



## ***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: Vaughn Noga
- Position title: Chief Information Officer and Deputy Assistant Administrator for Environmental Information
- Address: U.S. EPA Headquarters, 1200 Pennsylvania Avenue, N.W., Mail Code 2810A, Washington, DC 20460

**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.*

All of the Environmental Protection Agency (EPA) is covered by this report.

**2. Has the COVID-19 pandemic impacted 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):*

As the agency SAORM and CIO, I have sent out several agency-wide emails reminding the workforce of their Records Management responsibilities as they work remotely. We have also extensively updated our SharePoint sites that provide help and information to Agency employees about records management. Many of these updates incorporated specific guidance on working in a more virtual and electronic environment spawned by the pandemic. And though unexpected, the pandemic has also forced EPA to leverage existing collaborative tools, drastically reducing the creation of paper records and improving efficiency. Further, the Agency has modified the Records Management Briefings for incoming and existing Senior Leadership and Political Appointees to accommodate the virtual workplace. We have also developed guidance on how to capture and save records created using Microsoft O365 tools and mobile devices. Lastly, in FY 2021, the Agency codified a major update to our Records Management Policy that included several updates and strengthened the Agency's guidance on managing records in a virtual environment.

**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

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.*

At EPA, the information governance framework is strengthened by consistent communication and an awareness of the importance of records management, data management, and other related information programs.

The Agency advances the implementation of records management policies, procedures, and retention schedules by providing annual mandatory online records management training to all EPA employees.

The EPA IT Strategic Framework is a five-year strategic plan that outlines a strategy for information technology and information management. The goals include Optimizing Enterprise IT Services, advancing electronic records management, transitioning paper to electronic processes, and developing processes to prevent paper being created by the agency.

**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):*

As a result of COVID, EPA staff have not had access to office space and the records that should be sent to the Archives and to the FRC. In several cases where staff could prepare boxes for the FRCs, the FRC has not been able to take records for storage and NARA's accessioning unit has not been able to take in permanent records into the Archives. EPA also continues to work with program offices and regions to transition paper processes to fully electronic processes.

However, in FY 2021, the National Records Management Program implemented an Agency-wide Disposition Strategy. This strategy, comprised of three major elements, requires each office to review records that have met their disposition and are ready to be destroyed or transferred to NARA. The National Records Management Program (NRMP) worked with the Federal Records Centers (FRC) to identify a pathway for offices to transfer records ahead of an office move and before the December 31, 2022 deadline. The EPA is also in the process of completing a data call for the purpose of an Exception Request that will be sent to NARA before the December 31, 2022 deadline.

The NRMP is working with offices to identify areas of need that might require a coordinated strategy such as commercial storage facilities after the December 31, 2022 deadline to manage records that need to be stored before they are digitized.

The Agency sponsored a working group, under the aegis of its National Records Management Program, which identified different paper processes within the agency that require submission, accumulation, and storage of paper records. The Agency will work to identify the reason why these paper processes exist and, to the fullest extent possible, work with offices to transition their legacy processes to electronic processes.

Additionally, EPA has implemented a National Digitization Program (NDP) and is in the process of standing up two Digitization Centers to digitize EPA long-term temporary and permanent records. EPA has worked closely with OMB and NARA in commenting on the proposed NARA rule for the digitization standards for permanent records. The first digitization center will open in the summer of 2022.

The Agency requires electronic systems to be registered in the Agency's Registry of EPA Applications, Models and Data Warehouses (READ), which is the authoritative source of information about EPA electronic information resources. It is a requirement that the appropriate records schedule that applies to each system also be included in READ. READ is reviewed on an ongoing basis to ensure that the records schedules assigned are accurate and that permanent records are transferred to NARA in accordance with the records schedule.

**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):*

The EPA is a vanguard in the Federal community because of the development and implementation of several initiatives to transition to electronic records.

**Disposition Strategy**

The disposition strategy has resulted in the disposition of more than 3,500 cubic feet of temporary records. The Agency continues to review its quarterly dispositions, records that were formerly held under the Tobacco Industry Litigation (TIL) Freeze and other records that are in the Agency's possession for disposition eligibility.

**National Digitization Program and National Digitization Centers**

The Agency has implemented a National Digitization Program (NDP) and is in the process of standing up two Digitization Centers to digitize EPA records. NDP has approved validation instructions and created an SOP and other instructional materials to guide the digitization of temporary records based on NARA's standards for digitizing temporary records. The first digitization center is scheduled to open in the summer of 2022.

**Update to the Agency's approved Records Management Application – Enterprise Content Management System (ECMS)**

EPA is modernizing and enhancing the Agency's electronic records management system to manage both permanent and temporary records. This effort includes making the enterprise recordkeeping system more scalable, user-friendly, quickly searchable, accurate, and cost-effective, while also providing better coordinated and effective electronic access to Agency records.

EPA is working to ensure that all closed/eligible long-term temporary analog records are transferred to the Federal Records Center before December 31, 2022 but has experienced internal delays due to COVID as well as delays due to the FRCs' operating schedule.

**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 EPA has established a strategy to survey every Program Office and Region for records that are eligible for an exception. Currently, the National Records Management Program (NRMP) is still gathering submissions from the offices. Once received, they are reviewed and analyzed for completeness. The NRMP will then aggregate like records and submit to NARA an exception that will detail the type of records, the need for the exception and the suggested plan for managing those records day-forward.

**7. New Question: 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

The EPA recently awarded a contract to replace Documentum, the underlying technology of its current Enterprise Content Management Solution, with a new records management technology. The award was restricted to Category 518210ERM – Electronics Records Management Solutions (formerly SIN 61-600) and Category 54151S - IT Professional Services. Aitheras, the contractor selected, is listed under 518210ERM.

**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 National Records Management Program conducted an Agency-wide survey to identify the amount of temporary and permanent records each program office and region had. This was done to determine whether the records were closed and going to the Federal Records Center or to the National Archives. Additionally, the National Digitization Program is currently working closely with the Program Offices and Regional Offices that have been prioritized for digitization to assist them with strategic planning.

The Agency is also working to transition paperwork processes to fully electronic processes and has recently initiated an Agency-wide reduction of copy machines.

**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 EPA has identified processes, updated systems, and developed new programs to prepare to meet the goal of fully electronic recordkeeping despite the delays imposed by the pandemic. The Agency continues to identify paper-based processes and eliminate tools that encourage the creation of unnecessary paper. The new Enterprise Content Management System will leverage Artificial Intelligence and make it easier for users to identify the correct disposition for each record that is uploaded into the system. Lastly, the Agency has invested in the development of two new digitization centers that will transform the way that the Agency is able to manage its scanning efforts but also immediately upload scans to the new ECMS.

Despite the lack of official standards for digitization of permanent records, the Agency continues to move forward in development of these new digitization centers. The EPA RM community has remained resilient and continues to work towards the goal of fully electronic recordkeeping. Though the pandemic has introduced multiple barriers that include inability to send permanent records that have met their disposition to NARA and many of the FRCs are unable to accept records, the Agency will continue to prepare these records to be transferred as soon as NARA and the FRCs can accept them.

**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):*