

Frequently Asked Questions (FAQs) about GRS 2.8, Employee Ethics Records

INTRODUCTION

1. What is the purpose of GRS 2.8?

This schedule provides disposition authority for records executive branch agencies create and receive in the course of carrying out their ethics program responsibilities.

2. Whom do I contact for further information about this schedule?

You may contact NARA's General Records Schedules Team at GRS_Team@nara.gov with questions about this schedule.

GENERAL QUESTION

3. Does this schedule cover records maintained by the Office of Government Ethics relating to its oversight of the government-wide ethics program?

No, this schedule applies only to the records of agencies relating to their own ethics program.

CHANGES FROM THE OLD GRS

4. How does GRS 2.8 differ from the old GRS?

The new schedule combines ethics program procedures files (GRS 25, item 9) and ethics program implementation, interpretation, counseling, and development files (GRS 25, items 1a and 1b) into general ethics program records (item 010).

The GRS no longer covers public financial disclosure reports -- OGE Form 278 and 278e -- for Presidential and Vice Presidential candidates because only two agencies need that disposition authority; it is more appropriately covered by agency-specific disposition schedules.

This schedule includes three new items: Periodic transaction reports (item 062), Requests to inspect or receive copies of executive branch personnel public financial disclosure reports or other covered records (item 063), and financial disclosure supporting documentation (item 090).

Ethics program employee training and education files (GRS 25, items 8a and 8b) will be part of the Employee Training Records GRS when we publish it; until then, the existing authorities remain unchanged and valid for use.

QUESTION RELATED TO ITEM 010

5. Does this item cover guidance on ethics issues, such as guidance to our senior employees from agency ethics officials on whether certain categories of gifts are acceptable, or would we need to write an agency-specific disposition schedule?

Yes, this item covers guidance to senior employees on ethical issues.

QUESTION RELATED TO ITEMS 060 to 081

6. Items 060 to 081 are the forms and reports related to financial disclosure reports. Why aren't these aggregated into one item?

We cannot aggregate financial disclosure reports covered by items 060, 061, 062, 063, 070, 071, 072, 080, and 081 into one item because each form has different statutory recordkeeping requirements (unique implied cutoffs). NARA and the Office of Government Ethics have no authority to alter the statutory requirements.

QUESTIONS RELATED TO ITEM 062

7. Why must an agency retain a periodic transaction report for seven years?

Under the Ethics in Government Act, agencies must allow public access to an OGE Form 278/278e for six years from the date the agency received it. Therefore, agencies must retain OGE Form 278-T reports for seven years to ensure that all information supporting the OGE Form 278/278e is available to the public for review during the entire six years prior to destruction/deletion.