



## *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.

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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](mailto: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: 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 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)

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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. 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.)*

In response to the COVID-19 pandemic, HHS transitioned to primarily remote work/telework based on the employee's roles and responsibilities. Due to this new operating model, HHS staff produced and maintained only electronic records. Cloud services such as M365 were leveraged to maintain electronic records. COVID accelerated the transition to electronic records, but delayed the digitizing of legacy records.

**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 Department and its components are diligently working on transitioning to a fully electronic permanent records management environment. Across the Department, staff have

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been creating and maintaining all newly created permanent records in an electronic format and ensuring that records are labeled with the appropriate metadata. Now that HHS staff have the flexibility to access their offices, staff are proceeding with digitizing legacy paper permanent records to assist HHS with achieving compliance with M-19-21 and M-23-07, as well as resume the accessioning of any existing paper permanent record transfers 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 Department and its components are diligently working on transitioning to a fully electronic temporary records environment. Across the Department, staff have been creating and maintaining all newly created temporary records in an electronic format, ensuring that records are labeled with the appropriate metadata, and securely storing in file directories or other document repositories such as correspondence management systems, SharePoint, Documentum, etc. To the extent possible, the HHS information technology and electronic mail support teams have implemented appropriate records retention schedules for temporary records. HHS has a tenant-wide Microsoft 365 (M365) retention policy that holds all user data for a 7-year period which is based on the last modified time (for email, this is same as creation time). HHS continues to work on gathering the relevant data to create retention policies to align with the 3-year and 15-year Capstone employee designations.

**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.*

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 and M-23-07 requirements by the June 30, 2024, deadline. Although HHS has specific cases that are considered exceptions, HHS is actively looking into ways to minimize exceptions.

**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,**

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**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.*

The Records Management (RM) program resides in the Office of the Chief Information Officer (OCIO) and works in collaboration with the following individuals and offices across the Department: Chief Information Officer (CIO), Chief Data Officer (CDO), Chief Information Security Officer (CISO), executive level managers from the Information Technology Intermediate Office (ITIO), the Privacy Office, and HHS component Records Managers. Together, these individuals assist the RM program with pursuing major agency-wide IT initiatives to enable HHS 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 who serves as a critical partner along with Enterprise Architecture, Security, Acquisition, Budget, Capital Planning and Investment, and Performance. The SMEs are responsible for reviewing major agency-wide IT initiatives to ensure requirements, including RM program requirements, are taken into consideration in all 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.

**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

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*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.*

HHS leverages Microsoft 365 (M365) for email purposes throughout the Department; however, HHS has multiple tenants managed by the HHS subcomponent agencies. All HHS tenants are configured with a retention policy that holds all user data for a 7-year period, based on the last modified time (for email, this is same as creation time). HHS continues to work on gathering the relevant data to create retention policies to aligns with the 3-year and 15-year Capstone employee designations. Currently, HHS relies on end users to capture and preserve text messages transmitted through government-furnished mobile devices. HHS is currently pursuing a solution to automatically capture employee text messages.

**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.)*

HHS and subcomponent agencies are exploring the following methods: smart devices, geographic information systems, robotic process automation, software robot or bot, supervised and unsupervised machine learning, standard and open-source artificial intelligence, and tools to collect text message data transmitted through government furnished mobile devices.

**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.*

The SAORM actively works with both the HHS CIO and CDO to oversee and evaluate the effectiveness of the HHS Records Management Program. In partnership, the HHS CIO and HHS CDO conduct reviews and evaluations of records management policies, training, and IT resources across the Department in support of the OMB-NARA Joint Directives, M-19-21 and M-23-07.

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**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.*

**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.*