



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: Linda Dent
- Position title: Deputy General Counsel
- Address: 1775 Duke Street, Alexandria, VA 22314

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.

National Credit Union Administration

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):

The NCUA has used electronic information systems to create, capture, and maintain records for many years, and most of the agency's business processes are electronic. In general, the NCUA's technology enables staff to access records remotely, which facilitated a smooth transition to the agency's mandatory off-site posture in March 2020. However, at that time, the NCUA was receiving a few records by mail, e.g., invoices from some vendors. The agency adjusted processes and procedures, and now digitizes mail and receives more correspondence electronically.

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 SAORM, who also serves as Senior Agency Official for Privacy and Chief FOIA Officer, is a member of the NCUA Enterprise Data Governance Council (EDGC). The EDGC is comprised of agency managers representing stakeholder offices, including the Office of the Chief Information Officer (OCIO), and supports the NCUA Chief Data Officer to achieve the goals of the agency's Enterprise Data Program. Among its other responsibilities, the EDGC champions enterprise data governance in and across NCUA offices.

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):

The NCUA Records Management Program Instruction, an agency-wide policy, requires the agency to conduct business electronically to the maximum extent possible. As noted above, most NCUA business is conducted electronically. The NCUA has inventoried electronic information systems that house electronic records, including permanent records, and aligned them with applicable records schedules. The agency also continues to expand the use of office file plans to manage records, including permanent records, in an electronic format. Records program staff, working with office Records Liaisons, have approved file plans for all but one of the NCUA's offices, with the remaining file plan in development.

The NCUA utilizes NARA's recommended Capstone approach for managing email of designated officials as permanent records and email of all other staff as seven-year records. NARA approved the agency's Capstone implementation in 2016. Records program staff are responsible for compliance with Capstone, e.g., tracking incoming and separating Capstone officials, and work with OCIO to implement Capstone. The NCUA has developed procedures for the transfer of Capstone official email to NARA.

Records program staff are involved in the NCUA's System Development Life Cycle (SDLC) process. The SAORM is a member of the Information Technology Oversight Council (ITOC). The ITOC is comprised of agency senior managers and allocates budgetary resources to support the agency's IT needs, including management of permanent electronic records. Records program staff participate and address records management in the Enterprise Solution Modernization (ESM) initiative, a multi-year effort to modernize mission-related systems. Systems developed in the ESM initiative will provide more functionality for the management of electronic records,

including permanent records. Records program staff are also involved in the current modernization of the agency's email system and are developing recommendations to utilize the increased records management functionality in the modernized system, including for permanent records. As part of mid- to long-range planning, Records program staff are working with OCIO to obtain and implement an Electronic Records Management System (ERMS) for agency records.

The NCUA made its first transfer of permanent electronic records (cancelled Instructions) to NARA in FY 2020 and again transferred permanent electronic records (cancelled Instructions) to NARA in FY 2021. The agency has developed procedures for migration of records, including permanent records, into new systems for long-term preservation. The NCUA also uses its eLibrary, an electronic records archive, to house and provide access to certain permanent records with NARA-required metadata. Based on a recommendation in NARA's Multi-Agency Inspection (MAI) Report (see below), the NCUA has developed an eLibrary file plan and disposition procedures for more effective management of records in eLibrary, including permanent records.

The NCUA continues to accession eligible analog permanent records to NARA. Subject to a return to on-site operations, the agency plans to inventory remaining analog permanent records and determine whether to store them at a Federal Records Center (FRC) prior to the end of 2022 or digitize them consistent with NARA requirements.

In January 2022, NARA issued a MAI Report, Management of Permanent Regulatory Records, dated December 2021. The inspection covered six agencies, including the NCUA, and stated that the "NCUA should be able to effectively meet the requirements of OMB/NARA 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):

Please see the response to question 4. In addition, and as in previous years, Records program staff conducted a Records and Information Management (RIM) effectiveness evaluation of an NCUA office in 2021. The 2021 evaluation (like the 2020 evaluations) focused on records management in the mandatory off-site posture due to the pandemic and found that the office's electronic recordkeeping enabled a smooth transition to remote work. The agency plans to complete another office evaluation in 2022.

The MAI Report included the NCUA's RIM effectiveness evaluations in a section on noteworthy practices, stating that the agency's program, with an office questionnaire, site visit (conducted virtually during the off-site posture), and written report with findings and recommendations was "of particular note".

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 responses to questions 4 and 5. The NCUA does not believe its recordkeeping practices require an exception to the M-19-21 requirements.

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.

The NCUA may utilize the GSA Special Item Number as the agency further develops its management of electronic records, e.g., in connection with obtaining and implementing an ERMS.

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.

The NCUA has no agency-operated storage facilities for its records. The agency utilizes commercial records storage facilities to store certain records of its Asset Management and Assistance Center (AMAC). These commercial facilities meet NARA requirements. With the transition to electronic recordkeeping as required by M-19-21, the NCUA does not anticipate a need for commercial storage in addition to AMAC's.

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):

The NCUA is on track to meet the requirements of OMB-NARA M-19-21 for fully electronic recordkeeping. Legacy information systems require the development of additional processes and procedures for the agency to implement disposition consistently. In addition, further involvement of Records program staff in the SDLC will enable the agency to acquire and deploy new systems with more robust records management functionality.

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):

We recommend that NARA continue to make SAORM meetings available remotely after agencies return to on-site operations, to facilitate participation.