



Office of the Chief
Records Officer for the
U.S. Government

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June 20, 2023

Katelyn Foreman
Agency Records Officer
Department of the Treasury
Departmental Offices
1750 Pennsylvania Ave, NW
Washington. DC 20220

Dear Katelyn Foreman,

During our review of proposed agency records schedule, DAA-0056-2022-0010, it has come to our attention that the Office of the Special Inspector General for the Troubled Asset Relief program (SIGTARP) has been digitizing their permanent records and destroying the source records after digitization. The current SIGTARP records retention schedule, N1-056-10-001, includes disposition instructions that are written for paper records and at the time of scheduling SIGTARP was maintaining its records in paper format. SIGTARP did not submit a media neutral notification in accordance with NARA Bulletin 2010-04, which requires agencies to submit a notification form to NARA when converting previously scheduled permanent records to an electronic format. The notification form is used as a means of updating the records schedule.

We have additional concerns as to how these records are being digitized and how they are being stored and maintained, so that they can eventually be transferred to the custody of the National Archives at the end of their retention period.

In accordance with 36 CFR 1230.16, NARA is requesting that SIGTARP review this matter to determine whether the disposal of the source records constitutes an unauthorized disposition of records. Your report to NARA should document the impact on the permanent records covered by this schedule, including:

- A complete description of the records that have been digitized and are being digitized. Are the SIGTARP digitization efforts complete or is the work ongoing?

- For all the records being digitized, this information should include the disposition authority for the record, date spans, and a description of the records that were subject to SIGTARP's digitization procedures.
- A complete description that identifies whether the digitized records are complete, if there are any gaps in coverage or missing records, the presence of any mixed-media records, the disposition schedule under which the records fall, the date range when the records were created, and any access or use restrictions that apply to the records.
- A complete description of how the digitized records are stored, including the systems and locations.
- A complete description of SIGTARP's digitization process including their quality control and quality assurance processes. This should also include any policies or procedures SIGTARP uses to document their digitization process and what digitization standards SIGTARP applies during their process.
- A complete description of SIGTARP's plans to ensure that any future digitization meets the standards set forth in 36 CFR 1236, Subpart E. These plans must also include storage and maintenance strategies for these records, as set forth in 36 CFR 1236, Subparts B and C.

Additionally, until this matter is resolved, SIGTARP must cease destruction of source records after they have been digitized. Digitization and disposal of source records may continue only if SIGTARP is meeting all requirements for digitization as set forth in 36 CFR 1236, Subpart E, and if they have an approved disposition authority (either a GRS or a NARA-approved agency records schedule).

I appreciate your attention to this matter. If you have any questions or wish to discuss further, please contact me at laurence.brewer@nara.gov.

Sincerely,

A handwritten signature in blue ink that reads "Laurence R. Brewer".

LAURENCE BREWER
Chief Records Officer
for the U.S. Government

cc: Anna Canfield Roth, Acting Senior Agency Official for Records Management, Assistant Secretary for Management, Department of the Treasury