



Senior Agency Official for Records Management 2020 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 19, 2021, and reports are due back to NARA no later than March 19, 2021.

NARA plans to post your 2020 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 both records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2022, and other aspects of agency records management programs.
- 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 2020 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
- Address: 4340 East West Highway, Bethesda MD

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

U.S. Consumer Product Safety Commission

2. Has the COVID-19 pandemic changed any policies or practices related to records management at your agency?

- Yes
 No
 Do not know

We were in the processing of reviewing our permanent physical records and preparing them for digitization; these records are located at our headquarters and since March 2020 have not been accessible due to COVID. The resources used to deal with the impact of COVID on the agency also delayed implementation of the electronic records management system.

3. Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)

- Yes
 No
 Do not know

Please provide details on what support is needed: The CIO runs several internal working groups that bring together records, data, and other agency personnel to discuss and resolve issues related to agency information governance. The CIO, SAORM, and ARO also meet on a monthly basis to discuss and resolve these issues.

4. 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
 Do not know

Please explain your response (include specific goals and example metrics): We currently maintain all newly created permanent records in electronic format. We are in the process of transferring all analog permanent records (approximately 20 boxes) from agency headquarters

to NARA's Federal Records Center with a goal of completing those transfers within six months of returning from extended telework due to the pandemic.

5. Has your agency made progress towards managing all temporary records in an electronic format by December 31, 2022? (M-19-21, 1.3)

- Yes
- No
- Do not know

Please explain your response (include specific goals and example metrics): We currently maintain all newly created temporary records in electronic format. We are in the process of transferring all analog temporary records (approximately 80 boxes) from agency headquarters to NARA's Federal Records Center with a goal of completing those transfers within six months of returning from extended telework due to the pandemic.

6. Is your agency investing resources in IT to support the transition to electronic recordkeeping?

- Yes
- No
- Do not know

Please explain your response. If Yes: Please include specific examples of resources and how this will support records management processes: The agency recently purchased O365 to manage all agency records electronically. Our plan is to save all records in SharePoint and apply retention labels to each category of records so that when the retention period expires, we will destroy the records (unless there is a business need to retain them past disposition), or when it is time to transfer legal title to NARA we will transfer the records.

7. To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)

- Yes
- No
- Do not know

Please explain your response (include specific goals and example metrics): We currently do not create any records in analog format that would require ongoing transfer to an offsite storage facility. We do have approximately 100 boxes of analog temporary and permanent records at our headquarters. Before the pandemic we were preparing all remaining analog records for transfer to a NARA Federal Records Center with a target completion date of December 2020. As soon as we return to headquarters we should be able to complete these transfers within six months.

8. Does your agency have policies and procedures that include documentation to ensure records of newly appointed and 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
 Do not know

Please explain your response (include specific details of policies and procedures): The SAORM and/or ARO meet with all incoming and outgoing senior officials regarding their obligations under the Federal Records Act. The SAORM and ARO ensure on both ends of their employment that records are properly captured and maintained, and are available to them throughout their employment to discuss their individual records needs.

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

- Yes
 No
 Do not know

Please explain your response (include details of specific challenges, if applicable): All newly created records since 2020 are fully electronic and we are in the process of implementing our electronic records management system, but implementation has been delayed by the ongoing COVID-19 pandemic.

10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?

- Yes
 No
 Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions): OGIS and DOJ hold semiannual Chief FOIA Officers Council meetings to discuss issues relevant to the management of federal FOIA offices; NARA should create a similar council for SAORMs.