



Senior Agency Official for Records Management 2022 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 (OMB) and NARA issued a memorandum, *Transition to Electronic Records* ([M-19-21](#)), to ensure that all federal records are created, retained, and managed in electronic formats. M-19-21 gave agencies until the end of December 2022 to comply with several specific deadlines.

On December 23, 2022, OMB and NARA issued a new memorandum, *Update to Transition to Electronic Records* ([M-23-07](#)) reinforcing the goals in M-19-21 and extending the 2022 deadlines to June 30, 2024.

Additionally, 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 recordkeeping and preservation under these requirements, as well as other important records management initiatives.

The reporting period begins on January 9, 2023, and reports are due back to NARA no later than March 10, 2023.

NARA plans to post your 2022 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 on our website.

Instructions for Reporting:

- This template covers records management program developments, including those related to the transition to electronic recordkeeping as required by M-19-21 and M-23-07.
- 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 2022 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.

NARA may follow up with agencies to obtain additional information and/or documentation related to responses provided in the template.

As in previous years, we will be validating selected questions and responses from agencies. Your agency may be selected at random to provide additional documentation and/or take part in interviews to discuss your records management program activities.

Provide the following information (required):

- Name of SAORM: Kate Higginbothom
- Position title: Deputy Staff Director – Mgmt. & 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 indicate any that are new or have been changed due to reorganization or other circumstances.

Federal Election Commission

2. In response to the COVID-19 pandemic, have any of the temporary adaptations to agency business processes become permanent improvements to the management and preservation of electronic records?

- Yes
- No
- Not applicable, no adaptations were needed

Do not know

Please explain your response. (If Yes, include details of the changes and why they became permanent. If No, or Do not know, please explain your answer.)

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 most employees working in a full-time telework status until the Agency's workplace reentry in late-February 2022, Agency personnel were creating and maintaining nearly all new agency records in an electronic format for nearly two years. During this period, certain FEC policies and business practices were temporarily adapted. For example, the FEC's pre-pandemic policy provided that certifications of official Commission votes, which are permanent Agency records, were to be created in hardcopy and embossed with a physical seal. In spring 2020, the Commission approved a temporary change to this policy to allow the agency's Office of the Commission Secretary to create vote certifications in pdf format and to affix the documents with an electronic seal. Since workplace reentry, the Agency has continued to follow the temporary policy change and we are expecting to formally make a permanent change to the policy in 2023.

3. Has your agency taken action to meet the goal to manage, preserve and transfer all permanent records in an electronic format with appropriate metadata by June 30, 2024? (M-19-21, 1.2 and M-23-07, 1.1 and 1.2)

- Yes
 No
 Do not know

Please explain your response with specific actions taken, challenges and results.

The FEC has continued to make progress toward the goal of managing, preserving and transferring all permanent records in an electronic format with appropriate metadata by June 30, 2024. With contractor assistance, the Agency completed a project for developing the email system workflows necessary to implement our Capstone Email Records Management Schedule, so permanent email records can 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. Specifically, the Agency had to delay hiring for a Records Management Analyst position in a prior fiscal year because of budgetary constraints, and we were unable to fill the position upon readvertising the vacancy in 2022 due to a shortage of qualified candidates who were interested in the position. The position, which will be the FEC's first hire dedicated full-time to records management, is being readvertised in early-2023. Once this position is filled, we plan to place renewed focus on next steps to bring the Agency into compliance with the requirements of OMB M-19-21 and OMB M-23-07. In the meantime, the Agency continues leveraging other staff resources, on an as-available basis, to address our most immediate records management program needs.

4. Has your agency taken action to meet the goal to manage and preserve all temporary records in an electronic format by June 30, 2024? (M-19-21, 1.3 and M-23-07, 1.3)

- Yes
 No
 Do not know

Please explain your response with specific actions taken, challenges and results.

The FEC has not yet taken specific action to meet the goal of managing and preserving all temporary records in electronic format by June 30, 2024, as we are currently focused on working toward managing all permanent records in electronic format. We intend to start working toward managing temporary records in electronic format during the second half of FY 2023.

5. Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 to close agency-operated records storage facilities and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities by June 30, 2024?

- Yes
 No
 Not applicable, all records are in electronic format
 Do not know

Please explain your response with specific actions taken, challenges and results.

The FEC does not maintain any agency-operated records centers and does not anticipate any challenges in meeting the requirement to transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities by June 30, 2024.

6. Does your agency have policies and procedures that incorporate records management into the information governance (IG) framework for information, data, and other agency information management? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, Records Management (RM) Staff, Security, Privacy Officers, and FOIA)

Note: The incorporation of records management into information governance is part of the framework covered by [OMB Federal Data Strategy - A Framework for Consistency \(M-19-18\)](#) as it provides a vision for managing and using federal data, along with recordkeeping requirements included in [OMB Circular A-130, Managing Information as a Strategic Resource](#).

- Yes
 No
 Do not know

Please explain your response and provide details about how your agency's policies enhance IG and RM's role or relationship to it.

The FEC's SAORM and Agency Records Officer work frequently with the agency's Chief Information Officer and Chief Information Security Officer, as well as the agency's Chief FOIA Officer, on issues related to the records management program. The Agency's Information System Security Program policies incorporate records management principles by addressing the requirement for employees "to protect information throughout its life cycle, from creation or collection through disposition," but do not specifically reference records management program requirements. As these policies are updated, and new records management policies are developed at the FEC, we hope to create more direct linkages between the policies supporting our IG framework and RM program.

7. Has your agency developed policies and procedures to ensure the capture and preservation of electronic messages, including when hardware or software is upgraded?

Note: Electronic messages means electronic mail and other electronic messaging systems that are used for purposes of communicating between individuals. Electronic messages that satisfy the definition of a federal record under the Federal Records Act are electronic records. This includes email, text messages, chat messages, voicemail, social media posts, and other similar applications. (See: [Email Management](#) and [CFR 1236: Electronic Records Management](#))

- Yes
- No
- Do not know

Please explain your response and include details of your agency's methods to capture and preserve electronic messaging records or challenges preventing you from doing so.

The FEC has developed policies and procedures covering certain, but not all, types of electronic messages. Specifically, the Agency has an established Email Records Management Policy and procedures for ensuring email records are captured and preserved, including when hardware or software is upgraded. The Agency does not have a final policy or procedures regarding the capture and preservation of non-email electronic records and has identified some technical limitations with regard to capturing certain types of electronic messages.

8. Is your agency using or exploring cognitive technologies to identify records and distinguish between temporary and permanent retention?

Note: Cognitive technologies generally describe automated technologies that can be applied to recordkeeping practices and procedures. These include Artificial Intelligence, Robotic Process Automation, Software Robot or Bot, and other machine learning technologies.

- Yes
- No

Do not know

Please explain your response. (If Yes, include details on both methods and tools being explored, the level of accuracy and how that level is determined.)

The FEC is not currently using or exploring the use of cognitive technologies to identify records and distinguish between temporary and permanent retention.

9. Do you as SAORM regularly oversee and evaluate the effectiveness of your records management program and its compliance with statutes and regulations?

Yes

No

Do not know

Please explain your response including what specific measures you have incorporated into the SAORM role.

As SAORM, I regularly oversee and assess the effectiveness of the FEC's records management program and its compliance with statutes and regulations. While I have not incorporated specific measures for evaluating the program into my role, I keep abreast of any changes in statutory or regulatory requirements for federal records management and meet regularly with the ARO to discuss ongoing records management program initiatives and progress toward meeting new or amended statutory and regulatory requirements.

10. Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?

Yes

No

Do not know

Please explain your response and include any comments on existing, pending, and future topics.

11. Do you have any suggestions for how NARA can better engage with you and your program in your role as SAORM?

Yes

No

Do not know

Please explain your response and include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions.