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):

- **Peter Bergstrom**
- **CFO/Associate Director for Management**
- **Financial Crimes Enforcement Network**
- **Office of Terrorism and Financial Intelligence**
- **U.S. Department of the 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 changed any policies or practices related to records management at your agency?**

   x Yes
   ☐ No

   Most employees are teleworking due to COVID-19, which has delayed our paper records inventory, disposition and shipment of records to NARA.

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)**

   x Yes
   ☐ No
   ☐ Do not know

   Please provide details on what support is needed:

   The Records Office has a solid working relationship with the staff members of the CIO and SAORM. The Records Office is in the process of developing an Office 365 Records Management Share Point site and needs the technical knowledge and support of the IT Project Manager to develop and deploy the site.

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 Records Office has identified and appointed Records Liaisons in each office and trained them on metadata and the Electronic Records lifecycle. 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 of records to NARA.

We are currently preparing to have all permanent paper records sent to the Federal Records Center or National Archives before Dec 31. 2022.

5. **Has your agency made progress towards managing all <u>temporary</u> 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 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.

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

x 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.

FinCEN has invested in Office 365 to support records management, manage general email and capstone email. FinCEN also invested in the security and compliance module extension which gives us expanded capability in the area of records management. Also, the Records Management SharePoint site will provide an automated platform to manage FinCEN's electronic records.

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
   x No
   ☐ Do not know

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

   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.

8. **Does your agency have policies and procedures that include documentation to ensure records of <u>newly appointed and outgoing senior officials</u>* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?**

   *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):

   FinCEN has a New Employee Orientation for all employees and senior officials. Records Management is a part of the New Employee Orientation, and the Records Management Officer ensures that all employees and senior officials are briefed on the laws and policies of Records Management and the importance of protecting and preserving records through the Records Lifecycle. Senior officials must complete additional records management training within the first thirty days of employment. Senior officials must also complete Records Management training annually.

   The Records Management Officer contacts all departing senior officials and briefs them on their responsibilities to preserve records. Before departing FinCEN, all senior officials must complete and sign a departure removal of information form to certify they are not destroying or removing records.

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

x Yes
☐ No
☐ Do not know

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

While some of our employees have been reluctant to stop using the legacy records keeping system, we are gaining their support through education and training. Most employees are teleworking due to COVID-19, which has delayed our paper records inventory, disposition and shipment of records to NARA. However, FinCEN has the staff and resources necessary to meet the electronic recordkeeping goals.

10. **Do you have suggestions for NARA to improve its engagement with you as the SAORM?**

☐ Yes
x No
☐ Do not know

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