



Senior Agency Official for Records Management 2019 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 13, 2020, with reports due back to NARA no later than March 13, 2020.

NARA plans to post your 2019 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 records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2019.
- 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 2019 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: Jason Gray
- Position title: Chief Information Officer
- Address: 400 Maryland Ave SW, Washington, DC 20202

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.**

Please provide list: The United States Department of Education.

2. **Is your agency managing all permanent electronic records in electronic format as of December 31, 2019? (M-19-21, 1.1)**

Yes

No

Please explain your response: As of December 31, 2019, the Department leveraged: (1) Office 365 to create, collect and manage all unstructured information created by principal offices to execute day to day operations, which include Capstone Officials; and (2) electronic information systems to enable digital processes for mission functions that generate permanent records. In calendar year 2019, the Department began replacing traditional file plans with principal office “Data and Information Governance Strategies,” which will inventory all unstructured and structured records. Additionally, a draft directive designed to codify M-19-21 requirements as Department policy will be issued to formalize the transformational changes called for in M-19-21.

3. **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

Please explain your response (include specific goals and example metrics): In calendar year 2020, the Department is updating its records management policy to identify and mandate the appropriate metadata requirements as mandated by M-19-21, 1.2.

4. Has your agency made progress towards managing all temporary records in electronic format? (M-19-21, 1.3)

Yes

No

Please explain your response (include specific goals and example metrics): As of December 31, 2019, the Department leveraged: (1) Office 365 to create, collect and manage all unstructured information created by principal offices to execute day to day operations, to include temporary program files; and (2) electronic information systems to enable digital processes for administrative support services.

5. Have you, as the SAORM, taken steps to ensure that your records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures? (M-19-21, 1.4)

Yes

No

Please explain your response (include specific goals and example metrics): The Department's Information Management Program is staffed by both Federal (3) and contractor (4) staff that completes tasks defined by programmatic strategic objectives that align to annual performance plans and contractor statements of work. With those resources the Program made substantial progress with implementing OMB directive M-19-21, which included: (1) A draft replacement directive for OM 6-103 was completed and defines the way in which the Agency Records Officer ensures complete and accurate compliance with records management laws and regulations. This new policy is also the framework for how the Department will implement OMB's paperless government directive (M-19-21). (2) Draft simplified retention policies which will be implemented in Office 365 once they are approved. These policies will ensure electronic records are being appropriately managed in an electronic environment.

6. If applicable, have you identified all agency-operated records centers and made plans to either close them before 2022, or have you submitted a request to NARA for an exception? (M-19-21, 1.3)

Yes

No

Please explain your response (include specific goals and example metrics): The Department does not have agency-operated records centers, but leverages a combination of commercial and Federally operated facilities.

7. Does your agency have procedures that include documentation to ensure records of 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

Please explain your response (include specific details of procedures): All new employees receive a records and information management briefing during orientation. Capstone Officials are given an additional briefing by the Agency Records Officer to reinforce the requirements associated with creating, receiving and managing permanent records. Additionally, Capstone Officials are issued regular reminders of their responsibilities throughout their tenure. At the end of tenure, all employees must certify their records have been identified, captured and only their own personnel-related information may be copied and removed upon separation.

8. Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?

Yes

No

Please explain your response (include details of specific challenges, if applicable): The Department is positioned well for a “day forward” fully electronic recordkeeping environment through the use of our Office 365 platform for unstructured information and our conglomeration of systems for structured information. However, there are two challenges that may delay full compliance with electronic recordkeeping per M-19-21: (1) The appraisal process for the Department’s simplified retention policies may take longer than the time period defined in M-19-21. The retention policies, as they are now, would be extremely difficult to implement in Office 365. (2) The new simplified policies will shorten many records retention periods, resulting in large transfers of permanent information to NARA. If the simplified policies are not approved within an appropriate time frame, the Department will have to have the records digitized for transfer to NARA.

9. Do you need support from NARA to ensure a successful transition to fully-electronic recordkeeping?

Yes

No

Please provide details on what support is needed: The Department will need active support from NARA's appraisal team to ensure the draft simplified policies are reviewed and approved by the Archivist of the United States within an acceptable time frame.