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.

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 rmselfassessment@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: John L. Hairston
- Position title: Administrator and Chief Executive Officer
                                    DOE – Bonneville Power Administration
- Address: 905 NE 11th Avenue
                                    Portland, OR 97232

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.

   DOE – Bonneville Power Administration

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

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.)

Prior to the pandemic, BPA had already implemented a well-established information governance program (as noted in the 2021 NARA inspection of the Department of Energy) and intellectual control of its information through the policy of mandatory Information Asset Plans (IAPs) for all departments. Throughout the pandemic, BPA's Information Governance & Lifecycle Management (IGLM) program adjusted its practices to provide information management requirements and guidance through web-enabled information sessions and customized information sessions as requested. This practice continues as BPA transitions to a hybrid work environment.

COVID-19 has impacted BPA's continued reliance on analog records and has resulted in a reduction of both creation and receipt of hardcopy records. Departmental units that have traditionally created hardcopy records as part of their business processes were unable to in a telework environment and discovered they had no need for the paper versions. This impact has immensely aided our efforts to move to a fully electronic records environment.

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.

BPA's Information Governance & Lifecycle Management (IGLM) program has developed a project plan to meet the current milestones in OMB/NARA M-19-21 and M-23-07. IGLM tracks metrics of this project plan progress and reports out progress quarterly to its steering committee (Information Governance Oversight Team). Currently BPA has:

- Submitted transfer requests for permanent records identified as being overdue for transfer to NARA and is preparing those records for transfer.
- Created inventories of permanent analog records by surveying managers whose organizations have indicated may have analog records. BPA will use this information to develop more specific plans to either digitize or transfer to a Federal Record Center by June 30, 2024 and identify record series that may warrant an exception to the M-19-21/M-23-07 requirements in accordance with NARA bulletin 2020-01.
- Updated organization Information Asset Plans (IAPs) to verify permanent records, their location, and date ranges for transfers.

4. Has your agency taken action to meet the goal to manage and preserve all <u>temporary</u> 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.

Currently BPA has:
- Created inventories of temporary analog records by surveying managers whose organizations have indicated may have analog records. BPA will use this information to develop more specific plans to either transfer to a Federal Records Center, digitize, or request an exception to the M-19-21/M-23-07 requirements in accordance with NARA bulletin 2020-01.
- Updated organization Information Asset Plans (IAPs).
- Disposed of temporary records within the IGLM records holding area identified as overdue for destruction once COVID restrictions lifted (this started in August 2022).

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.

BPA does not operate an agency storage facility and does not need to change its procedures to meet this requirement.

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.

BPA has used an information governance framework since February 2012 with the publication of its records management policy BPA Policy 236-1 Information Governance and Lifecycle Management. BPA's records management team is called Information Governance and Lifecycle Management (IGLM) and is located within the Information Governance organization, along with the Freedom of Information Act team, and Privacy and Information Collection team. The Information Governance Oversight Team (IGOT) is chaired by the Agency Records Officer (ARO) and is responsible for the oversight of information governance. The IGOT membership includes managers from across the agency including representatives for the CIO, CDO, Office of General Counsel, Cyber Security and Information Security. BPA's ARO is also the Privacy Officer and FOIA Officer.

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.

BPA uses the Capstone approach for managing its email (see GRS 6.1-0305-2021) and this is included in BPA Policy 236-260 Email Management. Information Governance & Lifecycle Management (IGLM) staff work closely with IT staff to manage Capstone retentions in the email system including quarterly audits and participation in upgrades. BPA's instant messages and voice mails are sent to the email system and already receive Capstone retention periods. BPA has reviewed NARA Bulletin 2023-02: Expanding the Use of a Role-Based Approach (Capstone) for Electronic Messages and is in the planning stages to

expand Capstone to other electronic messages not already covered by current policy and procedures.

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.)

BPA's information management tools have artificial intelligence and automation capabilities. Our records management organization (called Information Governance & Lifecycle Management (IGLM)) is currently evaluating these components and their potential use at BPA. A hybrid approach is being explored.

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

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

As SAORM I have empowered the Audit, Compliance, & Governance Committee (ACGC) of the Enterprise Board to oversee compliance and governance programs, including the records management program (Information Governance & Lifecycle Management program (IGLM)). The ACGC includes the Chief Administrative Officer, Chief Operating Officer, Chief Workforce and Strategy Officer, Executive VP of Compliance, Audit, and Risk, Chief Financial Officer, and General Counsel. The ACGC chartered the Information Governance Oversight Team (IGOT), a sub-committee that is chaired by the Agency Records Officer (ARO) and comprised of managers from other organizations, that is responsible for overseeing and evaluating the effectiveness of records management. The IGOT, through the ARO, reports to the ACGC. Additionally, the ARO reports to the Chief Compliance Officer and IGLM is within Agency Compliance & Governance which reports to me through the Executive VP of Compliance, Audit, and Risk.

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.

BPA currently uses guidance and training resources available on NARA's website and records management staff attend Bimonthly Records and Information Discussion Group (BRIDG) meetings hosted by NARA. BPA also receives notices from NARA and the DOE Records Management Program.