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

- to identify best practices and model solutions within federal agencies

On December 23, 2022, OMB and NARA issued a memorandum, *Update to Transition to Electronic Records* ([M-23-07](#)) that reinforced the goals in [M-19-21](#) and extended the 2022 deadlines to June 30, 2024. It is critical that Federal agencies move beyond paper-based processes and embrace the opportunities afforded to improve Government by transitioning fully to an electronic environment.

This year's SAORM report provides an opportunity for agencies to report on their progress towards electronic recordkeeping under these requirements, as well as other important records management initiatives.

The reporting period begins on January 13, 2025, and reports are due back to NARA no later than March 14, 2025.

NARA will post your 2024 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 rmselfassessment@nara.gov. Include the words "2024 SAORM 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.

Please provide the following information (required):

- Name of SAORM: <u>Kristen Baldwin</u>

- Position title: <u>Chief Information Officer</u>

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.

   Office of the Comptroller of the Currency

2. **Did your agency meet the goal to manage all <u>permanent</u> records in an electronic format to the fullest extent possible for eventual transfer and accessioning by June 30, 2024? (M-19-21, 1.2 and M-23-07, and 1.1)**

   X☐ Yes
   ☐ No
   ☐ Not applicable, all records were already in electronic format

If No, why not? (Include if you already submitted, or will still be submitting an exception request and/or details of specific challenges your agency had in meeting the goal.)

3. **Did your agency 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)**

   X☐ Yes
   ☐ No
   ☐ Not applicable, all records were already in electronic format

   If No, why not? (Include if you already submitted, or will still be submitting an exception request and/or details of specific challenges your agency had in meeting the goal.)

4. **Did your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 to close agency-operated records storage facilities by June 30, 2024? (Choose all that apply)**

   ☐ Yes
   ☐ No
   X☐ Not applicable, my agency did not have agency-operated records storage facilities
   ☐ Not applicable, all records were already in electronic format

   If No, why not? (Include if you already submitted, or will still be submitting an exception request and/or details of specific challenges your agency had in meeting the goal.)

5. **Did your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 to transfer inactive, temporary analog records to NARA Federal Records Centers (FRC) or commercial storage facilities by June 30, 2024? (Choose all that apply)**

   X☐ Yes, we transferred the records to the FRC
   ☐ Yes, we transferred the records to commercial storage facilities
   ☐ No
   ☐ Not applicable, all records were already in electronic format

   If No, why not? (Include if you already submitted, or will still be submitting an exception request and/or details of specific challenges your agency had in meeting the goal.)

6. **Are you supporting the implementation and closure of any corrective actions that resulted from a finding and recommendation documented in a NARA inspection or assessment of your agency's RM program?**

   ☐ Yes

☐ No

X☐ Not applicable, my agency is not under a plan of corrective action

If Yes, please explain how you are supporting the implementation and closure of the corrective actions. If No, why not?

7. **Are you advocating for the agency's records management program and ensuring that it documents the organization's activities and decisions by participating in meetings and working groups dedicated to improving records management in your agency?**

X☐ Yes
☐ No

If Yes, please explain how. If No, why not?

As the OCC CIO, I also hold titles as Senior Agency Official for Records Management (SAORM), Chief Data Officer (CDO), and Senior Agency Official for Privacy (SAOP). The Records and Information Management Program Office is located under my direction in the Office of IT Services (ITS).

I meet regularly with the ARO regarding ongoing initiatives in records management, strategic planning, identification and resolution of issues and roadblocks, and the alignment of records management objectives with broader information technology strategies.

I participate in meetings and working groups, both internal to OCC and the Federal Government, that help improve records management within the OCC. Examples include my coordination with other FFIEC CIOs, collaborating on records practices and challenges among agencies with similar missions to OCC. ITS participates in activities related to a multi-year effort designed to provide a modernized platform for born digital records of supervisory activities, and an inter-agency workgroup dedicated to improving data retention strategies and governance.

Further, I am overseeing the implementation of a new agency system to modernize our current enterprise recordkeeping system, with the active participation of the RIM Program Office.

8. **Are you ensuring the agency protects records against unauthorized disposition (e.g., destruction, deletion, alteration, removal, or loss) as defined in NARA regulations and guidance?**

X☐ Yes
☐ No

If Yes, please explain how. If No, why not?

The Records and Information Management Program Office is located under my direction in the Office of IT Services (ITS). I approve all records management policies and procedures and ensure that the Records and Information Management Program Office executes the records management program requirements in conjunction with other agency IT functions. These include both agency policies and procedures that provide guidance on disposition and information protection measures. These actions include:

- File Plans: File plans are updated annually and the RIM team provides training annually to all staff as well as to all new hires which also covers unauthorized disposition. The annual file plan process is considered an auditable process which is tracked and monitored as part of the agency's Quality Management Program.

- Electronic Recordkeeping Systems: Records are required to be maintained in agency approved electronic recordkeeping systems which provide key controls (i.e. access controls, audit trails, monitoring and backup and recovery etc.) as per NARA guidance. I review and approve all electronic recordkeeping system certifications.

    The OCC is in the process of modernizing its enterprise recordkeeping system, a multi-year procurement and implementation effort undertaken with my full support and oversight.

- Data Security and Privacy Controls: The OCC also protects agency records against unauthorized loss by implementing for its information systems pertinent security and privacy controls commensurate with data sensitivity categorization. Access is granted only to authorized personnel with a legitimate need to access the information displayed, processed, stored, or transmitted by OCC information systems. These controls include proper system backups and recovery procedures, employee training on safeguarding non-public information, and Data Loss Prevention (DLP) processes to protect Personally Identifiable Information (PII) and other forms of non-public OCC information.

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

    ☐ Yes
    X☐ No

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

None at this time.