



## *Senior Agency Official for Records Management 2023 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 8, 2024, and reports are due back to NARA no later than March 8, 2024.**

NARA plans to post your 2023 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.

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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](mailto:rmsselfassessment@nara.gov). Include the words “SAORM 2023 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: Alisa Cottone
- Position title: Director, Workplace Solutions Department

**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.*

Pension Benefit Guaranty Corporation

**2. Will your agency 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  
 Not applicable, all records are in electronic format

*If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)*

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PBGC has transferred electronic permanent records through the annual move but, in future, will use direct offers within the ERA system. PBGC plans to test this process in 2024 but may not meet the June 30 deadline. PBGC plans to modernize the capture and retention of Capstone Officials' emails in 2024 and will test the transfer process with NARA within the next 1-2 years; according to our records no permanent records of this type are scheduled for transfer in 2024. This modernization activity is dependent upon our collaboration partners in IT.

**3. Will your agency 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  
 Not applicable, all records are in electronic format

*If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)*

PBGC is working on an activity to map metadata to retention policies in the O365 environment; this activity will not be complete by the June 30, 2024 deadline. A system assessment commenced in 2023 and final results are expected in Q3 of CY 2024. Based on this assessment, a plan of action will be developed to address findings and recommendations in other recordkeeping systems; these plans will not be fully implemented by June 30, 2024. PBGC has developed a digitization plan to replace analog records with digital copies, according to NARA's digitization requirements; these activities will not be complete by June 30, 2024. PBGC will submit a M-23-07 exception to account for the continued management of paper records currently stored at FRCs and commercial records storage facilities as well as paper records received and managed through a mission-essential process.

**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 by June 30, 2024? (Choose all that apply)**

- Yes  
 No  
 Not applicable, my agency does not have agency-operated records storage facilities  
 Not applicable, all records are in electronic format

*If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)*

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**5. Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 and transfer inactive records to a NARA Federal Records Center (FRC) or commercial storage facilities by June 30, 2024? (Choose all that apply)**

- Yes, we will transfer to the FRC  
 Yes, we will transfer to commercial storage facilities  
 No  
 Not applicable, all records are in electronic format

*If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)*

**6. Does your agency have a Data Management Strategy that includes records management principles? (<https://www.archives.gov/files/records-mgmt/resources/cdo-rm-assessment-report.pdf>)**

- Yes  
 No

*Please explain your response.*

PBGC is working on a project to categorize data and information in our recordkeeping systems. Once complete, this activity will generate documentation that includes records management principles.

**7. In your role as SAORM, do you meet with your Agency Records Officer(s) to discuss the agency records management program's goals?**

- Yes  
 No  
 Not applicable, my agency does not currently have a designated Agency Records Officer

*Please explain your response. (If 'Yes,' please include how often, a description of topics, and outcomes of these meetings. If 'No,' please explain why not.)*

Yes, I meet with the ARO monthly to receive program updates and review risks and issues for escalation. I also attend the program's agency-wide briefings frequently throughout the year. In 2024, I will attend the Records Coordinator meetings as often as possible.

**8. Has your agency incorporated NARA's digitization standards into your Information Resource Management (IRM) Strategic Plan? (44 U.S.C. 3506(b)(2) and OMB Circular A-130)**

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- Yes  
 No  
 Not applicable, my agency is not currently digitizing records

*Please explain your response. (If 'Yes,' what steps have been taken? If 'No,' why not?)*

The agency has appointed a Chief Data Officer and a Data Governance Board who is tasked to: Manage PBGC's data assets to include, data format standardization, data sharing, **records management**, and data publishing ([PBGC Strategic Plan FY2022-FY2026](#)); including NARA's digitization standards has not been discussed. A-130 compliance is reported annually, and the Agency Records Officer is required to submit status of requirements involving records management; the agency reporting tool includes only what is stated in A-130 and does not address NARA's digitization standards.

**9. Does your agency have a social media strategy that includes capturing and maintaining records in accordance with records management statutes and regulations?**

- Yes  
 No

*Please explain your response.*

In reviewing COLA's social media section of their Records Management procedures manual, their assessment, and conversation during their staff meeting, I am not satisfied that these records are maintained properly, and this is something that will be addressed in 2024.

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

- Yes  
 No

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

To ensure records management requirements are met at a consistently satisfactory level across the enterprise, it would be helpful if NARA provided specific policy and/or guidance to agencies on what constitutes "adequate funding" for records management program support resources and activities. Our experience indicates that records management activities at our agency are prioritized against other mission-essential activities and may not be consistently performed at the department level or comprehensively meet regulatory requirements due to a lack of dedicated and/or

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knowledgeable resources. Justification for resource funding to support a mature, efficient, and engaged records management program would benefit from an authoritative statement on this concern.