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 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: Tammy Tippie
- Position title: Acting Chief Information Officer (CIO)
- Address: Office of Technology and Information Management (OTIM), Federal Housing Finance Agency (FHFA), 400 7th Street, Washington, DC 20219

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.

   N/A

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.)

During the pandemic, FHFA Records and Information Management (RIM) team encouraged the conversion of many processes to fully electronic format and instituted the use of digital signatures which has been fully adopted. Another change included fully implementing electronic workflows to obtain senior leadership approvals with document packages aligned with approved record schedules and captured as records upon the electronic workflow completion.

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.

FHFA made a concerted effort to identify, index, and transfer permanent and long-term temporary records to Federal Records Centers (FRCs) for low-cost storage in compliance with M-19-12. To meet the NARA deadline of December 31, 2022, FHFA RIM staff successfully transferred over 1000 boxes of records on November 1, 2022. Approximately 200 boxes contained permanent records on electronic media that were transferred to NARA FRC's electronic vault in Ft. Worth, Texas.

FHFA's permanent email records are all retained and stored in FHFA's email management solution called Evault. Permanent electronic records are managed in FHFA's information management system which integrates the electronic records repository solution called eRIM. FHFA also manages some permanent electronic records throughout their lifecycle on shared drives, data repositories (systems), and other types of storage (*e.g.,* hard drives).

Metadata is captured for all electronic documents and records that are managed in FHFA's fully integrated eRIM module which uses appropriate metadata attributes to support automated management of trustworthy records over time in accordance with applicable requirements for the retention period of the records and eventual disposition or transfer. RIM also participates in the Systems Design and Lifecycle (SDLC) development process to provide input into design and scheduling of new systems.

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.

FHFA and RIM Section staff encourage and support the conversion to electronic processes wherever possible. FHFA manages our email in an electronic vault (Veritas Evault) with retentions assigned to each individual's archive created during the onboarding process and based on the person's role in the Agency and on FHFA's NARA-approved records schedules.

Many temporary electronic records are currently managed in FHFA's information management system which integrates the electronic records repository tool called eRIM. eRIM automates and streamlines end-user responsibilities to identify records, assign records schedules, and securely store declared records for their retention period. FHFA also manages some temporary electronic records throughout their lifecycle on shared drives and in data repositories, where electronic records management is implemented manually.

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.

FHFA will continue our work to identify and intellectually control temporary records collections and prepare them for transfer by the extended M-23-07 deadline of June 30, 2024. FHFA does not have Agency-operated 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.

Located in the Office of Technology and Information Management (OTIM), FHFA's RIM staff works closely with IT Security, Privacy, and FOIA to conduct training, federated searches, enforce Rules of Behavior, and manage incident and breach responses. The Chief Information Officer also serves as both the SAORM and the SAO for Controlled Unclassified Information (CUI). FHFA's RIM team maintains a strong and growing relationship with the CDO who oversees data management, research, and statistics.

FHFA is working towards establishing a comprehensive information governance framework that connects records management, data management, and other agency information lines of business. Chief Data Officer and Chief Information Officer are currently working on a combined Strategic Plan. RIM, Privacy, IT Security, and FOIA have developed a combined incident and breach management plan as well as contribute to *Records Management Self-Assessment* responses.

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.

   FHFA employees and contractors are required to annually review the *RIM Rules of Behavior* which states that device software is updated periodically. With respect to hardware, there is a process to capture information off of devices when hardware is replaced. FHFA's Evault captures all email via journaling and manages it based on the retention category assigned at onboarding (see answer to question 4). Retentions may be updated as needed when a person

is promoted or transferred within the Agency). FHFA uses a commercial archiving tool to automatically capture messages using iPhone-specific applications for storage in the Evault. Office M365 Teams Chats are also assigned the same retention as applicable to the individual's email which are based on FHFA's NARA-approved records schedules and the person's role in the Agency.

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.)

   FHFA's technological platforms continue to evolve, however the Agency is not currently using or exploring cognitive technologies.

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.

   While newly assigned to the role as Acting CIO and SAORM, I have been impressed with the RIM team's overall effectiveness. In 2021, NARA conducted a Multi-Agency Inspection that included FHFA's program. NARA was very complimentary and did not have any recommendations. RIM is addressing the one finding that FHFA should regularly review FHFA's NARA-approved *Comprehensive Records Schedule* (at least every 10 years) by conducting a CRS review this year. FHFA has a records repository, an electronic records management system, and manages our emails electronically. Members of the RIM team have excellent credentials, focus on RIM principles, and expend a great deal of energy and patience to assist, communicate, and teach the art of records management to FHFA's employees and contractors.

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.

FHFA is interested in reviewing the ERM standards and requirements due in 2024 that will allow us to transfer Permanent records into the National Archive's platform.

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.

FHFA sufficiently communicates regularly and directly with NARA.