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
- Position title
- Address

Ketan Bhirud
Legal Counsel
US EEOC
131 M St. NE
Washington, DC 20507

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.**

US Equal Employment Opportunity Commission

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

☐ Yes
X No

Please explain your response:

Key mission systems used by the Office of Field Programs, Office of General Counsel and Office of Federal Operations already are already in compliance with many aspects of the requirement to manage permanent electronic records in electronic format. EEOC's migration to Office 365 and its adoption, in 2017, of the "Capstone" approach to email management, also represents significant progress towards this goal.

EEOC senior leadership is committed to continuing to make progress towards this requirement. Among other things, EEOCs senior leadership believes that the Agency must first update the Agency's records retention schedules and develop and implement additional records management policies and procedures. EEOC senior leadership is committed to devoting appropriate additional resources to these efforts.

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)**

X Yes
☐ No

Please explain your response (include specific goals and example metrics):

Key mission systems used by the Office of Field Programs, Office of General Counsel and Office of Federal Operations are already in compliance with many aspects of the requirement to manage permanent records in an electronic format with appropriate metadata. EEOC's migration to Office 365 and adoption, in 2017, of the "Capstone" approach to email management, also represents significant progress towards this goal. EEOC senior leadership believes that the work described in Response #2 above will enable the Agency to make significant progress towards this additional goal, and is committed to devoting appropriate additional resources to these efforts.

4. **Has your agency made progress towards managing all <u>temporary</u> records in electronic format? (M-19-21, 1.3)**

X Yes
☐ No

Please explain your response (include specific goals and example metrics):

Key mission systems used by the Office of Field Programs, Office of General Counsel and Office of Federal Operations are already in compliance with many aspects of the requirement to manage temporary records in an electronic format. EEOC's adoption, in 2017, of the "Capstone" approach to email management also represents significant progress towards this goal. EEOC senior leadership believes that the work described in Response #2 above will enable the Agency to make progress towards this additional goal.

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
X No

Please explain your response (include specific goals and example metrics):

EEOC designated a new SAORM in February 2020. The office of the new SAORM anticipates that setting performance goals, objectives and measures for the records management program will occur this fiscal year.

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)**

X Yes
☐ No

Please explain your response (include specific goals and example metrics):

EEOC does not maintain any agency-operated records centers.

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.

X Yes
☐ No

Please explain your response (include specific details of procedures):

EEOC has adopted and documented procedures for outgoing senior officials, that ensure that both email records and other unstructured data in their Office 365 accounts are appropriately captured and preserved, and not improperly removed, altered or deleted.

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

X Yes
☐ No

Please explain your response (include details of specific challenges, if applicable):

EEOC senior leadership believes that while significant work is necessary to align the Agency's electronic systems with approved records schedules, these key systems have long enabled search, retrieval and use of electronic information. The Agency recently was awarded four million dollars in no-year funding and has begun work on modernizing its Integrated Mission System ("IMS"). The Agency believes it now has the resources to systematically undertake a complete overhaul of its internal digital systems, which will enable the EEOC to support fully digital services. This work will also support EEOC's records management initiatives and compliance obligations. While developing and implementing robust records management policies and procedures during this period of intensive development poses a challenge, EEOC senior leadership believes that appropriate resources are being committed to meet this challenge.

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

X Yes
☐ No

Please provide details on what support is needed:

EEOC senior leadership appreciates NARA's assistance in this regard. Representatives of EEOC senior leadership are already in contact with NARA personnel regarding ways in which NARA support can be provided.