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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: Vaughn Noga
- Position title: Chief Information Officer and Deputy Assistant Administrator for Environmental Information
- Address: U.S. EPA Headquarters, William Jefferson Clinton Building, 1200 Pennsylvania Avenue, N.W., Mail Code 2810A, Washington, DC 20460

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: Environmental Protection Agency

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:

   EPA continues to work with owners of electronic information systems to ensure permanent electronic records are scheduled and transferred per instructions in the approved records schedules. To date, there are 34 EPA electronic information systems containing permanent records, and EPA tracks and assists headquarters program and regional office contacts with transfers of data from these systems to NARA.

   Two other major EPA records collections containing permanent records, the Federal Docket Management System (FDMS) and the Superfund Enterprise Management System (SEMS), are in the process of implementing or developing records management modules in their electronic systems. FDMS has a NARA-approved records schedule; a records schedule for SEMS will be resubmitted to NARA in CY 2020.

   EZ Desktop Records was developed for non-email electronic records and implemented agency-wide in CY 2018. EZ Desktop Records allows EPA staff to

easily transfer records on their desktop computer to the Agency's record repository Enterprise Content Management System (ECMS). We are enhancing EZ Desktop to require that all records that are submitted to ECMS also contain record schedule information.

To help identify any gaps, EPA sent a data call to the headquarters program offices and regions asking them to review the current list of permanent records to determine if there were any permanent electronic records not currently captured in an electronic recordkeeping system. The results will be used to help determine the most efficient method for managing and eventually transferring the records to NARA in an electronic format.

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):

EPA requires electronic systems to be registered in the Agency's Registry of EPA Applications, Models and Data Warehouses (READ), which is the authoritative source of information about EPA electronic information resources. Each information resource has a record in READ that identifies if it is an application/system or a model. The record also includes basic information about the resource such as the title, acronym, description, contact information and organization owner or operator. More detailed information is also available, such as whether the resource supports a federal statute and, in the case of an application/system, how the application/system conforms to the Enterprise Architecture (EA). Life cycle information, user types, and access information are also included.

EPA's National Records Management Program (NRMP) has made it a requirement that the appropriate records schedule that applies to each system also be included in READ. The database is updated with new systems on an ongoing basis and reviewed to ensure that the records schedules assigned are accurate and that permanent records are transferred to NARA in accordance with the records schedule.

EPA commissioned a cross-Agency workgroup to develop a plan and make recommendations for meeting NARA's M-19-21 goal that by December 31, 2022,

Federal Records Centers will no longer accept records in analog format, to the fullest extent possible. With these goals in mind, EPA developed an Agency-wide data call and inventory with several objectives, one of which is to ensure that permanent electronic records are identified and managed electronically.

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

☒ Yes
☐ No

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

NRMP formed a 2019/2022 Workgroup in 2018 to develop a strategy to meet OMB's and NARA's Managing Government Records Directive and the NARA's 2018-2022 Strategic Plan goal to manage all temporary records in electronic format. When M-19-21 was released on June 28, 2019, the Workgroup started focusing on the additional NARA and OMB goals.

EPA seeks to ensure that all closed/eligible long-term temporary analog records are transferred to the Federal Records Center before December 31, 2022 and estimate the volume of paper records maintained in offices that may require digitization.

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):

NRMP ensures that records management policies, procedures, and retention schedules are being properly implemented by encouraging awareness and use of the Agency Records Management Policy and records retention schedules, as well as by convening periodic meetings with RLOs and other records contacts. In addition, the Agency advances the implementation of records management policies, procedures, and retention schedules by providing annual mandatory online records management training to all EPA employees.

Finally, RLOs and records contacts across the Agency have access to Enterprise Content Management System (ECMS) usage statistics through Qlik dashboards. Qlik currently displays active user and usage information and can show who is

saving email versus desktop records. Regular checks of the ECMS system logs are performed, which can be used to track various records management activities.

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):

M-19-21, 1.3 § 2 requires additional definition regarding the type of agency-operated records storage facilities covered by the memorandum. EPA Agency Records Officer (ARO) requested guidance on the definition from the Office of the Chief Records Officer. The ARO was instructed that a frequently asked questions (FAQ) document would be issued by the National Archives providing such guidance. EPA has not received the FAQ document. In 2019, EPA's SAORM sent an email regarding EPA plans for digitizing records to the Office of the Chief Records Officer, which included plans to stage records for digitization in two locations. The staging/digitization is expected to support closing agency-operated records storage facilities, if any are identified. EPA has received no further communications from NARA regarding the plans outlined in the SAORM email.

EPA sent out a data call to all Program Office and Regional RLOs to identify all agency-operated records centers and make plans to either close them before 2022 or submit a request to NARA for an exception following the issuance of the M-19-21 FAQ referenced above. As expected, no agency-operated records centers were identified at the time.

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):

> All outgoing EPA personnel, including senior officials are required to complete an EPA Records Management Checklist for Separating/Transferring or Separated Personnel, EPA Form 3110-49, when they separate from the Agency or transfer within the Agency. This checklist helps ensure that the records created during an employee's tenure are appropriately identified, saved in a recordkeeping system and maintained according to the appropriate EPA Records Retention Schedule.

> Additionally, all EPA personnel, including senior officials are required to take mandatory records management training. This training includes guidance on all records management responsibilities.

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):

One of EPA's challenges with fully-electronic recordkeeping is changing the culture across the agency. We need to identify and change business processes that currently create paper and provide guidance to fully implement electronic processes. We implemented a data call to develop an inventory of paper-based business processes as the first step toward this goal. The next step is to follow-up with programs and regions to ensure they move from paper- to electronic- based business processes. Another challenge is stopping the flow of paper into the Agency coming from the regulated community.

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:

> To aggressively transition to fully electronic recordkeeping, EPA is currently investing in staff, facilities and technology to digitize its large collection of open/active permanent and long-term temporary paper records. The issuance of Memorandum M-19-21 resulted in a significant number of questions related to the establishment of the EPA's Centralized Records Staging and Digitization program.

EPA urgently needs NARA to issue:

1. Guidance and instructions to federal agencies on implementing M-19-21, per its commitment in FY19.
2. Regulations to permit the destruction of permanent source-paper records after digitizing.