



## *Senior Agency Official for Records Management 2019 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 13, 2020, with reports due back to NARA no later than March 13, 2020.

NARA plans to post your 2019 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, 2019.
- 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 2019 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
- Position title
- Address

- 1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.**

*Please provide list:* [Export-Import Bank of the United States \(EXIM\)](#)

- 2. Is your agency managing all permanent electronic records in electronic format as of December 31, 2019? (M-19-21, 1.1)**

- Yes  
 No

*Please explain your response:*

[By Records Management Policy 6.9.11](#), “All EXIM permanent records are managed and transferred to NARA’s custody in electronic format. No permanent records in paper media are accepted for preservation by Information and Records Management Division (IRMD). Any permanent records received by EXIM staff in paper media must be digitized upon receipt. All legacy paper permanent records must be digitized for submission to IRMD.”

- 3. 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

*Please explain your response (include specific goals and example metrics):*

[EXIM Records Management preservation archives, Electronic Permanent Records Management System \(EPRMS\)](#), implements all metadata elements mandated by NARA, as defined in NARA’s Bulletin 2015-04 Appendix A. An export of records from EPRMS with the attendant metadata suite has been tested in 2019 and found correct and adequate for accession to NARA’s custody at the scheduled time in the future.

**4. Has your agency made progress towards managing all temporary records in electronic format? (M-19-21, 1.3)**

- Yes  
 No

*Please explain your response (include specific goals and example metrics):*

EXIM is compliant with the OMB Memorandum M-19-21 1.3, stipulating that “By 2022, Federal agencies will manage all temporary records in an electronic format or store them in commercial records storage facilities.” EXIM strives to minimize its reliance on paper temporary records by modernization of existing systems. All generated paper temporary records are stored at the Iron Mountain, Inc. commercial records storage facilities.

**5. Have you, as the SAORM, taken steps to ensure that your records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures? (M-19-21, 1.4)**

- Yes  
 No

*Please explain your response (include specific goals and example metrics):*

EXIM is proactive in assuring that our records management program complies with the Federal Records Act and its regulations by insuring through strategic plans, performance goals, objectives and measures, some of which are enumerated below, that agency records are appropriately retained, stored, and transferred according to their disposition schedules.

- EXIM designated a Senior Vice President as the Senior Agency Official (SAO) for Records Management. SAO for Records Management has direct responsibility for ensuring that the agency efficiently and appropriately complies with all applicable records management statutes, regulations, and policy, including the requirements of this memorandum.
- EXIM designated Director of Records Management as an Agency Records Officer who is responsible for overseeing agency recordkeeping requirements and operations, and holds the NARA Certificate of Federal Records Management Training.
- EXIM administers annual mandatory Records Management training to inform all agency personnel of their records management responsibilities in law, regulation, and policy. The training is tailored specifically to the practices and policies of EXIM.
- All records created or maintained by the EXIM are covered by a NARA-approved records schedule and permanent records are transferred to the National Archives when they reach their scheduled disposition date.
- EXIM’s NARA-approved records schedules are media-independent and remain applicable as business practices transition to electronic workflows. EXIM’s records

types inventories and EXIM's record schedules are reviewed annually to assure completeness, accuracy, and business relevance.

- Identify and establish records control requirements in order to include the resource estimate of implementation records controls in all EXIM's electronic temporary records systems in the agency's IT Capital Planning and Investment Control (CPIC) process and IT Strategic plan to compliant with the OMB Memorandum M-19-21, Transition to Electronic Records.

- 6. If applicable, have you identified all agency-operated records centers and made plans to either close them before 2022, or have you submitted a request to NARA for an exception? (M-19-21, 1.3)**

**NOT APPLICABLE.**

Yes

No

*Please explain your response (include specific goals and example metrics):*

EXIM does not operate any records centers.

- 7. Does your agency have procedures that include documentation to ensure records of 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

*Please explain your response (include specific details of procedures):*

All incoming EXIM staff, including the senior officials, receive an on-boarding Records Management briefing on appropriate records keeping. Permanent records of the senior officials, including their Capstone email, are incrementally ingested to EPRMS preservation archives on an annual basis. All outgoing EXIM staff, including the senior officials, receive an off-boarding Records Management briefing and execute a sign-out procedure with their immediate supervision, the Office of the General Counsel for senior personnel, and the Records Management representative, to ensure

that their records are properly captured and/or processed and not improperly removed, altered, or deleted. Additionally, at the time of departure from EXIM of the senior officials, Records Management staff in consultation with General Counsel for Administration and the business support staff of the departing officials, perform the final inventory of the official's records, including Capstone email, and assure records disposition at the scheduled time, as dictated by the applicable records schedule items.

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

Yes

No

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

While EXIM is well on its way to minimizing creation of any new records in paper form, the most significant challenge to meeting the goal of fully-electronic recordkeeping in the near-term is the volume of existing temporary records with a long-term lifecycle that are in paper format. In order to transition to fully-electronic recordkeeping before the end of the active use or the scheduled post-cut-off preservation term for these records, the records would need to be digitized. Digitization of large volumes of paper records is constrained by the agency's budgets.

**9. Do you need support from NARA to ensure a successful transition to fully-electronic recordkeeping?**

Yes

No

*Please provide details on what support is needed:*

For EXIM, as a small agency, prioritizing and allocating appropriate funding for the modernization of the agency's IT and electronic business systems is one of the critical factors that would enable the agency's success in transitioning to fully-electronic recordkeeping. In the effort of complying with the OMB Memorandum M-19-21 1.3, mandate that "By 2022, EXIM will work toward all temporary records in an electronic format or store them in commercial records storage facilities", records control requirements implementation will be included in the business use cases for modernizing EXIM's IT systems and CPIC process for IT investment and strategic planning.