



Senior Agency Official for Records Management 2021 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. 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 records keeping and preservation under both these requirements, as well as other important records management initiatives.

The reporting period begins on January 10, 2022, and reports are due back to NARA no later than March 11, 2022.

NARA plans to post your 2021 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, 2021, 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 2021 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: André V. Mendes
Position title: Department Chief Information Officer
Address: U.S. Department of Commerce
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Washington, DC 20230

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 also indicate any that are new or have been changed due to reorganization or other circumstances.

This report covers all Department of Commerce Bureaus, except for the US Patent and Trademark Office, who will report separately.

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

- Yes
 No
 Do not know

Please explain your response (include details of specific challenges, if applicable):

COVID-19 has interrupted and delayed some important records management projects, particularly those that require physical access to records, as NARA FRCs were not accepting records for most of the period.

3. Does your agency have an established information governance framework that integrates records management, data management, and other agency information lines of business? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff, Security, Privacy Officers, and FOIA)

- Yes
 No
 Do not know

Please provide details. If 'Yes,' provide details on how your RM program is integrated into this framework. If 'No' or 'Do not know,' please explain your response.

DOC and its information governance framework stakeholders have worked to establish a Data Governance Council which connect records management, data management and other agency information lines of business. To increase engagement, we are looking to transfer the DOC Paperwork Reduction Act program and the Records Management Program Office to the Office of the Chief Data Officer.

4. Will your agency meet the goal to manage and preserve 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, example metrics, and/or challenges):

No, partially. All permanent records in an electronic format are being managed electronically, however, DOC Components are still working toward applying appropriate metadata to facilitate transfer or destruction of records. DOC Headquarters and Bureau are still actively seeking the infrastructure and will leverage the Microsoft Office 365 suite, and other electronic records management tools to meet this mandate.

5. Will your agency meet the goal to manage and preserve 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, example metrics, and/or challenges):

No, partially. All temporary records in an electronic format are being managed electronically, however, DOC Components are still working toward applying appropriate metadata to facilitate transfer or destruction of records. DOC Headquarters and Bureau are still actively seeking the infrastructure and will leverage the Microsoft Office 365 suite, and other electronic records management tools to meet this mandate.

6. Does your agency have plans to submit to NARA a request for an exception to the M-19-21 requirements before December 31, 2022?

- Yes
- No
- Do not know

Please explain your response. If 'Yes,' please include an estimate of when you plan to submit an exception and any relevant details. If 'No' or 'Do not know,' please explain your response.

Department of Commerce plans on submitting an exception to M-19-21 requirements in FY 2022.

7. **Is your agency utilizing the General Services Administration's Special Item Number for Electronic Records Management ([518210 ERM](#)) 6 to procure solutions to assist in transitioning to an Electronic Environment?**

- Yes
 No
 Do not know

Please explain your response. If 'Yes,' please include specific examples and how this will support records management processes. If 'No' or 'Do not know,' please explain.

We were not aware that GSA is hosting the "Electronic Records Management (ERM) Working Group". We will promptly engage with GSA and obtain information so DOC can assess requirements and seek to participate in the ERM acquisition roadmap which is hosted by the working group.

8. **Has your agency developed plans to meet the requirements of M-19-21, 1.3 to store temporary records in commercial storage facilities by December 31, 2022?***

- Yes
 No
 Do not know

**M-19-21, 1.3 includes closing of agency-operated storage facilities and no new transfers of paper records to the Federal Records Centers.*

Please explain your response. If 'Yes,' provide details about the use of commercial storage and other changes related to storage. If 'No' or 'Do not know,' please explain.

DOC plans to evaluate its records storage spaces to achieve compliance with M-19-21, 1.3. The DOC may experience challenges meeting the deadline of December 31, 2022 for identifying, associating, accessing, controlling, segregating, deleting, preserving, and migrating large volumes of unstructured electronic information across disparate systems and functions with adequate controls.

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):

(a) The DOC may experience challenges meeting the deadline of December 31, 2022 for identifying, associating, accessing, controlling, segregating, deleting, preserving, and migrating large volumes of unstructured electronic information across disparate systems and functions with adequate controls.

(b) For example, the DOC may experience challenges managing millions of electronic files, controlling and decontrolling sensitive information, culling and protecting personal information, while maintaining business context for staff across email systems, archival collaboration tools, externally hosted cloud-based storage or systems and internal information systems.

(c) The DOC plans to address these challenges by re-training staff, acquiring and deploying smart tools and systems, establishing new policies, procedures, processes, and business rules utilizing an iterative and phased approach with careful planning, extensive piloting and adjustments.

10. NARA is always working on ways we can make your role as the SAORM easier, improve how we interact with you and how you interact with each other. Do you have any suggestions?

- Yes
- No
- Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):

DOC appreciates NARA's continued efforts in establishing short and long-term plans regarding NARA's capabilities and readiness to support and accept system to system electronic file transfers and the capacity to accept and store textual (paper) records at the FRC's. Additional guidance would be helpful regarding compliance with electronic and voice messaging, collaboration tools, managing web content as a record, and social media.

The DOC also suggests NARA provide additional how-to-guidance and tool kits with dedicated websites for managing electronic records in cloud environments, Office 365, social media, transferring permanent electronic records, and transitioning paper records from Federal Records Centers to commercial storage centers.