

2017 Plain Writing Report Example – Criteria Report - Before

**Month XX, 2017**

Memorandum for: Senior Agency Officials for Records Management

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Subject: Criteria for Managing Permanent Electronic Records in Compliance with the *Managing Government Records Directive* (M-12-18)

The Office of Management and Budget (OMB) and National Archives and Records Administration's (NARA) Managing Government Records Directive (M-12-18) continues to drive records management reform. Since the release of this Directive, I have been pleased to see the progress agencies have been making towards meeting the requirements.

NARA remains committed to supporting agencies as they work towards successfully meeting the final Directive target, which is 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.

The successful management of all electronic records will continue to be a Government-wide challenge as new technologies emerge. It is important to work with your agency's leadership head, records officers, and NARA to ensure your agency can effectively manage both permanent and temporary electronic records as we move towards a purely digital Government.

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Archivist of the United States



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# Criteria for Managing Permanent Electronic Records in Compliance with the Managing Government Records Directive (M-12-18)

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National Archives and Records Administration

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# Background

The Managing Government Records Directive 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 applies to permanent electronic records wherever they reside.

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 in IT systems, storage devices or drives, social media, text messaging applications, encrypted messaging applications, collaborative spaces, desktop productivity applications, or anywhere else.



Figure 1. Locations for Electronic Records

This success criteria synthesizes existing records management regulations and guidance to help agencies evaluate their progress towards meeting the 2019 Directive target. It provides agencies the following guidance for managing permanent electronic records:

1. A high-level view of success in the areas of *policies, systems, access, and disposition*. These elements are useful in developing a strategic approach;
2. A seven-step process describing an “how to” or operational path to success; and
3. The [Universal Electronic Records Management \(ERM\) Requirements](#) which serve as a starting point when designing or procuring systems or services to ensure compliance with applicable statutes, policies, and regulations.

This success criteria is intended to apply to permanent records that are created and maintained electronically. Electronic business processes should be implemented to support digitally born permanent electronic records to the fullest extent possible. Agencies should make every effort to eliminate paper and move towards electronic records management to support a modern and efficient government.

Agencies should use this guidance to identify and address gaps in existing agency records management program practices. Some requirements may be applicable to temporary records in addition to permanent records.

# Success Criteria

## High-Level View of Success

To successfully manage permanent electronic records agencies must have effective *policies* and *systems*, the ability to *access* and use the records, and the ability to execute *disposition*.

*Policies* and training programs must explain staff responsibilities for managing all electronic records. The policies and training must instruct staff on how to distinguish among permanent records, temporary records, and material that does not meet the definition of a Federal record.

*Systems* and business processes support automated management of electronic records in accordance with all applicable requirements.

*Access* to records requires system controls to effectively manage and preserve permanent electronic records in all formats. Electronic records must be protected against unauthorized access, use, alteration, alienation, or deletion; and are searchable, retrievable, and usable for the period specified in their records schedule.

*Disposition* requirements for electronic records must be implemented by agency systems and policies must support transfer of permanent electronic records to NARA as specified in a NARA-approved records schedule.

## Path to Success - Operational View

Agencies need to determine their path to success using the criteria listed under each step below. This section outlines “how to” steps agencies should take towards successfully managing permanent electronic records electronically by the Directive’s 2019 target. The steps NARA identified are:

1. Institute Policies
2. Provide Training
3. Identify Permanent Electronic Records
4. Impose Management and System Controls
5. Prepare for Migration and Transfer
6. Conduct Agency Self-Evaluations
7. Accession Records

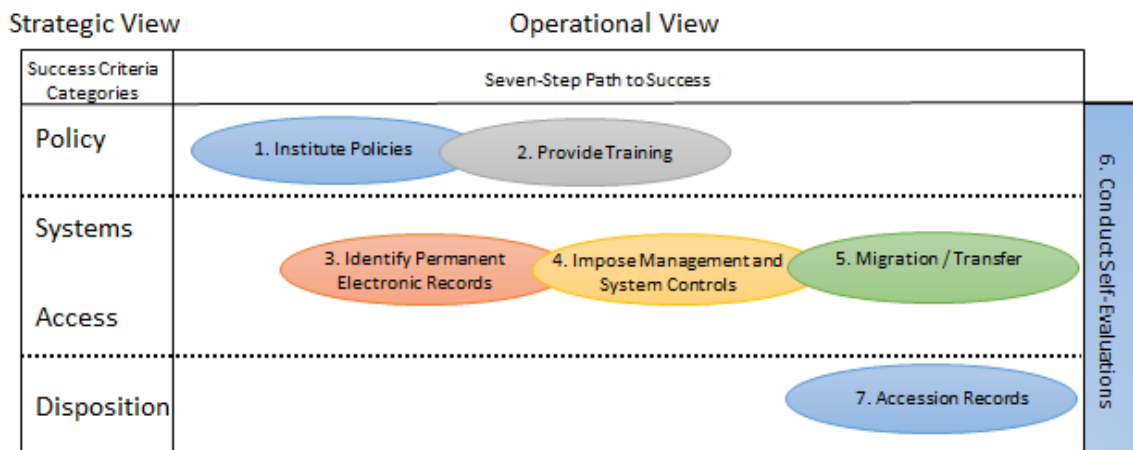


Figure 2. High Level View Crosswalk with Operational View

Figure 2. crosswalks high-level and operational views of managing permanent electronic records electronically. Combined with the Universal ERM Requirements, agencies have the basic information needed to appropriately manage permanent electronic records in an digital environment.

The activities described in the seven-step path to success are iterative and should be conducted routinely. The order of these steps and number of times they are repeated depends on the maturity of 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.

### Step 1. Institute Policies

Agencies must review records management policies to ensure they cover permanent electronic records sufficiently. Agencies are successful by ensuring policies address:

- Regular review, monitoring, and evaluation of agency records schedules to determine if changes in technology or business processes would alter retention or disposition instructions;
- Implementation of procedures for records scheduling, managing, and transferring permanent electronic records to NARA;
- Use of digital signatures to support the creation and management of permanent electronic records;
- Notification and reporting procedures for unauthorized access, use, alteration, alienation, or deletion of electronic records;
- Procedures for managing legal holds electronically;
- Institution of records management self-evaluation programs that track overall performance and specifically monitor the management and transfer of permanent electronic records to NARA;
- Compliance with agency classified and controlled unclassified information requirements;
- Media storage of permanent electronic records;

- Incorporation of records management into the agency information resources management strategic plans;
- Integration of records management into IT systems design and development; and
- The 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.

## Step 2. Provide Training

Managing permanent electronic records presents challenges that cannot be met without an agency-wide understanding of records management responsibilities. Providing training on records management is a crucial step in the path to success. Agencies are successful by ensuring:

- Records management programs have sufficient budgetary and personnel resources to administer training;
- Records management program staff are adequately trained to effectively perform the duties as described in OPM occupational series 0308, Records and Information Management;
- Designated agency records officers have obtained NARA's Federal Records Management Training certificate within one year of assuming the position; and
- All agency personnel complete records management training as described in NARA Bulletin 2017-01, Agency Records Management Training Requirements.

## Step 3. Identify Permanent Electronic Records

The Managing Government Records Directive included a 2013 target requiring agencies to ensure permanent records existing for more than 30 years were identified for transfer and reported to NARA. The Directive's 2013 target further required agencies to work with NARA to identify unscheduled records. Building from that effort, which primarily pertained to paper records, agencies must take the additional step in accounting for unscheduled permanent electronic records. Agencies are successful in this task by ensuring records management staff:

- Review and verify the list of the unscheduled records identified in the 2013 effort;
- Perform a detailed review of the agency specific records schedules and NARA's General Records Schedules to:
  - Identify and take account of records already identified as permanent, and
  - Determine if agency schedules fully cover electronic records and to make updates in ERA if necessary;
- Consult with program offices to:
  - Confirm the owners of the permanent electronic records identified during the records schedules review and the list of unscheduled records from the 2013 effort, and
  - Account for systems containing permanent electronic records, and) to determine if a records series have become obsolete;
- Reconcile the list of permanent electronic records series identified during the records schedule review with the agency assigned appraisal archivist to identify obsolete and unscheduled permanent electronic records; and

- Consult with their assigned appraisal archivist to ensure all unscheduled records and IT systems have been appraised and associated with an NARA-approved records schedule.

#### Step 4. Impose Management and System Controls

Agency systems must have the functionality to manage and impose controls on systems that create, store, or manage electronic records. Records management, FOIA, IT, business offices, and other stakeholders must collaborate to determine the appropriate controls needed to adequately manage and preserve permanent electronic records at an enterprise level. System controls can be described as the activity whereby authorized users and system administrators enable or select system functions to ensure permanent electronic records are managed as required by agency policy and NARA-approved records schedules. Agencies successfully manage and preserve permanent electronic records electronically by ensuring:

- NARA's Universal ERM Requirements are considered when developing and updating systems;
- Systems allow for the access of permanent electronic records wherever they reside, including records stored on personal hard drives, personal network drives, email personal storage table (.pst) files, and individual cloud storage spaces;
- Systems allow access to permanent electronic records of current and separated employees as long as needed to conduct agency business;
- Systems and controls protect permanent electronic records against unauthorized destruction, modification, deletion, or alienation;
- Systems maintain the content, context, and structure of permanent electronic records including NARA-required metadata;
- Systems impose the appropriate level of information access and security for classified and controlled unclassified records;
- Agency records management staff are consulted throughout the entire Systems Development Life Cycle and Capital Planning and Investment Control processes;
- Systems have the ability to audit and monitor the use of permanent electronic records;
- Manual or automated controls are in place to disable passwords or other forms of file-level encryption before transferring to NARA as they may prevent access to records;
- Public, private, or community cloud environments have system controls in place to manage electronic records;
- Consultation with Chief Data Officers, Chief Technology Officers, and IT enterprise architecture staff to leverage any data maps maintained to identify systems containing permanent electronic records; and
- Systems are configured to capture and preserve Capstone official's email records as outlined in General Records Schedule 6.1: Email Managed under a Capstone Approach and NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records;

#### Step 5. Prepare for Migration and Transfer

Agencies are responsible for the management of permanent electronic records until they are transferred to NARA's legal possession. Permanent electronic records usually become eligible for transfer when they are between 15 to 25 years old. As a result, there should be sufficient

planning to ensure permanent electronic records are migrated from decommissioned systems into succeeding systems. Agencies are successful by:

- Complying with format guidance outlined in NARA Bulletin 2014-04: Revised Format Guidance for the Transfer of Permanent Electronic Records;
- Complying with metadata requirements for agencies seeking to transfer permanent electronic records to NARA as outlined in NARA Bulletin 2015-04: Metadata Guidance for the Transfer of Permanent Electronic Records;
- Migrating permanent electronic records from legacy systems into succeeding systems, ensuring the carryover of metadata when electronic records are migrated;
- Ensuring permanent electronic records can be exported and transferred;
- Ensuring IT system owner processes involve records management staff when planning to retire a system; and
- Maintaining and providing adequate transfer documentation that allows NARA to identify, process, and make available the permanent electronic records.

### Step 6. Conduct Agency Self-Evaluations

Agencies must periodically evaluate their entire records management program. To specifically meet the Directive's target for permanent electronic records, agencies must evaluate their records disposition and transfer processes to identify issues and make improvements where necessary. Agencies should develop an internal process using the risk analysis provided in previous years' RMSA, SAORM, and Federal Email Management reports to target and correct program deficiencies and measure performance in between NARA reporting cycles. Agencies are successful by:

- Implementing policy and system audits to measure compliance with applicable records management statutes, regulations, and guidance;
- Identifying and tracking permanent electronic records eligible or due for transfer to NARA; and
- Developing a method for estimating the volume, in terms of bytes, of permanent electronic records currently being maintained by the agency.

### Step 7. Accession Records

This is the process of transferring legal custody of permanent records from Federal agencies to NARA. Activities within this stage are periodic and are performed within the normal course of records management operations. Transferring permanent electronic records to NARA is the final and most important measure in determining whether or not agencies are successful in meeting the Directives 2019 target. In this step, agencies must:

- Designate authorized users of ERA with the expertise and knowledge to submit unscheduled records for appraisal, as well as update existing agency schedules;
- Ensure authorized users are able to create Transfer Requests in ERA and electronically submit them to NARA for review and approval;
- Implement training for agency staff to remove personal information from electronic records before they are accessioned to NARA.
- Institute systems and processes to remove or delete the following prior to transfer to NARA:



- non-record materials
- listserv and all agency-wide announcements
- trash
- spam
- draft folders
- Utilize consistent or uniform naming conventions for personal storage table (.pst) files, including the record creator's last name, first name, and date range;
- Utilize an arrangement type that may include the organization of records alphabetically by name or subject, geographically, numerically, or chronologically or by unique identifier. Naming conventions should be whatever is functionally acceptable for the agency's business process, yet it must be consistent; and
- Coordinate with NARA for delivery.

Agency staff should contact their records officer for information regarding ERA account access. Details for ERA training are available on NARA's Records Management Training [eLearning website](#).



Figure 3. "How to" Achieve Success

In addition to these steps, 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.

## Universal ERM Requirements

In August 2017, NARA published a set of Universal ERM Requirements for all electronic records. The requirements identify high level business needs for managing electronic records, including those identified as permanent. They are derived from existing NARA regulations, policy, and guidance. They are a starting point for agencies to use when developing system requirements. Records management staff should work with acquisitions and IT personnel to tailor any final system requirements.

Agencies must incorporate these requirements into their programs and systems in order to successfully manage all electronic records. The document contains an abstract, list of lifecycle requirements, list of transfer format requirements, and a glossary. The Universal ERM Requirements are available online at the following link: [www.archives.gov/records-mgmt/policy/universalERMrequirements](http://www.archives.gov/records-mgmt/policy/universalERMrequirements).

The requirements are 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 priorities.

NARA will be supporting these requirements going forward and will be updating them for changes in technologies, regulations, and guidance products.

## Next Steps

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. For many agencies, full implementation of the success criteria for electronic records management is an ongoing process that continues beyond 2019.

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 make informed decisions and document them appropriately.

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](mailto:PRMD@nara.gov)

## Contacts for More 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](mailto: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.

### 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.