



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: Katherine A. Tracy
- Position title: Counsel to Chair Cynthia L. Attwood
- Address: Occupational Safety and Health Review Commission
1120h 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 provide a list, and also indicate any that are new or have been changed due to reorganization or other circumstances.

Agency: Occupational Safety and Health Review Commission

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 COVID-19 pandemic initially forced the Washington Federal Records Center to close and then subsequently to reduce staffing. Due to the Center's closure and reduced staffing, it was unable to receive the shipment of records. Consequently, we have had to allocate additional safe storage space on our premises for boxes of records that would have otherwise been sent to the Center.

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.

As a micro agency with approximately 50 federal employees, the heads of the Commission offices that control records management, data management, and other agency information lines of business are readily in direct communication with each other and assist one another with managing and sharing information within the agency and with stakeholders.

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):

Our agency is 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.

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):

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 we maintain such documents electronically in our e-filing system.

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.

Currently, our agency does not have plans to submit to NARA a request for an exemption to the M-19-21 requirements before December 31, 2022.

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.

We are not utilizing GSA's service to procure solutions because our agency maintains the majority of our work product electronically in our e-filing system.

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.

Currently, we do not see the need to store temporary records in commercial storage facilities by December 31, 2022 because our temporary and permanent records will be in an electronic format.

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):

We will continue to require the cooperation of all agency offices to end their reliance on paper documents in favor of electronic recordkeeping. We will also continue to work with other adjudicative agencies like ours to see what challenges they have encountered or expect to encounter with their transition to fully electronic recordkeeping.

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):