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: *Jason Gray*
> - Position title: *Chief Information Officer*
> - Address: *400 Maryland Avenue, SW Washington, D.C. 20202*

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 indicate any that are new or have been changed due to reorganization or other circumstances.

   > The United States Department of Education

2. **Has the COVID-19 pandemic impacted 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):

   > The Department updated its records management telework guidance in response to the COVID-19 pandemic. This guidance includes best practices and guidance on the appropriate creation, maintenance, protection, and retention or disposition of the Department's records while employees are working in a full telework environment. The guidance was made available to all employees as training slides in 2020, and in 2021 was incorporated into all Department training materials.

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)**

   ☐ 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.

> An information governance framework does not currently exist at the Department, but one will be developed soon.

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
   ☐ No
   ☐ Do not know

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

   > In calendar year 2021, the Department continued to update its records management policy to identify the appropriate metadata requirements as mandated by M-19-21, 1.2. The Department invested in technological tools which manage and preserve all permanent electronic records. In the coming months, contingent upon funding, these technological tools will be tested in preparation for implementation of a permanent solution to execute disposition.

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
   ☐ No
   ☐ Do not know

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

   > In calendar year 2021, the Department continued to update its records management policy to identify the appropriate metadata requirements as mandated by M-19-21, 1.2. The Department invested in technological tools which manage and preserve all temporary electronic records. In the coming months, contingent upon funding, these technological tools will be tested in preparation for a permanent solution to execute disposition.

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?**

   ☐ 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.

> The Department has no plans to complete and submit an exception request to NARA, because we don't anticipate a need will arise to do so.

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
    ☐ 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 Department is not utilizing the General Services Administration's Special Item Number for Electronic Records Management (518210 ERM). Solutions for transitioning to an electronic environment have been otherwise procured.

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
    ☐ 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.

    > In 2021, the Department established a Blanket Purchase Agreement (BPA) for use by all the Department's components to use and store records with a commercial storage partner. This facility meets all requirements for the storage of federal records.

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):

> The Department is positioned well for a "day forward" fully electronic recordkeeping environment using our Office 365 platform and additional tools for unstructured information and our conglomeration of systems for structured information. However, there are two challenges that may delay full compliance with electronic recordkeeping per M-19-21: (1) The appraisal process for the Department's simplified retention policies may take longer than the time defined in M-19-21. The retention policies, as they are now, would be extremely difficult to implement in Office 365 and additional tools procured by the Department. (2) The new simplified policies will shorten many records retention periods, resulting in large transfers of permanent information to NARA. If the simplified policies are not approved within an appropriate time frame, the Department will have to have the records digitized for transfer to NARA.

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):

> Please provide guidance on requirements surrounding final implementation of M-19-21, such as expanded guidance on electronic formats, metadata, updated electronic transfers, and digitization. For example, polling federal agencies on the formats of permanent records would allow NARA to create guidance on transferring new or unusual formats prior to receiving transfer requests.