



## Senior Agency Official for Records Management 2018 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.

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 [rmsselfassessment@nara.gov](mailto:rmsselfassessment@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: Milton Al Stewart
- Position title: Deputy Assistant Secretary for Operations
- Address: U.S. Department of Labor, 200 Constitution Avenue, NW, Washington, DC 20210

- 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:

The Department of Labor (DOL)

1. Adjudicatory Boards (ARB, BRB, ECAB)
2. Administrative Law Judges (OALJ)
3. Assistant Secretary for Policy (ASP)
4. Bureau of International Labor Affairs (ILAB)
5. Bureau of Labor Statistics (BLS)
6. Employee Benefits Security Administration (EBSA)
7. Employment and Training Administration (ETA)
8. Office of the Executive Secretariat (EXEC SEC)
9. Mine Safety and Health Administration (MSHA)
10. Office of the Assistant Secretary for Administration and Management (OASAM)
11. Office of the Chief Financial Officer (OCFO)
12. Office of Congressional and Intergovernmental Affairs (OCIA)
13. Office of Disability Employment Policy (ODEP)
14. Office of Federal Contract Compliance Programs (OFCCP)
15. Office of Inspector General (OIG)
16. Office of Labor-Management Standards (OLMS)
17. Office of Public Affairs (OPA)
18. Occupational Safety and Health Administration (OSHA)
19. Office of the Solicitor (SOL)
20. Office of Workers' Compensation Programs (OWCP)
21. Veterans' Employment and Training Service (VETS)
22. Women's Bureau (WB)
23. Wage and Hour Division (WHD)
24. Ombudsman (OMBUD)

**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)**

- Yes  
 No

Please explain your response:

In November 2015, DOL Records Management established SharePoint sites for all its assigned agencies for the maintenance and storage of their records program records, providing guidance and training on the use of the application and its tools.

In August 2016, the Department of Labor (DOL) established a working group with its agency representatives to address the electronic signature directive. The purpose of this policy is to: Establish the Department's policy for using and accepting electronic signatures; and Enable the Department to fulfill its obligations under the Government Paperwork Elimination Act (GPEA), Public Law 1-5-277 (codified at 44 U.S.C. 3504), and implement OMB guidance. While the directive has not been finalized, it is in the final clearance process.

During calendar year 2018, in preparation for the move toward electronic record keeping, the Department invited several companies (on GSA Schedule 36) to demonstrate their capabilities. Furthermore, toward the end of the year, DOL issued a Request for Information (RFI) based upon NARA's existing Universal Electronic Records Management Requirements. There are plans to form an exploratory committee in conjunction with the resurrected Strategic Records Management Plan to update and review Agency requirements and explore Commercial off the Shelf (COTS) products, custom solutions and or leverage existing technology.

**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)?**

- Yes  
 No

Please explain your response:

In 2018, the Department took several important steps to ensure that effective policies and systems are in place in order to meet the requirements of the Office of Management and Budget's Managing Government Directive (M-12-18) by December 31, 2019. This includes forming partnerships with the Chief Information Officer (CIO) for technical

expertise on existing Departmental information systems, coordinating with all relevant stakeholders, including DOL Agency Records Officers (ARO) to conduct an inventory of all of DOL's permanent records to ensure that all records are captured on DOL's file plans, and that all eligible permanent records are accessioned by NARA. In addition, the Department began drafting new policy and training documents that describe these changes to all staff. The Department also took steps to research and submit a cost estimate to leadership for the digitization of existing permanent records. This will ensure the Department's permanent records will contain the proper metadata, are available, accessible, and managed with the ability to execute disposition in electronic format by the December, 31, 2019 deadline.

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.

- Yes  
 No

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

In 2018, the Department developed a 30, 60, 90 day plan in order to prepare for the change to NARA's storage policy.

30 Days:

- Meet with DOL AROs to begin an inventory on all temporary and permanent paper records;
- Draft new policy on the creation of electronic records and use of metadata;
- Identify any program areas that may need to continue to create paper records;
- Evaluate current record holdings both onsite and at the Federal Records Center (FRC); and
- Ensure all records schedules are media neutral.

60 Days:

- Ensure all temporary and permanent records are captured on DOL file plans;

- Work to destroy any eligible temporary paper records;
- Conduct cost estimate on digitization of temporary and permanent records;
- Ensure all eligible permanent records stored at FRC are accessioned by NARA; and
- Circulate draft policy document to relevant stakeholders for comment and feedback.

90 Days:

- Update the Strategic Records Management Plan;
- Update DLMS 1 – Records Management Chapter 400 – Records Management Program to include revised policy on records storage, use of metadata, and naming conventions;
- Discourage the creation of paper records through training and outreach efforts via email campaign to DOL Agencies; and
- Work with the Procurement Office to devise a plan to capture the most cost effective and long term storage solutions; and
- Provide cost estimate to leadership.

In addition to the 30, 60, 90 day plan, the Department established additional goals and recommendations for meeting the requirements of the storage policy change. These include updating the annual training module and the DLMS 1 – Records Management Chapter 400 – Records Management Program to include new policies on permanent and temporary records and increasing outreach and communication to Agencies to ensure compliance with new policies.

**5. Is your agency utilizing [General Service Administration's Schedule 36](#) to procure solutions to assist in transitioning to an Electronic Environment?**

- Yes  
 No

Please explain your response:

Describe the plan going forward (RFQ for service)

During calendar year 2018, in preparation for the move toward electronic record keeping, the Department invited several companies (on GSA Schedule 36) to demonstrate their capabilities. The Department will continue to utilize the GSA Schedule 36 throughout the acquisition process.

**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:

DOL has currently updated its current records directive, DLMS 1 – Records Management Chapter 400 – Records Management Program Date: May 2017 to include additional guidance and practices already in use within the Department. The clearance of the new directive was completed September 30, 2018.

#### “422 Personnel Arrival Training Requirements

All new employees including contractors and interns, must complete the Departmental Records Management for everyone course within 60 days of arrival. Additionally, agencies will provide guidance on where records should be maintained to include storage, access, and application of disposition instructions of assigned records.

DRO or ARO's must provide targeted records management training to political appointees, senior agency officials, and senior executives upon their arrival. This may include conducting entry interviews with your agency's records management staff, IT liaisons, and general counsel to ensure that records are preserved and protected.”

#### “423 Personnel Departure Training

All departing employees including contractors and interns will be briefed by their ARO or RL on agency records management departure procedures. At a minimum, agencies should provide departure procedures 90 days in advance, or as soon as the individual notifies the agency of their departure, to allow records preparation and transfer prior to the employee's departure date. All DOL employees must request and obtain approval from their ARO for removal of copies of materials or information they may desire to take. To the extent questions remain after discussions with the ARO, the employee should work with the ARO to identify the appropriate agency FOIA representative. In the event that any questions involve by review, the employee should work with the ARO and the agency FOIA representative to identify and coordinate with the appropriate SOL office to assist with the review. For senior officials including Agency Heads, Career and non-career Senior Executive Service (SES) employees, Schedule C employees, and Presidential Appointees with or without Senate Confirmation (PAS/PA) please refer to

the DOL Policy on Guidelines Governing Disposition of Federal Records when Leaving the Department of Labor found on LaborNet.

DRO or ARO's must provide targeted (i.e. agency specific) records management training to political appointees, senior agency officials, and senior executives upon their departure, and/or within three to six months prior to a presidential administration change; whichever comes first. This may include conducting exit interviews with your agency's records management staff, IT liaisons, and general counsel to ensure that records are preserved and protected."

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 DOL directive Department of Labor Manual Series (DLMS) 1 – RECORDS MANAGEMENT Chapter 400 – Records Management Program Date: May 2017, currently includes the language mandating agencies to appointing their SAO “to oversee and assist the Departmental SAO in obtaining feedback on actions required. The SAO also coordinates with the Departmental Records Officer (DRO) to incorporate NARA records management goals and tasks within DOL's plans and strategies.”

In the September 2017 NARA Inspection Report it was mentioned “The DRO receives strong support from the DOL SAORM and has excellent lines of communication with agencies and offices throughout DOL. There is also a close organizational relationship between the DRO and the Office of the Chief Information Officer (OCIO), which can be leveraged to meet the electronic records requirements of the Office of Management and Budget (OMB) and NARA Directive M-12-18.2.”

Reference: <https://www.archives.gov/files/records-mgmt/DOL%20Records%20Management%20Inspection%20Report.pdf>

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:

At this time, the Department of Labor does not have the resources to create role based training modules. We do however, ensure there is a Department-wide annual training for all employees tailored to new records management policies.

**Explain difference between Agency level and Departmental Level training**

The agencies are responsible for agency-specific training tailored to their records schedules, inventories, and subject matter. However, the mandatory Department-wide training is based upon the latest NARA guidance in conjunction with DLMS 1 – Records Management Chapter 400 – Records Management Program.

**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?**

Yes

No

Please explain your response:

As the SAORM for DOL, it is important that I offer support and leadership for the Departmental Records Program. The Department’s DLMS 1-400 serves as the Records Management directive and is updated as required when new policy or procedures are implemented. Each Agency is required to update their records retention schedule, file plan and inventory as needed.

Each year, agencies are required to submit a memorandum with the submission of their Records Management Self-Assessment (RMSA), which attests to any deficiencies within their programs. Subsequently the agencies are required to certify that any deficiencies will be addressed in the following year. Additionally, the Department will implement a new internal evaluation tool in June 2019. This new procedure has my full support. Once the internal evaluation is completed, the Departmental Records Officer will submit a report on the strengths and vulnerabilities of the program at which point, I will ensure that these deficiencies are addressed and corrected.

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

Yes

No

Please explain your response:

NARA’s support will be critical as the Department seeks to transition into a fully electronic recordkeeping platform. While the Department employees the subject matter expertise to develop the necessary requirements, it will be especially helpful for NARA



to provide examples of successful enterprise-wide electronic recordkeeping systems at other agencies, offer shared services options (if available), and offer examples of other Departments or component agencies developing and implementing user-driven content management systems.