



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: **Luis Campudoni**
- Position title: **Acting Chief of Information/Acting SAORM**
- Address: **US Small Business Administration, 409 3rd Street, SW, Washington, DC 20416**

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

The entirety of the agency (United States Small Business Administration) is covered by this report.

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

- Yes
 No
 Do not know

The COVID-19 pandemic has changed the practices related to Records Management as majority of the SBA staff is currently teleworking which prevents the staff from accessing the temporary paper records physically. This has hampered/stalled efforts to steadily move to complete with electronic record mandates.

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

The agency is currently in the process of developing a coordinated policy to ensure synchronization of efforts across all responsible parties and lines of business. The level of additional administrative support required is being assessed to formulate a formal budget request.

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

All SBA permanent records were transitioned into electronic records before the December 31, 2019, deadline. SBA will be obtaining an electronic recordkeeping system to store all permanent records. The process of the formulation of the procurement requirements will define the goals and metrics.

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

The SBA Records Management Division (RMD) and OCIO are working closely with each HQ program offices and all 68 field offices to digitize all temporary paper records into electronic format.

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

SBA is aware that NARA and OMB are in discussions about potentially extending the deadline date. We will work towards meeting the December 31, 2022, deadline date, however, we are working diligently to make the deadline as close as possible.

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

SBA is working on obtaining an electronic recordkeeping system to store all permanent and temporary records. The process of the formulation of the procurement requirements will define the goals and metrics. The approach to the records management system engagement will have to be methodically establish a strong foundation for current ERM success and define a strategic Roadmap and Program Plan for SBA that will enable it to achieve a sustainable, compliant ERM infrastructure.

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.*

All permanent and temporary inactive paper records will continue to be stored at the NARA FRCs. SBA has an Interagency Agreement with NARA to store and service SBA records.

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

- Yes
- No
- Do not know

As the SAORM for SBA, I see challenges in the level of resourcing allocated to obtain a recordkeeping system to store all permanent and temporary records. Additionally, SBA is dealing with the transition of the SAORM responsibility from one internal organization to the Office of the Chief Information Officer. This includes the transition of the Records Management Division which has been placed on hold pending guidance from the new administration due to the transition. RMD is in the process of updating all the agency-specific record schedules which will not be completed by the December 31, 2022, deadline and all electronic records will be labeled as unscheduled until the draft record schedules are approved by NARA. This is a significant challenge as the temporary paper files will be digitized and some will soon be eligible to be destroyed but will not be able to be destroyed because the current record schedules are not media neutral.

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

The current level of engagement is very helpful.