NARA's Regulation for Digitizing Permanent Records

June 6, 2023


Ladies and gentlemen, welcome.  Thank you for joining today's NARA's

regulation for digitizing permanent records webinar.  Please ensure you have

opened the Webex chat panel by using the associated icon on the bottom

right-hand corner of your screen.  Please note all your connections are currently

muted.  This conference is being recorded.

    You may submit written questions throughout the presentation.  These

questions will be addressed during the Q and A session.

    To submit a written question, select all panelists from the dropdown menu in

the chat panel, answer your question in the message box provided and send.

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With that, I will turn the webinar over to Arian Ravanbakhsh.  Thank you.  Please

go ahead.

>> Welcome to our webinar on the regulations for digitizing permanent records.  I

will be serving as the moderator for today's webinar.  First, some housekeeping

information.  The presentation slides we will be using are available on our

website.  We will place those in the chat.  When we have the recording available,

we will be posting this to our web page as well as our YouTube channel.  A

Summary Judgment of this webinar and all relevant links will be posted on our

blog records in records express in the coming days.  You can find a series of

posts with additional information about these regulations.

   For questions during the presentation this afternoon, please use the chat

feature as Michelle described.  We will be addressing those questions after the

presentation.  With that out of the way, I would like to introduce the chief records

officer for the U.S. government, Laurence brewer.

>> As he said, I am Laurence Brewer, the chief records officer.  I am really

excited to welcome all of you to this webinar.  I cannot believe the numbers are

still climbing whereas by my count on my screen, 640 attendees.  By the end of

this webinar, we may end up setting a record in terms of attendance to one of the

webinars that we have hosted.

   Thank you so much for tuning in.  We have a lot of really good information to

share with you.  Before we get to our speakers and introduce them and get to the

program, I wanted to tell you all just given how many years and how much time

and how much effort has gone into getting to where we are right now, which is

having NARA's regulations door digitizing permanent records in effect, how much

has gone into this.  It has really been a story of doing a lot of work to get this really watershed, critical standards out for all of you to use.

In one sense, it is a story about persistence, because it has taken us so long to get here.  I want to thank all of the speakers today and everyone on the team for all their contributions over many years to get us to the point and sticking with it and getting us across the finish line.

This is also a story about patience from all of you.  We know for years and years, you have been waiting.  We are finally at the point where we have these standard and can talk about them in final form and really roll up our sleeves now to get to the really critical part, which is implementation in making sure that all of us, our agencies, our vendor community, are all fully wear of what we need to do and we're doing it as effectively as we possibly can.

So for all of that, my thanks.  For all of you, we really appreciate you attending and we encourage you to ask questions.  Drop them in the chat.  We will have time, hopefully, at the end to answer some questions.

We have some very really important information to share, which is where we are going to begin.  With that, we're going to flip the slide and I'm going to turn things over to Lisa Haralampus and the team of speakers we have for you today

to start talking about digitizing permanent records.  Thank you, again, for attending.

>> Thank you, Laurence.  I appreciate those kind words.  I think patience and persistence are two great words to describe the path we are on today, that got us to where we are today.  Patience and persistence are the hallmarks of where we'll be going next.  We know the regulations for many people was really the first step in what is now a process of implementing these regulations.

So I'm Lisa Haralampus.  I'm the Director of Records Management, Policy and Outreach.  I work for Laurence in the office of the chief records officer for the U.S. government.

Joining me as speakers today are two of my colleagues, John Martinez and Kevin.  I will let them introduce themselves as well.

>> I am John Martinez.  I am supervisor of the policy and standards team.  Our team works with Lisa's programs and we are within the office of the Chief Records Office.  I am supervisor of the team that developed this.  One of the experts is here with us today, Kevin, who is going to introduce himself next.

Let me pass it to Kevin.

>> I am Kevin De Vorsey, an electronics policy analyst and work for John and Lisa and Laurence and have been involved in the development of this regulation

as well as other guidance that we put out relating to transfer of permanent electronic records.

>> Thank you. So the three of us today are going to cover our presentation. Our goal is to provide familiarity and awareness. I know there are probably a lot of questions that are going to come.

How do I implement? We'll answer those to the best of our ability. At this time, please know we'll be working on more products that we'll be sharing over the upcoming weeks and months. I'm saying this now. I'll say it again at the end of the presentation. So our hope is at the end of our presentation today, you'll have this understanding, this familiarity, will know what's in the digitization regulations and we'll take any of your questions towards the end.

Let's get started.

Next slide, please, slide three.

I will say keep sending us questions. One of the questions we have already had is how do I get access to these slides? They are posted on our website. So we'll drop in the link again. Thank you, Andi. We just dropped in the link again. If you want to follow along or see the slides or have a copy for you, they are already available.

Let's talk about how we got here.  I'm going to cover in the beginning, do a little scene setting and provide a little bit of context.  We've written these digitization regulations for a specific purpose, so that agencies can take analog records, source records, originals, digitize them, and send those digitized versions to NARA to serve in the place of the original records.

The originals or the source records will then be disposed of, destroyed.  That is the whole guidance approach that we have built the framework on.  That came from quite a few places.

Starting in November of 2014, when the federal records act was amended by congress and signed into law, it told us -- that's the first quote you are seeing on the screen -- that we should do regulations.  That was clear.  It wasn't going to be a different type of guidance.  NARA wants to do regulations for reproducing records using digital processes.  We had already had the regular laces on photographic and micro graphic.  That wasn't new.  The new was do the digital process with the view to the originals.  In 2018, NARA issued a strategic plan that said we are going to issue regulations and clear policies.  I hope these policies are clear, that permit agencies to digitize records and where appropriate dispose of the originals.

Then, we have two hallmark pieces of guidance, OMB and NARA signed joint memos that talked to the entire government about the importance of transitioning to electronic records management.

Each one of those memos, they said, NARA will issue regulations that provide standards for digitizing images and disposing or destroying the original analog records.

That's our philosophy. There are many reasons agencies have digitized records over time. They may have digitized for better access, for reference, to put them into a system to have a complete set of information to take actions on.

These records, this guidance is set up, again, so that you can digitize records and send those digitized versions to NARA.

Next slide, please. So how did we get here? That's what we were told to do. The question is, how did we get here? I just wanted to share the review process as a way of providing some context into what you've seen in the past and what you are seeing now.

So nothing -- it is a little history lesson. You will have to forgive me. We are archivists. We like to talk about our history. Starting in 2004, we got those requirements. At that point, we were actually very much focused on e-mail.

Remember e-mail, e-mail management.  We were doing a lot of work.  We started our planning and then we started our drafting and yada, yada, yada.

The first piece of digitization guidance we issued was in 2019.  That was the digitization standards for temporary records.  So we kind of thought we covered the majority of what agencies produce when they are digitizing records with those temporary record standards.  John is going to talk about them a little bit.  I won't steal his thunder.

Once we have the temporary records, we were also starting to work on the more technical digitization standards for permanent records.  Back in May of 2020, through the regular regulations process, OMB sent out the draft standards to its regulation liaison officers and federal agencies.  Because we are NARA and we have a close relationship with federal regulations managers, we sent out the drafts to our points of contract hoping that the regulations liaisons and records officers would meet together and respond with their initial comments to our initial drafts.

Boy, did you ever.  I have to say, every single round of comments, as Laurence said, be patient and persistent.  We patiently worked through the comments, created a draft, went through the process.  In December of 2020, it

was posted for public comment.  Again, we got so many comments from various members of the public and agencies again.  I say various members.

We had academics commenting.  We had watchdog groups commenting. Different people provided us a lot of context.  We took those comments and readdressed them.  That went to review to a certain number of select agencies.

Basically, our office of -- not OMBs office, but information regulatory affairs, said, you have made substantive revisions.  We'll send this back to the agencies that commented.  They gave us comments.  We did it again, got more comments.

We had a lot of back and forth.  What you are seeing now is different than what we saw in 2020.  Then, the miracle happened.  We got them published as a final rule.  We finished all the processes, got all the signatures.

On May 4th, they were published.  I'm double-checking my calendar.  Two days ago, on June 5th, the regulations are now done.  Done?  But are they really done?  They are done.  Now, that is how we got here.

If you go to the next slide, please.  Remind myself what's on the next slide. The regulations, there was more in those regulations than just digitization standards.  If you read the whole package and said, there is a lot in here.

The digitization standards for permanent records are in Subpart E, E for excellence, excellent regs.  Subpart F contains metadata that is needed when agencies transfer permanent records to NARA.

One of the comments we got back as we were doing our regulations was the importance of having transfer metadata.  They are going to be transferring large sets of digitized records.  We need transfer metadata.  You need transfer metadata no matter when you send records to NARA or how.

We put that in its own Subpart.  Out of the digitization regs in Subpart E, came Subpart F.  We also had hanging along for the ride for those entire four years a set of regulation changes that have nothing to do with digitization.  It was the 1225.22A.  We have a new regulation that says agencies must review all of their schedules at least once every five years and that should include schedules that are ten years or older.  The clock on that reg started two days ago.

In five years, we will see how that review has gone and what sort of guidance we need to help people with and what that review looks like.

That's in there.  That's in the regulation package.  If you have questions about that, that's fine.  Neither of those two things will be our focus today.  Next slide, please.

That's my context and my setting.  Now, I'm going to turn it over to John and Kevin to talk about the standards, themselves.

>> Thanks, Lisa.  So we're going to start, as Lisa mentioned, we are going to take sort -- start by taking sort of a step back to talk about the digitization standards of temporary records.  Why are we starting the discussion on temporary?  Just to emphasize where we started with this and that the regulations as published are for permanent, obviously.

I think Lisa mentioned the regulation for digitization of temporary records was the first to be issued in 2019.  You can see here on the slide the short list of the contents of the regulation for temporary.  It is a very brief set of requirements on its own, especially compared to the standards for permanent records.

It is probably much less than a printed page in the CFR.  The requirements for temporary are also at a much higher level, which gives agencies the flexibility as well as the accountability to ensure that their permanent records are digitized to an appropriate standard for your business needs.

The high-level requirements for temporary are to capture all the information contained in the original source records to ensure that you can use the digitized versions for the purposes the original records served.  The ability to protect them against unauthorized alterations, to digitize versions and to ensure that you can

locate and retrieve, access, and use the digitized versions for the records' entire retention period.

Again, agencies have latitude on how to implement these requirements. Agencies need to meet the thresholds in each area and ensure that those digitized versions can serve the same purpose as the original versions.

The temporary regulation introduced the requirement that agencies, the term validate, that agencies validate the digital records that they create and that they comply with the regulation before destroying the source records, the original records that you digitized.

Validation means that you validate the digitized versions are suitable quality to replace the original source records, document your validation process, and that process, again, for temporary records, the validation process agent. Agencies have latitude. They can establish their own process to validate those digitized versions and comply with the requirements in this Subpart.

In 2019, we also issued a frequently asked questions documents posted on the website. Obviously, an FAQ about NARA's digitization regulation. We'll be doing an update to that actually as part of the series of additional products producing to support the permanent reg. Next slide, please.

Moving to the standards for permanent records, this first slide those the sections of the regulation for permanent. As we said, obviously, this is more requirements and goes into much more detail than the regulation for temporary records. This is a higher threshold, because these are to create the requirements in this regulation are to create digital versions that are going to serve the same purpose as the original, ultimately be transferred to the National Archives and the original paper will be destroyed. That's aren't just technical specifications. It is a holistic approach, including important processes for records management, documentation and quality management as well.

It goes beyond sort of -- it goes beyond questions like what resolution do I do or what file format do I use? It is about -- we tried to make it sort of a total quality management approach to ensure completeness, use ability, and to create digital version that is can serve the same purpose as the original.

Next slide, please.

The first part I can talk about is the scope section. The scope addresses the types of materials covered by the regulation. You can see on the slide the first part talks about it is applicable to records that can be scanned using reflective techniques, meaning the digitization process means that light bounces off the surface of the document being digitized. For this, we applied an 80/20 rule. We

figured this would be the 80%, paper records, all sizes and types, printed photographs, photographic prints and as part of this we also addressed mixed media records.

What's not in the scope is things like photographic negatives, motion film picture films, micro forms and audio video records.  That will be the next regulation we work on.  The scope also addresses how the regulation establishes the process and requirements to ensure that agencies can identify the records that you are going to digitate for each project.  How to account for the records covered by the project and how to implement quality management techniques for things like verifying your equipment performance and to monitor the processes to detect and correct errors, and to produce complete and accurate digitized records, again, that the agency can use for the same purpose as the original source records.  The scope also discusses validation, validating that the resulting digitized records meet the standards in this Subpart.

Again, talking about what's not in the scope this was a question we got a lot. Lisa was talking about the comment periods we had with the public and agencies.  One thing we mentioned that is not in the scope, it does not require that optical character recognition be performed, OCR.  We got a lot of questions about OCR.  It is not a requirement in the digitization regulation.  By the same

token, obviously, it doesn't prevent agencies from performing OCR if there is a business need.

It also doesn't address -- we also don't address other applicable laws and regulations governing documents or digital files.  In other words, if it is addressed elsewhere, we didn't repeat it in here.  This purely deals with the digitization process.  We don't address things like handling of classified, CUI questions, compliance with Section 508.  For those areas, obviously, the agency should work with their legal counsel and other officials to ensure compliance where applicable with these and other requirements.

We also don't address other business needs or legal constraints that an agency may have that make unnecessary to retain source records for a period of time after digitizing and the same thing.  We advise working with legal counsel and appropriate officials to determine if the retention question related to rights and interests, litigation holds, similar reasons.  That's an internal discussion and determination.

Again, mixed media is included.  It is not uncommon for other media types to be co-located with paper records, a CD, heaven forbid, a floppy disk may show up interspersed with your paper records.

We'll talk more about mixed media considerations in depth a little bit into the presentation.

Next slide, please.  The next section is about records management.

As we said, this regulation includes important processes as part of digitization work as well as the more technical requirements and specifications.  It's important to establish intellectual control first over the records to be digitized.

This section talks about how you want to inventory the records to ensure that records are prepared and indexed and maintained in their original order.  That you survey the source records for any potential preservation problems, make sure you are selecting the equipment that is going to be able to safely digitize those originals.  It discusses identifying the age, the media types, dimensions, required level of detail, and again the condition of the source records prior to digitization, again, to make determinations about will there be an impact on the image captured techniques you use, the equipment you select.

You look at things like the type of paper, the type of printing, or the size of the records and see if those have an impact on what kind of decisions or equipment you are going to use to digitize.

You also want to identify and note if there are any missing records or any records that can't be digitized.  You'll use that information.  Part of the reason you

are documenting this, you are going to use some of this information at the time of transfer, to population the note section of the ERATR, when it comes time to transfer them to NARA, the digitized versions to NARA.

This part also talks about capturing relationships. Any relationships must be captured as part of the digitization process. For example, are there case files that are associated which case number. Are there multiple documents stapled together? What is the relationship of one folder to other folders in the box?

You capture those relationships through metadata. We will talk more about it later in the presentation, more about metadata or by using file formats that allow for multi-page files such as PDF or TIFF. During the digitization process, you need to ensure there are appropriate safeguards for the source records to prevent loss or damage and to minimize the risk of any unauthorized additions or deletions or alterations to the digitized versions.

Next slide, please.

This next part is about documentation requirements. Agencies must create digital documentation when digitizing permanent source records. The documentation will be maintained along with the digitized records until the records have been transferred to NARA and NARA notifies if the process is complete.

Disposition of documentation is done in accordance with the appropriate general records schedule, GRS or agency records schedule.  Again, this documentation will help the agency, some of the information here will help populate parts of the transfer request instrument, the TR and ERA.

We got a lot of questions also during this about, what is NARA's role in looking at it?  Does NARA inspect this documentation?  Most of the questions were, at the point of transfer, is NARA going to require it, review it?  The answer is, no.

The one area where NARA may ask to see the documentation is from the office of the Chief Records Officer, the oversight teams.  When they do an agency inspection, they may review document as part of one of their site visits.

You must create several documents when digitizing permanent records and maintain them with the digitized versions.  When is the defined plan?  That addresses the records unit and file to digitize.  The method that will be used to name them, the date range, if there are missing pages, any gaps, the estimated volume, the media type, dimensions, the equipment and software you are using, the estimated file storage requirements, access and use restrictions, the method used to capture relationships, which we talked about, and any metadata.

We have metadata -- we'll talk about metadata later.  If you have any metadata element labels that differ from those specified, we will ask you for a crosswalk as well.

Another piece of document we will require is a quality management plan. Kevin is going to talk more deeply about quality management and quality control. At a high level, it describes the policies, the functions, the roles and responsibilities and requirements and objectives of the project and the quality control component addresses inspecting image and metadata quality and corrective actions to ensure that the record, digitized versions, conform to your requirements.

Like I said, that's coming up next.

Additional documentation as well could be any information needed to associate the digitized records to the source records, the agency record schedule.

If there are any additional related finding aids or indexes or inventories metadata schemas that are used to find the record, capture that and keep it alongside as well.

Next slide.

Like I said, we are moving to quality management and other areas.  I'll turn this over to Kevin.

>> Thank you, John.  So as John mentioned for the documentation, you will be capturing information about quality management.  Here, we are using quality management as an umbrella term under which there is quality assurance and quality control.  Throughout this, if you read the reg, you will see reference to something referred to as FADGI, the Federal Agencies Digital Guidelines Initiative.  We are very fortunate it exists.  It is a group managed by the Library of Congress that NARA has participated in for about 15 years.

What FADGI has done is work with the vendor community to come up with the image science for how to accurately record information from paper or film so that you have assurance that digitization is being done properly.

So the quality management in this regulation is very similar to that in FADGI.  It may be a little bit different from quality management you have done in the past if you have digitized and you go through your project and do random sampling at the end.

Here, it is a total quality management process, interwoven into everything.  So when we talk about quality assurance, that includes working with your vendors to ensure the equipment you purchase or rent is appropriate, one, for the material

type.  If you are using 8 1/2 by 11, modern office paper, then high-speed -- may be appropriate.  If you are dealing with onion skin or something more fragile, you will want to find equipment appropriate for that.

Then, the quality control includes actually the testing and analysis of your equipment and periodic inspections throughout the process.

That helps kind of relieve that burden.  You don't want to get to the end where you have digitized large volumes of material and discover errors and have to pull the paper again and start over or send them back to your contractor.

It helps identify malfunctioning equipment.  If you set up your software incorrectly, metadata improperly or other human errors, which I am personally guilty of having committed in the past.

This quality management approach is quite lengthy.  There is a lot there.  It is a part of FADGI and created to make digitization more important.

I have mentioned FADGI and that quality management is int woven.  On the screen is one of the test targets that was developed.  It is part of what they referred to as the Digital Image Conformance Evaluation or DICE process.  By scanning this test target and then analyzing the results of that scan with the DICE software, you can actually determine if your equipment is capable, one, of achieving the parameters in this regulation.

As you continue to digitize, make sure that nothing has gone wrong.  The lamp hasn't failed or a mechanism isn't working the way it was when it was new. It analyzes the colors for accuracy.  Then, it also measures the resolution. Unfortunately, just setting your resolution for 300ppi does not guarantee your equipment is capturing 300ppi.

It is wonderful that we have the FADGI process to rely on so we didn't have to come up with other quality assurance mechanisms.  Next slide, please.

File formats.  As John mentioned, throughout this, we are balancing the cost to agencies and then the archival needs of the National Archives and researchers in the future.

We are mindful there are lots of different agencies doing lots of different types of digitization.  So we've tried to give options both in terms of file form mats as John mentioned.  If you are scanning a case file and you want to keep material together, packaging it in a PDF may make sense to you.

If your doing other types of digitization, that may not be a requirement.  What is novel to this regulation is we have included several types of compression, deflate, also known as Zip and JPEG2000 compression.

One thing the agencies should be aware of, and this is coming from FADGI's latest guidelines, we are allowing up to 20:1 visually lossless compression.

That's with the requirement that if you do that, there is no degradation or negative impact on the resulting images.

That may be of interest to agencies if you are doing very high volumes where file size and storage concerns are going to be something you are looking at.

We would encourage you to work with your vendors to test and kind of select from these what's going to best fit your needs.  Next slide, please.

1236.50 is the actual digitization requirements.  These, again, are extracted from FADGI and modified to meet requirements of federal agency digitization.

In the FADGI world, they line up with what's referred to as FADGI 3 star.  There are two major subcomponents, the actual parameters.  One is for permanent paper.

As John discussed the scope, we were trying to be able to account for as much material as we possibly could.  Since the type of equipment that's used is common, types of quality control are common, we were able to include printed photographs.

So the actual parameters are a little bit different.  There are these two sections detailing what parameters apply to each.  As I said earlier, the equipment that you select should be appropriate for the material that you have.

Make sure before you contract or purchase that it's actually capable of meeting the requirements in this regulation. Implement the quality analysis that was described earlier in the quality management section and continue to test throughout the process so that you catch any mistakes early and can correct them.

The next slide, please.

Mixed media. As John mentioned, we recognize that when you pull boxes of what you think are paper record, it is not uncommon to find other physical storage device or media inside a box with paper. The expression mixed media actually refers to record files that exist on different media.

You may have a medical file and then an x-ray. We've included instruction force that case where you discover related permanent records in your box. They just happen to be on some other media that you're not able to digitize at this time. Also, instructions in case you find a thumb drive and there is other material on it that is not related to the paper record.

That's because part of the record management is there is an obligation to treat all records appropriately. There are instructions to analyze those materials to see, are these federal record. Do they belong in another records series or do

they relate to what is in the contents of this box in that's just to assist agencies to avoid either missing or failing to digitize or properly account for all their records.

Could we go to the next slide, please?  Metadata.

Obviously, metadata is an important aspect of this process.  As has been said repeatedly, especially with the permanent records, the resulting digital files are going to be required to stand in place of the source records.  Since the documentation that is created by agencies is not going to be transferred to NARA, these files need to have all of the information that they are going to need for researchers, agencies and the National Archives to be able to manage them appropriately and then discover them and interact with them.

As you can see, we have administrative metadata to assist in the management.  That includes the disposition and item number.  There is also requirements for descriptive metadata, which relates to the source record.  Since the source records are going to be destroyed at the end of the process, they are not around for researchers to refer to, there is this metadata which describes the source records so that 100 years from now, people have an understanding of what was originally recorded by an agency.

Then, also, any access or usage restrictions that apply to the source records must be captured and retained in the digital versions that are created.

Again, so the agencies and the National Archives can manage them appropriately moving forward.

Your equipment is going to generate technical metadata.  We have laid out some requirements that will help us preserve these records for as long as they are needed.

We have also included instructions as part of the records management for maintaining the digital records until you transfer them to NARA.  One of them is the generation of checksums so you can monitor any corruption that might occur through time.

There is the technical metadata describing the digitization process and the equipment that you have used.

Can we go to the next slide?

Validation.  This was introduced with our temporary regulation.  NARA is not involved in inspecting or improving your digitization projects.  Our oversight team may conduct an inspection.  This validation at end of the process is a critically important step.

We recommend that your agency meet with your general counsel and review, who is the appropriate person at your agency to conduct this validation?

It's a high-level process that's distinct from quality control or quality

management.  It is not a review of every image.  It is more of a high-level review

where you look at the documentation.  You look at your processes.  You make a

determination that you, as an agency, are satisfied you followed these regulations

and you feel what you have produced is of sufficient quality and completeness

and accuracy that the digital records can take the place of the source records.

Once you have done that, you have the authority to execute disposition on the

source records according to the records schedule or associated GRS.

Can we go to the next slide?

I believe I am turning this over to Lisa.

>> Thank you so much, Kevin and John.  Once you hit validation, you have come

to the end of what is in the regulations on how to digitize permanent records.

Before we get to questions, I said in the beginning, my goal was to hopefully

leave all attendees with an understanding and familiarity of all the parts of the

digitization regulations.

I also said we know that was the start of our work.  There is a lot more

information we need to provide you on how to implement these digitization

standards.  There has been a lot of questions we've given that were not

appropriate -- were not appropriately addressed in regulations but there might be some explanations coming.

What you are looking at right now is the link our colleague Andi Leo has been dropping it into the chat.  We have created a web page under our Important Topics.  This is the web page where as we develop future products or have answers, they are going to be on this web page.  For those of you on the phone, it is www.archives.gov/recordsheightenrichment/policyand/digitation.

We have a couple of boxes of information.  We plan to add more.  This is where you can find the link to the standards.  If you scroll down on your pages, there is the document.  They are forward slashes, forward slash, forward slash, forward slash.  You will be able to find information on communications.

More to come.  This is the place to find it.

In closing, I think there is one more slide.  I did want to say, how are you going to find these additional products?  I wanted to let you know what was coming.

We have been issuing a series.  We are working through it, a few more to come, on our Records Express blog.  That was sort of doing in writing what we did here today in our webinar.  Take each one of the sections, piece by piece, and talk about what's in them.

We will be issuing a GRS, 4.5 for digitizing records, believe that's one of the questions we had in chat already, is has transmittal 34 with that GRS gone out yet. The answer to that question is, no, it hasn't gone out yet. It is still going through the internal signature processes.

We expect GRS will be issued hopefully in the next few weeks. Those of you who know when NARA says soon, we know sometimes soon takes longer than any of us would appreciate. It should be out very soon, in a few more weeks.

That GRS is key, as John said, in order to implement the digitization regs give you the standard you have to validate to. The disposition authority comes from your records schedule, a general records schedule or an agency records schedule.

We will work to get the general records schedule out as soon as possible.

We know we have more digitization standards to issue. The next set of things we will be issuing will be the film records. We expect that will go much, much faster than the package we put out. We are going to be adding those standards to what already exists.

We don't need new documentation, new records management, new validation. That is all going to stay the same. We just need to get your technical standards for digitizing those types of materials.

I appreciate all the suggestions.  You haven't been able to see them.  I have been watching them come in through chat.  We are going to work on more guidance projects.  I appreciate the suggestions.  I'm sure we will talk about that soon.

I believe that takes us to the end of our formal presentation.