



*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: Olivier Girod
- Position title: Acting Director, Office of Support Operations
- Address: 100 F Street NE, Room SP 2-2708

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

**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):*

The Office of Records Management Services (ORMS), which I oversee under the umbrella of the Office of Support Operations (OSO), issued guidance to SEC staff on managing records while working from home. This guidance reinforced previous guidance and training for SEC staff as the agency operated in a mandatory telework posture during the pandemic. Additionally, COVID-related FRC and off-site storage closures limited the availability to access some paper-based records requiring adjustments to some ORMS customer services.

**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:*

My ORMS team plays a key role within the framework connecting records management with data management, information technology, information access, acquisitions, and the Office of General Counsel (OGC). Several examples of this framework in practice includes, ORMS working in close consultation with the Office of Information Technology (OIT) to ensure that records management requirements are embedded throughout the entire systems lifecycle; coordinating with the Office of Acquisitions (OA) to modify contract language to include recordkeeping requirements in the procurement of electronic information systems (EIS); and, the Agency Records Officer working along lines of business to ensure SEC records schedules and file plans remain current with assistance from an established network

of Division and Office record 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)**

**X Yes**

No

Do not know

*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 OIT and the OA to incorporate records management requirements into the Service Delivery Framework (SDF), and issued standard language to include in all contracts involving the procurement of EIS that capture and maintain SEC records and associated metadata.

**5. Has your agency made progress towards managing all temporary records in an electronic format by December 31, 2022? (M-19-21, 1.3)**

**X Yes**

No

Do not know

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

My ORMS team 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 all new temporary records schedule items to be 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. 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 so that records are created, received, and/or maintained to meet the requirement for managing all temporary records in electronic format. This includes identifying current textual record holdings and identifying where digitization efforts will be required.

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

**recordkeeping?**

**X 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.*

The SEC continues to prioritize investments in IT to support the transition to electronic recordkeeping. Investments in enterprise recordkeeping solutions, such as Microsoft Office 365 and other mission-specific information management applications, as well as processes designed to ensure that records management requirements are embedded throughout the entire system lifecycle, demonstrate the SEC's continued investment in IT to transition to electronic recordkeeping.

- 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)**

**X Yes**

No

Do not know

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

Currently, there are existing regulatory requirements and/or legitimate business needs for maintaining certain SEC records in non-electronic formats. To manage these records, the SEC will continue to use commercial storage after December 31, 2022.

- 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.**

**X Yes**

No

Do not know

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

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.

The emails of newly appointed and outgoing senior officials are captured in accordance with SEC policies and procedures. Emails of Capstone and Non-Capstone officials are stored and remain accessible in accordance with the SEC’s approved NA Form 1005 and the SEC’s NARA-approved schedule for *E-mail Records of Non-Capstone Officials of the SEC*

**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):*

Currently, there are existing regulatory requirements and/or legitimate business needs for maintaining certain SEC records in non-electronic formats. Regulatory reforms are required before the SEC can transition to fully electronic recordkeeping.

**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):*