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.

The reporting period begins on March 11, 2019 with reports due back to NARA no later than April 19, 2019.

NARA plans to post your 2018 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 progress through December 31, 2018.
- 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 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: Abioye Ella Mosheim
- Position title: Assistant General Counsel for FOIA, Privacy and Records
- Address: 4330 East West Highway, Bethesda MD 20814

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: U.S. Consumer Product Safety Commission

2. Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)

   X Yes
   ☐ No

Please explain your response: The Chairman of the Commission has made digitizing records a priority - not just permanent records but all records. Towards that goal, we have been reviewing the current state of records in each program office to determine whether records currently designated permanent still require that designation, how those records are created and stored, as well as what other unscheduled records exist that should be designated permanent. We now have records liaisons (1-4) located in each program office to facilitate the process of identifying permanent records and ensuring that they are maintained electronically by December 31, 2019. The SAORM meets on a monthly basis with the Chief Information Officer (CIO) to discuss the goal of digitizing all records by the 2019 and 2022 deadlines. The CIO is in the process of acquiring electronic records management software to manage electronic records according to established records schedules.

3. Has your agency implemented a plan that aligns to the criteria and requirements published by NARA in its Criteria for Successfully Managing Permanent Electronic Records (March 2018)?

   X Yes
   ☐ No

Please explain your response: A project plan for, inter alia, managing permanent electronic records was approved in May 2018 and is currently in place.

4. As included in the Administration’s Delivering Government Solutions in the 21st Century: Reform Plan and Reorganization Recommendations (June 2018), NARA will no longer accept paper records after December 31, 2022. Is your agency developing
strategic plans, goals, objectives, and initiatives that will enable it to comply with this deadline?

*The Reform Plan states:*

**Transition to Electronic Environment:** Transition Federal agencies’ business processes and recordkeeping to a fully electronic environment, and end the National Archives and Records Administration’s acceptance of paper records by December 31, 2022. This would improve agencies’ efficiency, effectiveness, and responsiveness to citizens by converting paper-based processes to electronic workflows, expanding online services, and enhancing management of Government records, data, and information.

X Yes
☐ No

Please explain your response (include specific goals and example metrics):

Most program offices currently maintain 80% of their records in electronic format. For the program offices that do not, and for the remaining 20% paper based records in the program offices that do, we are all currently in the process of digitizing how they create, receive and store records with assistance from our Office of Information Technology (EXIT). Our agency has a digitization plan in place: EXIT will select an electronic records management (ERM) system. Based on the detailed inventories and analysis conducted during our current state interviews with program offices, EXIT will conduct an ERM pilot program beginning in the summer of 2019. It will also train each program office on how to use the ERM. Based on the results of its summer 2019 ERM pilot program, EXIT will digitize and manage all permanent agency records by December 31, 2019, and all temporary agency records by December 31, 2022. We also have a full time contractor who is digitizing our paper-based records according to NARA’s standards.

5. Is your agency utilizing General Service Administration’s Schedule 36 to procure solutions to assist in transitioning to an Electronic Environment?

X Yes
☐ No

*Please explain your response:* Our agency currently contracts out for records disposal, conversion, and production services, but it is unclear at the time of writing whether these are procured through GSA Schedule 36.

6. Have you, as the SAORM, established or improved your agency procedures that ensure all incoming and outgoing senior officials receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements?

*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
☐ Changes were unnecessary (click here for your agency’s 2017 report)
☐ No, changes are being considered but have not been made
☐ No

Please explain your response: I currently brief all incoming senior agency officials regarding their records. The agency utilizes a records exit form for all exiting employees, including senior agency officials. And once a senior agency official departs, our office works with their records liaison to sort through and properly store records of the departing official.

7. Have you, as the SAORM, ensured that your records management program has the support and resources it needs to be successful? (See NARA Bulletin 2017-02: Guidance on Senior Agency Officials for Records Management)

☐ Yes
☐ No

Please explain your response: The Chairman of the Commission fully supports records management and has made it an agency priority, thus affecting the culture from the top down. The General Counsel and I work closely together to ensure that my department is properly staffed.

8. Have you, as the SAORM, implemented an appropriate role-based records management training program that covers recordkeeping responsibilities for all staff including those with dedicated records management roles, Federal employees, contractors, senior executives and appointees? (See NARA Bulletin 2017-01: Agency Records Management Training Requirements)

☐ Yes
☐ No

Please explain your response: We already had in place annual mandatory records management training for all staff. In 2018, we instituted annual mandatory records management training geared specifically towards records liaisons. Records liaisons also receive periodic training on other aspects of their roles. See also the answer to question 6 regarding training for senior agency officials.

9. Have you, as the SAORM, taken steps to direct and support Records Management staff in implementing an evaluation or auditing process to ensure records
management directives, policies, procedures, and retention schedules are being properly implemented?

X Yes
☐ No

*Please explain your response:* We are still in the process of evaluating the current state of our records, drafting file plans, determining which records require scheduling and which schedules may need revision, and updating our records directive. Once we finish conducting our current state reviews, we will draft an audit to ensure annual review of our directives, policies, procedures, and retention schedules.

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

X Yes
☐ No

*Please explain your response:* We have and will continue to consult with NARA regarding the transition to fully electronic recordkeeping.