these records longer should their business needs warrant longer retention than 7 years. In addition, this item now incorporates GRS 27, item 5, CIO Committee records. We have increased the retention from 5 to 7 years to ensure committee records are maintained for as long as program planning and capital investment records. We have also added the flexible retention statement to these records, so agencies may now keep them longer than 7 years, if needed, rather than destroying them when five years old. The 7-year minimum retention ensures the availability of records for a period of time sufficient to allow budgetary and programmatic oversight of the agency's IT capital investments.

Media Neutrality: Approved

Item 0002 (GRS 6.3, item 020): Enterprise architecture records.

The records covered by this item are the same as those covered by GRS 27, item 2, Enterprise Architecture Records.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

*Previously approved as temporary.

GRS 27, item 5 (N1-GRS-04-4, item 2) – 7 years

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. The retention remains essentially the same with the only difference being an update of the disposition instruction language from “Destroy/delete when 7 years old or when no longer needed, whichever is later.” to “Destroy 7 years after creating a new iteration of the enterprise or information architecture, but longer retention is authorized if required for business use.”

Media Neutrality: Approved



LAURA ADAMS McHALE
Appraiser