



ACHIEVING M-23-07 COMPLIANCE: YOU'VE GOT OPTIONS

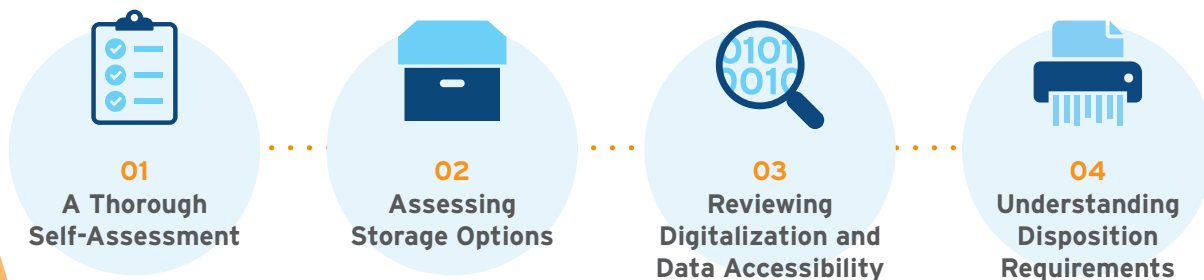
A JOURNEY TO DIGITALIZATION & DATA ACCESSIBILITY

Transitioning to a fully electronic government is the ultimate goal, but each agency will likely have to employ multiple strategies and specific timelines to achieve compliance by the National Archives and Records Administration (NARA) and the Office of Management and Budget's (OMB) deadline of June 30, 2024. With M-23-07 (an update to the previous M-19-21 memorandum) the goal is to modernize records and information management programs to enable agencies to refocus their staff on the mission, while improving efficiencies and saving costs.

According to the most recent Federal Agency Records Management Annual Report, "75% of agencies have policies and procedures that instruct staff on managing permanent records in all formats, with another 18% developing them. Less than one quarter (24%) of agencies said their permanent electronic records meet the transfer guidance, contain the appropriate metadata, have tested and/or successfully transferred these records to the National Archives."

To determine the optimal path towards compliance, agencies should think strategically, exploring partnerships that provide key benefits, such as support for self-assessment, strategic consultation, physical storage, destruction, and digitization. Determining a clear path to digitization helps agencies become more efficient, save money, and create a foundation for continuous digital transformation.

The journey for each agency involves understanding their own current environment and determining the appropriate options that fit their specific needs, budgets, and goals across the following four areas:





M-23-07 ASSESSMENT

Complying with M-23-07 is an investment. Approached strategically, the time and expense of attaining compliance will yield dividends in the form of future cost savings and more efficient operations in the long haul. Over the last 70 years, Iron Mountain has assisted more than 225,000 customers with their records management plans. Leveraging our experience and best practices, we know that assessing records collections early in the process positions an agency to establish a plan based on priorities and available budgets. A thorough review is an important step in ensuring the best use of funds. This assessment should include:



RETENTION REQUIREMENTS

Length of retention - whether 10, 20, or 100 years - is a key consideration for handling records in accordance with a rigorous cost-benefit analysis. If the retention period is unknown, agencies must identify those retention parameters in order to take proper action.



UNDERSTAND ACTIVITY LEVELS

As agencies start to identify the records they have, they must also determine how those records are being used. Knowing how often records are accessed - and in what ways - will inform the plan for securely storing those records and enabling efficient search and access.



DIGITIZATION STATUS

Agencies usually have a mix of physical records, digital records, and records that exist in some combination of the two. Understanding the purpose behind the mix of record types and an agency's digitization plans can determine the strategy for digital transformation. For example, if there is a regulatory requirement to keep physical copies of records that have been digitized, those physical copies can be stored almost anywhere.



GEOGRAPHIC LOCATION

Most agencies have records collections of various sizes located at sites across the country, usually because of mission-related or regulatory reasons. More often, records are stored where they are created. This is significant because rules and options for managing records sometimes vary by location. As such, agencies that have a better understanding of geographical requirements can navigate their digital journeys and make informed decisions about next steps.



ASSESSING STORAGE OPTIONS

Agencies can utilize NARA for records storage, but they are not limited to that option. It's important to remember that after the deadline, NARA will no longer accept physical records, and agencies will need to digitize their files prior to transfer. Agencies will also be required to close all agency-operated storage facilities. Thereafter, agencies must store their temporary records in commercial vendor storage facilities. Records can be stored based on type, circumstance, or location.

BY RECORD TYPE

LOW TO MODERATELY ACTIVE, TEMPORARY RECORDS

Agencies can take advantage of a commercial vendor's low storage rates and expansive NARA-compliant capacity for temporary records with all levels of service activity requirements. The cost savings is especially pronounced for temporary records with legally mandated retention periods and lower activity levels. When comparing pricing models, a commercial vendor's activity-based model would generate significant savings over NARA.

PERMANENT, LONG-TERM PRE-ACCESSIONED RECORDS

Many agencies have records designated as permanent that have long periods of time before they are accessioned. Consider working with a commercial vendor to store those records for the period up until accession - lowering costs and buying time to explore digitization options.

BY CIRCUMSTANCE

GEOGRAPHIC REQUIREMENTS

NARA has a limited number of locations - some are already full, while others are likely to close. If an agency needs to have records stored in a specific location, commercial vendors can offer a localized storage option. A partner with several facilities will not only support an agency's location needs, it will also offer savings on transportation and handling costs.





BY CIRCUMSTANCE

MULTIPLE DECENTRALIZED RECORDS HOLDINGS

If an agency has materials distributed and managed individually across multiple sites, such as several regional offices, transitioning to a consolidated program can be a challenging task. Commercial vendors that offer centralized systems - such as Iron Mountain's IMConnect™ - can help organize and manage all volume levels of records while enabling centralized oversight.

SERVICE LEVELS REQUIRED

Depending on the record and how often it is accessed, NARA's standard service levels may not always meet agency-specific needs. A commercial partner can provide varying service levels to ensure the most vital records will be accessible when needed.

SPECIALIZED NEEDS

M-19-21 includes mandates to close agency-operated records centers, but that does not necessarily mean agencies must cease all self-storing of their records. Based upon the Code of Federal Regulations (CFR) 36 Part 1234, agencies are allowed to maintain holding areas (including office space) containing less than 25,000 cubic feet of records (36 CFR § 1234.30), as long as they comply with facility standards. In certain circumstances it may provide an agency the most value by having records remain within the agency's own walls:

Control - Agency needs absolute, strict control over the use and access of certain records

Access Requirements - Agency uses records so frequently it makes most sense to maintain those records in-house

Specialty Collections - Agency has specific record types such as archival, historical, non-traditional, or special project-related records

Regulatory Requirements - Records are legally required to stay on agency grounds



REVIEWING DIGITALIZATION AND DATA ACCESSIBILITY NEEDS

The purpose of M-23-07 is to modernize government, but this transition is not always direct, transparent, or linear. As agencies move from physical documents to digital-born records, they need to establish an order for how and when they digitize older documents. Below are key reasons for the near-term digitization of records in a cost-effective manner:

> CITIZEN ACCESS

Records that are open to citizens or other agencies, such as benefits, health records, and employee files, need to be easily and quickly accessible. By digitizing these records, agencies can leverage some of the digital access platforms they are investing in now. This could ultimately save the cost and time of retrieving and servicing those records to and from records centers.

> RESEARCH APPLICATIONS

Records that have research applications such as FOIA and data analytics benefit from being digitized now so they can be leveraged electronically.

> HIGHLY ACTIVE WITH LONG RETENTION PERIODS

When records are highly active, the time and cost associated with working with the physical copies increases. If these records also have long retention periods, the cost will continue to increase over time. The sooner these can be digitized, the more money and time can be saved.

> WORKFLOW MOVING TO “BORN DIGITAL”

Some agencies are still in the process of changing their workflows to create new records digitally, while continuing to manage existing physical records that are part of their workflow. In these cases, agencies should immediately digitize any active physical records that are currently in a live workflow so that it can function entirely electronically.

If digitizing specific, strategic records has not already started, agencies need to begin now to meet the overarching goal of transitioning to a more digital government. Agencies can also leverage the General Services Administration (GSA) and NARA's partnership to procure comprehensive storage and digitization solutions. If records are digitized with proper metadata attached, agencies can start to extract additional value by leveraging artificial intelligence and machine learning capabilities. All these factors should be considered when weighing the significant costs of immediate digitization.



DISPOSITION OF RECORDS

Once an agency has performed a full records inventory, it will have a clear picture of what they have, what they will keep, and what is no longer needed. Agencies should use this as an opportunity to securely destroy records no longer needed in physical form.

➤ **Older Records**

Records that are past their retention dates and having no other identifiable use should be securely destroyed.

➤ **Unnecessary Records**

Not all records in a collection are needed, and not all have retention dates. Those records that are not required for an agency's mission should be disposed of.

➤ **Records with Quality Digital Copies**

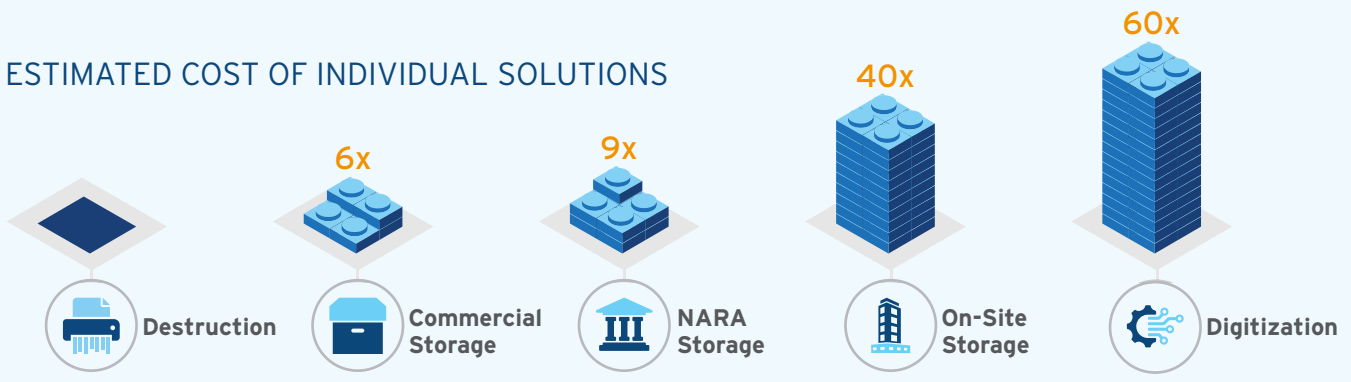
As agencies create digital records that serve their mission, they should destroy the physical records.

Once appropriate physical records are identified, agencies should plan to dispose of them using secure methods that meet federal regulations.



UNDERSTANDING THE FINANCIAL IMPACT

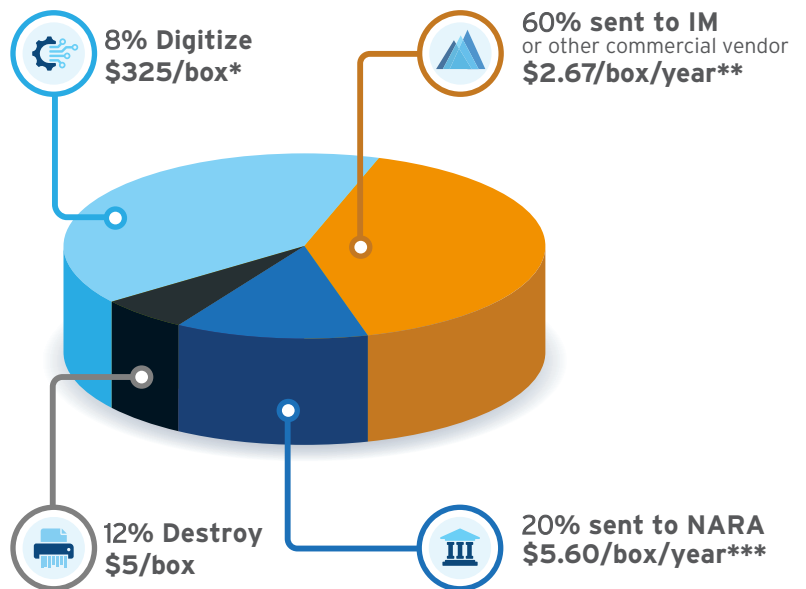
M-23-07 does not provide financial resources for meeting its mandates. Therefore, it is important to understand the financial ramifications of compliance. The cost for records to either be stored (for 10 years on average), destroyed, or digitized can result in significant costs.



REAL WORLD SCENARIO

Due to the unique situation of each agency, and the variety of costs involved, it is unlikely that an agency would choose a single solution for all of their information. As an alternative, the following scenario illustrates what a real-world combination of solutions would look like for 25,000 boxes of temporary government records. Once the agency has inventoried its boxes based on retention and service levels, the agency may determine that the following actions need to be taken.

- > **Digitize** - 2,000 boxes of highly active temporary records with 15+ years before retention date, to leverage new electronic workflows and eliminate frequent retrieval costs
- > **Iron Mountain** - 5,000 boxes of temporary records with 15+ years before retention date
- > **Iron Mountain** - 10,000 boxes of temporary records with 5 - 15 years before retention date and with low to medium activity.
- > **NARA Storage** - 5,000 boxes of temporary records with less than 5 years before retention date and high activity
- > **Destroy** - 3,000 boxes of temporary records that are past retention



NOTES:

* Assuming average box contains approximately 2,000 pages; pricing varies based on customer needs

** Commercial records stored for an average of 10 years

*** NARA records stored for an average of 5 years

All numbers are estimates for the scenario above. Actual changes may vary depending on client requirements

CONCLUSION

As the federal government continues to modernize, agencies are working towards a totally digital environment. NARA and OMB have helped with the initial steps by issuing M-23-07, but the journey will continue beyond 2024. Establishing a plan today is critical for all future project successes.

Iron Mountain Government Solutions is experienced in developing roadmaps for agencies to guide them on their digitalization and data accessibility journey. We've been doing this for over 70 years, and we know the nuances of compliance and governance. While your agency will take a unique path - shaped by where you are in the process, your needs regarding records, regulatory requirements, and budget constraints - now is the time to find the right solution. Let us help guide you down the right path. Contact us to get started at publicsector@ironmountain.com.



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Iron Mountain Government Solutions, a division of Iron Mountain Incorporated (NYSE: IRM), is a leader in innovative storage and information management services, storing and protecting billions of valued assets, including critical business information, highly sensitive data, and cultural and historical artifacts. We understand the complexities of bridging the gap between a hybrid physical and digital world, with data siloed across organizations. We help public sector agencies digitally transform, while implementing next-generation technologies that generate insights and unlock the value of your information. Our full suite of records and information management solutions improve asset management, reduce physical footprints, decrease costs, and streamline operations, while greatly enhancing citizen experience, and mitigating security and privacy risks. Visit www.ironmountain.com/publicsector to learn more, and follow us on LinkedIn.

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