

NARA Bulletin 2017-XX

Draft Version: August 8, 2017

TO: Heads of Executive Departments and Federal Agencies

SUBJECT: Guidance on Senior Agency Officials for Records Management

EXPIRATION DATE: Expires when revoked or superseded

1. What is the purpose of this Bulletin?

This Bulletin clarifies the roles and responsibilities of the Senior Agency Official for Records Management (SAORM). This Bulletin also outlines how Departments and agencies designate their SAORMs and agency Records Officers (ROs).

This Bulletin supersedes the [Frequently Asked Questions about Senior Agency Officials \(SAOs\) Appointments](#).

2. What is the role of the SAORM?

The SAORM is a senior official who has direct responsibility for ensuring the agency efficiently and appropriately complies with all applicable records management statutes, regulations, NARA policy, and OMB policy. The SAORM bridges the gap between the agency head and the agency RO in order to provide strategic direction for the agency's records management program.

The SAORM promotes information governance at a senior level by seeing across program offices and the deployment of individual IT systems. The SAORM advocates for records management as an integral component of information governance, ensuring adequate resources are embedded into the agency's [Strategic Information Resources Management \(IRM\) Plan](#). The SAORM must work directly with the RO and other appropriate officials to oversee the implementation of the agency's records management program.

Information governance may include related disciplines such as information security, risk management, data management, and knowledge management. Information governance also may include programs related to discovery, privacy, and the Freedom of Information Act (FOIA). As information governance frameworks develop and mature, the SAORM should integrate the records management program within the framework.

3. How was the SAORM position established?

The 2011 [Presidential Memorandum on Managing Government Records](#) required agencies to name a senior agency official for records management. In 2012, the Office of Management and Budget (OMB) and NARA jointly issued the [Managing Government Records Directive \(M-12-18\)](#) describing additional duties and responsibilities of the SAORM. The requirement to have a SAORM was reiterated, and further described, in the revised [OMB Circular A-130](#) published on July 27, 2016.

4. What are the responsibilities of the SAORM?

The SAORM's overall responsibilities include:

- Setting the vision and strategic direction for the agency records management program, including incorporating these goals into the agency's Strategic IRM Plan;
- Instituting records management programs that provide documentation of agency activities;
- Overseeing the issuance of internal agency policies establishing program objectives, responsibilities, and authorities for the creation, maintenance, and disposition of agency records;
- Ensuring the ability to access, retrieve, and manage records throughout their life cycle regardless of format or medium;
- Ensuring the Department or agency protects records against unauthorized removal or loss and ensures all agency staff are informed of their records management responsibilities as defined in NARA regulations and guidance; and
- Ensuring compliance with NARA requirements for electronic records. This includes:
 - a) Managing all permanent electronic records electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format; and
 - b) Managing all email records electronically and retaining them in an appropriate electronic system that supports records management and litigation requirements, including the capability to identify, retrieve, and retain the records for as long as they are needed.

In addition, the SAORM is responsible for formally designating the agency RO and informing NARA in writing of this decision. Other responsibilities include submitting reports to NARA, supporting records management inspections and other oversight activities, and participating in meetings and working groups dedicated to improving

records management across the Federal Government.

5. What must SAORMs consider when determining resources for records management and information governance programs?

SAORMs must identify and advocate for the financial, personnel, and technological resources necessary to ensure that adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency is preserved and usable for as long as needed to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities.

When planning resources, SAORMs must consider:

- Mission, size and structure of the agency;
- Volume and format of records associated with the primary mission;
- Risks associated with the management of that information; and
- Information resources, including planned investments in information technology that affect the management and preservation of records.

6. Which Departments or agencies must have a SAORM?

Every Department and Federal agency covered by the Federal Records Act (FRA) must have a SAORM. As a best practice, NARA encourages agencies not covered by the FRA to designate SAORMs.

Departments and agencies have some flexibility in meeting this requirement. For example, Departments can centralize or decentralize the SAORMs for their component agencies. This allows a Department to designate a single SAORM who covers multiple organizations or designate multiple SAORMs who cover specific components. NARA strongly recommends that the head of each executive Department or agency coordinate the designation of the SAORM. If the designation of the SAORM is not made by the agency head, the designation must be established by an agency official more senior than the SAORM designee.

Normally, due to the distinct responsibilities of the agency SAORM and RO, the agency's RO should not also serve as the SAORM. However, in small agencies with limited staffing, the RO and the SAORM may be the same individual who holds both operational and strategic responsibilities for records management in the agency.

7. What is the appropriate level within the organization for a SAORM?

NARA recognizes agencies, Departments, and components have different organizational structures, budgets, and cultures. The SAORM must be placed high enough in the organization to be able to directly engage with, if not report to, the agency head and other senior staff in strategic planning for the records management program. For Cabinet-level Departments, the SAORM should be at the Assistant Secretary level or an equivalent position.

NARA will contact the agency if we determine that the SAORM designee is not adequately positioned to execute the roles and responsibilities defined in this Bulletin.

8. What is the process for submitting SAORM designations?

The SAORM designation must be submitted in writing to the Chief Records Officer for the U.S. Government. The designation can be emailed to PRMD@nara.gov or mailed to:

National Archives and Records Administration
Chief Records Officer for the U.S. Government
Suite 2100, 8601 Adelphi Road, College Park, MD 20740

Agencies must include the following information for the SAORM designation.

- Name of SAORM
- Position/Title
- Mailing Address
- Office Telephone Number
- Preferred Email Address

Each agency must promptly notify NARA when the SAORM designation or contact information changes. NARA will post the name of the SAORM on [our website](#), unless directed by the agency to not publicly share this information.

9. What is the process for submitting the RO designations?

The RO designation should be submitted in writing by the SAORM to the Chief Records Officer for the U.S. Government. New designations or updated RO information should be submitted either via a letter or email from the SAORM (or email from other designated agency staff with attachment of signed letter) to the RO.Updates@nara.gov mailbox. Alternatively, letters may be mailed to:

National Archives and Records Administration

Chief Records Officer for the U.S. Government
Suite 2100, 8601 Adelphi Road, College Park, MD 20740

Agencies must include the following information for the RO designation.

- Name of RO
- Department Name / Office Name
- Mailing Address
- Email Address
- Office Telephone Number

10. Whom do I contact for more information?

We maintain a [SAORM page](#) on our website. Information currently available includes guidance about the SAORM position, the SAORM contact list, and SAORM annual reporting data.

If you have questions about any part of this Bulletin, please contact NARA's Office of the Chief Records Officer at PRMD@nara.gov.