



Introduction to the M-19-21 Directive: Transition to Electronic Records

With the final deadline for M-12-18 approaching at the end of 2019, NARA and OMB issued a new directive on June 28, 2019, to sustain the momentum and extend the requirements for agencies in their transformations to electronic RM. This new directive, M-19-21, Transition to Electronic Records, continues the initiatives established in M-12-18 and sets the bar even higher for taking steps to eliminate paper holdings. It consolidates requirements from the prior guidance, rescinding M-12-18, the Presidential Memorandum on Managing Government Records, as well as M-14-16, Guidance on Managing Email.

M-19-21: Transitioning to Electronic Records

The M-19-21 directive now encompasses all Federal records, setting targets to require that by 2022, both permanent and temporary records will be created, retained, and managed in electronic format. Additionally, NARA is officially affirming the 2022 cutoff date to agencies for accepting paper and other analog records into the Federal Records Centers (FRC), a strategic goal first introduced in its 2018 Strategic Plan. Furthermore, M-19-21 directs agencies to close their agency-operated storage facilities for paper and analog records, and transfer their paper holdings to FRCs or commercial storage facilities prior to the 2022 deadline.

There are four targets set for agencies in the new M-19-22 directive:

1. **By 2019, Federal agencies will manage permanent electronic records in electronic format**, restating the final target set by M-12-18.
2. **By 2022, ALL permanent records must be managed electronically with appropriate metadata**, expanding the earlier target to include not only those records created electronically, but all permanent records already existing in paper or analog format.
3. **By 2022, ALL temporary records must be managed in electronic format OR be stored in a commercial records storage facility.**
 - NARA will grant exceptions (process to be determined) to agencies to continue to produce and store records in analog format under certain conditions.
 - Additionally, agencies must close their agency-operated records storage facilities.
4. **Federal agencies will maintain a robust and compliant RM program**, carrying over several programmatic requirements from M-12-18. This includes designation of a Senior Agency Official for Records Management (SAORM) and Agency Records Officer, annual RM training for all personnel, requiring that all records are scheduled, and updating schedules as business transitions to electronic workflows.

Like M-12-18, M-19-21 lays out several steps NARA and OPM will take to assist agencies in meeting the above targets and transitioning to fully electronic RM, including issuing additional guidance on electronic record formats, transfer, and digitization of analog records, as well as updated OPM position classification standards for archives, records, and information management-related job series.

What Does M-19-21 Mean for Federal Agencies?

The expanded scope of the targets set forth in M-19-21 means agencies must now make a significant shift in their program operations to aggressively deal with legacy paper holdings.

Permanent Records: Agencies must digitize all permanent records in analog format (with appropriate metadata) for eventual transfer to NARA if they have not been accessioned to NARA or transferred to an FRC for storage prior to December 21, 2022.

If agencies haven't already identified and scheduled all permanent records, they need to act now to ensure they are positioned to respond to the new directive goals. If necessary, agencies should inventory all permanent records holdings throughout the agency, both analog and electronic.

- They should review their records schedules and determine if any permanent analog records being stored onsite have met the required retention period and can be accessioned directly to NARA. Otherwise, if they are eligible to be transferred to an FRC for storage until the retention period is met for permanent accessioning, they should act to complete those transfers as soon as possible, no later than December 2022.

- If agencies have permanent analog records in their inventory that need to be retained onsite beyond the 2022 deadline, they should begin planning to digitize those records and manage them going forward in NARA-approved formats with required metadata, until they are eligible for accessioning. NARA has indicated that digitization standards for permanent records will be forthcoming in the next year to help agencies ensure the digitized versions meet NARA's archival specification.

Temporary Records: M-12-18 did not impose any specific requirements for agencies on temporary records (other than email records), but M-19-21 does, requiring that all temporary records be managed in electronic format. If agencies want to continue to maintain paper records after December 31, 2022, they must be stored in commercial records storage facilities, not onsite or at NARA-operated FRCs.

Agencies should take steps to assess their temporary records holdings and evaluate options to meet the imposed target, including ramping up current transfer and disposition operations, or incorporating document conversion/digitization capabilities into their programs.

- Agencies that are storing inactive temporary paper records onsite should prepare those records for transfer to FRCs, as soon as possible, before the December 31, 2022 deadline.
- If there are temporary paper records onsite that are nearing or have already met their full retention period, they should take the necessary steps to process those records for destruction in accordance with their disposition procedures as soon as eligible, to reduce their paper holdings.
- Active temporary records in paper format that are needed for ongoing business should be digitized as soon as possible and incorporated into an approved electronic recordkeeping repository to avoid the 2022 deadline altogether.
- Agencies must evaluate digital conversion of legacy temporary records holdings, in whole or in part, based on their agency's needs, taking into consideration the volume, frequency of use, accessibility, retention period, and other criteria.

- Because FRCs will no longer accept paper records transfers after December 31, 2022, agencies that know they will continue to generate and store paper after that date must also assess their needs and arrange for suitable commercial storage options.

Agency-Operated Storage Facilities: M-19-21 introduces this new requirement to close agency-operated records storage facilities, which arguably presents a major challenge for many agencies. Many agencies maintain massive holdings of analog records that have long-term, albeit temporary, retention requirements. Transferring those records to commercial storage or digitizing entire warehouses of records could be extremely time-consuming, cost-prohibitive, and impractical.

- M-19-21 does have a provision for NARA to grant exceptions, if agencies prove that replacing analog records with electronic systems would be burdensome to the public, the cost would exceed the benefit, or for select other reasons. NARA has not announced the process for applying for and granting exceptions.
- Agencies intending to request an exception to continue to produce and store records in analog formats must still incorporate plans to store those records in commercial storage facilities after December 31, 2022.

Next Steps

The bottom line requirement for Federal agencies responding to the challenges of M-19-21 is to act now, without delay. The target deadlines for the directive are little more than three years away. Records Officers must assess the status of their records holdings and program capabilities, prioritize their needs, and make comprehensive plans to reduce their paper footprint and fully embrace electronic RM. Many actions needed to comply are well-established processes that agencies are already performing, such as transferring records to FRCs and scanning documents. The directive now provides an incentive for agency SAORMs to ensure RM programs have the resources and leadership necessary to ensure compliance, implement change to more efficiently and effectively support the business needs of a digital government.

How Can ZAI Help?

ZAI was founded in 1977 as a records management and library services company and has become an industry-recognized business leader, providing a full array of electronic and analog records management services, business processing services, library services, and IT solutions for our Federal Government customers. ZAI provides Records Managers and Subject Matter Experts (SMEs) to Federal agencies to establish records and information management (RIM) programs aligned with Federal statutes, and recommends and implements technologies to support RIM activities within those agencies. We also support multiple customers in digitizing records; some are working toward meeting the goals established by OMB/NARA M-12-18 and M-19-21, and some have simply gone paperless. Our team of NARA-certified Federal records professionals, AIIM-certified Electronic Records Managers (ERMs), and ARMA Certified Records Managers (CRMs) are intimately familiar with the regulations, requirements, and communication practices that help foster strong records management governance and coordination with NARA. ZAI has improved and reengineered business processes, policies, and procedures that resulted in cost-saving measures and enabled Government agencies to stretch their budgets and achieve more, while complying with NARA's requirements.

With RIM as a long-standing ZAI core competency, our past and current RIM clients include the Department of Justice (DOJ), Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), Food and Drug Administration (FDA), National Institutes of Health (NIH), National Cancer Institute (NCI), National Institute of Child Health and Human Development (NICHD), Health Resources and Services Administration (HRSA), International Monetary Fund (IMF), U.S. Navy, Pension Benefit Guaranty Corporation (PBGC), Government Publishing Office (GPO), U.S. Mint, Federal Emergency Management Agency (FEMA), and U.S. Patent and Trademark Office (PTO).

ZAI's RIM Capabilities

- Records Management Assessments, Gap Analysis, Records Management Plans and Roadmap
- Records Digitization and Disposition Plans
- Records Management Policy and Procedure Development
- Records and File Inventories, File Plans, and Records Scheduling
- Records Clean-up, Dispositions, Transfers to NARA/FRC and Commercial Facilities
- Training Plans, Training Materials, Classroom/Web-Based Training, and Outreach
- Electronic Document and Records Management Solutions
- SharePoint Solutions and Tools
- Capture Solutions
- Business Process Management (BPM) and Workflow Automation
- Automated Data Capture (ADC)
- Robotic Process Agents (RPA/BOTs)
- Document Scanning, Conversion, and 508 Compliance

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