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 rmselfassessment@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: James Strawley
- Position title: Deputy Staff Director
- Address: 1 Columbus Circle NE, Suite 2-500, Washington DC 20002

1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately?

(Parse text)

United States Sentencing Commission

2. Has the COVID-19 pandemic changed any policies or practices related to records management at your agency?

☑ Yes

☐ No

☐ Do not know

(Parse text)

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

(Parse text)

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):

The United States Sentencing Commission (“Commission”) has converted from a traditional, largely paper-based records management system to an electronic system for permanent records that will be sent to NARA. As part of this transition, the Commission undertook an effort to convert all paper-based permanent records to electronic format pursuant to its media-neutral records schedule. This was achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called “Oracle WebCenter Content”; we use an “Oracle WebCenter Content: Records” module specifically for records management. The two components collectively comprise the agency’s user-friendly records management system, known internally as “eCommission.”

As of the filing of this report, the Commission has completed the process of scanning all historical, paper-based permanent records. The Commission has also transferred its previously-created electronic files (e.g., pdf, Word, Word Perfect, Excel, and Power Point files) into the eCommission system – including all files that qualify as permanent records. Lastly, the Commission has instituted a process by which all contemporaneous permanent records are maintained and uploaded into eCommission in electronic format. The Metadata and filetype are maintained and each records also creates a PDF-A version of itself.

A similar process is also underway to achieve full digitalization of the Commission’s temporary records.

Once gathered and uploaded to eCommission, all records undergo a process to ensure proper disposition under the Commission’s records schedule. Our records specialist, Brittany Davis, is responsible for moving the documents uploaded into the eCommission from the “documents” side to the “records” side of the eCommission (if the documents qualify as “permanent” records), pursuant to our CRDS. Once a file is moved to the “records” side, it is set for disposition in accordance with the CRDS (i.e., depending on the document’s creation date, it will be sent to NARA in electronic form). An electronic copy of all records remains in the eCommission after they are sent to NARA.

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):

The digitization project in the previous answer has moved on to digitizing temporary records. The Commission has converted from a traditional, largely paper-based records management system to an electronic system for permanent records that will be sent to NARA. As part of this transition, the Commission undertook an effort to convert all paper-based permanent records to electronic format pursuant to its media-neutral records schedule. This was achieved through use of OCR-enabled scanners and scanning...
software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called “Oracle WebCenter Content”; we use an “Oracle WebCenter Content: Records” module specifically for records management. The two components collectively comprise the agency’s user-friendly records management system, known internally as “eCommission.” Pre-pandemic, the ARO was averaging 4-5 boxes of digitized records a week. Electronic temporary records are saved into a shared drive which then uploads to the ERMS or uploaded into the ERMS directly.

This system is in use for both historical, paper-based permanent records, as well as contemporaneous permanent records.

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

☐ 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 Commission has invested in OCR scanners and supporting software to digitize the records, including maintenance. We have invested in an in-house custom built ERMS system that supports storing, maintaining, and retrieving the digital records for all staff. We are constantly updating and improving both the backend for security and the front facing portion for usability.

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)

☐ Yes
☒ No
☐ Do not know

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

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?

☒ Yes
☐ No
☐ Do not know

Please explain your response
*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):

The ARO is involved in both the onboarding and offboarding process. During onboarding, the ARO provides records training that includes roles, responsibilities and tasks. A records management policy is also distributed to all staff. During offboarding, the ARO meets with the senior official to walk through and ensure all records are captured before leaving and that the official does not take any records. The ARO also meets regularly with RLOs and senior officials to ensure compliance.

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

☐ Yes
X☐ No
☐ Do not know

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

As noted, the Commission has incorporated electronic recordkeeping into its records management program since the approval of the records schedule. As noted above, the Commission has converted from a traditional, largely paper-based records management system to an electronic system for permanent records that will be sent to NARA. As part of this transition, the Commission undertook an effort to convert all paper-based permanent records to electronic format pursuant to its media-neutral records schedule. This was achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called “Oracle WebCenter Content”; we use an “Oracle WebCenter Content: Records” module specifically for records management. The two components collectively comprise the agency’s user-friendly records management system, known internally as “eCommission.”

As of the filing of this report, the Commission has completed the process of scanning all historical, paper-based permanent records, and is well underway for temporary records.

While not rising to the level of a significant challenge, the Commission continues to look forward to regulations from NARA regarding the disposal of hardcopy versions of permanent records that have been
converted to an electronic format. The Commission maintains detailed inventory of all paper documents, so the absence of regulations adds an additional burden regarding records that have already been converted.

The Commission has processes in place for capturing email records, requiring users to forward any potential records to the Records Officer for review. Email remains challenging at time and therefore the Commission continues to explore other options for greater automation in this process.

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):

The Commission looks forward to receiving regulations regarding the disposal of hardcopy versions of permanent records that have been converted to an electronic format. This guidance from NARA would provide beneficial to the Commission both in terms of its record-keeping workload and physical storage capacity.

The Commission would also further guidance from NARA regarding maintenance of email records, particularly insight regarding existing software to assist with the process of greater automation.

It would be helpful to the extent any such guidance also accounts (if possibly) for the small size and structure of some small agency with a small records management staff.