



Senior Agency Official for Records Management 2022 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 (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 9, 2023, and reports are due back to NARA no later than March 10, 2023.

NARA plans to post your 2022 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 rmsselfassessment@nara.gov. Include the words “SAORM 2022 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:** Dennis Johnson
- **Position title:** Acting Deputy Assistant Secretary for Operations
- **Address:** U.S. Department of Labor, 200 Constitution Ave. 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 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)

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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. In response to the COVID-19 pandemic, have any of the temporary adaptations to agency business processes become permanent improvements to the management and preservation of electronic records?

Yes

No

Not applicable, no adaptations were needed

Do not know

Please explain your response. (If Yes, include details of the changes and why they became permanent. If No, or Do not know, please explain your answer.)

The electronic records management improvements that occurred during the pandemic were already part of the Department's plan to meet NARA's M-23-07 (formerly M-19-21) guidelines. The pandemic simply accelerated the Department's shift away from paper recordkeeping by forcing Agencies to alter their business processes on a shorter timeline to accommodate remote work. Now that the majority of new records are born digital, the Records Management Program can manage more of the Department's records sooner using its newly-acquired Electronic Records Management System (ERMS).

3. Has your agency taken action to 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

Do not know

Please explain your response with specific actions taken, challenges and results.

In anticipation of meeting the M-19-21 mandate, the Department transitioned its Records Management Program to OCIO and acquired an Electronic Records Management System (ERMS). This ERMS will eventually facilitate the systematic management of the Department's permanent and temporary electronic records throughout their lifecycles. To prepare for implementation, the Records Management Program participated in discovery sessions with agencies to identify the system locations, formats, and metadata requirements of their permanent electronic records.

Currently, the first phase of ERMS implementation is underway. During this phase, copies of agency permanent records located in SharePoint or OneDrive sites will be ingested into the ERMS for preservation, disposition management, and transfer packaging with appropriate metadata. The Department has adopted NARA's metadata minimum baseline and promoted, as a hybrid solution, the inclusion of additional Agency mission-specific metadata categories.

4. Has your agency taken action to meet the goal to manage and preserve all temporary records in an electronic format by June 30, 2024? (M-19-21, 1.3 and M-23-07, 1.3)

X Yes

No

Do not know

Please explain your response with specific actions taken, challenges and results.

As previously mentioned, the Department's current policy is to use its new ERMS to provide phased-in electronic records management starting with permanent records. However, system configuration and user training taking place during this first phase also sets up the necessary infrastructure to eventually implement the ERMS for temporary electronic records management.

Additionally, the Department is in the process of creating an enterprise digitization initiative for its remaining physical records. The DRO has also revised the mandatory Department-wide records management training to include updated training on electronic recordkeeping.

5. 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 and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities by June 30, 2024?

X Yes

No

Not applicable, all records are in electronic format

Do not know

Please explain your response with specific actions taken, challenges and results.

The Department does not operate any off-site records storage facilities. The Department does not use commercial storage facilities and has no plans to use commercial storage facilities; the Department only uses Federal Records Centers. The Department intends to continue with a proactive approach to prioritize the electronic transfer of permanent records to NARA, and to encourage the transfer of all eligible paper records to the Federal Records Centers prior to June, 2024.

6. Does your agency have policies and procedures that incorporate records management into the information governance (IG) framework for information, data, and other agency information management? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, Records Management (RM) Staff, Security, Privacy Officers, and FOIA)

Note: The incorporation of records management into information governance is part of the framework covered by [OMB Federal Data Strategy - A Framework for Consistency \(M-19-18\)](#) as it provides a vision for managing and using federal data, along with recordkeeping requirements included in [OMB Circular A-130, Managing Information as a Strategic Resource](#).

- Yes
 No
 Do not know

Please explain your response and provide details about how your agency's policies enhance IG and RM's role or relationship to it.

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

7. Has your agency developed policies and procedures to ensure the capture and preservation of electronic messages, including when hardware or software is upgraded?

Note: Electronic messages means electronic mail and other electronic messaging systems that are used for purposes of communicating between individuals. Electronic messages that satisfy the definition of a federal record under the Federal Records Act are

electronic records. This includes email, text messages, chat messages, voicemail, social media posts, and other similar applications. (See: [Email Management](#) and [CFR 1236: Electronic Records Management](#))

X Yes

No

Do not know

Please explain your response and include details of your agency's methods to capture and preserve electronic messaging records or challenges preventing you from doing so.

DLMS 1-500 sections “530: Electronic Records” and “531: Email Records Under Capstone” outline the policies and procedures that the Department has developed to ensure the capture and preservation of electronic messages. The Department adopted the Capstone approach to electronic mail capture and preservation in 2016. The official email account(s) of Capstone permanent officials are retained for 15 years after account deactivation before transfer to NARA. Non-Capstone personnel email is temporary and is retained for 7 years from receipt or creation. Email retention is managed in Microsoft Office 365.

The Department’s policies and guidelines regarding the preservation of social media records are outlined in the “Social Media Handbook for Employees.” The Department’s current policy is that federal records should not be created using text messages (because devices are not currently configured to capture text data) or instant messages (as these are considered transitory). If a federal record must be created using text messages, the DLMS instructs employees to take appropriate action to preserve the message by forwarding it to their official government email.

The need to consider electronic message capture and preservation during hardware and software upgrades is addressed by DLMS 1-500 section “538: Information Systems.” This section instructs that agencies are mandated “to establish procedures for addressing records management requirements, including recordkeeping requirements and disposition before approving new electronic information systems or enhancements to existing systems.” The DOL System Development Life Cycle Management (SDLCM) Manual provides more specific guidance on how to implement this mandate.

8. Is your agency using or exploring cognitive technologies to identify records and distinguish between temporary and permanent retention?

Note: Cognitive technologies generally describe automated technologies that can be applied to recordkeeping practices and procedures. These include Artificial Intelligence, Robotic Process Automation, Software Robot or Bot, and other machine learning technologies.

X Yes

No

Do not know

Please explain your response. (If Yes, include details on both methods and tools being explored, the level of accuracy and how that level is determined.)

The Department's Records Management program currently has a demand open with OCIO's Emerging Technology office to investigate methods for extracting metadata elements such as creation date from electronic records using machine learning. Intelligent document processing tools are being explored, including AWS Textract and Azure Form Recognizer. As the demand is still in the Proof of Concept stage, determinations about the desired level of accuracy (and how to determine that level) have not yet been made. The Department's newly-acquired ERMS also has autocategorization abilities that we plan to explore and develop as implementation progresses.

9. Do you as SAORM regularly oversee and evaluate the effectiveness of your records management program and its compliance with statutes and regulations?

Yes

No

Do not know

Please explain your response including what specific measures you have incorporated into the SAORM role.

As the SAORM, I meet regularly with the DRO to discuss the Records Management Program's progress, challenges, and future plans. I also review and approve the DRO's annual Departmental RMSA and FEREM submissions. In addition, the DLMS 1-500 serves as the Department's Records Management directive and is updated as necessary to ensure that Departmental policy is in compliance with statutes and regulations.

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

- Yes**
 No
 Do not know

Please explain your response and include any comments on existing, pending, and future topics.

The Department would appreciate more detailed guidance from NARA on how agencies should develop their CUI policy. Additionally, it would be useful for NARA to facilitate more sharing of best practices and solutions between agencies as we all transition to electronic recordkeeping and explore cognitive technologies.

11. Do you have any suggestions for how NARA can better engage with you and your program in your role as SAORM?

- Yes
 No
 Do not know

Please explain your response and include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions.