



Senior Agency Official for Records Management 2022 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 (OMB) and NARA issued a memorandum, *Transition to Electronic Records* ([M-19-21](#)), to ensure that all federal records are created, retained, and managed in electronic formats. M-19-21 gave agencies until the end of December 2022 to comply with several specific deadlines.

On December 23, 2022, OMB and NARA issued a new memorandum, *Update to Transition to Electronic Records* ([M-23-07](#)) reinforcing the goals in M-19-21 and extending the 2022 deadlines to June 30, 2024.

Additionally, 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 recordkeeping and preservation under these requirements, as well as other important records management initiatives.

The reporting period begins on January 9, 2023, and reports are due back to NARA no later than March 10, 2023.

NARA plans to post your 2022 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 on our website.

Instructions for Reporting:

- This template covers records management program developments, including those related to the transition to electronic recordkeeping as required by M-19-21 and M-23-07.
- 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 2022 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.

NARA may follow up with agencies to obtain additional information and/or documentation related to responses provided in the template.

As in previous years, we will be validating selected questions and responses from agencies. Your agency may be selected at random to provide additional documentation and/or take part in interviews to discuss your records management program activities.

Provide the following information (required):

- Name of SAORM: Andrew Proyect
- Position title: General Counsel
- Address: 800 N. 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. In response to the COVID-19 pandemic, have any of the temporary adaptations to agency business processes become permanent improvements to the management and preservation of electronic records?

- Yes
 No
 Not applicable, no adaptations were needed
 Do not know

Generally speaking, COVID-19 has not permanently impacted record keeping efforts; but has delayed our ability to process physical files and digital conversion efforts.

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3. **Has your agency taken action to meet the goal to manage, preserve and transfer all permanent records in an electronic format with appropriate metadata by June 30, 2024? (M-19-21, 1.2 and M-23-07, 1.1 and 1.2)**

- Yes
 No
 Do not know

PCLOB has sought to bring on a Records / Information Management detailee to assist with digitization efforts. PCLOB is also working to improve knowledge management to greater improve record keeping efforts moving forward, as well as efforts to train employees. Additional assessments have been made about feasibility of converting prior records. PCLOB implemented Microsoft 365 as our primary system to manage permanent electronic records in an electronic format.

4. **Has your agency taken action to meet the goal to manage and preserve all temporary records in an electronic format by June 30, 2024? (M-19-21, 1.3 and M-23-07, 1.3)**

- Yes
 No
 Do not know

See answer above.

5. **Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 to close agency-operated records storage facilities and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities by June 30, 2024?**

- Yes
 No
 Not applicable, all records are in electronic format
 Do not know

The PCLOB is a micro-agency with less than 40 staff, and our agency has experienced significant staff turnover in the last year. PCLOB is working diligently to meet the requirements of M-19-21 and M-23-07. While challenges exist, our goal is to meet the deadline or request an exception if necessary.

6. **Does your agency have policies and procedures that incorporate records management into the information governance (IG) framework for information, data, and other agency information management? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, Records Management (RM) Staff, Security, Privacy Officers, and FOIA)**

Note: The incorporation of records management into information governance is part of the framework covered by [OMB Federal Data Strategy - A Framework for Consistency \(M-19-18\)](#) as it provides a vision for managing and using federal data, along with recordkeeping requirements included in [OMB Circular A-130, Managing Information as a Strategic Resource](#).

- Yes
 No
 Do not know

Our information governance framework is articulated in our records management policy and is reiterated in our umbrella IT policy. However, the agency does not have an established governance framework connecting records management and data management. Due to the agency size, SAORM, ARO, RM Staff and FOIA Public Liaison roles are the same staff within OGC. OGC and OCIO work together on information governance issues.

7. Has your agency developed policies and procedures to ensure the capture and preservation of electronic messages, including when hardware or software is upgraded?

Note: Electronic messages means electronic mail and other electronic messaging systems that are used for purposes of communicating between individuals. Electronic messages that satisfy the definition of a federal record under the Federal Records Act are electronic records. This includes email, text messages, chat messages, voicemail, social media posts, and other similar applications. (See: [Email Management](#) and [CFR 1236: Electronic Records Management](#))

- Yes
 No
 Do not know

PCLOB currently captures and preserves email messages, but is working on means to capture other electronic messages such as text. Currently, social media posts are captured manually.

8. Is your agency using or exploring cognitive technologies to identify records and distinguish between temporary and permanent retention?

Note: Cognitive technologies generally describe automated technologies that can be applied to recordkeeping practices and procedures. These include Artificial Intelligence, Robotic Process Automation, Software Robot or Bot, and other machine learning technologies.

- Yes
 No
 Do not know

PCLOB is a micro-agency and does not have the capability at this time.

9. Do you as SAORM regularly oversee and evaluate the effectiveness of your records management program and its compliance with statutes and regulations?

Yes

No

Do not know

The SAORM and General Counsel are the same person. The OGC works to oversee, evaluate, and improve the effectiveness of the PCLOB records management program.

10. Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?

Yes

No

Do not know

Please explain your response and include any comments on existing, pending, and future topics.

11. Do you have any suggestions for how NARA can better engage with you and your program in your role as SAORM?

Yes

No

Do not know

Please explain your response and include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions.