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.

Provide the following information (required):

- Name of SAORM: Bruce M. Downs
- Position title: Principal Deputy Chief Information Officer
- Address: 1849 C Street NW, Washington DC 20240

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

   The Department of the Interior (DOI, Department) Senior Agency Official (SAO) represents the component bureaus and offices in the table below (identified by Bureau/Office name and NARA Record Group).

Departmental Component Office	Record Group
Department of the Interior	RG048
Office of the Secretary	RG048
Indian Arts and Crafts Board	RG435
Bureau of Indian Affairs	RG075
Bureau of Indian Education	RG075
Bureau of Trust Funds Administration	RG075
Bureau of Land Management	RG049
Bureau of Ocean Energy Management	RG473
Bureau of Safety and Environmental Enforcement	RG589
Bureau of Reclamation	RG115
National Park Service	RG079
U. S. Fish and Wildlife Service	RG022
Office of Surface Mining, Regulation and Enforcement	RG471
United States Geological Survey	RG057

   No other DOI Bureaus reporting separately.

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

   X Yes
   ☐ No
   ☐ Do not know

The Department of the Interior released a Digital Signature Directive on March 30, 2020 which established the Department's standards and guidelines for signing electronic documents with digital signatures. The digital signature directive was implemented through formal policy in 2021. DOI also released the following additional policies required for managing electronic records:

- Managing Audio-Video Recording as Federal Records
- Preserving Text and Instant Messages as Federal Records
- Records Transition for Transferring and Departing Departmental Staff

These new policies were essential during the pandemic. Extensive telework required adaptation and adoption of practices moving DOI toward full electronic records management, however considerable work remains. The operating conditions during the pandemic also slowed down our digitization of physical records, delayed progress on records management systems contracts and projects, and impeded FOIA and other reference requests which required access to our physical records at the Federal Records Centers (FRC). Additional constraints were mitigated because our past investments in records management automation allowed us to operate many functions remotely.

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

Both the SAORM and the CDO report directly to the Department of the Interior CIO. Additionally, the Departmental Records Officer (DRO) reports directly to the SAORM. The CIO, CDO, and SAORM are all members of the Information Management Technology Leadership Team (IMTLT), which also includes all Associate Chief Information Officers (ACIOs) from the various DOI bureaus. All significant decisions regarding the DOI Records Management Program are vetted through the IMTLT to ensure alignment with the various DOI lines of business. The CDO chairs the Department's Data Governance Board and shares all Data Management related policies through the IMTLT for increased coordination and awareness as well.

Additionally, our DRO leads a working group comprising all Responsible Records Officers (RROs). This working group collaboratively develops and implements records management policies. This working group also ensures consistent implementation of Records Management Program objectives across DOI and provides a forum for sharing records management best practices across the bureaus.

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

As previously noted, DOI progress towards OMB M-19-21 Goal 1.2 was significantly impeded during response to pandemic. The DOI implemented the eMail Enterprise Records and Document Management System (eERDMS) which is a DOI-wide cloud-based records management system that supports the departmental electronic records program. The modernization and recompetetion of eERDMS has been significantly delayed. The transition of records and associated metadata into eERDMS was also delayed during the pandemic. All bureaus have access to eERDMS and are using its capabilities to maintain records for High Level Officials (HLOs, DOI's equivalent of Capstone Officials) that are no longer employed by the DOI.   The DOI Office of the Secretary has begun capturing Secretarial records in eERDMS that were born electronic and will remain electronic throughout their lifecycle. These efforts will expand to other HLOs in 2022. In addition, the Office of the Secretary completed its first accession of HLO electronic documents to NARA in early 2022. DOI will also begin transferring HLO email archives to NARA in 2022. As these processes are developed and tested, they will be expanded for the use by all DOI bureaus beginning in 2022.

The Bureau of Trust Funds Administration (BTFA) established a high-volume Digital Center of Excellence at the American Indian Records Repository (AIRR) in Lenexa, KS. This center will initially be used to digitize the permanent records currently stored at AIRR and may be available to assist other bureaus in their digitization efforts in the future.

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

The DOI transitioned email and document collaboration services to Microsoft Office 365 (M365) during FY 2020. The DOI continues to explore opportunities to implement emerging M365 capabilities to improve records management, including the capture of appropriate metadata. The DOI has established an integrated team to work through the configuration and testing of M365 to support the management of all electronic records going forward.

The Departmental Records Management Program developed an "Electronic Records Management" policy which is in the final stages of the surnaming process. This policy codifies DOI's commitment to move to electronic records by ensuring that electronic records are maintained in appropriate systems with the proper records management controls, that digitization standards meet CFR requirements, and that Responsible Records Officers (RROs) have the ability to officially lift "print and file" requirements once the appropriate electronic recordkeeping requirements are met. The DOI Records Management Program has also established electronic records assessment metrics which are being completed by all bureaus.

These metrics enable bureaus to measure their migration to electronic records and complete budgetary estimates for digitization efforts.

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

Through the collection of the electronic records assessment metrics described in the response to question 5, the DOI will be able to determine which records will need to be maintained in analog format. Due to the COVID 19 pandemic, DOI was unable to transfer a significant number of permanent records to the Federal Records Centers before the end of 2022 deadline. Additionally, DOI bureaus are examining past practices for retaining records with a permanent retention for periods longer than required by the approved records schedules. As a result, DOI will be requesting an extension to enable these records in their current format to be transferred to the Federal Records Centers and eventually NARA past the 2022 deadline.

Because of the multi-year impact of the COVID 19 pandemic, DOI requests that NARA extend the 2022 deadline by two years. Maintaining the 2022 deadline will impose an unreasonable cost burden on the DOI to digitize a high volume of records that would otherwise have been transferred to NARA in their original format.

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?**

X Yes
☐ No
☐ Do not know

DOI is currently re-competing the eERDMS contract through multiple component awards. The first of these components will provide a Document Review and Production solution for DOI and will prioritize the use of the GSA MAS for this solicitation in 2022. The eERDMS contract also provides for other services like digitization, shredding, and offsite records storage, which will likely utilize this GSA MAS schedule as well. DOI always attempts to leverage this GSA MAS schedule when soliciting for records management services. As noted previously, the award and implementation of these new contracts was significantly delayed during the pandemic response.

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?***

X Yes
☐ No
☐ Do not know

The DOI has established a contract with a NARA approved commercial storage facility. All DOI bureaus can leverage this contract for their individual needs. This service is currently contracted for under the eERDMS contract and as noted in the response to question 7, will undergo pandemic-delayed recompete in the near future.

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

While the DOI is making progress transitioning to electronic records, we face challenges overcoming the resource and budget limitations as well as impacts from the pandemic that have hindered the accomplishment of the 2022 goal. The DOI has invested considerable time and resources working to implement M365 to continue operations during the pandemic and to leverage the records management functionality of M365. DOI continues to work through meaningful functionality gaps within the M365 suite for accessioning and dispositioning records. The Department continues to utilize eERDMS to allow continued migration to electronic records while M365 configuration changes are made, however the records in eERDMS will also need to be migrated to M365 in the future.

To make progress towards the aggressive electronic records management goals, the DOI invested significant resources in scanning software and equipment and has already digitized a significant volume of records. The DOI made the investments and began work in good faith while NARA was finalizing the CFR. We are now concerned that the technical requirements NARA is defining for permanent digitized records may require significant rework for documents that have already been digitized but have not yet been transferred. We are also concerned that we will need to prematurely replace equipment we purchased before proposed standards were developed. Additionally, we are concerned that some proposed standards may not be achievable using equipment and software that is currently commercially available.

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?**

X Yes
☐ No
☐ Do not know

SAORM calls have been more sporadic over the past couple of year, perhaps due to the pandemic. We would like to see these discussions on a more regular basis and possibly work with specific SAORMs to identify strengths, capabilities, and best practices.