

# *How to Meet the NARA 2019-2022 Deadlines*

## *Top Challenges & Key Technology Solutions*

*By Deja Logan*

## Executive Summary

In 2012, the Executive Office of the President of USA, Barack Obama issued a memorandum that defined the end of the road for paper-based workflows. The NARA 2019/2022 Deadline, as it's known in the industry, expects government agencies to fully convert to digital formats.

The 2022 deadline is closing in fast; government agencies are scrambling to get on board on time and meet the NARA 2019/2022 requirements. The hardest push seems to be digitizing permanent records and finding an acceptable way to manage this data digitally.

To assist our clients, Armedia presents a three-part process on how government agencies can meet the NARA 2019/2022 deadlines.



Image 1: President Barack Obama is photographed during a presidential portrait sitting for an official photo in the Oval Office, Dec. 6, 2012. (Official White House Photo by Pete Souza, Source: Wikipedia)

### Part 1:

- What are the 2019 & 2022 mandates and how can you become compliant in a way that helps you simultaneously organize things electronically
- What to do to get ready to meet the deadline
- Why you need an ECM, and how Alfresco can help
- How to evaluate your content before configuring an ECM

### Part 2:

- How to make a plan for scanned content to comply with the 2019 and 2022 mandates
- Further evaluation of your content to ensure correct configuration
- Why it is important to map out what you have and how to link it to your retention schedule
- Examples of configuration and implementation of electronic solutions for your 2019 and 2022 ingested content
- Setting up and configuring a content library
- Seamless mapping to your retention schedule
- How using an ingestion tool like Ephesoft can speed up your progress

### Part 3:

- Implementing a lifecycle for day forward content

# Part 1: Basic NARA 2019-2022 Info

## WHAT ARE THE 2019 AND 2022 MANDATES?

As you may know, a memorandum from the Executive Office of the President, M-12-18, August 24, 2012, Subject: Managing Government Records, included the following:

“By 2019, Federal agencies will manage all permanent electronic records in an electronic format.

By December 31, 2019, all permanent electronic records in Federal agencies will be managed electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format.

By December 31, 2013, each agency will develop and begin to implement plans to achieve this transition. Agencies should also consider the benefits of digitizing permanent records created in hard-copy format or other analog formats (e.g., microfiche, microfilm, analog video, analog audio).”

In addition to the President’s memorandum, the National Archives and Records Administration FY 2018 – FY 2022 Strategic Plan covers the 2019 and 2022 mandates and planning for all agencies and NARA to become more efficient by going paperless. By 2022, all temporary records in your agency will need to be in electronic form for transfer to NARA.

This strategic plan states:

“By December 31, 2022, NARA will, to the fullest extent possible, no longer accept transfers of permanent or temporary records in analog formats and will accept records only in electronic format and with appropriate metadata.”

Basically, the remainder of your content that needs to be in electronic form, and the deadline is coming up fast.

If you are in line for full compliance of the 2019 mandate, then you may already understand the amount of work that can go into complying with these mandates. Since, typically, there are fewer permanent records than temporary records, the next mandate may be a bigger endeavor. Getting ready for the next deadline as soon as possible will pay off.

The good news is that Armedia can assist in this effort.

# Getting Ready to Meet the NARA 2019/2022 Recommendations

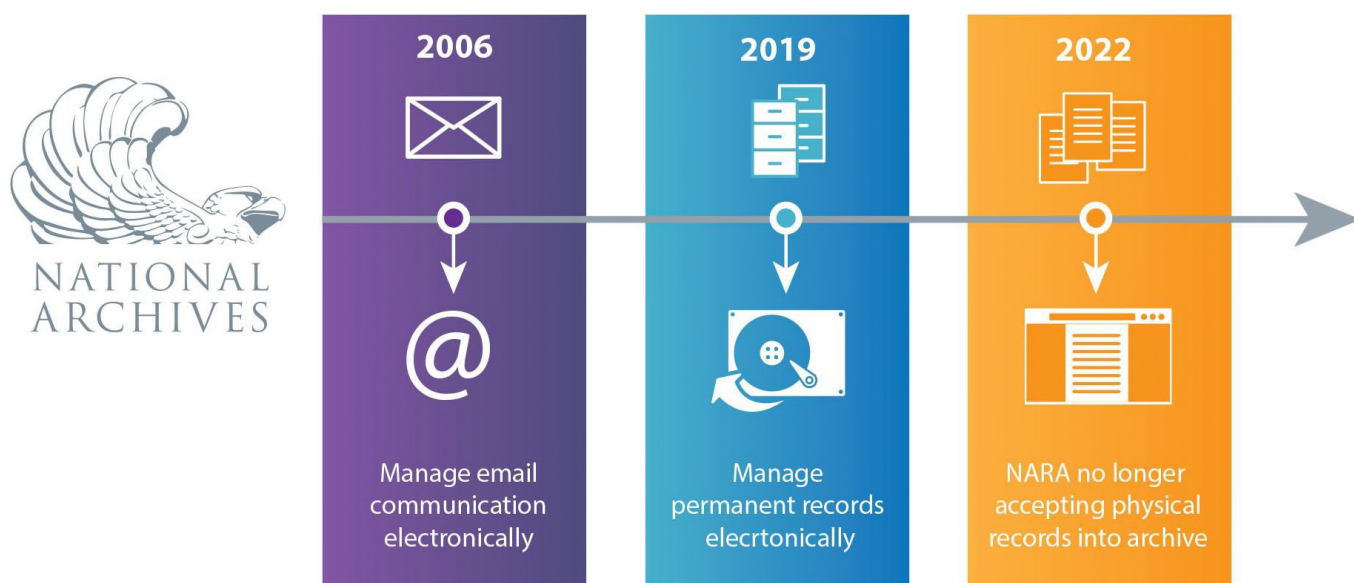


Image 2: The NARA 2019-2022 Timeline

The first step is evaluating what you have. Most of you may already know what you have that needs to be scanned into electronic form. If you do, that is a good start! If you do not, then take a look at your current scene.

Ask yourself: What records need to be made available in electronic form for compliance to the 2019 and 2022 mandates?

Here are some questions to help you map out the workload you're facing:

- Where are these records currently?
- How many are there?
- What state are they in?
- Do they need to be cleaned up? Is there any order or structure to them? Do they have clear categories or labels?
- Is there any kind of inventory of them somewhere (e.g., paper or electronic inventory)?
- How much time and money would it take to scan them all?
- What resources do you need in order to do this (e.g., employees, printers, etc.)? Do you have the resources already or do you need to outsource the job?
- Do you have enough time to reach the mandates (starting with permanent records for the 2019 mandate if you have not done that already)?

This is by no means an exhaustive list. But it's a good start. It's not a detailed game plan. It's more of a 30,000-foot snapshot of all the ground you will need to cover as part of meeting the NARA 2019/2022 requirements.

## Why Should You Consider an Enterprise Content Management System like Alfresco?

The Alfresco Governance Platform is a fully DOD 5015.2 certified ECM. All of the tools you need for Records Management controls are there waiting for you.

However, just dumping content into an Enterprise Content Management system may not be very helpful. End-users will need reliable categorization of this content, so they can do meaningful, routine actions. This is why it is important to have a plan of action that will not upset the current business process flows of the users in the agency during this whole transition.

Alfresco Content Services and Alfresco Governance Services can give you full support in content management as well as all of the records management tools you will need:

- Data capture
- Metadata editing
- Security markings
- Customized workflows
- Data retention
- Legal holds
- Destruction and transfer, etc.

Alfresco has it all.

You can spend less time worrying about having the tools you need and more time configuring the system to meet all your unique requirements in addition to industry standards and NARA guidelines.

## Questions to Consider Before Configuring Your ECM

Now let's look at some questions you'll want to consider before you start to configure your ECM.

It is best to have a plan of action before you start scanning. Ask questions like:

- How do you make sure the incoming content gets its proper retention applied?
- How can you be sure that content is getting the lifecycle it needs in the system?
- How can you be sure that only users who are on a 'need to know' basis can access these newly scanned in records without having to bottleneck everything through to the Records Manager or RM staff?

All of these can be answered easily using Alfresco – Enterprise Content Management System (ECMS) plus Alfresco Governance Services.

If the paper records that must be scanned have already completed their lifecycles, the solutions and answers to these questions can be fairly straightforward. However, you may still need a plan and a strategy before you just start ingesting everything.

You will need to know the components of what you need and the components of what your ECM can DO out of the box and what you may need to customize.

If you use Alfresco, the answers could be something like:

- Q: How do you make sure the incoming content gets its proper retention applied?
- A: I can add proper metadata to match them to a File Plan Schedule OR I can add the content to a folder that is already mapped to a File Plan Schedule.
- Q: How can you be sure that content is getting the lifecycle it needs in the system?
- A: I can create a fully automated lifecycle using Alfresco Processing Services OR a part manual and part automated lifecycle using out of the box rules and tools once I have my lifecycles defined.
- Q: How can you be sure that only users who are on a 'need to know' basis can access these newly scanned in records without having to funnel everything through the Records Manager or RM staff?
- A: I can set up libraries for each Division/Department or area that can control permissions of users on a 'site level' and then further inside the Library at the folder level with a role type (Consumer, Contributor, Collaborator or Manager).

Alfresco has a lot to offer, and therefore for this purpose, we recommend it as our ECM choice.

## Further Evaluation on What You Have and What You Need

Think about the content you are about to scan in. What do you have that needs to be scanned in to meet the 2019 and 2022 mandates? What information do you need to know in order to set up things in your ECM before you scan it all in?

Run through these questions for the records:

- Where does this content belong on the retention schedule?
- What group, department, division, etc., did this content derive from?
- Do the users from that division/area still need access to this content? How frequently?
- For what purpose do they access this content? What do they still need for it? What will they need to do with it (e.g., read, download, add to a process, etc.)?
- Is this content involved in any type of legal action or audit? Will it be needed for any audit or other similar purposes in the near future?
- What are the criteria for users in order to find this content? What would the search filters be?
- What metadata will need to be associated with this content? Ask yourself:
  - How can you classify it or connect it to a retention schedule?
  - What is the document "date" (the year it was put into use)? for FY retention purposes?
  - Are there any other dates that could be important to capture based on the content type? For instance, an "event date" or an "action date"? For example: If it was an Employee file, the "date it was put into use" may not be needed, but the "Employee Separation Date" might be more useful, since your retention 'count down' may not start until the employee has separated the agency – i.e. retain 6 years after the employee leaves the company etc.

- o What metadata is needed to find it in the system using the search criteria: subject, project, program, ID numbers, etc.? Note: in order to have a search filter for it, the metadata may need to be associated to each document scanned in.
- o What metadata is needed to transfer the records to NARA? Per NARA's guidelines, they want: "filename, record ID, title of the record [its name], a description, agent responsible for the record, creator, creation date and rights [all out of the box with Alfresco]." And If applicable: "coverage and Relation" – see guidelines at: <https://www.archives.gov/records-mgmt/bulletins/2015/2015-04.html>
- o Do you want to add a "Transfer Confirmation Number" to the content after it has been transferred or will you delete the content after it has been successfully transferred?
- o Do you have any type of security markings or supplemental markings for this content (Top Secret, Confidential, U.S. Only, FOUO)?

In Alfresco you can use tools to add the metadata you need, whether automatically or manually.

Alfresco already captures a wealth of metadata 'out of the box,' little to no configuration needed. Some metadata is available out of the box, you just need to let the system know when and where it needs to be applied. But above all, every agency is different and quite commonly every document type may need its own unique set of metadata for retrieval, compliance, and retention purposes.

## Part 1 Wrap-Up

Meeting the NARA 2019/2022 Deadlines means a lot of hard work and a lot of planning.

It's not something that agencies can just rush through.

There are no cookie-cutter, copy-paste strategies.

This is why companies like Armedia exist.

## Part 2: The Strategy

In the previous part we raised the issues of the importance and complexity of meeting the NARA 2019/2022 deadlines. It's not something you can rush through and companies will need to have a plan before they jump into action.

Now, in this section, I would like to go over the following:

- Making a plan for scanned content to comply with the 2019 and 2022 mandates.
- Further evaluation of your content to help you correctly configure things.
- Why it is important to map out what you have and how to link it to your retention schedule.
- Examples on configuration and implementation of electronic solutions for your 2019 and 2022 ingested content.
- Setting up and configuring a content Library.
- Seamless mapping to your retention schedule.
- How using an ingestion tool like Ephesoft can speed up your progress.

Once you've finished evaluating your content, the next stage is making a plan for the scanned-in content.

### Making a Plan for Your Scanned-in Content

Let's start with a basic plan. In order to make that plan ask yourself:

1. How will this content be ingested, scanned in? Will we have a tool like Ephesoft to help with data extraction?
2. What do we have to scan in, what are its document types/categories?
3. Where will it go in the system? What libraries do I need to set up for this content?
4. What folder structure needs to be in each library so that I can scan the documents into the proper folder? This may be crucial – you may not want to dump everything into the "HR" library. Perhaps you would rather scan all the "Application Records," ensuring they go into the "Applications" folder in the HR Library – that way it is much easier to map them to the Records Retention Schedule and File Plan.
5. What is the crucial metadata for each type of document, or category of documents, being scanned in? Can we add high level 'bulk' metadata to everything that goes into a certain library? Does metadata need to be manually added to folders/records, individually, after they are ingested into the target library and folders? What are they? What folders/libraries do they all apply to? Some metadata may need to be added to every library and some may only apply to a folder in a library. Sort out your data model and what metadata is needed at what level and on what objects (document, folder, library)?
6. Will all of this content be an official record as soon as it hits the library? Or will some of it still be in some kind of draft mode? If everything is already an official record, and no more edits are needed, then it is better to ingest everything after your plans and rules are set up in the system. If you have everything mapped out, then all you need to do is add the content to the right folders in the library

and the system adds the needed metadata and links it to the proper category in the File Plan Retention Schedule because you set it up first before adding the content.

7. Who will have access to each of these libraries? What type of access should they have? (Read, Write, Manage, etc.). Set up the permissions on the library and the subfolders ahead of time.

As you can see, there are plenty of little details to consider before you get to actually do any work, however, this is a crucial phase. Spending some time to think through these details can help you save time in the long run.

## Setting up a Library Structure

In Alfresco and most other ECMs, you can set up a library for your content. Within that library, you can section-off your content into sub-categories or groups. For example, you can have a library site just for HR records and folders for the different areas of HR (Applications, Employee Records, I-9 forms, etc.). You can scan in your content into the proper folders within that library.

You could also set up a library for a certain project or program and scan all the records for that project onto the library site in Alfresco.

If you are like me, you may want to put this into a visual chart. See image 3 below for a high-level concept of a plan and library set up.

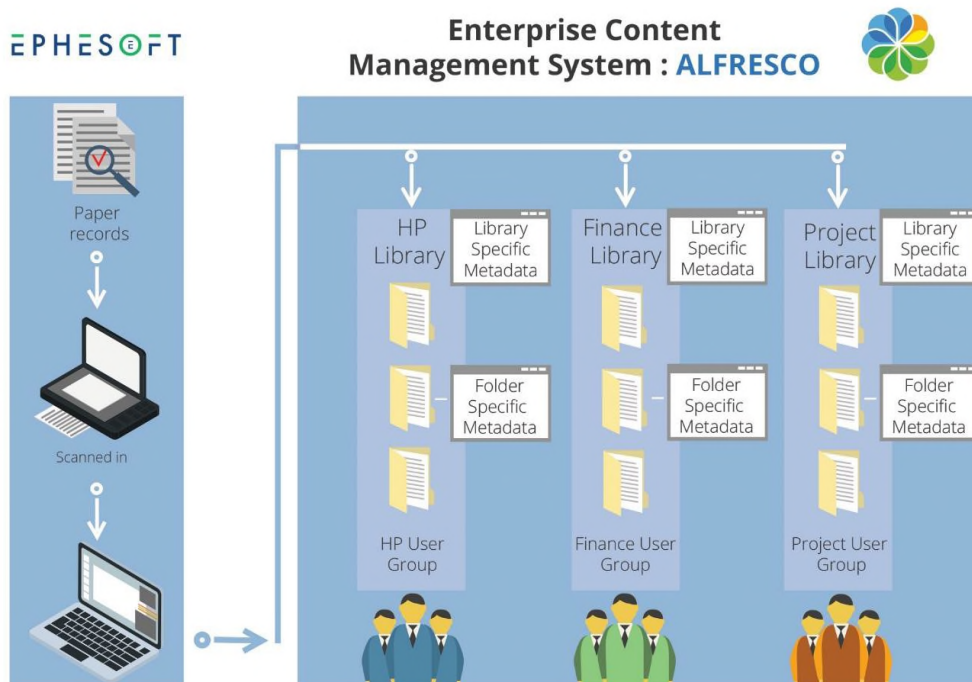


Image 3: Your high-level plan to get content into the system can be put into a simple diagram to help visualize your structure.

Of course, how your library will look depends on your data and your organization's needs. You may have dozens of top-level categories with a handful of sub-categories. Or, it can be similar to the image, with a handful of top-level categories, and multiple sub-categories. It all depends on your specific needs.

## Configuring Your Library to Help You Stay Compliant

This type of configuration can help you do several things:

- It can help you organize things by a certain group, topic or category.
- It can help you with permissions and user access – only give access to that library for users on a “need to know” basis.
- It can help you classify and add security markings to content as needed.
- It can help you add the proper metadata that is specific to that content type/topic/category only. Certain metadata that applies to HR may not apply to the Project Library and vice versa. You can add special metadata to a certain Library to be automatically added to that group of information or subfolders within the Library.
- It can help you map your content from the library site directly to a spot in the File Plan (on the Records Management Site in Alfresco) so that as the content is being added to the folder structure in the group site library, it can also obtain its future Retention Schedule. So, if/when the document gets declared as an official agency record, it will automatically get mapped to that spot in the File Plan Retention Schedule, making it seamless for both end-users and the Records Managers. See image 3.

## Smarter System – Seamless Mapping to Your Retention Schedule

With the above set up, the system can be “told” the answers to the following questions:

- What area of the agency is the content from? (example: HR site Library)
- What are the major topics of the content? (example: ‘Applications’ folder in the HR Library)
- What year is the content from? (example: 2012 – can be metadata or in a 2012 folder)

Example: Content is from Library: “HR,” the content was put into the folder “Applications,” the content was labeled as being a “2012 document” (upon ingestion with Ephesoft) or it was added to a 2012 folder. It was also marked as an official record (upon ingestion or at a later point in time after ingestion). From this information above, can you properly give it retention (cutoff/disposition) date? Yes, in most cases. OK good, then you can now map it to the “2012 HR Applications” folder in your File Plan/Retention Schedule and from that point on the system does the rest under the Records Managers’ control.

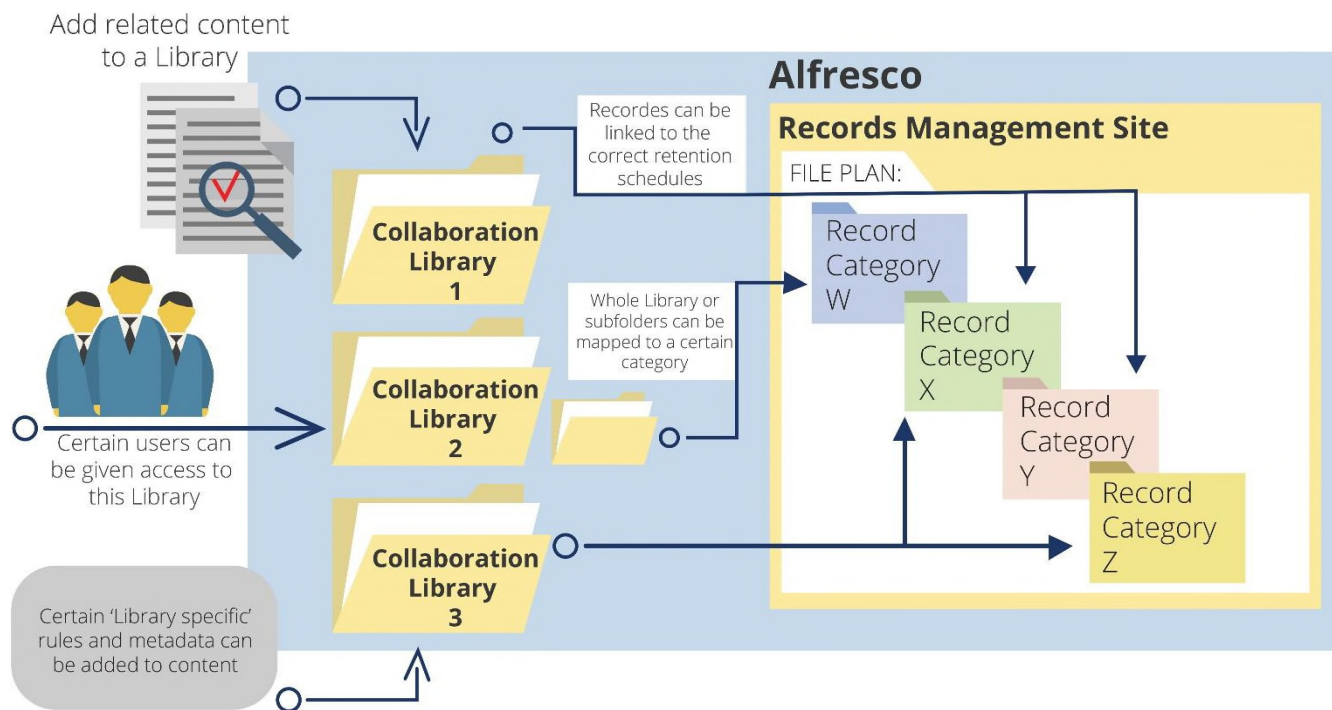


Image 4: Content can be managed and mapped to a certain spot in the File Plan for retention controls.

## When Ingesting, Use a Tool like Ephesoft

Ingesting your content through Ephesoft is a very popular and less time-consuming way to do things. This tool will help you process the content in a batch and add the needed metadata before it hits the target library.

If you use Ephesoft, you can improve your paper-to-electronic processing time by 80%, collecting metadata along the way before it hits the target electronic library.

This is vitally important because when you add content into a system, the system typically adds the timestamp of when it is ingested into the system, but it may not know the date of the document.

For instance, you may be scanning in documents from 2012. This is vital information to you and Records Management, but the content is going into the system today, in 2019! So, Ephesoft can help you to make sure your content is being properly labeled so that you can properly disposition it later.

When your content is labeled properly, e.g. "Document Date 2012," now Records Management controls know not only the schedule it is under, but also the date from which to start the retention countdown. You can put this content in a 2012 folder, or add "2012" metadata to the document, and the system takes it from there.

## Part 2 Wrapping Up

As the process of meeting the NARA 2019/2022 Deadlines is quite complex, you'll need to do a lot of planning and mapping out how your content will be organized. Spending time in the planning stage, using the key questions I've listed above, will save your organization countless hours in the future.

Having a well-organized database is key to efficiency and using a tool like Ephesoft for batch-processing will help you digitize your documents at a much faster pace.

## Part 3: Implementation

The NARA 2019/2022 Deadline is looming. Organizations are scrambling to get organized and meet the deadlines. But, going fully digital isn't something you can just fly through. There are dozens, even hundreds of questions to consider, from mapping out your content to mapping your new database, to organizing metadata, there's a lot to do. I've covered these details in the previous 2 sections.

Now let's wrap up this three-part paper by discussing the 'day forward' content and the lifecycles that you can create for your content.

### What's a Records Lifecycle?

Wikipedia defines a records lifecycle as "the records management phase of the records life-cycle consists of creation, classification, maintenance, and disposition."

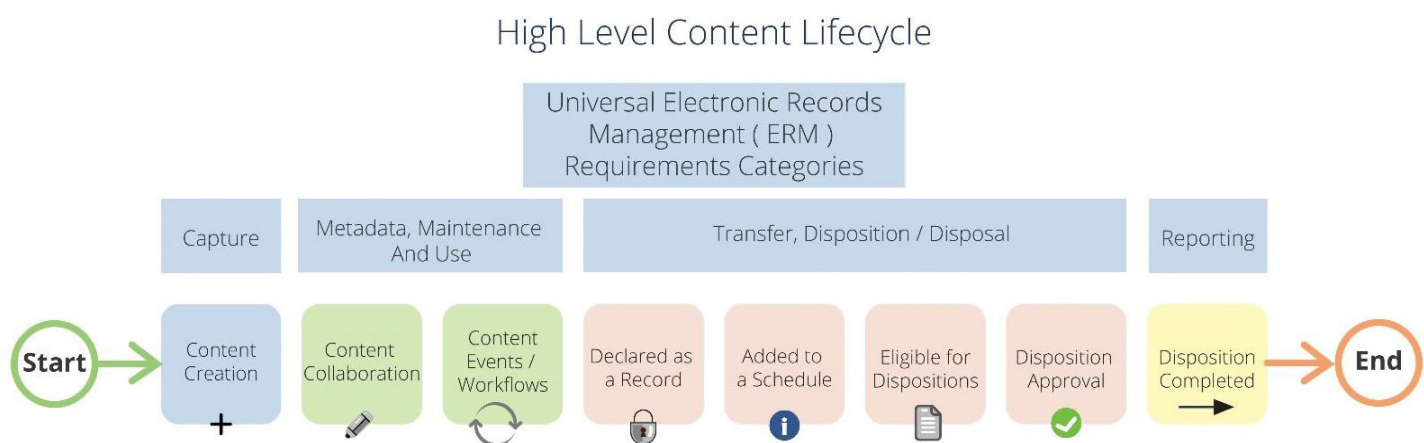
In my diagrams (images 5 and 6 below) I will be using NARA's Universal ERM Requirements categories for sectioning of the lifecycles:

- Capture
- Metadata, Maintenance, and Use
- Transfer, Disposition, Disposal
- Reporting

In the previous section, I covered the importance of making a plan for your content and making a plan for your scanned-in content. In this last section, let's cover the lifecycle topic in more detail.

### Implement a Lifecycle for Day Forward Content

To begin, let's take up a simple example of a high-level electronic record lifecycle.



Using NARA's Universal Electronic Records Requirement Categories, I created a basic lifecycle of a typical record. Mapping out a high-level flow for your own agency can help you stay organized when creating a breakdown for other record types. Some things you may want to keep uniform throughout your agency, so I always suggest making your own high-level lifecycle first and then making some detailed ones for more specific content types.

Once you have a plan for your content, as I discussed in Part 2, you can use a detailed lifecycle to help you map out what critical steps need to occur with the content during its "life." This may only be for "Day Forward" content and may or may not apply to your 2019 and 2022 scanned in content.

But either way, it can be a very important piece to think about when configuring your system to do what you, and the end-users, need it to do. It will also help you stay compliant to mandates going forward.

So, gather your document types and categories and work out a more specific Lifecycle for each. Start with Vital Records or mission-critical processes.

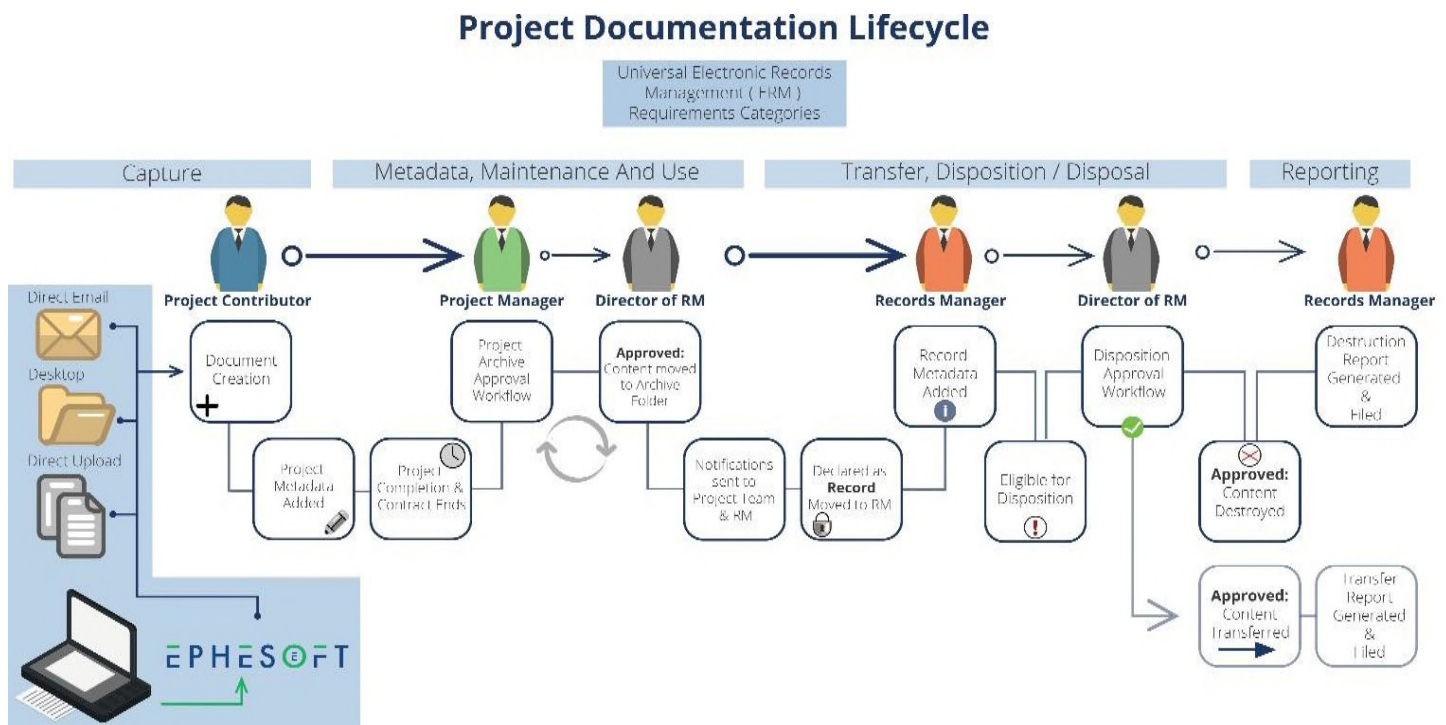


Image 6: Example of a Detailed Record Lifecycle

In this detailed lifecycle, I show an example of what one agency's "Project Documentation" is supposed to go through. This can greatly differ from agency to agency, but it helps to map it out. In this example the steps are:

- Content can be ingested in several ways into the Project Library (document creation).
- Project-specific metadata is added automatically (like project name, start date, etc.).
- After some time, the project gets completed and "closed out."
- The Project Manager creates a Project Archival workflow to get approved for archival.
- The Director of Project Management approves the project closeout.

- Upon approval, the content is moved to the “Archive” folder on the project site making the content still available to those who still have access.
- Due to the rules set on this folder, the moved content is declared as a “record” and sent to the Records Management Site File Plan in the proper Retention Schedule Category.
- A notification is sent to the RM team letting them know that the project was closed out and has arrived for further controls/steps.
- Record specific metadata is added to the content after arriving into the RM site.
- At some point based on its embedded retention schedule, it is eligible for cut-off.
- At some point based on its embedded retention schedule, it is eligible for disposition (Destroy or Transfer per this example).
- Before content is destroyed or transferred it is sent through an approval workflow to the Director of Project Management.
- Upon approval, the applicable Record Management staff destroy the content (or perform the transfer) and create a disposition report and file it along with the disposition certificate.

Remember, this is just a sample I’ve put together. Use it as a guideline, not as an exhaustive list. Each plan will differ based on your organization’s specific needs.

## What Can go in a Lifecycle?

A lifecycle can vary from agency to agency, document to document, department to department. So, the answer to that question can be answered with another question – “How many things can be done to/with electronic content?” SO MUCH!

Here are some high-level areas to consider. Any one of these, in some way, could be a part of a record lifecycle, several times:

- Ingestion (scanning/imaging)
- Transferring
- Importing
- Migration
- Conversion
- Metadata (manual/automatic addition/changing of metadata at different points in the lifecycle)
- Editing
- Publishing
- Downloading
- Workflows
- Queue processing
- Approvals
- Encryption/decryption
- Security changes (addition of markings or downgrade of markings)
- Versioning (up or down)
- Notifications
- User access (granting or retracting)

- Copy/move (from one library/folder to another)
- System integration activities
- Declaring a document as an official agency record
- Archiving
- Cut-off or event declaration
- Destruction
- Ascension
- Transfer
- Reporting (automatic or manual reports)
- Audit log updates/reports
- Legal hold/freezes

You'll want to think through all of these and make sure you fully understand what your data needs are and anticipate any changes in the future. It won't hurt to check more checkboxes here, even if you don't have a need for some of these stages.

## Document Everything (Even Though it's a Lot of Work)

Creating a detailed lifecycle for your record can be a lot of work. So, the reasons for creating these may need to be thoroughly justified and prioritized. You may need to start with only vital records and chances are, there is already a lifecycle in place for them it's just a matter of documenting them, so they can be recreated in the electronic world.

Why document them? Well maybe it's best to sort out the requirements on the lifecycles and their processes in order to configure them correctly and you can't do that without documenting what the lifecycle for the record is.

But why should we go through all of this work for record lifecycles?

Well, the answers can vary... maybe it is because in order to fully comply with regulatory, fiscal, audit, NARA and retention demands you need to sort out the requirements and lifecycle around your vital records, so you can be sure you are meeting all of these demands!

Once you do this, configuring your ECM to stay compliant is much more straightforward. For instance, even if you just had a diagram (like image 6 above) and a set of requirements for each of your vital records lifecycles, you could implement things electronically much faster!

I say "vital records" because to me, that is a logical place to start. But you can do this for all/any of your content based on your own criteria.

An information governance plan can greatly help you with this!

As I stated in part 2 of this text, it really helps to create an Information Governance Plan. This plan will lay out all of your regulatory, fiscal, audit, NARA and retention demands (and much more).

## Part 3 Wrap-Up

Going through all the steps of assessment, planning, execution, documentation, and fulfilling the requirements of NARA 2019/2022, is quite the task.

In this three-part report, I hope I've helped you understand the complexity and importance of each step. And I hope you've seen that there is a system to achieve this. It's not a copy-paste system, but it's a solid set of guidelines to get you to full compliance.

There are tools to help along the way. Tools like Alfresco and Ephesoft.

I hope this can help! Please let us know if you have any questions.

## Last Thoughts

The NARA 2019/2022 Deadline is looming. With the rising pressure, agencies may be tempted to rush through the process, relying on ad-hoc solutions, and hope for the best. However, this approach can create serious problems. Planning is a must.

The plan however, cannot be a copy-paste approach. Each agency will have its own set of challenges that will require expertise. Using a cookie-cutter approach in the Planning stage can result in errors, reworks, and even data loss.

This is why planning of the digitization process is crucial to a successful project.

Armedia LLC is a veteran in the digitization and content management industry. With 20 years of experience, our team can reliably map the needs of the organization, translate business needs into technical specifications, and then execute all the technical steps.

Armedia has established partnerships with key technology providers like Alfresco and Ephesoft.

Our experts are available for a free consultation. Feel free to reach out to us via the [Contact Us](#) page or give us a call.

### DC

8221 Old Courthouse Road,  
Suite 300  
Vienna, VA 22182  
(571) 395-4800

### GEORGIA

2000 Riveredge Parkway NW  
Suite 775  
Atlanta, GA 30328  
(770) 615-4215

### FLORIDA

4842 51st Court  
Vero Beach, FL 32967  
(866) 398-0323