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NARA BULLETIN: 2024-XX

TO: Heads of Federal Agencies

SUBJECT: Metadata Guidance for the Transfer of Classified Electronic Records

EXPIRATION DATE: Expires when revoked or superseded

1. What is the purpose of this Bulletin?

This bulletin provides guidance on security classification metadata that must accompany transfers of permanent classified electronic records to the U.S. National Archives. The [table below](#) contains the minimum list of metadata elements agencies must use when transferring classified permanent electronic records. Per [36 CFR 1235.48](#), federal agencies are required to transfer documentation adequate for NARA to identify, service, and interpret permanent electronic records for as long as they are needed.

This bulletin supplements [NARA Bulletin 2015-04: Metadata Guidance for the Transfer of Permanent Electronic Records](#), which provides the minimum metadata requirements for the transfer of permanent electronic records. Agencies must also comply with [36 CFR Subpart F](#), which provides transfer level metadata requirements. If agencies digitize classified records, they must also follow the metadata requirements outlined in [36 CFR 1236.54](#).

Agencies may need to capture and maintain additional metadata with federal records, as needed, for business use. Additional metadata may be transferred to NARA along with the metadata outlined in this bulletin.

In addition to NARA's metadata guidance, agencies must follow other guidance on classifying, safeguarding, and declassifying national security information, including, but not limited to [Executive Order 13526: Classified National Security Information](#) and [32 CFR 2001: Classified National Security Information](#).

2. Does NARA accept classified records?

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Yes. In accordance with [Executive Order 13526](#), Classified National Security Information, an agency must take all reasonable steps to declassify records before they are transferred to NARA. NARA may require that classified records be accessioned into the National Archives when necessary to comply with the provisions of the Federal Records Act regardless of their classification. Classified records accessioned into the National Archives shall be declassified or downgraded by NARA in accordance with E.O. 13526, its implementing directives, agency declassification guides, and procedural agreements between the Archivist and the relevant agency head. Although NARA accepts the physical and legal custody of the classified electronic records during transfer, this does not relieve the transferring agency of its declassification responsibilities under E.O. 13526 and its implementing directives. More information about declassification is available from NARA's [National Declassification Center](#).

3. What about intermingled records?

To the fullest extent possible, agencies should not intermingle classified and unclassified records when transferring records to NARA. However, there are instances where the records must be intermingled to preserve the complete record, such as a case file. When transferring intermingled classified and unclassified electronic records, the term "Unclassified" must be used to populate the Rights:SecurityClassification metadata element at the item-level for all the unclassified records.

4. What if the classified records in the transfer have special control restrictions?

Agencies must indicate any special controls on classified records when transferring them to NARA. The SpecialControls metadata element must be used to populate information specific to special controls on classified records. Special controls access restrictions may include the following:

- Sensitive Compartmented Information (SCI): intelligence information concerning sources and methods which is protected by control systems defined by the Director of National Intelligence;

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- Special Access Programs (SAP): security protocols that provide highly classified information with safeguards and access restrictions that exceed those for regular classified information;
- Atomic Energy Act of 1954: governs the classification of information involving nuclear technology;
 - Restricted Data (RD): data concerning the design, manufacture, or utilization of atomic weapons; production of special nuclear material; and the use of special nuclear material in the production of energy;
 - Formerly Restricted Data (FRD): classified information which has been removed from the RD category after DOE and DOD have jointly determined that it relates primarily to the military utilization of atomic weapons, and can be adequately safeguarded as classified information;
- Foreign Government Information (FGI): classified foreign government information which should be, to the extent practical, separated from other classified information.

5. What if the classified records in the transfer have additional access restrictions?

Each item in a transfer must have metadata for the Rights:AccessRights element that indicates any additional access restrictions, such as Freedom of Information Act or Privacy Act. For further information about the Rights:AccessRights element, see [NARA Bulletin 2015-04, Appendix A](#).

6. How is classified metadata entered into ERA transfer requests?

When creating Transfer Requests in the [Electronic Records Archives 2.0](#) (ERA 2.0), the Access Restrictions Status element indicates whether the transfer contains unrestricted or restricted records. At the transfer level, the highest restriction level of any item is the highest restriction level of the transfer. For example, if a transfer consists of confidential and secret items, the transfer level is secret. For more information about how to fill out the Transfer Request form in ERA, see the [ERA User Manual](#) and the ERA Training Job Aid entitled [Create a Transfer Request](#).

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Where special circumstances require an agency to submit a Standard Form 258 for transfer requests, the agency must include a justification for any access restrictions, according to [36 CFR 1235.20](#).

7. What documentation must accompany transfers of classified permanent electronic records?

Agencies must complete and attach [NA Form 14130b, Classified Records Transfer Checklist for Electronic Records & Digital Special Media Records](#) when transferring a series of classified electronic records to the National Archives of the United States.

Agencies must continue to comply with existing requirements for documentation as described in [General Records Schedule 3.1: General Technology Management Records, 36 CFR 1235.48, 36 CFR 1236.14, and 36 CFR 1237.28](#). These regulations define additional metadata and documentation requirements for specific record types such as digital photographs, data files, and email records.

In addition, all classified electronic records must contain the appropriate markings according to [32 CFR Part 2001](#). Further guidance about classification markings is provided in ISOO guidance, [Marking Classified National Security Information](#).

8. How should I transfer required metadata to NARA?

It is possible to embed metadata in individual files, hold metadata in a records management application, or both. This guidance specifies that agencies provide the identified core elements as an index in a pipe-delimited, machine-readable CSV file and notify NARA of the presence of any additional metadata.

9. Whom should I contact for additional information?

For questions related to the transfer of classified electronic records and their accompanying metadata, the agency should consult with the National Archives and Records Administration, Electronic Records Division, by email to etransfers@nara.gov.

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For information specific to transferring classified digital photographs and their accompanying metadata, the agency should consult with the National Archives and Records Administration, Special Media Records Division, Still Pictures Branch, by email to stillpix.accessions@nara.gov.

For information specific to transferring classified digital aerial maps and their accompanying metadata, the agency should consult with the National Archives and Records Administration, Special Media Records Division, Cartographic Branch, by email to carto@nara.gov.

For information specific to transferring classified digital audio or video files and their accompanying metadata, the agency should consult with the National Archives and Records Administration, Special Media Records Division, Motion Picture Branch, by email to mopix@nara.gov.

For specific questions regarding your agency's operations, you should contact your agency's records officer. A [list of agency records officers](#) can be found on the NARA website. Your agency's records officer may contact the [NARA appraisal archivist](#) with whom your agency normally works. If you have questions or comments about this bulletin or other products on our website, please contact rmstandards@nara.gov.

Security Classification Metadata for the Transfer of Classified Permanent Electronic Records

The table below provides the minimum list of metadata elements and terms necessary for describing classified permanent electronic records. All metadata terms included in the table are repeatable for an individual record, when applicable. Definitions and usage examples are included within the table. The usage statement indicates whether a term is required and identifies the corresponding agency metadata that may be used to populate the element.

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Rights					
Label	Uniform Resource Identifier (URI)	Definition	Comment	Examples	Usage
Rights:SecurityClassification	http://dublincore.org/groups/government/profile-200111.shtml	The classification allocated to the record indicating its official security status.	The purpose of this qualifier is to facilitate proper and appropriate management of sensitive or security classified records.	Top Secret Secret Confidential	Mandatory. If no security classification applies, the record should be labeled “unclassified.”
Rights:PreviousSecurityClassification	http://dublincore.org/groups/government/profile-200111.shtml	The classification allocated to the record indicating its official security status prior to its current status.	Many official documents have their security classification reduced over time. The ability to search on current and previous markings allows a user to locate records that have changed their classification.	Top Secret Secret Confidential	Mandatory when applicable. This element must be populated if the security classification has changed.
Rights:ExemptionReason	N/A	The exemption code associated with the reason the agency is exempting the file from declassification. Use the exemption categories from E.O. 13526, Sec. 3.3(b)(1) to (9). The agency must have explicit approval to utilize a specific exemption.		25X1 25X5 25X9 No Equity	Mandatory when exempting a file. Enter the exemption category(ies) that applies to the file.

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Authority	N/A	The citation from the agency's Interagency Security Classification Appeals Panel (ISCAP)-approved declassification guide that gives the agency the authority to exempt files.		ADG 4.6	Include if captured at the item level. The citation format may vary based on the structure of the agency's ISCAP-approved declassification guide.
Review Action					
Label	URI	Definition	Comments	Examples	Usage
ReviewAction	N/A	The action taken on the file.	N/A	Declassify Exempt Exclude	Mandatory.
ReviewAgent	N/A	Name or identifier of the agent authorized to take the review action	N/A	John Doe ID #78596	Mandatory. Can be applied at the transfer level or file level, as appropriate.
ReviewAuthority	N/A	Authority to carry out the review action	N/A		Mandatory. Can be applied at the transfer level or file level, as appropriate.
Primary Reviewing Agency					
PrimaryReviewingAgency	N/A	The name of the agency conducting the primary declassification review.	N/A	National Security Agency Department of State	Mandatory.

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ReviewOffice	N/A	Name of office of agent carrying out the review action	N/A	Records, Privacy, and Declassification Division Office of Classification	Mandatory. Can be applied at the transfer level or file level, as appropriate.
Refer To					
ReferTo	N/A	The name(s) of all agencies that have equity in the file.	N/A	Department of Defense Department of Energy	Mandatory when applicable. Enter agencies' names for referral even if the primary agency is exempting its equity in the file. The Department of Energy must be entered when the file contains RD/FRD.
Date					
Date:ReviewDate	http://purl.org/dc/terms/date	The date the agency conducted the review on the file.	N/A	19870726	Mandatory. Enter the date the agency conducted the review. Use the format YYYYMMDD.
Date:Declassification DateorEvent	http://purl.org/dc/terms/date	The date or event specified in the agency's ISCAP-approved	N/A	20121117 Upon the death of a ruler	Mandatory when applicable. Enter the new date or event that is specified in the

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		declassification guide for the category of information.		25 years after ratification of the treaty	agency's ISCAP-approved declassification guide for that category of information.
Special Controls					
Label	URI:	Definition	Comment	Examples	Usage
SpecialControls	N/A	Indicators identifying which entity (person or non-person) is authorized to access or process.	Repeatable element containing information documenting any restrictions related to handling and access that apply to the record.	SAP SCI RD/FRD FGI	Mandatory when applicable. This element must be populated with any access or handling restrictions that apply to the record as well as the information access or privacy laws or regulations on which the restriction is based.