



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: Vaughn Noga
- Position title: Chief Information Officer and Deputy Assistant Administrator for Environmental Information
- Address: U.S. EPA Headquarters, 1200 Pennsylvania Ave 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 indicate any that are new or have been changed due to reorganization or other circumstances.

The entire Environmental Protection Agency (EPA) is covered by this report.

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.)

When the EPA was in full telework status, our reliance on paper and printing was drastically reduced. As we continue to actively reduce the amount of paper we generate and take steps to drastically limit the amount of paper we receive from the public and its customers we continue to meet the Agency's mission of protecting human health and the environment by reducing our reliance on paper.

The Agency continues to review existing business processes, programs and requirements that generate paper records to identify a new process and potential updates to existing rules that align with the Agency's digital transformation.

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.

The EPA continues to lead the Federal government in the transition to digital recordkeeping. In FY 2023, the EPA will open two state of the art digitization centers. These digitization centers will align with the NARA guidance on digitizing records. These digitization centers will reduce the Agency's reliance on the Federal Records Centers to store permanent records during their retention period and allow for the records to be digitized to the standards set forth by NARA and OMB. The Agency's Electronic Recordkeeping Transformation Strategy will ensure that the Agency will meet NARA and OMB's goal of managing permanent records electronically well in advance of the new deadline stated in M-23-07. The digitization of this information increases access, accountability, and transparency.

These records will be managed and persevered electronically in the Agency's new Agency Records Management System (ARMS). This new electronic records repository will receive newly permanent digitized records and facilitate the transfer of all permanent records to NARA.

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)

- Yes
- No
- Do not know

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

The EPA has worked tirelessly to transition to electronic recordkeeping. This benefits not only its workforce but the communities we serve. The EPA finalized the Validation of Temporary Records Procedure and Standard in response to NARA and OMB's final rule on the digitization of Temporary Records. This guidance is mandatory and provides users with specific procedure and standards necessary to create digitized versions of temporary records in source formats.

As mentioned above, in FY 2023, the EPA will open two state of the art digitization centers. These digitization centers will align with the NARA guidance on digitizing paper records. These digitization centers will reduce the Agency's reliance on the Federal Records Centers to store temporary records during their retention period and allow for the records to be digitized to the standards set forth by NARA and OMB. The Agency's Electronic Recordkeeping Transformation Strategy will ensure that the Agency will meet NARA and OMB's goal of managing temporary records electronically well in advance of the new deadline stated in M-23-07. The digitization of this information increases access, accountability, and transparency.

These records will be managed and persevered electronically in the Agency's new Agency Records Management System (ARMS). This new electronic records repository will receive newly temporary digitized records and facilitate the disposition of these records at the end of their retention.

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?

Yes

No

Not applicable, all records are in electronic format

Do not know

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

With the establishment of the National Digitization Program (NDP) and the National Digitization Centers (NDCs), the Agency has taken the necessary measures to ensure that the Agency will reduce and eventually close all records storage facilities to transfer or digitize existing temporary paper records.

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.

At EPA, the information governance framework is strengthened by a 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 and working closely with the owners of Agency IT systems to ensure that RM is incorporated into the development process. 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.

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](#))

- 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.

Guidance on the proper management of electronic records including but not limited to all electronic messages is codified in existing Records Management policy. The Agency also has specific guidance and procedures on how to manage records that are electronic messages using EPA systems. We strongly discourage the use of non-EPA systems to conduct Agency

business, however, we have provided users with guidance that echo's NARA's existing guidance to forward all records to their email within 20 days.

The Agency has an approved Capstone Schedule that covers the disposition of email. The EPA is currently working on updating its existing Capstone schedule and will submit it for review at the end of April. The policy also provides guidance on ensuring that permanent electronic records are protected against alteration, alienation, or deletion. It states that these records must be useable, searchable, and retrievable for as long as they remain in Agency custody.

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.

- 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 EPA is in the process of implementing cognitive technologies to assist in the selection of the correct disposition when uploading records into the Agency's new Agency Records Management System (ARMS). ARMS will replace the existing agency electronic recordkeeping system, the Enterprise Content Management System (ECMS). The ARMS Uploader will act as the interface for EPA users to submit records into ARMS. Within the ARMS uploader application, users will be required to assign a records schedule to an electronic record before they can submit it into the system. The ARMS Uploader provides users with the top three records schedule suggestions provided by the machine learning model. The user can then choose from one of the suggested schedules or search within the full list of schedules. This model is trained by fine tuning a large language model (LLM) and these are pre-trained on large datasets using a self-supervised learning task.

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.

In my role as the EPA SAORM, I work closely with the Office of Enterprise Information Programs (OEIP) and the Enterprise Records Management Division (ERMD) to ensure that we are meeting the necessary requirements set forth by NARA and OMB.

In an effort to reduce the EPA footprint and then in response to NARA/OMB M-19-21, I spearheaded the reduction of paper generating processes, oversee the development and implementation of the National Digitization Program (NDP) and National Digitization Centers (NDCs) and I oversee the development and implementation of the new EPA Agency Records Management System (ARMS) that will serve as the Agency's electronic recordkeeping system. I have regularly scheduled meetings with the teams implementing these initiatives and ensure that I am made aware of all updates and or changes.

These initiatives have been well communicated to not only the EPA RM community but also to the entire EPA workforce. Each year, we update the mandatory RM training to include additional guidance on managing records at the Agency.

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 EPA could benefit on specific guidance on managing previously digitized records when the permanent rule for digitization is finalized.

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.