

*Senior Agency Official for Records Management – Office of the Comptroller of the Currency
(OCC)
2017 Annual Report*

Provide the following information (required):

- Name of SAORM: **Stephen Warren**
- Position title: **Chief Information Officer**
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1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAO?**

OCC

2. **Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)**

- Yes
 No

Please explain your response:

There is an ERK initiative underway to meet the 2019 deadline. We are working with business units that create and maintain permanent records to ensure that records are managed in approved electronic recordkeeping systems.

3. **Has your agency developed plans or taken actions to evaluate and implement the digitization of permanent records created in hard copy or other analog formats (e.g., microfiche, microfilm, analog video, analog audio)? (M-12-18 Goal 1.1)**

- Yes
 No

Please explain your response and include any obstacles you are facing in planning or implementing digitization initiatives.

The OCC does not plan to digitize (and profile with metadata) legacy paper records or microfiche records that are already accessioned due to the large volume of permanent hardcopy records and microfiche. The OCC is taking a day-forward approach. As business units undergo the ERK certification process, they are strongly encouraged to undergo the certification process to digitize hardcopy records. The OCC has implemented procedures for certain business units and continues to assess options for digitizing paper records that are on-site.

4. **OMB M-17-22 required agencies to create reform plans that may result in re-organizations and the elimination of offices and/or functions. Where necessary, has your agency taken steps to ensure that recordkeeping requirements and other records management needs have been or will be accounted for and implemented when making these changes?**

- Yes
 No

Please explain your response:

Business units notify Records Management of organizational changes throughout the year and reorganizations are also addressed during the annual file plan review.

5. **Have you, as the SAORM, taken steps to ensure that your records management program has the strategic direction, support and resources it needs to be successful?** (See: NARA Bulletin 2017-02: Guidance on Senior Agency Officials for Records Management <https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html>)

- Yes
 No

Please explain your response

The records management team was reorganized directly under the Office of the CIO, who is the SAORM, and is actively involved in records management strategy initiatives.

6. **Have you, as the SAORM, ensured that all incoming and outgoing senior officials* receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements.**

*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

Please explain your response:

The records management team has briefed incoming and outgoing senior officials. In addition, the records management team is updating our policies, procedures and training materials to ensure that there is a standardized protocol for onboarding and off-boarding of senior officials regarding records management responsibilities.

7. **Is the records management program and related requirements included in your agency's Information Resource Management Plan or an equivalent information management plan? ([OMB Circular A-130, Managing Information as a Strategic Resource](#))?**

- Yes
 No

Please explain your response:

The records management function was moved under the CIO after the FY18 IRM was established. Records requirements will be included as part of FY19 IRM planning development.

8. **What policies, guidance or support do you need from NARA to ensure a successful transition to fully electronic recordkeeping? (NARA Strategic Plan. Goal 2.4)**

Update best practices regarding how other agencies are meeting the deadlines in M-12-18. Keep working towards standard electronic recordkeeping solutions government-wide.