



Senior Agency Official for Records Management 2021 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 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. 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 records keeping and preservation under both these requirements, as well as other important records management initiatives.

The reporting period begins on January 10, 2022, and reports are due back to NARA no later than March 11, 2022.

NARA plans to post your 2021 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 records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2021, 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 rmsselfassessment@nara.gov. Include the words "SAORM 2021 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: Division Director, Governance and Enterprise Management Services Division
- Address: 11555 Rockville Pike, M/S T-6 A10M, Rockville, MD 20852

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 also indicate any that are new or have been changed due to reorganization or other circumstances.

This report covers the whole NRC.

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

- Yes
 No
 Do not know

Please explain your response (include details of specific challenges, if applicable):

The NRC has continued to develop policies and practices related to records management, but the agency has not needed any changes due to the COVID-19 pandemic.

3. Does your agency have an established information governance framework that integrates records management, data management, and other agency information lines of business? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff, Security, Privacy Officers, and FOIA)

- Yes
 No
 Do not know

Please provide details. If 'Yes,' provide details on how your RM program is integrated into this framework. If 'No' or 'Do not know,' please explain your response.

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, Privacy Officer, and FOIA Officer report directly to the SAORM. RM staff report directly to the ARO.

4. Will your agency meet the goal to manage and preserve all permanent records in an electronic format with appropriate metadata by December 31, 2022? (M-19-21, 1.2)

- Yes
 No
 Do not know

Please explain your response (include specific goals, example metrics, and/or challenges):

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.

There are 28 other electronic systems in the agency that contain permanent records. Assessments continue whether a 'manage-in-place' method is feasible for these systems. For systems that cannot manage-in-place, the retention policies and disposition instructions continue to be managed by the agency's current records management software. The agency purchased software in 2020 that will also allow us to better manage metadata and retentions for permanent records outside of ADAMS.

5. Will your agency meet the goal to manage and preserve all temporary records in an electronic format by December 31, 2022? (M-19-21, 1.3)

- Yes
 No
 Do not know

Please explain your response (include specific goals, example metrics, and/or challenges):

The agency is actively working toward managing all records in ADAMS, including temporary records. As of March 1, 2022, approximately 79% of the agency's temporary records in ADAMS had retentions attached to them, which means they are being managed from creation or receipt to disposition. We have set periodic goals to increase the percentage of temporary records managed in order to meet the December 31, 2022, deadline to the extent possible, but don't believe we will achieve 100%.

The agency purchased software in 2020 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); prioritized use cases are ongoing at this time. Additionally, the agency is working with all system owners to ensure their systems are set up to manage the records in the systems, or to establish necessary mitigation strategies for retention policy management.

6. Does your agency have plans to submit to NARA a request for an exception to the M-19-21 requirements before December 31, 2022?

- Yes
 No
 Do not know

Please explain your response. If 'Yes,' please include an estimate of when you plan to submit an exception and any relevant details. If 'No' or 'Do not know,' please explain your response.

The NRC does not expect to be managing 100% of all temporary records in an electronic format by December 31, 2022. We expect to submit an exception for that requirement prior to December 31, 2022.

7. Is your agency utilizing the General Services Administration's Special Item Number for Electronic Records Management ([518210 ERM](#)) 6 to procure solutions to assist in transitioning to an Electronic Environment?

- Yes
 No
 Do not know

Please explain your response. If 'Yes,' please include specific examples and how this will support records management processes. If 'No' or 'Do not know,' please explain.

The NRC purchased integration services, a scanner and digitization services, and an Information Governance File and Data Analysis tool to assist in the transition to an electronic environment.

8. Has your agency developed plans to meet the requirements of M-19-21, 1.3 to store temporary records in commercial storage facilities by December 31, 2022?*

- Yes
 No
 Do not know

**M-19-21, 1.3 includes closing of agency-operated storage facilities and no new transfers of paper records to the Federal Records Centers.*

Please explain your response. If 'Yes,' provide details about the use of commercial storage and other changes related to storage. If 'No' or 'Do not know,' please explain.

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.

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

- Yes
 No
 Do not know

Please explain your response (include details of specific challenges, if applicable):

FRCs have been closed for 2 years and services and access have been cut off or severely limited for the past 24 month, thereby impairing agencies' abilities to comply with M-19-21 by December 31, 2022. NARA and OMB should extend the compliance deadline.

I am concerned about the cost and 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, 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.

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 example, many of the 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.

10. NARA is always working on ways we can make your role as the SAORM easier, improve how we interact with you and how you interact with each other. Do you have any suggestions?

- 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 other tools) 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.