

## 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.

Senior Agency Official for Records Management Report - 2022

## 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 rmselfassessment@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:	Earlene Seske	٦r

• Position title: Director of Office of Administration

• Address: 1331 F. St NW, Suite 1000, Washington, DC 20004

• Office telephone number: 202-272-0022

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 indicate any that are new or have been changed due to reorganization or other circumstances.

The United States Architectural Barriers and Compliance Board (U.S. Access Board)

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

Please explain your response. (If Yes, include details of the changes and why they became permanent. If No, or Do not know, please explain your answer.)

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

Please explain your response with specific actions taken, challenges and results

**Electronic record policies** are documented in the agency Records Management Program Directive and in the Records Management Handbook. Descriptions of record material and guidance for storing electronic records are outlined in our internal Records Management Handbook. Our file plan includes guidance for electronic records which is shared with staff and staff receive regular training and updates.

We have a designated architecture for storing and applying metadata to our permanent electronic records using a file structure and subject area metadata tags within our SharePoint Libraries. The SharePoint Electronic Records Management System (ERMS) mirrors the SharePoint Libraries and then captures and stores the records into their assigned record retention schedule.

**ERMS Metadata:** The records management team has tested the ERMS to ensure that the permanent records metadata tags are sync'd to their appropriate record category/series and dispositioned accordingly. The SharePoint ERMS preserves the records by using the metadata, Robotic Process Automation (RPA) and BOTS to categorize the records into their appropriate records schedule retention schedule.

**Specific goals** were to ensure ease of use for the end users. End users upload the file and assign the appropriate metadata tag. The records management process (Robotic Process Automation (RPA) and BOT are aligned to agency records schedules) is built into the ERMS.

**Metrics:** The U.S. Access Board has migrated 100% of its permanent records and plans to go live with the SharePoint ERMS solution by the end of the 2023 calendar year. The permanent records preserved in the ERMS meet the minimum metadata requirements as outlined in NARA Bulletin 2015-04 "Metadata Guidance for the Transfer of Permanent Electronic Records."

Access and retrievability of electronic records: The records within the ERMA (including those of current and separated employees) are searchable, retrievable, and usable throughout their lifecycle. The structure of our files on the SharePoint site reflects our agency's business

functions. Our intuitive hierarchy ensures that we can easily retrieve permanent records relating to a specific subject. Our filing conventions were established in collaboration with our General Counsel to ensure ease of use and compliance with potential FOIA requests.

The challenges are to keep the metadata simplified by keeping the number of levels (clicks for staff) down to a minimum. Additionally, any changes to the metadata must be incorporated into the SharePoint ERMS.

4.	Has your agency taken action to meet the goal to manage and preserve all <u>temporary</u> records in an electronic format by June 30, 2024? (M-19-21, 1.3 and M-23-07, 1.3)
	□ Yes □ No

Please explain your response with specific actions taken, challenges and results.

☐ Do not know

**Electronic Process**: We have a dual process in place – using the same architecture for storing and applying metadata to temporary electronic records as we do for the permanent records as described above in question 3.

**Specific goals** were to ensure ease of use for the end users. End users upload the file and assign the appropriate metadata tag. The records management process (Robotic Process Automation (RPA) and BOT are aligned to agency records schedules) is built into the ERMS.

**Metrics:** The U.S. Access Board has migrated 75% of its temporary records into the RMA solution. The metadata associated with these records meet the minimum metadata requirements as outlined in NARA Bulletin 2015-04 "Metadata Guidance for the Transfer of Permanent Electronic Records."

The challenges are to keep the metadata simplified by keeping the number of levels (clicks for staff) down to a minimum. Additionally, any changes to the metadata must be incorporated into the SharePoint ERMS.

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?

<mark>] Yes</mark>
] No
Not applicable, all records are in electronic format
Do not know

Please explain your response with specific actions taken, challenges and results.

The U.S. Access Boards does not have agency-operated records storage facility. All agency records are transferred to NARA directly. As of December 2022, the U.S. Access Board has 45 cubic feet of records that have been approved for transfer to NARA.

This question is not applicable to the U.S. Access Board – we do not use external operating records storage facilities. Permanent records are transferred directly to NARA.

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.

□ Ye	S
□ No	
□ Do	not know

Please explain your response and provide details about how your agency's policies enhance IG and RM's role or relationship to it.

The U.S. Access Board has not established a formal information governance framework. Currently the CIO, CDO, SAORM, DRO/ARC and RM staff are organized under the Office of Administration. Being a small micro-agency the individuals who are responsible for these activities within the agency work together to ensure the agency lines of business are included in all information systems and their associated workflows.

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 il, social *1236*:

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electronic records. This includes email, text messages, chat messages, voicemai
media posts, and other similar applications. (See: <u>Email Management</u> and <u>CFR</u>
Electronic Records Management)
<mark>□ Yes</mark>
□ No

	□ Do not know
	Please explain your response and include details of your agency's methods to capture and preserve electronic messaging records or challenges preventing you from doing so.
	The U.S. Access Board has an agency Email Schedule (DAA-0588-2016-0001) in place to preserve email records. The U.S. Access Board is planning on using traditional records management (i.e., retention based on content), utilizing multiple NARA-approved disposition authorities for other forms of communication such as text/chat messages, etc.
	The challenges here are designing, testing and implementing an email system that will ensure ease of use for the end users and meet budgeting constraints.
3.	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
	Please explain your response. (If Yes, include details on both methods and tools being explored, the level of accuracy and how that level is determined.)
	The SharePoint ERMS preserves the records by using the metadata, and Robotic Process Automation (RPA) and BOTS to categorize the records into their appropriate records schedule disposition authority. The challenges are to keep the metadata simplified by keeping the number of levels (clicks for staff) down to a minimum. Additionally, any changes to the metadata must be incorporated into the SharePoint ERMS.
€.	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
	Please explain your response including what specific measures you have incorporated into the SAORM role.
	e SAORM is the Director, Office of Administration. Records management reporting activities aining, annual reporting, etc.) are run through the Director's office.

informal. The Agency Records Officer (ARO) provides weekly reports regarding the status of the U.S. Access Board records management program. 10. Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?  $\square$  Yes  $\square$  No ☐ Do not know Please explain your response and include any comments on existing, pending, and future topics. NARA needs to continue to keep in mind the challenges micro-agency's face as the transition to electronic records continues to move forward. Specifically funding and staff resources necessary to maintain a compliant records management program. 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.

The U.S Access Board believes our current level of engagement to be sufficient.

The U.S. Access Board is a small agency with 24 FTE's specific oversight measures are