



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. This year's SAORM report provides an opportunity for agencies to report on plans and progress towards the milestones and target goals in this memorandum, 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 both records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2022, 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: Dr. Christina Handley
- Position title: Chief Information Officer and Chief Data Officer
- Address: Office of the Comptroller of the Currency
400 7th St., SW
Washington, DC 20219

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.

Office of the Comptroller of the Currency

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):

Agency personnel were provided additional information on using remote access tools and leveraging technology instead of printing hard copies.

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, Security, Privacy Officers, and FOIA)

- Yes
- No
- Do not know

Please provide details on what support is needed:

The information governance framework is established through policies and procedures. Additionally, the SAORM is also the CIO/CDO/SAOP.

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 and example metrics):

All permanent electronic records are now maintained with metadata in a certified electronic recordkeeping system. We are digitizing our Corporate History Files that have many years of paper history (project delayed due to COVID-19). We are working to determine if an electronic solution is legally feasible for some paper records that legally require seals or notarization. Per M-19-21 section 2.1, we will work with NARA if exception is necessary.

5. Will your agency meet the goal to manage and preserve 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):

The majority of all agency business is conducted in electronic format. The seals/notarization requirement also pertains to some temporary records. We are working to determine if an electronic solution is legally feasible for these temporary paper records as well. Per M-19-21 section 2.1, we will work with NARA if exception is necessary.

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

We are working to determine if an electronic solution is legally feasible for some paper records that legally require seals or notarization. Per M-19-21 section 2.1, we will work with NARA if exception is necessary.

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 (include specific goals and example metrics):

We plan to review this SIN before moving forward with any ERM replacement solution.

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

Yes

No

Do not know

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

The agency only uses Federal Records Centers.

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):

We have challenges for current paper records that legally require seals/notarizations.

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):

SAORM appreciates NARA's availability when complex questions arise.