



Senior Agency Official for Records Management 2020 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. 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 19, 2021, and reports are due back to NARA no later than March 19, 2021.

NARA plans to post your 2020 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 both records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2022, 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 2020 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: Craig Keats
- Position title: General Counsel
- Address: 395 E. St SW, Washington DC. 20024

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.

Surface Transportation Board

2. Has the COVID-19 pandemic changed any 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):

Although we have not changed our approach, there are challenges completing the annual inventory, obtaining records stored at the NARA records center and transferring records to NARA.

3. Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)

- Yes
 No
 Do not know

Please provide details on what support is needed:

4. 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)

- Yes

- No
- Do not know

Please explain your response (include specific goals and example metrics):
Currently most STB permanent records are created and managed in electronic format with the appropriate metadata. Most STB permanent paper records were converted to electronic format with the appropriate metadata during 2019. The STB converted additional permanent paper records, including older records, to electronic format in 2020.

5. Has your agency made progress towards managing 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 and example metrics):

STB temporary records are created and managed in electronic format.

6. Is your agency investing resources in IT to support the transition to electronic recordkeeping?

- Yes
- No
- Do not know

Please explain your response. If Yes: Please include specific examples of resources and how this will support records management processes. If No or Do not know: Please explain.

STB performed a full assessment of the records management program with a RM contractor during 2020.

The STB is working on the implementation of an electronic records management solution with the IT department.

The STB is also considering how best to modernize its email management policy, including options such as the CAPSTONE approach.

7. To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)

- Yes

No

Do not know

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

N/A - STB does not have records centers.

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

**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.*

Yes

No

Do not know

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

The STB has procedures that include documentation to ensure that the records – including electronic records and email – of all employees, including Senior Officials, are properly captured and/or processed, and that they are not improperly removed, altered, or deleted. The procedures are included in Surface Transportation Board Access Control Policy effective December 18, 2018. Section 6.2 Account Management (AC-2) (Priority 1), which is excerpted below.

6.2 ACCOUNT MANAGEMENT (AC-2) (PRIORITY 1)

The STB:

A. Identifies and selects the following types of information system accounts to support organizational missions/business functions: individual and service.

B. Assigns account managers for information system accounts.

C. Establishes conditions for group and role membership.

D. Specifies authorized users of the information system, group and role membership, and access authorizations (i.e., privileges) and other attributes (as required) for each account.

E. Requires approvals by CIO for requests to create information system accounts.

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STB Access Control Policy

F. Creates, enables, modifies, disables, and removes information system accounts in accordance with account management procedure.

G. Monitors the use of information system accounts.

H. Notifies account managers:

1. When accounts are no longer required;
2. When users are terminated or transferred; and
3. When individual information system usage or need-to-know changes.

I. Authorizes access to the information system based on:

1. A valid access authorization;
2. Intended system usage; and
3. Other attributes as required by the organization or associated missions/business functions.

J. Reviews accounts for compliance with account management requirements at least annually.
and

K. Establishes a process for reissuing shared/group account credentials (if deployed) when individuals are removed from the group.

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):

Some of the challenges that the STB faces are:

- *The allocation of financial resources for the purchase and implementation of an electronic records management solution.*
- *Decades of permanent records that were created in paper format. These records were not required to be transferred to NARA until after 20-30 years and now need to be transferred to NARA before the end of 2022. Although the records are now mostly digitized, transfer to NARA is a significant undertaking for a small agency.*
- *The development and implementation of a modernized email management solution that will facilitate the management of email records.*
- *The challenges presented during the COVID-19 pandemic with regard to [better yet: regarding] records transfer and the limited amount of time left to complete the requirement before the deadline established in M-19-21.*

10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?

- Yes
 No
 Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):

The STB appreciate the assistance that NARA personnel provides on a regular basis.