



Senior Agency Official for Records Management 2021 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 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 rmsselfassessment@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:
- Position title:
- Address:
- Office telephone number:
- Email:

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.

EXIM

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 COVID-19 pandemic didn't change any of the EXIM policies or practices related to records management. EXIM has emphasized electronic records management before March of 2020 and continued established Records Management practices during remote operations. Understandably, the time lag experienced in retrieval of paper records from remote facilities increased during the pandemic.

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.

The IT Capital Planning and Investment Control (CPIC) Process at EXIM has begun to align Records Management (RM) with the IT Strategy. CPIC aligns execution of RM with EXIM's Strategic plan and financial resources within the governance framework of the entire agency. RM CPIC input identifies the tactical and strategic goals to ensure the integration of RM within all agency processes and systems, as well as adequate resourcing of RM initiatives. Other components of the agency, such as CFO, CMO, IT Security, Data and Reporting, and the financial and risk management business components incorporate RM aspects within their CPIC input.

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):

*All EXIM **permanent** records are managed and transferred to NARA's custody in electronic format. No permanent records in paper media are accepted for preservation by Information and Records Management Division (IRMD). Any permanent records received by EXIM staff in paper media must be digitized upon receipt. All legacy paper permanent records must be digitized for submission to IRMD." EXIM Records Management preservation archives, Electronic Permanent Records Management System (EPRMS), implements all metadata elements mandated by NARA. An export of records from EPRMS with the attendant metadata suite has been tested in 2019 and found correct and adequate for accession to NARA's custody at the scheduled time in the future.*

The RM goals are expressed in the RM Program Document. Specific operational goals for FY2021 & 2022

- 100% Annual Staff RM Training*
- 100% Training Incoming Employees within 30 days*
- 100% Annual RLO Audit & File Plan review*
- 100% File Plan coverage of EXIM business units*
- Continue to progress to fully electronic records handling – staff education, advocacy with management*
- Maintain destruction procedures for eligible paper records*
- Perform annual review and update of RM Policy & SOPs*
- Perform the annual ingest of permanent electronic records to the EPRMS, including the ingest of the permanent records of the Schedule C appointees that departed at the end of the 45th presidential term.*

5. Will your agency meet the goal to manage and preserve all temporary 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):

EXIM complied with the OMB Memorandum M-19-21 1.3, stipulating that “By 2022, Federal agencies will manage all temporary records in an electronic format or store them in commercial records storage facilities.” EXIM strives to minimize its reliance on paper temporary records by modernization of existing systems. All generated paper temporary records are stored at the Iron Mountain, Inc. commercial records storage facilities. EXIM Records Management (RM) Unit has worked with the Office of the General Counsel to identify the specific temporary records that are required to be retained in paper due to the legal constraints of international agreements and to make progress across the agency in limiting the handling of all other paper temporary records. A concerted effort has been made to advocate with the agency senior management and to educate all agency staff on creation, conversion to, and management of temporary records in electronic format only. The past two years of remote and hybrid – onsite/remote operations accelerated EXIM’s transitioning to managing all temporary records in an electronic format, just as it already manages all the permanent records in an electronic format. EXIM is continuing the transition with all possible speed.

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.

EXIM is compliant with the OMB Memorandum M-19-21 1.3, stipulating that “By 2022, Federal agencies will manage all temporary records in an electronic format or store them in commercial records storage facilities.”

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 SAORM advocates for the records management program ensuring that adequate resources are embedded into the agency's CPIC process.

1) EXIM Senior Agency Official for Records Management (SAORM) carries the overall agency-wide responsibility for records management resources and the implementation of records management initiatives.

2) In 2019 EXIM completed the full-scope management of the agency's permanent electronic records in accordance with Government-wide requirements. All components of the Electronic Records Management System (EPRMS) for the pre-accession preservation of permanent electronic records, including permanent email records are in production. The full Records Management lifecycle capabilities of the OpenText Records Manager (RM) and Retention Policy Services (RPS) are in production with the customized policies for each of the EXIM permanent record types before the calendar 2020.

3) EXIM RM Unit has transitioned its formerly manual records-service request processes to fully electronic mode, engaged in active advocacy of fully-electronic records handling with the agency's senior management, and incorporated information on transitioning to electronic recordkeeping in the annual RM training materials.

4) Agency's records are treated as information resources with appropriate considerations of information access control, privacy, records management, and FOIA support throughout the records lifecycle from creation to disposition.

5) EXIM supports the transition to electronic government, by allowing individuals or entities that deal with the agency the option to submit information or transact with EXIM electronically, when practicable, and to maintain records electronically to the greatest extent feasible within operational and business practices constraints.

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.

EXIM does not use agency-operated records centers, nor does it use NARA Federal Records Centers for new paper records, it relies solely on commercial storage for the diminishing amount of new temporary records it generates in paper form.

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):

While EXIM is well on its way to minimizing creation of any new records in paper form, the most significant challenge to meeting the goal of fully-electronic recordkeeping in the near-term is the volume of existing temporary records with a long-term lifecycle that are in paper format. In order to transition to fully-electronic recordkeeping before the end of the active use or the scheduled post-cut-off preservation term for these records, the records would need to be digitized. Digitization of paper records is constrained by the agency's budgets and resource.

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):

For EXIM, as a small agency, prioritizing and allocating appropriate funding for the modernization of the agency's IT and electronic business systems is one of the critical factors that would enable the agency's success in transitioning to fully-electronic recordkeeping. It may make such prioritization and the funding allocation more feasible if NARA and OMB were to advocate with Congress on the import of the mandate for "managing all temporary records in an electronic format funding as part of Electronic Government initiative".