



## *Senior Agency Official for Records Management 2020 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. This year's SAORM report provides an opportunity for agencies to report on plans and progress towards the milestones and target goals in this memorandum, as well as other important records management initiatives.

The reporting period begins on January 19, 2021, and reports are due back to NARA no later than March 19, 2021.

NARA plans to post your 2020 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 both records management program developments towards the transition to electronic recordkeeping outlined in M-19-21 through December 31, 2022, 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 2020 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 Avenue, NW, Washington, DC 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 provide a list, and also indicate any that are new or have been changed due to reorganization or other circumstances.*

The Federal Trade Commission (FTC)

**2. Has the COVID-19 pandemic changed any 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):*

No, COVID-19 did not change any policies or practices in the records management program of the FTC.

**3. Does your agency have an established information governance framework that connects records management, data management, and other agency information lines of business? (A relationship between CIO, CDO, SAORM, DRO/ARO, RM Staff)**

- Yes
- No
- Do not know

*Please provide details on what support is needed:*

Yes. In FY2020, the FTC Chairman designated the Chief Information Officer (CIO) as the management official that, among other things, “provides leadership and oversight for information governance subject to the concurrence of the Office of General Counsel and Senior Agency Official for Records Management (SAORM) and exercises expertise and judgment in determining how to implement records preservation and transfer using authorized information technology (IT) information systems.” The memo also notes that the CIO also serves as the

Chief Data Officer (CDO). The CDO chairs the FTC's Data Governance Board, on which the SAORM serves as a member along with other senior agency officials.

The Agency Records Officer is connected to this work via the SAORM, engages in information governance meetings and discussions, and provides leadership and guidance to records management staff via the FTC's network of Records and Information Liaisons.

**4. Has your agency made progress towards managing 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 and example metrics):*

Yes. As previously reported, the FTC has two records management measures that are published in the FTC Strategic Plan 2018-2022, FTC 2018-2022 Strategic Plan, and their corresponding performance goals, FTC 2018-2022 Strategic Plan Addendum.

Per the May 2020 NARA FTC disposition freeze order, the FTC is in the process of inventorying electronic systems and developing records schedules for systems that may contain permanent electronic records.

**5. Has your agency made progress towards managing 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 and example metrics):*

Yes. The FTC manages its temporary administrative/housekeeping records, e.g., payroll, in electronic format. The agency is making progress toward the management of its mission-related temporary electronic records through implementation by the agency's regional offices of a standardized file structure in shared drives. The FTC Records and Information Liaison program provides support for the management of temporary electronic mission-related records and non-records in the agency's headquarters and regional offices.

Per the May 2020 NARA FTC disposition freeze order, the FTC is in the process of inventorying electronic systems, identifying temporary records that are covered by the NARA General

Records Schedules (GRS), and developing records schedules for systems that may contain temporary electronic records not covered by the GRS.

**6. Is your agency investing resources in IT to support the transition to electronic recordkeeping?**

- Yes
- No
- Do not know

*Please explain your response. If Yes: Please include specific examples of resources and how this will support records management processes. If No or Do not know: Please explain.*

Yes. Per M-19-21, the FTC continues to consider cost-effective opportunities to transition related business processes to an electronic environment. While the FTC has not yet procured an enterprise-wide dedicated recordkeeping system, the FTC has started to invest IT resources to support the transition to the electronic management of legal case files and associated metadata through the agency's build and implementation in FY2020 of the Matter Record Search (MaRS) system and the E-Filing system. The MaRS system maintains electronic case files in NARA-specified formats and the E-Filing system allows for the electronic filing of case records. The agency also is continuing the steady development of new records disposition schedules for electronic systems.

The FTC's primary challenge to achieving higher levels of maturity is the need to make financial investments in electronic records management systems.

**7. To meet the requirements of M-19-21, 1.3, related to records storage facilities, does your agency have plans to use commercial storage to replace agency-operated records centers and NARA Federal Records Centers by December 31, 2022? (M-19-21, 1.3)**

- Yes
- No
- Do not know

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

Yes. The FTC has used a commercial vendor for records storage since 2000. The FTC no longer sends records to a NARA Federal Records Center (FRC). The FTC does have some records stored in the FRC system. Prior to the May 2020 NARA FTC disposition freeze order, the FTC was in the process of reviewing its records contents in the FRC system and issuing disposition instructions.

The FTC plans to finish its review and disposition of the records in the FRC system after the NARA FTC disposition freeze is lifted.

**8. Does your agency have policies and procedures that include documentation to ensure records of newly appointed and outgoing senior officials\* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?**

\*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

No

Do not know

*Please explain your response (include specific details of policies and procedures):*

The FTC Records and Information Management (RIM) program, the Office of the CIO, and the Office of the General Counsel consult directly with departing Commissioners and their staff on the proper management of FTC records, ensuring to the greatest extent possible that records, including electronic records and email, are properly captured and/or processed and not improperly removed, altered, or deleted. Additional consultations for other officials and staff were conducted on an ad-hoc basis in FY2020. This consultative process is captured as part of the agency's standard documented check-in/check-out processes.

In FY2020, the agency continued to provide guidance on what constitutes a record that must be preserved by departing employees and senior officials through verbal communications and written information on its intranet website and in the agency's policy manual. In FY2021, the FTC RIM program expanded its consultative process to include additional staff in accordance with the NARA definition of senior officials.

In FY2021, the FTC drafted a procedure that includes a departure checklist for tracking and documenting briefings with departing senior officials. The draft form was tested and the FTC anticipates finalizing the procedure by the end of FY2021.

**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):*

Yes. Like other small agencies, the FTC is working to determine how to incorporate records management controls in the full lifecycle of electronic information systems. The FTC is taking steps to incorporate records management requirements into system planning, procurement, data migration, and life cycle processes, but efforts are complex, multi-year, and resource-dependent.

The FTC manually manages most of its electronic records management processes, such as declaration, capture, organization, security, access and retrieval, monitoring, preservation, and the management of backups of systems and files for permanent and temporary records.

Per the May 2020 NARA FTC disposition freeze order, the FTC is in the process of inventorying electronic systems, identifying temporary records that are covered by the NARA General Records Schedules (GRS), and developing records schedules for systems that may contain temporary electronic records not covered by the GRS. The execution of disposition is contingent on the agency's development and NARA's approval of new FTC records disposition schedules for mission and policy records.

**10. Do you have suggestions for NARA to improve its engagement with you as the SAORM?**

Yes

No

Do not know

*Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):*

Yes. The FTC greatly appreciates NARA's ongoing support. As a small agency, FTC would appreciate NARA continuing to provide even more templates, examples, and sample policies and procedures that can be tailored to individual agency needs.

The FTC appreciates the work of the NARA Federal Electronic Records Modernization Initiative team, including its work with GSA on the expansion of the procurement of e-services and solutions, as well as the work of the NARA MS 365 team and the advice, guidance, and examples of lessons learned it provides.