National Archives and Records Administration

Transmittal Memo

DATE: November 18, 2019

TO: All Staff

SUBJECT: NARA 1550, Digitization of Archival Holdings

Purpose: This directive and its supplements establish NARA's policy and procedures to digitize all of NARA's analog holdings, make them accessible to the public online, and preserve them in a sustainable digital format.

This policy:

- Establishes that our policy is to proactively digitize our holdings,
- Supports NARA's Digitization Strategy and Strategic Goals by placing digitization as a core function of archival work alongside, intrinsic to, and equal to appraisal, acquisitions, processing, description, and recognized as a critical component for reference,
- Recognizes that digitization is an archival process and decentralizes authority and responsibility for it throughout the agency,
- Recognizes four main models for digitizing our holdings for access – in-house; partnerships; contracts; and crowdsourcing – and gives guidance and processes for each,
- Establishes technical standards and requirements,
- Confirms and expands existing metadata standards,
- Ensures that digital surrogates and metadata created under NARA 1550 are available in the National Archives Catalog to provide public access and that, for resource and cost efficiency, duplicate copies on NARA's websites must be replaced with copies pulled from the Catalog,
- Gives guidance for short and long-term storage of digital files, and
- Clarifies roles and responsibilities.

Benefits of and objectives for this policy include:

- Increasing public access to NARA holdings,
- Preserving and protecting analog holdings by reducing handling of the originals,
- Ensuring preservation of digitized assets including digital copies and associated metadata through inclusion in the NARA Catalog and storage in ERA 2.0,
- Providing access to those holdings that can no longer be accessed in their original format,
- Supporting the use of digital copies for legal purposes, where appropriate,
- Increasing our archival storage flexibility, and
- Improving customer service by responding to evolving user expectations and with consideration of NARA's available resources.

Background/Significant changes: This directive completely revises NARA's previous digitization policy.

Available forms: None.

Cancelled forms: NA Form 1001, Digitizing Project Proposal Worksheet.

Cancelled policy: NARA 816, Digitizing Activities for Enhanced Access, March 8, 2004.

Effective date: This policy is effective date of signature.

Contact information: For questions on this policy, please contact Pamela Wright, Chief Innovation Officer, on (301) 837-2029 or by email.

DEBRA STEIDEL WALL
Deputy Archivist of the United States

Attachments

SUBJECT: Digitization of Archival Holdings

1550.1 Policy.

a. NARA is committed to digitizing all of our analog archival holdings to help preserve them and make them available online. The digitization of archival holdings is a significant business process that crosses multiple business units. Our policy is to proactively digitize our holdings to enhance public access. Policy objectives include:

(1) Making our digitized material and metadata available on the National Archives Catalog to increase online public access and enable content reuse on other platforms.

(2) Digitizing analog holdings at a standard that should diminish the need to repeat digitization of holdings.

(3) Preserving content in a digital copy, digitized to Federal Agencies Digital Guidelines Initiative (FADGI) 3-star standards, at minimum, described in "Technical Guidelines for Digitizing Cultural Heritage Materials," as established in NARA 1550.

(4) Ensuring preservation of digital copies and associated metadata through storage in ERA 2.0.

(5) Allowing for digitized materials that may be eligible to be certified by NARA as admissible as evidence to take the place of original analog holdings, in accordance with federal statutes and NARA regulations, as appropriate.

b. At NARA, digitization of accessioned holdings is defined as the process of converting the information in analog holdings, regardless of format or media type (e.g., paper, audio, film, sound recordings, etc.), into a digital format, providing public access to that content through the National Archives Catalog, and providing storage in ERA 2.0.

c. NARA's agency-wide goal is to make its holdings available in digital format through the Catalog, and policy must align with this goal. Because each digitization project is different, the length of time to upload digitized holdings in the Catalog will vary by project. However, all units must work with the Office of Innovation to make all unrestricted digitized records and materials available through the Catalog in a timely manner.

d. Once digital copies are available in the Catalog, the Office that created the digital assets (e.g., Research Services, Office of Innovation, Legislative Archives, and Presidential Libraries) must develop and implement a plan to replace existing copies on NARA websites with links to or content from the Catalog.

e. Content that is digitized for use in a physical exhibition (including Presidential Library museum exhibits), for an online or on-site digital exhibition, or as part of an Office's ongoing social media strategy must be added to the Catalog at the item-level. Item-level cataloging of such content should be addressed in exhibition planning and social media planning.

f. All digitization must adhere to the appropriate digitization and technical metadata standards established by NARA and included in approved Office annual digitization plans. Digitization plans must outline how the digitized materials will be used and which standards will be employed for each project.

(1) All NARA digitization projects must be consistent with NARA policies for digitizing holdings and adhere to the FADGI 3-star guidelines for digitization specifications and technical metadata standards, at minimum, unless exceptions are approved as part of an Office annual digitization plan. Digitization of textual materials and still images should follow NARA 1550, Supplement 3, Digitization Process for Internal Digitization Projects.

(2) Exceptions:

(a) Offices, custodial units, and non-custodial units currently following or seeking to follow standards other than FADGI 3-star for textual materials and still photographs digitization must provide a rationale as part of their Office annual digitization plan and have the decision approved by the Office Digitization Liaison.

(b) Audio, Audiovisual, Film, and Video digitization should follow preferred standards currently available on Archives.gov.

g. All descriptive metadata for digitization must adhere to NARA's Lifecycle Data Requirements Guide.

1550.2 Scope and Applicability.

a. This directive covers digitization of all analog accessioned holdings and donated materials.

b. The activities associated with digitization are:

(1) Planning and tracking digitization projects,

(2) Prioritizing digitization projects according to established criteria,

(3) Ensuring that locating, pulling, and refiling of holdings for digitization comply with NARA handling requirements,

(4) Preparing documents, as necessary, to include screening and access review and any needed preservation tasks,

(5) Capturing/creating basic technical and descriptive metadata for retrieval and management of the digital copies and to provide basic contextual information for the user,

(6) Digitizing to approved FADGI 3-star or other approved standard,

(7) Conducting quality control of digital copies and metadata,

(8) Making the digitized records available for public access in the National Archives Catalog, and

(9) Storing digital files, with their National Archives Identifier (NAID) and associated metadata, into ERA 2.0.

b. This policy does not apply to the digitization carried out by Federal agencies, by the Federal Records Center Program as a reimbursable service when records remain in the other agency's legal custody, or to NARA's operational records.

c. Offices responsible for digitizing content in response to FOIA requests for inclusion in an online FOIA Reading Room must follow NARA 1550, Supplement 3, Digitization Process for Internal Digitization Projects, for digitization specifications and work with their Office Executive and the Digitization Liaison to ensure that digitization plans submitted for approval include reference to FOIA Reading Room requirements and/or any other special requirements related to public release.

d. This policy does not cover the creation of digital images of museum artifacts and other three-dimensional objects.

1550.3 Responsibilities.

In addition to the authorities delegated in NARA 101, NARA Organization and Delegation of Authority, the following responsibilities are assigned in order to effectively implement this policy.

a. Chief Innovation Officer:

(1) Coordinates NARA's digitization program.

(2) Serves as NARA's liaison to digitization partners.

(3) Drafts and coordinates all partner agreements and partner digitization project plans, and ensures all approvals are received from appropriate offices.

(4) Coordinates online posting of all digitization partnership agreements and coordinates public comments on partner agreements, when required.

(5) The Chief Innovation Officer (CINO) signs all partnership project plans and partnership agreements.

(6) Supports agency-wide planning and tracking of all digitization efforts for digitized copies of archival materials.

(7) Receives and reviews metadata associated with digital objects for the Catalog.

(8) Posts final versions of metadata and digital objects in the Catalog.

(9) Coordinates with Information Services to establish approved digitization equipment and software lists.

(10) Ensures closure of digitization partnership agreements and/or project plans, when needed.

(11) Ensures that NARA's Digitization Partnership Strategy, Principles for Partnerships, and digitization policy are reviewed and updated on a regular basis with appropriate internal and external stakeholders.

(12) Chairs and manages the Digitization Governance Board.

b. Chief Operating Officer (COO):

(1) Reviews and approves all digitization partnership agreements and partner project plans for Research Services and Legislative Archives, Presidential Libraries, and Museum Services. Contacts the Office of Innovation to address concerns surfaced with agreements and/or partner project plans.

(2) Approves the temporary removal of holdings from NARA facilities for offsite digitization on a case-by-case basis.

c. Executive for Research Services:

(1) Oversees Research Services' digitization program.

(2) Ensures that all units comply with digitization policy.

(3) Consults with Preservation Programs as needed to address preservation problems or questions.

(4) Provides final decision for the digitization of holdings within the Office.

(5) Approves Research Services' digitization partnership agreements prior to Chief Operating Officer (COO), Chief Financial Officer (CFO), Office of General Counsel (NGC), Chief Innovation Officer (CINO), and the Archivist of the United States' (the Archivist) review and approval.

(6) Approves Research Services' partner project plans prior to COO and CINO review and approval.

(7) Oversees the work of the Office Digitization Liaison.

d. Director, Preservation Programs:

(1) Recommends equipment and provides appropriate records handling training in support of digitization activities.

(2) Reviews the condition of records selected for digitization projects on an as requested basis.

e. Executive for Legislative Archives, Presidential Libraries and Museum Services:

(1) Oversees Legislative Archives, Presidential Libraries, and Museum Services' digitization program.

(2) Ensures that all units comply with digitization policy.

(3) Consults with Preservation Programs on a project-by-project basis and as needed.

(4) Provides final decision for the digitization of holdings within the Office.

(5) Approves Legislative Archives, Presidential Libraries and Museum Services' digitization partnership agreements prior to COO, CFO, NGC, CINO, and the Archivist's review and approval.

(6) Approves Legislative Archives, Presidential Libraries and Museum Services' partner project plans prior to COO and CINO review and approval.

(7) Oversees the work of the Office Digitization Liaison.

f. Office Digitization Liaison (appointed by Executive):

(1) Ensures that a signed project plan is in place for all of their Office's partnership digitization projects.

(2) Works with the Office of Innovation in coordinating and reporting statistics for all Office digitization projects, including partnerships, in-house, contractor and crowdsourced digitization.

(3) Coordinates with the Office of Innovation on Office and partner digitization projects to ensure digital copies and appropriate metadata are provided in the Catalog.

(4) Works with the Office of Innovation and the Office of General Counsel on partnership and contract issues that arise during partner projects.

(5) Ensures that all digitization projects across the Office comply with digitization policy and submits approved Office annual digitization plans to Digitization Governance Board.

g. Office units, including custodial units and non-custodial units such as exhibits and education units:

(1) Develop, submit, and, once approved by Office Executive, implement digitization project plans.

(2) Develop and maintain project SOPs in compliance with digitization policy.

(3) Custodial units must track the standards used for digitization so that it will always be possible to determine the primary purpose for which the holdings were digitized (e.g., for access, preservation, or to allow them to be certified/authenticated in lieu of the original analog holdings).

(4) Ensure that locally held preservation digital copies are deleted once digital copies are uploaded to the National Archives Catalog and ingested into ERA 2.0 for preservation.

h. Digitization Governance Board, in order to facilitate an effective, efficient, and data-driven enterprise-wide digitization approach:

(1) Conducts systematic review of digitization policy and strategy.

(2) Oversees and coordinates NARA's annual digitization plans including receipt of all approved Office annual digitization plans submitted by Office Executives.

(3) Coordinates with Information Services to facilitate management and integration of new technologies for large-scale digitization at NARA.

(4) Establishes community of practice across NARA to foster and improve the subject matter expertise on scanning and digitization.

(5) Coordinates with the Digital Preservation Working Group, the Electronic Records Division, and other groups and units, as needed, on issues related to digital content lifecycle management.

i. Office of the General Counsel:

(1) Reviews and provides recommendations on memorandums of understanding and digitization partnership agreements, and partner project plans as requested.

(2) Provides recommendations regarding privacy.

(3) Provides recommendations regarding authentication, certification, verification, and/or admissibility of digital copies, and other legal issues regarding NARA's digitization efforts.

j. The Archivist of the United States reviews and provides final signature approval on select digitization partnership agreements as described in the NARA Principles for Partnerships to Digitize Archival Materials (see NARA 1550, Supplement 4).

k. Chief Financial Officer reviews digitization partnership agreements to ensure appropriate disclosures of Public Private Partnership Agreements in the annual financial statements.

1550.4 Methods for Digitizing Archival Holdings.

NARA pursues digitization through a variety of methods:

a. In-house. NARA staff play an important role in NARA's digitization efforts and digitization will be integrated into the responsibilities of archival units nationwide.

(1) Functions that fall under digitization include, but are not limited to: systematic digitization by custodial units and digitizing labs; preservation reformatting; reference and reproduction order fulfillment, including Freedom of Information Act (FOIA) requests; exhibit development; social media and educational activities; and any other activity that results in a digital copy of archival holdings. Digital copies resulting from these functions must be added to the Catalog and stored in ERA 2.0.

(2) NARA encourages innovation in digitization to increase efficiencies, improve public engagement with our holdings, and enhance access. Staff with ideas for new types of digitization projects with staff, partners, or the public should contact their Executive or Office Digitization Liaison.

b. Partnerships. NARA works with private, public, non-profit, academic, and other government institutions to digitize our holdings. Given the breadth and complexity of our holdings, we will continue to be flexible and open to a variety of partnership arrangements.

(1) The Office of Innovation acts as NARA's liaison for all digitization partnerships. Staff who would like to propose a partnership should contact their Office Digitization Liaison who will work with the Office of Innovation to coordinate the effort. If the staff member works for an Office that does not have a Digitization Liaison, contact the Office of Innovation directly.

(2) Most digitization partnership agreements require review by NGC and the approval of the CINO, CFO, and COO. All approved partnership agreements must be published on NARA's main website, Archives.gov. All digitization partnerships must adhere to NARA Principles for Partnerships to Digitize Archival Materials. (See NARA 1550, Supplement 4).

(a) Digitization partnership agreements that meet all of the criteria below must be posted for a public comment period and signed by the Archivist, after CINO approval:

(i) Last more than 90 days,

(ii) Provide the partner exclusive use of the digitized copies and/or a commercial benefit, and

(iii) Require support from NARA staff that is beyond what would be normally expected in providing public access to the same holdings in one of NARA's public research rooms.

(b) Small, one-time digitization projects that are expected to last fewer than 90 days and that involve an individual or a non-commercial partner may be approved at the CINO and the Office Executive level.

(3) Once a partnership is in place, there will be project plans covering discrete bodies of holdings. These project plans are drafted in coordination with the Office of Innovation and the applicable Office Executive.

c. Contractors. NARA may contract for digitization services. Contracts must follow all of NARA's relevant digitization policies and standards. All proposed contracts must be approved by the Office Executive. Proposed contracts will be reviewed, awarded, and managed by the Office of the Chief Acquisition Officer and relevant staff within the proposing Office following NARA procedures for contracts.

d. Crowdsourcing. NARA works collaboratively with the public to create digital copies, scanned at standards established in this policy, in an innovative and efficient way to get more of our holdings digitized (for example, members of the public scan records in the Innovation Hub at the National Archives building in Washington, DC). NARA will continue to explore ways to expand this and similar crowdsourcing efforts throughout the agency. (See NARA 1550, Supplement 1, Digitization Process for Projects to be Completed by Citizen Archivist Scanners.)

1550.5 Planning Digitization Projects.

a. Digitization projects may be undertaken by both custodial and non-custodial units within an Office. The Office Executive will set annual work plan targets for units within the Office based on staffing, equipment, space, and technical capabilities. Custodial units must follow their Office procedures for proposing digitization projects. Non-custodial units should follow the procedures outlined in NARA 1550, Supplement 2, Digitization Process for Exhibit, Education, and Social Media Projects. Coordination among Offices will be facilitated through the Office Digitization Liaison.

b. Prioritizing Digitization Projects.

(1) Offices should consider the following issues when identifying and selecting the holdings to determine their priority for digitization.

(a) **Public demand:** Are the holdings in question highly requested?

(b) **Significance:** Are the holdings of high significance or historical value? Are they Specially Protected Holdings?

(c) **Restrictions:** Are there access or use restrictions in these holdings that might preclude the records from being physically or digitally

available to the public? Have these holdings been reviewed or requested under FOIA? See paragraph 1550.7 "Assessing Access Status When Planning Digitization Projects" for more information.

(d) **Processing status:** Have the holdings been processed?

(e) **Media type:** In what media are the original holdings? Can the custodial unit complete digitization of special media? If not, does the relevant special media lab have the necessary equipment to digitize that media type? Does NARA or a partner have the necessary equipment/technology to effectively digitize that media type?

(f) **Partnership:** Is there a potential partner to digitize these holdings?

(g) **Preservation of the original holdings:**

(i) Are the original holdings at risk due to physical handling and/or physical deterioration making digitization advisable to prevent information loss?

(ii) Are the original holdings at risk due to hardware/software/ format obsolescence?

(iii) What are the risks and preservation needs that should be addressed to prepare these holdings for digitization, i.e. allow for safe handling and complete image capture of the original holdings?

(h) **Records location:** Where are the holdings located? If the holdings are to be digitized in-house, does the facility have appropriate space and equipment? Is it possible to have a partner or vendor conduct digitization on-site? For offsite digitizing, consider whether transfer of the materials would incur unacceptably higher costs or significantly increased risks of damage or loss to the holdings that might be avoided in-house.

(i) **Legal requirements:** Are the originals used for legal purposes that require certification?

(j) **Available resources that are appropriate to the project:** Is Office-approved equipment available to use in digitizing the holdings? Are staff trained in handling the holdings?

1550.6 Preparing Records for Digitization.

a. Preservation of Original Holdings. Holdings to be digitized should be evaluated, as needed, for potential preservation risks that are directly tied to the proposed digitization methods. These risks must be beyond the normal risks associated with serving the same holdings in a Research Room. Preservation Programs staff will advise and assist the Offices to address specific risks and recommend actions to be taken prior to and during digitization. Office Executives make (or may delegate the making of) final decisions concerning the requirements for preparing and handling holdings as part of the digitization project.

b. Access Restrictions. Holdings to be digitized must be evaluated for information subject to access restrictions of all types. All digitization projects must incorporate and follow procedures to prevent the unauthorized disclosure of information subject to access restrictions. See paragraph 1550.7 "Assessing Access Status When Planning Digitization Projects" for more information.

c. Pulling, Handling, and Refiling of Holdings to be Digitized. NARA staff, volunteers, partners, and contract employees must adhere to the guidance provided in NARA 1550 Supplements 1, 2, and 3, and any specific guidelines or instructions provided in digitization project plans, including NARA directives concerning holdings protection and the safe handling and transportation of holdings. This includes correct handling of holdings for return to original enclosures after digitization.

1550.7 Assessing Access Status When Planning Digitization Projects.

a. Offices should assess their holdings using NARA 1601, Screening Federal Records for Information Covered by FOIA Exemptions, including, "Screening Guidelines for Record Series That Are Likely to Contain Some National Security-Classified or Other Exempted Information." If the files would be withheld from release in analog form due to access restrictions, their candidacy for digitization should be assessed based on the ability to prevent release of that sensitive information. Files with sensitive information can be candidates for digitization if the sensitive information can be redacted prior to release.

b. Offices should also assess the records for other restrictions, including but not limited to, copyright/intellectual property restrictions, donor-imposed restrictions, or partnership restrictions (e.g., embargo) that may have an impact on the public release of digitized content.

c. Personally Identifiable Information (PII). Refer to NARA 1601, Screening Federal Records for Information Covered by FOIA Exemptions.

1550.8 Quality Control of Digital Copies and Metadata.

Quality control of digital copies and metadata is the responsibility of the Office that is digitizing the records. Partnership agreements and contracts must include provisions to ensure quality control. Each Office must perform quality control and metadata compliance review before sending digital copies and metadata to the Office of Innovation. See NARA 1550, Supplements 1, 2, and 3 for more details.

1550.9 Storing Digital Copies.

a. Once digital copies of analog holdings are available in the National Archives Catalog and ingested into ERA 2.0 with their NAID, the Office that conducted the digitization must delete the files from local storage, including shared drives, hard drives, area networks, and other non-cloud storage. Short-term storage arrangements must be included in approved Digitization Plans.

b. Offices may maintain digital copies of holdings created under Digitization Plans in short-term local storage (NARA Information Services approved shared drives, external hard drives, area networks, local servers, or cloud services) until digital copies are successfully uploaded to the National Archives Catalog cloud storage and ingested into ERA 2.0 for long-term storage and digital preservation.

c. Offices may create working copies of digitized records and keep them short-term in local storage to facilitate digitization-on-demand or for limited use to conduct conservation, exhibition, education, or social media programs or to facilitate posting to the online FOIA Reading Room.

1550.10 Authorities.

a. 44 U.S.C. § 2109, Preservation, arrangement, duplication, exhibition of records. Authorizes the Archivist to provide for the preservation, duplication, and reproduction of records.

b. 44 U.S.C. § 2114, Preservation of audio and visual records. Authorizes the Archivist to make and preserve audio and visual records, including motion-picture films, still photographs, and sound recordings, in analog, digital, or any other form.

c. 44 U.S.C. § 2116(a), Legal status of reproductions. Authorizes the Archivist to establish standards to make digital reproductions of records that have the same legal status of originals.

d. 44 U.S.C. § 3312, Digitized copies of records considered as originals; certified reproductions admissible in evidence. Establishes that digitized copies, when made in compliance with regulations under section 3302, shall have the same effect as the originals and shall be treated as originals for the purpose of their admissibility in evidence.

1550.11 Public Release.

Unlimited. This directive is approved for public release.

1550.12 Records Management.

Records created during the process of digitizing archival holdings are covered by GRS 5.2, Transitory and Intermediary Records, Item 020, Intermediary Records. Partnership agreements, are, at the time of publication of this directive, unscheduled. Refer to Corporate Records Management's "Records Paragraphs in NARA Policy Directives" web page for updates on the development of appropriate disposition instructions for these records.