



Senior Agency Official for Records Management 2022 Annual Report

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 10, 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 rmsselfassessment@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: Bruce M. Downs
- Position title: Principal Deputy Chief Information Officer
- Address: 1849 C Street NW, Washington DC 20240

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

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

Departmental Component Office	Record Group
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.

1. 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

The Department of the Interior (Department, 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. The Department 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
- Electronic Records Management

These new policies were essential during the pandemic. Extensive telework required adaptation and adoption of practices moving the Department toward full electronic records management, however considerable work remains. The Department transitioned to post-pandemic posture adopting increases in workplace flexibilities including alternative work schedules, telework, and remote work in early calendar year 2022. The pandemic work posture reduced the Department’s workforce generation and reliance on analog records and shifted their focus to effectively using the available electronic systems; the increased workplace flexibilities will lock-in that progress.

As part of our digital signature efforts, the Department also worked with Microsoft to rectify a long-standing defect in Windows which now enables PIV card digital signatures to remain valid as long as the digital certificate was valid at the time a document was signed and Windows is configured to use the timestamping feature that is commercially available. All Federal agencies can benefit from this fix.

2. 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

The Department's progress towards OMB M-23-07 Goals 1.1 & 1.2 was significantly impeded during the pandemic. The operating conditions during the pandemic also slowed down the archiving and digitization of physical records because physical access to workspaces, equipment, and analog records are required for this process.

The Department implemented the eMail Enterprise Records and Document Management System (eERDMS) and Microsoft 365 (M365) as cloud-based tools to support electronic records management. All bureaus have access to eERDMS and M365 and are using those capabilities to migrate to electronic records. While eERDMS has been in use at Interior for several years, the Interior Records Management Program is having to establish new standard operating procedures for the use of M365 to support consistent records management practices across the Department.

The Office of the Secretary has been capturing High Level Official (HLO) records in eERDMS that were born electronic and will remain electronic throughout their lifecycle. The term "High Level Official (HLO) within Interior is equivalent of NARA's Capstone officials and as such the bulk of these records are permanent. These efforts will expand to other HLOs in 2023. In addition, the Office of the Secretary completed its first accession of HLO electronic documents to NARA in 2022. The Department will continue to transfer HLO electronic documents also begin transferring HLO email archives to NARA in 2023. As these processes are developed and tested, they will be expanded for the use by all Interior bureaus beginning in 2024.

The Interior Records Management Program has also established electronic records assessment metrics which are being compiled by all bureaus. These metrics enable bureaus to measure their migration to electronic records and complete budgetary estimates for digitization efforts for both permanent and temporary records. The Department developed a "Scanning Feasibility Application" that can be leveraged by bureaus to quickly assess the scope, priority and cost of records digitization projects based on current contract terms. While use of the tool is not mandatory, bureaus have estimated over 70 projects consisting of nearly 6,500 cubic feet of records that will cost the Department over \$4 million to digitize; this is a fraction of the analog records current in the Department's physical custody, but it points out the significant flaw in the unfunded mandates of M-23-07.

Although the agency has taken actions to meet the M-23-07 objectives, we expect that the digitization of analog records will extend for decades based upon the estimated volume of documents, resources available, and demonstrated performance of digitization.

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 records currently stored at AIRR and may be available to assist other bureaus in their digitization efforts in the future.

3. Has your agency taken action to meet the goal to manage and preserve all temporary 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

The Department transitioned email and document collaboration services to Microsoft Office 365 (M365) during FY 2020. The Department continues to explore opportunities to implement emerging M365 capabilities to improve records management, including the capture of appropriate metadata. The Department has established an integrated team to work through the configuration and testing of M365 to support the management of all electronic records going forward. While the basic records management capabilities exist within M365, the solution is limited in the amount of flexibility and autonomy provided to individual bureaus so Interior is having to work through extensive testing and developing process workarounds to fully leverage the capabilities of M365. After initial testing of the M365 Artificial Intelligence (AI) capabilities for classification, Interior has determined that these capabilities are not fully ready to support the size, variability, and complexity of the Department.

The Departmental Records Management Program released an “Electronic Records Management” policy in 2022, which codified Interior’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 Code of Federal Regulations (CFR) requirements, and that Responsible Records Officers (RROs) have the ability to officially lift “print and file” requirements once the appropriate electronic record keeping requirements are met.

The Department Records Management Program also reviewed the status of bureau meeting the goals of M-19-21 in September of 2022. While each bureau is making significant progress, all are behind in making the full transition and it is clear the Department will not fully make the revised M-23-07 timeline of June, 2024. Based on the metrics presented in September, five of the department’s bureaus and offices have estimated over 900,000 cubic feet of analog records in their possession. The other seven bureaus are still working to finalize their analog record volume, but the volume certainly will be higher than the current numbers. While clearly not all of identified records will be digitized, even a fraction will cost the Department tens of millions of dollars that is not currently in the budget. Although the agency has taken actions to meet the M-23-07 objectives, we expect that the digitization of analog records will extend for decades based upon the estimated volume of documents, resources available, and demonstrated performance of digitization. Even with the ongoing and concerted effort to move as much of these records as possible to NARA and the FRCs, which is currently underway, the Department will need an exception to the June 2024 deadline established in M-23-07.

4. 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

The Bureau of Trust Funds Administration (BTFA) operates the American Indian Records Repository in Lenexa, KS. This agency operated records center currently stores approximately 300,000 cubic feet of Indian Trust and other Tribal related records. The Department intends to continue to operate this records center for the foreseeable future to meet ongoing Indian Trust responsibilities. As noted in the response to question 3, BTFA has invested significantly in high-speed and high-quality scanning technology and processes in order to digitize records currently stored at AIRR. Due to the volume of records at AIRR, this process is expected to extend well beyond the 2024 deadline established in M-23-07.

5. 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 Chief Information Officer (CIO), Chief Data Officer (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

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 Interior bureaus. All significant decisions regarding the Interior Records Management Program are vetted through the IMTLT to ensure alignment with the various Department 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.

Finally, the Department has established a compliance review team that reviews new functionality released in M365 to ensure the Department remains in compliance with Federal regulations as new M365 functionality is released. This team is comprised of representatives from FOIA, legal, records management, PRA, CUI, privacy, and section 508. It is expected that eventually this team will evolve into more of an Information Governance function over time.

6. 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

As noted in the response to question 2, the Department released the following policies that specifically address electronic messages as Federal Records:

- Electronic Records Management
- Preserving Text and Instant Messages as Federal Records
- Records Transition for Transferring and Departing Departmental Staff

The “Electronic Records Management” policy establishes that the Department considers ALL electronic messages as potential Federal Records and ensures Departmental Staff understand their responsibilities to maintain those Federal Records appropriately.

The “Preserving Text and Instant Messages as Federal Records” policy reinforces the principle that text and instant messages must be preserved and produced as Federal Records. This policy also established the acceptable technologies within the Department that can be used for text and instant messages and provides examples of technologies that ARE NOT accepted as appropriate for messaging. In addition, the Department has established a process

to capture all text messages on the mobile devices for High Level Officials prior to them leaving the Department. This procedure also provides for the monthly collection of text messages from the Secretary, Deputy Secretary, and Chief of Staff during their tenure with Interior. The Department is also evaluating technologies that will enable the near-real-time capture of text messages at the enterprise level; however funding for this level of capture is limited.

The “Records Transition for Transferring and Departing Departmental Staff” policy ensures that electronic messages remain within the custody of the bureau or offices that originated the records throughout their life-cycle.

Finally, drafts of the following policies are being reviewed and contemplate release during calendar year 2023:

- Managing Essential Records
- Scheduling Records
- Managing Electronic Calendars as Federal Records

7. 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

The Department is currently utilizing OpenText Auto Classification (OTAC) to evaluate email content to properly classify into our Departmental Records Schedule with limited success. The Department also has tested the “trainable classifier” technology in Microsoft 365 to determine if this can be used similarly to OTAC; however initial testing to apply sensitivity labels proved unsuccessful. The Microsoft trainable classifier solution needs to mature significantly to be usable in a large and complex enterprise environment like Interior. As the current electronic records management contract is recompeted, additional technologies will be evaluated. Until these technologies are fully verified, automated rules are being used to classify some email content, primarily based on sender, recipient, etc.

8. 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

The Departmental Records Management Program conducts monthly meetings with the Responsible Records Officer from all Interior bureaus and major offices. The SAORM regularly participates in these meetings on at least a quarterly basis to stay in tune with individual bureau records management programs. Once each year these meeting are extended to multiple days to provide each bureau an opportunity to raise risks and issues directly with the SAORM. In addition, the SAORM accepts escalations from the Departmental Records Officer when specific bureaus are having resource, budget, or other issues. The SAORM then works with the Associate Chief Information Officer or other bureau management to make sure the issue has appropriate visibility and is being addresses.

Finally, the SAORM, Bureau Directors, Assistant Directors, Principle Deputy Assistant Secretary for Policy Management and Budget, CIO, and associated records officers convened to discuss records management challenges for Indian Records and the volume of records being stored at the American Indian Records Repository and field locations.

9. 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

It would be extremely beneficial if NARA would investigate appropriate resourcing levels with the Appraisal Archivist function within NARA. Interior has been working on our Departmental Records Schedule for several years. Feedback on public comments for one schedule has been completed for over a year and the Consolidated Reply memo has still not been issued. Relatively simple pen & ink changes have also taken months to get finalized; for agencies to be successful at the transition to electronic records it is essential the newer schedules get approved in a timely manner.

Additionally, the notification of “Rescinding FAQ About Changes to Previously Approved Schedule Items” on January 4, 2023 has created concerns across the Interior records management community. One of the main concerns is in updating crosswalks with “big bucket” schedules which previously had been handled as a pen and ink change. It would be helpful if NARA could provide guidance on how such changes can be made going forward without changing the specific disposition authorities, which will significantly impact training and ongoing records management operations within Interior bureaus and offices.

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

Yes

No

Do not know

SAORM calls have been more sporadic over the past couple of years, 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.