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 rmselfassessment@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: Christinia Thomas
• Position title: Deputy Chief of Staff
• Address: 90 K St. NE Washington DC

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 impacted policies or practices related to records management at your agency?

☐ Yes
X No
☐ Do not know

Please explain your response (include details of specific challenges, if applicable):

In 2017, the agency updated its records schedules and officially transitioned to an all-electronic recordkeeping format. By that time, the agency had accumulated a substantial electronic archive and scanning/processing electronic documents had become commonplace. In 2020, when the Covid-19 pandemic compelled the Federal government to shift its workforce to maximum telework, the NIGC was ready. For these reasons, the COVID-19 pandemic has not impacted the policies or practices related to records management at the NIGC.

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)

X Yes
☐ No
☐ Do not know
The Records Management Office is situated within the Division of Technology (DoT) and the Agency Records Officer (ARO) reports directly to the Chief Information Officer. The Records Management Office, which includes the Agency FOIA Office and the Agency Privacy Office, oversees agency responses to FOIA and Privacy Act requests and provides subject matter expertise to the Commission on Privacy matters. Being a part of the DoT, it is actively involved in developing policies related to data governance and, in particular, oversees agency compliance with (privacy-related) NIST 800-53 technical requirements.

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)

   X Yes
   ☐ No
   ☐ Do not know

   *Please explain your response (include specific goals, example metrics, and/or challenges):*

   Since 2017, all agency records transitioned to being archived and managed in electronic format under all-electronic (approved) schedules. This year, building on its work in 2020, the RM program focused on centralizing and meta-tagging its permanent collections and, as of the end of the year, had largely accomplished this goal.

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)

   X Yes
   ☐ No
   ☐ Do not know

   *Please explain your response (include specific goals, example metrics, and/or challenges):*

   Since 2017, all agency records transitioned to being archived and managed in electronic format under all-electronic (approved) schedules. In the case of structured records, they are managed as part of an electronic recordkeeping system. In the case of some unstructured records, those permanent (or important/often-accessed temporary) records are managed in collections, categorized within library and folder structures, and ordered by naming conventions that employ consistent metadata terms. In other cases, unstructured temporary records are simply managed in place.

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
X 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.

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
X 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.

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
X 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.

9. Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?

☐ Yes
X No
☐ Do not know

Please explain your response (include details of specific challenges, if applicable):

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):*