



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: William D. Spencer
- Position title: Acting Executive Director
- Address: 1615 M Street, NW, Suite 500
Washington, DC 20419

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.

U.S. Merit Systems Protection Board (MSPB)

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):

MSPB tailored specific records management policy and guidance regarding managing records while working in a remote environment and disseminated the information to all employees. Within this guidance, MSPB encouraged employees, where possible, to maintain electronic records in an electronic format. MSPB continued its effort to move to fully electronic recordkeeping during the COVID-19 pandemic.

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.

In FY 2021, MSPB hired a Chief Information Security Officer which complements the additions of the Records Officer, Chief Information Officer, and Accessibility Program Manager in FY 2020. These positions are part of a broader effort within MSPB to further integrate information technology (IT), information security, privacy, FOIA, records management, and accessibility and support MSPB's statutory missions to adjudicate Federal employee appeals and conduct studies of the merit systems. As a small agency, MSPB's SAORM also serves as its Chief Data Officer, helping to ensure that data management is incorporated into the information governance framework. Stakeholders within the program offices listed above meet regularly to coordinate cross-cutting projects.

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):

MSPB has made limited progress in this area due to challenges presented by the ongoing COVID-19 pandemic. However, MSPB's records management, IT, and program staff are beginning to discuss the requirements to ensure permanent records have appropriate metadata. This effort also overlaps with MSPB's current IT modernization initiative to configure and prepare to migrate to a new document management system, where MSPB currently stores most of its permanent records. Records management and IT staff expect to expand these initial efforts to ensure electronic records are managed with their associated metadata, which currently may be stored in a separate location.

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):

The vast majority of MSPB's temporary records consist of appeal files that support our adjudicatory mission. In FY 2021, MSPB implemented a policy requiring that all newly docketed appeals must be managed in electronic format. However, as a result of MSPB's five-year lack of quorum that began in January 2017, MSPB has a backlog of approximately 3,600 appeals, about half of which contain records in paper format. MSPB has allocated resources to convert these temporary records to electronic format, but the quality control necessary to properly convert complex paper case files to electronic records and ensure the integrity of the record, coupled with the effects of the pandemic on in-office staffing and capacity, has limited progress. Additionally, resource limitations have impacted the ability of MSPB's new Records Officer – who joined MSPB in August 2020 – to inventory all MSPB program offices to identify whether there are limited categories of non-adjudicatory temporary records that are still managed in paper. MSPB is committed to meeting the goals of M-19-21 but anticipates it will continue with these efforts beyond December 31, 2022.

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.

Please see the answer to Question 5 above. We expect to submit an exception request during FY 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.

As MSPB transitions to electronic records management amid the modernization of our IT systems, we have only relied on internal staff for work related to this effort because of the complexities of the impact of the modernization on our processes, our policies, and our records. MSPB continues to make progress in the areas of electronic case files and digitization. We are aware of the need for system automation for electronic records, especially as it pertains to disposition, and we will work to determine whether we can utilize the General Services Administration's Special Item Number for Electronic Records Management.

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.

MSPB does not, and has no plans to, utilize commercial storage facilities to meet the requirements of

goal 1.3 of M-19-21. We plan to gradually decrease the footprint of legacy records within our agency as well as those records housed at Federal Records Centers through appropriate disposition channels.

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):

MSPB is a small agency with an authorization of 235 FTE, including one full-time records management staff member – the Records Officer. FY 2021 was the first full year that MSPB’s current Records Officer was with MSPB, and he envisions bringing continuity to records operations at MSPB and building out a sustainable electronic records management program. However, the continuing operational challenges presented by the COVID-19 pandemic throughout FY 2021 and into FY 2022 have affected MSPB’s overall efforts to meet the goal of fully electronic recordkeeping.

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):

MSPB is interested in case studies of small agencies that have successfully transitioned to fully electronic recordkeeping. Additionally, MSPB is interested in exploring shared services agreements with other agencies to meet the requirement to transition to fully electronic recordkeeping.