



*Senior Agency Official for Records Management  
2017 Annual Report*

The [OMB/NARA Managing Government Records Directive \(M-12-18\)](#) requires Senior Agency Officials for Records Management (SAORM) to provide an annual report to NARA. This report demonstrates how your organization is achieving the goals of the *Directive* and other important initiatives as identified by NARA.

NARA uses the reports to determine the overall progress of the Federal Government in meeting the goals of the *Directive* transitioning to electronic recordkeeping. Additionally, NARA uses the report for information sharing purposes to provide best practices and model solutions with Federal agencies.

The reporting period begins on January 8, 2018 and reports are due back to NARA no later than March 16, 2018.

NARA plans to post your 2017 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 progress through December 31, 2017.
- 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 [PRMD@nara.gov](mailto:PRMD@nara.gov). Include the words "SAORM 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: Edward Hugler
- Position title: Deputy Assistant Secretary for Operations
- Address: U.S. Department of Labor, 200 Constitution Avenue, NW, Washington, DC 20210
- Office telephone number: 202-693-4040

**1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM?**

The Department of Labor (DOL)

1. Adjudicatory Boards (ARB, BRB, ECAB)
2. Administrative Law Judges (OALJ)
3. Assistant Secretary for Policy (ASP)
4. Bureau of International Labor Affairs (ILAB)
5. Bureau of Labor Statistics (BLS)
6. Employee Benefits Security Administration (EBSA)
7. Employment and Training Administration (ETA)
8. Office of the Executive Secretariat (EXEC SEC)
9. Mine Safety and Health Administration (MSHA)
10. Office of the Assistant Secretary for Administration and Management (OASAM)
11. Office of the Chief Financial Officer (OCFO)
12. Office of Congressional and Intergovernmental Affairs (OCIA)
13. Office of Disability Employment Policy (ODEP)
14. Office of Federal Contract Compliance Programs (OFCCP)
15. Office of Inspector General (OIG)
16. Office of Labor-Management Standards (OLMS)
17. Office of Public Affairs (OPA)
18. Occupational Safety and Health Administration (OSHA)
19. Office of the Solicitor (SOL)
20. Office of Workers' Compensation Programs (OWCP)
21. Veterans' Employment and Training Service (VETS)
22. Women's Bureau (WB)
23. Wage and Hour Division (WHD)
24. Ombudsman (OMBUD)

**2. Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)**

- Yes  
 No

*Please explain your response:*

*In November 2015, DOL Records Management established SharePoint sites for all its assigned agencies for the maintenance and storage of their records program records, providing guidance and training on the use of the application and its tools.*

*In August 2016, the Department of Labor (DOL) established a working group with its agency representatives to address the electronic signature directive. The purpose of this policy is to: Establish the Department's policy for using and accepting electronic signatures; and Enable the Department to fulfill its obligations under the Government Paperwork Elimination Act (GPEA), Public Law 1-5-277 (codified at 44 U.S.C. 3504), and implement OMB guidance. While the directive has not been finalized, it is in the final clearance process.*

*In January 2018, DOL initiated the use of a new case management tracking system which replace a legacy correspondence tracking system. The new system will allow the management of high level correspondence, which includes a majority of permanent records, to be managed throughout their lifecycle.*

**3. Has your agency developed plans or taken actions to evaluate and implement the digitization of permanent records created in hard copy or other analog formats (e.g., microfiche, microfilm, analog video, analog audio)? (M-12-18 Goal 1.1)**

Yes

No

*Please explain your response and include any obstacles you are facing in planning or implementing digitization initiatives.*

*While the Department is still developing plans on policy and guidance many agencies have taken the initiative with scanning projects with currently held hard copy permanent and temporary records.*

*DOL is piloting a case management system built on the Appian platform. The pilot with controlled correspondence began January 2018 and will conclude April 2018. The records management team expects to determine the capability of the software and how widely the platform can be used with the Department of Labor. It is imperative to determine if we can unify critical capabilities in support of all styles of Departmental business work-flow.*

*Note, that various agencies already create and maintain permanent electronic records electronically and have been archiving them for the past several years.*

4. **OMB M-17-22 required agencies to create reform plans that may result in re-organizations and the elimination of offices and/or functions. Where necessary, has your agency taken steps to ensure that recordkeeping requirements and other records management needs have been or will be accounted for and implemented when making these changes?**

- Yes  
 No

*Please explain your response:*

*In part, the Department has proposed the following projects as part of the agency reform plan:*

- *Implement Enterprise-wide Case Management Platform*
- *Make DOL's Document-Based Resources More Electronic and Accessible*
- *Pilot a Digital Production and Service-Delivery Model*

5. **Have you, as the SAORM, taken steps to ensure that your records management program has the strategic direction, support and resources it needs to be successful?** (see: NARA Bulletin 2017-02: Guidance on Senior Agency Officials for Records Management <https://www.archives.gov/records-mgmt/bulletins/2017/2017-02.html>)

- Yes  
 No

*Please explain your response*

*The DOL directive Department of Labor Manual Series (DLMS) 1 – RECORDS MANAGEMENT Chapter 400 – Records Management Program Date: May 2017, currently includes the language mandating agencies to appointing their SAO “to oversee and assist the Departmental SAO in obtaining feedback on actions required. The SAO also coordinates with the Departmental Records Officer (DRO) to incorporate NARA records management goals and tasks within DOL's plans and strategies.”*

*In the September 2017 NARA Inspection Report it was mentioned “The DRO receives strong support from the DOL SAORM and has excellent lines of communication with agencies and offices throughout DOL. There is also a close organizational relationship between the DRO and the Office of the Chief Information Officer (OCIO), which can be leveraged to meet the electronic records requirements of the Office of Management and Budget (OMB) and NARA Directive M-12-18.2.”*

*Reference: <https://www.archives.gov/files/records-mgmt/DOL%20Records%20Management%20Inspection%20Report.pdf>*

**6. Have you, as the SAORM, ensured that all incoming and outgoing senior officials\* receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements.**

\*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:

*DOL has currently updated its current records directive, DLMS 1 – RECORDS MANAGEMENT Chapter 400 – Records Management Program Date: May 2017 to include additional guidance and practices already in use within the Department. The clearance of the new directive is in final stages, with an estimate completion date of no later than September 30, 2018.*

*“422 Personnel Arrival Training Requirements*

*All new employees including contractors and interns, must complete the Departmental Records Management for everyone course within 60 days of arrival. Additionally, agencies will provide guidance on where records should be maintained to include storage, access, and application of disposition instructions of assigned records.*

*DRO or ARO’s must provide targeted records management training to political appointees, senior agency officials, and senior executives upon their arrival. This may include conducting entry interviews with your agency's records management staff, IT liaisons, and general counsel to ensure that records are preserved and protected.”*

*“423 Personnel Departure Training*

*All departing employees including contractors and interns will be briefed by their ARO or RL on agency records management departure procedures. At a minimum, agencies should provide departure procedures 90 days in advance, or as soon as the individual notifies the agency of their departure, to allow records preparation and transfer prior to the employee's departure date. All DOL employees must request and obtain approval from their ARO for removal of copies of materials or information they may desire to take. To the extent questions remain after discussions with the ARO, the employee should work with the ARO to identify the appropriate agency FOIA representative. In the event that any questions involve by review, the employee should work with the ARO and the agency FOIA representative to identify and coordinate with the appropriate SOL office to assist with the review. For senior officials including Agency Heads, Career and non-career Senior Executive Service (SES) employees, Schedule C employees, and Presidential Appointees with or without Senate Confirmation (PAS/PA) please refer to the*

*DOL Policy on Guidelines Governing Disposition of Federal Records when Leaving the Department of Labor found on LaborNet.*

*DRO or ARO's must provide targeted (i.e. agency specific) records management training to political appointees, senior agency officials, and senior executives upon their departure, and/or within three to six months prior to a presidential administration change; whichever comes first. This may include conducting exit interviews with your agency's records management staff, IT liaisons, and general counsel to ensure that records are preserved and protected."*

**7. Is the records management program and related requirements included in your agency's Information Resource Management Plan or an equivalent information management plan? ([OMB Circular A-130, Managing Information as a Strategic Resource](#))?**

Yes

No

Please explain your response:

*Records Management elements are in the current IRM.*

*"Objective 2.2: Preserve electronic records*

*In response to OMB's Directive on Managing Government Records (M-12-18) and Guidance on Managing Government Records (M-14-16) the Department will work towards developing an enterprise records management solution to manage all email and permanent electronic records in an accessible, electronic format. To that end, the Department is exploring the use of National Archives and Records Administration's (NARA) Capstone Approach as a solution to temporary and permanent email records management in efforts to meet the December 31, 2016 deadline as directed in M-12-18. NARA's approach coupled with the retention and archiving capabilities provided by DOL's cloud-based email solution may be a feasible means to establish a solution to manage email in the cloud.*

*The anticipated cloud-based solution will support both records management and litigation requirements providing the necessary capabilities to identify, retrieve, and retain email records for as long as they are needed. In addition, DOL will undertake a planned, collaborative effort between the OCIO, Business Operations Center, and the agencies to establish policies and procedures to manage permanent records electronically by December 31, 2019."*

*Reference: <https://www.dol.gov/oasam/ocio/DOL-IRM-SP.pdf>*

**8. What policies, guidance or support do you need from NARA to ensure a successful transition to fully electronic recordkeeping? (NARA Strategic Plan. Goal 2.4)**

*NARA should accommodate agencies by enabling all of their Federal Records Centers (FRCs) to meet electronic records storage services by 2019. Currently NARA has only 1 out of 17 FRCs*

*equipped to store electronic media with limited services. Agencies will need the support to refresh electronic records to the current and accessible applications in addition to the use of long term storage media devices.*