



Senior Agency Official for Records Management 2022 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 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 rmsselfassessment@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: Lisa Crunk
- Position title: Records Manager / ARO
- Address: 2300 Clarendon Blvd, Suite 500, Arlington, VA 22201

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

American Battle Monuments Commission.

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
 No
 Not applicable, no adaptations were needed
 Do not know

ABMC is an international organization with 26 cemeteries across the globe. It has been working in a nearly 100% electronic environment for years and as such did not need to adopt any measures in order to manage and preserve its records. All electronic records are managed in a cloud environment across a SharePoint site.

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)

- Yes
 No
 Do not know

ABMC has transferred to NARA all the permanent physical records held at its headquarters location in Arlington, VA. It is currently in the process of shipping permanent records from the 26 overseas cemetery sites in order to meet the revised deadline of June 30, 2024.

All subsequent transfers will be in electronic format only and will include the required metadata.

4. Has your agency taken action to 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
 Do not know

All temporary records are currently managed in an electronic format. The Agency no longer retains physical records other than reference copies.

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?

- Yes
 No
 Not applicable, all records are in electronic format
 Do not know

The Agency does not retain any physical records at a records storage facilities, either Federal or commercial. All current records are managed electronically.

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](#).

- Yes
 No
 Do not know

The Agency's records manager and records management program fall under the purview of the CIO. As a small agency, the SAORM, records manager, ARO, and FOIA officer are all the same individual. As part of ABMC's Information Resource Management (IRM) Strategic Plan; information security for all records, regardless of format, are incorporated into Agency recordkeeping practices. Requirements will include the protection of information in a manner commensurate with the risk that would result from unauthorized access, use, disclosure, disruption, modification, or destruction of such information.

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](#))

- Yes
 No
 Do not know

ABMC is leveraging Microsoft 365 cloud services to capture and preserve emails with Microsoft Exchange Online, telephone voicemails and chat messages with Microsoft Teams.

Apple currently does not offer an API to capture and preserve text messages and iCloud iMessages and export to the Agency's online archives storage. As a temporary workaround, the IT teams performs backups of GFEs for capstone officials. ABMC is monitoring NARA and other regulatory agency guidance for suggestions on efficient and cost effective tools that work with Apple and Microsoft to capture text messages.

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
- No
- Do not know

ABMC intends to use Microsoft 365's RM module, Purview, as its electronic records management system. This system is still in the planning phase for the Agency and no determinations have been made as to whether cognitive technologies will be utilized as part of the this product or in addition to it to 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?

- Yes
- No
- Do not know

FY23 is the first year that the Agency has an approved records management policy and program. Developing key metrics associated with its evaluation on an annual basis are part of ongoing efforts to continue to develop the program. Program evaluations will be a part of the program going forward.

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

- Yes
- No
- Do not know

ABMC is currently under a NARA issued corrective plan of action for those tasks that are required of it in order to develop and maintain an effective records management program. These tasks, as outlined, are providing the guidance required to support the strategic direction of the RM program.

11. Do you have any suggestions for how NARA can better engage with you and your program in your role as SAORM?

- Yes
- No
- Do not know

ABMC is aware that it is behind in development and implementation of its RM program and is actively working to correct these issues. All that is required at this point is time to implement such improvements.