



“10 MUST HAVES”

FOR RECORDS MANAGEMENT MODERNIZATION

Critical requirements for records management in the federal government have changed significantly in the past few years.

M-23-07, issued 12/23/2022, is an update to M-19-21, which established several requirements to move Federal agencies to a fully electronic environment. Due to delays in the electronic records transition process during the COVID-19 pandemic, M-23-07 extended the original M-19-21 deadlines by 18 months and reaffirmed the underlying goal of the transition to electronic records.

In addition, in June 2023, NARA issued the final regulations governing the digitization of permanent records (36 CFR 1236 Subpart E, Regulations for Digitizing Permanent Records). These rules have fundamental implications for the process of digitizing records and differ from current practice in the following ways:

- Validation
- Planning & Documentation
- Quality Assurance
- Technical Specifications
- Metadata

A key objective tied to both of these initiatives is a shift in the role that records management and records managers play in federal agencies. It is no longer possible to have a records management approach that intends to deal with records “someday.” Instead, a modern records strategy requires that records management become a core business process. The following ten “must haves”—based on data gathered annually by NARA—provide a framework for how government agencies and private sector organizations can rethink their approach to records and archives.

All data is drawn from the *Federal Agency Records Management—2022 Annual Report*. The entire report is well worth a read for anyone interested in RM trends within the federal government.

1. **Regular records management (RM) program audits, evaluations, and frequent updating and validation of vital records inventory.**
2. **Clear metrics and performance measures to validate RM effectiveness.**
3. **Quick response and clear accountability for Freedom of Information Act (FOIA) requests.**
4. **Integrated internal controls to ensure electronic records’ reliability, authenticity, integrity, usability and preservation throughout its lifecycle.**
5. **An identified digitization strategy to convert permanent records created in hard copy or other analog formats to digital format.**
6. **Integrated management of electronic records regardless of storage location (on-prem and cloud).**
7. **Automated systems for capturing, assigning necessary metadata, and classifying electronic information as it is created or enters the organization.**
8. **Incorporation of automated records management functionality into all electronic information systems.**
9. **Documented and approved procedures to enable the migration of records and associated metadata to new storage media or formats as technology changes.**
10. **Documented and approved policies and systems for the eventual transfer of all electronic records to the National Archives and Records Administration (NARA).**

1 Regular records management (RM) program audits, evaluations, and frequent updating and validation of vital records inventory.

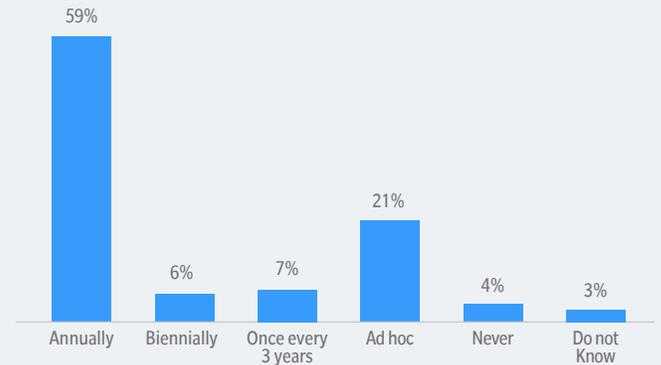
Regular records management (RM) program audits, evaluations and frequent updating, and validation of vital records inventory are essential to a records management strategy because they help to ensure that:

- Records are created, stored, and disposed of by organizational policies and procedures.
- Records are accessible and usable when needed.
- Records are protected from unauthorized access, use, disclosure, disruption, modification, or destruction.
- Records are retained for the appropriate time and then disposed of securely.

Specifically, regular audits and evaluations can help identify areas where records management practices are ineffective and need improvement. Frequent updating of the vital records inventory helps ensure that all essential records are identified and adequately managed. And validation of the critical records inventory can help to ensure that the records are still needed and that the current retention schedule is accurate.

ONLY 67% OF AGENCIES UPDATE THEIR VITAL RECORDS INVENTORY AT LEAST EVERY TWO YEARS.

Q51. How often does your agency review and update its vital records inventory? (36 CFR 1223.14)



2 Clear metrics and performance measures to validate RM effectiveness.

Clear metrics and performance measures are essential in validating the effectiveness of your records management system because they provide a way to measure the success of your records management program. Without clear metrics, it isn't easy to know whether your records management program is effective.

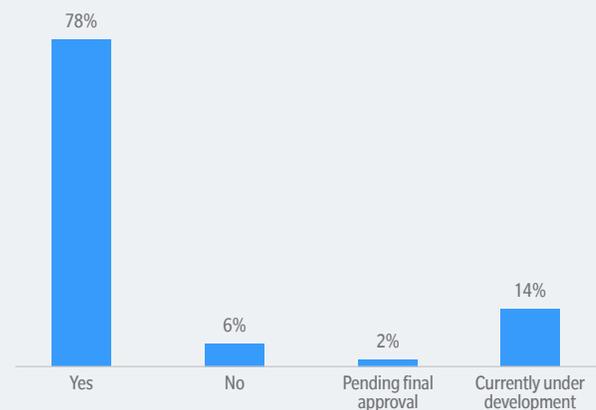
Some examples of clear metrics and performance measures that can be used to validate the effectiveness of your records management system include:

- The number of records that are created, stored, and disposed of in accordance with organizational policies and procedures.
- The number of records that are accessible and usable when needed.
- The number of records that are protected from unauthorized access, use, disclosure, disruption, modification, or destruction.
- The number of records that are retained for the appropriate amount of time and then disposed of securely.

By tracking these metrics, you can see how well your records management system works and identify areas where organizations can improve. In addition to tracking metrics, conducting regular audits and evaluations of your records management system is also essential. This will help you identify any potential problems and ensure that your system meets your needs.

22% OF AGENCIES LACK CORE METRICS FOR THEIR RECORDS MANAGEMENT PROGRAMS.

Q10. Has your agency's records management program identified performance measures for records management activities such as training, records scheduling, permanent records transfers, etc.? (36 CFR 1222.26(e) and OMB Circulars A-123 and A-130)



3 Quick response and clear accountability for Freedom of Information Act (FOIA) requests.

A modern records management system can increase the responsiveness of federal agencies to Freedom of Information Act (FOIA) requests in several ways.

First, a modern records management system can help agencies to identify and locate records more quickly, because modern records management systems are typically electronic, which makes it easier to search and retrieve documents.

Second, a modern records management system can help agencies track FOIA requests' status, allowing agencies to track when requests are received, processed, and responded to.

Third, a modern records management system can help agencies to comply with FOIA regulations, avoiding potential legal problems.

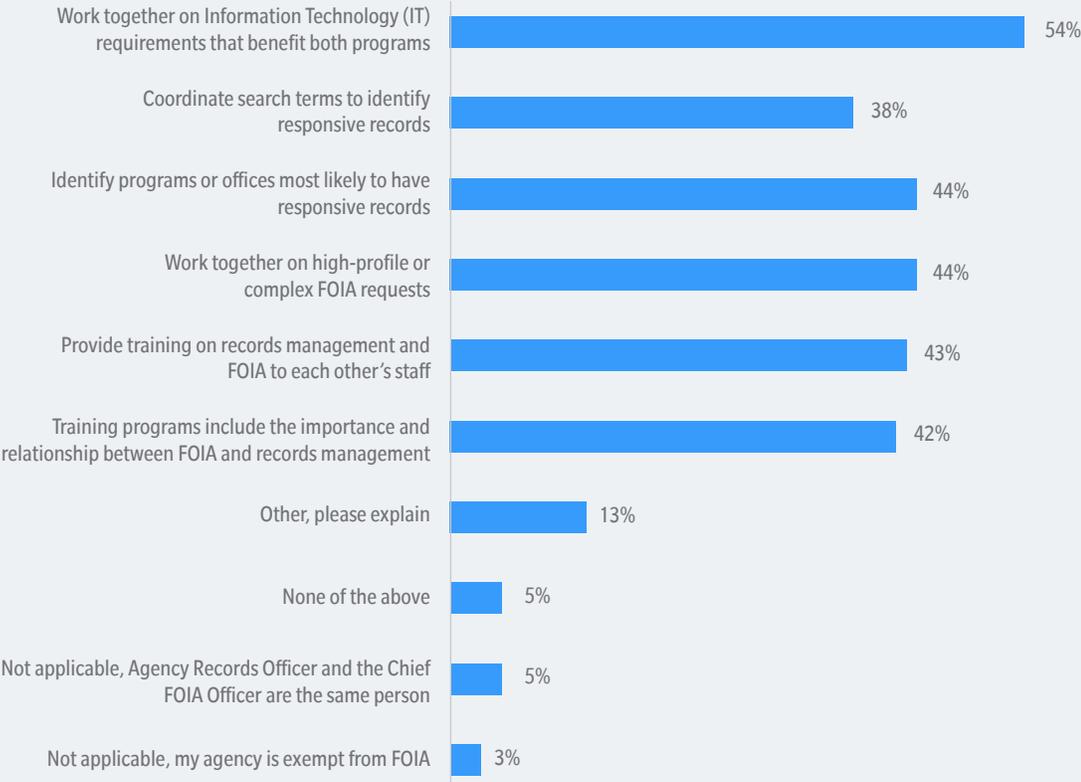
Overall, a modern records management system can be a valuable tool for federal agencies trying to comply with FOIA. By helping agencies to identify, locate, track, and manage records, a modern records management system can help agencies to respond to FOIA requests more quickly and efficiently.

In addition to the above, a modern records management system can also help to:

- Improve the accuracy and completeness of records.
- Reduce the risk of records being lost or destroyed.
- Make it easier to share records with other agencies and the public.
- Save money on storage and retrieval costs.
- Increase employee productivity.
- Improve compliance with government regulations.

LITTLE CONSISTENCY IN APPROACH TO LINKING RECORDS AND FOIA OFFICIALS.

Q57. Which of the following describes the working relationship between the Agency Records Officer and the Chief FOIA Officer? (Choose all that apply)



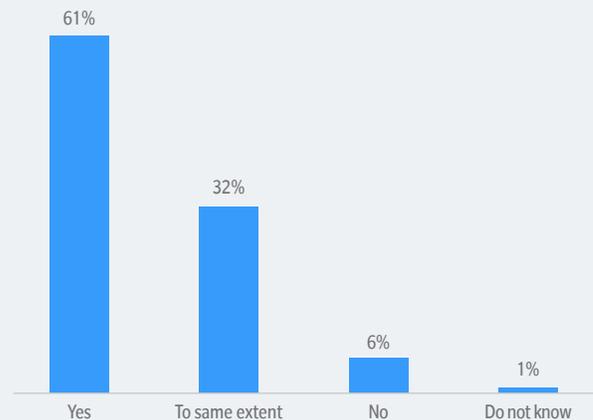
4 Integrated internal controls to ensure electronic records' reliability, authenticity, integrity, usability and preservation throughout its lifecycle.

Six Signs That Core Information Governance Controls are Lacking (Source: *AIIM Certified Information Professional Study Guide*):

1. Organizations keep information beyond its usefulness to the organization, increasing costs and potential legal liabilities and can significantly increase the risks associated with a data breach or other information loss or disclosure.
2. Responses to inquiries take too long: from a customer service perspective, from an internal operational perspective, and even in terms of responses to legal or regulatory requests.
3. The organization stores too much redundant, obsolete and trivial information, including things like personal files, a folder called "1999 Forecasts," a folder called "Bill's Files," and so forth.
4. There is significant uncertainty as to whether a particular document is the correct, most up-to-date, or just a copy.
5. There is information or information-related systems that seem to have no specific owner – or in some cases, multiple owners such that nobody takes responsibility for it.
6. Using personal devices—flash drives, smart phones, personal email—to access corporate systems is uncontrolled or ungoverned.

39% OF AGENCIES FAIL TO MANAGE RECORDS THROUGH THEIR LIFECYCLE.

Q64. Are records and information in your agency managed throughout the lifecycle [creation/capture, classification, maintenance, retention, and disposition] by being properly identified, classified using a taxonomy, inventoried, and scheduled? (36 CFR 1222.34, 36 CFR 1224.10, and 36 CFR 1225.12)



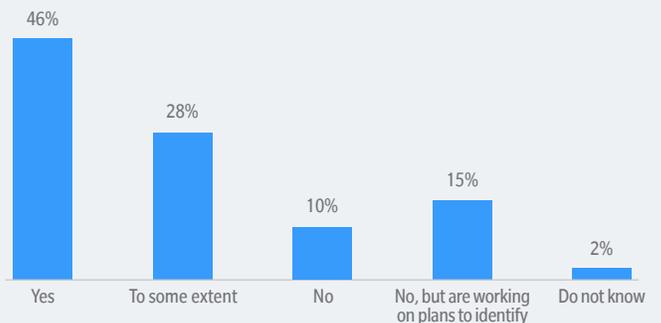
5 An identified digitization strategy to convert permanent records created in hard copy or other analog formats to digital format.

Digitizing permanent records can be a complex and time-consuming process. Still, it can be a valuable investment that can help improve records management and ensure their long-term preservation. An identified digitization strategy is essential because it can help to:

- Improve the accessibility and usability of records by making them available in a digital format that can be easily searched and retrieved.
- Reduce the risk of records being lost or damaged by converting them to a digital format less susceptible to physical damage.
- Save space by eliminating the need to store physical records.
- Comply with legal and regulatory requirements that may require records to be maintained digitally.

CONFUSION ABOUT REQUIREMENTS FOR DIGITIZATION OF PERMANENT RECORDS WILL GET WORSE WITH NEW REGULATIONS.

Q39. In preparation for the publication of the upcoming regulation with standards for digitizing permanent records, has your agency identified permanent series that will need to be digitized?



6 Integrated management of electronic records regardless of storage location (on-prem and cloud).

It is essential to manage both on-premise and cloud-based electronic records because:

- On-premise records are stored in a physical location under the organization's control, important to accessing information quickly or that requires a high level of security.
- Cloud-based records are stored remotely, often in a data center that a third-party provider manages. This can benefit organizations that need to save space or want to access their records from anywhere in the world.

A well-managed electronic records management system can help organizations to:

- Improve the accuracy and completeness of records.
- Reduce the risk of records being lost or destroyed.
- Make it easier to share records with other agencies and the public.

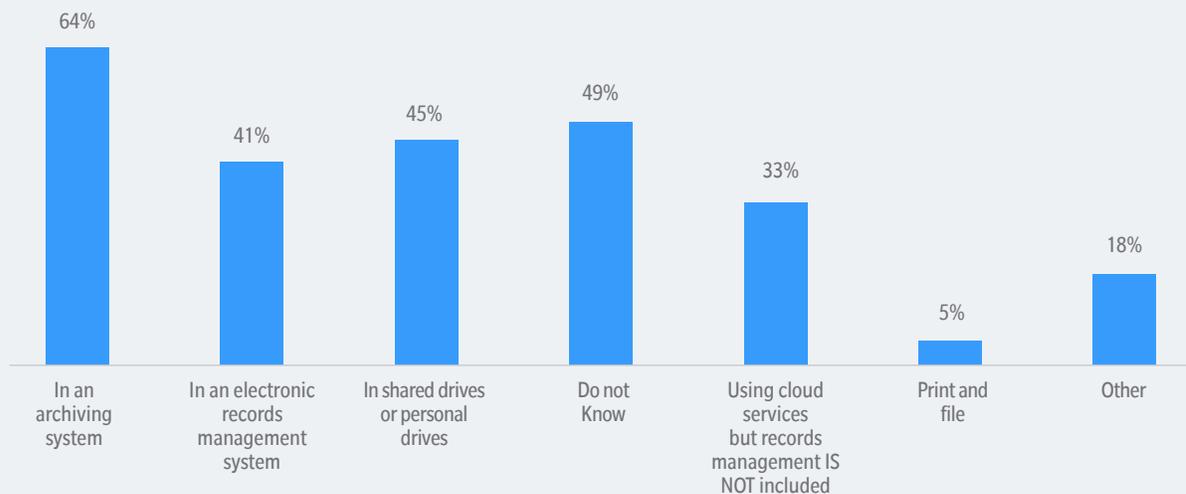
- Save money on storage and retrieval costs.
- Increase employee productivity.
- Improve compliance with government regulations.

When managing both on-premise and cloud-based electronic records, it is important to have a comprehensive records management plan in place. This plan should address the following issues:

- How will records be created, captured, and stored?
- How will records be classified and indexed?
- How will records be secured?
- How will records be accessed and used?
- How will records be disposed of?

RECORDS... RECORDS... EVERYWHERE.

Q45. What method(s) does your agency employ to capture and manage email and other electronic records? (Choose all that apply)



7 Automated systems for capturing, assigning necessary metadata, and classifying electronic information as it is created or enters the organization.

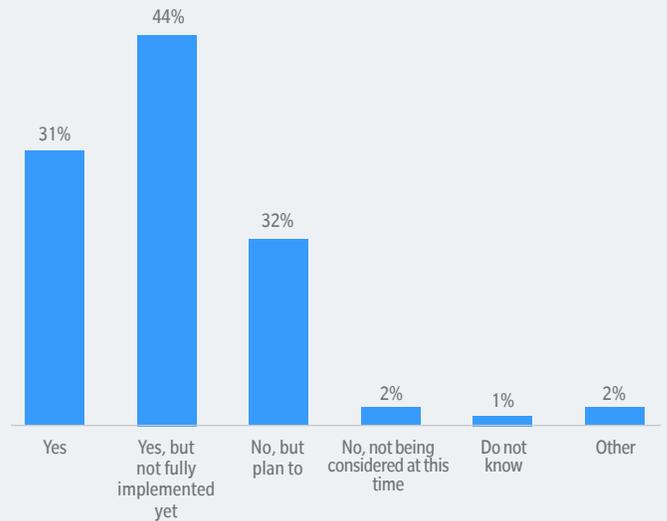
Metadata is data about data. It can be used to describe, organize, and manage information. The benefits of capturing and assigning metadata to documents can be significant when created or entered by an organization. By taking this step, organizations can improve the accuracy, completeness, retrieval, security, and compliance of their information:

- **Accuracy and completeness:** Metadata can ensure that documents are accurate and complete by providing information about their creation, author, and content.
- **Retrieval:** Metadata can make it easier to find documents by providing keywords and other search terms.
- **Security:** Metadata can be used to control access to documents by specifying who can view, edit, or print them.
- **Compliance:** Metadata can help organizations to comply with regulations by providing information about the retention and disposition of documents.

There are several ways to capture and assign metadata to documents. One standard method is to use a metadata schema, a set of rules defining the types of metadata that can be captured and how they should be stored. Another approach is to use a metadata management tool, which can automate capturing and assigning metadata.

METADATA CONSISTENCY STILL A CHALLENGE.

Q36. Has your agency implemented electronic recordkeeping systems to ensure that all permanent records are created/captured, classified, filed, managed and retained with appropriate metadata according to their NARA-approved records schedules? (36 CFR 1220.34(i), 36 CFR 1236.12, 36 CFR 1236.14)



8 Incorporation of automated records management functionality into all electronic information systems.

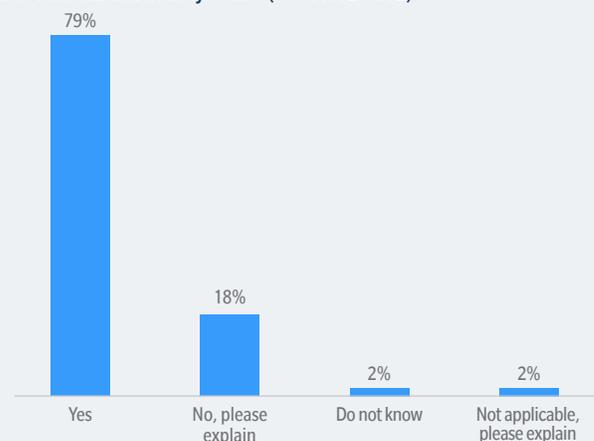
Organizations can more easily implement and maintain a comprehensive records management plan by including automated records management functionality in all electronic information systems, creating significant benefits for the organization, including improved efficiency, reduced costs, and enhanced compliance.

Here are some additional reasons why automated records management is important:

- It helps ensure that records are created, captured, and stored consistently and efficiently.
- It can help to prevent the loss or destruction of records.
- It can make it easier to find and retrieve records when they are needed.
- It helps ensure that records are used in a way that complies with laws and regulations.
- It helps improve the efficiency of business processes.
- It reduces costs associated with recordkeeping.

A LOT OF WORK STILL TO BE DONE ON “DESIGNING IN” RECORDS FUNCTIONALITY INTO OTHER SYSTEMS.

Q54. Does your agency ensure that records management functionality, including the capture, retrieval, and retention of records according to agency business needs and NARA-approved records schedules, is incorporated into the design, development, and implementation of its electronic information systems? (36 CFR 1236.12)



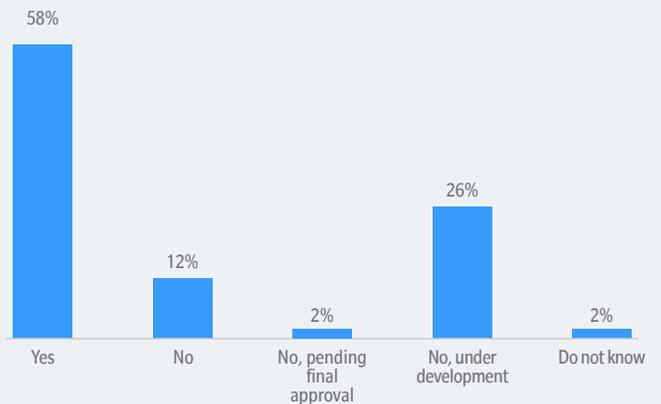
9 Documented and approved procedures to enable the migration of records and associated metadata to new storage media or formats as technology changes.

The overarching rule in future-proofing critical agency information is to understand exactly what information you have, where, and how it is used. Specifically,

- 1. What file formats are used for your records?** Format obsolescence arises because, like storage media, many file formats quickly fall out of fashion, and worse yet, those that do not are superseded by new versions. Standardized archival formats like PDF/A should be considered for files that need to be retained for significant periods.
- 2. To the best of your knowledge, how will the mix of file formats change?** Format obsolescence arises because, like storage media, many file formats quickly fall out of fashion, and worse yet, those that do not are superseded by new versions. And the more proprietary or complex the file formats, the more challenges they present to long-term access. Wherever possible, organizations should use standardized file formats; if those do not meet their needs, they should look at formats with significant market share as they are more likely to be supported over time.
- 3. What is the condition of the storage media upon which an organization stores all the records and their backups?** Understand ALL the variable factors involved in long-term information preservation that extend beyond the formal electronic RM system, including servers, disk drives, networks, PCs, viewing/screen hardware, and operating systems.
- 4. Avoid “big-bang” migrations; manage information in place whenever possible.** When undertaking a migration, clearly understand why you are migrating, from where to where. Many migrations involve the movement of office documents from unmanaged media (individual hard drives and departmental and organizational shared drives) to more structured management environments.
- 5. As agencies standardize on M365, it becomes increasingly critical to understand the native governance and compliance capabilities of the M365 platform.** Mainly, because of COVID-driven remote worker needs, most organizations are adopting the M365 platform for knowledge work; only some, though, understand how to automate the governance of this content.

MIGRATION A KEY ISSUE — ESPECIALLY WITH RISING M365 ADOPTION.

Q55. Does your agency have documented and approved procedures to enable the migration of records and associated metadata to new storage media or formats so that records are retrievable and usable as long as needed to conduct agency business and to meet NARA-approved dispositions? (36 CFR 1236.20(b)(6))



10 Documented and approved policies and systems for the eventual transfer of all electronic records to the National Archives and Records Administration (NARA).

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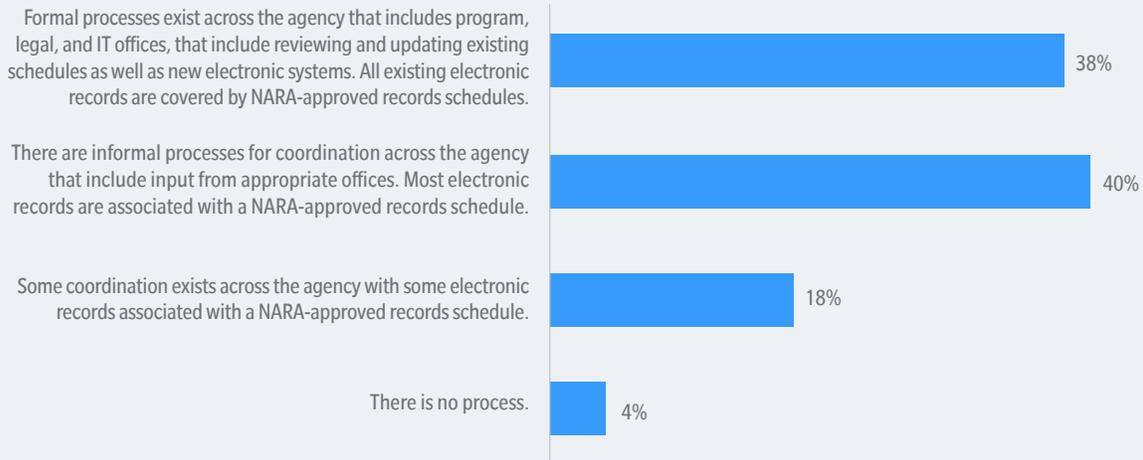
The following are some of the critical policies and systems that NARA has in place for the transfer of electronic records:

- The Electronic Records Management (ERM) Program:** The ERM Program is a comprehensive program that provides guidance and support to federal agencies on managing electronic records. The ERM Program includes several policies and procedures designed to ensure that electronic records are properly created, captured, organized, and disposed of.

- The Electronic Records Archives (ERA):** The ERA is a secure and accessible repository for electronic records. The ERA is designed to preserve electronic records for long-term access and use.
- The Electronic Records Transfer (ERT) Program:** The ERT Program is a program that provides guidance and support to federal agencies on the transfer of electronic records to NARA. The ERT Program includes a number of policies and procedures that are designed to ensure that electronic records are transferred to NARA in a timely and accurate manner.

THE "LAST MILE" — TRANSFER OF PERMANENT RECORDS TO NARA — REMAINS A CHALLENGE.

5.1. Which of the following best describes if your agency has a process to classify records and apply NARA-approved retention schedules in order to properly dispose of electronic records, including the transfer of permanent electronic records to the National Archives?



For more information on NARA’s policies and systems for the transfer of electronic records, please visit the following website: <https://www.archives.gov/records-mgmt/policy/digitization>

