



THE DIRECTOR

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
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THE ARCHIVIST

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MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

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SUBJECT: Update to Transition to Electronic Records

Strong records management is necessary for transparency and accountability and underpins our democracy. Transitioning Federal agencies¹ to an electronic — or “paperless” — environment is a priority to enable and increase the ability of the public to engage with Government in new and more efficient and effective ways. It is critical that Federal agencies move beyond paper-based processes and embrace the opportunities afforded to improve Government by transitioning fully to an electronic environment.

Memorandum M-19-21, *Transition to Electronic Records*, issued jointly by the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), established several requirements to move Federal agencies to a fully electronic environment, where appropriate. Agencies may have been delayed in their electronic records transition process during the COVID-19 pandemic. This memorandum reinforces the requirements established in M-19-21, reaffirms the underlying goal of the transition to electronic records, and updates the previous target dates described in M-19-21. This memorandum also describes NARA’s plans to issue updated guidance, as appropriate.

1.1 By June 30, 2024, Federal agencies must manage all permanent records in an electronic format.

No later than June 30, 2024, all permanent records in Federal agencies must be managed electronically to the fullest extent possible for eventual transfer and accessioning by NARA. As

¹ This memorandum applies to “Federal agencies” as defined by 44 U.S.C. § 2901(14).

with the previous policy, permanent records accessioned into NARA or transferred for storage into Federal Records Centers before June 30, 2024, are not required to be managed electronically.

1.2 After June 30, 2024, Federal agencies must transfer all permanent records in an electronic format and with appropriate metadata.

After June 30, 2024, all agencies must transfer permanent records to NARA in electronic formats and with appropriate metadata in accordance with NARA regulations and transfer guidance. Agencies may request a limited exception to this requirement from NARA in circumstances where replacing specific analog records with electronic systems would be burdensome to the public, the cost would exceed the benefit, statutory or regulatory barriers impede implementation, or there is exceptional intrinsic value in the original format.

1.3 By June 30, 2024, Federal agencies must manage all temporary records in an electronic format or store them in commercial records storage facilities.

By June 30, 2024, all temporary records in Federal agencies must be managed electronically to the fullest extent possible. Agencies may continue to produce and store certain records in analog formats if they receive a limited exception from NARA for one of the reasons established in paragraph 1.2, but all other inactive records eligible for transfer after June 30, 2024, must be stored in commercial storage facilities. This does not apply to temporary records that are transferred for temporary storage into Federal Records Centers before June 30, 2024.

By June 30, 2024, all agencies must close agency-operated records storage facilities and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities. Temporary analog records that become eligible for transfer after June 30, 2024 must be transferred to commercial storage facilities that meet NARA records storage requirements.

1.4 After June 30, 2024, NARA will no longer accept transfers of permanent or temporary records in analog formats and will accept records only in an electronic format with appropriate metadata.

After June 30, 2024, NARA will no longer accept new transfers of permanent or temporary analog records unless NARA has provided a limited exception, as described in paragraphs 1.2 and 1.3. NARA will continue to store and service all analog records transferred to a Federal Records Center by June 30, 2024 until their scheduled disposition date. Once those records reach their disposition date, NARA will accept the permanent records into the National Archives in their original analog format and will appropriately dispose of the temporary records. All other legal transfers of permanent records must be in an electronic format, regardless of whether the records were originally created in electronic formats. Starting on July 1, 2024, agencies will be required to digitize permanent records created in analog formats before transfer to NARA. Digitization and transfer must be made in accordance with NARA regulations and transfer guidance, including metadata requirements.

1.5 NARA will issue records management regulations and guidance to support Federal agencies' transition to fully electronic recordkeeping.

No later than June 30, 2024, NARA will issue updated regulations and guidance to provide clear standards for fully electronic recordkeeping. NARA will also issue regulations and clear policies that permit agencies to digitize permanent records created in analog formats and, where appropriate, dispose of analog originals. NARA will issue updated regulations providing agencies with guidance on electronic records storage, formats, and metadata, as well as transfer guidance. NARA will provide guidance to efficiently schedule, transfer, and accession permanent, electronic records through fully electronic processes.

No later than June 30, 2023, NARA will issue updated guidance clearly defining and expanding the Capstone approach to include all types of electronic messaging in addition to email, including ephemeral and encrypted messages. The updated guidance will incorporate new statutory requirements codified in the Electronic Message Preservation Act (EMPA).²

No later than December 31, 2023, NARA will issue guidance on managing Federal records residing in collaborative working environments. The guidance will address ownership of content by multiple Federal agencies across multiple platforms and will support efforts already underway by the Chief Information Officer Council and the General Services Administration (GSA).

1.6 NARA will establish Electronic Records Management (ERM) standards and requirements for Federal agencies procuring ERM solutions and services.

No later than December 31, 2023, NARA will finalize ERM standards and requirements for ERM solutions and services under the Federal Electronic Records Modernization Initiative (FERMI), NARA's comprehensive Government-wide strategy for procuring records management solutions and services. Agencies should use FERMI resources to comply with records management policies and mandates from NARA and OMB, including the requirements above.

² 44 U.S.C. § 2912.