



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: Richard Morgan
- Position title: Acting General Counsel
- Address: 800 North Capitol Street, NW, Washington DC 20002

1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately?

This report pertains to the Privacy and Civil Liberties Oversight Board (PCLOB).

2. Has the COVID-19 pandemic impacted policies or practices related to records management at your agency?

Yes

No

Do not know

Generally speaking, COVID-19 has impacted our records management practice, as telework has delayed our ability to process old physical files, in preparation for transfer to NARA as digital records.

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

Our information governance framework is articulated in our records management policy, and is reiterated in our umbrella IT policy.

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

Mandatory telework due to the COVID-19 pandemic, along with staff shortages associated with the Board being in a sub-quorum period for much of the year, has hindered our ability to transfer old physical records into digital form. However, we are maintaining all current records digitally.

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

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**

The PCLOB is a micro-agency with less than 40 staff. Furthermore, our agency has experienced significant staff turnover in the last year, to include the entirety of the Office of General Counsel. We having regained Board quorum, and are in the process of assessing our ability to comply with M-19-21.

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**

The PCLOB is a micro-agency with less than 40 staff. Furthermore, our agency has experienced significant staff turnover in the last year, to include the entirety of the Office of General Counsel.

We having regained Board quorum, and are in the process of assessing our Records Management program.

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

The PCLOB is a micro-agency with less than 40 staff, and thus does not require the use of commercial storage facilities.

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 see responses above.

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):