



**STRATEGIC PLAN**

**FOR**

**PERSONNEL ACTION DOCUMENTATION**

**AND**

**RECORDKEEPING**

**Prepared by the U.S. Office of Personnel Management  
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## **PART I — INTRODUCTION**

In response to National Performance Review (NPR) recommendations and other guidance, the U. S. Office of Personnel Management (OPM) has delegated to agencies a large measure of flexibility in the management of the Federal government's human resources. Concurrently, advances in automation technologies are providing new opportunities to improve human resources management. Pushed by these changes and consistent with the spirit of the NPR to identify essential functions and then use technology to perform them more efficiently, we reassessed our personnel documentation and recordkeeping requirements.

Personnel documentation and recordkeeping requirements serve a number of functions, but the prime function is to provide an employment history that can be used to make personnel management determinations about employees throughout their Federal careers. The technologies used to perform this function may change, but the basic function will not.

Current documentation and recordkeeping requirements were designed for a paper-based system supporting a highly centralized human resources management system. With the improved efficiency and lowered costs of modern technologies, we believe that we should be moving toward fully automated systems and paperless personnel processing. Consistent with OPM's delegations of human resources management flexibilities to agencies, we believe we may effectively delegate documentation, recordkeeping and automation flexibilities to reduce central recordkeeping requirements.

This goal is long-term. There are a number of steps that must be taken to meet this goal while continuing to fulfill the basic function of personnel documentation. This paper describes the steps - projects that we propose to undertake with participation from other interested parties. Each project will itself change some aspect of personnel documentation and recordkeeping as well as bring us closer to the goal of total automation.

## Office of Personnel Management's (OPM) Governmentwide Documentation Authority

Title 5 [U.S.C.](#) 2951, Title 5 [U.S.C.](#) 7201(e) and Civil Service Rule 7.2 define OPM's authority to prescribe agency documentation, recordkeeping, and reporting procedures. Executive Order 12107 designates OPM as the owner of the Official Personnel Folder (OPF) with authority to prescribe regulations relating to agency OPF establishment and maintenance. Under these authorities, the Office of Workforce Information (OWI) promulgates Governmentwide personnel action processing and recordkeeping regulations and guidance.

Personnel action processing refers to the documentation of an individual's appointment to Federal employment, selected changes in employment status or employee benefits, and separation from Federal employment.

Recordkeeping refers to the requirement for filing and retention of personnel action processing and related documents.

OPM's personnel recordkeeping regulations are found at 5 [CFR](#) 293; procedural instructions are found in two OPM Operating Manuals, THE GUIDE TO PROCESSING PERSONNEL ACTIONS and THE GUIDE TO PERSONNEL RECORDKEEPING.

## History

Since the inception of the Federal bureaucracy, agencies have maintained personnel files. The SF 50, Notification of Personnel Action was established in 1940 to provide a **standard** for agencies to document appointments to, changes in, and separation from Federal employment. The Official Personnel Folder (OPF) was established in 1947 to provide a Governmentwide **standard** for filing and retaining the SF 50 and dozens of other related standard forms. Among the related forms was the SF 52, Request for Personnel Action which effected **standard** procedures for the agency to initiate and record approvals of personnel actions.

Since 1947 the Official Personnel Folder (OPF) has evolved into a central depository for variety of records that Office of Personnel Management (OPM) believes an agency needs to conduct its personnel activities. These records may be categorized as:

- (1) records of personnel actions that comprise an employee's employment history;
- (2) records that support the validity of an agency's personnel actions;
- (3) records of benefits coverage and rights;
- (4) records to support an agency's internal statistical information needs and OPM statistical reporting requirements;
- (5) records to provide a new employing agency with selected data on an employee's prior Federal employment.

### **Size**

An Official Personnel Folder may contain one or more of about 150 types of documents. Documents may be single or multiple page, and may be on file in the OPF just once for a unique event or multiple times for recurring events such as training. Additionally, one document, the SF 50, Notification of Personnel Action is filed in the OPF to record any of about 125 events that may occur during an employee's career. A "typical" OPF may contain 200 or more pages of documents.

### **Documentation and Recordkeeping Resources**

Agencies annually process about 14 million personnel action and related documents that they retain in about 2.1 million active Official Personnel Folders (OPF). Another approximately 80 million OPFs of former Federal employees are stored at the [National Personnel Records Center \(NPRC\)](#), National Archives and Records Administration. Each year NPRC responds to 250 to 500 thousand requests for information from the OPFs in their custody.

The Office of Personnel Management (OPM) has about 750 pages of instructions on documenting personnel actions and about 100 pages of instructions on filing personnel documents in the OPF. Governmentwide, an estimated 13,000 personnel clerks and assistants and about 2,000 personnel staffing specialists refer to OPM's personnel action processing and recordkeeping instructions in the conduct of their work.

### **Documentation and Recordkeeping Stakeholders**

In determining whether to establish, rescind, or revise personnel recordkeeping regulations and documentation procedures, the Office of Personnel Management (OPM) carefully considers the expressed information needs, policies, regulations, guidance, and desires of users of the recordkeeping and documentation process. These include agencies that carry out recordkeeping and documentation requirements, as well as employees and their representatives. OPM also pays heed to other institutions such as the [National Partnership Council](#) and the [National Archives and Records Administration](#). OPM will coordinate all proposed changes as appropriate with these stakeholders.

## PART II — THE PROPOSAL

Our goal is to facilitate the application of modern automated technologies to personnel documentation and recordkeeping. This Strategic Plan represents a structured approach toward that goal. Its focus is on Office of Personnel Management's (OPM's) role in setting Governmentwide requirements and policies. These policies should encourage appropriate use of automated technologies while assuring that all legal documentation requirements are met; the Government's management information needs are fulfilled; and the security and privacy of employees' records are maintained. The specific steps toward the goal are defined in the Plan as a series of projects. The projects are designed to allow relatively short-term accomplishment of particular outcomes that move toward the long-term goal. The intended results of each project and the Plan are to ensure maximum efficiency in personnel documentation and recordkeeping. Efficiency is measured not just in terms of reduced overall cost but also in qualitatively improved service to the Federal community.

Agencies differ in their missions, organizational structures, resources, and management styles; consequently, their pace of implementing personnel processing modernization will differ. Full exploitation of automated documentation and recordkeeping technology requires significant investment in equipment, software, staff, retraining, and time. This Plan is designed to create a policy framework for agencies as they make the required investment.

The goal is a long-term goal, to be achieved over a period of years, not months. There are difficult technical and management issues to be resolved. Human resource management programs will continue to change and personnel documentation and recordkeeping requirements must change with them. This Plan must be an action document. It will be revised over time to reflect the impacts of technological advances, human resource management policy changes, and the outcomes of the Plan's completed projects.

Projects in this Plan are presented in numeric order for convenience. Projects that must be completed before others may begin are presented in that order and their interconnected nature is identified in the discussion of the project. The presentation order is not strictly chronological since some projects may be undertaken concurrently. Specific beginnings and endings for the projects will be determined after further development and consultation with stakeholders.

## **PART III — PROJECTS**

### **1. *Unnecessary Official Personnel Folder (OPF) Filing Requirements***

#### **Current Situation**

The GUIDE TO PERSONNEL RECORDKEEPING requires that about 150 types of documents be filed in the Official Personnel Folder. Many of these requirements had not been reviewed for a number of years despite changes in personnel laws, regulations, and the personnel office operating environment.

#### **Discussion**

In the summer and fall of 1995, an Office of Personnel Management (OPM) work group reviewed all of the Official Personnel Folder (OPF) filing requirements. Each requirement was reviewed to determine if its inclusion in the OPF was still necessary, i.e., that it still served to document an employee's work history with information that would be relevant throughout that employee's Federal career. The work group identified 29 documents or types of records which did not meet the criteria for continued retention in the OPF. The work group's recommendations were approved by all of OPM's Associate Directors.

#### **Expected Outcome**

In March 1996 the Office of Personnel Management (OPM) revised THE GUIDE TO PERSONNEL RECORDKEEPING to delete requirements for filing in the Official Personnel Folder (OPF) the documents the work group identified as no longer necessary. Full implementation of the changes was required by December 31, 1996. The revisions should reduce the number of documents filed by agency personnel clerks by about 35 percent. Smaller-scale reviews of OPF filing requirements will be an ongoing process.

## **2. *Flexibility in Processing Requests for Personnel Actions***

### **Current Situation**

We presently require that agencies initiate most of their personnel actions on [Standard Form \(SF\) 52, Request for Personnel Action](#). The SF 52 standardizes the format, data element content, and medium for recording authorizations of personnel actions. The processing requirements are designed for a manual processing environment and are based on an assumption the Government benefits from maintenance of a standardized processing system.

### **Discussion**

For many and perhaps all agencies, the manual personnel action processing environment no longer exists. Additionally, the Office of Personnel Management (OPM) has given agencies more flexibility in exercising personnel authority. This direction calls into question the assumption that there is an inherent benefit in requiring a standardized processing system. Any standardization must demonstrate "added value." This project will review the need for a standardized personnel action request process.

### **Expected Outcome**

We expect to revise the Governmentwide requirements for the personnel action request process to focus on the basic requirements of such a system but leave to agency discretion the specific forms used to initiate personnel actions. We will, of course, continue to require that agencies comply with personnel action authorization requirements in Office of Personnel Management's (OPM's) regulations (e.g. 5 [CFR](#) 575.302 which requires that an agency head approve retention allowances). The focus will be on what must be done, not on how it must be done. Such matters will be left to the discretion of the agencies subject to any Governmentwide processing or format standards that might be developed in coordination with stakeholders.

### **3. *Redefinition of Official Personnel Actions***

#### **Current Situation**

The Office of Personnel Management (OPM) defines official personnel actions in THE GUIDE TO PROCESSING PERSONNEL ACTIONS. We currently identify about 125 different employment events as official personnel actions and require that agencies prepare an Standard Form (SF) 50 or equivalent documentation whenever each event occurs. Each of these employment events must be documented as a permanent part of the employee's Official Personnel Folder.

#### **Discussion**

We think that our current definition of employment events as official personnel actions may be too broad. Some of the events do not appear to be part of the employee's history that have long-term consequences for his/her employment but rather are serving internal reporting systems needs. These include providing a method to collect data for agency internal use or for reporting to Office of Personnel Management's (OPM's) Central Personnel Data File. While the need for the data may continue, the use of the official personnel action as the means for collecting these data may not. This project will review the definition of events that are official personnel actions. The focus will be on documenting only events that have a long-term impact on the employment history and that are not documented on other forms.

#### **Expected Outcome**

We will reconfirm the events that are defined as official personnel actions.

#### **4. *Approval of Agency Conversion of Official Personnel Folder (OPF) Content to non-Paper Mediums for Internal Use***

##### **Current Situation**

We require that agencies obtain prior Office of Personnel Management (OPM) approval before converting any Official Personnel Folder (OPF) records from paper to digitized, microform or imaged formats. Upon approval and with some exceptions, agencies may discontinue storage of paper forms in their internal systems. The exceptions pertain to selected documents such as life insurance beneficiary forms that contain original signatures. These documents must be retained on paper. They may be converted to an electronic medium for agency use, but the agency must continue to produce and store the paper forms.

##### **Discussion**

The [National Archives and Records Administration \(NARA\)](#), the [National Institute of Standards and Technology \(NIST\)](#) and other Federal Government agencies promulgate standards for the storage of records and data on digitized, imaged, microform, and paper mediums. This project would reevaluate the need for the Office of Personnel Management's (OPM's) prior approval of agency internal data storage and retrieval systems. We will evaluate the effectiveness of the prior approval requirement in meeting our concern that the information be available to make employee rights and benefits determinations based on a Federal career that may span employment in more than one agency.

##### **Expected Outcome**

We would issue a policy statement that defines the requirements agencies must meet to store Official Personnel Folders (OPFs) in an alternative storage medium **for internal use**. Until other steps are taken to assure interagency transferability of OPF data in alternative mediums, we expect we would continue to require that agencies produce paper records from the alternative medium when an employee separates and also upon demand. We would expect also that agencies comply with the [National Archives and Records Administration](#), [National Institute of Standards and Technology](#) and other applicable Government records storage standards and would continue to retain on paper those documents the Office of Personnel Management (OPM) specifies for such retention.

**5. Standard Form (SF) 50, Notification of Personnel Action**

Three proposed projects would deal with the uses of, remarks recorded on, and substitutes for Standard Forms (SFs) 50.

**a. Alternatives to the Standard Form 50 for Informing Employees of Personnel Actions****Current Situation**

We require that agencies use the Standard Form 50, Notification of Personnel Action to notify employees of personnel actions. We allow other forms of employee notice (list forms, earnings statements) in limited situations.

**Discussion**

Some agencies contend that the cost of printing and distributing employee copies of Standard Form 50 is prohibitive; that the distribution system causes the forms to reach employees too late to be informative for certain actions; or that individualized letters would be more meaningful than a form. They wish to notify employees of selected personnel actions such as pay increases, step increases, and promotions on documents such as earnings statements that are distributed routinely each pay period. Other agencies suggest using routine notices such as earning statements to alert the employees of changes and letting employees view their records by accessing automated personnel data files.

**Expected Outcome**

We will redefine our policy on **mandatory** use of the Standard Form 50 as the sole method of notifying employees of personnel actions. We may delegate to agencies more flexibility to determine how they notify employees of selected personnel actions. We expect the delegations would include minimum requirements on the content of the notifications, continued production of documentation for the Official Personnel Folder (OPF), and reminders of the role of employee organizations in selecting appropriate notification procedures.

## **5. *Standard Form (SF) 50, Notification of Personnel Action***

### **b. *Reducing the Number of Standard Form 50 Remarks***

#### **Current Situation**

We now prescribe about 500 remarks from which an agency must select one or more, as applicable, for entry on a given personnel action. In some situations, a single personnel action may require several remarks occupying many lines of text. Some remarks are informational; others contain data that must be preserved as part of the employment history.

#### **Discussion**

Some agencies wish to substitute a summary record for the individual Standard Forms (SF) 50 filed in Official Personnel Folders (OPFs). Because of the volume of remarks text, the efficiency of such a summary statement may be defeated (i.e., a summary might occupy as much space as the several SFs 50 it replaces). This project would identify remarks that are transitory or informational and those that contain permanent information. As agencies test the use of summary records in lieu of individual SFs 50 for OPF documentation, the tests may be designed to include the permanent remark information only.

#### **Expected Outcome**

We will identify remarks that are no longer necessary, those with information of permanent value that must be stored in the Official Personnel Folder (OPF) and those that must be included in employee notices but may not be required in OPF documentation.

**5. Standard Form (SF) 50, Notification of Personnel Action****c. Personnel Action History Transcripts in Lieu of Standard Forms 50****Current Situation**

We require that agencies use individual Standard Forms (SF) 50 to document each personnel action. Each SF 50 must be filed in the employee's Official Personnel Folder (OPF).

**Discussion**

Agencies are concerned about the cost of printing and filing a separate Standard Form (SF) 50 for each personnel action. The practice seems particularly costly when only one or a few items on the SF 50 are changed. Some question whether a summary statement, which we refer to as a "personnel action transcript of service," will meet the information need at a reduced cost.

**Expected Outcome**

We will review our policy of requiring individual Standard Forms 50 as Official Personnel Folder documentation of each personnel action. If we determine that a personnel action transcript of service is an acceptable substitute for specific personnel actions, we will allow optional use of a transcript. We will prescribe the format (content, coding, structure) and require that agencies be able to provide the transcript on paper.

## **6. *Electronic Transfer of Preliminary Employment Information***

### **Current Situation**

When an office is hiring someone from another Federal agency or office and does not have the applicant's Official Personnel Folder (OPF), they may gather basic information to process the appointment from the losing office. Personnel offices use the Standard Form (SF) 75, Preliminary Employment Data to verify key information and obtain data required to process the appointment in their internal personnel processing systems. Personnel offices can request information by phone or by mail; the information may be taken from the OPF or from other agency files such as security, adverse action, and payroll files.

### **Discussion**

Some agencies have expressed an interest in receiving preliminary employment information in an electronic format to save rekeying data into their personnel processing systems. Use of electronic transfers would be an additional option for those offices able to create and accept such information. This project would define a process for electronic transfer of preliminary employment information among personnel offices. The process may specify the content and format of electronic transfers or may decide to allow the content to be negotiated between offices on an ad-hoc basis. The process must set Governmentwide security requirements for electronic transfers.

### **Expected Outcome**

We will publish standards for electronic transfer of preliminary employment information. Lessons learned from experience with these smaller scale transfers will form a basis for potential electronic transfer of more complete personnel information, i.e. an electronic Official Personnel Folder (OPF).

## ***7. Documents With Original Written Signatures***

### **Current Situation**

We require that a number of documents such as life insurance beneficiary forms be retained in a paper medium because they have written original signatures. Agencies that convert the content of such documents to a non-paper medium such as microfiche must continue to maintain concurrently the original paper.

### **Discussion**

The requirements for written signatures on original documents are required by law or by the Office of Personnel Management's (OPM's) interpretation and implementation of such law. OPM program offices and interagency groups have been working on processes that will reduce the number of such documents (e.g., electronic processing of health benefits changes). Technical, legal, and administrative issues relating to the use of digital signatures are being explored by groups in the public and private sector. Decisions on the acceptability of electronic in lieu of paper records will impact on Official Personnel Folder recordkeeping requirements.

### **Expected Outcome**

Incorporate program decisions to accept in an electronic medium the records now requiring an original written signature. This outcome would expand on the use of alternative mediums for storing Official Personnel Folders.

## **8. *Filing of Benefit Documents***

### **Current Situation**

"Benefit" documents show that an employee is eligible for, elected or declined such benefits as health or life insurance coverage. Benefit documents are a large percentage of the types of documents filed in an employee's Official Personnel Folder (OPF).

### **Discussion**

The Office of Personnel Management (OPM) is presently working toward modernization of its retirement systems, both Civil Service Retirement System (CSRS) and Federal Employee Retirement System (FERS). The modular components of this modernization effort will provide the data necessary to process retirement claims. Other automated systems allow electronic processing of benefits, such as health benefits elections. As the retirement systems modernization effort moves forward, OPM will work with agencies to find the most appropriate methods of collecting and conveying benefit documents. Inclusion of such documents in a paper Official Personnel Folder will be one but not the only option considered.

### **Expected Outcome**

Requirements for filing benefits documents in the Official Personnel Folder (OPF) will be reviewed and revised as the Office of Personnel Management (OPM) proceeds with the retirement systems modernization effort and approves other electronic means of creating and storing benefits information.

## **9. *Official Personnel Folder (OPF) Personnel Data Element Standardization***

### **Current Situation**

We require many documents, in addition to the Standard Forms (SFs) 50, be filed in an Official Personnel Folder (OPF). These documents record employment history and employee rights and benefits.

### **Discussion**

Agencies wish to digitize data on forms and documents other than Standard Forms (SFs) 50 and to store the data independently of the format. They believe "digitization" will improve the efficiency of their personnel operations. Efforts to digitize personnel information could also be part of earlier projects like creation of the personnel action history transcript and use of automated systems for employee benefits.

Data may be represented as agencies wish as long as the data is used internally. If Official Personnel Folder (OPF) information is to be transferred among agencies, there must be standard data element definitions (name, size, code meanings). Current interagency personnel data standards are defined in the Office of Personnel Management's (OPM's) Operating Manual, THE GUIDE TO PERSONNEL DATA STANDARDS. Expansion of data transfer will require data standardization for information that does not appear in the GUIDE but is part of the OPF. This project would define such standards.

### **Expected Outcome**

We will prescribe data element standards for interagency transfer of the data agencies must include in the Official Personnel Folder (OPF).

## **10. *Official Personnel Folder (OPF) Transcript of Service***

### **Current Situation**

The Personnel Action History Transcripts in Lieu of Standard Forms (SFs) 50 describes a proposal to allow agencies the option to substitute a summary statement in lieu of individual SFs 50 for personnel actions. The Official Personnel Folder (OPF) Personnel Data Element Standardization describes a proposal to define standard data elements for information in individual OPF documents.

### **Discussion**

Taken together the project outcome products listed above comprise the complete Official Personnel Folder (OPF) content. A standard format for these OPF data should provide a reliable substitute for most, if not all, of the individual documents in the OPF itself. This project would bring all of those items together as a redefined OPF. In this project, we would define the format for a complete service history, including items from Standard Forms (SFs) 50 and other forms in a single "transcript."

### **Expected Outcome**

We expect the redefined Official Personnel Folder (OPF) will focus on storing information rather than forms. The information will be transferred in an easily understood format, using Governmentwide standards and procedures. The redefined OPF will be equivalent to "an OPF transcript of service" that is a summary of relevant employment history. The "OPF transcript of service" would subsume the "personnel action transcript of service."

## 11. *Merged Records Personnel Folder (MRPF)*

### **Current Situation**

Merged Records Personnel Folders (MRPFs) are folders that contain records established and maintained both outside and within the Office of Personnel Management's (OPM's) recordkeeping authority. For example, Department of Veterans's Affairs (VA) medical personnel are hired under 38 [U.S.C.](#) and records of that employment are kept under VA's recordkeeping authority. If that person is subsequently employed in the competitive civil service, records of that employment are merged with the VA records in one physical folder, the MRPF. Such MRPFs are owned jointly by OPM and one or more other agencies. In the example, although all the records are physically together, the VA employment records continue to belong to VA while the competitive service records belong to OPM. Only VA can release, amend, or authorize alternative storage requirements for the VA records in the MRPF.

### **Discussion**

To comply with access requirements of the [Privacy Act of 1974](#), the Office of Personnel Management (OPM) has negotiated "access and disposition" memorandums of understanding (MOUs) with more than 20 agencies that share Merged Records Personnel Folder (MRPF) ownership with us. Agency compliance with these MOUs frequently is weak because of the complexity of the agreements, the infrequency with which personnel offices encounter joint file ownerships and the difficulty in recognizing that a joint ownership situation exists. Storage of Official Personnel Folder (OPF) data in a non-paper medium, may further complicate the joint-ownership agreements. This project will define ways in which the various employment records or information can be combined while eliminating the problems inherent in joint OPF ownership.

### **Expected Outcome**

We expect that we will accept and provide Official Personnel Folder (OPF) transcripts of service on paper or in an electronic medium in place of the OPFs we now provide and accept for employees who move between the Office of Personnel Management's (OPM's) and other agencies' records systems. The information documenting all periods of Federal employment will then be integrated into a system "owned" by a single agency.

## **12. *Submission of Electronic Official Personnel Folders (OPFs) to the National Personnel Records Center***

### **Current Situation**

[National Archives and Records Administration \(NARA\), National Personnel Records Center \(NPRC\)](#) is the repository for the paper Official Personnel Folders (OPF) of 80 million former Federal employees. When an employee leaves Federal service, his/her OPF is sent to NPRC. If the person is rehired in Federal service, the new employer retrieves the OPF from NPRC and adds new records to the existing OPF.

### **Discussion**

We do not foresee any effort to convert the 80 million paper Official Personnel Folders (OPFs) in storage at National Personnel Records Center (NPRC) to an electronic medium. Upon completion of the prior projects, agencies should have the capability to produce an employment history as standardized, digitized data. At this stage, we would coordinate with agencies and National Archives and Records Administration (NARA) the most appropriate methodology for agency submission of these data to NPRC.

### **Expected Outcome**

We will work with National Archives and Records Administration (NARA) to issue a standard for submission of Official Personnel Folder (OPF) data to National Personnel Records Center (NPRC) in an electronic medium.

### **13. *Capability to Generate Paper***

#### **Current Situation**

In the project, Approval of Agency Conversion of Official Personnel Folder (OPF) Content to non-Paper Mediums, we anticipated allowing agencies to convert paper OPFs to another storage medium for internal use, but required they produce paper OPFs when transferring the OPF to another Federal agency or National Personnel Records Center (NPRC). The Personnel Action History Transcripts in Lieu of Standard Forms (SFs) 50, and OPF Transcript of Service projects, we anticipated allowing agencies to produce personnel action transcripts and later OPF transcripts, but again with the requirement to provide outputs on paper.

#### **Discussion**

We anticipate that **all** agencies will have at sometime the capability to handle records in a non-paper medium. The Official Personnel Folder (OPF) data element standardization project and the project to define standards for electronic OPF submissions to the National Personnel Records Center will establish Governmentwide requirements for interagency transfer of OPF information in a non-paper medium.

#### **Expected Outcome**

When the preconditions described above are met, we expect to rescind the requirement for the interagency transfer of paper Official Personnel Folders (OPFs). Agencies will transfer most records in alternative mediums using standard formats.

**PART IV — COMPLETION**

Upon completion of the projects described in this Strategic Plan, the paper Official Personnel Folder (OPF) as we know it today will not exist.

The "new" OPF will not be a folder, but rather a collection of information using standard data elements that describe an employment history and support determinations of employee rights and benefits. Agencies will process and maintain the employment history data in a manner and format of agency choosing, but in compliance with Office of Personnel Management (OPM) standards for interagency data transfer.