



## *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.

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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](mailto: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: Linda Dent
- Position title: Deputy General Counsel
- Address: 1775 Duke Street Alexandria, VA 22314

**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.*

National Credit Union Administration

**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

The NCUA used electronic information systems to create, capture, and maintain records for

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many years, and most of the agency’s business processes are electronic. In general, the NCUA’s technology enables staff to access records remotely, which facilitated a smooth transition to the agency’s mandatory off-site posture in March 2020. However, at that time, the NCUA was receiving a few records by mail, e.g., invoices from some vendors. The agency adjusted processes and procedures, and now digitizes mail and receives more correspondence electronically.

**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

The NCUA Records Management Program Instruction, an agency-wide policy, requires the agency to conduct business electronically to the maximum extent possible. As noted above, most NCUA business is conducted electronically. The NCUA has inventoried electronic information systems that house electronic records, including permanent records, and aligned them with applicable records schedules. All but one NCUA office have approved file plans and the records program staff continue to work with Records Liaisons to ensure that any paper records are scanned, sent to the Federal Records Center, or destroyed as outlined by their records schedule.

The NCUA utilizes NARA’s recommended Capstone approach for managing designated officials’ email as permanent records. Non-designated staff’s email is kept for seven years. NARA approved the agency’s Capstone implementation in 2016. NCUA Records program staff is currently processing the new Capstone submission form. Records program staff are responsible for compliance with Capstone, e.g., tracking incoming Capstone officials, and work with Office of Chief Information Officer (OCIO) to implement Capstone. The NCUA has developed procedures for the transfer of Capstone official email to NARA.

The NCUA Records program staff work with the OCIO regarding NARA’s metadata requirements for NCUA’s electronic records. Records program staff participate in the modernization of NCUA electronic systems and of the agency’s email system which provide the functionality for the management of electronic records to include an electronic management labeling system.

In January 2022, NARA issued a MAI Report, Management of Permanent Regulatory Records, dated December 2021. The inspection covered six agencies, including the NCUA, and stated that the “NCUA should be able to effectively meet the requirements of OMB/NARA M-19-21.” M-23-07 extended the deadline to June 2024, and as noted in last year’s SAORM report, NCUA is well positioned to meet the requirements.

**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)**

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- Yes  
 No  
 Do not know

Please see the response to question 3. As in previous years, in 2022, the Records program staff conducted a Records and Information Management (RIM) effectiveness evaluation of an NCUA office. The 2022 evaluation (like the 2021 evaluations) focused on records management in the mandatory off-site posture and found that the office's electronic recordkeeping enables a smooth transition to telework. The agency plans to continue to review office's electronic recordkeeping of both temporary and permanent records.

**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

The NCUA has no agency-operated storage facilities for its records. The agency utilizes commercial records storage facilities to store certain records of its Asset Management and Assistance Center (AMAC). These commercial facilities meet NARA requirements. With the transition to electronic recordkeeping as required by M-19-21 and M-23-07, the NCUA does not anticipate a need for commercial storage in addition to AMAC's.

**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

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*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, who also serves as Senior Agency Official for Privacy and Chief FOIA Officer, is a member of the NCUA Enterprise Data Governance Council (EDGC). The EDGC is comprised of agency managers representing stakeholder offices, including the Office of the Chief Information Officer (OCIO), and supports the NCUA Chief Data Officer to achieve the goals of the agency's Enterprise Data Program. Among its other responsibilities, the EDGC champions enterprise data governance in and across NCUA offices.

All of the NCUA records program staff work in the Office of Information Access Law (IAL) and work on Privacy, FOIA, and Records matters which creates opportunities to further incorporate records management into the NCUA information governance framework.

**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.*

The NCUA has implemented policies and procedures to capture email through secure platforms and allow for the emails to be held for their appropriate retention periods. Further, the NCUA is developing policies and procedures for electronic messages.

**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

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Do not know

**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

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**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

**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

In previous years, NARA allowed NARA staff to participate in other agencies' records trainings such as an agency's Records Liaison training. Our understanding is that NARA staff are no longer allowed to participate in agencies' records trainings. We ask that NARA consider allowing NARA staff to resume participation in agencies' records trainings.