



**NASA’s Response to Managing Government Records Directive  
Senior Agency Official for Records Management (SAORM) Annual Report – 2023**

I am pleased to provide NASA’s SAORM Annual Report for 2023.

NASA’s Office of the Chief Information Officer (OCIO) invested in organizational restructuring between 2021-2022. The restructuring transferred CIO core IT services (policy and procedures) and IT product responsibilities from 10 NASA Centers to OCIO Agency Offices and OCIO Service Lines. Records Management was included in the restructuring and is now a service within NASA Information, Data and Analytics Services (IDAS).

The 2023 report is reflective of our overall Agency compliance. However, our lower self-assessment grading is intended to standardize and objectively normalize reporting previously performed in a distributed degrees of distributed progress. Additionally with this submittal, we report NASA will not meet the deadline as fully compliant with all OMB M-23-07 mandates nor implementation of NARA permanent records digitization standards. In the next 2 months we will complete a comprehensive analysis of current state and expect to request exceptions to OMB requirements; most significantly, transfer of analog permanent records to the Archives after June 2024.

I appreciate your continued efforts to assist federal agencies in addressing challenges in electronic records management challenges. We look forward to continued collaboration with you and other agencies toward the goal of preserving our Agency’s legacy through its records.

Please feel free to contact the following with questions concerning our submitted SAORM Report.

**NASA Information, Data and Analytics Services (IDAS) Director**

|              |                     |
|--------------|---------------------|
| <b>Name:</b> | <b>Karen Fallon</b> |
| Agency Name: | NASA                |
| Component:   | Headquarters        |
| Office:      | Office of the CIO   |
| Title:       | Director, IDAS      |

**NASA Agency Records Officer:**

|              |                        |
|--------------|------------------------|
| Name:        | Patti Stockman         |
| Agency Name: | NASA                   |
| Component:   | Headquarters           |
| Office:      | Office of the CIO      |
| Title:       | Agency Records Officer |

Regards,

Electronic Concurrence

3/5/2024

Jeff Seaton  
NASA Chief Information Officer

## *Senior Agency Official for Records Management 2023 Annual Report*

- Name of SAORM: Jeff Seaton
- Position title: NASA 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?**

*Please provide a list and indicate any that are new or have been changed due to reorganization or other circumstances.*

The SAO is responsible for Records Management (RM) for the entire Agency.

**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? (M19-21, 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.)*

NASA expects to submit an exception request to NARA. The SAORM has invested in a special project to fully analyze the Agency's progress toward meeting the M-23-07 goals, time it will take to become compliant, and identify areas for inclusion in a NASA exception request. In addition, NASA is conducting a thorough evaluation of NARA's digitization requirements and guidance to determine how our Agency might use them to help achieve M-23-07 goals.

At this point, the Agency has not been able to identify any instances of continued generation of analog records with the exception of some forms discussed in Question 3. In 2023, NASA processed 40 direct transfer requests for approximately 475 cubic feet of permanent analog records from NASA Centers to the National Archives. During 2018-2022 NASA transferred approximately 8,170 cubic feet from NASA to the Archives.

However, NASA still holds roughly 4,000 cubic feet of potentially permanent analog records in onsite records staging facilities. Records management personnel are working toward established quarterly goals to appraise and disposition them, transferring verified permanent collections to the National Archives. NASA will request M-23-07 exception in order to transfer those records determined as permanent after June 30, 2024.

Two significant initiatives evidencing NASA's due diligence toward the goal of all digital records management are:

- 
- The Agency developed and deployed Organizational Records Inventory (ORI) application that is almost completely populated by all NASA Centers with initial RM baseline content representing. Every NASA Center is entering local summary information into the ORI including records series identification for each Center organization. Once fully populated, NASA will have improved visibility of collections to include holdover analog records as well as new analog records still being created. For each discovery identified, records management professionals will explore with the owning organization whether creation of such analog records is regulatory driven. If it is not, NASA will work with the organization to revise its processes to create and manage only digital records.
  - Work continues in support of transferring still imagery records to NARA in 5-year increments. Still imagery digitization for 1959-1963 is nearing completion. Work continues in meta-data assignment and preparations for mandatory shipping protection protocols. Johnson Space Center (JSC) is coordinating with NARA for a planned transfer target of Q3FY24. JSC is also working with Ames Research Center to complete the migration of the aerial imagery collection.  
Challenge: Lack of resources

**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)**

- 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.)*

Temporary records are now being generated almost exclusively as digital records. The one exception of which the Agency is aware, for which we're developing a strategy to reduce, is that some forms are created in analog format due technology shortfalls and physical challenges:

- Users who must complete forms away from their desks may not have the digital devices available for form completion.
- There is a gap where mobile authentication currently used is not compatible with NASA's current forms solution, making users unable to access the forms solution with their NASA-issued mobile devices.

Several NASA Centers have staging facilities from which NASA Centers destroyed 2,380 cubic feet of temporary analog records in 2023, with 13,960 cubic feet remaining. We anticipate some of these records remaining in Agency staging facilities beyond June 30, 2023, for the duration of their retention periods. However, M-23-07 does not require closure of these facilities.

**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.)*

Agency on-site storage spaces are less than 25,000 cubic feet capacity and, therefore NASA does not operate any Agency records facilities that must be closed under M-23-07.

**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.)*

This question is not applicable, but not because all records are in electronic format. NASA interprets the memo requirement of moving inactive records to FRCs or commercial facilities as applicable to holdings in Agency records centers. NASA's several staging facilities where we anticipate continuing to hold temporary records for remainder of their retentions are not subject to the requirement to move them.

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

- Yes
- No

*Please explain your response.*

NASA Data Strategy does not address records management. However, an update and expansion of the strategy is planned this year and will incorporate records management principles and controls.

---

**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

*Please explain your response. (If 'Yes,' please include how often, a description of topics, and outcomes of these meetings. If 'No,' please explain why not.)*

As SAORM, who is the NASA CIO, is in communication throughout the year with the Agency Records Officers and/or her management who ensure he stays abreast of developments and progress in, as well as challenges encountered by, the NASA records management program. Topics include but are not limited to updating Capstone Official positions, progress of the Organizational Records Inventory tool, Agencywide Records Management communications, and progress toward compliance with OMB M-23-07.

**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

*Please explain your response. (If 'Yes,' what steps have been taken? If 'No,' why not?)*

Our staff is still working to fully digest all NARA's standard and associated guidance to determine what clarification we require and how best to apply it with regard to NASA policies and procedures.

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

- Yes  
 No

*Please explain your response.*

---

NASA's internal online Social Media Guidance discusses social media content as Federal records. It addresses what constitutes Federal records, criteria to help determine whether the content qualifies as records, general discussion of retention of content, as well as links to NARA and other resources on social media relative to records. We plan development of further policy enhancement on social media content as records and technical attention to its maintenance as records.

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

Yes

No

*Please explain your response and include any comments on existing, pending, and future topics.*

It would be helpful if NARA would provide SAORMs insight into applications or solutions agencies are utilizing to manage their non-email electronic communications, together with which agencies are using them. That will enable easier collaboration among agencies.

Need simpler NARA methods for applying disposition authorities to both digitized and born-digital records for which analog versions are covered by legacy approved schedules. The format of records does not change their functional, nor operational, and historic value. It seems that, in cases where digital records have the same sort of content as their analog predecessors and are used in the same manner, there should be a streamlined method to update their previously approved retention schedules.

NASA has not completed full digestion of NARA's Digitization standard for permanent records, and the associated guidance including the Quality Management Guide for Digitized records. However, when we are well into our evaluation of all the prescribed processes, we anticipate the need for an in-depth clarifying discussion with NARA. Hopefully, we will be able to partner with NARA to establish acceptable avenues to enable compliance.