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 13, 2020**, with reports due back to NARA no later than **March 13, 2020**.

NARA plans to post your 2019 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, 2019.
- 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 2019 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**: Charles (Rusty) Baumgardner (acting)
- **Position title**: CIO Programs Office Director
- **Address**: Office of the Comptroller of the Currency

400 7th St., SW
Suite 3E-219
Washington, DC 20219

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.**

   *Please provide list: OCC*

2. **Is your agency managing all permanent electronic records in electronic format as of December 31, 2019? (M-19-21, 1.1)**

   - [ ] Yes
   - [ ] No

   *Please explain your response:*
   
   Please note - There were a few files that were not moved into ERK until 2nd Q FY2020 due to transfer software issues. Those are resolved and were manually moved to the ERK.

3. **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

   *Please explain your response (include specific goals and example metrics):*
   
   All permanent electronic records now maintained with metadata in ERK. We are actively pursuing digitization of our Corporate History Files that have many years of paper history. We also need to determine if electronic solution is legally feasible for some paper records that legally require seals or notarization.
4. Has your agency made progress towards managing all temporary records in electronic format? (M-19-21, 1.3)

☐ Yes  ☐ No

Please explain your response (include specific goals and example metrics):
The majority of all agency business is conducted in electronic format. We are continuing to review and pursue resolution for the remaining paper-based processes. The seals/notarization is also an issue for some temporary records.

5. Have you, as the SAORM, taken steps to ensure that your records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures? (M-19-21, 1.4)

☐ Yes  ☐ No

Please explain your response (include specific goals and example metrics):
The RIM Program Office reports directly to the CIO Programs Office for oversight and compliance.

Specific annual goals include:
In FY19 and FY20, we have specific measurable goals for Reduction of Paper Records and to ensure all existing paper records are moved to FRC for storage in preparation for the 2022 deadline. Annually we conduct annual RIM training mandatory for all employees. Annually we review and update File Plans for all agency offices. Further we met the M-19-21 goal for managing all permanent electronic records to be stored in ERK.

6. If applicable, have you identified all agency-operated records centers and made plans to either close them before 2022, or have you submitted a request to NARA for an exception? (M-19-21, 1.3)

☐ Yes  ☐ No

Please explain your response (include specific goals and example metrics):
Our onsite Records file room has been cleared and items shipped to FRC. Only remaining items are new incoming items, records that have been recalled, and temporary paper records that are currently being scanned inhouse.
7. **Does your agency have procedures that include documentation to ensure records of 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

*Please explain your response (include specific details of procedures):*  
OCC has implemented the Capstone Approach for managing emails. Other senior officials’ permanent electronic records are maintained in an ERK with proper metadata and retention applied.

8. **Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?**

☐ Yes  
☐ No

*Please explain your response (include details of specific challenges, if applicable):*  
We have challenges for items that legally require seals/notarizations.

9. **Do you need support from NARA to ensure a successful transition to fully-electronic recordkeeping?**

☐ Yes  
☐ No

*Please provide details on what support is needed:*  
OCC suggests that NARA support a government-wide ERK shared solution and automation technology.