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: Alisa Cottone
Position title: Director, Workplace Solutions Department
Address: PBGC, 1200 K Street N.W., Washington DC, 20005

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.

   PBGC (Pension Benefit Guaranty Corporation) entirely.

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):
   PBGC has continued to emphasize electronic records management during our extended telework arrangement. All PBGC work must be performed on PBGC equipment, within our network, and saved to appropriate SharePoint team sites and other IT systems. Delays from FRC picking up records has created an impact on our Records Management practice (i.e. PBGC is preparing for an agency relocation, planned for May 2022. As of February 2022, we have yet to confirm a date with the FRC to pickup and store temporary records.)

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.
   The PBGC Records Officer is a member of the SharePoint Technology Council and the CIO/ CMO Quarterly meetings are held to discussed information technology implementation including records management. RMSA is reviewed by the CIO and the Privacy Officer before

submission. However, we do not have an established data governance framework.

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
    ☒ <u>No</u>
    ☐ Do not know

    Please explain your response (include specific goals, example metrics, and/or challenges):
    PBGC planned to implement SharePoint Records Center solution using workflows to identify permanent records and tag them with the appropriate metadata and retention schedule to manage their lifecycle. However, this solution has run into technical difficulties and a new solution will be required. The agency is undergoing a move and will look for an alternative solution beginning in October 2022.

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)**

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

    Please explain your response (include specific goals, example metrics, and/or challenges):
    Though we do not have the Records Center, we are still managing our temporary records electronically based on Requirements 1.3 of M-19-21. We do plan to abide by the rules of transferring as well (Requirement 2.4 of
    M-19-21 for temporary records).

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?**

    ☒ <u>Yes</u>
    ☐ 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.
    As mentioned in question #4, the agency is in the process of determining an alternative solution to the Records Center. Therefore, we plan to submit our exception by December 31, 2022 due to a number of solutions being considered and our physical office move.

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
    ☒ <u>No</u>
    ☐ 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.
    PBGC planned to develop a SharePoint workflow process to manage all records

electronically with appropriate metadata. PBGC will consider utilizing General Services Administration's Special Item Number for Electronic Records Management (518210 ERM) 6 if a solution is procured.

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?***

☒ <u>Yes</u>
☐ 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.
PBGC does not use any agency-operated storage center and does not plan to transfer any paper records after December 31, 2022. PBGC already has a contract with a commercial storage facility (Iron Mountain) that meets NARA's requirements.

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):
Our records management solution has run into technical difficulties and a new solution will be required. The agency is undergoing a move which requires significant resources. Our Records Officer retired and a replacement has not on-boarded. With the COVID-19, agency staff mostly telework and do not plan to return to office until September 2022. While we are able to complete all of our work, some items are taking longer in a remote setting.

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?**

☒ <u>Yes</u>
☐ No
☐ Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):
NARA to continue providing current and updated resources on the NARA Records Management Website. The PBGC has found NARA Bulletins, RM Guidance, and training useful.