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 8, 2024, and reports are due back to NARA no later than March 8, 2024.

NARA plans to post your 2023 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 rmselfassessment@nara.gov. Include the words "SAORM 2023 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: Kenneth Klinner

- Position title: Deputy Chief Information Officer - Program Management

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

Departmental Component Office	Record Group
Department of the Interior	RG048
Office of the Secretary	RG048
Indian Arts and Crafts Board	RG435
Bureau of Indian Affairs	RG075
Bureau of Indian Education	RG075
Bureau of Trust Funds Administration	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

2. **Will your agency 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
>
> Not applicable, all records are in electronic format

The Department's progress towards OMB M-23-07 Goals 1.1 and 1.2 was significantly impeded during the pandemic. The operating conditions during the pandemic also slowed down the archiving and digitization of physical records because physical access to workspaces, equipment, and analog records was not possible. While the extension of the deadline to June 2024 for the migration to electronic records has helped mitigate the circumstances to a degree, this extension was insufficient for the Department of the Interior (Department, DOI, Interior) to complete a full migration.

The Department implemented the eMail Enterprise Records and Document Management System (eERDMS) and Microsoft Office 365 (M365) as cloud-based tools to support electronic records management. All bureaus have access to eERDMS and M365 and are using those capabilities to migrate to electronic records. While eERDMS has been in use at Interior for several years, the Departmental Records Management Program is having to establish new standard operating procedures for the use of M365 to support consistent records management practices across the Department.

The Departmental Records Management Program has also established electronic records assessment metrics which have been compiled by all bureaus. These metrics enable bureaus to measure their migration to electronic records and complete budgetary estimates for digitization efforts for both permanent and temporary records. The Department implemented a "Scanning Feasibility Application" that is leveraged by bureaus to quickly assess the scope, priority and cost of records digitization projects based on current contract terms. Through the use of these metrics and tools, DOI has determined that full migration by June 2024 will not be possible. The Departmental Records Management Program is working with Responsible Records Officers across Interior to document a Department-wide exception request that will be submitted to NARA prior to the end of June this year.

3. **Will your agency meet the goal to manage and preserve all <u>temporary</u> records in an electronic format by June 30, 2024? (M-19-21, 1.3 and M-23-07, 1.3)**

> Yes
>
> No
>
> Not applicable, all records are in electronic format

The Department transitioned email and document collaboration services to M365 during Fiscal Year (FY) 2020. The Department continues to explore opportunities to implement emerging M365 capabilities to improve records management, including the capture of

appropriate metadata. The Department has established an integrated team to work through the configuration and testing of M365 to support the management of all electronic records going forward. While the basic records management capabilities exist within M365, the solution is limited in the amount of flexibility and autonomy provided to individual bureaus so Interior is having to work through extensive testing and developing process workarounds to fully leverage the capabilities of M365. The Department will implement in-place archiving for many temporary records in M365 SharePoint and possibly OneDrive in FY 2024. The Department will also begin managing email in place with M365 Exchange and will discontinue journaling email to eERDMS in FY 2024.

The Departmental Records Management Program is updating the "Electronic Records Management" policy, which codified Interior's commitment to move to electronic records by ensuring that electronic records are maintained in appropriate systems with the proper records management controls, that digitization standards meet Code of Federal Regulations (CFR) requirements, and that Responsible Records Officers (RROs) have the ability to officially lift "print and file" requirements once the appropriate electronic recordkeeping requirements are met.

4. **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 by June 30, 2024? (Choose all that apply)**

> Yes
>
> No
>
> Not applicable, my agency does not have agency-operated records storage facilities
>
> Not applicable, all records are in electronic format

The Bureau of Trust Funds Administration (BTFA) operates the American Indian Records Repository (AIRR) in Lenexa, KS. This agency-operated records center currently stores approximately 300,000 cubic feet of Indian Trust and other Tribal related records. The Department intends to continue to operate this records center for the foreseeable future to meet ongoing Indian Trust responsibilities. BTFA has invested significantly in high-speed and high-quality scanning technology and processes in order to digitize records currently stored at AIRR. Due to the volume of records at AIRR, this process is expected to extend well beyond the 2024 deadline established in M-23-07. One of the exceptions to the June 2024 deadline will request NARA to accept permanent records from the AIRR that are mutually agreed to by DOI and NARA after the 2024 deadline.

5. **Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 and transfer inactive records to a NARA Federal Records Center (FRC) or commercial storage facilities by June 30, 2024? (Choose all that apply)**

> Yes, we will transfer to the FRC
>
> Yes, we will transfer to commercial storage facilities

No

Not applicable, all records are in electronic format

As noted in the response to questions 2 and 3, it is clear the Department will not fully make the revised M-23-07 timeline of June 2024. While the bureaus are focused on transferring as many analog records as possible to the FRC prior to the June 2024 deadline, this effort will certainly not be fully complete. Clearly not all of remaining records will be digitized, even a fraction of which will cost the Department tens of millions of dollars that is not currently in the budget. For these reasons the Department will need an exception to the June 2024 deadline established in M-23-07.

The Department does have contracting vehicles in place that support moving records to appropriate commercial storage facilities. These vehicles will continue to be used to the extent that NARA does not approve exceptions for specific groups of records.

Finally, the extended time it has taken to get Departmental Records Schedules approved by NARA has also impacted DOI's ability to get records transferred to NARA in a timely manner.

6. **Does your agency have a Data Management Strategy that includes records management principles? (***https://www.archives.gov/files/records-mgmt/resources/cdo-rm-assessment-report.pdf***)**

Yes

No

Both the SAORM and the Chief Data Officer (CDO) report directly to the Department Chief Information Officer (CIO). Additionally, the Departmental Records Officer (DRO) reports directly to the SAORM. The CIO, CDO, and SAORM are all members of the Information Management and Technology Leadership Team (IMTLT), which also includes all Associate Chief Information Officers (ACIOs) from the various Interior bureaus and offices. All significant decisions regarding the Interior Records Management and Data Management Programs are vetted through the IMTLT to ensure alignment with one another.

In 2023, the Office of the Chief Information Officer (OCIO)released the DOI Information Management and Technology Strategic Plan. GOAL 5 of the IMT Strategic Plan is: "DOI Data Answers Tomorrow's Questions Today" and will create a data-centric ecosystem that allows the DOI workforce, people, community, organizations, and the public appropriate access to data on our land, water, cultural, and natural resources. Because DOI missions often cross multiple bureaus, the data used to inform those programmatic decisions will become more secure, interoperable, and reusable through efforts to implement data standards and master data. Focused efforts to improve the customer experience of our data platforms will streamline data usage in products like maps and data visualizations. Goal 5 and its implementation strategy are in direct alignment with the Records Management Program's Departmental Records Schedule (DRS) project which is consolidating similar records schedules across DOI's thirteen bureaus into a

reduced number of standardized disposition authorities which will make the records consistently and easily retrievable regardless of the bureau that sourced the records.

7. **In your role as SAORM, do you meet with your Agency Records Officer(s) to discuss the agency records management program's goals?**

> Yes
>
> No
>
> Not applicable, my agency does not currently have a designated Agency Records Officer

The Departmental Records Management Program conducts monthly meetings with the Responsible Records Officer from all Interior bureaus and major offices. The SAORM regularly participates in these meetings on at least a quarterly basis to stay in tune with individual bureau records management programs. Once each year these meetings are extended to multiple days to provide each bureau an opportunity to raise risks and issues directly with the SAORM. In addition, the SAORM accepts escalations from the Departmental Records Officer when specific bureaus are having resource, budget, or other issues. The SAORM then works with the Associate Chief Information Officer or other bureau management to make sure the issue has appropriate visibility and is being addressed.

Recent tropics covered in the meetings with the SAORM include:
- Possible discontinuing of email journaling from M365 to eERDMS - reviewed risks and potential cost savings for feedback and future reviews with the IMTLT before the approach is approved
- IMT Strategic Plan and how Records Management is a building block for many of the strategic plan components like Data Management, Data Governance, Zero Trust and Cybersecurity
- Bureau needs for and possible technical options to provide digital signatures from parties outside of DOI and the Federal Government
- Transition from the previous to the current SAORM

8. **Has your agency incorporated NARA's digitization standards into your Information Resource Management (IRM) Strategic Plan? (44 U.S.C. 3506(b)(2) and OMB Circular A-130)**

> Yes
>
> No
>
> Not applicable, my agency is not currently digitizing records

The OCIO released an updated [Information Management and Technology Strategic Plan (IMTSP)](#) in December of 2023. The IMTSP includes the following goal: Optimize our IMT Operations to be Resilient, Sustainable, Innovative and Adaptable. One of the planned outcomes for this goal is "to provide better digital delivery and access to services

to the American public". The implementation strategy for this goal is to develop a Performance Management Framework (PMF) that aligns with OMB's Federal Information Technology Operating Plan, released in June 2022, other Federal IMT guidance, and Federal Information Technology Acquisition Reform Act (FITARA) including Circulars A-11 and A130. The PMF includes records management specific measures including the development of an Enterprise Roadmap that implements priority programs and initiatives to accelerate digital transformation and improve services to the Citizens through mission delivery.

Additional measures are incorporated into the PMF that include the migration to electronic records and compliance with internal policies including DOI's RMP-2021-02: Electronic Records Management policy. This policy already includes NARA's temporary records digitization standards and is currently being updated to include the permanent records digitization standards as well.

9. **Does your agency have a social media strategy that includes capturing and maintaining records in accordance with records management statutes and regulations?**

> Yes
>
> No

DOI recently recompeted its social media management platform. Part of this recompete included a social media archiving solution that captures both social media posts as well as comments and reactions to those posts. The Department Records Management program is currently working to incorporate the social media archives into our eERDMS recordkeeping system. DOI already has scheduled social media records in our approved Departmental Records Schedules and will be maintaining our social media archive according to those schedules.

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

> Yes
>
> No

It would be extremely beneficial if NARA would investigate appropriate resourcing levels with the Appraisal Archivist function within NARA. Interior has been working on our Departmental Records Schedule for several years. Feedback on public comments for one schedule has been completed for over two year and the Consolidated Reply memorandum has still not been issued. For agencies to be successful at the transition to electronic records it is essential the newer schedules get approved in a timely manner.

Additionally, the notification of "Rescinding FAQs About Changes to Previously Approved Schedule Items" on January 4, 2023, has created concerns across the Interior records management community. One of the main concerns is in updating crosswalks with "big bucket" schedules which previously had been handled as a pen and ink change.

The same concerns exist for just updating or clarifying language that does not impact the intent or scope of the schedule. It would be helpful if NARA could provide guidance on how such changes can be made going forward without changing the specific disposition authorities, which will significantly impact training and ongoing records management operations within Interior bureaus and offices.