



*Senior Agency Official for Records Management  
2020 Annual Report*

Provide the following information (required):

- Name of (Acting) SAORM: David Grahn
- Position title: Principal Deputy General Counsel
- Address: U.S. Department of Agriculture  
1400 Independence Avenue, S.W.,  
Washington, D.C. 20250

**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.*

[USDA Organization Chart](#)

*All USDA Agencies and Staff Offices:*

*Office of the Executive Secretariat*

*Assistant Secretary for Civil Rights*

*Assistant Secretary for Congressional Relations*

*Assistant Secretary for Administration*

*Office of the Inspector General*

*Office of General Counsel*

*Office of the Chief Financial Officer*

*Office of the Chief Economist*

*Office of Budget and Program Analysis*

*Office of Communications*

*Office of Partnerships and Public Engagement*

*Office of Tribal Relations*

*Office of Hearing and Appeals*

*Office of the Chief Information Officer*

*Under Secretary of Food Safety*

*Food Safety and Inspection Service*

*Under Secretary for Marketing and Regulatory Programs*

*Agricultural Marketing Service*

*Animal and Plant Health Inspection Service*

*Under Secretary for Natural Resources and Environment*

*Forest Service*  
*Under Secretary for Food, Nutrition, and Consumer Services*  
*Food and Nutrition Service*  
*Center for Nutrition Policy and Promotion*  
*National Agricultural Library*  
*Under Secretary for Farm Production and Conservation*  
*Farm Service Agency*  
*Risk Management Agency*  
*Natural Resources Conservation Service*  
*Under Secretary for Trade and Foreign Agricultural Affairs*  
*Foreign Agricultural Service*  
*Codex Alimentarius Commission*  
*Under Secretary for Research, Education, and Economics*  
*National Institute of Food and Agriculture*  
*Economic Research Service*  
*National Agricultural Statistical Service*  
*Agricultural Research Service*  
*Under Secretary for Rural Development*  
*Rural Utilities Service*  
*Rural Housing Service*  
*Rural Business Cooperative Service*

**2. Has the COVID-19 pandemic changed any 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):*

*Yes. The COVID-19 pandemic significantly affected records management operations. Physical records management disposition could not occur as a result of the maximum telework posture and closure of Federal Records Centers for all but emergency requests. The pandemic also forced a shift toward electronic business processes, such as increased adoption of electronic signatures, and virtual collaboration tools such as Microsoft Teams.*

**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)**

- Yes

No

Do not know

*Please provide details on what support is needed:*

*The U.S. Department of Agriculture (USDA) is in the process of developing an information governance framework by connecting key stakeholders, but no formal framework is yet in place. In August of 2020, the USDA records management program was realigned under the General Counsel's (GC) newly established Office of Information Affairs (OIA). The GC was then appointed the Senior Agency Official for Records Management (SAORM). As the GC position was vacated in December 2020, the Principle Deputy General Counsel is serving in the role of Acting SAORM.*

*This strategic positioning has greatly increased the visibility of, and senior leadership support for, the records management program. Under the Acting SAORM's leadership, Records Management has re-established critical relationships with the Office of the Chief Information Officer (OCIO) to accomplish mutual goals. For example, Records Management collaborated with OCIO to implement Capstone and research an information governance tool to increase USDA compliance with electronic recordkeeping requirements in M-19-21.*

**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)**

Yes

No

Do not know

*Please explain your response (include specific goals and example metrics):*

*Yes. USDA implemented Capstone in April 2021 and is currently researching an information governance tool. However, it will be necessary to create a strategic plan for USDA compliance challenges with electronic recordkeeping requirements in M-19-21. It is likely that any mitigation will extend beyond the December 31, 2022 deadline.*

**5. Has your agency made progress towards managing 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 and example metrics):*

*USDA has conducted an initial assessment on the status of records scheduling, including temporary records schedules. It will be necessary to create a strategic plan for USDA compliance challenges with electronic recordkeeping requirements in M-19-21. Again, it is likely that any mitigation will extend beyond the December 31, 2022 deadline.*

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

Yes

No

Do not know

*Please explain your response. If Yes: Please include specific examples of resources and how this will support records management processes. If No or Do not know: Please explain.*

*Yes. USDA has invested IT resources to implement Capstone and is working on investing in an information governance tool to support the transition to electronic recordkeeping.*

**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

No

Do not know

*Please explain your response (include specific goals and example metrics):*

*USDA plans to evaluate its records storage spaces to achieve compliance with M-19-21, 1.3.*

**8. Does your agency have policies and procedures that include documentation to ensure records of newly appointed and outgoing senior officials\* 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.

- Yes  
 No  
 Do not know

*Please explain your response (include specific details of policies and procedures):*

*There is a regulation in place addressing how to manage and capture the records of departing senior officials. However, more training and collaboration is needed to ensure that the policy and procedure is applied consistently across the Department, including awareness about senior official status and out-processing requirements. The Department will be updating the DR3099-001 Records Management Policy for Departing Employees, Contractors, Volunteers and Political Appointees.*

**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):*

*There are several challenges at USDA for meeting the goal of fully electronic recordkeeping, including, but not limited to:*

- Delayed inventories and evaluations of business processes as a result of being in a “maximum telework” posture for more than a year;*
- Interrupted transfer and accession activities as a result of several Federal Records Center closures;*
- Identification of funding sources to ensure continued support of the M-19-21 mandates; and*
- Retraining AROs to develop the additional skills relative to the M-19-21 mandates.*

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

- Yes  
 No  
 Do not know

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

*Both the NARA Appraisal Team and supervisor, and the Federal Records Center Account Representative have been very responsive and supportive of the USDA records management program. We appreciate their continued willingness to partner with our agency to fill key vacancies, improve the skill set of our existing Agency Records Officers, and update file plans and schedules.*