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 rmselfassessment@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: Jennifer R. Rodgers
- Position title: Chief Administrative Officer

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.*

   Western Area Power Administration, Department of Energy

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):*
   While WAPA's records management policies have not changed, the COVID-19 pandemic caused many organizations to quickly reevaluate and update business processes to support digital work. The pandemic created a fundamental shift in the way we work. These changes only highlight the importance of transitioning to full electronic records management.

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.*

WAPA has an established team of program managers from records management, IT, strategy, risk management, asset management, and budget to coordinate and collaborate across functional areas. This team helps WAPA make decisions not only about specific tools and systems we will use, but also how to strategically leverage information to support workload management, asset management, project management, and more.

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):*
    Yes. WAPA's RIM program has developed an office-by-office approach to establishing formal electronic records management processes based off their file plan. This approach relies on standardized metadata association to allow for the capture of records. To date, WAPA has received draft submissions or requests for assistance from 100% of our offices.

5. **Will your agency meet the goal to manage and preserve all <u>temporary</u> 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):*
    As noted in the response to question 4, WAPA is implementing an office-by-office approach to electronic records management. WAPA is committed to managing WAPA's records in electronic format to the fullest extent possible by December 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.*
    WAPA is considering submitting an exception for the following types of records:
    - Permanent records:
        - Legacy records created when WAPA was part of the Bureau of Reclamation. While WAPA has made significant strides in identifying, inventorying, and reviewing these records, Bureau of Reclamation era records are still occasionally found in WAPA offices. Reviewing these legacy records for transfer to NARA requires coordination with both the National Archives at Denver and the Bureau of Reclamation to determine if these are original records or duplicates of other holdings. If these are unique records, WAPA would offer to the National Archives at Denver as a direct offer.
    - Temporary records:
        - Lands Case Files. WAPA must continue to create paper records of certain records created and managed by our Natural Resources Office. These often include certified mail, land deeds, and other records used by multiple parties that must be retained in hard copy in addition to any electronic use version.
        - Certain financial information for loan financing. WAPA's Transmission Infrastructure Program manages the loan application process. WAPA often receives financial

documentation from external entities in hard copy format only.

- o Certain records maintained at remote locations. WAPA maintains many facilities in remote locations where records covering site specific information are maintained in hard copy format only and there are not means to manage these local records electronically.
- o Temporary records stored in Government Owned buildings. WAPA maintains temporary records several WAPA-owned buildings. Many of these buildings are in more rural locations where local commercial options that comply with NARA requirements are not available. These facilities each hold between 150 and 1,000 feet of records. The records are described in our records management application and records are reviewed by business owners when eligible for disposition.

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.*

WAPA began our Records Modernization Initiative in 2017 before GSA's SIN for ERM was established. We entered into a 5 year period of performance contract for our ERM services. WAPA primarily utilizes NASA SEWP for procuring IT 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.*

WAPA's primary focus is to ensure all paper permanent records are sent to a NARA Federal Records Center by December 31, 2022. WAPA does not have any facilities that meet the regulatory definition of an "agency-operated records center." WAPA does plan on applying for an exemption to temporary records stored in WAPA-owned buildings as noted in question 6. However, WAPA is planning on moving all records out of the leased Headquarters building. There are approximately 5,000 feet of records at WAPA's Headquarters and the lease on our building ends in 2027, with 2 additional option years. WAPA is evaluating three options:

- Move all temporary paper records to the Federal Records Center by December 31, 2022.
- Move all temporary paper records to commercial storage by December 31, 2022.
- Keep temporary paper records on-site past 2022 to digitize specific records and move records

to commercial storage by 2029 when our current lease expires. This allows us to send the minimal amount of records to commercial storage maximizing cost savings.

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

   ☐ **<u>Yes</u>**
   ☐ No
   ☐ Do not know

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

The biggest challenge WAPA sees to fully implementing electronic records management is reliance on the records creators to declare a record. Due to WAPA's size, fully automated records management is not a feasible option. The goal is to automate as much as possible, but many situations still require human interaction. Fortunately, as a public utility, WAPA is used to keeping evidence for external regulators and there is a strong recognition of the importance of records management.

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
   ☐ **<u>No</u>**
   ☐ Do not know

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