The National Archives and Records Administration (NARA) requires Senior Agency Officials for Records Management (SAORM) to provide an annual report demonstrating how agencies are handling important records management initiatives as identified by NARA.

NARA uses the reports to determine the overall progress of the federal government in managing its records and the transition away from paper to digital formats, and to identify best practices and model solutions within federal agencies.

On June 28, 2019, the Office of Management and Budget and the National Archives issued a memorandum: *Transition to Electronic Records* (M-19-21) to ensure that all federal records are created, retained, and managed in electronic formats by December 31, 2022. On January 1, 2021, Congress enacted the Preservation of Electronic Messages and Other Records Act, amending 44 U.S.C. Chapter 29, that requires the electronic capture, management, and preservation of such electronic records in accordance with the records disposition requirements of 44 U.S.C. Chapter 33. This year's SAORM report provides an opportunity for agencies to report on plans and progress towards electronic records keeping and preservation under both these requirements, as well as other important records management initiatives.

The reporting period begins on January 10, 2022, and reports are due back to NARA no later than March 11, 2022.

NARA plans to post your 2021 SAORM report on the NARA website upon receipt. Please ensure that your agency's report is a publicly releasable version. This action is in the interest of transparency in government and to promote collaboration and communication among agencies. NARA intends to list any non-responding agencies in a summary report and on the website.

Instructions for Reporting:

- This template covers records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2021, and other aspects of agency records management programs.
- Please be brief and precise in your answers. Limit answers to each question to no more than 500 words.
- Please complete the questions/items below and send the report to rmselfassessment@nara.gov. Include the words "SAORM 2021 Annual Report - [Agency Name]" in the subject line of the email.

- If you are responsible for records management in multiple agencies, components, or bureaus, please determine how you will submit reports to NARA. While NARA prefers a comprehensive report, you may submit separate reports for each component.

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately?**

   Please provide a list, and also indicate any that are new or have been changed due to reorganization or other circumstances.

   Central Intelligence Agency

2. **Has the COVID-19 pandemic impacted policies or practices related to records management at your agency?**

   ☐ Yes
   X No
   ☐ Do not know

   Please explain your response (include details of specific challenges, if applicable):

   While the COVID pandemic has impacted staffing, it has not changed any policies or practices related to records management.

3. **Does your agency have an established information governance framework that integrates records management, data management, and other agency information lines of business? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff, Security, Privacy Officers, and FOIA)**

   X Yes
   ☐ No
   ☐ Do not know

   Please provide details. If 'Yes,' provide details on how your RM program is integrated into this framework. If 'No' or 'Do not know,' please explain your response.

The records management staff and the data management staff are closely aligned, with both reporting to the CDO.

4. **Will your agency meet the goal to manage and preserve all permanent records in an electronic format with appropriate metadata by December 31, 2022? (M-19-21, 1.2)**

☐ Yes
X No
☐ Do not know

Please explain your response (include specific goals, example metrics, and/or challenges):

In May 2021, the agency submitted to the Archivist of the United States a request for exception in implementing M-19-21 due to issues digitizing permanent records. These issues include funding a scanning operation and awaiting official guidance for digitizing these records from NARA. NARA has not responded to the exception request or sought out additional details. The agency is operating under the timeline and parameters outlined in this request, and continues working toward managing all new permanent records fully electronically with appropriate metadata.

5. **Will your agency meet the goal to manage and preserve all <u>temporary</u> records in an electronic format by December 31, 2022? (M-19-21, 1.3)**

☐ Yes
X No
☐ Do not know

Please explain your response (include specific goals, example metrics, and/or challenges):

There are only a few temporary records series that are still managed in paper. These series, currently, only exist in paper and there are a number of resource related challenges to digitizing these records as documented in our exemption request. These paper records are managed and tracked in a system with the appropriate metadata. Efforts are underway for transitioning the business process to capture and manage all records electronically. The agency continues working toward managing all new temporary records fully electronically with appropriate metadata.

6. **Does your agency have plans to submit to NARA a request for an exception to the M-19-21 requirements before December 31, 2022?**

X Yes
☐ No
☐ Do not know

Please explain your response. If 'Yes,' please include an estimate of when you plan to submit an exception and any relevant details. If 'No' or 'Do not know,' please explain your response.

As noted in the response to Question #4, the agency submitted a letter to the Archivist of the United States in May 2021 outlining a number of difficulties implementing M-19-21 and are awaiting a response.

7. **Is your agency utilizing the General Services Administration's Special Item Number for Electronic Records Management ([518210 ERM](#)) 6 to procure solutions to assist in transitioning to an Electronic Environment?**

   ☐ Yes
   X No
   ☐ Do not know

   Please explain your response. If 'Yes,' please include specific examples and how this will support records management processes. If 'No' or 'Do not know,' please explain.

   The agency uses other methods for procuring electronic records management solutions.

8. **Has your agency developed plans to meet the requirements of M-19-21, 1.3 to store temporary records in commercial storage facilities by December 31, 2022?***

   ☐ Yes
   X No
   ☐ Do not know

   *M-19-21, 1.3 includes closing of agency-operated storage facilities and no new transfers of paper records to the Federal Records Centers.

   Please explain your response. If 'Yes,' provide details about the use of commercial storage and other changes related to storage. If 'No' or 'Do not know,' please explain.

   No commercial records centers have been identified that are capable of meeting the storage requirements for CIA's records. An exception request was submitted to the Archivist of the United States for NARA in May 2021 that details challenges related to the requirements of M-19-21, 1.3.

9. **Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?**

   X Yes
   ☐No
   ☐Do not know

   Please explain your response (include details of specific challenges, if applicable):

Our agency has a number of challenges meeting fully-electronic recordkeeping goals with our permanent and temporary holdings. A number of our permanent records series only exist in paper and we cannot digitize these records until we have guidance outlining acceptable scanning practices. We have prioritized digitizing certain long-term temporary records while we await the outstanding NARA guidance for digitizing the permanent records still required for business use. Current resource challenges related to personnel and funding prevent the agency from digitizing temporary records with shorter dispositions because the costs far outweigh the benefits of managing these materials electronically when the disposition falls below 30 years for retention.

10. **NARA is always working on ways we can make your role as the SAORM easier, improve how we interact with you and how you interact with each other. Do you have any suggestions?**

☐Yes
☐No
☐Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):

The agency requests a response back to our exception letter. As noted above, we are operating under the parameters outlines in our letter and we would like to set up a meeting between NARA staff and our senior records staff in order to come to a resolution now that there is less than a year remaining before the original deadline. The agency also requests more progress toward finalized permanent digitization standards for all media types so that we can better staff and develop our scanning program.
We also suggest revisiting the implementation of the Tribal Implications requirement for new schedules. An exception for agencies that likely do not have Tribal involvement or a process that incorporates the certification into ERA instead of requiring separate emails for every schedule submitted would improve the current clunky workflow.