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 and the National Archives issued a memorandum: *Transition to Electronic Records* (M-19-21) to ensure that all Federal records are created, retained, and managed in electronic formats by December 31, 2022. This year's SAORM report provides an opportunity for agencies to report on plans and progress towards the milestones and target goals in this memorandum, as well as other important records management initiatives.

The reporting period begins on January 19, 2021, and reports are due back to NARA no later than March 19, 2021.

NARA plans to post your 2020 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 and on the website.

Instructions for Reporting:

- This template covers both records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2022, and other aspects of agency records management programs.
- 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 2020 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.

Provide the following information (required):

- Name of SAORM:
  John Moses
- Position title:
  Director, Governance and Enterprise Management Division
- Address:
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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?**

   This report covers the entire NRC.

2. **Has the COVID-19 pandemic changed any policies or practices related to records management at your agency?**

   X Yes

   ☐ No

   ☐ Do not know

   The ongoing impact of the COVID-19 public health emergency has significantly impacted the agency's ability to prepare for and execute actions in response to M-19-21. The COVID-19 pandemic has contributed 12 months of delays, and counting, to several projects. The NRC's efforts to assess records in its Regional and Headquarters locations for possible digitization, for instance, has not been possible due to facility closures, travel restrictions, and occupancy restrictions due to the COVID-19 pandemic. Additionally, the agency is currently digitizing analog records, including paper that is stored at the Washington National Records Center. This effort has been impacted because the WNRC is closed and we cannot access these records. Digitization efforts of analog records at NRC locations also have been slowed by the restrictions on occupancy of agency facilities.

3. **Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)**

   X Yes

   ☐ No

☐ Do not know

Records Management, data management, and other agency information lines of business are all supported within the Office of the Chief Information Officer. The CIO and CDO are the same person, who is the Office Director. The SAORM reports directly to the CIO/CDO. The ARO reports directly to the SAORM. RM staff report directly to the ARO.

4. **Has your agency made progress towards managing all permanent records in an electronic format with appropriate metadata by December 31, 2022? (M-19-21, 1.2)**

X Yes

☐ No

☐ Do not know

The agency has attached retention to 100% of its permanent electronic records within the Agencywide Documents Access and Management System (ADAMS), where they are being managed from creation or receipt to disposition. Appropriate metadata, including the required NARA fields, is attached to all permanent and temporary electronic records in ADAMS.

Currently, there are 28 other electronic systems in the agency that contain permanent records. Progress is being made by assessing whether a 'manage-in-place' method is feasible for these systems. For systems that cannot manage-in-place, the retention policies and disposition instructions will continue to be managed by the agency's current records management software. The agency's recently purchased software will also allow us to better manage metadata and retentions for permanent records outside of ADAMS.

5. **Has your agency made progress towards managing all <u>temporary</u> records in an electronic format by December 31, 2022? (M-19-21, 1.3)**

X Yes

☐ No

☐ Do not know

The agency is actively working toward managing all records in ADAMS, including temporary records. As of December 31, 2020, approximately 65% of the agency's records in ADAMS had retentions attached to them, which means they are being managed from creation or receipt to disposition. We have periodic goals set to increase the percentage of records managed in order to meet the December 31, 2022 deadline.

The agency recently purchased software that will allow us to manage-in-place those records that are not in ADAMS, but are in locations such as SharePoint and shared drives (generally short-term records and copies). Additionally, the agency is working with all system owners to ensure their systems are set up to manage the records in the systems.

6. **Is your agency investing resources in IT to support the transition to electronic recordkeeping?**

   X Yes

   ☐ No

   ☐ Do not know

   The NRC has invested resources in IT to support the transition to electronic recordkeeping by purchasing integration services, a scanner and digitization services, and an Information Governance File and Data Analysis tool.

7. **To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)**

   ☐ Yes

   X No

   ☐ Do not know

   The NRC plans to have all paper records in an FRC by December 31, 2022, or digitize them. The agency does not use commercial storage or have an agency-operated records center.

8. **Does your agency have policies and procedures that include documentation to ensure records of <u>newly appointed and outgoing senior officials</u>* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?**

   *Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions.

   X Yes

☐ No

☐ Do not know

The NRC has written policies and procedures to ensure records of newly appointed and outgoing senior officials are properly captured through our Capstone program.

9. **Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?**

X Yes

☐ No

☐ Do not know

The ongoing impact of the COVID-19 public health emergency has significantly impacted the agency's ability to prepare for and meet the goal of fully electronic rulemaking under M-19-21. The COVID-19 pandemic has contributed 12 months of delays, and counting, to several projects. I suggest that NARA consider extending M-19-21 compliance deadlines by at least 12 months or grant agencies compliance waivers. The NRC's efforts to inventory records in its Regional and Headquarters locations, for instance, has not been possible due to facility closures, travel restrictions, and occupancy restrictions due to the COVID-19 pandemic. Additionally, the agency is digitizing analog records, including paper that is stored at the Washington National Records Center. This effort has been impacted because the WNRC is closed and we cannot access these records. Digitization efforts of analog records at NRC locations also have been slowed by the restrictions on occupancy of agency facilities.

Second, I am concerned about the cost and implementation impacts of forthcoming policies regarding digitization, e.g., inventorying the analog records during a pandemic environment, including those at our regional offices; assessing what needs to be digitized; and the effort and expense to digitize. I am concerned with difficulties with meeting NARA's proposed rulemaking requirements for digitizing permanent records and shared those concerns with NARA as agency comments on successive drafts of the digitization requirements.

In 1999, for example, the NRC was given permission from NARA to digitize permanent records and destroy the source records under a NARA-approved records schedule. It would be impractical and unnecessarily costly for the NRC to rescan all permanent records digitized since 1999 (4+ million records) to meet the new standard. The new proposed requirements will be a new burden on resources.

Also, the significant number of "mandatory" and "mandatory if applicable" metadata fields in the proposed rule will pose an increase in workload to capture and validate such metadata and a change management challenge to transition to these requirements from current requirements. For instance, many of the proposed metadata fields are not

required to be captured in the NRC's current system for electronic permanent records. The NRC will face additional costs to implement the capture of these mandatory fields (e.g., to purchase new scanning equipment, provide training, modify data systems, and capture the data). Additionally, NRC receives digitized documents from licensees. These digitization standard changes will impact NRC's current processes and digitization standards when ingesting licensee's digitized data. Finally, requiring licensees to comply with the new mandatory digitization metadata requirements is both impracticable and will likely result in increased costs and burdens on licensees.

Finally, I am concerned with the magnitude of changes that are still needed to ensure that electronic records in the agency's systems are fully managed throughout their lifecycle and with appropriate metadata. While the NRC has had an electronic records management system since 1999, and was honored with the Archivist Award from NARA in 2003, the agency also operates other systems and uses shared services which contain agency records. In addition to the agency's primary electronic records management system, the NRC plans to implement a solution to support distributed electronic records management. I anticipate there will be a sharp learning curve and substantial time needed for the staff to upload and apply the business rules, schedules, and other features required to implement appropriate records management capabilities to the various agency systems.

10. **Do you have suggestions for NARA to improve its engagement with you as the SAORM?**

X Yes

☐ No

☐ Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):

I suggest that NARA increase the frequency of periodic government-wide meetings with SAORMs and AROs (e.g., every fiscal quarter) covering a different topic each time (e.g., best practices in digitization with case studies; handling CUI using Microsoft's MIP; primer on eDiscovery tools, including comparing capabilities of Microsoft's eDiscovery suite and others), as well as convening annual "one-on-one" meetings with the SAORM and ARO of each CFO Act agency so we can hold agency-specific discussions with NARA.