



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: James Strawley
- Position title: Deputy Staff Director
- Address: One Columbus Circle, Suite 2-500
Washington, DC 20002

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.

United States Sentencing Commission

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):

Like most agencies, the COVID-19 pandemic impacted Commission record operations. The pandemic slowed the Commission's efforts to digitize records and caused a delay in the transfer of records to NARA. The Commission has now completed backlogged transfers, as well as its most recent transfer. Even with these impacts, the Commission retained access to essential records through its internal electronic management system.

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 Agency Record Office is in contact with all parts of the agency regarding records management issues and is an involved stakeholder in all projects that affect records management or agency digital records. The Agency Records Officer is in regular contact with the Senior Agency Officer for Records Management, who is in turn, a part of most major Commission business processes and has direct contact with the agency head.

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):

The United States Sentencing Commission ("Commission") has converted from a traditional, largely paper-based records management system to maintaining an electronic system for permanent records and temporary records. As part of this transition, although the Commission has retained its permanent paper records pursuant to applicable regulations (and while awaiting updated guidance from NARA), the Commission undertook an effort to scan all paper-based permanent records to an electronic format pursuant to its media-neutral records schedule. This was achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called "Oracle WebCenter Content"; we use an "Oracle WebCenter Content: Records" module specifically for records management. The two components collectively comprise the agency's user-friendly records management system, known internally as "eCommission." As of the filing of this report, the Commission has completed the process of scanning all historical, paper based permanent records. In more recent years, the Commission is also transferring its previously-created electronic files (e.g., pdf, Word, Word Perfect, Excel, and Power Point files) into the eCommission system –including all files that qualify as permanent records. Lastly, the Commission has instituted a process by which all contemporaneous permanent records are maintained and uploaded into eCommission in electronic format. The metadata and filetype are maintained and each record also creates a PDF-A version of itself. A similar process is also underway to achieve full digitalization of the Commission's temporary records. Once gathered and uploaded to eCommission, all records undergo a process to ensure proper disposition under the Commission's records schedule. Our records specialist, Brittany Davis, is responsible for moving the documents uploaded into the eCommission from the "documents" side to the "records" side of the eCommission (if the documents qualify as "permanent" records), pursuant to our CRDS. Once a file is moved to the "records" side, it is set for disposition in accordance with the CRDS (i.e., depending on the document's creation date, it will be sent to NARA in

electronic form). An electronic copy of all records remains in the eCommission after they are sent to NARA for ongoing Commission business use.

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):

As noted, the Commission is undertaking the same digitization process discussed in the previous answer for the digitization of all temporary records. The Commission has converted from a traditional, largely paper-based records management system to an electronic system for records that will be sent to NARA. As part of this transition, the Commission undertook an effort to scan all paper-based temporary records to electronic format. This is achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records are uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called "Oracle WebCenter Content"; we use an "Oracle WebCenter Content: Records" module specifically for records management. The two components collectively comprise the agency's user-friendly records management system, known internally as "eCommission."

Pre-pandemic, the ARO engaging in scanning of temporary records, averaging 4-5 boxes of digitized records a week. Once scanned, the scanned temporary records are saved into a shared drive which then uploads to the ERMS or uploaded into the ERMS directly. While the Commission continues toward its goal of having all paper temporary records scanned before the end of the year, record operations were impacted by the pandemic. In an effort to speed the scanning process, the Commission has begun training and incorporating an administrative staff member into the scanning process. Nevertheless, before ultimate inclusion in the ERMS, all scanned documents will still be reviewed by the ARO for accuracy, completeness and records scheduling.

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.

As noted in the previous response, pre-pandemic, the ARO engaging in scanning of temporary records, averaging 4-5 boxes of digitized records a week. Once scanned, the scanned temporary records are saved into a shared drive which then uploads to the ERMS or uploaded into the ERMS directly. While the Commission continues toward its goal of having all paper temporary records scanned before the end of the year, record operations were impacted by the pandemic. In an effort to speed the scanning process, the Commission has begun training and incorporating an administrative staff member into the scanning process. Nevertheless, before ultimate inclusion in the ERMS, all scanned documents will still be reviewed by the ARO for accuracy, completeness and records scheduling.

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.

As noted, the Commission has previously invested in OCR-enabled scanners and scanning software. The Commission has also invested in a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called “Oracle WebCenter Content”; we use an “Oracle WebCenter Content: Records” module specifically for records management. The two components collectively comprise the agency’s user-friendly records management system, known internally as “eCommission.” The Commission does constantly update and improve both the backend for security and the front facing portion for usability as part of its other Oracle system maintenance projects.

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.

The Commission does not make use of agency-operated storage facilities or commercial storage facilities. Additionally, the Commission does not anticipate new transfers to the Federal Records Center. In fact, the Commission took significant steps during the pandemic to reduce its current inventory at the FRC. As noted above, the Commission has converted from a traditional, largely paper-based records management system to maintaining an electronic system for permanent records and temporary records. As part of this transition, although the Commission has retained its permanent paper records pursuant to applicable regulations (and while awaiting updated guidance from NARA), the Commission undertook an effort to scan all paper-based permanent and temporary records to an electronic format. This was achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called "Oracle WebCenter Content"; we use an "Oracle WebCenter Content: Records" module specifically for records management. The two components collectively comprise the agency's user-friendly records management system, known internally as "eCommission." As of the filing of this report, the Commission has made significant progress on scanning its temporary records and have disposed of paper records according to NARA guidance. Remaining paper temporary records are kept onsite for scanning and business use.

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):

As noted, the Commission has incorporated electronic recordkeeping into its records management program since the approval of the records schedule. As noted above, the Commission has converted from a traditional, largely paper-based records management system to an electronic system for scanned permanent and temporary records. As part of this transition, the Commission undertook an effort to scan all paper-based permanent and temporary records to electronic format. This was achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called "Oracle WebCenter Content"; we use an "Oracle WebCenter Content: Records" module specifically for records management. The two components collectively comprise the agency's user-friendly records management system, known internally as "eCommission." As of the filing of this report, the Commission has completed the process of scanning all historical, paper based permanent records, and is well underway for temporary records. While not rising to the level of a significant challenge, the Commission continues to look forward to regulations from NARA regarding the disposal of hardcopy versions of permanent records that have been converted to an electronic format. The Commission maintains detailed inventory of all paper documents, so the absence of regulations adds an additional burden regarding records storage and maintaining

hardcopies as the record copy for permanent records. The Commission has processes in place for capturing email records, requiring users to forward any potential records to the Records Officer for review. Email remains challenging at time and therefore the Commission continues to explore other options for greater automation in this process.

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):

The Commission looks forward to receiving regulations regarding the disposal of hardcopy versions of permanent records that have been scanned to an electronic format. This guidance from NARA would prove beneficial to the Commission both in terms of its record-keeping workload and physical storage capacity.

The Commission would also further guidance from NARA regarding maintenance of email records, particularly insight regarding existing software to assist with the process of greater automation.

It would be helpful to the extent that new NARA guidance accounts (if possible) for the small size and structure of some small agency with a small records management staff.