



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: Carol R. Miaskoff
- Position title: Acting Legal Counsel
- Address: Equal Employment Opportunity Commission
131 M Street, NE, Washington, D.C. 20507

1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately?

U.S. Equal Employment Opportunity Commission

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):

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:

While such a formal information governance framework does not exist, the EEOC's subject-matter expert for records management has participated on an ongoing basis in numerous information governance initiatives occurring throughout the EEOC, and regularly works with the CIO and records management staff on a variety of these initiatives. Because of these close working relationships, records management requirements are being incorporated into digital modernization efforts already underway. As the EEOC continues its work updating its records control schedules, working towards managing permanent and temporary records in an electronic

format, and updating its internal training and policies regarding records management, we anticipate that a more-formalized information governance framework will emerge.

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):

Key mission systems used by the Office of Field Programs, Office of General Counsel and Office of Federal Operations are already in compliance with many aspects of the requirement to manage permanent records in an electronic format with appropriate metadata, and these requirements will be incorporated into digital modernization efforts already underway.

The EEOC's ongoing work updating its records control schedules and updating its internal records management training and policies will enable the Agency to make progress towards this additional goal.

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):

Key mission systems used by the Office of Field Programs, Office of General Counsel and Office of Federal Operations are already in compliance with many aspects of the requirement to manage temporary records in an electronic format, and these requirements will be incorporated into digital modernization efforts already underway.

The EEOC's ongoing work updating its records control schedules and updating its internal records management training and policies will enable the Agency to make progress towards this additional goal.

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.

In late fiscal year 2019, the Technology Modernization Fund Board awarded the Agency \$4 million dollars, providing the EEOC with the resources to modernize the legacy technology and data structure of its 18-year old Integrated Mission System (IMS) over a two-year period. The TMF funds were received in January 2020 and initial development is well underway with the milestone of delivering a new Private Sector Charge Management application to both the EEOC and its Fair Employment Practice Agency (FEPAs) partners in mid-2021. One of the many benefits of this modernization effort is that it will enable the EEOC to transition to fully electronic recordkeeping in IMS.

The EEOC has also invested resources in developing in-house solutions in Microsoft 365 SharePoint, supporting individual program office 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):

EEOC does not maintain 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):

EEOC's migration to Office 365 and adoption, in 2017, of the "Capstone" approach to email management, represents significant progress towards this goal. We anticipate devoting appropriate additional resources to these efforts.

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

- X Yes
- No
- Do not know

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

We are devoting significant resources to this transition, which is progressing in coordination with the delivery of a new Private Sector Charge Management application to both the EEOC and its Fair Employment Practice Agency (FEPAs) partners in mid-2021, and improvements to the agency's online charge filing portal.

10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?

- Yes
- X No
- Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):