



Senior Agency Official for Records Management 2023 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 8, 2024, and reports are due back to NARA no later than March 8, 2024.

NARA plans to post your 2023 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 rmsselfassessment@nara.gov. Include the words “SAORM 2023 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: Kristen Baldwin
- Position title: Chief Information Officer

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.

Office of the Comptroller of the Currency (no changes)

2. Will your agency 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
 Not applicable, all records are in electronic format

If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)

OCC has completed this action. There is a very small volume of records that legally require seals/notarizations. We are internally reviewing options and we will work with NARA to file an exception, as appropriate.

3. Will your agency 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
- Not applicable, all records are in electronic format

If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)

OCC has completed this action. There's a very small volume of records that legally require seals/notarizations. We are internally reviewing options and we will work with NARA to file an exception, as appropriate.

4. 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 by June 30, 2024? (Choose all that apply)

- Yes
- No
- Not applicable, my agency does not have agency-operated records storage facilities
- Not applicable, all records are in electronic format

If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)

5. Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 and transfer inactive records to a NARA Federal Records Center (FRC) or commercial storage facilities by June 30, 2024? (Choose all that apply)

- Yes, we will transfer to the FRC
- Yes, we will transfer to commercial storage facilities
- No
- Not applicable, all records are in electronic format

If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)

OCC will meet this action. OCC only uses Federal Records Centers for storage.

6. **Does your agency have a Data Management Strategy that includes records management principles?** (<https://www.archives.gov/files/records-mgmt/resources/cdo-rm-assessment-report.pdf>)

- Yes
 No

Please explain your response.

Yes, as the OCC Data Strategy and Policy addresses records management as a key component of OCC's Data Lifecycle.

7. **In your role as SAORM, do you meet with your Agency Records Officer(s) to discuss the agency records management program's goals?**

- Yes
 No
 Not applicable, my agency does not currently have a designated Agency Records Officer

Please explain your response. (If 'Yes,' please include how often, a description of topics, and outcomes of these meetings. If 'No,' please explain why not.)

Yes. The quarterly meetings encompass a comprehensive discussion of pertinent subjects, including ongoing initiatives in records management, strategic planning, identification and resolution of issues and roadblocks, and the alignment of records management objectives with broader information technology strategies. The outcome of these sessions involves the resolution of identified issues and strategic planning.

8. **Has your agency incorporated NARA's digitization standards into your Information Resource Management (IRM) Strategic Plan? (44 U.S.C. 3506(b)(2) and OMB Circular A-130)**

- Yes
 No
 Not applicable, my agency is not currently digitizing records

Please explain your response. (If 'Yes,' what steps have been taken? If 'No,' why not?)

No. At the present time the OCC has not incorporated NARA's digitization standards into an Information Resource Management (IRM) Strategic Plan. The OCC has incorporated the standards in Subpart D—Digitizing Temporary Federal Records into agency policy/process, however, we have collaborated with NARA and other agencies to assess the quality management and validation of digitization procedures, especially for

small scale agencies like OCC. This collaboration may lead to potential revision of OCC policy. Looking ahead, OCC aims to collaborate with OCC business unit workgroups in 2024 to identify permanent records that need digitization. If required, they will determine the volume and location for the digitization process.

9. Does your agency have a social media strategy that includes capturing and maintaining records in accordance with records management statutes and regulations?

- Yes
 No

Please explain your response.

Yes. The agency maintains a social media calendar, documenting the topics and dates of all posts and all posted content and iterations of social media postings are properly managed as Federal records.

10. Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?

- Yes
 No

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

No support needed at this time.

Kristen Baldwin
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