



## ***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](mailto: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: John L. Hairston
- Position title: Administrator and Chief Executive Officer  
DOE – Bonneville Power Administration
  
- Address: DOE- Bonneville Power Administration  
905 NE 11<sup>th</sup> Avenue  
Portland, OR 97232

**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.*

DOE – Bonneville Power Administration

**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):*

Prior to the pandemic, BPA had already implemented a well-established information governance program (as noted in the 2021 NARA inspection of the Department of Energy) and intellectual control of its information through the policy of mandatory Information Asset Plans (IAPs) for all departments. Throughout the pandemic, BPA's Information Governance & Lifecycle Management (IGLM) program has adjusted its practices to provide information management requirements and guidance through web-enabled information sessions and customized information sessions as requested.

COVID-19 has impacted BPA's continued reliance on analog records and has resulted in a reduction of both creation and receipt of hardcopy records. Departmental units that have traditionally created hardcopy records as part of their business processes were unable to in a telework environment and discovered they had no need for the paper versions. This impact has immensely aided our efforts to become a fully electronic records environment.

However, the pandemic has impeded our ability to assess the current volume of permanent and temporary records to meet the requirements of M-19-21. We have been unable to enter our records holding area in our headquarters facility to dispose of temporary physical records and prepare offers to NARA of any eligible analog permanent records. Additionally, BPA is retaining all COVID related records permanently because they are unclassified. We have a project plan to assess and move as quickly as possible to comply with M-19-21.

**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.*

I have empowered the Audit, Compliance, & Governance Committee (ACGC) of the Enterprise Board to oversee compliance and governance programs, including the records management program (known as the Information Governance & Lifecycle Management program at BPA). The ACGC includes the Chief Administrative Officer, Chief Operating Officer, Chief Workforce and Strategy Officer, Executive VP of Compliance, Audit, and Risk, Chief Financial Officer, and General Counsel. The BPA Agency Records Officer has identified specific goals in the annual program work plan, and these are communicated to the Information Governance Oversight Team (IGOT), a sub-committee that reports to ACGC that is comprised of managers across all lines of business including CIO and Security roles. BPA's Agency Records Officer is also the Privacy Officer and FOIA Officer. BPA's Agency Records Officer is also a member of the Data Governance Oversight Team.

**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):*

BPA's Information Governance & Lifecycle Management (IGLM) program has developed a project plan to meet the current milestones in OMB/NARA M-19-21. IGLM is revising this project plan to undertake as much prep work that can be done in telework status due to COVID. IGLM will revise metrics to track project plan progress and report out progress quarterly to its steering committee (Information Governance Oversight Team). Currently BPA is:

- Taking steps to complete inventories of permanent analog records by surveying managers whose organizations have indicated may have analog records. This work was delayed due to COVID restrictions and an inability to be onsite and an inability for most individuals to be onsite to complete this work. BPA will use this information to develop more specific plans to digitize or direct offer to NARA by December 31, 2022 and identify record series that may request an exception to the M-19-21 requirement.
- Reviewing and updating organization Information Asset Plans (IAPs).
- Evaluating metadata captured at the time of creation for digital records and comparing it to NARA's requirements for transferring permanent records to determine if there are any gaps.
- Expanding the use of BPA's Electronic Records Management System to house permanent digital records.

The BPA Library will also inventory its holdings – including permanent records. We do not yet know if the milestones will be met. This depends on the volume of analog permanent records.

**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):*

BPA's Information Governance & Lifecycle Management (IGLM) program developed a project plan to meet the current milestones in OMB/NARA M-19-21. IGLM is revising this project plan to undertake as much prep work that can be done in telework status due to COVID. IGLM will revise metrics to track project plan progress and report out progress quarterly to its steering committee (Information Governance Oversight Team). Currently BPA is:

- Taking steps to complete inventories of temporary analog records by surveying managers whose organizations have indicated may have analog records. This work was delayed due to COVID restrictions and an inability for most individuals to be onsite to complete this work. BPA will use this information to develop more specific plans to digitize by December 31, 2022, and identify record series that may request an exception to the M-19-21 requirement.
- Updating and reviewing organization Information Asset Plans (IAPs).
- Expanding the use of BPA's Electronic Records Management System to house temporary digital records.

The BPA Library will also inventory its holdings – including temporary records. We do not yet know if the milestones will be met. This depends on the volume of analog temporary records. Due to COVID restrictions, we have been unable to enter our records holding area in our headquarters facility to validate temporary records holdings since March 2020.

*Identifying record series that may be requesting an exception.*

**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.*

BPA is unable to determine at this time if we have plans to submit to NARA a request for an exception to OMB/NARA M-19-21 requirements before December 31, 2022. Work is currently underway (see our response to number 5) to complete determine the permanent analog volume and identify those business processes that continue to rely on temporary analog records. This has been delayed due to COVID restrictions and an inability for most individuals to be onsite to complete this work.

**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.*

BPA has already procured an Electronic Records Management System, Content Manager (CM) by Micro Focus. CM manages, tracks, locates and holds unstructured data to comply with current federal and legal requirements for information governance, discovery and FOIA.

**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.*

BPA does not operate an agency storage facility and does not need to change its procedures to meet this requirement.

**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):*

BPA, as with all Federal agencies, is making a steady transition to an entirely digital environment. Those organizations that retain some paper records within their business process will require greater resources to meet this goal.

**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):*

BPA currently uses guidance and training resources available on NARA's website and records management staff attend Bimonthly Records and Information Discussion Group (BRIDG) meetings hosted by NARA. BPA also receives notices from NARA and the DOE Records Management Program.