



## ***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](mailto: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: Erica Barker
- Position title: Secretary & Chief Administrative Officer
- Address: 901 New York Ave., NW Suite 200 Washington, DC 20268

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

*Postal Regulatory Commission*

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

Yes

No

Do not know

**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

*The Commission does not have a formal information governance framework, rather, the records management and information technology teams operate under the same organizational umbrella, reporting to the same executive at the Commission. This ensures that our records management and data management staff regularly coordinate to ensure that electronic records are appropriately identified and formalized throughout the Commission.*

**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

*The Commission does not generate new records in paper format and all records are created and managed electronically. The Commission's manages most of its permanent records electronically in its docketing system. These records are generated and stored electronically and managed in accordance with the Commission's approved record schedule. Other records have some determination of their status and are manually aligned to approved records schedules. The Commission is in the approval phase of a new records management policy to be implemented in FY 2022 that will address proper management of permanent records in an electronic format.*

**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

*The Commission is in the approval phase of a new records management policy to be implemented in FY 2022 that will address proper management of temporary records in an electronic format.*

**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

*Although the Commission does not plan to apply for an exception at this time, the Commission is concerned about the potential requirement for automation, i.e., the requirement that the Commission procure an automated system for records management that exists beyond its Office 365 and records management program.*

*Due to the Commission's extremely small size and limited funding, it would not be appropriate for the Commission to procure an extensive system for records management that could instead be accomplished through policies applied to its O365 environment. The Commission is unclear whether the application of records management controls in O365 satisfies these requirements.*

**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 Commission does not have plans to procure ERM solutions. Due to its extremely small size and limited funding, it would not be appropriate or cost effective for the Commission to procure an extensive system for records management that could be accomplished through policies applied through its O365 environment and records management training.*

**8. Has your agency developed plans to meet the requirements of M-19-2, 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.*

*The Commission does not have an agency-operated records center.*

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

- Yes  
 No  
 Do not know

*Yes, there are many challenges facing the agency with respect to meeting NARA's goal for fully-electronic recordkeeping. The Commission is a small agency, with 74 FTEs in FY 2021, and the SAORM role is a collateral duty for the Commission's Secretary and Chief Administrative Officer. Moreover, the Commission only has one staff member dedicated to records management and a small administrative team that must complete all the work of the agency from finance (accounting, budgeting, appropriations), IT, human resources, privacy, records management, and operations. The Commission faces the same challenges that affect many similarly situated small agencies.*

*The Commission does not have a dedicated records management application and does not intend to procure one. However, the Commission is currently transitioning its system to Office 365 where it intends to accomplish all records management functions by creating governance rules for the tagging, scheduling, and retention of all internal records. The Commission is in the process of developing a new electronic docketing system and implementing updated policies including aligning temporary and permanent electronic records with approved records schedules.*

**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

*The ongoing support of NARA's appraisal archivist has been paramount to the Commission's successful records management program. The Commission leverages the training resources on the NARA website to provide annual mandatory RM training for all agency employees. The Commission's Records Management staff are working with NARA's Records Management Instruction Support (ReMIS) team to help establish a training package best suited for an agency of the Commission's size and limitations. This training is to be rolled out to Commission staff in FY 2022.*

*An area where NARA could be of service is in the area of training, specifically for senior executives in small agencies. As a very small agency, the Commission is extremely limited in resources, with its major limitation being the resource of time. Without a dedicated records management team, the Commission and other small agencies struggle to digest the numerous bulletins, guidance documents, and updates with respect to records management. Although NARA provides a host of resources available through its website, the amount of information available is often overwhelming and difficult to navigate for a small agency that may be still working on standing up a robust records management program. As an example, M-19-21 is a directive that is cited as setting forth the requirements for electronic management of records. However, in reviewing details from that directive and the current summary of the directive, it appears that additional requirements have been added over time that are not readily apparent from review of the original directive. In the future, a dedicated forum or webpage with resources aimed at small-agencies and high-level summary documents and requirements would be very much appreciated. We greatly appreciate NARA's dedication to assisting small agencies and have benefited from NARA's coordination and support.*