

AGENCY REVIEW OF NARA TECHNICAL REQUIREMENTS FOR PERMANENT ELECTRONIC RECORDS

Portable Document Format (PDF)

Please respond to the following questions by circling "yes" or "no". For each question where a "no" response is indicated, please attach supplemental information explaining how the question is handled in your agency.

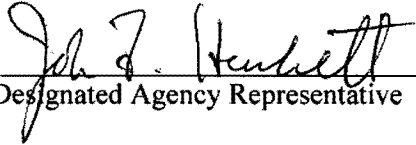
Upon completion please sign and submit to NARA with the proposed SF-115 for the related permanent electronic records.

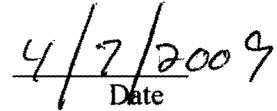
<p>Record Series/System: This is a general response for all Office of Director of National Intelligence (ODNI) PDF files, both permanent and temporary. Individual record series are described and PDF properties are dealt with individually in connection with specific Records Control Schedule items.</p>	
<p>1. Do the PDF records comply with PDF versions 1.0 through 1.4?</p> <p>All continuing systematic PDF conversion programs use or comply with recent versions of Adobe Professional, 1.3 or later.</p>	<p>YES</p>
<p>2. Are all PDF security settings limiting access deactivated?</p> <p>The general practice, and default, is to deactivate security settings. For those components that have activated the setting, ODNI Information Management is issuing guidance to correct that practice.</p>	<p>NO</p>
<p>3. Are all referenced fonts in the PDF records either included or embedded?</p>	<p>YES</p>
<p>4. Are the PDF records created from scanned images?</p> <p>The preponderance of PDF records created from scanned images is comprised of reference copies of paper record copies; in which case, the paper records are the permanent record copy.</p> <p style="text-align: center;"><i>If yes, please attach a completed Agency Certification form for scanned images of textual records.</i></p> <p>The Scanned Images of Textual Records Short Questionnaire is attached.</p>	<p>YES</p>
<p>5. Do the PDF records contain embedded files (e.g., attached word processing files) or form data?</p>	<p>NO</p>

<p>6. If yes, will this information be captured and transferred to NARA separately from the PDFs?</p>	<p>N/A</p>
<p>7. Are there finding aids and other relevant technical documentation associated with the records that can be transferred to NARA?</p> <p>Many files are indexed or otherwise described in associated lists, databases and tracking systems. However, there is no general agency rule prescribing the creation of such finding aids. Most PDF files of record copies of formal documentation are maintained in organized, structured electronic files that are essentially self indexed. Technical documentation of databases and tracking systems varies widely, but where essential to the continued accessibility of the permanent record, it is scheduled to be transferred with the record.</p>	<p>YES</p>
<p>8. Are there provisions for assuring the integrity and continued usability of the electronic records until they are ready for transfer to NARA?</p> <p>Assuring future integrity of and access to permanent records is a major ODNI objective as the Information Management staff proceeds with its program of inventorying records, counseling components on proper record keeping practices, and preparing Records Control Schedules. In keeping with this objective we issue guidance consistent with the language proposed in ODNI Records Control Schedules for permanent electronic records:</p> <p><i>Maintain electronic files in active system until no longer needed, copy to verified accessible format and medium as required for preservation and continued reference. Transfer to NARA when 30 years old in a medium and format acceptable to NARA in accordance with standards set forth in Federal regulations.</i></p> <p>In addition to the aforementioned efforts, ODNI recently has begun two major initiatives to establish file plans and build support for an electronic records management (ERM) system that is DOD 5015.2 compliant:</p> <ul style="list-style-type: none"> • Our ODNI Draft File Plan is nearly complete and aligns to the Federal Enterprise Architecture Framework. We have tested our file plan with several offices, applying it to their records on share drives and assessing how it links to disposition instructions in proposed Records Control Schedules. We have been pleased with the results. We will continue to roll out our file plan in the coming months. • We have made a compelling case for a corporate ERM system to our senior management and information technology (IT) staff. We have formalized an ERM Working Group to actively pursue the 	<p>YES</p>

acquisition and implementation of an ERM system. We are scheduled to present our requirements to the corporate IT board. Until an agency-wide ERM solution is available, we will continue our efforts to insert electronic recordkeeping requirements into the system development process. Certain ODNI systems that house some of its most important mission records virtually assure that the records will be properly protected from deletion or alteration. For example, electronic records posted to such repositories cannot be deleted or altered except by the system administrators.

Finally, every new employee to ODNI must participate in an orientation training session, which includes a briefing on records management. ODNI believes that with proper training, it has employees of the highest integrity who will do their utmost to obey both the letter and spirit of the records preservation provisions of the Federal Records Act.


Designated Agency Representative


Date