



Senior Agency Official for Records Management 2021 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. 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 records keeping and preservation under both these requirements, as well as other important records management initiatives.

The reporting period begins on January 10, 2022, and reports are due back to NARA no later than March 11, 2022.

NARA plans to post your 2021 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 records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2021, 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 2021 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?

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), Special Inspector General for Pandemic Recovery (SIGPR), Office of the Inspector General (OIG), Community Development Financial Institutions Fund (CDFI), and Bureau of Engraving and Printing (BEP).

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, , and Alcohol and Tobacco Tax and Trade Bureau (TTB), and Financial Crimes Enforcement Network (FinCEN).

2. Has the COVID-19 pandemic impacted 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):

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

TIGTA employees are working in a digital environment. Records are being saved to an approved recordkeeping system.

3. Does your agency have an established information governance framework that integrates records management, data management, and other agency information lines of business? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff, Security, Privacy Officers, and FOIA)

X Yes

- No
- Do not know

Please provide details. If 'Yes,' provide details on how your RM program is integrated into this framework. If 'No' or 'Do not know,' please explain your response.

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.

Currently, TIGTA maintains official records in SharePoint On-Premises; however, TIGTA is in the process of determining the appropriate information governance framework and guidance to transition records to Office 365 or SharePoint Online.

The small size of SIGTARP allows for relationships between the listed areas, and each division has RM liaisons.

4. Will your agency meet the goal to manage and preserve 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, example metrics, and/or challenges):

Treasury has begun to manage all permanent records electronically. In collaboration with Treasury DO OCIO, we have launched a solution for permanent electronic record managements system: OneCT. OneCT is a case management system that allows senior management to sign and approve various documents such as reports, memoranda, and important policy decisions. This system is acting as Treasury DO's permanent records repository for many program offices. This system meets metadata requirements that make records easily retrievable and transferable to the National Archives once retentions dates are met. However, Records Control Schedules need to be updated before Treasury can begin to accession inactive permanent electronic records to the National Archives. For hardcopy permanent records that will need to be digitized, Treasury is awaiting a final regulation from NARA to include in our records management policy.

Treasury DO also has an approved NARA Form 1005, and ensures that all Capstone Officials within DO have permanent retentions enabled for their email accounts. We are reviewing and updating DO's Capstone Officials list to resubmit to NARA to ensure all newly established offices are included.

All TIGTA's permanent records are electronic and are expected to have the appropriate metadata by December 31, 2022.

5. Will your agency meet the goal to manage and preserve 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, example metrics, and/or challenges):

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. However, Records Control Schedules need to be updated to reflect current active temporary records as well as media neutrality before Treasury can begin to dispose of temporary records that meet retention requirements. Treasury DO is currently working with program offices to inventory their permanent and temporary records and begin the process of revising/updating Record Control Schedules.

All TIGTA functions are moving towards creating all temporary records in electronic format. The bureau's intention is to pre-accession all temporary paper records to the Federal Records Center (FRC) before December 31, 2022.

6. Does your agency have plans to submit to NARA a request for an exception to the M-19-21 requirements before December 31, 2022?

- Yes
 No
 Do not know

Please explain your response. If 'Yes,' please include an estimate of when you plan to submit an exception and any relevant details. If 'No' or 'Do not know,' please explain your response.

Treasury DO will not submit an exception to the requirements of OMB M-19-21, however we may request an extension as we are not poised to meet the requirement deadlines of December 31, 2022.

The TIGTA Records Officer will continue to work with bureau functions to ensure record processes are created for electronic records. Records retention schedules will be submitted to indicate media neutral, and there will be no further approval to create hardcopy records.

7. Is your agency utilizing the General Services Administration's Special Item Number for Electronic Records Management ([518210 ERM](#)) 6 to procure solutions to assist in transitioning to an Electronic Environment?

- Yes
 No
 Do not know

Please explain your response. If 'Yes,' please include specific examples and how this will support records management processes. If 'No' or 'Do not know,' please explain.

Treasury Departmental Offices is not currently utilizing the GSA's Special Item number for Electronic Records Management. The majority of DO utilizes Sharepoint or Sharepoint based platforms as records repositories, which have records management and retention capabilities built in the systems.

8. Has your agency developed plans to meet the requirements of M-19-21, 1.3 to store temporary records in commercial storage facilities by December 31, 2022?*

- Yes
 No
 Do not know

**M-19-21, 1.3 includes closing of agency-operated storage facilities and no new transfers of paper records to the Federal Records Centers.*

Please explain your response. If 'Yes,' provide details about the use of commercial storage and other changes related to storage. If 'No' or 'Do not know,' please explain.

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. Treasury also plans to transfer non-electronic records before the December 31, 2022 deadline, pending available resources and the reopening of the FRCs.

TIGTA's inactive records are being sent to the FRCs for storage versus using a commercial storage vendor. Plans are being made to inventory all hardcopy records and prepare to move them ahead of the December 31, 2022, deadline.

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. NARA is always working on ways we can make your role as the SAORM easier, improve how we interact with you and how you interact with each other. Do you have any suggestions?

- 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.