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. This year's SAORM report provides an opportunity for agencies to report on plans and progress towards the milestones and target goals in this memorandum, as well as other important records management initiatives.

The reporting period begins on January 19, 2021, and reports are due back to NARA no later than March 19, 2021.

NARA plans to post your 2020 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 both records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2022, 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 2020 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.

Provide the following information (required):

- Name of SAORM: André V. Mendes
- Position title: Department Chief Information Officer
- Address: U.S. Department of Commerce
                                1401 Constitution Ave, NW
                                Washington, DC 20230

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.

   This report covers all Department of Commerce Bureaus, except for the US Patent and Trademark Office, who will report separately.

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

   ☐ Yes
   ☐ No
   ☐ Do not know

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

   COVID-19 has interrupted and delayed some important records management projects, particularly those that require physical access to records, as NARA FRCs were not accepting records for most of the period.

3. **Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)**

   ☐ Yes
   ☐ No
   ☐ Do not know

   Please provide details on what support is needed:

   DOC and its information governance framework stakeholders have worked to establish a Data Governance Council which connect records management, data management and other agency information lines of business. To increase engagement, we are looking to transfer the DOC

Paperwork Reduction Act program and the Records Management Program Office to the Office of the Chief Data Officer.

4. **Has your agency made progress towards managing all permanent records in an electronic format with appropriate metadata by December 31, 2022? (M-19-21, 1.2)**

   ☐ Yes
   ☐ No
   ☐ Do not know

   Please explain your response (include specific goals and example metrics):

   Yes, partially. All permanent records in an electronic format are being managed electronically, however, some DOC Components are still working toward applying appropriate metadata to facilitate transfers to NARA. DOC Headquarters and Bureaus are still actively seeking the infrastructure and will leverage the Microsoft Office 365 suite, and other electronic records management tools to meet this mandate.

5. **Has your agency made progress towards managing all <u>temporary</u> records in an electronic format by December 31, 2022? (M-19-21, 1.3)**

   ☐ Yes
   ☐ No
   ☐ Do not know

   Please explain your response (include specific goals and example metrics):

   Yes, partially. All temporary records in an electronic format are being managed electronically, however, DOC Components are still working toward applying appropriate metadata to facilitate transfer or destruction of records. DOC Headquarters and Bureau are still actively seeking the infrastructure and will leverage the Microsoft Office 365 suite, and other electronic records management tools to meet this mandate.

6. **Is your agency investing resources in IT to support the transition to electronic recordkeeping?**

   ☐ Yes
   ☐ No
   ☐ Do not know

   Please explain your response. If Yes: Please include specific examples of resources and how this will support records management processes. If No or Do not know: Please explain.

   DOC has not deployed a comprehensive DOC-wide strategy, however many offices and bureaus are procuring IT systems to support the transition to electronic record keeping, a few include:

DOC recently purchased a new Electronic Correspondence System (ECS) set to deploy in FY21 Q3/Q4. ECS will be used by all bureaus to support the correspondence life-cycle-management process for all official DOC correspondence/records management and task management in support of the Secretary's Office. ECS will be managed by the DOC Executive Secretary. ECS deployment is limited and is not envisioned to be used as a comprehensive records management solution across the entire organization. DOC Office of General Counsel (OGC) also uses an electronics case management system to support all DOC OGC electronic records management and case management activities within the office of law.

7. **To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)**

☐ Yes
☐ No
☐ Do not know

Please explain your response (include specific goals and example metrics):

DOC plans to evaluate its records storage spaces to achieve compliance with M-19-21, 1.3.

8. **Does your agency have policies and procedures that include documentation to ensure records of <u>newly appointed and outgoing senior officials</u>* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?**

*Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions.

☐ Yes
☐ No
☐ Do not know

Please explain your response (include specific details of policies and procedures):

DOC opted to use the Capstone Approach to Email in which senior officials (capstone officials) are briefed on the approach and their responsibilities. In addition, DOC has employee separation procedures which are specific to senior officials to ensure records are properly captured and/or processed and not improperly removed, altered, or deleted, among other things. In addition, DOC is working to further define and improve this process for efficiency and effectiveness.

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

☑ Yes
☐ No
☐ Do not know

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

(a) The DOC may experience challenges meeting the deadline of December 31, 2022 for identifying, associating, accessing, controlling, segregating, deleting, preserving, and migrating large volumes of unstructured electronic information across disparate systems and functions with adequate controls.

(b) For example, the DOC may experience challenges managing millions of electronic files, controlling and decontrolling sensitive information, culling and protecting personal information, while maintaining business context for staff across email systems, archival collaboration tools, externally hosted cloud-based storage or systems and internal information systems.

 (c) The DOC plans to address these challenges by re-training staff, acquiring and deploying smart tools and systems, establishing new policies, procedures, processes, and business rules utilizing an iterative and phased approach with careful planning, extensive piloting and adjustments.

10. **Do you have suggestions for NARA to improve its engagement with you as the SAORM?**

☑ Yes
☐ No
☐ Do not know

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

DOC appreciates NARA's continued efforts in establishing short and long-term plans regarding NARA's capabilities and readiness to support and accept system to system electronic file transfers and the capacity to accept and store textual (paper) records at the FRC's. Additional guidance would be helpful regarding compliance with electronic and voice messaging, collaboration tools, managing web content as a record, and social media.

The DOC also suggests NARA provide additional how-to-guidance and tool kits with dedicated websites for managing electronic records in cloud environments, Office 365, social media, transferring permanent electronic records, and transitioning paper records from Federal Records Centers to commercial storage centers.