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Overview of NARA's Digitization Regulations for Temporary and Permanent Records

May 23, 2024

GSA Industry Day Webinar

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- Digitization webpage

- Permanent and temporary records

- Digitization regulation vs FADGI

- Quality Management Guide

- Verification vs validation

- Agency/NARA responsibilities

- Exceptions process

- Digitization Success Criteria White Paper

- Q&A

Digitization Webpage

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https://www.archives.gov/records-mgmt/policy/digitization

Digitization of Federal Records

Federal agencies are moving toward an electronic government. A digitization program will be part of many agencies' efforts to transition towards fully electronic government. This webpage is a resource for agencies that provides quick access to digitization resources.

Contact rmstandards@nara.gov with any questions about this page and NARA's digitization guidance.

Digitizing Temporary Records

36 CFR 1236 Subpart D, Regulations on Digitizing Temporary Records

FAQ about Digitizing Temporary Records

Digitizing Permanent Records

36 CFR 1236 Subpart E, Regulations for Digitizing Permanent Records

Success Criteria for Digitizing Permanent Records

FAQ about Non-Compliant Permanent Digitized Records

Digitization Guidance

General Records Schedule 4.5: Digitizing Records

FAQ about General Records Schedule 4.5

Digitization Resources

Digitization Quality Management Guide
FADGI 2022 Guidelines
OpenDICE

Transfer of Electronic Records

36 CFR 1236 Subpart F, Transfer Metadata

Format Table

Accessioning Guidance and Policy

Finding Aid Requirements

Electronic Records Accessioning Support Tools

Webinar on Preparing Transfer Requests in

Digitization Services

GSA's Document Conversion Services Special Item Number (SIN)

36 CFR Subpart D –– Digitizing Temporary Federal Records

- 1236.30 Requirements for digitizing temporary records

- 1236.32 Digitization standards

- 1236.34 Validating digitization

- 1236.36 Disposing of original source records

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Digitization Standards for Permanent Records

36 CFR Subpart E -- Digitizing Permanent Federal Records

- 1236.40 Scope of this subpart
- 1236.41 Definitions for this subpart
- 1236.42 Records management requirements
- 1236.44 Documenting digitization projects
- 1236.46 Quality management requirements
- 1236.48 File format requirements

- 1236.50 Digitization requirements for permanent paper and photographic prints
- 1236.52 Digitization requirements for permanent mixed-media files
- 1236.54 Metadata requirements
- 1236.56 Validating digitized records and disposition authorities

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NARA Regulations vs FADGI

https://www.digitizationguidelines.gov/guidelines/

- FADGI 3-star is *NOT* the requirement

- Federal Agencies must comply to NARA Regulations found in 36 CFR 1236

- FADGI has good best practices but is not the regulatory authority for compliance

- The minimum requirement equates to FADGI Modern Textual records category

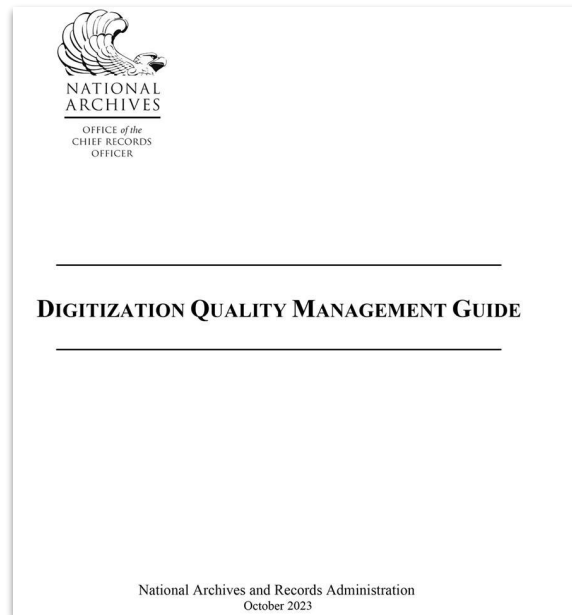- The technical specifications derive from ISO 19264

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Quality Management

- Quality management (QM) is the overall management function and underlying activities that determine quality

- Quality assurance (QA) is a proactive quality management (QM) activity focused on preventing defects.

- A QA program is heavily dependent on quality control (QC) data to search for patterns and trends.

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DIGITIZATION QUALITY MANAGEMENT GUIDE

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National Archives and Records Administration
October 2023

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Verification vs Validation

Verification occurs throughout the digitization process where parameters are checked to ensure that the digital records comply with the the requirements in the regulation.

Validation is the records management process at the end of the process where agencies affirm that their digital records are complete, accurate, comply with the standards in the regulations, and can be used for the same business purposes as the source records.

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Agency/NARA Responsibilities

- **Validation** ([§ 1236.56 Validating digitized records](#))

  - **Agency verifies:**
    - All records identified in the project's scope have been digitized;
    - All required metadata are accurate, complete, and correctly labeled;
    - All image technical attributes have been met;
    - All image files legible and all necessary physical characteristics captured;
    - Mixed-media files are digitized or associated appropriately; and
    - Project documentation has been created.

  - **NARA does not:**
    - Review/certify agency validation
    - Require transfer of digitization documentation

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Exceptions

- Section 2.1 of [M-19-21 Transition to Electronic Records](#)

    - Categories:
        - burdensome to the public
        - cost would exceed the benefit
        - analog records cannot be replaced for some other reason

    - Exceptions will be based on a combination of criteria as part of an overall business case

    - Exception requests
        - considered in the context of an agency's overall RM program
        - analysis of agency records and business needs
        - one request to cover all the records series

- [NARA Bulletin 2020-01 Guidance on OMB/NARA Memorandum Transition to Electronic Records (M-19-21)](#)

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Success Criteria White Paper

- Assists agencies in digitizing permanent records and meeting federal records management requirements in laws, regulations, and NARA-issued policy.

- If not properly managed, digitization can result in incomplete/insufficient digital record quality to serve all of the same business purposes as the originals.

- Helps agencies to adhere to the requirements in 36 CFR 1236 subpart E, and other recordkeeping requirements to help mitigate many of the risks inherent in digitization.

- Provides high-level success criteria for digitizing permanent records, which are organized around four key concepts: *Policies*, *Access*, *Systems*, and *Disposition*.

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Policies
Tracking
Handling
Quality Management
Digitization
Training
Validation

Systems
Intellectual and
Physical Control
Indexing
Equipment Testing
Image Capture
File Naming
Metadata
Storage

Access
Rights
Restrictions
Storage
Monitoring
Audits
Formats

Disposition
Records Schedules
GRS 4.5
Retention Periods
Legal Requirements
Disposal
Transfer Requirements

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What Success Looks Like

Policies:

- Roles and responsibilities

- Procedures for handling source records

- Digitizing source records

- Quality management

- Managing digital records

- Validating digitization processes

- Disposition

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Systems:

Agencies must have systems in place capable of digitizing, managing, accessing, preserving, and transferring permanent records in acceptable digital formats with required metadata.

- Systems for managing source records

- Systems for creating digitized records

- Systems for managing digitized records

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What Success Looks Like

Access

- Records must remain usable and retrievable.
- Access is dependent on agencies establishing and maintaining intellectual and physical control of records throughout their lifecycle to support an agency's ability to carry out its business functions.
- Your agency can provide access to meet internal agency needs and accommodate responses to requests for information.
- Access for source records

- Access for digitized records

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What Success Looks Like

Disposition

- Paper and analog source records

- Digital records

Questions?

Seventh and eighth grade class in Westley, CA school after lesson in geography.
National Archives Identifier: 148741583.

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