



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):

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| Name of SAORM: Luis Lopez Position title: Chief Information Officer Address: 400 Maryland Ave, SW Washington, DC 20202 |
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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.

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|---|
| The United States Department of Education |
|---|

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.)

The telework guidance created in response to the COVID-19 pandemic has been incorporated into the annual Information Management Training, required to be taken by all employees and contractors. Since most of the Department's staff is still teleworking full time, or teleworking a portion of their time, this guidance has become permanent for the appropriate management and preservation of electronic records.

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.

In calendar year 2022, the Department continued to update its records management policies and procedures to identify the appropriate metadata requirements as mandated by M-19-21, 1.2 and M-23-07, 1.1 and 1.2. The Department invested in, and began testing, technological tools which manage and preserve all permanent electronic records. In the coming months, testing will continue with these tools, which will determine and finalize a permanent solution to execute disposition.

4. 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

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

In calendar year 2022, the Department continued to update its records management policies and procedures to identify the appropriate metadata requirements as mandated by M-19-21, 1.2 and M-23-07, 1.1 and 1.2. The Department invested in, and began testing, technological tools which manage and preserve all permanent electronic records. In the coming months, testing will continue with these tools, which will determine and finalize a permanent solution to execute disposition.

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.

The Department has no agency-operated records storage facilities. All inactive temporary records will be transferred to the Federal Records Center or a commercial storage facility the Department has established a BPA with that meets NARA's standards as set by 36 CFR 1234 by June 30, 2024 as required by M-19-21, 1.3 and M-23-07, 1.3.

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.

The SAORM represents records management functions on the Department's senior-level Data Governance Board. Further, the agency records officer, appointed by the SAORM, represents records management requirements on the Department's information technology governance boards, where data analytical applications (in addition to all IT applications, hardware, and software) are evaluated against 36 CFR 1236 requirements to ensure, at a minimum, records are appropriately identified, accessed, and preserved. The agency records officer is also the Department's CUI program manager, and so the same applications are evaluated against 32 CFR 2002 requirements, which connect to cyber security priorities for information protection. Regarding Privacy, the agency records officer reviews Privacy Impact Assessments for appropriate records, data, and information retention policies.

Regarding FOIA, the agency records officer operates the OCIO FOIA Program and regularly advises the Chief FOIA Officer on related records management issues.

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.

The Department has developed policies and procedures which ensure the capture and preservation of various electronic messages, including email, text messages, chat and other instant messages, voicemail messages, and social media posts. As per agency policy, email messages, voicemail, and text messages are captured in the agency's email system. The agency's instant message system, like the email system, saves electronic messages to the agency's cloud environment, ensuring preservation through software or hardware upgrades. Social Media posts have a separate policy which outlines specific requirements for the capture of posts within the Department's recordkeeping environment, ensuring capture and management of those records by ED, no matter the overall status of the social media account itself. Additionally, the records management team and agency records officer are involved in all software and hardware upgrades via the agency's IT governance review program, where they assess the impact of upgrades and other changes to the records and provide guidance prior to final agency approval.

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.)

The Department is currently exploring the use of various cognitive technologies available in Microsoft's Purview governance solution to identify and tag the Department's records based on the General Records Schedule, the agency's approved GRS 6.1 form, and the Department's record schedules. This solution allows for the identification of records through various avenues, including keyword, number patterns, and document format recognition. As part of this process, the Department has been working toward condensing and simplifying agency records schedules to 25 total items. One simplified schedule was approved in 2022, the other was submitted to the National Archives for review in 2022. Once approved, these new simplified schedules will greatly assist the Department in finalizing requirements in Purview to allow for the identification of temporary and permanent records within the Department's environment.

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.

The effectiveness of the Department's records management program and its compliance with statutes and regulations is evaluated on a biennial basis through the Department's Information Management Strategies (IMS). Upon release, the IMS identifies specific records management requirements to be met by each principal office during the year following release, also providing a grading structure for assessment the next year based on current or updated practices and any improvements or projects that were completed to meet identified requirements. At the end of the assessment year, the records management program produces a final assessment of each program office's status and improvement over that time to be reviewed by the SAORM and senior agency staff. This final assessment additionally identifies ways in which the records management program may be lacking.

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.

None.

11. 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

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

None.