Office of Information Affairs Notice

Date: August 14, 2026

To: Agency Records Officers

From: Alexis R. Graves

Subject: Guidance on Digitizing Temporary Records

United States Department of Agriculture (USDA) personnel[1] are authorized to digitize hard copy **temporary records** for the purpose of destroying them in accordance with 36 CFR 1236 Subpart D: Digitizing Temporary Federal Records and General Records Schedule (GRS) 4.5: Digitizing Records. Temporary records are records which have a National Archives and Records Administration (NARA) approved temporary records schedule.

USDA personnel may use government furnished multi-function printer/scanners to digitize temporary records. Some categories of records **cannot** be digitized for disposal using these devices. These include:

- Permanent records;
- Unscheduled records (those without a NARA approved retention schedule);
- Records with wet signatures which must be maintained by law;
- Records under litigation, audit, or preservation hold; and
- Records with intrinsic value in the original format that would be lost if the content were digitized.

Certain formats of records require additional technology which may not be readily available to personnel. The following formats **cannot** be digitized for disposal through this process without specialized equipment:

- Oversize records (larger than 11 x 17 inches); and
- Photographic negatives, transparencies, aerial film, roll film, micrographic and radiographic materials, motion picture film, and video and audio tapes.

These categories may be scanned for reference, convenience, or remote collaboration, but the hardcopies **cannot be approved for disposal** through this process. Personnel with questions about

[1] USDA personnel are defined as employees, contractors, students, volunteers, interns, fellows, and political appointees.

retaining permanent records, and records not suitable for digitization should contact their Agency Records Officer (ARO) for assistance.

The following guidance establishes requirements for digitizing temporary records with the goal of disposing the hard copy originals once all requirements have been met.

Disposal Requirements – Prior to Records Disposal

Before any hard copy records can be destroyed, the office must:

- Verify that a NARA-approved records schedule exists;
- Complete digitization of the records in accordance with this Notice;
- Validate the digitized records, ensuring all pages, parts, and information have been accurately and completely captured;
- Complete a Disposition Application;
- Submit the completed Disposition Application **and** a copy of the documented validation process to the ARO for review and approval; and
- Confirm no litigation, audit, or preservation holds apply.

Approval must be obtained from the ARO **before** destroying any hard copy records, in accordance with USDA policy.

Once approval is granted, hard copy materials must be destroyed. Sensitive records (those containing Personally Identifiable Information (PII) and Controlled Unclassified Information (CUI)) must be destroyed using a cross-cut shredder that produces particles that are 1 mm x 5 mm (0.04 in. x 0.2 in.) in size or smaller or pulverize/disintegrate paper materials using disintegrator devices equipped with a 2.4 mm (3/32 in.) security screen.

If a government-furnished shredder that meets these requirements is not available, offices may use existing secure shred contracts or establish new contracts.

Digitizing Requirements

To ensure continued business use, the digital records must fulfill the following:

- **Complete Capture:** All information in the hard copy records must be captured, including handwritten notes, color, graphics, highlighter, and light pencil marks;
- **All Pages Included**: All parts of the original record must be captured, including independent notes, sticky notes, photographs, and maps;
- **Functional Equivalence:** Digitized records must be capable of serving all purposes the hard copy records served, including the ability to legally attest to transactions and activities;
- **System Security:** Digitized records must be protected against unauthorized deletions, additions, or alterations; and
- **Lifespan Accessibility:** Digitized records must remain findable, retrievable, accessible, and usable for the records' entire retention period.

Preparing for Digitization

Before scanning records, USDA personnel must:

- **Establish Storage:** Determine where the digitized records will be stored.
    - Non-sensitive records may be stored in SharePoint, Shared Drives, or other accessible USDA environments.
        - Per USDA policy, OneDrive is not an appropriate storage location for scanned records due to current disposal procedures.
    - Sensitive records (containing PII and/or CUI) must be stored in secure, access-controlled folders or shared locations.
        - Per USDA policy, OneDrive is not an appropriate storage location for scanned records due to current disposal procedures.
- **Establish File Structure:** Establish a file organizational structure for the digitized records which mirrors the hard copy records.
- **Standardize Names:** Establish and apply a standard naming convention for folders, files, and documents, if necessary.
- **Prepare Documents:** Remove all fasteners, flatten pages, identify sticky notes, delicate, small format (under 8.5 x 11 inches) items, and items not authorized for destruction.
    - Delicate and small format items must be scanned on the flatbed portion of the scanner.
    - Sticky notes should not cover other information.
    - AROs must be contacted concerning any records identified that are not authorized for destruction under this Notice.

Scanner Settings

Settings may vary by device; the following are based on the available settings for the MPS 3 Xerox AltaLink C8155 multi-function printer/scanner:

- **Text Documents:** Scan textual documents to Portable Document Format (PDF) at 400 Pixels Per Inch (PPI), with Color Detect enabled.
- **Graphic Documents:** Scan images, graphs, maps to Tagged Image File Format (TIFF) at 400-600 PPI, the more detailed the original document, the higher the PPI. Grayscale should be selected for black/white graphics and color should be selected for graphics with color.
- **Output Rules:** Enable double-sided scanning and select the “Remove Blank Pages” setting.

If personnel do not have access to a printer/scanner capable of scanning to the same, or equivalent, specifications, contact the ARO for additional guidance.

Privacy Safeguards During Digitization

Personnel should take the following measures to safeguard PII throughout the scanning process:

- Scan records containing PII only in USDA-controlled workspaces using government-furnished multifunction printer/scanners that require PIV authentication.

- Be mindful of the physical location of the scanner and who may be able to view or access records containing PII while documents are being scanned.
- Ensure only personnel with an official need to know and a role in the digitization effort have physical access to records containing PII.
- Maintain control of records containing PII at all times and do not leave documents unattended on scanner trays, printer output trays, desks, or other shared workspaces.
- If you pause or step away from scanning, remove your PIV card and end your authenticated session before leaving the device unattended.
- If scanning activities are interrupted, immediately secure records containing PII in a locked cabinet, room, or other access-controlled location until scanning resumes.
- Remain aware of your surroundings throughout the scanning process to reduce the risk of unauthorized viewing or access to records containing PII by individuals without an official need to know.

Post Scanning Actions

To ensure the scanned records are usable, it is recommended personnel take the following additional actions:

- Apply Optical Character Recognition (OCR) to make text searchable;
- Update document properties (Title, Author, Subject, Keywords, and Language);
- Add tags and bookmarks, automatically or manually;
- Add alternative text descriptions for visual elements that convey information such as tables, figures, signatures, graphics, and photographs; and
- Save PDF documents in PDF/A to the designated storage location.

Validation

Digitized records must be validated against the hard copy originals to ensure all requirements have been met, and they can serve as the official recordkeeping copy. The validation process must be documented, and the documentation must be retained with the digitized records until disposition.

Validation must confirm:

- All pages and parts are present, legible, and usable.
- Pages are not folded, skewed, smeared, or improperly oriented.
- Information is not obscured by notes, scanner smears, or dark highlighting.
- Page counts match the hard copy source materials.
- Folder names, document titles, and document properties are accurate.
- File structure mirrors the original hard copy structure.

The ARO will complete a review of the validation process and digitized records prior to approving disposal of the hardcopy materials. Ensure to include a copy of the validation document and a link to the digitized file location(s) when submitting the Disposition Application to your ARO.

Contact Information

For any questions, contact:

- Departmental Records Officer (DRO) Beatriz Collazo, at Beatriz.Collazo@usda.gov;
- The Departmental Records Program at USDADepartmentalRecords@usda.gov;
- The Privacy Division at SM.OCIO.CIO.UsdaPrivacy@usda.gov; or
- The Controlled Unclassified Information at SM.IO.DC.CUI@usda.gov.