



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. 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: April Tabor
- Position title: Secretary of the Federal Trade Commission
- 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 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):

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 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.

Currently, the SAORM serves on the Data Governance Board with the CPO and CIO/CDO. The RM Division is strengthening relationships with OCIO through regular meetings. There is positive progress toward further integration of these lines of business.

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 FTC has not established the ability to manage and preserve permanent electronic records with appropriate metadata. The FTC is under a records disposition freeze and the agency needs to continue to identify and schedule permanent records. Once complete, then the agency can determine metadata requirements. The permanent records that are scheduled are maintained electronically and Records Management is working with NARA and OCIO regarding appropriate metadata. The FTC is making progress on this goal but will not meet the deadline.

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 FTC is still writing new record schedules to resolve the NARA freeze order. Not all schedules will be written, let alone approved, by the December 31, 2022 deadline. Instances where work processes rely on paper are subject to the General Records Schedule and will take additional planning and resources to transition to electronic records.

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 FTC will need to submit a request for an exception. The effort to move to electronic records was interrupted by COVID and the records disposition freeze that requires new schedules be written. The Agency is still creating and maintaining a significant volume of paper records and will not be able to fully transition to electronic records by December 31, 2022.

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.

We are identifying the feasibility of utilizing GSA SIN 518210 ERM to procure solutions to assist in transitioning to an electronic environment.

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 FTC does not need to develop a plan because the agency does not have its own agency-operated records storage facility. The FTC has used a commercial vendor for records storage since 2000. The FTC has not sent new storage transfers to the NARA Federal Records Center (FRC) since 2000.

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. 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):

NARA can assist in creating a community for SAORMs to connect and interact with one another. There are very few emails from NARA directed towards SAORMs. NARA frequently forwards information of interest to SAORMs to the AROs. However, AROs often do not have the resources to make or implement large changes within the agency while the SAORM does. A way for SAORM's to connect and discuss how to implement changes and achieve goals would be beneficial. NARA needs to better facilitate the process to achieve goals and not just deliver goals, leaving agencies to work it out alone.