



## ***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, which 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](mailto: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):

*Peter Bergstrom (SES)  
CFO/Associate Director for Management  
Financial Crimes Enforcement Network  
Office of Terrorism and Financial Intelligence  
U.S. Department of Treasury*

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately?**  
**Financial Crimes Enforcement Network**  
*Please provide a list, and also indicate any that are new or have been changed due to reorganization or other circumstances.*  
**No changes to report.**
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):* Although FinCEN has been affected by CoVID-19, most employees are teleworking from home. However, we managed to continue to operate and practice related to Records Management; we were able to send records to the Federal Records Center (FRC) and destroy records according to their Records Control Schedule disposition.

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.*

**FinCEN has an established information governance framework that integrates records management. We are in the process of creating the metadata for the Management Platform. The Records Office has a solid working relationship with the staff members of the CIO and SAORM. In addition, the IT department has developed the Office 365 Records Management Share Point platform. In addition, the Records Management Office needs the technical knowledge and support of the IT Project Manager to develop and deploy the site.**

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):*  
**FinCEN Records Office has identified and appointed Records Liaisons in each office and trained them on metadata and the Electronic Records lifecycle. In addition, we are in the process of developing an Office 365 Records Management Share Point site containing dedicated records folders for each division. Most employees are teleworking due to COVID-19, which has delayed our paper records inventory, disposition, and shipment to NARA. In addition, we are currently preparing to have all permanent paper records sent to the Federal Records Center or National Archives before Dec 31, 2022.**

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):*  
**The Records Office has appointed Records Liaisons in each office and trained them on metadata and the Electronic Records lifecycle. We are preparing to send all temporary paper records to the FRC before Dec 31, 2022**

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.*  
**The Records Office has appointed Records Liaisons in each office and trained them on metadata and the Electronic Records lifecycle. We are currently preparing to have all temporary paper records sent to the FRC or NARA before Dec 31, 2022**

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.*

**FinCEN is at the stage that we plan to use the General Service Administration's special Item Number for Electronic Records Management ( 518120 ERM) 6 to procure a solution to assist in transitioning to Electronic Environment.**

**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.*

**FinCEN will not use any commercial storage centers. All FinCEN official records will be electronic. Forms requiring wet signatures will be digitized and stored electronically.**

**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):*

**As the SOARM, I am confident that the Records Officer and staff would rise above any challenges to meet the M-19-21 December 31, 2022 suspense date.**

**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):*