



## *Senior Agency Official for Records Management 2023 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 (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 8, 2024, and reports are due back to NARA no later than March 8, 2024.**

NARA plans to post your 2023 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.

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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 [rmsselfassessment@nara.gov](mailto:rmsselfassessment@nara.gov). Include the words “SAORM 2023 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: Dayna C. Brown
- Position title: Deputy Staff Director – Management and Administration

**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.*

Federal Election Commission

**2. Will your agency 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  
 Not applicable, all records are in electronic format

*If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)*

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The FEC has continued to make progress toward the goal of managing, preserving and transferring all permanent records in an electronic format with appropriate metadata by June 30, 2024. With contractor assistance, the Agency completed a project for developing the email system workflows necessary to implement our Capstone Email Records Management Schedule, such that permanent email records can be managed in electronic format throughout their lifecycle for eventual transfer and accessing by NARA in electronic format. However, we experienced some unanticipated challenges that delayed our progress. Specifically, the Agency had to delay hiring for a Records Manager due to budgetary constraints and a shortage of qualified candidates who were interested in the position. The position, which is the FEC's first hire dedicated full-time to records management, was ultimately filled in May 2023 and the Records Manager is now focused exclusively on bringing the Agency into compliance with the requirements of M-19-21 and M-23-07. Additionally, the Agency received a new SAORM in September 2023. With the onboarding of new records management personnel in 2023, we focused specifically on the Agency's paper records and will meet the goal of transferring all paper/analog records by the June 30, 2024 deadline. All electronic records will be transferred with appropriate metadata at the time of transfer.

**3. Will your agency meet the goal to manage and preserve all temporary records in an electronic format by June 30, 2024? (M-19-21, 1.3 and M-23-07, 1.3)**

- Yes  
 No  
 Not applicable, all records are in electronic format

*If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)*

**4. 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 by June 30, 2024? (Choose all that apply)**

- Yes  
 No  
 Not applicable, my agency does not have agency-operated records storage facilities  
 Not applicable, all records are in electronic format

*If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)*

**5. Will your agency meet the requirements of M-19-21, 1.3 and M-23-07, 1.3 and transfer inactive records to a NARA Federal Records Center (FRC) or commercial storage facilities by June 30, 2024? (Choose all that apply)**

- Yes, we will transfer to the FRC  
 Yes, we will transfer to commercial storage facilities

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- No
  - Not applicable, all records are in electronic format

*If 'No,' why not? (Please include if you will be submitting an exception request and/or details of specific challenges in meeting the goal.)*

Agency note: NARA advised agencies in its February 16, 2024 Agency Communication (AC 17.2024) that all transfer requests and direct officers must be *entered* by the June 30, 2024. The email specifically stated, “The physical transfer of permanent records is an activity that takes a great deal of coordination and logistical effort. As long as the proposed transfer request has been made before the deadline, the length of time it takes to approve and complete the transfer will not impact what format the records will eventually be transferred to NARA.”

**6. Does your agency have a Data Management Strategy that includes records management principles? (<https://www.archives.gov/files/records-mgmt/resources/cdo-rm-assessment-report.pdf>)**

- Yes
- No

*Please explain your response.*

As we understand it, the FEC is exempt from the *Evidence Act* as a non-CFO Act agency. Nevertheless, the agency does apply records management principles to its data. Specifically, data is maintained such that it is usable, authentic, reliable, and secure. The Office of the Chief Information Officer ensures this by upholding industry leading standards for data security with its use of encryption, access, controls, backup and recovery, and patching. Additionally, the FEC’s SAORM and Agency Records Officer work with the agency’s Chief Information Officer and Chief Information Security Officer, as well as the agency’s Chief Freedom of Information Act Officer on issues related to the records management program. The Agency’s Information System Security Program policies incorporate records management principles by addressing the requirement for employees “to protect information throughout its life cycle, from creation or collection through disposition.” With the agency’s first-ever, full-time records management employee onboarded in May 2023, as these policies are updated, and new records management policies are developed at the FEC, we will work to create more direct linkages between the policies supporting the agency’s data management and our records management program.

**7. In your role as SAORM, do you meet with your Agency Records Officer(s) to discuss the agency records management program’s goals?**

- Yes
- No

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- Not applicable, my agency does not currently have a designated Agency Records Officer

*Please explain your response. (If 'Yes,' please include how often, a description of topics, and outcomes of these meetings. If 'No,' please explain why not.)*

Since assuming the role of SAORM in September 2023, the ARO and I established regular, biweekly meetings for the final quarter of calendar year 2023. The meetings assisted me in assessing the effectiveness of the Agency's records management program and its compliance with applicable statutes, regulations, and NARA procedures and requirements. Additionally, these meetings were used to ensure preparation and progress toward meeting the M-19-21 and M-23-07 June 30, 2024 deadline to ensure that FEC records are created, retained, and managed in electronic formats.

**8. Has your agency incorporated NARA's digitization standards into your Information Resource Management (IRM) Strategic Plan? (44 U.S.C. 3506(b)(2) and OMB Circular A-130)**

- Yes  
 No  
 Not applicable, my agency is not currently digitizing records

*Please explain your response. (If 'Yes,' what steps have been taken? If 'No,' why not?)*

NARA's digitization standards were published in May 2023 and took effect in June 2023. Given that the Agency's current Information Technology Strategic Plan covers the five-year period ending September 30, 2024, the agency Senior Agency Official for Records Management, Agency Records Officer, and Records Manager will work with the Office of the Chief Information Officer to incorporate the new standards into its next five-year strategic plan and/or agency policy or procedure, as appropriate.

**9. Does your agency have a social media strategy that includes capturing and maintaining records in accordance with records management statutes and regulations?**

- Yes  
 No

*Please explain your response.*

Following a series of delays, including budgetary constraints and a shortage of qualified candidates, in May 2023, the Agency filled its first position dedicated solely to records management when onboarding a Records Manager. Since that time, the new Records Manager has focused on ensuring the Agency is prepared to meet the M-19-21 and M-23-07 June 30, 2024 deadline. Once the requirements outlined in these directives are met, the Agency Records Officer and Records Manager will focus on other aspects of the

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Agency's records management program including records related to social media. The Agency has a minimal social media presence. Of note, the Agency has a minimal social media presence.

**Is there specific policy or guidance you need from NARA to support the strategic direction of your records management program?**

- Yes
- No

*Please explain your response and include any comments on existing, pending, and future topics.*