



## ***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: Vanessa Lamb
- Position title: Associate Managing Director
- Address: 45 L Street, NE, Washington, DC

**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 Commission (FCC) provides a single, consolidated report for all Bureaus and Offices.

**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):*

Due to the pandemic and mandatory telework status, we have postponed fulfilling public access requests to paper records until the FCC returns to a normal operating status.

**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

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. 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 FCC is diligently working to meet the goal of managing and preserving all permanent records in electronic format with appropriate metadata by December 31, 2022. Unfortunately, we have faced some challenges due to mandatory telework and temporary closure of the Federal Records Centers (FRC). Specifically, we have been unable to make transfers to the Washington National Records Center (WNRC) due to closure, but have just learned the center has recently implemented a “transfer by arrangement” policy. As a result, we have resumed our special “transfer” project and are currently in the early stages of coordinating a transfer with WRNC-Suitland management. While we expect to meet the deadline, a request for an exception to the requirement will be submitted should we encounter challenges that may possibly result in not meeting the goal.

**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):*

We have made significant progress towards managing all temporary records in an electronic format and have determined that approximately 99% of our inventory of more than 400 information collections are received, managed and preserved in an electronic format.

**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.*

Due to the mandatory telework status and temporary closure of the FRCs, the FCC was unable to transfer permanent paper records to the WNRC-Suitland. However, we have just learned of the facility's "transfer by arrangement" policy and are currently making transfer arrangements with WNRC management. While we expect to meet the deadline, a request for an exception to the requirement will be submitted should we encounter challenges that may result in not meeting the December 31, 2022 goal.

**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.*

To date, we have not utilized the General Services Administration's Special Item Number for Electronics Records Management (518210 ERM) 6 to procure solutions to assist in 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.*

The FCC does not have an agency-operated records center and plans to continue using commercial storage facilities to store inactive temporary paper 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

All permanent electronic records are being reviewed to identify which meet the transfer guidance criteria and to determine next steps to preparing them for transfer to NARA. In addition, we are identifying permanent analog records that we would like to send to the Federal Records Center ahead of the 12/31/2022 deadline. Due to the pandemic, we have been unable to transfer these records and expect to request an extension in the coming months.

**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):*