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   >> Good afternoon, everyone, welcome to the bridge meeting for August. My name is Arian I'll serve as moderator. A reminder National Archives and Records Administration hosts these bimonthly records and information discussion meetings or BRIDG. BRIDG is coproduced and live streamed. Generally BRIDG meetings have presentations and open forum to ask questions of presenters or any with a topic of interest. Viewers can post questions by sending an email at NARA.gov. Our staff will monitor during the meeting. You're encouraged to make comments in the YouTube chat. However, please keep in mind all comments are subject to moderation, so we ask you keep the comments relevant to the topics being discussed. Copies of the presentation slides will be posted on the BRIDG page of the archives Website. That's where you'll find links to the transcript of today's meeting when available as well as links and information about previous and upcoming BRIDG meetings if you have general comments or suggestions for future topics use the same email address to pass those along to us. We welcome your feedback. With that I would like to start this afternoon's meeting by introducing Jay Trainer the executive for agency services. Good afternoon, Jay.
   >> JAY TRAINER: Thank you, Arian. As Arian said welcome to the August BRIDG meeting. NARA spends 45 percent of services through five programs information security oversight office, national declassification center, the office of government information services whom you'll hear from in a little bit, as Arian said from the office of chief records officer sponsor the BRIDG meetings. Next slide, please. For today's agenda we'll hear from the Federal records centers along with the office of

the chief records officer and OGIS on a variety of updates. Again we use these meetings to impart information to you and also get feedback on relevant topics.

We can go to the next slide, please. So, for the NARA updates, while we're here at the August meeting I would like to put a plug in for the October BRIDG meeting and ask you to come to the next BRIDG meeting October 18th to hear about the roll outofERA2 .0 as well as training support products planned for the early part of calendar year 2023.

We also have expanded Capstone bulletin and GRS update in the bulletin on managing records and collaborative environments that are being worked on and will be shared with you in the coming months. We hope to have those issued later this calendar year.

We often get inquiries about the agency records office credential, AROC. In January 2023 we start the agency records officer credential renewal process for AROCs eligible, outlined in the NARA bulletin 201902. Another plug for the October BRIDG will have more details about the AROC renewal process during that meeting.

One update that's not on the slide, but we do get a lot of questions about, is M1921, NARA and office of management and budget are in active discussions around the memo. As of now, the December 31st, 2022 deadline has not changed, and agencies should continue to make plans and work towards achieving the goal of the memo which is transitioned to electronic government.

These plans will be helpful if the deadline change, because agencies will be able to use sorry, will be able to confirm whether or not they need to submit an exception request. These plans will be helpful if the deadline doesn't change, because agencies will be better prepared to submit exception request. NARA bulletin 202001 contains guidance on how to submit a exception request and what factors to consider. OMB and NARA have not yet approved any of the exception requests submitted. We can go to the next slide, please.

At this time, I would like to turn it over to the acting Director of the FRCP, Chris Pinkney, along with some of his staff for an update around the Federal records center program. Chris?

>> CHRISTOPHER PINKNEY: Thank you, Jay, thank you, Arian. I guess for the August update, art and Jeff actually have most of the neat things to say, so I'll confine my general remarks and keep them relatively short. In light of the last couple of years, I should probably lead off by saying all FRCs remain fully open and NARA staff are actively working on reducing any remaining back logs. Our Federal staff continue to work overtime, on weekends and some Federal holidays in an attempt to get current. Many centers remain in areas where high COVID transition continues and all of our sites we continue to implement operational adjustments in an effort to protect our staff. We like most other businesses and agencies in the country remain somewhat shortstaffed and it's very important we keep all of us safe and healthy if we're going to get the work done.

To further assist with back log reduction the FRCB brought almost 100 contractors and temporary contractors have on boarded at regional sites. Recruitment continues and contractor effort on reducing back log is focus.

While we have COVID back logs we have other substantial projects to complete. I would argue recent progress is impressive. During 2022FRCP staff destroyed 810,000 cubic feet of material from which we received concurrence, staff

Sheffield more than 562 cubic feet of newly received records and we have another 215,000 cubic feet of approved transfers in the pipeline headed towards the FRCs. FY22 is certainly not a regular year, but particularly since May, the volumes we're seeing are starting to look more like our pre pandemic number.

    And so, on that note, I'll conclude the general remarks and pass the Paton to Art Hawkens FRCP's acting Director of customer relation manager, to say a few words of the new invoicing application.

    >> Good afternoon, I'm art Hawkins, the acting Director for the Federal record center program. Right now we are in the process of getting the invoices or actually the IAAs in our agency agreements out. At this stage, they are called the GT&Cs which is something brandnew for us, because we're now involved in invoicing. We met with Colleen Murphy, our CFO back in June to discuss the invoicing and one of the great things about it and how it's going to help us move forward and get through this process a lot quicker and a little more stream lined, and since then the CRM team has had or customer relations team, has had numerous meeting was the folks at the Department of Treasury, working to under the invoicing, working to understand the process, and going through the various and different parts of the software, to make sure that everything runs as smoothly as possible. And the great thing about the invoicing in our eye, it allows us to get IAAs or interagency agreements out to the proper point of contacts within the agencies, quickly, have those agreements come directly back us to, in a timely fashion, of the entire interagency process is now stream lined because everyone is on the same page. It allows our finance department to have a direct pipeline to the customers, agencies and to ensure timely collections, again the CT&Cs the 7600Bs are CN&Cs, have gone out last week, August 3rd. We expect back us to by August 31st at which time the actual order or 7600Bs now called the orders will go out by October 4th and approved and back us to by October 17th. Again, agencies, your customer relations management team is working diligently to make sure everything gets out to you in a timely fashion and we hope you're able to turn those around and get them back to us as well. So, I believe Jeff Lundsford is up next, Jeff, over to you.

    >> JEFF LUNDSFORD: Thank you, Chris, Jay, art, for attending today's BRIDG meeting. I have two really quick updates, good news on both of them. One is that the FY2023 rate schedule has been approved. It was signed by the Archivist on August 4th, which is easily two months and change earlier than prior fiscal years. We worked very closely with the CFO's office to get those rates to data collection, to do all analysis and enter into negotiations and meet with the CFO to present the rate schedule to the Archivist. We did so clearly in support of transitioning to the G invoicing platform. That was a critical milestone in our March to get there. But also, we heard customer feedback that some of the timing of getting all of the pieces together in order to just go through the IAA process wasn't I deal and we certainly hope having the rates available to you, as early as today, August or, back to August 4th, makes that possess a little bit easier. And certainly, with the others streamlines that we're seeing through G invoicing, I really have an optimistic Outlook getting these IAAs signed and approved and in place in time for the new fiscal year.

    The other bit of good news, if you haven't seen the rate schedule for FY2023, is that our prices actually went down, and I think there's probably a sea of cheers that I can't actually hear right now. Your bread and butter rate, our temporary storage

rate percent month went down by 5 percent, and if you're familiar with the rates, that actually that price includes all of the standard, not just storage, but reference, refile, interfiles, disposal. Everything is rolled up into that rate and it went down for FY2023. Very, very pleased that we are able to extend that reduction to all of our customers, and certainly, plenty of our other rates also saw reductions. It's not just that storage rate, there's plenty others. So, rush over to your G invoicing platform, call your customer relationship management account manager and check out the new rates. I do want to take a quick moment to thank everybody who is involved in not just putting the rates together but putting them together in such a compressed time frame, including all of the FRC Directors nationwide, Art's team, Chris, leadership of FRCP, Jay, leadership of agency services and our CFO. We worked with him very closely on that. That's all I have for today. Thank you so much. I think I'm going to open it up for questions in anything we covered in the FRCP update section.

So, turn it over to Arian. Arian: Thank you. One question we had was about the timing of FY2023 agreements. There's positive feedbacks in the YouTube chat about the new rates. I think we'll keep it open for a minute to see if there's any additional questions. As a reminder if you think of something later, drop it in the chat and we'll address it at the end of today's meeting. Since I'm not seeing anything come through, I would like to let's move the program along. I would like to call on Cindy Smolovik from records management oversight and reporting team to brief out the Federal agency records management report for 2021. It's all years, Cindy.

>> CINDY SMOLOVIK: Thank you, Arian. It's that time for me to walk through annual reports that your agencies submitted. Next slide, please. The date covering 2021 activities we gathered information from January 10th to March 11. We had a 96 percent response rate, and I want to thank all of you for making this happen. We couldn't do the report without you responding to our call for all three reports. The topics that I'm going to cover today are the questions that were on the annual reporting related to M1921 talk about the impacts of COVID19 during this reporting period, and information governance, and integration of records management into information technology plans, data management and overall IT resourcing, which were on the senior agency official for

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>> Cindy, have you lost connection? P Cindy, please try to reconnect. We have lost. I can't hear you. Please excuse us for this short technical difficulty.

>> ARIAN RAVANBAKHSH: Sure, we have a couple questions that have come in from the records center program, if Chris and his team are around, I can ask those I can ask the one that came in. We understand the processing agreements will lag behind those enabled in the G invoicing system is that correct? And what sort of lag it we expect

>> Art Hawkins: This is Art. We do expect a lag, that's something we will be working with the finance department on, but, again, we're hoping that all of the other agreements are in by the, I believe I mentioned the 17th of October. And hopefully if it's not in by then, we will have are to address it another way, and we're not exactly shower how much further behind that will lag yet. Please feel free to reach out to your account manager or reach out to me offline and I'll see what I can find out for you.

>> ARIAN RAVANBAKHSH: Thanks, Art. Related to that when can agencies expect to see the rates?

>> ART HAWKINS: Rates will have gone out along with CT, Cs have gone out last week. If you haven't gotten yours, we have a lot of stuff to take care of. They should be out to you within the next week or two.

>> ARIAN RAVANBAKHSH: How were the again terms and conditions sent to agencies via email to the POC or some other process?

>> ART HAWKINS: The general terms and conditions will be attached in the GT&C.

>> CINDY SMOLOVIK: Arian can you hear me?

>> ARIAN RAVANBAKHSH: You're back. Those are the questions we had for FRCP. Cindy we'll turn it back over to you to pick up.

>> CINDY SMOLOVIK: I had to dial back in. Hopefully the connection will stay this time. Basically where I left off, the last topic I want to talk about is some points for electronic records management that came out in the reporting. Next slide, please.

As much as you know, annual reporting consists of three different pieces as seen here on the slide. The SAORN report is the only one that changes content. The RMSA is older, that's why we have three reports. It is more comprehensive. With objective questions and not much explanation for explanation or detail. Security models are targeted to electronic detail, and has more detail that the RMSA can't do. It is much more detailed and covering more narrow topics from senior and more strategic level than the other two reports do. Next slide, please.

Each year we look to see if there was anything that stood out from prior years. Looking at this year's data, the most thing that stood out was decline and confidential of meeting the 2022 target date from M1921. The reason for this is pretty much easy to blame COVID19 for everything, but we really do think the pandemic did influence the decline and confidence in meeting the deadlines. For example, the deadlines for digitizing paper records or moving them from agency storage spaces to the Federal records centers or commercial storage facility was hampered by the reduction and access to where she's records were stored both in 2021 and 2020. Other regions agency gave us were some agencies were continuing to evaluate the costs involved. There are still cultural change issues that agencies are working through and there are still some records that will require paper due to laws that have not been changed that require hard copy or signatures, and there were some other requirements. Next slide, please.

We continue to ask about record storage requirements, because, of course, in 1921 deadline, includes changes to our agency store records, either in agency space, or Federal records centers and move them to commercial storage or transfer prior to the deadline records to the Federal records centers.

We have been, however, asking questions about storage long before N1921. On the left, you will see most agencies, when asked if they were using commercial storage or have agency operated records centers the vast majority of agencies said no. On the right, most agencies also indicated that they have no intention of using commercial storage in the future. It was also about evenly split when asked if they plan to move records to the Federal records center, or continue to use agency space.

We do want to note that most agencies do not define agency space as an agency operated records center. And there were also a small group of agencies that responded that they didn't know what they were going to do to change their records storage.

Next slide, please. We did ask if agencies plan to ask for an exception to M1921. The majority of agencies said no. They were not going to need an exception. However, those that said that they did, and that's the area in blue in the bottom slide of the slide, there was a distinction in what they were asking for. There is a group that were asking for a total exemption, meaning they feel they can't move totally away from paper, or change their storage. There's a smaller group that want both, an extension, but most of them in the smaller group said they just need an extension to the deadline and not a total exception to it. They feel like they were going to be able to meet the goals but it just needed a little more time.

The combination group, which was at 42 percent of the 34 percent, said that they needed both, that they had some things that just needed more time, some things that needed an exception, because they wanted to keep them in paper, and this also included a group of agencies that responded, yes, but their comments said they really weren't sure if they were going to submit one or not, and they just wanted to cover themselves by answering yes.

I also want to say that as a reminder, answering this question in annual reporting, does not constitute submitting the exception request itself. You still need to go through that process.

Next slide, please. COVID19 impacts are interesting. On this slide, the table shows the top responses, both for the negative responses, where it was a negative impact, and a positive impact, as a silver lining to COVID19. In the middle, there are eye group of answers where there are more of what action was being taken, so, we wanted to capture those as well.

You can see that there is successful remote access to electronic records in two columns, it shows up under a positive impact. It also shows up in the middle as an action, so, it was just interesting to have both of them there together. It's not a mistake on the slide. That was intentional.

On the negative slide, there were still delays in various activities, evaluating programs. Of course the delays in meeting M1921, a reduced ability to do disposition, and some limited access to paper in agency space or in storage.

Next slide, please. For this question on the senior agency records management template. They were both interested in use of special item number for procurements. Both agencies have not used it yet. While there are some that said that they won't use it, some were saying they were still going to explore it. There was again a small group that answered yes, to using it but then in the comments said they have not used it yet. Not sure exactly why other than the interpretation of the question could have been, if you considered using it, and then have used it or not, and so, some of them the responses under the 29 percent who said yes, were looking at, yes, they considered it, but have not used it, or decided not to use it.

Next slide, please. Information governance, and how well records management is integrated into the framework, has been an interest to NARA for quite a while. We asked over several years questions regarding this framework within

agencies. Most of the answers were that they were indeed forming partnerships and relationship, or at the very least, there was communication and coordination going on between records management and other information and data managers. There were a number of agencies that concluded that they have advisory boards, councils or working groups to bring records management and other information governance, parts of the agencies together. There were a number of agencies that included additional information about how they're integrating records management into the framework. Some of them were of you know, just simple as meeting and coordinating and talking to each other. A few of the smaller micro agencies said that they were too small and didn't really have an information governance framework, but they were at least working with their I.T. individuals when needed.

   We make no particular value judgments on all of these responses, other than it's really good to see that the relationships are building.

   Next slide, please. This should be a slide that a lot of you are familiar with. We do this each year. This is showing the risk levels and comparing them back at least four or five years. As you can see, they levels have remained pretty much standard, but we get questions on what annual reporting risk means. Annual reporting risk is the risk around not being in compliance with regulations and for the returning models not meeting some of the success criteria for electronic records management in email.

   When an agency rates itself as low risk we tend to believe they have the basic fundamentals necessary to meet the regulations and success criteria. When an agency rates itself as moderate risk they may have some or most of what is required but have areas that they are working on. When an agency rates itself as high risk this can mean they need help in being in compliance or build are still in early building stages.

   Agencies in high risk don't always have records at risk, particularly smaller micro agencies where the volume of record is very small and it's easy to know where the record are, what needs to be done to access and protect them. You have to keep in mind that there are some agencies where all of their records fit into a single file cabinet or they only use one or two computers, because they are that small.

   In talking to these agencies in high risk, we have also found that some misinterpret the questions and answer no, because some of what we ask is handled by a contract or another agency as a service. But they thought that the question is asking, do they do something personally. We have tried to tweak the wording of our questions and answer options to address this where we can. We always appreciate the feedback we get on the RMSA, that's one of the last questions we ask, how can we improve it and we do try to tweak the answer options where we can.

   Overall this data reflects that records management is a continuous and dynamic process and the state of the records program, record being managed by Federal agencies changes depending on governmental reorganizations, technology improvements, changes in personnel, other resources can change and there's a variety of other factors that change from year to year. Requiring annual reporting NARA can capture information for a defined period of time, identify trend and common challenges and all of this helps us create policy and guidance training and oversight where it is needed most.

Next slide, please. This slide, compares the maturity models from part 1 and 2, email on the left is more mature than the electronic records management on the right. But they are not as far apart as they were when we first introduced part 1 in 2019. The same remarks I made about what the risk levels mean for RMSA can also be made tore these reports.

Next slide, please.

Even when the majority of agencies score themselves as moderate or low risk on majority models electronic records management data still indicates there are weak points. Moderate or low risk answers in the maturity models include areas that are building toward maturity, and most agencies have not achieved all of them. Of all of the point on this slide, you will notice that none of them reach 50 percent of agencies being able to say that their program meets these elements completely. Many are still below 40 percent, including records management participation, and systems, development or in the retiring of systems, as well as identifying permanent email, and transferring them to the National Archives. So, it's fair to say that there is more work to be done in this area.

Next slide, please. The annual report of for 2021 that goes to Congress is based on all of the information we received from you, has already been released and is available on our Website, along with all of the individual SOARM reports, and there is a spread sheet for the maturity model that is also on our Website. If you're interested in the statistics for each question that the RMSA and email maturity model and permanent records maturity model covers, there's an appendix in the report that covers each of these. The appendix is also where you find individual store for your agency.

Next slide, please.

And, of course, the cycle begins again. We are currently preparing the questionnaires and templates for 2022 that will return in 2023. Most likely the dates will be similar to those from the first part of January to the middle of March like we've done for the last several years. But watch for an AC memo announcing the actual dates. As always, if you have any questions or updates to your agency annual reporting contacts, you can send them to this email address, RM self assessment all one word, all run together, at NARA.gov. And you can always reach out to me if you have any questions.

That's it to me, and thank you, back to you Arian.

>> ARIAN RAVANBAKHSH: Thank you, Cindy, we do have sort of a comment, adding the option not applicable to some of the questions would be a great option. This was under the slide on weak areas, the weaknesses in ERM, a couple slide ago.

>> CINDY SMOLOVIK: Yeah, we have not applicable options for the records management self assessment and we're going to add a few of that maybe to the SAORM templates. Maturity models scenarios don't have room for that. You either have what the scenario said or move on to the next one or the one less than you already have. But we have tried to add not applicable, especially for small and micro agencies where we can, or when some we tried to clarify the instructions for when something is handled by a contractor or another agency, so that it so instead of just plain not applicable. But we always look through questions looking for where we can add that or clarify what a yes or no answer means. So, thank you for that input.

>> ARIAN RAVANBAKHSH: And thank you for responding. What we will do, if we get any more questions, we'll circle and answer, I'll ask you those at the end of the meeting.

>> CINDY SMOLOVIK: Thank you.

>> ARIAN RAVANBAKHSH: You're welcome. Now I would like to call on Kirsten Mitchell for the update on RMSA reporting and FOIA advisory committee. Kirsten?

>> KIRSTEN MITCHELL: Thank you, Arian. I'm Kirsten Mitchell coming to you wearing two hats as the RMSA team lead from OGIS which receives as FOIA ombudsman and dedicated officer for FOIA advisory committee update which Alina Semo chairs. On behalf of the adjustors thank you for all of the work you do to manage records. It's a quiet job with enormous implications. As we say here at the National Archives, records matter. Today I will discuss two topics very briefly. FOIA questions on the RMSA, and the most recent FOIA advisory committee recommendations that touch on records management. Next slide, please. Thank you. So, given the strong tie between record management and FOIA, the office of the chief records officer, once again, allowed us at OGIS to piggyback on the RMSA. We really appreciate the partnership because a strong records management program, which allows agencies to find records responsive to FOIA requests is essential to a successful FOIA program.

So, we asked four FOIA questions that were included in the RMSA, three of them pertained to the ongoing COVID19 pandemic, and I can't believe I'm saying that two and a half years into this. And then we had one other question that dealt with the relationship between each agency's agency records officer, and the cheer FOIA officer.

We have not yet published our report, but I want to recognize my colleague, Daniel Levinson who dealt into the result, analyzed them against the observations that we make as the FOIA ombudsman's office, and he also wrote the report. So, thank you, Dan.

So, you all in the audience have a lot of information coming at you today. So I'm going to give you a very brief overview of the results. Next slide, please.

So, with regard to the ongoing COVID19 pandemic, it's no surprise that while a majority of the agencies reported no disruption in the ability to respond to FOIA request, those who did report a disruption, 78 percent reported that the reason was that paper records were inaccessible due to office closures. And this matches very much our observations, at OGIS, throughout the pandemic. We at OGIS observed that records were inaccessible, because Federal offices and Federal records centers, were partially closed. It's really important to note, however, the record centers throughout the country, continue to process emergency requests for records from agencies.

The other thing to note here is classified records. Of course, are required to be stored and handled, in secure government facilities, and during the height of the pandemic, that those facilities were inaccessible.

Also, regarding the COVID19 pandemic, a majority of respondents reported that their agencies work directly with FOIA requesters to tailor their requests for the most efficient processing during the COVID19 pandemic. And they did this in a variety of ways, including providing information about anticipated delays, in their

communication with FOIA requesters, posting notices on their FOIA Websites, and generally letting requesters know the most efficient Kay way to make requests.

And just a reminder that these results, as Cindy noted, are from a snapshot of calendar year 2021, so they may not reflect today's environment.

Next slide, please.

So, the relationship between records managers and FOIA professionals, has been the subject of several RMSA questions over the years. And the most recent RMSA asked about the relationship between the agency records officer and the chief FOIA officer at each agency. Those are the folks overseeing the respective programs at agencies throughout the government.

We had some really good news here. A majority of the respondents, 56 percent, reported that agent that the agency records officer, and the chief FOIA officer worked together on information requirements that benefit both programs. That's a 4 percentage point increase from the previous year, and we're just very happy to see that.

The other piece of good news is that 50 percent reported of the agency records officer, and the chief FOIA officer, work together to identify programs or offices most likely to have responsive records and that's a 6 percentage point increase over the previous year. So, we are thrilled to see these upticks and we hope those trends continue.

Next slide, please.

Okay, so, I'm going to take off one hat, put on the other, switch topics and talk about the FOIA advisory committee. 20 FOIA experts from both inside and outside the government, comprised the FOIA advisory committee, which studies the FOIA landscape and makes recommendations to the Archivist of the United States. The fourth term of the committee finished its work early this summer and approved a final report that includes 21 recommendations for improving the FOIA process. You all will be very pleased to know that I will not go through all 21 recommendations, but instead will highlight four percent taping particularly to records management.

Although the most recent term of the committee did not have a subcommittee devoted to records management as the third term did, committee members understood that a solid records management program is a back bone to a strong FOIA program. So, I'll go through these four recommendations that touch on records management.

Next slide, please. Okay, so, regarding FOIA Websites, the committee recommended that the office of information policy at the Department of Justice, which issued FOIA guidance, encourages agencies to post on their FOIA Website certain information beyond what is required by law. And of the 16 elements that were recommended in this particular recommendation, three are of particular interest to records managers P. A link to a description of records maintained by the agency, as well as a description of records that do not exist at the agency, a link to agency records schedules, and a description of the agency's Capstone female policy, a current list of Capstone officials and agency's email retention policy.

Now, some of these are already contained in such things as the Department of Justice's essential elements of FOIA web pages or on the DOJ FOIA DOJ site, FOIA.gov. But the committee felt very strongly that they should be reiterated and stressed their importance to improving the FOIA process. The idea here being that if these things are provided on a FOIA Website, that requesters will have better

information about the types of records that an agency has, or does not have, and can sort of take steps as appropriate with regard to FOIA requests.

Next slide, please. Okay, so, this pertains to native formatting and metadata, and what the FOIA advisory committee recommended, is that the chief FOIA officer's council should establish a working group within two years to determine best practices for release of records in native format, including metadata. NARA bulletin, 201504, defines metadata as elements of information that answers the questions, who, what, where, when and why, regarding electronic records. And metadata is of increasing interest to FOIA requesters. They are interested in getting the metadata tied to certain records, and it's also of increasing interest to agencies as the government receives these requests but also transitions to a fully electronic environment.

So, among the recommendation that the committee made, was that all requesters should generally, if they requested, receive information such as the file name, the record ID number, that the agency uses, title, creator of the record, the creation date, and so forth. The committee did note that classified records are in their own realm, and may necessarily be subject to this.

Just one more thing to say about metadata, the procedures and tools often used by agencies, to process records for public release under FOIA, generally strip away metadata, and that's important not just to processing records under FOIA, but for 508 compliance, which leads to, next slide, please, another FOIA advisory committee recommendation concerning 508 compliance. And as many of you know, there's a real tug going on between those two statutes: The rehabilitation act and FOIA. And the FOIA advisory committee recommended that the chief FOIA officer's council establish a working group to study and recommend resolutions to challenges between these two laws. This is, as I said, a real tug between these two laws. I'm not sure there's a Federal agency out there that doesn't have this as a challenge.

Section 508 of the rehabilitation act, many of you know this, but for those of you who don't, it requires, among other things, that all records posted to agency Websites be accessible to people with disabilities, unless doing so would pose an undue burden on the agency. Making a document accessible means that the text be machine readable, and that any charts, graphs, pictures, or tables in the document are tagged and described in a way that enables the screen reader to accurately describe the document to a reader with visual impairments.

As I said, this is an ongoing challenge, so much so, that OGIS, has recommended to Congress three times that it pass legislation to provide agencies with sufficient resources to comply with the requirements of both law, particularly as they relate to proactive posting of large numbers of records.

Congress has not acted so the advisory committee decided that a working group should study the issue, and recommend some solutions.

Next slide, please. Finally, the last recommendation I'm sharing with you today pertains to firstperson FOIA requests. And what those are, when an individual requests record pertaining to him or herself. Sometimes a privacy act request, sometimes not. I won't get into that here, but the committee recommended that records relied on my any agency, that affect eligibility for benefits, or adversary affects an individual in proceedings, in agency proceedings, should be automatically available and not require first person FOIA practice.

So, basically, at some agency, in order to receive a benefit, or to represent oneself in an administrative proceeding, one must make a FOIA request for records pertaining to oneself, in order to receive that benefit or represent oneself. The committee spent almost two years looking at this issue, studied it very carefully, and felt very strongly that in such cases, records should be made available to the individual without requiring a FOIA request. Why am I mentioning this recommendation? Because it has the potential to affect how certain records will be accessioned in the future.

So, thank you, all, for listening today. As I said at the start of my presentation, records matter. And Arian, I'm happy to answer any question, listen to any comments. So, I'm going to throw it back over to you. Thank you.

>> ARIAN RAVANBAKHSH: And thank you. Thank you for that. We have a couple of questions that have come in. As a reminder to our audience. You can leave questions at the YouTube chat or by email rm.communications@NARA.gov. The first one, where can I find the FOIA advisory committee's final report and recommendations?

>> KIRSTEN MITCHELL: That is on the OGIS Website. There's a link there. Can you throw that into the YouTube comments?

>> ARIAN RAVANBAKHSH: We'll get that in there at some point.

>> KIRSTEN MITCHELL: Okay. Thanks.

>> ARIAN RAVANBAKHSH: Will there be a records management subcommittee on the next term of the FOIA advisory committee?

>> KIRSTEN MITCHELL: Oh, that's a great question. TBD, to be determined. The new committee is just being appointed and named and so forth, and the first meeting is on September 8th. The meeting after that is on September 14th and at that point it's up to the members to sort of decide what direction they'd like to go. So, maybe, maybe not.

>> ARIAN RAVANBAKHSH: Or in the immortal words, stay tuned.

>> KIRSTEN MITCHELL: Stay tuned exactly.

>> ARIAN RAVANBAKHSH: When will OGIS' report on the RMSA be published?

>> KIRSTEN MITCHELL: That would have been a great thing for me to mention. Wouldn't it have? It should be up on the Website by the end of the month. It is finished and just going through some final review, and our Website is archives.gov/OGIS. So, and it's a much shorter report. Obviously, we only had four questions, so

>> ARIAN RAVANBAKHSH: So, I'm going to read these other ones, and you can take them. With FOIA online sun setting at the end of 2023, many agencies currently searching for a new system, how will records released through FOIA online be available after 2023.

>> KIRSTEN MITCHELL: Well, that is something that a lot of people in the government are currently working on right now. The chief FOIA officer's council has a group that is looking into these things. We at OGIS held Nexgen showcase with a lot of solutions that agent significants can consider. It is something that agencies are considering but too early to tell.

>> ARIAN RAVANBAKHSH: Another one, and this came in right before you talked about 508. So I think we've covered it. How OGIS enforcing all agency's release records that are fully section 508 compliant?

>> KIRSTEN MITCHELL: Goodness. First of all we are not the FOIA enforces. So we don't enforce that. And 508 is really not our area of expertise. What we are interested in is the FOIA process and making it work as most efficiently as possible. So, we cannot we cannot enforce it. But we always encourage agencies with regard to these two statutes to talk to their general counsel's offices to get guidance from them as to how to comply with these two statutes.

>> ARIAN RAVANBAKHSH: And this is on the topic of firstparty requests. How is the ID validated or do you recommend, does OGIS recommend best practices to validate IDs?

>> KIRSTEN MITCHELL: No, we don't recommend we don't have any recommended best practices on that, but there is a I know the Department of Justice uses certification of identity form, if only Elena were here, she could rattle off the number off her tongue, I don't remember the form but other agencies use it as well to identify the identity of requesters. Clearly that was an issue.

>> ARIAN RAVANBAKHSH: Finally there's back and forth what is the NARA bulletin you mentioned with the metadata requirements?

>> KIRSTEN MITCHELL: The number is 201504.

>> ARIAN RAVANBAKHSH: 201504.

>> KIRSTEN MITCHELL: 04. Yeah. When the FOIA advisory committee, they were actually having a discussion about how to define metadata, and they found this this to be a good a good definition. So, we encourage them to use that definition.

>> ARIAN RAVANBAKHSH: So, thank you. I think we covered there were a couple other comments around metadata, it was interesting, for example, Adobe acrobat has a feature to sanitize certain file information, and a comment that metadata is usually key for FOIA searches, so that's a good comment from the YouTube community there.

>> KIRSTEN MITCHELL: Yes.

>> ARIAN RAVANBAKHSH: At this point, we'll open it back up to all the presenters for general questions and answers and things we may have missed.

So, Lisa, are you ready to call on board? Call on Lisa Haralampus directly of policy at NARA. Hi, Lisa. Will NARA pose any approved exemptions once one has been approved?

>> LISA HARALAMPUS: I have now taken my hand off the keyboard. As someone who copies questions to answer them all. I think I can answer this. To answer the question, I feel I have are repeating things about M1921 deadlines, because people are interested. Once we get those questions, right behind it there's questions about exceptions. Our status is the same. We continue to receive exception requests and process them but we have not had exception requests receive approval from NARA and OMB. That's the goal and we're working as fast and quickly as we can. Because we know agencies are acting continuously about exception requests. So, an interesting question that's been asked. So let's assume they are NARA approved. Will you post those. At this point we don't have plans to post them online the same way we have posted other report. Those are really going to be tailored to each agency. So if you're looking for information, I would like to see an approved one so I know what to put in my request, I would say please reach out to our team mailbox, rmstandards@NARA.gov. That's something on coordinated agencies, so, if you're asking if we are going to post them, reach

out for help. If you want to know what is happening next, how will you post them? I say if we're planning to post exception requests online, we're planning to take that exception request once approved and put them into the current systems and current case files because we recognize we need to know what's been approved, as will future NARA staff who might come in and start working ten years from now and all of a sudden be, yes, that's the time when this exception request will be approved. I had requested receiving paper copies for five, ten year, whatever that may be. That's the answer to the question. Let me know if there's followup.

   >> ARIAN RAVANBAKHSH: I think that answered question. The other is an update on current regulations

   >> LISA HARALAMPUS: I'm sorry to sound like a broken record. Yes the status is the same. We're working on digitization records. We're working hard and hoping to have more information soon, since I said this so often, I'm no longer even qualifying what soon is, other than to say, please sign up, to receive RM emails or please sign up to follow our records express blog or do both because when we have information to share, we will share with those two communications vehicles. We will put it on the blog. We will send out an AC memo through the RM communications which is the emails that we send out. Those are the two places to stay tuned to learn the very latest, very soonest we have status updates on the digitization regs. Again if you have a specific question, the same team, so email RM standards@NARA.gov. When we finish answering the exception question we'll answer the digitization regs question, too.

   >> ARIAN RAVANBAKHSH: This is a question for Chris Pinkney. Are hard copy Chris, are you here?

   >> CHRISTOPHER PINKNEY: Yes.

   >> ARIAN RAVANBAKHSH: Are hard copy unscheduled records proposed for shipment to Federal agencies to the FRCs becoming a huge issue or a showstopper for NARA during this period.

   >> CHRISTOPHER PINKNEY: The easy answer to that is no. The FRCP continues to accept unscheduled records as well as collections where there's a pending schedule. If they are unscheduled, we will treat them as permanent records while in our custody and then we work with folks to make sure they ultimately do get scheduled. If we have advice, it would be don't comingle. It would be one series for transfer, if it's coming in as unscheduled it could be permanent so we need you to include a detailed box list for that transfer and the other caveat. Russ, our acting director of TMB reminded me they have to Nets MC if they are scheduling records for FRCP, just in case they ultimately become permanent.

   >> ARIAN RAVANBAKHSH: Thank you for that. I think you're good. Cindy, are you here? This is a question about the FR the annual reporting I have a question on Cindy's

   >> CINDY SMOLOVIK: I'm here if you can hear me.

   >> ARIAN RAVANBAKHSH: Yes, we can. Thank you. I have a question on Cindy's presentation on annual reports. She stated most agencies anticipate meeting the requirements of M1921. However she then stated less than half of the agent significants do not consider themselves being mature in accordance with the maturity model. I don't know how this is possible. My agency is not mature, but

we will not be able to meet the deadline even though since we had ERM since 1999.

>> CINDY SMOLOVIK: Thank you for that. The easiest answer is mature models are based on universal area requirements and success criteria for managing permanent record and email. They are really not related to M1921 deadlines. Majority in measuring these programs for managing both email and permanent electronic records, will go way beyond whatever the next deadline for 1921, either this December or whatever happen was it, so, the difference is, you can be working towards having a lot of good electronic records management. You can still have paper that you're waiting to digitize and get into that process to meet M1921, and the two reports are really not related to each other. I hope that makes sense.

>> ARIAN RAVANBAKHSH: I think it did. I think it answered the question.

 Lisa, curious comment that said, I'm curious about Federal agency records tieins with the Federal management chief data officer?

>> LISA HARALAMPUS: Thank you, I, too, am very curious how the establishment and watching the data officer community and Federal data strategy and all of the emphasis that's been placed on data management as a professional has been established and evolving and maturing like a Federal entity, so, I would like to say, thank you for the opportunity to talk about that. Because we're definitely interested in seeing opportunities to leverage data management or records management or information management professional communities. They have some similarities. My comment would be, thank you for ask, because I'm very interested, and my recommendation would say, if we can do it I ask one of my colleagues to post one of our recent assessment reports. We've been so interested in this, that my colleagues in our oversight reporting program that done Rosen runs and Cindy is a part of, one of their teams, didn't d an assessment for NARA earlier this year, and we sort of looked at some basic facts to see how data management and records management might be working together. So, it's not an inspection report, it's an assessment report which we share to sort of learn and look for best practices. Is there anything we found we could recommend to other agency, so, I would say stay tuned. I hope we're able to have future conversations about data management and records management at BRIDG meetings, I also believe that Don Rosen will be talking about that report at an upcoming Federal records officer Ned network. So, those who come to bridge and go to that. You'll hear about that later. And as typing and talking realtime. I should mention that Laurence Brewer who is not here before. I hope he's enjoying his August vacation, and Alina Semo who is here, are exofficio members of data council. We have opportunity to update records management in their space and invite people to talk to us in our space. We have a couple of questions built to the CDO community and we hope to continue to have more so please keep asking. Thank you. Thank you to my colleagues who reminded me about that last answer.

 And Arian I can come back, I saw the question about the regs. Sun said I missed what she said my audio cut out. The regs have in the been published. It's what we published in December of 2020. We have made changes to the regulations since that. That was the whole point of the process. I would say to characterize them, we have made the regulations easier to understand. We have made them we have grouped things better and we have been more direct, because

back in 2020, I think we are doing a lot of explanation, those are the changes that we are making but the question, are there any standard or technical changes and from a broad brush perspective, the answer is no. So, what you see posted and then where we say we'll map we did to map to FAGI committee. We have updated the standards a little bit to help map to some of the comments we have received. If you were looking for the very latest and greatest again email rm standards or check the latest changes to FAGI, because you'll see tweet there's, that reflect things we learned as we go through agency comments.

   So, I hope that answers that question. Thank you, patty, for asking it. So, we're working on it. You find there's no technical updates in the standards, there are a few in the FADGI documentation, email us, and we'll send you some more information. Which I can at least commit to that Patty. I can send you back some information.

   >> ARIAN RAVANBAKHSH: Lisa, this is another question that's come in on the YouTube chat. Is NARA planning to do a blanket revocation, to cover the thousands of legally approved disposition authorities that, one, say to explicitly store temporary records at WNRC or FRC, and, two, invalidate in all still valid disposition authorities approved pre2007, the date the media neutral policy went into effect?

   >> LISA HARALAMPUS: I need to hear that question again, sorry. That was a complicated question. If any of my colleagues have thought about this ahead of time. Please feel free to jump in and help me as I go over that.

   >> ARIAN RAVANBAKHSH: Let's break it into pieces. The first question is NARA planning to do a blanket revocation to cover the thousands of pre approved disposition authorities that explicitly say store temporary records at FRC.

   >> LISA HARALAMPUS: Let me take it to this. Is NARA planning to do any blanket exception requests the answer is no. Is NARA planning to do work on RM to revoke authorities which no longer work. That is a very good question, I'm not sure of that answer. So I'm going to have to find a way to get that answer in another vehicle, because I have to go look at that into some depth, make sure I understood it, make sure I give you a factual answer. I think the answer is no I know we're not doing any blanket exceptions at this time. There's one exception in particular that might fit under that, that we are aware of an issue and we're working to address it and that is the employee medical files, EMFs that are part of the official personnel file, OPFs because that's one that's not a schedule that would be in conflict with the directive, yet a regulation, so we have one regulation that says employees must or, Federal agencies must send employee medical files to the WNRC sorry, to the national personal records center and you have this other stance that says we're not taking paper and right now that is the one area that has to be resolved Federal wide, so, I know that one is an issue that we're working on, but I don't have an answer as to what that position is going to be. So, that is of all of the blanket exceptions I can say very confidently there's no blanket exceptions except for employee medical files which is an issue we need to resolve so all of the regulations and guidance, OPM agencies align with the guidance that works for NPRC. And would say if any colleagues from NPRC or record center could clarify anything I just stated I would happy to be fact checked in realtime.

   So, that was the first part of the question. You said thank you, Chris.

   >> CHRISTOPHER PINKNEY: I was going to say no fact check required. I think it's a very nice summary of where we are with the employee medical files. So

>> LISA HARALAMPUS: That's difficult. Was there more to that Ari?

>> ARIAN RAVANBAKHSH: It was related. About innovating related to media neutral. I know that question was asked on the YouTube chat but also say reach out directly if we need to clarify that more for her.

There's another comment that has come in. I'm guessing this speaks to confidential levels in M1921 from Cindy's report. We can all discuss this. I'm guessing the reason confidential levels are down and organization, move from good intention plan, et cetera. To reality of funding and deploying actual systems.

>> LISA HARALAMPUS: Thank you. That was the YouTube comment from John Mancini. Always nice to talk you to, John, even though we're doing it across both space and time because I'm a little bit, I think, with the YouTube lag, I'm trying to make sure I stay up and have a good session that's somewhat back and forth. Yes, we solved the similar trend in 2016 and 2019 so, when I hear Cindy talk about what have we learned? We have seen the same pattern happen again and again. Agencies are reasonably confident they're going to make it and when it gets right to the deadline there's lower of that confidence and that's a pattern we see, it's expected the closer we get to that deadline. The agencies say the piece we delayed taking action on may be delayed a little more. I would hear what happens next year. That's right. Ari jumped to next year when we start data collection again in January and see what happens once we pass that deadline unless that deadline moves again. So, I'm still interested to hear what it says. Thank you for that.

>> ARIAN RAVANBAKHSH: Here's a related comment from John or another comment. Anyone else worried as digitization regs are being finalized that FAGI3 compliant claims from cell side trends will multiply and no clarity what this means in actual operations or at scale?

>> LISA HARALAMPUS: Thank you, well worded question, I appreciate it. Are we concerned? We are. That's why the standards themselves are broken. Reordered them to help them make clearer. What we want agencies to see, vendors already services to see, here's the general requirements, here's what you have to document. Here's what you have to do for quality management, here's what you do technically, and here's what you'll do for validation. Because it's how the standards are applied and validated, how quality is run that gives the technical standards any merit. Otherwise you issue technical standards all day long if you have confidence they have been applied well. So, I'm hoping that the wise heads, when they read this regulation, and see how we rate it out with the general requirements, the documentation requirements, the quality requirements the technical requirements and validation, will say, ah, I can do this. This part can be automated this part has to be done with the way the contract is put into place. So, we're hoping the quality management strength of the regs will help agencies who say you don't have to just take somebody saying, oh, I can do FAGI3 star, and ask, NARA regulations and have they done quality management with regard to FAGI3 star. We have worked with colleagues. Thank Arian who helped us, for those who may know, we worked with vendors and who are on GSA lists to create systems that are compliant with our standards. We are really looking forward to working with colleagues in GSA again to do something similar to make sure that vendors who are on GSA's lists as operating digitization services will understand and be able to say, yes, I can meet all of NARA's requirements not just the technical pieces.

So, I'm looking forward to having these continued conversations over the next several months.

>> ARIAN RAVANBAKHSH: Thank you, Lisa. Another question. This is maybe for Chris and his colleagues in FRCP. Is the FRCP advising Federal agencies customers to think twice before making a permanent withdrawal of records from FRCs due to OMB M1921.

>> This is art. I can take that. If you have record in the FRC right now. It might be advantage just to keep them there.

>> ARIAN RAVANBAKHSH: Fair enough and straightforward. Thanks, Art. Another question, I'll call on Lisa or maybe one of my other colleague, how soon will we be accepting the new updated Capstone lists due January 2023 and how quickly will they be approved?

>> LISA HARALAMPUS: I'll also start talking and give my colleagues a chance to jump in if they have anything to say, again to give context to this question we at the National Archives have said there's a new requirement for agencies to certify to resubmit the Capstone forms starting January 23rd. And I'm doing this I should have gone and read this so I can be sure I'm giving you the correct information and not something I have not looked at recently. So, January 23rd is the date that is the date you should start submitting requests. Our advice to agencies if you have an updated Capstone list and you're ready to share, you might as well hold on to it because we didn't want you to do the same work twice. That said, we should give more leeway. October 1st to the 31st you may want to do it. You may say, okay, I have this updated list and they can talk to you about when it would be best sent and what process they want to approve it. I would say again, in a broad brush stroke, if there aren't many changes, hopefully that means we go through the process relatively quickly. Even if you do have a lot of changes it is still going to go through the same process and shouldn't be that long to get them approved. We think we've got the Capstone schedule process. We know what we're doing, we have it practiced we know how to post it on the Federal Register, how to work with our teams so, be it big changes or small, I am sure they are acted on as quickly as possible.

But there's no set what I'm trying to say, there's no separate process for handling Capstone forms that I think I'm aware of. It still goes through all of the same steps, unless I'm wrong, in which case somebody please jump in.

>> ARIAN RAVANBAKHSH: So, this is another question that's come in through email. The delay in publishing the new standard and delay for fenders to ensure they are compliant will greatly impact agency's ability to meet the M1921 mandate to manage record electronically, don't you think? Agency yes.

>> LISA HARALAMPUS: Sorry I went off camera for a second in case that was for me. Yes, I agree that's a comment. Thanks.

>> ARIAN RAVANBAKHSH: We're running close to 3:00, so I will put a last call in for comments and questions. I note John Mancini said, thank you, Lisa for a great answer re: FADGI. Thank you, John. Here's one, I'm looking to obtain a copy of the latest digitization standards or bulletin. How would you advice somebody to find the latest?

>> LISA HARALAMPUS: The latest information on the digitization standards publicly available is the December 2020 version in the Federal Register for public comment. Everything else we've been working on to address those comments are

not publicly available. We wouldn't share them. Until they are approved they are not publicly available. We wouldn't share them. Until they are approved they are not worth sharing. That said, if you have a question about something, you can email rm standards and our team would be happy to talk to you about what we're intending. If you have a question, our 2020 regs said this, is this what you meant by that. Hopefully you can clarify it and we can answer the question that way or we'll be able to share. No, that is the latest information.

   Like I said, we are working on those regs and I hope to have them publicly available soon so we can do really dig dives into digitization standards for permanent records, hopefully soon. And, Arian, if you want to ask I'm going to stall for time to make sure I have the direct information about the January 23 date for Capstone submissions. I totally admit I was off for vacation for two weeks so I want to make sure you have the best and correct information.

   >> ARIAN RAVANBAKHSH: While you're looking that up, Lisa, we'll tackle another record. How long does NARA's permanent reported capture team have direct offers of hard copy permanent records from Federal agencies. I think what we'll do, Tommy, is pin it and get somebody to answer that and get back to you directly. I also want to point out that, we did mention the FRON meeting earlier in this call. Thanks for Matt for posting the date and time, that's Tuesday the 13th from 1:30 to 3:00. If you're interested in the FRON, that's when that meeting is.

   >> LISA HARALAMPUS: I'm back with one quick clarification. And I ask one of my colleagues if they could please drop a link to our Website where the AC memo, 4022 is, if you could post that link, because that is where we started talking about the Capstone recommission cycle, and we said in that bulletin, and I'm sorry if I confused anybody with the comment earlier, we suggested that we pause accepting submissions of new cap tone forms, starting August 8th. So, we are really trying to help agencies not have to do double work and help us not have to do double work. So, we are going to require agencies to submit new Capstones in January '23. I believe I asked my colleagues what date in January, because there was no date associated so I think that remains sorts of, January of '23 is open. You can send it January 3rd I think is the first Monday and not January 23rd, 2023. I think that was me getting my themes?   My head confused.

   So, the memo says I'm sorry, the AC memo which is communication to records officers and records contacts did not say what date in January '23, just that's the time we will start work on Capstone resubmissions.

   >> ARIAN RAVANBAKHSH: Thank you, Lisa, I dropped that memo in the YouTube chat.

   >> LISA HARALAMPUS: Thank you.

   >> ARIAN RAVANBAKHSH: So, has the GRS schedule for destruction of source documents for permanent record been approved and signed we are waiting to destroy the source document for public records that we made electronic. Thank you for your help.

   >> LISA HARALAMPUS: No, it has not been approved. Thanks for the question. That's part of the process. I don't have time to look it un. But I can say stay tuned to the blogs and records he emails. We will share it when the schedule is out for comment.

   >> ARIAN RAVANBAKHSH: Since we're at 3:00, I'm going to call it here. Can I have the next slide, please? The next slide is our next meeting, for more BRIDG, the next meeting of BRIDG is October 8th, at 1:30 p.m. So, thank you, all, for

attending today. Thank you, all, for the questions and comments and with that, enjoy the rest of your day. Thank you.

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