The OMB/NARA *Managing Government Records Directive* (M-12-18) requires Senior Agency Officials for Records Management (SAORM) to provide an annual report to NARA. This report demonstrates how your organization is achieving the goals of the *Directive* and other important initiatives as identified by NARA.

NARA uses the reports to determine the overall progress of the Federal Government in meeting the goals of the *Directive* transitioning to electronic recordkeeping. Additionally, NARA uses the report for information sharing purposes to provide best practices and model solutions with Federal agencies.

The reporting period begins on January 8, 2018 and reports are due back to NARA no later than March 16, 2018.

NARA plans to post your 2017 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 progress through December 31, 2017.
- 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 PRMD@nara.gov. Include the words "SAORM 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: Anthony C. Thompson
- Position title: Executive Director
- Address: 1155 21st St. NW, Washington DC, 20581
- Office telephone number: 202-418-5770

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM?**

   Please provide list Commodity Futures Trading Commission (CFTC)

2. **Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)**

   ☐ Y es**X**
   ☐ N o

   Please explain your response:
   Most of the CFTC's permanent records are maintained by one custodial Office. This Office has completed the transition to storing the vast majority of its permanent records in an electronic repository. We have written procedures and have conducted training for staff on the electronic repository. Our next step is to work on a concept of operations for improving the receipt, distribution, maintenance, and retrieval of these electronic permanent records. Additionally, we will be converting certain existing electronic permanent records of this Office that are not already in PDF/A format to the PDF/A format to ensure that we will be able to transfer them to NARA when the time comes. Finally, there is a small subset of records managed by this Office that are not part of the aforementioned electronic repository and the Office is working creating an electronic repository for these records as well.

   With a few exceptions, most of the remainder of CFTC's permanent records are already created electronically. For those not created electronically, some are part of business process transformations, which will result in records that are created and managed electronically. We are making progress toward managing these records electronically as the timelines for these business process transformations or our resources permit.

3. **Has your agency developed plans or taken actions to evaluate and implement the digitization of permanent records created in hard copy or other analog formats (e.g., microfiche, microfilm, analog video, analog audio)? (M-12-18 Goal 1.1)**

   ☐ Y es**X**
   ☐ N o

Please explain your response and include any obstacles you are facing in planning or implementing digitization initiatives.

Generally, CFTC's approach is to focus its finite resources on developing systems and processes to create and manage new permanent records in electronic format. For those permanent records that already exist in hard copy or other analog formats, CFTC will continue to maintain those records in those formats, as it does not have the resources to digitize all of them in a wholesale fashion. However, as business process transformation projects involve these records, there are sometimes opportunities to convert these analog records to digital formats.

4. **OMB M-17-22 required agencies to create reform plans that may result in re-organizations and the elimination of offices and/or functions. Where necessary, has your agency taken steps to ensure that recordkeeping requirements and other records management needs have been or will be accounted for and implemented when making these changes?**

☐ Y es**X**
☐ N o

Please explain your response:

We are in the process of reconfiguring the Records Liaison role in response to some re-organization that has already occurred. Additionally, the Records Management Office will be notified of any subsequent re-organizations to ensure that any recordkeeping requirements and other records management needs will be accounted for in any organizational changes.

5. **Have you, as the SAORM, taken steps to ensure that your records management program has the strategic direction, support and resources it needs to be successful?** (see: NARA Bulletin 2017-02: Guidance on Senior Agency Officials for Records Management https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html)

☐ Y es**X**
☐ N o

Please explain your response

For 2017 and several previous years, the SAORM secured funding for contractor resources to move forward on several important, major records management initiatives, including Capstone and the revision of the agency's comprehensive records disposition schedules. These efforts would not have been possible without these dedicated contract resources. Regarding strategic direction, the SAORM and the Records Management Officer meet on a monthly basis to discuss the progress and direction of these and other records management initiatives.

6. **Have you, as the SAORM, ensured that all incoming and outgoing senior officials* receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements.**

*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.

☐ Y es**X**
☐ N o

Please explain your response:

All Senior Officials receive incoming and outgoing briefings on their records management responsibilities. Both incoming and outgoing briefings include use of personal email, their responsibilities under Capstone, and the handling of records of their offices, with particular attention to the permanent records.

7. **Is the records management program and related requirements included in your agency's Information Resource Management Plan or an equivalent information management plan? (OMB Circular A-130, Managing Information as a Strategic Resource)?**

☐ Y es**X**
☐ N o

Please explain your response:

CFTC has accomplished most of the broad steps in OMB Circular A-130 including designating a SAORM; making progress toward the M-12-18 directive goals to manage permanent records electronically and transfer them to NARA in electronic format and to manage email records electronically in an electronic system; developing training for all employees; and having business practices that incorporate records management into the information system life cycle processes. We continue to intertwine records management within the agency's information resources management strategy and plans in accordance with OMB Circular A-130.

8. **What policies, guidance or support do you need from NARA to ensure a successful transition to fully electronic recordkeeping? (NARA Strategic Plan. Goal 2.4)**

More outreach and partnerships between the federal IT community (and potential other stakeholder communities) and the records management community to educate about the importance of addressing fully electronic recordkeeping during business process transformation efforts, as these efforts are the opportune time to address recordkeeping.