



## *Senior Agency Official for Records Management 2022 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 9, 2023, and reports are due back to NARA no later than March 10, 2023.**

NARA plans to post your 2022 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 2022 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: 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 indicate any that are new or have been changed due to reorganization or other circumstances.*

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

**2. In response to the COVID-19 pandemic, have any of the temporary adaptations to agency business processes become permanent improvements to the management and preservation of electronic records?**

- Yes
- No
- Not applicable, no adaptations were needed
- Do not know

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*Please explain your response. (If Yes, include details of the changes and why they became permanent. If No, or Do not know, please explain your answer.)*

**3. Has your agency taken action to 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  
 Do not know

*Please explain your response with specific actions taken, challenges and results.*

The SEC's 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 also worked with the SEC's Office of Information Technology (OIT) and Office of Acquisitions (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 electronic information systems (EIS) that capture and maintain SEC records and associated metadata.

**4. Has your agency taken action to 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  
 Do not know

*Please explain your response with specific actions taken, challenges and results.*

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.

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**5. 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 and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities by June 30, 2024?**

Yes

No

Not applicable, all records are in electronic format

Do not know

*Please explain your response with specific actions taken, challenges and results.*

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 June 30, 2024.

**6. Does your agency have policies and procedures that incorporate records management into the information governance (IG) framework for information, data, and other agency information management? (This includes a relationship between CIO, CDO, SAORM, DRO/ARO, Records Management (RM) Staff, Security, Privacy Officers, and FOIA)**

*Note: The incorporation of records management into information governance is part of the framework covered by [OMB Federal Data Strategy - A Framework for Consistency \(M-19-18\)](#) as it provides a vision for managing and using federal data, along with recordkeeping requirements included in [OMB Circular A-130, Managing Information as a Strategic Resource](#).*

Yes

No

Do not know

*Please explain your response and provide details about how your agency's policies enhance IG and RM's role or relationship to it.*

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 OIT to ensure that records management requirements are embedded throughout the entire system's lifecycle; coordinating with OA to modify contract language to include recordkeeping requirements in the procurement of 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.

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**7. Has your agency developed policies and procedures to ensure the capture and preservation of electronic messages, including when hardware or software is upgraded?**

*Note: Electronic messages means electronic mail and other electronic messaging systems that are used for purposes of communicating between individuals. Electronic messages that satisfy the definition of a federal record under the Federal Records Act are electronic records. This includes email, text messages, chat messages, voicemail, social media posts, and other similar applications. (See: [Email Management](#) and [CFR 1236: Electronic Records Management](#))*

Yes

No

Do not know

*Please explain your response and include details of your agency's methods to capture and preserve electronic messaging records or challenges preventing you from doing so.*

The SEC has developed policies and procedures to ensure the capture and preservation of electronic messages. These policies include the prohibition against conducting SEC business through personal accounts and restrictions on non-approved messaging applications.

**8. Is your agency using or exploring cognitive technologies to identify records and distinguish between temporary and permanent retention?**

*Note: Cognitive technologies generally describe automated technologies that can be applied to recordkeeping practices and procedures. These include Artificial Intelligence, Robotic Process Automation, Software Robot or Bot, and other machine learning technologies.*

Yes

No

Do not know

*Please explain your response. (If Yes, include details on both methods and tools being explored, the level of accuracy and how that level is determined.)*

The SEC is exploring opportunities to utilize machine learning technologies, particularly the auto-apply retention label functionality within Microsoft 365.

**9. Do you as SAORM regularly oversee and evaluate the effectiveness of your records management program and its compliance with statutes and regulations?**

Yes

No

Do not know

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*Please explain your response including what specific measures you have incorporated into the SAORM role.*

As the SAORM, I regularly oversee and evaluate the effectiveness of the SEC's records management program and its compliance with statutes and regulations. Specifically, I oversaw the SEC's 2022 Biennial Information Management Assessment Report, which was conducted in accordance with the requirements of 36 C.F.R. 1220.34 to determine the effectiveness of the SEC's records management program and opportunities to make improvements.

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

- Yes  
 No  
 Do not know

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

**11. Do you have any suggestions for how NARA can better engage with you and your program in your role as SAORM?**

- Yes  
 No  
 Do not know

*Please explain your response and include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions.*