

Record Retention Timeframes for General PP&E Assets

Executive Summary

Background of Issue

The committee was tasked with looking into the issue of record retention timeframes and methods (hardcopy vs. electronic) for retainment that support General Property Plant & Equipment (GPP&E) reported in agencies' general purpose financial statements. This issue has multiple aspects that the committee considered: permanent GPP&E records, transactional GPP&E records, and hard copy vs. electronic records. The committee approached the task by doing extensive research on record retention practices and requirements and by looking into any guidance related to the subject in federal government and private sector accounting and other standards. In particular, the committee researched National Archives and Records Administration (NARA)'s record retention regulations and guidance applicable to federal agencies and visited with NARA's record retention specialist.

What is the Committee proposing?

Federal agencies, working together with NARA, establish retention periods for different schedules of records to serve various needs, such as maintaining relevant documentation for a sufficient period of time to protect the government's rights with respect to certain transactions or events, to support effective internal controls over a period of time, and to support assertions made, explicitly and implicitly, in annual financial statements.¹ The committee focused on the latter need. That is, management of federal reporting entities make "assertions regarding the recognition, measurement, presentation, and disclosure of information in the financial statements and related disclosures."² The five explicit or implicit financial statement assertions recognized by the AICPA and GAO include: (1) the existence or occurrence of assets or liabilities of the entity at a given date or recording of transactions over a given period of time; (2) the completeness of transactions and accounts; (3) the rights to assets and obligations incident to

¹ See 44 U.S.C. §§ 3101, 3303 (disposition schedules to reflect the "administrative, legal, research, or other value" of a record to the agency) and 3303a; GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999); *GAO Policies and Procedures Manual for Guidance of Federal Agencies*, Title 8, *Records Management* (Washington, D.C.: February 1991).

² GAO/PCIE *Financial Audit Manual*, GAO-08-585G, § 235.02 (July 2008); see AU § 326.14.

liabilities are properly represented; (4) the valuation and allocation of asset, liability, equity, revenue, and expense components are appropriately included; and (5) the financial statements present and disclose particular components properly.³ In the context of GPP&E, these assertions relate to specific qualitative and quantitative characteristics of a specific category of asset, such as the actual or potential uses of the asset, its useful life, and its acquisition cost.⁴ Further, management of federal reporting entities should exercise sound judgment when deciding what evidence (in addition to an entity's accounting records) is sufficient to support the assets reported in their financial statements. Accordingly, management of federal reporting entities must identify the types of GPP&E records to maintain and their retention periods to meet management's various needs.

The committee proposes that the retention of Federal reporting entities' GPP&E records should be consistent with the following principles:

- Records supporting the existence of a GPP&E asset; records supporting the federal reporting entity's rights, such as ownership; records supporting the completeness of GPP&E; records supporting the overall valuation of GPP&E, depreciation, and book value (whether actual or estimated historical cost); records supporting financial statement classification, description, and disclosure, such as the use(s) and useful life of the GPP&E should be retained until:
 - 10 years after the disposal of the asset for real property;
 - The later of 6 years 3 months after final payment or disposal of the asset for non-real property;
 - Examples of these types of documents include: deed/title, appraisals, architectural designs and plans, occupancy permits, condemnation, filings, official correspondence with governments, total cost spreadsheets.
 - Other examples include GPP&E records of a transactional nature, such as contracts, invoices, and payment documents. Such routine procurement files normally are subject to section 3 of this GRS or other GRS, as applicable, but the agency may determine that it is necessary to also retain any such record (high

³ AU § 326A.03-.08.

⁴ SFFAS No. 6, ¶¶ 22-45; see SFFAC No. 5, ¶¶ 18-25.

dollar, large scope) under that section to serve one or more of the purposes stated above.

Federal reporting entities should apply these record retention periods to their unique systems of records, including electronic records. For example, one or more of each of the assertion categories above could be supported with a combination of records.

By law, federal agencies are required to develop record retention schedules for all of their records not covered by the NARA general records schedules (GRS).⁵ GRS are schedules that prescribe retention periods for records of a specified form or character common to several or all agencies. NARA reviews all agency specific records schedules and they can not be implemented until NARA has approved them. Agency specific schedules can include deviations from the GRS. Once approved by NARA, retention periods in the schedules are mandatory and authorize the systematic removal of unneeded records from federal offices.⁶

The record retention schedule revisions proposed by the committee applies to both hardcopy and electronic records. However, the committee recognizes the capability to keep electronic records is becoming more common and less costly and suggests where applicable, electronic GPP&E records (financial system downloads of transactional information, etc.) should be retained for the GPP&E records retention periods. If the method for reading the format of old electronic records is no longer available, agencies should modify the records to a current readable format, if possible.

The committee proposes that its recommendations on record retention timeframes be implemented through a request from the Financial Accounting Standards Advisory Board (FASAB) to the NARA. The FASAB's request would include modifying current NARA record retention periods set out in GRS 3 to address agency's old and transactional procurement GPP&E records.

⁵ 44 U.S.C. §§ 3303; 36 C.F.R. § 1228.24(b)(2).

⁶ 44 U.S.C. § 1314; 36 C.F.R. § 1228.20(b).

Why is the Committee making this proposal?

Currently there are divergent ways in how long and the types of records federal agencies retain that support assertions related to GPP&E. This is due to the “gray area” that currently exists in federal accounting pronouncements and NARA guidance. The committee research also showed there is no clear accounting guidance on record retention. The committee proposal would standardize record retention guidance for federal agencies. This would align retention of GPP&E records in NARA with Federal Acquisition Regulation (FAR) guidance. There is existing guidance (NARA’s GRS 4 and GRS 20) on the disposal of certain GPP&E and electronic records. The committee does not propose further guidance on the disposal of GPP&E and electronic records.

How would this proposal improve Federal financial reporting?

The proposed guidance in this document does not alter existing accounting standards for GPP&E. Instead, this proposal would clarify the record retention issue associated with the current financial reporting standards for GPP&E.⁷

⁷ FASAB SFFAS No. 6, *Accounting for Property, Plant, and Equipment*, as amended.

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Description of Issue

Currently there are divergent ways in how long and the types of records federal agencies retain that support assertions related to GPP&E. This is due to the “gray area” that currently exists in federal accounting pronouncements, and NARA and agency guidance. The committee proposal would standardize record retention guidance and practices for federal agencies.

Scope

FASAB identifies different categories of PP&E.⁸ The categories have changed over time and include GPP&E – general PP&E, National Defense PP&E, Stewardship PP&E.

The committee’s research and proposal are limited to record retention guidance and practices for the GPP&E category. The recommended changes were broken down into real property and non-real property as we were trying to conform to existing written NARA guidance. The committee researched record retention guidance and practices in the federal government and the private sector and in accounting standards at a high level. The research focus was at the GPP&E level. It did not look into, at the sub-GPP&E level, the uniqueness and differences of equipment, capitalized software, capitalized leases, construction-in-progress (CIP), etc.

The committee’s proposal is not intended as guidance for the oversight community. This report was not meant to address the sufficiency of evidence to be able to draw conclusions, measure the validity of evidence, or infringe on the judgment of the oversight community. It is intended for agency management as general governmental guidance to assist with the consistency across government with GPP&E record retention.

Relevant Accounting and Record Retention Guidance

1. 2 C.F.R Section 215.53
2. 36 C.F.R Parts 1202 and 1228
3. 41 C.F.R Section 102-193.20

⁸ Page 2 of Executive Summary of Statement of Federal Financial Accounting Standards No. 6

4. 44 U.S.C. Section 2904(a) and (b) and chapters 31 and 33.
5. Budget and Accounting Act of 1921
6. FASAB SFFAS No. 6, *Accounting for Property, Plant, and Equipment*
7. FAR Subpart 4.7, 48 C.F.R. Subpart 4.7
8. IRS Publication 583 Starting a Business and Keeping Records (Revised January 2007)
<http://www.irs.gov/pub/irs-pdf/p583.pdf>
9. NARA [Introduction to General Records Schedules](#)
10. NARA [GRS 3 - Procurement, Supply and Grant Records](#)
11. NARA [GRS 4 - Property Disposal Records](#)
12. NARA [GRS 20 - Electronic Records](#)
13. OMB Circular No. A-110
14. OMB Circular No. A-123, Section II.C
15. OMB Circular No. A-130, Appendix II, and OMB Memorandum No. 00-15
16. OMB Circular No. A-133
17. OMB Circular No. A-136
18. GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999)
19. *GAO Policies and Procedures Manual for Guidance of Federal Agencies*, Title 8, *Records Management* (Washington, D.C.: February 1991)
20. Sarbane-Oxley Act of 2002, Section 802
21. SEC Final Rule on Retention of Records Relevant to Audits and Reviews
<http://www.sec.gov/rules/final/33-8180.htm>
22. SEC Regulation S-X
23. DON SECNAV Manual 5210.1

Benefits and Costs

The concept of record retention is a key element in developing substantive evidence for supporting balances on financial statements. Agencies need to have sufficient substantive evidence and it can take many documentation forms which has led to confusion in the community. Those charged with oversight of agencies [(Government Accountability Office – (GAO), and Offices of Inspector General – (OIG), and Independent Public Accountants – (IPA)] need to obtain sufficient evidence to be able to draw reasonable conclusions on which to base

their reports. Most of the work in forming an opinion on the financial statements consists of obtaining and evaluating evidential matter concerning management's assertions in the financial statements. The measure of the validity of such evidence for oversight purposes lies in judgment. Factors impacting substantive evidence include: documentation for legacy assets; support for management's assertions; and standards on record retention.

Entities are frequently unable to support legacy asset values with adequate supporting documentation. In many cases, legacy assets may be very old and source documentation to support the valuation of these assets no longer exists. Source documentation may exist, but it is in poor condition, not searchable, or a victim of agency's poor record management practices. Sometimes there is lack of sufficient agency guidance detailing the specific documentation requirements by class of asset and alternative solutions need to be derived. Alternative documentation solutions include options based on the level of existing documentation along with an agreement and understanding by all oversight entities.

The committee's proposal on record retention timeframes may assist agencies with record retention timeframes for current and old records from a cost/benefit aspect. There should be no material cost to agencies associated with modifying the record retention timeframes and the committee's proposal can be implemented either prospectively or retroactively.

Examples of Records Retention Guidance

NARA Guidance

The National Archives and Records Administration Act of 1984 amended the records management statutes to divide records management oversight responsibilities between the National Archives and Records Administration (NARA) and the General Services Administration (GSA). Under the Act, NARA is responsible for adequacy of documentation and records disposition ([44 U.S.C. 2904\(a\)](#)), and GSA is responsible for economy and efficiency in records management ([44 U.S.C. 2904\(b\)](#)). Federal agency records management programs must comply with regulations promulgated by both NARA (36 CFR Part 1228) and GSA.

GRS 3 - Procurement, Supply and Grant Records: Routine procurement files include contract, requisition, purchase order, lease, and bond and surety records, including correspondence and

related papers pertaining to award, administration, receipt, inspection and payment. For procurement or purchase organization copy, and related papers, destroy 6 years and 3 months after final payment if transactions that exceed the Federal Acquisition Regulation (FAR)'s simplified acquisition threshold and all construction contracts exceeding \$2,000. Destroy 3 years after final payment if transactions are at or below the simplified acquisition threshold and all construction contracts at or below \$2,000.

GRS 4 – Property Disposal Record: These records pertain to the sale by agencies of real and personal property surplus to the needs of the Government. The act creating the General Services Administration (GSA) transferred to the new agency the functions of the former War Assets Administration relating to property disposition. This schedule is not applicable to transaction or policy files created by the GSA and predecessor agencies, to records in the Department of the Interior relating to the public domain, and to records relating to overseas property under Department of State control. Any surplus property transaction files dated prior to the establishment of the former Procurement Division of the Department of Treasury in 1933 must be offered to the National Archives and Records Administration (NARA) for appraisal before applying these disposition instructions.

GRS 20 - Electronic Records: This schedule provides disposal authorization for certain electronic records and for specified paper, microform, or other hard copy records that are integrally related to the electronic records. This schedule applies to electronic records created or received by Federal agencies including those managed for agencies by contractors.

Federal Acquisition Regulation (FAR)

The Federal Acquisition Regulation requires that historical data be available for contracts for 6 years and 3 months after final payment.

United States Marine Corps Real Property Document Retention Checklist

U.S. Marine Corps (USMC) identifies three critical components of a real property document retention policy which it believes need to be “asserted” as a pre-requisite to proceeding with a cost efficient audit of real property line item of its balance sheet. The three critical components are as follows: (1) Create a list of approved required documents that are necessary and sufficient to support a financial audit; (2) Establish retention thresholds for the required documents; and (3) Create a checklist based on a list of approved required documents and established record

retention thresholds, and provide that checklist to USMC's component entities so they can use the checklist to support the USMC in an audit of its real property line item. When the three critical components are completed and asserted they will provide necessary and sufficient documentation and associated retention requirements for availability of future documents.

Currently there is no Department of Defense (DoD) policy on record retention requirements with regard to real property documents in supporting a financial audit.⁹ Broad guidance is available in the DoD Financial Management Regulation (FMR), Real Property Inventory Requirements (RPIR), and Construction in Progress Requirements (CIPR) documents, but these are not sufficient to define an actionable document retention policy in supporting a cost efficient financial audit.

USMC policy objectives are to achieve an unqualified financial audit opinion, while minimizing the costs and resources necessary for achieving compliance. The USMC hired consultants to help define a minimum set of documentation that is necessary, and that is collectively sufficient to satisfy the five management assertions required in financial audit, including an associated document retention policy. A useful chart was created that categorizes GPP&E records by the management assertion that they help satisfy.

The USMC project analysis, that is being reviewed internally, covers two general areas: (1) estimating the historical cost of properties where actual documentation is not available, performed by a contractor; and (2) defining the minimum documentation required to support each attribute, as well as minimum retention periods for each type of document. The value of item (2) is that it goes beyond the previous information in current guidance.

The USMC goal in this effort is to get the necessary support, through FASAB and inter-agency workgroups, to define these necessary and sufficient levels of documentation including requirements for document availability. For example, relying on the contractor analysis, the USMC observes the SECNAV Manual 5210.1 as the current authority for Department of the Navy (DON) records schedules. While the NARA issues a General Records Schedule (GRS) for

⁹ DoD Regulation 7000.14-R, "DOD Financial Management Regulation," volume 1, chapter 9, "Financial Records Retention," August 2000, states that all financial records, both paper and electronic, documenting the acquisition of DoD PP&E shall be maintained for at least the minimum period specified in the applicable GRS issued by NARA.

common records across federal agencies, U.S. Code Title 44, Chapter 33 also authorizes federal agencies to establish individual agency records schedules by submitting them to NARA for approval. The SECNAV Manual 5210.1 represents the DON's records disposition schedule that has been approved by NARA, and is therefore the Navy/USMC's governing authority for document retention periods. It has a very useful chart that sets retention periods by record group, such as permanent retention of instruments of real property ownership where records are transferred to NARA when property has been removed from DON accounts (e.g., deed/title, DD Form 1354), retention of contracting records (e.g., construction contracts, invoices) for 6 years and 3 months, and retention of documentation of official acquisition authorization/actions (e.g., condemnation filings, official correspondence) for 10 years. Until joint Navy/USMC review of SECNAV M-5210.1 is complete, USMC will set document availability requirements based on whether or not a real property asset is fully depreciated.

Memorandum of Agreement between the DoD OIG and the U.S. Army Corps of Engineers

This Memorandum of Agreement (MOA) is an example of defining the adequacy of evidence supporting beginning balances and consideration of alternative documentation and auditability of such documentation. The purpose of this MOA is to develop alternative methods to support the acquisition and capitalized improvements for real and personal property, and was signed Jun 9, 2004 by the DoD OIG and U.S. Army Corps of Engineers (USACE) in coordination with GAO. This MOA allowed for use of other internal documentation to support values of older assets (e.g., engineer estimates and legacy system conversion spreadsheets).

OMB Guidance

Office of Management and Budget (OMB) has not issued any policy or other guidance on records retention by federal entities. With regard to federal entity financial statements, OMB only goes so far in OMB Circular No. A-136, Section II.2.10, to recognize that the financial statements are "prepared from books and records of the entity." In guidance issued by OMB on electronic recordkeeping by agencies (OMB Circular No. A-130, Appendix II, and OMB Memorandum No. 00-15), OMB acknowledges the role of NARA in setting record retention periods and related records management guidance. OMB further complements the records management guidance promulgated by NARA with its guidance to federal agencies on internal

control, which reiterates Government Accountability Office (GAO)'s internal control standards for documentation and data accessibility (OMB Circular No. A-123, Section II.C).

However, OMB prescribes some records retention requirements for parties that do business with federal agencies. For example, educational institutions, hospitals, and non-profit organizations that receive federal awards (e.g., grants) must retain records as prescribed by the "Common Rule" in OMB Circular A-110 (2 C.F.R. section 215.53), typically 3 years. Likewise, those organizations that receive federal awards and undergo an audit under OMB Circular A-133 must retain a copy of their financial statements, related schedules, and the audit report for 3 years, and their auditors must retain a copy of their work papers for 3 years, unless a longer period is directed. (In addition to OMB, other agencies often prescribe certain record retention requirements for parties that do business with the government, such as federal contractors under Federal Acquisition Regulation (FAR) Subpart 4.7, 48 C.F.R. Subpart 4.7.)

GAO, Audit, and Regulatory Requirements

Pursuant to the Budget and Accounting Act of 1921 and later statutes, GAO promulgated accounting and related recordkeeping requirements for agencies relating to the accounts of accountable officers (such as disbursing officers) and the related schedules, vouchers, and other supporting documentation, such as contracts. GAO issued this guidance because they audited each of these accounts and each of the transactions related to the accounts. In 1950, the requirement for GAO to audit each account was eliminated, but GAO retained the authority to periodically audit them. Therefore, GAO continued to prescribe the accounting and recordkeeping requirements. In addition, until 1996, GAO promulgated recordkeeping requirements related to claims by and against the government because GAO settled most claims. See 44 U.S.C. Section 3309. (In 1996, the claims settlement function was transferred from GAO to various executive branch agencies.)

GAO's accounting and recordkeeping authorities are concurrent with NARA's authorities to promulgate and approve records disposition schedules. (GSA also issues records management program guidance to agencies, but not disposition schedules.) See 41 C.F.R. Section 102-193.20. Guidance contained in Title 8 of GAO's *Policies and Procedures Manual for Guidance of Federal Agencies*, which was last issued to federal agencies in 1991, summarizes GAO's

authority and GAO's relationship to NARA's records disposition schedules. As explained in this guidance, GAO relies primarily on NARA's General Records Schedules for record retention periods. In cases where agencies want to deviate from these schedules, they need GAO approval. *See* 36 C.F.R. Section 1228.22(f). GAO does not separately publish schedules or record retention periods.

Securities and Exchange Commission Retention Requirements on Records Relevant to Audits and Reviews

Effective March 3, 2003, Securities and Exchange Commission (SEC) adopted rules requiring accounting firms to retain for seven years certain records relevant to their audits and reviews of issuers' financial statements.¹⁰ Records to be retained include an accounting firm's work papers and certain other documents that contain conclusions, opinions, analyses, or financial data related to the audit or review. Compliance with this rule is required for audits and reviews completed on or after October 31, 2003. As mandated by section 802 of the Sarbanes-Oxley Act of 2002 ("Sarbanes-Oxley Act" or "the Act"), SEC amended Regulation S-X to require accountants who audit or review an issuer's financial statements to retain certain records relevant to that audit or review. These records include work papers and other documents that form the basis of the audit or review, and memoranda, correspondence, communications, other documents, and records (including electronic records), which are created, sent or received in connection with the audit or review, and contain conclusions, opinions, analyses, or financial data related to the audit or review. To coordinate with forthcoming auditing standards concerning the retention of audit documentation, the rule requires that these records be retained for seven years after the auditor concludes the audit or review of the financial statements, rather than the proposed period of five years from the end of the fiscal period in which an audit or review was concluded. As proposed, the rule addresses the retention of records related to the audits and reviews of not only issuers' financial statements, but also the financial statements of registered investment companies.

Section 802 of the Sarbanes-Oxley Act is intended to address the destruction or fabrication of evidence and the preservation of "financial and audit records." SEC directed under that section to promulgate rules related to the retention of records relevant to the audits and reviews of

¹⁰ SEC Final Rule on Retention of Records Relevant to Audits and Reviews (Effective March 3, 2003)

financial statements that issuers file with the Commission. Neither section 802 nor the final rule exempts auditors of foreign issuers' financial statements.

The availability of documents under this rule will assist in the oversight and quality of audits of an issuer's financial statements. Increased retention of identified records also may provide critical evidence of financial reporting impropriety or deficiencies in the audit process.

Internal Revenue Service Record Retention Requirements for Business Property

Internal Revenue Service (IRS) record retention on business property requires keeping records relating to property until the period of limitations expires for the year in which business disposes of the property in a taxable disposition.¹¹ These records must be kept to figure any depreciation, amortization, or depletion deduction, and to figure the basis for computing gain or loss when a business sells or otherwise disposes of the property.

AICPA Record Retention Guidance

The committee researched applicable AICPA and related auditing standards for information related to audit documentation and audit evidence. The auditing standards provided no specific guidance for record retention guidance.

International Financial Reporting Standards Record Retention Guidance

The committee researched International Financial Reporting Standards (IFRS) that the International Accounting Standards Board (IASB) and its predecessor organizations issued, and the committee did not find any IFRSs for retaining records supporting general, property, plant, and equipment on the financial statements. The term IFRSs refers to the new numbered series of pronouncements that the IASB is issuing, as distinct from the International Accounting Standards (IASs) issued by its predecessor. More broadly, IFRSs refer to the entire body of IASB pronouncements, including: Standards (IFRSs) and interpretations (IFRICs) approved by the IASB and its International Financial Reporting Interpretations Committee (IFRIC); and Standards (IASs) and interpretations (SICs) approved by the predecessor IASC and its Standard Interpretations Committee (SIC). The IASB and IFRIC have issued, respectively, 8 IFRSs and 16 IFRICs. The IASC and SIC issued 41 IASs and 33 SICs (20 superseded).

¹¹ IRS Publication 583 Starting a Business and Keeping Records (Revised January 2007)

Two IFRSs relate to GPP&E: IAS 16, "Property, Plant and Equipment," as amended May 22, 2008, and IAS 36, "Impairment of Assets, as amended May 22, 2008.

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Basis for Conclusion

Currently there are divergent practices in how long and the types of records federal agencies retain that support assertions related to GPP&E. The committee proposal would standardize record retention guidance and practices for federal agencies to follow.

Federal agencies, working together with NARA, establish retention periods for different schedules of records to serve various needs, such as maintaining relevant documentation for a sufficient period of time to protect the government's rights with respect to certain transactions or events, to support effective internal controls over a period of time, and to support assertions made, explicitly and implicitly, in annual financial statements.¹² The committee focused on the latter need. That is, management of federal reporting entities make "assertions regarding the recognition, measurement, presentation, and disclosure of information in the financial statements and related disclosures."¹³ The five explicit or implicit financial statement assertions recognized by the AICPA and GAO include: (1) the existence or occurrence of assets or liabilities of the entity at a given date or recording of transactions over a given period of time; (2) the completeness of transactions and accounts; (3) the rights to assets and obligations incident to liabilities are properly represented; (4) the valuation and allocation of asset, liability, equity, revenue, and expense components are appropriately included; and (5) the financial statements present and disclose particular components properly.¹⁴ In the context of GPP&E, these assertions relate to specific qualitative and quantitative characteristics of a specific category of asset, such as the actual or potential uses of the asset, its useful life, and its acquisition cost.¹⁵ Further, management of federal reporting entities should exercise sound judgment when deciding what evidence (in addition to an entity's accounting records) is sufficient to support the assets reported in their financial statements. Accordingly, management of federal reporting entities must identify the types of GPP&E records to maintain and their retention periods to meet management's various needs.

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¹³ FAM § 235.02; see AU § 326.14.

¹⁴ See AU § 326A.03-.08.

¹⁵ SFFAS No. 6, ¶¶ 22-45; see SFFAC No. 5, ¶¶ 18-25.

The committee proposes the retention of Federal reporting entities' GPP&E records consistent with the following principles:

- Records supporting the existence of a GPP&E asset; records supporting the federal reporting entity's rights, such as ownership; records supporting the completeness of a call of GPP&E; records supporting the overall valuation of GPP&E, depreciation, and book value (whether actual or estimated historical cost); records supporting financial statement classification, description, and disclosure, such as the use(s) and useful life of the GPP&E should be retained until:
 - 10 years after the disposal of the asset for real property;
 - The later of 6 years 3 months after final payment or disposal of the asset for non-real property;
 - examples of these types of documents include: deed/title, appraisals, architectural designs and plans, occupancy permits, condemnation, filings, official correspondence with governments, and total cost spreadsheets,
 - Other examples include GPP&E records of a transactional nature, such as contracts, invoices, and payment documents. Such routine procurement files normally are subject to section 3 of this GRS or other GRS, as applicable, but the agency may determine that it is necessary to also retain any such record (high dollar, large scope) under that section to serve one or more of the purposes stated above.

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¹⁶ U.S. Code Title 44, Chapter 33 and NARA [Introduction to General Records Schedules](#)

until NARA has approved them. Once approved by NARA, retention periods in the schedules are mandatory and authorize the systematic removal of unneeded records from federal offices.

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Suggestion to the Board

The committee proposes that its recommendations on record retention timeframes be implemented through an official request from the Financial Accounting Standards Advisory Board (FASAB) to the National Archives and Records Administration (NARA). The FASAB's request would include clarifying and modifying current NARA's record retention periods set out in NARA's GRS 3 to address agency's old permanent and transactional GPP&E records.

Currently NARA's GRS 3 provides record retention guidance for real property files and routine procurement files. The committee proposes that the following GRS 3 section of the real property files be modified:

"Title papers documenting the acquisition of real property (by purchase, condemnation, donation, exchange, or otherwise), excluding records relating to property acquired prior to January 1, 1921. (a) Records relating to property acquired after December 31, 1920, other abstract or certificate of title. Dispose 10 years after unconditional sale or release by the Government of conditions, restrictions, mortgages or other liens. (b)..."

For routine procurement files section of the GRS 3, the committee proposes the following section to be modified:

"Contract, requisition, purchase order, lease, and bond and survey records, including correspondence and related papers pertaining to award, administration, receipt, inspection and payment...(a) Transactions that exceed the simplified acquisition threshold and all construction contracts exceeding \$2,000. Destroy 6 years and 3 months after final payment. (b) Transactions at or below the simplified acquisition threshold and all construction contracts at or below \$2,000. Destroy 3 years after final payment."

Committee's Proposed Changes to GRS 3

The committee proposes that the GRS 3 section of the real property files be retitled as *general PP&E files* and the real property section modified as follows: *Real property records that support existence, ownership, overall valuation and classification (e.g., such as deed/title, appraisals, architectural designs and plans, occupancy permits, condemnation, filings, official correspondence with governments, and total cost spreadsheets or downloads)*, excluding records

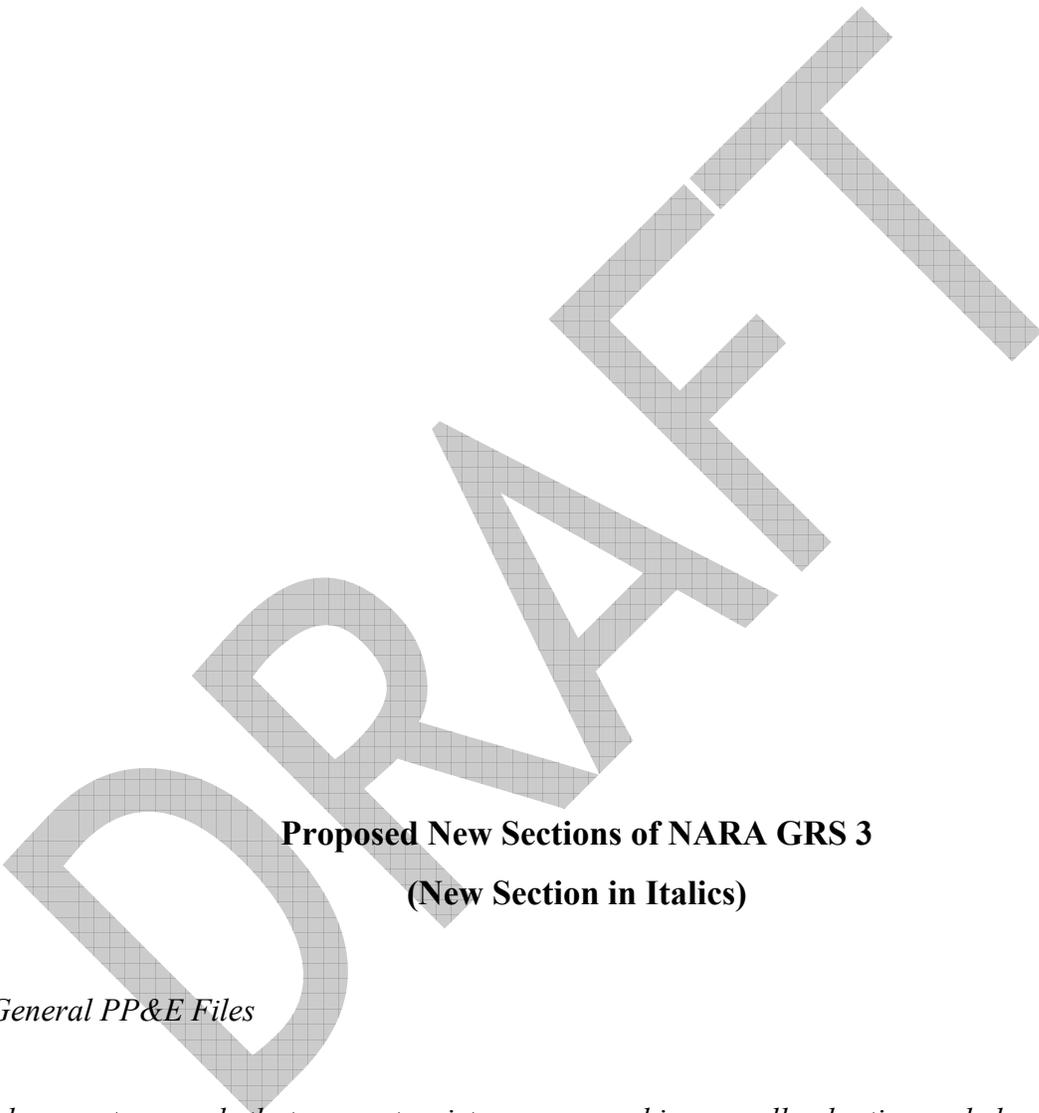
relating to property acquired prior to January 1, 1921. (a) Records relating to property acquired after December 31, 1920, other abstract or certificate of title. Dispose 10 years after unconditional sale or release by the Government of conditions, restrictions, mortgages or other liens. (b)..." A new sections would be added for non-real property as follows: *Non- real property records that support existence, ownership, overall valuation and classification (e.g., such as deed/title, appraisals, architectural designs and plans, occupancy permits, condemnation, filings, official correspondence with governments, and total cost spreadsheets or downloads), excluding records relating to property acquired prior to January 1, 1921. (a) Records relating to property acquired after December 31, 1920, other abstract or certificate of title. Dispose on the later of 6 years 3 months after final payment or when asset is removed from an agencies books for disposal. (b). Abstract or certificate of title Transfer to purchaser after unconditional sale or release by the Government conditions, restrictions, mortgages, or other liens*

A new section would be added a the end of the section to address transactional records as follows: *Other examples include GPP&E records of a transactional nature, such as contracts, invoices, and payment documents. Such routine procurement files normally are subject to section 3 of this GRS or other GRS, as applicable, but the agency may determine that it is necessary to also retain any such record (high dollar, large scope) under that section to serve one or more of the purposes stated above.*

For the routine procurement files section of the GRS 3, the committee proposes no changes as the new reference above is intended to clarify its applicability to GPP&E records "Contract, requisition, purchase order, lease, and bond and survey records, including correspondence and related papers pertaining to award, administration, receipt, inspection and payment...(a) Transactions that exceed the simplified acquisition threshold and all construction contracts exceeding \$2,000. Destroy 6 years and 3 months after final payment. (b) Transactions at or below the simplified acquisition threshold and all construction contracts at or below \$2,000. Destroy 3 years after final payment."

Appendix: List of Abbreviations

AAPC	Accounting and Auditing Policy Committee
AICPA	American Institute of Certified Public Accountants
C.F.R.	Code of Federal Regulation
DoD	Department of Defense
DON	Department of Navy
FAR	Federal Acquisition Regulation
FASAB	Federal Accounting Standards Advisory Board
FASB	Financial Accounting Standards Board
GAO	Government Accountability Office
GPP&E	General Property, Plant, and Equipment
GRS	General Records Schedule
GSA	General Services Administration
IAS	International Accounting Standard
IASB	International Accounting Standards Board
IFRS	International Financial Reporting Standards
IRS	Internal Revenue Service
MOA	Memorandum of Agreement
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
PP&E	Property, Plant, and Equipment
SEC	Securities and Exchange Commission
SECNAV	Secretary of Navy
SFFAS	Statement of Federal Financial Accounting Standards
USACE	U.S. Army Corps of Engineers
U.S.C.	United States Code
USMC	U.S. Marine Corps



**Proposed New Sections of NARA GRS 3
(New Section in Italics)**

1. General PP&E Files

Real property records that support existence, ownership, overall valuation and classification (e.g., such as deed/title, appraisals, architectural designs and plans, occupancy permits, condemnation, filings, official correspondence with governments, and total cost spreadsheets or downloads), excluding records relating to property acquired prior to January 1, 1921.

(a) Records relating to property acquired after December 31, 1920, other abstract or certificate of title.

Dispose 10 years after unconditional sale or release by the Government of conditions, restrictions, mortgages or other liens.

(b) Abstract or certificate of title

Transfer to purchaser after unconditional sale or release by the Government conditions, restrictions, mortgages, or other liens

Non- real property records that support existence, ownership, overall valuation and classification (e.g., such as deed/title, appraisals, architectural designs and plans, occupancy permits, condemnation, filings, official correspondence with governments, and total cost spreadsheets or downloads), excluding records relating to property acquired prior to January 1, 1921.

(a) Records relating to property acquired after December 31, 1920, other abstract or certificate of title.

Dispose on the later of 6 years 3 months after final payment or when asset is removed from an agencies books for disposal.

(b). Abstract or certificate of title

Transfer to purchaser after unconditional sale or release by the Government conditions, restrictions, mortgages, or other liens

GPP&E records of a transactional nature, such as contracts, invoices, and payment documents are normally considered routine procurement files subject to section 3 of this GRS or other GRS, as applicable, but the agency may determine that it is necessary to also retain any such record (high dollar, large scope) under that section to serve one or more of the purposes stated above.

3. Routine Procurement Files

Contract, requisition, purchase order, lease, and bond and survey records, including correspondence and related papers pertaining to award, administration, receipt, inspection and payment

(1) Transactions dated on or after July 3,1995 (the effective date of the FAR rule defining simplified acquisitions threshold)...

(a) Transactions that exceed the simplified acquisition threshold and all construction contracts exceeding \$2,000.

Destroy 6 years and 3 months after final payment.

(b) Transactions at or below the simplified acquisition threshold and all construction contracts at or below \$2,000.

Destroy 3 years after final payment.

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