



NARA Federal Electronic Records Modernization Initiative (FERMI)

Use Cases for Transfer

March 2021

Transfer refers to the process of NARA taking physical and legal custody of records that are identified as permanent and having historical value. These permanent records are kept by the creating agency for the period of time specified by their records retention schedule and then legally transferred to NARA. See the Electronic Records Management Use Cases Overview Appendix for definitions of specific record types.

Below is the list of use cases and associated business scenarios for transfer.

ERM.040 - Transfer of permanent records from recordkeeping system

- ERM.040.L1.01. Identify records eligible to be transferred, based on records retention schedules and disposition instructions.
- ERM.040.L1.02. Approve transfer of permanent records to NARA
- ERM.040.L1.03. Prepare records for transfer to NARA
- ERM.040.L1.04. Transfer legal custody of records from agency to NARA in accordance with their records retention schedules and with the preferred and acceptable file formats outlined in the "Transfer Formats" guidance. This transfer would be executed by an authorized user.
- ERM.040.L1.05. Enable a record to be kept of all record transfers, providing certifiable proof of transfer.
- ERM.040.L2.01. Extend the time frame for which an agency retains legal custody of permanent records to accommodate the order, law, or business justification.

CONSIDERATIONS FOR TRANSFER

The use cases and workflows are written from a high-level perspective and are intended to cover all types of transfer. The base level requirements for transfer are the same: permanent records must be transferred to NARA for permanent retention in approved formats with required metadata. However, agencies will have to take different approaches to transfer based on where the records were managed and how the records are scheduled. Agencies will have to work with NARA to transfer records with the tools and strategies in place at NARA at the time of transfer. Transfers may be done automatically, semi-automatically, or manually. NARA's goal is to move toward full automation of transfer.

The [Business Lifecycle and Business Capabilities](#) identify the Records transfer functions to include Records Transfer Eligibility, Records Transfer Action, Records Transfer Completion, and Permanent Records Retention Period Extension. Together, these activities provide record management controls to ensure the appropriate transfer of permanent Federal electronic records to NARA. As explained in the Electronic Records Management Use Cases Overview, agencies may take various approaches to managing their electronic records. They may choose to manage records in the platforms or systems in which they were created or import records into a records management application. No matter the approach taken, agencies should be able to manage the records from creation through disposition.

Agencies and vendors should consider the following when transferring permanent records to NARA.

- Transfer documentation is complete with all required information.
- Where permanent records are located at the time of transfer as they will have to take different steps to execute transfer. Agencies may have records in cloud platforms, shared network drives, or on-premise systems.
- How they will identify information access restrictions on the use and examination of records before transfer to NARA.
- How they will identify sensitive information within records that may require screening before the records are available to the public, e.g., personally identifiable information (PII), such as Social Security Numbers of living individuals, law enforcement sensitive information, and proprietary information.
- How they will remove technical restrictions to records, such as disabling passwords and file encryption and deactivating digital rights management (DRM) technologies, before transfer to NARA.
- How to export records in compliance with [NARA's Guidance for the Transfer of Permanent Electronic Records](#) and [NARA's Metadata Guidance for the Transfer of Permanent Electronic Records](#).
- How to export records from agency systems to ensure metadata remains consistent and migration doesn't cause issues, e.g. changing file names, consistent metadata, disrupting file structure, and other migration issues. See Records Express post for [Best Practices for File Naming](#).
- How to test exports to ensure they are complete and the metadata remains consistent, e.g. the file size of the export matches the original source.
- How to ensure temporary records and non-record materials are separated from permanent electronic records.
- How to ensure that all fonts necessary to interpret the information in each record are embedded when the files are created.
- How they are complying with any existing agency policies regarding the encryption of the physical media used to transfer electronic records to NARA.
- How to cull Capstone email before transfer to NARA (if applicable).

USE CASES FOR TRANSFER AND WORKFLOWS

ERM.040 – Use Case for Electronic Records Transfer

Enabling Function: Electronic Records Transfer

Note: The ERM functions affect every other Federal Functional Area in that all agency mission support activities create electronic records. The Enabling Functions provide support to other Functional Areas and should be combined into their use cases to reflect where records are created and how they are captured and managed.

Business Scenario(s) Covered

- ERM.040.L1.01. Identify records eligible to be transferred, based on records retention schedules and disposition instructions.
- ERM.040.L1.02. Approve transfer of permanent records to NARA
- ERM.040.L1.03. Prepare records for transfer to NARA
- ERM.040.L1.04. Transfer legal custody of records from agency to NARA in accordance with their records retention schedules and with the preferred and acceptable file formats outlined in the "Transfer Formats" guidance. This transfer would be executed by an authorized user.
- ERM.040.L1.05. Enable a record to be kept of all record transfers, providing certifiable proof of transfer.
- ERM.040.L2.01. Extend the time frame for which an agency retains legal custody of permanent records to accommodate the order, law, or business justification

Business Actor(s)

Agency Personnel, Business Process Owners of records, Information System Owner, Agency Records Management Staff, NARA Accessioning Archivists

Synopsis

Once records are deemed to have historical value, they are marked permanent and kept by the agency for a period specified in the agency records schedule. Once permanent records have met their retention period, the records enter the transfer phase. The permanent records must first be approved to be transferred to NARA; this includes identifying and preparing permanent records, notifying business owners of permanent records eligible for transfer, receiving approval from business owners, notifying the Agency Records Officer (ARO) of permanent records eligible for transfer, and receiving approval from the ARO to proceed with the transfer. The records must then be transferred to NARA; this process consists of identifying approved records for transfer, ensuring the records are in approved formats, exporting the records from agency systems, creating transfer documentation to accompany the transfer to NARA, and transferring the records and documentation to NARA. Lastly, the agency must dispose of the copies of transferred records once NARA confirms receipt and create a record of transfer. The agency must identify and locate

copies of records, and then dispose of them from their systems. The agency may need to extend the time frame for which they retain legal custody of permanent records to accommodate an order, law, or business justification.

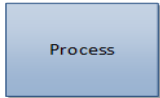

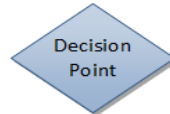

Assumptions and Dependencies

1. All predecessor events required to trigger the Initiating Event have been completed.
2. These events can be automated, semi-automated, or executed manually.
3. All the inputs listed in each event have been created or are available for use to execute the events.
4. There is a system or repository set up to manage an agency’s electronic records.
5. Agency transfer documentation includes all metadata required by NARA at the time of transfer.

Initiating Event

Permanent records have met their retention period.

Visual Workflow Key

<p>Rectangle</p>  <p>Process or activity</p>	<p>Arrows</p>  <p>Flow of activity</p>	<p>Diamond</p>  <p>Decision point, usually indicated by yes/no text</p>	<p>Oval</p>  <p>Start or end of a process</p>
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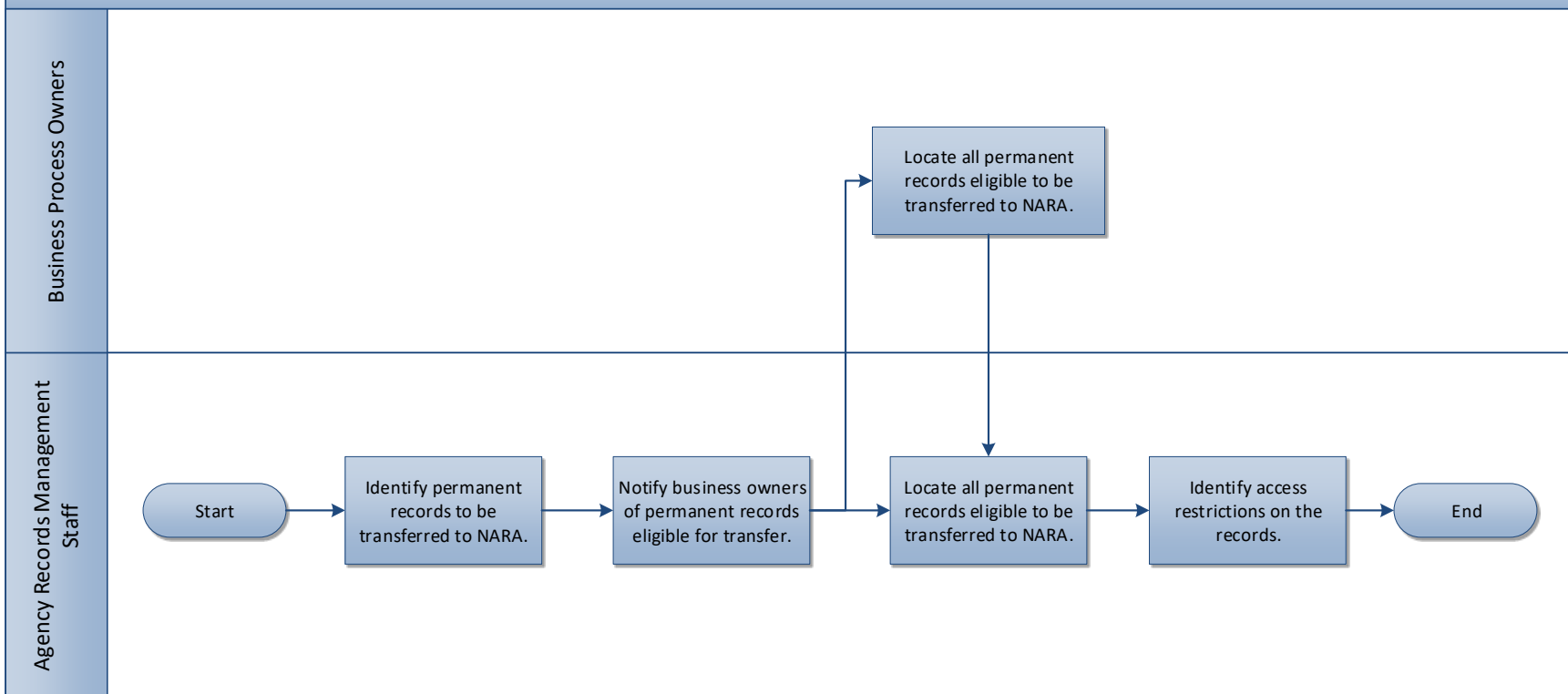
ERM.040 – ELECTRONIC RECORDS TRANSFER

Typical Flow of Events

	ERM Event	Input(s)	Output(s) / Outcome(s)
ERM.040.L1.01. Identify and prepare records eligible to be transferred, based on records retention schedules and disposition instructions.			
1	Receive notification from agency systems or perform a query to identify records eligible for transfer. (ERM.040.010 – Records Transfer Eligibility)	<ul style="list-style-type: none"> • Agency records schedule • Agency systems 	<ul style="list-style-type: none"> • Identified permanent records to transfer
2	Locate permanent records in all locations, including shared drives, recordkeeping systems, and cloud storage. (ERM.040.010 – Records Transfer Eligibility)	<ul style="list-style-type: none"> • Permanent records to be transferred • Agency systems 	<ul style="list-style-type: none"> • A list of all systems and the permanent records eligible for transfer.
3	Identify restrictions on the use and examination of records.	<ul style="list-style-type: none"> • Relevant statute and FOIA 	<ul style="list-style-type: none"> • List of permanent records to be transferred with access restrictions

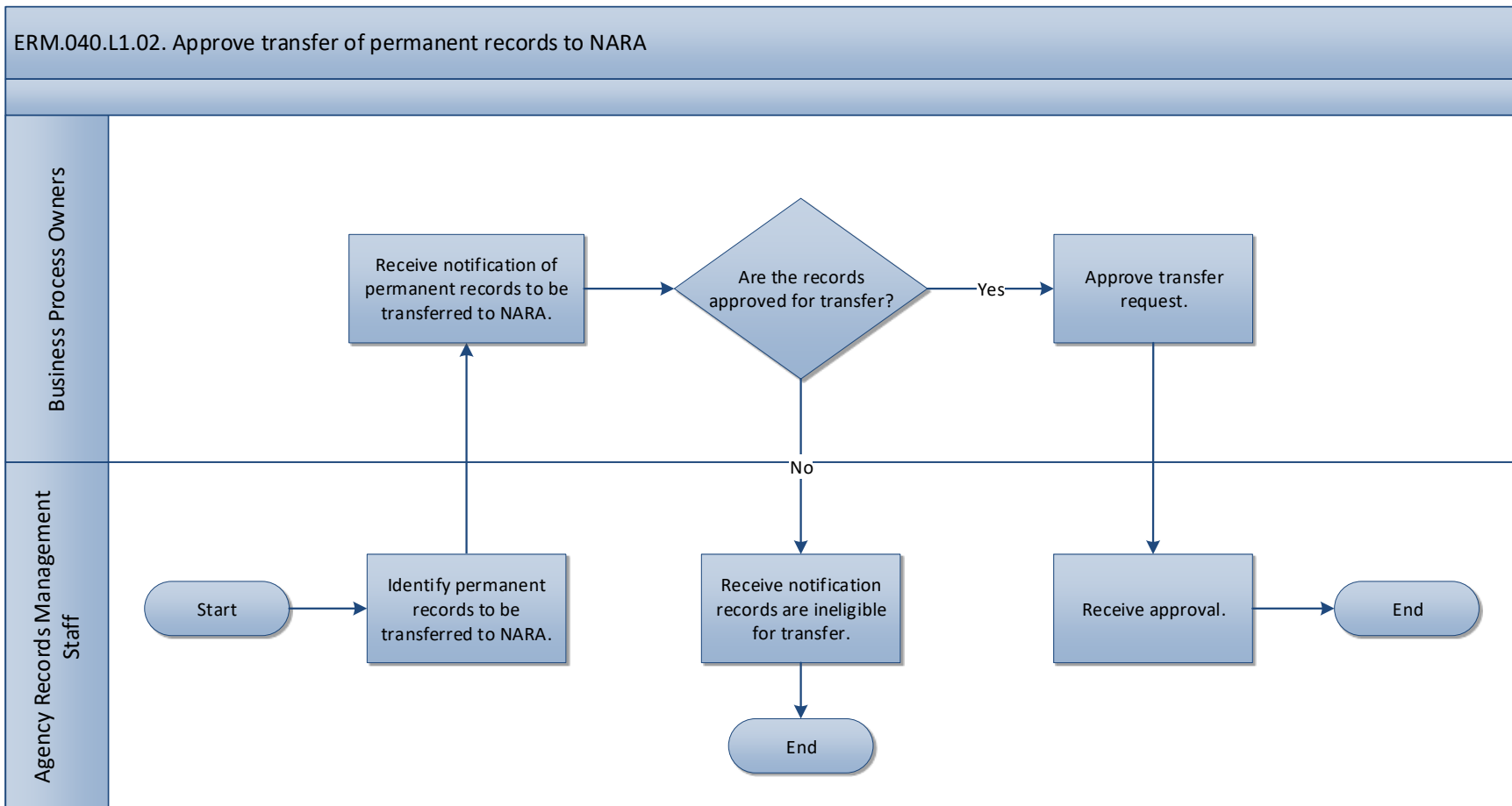
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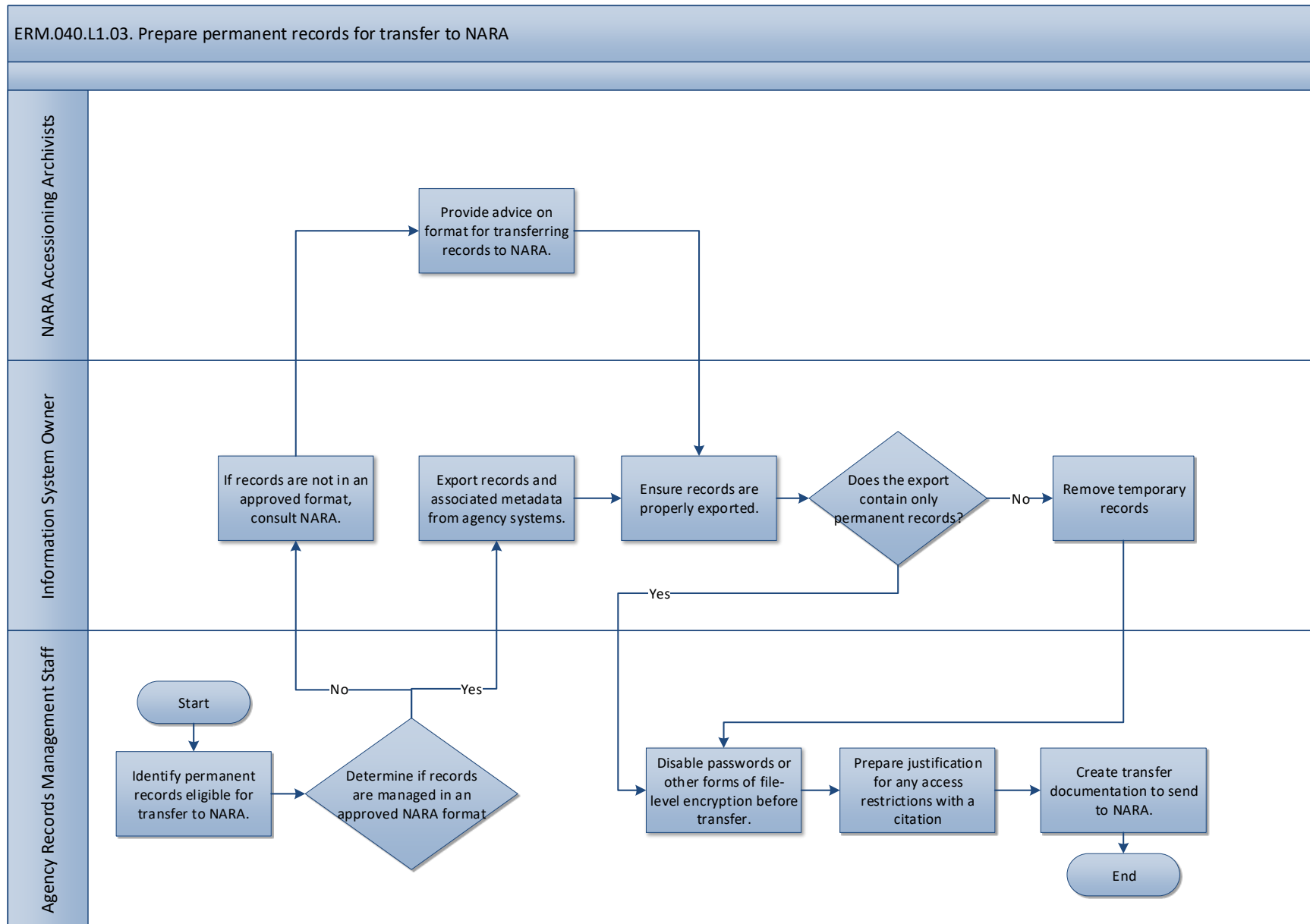
ERM.040 – ELECTRONIC RECORDS TRANSFER			
Typical Flow of Events			
	ERM Event	Input(s)	Output(s) / Outcome(s)
ERM.040.L1.02. Approve transfer of permanent records to NARA			
4	Notify business owners of permanent records to be transferred to NARA. (ERM.040.010 – Records Transfer Eligibility)	<ul style="list-style-type: none"> • Notification to business owners 	<ul style="list-style-type: none"> • Business owners are notified of permanent records for transfer
5	Receive approval from business owners to transfer permanent records to NARA. (ERM.040.010 – Records Transfer Eligibility)	<ul style="list-style-type: none"> • Notification from business owners 	<ul style="list-style-type: none"> • Permanent records approved for transfer by business owners
6	Notify approving official of permanent records to be transferred to NARA. (ERM.040.010 – Records Transfer Eligibility)	<ul style="list-style-type: none"> • Notification to approving official 	<ul style="list-style-type: none"> • Approving official is notified of permanent records for transfer
7	Receive approval from approving official to transfer permanent records to NARA. (ERM.040.010 – Records Transfer Eligibility)	<ul style="list-style-type: none"> • Notification from approving official 	<ul style="list-style-type: none"> • Permanent records are approved for transfer by approving official

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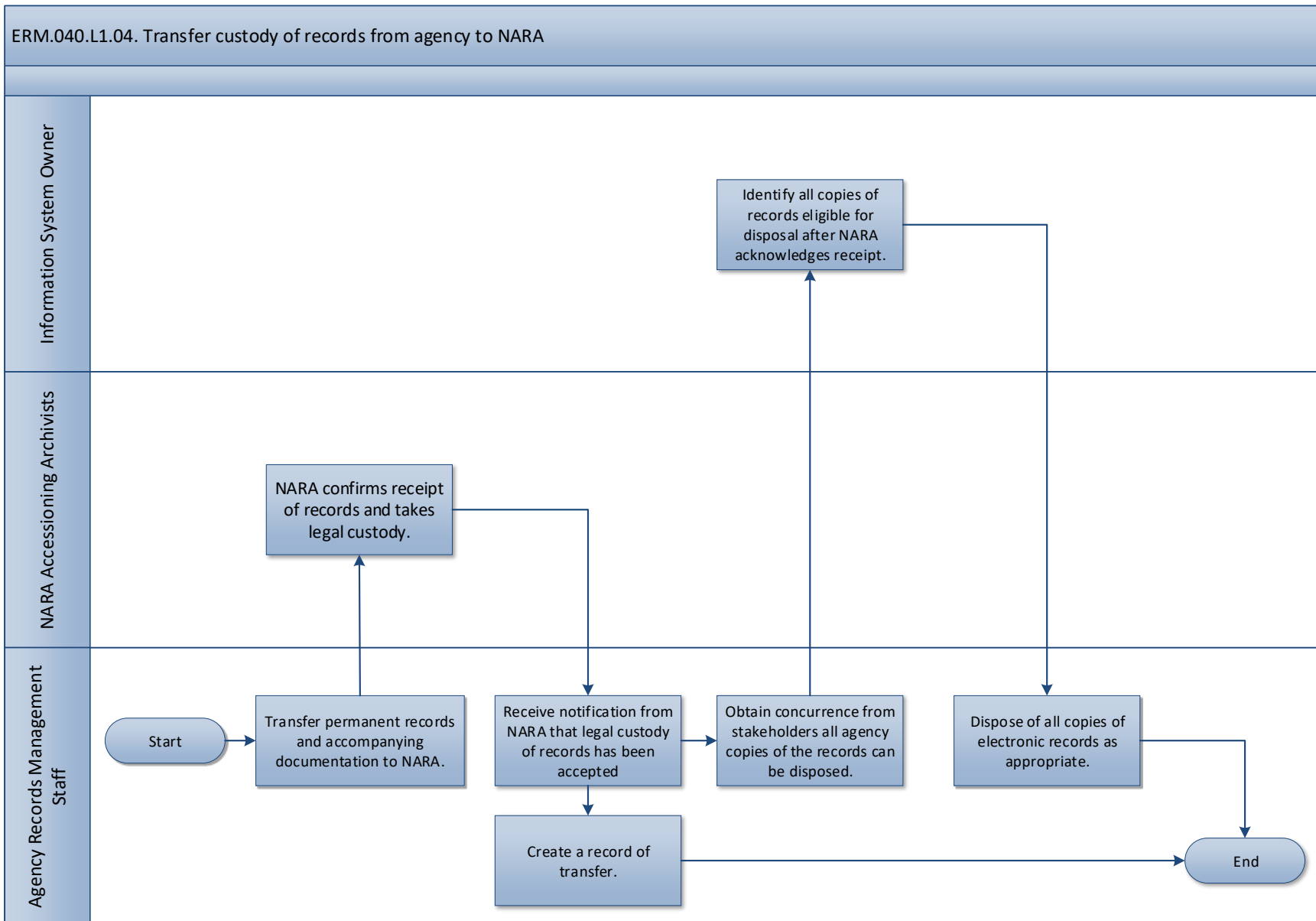
ERM.040 – ELECTRONIC RECORDS TRANSFER			
Typical Flow of Events			
	ERM Event	Input(s)	Output(s) / Outcome(s)
ERM.040.L1.03. Prepare records for transfer to NARA			
8	Identify approved permanent records to be transferred to NARA. (ERM.040.020 – Records Transfer Action)	<ul style="list-style-type: none"> Agency systems 	<ul style="list-style-type: none"> Identified permanent records
9	Ensure permanent records are in approved formats for transfer to NARA. (ERM.040.020 – Records Transfer Action)	<ul style="list-style-type: none"> NARA transfer guidance 	<ul style="list-style-type: none"> Permanent records are in approved formats
10	Ensure records to be transferred contain only permanent records with no interspersed temporary records (1235.46(d)(2))	<ul style="list-style-type: none"> Permanent records are in approved formats 	<ul style="list-style-type: none"> Confirmed permanent records
11	Export permanent records from agency systems with all necessary metadata to maintain content, context, and structure of the records. (ERM.040.020 – Records Transfer Action)	<ul style="list-style-type: none"> Agency systems Permanent records 	<ul style="list-style-type: none"> Permanent records are exported from agency systems
12	Disable passwords or other forms of file-level encryption that prevent access to records before transferring permanent records to NARA. (ERM.040.020 – Records Transfer Action)	<ul style="list-style-type: none"> Agency systems Permanent records 	<ul style="list-style-type: none"> Password removed from permanent records
13	Prepare justification for any specific access restrictions to the records with a citation to the statute or Freedom of Information Act (FOIA) exemption (5 U.S.C. 552(b) as amended), that authorizes the restrictions. (ERM.040.020 – Records Transfer Action)	<ul style="list-style-type: none"> Statute or Freedom of Information Act (FOIA) exemption Permanent records 	<ul style="list-style-type: none"> Justification for access restrictions to permanent records to be transferred
14	Create transfer documentation, including associated metadata, to accompany permanent records to NARA. (ERM.040.020 – Records Transfer Action)	<ul style="list-style-type: none"> NARA transfer guidance 	<ul style="list-style-type: none"> Transfer documentation

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ERM.040 – ELECTRONIC RECORDS TRANSFER			
Typical Flow of Events			
	ERM Event	Input(s)	Output(s) / Outcome(s)
ERM.040.L1.04. Transfer legal custody of records from agency to NARA			
15	Transfer permanent records and accompanying documentation to NARA. (ERM.040.020 – Records Transfer Action)	<ul style="list-style-type: none"> Exported permanent records Transfer documentation 	<ul style="list-style-type: none"> Permanent records are transferred to NARA
16	Receive notification from NARA that permanent records have been received and legal custody has been successfully transferred to NARA. (ERM.040.030 – Records Transfer Completion)	<ul style="list-style-type: none"> Receipt from NARA that permanent records have been received 	<ul style="list-style-type: none"> Legal custody of permanent records is successfully transferred to NARA
17	Identify and locate all copies of permanent records that were transferred to NARA. (ERM.040.030 – Records Transfer Completion)	<ul style="list-style-type: none"> Agency systems 	<ul style="list-style-type: none"> All copies of permanent records are located
18	Obtain approval from designated approving officials for disposal of agency copy of records based on current business needs and priorities, including any legal holds. (ERM.040.030 – Records Transfer Completion)	<ul style="list-style-type: none"> Notification from designated approving officials 	<ul style="list-style-type: none"> Concurrence from designated approving officials
19	Dispose of copies of permanent records that were transferred to NARA. (ERM.040.030 – Records Transfer Completion)	<ul style="list-style-type: none"> Agency systems 	<ul style="list-style-type: none"> All copies of permanent records are disposed
20	Create a record of each record transfer to provide proof of transfer. (ERM.040.030 – Records Transfer Completion)	<ul style="list-style-type: none"> Notification from business owner or ARO 	<ul style="list-style-type: none"> Create record in agency system of completed transfer

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ERM.040 – ELECTRONIC RECORDS TRANSFER			
Typical Flow of Events			
	ERM Event	Input(s)	Output(s) / Outcome(s)
ERM.040.L2.01 Extend the time frame for which an agency retains legal custody of permanent records to accommodate an order, law, or business justification			
1	Receive notification of order, law, or business justification to retain permanent records past their disposition date. (ERM.040.040 - Permanent Records Retention Period Extension)	<ul style="list-style-type: none"> • Notification from business owner or ARO 	<ul style="list-style-type: none"> • Change retention period in agency systems
2	Notify NARA in writing of need to retain records past their disposition date. (ERM.040.040 - Permanent Records Retention Period Extension)	<ul style="list-style-type: none"> • Notification from ARO 	<ul style="list-style-type: none"> • Notification to NARA
3	Receive written approval from NARA to retain records past their disposition date. (ERM.040.040 - Permanent Records Retention Period Extension)	<ul style="list-style-type: none"> • Notification to NARA 	<ul style="list-style-type: none"> • Approval from NARA
4	Extend the retention of legal custody for permanent records. (ERM.040.040 - Permanent Records Retention Period Extension)	<ul style="list-style-type: none"> • New retention input into agency systems 	<ul style="list-style-type: none"> • Retention period changed

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ERM.040.L2.01. Extend the time frame for which an agency retains custody of permanent records to accommodate an order, law, or business justification

