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 rmselfassessment@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: Howard Spira
- Position title: Senior Vice President and Chief Information Officer
- Address: 811 Vermont Ave. NW, Office 952 | Washington, DC 20571

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.
   EXIM

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 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. **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.
   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 FY2020 & 2021 :
   - *100% Annual Staff RM Training; Automate RM training completion tracking*
   - *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*
   - *Resume destruction of 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.*

4. **Has your agency taken action to meet the goal to manage and preserve all <u>temporary</u> 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.
EXIM is compliant with the OMB Memoranda M-19-21 1.3 and M-23-07 1.3, stipulating that "By June 30, 2024, all temporary records in Federal agencies must be managed electronically to the fullest extent possible. Agencies may continue to produce and store certain records in analog formats if they receive a limited exception from NARA for one of the reasons established in paragraph 1.2, but all other inactive records eligible for transfer after June 30, 2024, must be stored in commercial storage facilities […] Temporary analog records that become eligible for transfer after June 30, 2024 must be transferred to commercial storage facilities that meet NARA records storage requirements"

EXIM strives to minimize its reliance on paper temporary records by modernization of existing systems and processes. All newly generated inactive 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 instantiated 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. Records Management is included in EXIM's Capital Planning and Investment Control process.

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.
All newly generated inactive paper temporary records are stored at the Iron Mountain, Inc. commercial records storage facilities.

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.

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The records function is part of the Office of the Chief Information Officer (OCIO) where the Chief Data Officer (CDO) , Chief Information Security Officer (CISO) and Privacy Officer also reside. Records is integrated into the governance processes for the OCIO from a planning perspective as well as Systems Development Life Cycle perspective as well as routine operational reporting perspective. This facilitates the Records function as a visible and important partner of the overall governance framework for the office and an important element of information governance.

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.

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.)

. EXIM has an annual technology planning process. This technology does not appear in our latest iteration of our technology roadmaps.

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.

As part of the records function there is an annual assessment of agency compliance with key records management program requirements

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.
In FY 2022, as previously, EXIM received effective support from the NARA appraisal and accession archivist staff in development of new Records Schedules, Schedule adjustments, and any other records management questions as necessary. While we rely on being able to consult with NARA for variety of records management questions, there isn't any specific area where we can anticipate needing extensive support.

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.