



## *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: Olivier Girod
- Position title: Director, Office of Support Operations

**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.*

The U.S. Securities and Exchange Commission (SEC)

**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

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

**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
- 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.)*

**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

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*Please explain your response.*

The SEC's Office of Records Management Service (ORMS) plays a key role ensuring that records management principles are implemented within the SEC's data management strategy. Among other activities, ORMS coordinates records management with information technology, information access, acquisitions, and the SEC's Office of the General Counsel (OGC). Examples of this coordination include ORMS participating in the Office of the Chief Data Officer's Data Management Board to provide strategic direction in the creation and implementation of the SEC's Data Strategy; working in close consultation with the SEC's Office of Information Technology (OIT) to ensure that records management requirements are embedded throughout the entire system's lifecycle; coordinating with the SEC's Office of Acquisitions (OA) to modify contract language to include recordkeeping requirements in the procurement of electronic information systems (EIS) and the procurement of digitization services; and working to ensure SEC records schedules and file plans remain current with assistance from an established network of Division and Office record liaisons.

**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

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.)*

As the SAORM, I regularly meet with the director of ORMS, the SEC Archivist, to discuss the SEC's records management program's goals.

**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?)*

The National Archives and Records Administration's (NARA's) digitization standards went into effect in June of 2023 and the SEC's Information Resource Management (IRM) Strategic Plan has not been updated since that time.

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**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.*

The SEC has a social media strategy that includes records management guidance in compliance with records management statutes and regulations. ORMS maintains the *Records Management Guidance for Social Media Records* which identifies requirements and steps for SEC staff to follow to ensure that social media records are retained in accordance with the appropriate GRS or SEC-specific records schedule.

**10. 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.*

At this time, the SEC has not identified any specific need which will require strategic support from NARA.