



**Senior Agency Official for Records Management  
2020 Annual Report**  
National Indian Gaming Commission

- Name of SAORM: Christinia Thomas
- Position title: Deputy Chief of Staff
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**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.*

All components of the National Indian Gaming Commission are covered by this report. None are reporting separately.

**2. Has the COVID-19 pandemic changed any 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 agency's record schedules were transitioned to all-electronic schedules in 2017. By that time, recordkeeping had already been substantially built around electronic archiving. In fact, prior to the pandemic, many employees were already teleworking regularly at least once per week and, in some cases, on a full-time basis. For this reason, moving to an all-virtual office environment in response to the pandemic was not a difficult adjustment.

3. **Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)**

Yes

No

Do not know

*Please provide details on what support is needed:*

In terms of the agency's organizational structure, records and information management staff positions have been integrated into the Division of Technology (DoT) and the Agency Records Officer reports directly to the Chief Information Officer. The DoT itself is within the Office of the Chief of Staff and the agency's SAORM is the NIGC's Deputy Chief of Staff.

4. **Has your agency made progress towards managing 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 and example metrics):*

Since 2017, all agency records are archived and managed in electronic format. The NIGC's current challenge is to begin consolidating its many different record group systems into a centralized archive with more standardized processes and metadata elements. In 2020, the RM program focused on centralizing and meta-tagging its permanent collections and by the end of that calendar year, had completed approximately half of these record items.

5. **Has your agency made progress towards managing 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 and example metrics):*

Since 2017, all agency records are archived and managed in electronic format. The NIGC's current challenge is to begin consolidating its many different record group systems into a centralized archive with more standardized processes and metadata elements. In 2020, the RM program worked with temporary record groups in an effort to standardize filing practices and file naming

conventions. The overall goal was to ensure that file plans were updated and that record holders knew the location of where official copies were kept and this goal was achieved.

**6. Is your agency investing resources in IT to support the transition to electronic recordkeeping?**

Yes

No

Do not know

*Please explain your response. If Yes: Please include specific examples of resources and how this will support records management processes. If No or Do not know: Please explain.*

Yes, the agency has planned investments for a secure file transfer solution to provide a solution for the secure transfer of sensitive documents between the agency and external stakeholders to minimize the use of traditional mail submissions. Additionally, the agency has increased investments in improving and securing the use of Microsoft Office365 cloud services to promote and support the centralization of agency files and records. The major project in FY21 will establish Identity Access Management services to enable use of digital signatures across the agency and a complete review of records retention policies and baseline implementation of information rights management policies.

**7. To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)**

Yes

No

Do not know

*Please explain your response (include specific goals and example metrics):*

N/A, the NIGC does use commercial storage for holding records.

**8. Does your agency have policies and procedures that include documentation to ensure records of newly appointed and outgoing senior officials\* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?**

\*Senior officials are the heads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions.

Yes

No

Do not know

*Please explain your response (include specific details of policies and procedures):*

Not at this moment, however, policies are currently under development to ensure that records management requirements are integrated into onboarding /outgoing processes for senior officials.

**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 NIGC is currently undergoing a reconfiguration of its IT systems and, although this will present new RM challenges, it will open up new opportunities for RM controls and oversight. As the volume of data and information exponentially increases, systems will need to move away from reliance on end-user compliance and more on automated systems and oversight of such systems.

**10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?**

Yes

No

Do not know

*Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):*