



## *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: Katherine A. Tracy
- Position title: Counsel to Chair Cynthia L. Attwood
- Address: Occupational Safety & Health Review Commission

**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.*

Agency: Occupational Safety and Health Review Commission

**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

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*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 COVID-19 pandemic initially forced the Washington Federal Records Center to close and to reduce staffing, making them unable to receive records shipments. Because of this, we had to temporarily allocate additional safe storage space on our premises for boxes of records that would have otherwise been shipped to the Center. Now that the Center is again open, we can ship boxes to them and will soon no longer need to use the temporary storage space.

**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.*

Our agency is working with our NARA appraisal archivist to assist us in transitioning to a fully electronic format with appropriate metadata for all permanent records by the June 30, 2024 deadline. We look forward to receiving NARA's upcoming regulations on digitization standards for permanent records to be able to achieve our transition.

**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.*

As part of the transition to a fully electronic format for all permanent records, we are also working with our NARA appraisal archivist to assist us in transitioning all temporary records into an electronic format. The majority of our agency's work product is the documentation involved with case adjudication and we maintain such documents electronically in our e-filing system.

**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

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- Not applicable, all records are in electronic format
  - Do not know

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

Our agency does not have an agency-operated records storage facility other than on-site storage but does plan on meeting the requirements of M-19-21, 1.3 and M-23-07, 1.3 and for the transferring all inactive, temporary records to the Federal Records Centers 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.*

As a micro agency with approximately 50 federal employees, the managers of the Commission offices that control records management, data management, and other agency information lines of business are readily in direct communication with each other and assist one another with managing and sharing information within the agency and with stakeholders.

**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

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- 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.*

All email is preserved in an electronic format. The agency's systems generate reports to demonstrate effective controls and compliance with the requirements for managing email records. Email is fully preserved and protected by IT including for departing employees and is fully retrievable for requests. The Commission has a NARA-approved schedule in place to be able to carry out the disposition of permanent and temporary email records using GRS 6.1: Email Managed under a Capstone Approach. We look forward to NARA's upcoming guidance on records created on electronic messaging and collaboration platforms in order to ensure that such records are fully captured as well.

**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.)*

Currently, our agency does not plan on using cognitive technologies.

**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 oversee our agency's records management program by keeping in daily contact with the Records Officer and ensuring that the Federal directives, policies, and procedures are being followed.

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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

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

We would appreciate guidance on NARA's requirements for the digitization of records as well as guidance on records created on electronic messaging and collaboration platforms.

**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

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