NARA and Records Management in the New Year

December 10, 2020

Digital Government Institute

DGI Webinar

National Archives
Office *of the* Chief Records Officer

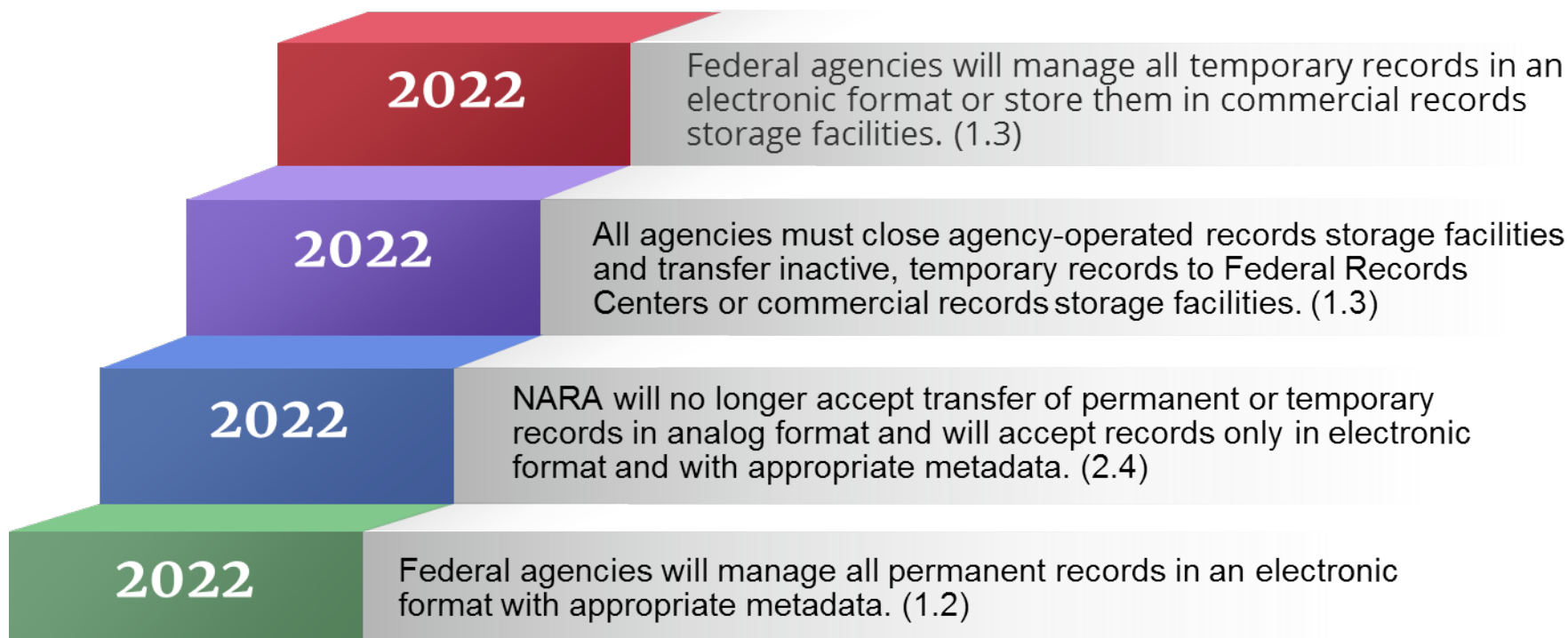# NARA Bulletin 2020-01, Guidance on OMB/NARA Memorandum Transition to Electronic Records (M-19-21)

Laurence Brewer, Chief Records Officer for the U.S. Government

M-19-21: Transformational Targets

On June 28, 2019, the Office of Management and Budget (OMB) and NARA jointly issued a memorandum with guidance on transitioning to electronic records ([OMB/NARA M-19-21](#))

2022 — Federal agencies will manage all temporary records in an electronic format or store them in commercial records storage facilities. (1.3)

2022 — All agencies must close agency-operated records storage facilities and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities. (1.3)

2022 — NARA will no longer accept transfer of permanent or temporary records in analog format and will accept records only in electronic format and with appropriate metadata. (2.4)

2022 — Federal agencies will manage all permanent records in an electronic format with appropriate metadata. (1.2)

After M-19-21's release, we met with agencies, gathered data through annual reporting, learned from agency practices during inspections and assessments

We received many questions from agencies, including general questions, exception process questions, records storage facility questions, and scheduling and transfer questions since M-19-21 was issued

In September 2020, we issued NARA Bulletin 2020:01 Guidance on OMB/NARA Memorandum Transition to Electronic Records (M-19-21) to respond to many of those common questions and provide further guidance related to specific requirements in the memorandum

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The Bulletin provides more detailed information on exceptions as required by the Memorandum, including:

- General questions

- Exception process questions

- Records storage facility questions

- Scheduling and transfer questions

These categories include cases where replacing analog records with electronic records or systems would be:

- Burdensome to the public

- Cost would exceed the benefit

- Prohibited by statute or regulation

The Bulletin includes guidance for certain types of analog records that may require an exception:

- Records with potential intrinsic value
- Classified records
- Fragile records where digitization is cost-prohibitive

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Exception requests will be considered in the context of an agency's strategic plan for managing their records

Agencies should submit one request to cover all the records series they believe need exceptions

Requests should explain reasons for requesting an exception, identify the duration of exception, and include a business case and plan for the transition to full compliance

Requests must be signed and submitted by the agency's SAORM Submit requests to rmstandards@nara.gov
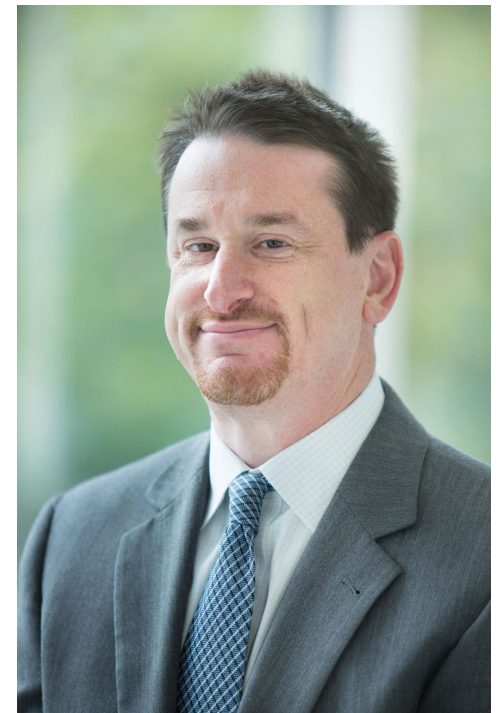
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Highlights of the 2019 Federal Agency Records Management Annual Report and 2020 Plans

Don Rosen, Director of Records Management Oversight and Reporting

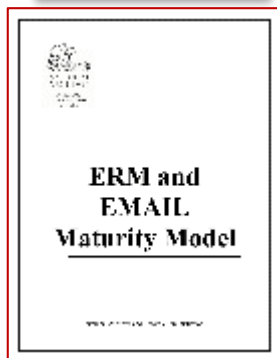**Office of the Chief Records Officer**

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SAORM

Focused on M-19-21— Did your agency meet the managing permanent e-records in electronic format target date of 12-31-2019? How does your agency plan on meeting the targets for 12-31-2022?

ERM and EMAIL Maturity Model

NEW

Agency records officers assess their individual agency's electronic records and email management using a risk based maturity model template based on Universal ERM Requirements and NARA's published success criteria.

RMSA
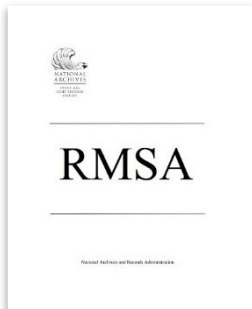
Agency records officers provide an evaluation of their individual agency's compliance with Federal records management statutes, regulations and program functions.

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- Gather information in a consistent and uniform manner

- Identify emerging trends

- Provide some level of feed back to agencies with a score

Agencies

- Determine weaknesses

- Apply limited resources more appropriately

- Use scores to measure effectiveness of their RM programs

- Use to leverage support for RM program

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- Approximately 70% of agencies met the goal to manage permanent electronic records in electronic format by December 31, 2019

- Agencies (97%) believe they will meet the December 31, 2022, deadline to manage permanent records in electronic format with appropriate metadata

- Agencies (93%) indicated that they will be able to manage temporary records in electronic format

- Records are already created and maintained electronically

- Email management is more mature than electronic records management overall
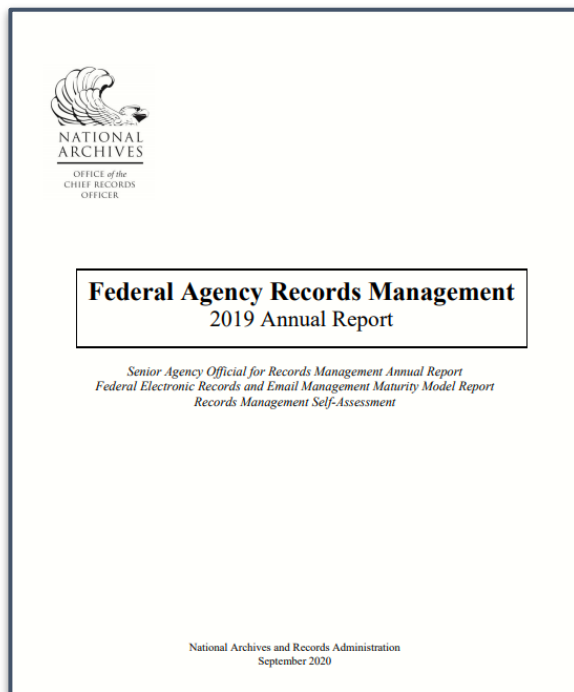
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Progress is being made

All records
maintained in
electronic format

Policies, procedures,
guidance are being
created

Federal Agency Records Management
2019 Annual Report

Senior Agency Official for Records Management Annual Report
Federal Electronic Records and Email Management Maturity Model Report
Records Management Self-Assessment

National Archives and Records Administration
September 2020

Digitization/Scanning
in use or planned

Metadata is or will be
associated

ERMS/ERKS/EDMS/ECM/RM
A in use or planned

Records maintained in Electronic
Information System(s)

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Strategies for Meeting M-19-21

- Managing permanent electronic records and related metadata
- Digization to reformat permanent records created in hard copy or analog format
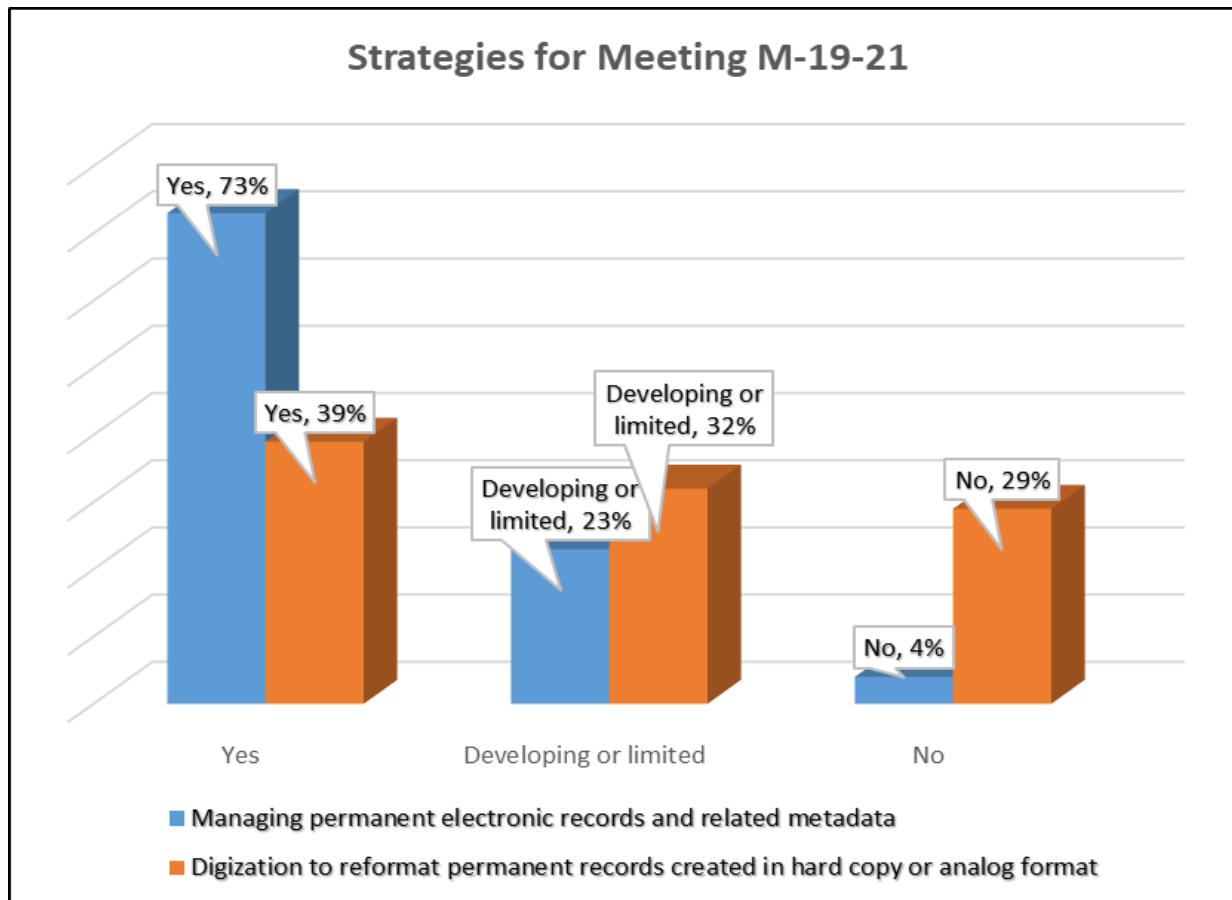
- Federal Records Management Annual Reporting for 2020
  - SAO Report, RMSA, and Maturity Models
  - https://www.archives.gov/records-mgmt/resources/self-assessment.html

- Semi-Annual Report on Records Management Oversight Activities

- Records Management Inspections and Assessments
  - https://www.archives.gov/records-mgmt/resources/rm-inspections

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Overview of Recent NARA Products

Lisa Haralampus, Director, Records Management Policy and Outreach

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- December 2, 2020 proposed regulation on digitization standards for permanent records (36 CFR 1236)
- December 2, 2020 proposed regulation on reviewing schedules that are 10 years old (36 CFR 1224/1225)
- November 25, 2020 Archivist memo to agency heads on records management during presidential transition
- October 20, 2020 updated COVID FAQ
- October 19, 2020 NARA white paper on Cognitive Technologies
- October 1, 2020 NARA Bulletin 2020-02 Guidance on Scheduling the Early and Late Transfer of Permanent Records
- October 1, 2020 NARA Bulletin 2020-01 Guidance on OMB/NARA Memorandum, Transition to Electronic Records (M-19-21)
- September 29, 2020 AC Memo 27.2020 for review of agency-specific schedules approved prior to January 1, 1990
- September 28, 2020 Federal Agency Records Management Annual Report, 2019
- September 23, 2020 FAQ on Records Scheduling and Appraisal
- September 23, 2020 FAQ on the Agency Records Officer Credential (AROC)
- August 5, 2020 Navigational Chart Formats
- June 25, 2020 AC Memo 20.2020 about sending Federal records to NARA during the pandemic
- April 30, 2020 draft universal use cases (FERMI activity)
- April 6, 2020 Universal Electronic Records Management (ERM) Requirements, Version 2
- March 27, 2020 Records Express blog about our office's current operating status related to the pandemic
- February 10, 2020 files containing machine readable GRS Schedules

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Draft standards for the digitization of permanent records have been posted for comment and are available for review until **February 1, 2021** at:

https://www.federalregister.gov/documents/2020/12/01/2020-26239/federal-records-management-digitizing-permanent-records-and-reviewing-records-schedules

The standards are:

- Required by the 2014 amendments to the Federal Records Act and will be codified in 36 CFR 1236, where standards for digitizing temporary records are located.

- Consistent with other technical standards, including ISO and FADGI

- Applicable retroactively to digitized records not yet transferred. If previously digitized records are not compliant with the final standards, agencies may:

  1. Re-digitize the source records
  2. Submit an agency-specific schedule
  3. Transfer source paper records to NARA prior to December 2022
  4. Request an M-19-21 exception

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Proposed Regulation

- 36 CFR 1224.10 & 1225.22
- Review, every five years, all records schedules that are ten years old and older, based on date NARA approved the schedule.
- Same rule-making package as digitization regulation

NARA Bulletin 2020-02, Scheduling the Early and Late Transfer of Permanent Records

- Superseded NARA Bulletin 2015-01
- Same guidance for scheduling permanent records with retention periods less than 15 years
- New guidance for scheduling permanent records with retention periods more than 30 years

FAQ on Records Scheduling and Appraisal

- Answers to common questions asked by people unfamiliar with federal records scheduling process
- Why are records destroyed?
- Why does NARA appraise records?

Machine Readable GRS Schedules on Data.Gov

- Searchable and manipulable versions in comma-separated value (.csv)
- Contain raw data (minus PII) exported from Electronic Records Archives (ERA)
- data files along with a data dictionary are available for download as a .zip file

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To quote the Archivist . . .

In times of transition, it is crucial that agency heads work with their Senior Agency Official for Records Management and Agency Records Officers to ensure that the importance of records management during transition is communicated within the agency and that all agency officials and employees are properly briefed on their records management responsibilities. NARA has resources to help you meet your agency's legal obligations, promote effective business operations during the transition, and preserve your agency's enduring historical record

Records Express blog posts:

- Managing Official Email and Social Media Accounts
- Entrance and Exit Checklists for Senior Officials
- General Resources from NARA and GSA

NARA webpage:

- Documenting Your Public Service

COVID FAQ

- Discusses records management when teleworking
- Discusses records scheduling and retention
- Existing GRS items will be updated for records related to federal employees return to facilities

Cognitive Technologies: Records Management Implications for the Internet of Things, Robotic Process Automation, Machine Learning, and Artificial Intelligence

- Provides a basic description of each of these technologies, examples of their various applications, and enabling factors supporting the technologies
- Considers the records management implications of cognitive technologies

Draft Universal Use Cases

- Written from a high- level perspective to cover all types of electronic records
- Developed as part of NARA's FERMI initiative

Universal Electronic Records Management (ERM) Requirements, Version 2

- Version 1 was issued in August 2017
- Revisions to the abstract, lifecycle requirements, transfer format requirements, and glossary

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Records Express – Official Blog
http://blogs.archives.gov/records-express/

NARA Records Management Webpage
http://www.archives.gov/records-mgmt/

Switchboard, ca. 1948-2967. National Archives Identifier: 19996695.