



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: 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?

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)

2. Has the COVID-19 pandemic changed any 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):

The Department has taken into consideration that the COVID-19 pandemic changed practices

related to storage of records at Federal Records Centers (FRC). Throughout the year the Departmental Records Officer (DRO) consulted with NARA officials regarding the status of the FRC services for the Department and for DOL agencies. In order to ensure necessary storage of Departmental records, agencies may need to look to services provided at commercial storage facilities. As a result of that process, the Department may establish supplemental policy guidance in order to ensure proper records storage compliance.

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

In the first and second quarter of fiscal year (FY) 2021, the DRO established a series of collaborative meetings to prepare the groundwork for the Department-wide information governance framework with the Chief Information Officer (CIO), Chief Data Officer (CDO), Agency Records Officer (ARO) and Senior Management. The internal goals consisted of establishing the program and mission overlap between records management and data and information management. The CDO is establishing a baseline metadata taxonomy for Department-wide implementation. The CDO and DRO share a vision of the strategic resource value of the Department's records collections and data collections. The CDO's metadata and taxonomy baseline will incorporate the records management metadata requirements for enterprise information management. The records metadata elements are based on NARA's guidance for the transfer of permanent records that references the modified Dublin Core Metadata Element Set v1 standard. The DRO has been instrumental in ensuring that the strategic goals of the Department's records information management program become integrated into the design, development and implementation of all information and data management resources at the Department and the Agencies.

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):

The Office of Asset and Resource Management (OARM) formed a multi-functional committee, which includes the Office of Acquisition Services and the Office of the Chief Information Officer. The working group, which includes representatives from the Office of the Solicitor (SOL), OCIO, the Office of the Inspector General, the Bureau of Labor Statistics, the Wage and Hour Division, and the Assistant Secretary for Administration and

Management; The working group continues to develop the guidelines for managing permanent records with the associated metadata. The Department's agencies are developing their own mission specific metadata requirements.

The Department is also taking into consideration that the metadata requirements may vary depending on the commercially available Electronic Records Management System (ERMS). The Department has given significant consideration to its Department-wide ERMS system and information management framework and plans to establish a metadata minimum baseline for agencies to provide the Department's information management framework. At the same time the Department provides guidance and assistance to the agencies in the development and maturity models for their records management programs, the Department is considering designing the flexibility for the agencies to accept the minimum metadata framework and add additional agency specific metadata for mission purposes. The Department has made progress for the management of permanent electronic records using metadata. Specific goals for metadata management include addressing continuous risk assessments, communication plans and change management processes. Although, in order to promote and ensure that the necessary metadata is attached to all permanent electronic records, the Department will establish supplemental policy guidance in order to ensure compliance by end users.

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):

As previously mentioned, the Department's current policy is to manage permanent electronic records in place while we work to acquire and implement an ERMS. The goals for the management of the Department's permanent records will overlap with the management of its temporary records since the development of the information management framework will be applied first to permanent records and then applied to temporary records in subsequent identification, metadata tagging and data system migration for records lifecycle management. However, the Department's current priority is to establish procedures for managing all electronic records in place, and we will continue to review our temporary electronic records practices. We do anticipate that managing temporary electronic records will require additional internal controls and education for the end users.

In addition, the DRO will revise the mandatory Department-wide records management training to include more training on electronic recordkeeping.

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. If No or Do not know: Please explain.

The Department intends to leverage both financial and staffing resources in the Business Operations Center (BOC), OCIO, the DOL agencies and to utilize contractor resources for ERMS system design, implementation, training and professional services.

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):

After consultation with all agency AROs, we have determined that the Department of Labor does not have any agency-operated records centers.

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):

DOL's current records management procedure manual, DLMS 1 – Records Management Chapter 500 – Records Management Program (Date: May 2017), includes additional guidance and practices which are already in use within the Department.

422 Section of the Personnel Arrival Training Requirements of the records management procedure manual

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.

[The] 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 Section of the Personnel Departure Training Requirements of the records management procedure manual

All departing employees, including contractors and interns, will be briefed by their ARO or Records Liaison 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 supervisor, in consultation with the ARO, when necessary, for removal of copies of materials or information.

To the extent questions involve additional 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.

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) must refer to the DOL Policy on Guidelines Governing Disposition of Federal Records when Leaving the Department of Labor found on the DOL intranet.

The DRO or ARO 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 the agency's records management staff, IT liaisons, and general counsel to ensure that records are preserved and protected.”

Additionally, in 2019, the DRO updated the entrance and exit briefing materials specifically for incoming and outgoing senior officials, political appointees and career senior executive staff.

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

- Yes
- No

Do not know

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

The Department is committed to meeting the goal of a fully electronic recordkeeping environment to the furthest extent possible. However, there will be challenges in meeting this goal, such as, staff opposition to changing processes, roles and responsibilities; concern over the overlap in the OCIO, CDO and RIM programs regarding information and data management; concern with invasive software; continually evolving technology (i.e. text messages, encrypted messaging, Controlled Unclassified Information, and FOIA); and the resistance to moving away from paper-based processes; long-term funding; and staffing (knowledge base).

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):

NARA's guidance on the development of an information governance framework will be necessary for Departmental success.