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: Anna Canfield Roth
- Position title: Assistant Secretary for Management
- Address: 1500 Pennsylvania Avenue, Washington, D.C. 20005

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

Bureaus covered by this report: Departmental Offices (DO), Treasury Inspector General for Tax Administration (TIGTA), Special Inspector General for the Troubled Asset Relief Program (SIGTARP), Special Inspector General for Pandemic Recovery (SIGPR), Office of the Inspector General (OIG), Community Development Financial Institutions Fund (CDFI), and Office of Foreign Assets Control (OFAC).

Bureaus which will be reporting separately: Office of the Comptroller of the Currency (OCC), Bureau of the Fiscal Service (BFS), Internal Revenue Service (IRS), U.S. Mint, Bureau of Engraving and Printing (BEP), Alcohol and Tobacco Tax and Trade Bureau (TTB), and Financial Crimes Enforcement Network (FINCEN).

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?**

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

Please explain your response. (If Yes, include details of the changes and why they became permanent. If No, or Do not know, please explain your answer.)

Treasury's records management policies and practices have remained the same throughout the pandemic.

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

Please explain your response with specific actions taken, challenges and results.

In collaboration with Treasury DO and OCIO, we have launched a solution for permanent electronic record managements system: OneCT. OneCT is a case management system that allows senior management to sign and approve various documents such as reports, memoranda, and important policy decisions. This system is acting as Treasury DO's permanent records repository for many program offices. This system meets metadata requirements that make records easily retrievable and transferable to the National Archives once retentions dates are met. However, Records Control Schedules need to be updated before Treasury can begin to accession inactive permanent electronic records to the National Archives. Treasury DO is working with program offices to update older record schedules that include permanent records. Treasury DO is in the process of drafting policy for the digitization of permanent records, however that will not be finalized until NARA releases the regulation).

Treasury DO has an approved NARA Form 1005, and ensures that all Capstone Officials within DO have permanent retentions enabled for their email accounts. We are reviewing and updating DO's Capstone Officials list to resubmit to NARA to ensure all newly established offices are included.

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

Please explain your response with specific actions taken, challenges and results.

Treasury has made progress towards this goal by utilizing existing technology and tools to create, capture, and maintain electronic records with appropriate metadata. Currently, bureaus either utilize technology which creates appropriate metadata for records or are in the process of procuring technology for this goal. However, Records Control Schedules need to be updated to reflect current active temporary records as well as media neutrality before Treasury can begin to dispose of temporary records that meet retention requirements. Treasury DO is currently working with program offices to inventory their permanent and temporary records and begin the process of revising/updating Record Control Schedules.

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

Please explain your response with specific actions taken, challenges and results.

Treasury DO doesn't have any agency operated records storage facilities.

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.

X Yes
☐ No
☐ Do not know

Please explain your response and provide details about how your agency's policies enhance IG and RM's role or relationship to it.

Treasury has an established a Data Governance Board that serves as a vital link among Treasury-wide management functions and provides coordinated leadership, direction, and guidance on matters related to the gathering, analysis, sharing, use, and dissemination of data and information. The Board's members include Treasury's Chief Data Officer, the Deputy Chief Financial Officer, the Chief Information Officer, the Deputy Assistant Secretary for Privacy, Transparency, and Records[1], the Chief Evaluation Officer and Deputy Performance Improvement Officer, and the Chief Statistical Official.

In addition to the Data Governance Board, the Office of Privacy, Transparency, and Records works closely with the Office of the Chief Information Officer and Treasury program offices in the development and implementation of Treasury systems, records retention policies, as well as policies, procedures, and processes for new and modified information systems.

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)

   XYes
   ☐ 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.

Treasury DO has an approved NARA Form 1005, and ensures that all Capstone Officials within DO have permanent retentions enabled for their email accounts. We are reviewing and updating DO's Capstone Officials list to resubmit to NARA to ensure all newly established offices are included.

Treasury DO is currently planning policy and procedures for other types of electronic messaging, including text messages, chat messages and social media. The Records Management team is

coordinating with the SAORM, General Counsel and OCIO to satisfy NARA Bulletin 2023-02.

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.)

   Treasury DO is not currently using cognitive technologies to identify records and distinguish between temporary and permanent records.

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

   Please explain your response including what specific measures you have incorporated into the SAORM role.

   As Treasury's SAORM, I meet with and receive regular updates from Treasury's records management staff. I monitor and evaluate the effectiveness of Treasury's records management program through Treasury's program and personnel performance management processes. Through the Office of Privacy, Transparency, and Records, I oversee the development of Treasury's records management policies and procedures.

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

☐ Yes
X No
☐ Do not know

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

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

Please explain your response and include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions.

Treasury recommends that NARA hold regular (virtual) meetings with agency SAORMs and/or one on one meetings with agency SAORMs and Records Officers to discuss best practices and to brainstorm solutions to challenges in implementing electronic recordkeeping requirements. NARA should also consider publishing samples of guidance that agencies could provide to employees, contractors, senior executives, and appointees as part of an overall effort to transition to electronic recordkeeping.