



NARA 2022 Deadline Compliance Guide

Your Guide to Digitization

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NARA 2024
Deadline
Compliance:

Your Guide to Digitization

Executive Summary

In this guide, you will learn about the background and requirements for the NARA 2024 deadline. We'll cover what success looks like when it comes to compliance so that you can assess your readiness. Finally, we will discuss the three approaches to the digitization of government documents and records to help you determine which one is right for you.

What is NARA?

The National Archives and Records Administration (NARA) exists to protect, preserve, and provide access to historically valuable records of all three branches of the United States federal government. It is an independent agency that also administers the system of Presidential libraries, operates museums, and provides other public services including temporary oversight and storage of other government agencies' records.

28 million

cubic feet of other agencies' physical records stored and serviced by NARA

100,000

cubic feet of archival records in analog formats received by NARA annually

What is the NARA 2024 Deadline?

The United States federal government has had its eye on the amount of paper it processes for decades now. The Paperwork Reduction Act (PRA) was introduced in 1980 to reduce the burden of paperwork processing on government employees, businesses, and institutions. More recently, the Office of Management and Budget (OMB) has been working on a larger initiative to modernize the government's business practices by moving to a paperless system.

Meanwhile, improving the accessibility of public records is one of the key aspects of NARA's strategic mission of providing digital, next-generation finding aids to 95% of the holdings in the National Archives catalog by 2025.

5 Million

cubic feet of documents, photographs, films, and other records stored in analog formats by NARA only accessible in person (as of 2018)

12.5 Billion
pages

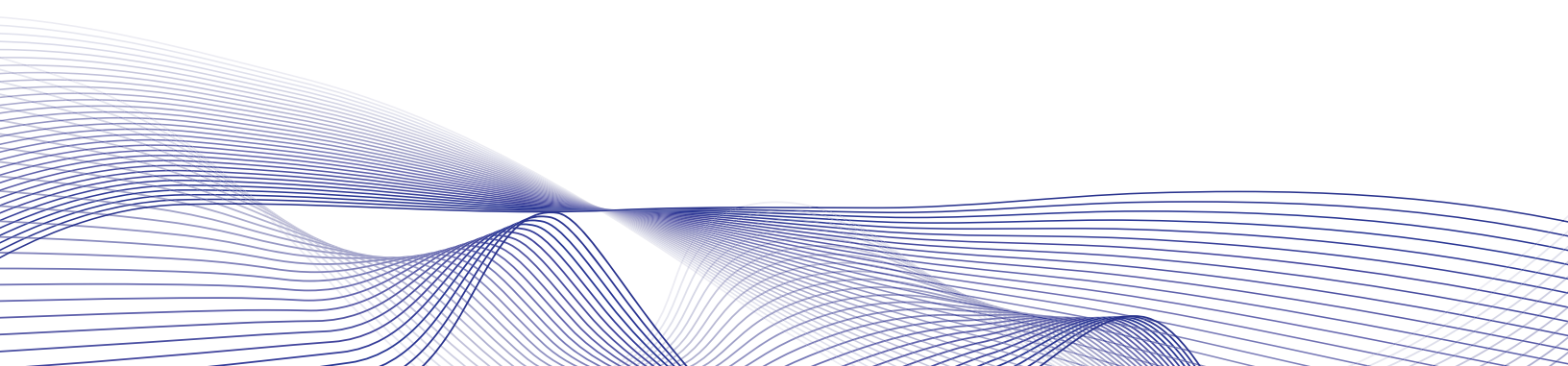
In 2019, the OMB and NARA took a key step together to advance both missions by issuing the government-wide policy memorandum M-19-21 regarding the Transition to Electronic Records. The memo announced that permanent records must be converted to digital format because NARA will no longer accept paper records after June 30, 2024. Agencies are also required to convert all temporary records to electronic format or store them in commercial storage facilities after June 30, 2024, barring them from operating their own on-premise physical records centers after the deadline.

Your Digital Transition: What Success Looks Like

No matter what approach you choose or which softwares you deploy to digitize your content, this is what success looks like for your compliance with the NARA 2024 deadline.

Documentation & Training

Your document and records handling procedures should be officially documented and made accessible to all employees in your organization. If you're adapting your business processes as a result of compliance with the mandate, you will need to work with your human resources team and other stakeholders to update these materials. You'll also need to develop an official communication plan for sharing new procedures with your teams. A structured training program should also be in place to ensure future employees that join your agency receive proper education on how to handle your paper and electronic content. Clarity and consistency are key in maintaining your compliance with the standards set forth in M-19-21.



Security

Securing sensitive information from external hacking attempts is a chief concern when it comes to the digitization of records. The Federal Information Processing Standard Publication 140-2 (FIPS 140-2) is the chief standard for encryption of federal government data. As a result of the 2014 Federal Information Security Management Act (FISMA), federal government agencies and departments that handle PII must use FIPS-certified cryptographic modules.

State and local agencies (and private contractors) may also be subject to comply with FISMA standards. If they handle personal data that comes from a federal source or if they administer federal programs within their jurisdiction, they must comply with FISMA.

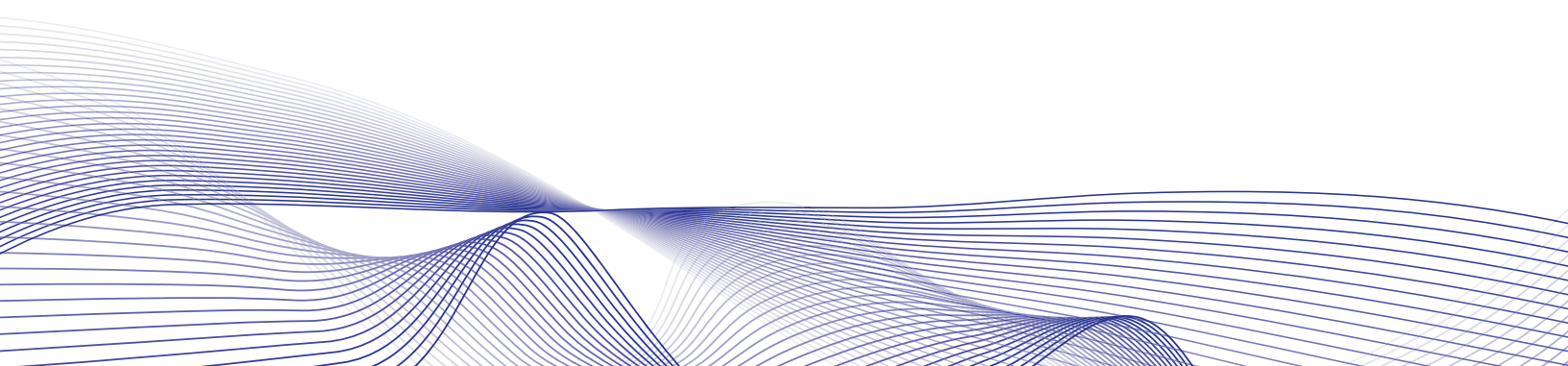
If the content services platform you select will run in the cloud, you must select a FedRAMP-authorized provider. Depending on the level of risk associated with the data you manage, you'll need to find a partner that can provide the level of security required for compliance: high, moderate, low, or low-impact SaaS.

In addition, building in permissions that prevent unauthorized internal users from accessing documents they shouldn't is another safeguard that is prudent to have in place. Automatically assigning these permissions will prevent user error that can unintentionally compromise sensitive information in your records.

Automation

Disposition of records according to your applicable standards should be done according to an automated schedule instead of relying on manual processes. These parameters should be built into your content services platform to mitigate the risk of human error or lack of oversight.

While not directly related to compliance with the NARA deadline, another way to use automation to improve your business processes is by building workflows into your software. Workflows move



documents from one step to another automatically, reducing the amount of email and manual document handling. This helps you reduce processing time and safeguard against errors.

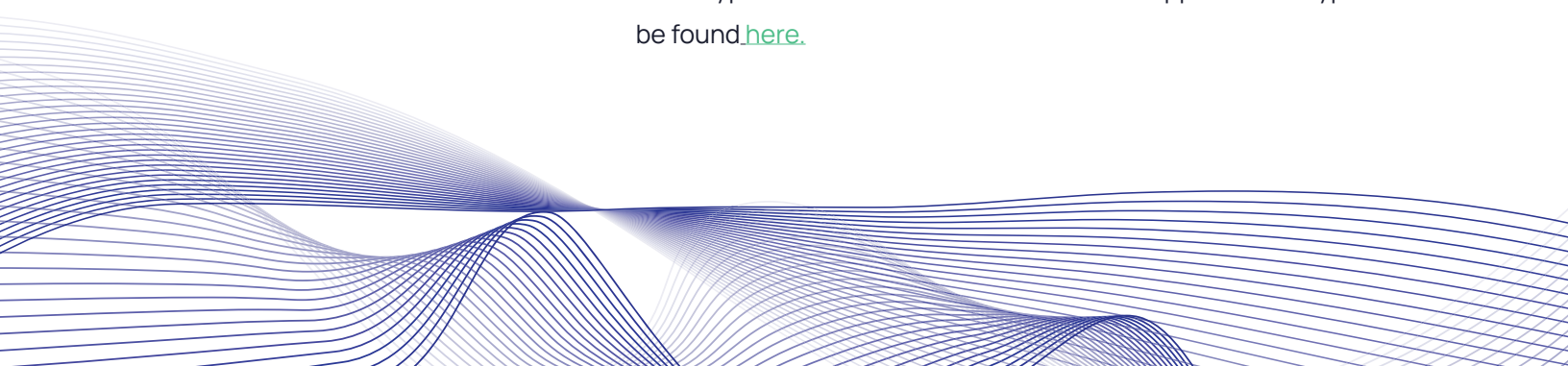
Advanced data management capabilities can automate and streamline the records disposition process. While some software systems only allow for a basic folder structure with metadata fields, a CSP like Q-Action can associate documents with employees, stakeholders, specific business transactions, or any other criteria you specify. This allows retention to be configured for multiple related documents at one level. For example, HR documents for a specific employee can be configured simultaneously so they will all be disposed of according to the proper schedule. This saves your records administrators from having to configure disposition schedules for each document individually and brings you peace of mind that nothing will be missed.

Organization and Transfer

If you currently have on-premise storage of paper files, you will need to either digitize them or move them to commercial storage facilities. There are regulations that still require hard copies of some records, so if you are subject to those requirements, you'll need to outsource your storage. A service provider who provides [integrated services for both electronic and physical document storage](#) (like QFlow Systems) can work with you to ensure that your paper documents are indexed and easily accessible.

Permanent records must be assigned metadata terms to make them searchable. These terms have been adapted from the Dublin Core Metadata Initiative (DCMI), which identifies [15 high-level properties](#) used to describe records.

Finally, documents must be saved in a file format that is accepted by NARA before they can be transferred. For textual data, PDF format is widely accepted, but there is an exhaustive list of accepted file types for all types of content. The full list of NARA-approved file types can be found [here](#).



NARA's Universal Electronic Records Management (ERM) Requirements: What Are They?

The NARA requirements are organized into two priority levels: mandatory (“must have”) and preferred (“should have”), and are listed according to the six components of the records management lifecycle. The prioritization of these requirements helps organizations determine where to focus their resources to bring their programs and systems into compliance.

Program requirements refer to the design and implementation of an agency's ERM policies and procedures, while system requirements provide technical guidance to vendors in creating ERM tools and specifications for agencies to consider when procuring them.

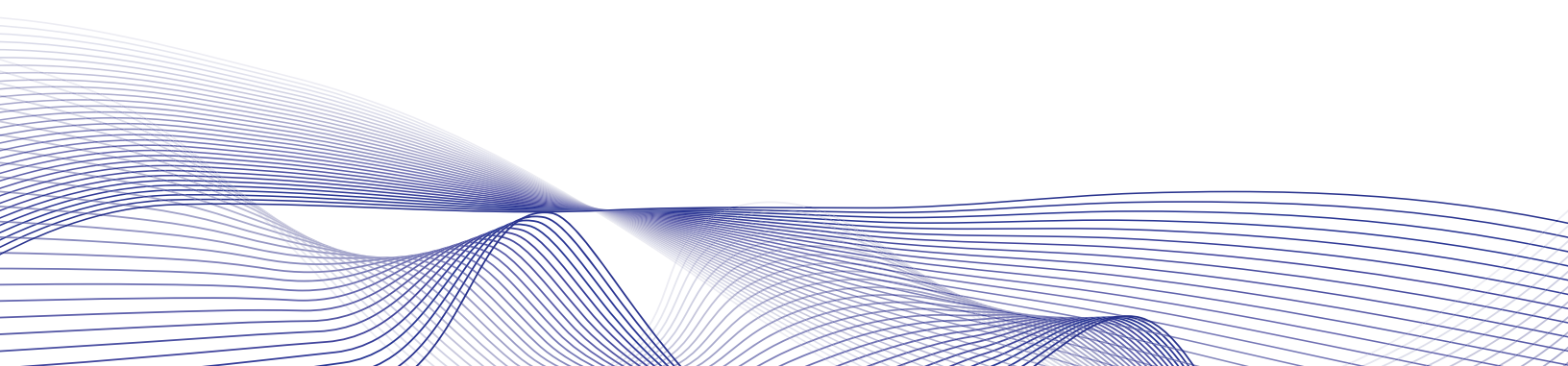
The Records Lifecycle: **Six Stages**

Capture

Capture refers to placing a document under records management control for disposition and access purposes. Objects are not necessarily moved from their original location when they are captured; the term simply refers to when the object is placed under control, regardless of its origin. Records can be imported from other sources, manually entered into the system, or linked to other repositories.

Maintenance & Use

Maintenance and use refers to the process of managing records through their most active stage. This includes ensuring records are migrated and transformed as systems change so they remain usable. Digital preservation is especially important for permanent records that will eventually be transferred to NARA.



Disposal

Disposal is the process of destroying records according to their disposition schedule. Records that meet these conditions are destroyed in accordance with their records retention schedule and using approved methods. Electronic records scheduled for destruction must be disposed of in a manner that ensures the protection of any sensitive, proprietary, or national security-related information.

Transfer

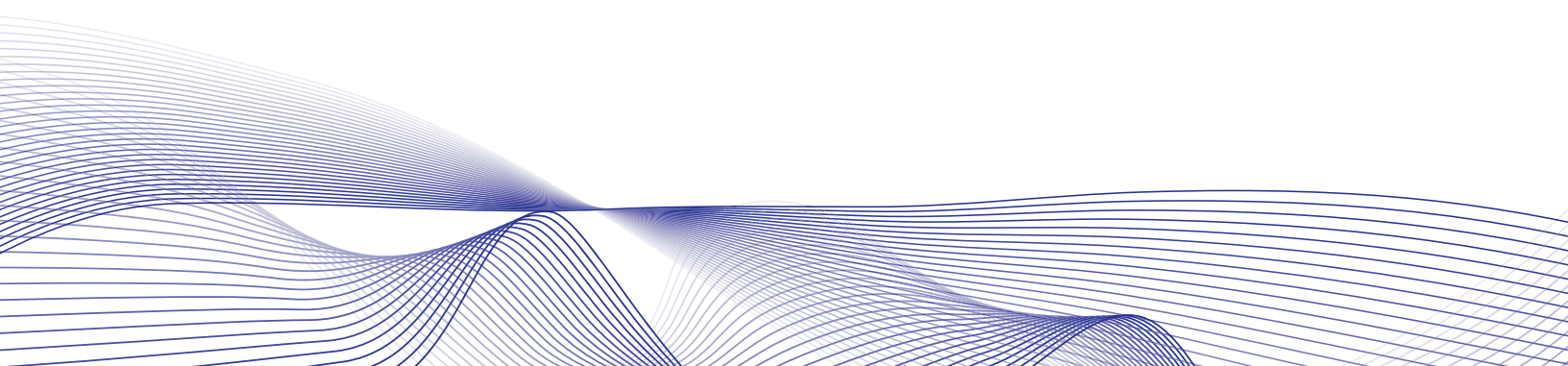
Records that have been scheduled as permanent to the National Archives must be transferred to NARA according to their schedule. This includes records that have been scheduled as permanent, records that are designated as permanent in a GRS; and, when appropriate, records that are being added to a group of records that has already been transferred to NARA.

Metadata

Metadata are elements of information that answer the questions “who, what, where, when, and why” regarding electronic records. Metadata elements provide information that describes the structure and content of electronic records. Metadata elements also provide contextual information that explains how electronic records were created, used, managed, and maintained prior to their transfer to NARA, and how they are related to other records. This information enables NARA to appropriately manage, preserve, and provide access to electronic records for as long as they are needed.

Reporting

Reports may include search results, records eligible for disposition, audit logs, and other customized or ad hoc reports. You can find a complete list of NARA requirements [here](#).



Your Document Repository: Which Storage Style is Right for You?

There are three approaches to securing your document repository: on-premise, cloud, or hybrid. Each has its advantages, but choosing which is right for you depends on your situation.



On-Premise

- Secure your documents without a big migration
- Does not require FedRAMP authorization; greater selection of solution providers
- Fast path to NARA compliance
- Prevent employees from accessing documents from home or elsewhere

Cloud

- Provide access for your employees to documents if they are working remotely
- Less control over data security
- Potentially high data egress charges and other hard-to-understand fees
- Scalable storage
- Requires FedRAMP authorization for solution providers

Hybrid

- Separate critical workloads from less sensitive workloads
- On-premise data center and cloud can be tied together under the same data management
- You can connect existing systems running on traditional architectures that might not be suited for the public cloud

Features and Benefits of the Best Records Management Solutions

Faster collaboration. When employees are not spending their time hunting for documents or reconciling different versions of documents, they are able to collaborate more quickly and get work done more efficiently.

Reduced storage space needed. Having a single version of your documents takes up less space, and the number of redundant copies of documents is reduced dramatically.

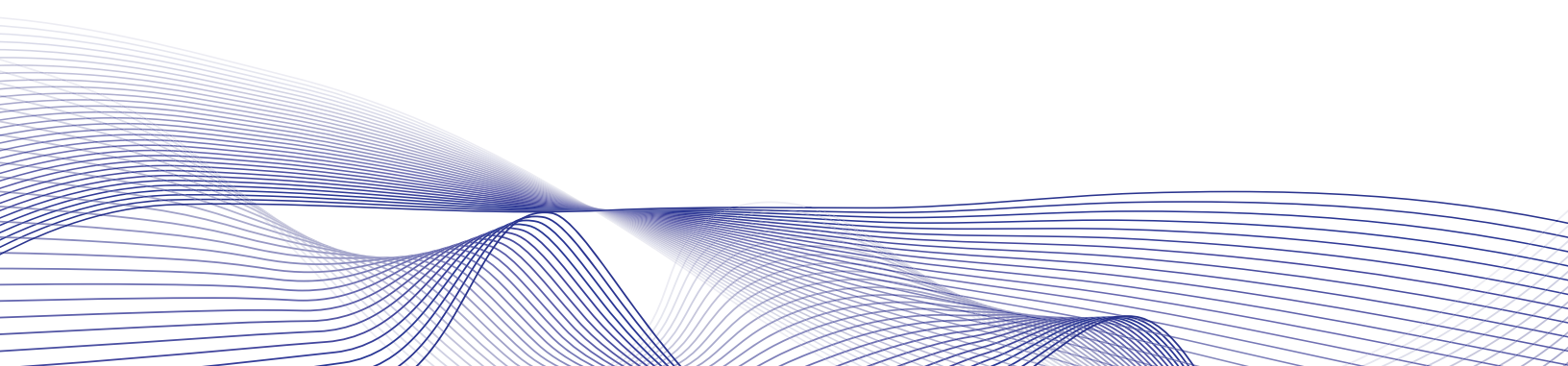
Better security. Documents are held in a single, secure location with access controlled carefully. This prevents data leaks and unsecured information.

Better compliance. Having centralized control and secure locations for documents also makes it that much easier to meet compliance standards, [such as HIPAA](#) or SOX.

Decreased time spent searching for information. Tagging documents properly with meta-data and indexing those documents cuts down search time.

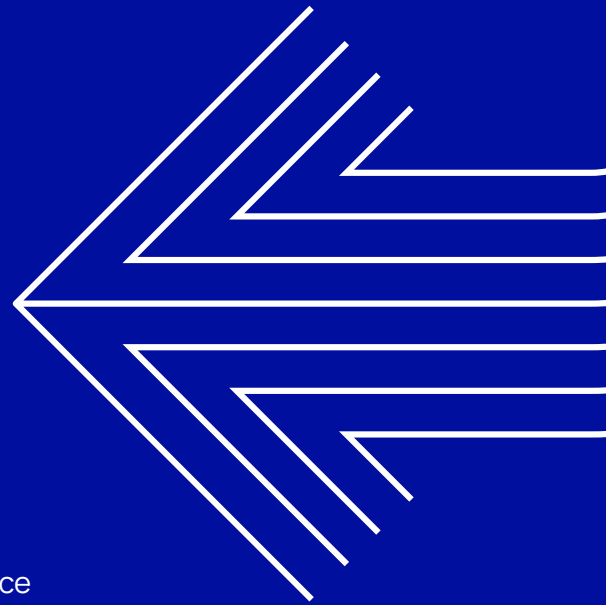
Simplified backup and file recovery. When all documents exist in a controlled virtual space, it is easier to automate backup and retrieval procedures.

The ability to scale. One of the major benefits of document management software is its ability to scale up and down to meet the organization's changing needs. Having a centralized repository makes it more efficient and scalable.



What to Look for in Records Management Software

Again, not all document repositories are built the same. They are designed with different uses and goals in mind. Those that are designed explicitly as part of an enterprise content management system or document management solution have the greatest chance of providing the benefits listed above



Here are some key things to look for as you consider the various document management solutions on the market today:

01

Ability to handle paper and electronic documents. Surprisingly, few document management systems can handle both hardcopy and electronic documents at the same time. Yet there are many industries—aerospace, insurance, real estate, government services—where hardcopy paper documents are still necessary. A good document management solution should recognize that repositories can be physical, too.

02

Modern tagging and indexing. The ability to add tags (both manually and automatically) according to defined taxonomies will help keep documents organized and decrease search time. Modern indexing techniques will help strike the right balance between search speed and storage/processing requirements.

03

Sharing and permissions. The repository should give people access only to the documents they need access to, using a tiered permissions schema. For example, someone in sales might have access to their personal notes plus all the documents available to the sales team but should not have access to everything in accounting.

04

Monitoring tools. This goes hand-in-hand with revision history and permissions. Administrators of a document repository should have the ability to see who accessed which documents, and when, in case there is ever a question about versioning or information access.

05

Document edit history (and reversion). A good document storage solution should track when each revision is made, and who made it. It should also allow you to revert back to previous versions, if that is ever deemed necessary—for example, if someone accidentally erases a crucial section, or the team decides to revert back to older language in a document.

06

A solid team behind the technology. A repository, no matter how good, will not achieve your desired aims if it is not implemented correctly. Having a good technical team behind the product not only ensures the best technology but also proper implementation and user training—not to mention a source you can return to when there is a problem or question.

Don't DIY Your NARA Compliance

No matter which approach you choose for digitizing your records, be sure to select a solutions provider that can provide support and guidance throughout your implementation and beyond. If you're looking for a partner, the team is here to help.

We are recognized by the GSA as experts in ERM for on-premise, cloud-based, and hybrid repository solutions, and have been awarded the special item number (SIN) 518210ERM.

Connect with one of our ERM experts to learn more about how we can help you prepare for 2025 and beyond.