



## *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](mailto: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: Bruce M. Downs
- Position title: Principle Deputy Chief Information Officer
- Address: 1849 C Street NW, Washington DC 20240

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

The Department of the Interior (DOI, Department) Senior Agency Official (SAO) represents the component bureaus and offices in the table below (identified by Bureau/Office name and NARA Record Group).

<b>Departmental Component Office</b>	<b>Record Group</b>
Department of the Interior	RG048
Office of the Secretary	RG048
Indian Arts and Crafts Board	RG435
Bureau of Indian Affairs	RG075
Bureau of Trust Funds Administration (formerly OST)	RG075
Bureau of Land Management	RG049
Bureau of Ocean Energy Management	RG473
Bureau of Safety and Environmental Enforcement	RG589
Bureau of Reclamation	RG115
National Park Service	RG079
U. S. Fish and Wildlife Service	RG022
Office of Surface Mining, Regulation and Enforcement	RG471
United States Geological Survey	RG057

No other DOI Bureaus reporting separately.

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

- Yes  
 No  
 Do not know

The Department of the Interior released a Digital Signature Directive on March 30, 2020 which established the Department's standards and guidelines for signing electronic documents with digital signatures. This directive embraces the full utilization of the PIV card digital signature capability for all internal documents as well as with external documents whenever possible.

Extensive telework has required adaptation of practices that have moved DOI toward full electronic records management but there is still considerable work to do. There have also been some negative impacts such as: slowing down our digitization of physical records; limiting or slowing progress on records management systems contracts and projects; and responding to FOIA and other sorts of reference requests that required access to our physical records at the Federal Records Centers (FRC). Overall, the constraints were significantly mitigated because our past investments in records management automation allowed us to operate many functions remotely.

**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

Both the SAORM and the CDO are direct reports to the CIO within the Departmental of the Interior. In addition, the Departmental Records Officer (DRO) reports directly to the SAORM. The CIO, CDO, and SAORM are all members of the Information Management Technology Leadership Team (IMTLT), which also includes all Associate Chief Information Officers (ACIOs) from the various DOI bureaus. All significant decisions regarding the DOI Records Management Program are vetted through the IMTLT to ensure alignment with the various DOI lines of business. The CDO chairs the Department's Data Governance Board and shares all Data Management related policies through the IMTLT for increased coordination and awareness as well.

In addition, our DRO leads a working group comprised of all AROs that works on policy development and records management program implementation. This working group ensures consistent implementation of Records Management Program objectives across DOI, as well as providing a forum for sharing records management best practices across the bureaus.

**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

The DOI implemented the eMail Enterprise Records and Document Management System (eERDMS) in support of OMB M-19-21 Goal 1.2. eERDMS is a DOI-wide cloud-based records management system that supports the departmental electronic records program. Part of the transition process to eERDMS includes the identification of appropriate metadata for records as they are transitioned into the platform. As an example of the progress towards Goal 1.2, the Office of the Secretary has established records collections for High Level Officials, which

includes calendars, briefing books, and travel binders. This effort was initiated in the Immediate Office of the Secretary and is being expanded to all Assistant Secretaries in 2021.

In addition, DOI has adopted a modified capstone approach to manage email records. DOI identified High-Level Officials whose records are primarily permanent. Additionally, we are developing an artificial intelligence model to classify the remaining records within our Departmental Records Schedule. DOI is currently on track to transfer the first permanent email records to NARA in 2021.

The DOI has also transitioned to Microsoft Office 365 (O365) during FY 2020. As part of this transition DOI is making the capture of appropriate metadata a key component of the O365 implementation to ensure records are retained appropriately. The intent is to manage the records in place over time rather than replicating into a separate archive.

**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

The DOI is migrating temporary records to electronic format in parallel with permanent records as described in previous question. Each DOI bureau has their own records management program that accommodates unique bureau needs and links to the departmental program and associated strategic plan. The Office of the Secretary, Bureau of Trust Funds Administration (BTFA), the Bureau of Safety and Environmental Enforcement (BSEE), Bureau of Reclamation (USBR), and Bureau of Land Management (BLM) have added resources to enable the move to electronic records. The USBR is managing a majority of their records electronically using eERDMS. BTFA has also initiated a large-scale digitization effort in the American Indian Records Repository.

DOI is currently developing updated performance metrics that will measure the Department's overall migration to electronic records.

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

Yes

No

Do not know

The DOI was an early adopter of records management technology with the original implementation of the eERDMS solution in 2013. In 2020 the Department extended its commitment to eERDMS by awarding a new contract to continue the support of the solution. In addition, the Department awarded a new Email and Collaboration contract in 2019 and has since

implemented O365 throughout the Department. In support of the implementation of O365, the Department has also hired a full-time Electronic Records Program Manager who is leading the effort to configure O365 in support of the Department's Records Management Program. The DOI is migrating records management capabilities to O365 whenever possible.

**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

The DOI has established a contract with a NARA approved commercial storage facility. All DOI bureaus can leverage this contract for their individual needs. It is important to note however, that DOI has a very limited number of agency-operated records storage facilities.

**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

The DOI has a cross-functional team from Human Resources, the Office of the Chief Information Officer, the Solicitor's Office, and the White House Liaison which meets regularly and track the onboarding and offboarding of political appointees and High-Level Officials. The DOI also requires all new employees to complete a computer-based training that include records management fundamentals prior to their first day with the Department. In addition, all new political appointees also attend an in-person training with records officers on their records management responsibilities. This in-person training serves not only to reinforce the records management responsibilities but also provides the political appointees with an opportunity to ask questions and get clarifications on records management specifics that may impact their position.

All departing political appointees and High-Level Officials likewise go through a records management briefing to ensure their Federal Records are preserved and transferred as

appropriate. This process requires the departing employee to confirm in writing that all Federal Records have been retained by the Department. This process also collects hardware and captures relevant files from their Government Furnished Equipment.

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

- Yes
- No
- Do not know

While the DOI is making good progress in the transition to electronic records, the primary challenge we face is overcoming the resource and budget limitations that will hinder the accomplishment of the 2022 goal. The DOI spent much of 2020 migrating from its former Email and Collaboration suite to Office 365, While the DOI has spent considerable time and resource working to leverage the records management functionality of O365, there are meaningful functionality gaps within the O365 suite in terms of records accessioning and dispositioning that still need to be resolved. The Department also awarded a new eERDMS contract which will allow continued migration to electronic records while O365 configuration changes are made, but at some point the records in eERDMS will also need to be migrated to O365.

In addition, the technical requirements being defined for permanent digitized records may require significant rework for documents that have already been digitized. We are also concerned that some proposed standards may not be achievable using equipment and software that is currently commercially available. DOI has already been working to meet the full electronic recordkeeping goal; we started this digitization process prior to NARA finalizing the CFR, because it ismcritical to DOI making progress towards the 2022 deadline.

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

- Yes
- No
- Do not know

It seems that the SAORM calls have been more sporadic over the past year, maybe due to the pandemic. We would like to see these discussions on a more regular basis and possibly work with specific SAORMs to identify particular strengths they possess would help other agencies with, or possible areas they could use assistance with to foster collaboration across the Federal Government.