



Senior Agency Official for Records Management 2023 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 8, 2024, and reports are due back to NARA no later than March 8, 2024.

NARA plans to post your 2023 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 2023 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: Howard Spira
- Position title: Senior Vice President and Chief Information Officer

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

This report covers the entirety of the Export Import Bank of the U.S.

2. Will your agency 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
 Not applicable, all records are in electronic format

If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)

3. Will your agency 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)

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- Yes
 - No
 - Not applicable, all records are in electronic format

EXIM is compliant with the OMB Memoranda M-19-21 1.3 and M-23-07 1.3, stipulating that “by June 30, 2024, all temporary records in Federal agencies must be managed electronically to the fullest extent possible. Agencies may continue to produce and store certain records in analog formats if they receive a limited exception from NARA for one of the reasons established in paragraph 1.2, but all other inactive records eligible for transfer after June 30, 2024, must be stored in commercial storage facilities [...] Temporary analog records that become eligible for transfer after June 30, 2024 must be transferred to commercial storage facilities that meet NARA records storage requirements”

EXIM strives to minimize its reliance on paper temporary records by modernization of existing systems and processes. All recent, inactive paper temporary records are stored at the Iron Mountain, Inc. commercial records storage facilities. EXIM Records Management (RM) Unit has worked with the Office of the General Counsel to identify the small number of specific temporary records that still are required to be instantiated in paper due to the legal constraints of international agreements and to make progress across the agency in limiting the handling of all other paper temporary records. A concerted effort has been made to advocate with the Bank’s senior staff and to educate all agency staff on creation, conversion to, and management of temporary records in electronic format only.

4. 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 by June 30, 2024? (Choose all that apply)

- Yes
- No
- Not applicable, my agency does not have agency-operated records storage facilities
- Not applicable, all records are in electronic format

If ‘No,’ why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)

5. Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 and transfer inactive records to a NARA Federal Records Center (FRC) or commercial storage facilities by June 30, 2024? (Choose all that apply)

- Yes, we will transfer to the FRC
- Yes, we will transfer to commercial storage facilities
- No

Not applicable, all records are in electronic format

If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)

6. Does your agency have a Data Management Strategy that includes records management principles? (<https://www.archives.gov/files/records-mgmt/resources/cdo-rm-assessment-report.pdf>)

Yes

No

Please explain your response.

7. In your role as SAORM, do you meet with your Agency Records Officer(s) to discuss the agency records management program's goals?

Yes

No

Not applicable, my agency does not currently have a designated Agency Records Officer

ARO and SAORM meet at least once every two weeks. All aspects of the records program are discussed: budget, staffing, major initiatives, compliance, training, hiring, contracts, etc.

8. Has your agency incorporated NARA's digitization standards into your Information Resource Management (IRM) Strategic Plan? (44 U.S.C. 3506(b)(2) and OMB Circular A-130)

Yes

No

Not applicable, my agency is not currently digitizing records

EXIM is aware of and compliant with NARA's digitization standards. However, the Bank has no major scanning initiatives. Scanning is small scale, done office by office, and on an ad hoc basis. NARA regs are followed when offices contract for scanning services or perform scanning in house. Scanners at the Bank comply with NARA regulations and mandated QA/QC is enforced through RLO awareness activities and training.

9. Does your agency have a social media strategy that includes capturing and maintaining records in accordance with records management statutes and regulations?

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- Yes
 No

Our social media strategy is to capture social media records depending on the file plan allocation. The captured records are scheduled as DAA-0275-2014-0001-0008 temporary or GRS as appropriate. We also reiterate responsibilities for managing social media in RM Policy and remind RLOs of their responsibilities in this regard.

10. Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?

- Yes
 No

In FY 2023, as previously, EXIM received effective support from the NARA appraisal and accessioning staff in development of new Records Schedules, schedule adjustments, and other records management issues. While we rely on being able to consult with NARA for variety of records management questions, there isn't any specific area where we can anticipate needing extensive support.