



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: Olivier Girod
- Position title: Director, Office of Support Operations
- Address: 100 F Street NE

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 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):

The Office of Records Management Services (ORMS), which is a component 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. COVID-related FRC closures could impact NARA's ability to support the SEC in meeting OMB M-19-21 requirement 2.4, which states that, "by Dec. 31, 2022, NARA will no longer accept transfers of permanent or temporary records in analog formats and will accept only records in electronic format and with appropriate metadata."

- 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.

The ORMS organization 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 include ORMS working in close consultation with the Office of Information Technology (OIT) to ensure that records management requirements are embedded throughout the entire system's 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 to ensure SEC records schedules and file plans remain current with assistance from an established network of Division and Office record liaisons.

- 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):

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 also worked with OIT and 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. 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):

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 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. 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

ORMS will pursue an exception in order to allow for the continued collection of paper records and forms as required by statute. Currently, there are existing regulatory requirements and/or legitimate business needs for maintaining certain SEC records in non-electronic formats.

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

The SEC has not utilized GSA's Special Item Number for Electronic Records Management to procure solutions. The SEC has incorporated and will continue to incorporate NARA's Universal Electronic Records Management Requirements into its acquisition documents and processes in order to ensure the procurement and deployment of compliant solutions.

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.

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.

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.

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):