



## ***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: Kate Higginbothom
- Position title: Deputy Staff Director – Management & Administration
- Address: 1050 First Street, N.E., Washington, D.C. 20463

**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.*

Federal Election Commission

**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):*

In response to the COVID-19 pandemic, the FEC transitioned to a mandatory telework status in mid-March of 2020, with only a limited number of staff reporting to the agency's offices on an intermittent basis to perform essential onsite services. With the FEC operating in a close to 100 percent telework status, agency personnel have been creating and maintaining nearly all new agency records in an electronic format over the past two years. With this change in the FEC's telework posture, certain agency policies and practices have been modified during this period. For example, existing agency policy provided that certifications of official Commission votes, which are permanent records, would be created in hardcopy and embossed with a physical seal. The Commission approved a temporary change to this policy, which allows the agency's Office of the Commission Secretary to create vote certifications in pdf format and to affix the documents with an electronic seal. Overall, the shift to creating and maintaining these documents solely in an electronic format has gone very smoothly and has helped to lay a foundation for moving the agency toward maintaining these documents and all other permanent records in electronic format. The FEC plans to begin returning employees to in-person work at the start of March 2022, and we hope to leverage the momentum gained over the past two years to continue moving toward fully electronic recordkeeping.

**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 FEC's SAORM and Acting ARO work closely with the CIO and other personnel in the agency's OCIO, as well as the agency's Chief FOIA Officer. However, the agency does not have an established governance framework connecting records management, data management, and other agency information lines of business. The FEC could use further guidance from NARA on best practices for establishing this type of governance framework, particularly in the context of a small agency environment in which dedicated staff and budgetary resources for records management are limited.

**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 FEC has continued to make progress toward the goal managing permanent records in an electronic format with appropriate metadata by the end of 2022. With contractor assistance, the agency completed a project for developing the email system workflows necessary to implement our Capstone Email Records Management Schedule, so that permanent email records may be managed in electronic format throughout their lifecycle for eventual transfer and accessing by NARA in electronic format. However, we have experienced some unanticipated challenges that have delayed our progress. The agency had planned to hire for a Records Management Analyst position in late-2020 and had to delay this hiring due to budgetary constraints. This position would have been the agency's first hire dedicated full-time to records management and was to be tasked with developing and implementing agency-wide records management training, updating agency records schedules in accordance with the requirements of OMB M-19-21, and revising agency records' policies and procedures. We hope to fill this position 2022. In the interim, we continue leveraging other staff resources, on an as-available basis, to address our most immediate needs in these areas. The ongoing COVID-19 pandemic has also created competing priorities for me and the Acting ARO. Nevertheless, we remain hopeful that we will be able to achieve the goal set forth in OMB M-19-21.

**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 FEC has not yet made progress toward managing all temporary records in electronic format, as the agency is currently focused on working toward managing all permanent records in electronic format. We intend to start working toward managing temporary records in electronic format later this year.

**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.*

The FEC does not plan to request an exception to the requirements given that NARA's categories for granting an exception appear to be inapplicable to our agency's records.

**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 FEC previously utilized contractor services procured outside of this vehicle to help configure the agency's email records management system. Due to overall budget constraints, we are not planning to procure other solutions to assist in transitioning to an electronic environment at this time.

**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.*

The FEC does not maintain any agency-operated records centers and is not currently transferring any paper records to the Federal Records Centers.

**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):*

As a small agency with limited staff and budgetary resources to devote to our records management program, meeting the goal of fully-electronic recordkeeping by December 31, 2022 rather challenging, particularly due to the competing priorities over the past two years during the ongoing COVID-19 pandemic. At present, the FEC has no employees who are dedicated full-time to records management. The FEC had intended to hire for a Records Management Analyst position, which would be devoted to working full-time on further developing and implementing the agency's records management program, but budget constraints in FY 2021 required hiring for this position to be placed on hold. We hope to fill this position in FY 2022, but in the meantime the agency's records management functions will continue to be performed by staff for whom records management is one of many duties.

**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):*