



## ***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](mailto: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: 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 provide a list, and also indicate any that are new or have been changed due to reorganization or other circumstances.*

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

- Yes
- X No
- Do not know

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

The Department has taking into consideration that the COVID-19 pandemic changed practices related to storage of records at Federal Records Centers (FRC). Throughout the year the DRO consulted with NARA officials regarding the status of the FRC services for the Department and for the Agencies. In order to ensure necessary storage of Departmental and Agency 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 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
- X 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.*

In the third quarter of FY22, the Departmental Records Management Program transitioned from the Business Operations Center to the Office of the Chief Information Officer (OCIO). The Records Management program transition and realignment to the OCIO framework has created a series of ongoing business realignments for the program. The Departmental Records Officer (DRO) has participated in a series of collaborative meetings with the DOL Internal Review Board, The Performance Review Board and the Working Capital Review Board and the Agencies to prepare the groundwork for the Department-wide information governance framework with the OCIO, CDO, ARO and Senior Management. 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. 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):*

In anticipation of meeting the M-19-21 mandate, the Department transitioned the Records Management Program to OCIO. As part of that transition and focus on its goal to manage and preserve all permanent records in electronic format the Records Management Program participated in Discovery Sessions with the Agencies to identify their permanent records, electronic records format, metadata requirements and system locations. The Department has adopted NARA's metadata minimum baseline and promoted, as a hybrid-solution, the inclusion of additional Agency mission-specific metadata categories to provide the Department's information management framework. Specific goals for metadata management include addressing continuous risk assessments, communication plans and change management processes. At the same time the Department has prioritized the Department-wide ERMS system for the management and preservation of permanent electronic records. The Department has issued the first of its Electronic Records Management policy memos and anticipates supplemental policy guidance in order to ensure compliance by December 31, 2022.

**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):*

As previously mentioned, the Department's current policy is to provide a phased-in management of its records starting with managing permanent electronic records in a newly acquired 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 electronic temporary records in place using an enterprise application of applied metadata for both permanent and temporary records.

We do anticipate that managing temporary electronic records will require additional internal controls and education for the end users. As part of the Department's records management initiative the Department anticipates creating an enterprise digitizing initiative for the scanning and application of metadata to its remaining physical records.

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

**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.*

The Department is currently conducting an analysis of its records and business needs to determine if it will submit to NARA a request for an exception to the M-19-21 requirements. The Department intends to meet the M-19-21 to the fullest extent possible, however there may be Agency cases where physical records cannot be replaced or Agency cost estimates to digitize their records will far exceed the benefit.

**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.*

The Department is not using 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. The Departmental Records Officer is an appointed member of the GSA ERM Advisory Council and provides guidance to the Department on all available GSA ERM resources.

**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.*

The Department has not developed plans to store temporary records in commercial storage facilities by December, however Agencies may have plans to contract with commercial storage facilities to meet specific mission and business requirements. The Department intends to continue with a proactive approach to prioritize ERA transfer of permanent records to NARA and ARCIS to provide storage of physical records in Federal Records Centers.

**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):*

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, Privacy and RIM programs regarding information and data management; concern with invasive software; continually evolving technology.

The Department anticipates overall success implementing the enterprise technology framework for the management of electronic records with perhaps some challenges in the realignment of our current DLMS policies to reflect the transition of the Records Management Program to the Office of the Chief Information Officer. There are many aspects of change management and assessing the current state of the intersection of several programs to include Records Management, Privacy, and Controlled Unclassified Information, FOIA and Litigation Hold.

**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):*

A combined meeting with OMB or GSA to include NARA initiatives could provide more efficient communication.