



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. 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: Cheryl Campbell
- Position title: Assistant Secretary for Administration
- Address: 200 Independence Avenue, S.W., Room 309F, Washington, DC 20201

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.

Office of the Secretary (OS), and its 16 Staff Divisions:

1. Immediate Office of the Secretary (IOS)
2. Assistant Secretary for Administration (ASA)
3. Assistant Secretary for Financial Resources (ASFR)
4. Assistant Secretary for Health (ASH)
5. Assistant Secretary for Legislation (ASL)
6. Assistant Secretary for Policy and Evaluation (ASPE)
7. Assistant Secretary for Preparedness and Response (ASPR)
8. Assistant Secretary for Public Affairs (ASPA)
9. Center for Faith-Based and Neighborhood Partnerships (CFBNP)
10. Departmental Appeals Board (DAB)
11. Office of Civil Rights (OCR)
12. Office of the General Counsel (OGC)
13. Office of Global Affairs (OGA)
14. Office of Inspector General (OIG)
15. Office of Medicare Hearings and Appeals (OMHA)
16. Office of the National Coordinator for Health Information Technology (ONC)

And 11 Operating Divisions:

1. Administration for Children and Families (ACF)
2. Administration for Community Living (ACL)
3. Agency for Healthcare Research and Quality (AHRQ)
4. Agency for Toxic Substances and Disease Registry (ATSDR)
5. Centers for Disease Control and Prevention (CDC)
6. Centers for Medicare and Medicaid Services (CMS)
7. Food and Drug Administration (FDA)
8. Health Resources and Services Administration (HRSA)
9. Indian Health Service (IHS)
10. National Institutes of Health (NIH)
11. Substance Abuse and Mental Health Services Administration (SAMHSA)

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):

Due to the COVID-19 Pandemic, there have been challenges for records management staff to access offices and proceed with digitizing paper records to achieve compliance with OMB and NARA Joint Directive, M-19-21; complete records management disposition activities; as well as complete paper records transfers to NARA.

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.

The Records Management program resides in the Office of the Chief Information Officer (OCIO), logistically are in direct contact with the HHS's Chief Information Officer (CIO), Chief Data Officer, Chief Information Security Officer, and executive level managers from ITIO, and Privacy, who cooperate with the RM program in the context of pursuing major agency-wide IT initiatives to be in compliance with federal mandates. For example, the HHS Policy for IT Enterprise Performance Life Cycle (EPLC) includes an appointed Records Management SME as a key critical partner along with Enterprise Architecture, Security, Acquisition, Budget, Capital Planning and Investment, and Performance in consultative and assessment roles to ensure all SME areas, including the RM program, are complied with and taken into account in CIO governance decisions. Additionally, the HHS Policy for IT Portfolio Management, published in September 2021, states that all IT Investments and systems undergoing governance decisions for approval, maintenance or disposition must be in accordance with HHS Records Management, Security and other appropriate HHS policies and procedures

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):

Joint Due to the COVID-19 Pandemic, there have been challenges for records management staff to access offices and proceed with digitizing paper permanent records to achieve compliance with OMB and NARA Directive, M-19-21.

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):

Due to the COVID-19 Pandemic, there have been challenges for records management staff to access offices and proceed with digitizing any paper temporary records to achieve compliance with OMB and NARA Joint Directive, M-19-21. To the extent possible, the HHS records management community is working with information technology and electronic mail support teams on implementing appropriate records retention schedules for temporary records. Currently, HHS has a tenant-wide Microsoft 365 (M365) retention policy that holds all user data for a 7-year period, based on last modified time (for email, this is same as creation time). HHS is working on gathering the relevant data to create retention policies to match the 3-year and 15-year Capstone employee designations.

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.

Due to certain challenges during the COVID-19 Pandemic, HHS component agencies may submit to NARA a request for an exception to the M-19-21 requirement before December 31, 2022.

7. 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

Please explain your response. If 'Yes,' please include specific examples and how this will support records management processes. If 'No' or 'Do not know,' please explain.

HHS continues to explore various electronic recordkeeping options including Microsoft 365 functionalities.

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.

HHS is currently using commercial storage facilities to store temporary records. HHS is working to fully manage temporary records in an electronic format in accordance with the M-19-21 requirement by the December 31, 2022 deadline or later, if requirement deadline is extended.

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):

Currently, there are some challenges concerning budgetary constraints and having the manpower to digitize and fully convert into a fully electronic environment.

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):