



Senior Agency Official for Records Management 2021 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. 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 rmsselfassessment@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:
- Position title:
- Address:

David B. Fountain
Executive Vice President and General Counsel
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37890

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.

This report will be all inclusive for the Tennessee Valley Authority (TVA).

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):

The pandemic highlighted the importance of transitioning from paper to electronic records management and helped move initiatives forward toward the December 2022 deadline. TVA is focused on a campaign to “reimagine the workplace” which includes a collaboration between Enterprise Records, Facilities Management, and Technology & Innovation to specifically target records management practices as employees have the opportunity to return to the workplace for a period of hybrid exploration.

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.

Enterprise Records is integrated into many programs at TVA including collaborative partnerships to promote federal records management.

- Partners with Data Governance to achieve common goals to ensure that agency records are appropriately managed throughout the records lifecycle and that data policies exist to manage non-record material.
- Partners with Technology & Innovation to review new systems and approve enhancements to integrate systems with the official electronic recordkeeping system.
- Partners with Cybersecurity and Privacy to ensure the sustainability of records and implementation of CUI classifications.
- Partners with Emergency Management and Technology & Innovation to establish essential records and business continuity plans.
- Partners with FOIA and Legal Counsel to respond to information requests and subpoenas.
- Partners with the SAORM to provide strategy direction to federal records management program and ensure adequate resources for execution of governance role.

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
 No
 Do not know

Please explain your response (include specific goals, example metrics, and/or challenges):

TVA has been managing all current permanent records electronically for some time. Much work has been done to transfer closed permanent paper records to NARA and work continues on identifying and digitizing active paper holdings.

5. Will your agency meet the goal to manage and preserve 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, example metrics, and/or challenges):

Specific efforts have been underway at TVA to meet with business units to identify any holdings outside OpenText ECM and other integrated data-specific platforms driven by business requirements.

There has been a limited number of areas where paper records were still being created and stored in physical form, particularly in the plant and field work areas. Business solutions have been created to allow records to be created electronically using dynamic forms and approval stamps to transition this process.

Additional work is needed to effectively manage electronic records through the final stage of the lifecycle – disposition. For temporary records, this includes an improved process to connect trigger dates of closure with disposition rules for subsequent destruction after retention is met.

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?

- Yes
 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.

While TVA does not have specific plans to request an exception, there is some work that could be delayed due to pandemic conditions, including review and reconciliation of holdings in federal record centers and commercial records facilities.

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
 No
 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.

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?*

- Yes
 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.

TVA closed its agency-operated records center in 2019. Eligible records are held at the Federal Records Center in Ellenwood, GA and the Iron Mountain commercial storage facility in Boyers, PA.

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):

TVA is on track to meet all requirements; however, the pandemic has certainly hindered the work of the Enterprise Records team in auditing business units across TVA, resulting in an aggressive schedule planned for the rest of 2022.

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?

- Yes
 No
 Do not know

Please explain your response (include any comments on previous NARA SAORM engagements, topics for future engagements, or other suggestions):

TENNESSEE VALLEY AUTHORITY

A handwritten signature in black ink, appearing to read "David B. Fountain", written in a cursive style.

David B. Fountain
Executive Vice President and General Counsel
Senior Agency Official for Records Management