



NARA Federal Electronic Records Modernization Initiative (FERMI)

Use Cases for Disposal

March 2021

Disposal refers to the destruction of records that have met their retention period and no longer have business value to the organization. Records that meet these conditions are destroyed in accordance with their records retention schedule using methods outlined in [NIST Special Publication 800-88](#).

Below is the list of use cases and associated business scenarios for the disposal of electronic records.

ERM.030 - Electronic Records Disposal

- ERM.030.L1.01. Notify business owners of electronic records eligible for disposal
- ERM.030.L1.02. Dispose of approved electronic records
- ERM.030.L2.01. Change the retention period of temporary electronic records approved for disposal to accommodate an order, law, or business justification

CONSIDERATIONS FOR SPECIFIC ELECTRONIC RECORD TYPES

The use cases and workflows are written from a high-level perspective and are intended to cover all types of electronic records. The base level requirements for all electronic records are the same: records must be captured, managed, and disposed or transferred to NARA at the end of their lifecycle. It is an assumption that different types of electronic records will require different approaches to management. This is important to remember when using the use cases to demonstrate how vendors and service providers meet the requirements. The steps through the lifecycle can be done automatically, semi-automatically or manually. While NARA would like to see agencies move toward full automation, agencies may not be in the position to do this due to limited resources or other constraints.

The [Business Lifecycle and Business Capabilities](#) document identifies the Records Disposal functions to include Records Disposal Eligibility, Records Disposal Approval, Records Disposal Action, and Temporary Records Retention Period Change. Together, these activities provide record management controls to ensure the appropriate disposal of Federal electronic records. As explained in the Electronic Records Management Use Cases Overview, agencies may have different approaches for how they handle the disposal of electronic records. Smaller agencies may have all disposal approvals centralized in the records management program. Large agencies may have a decentralized approach with disposal processed by records liaison officers within individual bureaus, offices, or locations. Ideally, agencies will have a disposal program in place to manage the disposal of both electronic and physical records.

Agencies can decide on the level of review needed for disposals. In some cases, agencies may only need the Agency Records Officer or designated official to approve the disposal. In most cases, agencies should have at least the business owners and the ARO approve of the disposal. Many agencies also include their legal counsel in order to ensure none of the records eligible for disposal are on litigation hold. Agencies should include legal counsel in the disposal process, or at a minimum, have them review and approve of the disposal process if they do not approve all disposals. Agencies should also consider whether they will allow end users to execute disposal or have a records management professional or in some cases, IT, execute the disposal.

Below are considerations for specific types of records. See the Electronic Records Management Use Cases Overview Appendix for definitions of specific record types.

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Record Type	Capture Considerations for Record Type
Cloud Services	<p>Increasingly, agencies are using cloud services for all aspects of their IT infrastructure, including to store and maintain records. Agencies are moving data centers into cloud storage so they do not have to maintain the centers themselves. When agencies dispose of records in cloud services, there are some things agencies should consider. Agencies should ensure there is language in the contract with the cloud provider stating they can meet NARA’s requirements for disposal. Often cloud providers may maintain backup copies of records for certain period of time after records are disposed. Agencies should ensure cloud providers dispose of all copies of records, including backups. If copies are not disposed of in accordance with the agency retention schedule, they will be subject to FOIA and discoverable.</p> <p>Agencies should also consider whether they will allow a cloud provider to dispose of records automatically once they are eligible for disposal or should they get approval from the agency first. In some cases, agencies may want to have a Federal employee execute the disposition. This should also be included in contract with the cloud provider.</p>
Structured data	<p>Structured data could reside on premise or in the cloud. If they are in the cloud, agencies should review the consideration under Cloud Services. If the database is on premise, agencies must ensure they are disposing of records in the same way they would for records in the cloud. Agencies should ensure all copies of records are being disposed at the time of disposition. Agencies should work with database owners in IT as well as the business owners when disposing of records. It may be the IT staff executing the disposition, so IT staff should work with the ARO to ensure they are meeting NARA requirements when deleting records in databases. AROs may also work with database business owners to ensure they no longer have need for the records. It’s also important for agencies to consider what other systems the databases links to. It may receive data from or feed into other databases. Agencies should review the records in the other databases to make sure they will still have a complete record for records that are not yet eligible for disposition. They should also ensure all copies have been disposed.</p>

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Office Management Applications	Office Management Applications include word processing and presentation applications, such as Microsoft Word and PowerPoint and Google Docs. Some of these documents may be considered transitory or drafts and can be disposed when no longer needed. Others may be considered official records. They could be stored in an ERMS, on a shared drive, in the cloud, on an end user’s computer or on a peripheral storage device. As with other formats, it’s important to ensure all copies of records are disposed of at the same time. With word processing records, there could also be physical copies which should also be destroyed. This may require coordination with records custodians and business owners to ensure all copies are properly disposed. When executing the disposal of office management application records, it may require coordination with end users as well as business owners. Often, end users will know if they have eligible records on the network drive, shared drive, or on a peripheral device such as a thumb drive or external hard drive. The agency will have to decide if they will allow end users to execute the disposal or if they will have records management staff or IT execute the disposal. The ARO may work with records custodians to ensure the disposition of these records are properly executed at the end user level.
Digital Media (Photo)	Digital media (photo) records should be disposed of at the end of their records retention period just like any other record. Multiple copies of photos may be stored in different places such as a shared drive, a cloud application, or the device that took the photo. Agencies should ensure all copies are destroyed at the end of the retention period.
Digital Media (Audio)	Digital media (audio) records should be disposed of at the end of their records retention period just like any other record. Multiple copies of audio may be stored in different places such as a shared drive, a cloud application, or the device that recorded the audio. Agencies should ensure all copies are destroyed at the end of the retention period.
Digital Media (Video)	Digital media (video) records should be disposed of at the end of their records retention period just like any other record. Multiple copies of audio may be stored in different places such as a shared drive, cloud application, or the device that recorded the video. Agencies should ensure all copies are destroyed at the end of the retention period.

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Electronic Messages	Electronic messages include email, instant messages, chat messages, text messages, voicemail messages, and other messages that meet the definition of Federal records. The steps for disposal of text messages may be different than the approach for email. Agencies should consider if they will allow for automatic disposal of electronic messages or if they will have a review process. Some agencies use a Capstone approach for email and automatically dispose of email after a certain retention period in accordance with their schedule or GRS 6.1. Others may still have a period of review before disposing of the email. For text messages and chat, agencies must ensure the texts and chats are deleted from the phone as well as by the service provider/carrier. Agencies should review their service provider's contract and ensure disposal requirements are included.
Engineering Drawings	Engineering records should be disposed of at the end of their retention period just like any other record. If engineering records are created and maintained in systems that store the component parts in a database, agencies will need to ensure the components stored within the database are also destroyed at the end of the retention period.
Shared Drives	Shared drives, or network drives, are storage spaces where end users can store and share files, including records. They can reside on premise or in the cloud. Many agencies maintain records on shared drives and apply retention schedules to records on shared drives. When disposing of records on shared drives agencies must decide how to identify records for disposal and determine who need to approve the disposal of the records. Often multiple end users or teams will have access to the record and it may not be clear who owns the record. Agencies may work through their records liaison officers to identify records eligible for disposal. Agencies may use content analytics tools to help identify records eligible for disposal. This can also help find duplicate records and ensure they are all disposed of at the same time in accordance to the agency retention schedule. This can also help agencies identify records on disposition hold. Agencies should decide if they will allow individual users to execute disposition or have an ERM professional dispose of the records.

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Social Media	<p>Social media content is dynamic and may be continually updated. It is best practice for content created in social media platforms to remain there for the life of the platform or service. Social media differ from other types of records in that they are not intended to be deleted from the platform on which they were created. This may make disposal of social media records more difficult than other types of records. It is hard to be certain if all copies have been deleted because of the sharing nature of social media. Users may copy a post or tweet thousands of times. Agencies are responsible for managing the record under their control and they should be disposed of in accordance with the records retention schedule. Agencies should post their social media retention policy so they public knows who the records will be managed and eventually deleted. A social media capture tool may help agencies more easily manage their long term and permanent social media records. Messages sent through social media should also be managed in accordance with the agency's retention schedule.</p>
Websites	<p>Agencies must manage website-related records that result from agency web operations including web content records and website administrative records (see NARA Guidance on Managing Web Records). It is a best practice for website content to remain accessible to the public and for agencies to explain why content is removed. There is an expectation from users that content will be available for the foreseeable future. Agencies should assume content posted on agency website platforms are records. From there, they can move forward with determining the function of web pages and the scheduling and retention process. It is likely the case that not all website records must be kept forever. For these temporary websites, agencies should post their intention to delete the websites before they execute the disposal. The notice should explain these websites are being deleted in accordance with the agency retention schedule. Like social media records, agencies cannot be certain all copies of the website records have been deleted. Members of the public may make copies of the websites. However, agencies should follow their retention schedule, and delete eligible website records under their control.</p>

USE CASES FOR DISPOSAL AND WORKFLOWS

ERM.030 – Use Case for Electronic Records Disposal	
Enabling Function: Electronic Records Disposal	
<i>Note: The ERM functions affect every other Federal Functional Area in that all agency mission support activities create electronic records. The Enabling Functions provide support to other Functional Areas and should be combined into their use cases to reflect where records are created and how they are captured and managed.</i>	
Business Scenario(s) Covered	
<ul style="list-style-type: none"> • ERM.030.L1.01. Notify business owners of electronic records eligible for disposal • ERM.030.L1.02. Dispose of approved electronic records from agency systems • ERM.030.L2.01. Change the retention period of temporary electronic records approved for disposal to accommodate an order, law, or business justification 	
Business Actor(s)	
Agency Personnel, Business Process Owner, Information System Owner, Agency Records Management Staff	
Synopsis	
Once temporary electronic records have been managed through the Maintenance & Use phase, they enter the Disposal phase. The first process starts with notifying business owners that electronic records are eligible for disposal. This process includes determining which electronic records have met their retention period, identifying business owners of electronic records eligible for disposal, and notifying the business owners. The next process covers disposing of the electronic records from the agency systems. This process consists of receiving notification from business owners that electronic records are approved for disposal, identifying all approved records that will be disposed, notifying the Agency Records Officer of the records approved for disposal, receiving approval from the Agency Records Officer to proceed with the disposal, and disposing of the approved records from the agency systems. The last process explains how to change the retention period of temporary records to accommodate an order, law, or other business reason. This process consists of receiving a request to change the retention period, searching agency systems for the temporary records, and adjusting the retention period in those systems.	
Assumptions and Dependencies	
<ol style="list-style-type: none"> 1. All predecessor events required to trigger the Initiating Event have been completed. 2. These events can be automated, semi-automated, or be executed manually. 3. All the inputs listed in each event have been created or are available for use to execute the events. 4. There are no legal holds or information requests on electronic records eligible for disposal. 	
Initiating Event	Temporary electronic records have met their retention period.
Visual Workflow Key	

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Rectangle	Process or activity	Arrows	Flow of activity	Diamond	Decision point, usually indicated by yes/no text	Oval	Start or end of a process
							

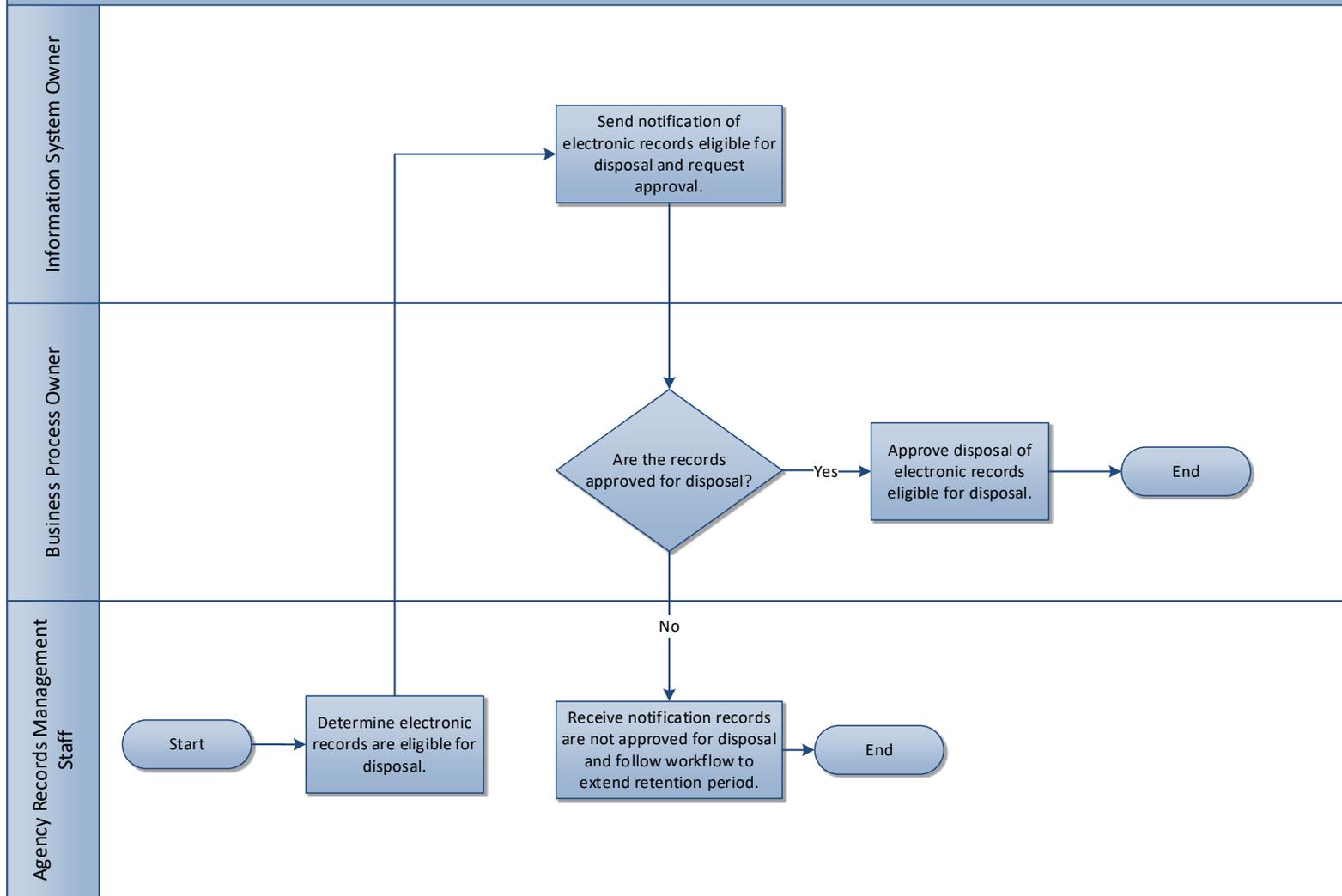
ERM.030 - ELECTRONIC RECORDS DISPOSAL

Typical Flow of Events

	ERM Event	Input(s)	Output(s) / Outcome(s)
ERM.030.L1.01. Notify business owners of electronic records eligible for disposal			
1	Determine electronic records that have met their retention period and are eligible for disposal. (ERM.030.020 – Records Disposal Approval)	<ul style="list-style-type: none"> • Agency systems • Notification records have met retention period 	<ul style="list-style-type: none"> • Identified electronic records eligible for disposal
2	Identify business owners of electronic records that are eligible for disposal. (ERM.030.020 – Records Disposal Approval)	<ul style="list-style-type: none"> • Identified electronic records eligible for disposal 	<ul style="list-style-type: none"> • Business owners of electronic records
3	Notify business owners of electronic records eligible for disposal and request approval. (ERM.030.020 – Records Disposal Approval)	<ul style="list-style-type: none"> • Business owners of electronic records 	<ul style="list-style-type: none"> • Business owners are notified

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ERM.030.L1.01 - Notify business owners of electronic records eligible for disposal

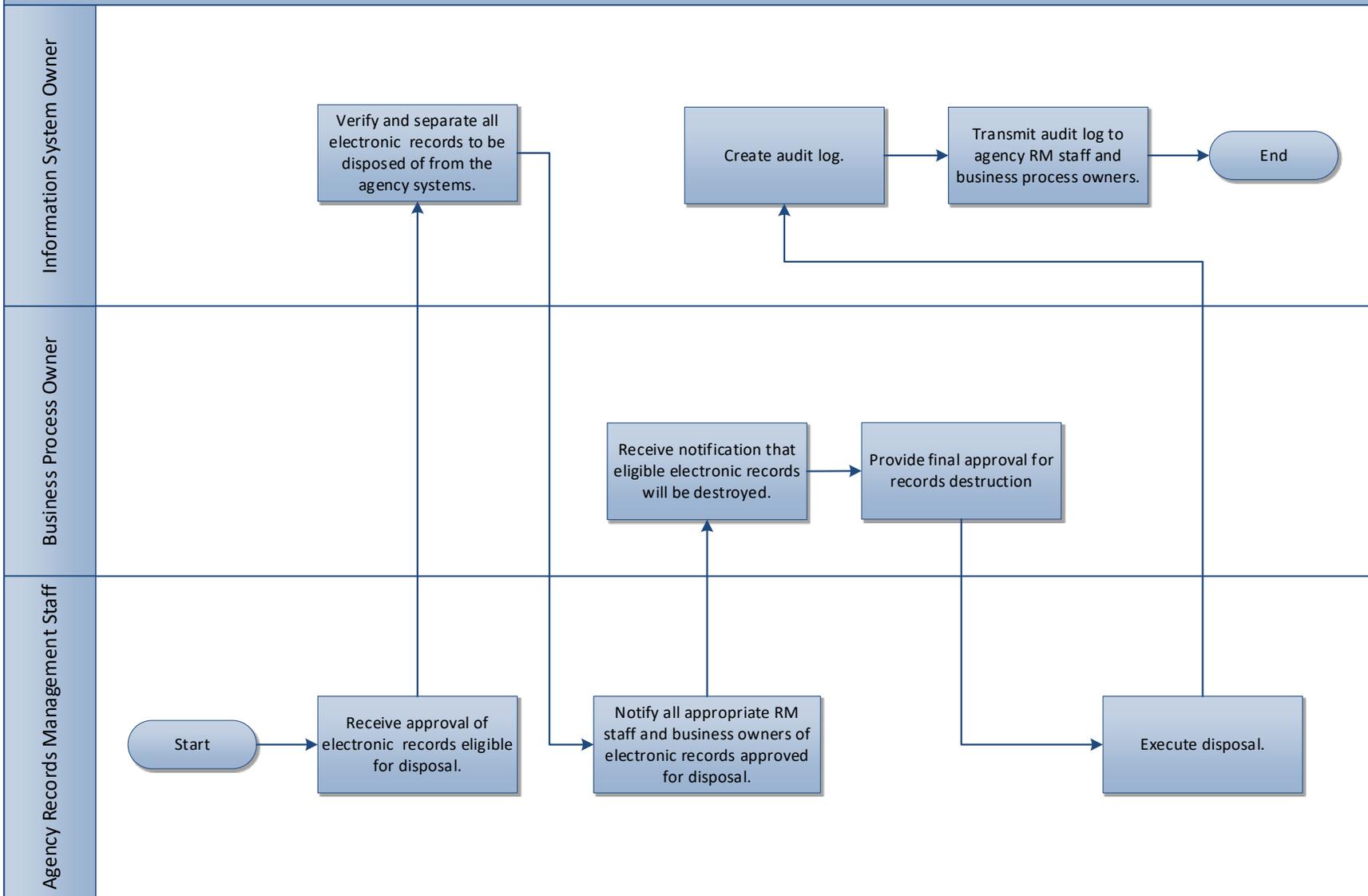


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ERM.030 - ELECTRONIC RECORDS DISPOSAL			
Typical Flow of Events			
	ERM Event	Input(s)	Output(s) / Outcome(s)
ERM.030.L1.02. Dispose of approved electronic records from agency systems			
5	Receive notification from business owners of electronic records approved for disposal. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> Approval from business owners 	<ul style="list-style-type: none"> Identified electronic records approved for disposal by business owners
6	Identify all approved electronic records that will be disposed of from agency systems. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> Identified records approved for disposal 	<ul style="list-style-type: none"> All records approved for disposal are identified
7	Notify designated approving officials of electronic records approved for disposal. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> Notification to designated approving officials 	<ul style="list-style-type: none"> Designated approving officials are notified of records approved for disposal
8	Receive approval from designated approving officials to destroy electronic records approved for disposal by business owners. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> Notification from designated approving officials 	<ul style="list-style-type: none"> Approval to dispose of records by designated approving officials
9	Dispose of approved electronic records from agency systems. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> Notification from business owners Notification from designated approving officials All records approved for disposal 	<ul style="list-style-type: none"> Approved records are disposed of from agency systems
10	Create audit log of disposed records. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> List of disposed records 	<ul style="list-style-type: none"> Audit trail of disposed records

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ERM.030.L1.02 - Dispose of approved electronic records from agency systems



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ERM.030 – ELECTRONIC RECORDS DISPOSAL			
Typical Flow of Events			
	ERM Event	Input(s)	Output(s) / Outcome(s)
ERM.030.L2.01. Extend the retention period of temporary electronic records approved for disposal to accommodate an order, law, or business justification			
1	Receive notification to change the retention of temporary electronic records. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> • Notification to change retention 	<ul style="list-style-type: none"> • ARO is notified to change retention
2	Search for temporary electronic records in agency systems that need retention period change. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> • Agency systems • Search parameters 	<ul style="list-style-type: none"> • Identified temporary records from search
3	Update retention period for temporary records. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> • Identified temporary records • Agency systems 	<ul style="list-style-type: none"> • Temporary records with updated retention periods
4	Notify business owners that retention period has changed. (ERM.030.030 – Records Disposal Action)	<ul style="list-style-type: none"> • Notification to business owners 	<ul style="list-style-type: none"> • Business owners are notified

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ERM.030.L2.01. Extend the retention period of temporary electronic records approved for disposal to accommodate an order, law, or business justification

