# Document Imaging Report

Business Trends on Converting Paper Processes to Electronic Format

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## **QAI PREPS FED AGENCIES FOR M-19-21 COMPLIANCE**

For several years now, the U.S. government has been working to transition toward a greater amount of electronic record keeping. This past June, the U.S. Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA) jointly issued a memorandum designed to regulate that U.S. Federal records "are created, retained and managed in electronic formats" by the end of 2022. That memorandum is known as OMB M-19-21.

"NARA has historically served as a fee-forservice records center for agencies within the Federal government," explained Scott Swidersky, VP of ECM at Konica Minolta Business Solutions and president of Quality Associates, Inc. (QAI) and DocPoint Solutions, two Konica Minolta companies with strong federal practices. "At the very highest level, the federal government is trying to get these agencies to ultimately become paperless. As part of this effort, NARA is saying that after 2022, they are not going to serve as the government's archive in the way these agencies are used to. At that point, NARA will no longer store paper for them and only accept electronic content."

As a document imaging and ECM focused service bureau and systems integrator, QAI has plenty of experience helping government agencies make a transition to electronic documents. To help guide its customer base through this latest initiative, QAI recently hosted an educational seminar in Washington, D.C., that was attended by more than 300 representatives from more than a hundred government agencies. It featured speakers from NARA and some other government agencies, as well as John Mancini, the former president of AIIM, who recently founded a consulting company named Content Results.

"We are developing an approach called a 'NARA Readiness Compliance Program,' said Swidersky. "Along with that we are building a 'Readiness Center' that is designed to be an entire consultative self-assessment plan that takes an agency through a course of trying to determine whether or not they will comply with the new records regulations."



VP of ECM at Konica Minolta Business Solutions, president, QAI and DocPoint Solutions

NARA itself issues an annual records management selfassessment survey for government agencies. The survey includes questions about personnel, practices, programs, training and other resources dedicated to records management. "According to data from NARA, 57% of government agencies currently do not have a clearly defined strategy to move their permanent records created in a hard copy format to a digital format," said Swidersky. "So far, what we've seen is that some agencies are working toward it, but it's been a voluntary, unfunded initiative.

"We were blown away by the number of attendees at our event. Attendees were there primarily to get answers to two questions: what they need to do and how they should go about doing it."

Swidersky sees three main areas of opportunities for QAI and DocPoint related to M-19-21:

**Consulting:** "There is a need to hold the hands of these agencies along the path of going through an assessment to determine how they will or won't comply."

**Gap-filling:** "After that assessment, they need to determine what needs to be done to get closer to fulfilling their requirements for compliance with NARA's changes."

Conversion Projects: "We see a lot of opportunities for conversion projects coming out of this, and QAI has a long outstanding history of doing conversion work not only to reduce the amount of space agencies are using for storage and to improve access to documents—but also along the lines of complying with the goals of M-19-21, which is ultimately to try and create a digital government."

Swidersky summed up what he views as the goal of the NARA initiative. "The idea is to reduce the burden of paper that agencies have been producing and to make all those documents electronic," he said. "Agencies need to come up with a plan to stop printing documents and start submitting them to NARA electronically. This means they could either be scanned or created as firstgeneration electronic documents.

"Because we've been around the industry and performing the types of services we have been, to us it's like second nature. But, if you are not doing scanning and document management all the time, and given the scale of some of these agencies and the number of locations and employees they have, as well as the strict procedures they need to follow regarding distinctions like permanent and non-permanent records, there are a lot of moving parts there to manage on your own."

#### A LOOK AT FADGI

One of those moving parts could be the quality of images being submitted to NARA. At September's **Harvey Spencer Associates** Capture Conference, Markus Most, a senior records analyst at NARA, discussed the challenges that NARA is facing as the federal government moves toward increased

digital record keeping. "Part of our job is to provide guidelines to government agencies on how to maintain records and how long to hold them," Most said. "One thing we do is help agencies determine what is a temporary, and what is a permanent, record. Three to five percent of nuclear records, for example, need to be held for the life the republic.

"In addition, we offer a service to agencies similar to what Iron Mountain does. We have 50 facilities storing 30 million cubic feet of paper, including all the presidential libraries from Herbert Hoover on. The challenge is that people now want digital access to this information, and we have to come up with a strategy for providing that."

Along these lines, NARA has been participating in the Federal Agencies Digital Guidelines Initiative (FADGI), which was launched in 2007 and last issued updated guidelines in 2016. FADGI is designed "to articulate common sustainable practices and guidelines for digitized and born digital historical, archival and cultural content." "FADGI is a set of technical guidelines designed primarily for digital cultural and heritage materials," said Most. "It's the first time there have been concrete, measurable targets that agencies can hit. It includes not just quality management, although that is a big part of it, but business process measurables as well."

FADGI incorporates a star system to rate image quality:

- A one-star rating "should only be considered informational, in that images are not of a sufficient quality to be useful for OCR."
- Two-star images "may or may not be suitable for OCR."
- Three-star images are defined as "a very good professional image capable of serving for almost all uses."
- Four star images "represent the state of the art in image capture and are suitable for almost any use."

"NARA is responsible for coming up with guidelines for the storage of permanent records, and we are using FADGI as a guideline," Most said. "We need feedback, for example, on whether vendors in the capture industry can meet the FADGI three-star guidelines."

Swidersky's opinion is that FADGI represents white space for scanner vendors. "Most scanners do not produce FADGI compliant content," he said. "Some do, but they are fairly limited and I am aware of some vendors attempting to move closer to satisfying the requirements. The bottom line is that the scanner industry may need to change to help government agencies comply with their digital conversion requirements."

Swidersky said he has seen some federal contracts that include FADGI compliance and that he expects this requirement to increase in the future.

#### **CONTINUING EDUCATION**

Swidersky is excited about the opportunities that M-19-21 could create for QAI and its partners. "The initiative has already created a groundswell of excitement in the industry around helping federal agencies become compliant," he said. "We want to become the go-to resource for this. We've gone to Konica Minolta with it, and they are delighted to invest in it. We are currently planning a 2020 live educational seminar series on NARA compliance and readiness. New information is coming out and requirements are changing literally on weekly basis. We are also looking to get partners involved, including many ISVs and hardware vendors that we have worked with for years, as well as some new partners who are ahead of the curve in terms of FedRAMP [cloud security compliance.

"It takes some work to become a thought leader in this space and to stay relevant as one. We think the work we are doing around M-19-21 and NARA compliance will help us maintain our leadership position going forward."

#### For more information:

http://bit.ly/M-19-21; http://bit.ly/QAlmicrosite; http://bit.ly/FADGIreferencedoc; https://www.archives.gov/records-mgmt/resources/self-assessment.html

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