SMG 3291.11

FDA Staff Manual Guides, Volume III – General Administration

Information Resources Management - Records Management

Transfer of Temporary and Permanent Physical Records to Off-site Storage Facilities

Effective Date: 10/22/2026

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1. Purpose

The purpose of this policy is to provide FDA personnel with the requirements, responsibilities and procedures for the timely and systematic transfer of FDA temporary and permanent physical records to off-site storage facilities. While FDA has actively adopted electronic business processes to comply with National Archives and Records Administration (NARA) mandates to transition to electronic recordkeeping, the reality is that FDA continues to maintain a large volume of physical records. Transfer of these records to NARA-approved off-site facilities frees up valuable active office workspace and affords more economical storage, while the records remain in FDA's legal custody until the records are eligible for disposition/disposal. The term "FDA personnel" in this SMG includes civilian government employees, contractors, political appointees, Commissioned Corps personnel, and other authorized FDA stakeholders.

2. Background

The Office of Management and Budget (OMB)/NARA Memorandum M-23-07, Update to Transition to Electronic Records, established a deadline of June 30, 2024, after which NARA would no longer accept new transfers of permanent and temporary physical (analog) records. In addition, by June 30, 2024, all agencies were required to manage all permanent and temporary records in electronic format or store them in commercial storage facilities that meet NARA facility standards. This

mandate does not apply to physical records that were transferred for storage into Federal Records Centers (FRCs) before June 30, 2024. Those records will remain at the FRCs until eligible for destruction or permanently accessioned into the National Archives.

3. Authorities and References

- 36 CFR 1232: Transfer of Records to Records Storage Facilities.
- 36 CFR 1234: Facility Standards for Records Storage Facilities.
- 36 CFR 1230: Unlawful or Accidental Removal, Defacing, Alteration, or Destruction of Records
- 36 CFR 1231: Transfer of Records from the Custody of One Executive Agency to Another.
- 5 CFR 293: Personnel Records
- OMB M-23-07 Memorandum: Update to Transition to Electronic Records, June 28, 2019.
- NARA Commercial Records Storage Facilities by State.
- NARA: Records Storage Standards Toolkit
- NARA: The FRC Toolkit – Your Guide to the Federal Records Center Services.
- NARA: Records Management Language for Contracts
- FDA Records Control Schedules (RCS)
- NARA Bulletin 2020-01, Guidance on OMB/NARA Memorandum Transition to Electronic Records (M-19-21)
- NARA: Archives and Records Centers Information System (ARCIS)
- FDA Records Management Master Glossary.
- OPM – Guide to Personnel Recordkeeping
- Civilian Personnel Records, Services for Federal Agencies

4. Scope

This SMG applies to the transfer of FDA temporary physical records (paper; maps, still pictures, audiovisual tapes, cassettes and/or disks; film and microfilm; etc.) to NARA-approved Commercial Records Storage Facilities. It also covers the transfer of permanent physical records for interim storage until they can be converted to electronic format as required for transfer to the National Archives. It does not cover transfers of electronic records, including FDA permanent electronic records that

require accessioning into the National Archives nor temporary electronic records which are normally preserved in FDA electronic recordkeeping systems and/or applications until they are eligible to be deleted or are no longer needed for business per applicable Records Control Schedules (RCS).

5. Policy

FDA's Records Management Policy SMG 3291.1, requires that Centers/Offices/Programs (COPs) transfer paper and other analog temporary records that are no longer sufficiently active to warrant retention in FDA office space, in accordance with an approved RCS, as soon as possible to an approved off-site records storage facility, where they will be stored until eligible for disposal. While permanent records are required by NARA to be managed in electronic format, FDA may also transfer physical permanent records off-site for interim storage, in accordance with this SMG, until they can be digitized.

The transfer of physical records to off-site records storage facilities must be carried out according to the following requirements:

- FDA COPs should coordinate with their respective records custodians/coordinators, records managers, and Assistant Records Liaison Officer (ARLO) to identify and locate inactive FDA temporary physical records maintained in current office workspace and consider transferring the records to off-site records storage facilities.

- The FDA has contracted with a NARA-approved commercial records storage facility, approved by the Office of Acquisitions and Grants Services (OC-OO-OFBA-OAGS), that Centers/Offices must use for their off-site records storage needs.

- The COP ARLO is responsible for approving transfers of physical records to FDA-approved commercial storage facilities and overseeing records transfers in accordance with the requirements in 36 CFR 1232 and the respective contractual agreement.

- Adequate documentation must be maintained by the ARLO or designee, to identify and locate COP records in commercial storage facilities for efficient and timely responses to internal and/or external requests for information. Storage inventories may be maintained through a commercial vendor's customer portal or an internal tool maintained by the COP. Inventories of FDA records maintained at NARA FRCs are maintained in NARA's ARCIS system. The ARLO will need to provide copies of records inventories and periodic reports on respective records holdings to the FDA Records Officer (RO) or Records Management Branch in the Office of Management and Enterprise Services (OMES) Division of Information Governance (OMES/ODIGA/DIG/RMB), as requested.

- FDA must certify to NARA that a commercial storage facility meets the 36 CFR 1234 standards and secure NARA approval for its use before storing respective records. If FDA has placed records in a records storage facility and has not secured NARA approval, it must go through the approval process. For details concerning facility certification and required documentation, see Records Stored in a Commercial Storage Facility and 36 CFR 1234.30(e).

- Transfers to commercial storage facilities must be conducted as directed by the ARLO and in accordance with requirements in NARA regulations and the respective contractual agreement.

- For detailed guidance regarding preparation and transfers of records to contracted commercial storage facilities as well as reference requests/retrievals, consult the applicable vendor's procedures.

6. Roles and Responsibilities

A. FDA Records Officer (FDA RO) or Designee (Records Management Branch (RMB) Lead (OC-OO-OMES-ODIGA-DIG-RMB))

- Collaborates with ARLOs and follows NARA guidance, to certify that commercial records storage facilities meet NARA standards prior to using these facilities to store FDA records (see 36 CFR 1234.30 (e)).
- Reviews and approves all contractual agreements with commercial records storage facilities to ensure they meet NARA standards prior to transferring FDA records. For recommended contract language, see NARA Records Management Language for Contracts.
- Works with the Office of Acquisitions and Grants Services (OC-OO-OFBA-OAGS) to execute and administer records storage contracts.
- Authorizes ARLOs to approve records transfers to commercial records storage facilities that meet NARA standards and are conducted in accordance with requirements in 36 CFR 1232 and the respective contractual agreement.
- Develops and implements agencywide records transfer procedures, guidance and training that are consistent with established records management regulations and best practices.
- Serves as the Records Disposition Program Liaison between the FDA and NARA and OMB for all matters pertaining to management and disposition of FDA records stored in FRCs prior to the transfer cutoff of June 30, 2024.
- Notifies NARA promptly of any actual, impending, or threatened unlawful removal, defacing, alteration, corruption, deletion, erasure, or other

destruction of records that may occur during transfer activities (see 36 CFR 1230).

B. Center/Office/Program Director or Designee

- Designates in writing an ARLO who is responsible for management of the overall COP records management program.
- Ensures the ARLO has adequate skills, training, resources, time, and appropriate authority to carry out respective duties.
- Ensures proper funding and support is provided for records management storage activities.

C. Center/Office/Program Assistant Records Liaison Officer (ARLO)

- Approves transfers of temporary physical records to commercial storage facilities that meet NARA standards and ensures that all applicable transfer requirements to such facilities are met. Coordinates with record custodians/coordinators and maintains complete inventories of temporary physical records transferred to off-site storage facilities. Provides copies of inventories and periodic reports to the FDA RO or RMB, as requested.
- Works with program offices to ensure that they do not co-mingle personal papers non-records with Federal records and ensures that temporary physical records stored in off-site storage facilities are destroyed in accordance with the disposition instructions found in the FDA Records Control Schedules (RCS).
- Coordinates with records custodians/coordinators to transfer physical records that are no longer needed for day-to-day operations to records storage facilities, based on analysis of current or projected volume, rate of accumulation, and reference needs.
- Provides assistance and timely guidance to Center program offices in the preparation and transfer of temporary physical records no longer needed for day-to-day operations.
- Notifies the FDA RO or designee, immediately, of any incidents involving the loss, damage and/or destruction of FDA records during transfer, storage and retrieval activities.

D. Records Custodians and Coordinators

- Obtain approval from the COP ARLO to transfer FDA physical records to off-site records storage facilities when they are no longer needed for day-to-day operations.
- Confer with the ARLO for guidance with the transfer process, including organizing, packing, shipping and documenting approved records transfers. Create and maintain transfer documentation (e.g., approved TR and box contents listings, etc.) for records stored off-site for use when requesting records from the storage facilities.
- Ensure that temporary records stored off-site are managed properly and destroyed, when eligible, in accordance with the disposition instructions in the FDA RCS.
- Notify ARLO of any incident involving the loss, damage and/or destruction of FDA records during transfer, storage and retrieval activities.

E. All FDA Employees and Other Authorized Personnel

- Contact your COP ARLO or local records manager when requesting submission or retrieval of temporary records boxes/files to or from NARA FRCs and/or commercial records storage facilities.
- Assist in preparing records for transfer to NARA-approved commercial records storage facilities, as necessary.
- Inform the COP ARLO of any loss, damage or inadvertent destruction of the respective records during transfer, storage and retrieval activities.

7. Procedures

A. General Transfer Guidance:

- Effective July 1, 2024, physical records considered for off-site storage must be sent to FDA-approved commercial records storage facilities that meet 36 CFR 1234 standards.
- NARA guidance on transfers to off-site commercial storage facilities, is provided in the Federal Records Storage Standards Toolkit, File 3.

B. Transfers to Commercial Records Storage Facilities

- FDA contracts with commercial records storage vendors must incorporate NARA facility standards and allow for inspections by FDA and NARA to ensure compliance (36 CFR 1232.18). For recommended contract language, see NARA's Records Management Language for Contracts.

- Transfers of physical records to commercial storage facilities must be conducted in accordance with the requirements in 36 CFR 1232 and the respective contractual agreement.
- For transfers of permanent and unscheduled records to commercial storage facilities, documentation must be provided to NARA, and whenever these records are moved to a new facility, FDA must notify NARA of the facility's new location by sending an email to rm.communications@nara.gov,mailto:rm.communications@nara.gov per 36 CFR 1232.16(b).
- Prior to transferring special media (e.g., audiovisual tapes) or mixed media (paper and special media) records to commercial storage facilities, ARLOs must coordinate with the storage facility to ensure that proper environmental conditions exist to safely preserve the non-paper media (36 CFR 1234.14). Additional guidance for microform records is covered in 36 CFR 1238.
- For additional NARA guidance regarding documentation and use of commercial storage facilities, see Records Stored in a Commercial Records Storage Facility.

C. Records Transfers from One Executive Agency to Another

In accordance with 36 CFR 1231, FDA must obtain NARA's written approval before transferring records to another executive agency. NARA's approval is unnecessary when the transfer is required by statute, Executive Order, Presidential reorganization plan, or treaty or when the records are transferred to records centers or the National Archives. It is also unnecessary when the records are lent for official use or when the transfer is between two parts of the same Executive department.

D. Transfers of Official Personnel Folders (OPFs) and Employee Medical Files (EMFs)

Guidance on the management of Official Personnel Folders (OPFs) and Employee Medical Files (EMFs) is provided in 5 CFR 293. OPFs are covered in Subpart C and EMFs are covered in Subpart E. For disposition of these important records, refer to instructions in the respective subpart and additionally, in the OPM – Guide to Personnel Recordkeeping, Chapter 7, Transferring Records.

The National Personnel Records Center (NPRC) in St. Louis, MO has special procedures for requesting civilian personnel/medical records (see Civilian Personnel Records, Services for Federal Agencies).

E. FDA Records Stored at FRCs

NARA will continue to store analog FDA records that were transferred to FRCs prior to June 30, 2024, until temporary records are eligible for destruction, or until permanent records are eligible to be transferred to the National Archives. The NARA Annual Move process transfers legal and physical custody of permanent FDA records to NARA via a Transfer Request (TR) in the Electronic Records Archives (ERA).

FDA staff can continue to submit reference requests for temporary withdrawal of agency records from the FRCs via ARCIS, and NARA will accept returned records back into the FRC. However, if the requested records are permanently withdrawn, they cannot be returned to the FRC. For more information on records retrieval requests and the Annual Move of Permanent Records, consult the latest procedures on the NARA website.

8. Definitions

For full definitions of records management terminology used in this SMG, see the FDA Records Management Master Glossary.

9. Effective Date

The effective date of this guide is October 22, 2026.

10. Document History – SMG 3291.11, "Transfer of Temporary and Permanent Physical Records to Off-site Storage Facilities"

Status (I, R, C)	Date Approved	Location of Change History	Contact	Approving Official
Initial	10/21/2026	N/A	FDA Division of Records (OO/ODIG/ORE/DR)	Stanley Fairfax, Acting Director, ODIG

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