NASA's Response to Managing Government Records Directive
Senior Agency Official (SAO) Annual Report – 2022

I am pleased to provide NASA's SAO Annual Report for 2022.

As we continue a multiyear transformation of the entire Agency IT community, NASA is making great strides toward standardizing across the NASA enterprise all our IT and information management services, including that of records management. We are gearing our efforts for elimination of analog records holdings and improved generation and management of only digital records. Records managers are adjusting to being reorganized with new management but are actively working multi-pronged endeavors to address different aspects of managing our records.

We appreciate your continued leadership of federal agencies as we address challenges in managing electronic records such as those resulting from social media and collaborative tools. I look forward to continued collaboration with you and other agencies in the coming year toward our common goals.

You may contact NASA Records Officer, Patti Stockman, with any questions concerning our submitted SAO Report.

Agency Records Officer:

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Regards,

Jeffrey M. Seaton
NASA Chief Information Officer

NASA Senior Agency Official for Records Management 2022 Annual Report

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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.

   The SAO is responsible for Records Management (RM) in the entire Agency.

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
   X 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.)

   COVID-19 and resultant teleworking did not impact processes for e-records management or preservation.

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)**

   X Yes
   ☐ No
   ☐ Do not know

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

   Last year, NASA transferred nearly 38 GB permanent digital records with appropriate metadata.

At this point, the Agency has not been able to identify any instances of continued generation of analog records. As elaborated below, in 2024, the Agency anticipates ability to identify and address any instances of continued analog record creation.

In 2022, NASA submitted 44 direct transfer requests for approximately 475 cubic feet of permanent analog records from NASA Centers to the National Archives. Between 2018-2022 NASA transferred approximately 7,700 cubic feet from NASA to the Archives.

NASA holds roughly 4,500 cubic feet of potentially permanent analog records in on-site records staging facilities. Records management personnel are working toward established quarterly goals to appraise and disposition them, transferring verified permanent ones to the National Archives.

Two significant initiatives evidencing NASA's due diligence toward the goal of all digital records management are:

- The Agency developed and deployed the Organizational Records Inventory (ORI) application that is currently being populated with initial RM baseline content (ECD FY23 Q4). Every NASA Center is entering local summary information into the ORI including records series content for each Center organization. Once fully populated, NASA will have improved visibility of collections to include holdover analog records as well as new analog records still being created. For each discovery identified, records management professionals will explore with the owning organization whether creation of such analog records is regulatory driven. If it is not, NASA will work with the organization to revise its processes to create and manage only digital records.

- Work continues in support of transferring still imagery records to NARA in 5-year increments. Still imagery digitization for 1959-1963 is nearing completion. Work continues in meta-data assignment and preparations for mandatory shipping protection protocols. Johnson Space Center is coordinating with NARA for a planned transfer target of Q3FY23. NASA also completed in 2022 the migration and digitization of 88,000 additional still and motion imagery assets from two NASA Centers. Challenge: Lack of resources will result in digitization of all the imagery desired requiring nearly a decade to complete.

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)

X Yes
☐ No
☐ Do not know

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

As with its permanent analog records, NASA Centers are working toward quarterly goals for proper appraisal and destruction of temporary analog records stored in onsite staging facilities. During FY22, Centers processed and destroyed 2,710 cubic feet of analog records, leaving approximately 16,000 cubic feet to process. NASA is working towards full divestiture of all legacy temporary analog records and is currently evaluating projected progress by June 30, 2024.

With NASA's enterprise-wide deployment of G5 Office 365, we anticipate a large percentage of the agency's temporary electronic records will ultimately be created and preserved digitally in Office 365 repositories. Therefore, NASA continues its multi-year engagement to design and implement NARA-compliant records management functionality in Microsoft Teams, SharePoint Online, OneDrive, and Exchange. We expect to include both in-place and records repository-based information lifecycle management methodologies that will support the agency's new metadata standard, as well as typical Federal records management reliant activities, such as eDiscovery, FOIA, and Privacy Act processing.

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?**

   X Yes
   ☐ No
   ☐ Not applicable, all records are in electronic format
   ☐ Do not know

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

Agency on-site storage spaces are less than 25,000 cubic feet capacity and do not qualify as a CFR-defined records center. Therefore, and per discussions with NARA's Director of Records Management Policy and Outreach, NASA does not operate any Agency records centers that must be closed under M-23-07. Several NASA Centers have staging facilities where we anticipate records remaining for the duration of their retention periods.

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.

   X 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.

NASA continues the multi-year transformation of Agency functions to enhance efficiencies, service delivery, innovation, and collaboration throughout the Agency and Federal government. The process, discussed in NASA's report of the past two years, involves comprehensive evaluation, and reorganization of existing services and processes to best serve the needs of NASA and the nation.

The Office of the Chief Information Officer (OCIO), responsible for information and records management, has refined and created a new governance structure and boards across IT and information management services. OCIO policies have not yet been updated to reflect the new governance structure. One newly formed board of note is the Technical Review Board (TRB) on which the Agency Records Officer serves as a member. The TRB conducts technical reviews of IT projects to ensure technical integration of OCIO IT service delivery. Through this body, the Records Officer determines adequacy of each project's address of records management concerns and requirements.

The functions of the NASA Data Governance Board (DGB) have been absorbed by the IT Strategy Board (ITSB) chartered in late 2021 as part of the OCIO transformation initiative. It is chaired by Agency CIO who is the SAORM and is comprised of board members and ex-officio members who are top managers from every Agency mission and non-mission organization. The ITSB sets and enforces NASA priorities for managing data as a strategic asset to support NASA in meeting its mission. The board focuses on interoperability and data standards, strategic direction of data and information, data products, as well as providing leadership in standardizing analytical capabilities within NASA.

The Data and Analytics Services (IDAS) organization is responsible for delivering operational platforms and advance interoperable services to enable continuous and accelerated data and information management as strategic resources of NASA's mission. An IDAS goal is facilitation of enhanced data access, inter- and intra-Agency collaboration, policy-driven data governance, efficient information lifecycle management, while leveraging scalable, sustainable infrastructure. IDAS encompasses the functions of Records Management, Forms Management, Paperwork Reduction Act (PRA), the Scientific and Technical Information (STI) Program, Federally Funded Research Publication Access and Library Services, Data Science and Operations, and a Data Stewardship service that we expect will have beneficial synergism with the records management program. Data Stewardship is responsible for enabling the management of data assets through data governance strategies, policies, and standards.

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)

   X 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.

Retention rules for email is documented in the O365 system security plan for permanent and 7-year retention as authorized by NARA in its approval of NASA's application of GRS 6.1.

Currently, NASA records management policy prohibits NASA users from using instant messaging and text messaging services to create business communication records of Agency retention value greater than 180 days. If there are instances of creation of communications with a longer retention value, it is incumbent upon the user to capture the message and any attachments for retention under an approved retention schedule appropriate for the content.

NASA's Employee Guidance in the use of social media provides that social media content generated by employees will be captured for archival purposes when the employee's service with NASA ends.

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
    X 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.)

NASA is employing or exploring numerous cognitive technologies to varying degrees, including those of Robotic Process Automation, Unsupervised Machine Learning, Reinforced Machine Learning, Standard Artificial Intelligence, Open-source Artificial Intelligence, Auto-classification, and Natural Language Processing/Text Analytics. To date, our testing of these capabilities has been limited and not specific to records management.
However, we expect future tests related to RM to be a priority in new enterprise platforms. We are in the very early stages of developing the architecture for how we will configure and implement M365 records management capabilities across NASA. We fully anticipate that one or more of these technologies will enable improved records management through automation in years to come.

9. **Do you as SAORM regularly oversee and evaluate the effectiveness of your records management program and its compliance with statutes and regulations?**

    X Yes

☐ No
☐ Do not know

Please explain your response including what specific measures you have incorporated into the SAORM role.

As the SAORM and NASA's Chief Information Officer, I have established a hierarchy of decision boards that govern information and IT management strategy and governance.
In addition, the NASA Records Officer informs me of anomalies and any operational or compliance issues of which I should be aware. Finally, I review three annual records management reports to NARA that evaluate the Agency's records management program.

10. Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?

X Yes
☐　No
☐ Do not know

Please explain your response and include any comments on existing, pending, and future topics.

NASA understands that NARA is developing a new Bulletin that will bring further clarity to M-19-21 and M-23-07 requirements. We are hopeful that it will clarify in writing what NARA has stated orally that the M-19-21, 1.3 and M-23-07, 1.3 requirement to close agency-operated records storage facilities by June 30, 2024 excludes agency records storage areas of capacities under 25,000 cubic feet described in 36 CFR 1234.30(b). Further, it will be helpful if the anticipated bulletin addresses the expectation that agencies may have to submit exception requests for the transfer of permanent analog records after June 2024 as continuing appraisal of analog records collections identify records that are permanent. It is our understanding for oral NARA discussion that such requests would be expected for large collections and not a trickle of repeated requests.

11. Do you have any suggestions for how NARA can better engage with you and your program in your role as SAORM?

☐ Yes
X No
☐ Do not know

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

NASA has no suggestions for improved engagement.