



## *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.

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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](mailto: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: James Strawley
- Position title: Deputy Staff Director

**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.*

*United States Sentencing Commission*

**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

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

**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.)*

**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.)*

**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

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No

*Please explain your response.*

**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.)*

**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?)*

*The Commission does maintain a plan for Information Resource Management and does account for all requirements pertaining to its record keeping function. The requirements at 44 U.S.C. 3506(b)(2) however apply to executive branch agencies. The Commission is a judicial agency and therefore those statutory requirements do not apply.*

**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.*

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

Yes

No

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

*It often appears that interactions with NARA, as well as guidance received from NARA, occurs with a one-size fits all model. While I recognize that NARA interacts with many agencies that are large, wide-spread and comprised of numerous units, divisions or offices, the Commission is a small agency with a staff of less than 100 all located in one suite. While the small size of the Commission brings advantages to its record keeping mission, it also has some challenges. It is often the case that NARA provides guidance and expectations that simply do not fit for a small agency's structure and/or budget. As just one example, the permanent record regulations NARA seems to envision a multi-person and multi-tiered records staff with several layers of cross-checking by different personnel. For a small agency, such a records staff is neither feasible nor practical. As another example, my recent interactions with NARA demonstrate a lack of understanding or flexibility to recognize that certain common procedures may not work in a small agency, with NARA staff expecting or suggesting the same systems or procedures required for or available to monolithic agencies houses in the Executive Branch. Similarly, NARA staff seemed to have little understanding of the unique qualities and requirements of a Judicial Branch Agency, again proceeding in the same manner one would expect for a large Executive Branch Agency.*

*It would be helpful to the extent possible that new NARA guidance accounts for the small size and structure of some small agency with a small records management staff.*