



## *Senior Agency Official for Records Management 2019 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 13, 2020, with reports due back to NARA no later than March 13, 2020.

NARA plans to post your 2019 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, 2019.
- 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 2019 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: [Valerie Green](#)
- Position title: [Chief Administrative Services Officer](#)
- Address: [600 Pennsylvania Ave., NW, Washington, D.C., 20580](#)

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.**

*Please provide list:*

[The Federal Trade Commission \(FTC\)](#)

2. **Is your agency managing all permanent electronic records in electronic format as of December 31, 2019? (M-19-21, 1.1)**

Yes

No

*Please explain your response:*

As of December 31, 2019, the [FTC](#) continued to manage permanent electronic records in electronic format to the fullest extent possible. The [FTC](#) manages permanent electronic matter records in electronic format in the agency's matter management system, [DocSmart](#), and the related indexing system, [Matter Management System \(MMS2\)](#). The [FTC](#) continues to assess its management of email and its processes and resources needed to address [NARA's findings in its "Email Management at Independent Agencies" Assessment Report](#) issued in September 2019.

3. **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

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

As specified in the agency's Strategic Plan 2018-2022, [Strategic Plan: Fiscal Year 2018 Through Fiscal Year 2022](#) and the corresponding performance goals, [Federal Trade](#)

Commission FY 2019 Strategic Plan Addendum, the agency continued to make progress in FY2019 towards managing permanent records in an electronic format with appropriate metadata as prescribed in M-19-21.

The agency manages its permanent matter/case management records in electronic format. FTC performance goal 3.3.5 requires the agency to transfer permanent electronic records dated between 2004 and 2016 to NARA by FY2022. In FY2019, the FTC submitted three data sets from the years 2004 through 2007, consisting of permanent matter/case files and the corresponding indices/metadata (e.g., matter name, matter number, etc.).

**4. Has your agency made progress towards managing all temporary records in electronic format? (M-19-21, 1.3)**

- Yes  
 No

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

The FTC manages its temporary administrative/housekeeping records, e.g., payroll, in electronic format. The agency is making progress towards the management of its mission-related temporary electronic records through implementation by the agency's regional offices of a standardized file structure in shared drives.

In FY2019, the FTC implemented its Records and Information Liaison (RIL) program to support the management and disposition of temporary electronic mission-related records and non-records in the agency's headquarters and regional offices.

The FTC Senior Agency Official for Records Management (SAORM) and Chief Information Officer (CIO) are evaluating next steps to incorporate management of temporary records into an electronic recordkeeping system that would meet all applicable NARA requirements. The FTC also continues to assess its management of email and its processes and resources needed to address NARA's findings in its "Email Management at Independent Agencies" Assessment Report issued in September 2019.

**5. Have you, as the SAORM, taken steps to ensure that your records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures? (M-19-21, 1.4)**

- Yes  
 No

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

Yes, as the SAORM, I have taken steps to ensure compliance by developing and implementing performance goals, objectives, and measures in the agency's Strategic Plan.

The public performance goals include the disposal of temporary and permanent textual records in off-site storage and the transfer of permanent electronic records to the National Archives. See [Federal Trade Commission 2018-2022 Strategic Plan](#) and [Federal Trade Commission FY 2018-2022 Strategic Plan Addendum for Fiscal Years 2019–2022](#).

As the SAORM, I updated the FTC’s Records and Information Management Policy in the agency’s administrative manual in FY2019. The updated policy clarified key authorities, definitions, and roles and responsibilities, and included a more robust description of agency-wide Records Information Liaisons. Further, I supported the identification of new agency records disposition schedules and the FTC resources associated with the development of the schedules.

**6. If applicable, have you identified all agency-operated records centers and made plans to either close them before 2022, or have you submitted a request to NARA for an exception? (M-19-21, 1.3)**

- Yes
- No

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

N/A - The FTC does not have an agency-operated records center.

**7. Does your agency have procedures that include documentation to ensure records of 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

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

The FTC Records and Information Management group, the Office of the CIO, and the Office of General Counsel consult with departing Commissioners and their staff on the proper management of FTC records, ensuring to the greatest extent possible that records, including electronic records and email, are properly captured and/or processed and not improperly removed, altered, or deleted. Additional consultations for other officials and staff are conducted on an ad-hoc basis.

The agency provides guidance on what constitutes a record that must be preserved by departing employees on its intranet website and administrative manual. The FTC will develop documented procedures for ensuring the transfer of senior officials' records into the agency's electronic records system for preservation. The FTC will expand its consultative process to include additional staff in accordance with NARA's definition of senior officials.

Going forward, the SAORM and Agency Records Officer will collaborate with the FTC Human Capital Management Office on a planned, new electronic system and workflow for the onboarding and offboarding of FTC employees. The SAORM and Agency Records Officer will ensure that records management requirements are incorporated in the new system and process.

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

Yes

No

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

Like other small agencies, the FTC is working to determine how to incorporate records management controls in the full lifecycle of electronic information systems. The FTC is taking steps to incorporate records management requirements into system planning, procurement, data migration, and life cycle processes, but efforts are complex, multi-year, and resource-dependent.

The FTC manually manages most of its electronic records management processes, such as declaration, capture, organization, security, access and retrieval, monitoring, preservation, execution of disposition per the agency's NARA approved records disposition schedule, and the management of backups of systems and files for permanent and temporary records.

NARA's FY2019 "Assessment on Email Management in Independent Agencies" resulted in several findings for the FTC to address, including the association of email with project or case files, saving email with metadata, and the inclusion of email management in records management training. The FTC is evaluating these findings and evaluating its email management policies, generally.

**9. Do you need support from NARA to ensure a successful transition to fully-electronic recordkeeping?**

Yes

No *Please provide details on what support is needed:*

The FTC greatly appreciates NARA's ongoing support. NARA's appraisal archivist assigned to the FTC, NARA archival records staff, and NARA FRC staff provided extensive support and guidance in FY2019 during the FTC's efforts to implement a modern records management program.