



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):

- Name of SAORM: William J. Bosanko
- Position title: Chief Operating Officer
- Address: 8601 Adelphi Road, College Park, MD 20740

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.

- Office of the Archivist of the United States
- Deputy Archivist of the United States
- Office of Inspector General
- Equal Employment Opportunity Office
- National Historical Publications and Records Commission
- General Counsel
- Congressional Affairs Office
- Office of the Chief of Staff
- Office of the Chief Operating Officer
- Office of Human Capital

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- Office of Innovation
 - Office of the Federal Register
 - Agency Services
 - Research Services
 - Legislative Archives, Presidential Libraries, and Museum Services
 - Office of the Chief of Management and Administration
 - Office of the Chief Acquisition Officer
 - Office of the Chief Financial Officer
 - Information Services
 - Business Support Services

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 adaptations put in place during the COVID-19 pandemic, related to agency business processes and records management, have not changed. Paper records have been replaced by electronic records with staff filing them in designated locations such as Google Shared Drives and documenting the new filing locations in program offices' file plans.

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.

When CM met Target 1.1 in 2019 it was determined that no additional metadata was required beyond what was automatically captured. This was validated by CM conducting an analysis on file and system metadata and comparing it with NARA Bulletin 2015-04: Metadata Guidance for the Transfer of Permanent Electronic Records. Staff from the Office of the Chief Records Officer also confirmed that appropriate metadata was captured.

CM continues to work with Information Services, Acquisitions, and other stakeholders to refine the processes for managing our permanent records. CM is developing a process to

routinely test the export of permanent records from the records management application to ensure format and metadata compliance.

CM tracks and reports on these activities via the internal controls program. CM also receives a monthly report from the vendor which validates system configuration of the permanent records.

Unless an exception is requested and approved, all permanent records will be managed electronically by June 30, 2024, with appropriate metadata using the same process and system that was put in place in 2019.

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 2021 CM conducted a survey with all program offices to determine the volume of remaining paper/analog records and asked for information related to challenges to moving to fully electronic recordkeeping. With few exceptions, most records series are now managed electronically. CM is following up with all offices to ensure the transition to electronic records is accurately documented in their office file plan and will also follow up with getting approval on records schedules to reflect electronic recordkeeping. The management of temporary records in an electronic records management application has been proposed. While waiting for contractual approvals, CM is working with offices to file these records in designated Google shared drives.

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.

NARA Corporate Records are not maintained in facilities outside of the FRCs. All temporary records will be transferred to FRCs by June 30, 2024.

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 is on the IT Steering Committee. Corporate Records Management (CM), NARA's internal records program, takes part in several working committees and boards related to information governance such as the Technical Reference Model Governance Board, Enterprise Architecture Governance Board, and the Data Governance Board. The CIO, CDO, SAORM, ARO, RM, Security, Privacy, and FOIA all serve on boards in varying levels of engagement.

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.

NARA has a records schedule for electronic messaging records which was approved in 2020, prior to the expansion of the Capstone GRS. When doing so, technical solutions were put in

place to manage messages as email objects in the records management solution. IT, RM, General Counsel, and contractors are constantly assessing the updates to hardware and software that impact the capture of electronic messages for records management and discovery purposes.

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.)

NARA is currently working with the Chief Data Officer to explore the use of cognitive technologies. The RM staff has developed a logic model to help assist in identifying non record and temporary emails from the permanent email records prior to transfer to the National Archives.

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 the SAORM, I receive quarterly reports from the records management program. These reports include activities conducted for compliance and cover policies, operations, and support.

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.

Although there is no specific policy or guidance needed by NARA, resourcing and appropriately aligning responsibilities for full electronic recordkeeping is a challenge. Most records programs do not have the budget or expertise to manage electronic records in a fully automated manner without tight coordination and support from information technology staff. Because this is not always under the SAORM span of control, it would be good to see targeted guidance provided to communities such as information technology, security, and privacy to emphasize the need for collaboration in successfully transitioning to electronic recordkeeping. A standardized set of auditing tools for monitoring the management of electronic records would be useful, particularly if it defines risks and impacts for how those records are managed.

11. Do you have any suggestions for how NARROW 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.

NARA's SAORM is in a unique role of overseeing the government wide and internal records management program. As such, this question is non applicable.