



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. 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: Kimberly D. Bose
- Position title: Commission Secretary, SAORM
- Address: 888 1st Street NE, Washington, DC 20426

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.

The Federal Energy Regulatory Commission (FERC)

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):
the COVID-19 pandemic and the Maximum Telework Schedule implemented across Federal agencies

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.

The FERC has established an information governance framework that integrates records management, data governance, information governance (CUI Management), CIO/IT, Privacy Officer, FOIA etc., by connecting key stakeholders.

Records Management has effective relationships with the above-mentioned business offices to maintain Federal Records Management compliance, accomplish goals and the agency's mission.

Below are examples of our information governance framework and how it integrates records management, data governance, information governance, CIO/IT, Privacy Officer, and FOIA:

- **Data Governance** - Provides Strategy, Governance, Project Management Support, and Orchestrate Shared Data Services Across the Commission Manages all FERC Data, Both Structured and Unstructured, Throughout the Data Lifecycle

- **Records Management** - Participate with the Data Governance Group in an Advisory Capacity; such as, discussing and providing records and data retention rules and managing the electronic data throughout its' lifecycle.

- **Information Governance (CUI Management)** - Involves the Protection of Sensitive Information and Records Management to develop standards and practices in the valuation, creation, storage, use, archival and disposition of information.

- **CIO/IT** – Collaborates with the CIO/IT Department to achieve Federal Electronic Recordkeeping goals and compliance. The following are several examples of our integration:
 - Electronic Information Systems – The IT and Records Management Division are Presently analyzing our eLibrary Information System to determine whether or not it meets the Federal Electronic Records Management regulations for e-records management. After analysis, IT will work to embed required records management functions into the system.
 - Capstone – Records management and IT collaborated to develop a systematic and simplified way for the FERC to manage email records. As a result, our Capstone Records Schedule has been approved and implemented.
 - Collaboration is a continuous effort to ensure our Electronic Records Management Program and Processes are compliant and successful.

- **Privacy Officer** – Collaborates with the Privacy Officer/office to discuss, review and apply record retentions on records in the custody of the FERC and which information is maintained/ retrieved by the name of the individual or by some identifying number, symbol, or other identifiers assigned to the individual.

- **FOIA** - Collaborates with the FOIA Officer/office on records access and records of interest. Discuss records identification and the transfer/accessioning of permanent records to the National Archives to ensure future access to agency records.

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):

- The agency permanent records are created and received in an electronic format and maintained in electronic information systems and on our external website.

Our electronic information systems, which are used to capture, maintain, and preserve the Commission records throughout their lifecycle, meets the agency business needs and manages it's records accordingly.

- The Capstone Records Schedule was approved on May 14, 2018. Upon approval, the FERC implemented its plan to maintain the Chairman and Commissioner's emails for fifteen years after separation from the agency then transfer them to NARA for permanent preservation.

Other FERC employee emails are maintained for ten years after separation from the agency then deleted.

- The Commissions approved Records Management Policy, which includes electronic records requirements ensures that permanent records are managed accordingly and provided to NARA in a NARA-accepted format or they are converted to an acceptable format without loss of data or integrity.
- Records Management incorporated permanent record series and records retention rules in all program office file plans as another method to ensure that permanent records are retained and transferred to NARA in accordance with approved records schedules and disposition instructions.
- Implementation of the Electronic Data Management Policy, which includes requirements and procedures for managing electronic data. This policy addresses the following criteria:
 - Establishing formally approved email policies,
 - Use of any automated systems for capturing email
 - Providing access / retrieval of email
 - Establishing disposition practices for agency email
 - Implementation of the Capstone approach for applicable

agency email.

- Providing accountability and management of the electronic data received and created
- Managing FERC electronic records in accordance to the FERC Comprehensive Records Disposition Schedule, the National Archives and Records Administration's General Records Schedules and NARA implemented records management requirements.

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):

The FERC is working to meet the goal to manage and preserve all temporary records in an electronic format by December 31, 2022. The agency has awarded a contract (February 2022) to ensure all of our long-term temporary records stored on aperture cards, microfilm, and microfiche will be properly managed and preserved in an e-format throughout its' lifecycle.

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.

If for some reason we experience challenges with our implemented Electronic Records Management plans for meeting the M-19-21 Requirements before/by December 21, 2022, we may have to submit a request for an exception.

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.

The FERC is utilizing a Department of Energy (DOE) CIO Business Operation Support Services (CBOSS) contract for our solutions for transitioning to an Electronic Environment.

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.

At this time, we see no need to store temporary records in commercial storage facilities; however, our regulatory filing and Commission Proceedings requirements currently permits the submission of paper records and have yet to be revised, so we may request an exception or resort to storing future paper records (agency filings/submissions) in a commercial storage facility if needed.

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):

The steps the FERC has taken to meeting the goal of fully electronic recordkeeping poses no challenges thus far.

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

No suggestions, but the Commission welcomes any information or guidance related to improving the SAORM roles, responsibilities and NARA interactions.

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):