



Senior Agency Official for Records Management 2019 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 13, 2020, with reports due back to NARA no later than March 13, 2020.

NARA plans to post your 2019 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, 2019.
- 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 2019 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

- 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:

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

- 2. Is your agency managing all permanent electronic records in electronic format as of December 31, 2019? (M-19-21, 1.1)**

- Yes
 No

Please explain your response:

The Office of Records Management Services (ORMS), which I oversee under the umbrella of the Office of Support Operations, issues SEC-wide guidance to ensure all agency 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.

Within this context, 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 issues standard language to include in all contracts involving the procurement of electronic information systems (EIS) that capture and maintain SEC records.

Additionally, 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 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

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

My ORMS team 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.

My team also 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 and the associated metadata.

4. Has your agency made progress towards managing all temporary records in electronic format? (M-19-21, 1.3)

- Yes
 No

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

As business processes evolve, my ORMS team remains focused on supporting SEC divisions and offices to ensure all temporary agency records created in hardcopy and analog formats are electronically captured and retained in a manner that will meet the mandate of M-19-21, 1.3.

As such, ORMS works closely with OIT to identify and employ technological tools where necessary to meet these requirements. Additionally, ORMS collaborates with other SEC staff to identify, catalog, and properly schedule records in all formats, including those maintained in an EIS. ORMS also requires designating as electronic the series media type of all new temporary records schedule submissions, 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. ORMS also provides OIT project managers with baseline records management requirements to use for all EIS initiatives that will contain records.

Finally, ORMS is collaborating with all divisions and offices to ensure plans are implemented to ensure that records are created, received, and/or maintained to meet the requirement for managing all temporary records in electronic format, to include identifying current textual record holdings and where digitization efforts will be required.

5. Have you, as the SAORM, taken steps to ensure that your records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures? (M-19-21, 1.4)

- Yes
 No

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

In alignment with agency performance goals and objectives, my ORMS team has an established strategy for ongoing monitoring and review of program compliance that sets a clear system of accountability and responsibility for records management.

ORMS also conducts a thorough assessment of each SEC division and office records management program every two years. When deficiencies are identified, the responsible division or office must prepare a corrective action plan, track progress on a quarterly basis, and report completion when resolved.

As part of its Records Assessment Action Plan, ORMS requires agency-wide Records Liaisons to review and update file plans, essential records lists, and records inventories annually.

Additionally, 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.

Finally, ORMS conducts yearly reviews of records management policies/guidance to incorporate changes in technology and/or compliance requirements.

6. If applicable, have you identified all agency-operated records centers and made plans to either close them before 2022, or have you submitted a request to NARA for an exception? (M-19-21, 1.3)

- Yes
 No

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

Not applicable.

7. Does your agency have procedures that include documentation to ensure records of 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

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

I ensure that all SEC personnel, including senior officials, complete formal records and information management training, and all senior officials are notified via written communications and provided on-demand verbal briefings regarding their Capstone Officials responsibilities.

Additionally, all departing staff—regardless of the type or duration of their appointment—must formally acknowledge that they followed instructions within the agency’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 agency-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.

8. Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?

Yes

No

Please explain your response (include details of specific challenges, if applicable):

Currently, there are existing regulatory requirements and/or legitimate business needs for maintaining certain SEC records in non-electronic formats.

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

Yes

No

Please provide details on what support is needed:

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