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. This year’s SAORM report provides an opportunity for agencies to report on plans and progress towards the milestones and target goals in this memorandum, as well as other important records management initiatives.

The reporting period begins on January 13, 2020, with reports due back to NARA no later than March 13, 2020.

NARA plans to post your 2019 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, 2019.
- 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 2019 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: Debra A. Hall
- Position title: Executive Director
- Address: Occupational Safety and Health Review Commission
  1120 20th Street, NW 9th Floor
  Washington, DC 20036-3457

1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.

   Please provide list:

   Agency: Occupational Safety and Health Review Commission (OSHRC)

2. Is your agency managing all permanent electronic records in electronic format as of December 31, 2019? (M-19-21, 1.1)

   X ☐ Yes
   ☐ No

   Please explain your response:

   All permanent electronic records, such as case decisions and press releases, are being retained in an electronic format. OSHRC does not “print to file” but instead maintains permanent electronic records in an electronic format.

3. 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)

   X ☐ Yes
   ☐ No

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

   Our agency is currently working with our NARA appraisal archivist to assist us in transitioning to a fully electronic format with appropriate metadata for all permanent records by the December 31, 2022 deadline.
4. Has your agency made progress towards managing all *temporary* records in electronic format? (M-19-21, 1.3)

☐ Yes
☐ No

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

As part of the transition to a fully electronic format for all permanent records, we are also working with our NARA appraisal archivist to assist us in transitioning all temporary records into an electronic format. The majority of our agency’s work product is the documentation involved with case adjudication, and such documents are currently being maintained electronically in our e-filing system.

5. Have you, as the SAORM, taken steps to ensure that your records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures? (M-19-21, 1.4)

☐ Yes
☐ No

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

Our agency’s records management program complies with the Federal Records Act and its regulations, as required by memorandum M-19-21, 1.4. The SAORM and Records Officer meet the requirements specified in the memorandum, all agency personnel are annually informed of their records management responsibilities through appropriate training, and records created or maintained by the agency are covered by NARA-approved records schedules. We are working on updating our records schedules as business practices transition to electronic workflows.

6. If applicable, have you identified all agency-operated records centers and made plans to either close them before 2022, or have you submitted a request to NARA for an exception? (M-19-21, 1.3)

☐ Yes
☐ No

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

Our agency does not operate record centers.

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

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

X ☐ Yes
☐ No

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

All incoming and outgoing senior officials have been briefed on their general records management responsibilities and have had training based on NARA videos. Senior officials’ email is retained and managed under a Capstone approach (GRS 6.1-0455-2017-0001). Senior officials know to contact the records officer if they have any questions.

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

X ☐ Yes
☐ No

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

We will need the cooperation of all agency offices to end their reliance on paper documents in favor of electronic recordkeeping. We will also reach out to other adjudicative agencies like ours to see what problems they have encountered with their transition to fully-electronic recordkeeping.

9. Do you need support from NARA to ensure a successful transition to fully-electronic recordkeeping?

X ☐ Yes
☐ No

Please provide details on what support is needed:

We would welcome support from NARA on the best practices for micro agencies like ours to successfully transition to fully-electronic recordkeeping.