




Criteria for Successfully Managing
**PERMANENT
ELECTRONIC
RECORDS**

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

MARCH 16, 2018



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electronic format. ”



NATIONAL
ARCHIVES

March 16, 2018

Memorandum for: Senior Agency Officials for Records Management

From: David S. Ferriero
Archivist of the United States

Subject: Criteria for Successfully Managing Permanent Electronic Records

The Office of Management and Budget (OMB) and National Archives and Records Administration continue to drive records management reform. I am pleased to see the progress agencies have made towards managing permanent electronic records in an electronic format by December 31, 2019.

NARA remains committed to supporting agencies as they work towards successfully meeting the 2019 target to electronically manage and preserve permanent electronic records. This includes collaborating with records management working groups and councils, providing new and clarifying guidance, and performing agency assessments.

This document provides criteria for successfully managing permanent electronic records. It includes a high-level view of the areas agencies must focus on to meet the 2019 target and a set of operational activities for agencies to accomplish. It also describes universal electronic records management requirements that provides further details to ensuring success across the life cycle of electronic records.

The successful management of all electronic records will continue to be a government-wide challenge as new technology emerges. It is important to work with your agency or agencies' leadership, records officers, and NARA to ensure permanent and temporary electronic records are effectively managed as we transition to a digital Government.

DAVID S. FERRIERO
Archivist of the United States



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OVERVIEW

NARA guidance states, “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.” This requirement applies to permanent electronic records wherever they reside. This means agencies will no longer be able to use paper processes to manage permanent electronic records.

Permanent electronic records often coexist with temporary records and will be found in a variety of systems, platforms, and technologies across agencies. Agencies must manage all electronic records - both permanent and temporary - whether they are located in approved or known IT systems, storage devices or drives, desktop productivity applications, collaborative spaces, social media, text messaging applications, shadow IT systems such as encrypted messaging applications, or anywhere else.

This document provides agencies with guidance for successfully managing permanent electronic records in compliance with the 2019 target. The components of the guidance are listed below:

1. **High-level View** - describes the four areas agencies need to strategically focus on for managing permanent electronic records.
2. **Operational Activities** - describes the tasks agencies should be accomplishing to electronically manage permanent electronic records by the 2019 target.
3. **Universal Electronic Records Management (ERM) Requirements** - describes the program and system functionalities that apply to managing all electronic records, including both permanent and temporary electronic records.



Figure 1: Location for Electronic Records

This document also includes a crosswalk for these three sections demonstrating the relationship between them to clarify how these products assist agencies on a path to success.

Senior Agency Officials for Records Management (SAORM) and Agency Records Officers are the primary audience for this guidance, but it also applies to Chief Information Officers, Chief Data Officers, and General Counsels. It should be used to identify and address gaps in existing agency records management program practices. NARA will develop a maturity model that assesses progress in dealing with the complexities of managing permanent electronic records. An example of the questions that will be in the maturity model can be found in the Appendix. It depicts how additional maturity model questions will be structured and how agencies will be measured on a numerical scale. Agencies will be able to use the complete maturity model, when published, to monitor their individual progress in managing permanent electronic records.

NARA recognizes that most agency information systems contain both permanent and temporary records. Accordingly, this guidance will have some application to temporary records, but it primarily addresses requirements for electronically managing permanent electronic records.

Additionally, this success criteria document does not include guidance for the digitization of paper records. It is intended to apply to permanent records created and maintained electronically, including those records that have already been digitized. Agencies should implement business processes that support permanent electronic records to the fullest extent possible, and eliminate the need to produce and manage hard copy and analog records.

1. High-Level View

To successfully manage permanent electronic records, agencies must address four key aspects of records management. They must have effective **policies** and **systems**, the ability to provide **access** to the records, and the ability to execute **disposition**.

Policies: Agency-wide policies and training must inform all personnel who create, receive, access, or use Federal records of their records management responsibilities. Policies should be developed with all relevant stakeholders and must address the requirements of the [Federal Records Act \(FRA\)](#), [36 CFR Chapter XII Subchapter B](#), and other relevant guidance issued by NARA and OMB, such as [OMB Circular A-130](#).

What Success Looks Like: Your agency's policies fully explain how to manage permanent electronic records and training programs educate staff on their responsibilities for managing all electronic records.

Systems: Agencies must have control over their permanent electronic records so that they can create, capture, manage, preserve, and transfer them to NARA in acceptable electronic formats. Such control may be automated in dedicated records management systems or implemented manually in shared drives, data repositories, or other types of storage. Additionally, IT systems must support the implementation of agency records management policies and provide access to permanent electronic records throughout their lifecycle, which can span decades.

What Success Looks Like: Your agency's IT systems developers consider records management requirements throughout the systems development process. As a result, your agency's systems and business processes support the automated management of trustworthy permanent electronic records over time in accordance with all applicable requirements.

Access: Access to electronic records supports an agency's ability to carry out its business functions. Access to permanent electronic records ensures they remain usable and retrievable throughout their lifecycle.

What Success Looks Like: Your agency's permanent electronic records are protected against unauthorized access, use, alteration, alienation, or deletion; and are searchable, retrievable, and usable for as long as they are maintained in agency custody.

Disposition: This area is equally critical for successfully managing permanent electronic records. Agencies must follow the mandatory instructions contained in either agency-specific records schedules or the appropriate [General Records Schedule](#) to transfer permanent electronic records to NARA's legal custody.

What Success Looks Like: Agencies are operating with NARA approved records schedules. Agencies are successfully completing transfers of permanent electronic records to NARA in acceptable formats and with the appropriate metadata.

2. Operational Activities

There are many operational activities agencies must complete to effectively manage permanent electronic records. The following activities are fundamental and should be conducted routinely and repeated as necessary. The order and number of times they are repeated depends on the maturity of



Figure 2: Operational Activities Wheel

your agency’s records management program. Due to the variances in size, structure, culture, and other factors, agencies may need to incorporate additional activities to meet their business needs.

OPERATIONAL ACTIVITIES TO ACCOMPLISH ARE:

Prioritize and allocate resources. Agency senior managers must ensure sufficient budgetary resources are available and prioritized for managing permanent electronic records, including people, processes, and tools.

Train records management staff. Agency managers must designate and train records management staff, including records officers, records custodians, and other agency liaisons.

- Train records management staff to effectively perform the duties as described in [OPM occupational series 0308, Records and Information Management](#).
- Ensure designated Agency Records Officers have obtained NARA's Federal Records Management Training certificate.

Review records schedules. Agency records management staff must perform a detailed review of permanent records scheduled in existing agency-specific records schedules and applicable General Records Schedules. As part of the inventory and analysis process, RM staff should:

- Account for electronic records series and systems identified as permanent.
- Assess whether records series have become obsolete or superseded.
- Identify any unscheduled electronic records.
- Work with NARA appraisal archivists to prioritize the scheduling of all electronic records proposed for permanent retention.

Consult stakeholders. Agency records management staff must consult with agency offices regarding schedules, including program offices, legal offices, and IT to validate records schedules for permanent electronic records.

- Identify any unscheduled electronic records (which must be treated as permanent until determined otherwise), focusing on systems known or expected to contain permanent records.
- Confirm the owners of the permanent electronic records identified during the records schedules review.
- Consult with Chief Information Officers, Chief Data Officers, Chief Technology Officers, and IT enterprise architecture staff to identify data maps for systems containing permanent electronic records.
- Participate in the Systems Development Lifecycle and Capital Planning and Investment Control processes to ensure permanent electronic records are appropriately identified and scheduled.
- Assess impact of changes in technology or business processes on retention or disposition instructions.

Maintain systems. Agencies must maintain permanent electronic records for the duration of their retention periods. Often these retention periods span several decades to support an agency's continuing business needs for the records before they are transferred to NARA's physical and legal custody. Below are several system requirements, based on the universal ERM requirements issued by NARA in August 2017, that describe what systems must do to properly maintain permanent records over time. The applicable universal ERM requirement number is noted after each activity below.

- Allow access to permanent electronic records wherever they reside. This includes access to records stored on personal hard drives, personal network drives, email personal storage table (.pst) files, and individual cloud storage spaces. This also includes access to records in public, private or community cloud environments. (0.01 - 0.07, 2.05 - 2.11)
- Allow access to permanent electronic records of current and separated employees as long as needed to conduct agency business. (2.01)
- Prevent unauthorized access, alteration, or concealment of permanent electronic records. Examples include access lists, monitoring, and agent validation. (0.03, 0.06, 1.04)
- Ensure that audit trails are in place to track use of the records, including all events and actions related to the record by person entities and non-person entities. Actions changing the level of access, updating the record, or changing the location of the permanent electronic record must be documented and tracked into an audit log. (2.04, 1.09)
- Systems contain useable records that can be located, retrieved, presented, and interpreted, and will be updated or migrated as necessary to ensure continued usability over time. (1.05)
- Systems contain authentic records that are what they claim to be; created or sent at the time and by the agent claimed to have created or sent the records. (1.06, 1.07, 1.08)
- Associate approved records schedules with the permanent electronic records and systems. (1.10)
- Retain records until after transfer to NARA has been fully completed. (4.07)
- During systems migration, all records and associated metadata in the originating system must be retained until the migration is complete and the destination system has been deemed reliable and secure. (4.04, 5.06)
- Generate and print reports, both routine and customized, that demonstrate effective controls and compliance with requirements for managing permanent electronic records. (6.01, 6.02, 6.03)

Prepare for transfer. Agency records management staff and IT staff prepare permanent electronic records for transfer.

- Comply with NARA format guidance and with metadata requirements for agencies seeking to transfer permanent electronic records to NARA. The most recent transfer and metadata guidance is available at <https://www.archives.gov/records-mgmt/policy/transfer-guidance.html>.
- Ensure permanent electronic records can be exported and transferred.
- Maintain and provide adequate transfer documentation that allows NARA to identify, process, and make available the permanent electronic records.
- Designate authorized users of NARA's [Electronic Records Archives \(ERA\)](#). This system is used for records scheduling and transferring permanent electronic records.

- Designated ERA users must have the training, expertise, and knowledge to submit unscheduled records for appraisal, as well as update existing agency schedules
- Separate temporary records, non-records, and personal materials from electronic records before initiating transfer to NARA.

Note: Agency staff should contact their records officer for information regarding ERA account access.

Execute transfer. Agency records management staff and IT staff transfer permanent electronic records to NARA.

- Agency ERA users are successfully creating Transfer Requests in the system and electronically submitting them to NARA for review and approval.

Institute policies. Agencies must ensure they have policies in place to effectively manage permanent records from creation to transfer. Policies need to address a wide variety of topics.

- Procedures for scheduling, managing, and transferring permanent electronic records to NARA.
- Policies for the use of digital signatures that support the creation and management of permanent electronic records.
- Notification and reporting procedures for unauthorized access, use, alteration, alienation, or deletion of electronic records.
- Incorporation of records management into the agency information resources management strategic plans.
- Incorporation of records management requirements into Systems Development Lifecycle and Capital Planning and Investment Control processes.
- Integration of records management into IT system design and development.
- Insertion of clauses in contracts to safeguard government-owned permanent electronic records, information, and associated data that is created, maintained, and stored on cloud or social media platforms owned by third party vendors.

Evaluate program and processes. Agencies must periodically evaluate their records disposition and transfer processes to identify issues and make improvements where necessary.

- Develop an internal process that leverages data from previous years' RMSA, SAORM, and Federal Email Management reports to target and correct program deficiencies and measure performance in between NARA reporting cycles.

- Implement policy and system audits to measure compliance with applicable records management statutes, regulations, and guidance.
- Identify and track permanent electronic records eligible or overdue for transfer to NARA.
- Develop a method for estimating and monitoring the volume, in terms of bytes, of permanent electronic records maintained by the agency.

In addition to these activities, agencies must consider the impact of the Freedom of Information Act, Privacy Act, cybersecurity, security classified information, controlled unclassified information, litigation, and other requirements on records management. Agencies that create and maintain permanent electronic records containing classified national security information must manage the records in accordance with 32 CFR Subtitle B Chapter XX Part 2001 and Executive Order 13526. If applicable to your agency, policies and training should explain how to appropriately handle electronic records containing classified national security information.

3. Universal ERM Requirements

The high-level view and operational activities for managing permanent electronic records offer insight into what success looks like and the specific steps agencies should complete. The third component of this document — the universal ERM requirements — provides further detail to improve an agency's ability to meet the 2019 target.

NARA first published a set of ERM requirements on its records management website in August 2017. These requirements are derived from existing NARA regulations, policy, and guidance. The requirements are available online at the following link <http://www.archives.gov/records-mgmt/policy/universal-ERMrequirements>. The universal ERM requirements consist of an abstract, a list of lifecycle requirements, a list of transfer format requirements, and a glossary.

All requirements are identified as either “program” requirements, relating to the design and implementation of an agency's ERM policies and procedures, or “system” requirements, providing technical guidance to agencies or vendors when creating ERM tools and specifications. The requirements are further identified as either mandatory (“Must Have”) or preferred (“Should Have”). These designations help agencies determine what functions their tools must perform, as opposed to those that are preferred. “Must Have” and “Should Have” requirements also help agencies prioritize procurement of these ERM tools according to their needs and financial resources.

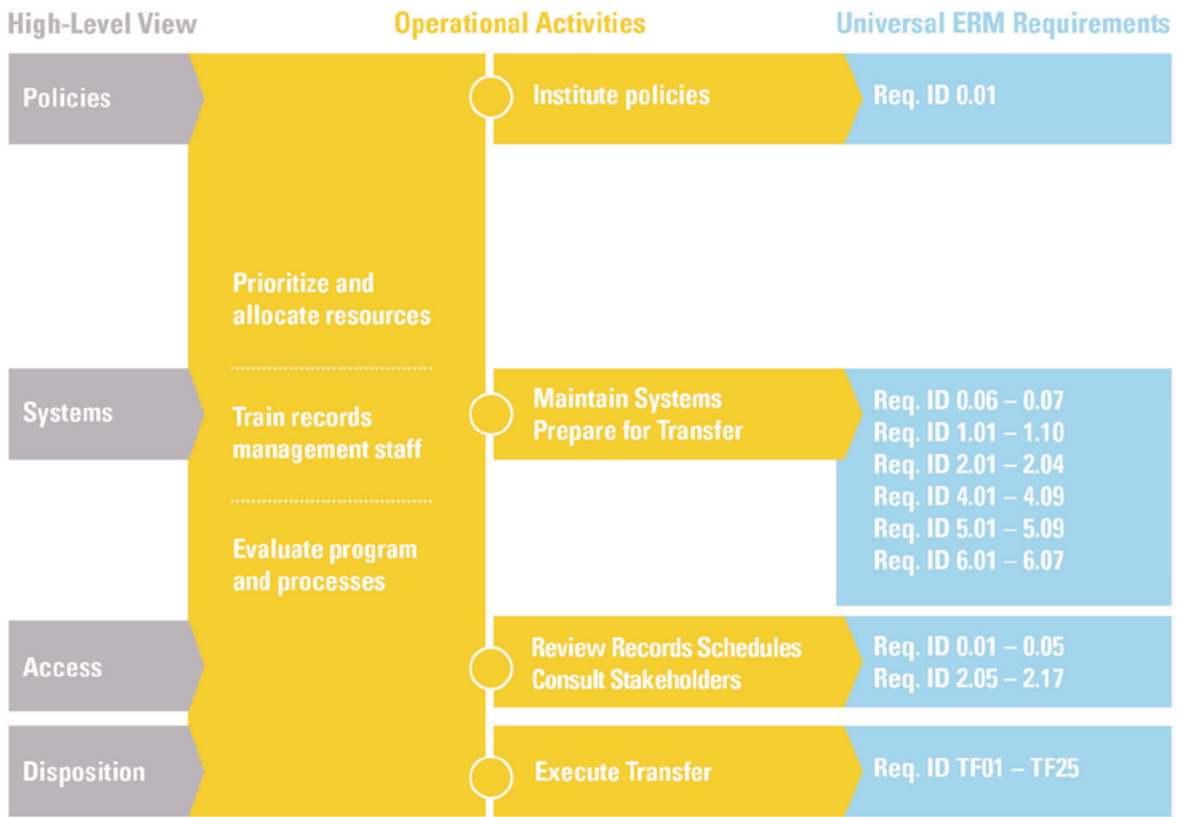


Figure 3: Success Criteria Components

To manage electronic records successfully, agencies must incorporate these requirements, and any additional agency-specific requirements, into their programs and systems. These requirements should be used when agencies develop, update, and migrate systems. Records management staff should work with acquisitions and IT personnel to tailor any final system requirements. As described in the above table, these requirements apply to the full lifecycle of records and are essential to understanding and accomplishing the functions and activities outlined in the high-level view and operational activities.

Conclusion

For many agencies, full implementation of the success criteria for electronic records management is an ongoing process that continues beyond 2019. NARA recognizes that some agencies may be stronger in some aspects of electronic records management than others. Organizational complexity, schedule development, and budgetary or procurement constraints affect each agency’s ability to meet specific criteria. NARA also recognizes that managing electronic records effectively does not end on December 31, 2019.

Agencies should identify SAORMs to champion the acquisition of ERM technologies, and also consider digitizing hardcopy and analog records for business use. NARA envisions a future where agencies have instituted automated records and information processes that effectively and efficiently capture, store, share, retrieve, dispose, and transfer official records with minimal user interaction. This type of information environment will enable agencies to document decisions and actions more effectively.

Agencies should continue to participate and learn from the experiences of other agencies. The NARA-led Electronic Records Management Automation Working Group and the agency-led Federal Records Officer Network (FRON) frequently discuss the steps agencies are taking to improve compliance with records management requirements and electronic recordkeeping. For more information about joining these groups, contact PRMD@nara.gov.

Contact Information

If additional information is needed, or if you have questions, please contact your agency's Records Officer, NARA Appraisal Archivist, or appropriate records management contact. Please refer to the list of [NARA contacts for your agency](#).

For questions related to the transfer of electronic records and their accompanying metadata, you should consult with the National Archives and Records Administration, Electronic Records Division, Processing Branch (RDEP), 8601 Adelphi Road, College Park, MD 20740, telephone number (301) 837-3420, or by email to Etransfers@nara.gov.

Resources

[Criteria for Managing Email Records in Compliance with the Managing Government Records Directive \(M-12-18\)](#):

This document describes the policies, systems, access, and disposition requirements for successfully managing agency email records.

[Executive Order 13526 – Classified National Security Information](#):

This Order prescribes a uniform system for classifying, safeguarding, and declassifying national security information, including information relating to defense against transnational terrorism.

Federal Integrated Business Framework (FIBF):

The Federal Integrated Business Framework is a model that enables the Federal government to better coordinate and document common business needs across agencies and focus on outcomes, data, processes and performance. It is the essential first step towards standards that will drive economies of scale and leverage the government's buying power.

Guidance on Managing Email (OMB M-14-16):

This Memorandum is a follow on to the Directive (M-12-18) that reminds Federal agencies about their records management responsibilities regarding managing email records.

Managing Government Records Directive (OMB M-12-18):

This Memorandum marked the beginning of an Executive Branch-wide effort to reform records management policies and practices and to develop a 21st-century framework for the management of Government records.

NARA Bulletin 2017-01: Agency Records Management Training Requirements:

This Bulletin specifies how often agency records management training must be administered, who must complete the training, and identifies mandatory content areas. The Bulletin provides promising practices intended to address the learning needs of personnel based on their position-level, role or responsibility.

NARA Bulletin 2015-04: Metadata Guidance for the Transfer of Permanent Electronic Records:

This Bulletin defines the minimum set of metadata elements that must accompany transfers of permanent electronic records to the National Archives.

NARA Bulletin 2015-02: Guidance on Managing Electronic Messages:

This Bulletin provides records management guidance for electronic messages.

NARA Bulletin 2014-06: Guidance on Managing Email:

This Bulletin reminds Federal agencies about their records management responsibilities regarding managing and retaining email.

NARA Bulletin 2014-04: Revised Format Guidance for the Transfer of Permanent Electronic Records:

This Bulletin specifies which file formats are acceptable when transferring permanent electronic records to NARA. This Bulletin contains an appendix that will be updated to reflect the continual format changes in how agencies create and use electronic records.

Universal ERM Requirements:

These requirements described in Section 4 provide standards for agencies to manage their electronic records, help vendor's capabilities for ERM tools, and help agencies identify the best tools to procure for their needs.

Appendix. ERM Maturity Model Example Question

Moving towards the 2019 target, NARA will publish a maturity model to measure the current state of agency records management programs, specifically as it pertains to permanent electronic records. It will be based on guidance outlined in the above Criteria for Successfully Managing Permanent Electronic Records.

The question below is an example of what the maturity model may include as it relates to implementing **policies** for managing permanent electronic records. It also reflects how additional maturity model questions will be structured and demonstrates how agencies can use the criteria to measure their success using a zero (0) to five (5) rating scale.

Which of these levels best describes the state of your electronic records management policies?

Agency does not have any electronic records policies; relevant stakeholders have not been identified; training around electronic records does not exist, and there are no policies related to loss of records.

[Level 0 = 0 points]

Electronic records policies are being discussed with relevant stakeholders but have not yet been drafted. General training and awareness of records management roles and responsibilities exists but does not fully address electronic records. [Level 1 = 1 point]

Electronic records policies and training that include specific information about permanent electronics are underdevelopment with relevant stakeholders. Basic electronic records information is included in general records management policies and training; roles and responsibilities are identified, and there is an awareness of the threat of loss of electronic records. [Level 2 = 2 points]

Electronic records policies, created with relevant stakeholders, with specific information about permanent electronics have been drafted but not yet approved or implemented. There is a plan for implementation that includes training and awareness on roles and responsibilities and the threat of loss of electronic records. [Level 3 = 3 points]

Electronic records policies, created with relevant stakeholders, with specific information about permanent electronic records are in place and implemented throughout the agency. Agency-wide policies includes procedures for scheduling, managing, and transferring permanent electronic records to NARA; use of digital signatures that support the creation and management of permanent electronic records; notification and reporting procedures for unauthorized access, use, alteration, alienation, or deletion of electronic records; incorporation of records management into the information resources management strategic plans, as well as the Capital Planning and Investment Control and Systems Development Lifecycle processes. Policies require the insertion of clauses in contracts to safeguard government-owned permanent electronic records, information, and associated data created, maintained, and stored on cloud or social media platforms owned by third party vendors.

[Level 4 = 4 points]



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