



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: Trevor Norris (Acting SAORM)
- Position title: Acting Assistant Secretary for Management
- Address: 1500 Pennsylvania Ave. Washington, D.C. 20005

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 list: Bureaus covered by this report: Departmental Offices (DO), Treasury Inspector General for Tax Administration (TIGTA), Special Inspector General for the Troubled Asset Relief Program (SIGTARP), Office of the Inspector General (OIG), Community Development Financial Institutions Fund (CDFI), and Financial Crimes Enforcement Network (FinCEN).

Bureaus which will be reporting separately: Office of the Comptroller of the Currency (OCC), Bureau of the Fiscal Service (BFS), Internal Revenue Service (IRS), U.S. Mint, Bureau of Engraving and Printing (BEP), and Alcohol and Tobacco Tax and Trade Bureau (TTB).

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

- Yes
 No
 Do not know

Treasury's records management policies and practices have remained the same throughout the pandemic.

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:

Treasury has an established a Data Governance Board that serves as a vital link among Treasury-wide management functions and provides coordinated leadership, direction, and guidance on

matters related to the gathering, analysis, sharing, use, and dissemination of data and information. The Board's members include Treasury's Chief Data Officer, the Deputy Chief Financial Officer, the Chief Information Officer, the Deputy Assistant Secretary for Privacy, Transparency, and Records¹, the Chief Evaluation Officer and Deputy Performance Improvement Officer, and the Chief Statistical Official.

In addition to the Data Governance Board, the Office of Privacy, Transparency, and Records works closely with the Office of the Chief Information Officer and Treasury program offices in the development and implementation of Treasury systems, records retention policies, as well as policies, procedures, and processes for new and modified information systems.

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):

Treasury has begun to manage all permanent records electronically; however, Records Control Schedules need to be updated before Treasury can begin to accession inactive permanent electronic records to the National Archives.

SIGTARP took steps to align with NARA's criteria and requirements, including: (1) creating office file plans, (2) revising SIGTARP's records schedule, (3) meeting with stakeholders from various components to discuss issues related to electronic records management issues (for example, providing recommendations for how to pair files which were previously maintained in both hard copy, in part, and electronic copy, in part, to form a cohesive file), and (4) transferring all paper files that have reached its disposition.

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):

¹ The Deputy Assistant Secretary for Privacy, Transparency, and Records provides general oversight and supervision of Treasury's FOIA, privacy, and records management programs.

Treasury has made progress towards this goal by utilizing existing technology and tools to create, capture, and maintain electronic records with appropriate metadata. Currently, bureaus either utilize technology which creates appropriate metadata for records or are in the process of procuring technology for this goal.

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.

Treasury DO plans to invest resources in IT to support the transition to electronic recordkeeping; however, this is ongoing project and in development. Resources in IT align with the agency's mission, strategic initiatives and regulatory requirements, knowing that records are a significant asset and an electronic recordkeeping can and should be an important part of the agency's business continuity, contingency, and disaster recovery plan. Records management is an important consideration during the procurement and implementation of new and modified systems.

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):

Treasury DO and the other bureaus listed in this report do not plan to use commercial storage facilities and will utilize NARA Federal Records Centers, as well as plan to transfer and accession non-electronic records before the December 31, 2022 deadline.

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):

Treasury evaluates employee email record retentions when an employee joins, and later departs the agency. Capstone designations are evaluated regularly. Employees and Senior Officials are provided records management training materials during their onboarding and receive regular records management reminders in employee newsletters. When Senior Leaders and Capstone Officials depart the agency, they are debriefed by a records management employee and reminded of their records management responsibilities. Departing employees are required to complete a removal of information form and confirm that they are not removing any records materials.

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):

At the Department of the Treasury, bureaus have reported challenges meeting this goal. Treasury does not currently have sufficient resources to implement fully electronic recordkeeping. Bureaus face significant challenges updating legacy electronic records systems to meet the requirements of M-19-21. Bureaus report that securing dedicated funding for new information technology to support recordkeeping requirements is an ongoing challenge.

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):

Treasury recommends that NARA hold regular (virtual) meetings with agency SAORMs and/or one on one meetings with agency SAORMs and Records Officers to discuss best practices and to brainstorm solutions to challenges in implementing electronic recordkeeping requirements. NARA should also consider publishing samples of guidance that agencies could provide to employees, contractors, senior executives, and appointees as part of an overall effort to transition to electronic recordkeeping.