
Electronic Official Personnel Folder

eOPF-OG-007 dated 10-05-2023

Purpose

The purpose of this document is to describe the digitization validation and documentation required for all backfile and day-forward conversion scanning of analog/paper OPF into electronic format for use within the Office of Personnel Management (OPM) version of the electronic Official Personnel Folder (eOPF). This document also provides guidance regarding the disposition/disposal of source analog/paper OPF. This document assumes analog/paper OPF(s) have been digitized and quality control procedures have been applied as part of the digitization of analog/paper OPF. Agencies are advised that this Operational Guidance supersedes all previous versions of OG 007.

Validating digitization and disposition of source records

The standards in this document apply equally to digitization of source record analog/paper Official Personnel Folder (OPF) performed under contract managed by OPM, as well as scanning and transmission performed by federal agencies or third-party scanning services vender hired on behalf of federal agencies. The standards described in this document are based on the laws, regulations, directives, and guidance cited below:

- 44 USC Chapter 33
- 36 CFR 1220, 1222, 1224, 1230 and 1236 Subpart D
- 5 CFR 293
- OMB/NARA M-23-07 Memo, from Office of Management and Budget and National Archives and Records Administration, Update to Transition to Electronic Records, extending the M-19-21 deadlines to June 30, 2024 for Heads of Executive Departments and Agencies dtd December 23, 2022
- NARA Bulletin 2020-01 dtd September 30, 2020 Clarify OMB-NARA memo M-19-21
- General Record Schedule (GRS) 4.5: Digitizing Records dated 06/2022
- Agencies with questions regarding the standards described in this document should refer their questions and/or concerns to their agency General Counsel, Records Officer, and/or Human Resources policy office. Agencies requests for further information should be sent to rmstandards@nara.gov with any questions on records management and digitization.

Validation of Digitization

Agencies shall establish processes to validate the digitization of source analog/paper OPF(s) and maintain required documentation of validation process leading to the disposal of the original source analog/paper OPF(s). Ref 36 CFR 1236.34.

Agencies should confer with their agency Records Manager/Officer, Office of General Counsel, and Human Resources policy office(s) to craft their own eOPF validation process. Agencies must develop and retain documentation for supporting the agency's basis to validate the eOPF digital records as the official personnel records leading to the disposal of the original source analog/paper documents. Ref 36 CFR 1236.34, 1236.36, and GRS 4.5

Agency crafted validation process should be designed to ensure digitized versions are of suitable quality to replace the original source records which leads to the disposal of the paper OPF. Ref 36 CFR 1236.34 and GRS 4.5.

The validation process should include checks of image quality to ensure:

- **Overall image quality** – The scanned image must be accurate, complete (no faded areas), aligned and exactly matching the source document.
- **Legibility** – The scanned image must mirror the legibility of the source document. The scanned image must be as legible, if not more legible, than the source document.
- **Completeness** – The scanned image must be whole and not a portion of the source document. Two-sided and multi-page documents must comply with federal guidance. Tears and folding on the source document must be corrected, to the extent possible, to ensure a complete document image.
- **Alignment** – The scanned image orientation must mirror that of the source document scanned. The agency must ensure that scanned images display in the correct orientation in eOPF.
- **Unitization** – Ensure the front and back of a two-sided document are sorted as one document. Multiple pages of a single form must be in eOPF as a single document. The first page must be the form that indicates the document type when there are multiple pages of a form. For example, position description cover sheet should be the first page of a position description.

The validation process should include checks to ensure all fields are indexed according to the Master Forms List (MFL):

- **Social Security Number (SSN)** – The SSN of the employee to whom the OPF belongs. Verify the SSN, Name, and Date of Birth (DOB) on both the scanned and source documents are the same to ensure the document is for the correct employee. NOTE: Not all documents required for digitization and upload to the eOPF for the subject employee display SSN and/or DOB such as Resumes and Academic Transcripts.
- **Form Number** – The Document index matches source document form number or associated DG form number/equivalent.

- **Form Description** – The Document index matches source document form description or equivalent.
- **Form Type** – The form type matches form Type as identified on the MFL.
- **NOA Code 1** – If applicable, ensure Nature of Action Code in eOPF index matches source document.
- **NOA Code 2** – If applicable, ensure Nature of Action Code in eOPF index matches source document.
- **Effective Date** – The effective date is the date the form or action on the form becomes official. The criteria for determining the effective date when it does not appear on the document are in the Conversion Business Rules.
- **Delivered Side** – Delivered Side is the folder side in which the form will reside. Folder sides are Permanent, Temporary or Performance unless the agency records manager agreed to additional folders.
- **Merge Folder Flag (Y/N)** – The Merge Folder Flag is used when employment records created under OPM’s general recordkeeping authority are mixed in the same file with employment records created outside OPM. Reference Guide to Personnel Recordkeeping regarding records for personnel systems not under OPM’s recordkeeping authority.
- **Duplex Document Flag** - When PDFs are transmitted to eOPF via the IDF, Duplex refers to a paper form with information on both sides when printed.
- **Retention Date** – The date after which the document is no longer a valid document.

Any Errors with Image Quality, Indexing, and/or Missed Record(s) Must be Corrected as Part of the Validation Process.

Validation documentation – Agency must document the validation process of digitized analog OPFs and retain that documentation IAW 36 CFR 1236.34(c). This document should explain the agency methods of validation procedures (via 100% of folders validated, sampling of folders digitized, or statistical modeling) and what is involved as part of validation process. Validation process ends when the agency uploads a copy of the validation process to the eOPF folder for subject employee in the eOPF system. Ref DG 88 eOPF Certification of Record as a suggested format/sample for document describing agency validation process to be added to subject employee eOPF.

- At minimum, the validation documentation must contain:
- Full Agency/Subagency/Bureau name that digitized an analog/paper OPF.
- Date the validation was completed.
- Details describing the validation process.

Recommended additional information data points:

- Identity of previous employing agency and date range of previous period of employment digitized to electronic format.
- Annotate that the subject employee was notified of digitization of analog/paper OPF if agency has elected to notify employees.

- Annotate that subject employee was advised of procedures to report errors or missing records prior to disposal of original source records if agency has elected to establish such.

Agencies should review their validation processes periodically to ensure continued compliance with law, regulation, directive, and guidance.

Regarding the digitization of analog source records created as part of routine Human Resources related processes (i.e., recruitment, placement, benefits, beneficiary forms, performance, etc.), the agency is not required to add a document describing the digitization validation process for these individual (ones and twos) source records to the eOPF. The agency will retain a copy of the digitization validation process covering analog source records, created as part of routine Human Resources related processes, that are authorized for inclusion to the eOPF temporary, performance, or permanent folder. The agency will keep this document available for review upon request by National Archives and Records Administration (NARA) or appropriate office(s).

Disposition of Original Source Records Under OPM Recordkeeping Authority

After completing validation procedures that makes the digitized version “the” official personnel record the agency may dispose of the original source records that are under OPM recordkeeping authority pursuant to GRS 4.5, subject to any pending legal constraint on the agency such as a current litigation case. The agency is responsible for disposition of source analog OPF(s) that meet security requirements related to Personally Identifiable Information (PII). Agencies should consult with their records officer, General Counsel, and agency Human Resources policy office regarding the retention and disposal of original source record OPF(s) that have been digitized.

Agencies are strongly encouraged to 1) establish a process of notifying subject employee that his/her paper OPF has been digitized to the eOPF system, and 2) establish a process in which subject employee may report errors or missing record(s) prior to the disposal of original source record(s).

Agencies are advised that 5 CFR 293.309 Reconstruction of lost OPFs still applies to records that may have been validated and destroyed as part of digitization processes/procedures. Reads: Agencies will take necessary precautions to safeguard all OPFs. In the event of a lost or destroyed OPF, the current (or last, in the case of a former Federal employee) employing agency shall take the necessary action to reconstruct the essential portions of the OPF as specified in the Guide to Personnel Recordkeeping or other office instructions.

Advisory: National Personnel Records Center (NPRC) will not accept original source OPF that have been digitized as of 12/31/2022. Ref M-19-21

Disposition of Original Source Records not Under OPM Recordkeeping Authority

Upon completing validation of digitization, the agency shall return source records that are not under OPM recordkeeping authority to the record owner. Agencies should reference

Guide to Personnel Recordkeeping for employment systems outside the Office of Personnel Management's recordkeeping authority in determining the source record(s) that should be returned to the record(s) owner. Ref Ch 5 OPM Guide to Personnel Recordkeeping and Question 7 of NARA FAQs for GRS 2.2, Employee Management Records.

When sending source records that are not under OPM Recordkeeping authority to original owner, OPM recommends the agency include a memo as coversheet stating that the records have been digitized and uploaded to the OPM eOPF system. The coversheet should also include 1) POC information for agency conducting validation of digitization, 2) dates digitization was validated, and 3) statement that the source record(s) not under OPM Recordkeeping authority are being sent to original owner for disposition or retention.

Generic template – eOPF Certification of Record DG-88

Memorandum for Record, validation of digitization of analog Official Personnel Folder (OPF)

1. The purpose of this memorandum is to document the digitization validation process for subject employee analog OPF(s) IAW 36 CFR 1236 Subpart D. This memorandum will be added to the subject employee electronic OPF.
2. Subject of OPF:
3. (Full Name and Full SSN at the time an analog OPF has been digitized)
4. Agency that performed digitization validation: (Full Agency/Bureau/Department Name)
5. Date digitization validation completed: (Date validation completed)
6. Agency validation process:

(Insert details describing agency validation process here. Details of the validation process must be sufficient to describe the agency's basis to validate the eOPF digital records as the official personnel records leading to the disposal of the original source documents. If agency validation process requires multiple pages the agency may annotate that a copy of the validation plan has been attached to this memorandum here and combine this memo with the validation procedures. This memorandum must be the first page(s) of a documentation of validation process PDF.)

7. Disposition of records not under Office of Personnel Management (OPM) recordkeeping authority
 - a. Did the analog OPF contain records that are not under Office of Personnel Management (OPM) recordkeeping authority? (YES or NO)
 - b. If answer was "Yes", provide address(s) the records not under OPM recordkeeping authority were sent to. Mark as not applicable if answer was "No".
8. 5 CFR 293.309 Reconstruction of lost OPFs still applies in all cases of incomplete or missing employment records. In the event of a lost or destroyed OPF, the current (or last, in the case of a former Federal employee) employing agency shall take the necessary action to reconstruct the essential portions of the OPF as specified in the Guide to Personnel Recordkeeping or other Office instructions.
9. Optional additional information provided at agency discretion. ((Delete from finalized memo if/when not used))

- a. Identity of previous employing agency and dates of previous period of employment digitized to electronic format.
 - b. Annotate that subject employee was notified of digitization of analog OPF if agency has elected to notify employees of such.
 - c. Annotate that subject employee was advised of procedures to report errors or missing records prior to disposal of original source records.
10. Questions or concerns regarding this memorandum should be referred to (insert agency designated POC here).

Signature block here

Instructions

The memorandum should be on the Agency's letterhead. OPF Digitization Validation Record is only required to document the validation process of analog/paper OPFs (with complete employment history or as separate periods of employment in the event previous periods of employment have not been consolidated to a single folder). Agencies will keep a copy of their digitization validation procedures for independent analog/paper records created as part of routine Human Resources line of business actions and activities. Agencies must maintain the copy of digitization validation of independent analog/paper records and be prepared to provide that document upon request from National Archives and Records Administration (NARA), Office of Personnel Management (OPM), or appropriate agency office/authority.

Agency may use the Generic Template – OPF Digitization Validation Record for the purposes of 36 CFR 1236.34(c) or establish their own version. However, if agency elects to create and use their own version of record for validating digitization, the agency version must have the following data points/information as a minimum:

1. Full name and Full SSN of subject of analog/paper OPF at the time an analog OPF has been digitized,
2. Name of agency/bureau/department that performed the digitization validation,
3. date of digitization validation was completed, and
4. description of digitization process.

Description of the validation process must be sufficient to describe the agency's basis to validate the eOPF digital records as the official personnel records leading to the disposal of the original source documents. If agency validation process requires multiple pages, the agency may annotate that a copy of the validation plan has been attached to the memorandum/digitization validation record cover page and combine the validation procedures as one PDF. The memorandum/digitization validation record cover page must be the first page(s) of a documentation of validation process PDF.

Agencies will add a copy of the digitization validation record to subject employee eOPF as a PDF using form number "DG-88" Form description "eOPF Certification of Record" with the effective date of the record the same as the date digitization validation was completed.

Agencies are encouraged keep a copy of the agency overall digitization procedures as a separate document with the agency office(s) deemed most suitable for such records. Agencies are also encouraged to maintain copies of past digitization validation procedures if the validation procedures change over time.