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 (OMB) and NARA issued a memorandum, *Transition to Electronic Records* ([M-19-21](#)), to ensure that all federal records are created, retained, and managed in electronic formats. M-19-21 gave agencies until the end of December 2022 to comply with several specific deadlines.

On December 23, 2022, OMB and NARA issued a new memorandum, *Update to Transition to Electronic Records* ([M-23-07](#)) reinforcing the goals in M-19-21 and extending the 2022 deadlines to June 30, 2024.

Additionally, 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 recordkeeping and preservation under these requirements, as well as other important records management initiatives.

The reporting period begins on January 9, 2023, and reports are due back to NARA no later than March 31, 2023.

NARA plans to post your 2022 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 on our website.

Instructions for Reporting:

- This template covers records management program developments, including those related to the transition to electronic recordkeeping as required by M-19-21 and M-23-07.
- 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 2022 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.

NARA may follow up with agencies to obtain additional information and/or documentation related to responses provided in the template.

As in previous years, we will be validating selected questions and responses from agencies. Your agency may be selected at random to provide additional documentation and/or take part in interviews to discuss your records management program activities.

Provide the following information (required):

- Name of SAORM: **James Biggins**
- Position title: **General Manager**
- Address: **625 Indiana Ave. NW, Suite 700, Washington, DC 20004**

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

N/A

The Defense Nuclear Facility Safety Board (DNFSB) is an independent agency, and all components are covered in this report.

2. **In response to the COVID-19 pandemic, have any of the temporary adaptations to agency business processes become permanent improvements to the management and preservation of electronic records?**

■ Yes
☐ No
☐ Not applicable, no adaptations were needed
☐ Do not know

Please explain your response. (If Yes, include details of the changes and why they became permanent. If No, or Do not know, please explain your answer.)

In response to the COVID-19 pandemic, one of the major permanent improvements is that DNFSB no longer creates analog records. All new records are now managed in an electronic format. A comprehensive inventory of both electronic & hard files with each component of the agency was performed to assist in finding new software to digitize analog records. The new software will be used to convert remaining analog files and add metadata into electronic documents for preservation.

3. **Has your agency taken action to meet the goal to manage, preserve and transfer all permanent records in an electronic format with appropriate metadata by June 30, 2024? (M-19-21, 1.2 and M-23-07, 1.1 and 1.2)**

    ■ Yes
    ☐ No
    ☐ Do not know

Please explain your response with specific actions taken, challenges and results.

The agency's largest component made major progress by eliminating many hardcopy files scheduled for disposition. DNFSB plans to meet the goal to manage, preserve and transfer all permanent records electronically, with appropriate metadata, by June 30, 2024. The agency's internal stakeholders have been consulted. The agency is continuing research to identify and procure a records management software application with the ability to search metadata.

4. **Has your agency taken action to meet the goal to manage and preserve all <u>temporary</u> records in an electronic format by June 30, 2024? (M-19-21, 1.3 and M-23-07, 1.3)**

    ■ Yes
    ☐ No
    ☐ Do not know

Please explain your response with specific actions taken, challenges and results.

DNFSB is in the process of locating the proper software/vendor to implement the electronic records capture processes. As part of this implementation, all staff will be required to capture both temporary and permanent electronic records in the system. Therefore, all records will be preserved in an electronic format by June 30, 2024.

5. **Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 to close agency-operated records storage facilities and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities by June 30, 2024?**

    ■ Yes
    ☐ No

☐ Not applicable, all records are in electronic format
☐ Do not know

Please explain your response with specific actions taken, challenges and results.

DNFSB doesn't have or operate any records storage facilities.

6. **Does your agency have policies and procedures that incorporate records management into the information governance (IG) framework for information, data, and other agency information management? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, Records Management (RM) Staff, Security, Privacy Officers, and FOIA)**

   Note: The incorporation of records management into information governance is part of the framework covered by OMB Federal Data Strategy - A Framework for Consistency (M-19-18) as it provides a vision for managing and using federal data, along with recordkeeping requirements included in OMB Circular A-130, Managing Information as a Strategic Resource.

   ■ Yes
   ☐ No
   ☐ Do not know

   Please explain your response and provide details about how your agency's policies enhance IG and RM's role or relationship to it.

   DNFSB has established a team that includes personnel in records management, IT, contracts, budget and the Executive Secretariate to coordinate and collaborate across functional areas. The team facilitates DNFSB's decision-making about specific tools and systems used and how to strategically leverage information to support workload management, asset management, project management, and more. All agency staff are required to follow DNFSB's Records Management Program Directive D-421.1. This directive established policies and assigns responsibilities for all DNFSB staff. It also provides specifications for decisions and accountability of DNFSBs framework to ensure appropriate evaluation, creation, storage, use, archiving and deletion of information, as required.

7. **Has your agency developed policies and procedures to ensure the capture and preservation of electronic messages, including when hardware or software is upgraded?**

   Note: Electronic messages means electronic mail and other electronic messaging systems that are used for purposes of communicating between individuals. Electronic messages that satisfy the definition of a federal record under the Federal Records Act are electronic records. This includes email, text messages, chat messages, voicemail, social media posts, and other similar applications. (See: Email Management and CFR 1236: Electronic Records Management)

■ Yes
☐ No
☐ Do not know

Please explain your response and include details of your agency's methods to capture and preserve electronic messaging records or challenges preventing you from doing so.

DNFSB implemented a solution to manage permanent e-mail records in the government's cloud-based application. The agency is currently capturing electronic messages generated in the Office 365 Environment. All e-mails are managed under the Capstone Approach, which was approved and has been subsequently implemented. All permanent email records generated by officials identified under the Capstone approach are retained electronically and then forwarded to NARA for archiving. In 2022, the Records Liaison Group recommened reconciling hard and electronic files. The Group is still working on a new schedule for digitizing hard files and fully transitioning to electronic recordkeeping with new software.

8. **Is your agency using or exploring cognitive technologies to identify records and distinguish between temporary and permanent retention?**

    Note: Cognitive technologies generally describe automated technologies that can be applied to recordkeeping practices and procedures. These include Artificial Intelligence, Robotic Process Automation, Software Robot or Bot, and other machine learning technologies.

    ■ Yes
    ☐ No
    ☐ Do not know

Please explain your response. (If Yes, include details on both methods and tools being explored, the level of accuracy and how that level is determined.)

DNFSB is exploring different automated technologies for recordkeeping practices, procedures, and identification of records, and to distinguish between temporary and permanent retention.

9. **Do you as SAORM regularly oversee and evaluate the effectiveness of your records management program and its compliance with statutes and regulations?**

    ■ Yes
    ☐ No
    ☐ Do not know

Please explain your response including what specific measures you have incorporated into the SAORM role.

As the SAORM, I oversee all program directors and senior staff who develop program plans that include metrics and methods to verify effectiveness. The agency primarily measures compliance, statues and regulations by using the RMSA, SAORM and the Federal Electronic Records and Email Management annual reports. An internal controls program assessment/audit was conducted July 12, 2022, to evaluate the effectiveness of the records management program and its compliance with statutes and regulations.

10. Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?

☐ Yes
◼ No
☐ Do not know

Please explain your response and include any comments on existing, pending, and future topics.

There is no specific policy or guidance needed from NARA at this time.

11. Do you have any suggestions for how NARA can better engage with you and your program in your role as SAORM?

xYes
  No
☐ Do not know

Please explain your response and include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions.

There are several things NARA can do to better facilitate records management for small agencies:

We currently have processed records awaiting pickup by NARA. The presence of the boxes of records complicates a space renovation campaign that will result in additional cost to the agency. We have been informed that due to a lack of NARA truck drivers, NARA is unable to pickup the boxes of records.

It is burdensome on DNFSB as a micro agency to have to conduct market research and establish its own electronic records management system. NARA could use it considerably larger resources to develop a government standard system that small agencies can adopt and deploy. It is inefficient and more costly for each small agency to have to identify or develop an electronic records system independently, that still meets the OMB and NARA requirements.

NARA could research, develop, and integrate compliance capabilities into prepackaged software solutions to combine FOIA, Privacy Act, and Section 508 compliance into a standardized electronic records management software system made available to small

agencies. This could drastically reduce the financial and administrative burden on small agencies, ensure more consistent regulatory compliance, and relieve agencies of the audit burden arising from decentralized systems.