



*Senior Agency Official for Records Management  
2017 Annual Report*

The [OMB/NARA Managing Government Records Directive \(M-12-18\)](#) requires Senior Agency Officials for Records Management (SAORM) to provide an annual report to NARA. This report demonstrates how your organization is achieving the goals of the *Directive* and other important initiatives as identified by NARA.

NARA uses the reports to determine the overall progress of the Federal Government in meeting the goals of the *Directive* transitioning to electronic recordkeeping. Additionally, NARA uses the report for information sharing purposes to provide best practices and model solutions with Federal agencies.

The reporting period begins on January 8, 2018 and reports are due back to NARA no later than March 16, 2018.

NARA plans to post your 2017 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, 2017.
- 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 [PRMD@nara.gov](mailto:PRMD@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: Barry Walters
- Position title: Director, Office of Support Operations
- Address: 100 F Street NE, Room SP 2-2705  
Washington, DC 20549
- Office telephone number: 202-551-6395

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM?**

*Please provide list*

The U.S. Securities and Exchange Commission (SEC)

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 Office of Records Management Services (ORMS) issued SEC-wide guidance to ensure all SEC divisions and offices create and/or maintain records in a manner that meets this requirement. The guidance includes a list of NARA's acceptable electronic formats and steps to take before transferring permanent records to NARA.

ORMS works with the Office of Information Technology (OIT) and the Office of Acquisitions to incorporate records management requirements into the systems development lifecycle, and issued standard language to include in all contracts involving the procurement of electronic information systems (EIS) that capture and maintain SEC records.

ORMS ensures the file plans and existing records schedules of the agency's divisions and offices are current and accurate, and recommends corrective action plans for any identified deficiencies. ORMS also works directly with the divisions and offices to guarantee records schedules are submitted to NARA as needed.

3. **Has your agency developed plans or taken actions to evaluate and implement the digitization of permanent records created in hard copy or other analog formats (e.g., microfiche, microfilm, analog video, analog audio)? (M-12-18 Goal 1.1)**

Yes

No

*Please explain your response and include any obstacles you are facing in planning or implementing digitization initiatives.*

As business processes evolve, ORMS remains focused on supporting the divisions and offices to ensure all permanent SEC records created in hardcopy and analog formats are electronically captured and retained in a manner that is acceptable for accessioning to NARA. To achieve this, ORMS collaborates with staff to identify, catalog, and properly schedule records in all formats, including those maintained in an EIS.

ORMS also requires the series media type for all new records schedule submissions that are proposed as permanent be designated as electronic, unless there is a regulatory requirement or legitimate business need for maintaining the records in a non-electronic format.

ORMS works with system development teams to ensure the full lifecycle management of record data—including end-of-cycle disposition actions—is built into system and process designs. In addition, ORMS provides OIT project managers with baseline records management requirements to use for all EIS initiatives that will contain records.

In addition, ORMS issued SEC-wide guidance to ensure all divisions and offices that create, receive, and/or maintain records meet these requirements. This guidance includes a list of NARA's acceptable electronic formats, as well as steps that divisions and offices must take prior to transferring permanent records to NARA.

- 4. OMB M-17-22 required agencies to create reform plans that may result in re-organizations and the elimination of offices and/or functions. Where necessary, has your agency taken steps to ensure that recordkeeping requirements and other records management needs have been or will be accounted for and implemented when making these changes?**

Yes

No

*Please explain your response:*

ORMS ensures the file plans and existing records schedules of the agency's divisions and offices are current and accurate, and recommends corrective action plans for any identified deficiencies. ORMS also works directly with the divisions and offices to guarantee records schedules are submitted to NARA as needed.

- 5. Have you, as the SAORM, taken steps to ensure that your records management program has the strategic direction, support and resources it needs to be successful? (see: NARA Bulletin**

Yes  
 No

*Please explain your response*

The Records and Information Management Strategic Plan summarizes the goals of ORMS and provides the strategic framework for planning, managing, and delivering information for all aspects of SEC records management in an effective and efficient manner. The core purpose is to use the SEC's records and information assets to increase productivity, reduce costs, and meet legal requirements in service to the agency's mission and strategic goals. The strategic plan, at its highest level, lays out three major goals to ensure the SEC maintains compliance with applicable federal laws related to records planning, controls, training, and other activities involved with records creation, maintenance and use, and disposition. The strategic plan also serves to achieve adequate and proper documentation of the policies and transactions of the SEC, as well as effective economical management of agency operations.

**6. Have you, as the SAORM, ensured that 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  
 No

Please explain your response:

All SEC staff, including senior officials, are required to complete formal records and information management training, and all senior officials are notified via written communications and provided verbal briefings as required regarding their records management responsibilities as Capstone Officials.

All departing SEC personnel—regardless of the type or duration of their appointment—must provide formal acknowledgement that they followed instructions within the SEC's Removal of Records and Non-Public Information by Departing SEC Personnel directive and did not remove documentary materials upon separation without obtaining the proper permissions or approvals. Personal materials (i.e., those solely for personal use and unrelated to agency business) need to be

clearly labeled and maintained separately from office files. If information about personal matters and SEC-related business appear in the same document, it should be copied with the personal information deleted. The remaining, redacted document should be treated as a federal record. If a document does not qualify as a personal file, or if an individual is unsure whether a document is a personal file, he or she is required to consult with ORMS and, as appropriate, with the Office of the General Counsel and the Office of the Ethics Counsel before removing or disposing of the document.

**7. Is the records management program and related requirements included in your agency's Information Resource Management Plan or an equivalent information management plan? ([OMB Circular A-130, Managing Information as a Strategic Resource](#))?**

Yes

No

Please explain your response:

The Commission ensures its records are managed and treated as information resources in accordance with OMB Circular A-130. The SEC's Records and Information Management Program is governed by SEC Administrative Regulation (SECR) 7-1, which prescribes policies and procedures regarding the creation, organization, maintenance, use, and disposition of all SEC records. ORMS also conducts biennial assessments and regular reviews of the program's activities and business practices to identify gaps, and maintains processes and procedures that are consistent with the requirements in OMB Circular A-130 and in compliance with all other federal regulations and SEC policies.

**8. What policies, guidance or support do you need from NARA to ensure a successful transition to fully electronic recordkeeping? (NARA Strategic Plan, Goal 2.4)**

The SEC does not require additional policies, guidance or support from NARA at this time.