



NATIONAL  
ARCHIVES

ARCHIVIST *of the*  
UNITED STATES

DAVID S. FERRIERO

T. 202.357.5900

F. 202.357.5901

*david.ferriero@nara.gov*

02 March 2020

James Grossman  
Executive Director  
American Historical Association  
400 A Street, SE  
Washington, DC 20003

Dear Mr. Grossman,

Thank you for your letter dated January 23, 2020 with concerns raised by the American Historical Association (AHA) about guidance to agencies in the June 28, 2019, Office of Management and Budget (OMB)/NARA memorandum, *Transition to Electronic Records* (M-19-21). You raise two main concerns -- one related to the implementation and oversight of M-19-21 and another broader concern about records appraisal.

Regarding M-19-21, the memorandum establishes that NARA will no longer accept analog records after December 31, 2022 "to the fullest extent possible." While NARA and OMB expect agencies to meet the targets established in the memorandum, we acknowledge that 2022 is fast approaching, and there will be agencies faced with funding and implementation challenges. As such, M-19-21 states that,

NARA will establish a process to issue exceptions to the provisions of this memorandum where replacing analog records with electronic systems would be burdensome to the public, the cost would exceed the benefit, or otherwise should not be replaced for some other reason, including statutory, regulatory, or policy barriers.

Concerns about hasty implementation and incentivizing poor records management practices in agencies may be addressed in limited cases by the exceptions process. As NARA works with agencies on the goals and opportunities offered by M-19-21, we expect agencies to prioritize existing resources and/or request the necessary additional resources from OMB to ensure the targets are successfully met. Through required reporting for agencies and other oversight, we will be monitoring preparedness and compliance as the deadline approaches and will take prudent steps to mitigate risks to records and promote sound records management practices while driving needed change.

NATIONAL ARCHIVES *and*  
RECORDS ADMINISTRATION

700 PENNSYLVANIA AVENUE, NW  
WASHINGTON, DC 20408-0001

*www.archives.gov*

You also raise concerns about the impact that digitization requirements will have on future transfers of permanent records. NARA is developing regulations to address standards for digitizing permanent records that are currently in analog formats with the appropriate metadata to ensure that digitized copies are of sufficient quality to replace the original source records. These regulations will be available for public comment and we will notify you when the comment period is open. In addition, while M-19-21 states that NARA will not accept transfers of paper records into the Archives or into NARA Federal Records Centers (FRC) after December 2022, agencies are not required to digitize permanent records stored in NARA's Federal Records Centers before that date. Our goal is to incentivize agencies to move permanent paper records into FRCs in the next 3 years so we can properly plan for future archives management of the materials.

While NARA does not have formal enforcement authority, NARA does monitor agency compliance with records management laws, regulations, and policies in a variety of ways. In recent years, NARA has increased its capacity to collect data from agencies about recordkeeping practices, and to conduct onsite records management inspections, assessments, and system audits. NARA is committed to increasing its focus on oversight, which will include monitoring and evaluation of agency compliance with the goals of M-19-21.

Regarding the expertise of professional archival and records management staff at the agencies and at NARA, and records appraisal generally, you raise concerns about the future of electronic records management and data science. This is a concern that NARA shares and efforts are underway that address this issue. As stated in M-19-21, there is an action assigned to the Office of Personnel Management (OPM) to revise position classification standards for archival and records management occupational series to incorporate electronic records management responsibilities and functions. Within NARA, consistent with NARA's Strategic Plan, we are also working on an initiative to provide electronic records management training to records management and appraisal staff.

You suggest in your letter that further study into the use of machine-learning algorithms and artificial intelligence for appraisal is needed as well as consideration of the implications such an appraisal methodology might have on records. We currently have no plans of implementing machine-learning appraisal and agree that further study of this topic is needed prior to implementation. We are aware of the trend to use artificial intelligence to manage information and are monitoring the development of the technology and implications for records management.

You also raise concerns about "big bucket" schedules" including concerns that some permanent records will be mis-categorized as temporary and that a lack of series descriptions will make future access extremely difficult for researchers. NARA introduced the big bucket scheduling approach over 15 years ago and we continue to assess the implementation and impact on agencies records management programs. It is our contention that NARA's flexible scheduling policy is an important tool to help agencies ensure that records schedules support effective electronic records management, particularly because the increasing volume of records that must be scheduled cannot be easily accomplished through a granular approach to scheduling. NARA plans to issue updated guidance and best practices to aid agencies in the development of big bucket schedules and their implementation.

Thank you for sharing your concerns. I agree that NARA, OMB, federal agencies, and professional groups, like AHA, all want to work together to advance NARA's mission as well as serve the needs of NARA's stakeholders. You frequently ask what the Association can do to help NARA succeed in our mission to preserve, protect, and provide access to our nation's federal history. I want to thank you for that offer and recommend that you continue to engage with historians and your membership to educate them and the public about NARA, our mission, our challenges, and how we are supporting the transition to electronic records across the federal government. I am available, as is my staff in the Office of the Chief Records Officer, to participate in conferences and meetings where we can continue the discussion of these topics, and further inform your membership on these important issues.

NARA is dedicated to promoting more efficient and effective federal recordkeeping, consistent with the Federal Records Act, and specifically focused on the transition to fully electronic recordkeeping across the government. M-19-21 is a groundbreaking step in this transition to a digital future, in step with the way modern records are created and with the expectations of the public and other stakeholder in accessing their government's records.

I appreciate your willingness to engage with us to help make this vision a reality.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Ferriero", written in a cursive style.

DAVID S. FERRIERO  
Archivist of the United States