



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: Dr. Christina Handley
- Position title: Chief Information Officer and Chief Data Officer
- Address: Office of the Comptroller of the Currency
400 7th St., SW
Washington, DC 20219

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.

Office of the Comptroller of the Currency

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):

Agency personnel were provided additional information on using remote access tools and leveraging technology instead of printing hard copies.

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

Please provide details on what support is needed:

The SAORM is the CIO/CDO.

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):

All permanent electronic records are now maintained with metadata in a certified electronic recordkeeping system. We are digitizing our Corporate History Files that have many years of paper history (project delayed due to COVID-19). We need to determine if an electronic solution is legally feasible for some paper records that legally require seals or notarization.

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):

The majority of all agency business is conducted in electronic format. We are continuing to review and pursue resolution for the remaining paper-based processes. The seals/notarization is also an issue for some temporary records.

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 agency is using NARA Federal Records Center for the digitization of our Corporate History Files. The agency is also in the process of procuring a new electronic solution for mission-related records, that will include NARA Universal ERM requirements.

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):

The agency only uses NARA Federal 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):

OCC has implemented the Capstone Approach for managing emails. Senior officials' permanent electronic records are maintained in a certified electronic recordkeeping system with proper metadata and retention applied.

- 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):

We have challenges for items that legally require seals/notarizations.

- 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):

SAORM appreciates NARA's engagement to answer our questions regarding data records.