

AGENCY REVIEW OF NARA TECHNICAL REQUIREMENTS FOR PERMANENT ELECTRONIC RECORDS

Scanned Images of Textual Records

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 ODNI files, permanent and temporary, created from scans of textual records. Individual record series are described and document properties are dealt with individually in connection with specific Records Control Schedule items.</p>	
<p>1. Are the electronic records maintained in one of the four file format(s) accepted by NARA (e.g., TIFF, GIF, BIIF, PNG)?</p> <p>Many of ODNI's electronic records from scanned images are also in Portable Document Format (PDF). To ensure compliance to NARA's file format requirements on this issue, we are including our answers, per NARA's 3/31/2009 response, to NARA's PDF questionnaire. This acknowledges that we understand NARA's requirements for submitting PDFs as electronic records which are created from scanned textual records (i.e., not born digital).</p>	<p>YES</p>
<p>2. Do the electronic records meet NARA's minimum image resolution requirements?</p> <p>Most of ODNI's scanned documents inventoried and reviewed to date DO MEET NARA's requirements for the minimum image resolution as outlined in NARA's guidance¹. This guidance, per section 3.2, states that a resolution of at least 300 ppi (pixels per inch) is acceptable for bitonal, gray scale, and color scanned images. However, the ODNI Information Management (IM) staff has recently discovered that ODNI staff has access to some hardware/software scanning solutions that <u>may</u> be set at a default lower than 300 ppi. We state 'may' because many software programs and scanner interfaces commonly, but inaccurately, use the terms "ppi" and "dpi" (dots per inch) interchangeably. Currently all of the scanning solutions we have documented prompt users to scan in terms of "dpi" instead of "ppi." Using the general assumption that the conversion factor for a standard scan is 1 dpi = 1.5 ppi (assumes a 1:1 ratio with the original file with no attempt to reduce or enlarge the length and width of the original image), then ODNI users scanning at 300 dpi should result in an image that is at least 450 ppi; well above NARA's recommended standard.</p>	<p>NO</p>

¹ *Expanding Acceptable Transfer Requirements: Transfer Instructions for Existing Permanent Electronic Records Scanned Images of Textual Records.* The U.S. National Archives & Records Administration (December 23, 2002).

<p>To resolve these issues, the IM staff is:</p> <ul style="list-style-type: none"> • Working closely with the Information Technology (IT) staff to inventory the scanning solutions (hardware and software) across the agency so that IM staff can understand the solutions and provide the proper guidance to users; • Drafting requirements for IT, based on NARA's documentation, for the standards that current and new scanning solutions within the ODNI must meet to be compliant to NARA's standards; • Reviewing and commenting on any User Guides produced or used by ODNI staff for the use of specific scanning solutions; and • Creating outreach material (e.g., ODNI-wide user "Hot Tips") and instructional policy on the proper creation of scanned images of hardcopy records based on NARA's requirements. 	
<p>3. Are the electronic records maintained in an uncompressed file format?</p>	<p>YES</p>
<p>4. Are there finding aids and other relevant technical documentation associated with the records that can be transferred to NARA? Many records 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 scanned images from textual records 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>5. Are records of quality control inspections performed on the records available for NARA review? During ODNI's on-going records inventory, the IM staff is documenting the components that scan documents and the quality of the output that is generated from these efforts. During the inventory / interview process, IM staff:</p> <ol style="list-style-type: none"> 1. Recommend that ODNI staff perform their own scanning quality control checks; and 2. Provide general guidance on the quality control parameters (e.g., ensure straight pages, do not include blank pages, check for readability of grayscale and color images, proper image resolution defaults set). <p>The need for quality control will also be included in ODNI's outreach material (e.g., ODNI-wide user "Hot Tips") and instructional policy. Once ODNI has an Electronic Records Management (ERM) system in place, ODNI IM staff can conduct and document an audit on a random, statistical sample of scanned documents across the enterprise on a defined schedule. This will ensure that documents uploaded into the system meet quality control standards.</p>	<p>NO</p>
<p>6. Are there provisions for assuring the integrity and continued usability of the electronic records until they are ready for transfer to NARA? Assuring future integrity of and access to permanent records is a major ODNI objective as the Information Management staff proceeds with its</p>	<p>YES</p>

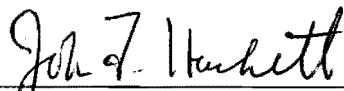
program of inventorying records, counseling components on proper record keeping practices, and preparing Records Control Schedules. In keeping with this objective we issue guidance consistent with the language proposed in ODNI Records Control Schedules for permanent electronic records:

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.

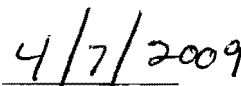
In addition to the aforementioned efforts, ODNI recently has begun two major initiatives to establish file plans and build support for an electronic records management (ERM) system that is DOD 5015.2 compliant:

- **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 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