



## *Senior Agency Official for Records Management 2020 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. 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 [rmsselfassessment@nara.gov](mailto:rmsselfassessment@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: Kate Higginbothom
- Position title: Deputy Staff Director for Management & Administration
- Address: 1050 First Street, NE, Washington, DC 20463

**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.*

Federal Election Commission

**2. Has the COVID-19 pandemic changed any 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):*

In response to the COVID-19 pandemic, the FEC transitioned to a mandatory telework status in mid-March of 2020, with only a limited number of staff reporting to the agency's offices on an intermittent basis to perform essential onsite services. As a result of the FEC being in a near 100 percent telework status, agency personnel have been creating and maintaining virtually all new agency records in an electronic format over the past year. With this change in the FEC's telework posture, certain agency policies and practices have been modified during this period. For example, existing agency policy provided that certifications of official Commission votes, which are permanent records, would be created in hardcopy and embossed with a physical seal. The Commission approved a temporary change to this policy, which allows the agency's Office of the Commission Secretary to create vote certifications in pdf format and to affix the documents with an electronic seal. Overall, the shift to creating and maintaining these documents solely in an electronic format has gone very smoothly and has helped to lay a foundation for moving the agency toward maintaining these documents and all other permanent records in electronic format.

**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

*Please provide details on what support is needed:*

The FEC's SAORM and Acting ARO work closely with the CIO and other personnel in the agency's OCIO, as well as the agency's Chief FOIA Officer. However, the agency does not have an established governance framework connecting records management, data management, and other agency information lines of business. The FEC could use further guidance from NARA on best practices for establishing this type of governance framework, particularly in the context of a small agency environment in which dedicated staff and budgetary resources for records management can be rather limited.

**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)**

- Yes  
 No  
 Do not know

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

In 2020, the FEC continued to make progress toward the goal managing permanent records in an electronic format with appropriate metadata by the end of 2022. With contractor assistance, the agency completed a project for developing the email system workflows necessary to implement our Capstone Email Records Management Schedule, so that permanent email records may be managed in electronic format throughout their lifecycle for eventual transfer and accessing by NARA in electronic format. However, we experienced some unanticipated challenges in 2020, which delayed our progress somewhat. The agency had planned to hire for a Records Management Analyst position in late-2020, but had to delay this hiring due to budgetary constraints. This position would have been the agency's first hire dedicated full-time to working on our records management program, and was to be tasked with developing and implementing agency-wide records management training, updating agency records schedules in accordance with the requirements of OMB M-19-21, and revising agency records' policies and procedures. We are hopeful that more resources will become available in FY 2022, so that this position can be filled in early 2022. In the interim, we will try to leverage other staff resources, on an as-available basis, to address our most immediate needs in these areas. In 2020, the COVID-19 pandemic also created competing priorities for myself and the Acting ARO, as we worked to transition our offices to a 100 percent telework environment, which took time away from records management projects. Nevertheless, we remain optimistic that we will be able to achieve the goal set forth in OMB M-19-21.

**5. Has your agency made progress towards managing 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 and example metrics):*

The FEC has not yet made progress toward managing all temporary records in electronic format, as the agency is currently focused on working toward managing all permanent records in electronic format. We intend to start working toward managing temporary records in electronic format in 2021.

**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.*

In FY 2020, the agency funded a contract for records management consulting services to assist the agency with the configuration of email system workflows to facilitate implementation of the FEC's NARA-approved Capstone Email Records Management Schedule and ensure that permanent email records can be electronically managed to the fullest extent possible for eventual transfer and accessing by NARA in electronic format. This year the agency is also devoting resources to upgrading our Enterprise Content Management (ECM) system, in which many agency records are electronically created and maintained. However, the agency will need to invest additional resources to ensure that all non-email records can be managed in electronic format throughout their lifecycle, which is contingent on the availability of funds in future fiscal years.

**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):*

Not applicable. The FEC does not maintain any agency-operated records centers.

**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?**

\*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.

- Yes  
 No  
 Do not know

*Please explain your response (include specific details of policies and procedures):*

The FEC's Email Management Policy prohibits senior officials (all of whose email accounts have designated as Capstone accounts) from deleting or culling any email messages that constitute federal records. The policy advises employees that "the willful culling of any email in violation of 18 U.S.C. 2071, and may subject the user to criminal and/or administrative penalties." Email records of senior officials are automatically maintained electronically in accordance with the agency's NARA-approved Capstone Email Records Management Schedule.

The FEC does not have in place specific policies or procedures to ensure that all non-email records of newly appointed and outgoing senior officials are properly captured and/or processed and maintained. The agency had hoped to launch role-based records management training for all agency employees, including senior officials, during 2020. However, due to competing priorities associated with moving the agency's operations to a 100 percent telework environment and budget constraints that required a delay in hiring for the agency's new Records Management Analyst position, we were unable to achieve this goal. We hope to implement the training by early FY 2022. In addition, we will be working to develop a more comprehensive records management program policy and corresponding procedures to address records of senior officials.

**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 a small agency, the FEC has limited staff and budgetary resources to devote to its records management program, which will make meeting the goal fully-electronic recordkeeping by December 31, 2022 rather challenging. At present, the FEC has no employees who are dedicated full-time to records management. In 2020, we intended to hire for a Records Management Analyst position, which would be devoted to working full-time on further developing and implementing the agency's records management program, but budget constraints in FY 2021 have required hiring for this position to be placed on hold. We hope to be able to fill this position in early FY 2022, but in the meantime the agency's records management functions will continue to be performed by staff for whom records management is one of many duties.

**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):*