



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: Kimberly D. Bose
- Position title: Commission Secretary
- Address: 888 First 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 indicate any that are new or have been changed due to reorganization or other circumstances.

The Federal Energy Regulatory Commission (FERC)

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.)

During the COVID-19 Pandemic, the FERC was on telework status for a little over two years. During that time, it was proven that we could conform to a paperless and e-government which included and resulted in the creation, receipt, and preservation of electric records and e-records management.

The agency has adopted a one day a week on-site policy, where employees work from home three to four days a week. This policy has effectively contributed to and shown that the FERC is capable of creating, implementing, and maintaining electronic processes for our business operations.

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 FERC permanent records are created and received in electronic formats.

An agency-wide permanent records assessment was done in October 2022 to identify any permanent records in analog formats and in the custody of FERC Program Offices/staff.

All physical formatted permanent records that are eligible for transfer to the FRC and NARA will be transferred by June 30, 2024.

All physical formatted permanent records that are not eligible for transfer to the FRC and NARA will be converted to an e-format with appropriate metadata by June 30, 2024.

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 FERC is currently working to meet the goal to manage and preserve all temporary records in an electronic format by June 30, 2024. The agency has awarded a digitization contract (February 2022) to ensure all of our active and long-term temporary records stored on aperture cards, microfilm, and microfiche are properly managed and preserved in an e-format throughout its' lifecycle. This digitization effort will be completed in the fall of 2023.

4. 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 FERC does not have an agency-operated records storage facility. We have a Records Maintenance Center where we maintain temporarily withdrawn record boxes from the FRC until the records have been copied/digitized and provided to requestors. Once the records have been provided they are immediately returned to the FRC.

5. 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 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 which contributes to Federal Records Management compliance, goal attainment, 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 and Manages all of FERC Data, Both Structured and Unstructured, Throughout the Data Lifecycle
 - **Records Management** - Participates 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 develops standards and practices in the evaluation, 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 modernizing our eLibrary Information System to ensure it meets the Federal Electronic Records Management regulations for e-records management. Our IT department along with the IBM Enterprise Records Team (CTR) is currently working 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. The FERC will re-submit the NA-1-005 by April 30, 2023.
 - Collaboration is a continuous and much needed 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 (SORNS).
 - **FOIA** - Collaborates with the FOIA Officer/office on records access and records of interest.

6. 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 FERC employs the capture and storage of emails in an archiving system, shared drives and personal drives, and cloud services with records management capabilities. When hardware or software is upgraded notification is disseminated.

7. 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.)

Examples of some of our Robotic Process Automations (RPA):

- Data Migrations
- Information System Access
- Virtual Helpdesk Operations
- Record Transfers

8. 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.

- Established a direct pipeline to the ARO, meets regularly with the ARO and on an Ad-Hoc Basis.
- Ensures compliance with NARA requirements for electronic records management including:

-
- Managing all permanent electronic records electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format
 - Steadily working towards compliance with M-19-21 and M-23-07
 - Promotes effective records management at a senior level during senior management meetings and as needed
 - Promotes effective records management at the agency level
 - Ensure necessary funding is allocated and available to support the records management program
 - Maintains an effective and consistent records management program for the management of the agency records

9. 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.

10. 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.