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.

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 rmselfassessment@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: Erica Barker
- Position title: Secretary and Chief Administrative Officer
- Address: 901 New York Ave., NW Suite 200 Washington, DC 20268

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately?**

   Postal Regulatory 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?**

   X Yes
   ☐ No
   ☐ Not applicable, no adaptations were needed
   ☐ Do not know

   In response to the COVID-19 pandemic, Commission staff shifted to managing their records electronically and vastly reduced the dependence on paper records.

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

The Commission does not generate new records in paper format and all records are created and managed electronically. The Commission's manages most of its permanent records electronically in its docketing system. These records are generated and stored electronically and managed in accordance with the Commission's approved record schedule. The Commission issued a new records management policy in FY 2022 that addressed the proper management of permanent records in an electronic format. The Commission is committed to meeting the goal of the preservation and transference of all permanent records in electronic format with appropriate metadata by the deadline of June 30, 2024. The Commission returned to its physical office on September 6, 2022 and immediately prepared 40 boxes of permanent records for transfer to NARA. With the return of area staff to the office, a thorough review of permanent records is expected to be completed by the 2024 deadline.

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

The Commission issued a new records management policy in FY 2022 which addressed the proper management of temporary records in an electronic format.

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

The Commission does not have an agency-operated records center.

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
   X No
   ☐ Do not know

   The Commission does not have a formal information governance framework, rather, the records management and information technology teams operate under the same organizational umbrella, reporting to the same executive at the Commission. This ensures that our records management and data management staff regularly coordinate to ensure that electronic records are appropriately identified and formalized throughout the Commission. The Commission plans to develop governance policies and processes starting in FY 2023 after onboarding a new CDO in December 2022. The Commission intends to have a program with comprehensive information governance for agency staff in FY 2024, which includes automated records management within Office 365, with tagging, CUI controls, and more.

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.

   Electronic messaging policies are being drafted and there is a general awareness of both the roles and responsibilities for managing electronic messages and the risk of loss. The Commission transitioned to Office 365 in FY 2022 and issued a Records Management Policy along with training that covered management and preservation of all records, including emails and other electronic messages. Emails and messages within Office 365 are currently preserved through information policies applied by IT in coordination with the SAORM. The

challenges exist with preservation of other electronic messages from mobile devices as the Commission does not currently have mobile device management for government-issued mobile devices and cannot automatically capture the messages for records retention. Instead, it must rely on the individual to properly manage their text messages on their mobile device. In FY 2023, the Commission plans to implement mobile device management which will alleviate a portion of this challenge.

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.)

   The Commission is a very small agency that is working first on training and policies to promote the understanding and obligations of manual records management obligations and is far away from being able to leverage cognitive technologies. The Commission plans to research basic automation solutions within its Office 365 system starting in FY 2023. The Commission intends to have a program with comprehensive information governance for agency staff in FY 2024, which includes automated records management within Office 365, with tagging, CUI controls, and more.

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

   The Commission is a small agency, with 77 FTEs in FY 2022, and the SAORM role is a collateral duty for the Commission's Secretary and Chief Administrative Officer. Yes, as the SAORM, I am directly involved with the records management program including ensuring that the Commission is compliant with statutes and regulations. Moreover, the Commission only has one staff member dedicated to records management and a small administrative team that must complete all the work of the agency from finance (accounting, budgeting, appropriations), IT, human resources, privacy, records management, and operations. As SAORM, I am focused on bringing the Commission up to a level where it has a basic foundational records management program that can then be enhanced and advanced over time.

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

The Commission would benefit greatly from additional guidance on how small agencies such as the Commission who does not have a dedicated records management application and does not intend to procure one and with limited budgetary resources can achieve the goal of fully aligning our systems for the tagging, scheduling, and retention of all internal records.

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

X Yes
☐ No
☐ Do not know

An area where NARA could be of service is in the area of training, specifically for senior executives in small agencies. As a very small agency, the Commission is extremely limited in resources, with its major limitation being the resource of time. Without a dedicated records management team, the Commission and other small agencies struggle to digest the numerous bulletins, guidance documents, and updates with respect to records management. Although NARA provides a host of resources available through its website, the amount of information available is often overwhelming and difficult to navigate. A dedicated forum or webpage with resources aimed at small-agencies and high-level summary documents and requirements would be very much appreciated. We greatly appreciate NARA's dedication to assisting small agencies and have benefited from NARA's coordination and support.