



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: Kurt DelBene
- Position title: Assistant Secretary for Information and Technology, Chief Information Officer
- Address: 810 Vermont Ave. NW; Washington, DC 20420

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 also indicate any that are new or have been changed due to reorganization or other circumstances.

VA Central Offices and three Administrations (see list below).

Veterans Health Administration (VHA)

Veterans Benefits Administration (VBA)

National Cemetery Administration (NCA)

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):

During the pandemic only emergency records requests were taken by NARA; as a result, there was a significant backlog. We are also experienced delays accessing records from commercial facilities.

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)

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.

VA does have a data governance framework. The Principal Deputy Assistant Secretary for Information and Technology, Deputy Chief Information Officer (DCIO), is a member of the VA Data Governance Council, which is chaired by the Chief Data Officer. The Chief Information Security Officer and the Chief Finance Officer are also members. As a key committee member, the DCIO works to plan and implement agency-wide data governance activities and ensure records and cybersecurity are integrated.

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):

VA maintains all email records in its electronic record keeping system (O365) using the CAPSTONE approach.

As of 2014, we began managing our permanent records in electronic format. VA will continue to maintain some records in analog format due to cost, space and litigation holds.

Due to the volume of Veteran compensation-related records affected by the Robinson v. McDonald decision, there are programmatic budgetary, legal, and administrative considerations involved with implementing a 100% paperless environment. This decision forbids destruction of any compensation-related file until such time the VA Secretary has shown VA's capability to replicate, with 100% accuracy, Veteran claims files.

Our Administrations are focusing on efforts to digitize over 35 different types of permanent records as a primary priority and then storing them in NARA Federal Records Centers with a due date of no later than December 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):

VA is unable to digitize all temporary records due to cost, space and litigation holds. In May 2021, the Department of Veterans Affairs (VA)s submitted a waiver to maintain our analog (paper) records. Given the size of our agency (as the second largest Federal agency) and unique population that we serve, hundreds of record series, customer-based and unique mission, we discovered that there are significant cost and risks involved in digitizing every single permanent and temporary analog record.

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.

In May 2021, the Department of Veterans Affairs (VA)s submitted a waiver to maintain our analog paper 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.

VA has not utilized the GSA Special Item Number for electronic records management to procure related solutions. It would be costly to plan/implement an electronic record keeping system to electronically manage all records across the enterprise.

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.

VA's long term storage facilities are mostly commercial, with expectation of the VA Records Center and Vault (RCV). Note that VA requested an extension (minimum of 25-years) for moving millions of records from our agency-operated Records Center and Vault (RCV) to commercial sites; VA requests consideration to continue to maintain and transfer paper records to the FRCs.

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):

VA does not currently have an enterprise electronic record keeping system to manage its records. VA is the second largest cabinet-level agency It would be costly to plan/implement an electronic record keeping system to electronically manage all records across the enterprise.

VA serves a specific and diverse customer base: our nation's Veterans and next-of-kin. VA manages millions of medical and benefit case files and business processes that are supported by 600+ IT and hundreds of record types/categories.

Given the paper-intensive nature of business operations and activities, digitizing millions and millions of analog records is costly, labor extensive and an administrative risk (capability to replicate, with 100% accuracy).

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):

NARA could improve how they explain their regulations and policies regarding the waiver process for transferring records to the Federal Records Centers. What are the parameters and metrics on how a federal agency is granted a waiver for transferring records to Federal Records Centers? NARA could also give clear, detailed guidance on transitioning to an enterprise

electronic record keeping tool. Take time to learn about your agencies structures and environment to determine needs and identify challenges. Collaborate with agencies on draft mandates and decisions regarding records management.