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 19, 2021, and reports are due back to NARA no later than March 19, 2021.

NARA plans to post your 2020 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 both records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2022, 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 rmselfassessment@nara.gov. Include the words “SAORM 2020 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: Vanessa Lamb
- Position title: Associate Managing Director
- Address: 45 L St., NE Washington, DC 20554

1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately?

   The Federal Communications provides a single, consolidated report for all Bureaus and Offices.

2. Has the COVID-19 pandemic changed any policies or practices related to records management at your agency?

   x Yes
   □ No
   □ Do not know

   Fulfillment of requests for access to analog records located at offsite records centers has not been possible given the need to close these facilities due to the pandemic. We have posted information on our website that identifies the potential delays obtaining offsite records and are keeping a log of requested documentation and will provide to requestors as soon as possible.

3. Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)

   x Yes
   □ No
   □ Do not know

   Yes, FCC has an informal information governance framework that connects the CIO, SAORM, ARO, RM Staff and FOIA Public Liaison. In fact, each of these roles are held by employees in the Office of the Managing Director and the SAORM, ARO, RM Staff and FOIA Public Liaison all work for the Associate Managing Director responsible for records management and the FOIA service center. Organizationally, this framework allows for more efficient and effective coordination among these roles.

4. 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)
We have made some progress towards managing all permanent records in an electronic format. Specifically, we have identified our inventory of permanent records and are currently working with bureau and office representatives to identify the current media format.

5. Has your agency made progress towards managing all temporary records in an electronic format by December 31, 2022? (M-19-21, 1.3)

x Yes
☐ No
☐ Do not know

We have made some progress towards managing all temporary records in an electronic format. Specifically, we have identified the media format for our inventory of more than 400 information collections and have determined that approximately 75% of the collections are in an electronic format. Next steps include collaborating with bureau and office representatives to determine steps necessary to convert the collections to an electronic format.

6. Is your agency investing resources in IT to support the transition to electronic recordkeeping?

x Yes
☐ No
☐ Do not know

We intend to use the Microsoft 365 (M365) suite to manage our unstructured data records electronically. In addition, we have been approved to procure Active Navigation to manage and control this data. Records that are found in databases will be managed using an enterprise content management approach.

7. To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)

x Yes
☐ No
The FCC does not have an agency-operated records center and plans to continue using commercial storage facilities to store inactive temporary paper records.

8. Does your agency have policies and procedures that include documentation to ensure records of newly appointed and 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
☐ Do not know

We have an electronic onboarding and exiting process that includes records management staff. We also use a checklist to ensure that departing employees comply with records management requirements and meet with senior officials to confirm understanding of the requirements. In addition, the ARO coordinates the approval process when departing employees request to remove copies of records.

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

☐ Yes
☐ No
☐ Do not know

I am concerned that if the December 31, 2022 deadline is not extended, the FCC will not meet the goal of fully-electronic recordkeeping and have to spend millions of dollars digitizing a large volume of our permanent paper records that we have not been able to transfer to the Federal Records Center due to the pandemic.

10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?

☐ Yes
x No

☐ Do not know

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