



*Senior Agency Official for Records Management
Federal Trade Commission
2018 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.

The reporting period begins on March 11, 2019 with reports due back to NARA no later than April 19, 2019.

NARA plans to post your 2018 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 progress through December 31, 2018.
- 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 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: Valerie Green
- Position title: Chief Administrative Services Officer
- Address: 600 Pennsylvania Ave., NW, Washington, D.C., 20580

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.**

Please provide list:

All Bureaus and Offices of the Federal Trade Commission (FTC).

2. **Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)**

- Yes
 No

Please explain your response:

The FTC 2018-2022 Strategic Plan establishes agency Strategic Goal 3: Advance the FTC's performance through excellence in managing resources, human capital and information technology. FTC developed the performance goal, "Percentage of permanent records that are managed electronically," and met the target of 100 percent.

3. **Has your agency implemented a plan that aligns to the criteria and requirements published by NARA in its [Criteria for Successfully Managing Permanent Electronic Records](#) (March 2018)?**

- Yes
 No

Please explain your response:

Key 2018 accomplishments that align with the NARA Criteria include:

- Prioritize and Allocate Resources; Institute Policies: The agency incorporated records and information management performance goals in its 2018-2022 Strategic Plan.
- Institute Policies: The agency prepared a draft update to its Records and Information Management policy.

- Prioritize and Allocate Resources: FTC hired an additional records management staff, with NARA records management certificates, to enhance the agency’s programmatic capacity.
- Evaluate Program and Processes; Train Records Custodians: In FY18, the agency Records Officer conducted three records management site evaluations, prepared written assessments concerning the disposition of records and nonrecords in accordance with the FTC records schedule and the GRS; and provided records-related training to personnel.
- Review Records Schedules: National Archives and Records Administration’s (NARA) Electronic Records Division (ERD) established in FY18 that the FTC manages its permanent electronic records through Documentum (DocSmart) and its records indexing system, the Matter Management System (MMS).
- Maintain Systems: The agency ensured that the agency’s permanent electronic records, maintained in the DocSmart system, are protected from unauthorized access, alteration, or concealment, and that records can be retained until after transfer to NARA has been fully completed.
- Prepare for Transfer; Execute Transfer: The agency worked with NARA archivists on the transfer of over 1,300 boxes of permanent paper records stored in the NARA Federal Records Center (FRC) system, and began test procedures in order to transfer permanent electronic records to the National Archives.

4. As included in the Administration’s [Delivering Government Solutions in the 21st Century: Reform Plan and Reorganization Recommendations](#) (June 2018), NARA will no longer accept paper records after December 31, 2022. Is your agency developing strategic plans, goals, objectives, and initiatives that will enable it to comply with this deadline?

The Reform Plan states:

Transition to Electronic Environment: Transition Federal agencies’ business processes and recordkeeping to a fully electronic environment, and end the National Archives and Records Administration’s acceptance of paper records by December 31, 2022. This would improve agencies’ efficiency, effectiveness, and responsiveness to citizens by converting paper-based processes to electronic workflows, expanding online services, and enhancing management of Government records, data, and information.

- Yes
- No

Please explain your response (include specific goals and example metrics):

Yes, the FTC has developed various goals to ensure that it will meet this deadline. As background, the FTC has paper records stored in two off-site storage locations, with over 18,000 boxes in the FRC system and over 40,000 boxes in Iron Mountain.

The FTC published an addendum to its 2018-2022 Strategic Plan that added a new records management performance goal that focuses on paper records. FTC performance goal 3.3.4 requires the agency to reduce annually the amount of FTC paper records held in NARA FRC

storage to zero by December 2022. Showing progress towards this goal, in 2018 the FTC transferred over 1,300 boxes of permanent paper records out of the FRC system to the custody of the National Archives. FTC records management staff and NARA archivists also analyzed a statistical sample of over 2,800 remaining boxes coded by FTC as permanent, and confirmed the need to recode these boxes as temporary.

This permanent paper records transfer project has allowed the FTC to establish a repeatable process for the disposition of the remaining 16,791 boxes held in NARA FRC. Applying this same process, the FTC also will be able confidently to determine what can be transferred and what can be destroyed at Iron Mountain. While the agency is moving expeditiously to evaluate and dispose of or transfer all its paper records holdings, FTC anticipates needing to digitize certain permanent paper records stored in Iron Mountain after the 2022 deadline, due to the large quantity of holdings there.

The FTC supports electronic workflows and currently manages its permanent records electronically. Specifically, FTC supports the transfer of electronic records through 2018-2022 Strategic Plan performance goal 3.3.5, which states that the FTC will successfully transfer permanent electronic records dated between 2004 and 2016 to NARA.

5. Is your agency utilizing [General Service Administration's Schedule 36](#) to procure solutions to assist in transitioning to an Electronic Environment?

- Yes
 No

Please explain your response:

The agency procured physical and electronic records management solutions prior to FY18; therefore, the procurement of new physical and electronic records management solutions in FY18 was not needed.

6. Have you, as the SAORM, established or improved your agency procedures that ensure all incoming and outgoing senior officials receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements?

*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
 Changes were unnecessary (click [here](#) for your agency's 2017 report)
 No, changes are being considered but have not been made
 No

Please explain your response:

In 2018, for the first time since the agency's founding, the FTC experienced a complete turnover in the Commission. The FTC Records Officer and officials from the Office of General Counsel (OGC) provided records disposition advice and guidance to the departing Acting Chairman, Commissioner, and their staff. The Records Officer and OGC also collaborated to provide the incoming Chairman, four Commissioners, and their staff:

- Updated litigation hold and FOIA instructions, including the placement and maintenance of information management holds;
- Guidelines for their Federal and agency recordkeeping responsibilities to ensure that their offices and the agency meet the requirements;
- Instructions barring the use of personal email accounts to conduct agency business and requiring the transfer within 20 days of any emails received pertaining to their Federal work received on their personal accounts to their FTC email account.

The Records Officer also provided instructions and hands-on support to the outgoing Acting Chair, Commissioner, and their staff, including assistance in identifying records, transferring records into the custody of the Records & Information Management Office for preservation, and disposing of nonrecords.

7. Have you, as the SAORM, ensured that your records management program has the support and resources it needs to be successful? (See [NARA Bulletin 2017-02: Guidance on Senior Agency Officials for Records Management](#)) - SAORMs must identify and advocate for the financial, personnel, and technological resources necessary to ensure that adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency are preserved and usable for as long as needed to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities.

When planning resources, SAORMs must consider:

- Mission, size and structure of the agency;
- Volume and format of records associated with the primary mission;
- Risks associated with the management of that information; and
- Information resources, including planned investments in information technology that affect the management and preservation of records.

- Yes
 No

Please explain your response:

FTC's SAORM has ensured that records management has been incorporated into the FTC's IT Information Resources Management (IRM) Plan and the agency's strategic plan. The SAORM also participates in the senior levels of budgeting and planning for the agency. Two new records management performance goals were specifically incorporated as part of the agency's 2018-2022 Strategic Plan to help emphasize the importance of records management work at the FTC. The SAORM sits on the FTC's Senior Management Council (SMC), which reviews and votes on the IRM yearly. The SMC helps the agency identify and work to avoid or accept risk, including the risk of records loss or records management non-compliance. In 2018, the agency also drafted an update to its Records and Information Management policy for final approval in 2019. Finally, FTC's SOARM helped ensure that the Records and Information Management office was able to hire additional personnel.

8. Have you, as the SAORM, implemented an appropriate role-based records management training program that covers recordkeeping responsibilities for all staff including those with dedicated records management roles, Federal employees, contractors, senior executives and appointees? (See [NARA Bulletin 2017-01: Agency Records Management Training Requirements](#))

Role-Based Training:

Agencies should offer records management training specific to the needs of the following groups:

1. Senior level agency officials and political appointees;
2. Records professionals at all levels within the organization;
3. Managers and supervisors;
4. Acquisition, contracting, and procurement personnel;
5. Attorneys engaged in litigation or advising on records or access to information issues;
6. Personnel developing and managing IT systems and applications; and
7. Continuity of Operations and Disaster Preparedness personnel that manage mission essential records.

Yes

No

Please explain your response:

The FTC is a small agency comprised mostly of attorneys and economists, but the additional records staff capacity has enabled the FTC to expand role-based training in 2019. There is dedicated training for senior officials and their staff when on-boarded and off-boarded. FTC's COOP Program is run by a single individual who has been provided vital records information and training. Records staff are in the process of developing a robust Records Liaison Program in FY19, which will include specific role-based training for records professionals. FTC conducts records-related training via yearly privacy/security training, and there are intranet tip sheets available to everyone, some of which are tailored to specific Bureaus' and Offices' needs.

9. Have you, as the SAORM, taken steps to direct and support Records Management staff in implementing an evaluation or auditing process to ensure records management directives, policies, procedures, and retention schedules are being properly implemented?

- Yes
 No

Please explain your response:

The FTC has taken steps toward implementing an evaluation process by completing the evaluation of three FTC regional office sites in FY18 and submitting written reports summarizing its findings. The Records Officer assessed the disposition of, and provided training on records and nonrecords in accordance with the FTC records schedule and the GRS.

10. Do you need support from NARA to ensure a successful transition to fully electronic recordkeeping?

- Yes
 No

Please explain your response:

Ongoing support from NARA is greatly appreciated. NARA's appraisal archivist assigned to the FTC, NARA archival records staff, and NARA FRC staff provided extensive support and guidance in FY18 during the FTC's efforts to implement a modern records management program. These efforts included the transfer of permanent paper records from the FRC system to the National Archives, the determination that the FTC DocSmart system contains the official permanent records of the Commission from 2004 to the present, and the beginning of the disposition process for the remaining FTC temporary records in FRC storage.