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.

The reporting period begins on <u>March 11, 2019</u> with reports due back to NARA no later than <u>April 19, 2019</u>.

NARA plans to post your 2018 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, 2018.
- 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 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 NW, Washington DC, 20581

1. **What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.**

   Please provide list: Commodity Futures Trading Commission

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)**

   ☐ Yes**x**
   ☐ No

   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. This year we made progress toward this goal by completing the concept of operations to improve the receipt, distribution, maintenance, and retrieval of these electronic permanent records. Our next step is to further identify ways to improve the receipt, distribution, maintenance, and retrieval of these electronic permanent records. 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 creating an electronic repository for these records as well.

   With a few exceptions, most of the remainder of CFTC's permanent records, not managed by the custodial Office mentioned above, 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. CFTC continues to make progress toward managing these records electronically as the timelines for these business process transformations or our resources permit.

3. **Has your agency implemented a plan that aligns to the criteria and requirements published by NARA in its *Criteria for Successfully Managing Permanent Electronic Records* (March 2018)?**

   ☐ Yes**x**
   ☐ No

Please explain your response:
We have begun work on a plan to align with these requirements, and we are exploring how the agency might use the Universal ERM Requirements to drive development and implementation of records management controls in records repositories containing permanent records. CFTC has already performed a number of the recommended operational activities contained in the "Criteria for Successfully Managing Permanent Records," For example, CFTC recently conducted a complete records inventory and drafted a new comprehensive records schedule. This effort included validating and/improving records schedules for permanent records so that they can be applied to electronic records.

4. **As included in the Administration's *Delivering Government Solutions in the 21st Century: Reform Plan and Reorganization Recommendations* (June 2018), NARA will no longer accept paper records after December 31, 2022. Is your agency developing strategic plans, goals, objectives, and initiatives that will enable it to comply with this deadline?**

   The Reform Plan states:
   Transition to Electronic Environment: *Transition Federal agencies' business processes and recordkeeping to a fully electronic environment, and end the National Archives and Records Administration's acceptance of paper records by December 31, 2022. This would improve agencies' efficiency, effectiveness, and responsiveness to citizens by converting paper-based processes to electronic workflows, expanding online services, and enhancing management of Government records, data, and information.*

   ☐ Yes**x**
   ☐ No

   Please explain your response (include specific goals and example metrics):
   CFTC has a plan to meet the December 31, 2022 deadline. The agency met its CY 18 goal to identify the permanent, analog records that are affected by this deadline and the potential extent of the processing work necessary to get these records ready to be direct-offered to NARA or sent to a Federal Records Center. Some of CFTC's plans are contingent on securing (or continuing) funding for the processing work required to meet this goal.

   Also, as mentioned in the answer to question 2 above, 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. CFTC continues to make progress toward managing these records electronically as the timelines for these business process transformations or our resources permit.

5. **Is your agency utilizing General Service Administration's Schedule 36 to procure solutions to assist in transitioning to an Electronic Environment?**

   ☐ Yes**x**
   ☐ No

Please explain your response:
CFTC used GSA Schedule 36 to procure services related to implementing Capstone and revising the agency comprehensive records disposition schedule.

6. **Have you, as the SAORM, established or improved your agency procedures that ensure 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.

   ☐ Yes
   ☐ Changes were unnecessary (click here for your agency's 2017 report) **X**
   ☐ No, changes are being considered but have not been made
   ☐ No

   Please explain your response:
   Aside from updating CFTC's training materials, it was not necessary to make changes to our practices for briefing incoming and outgoing Senior Officials during CY18. All Senior Officials continue to 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. **Have you, as the SAORM, ensured that your records management program has the support and resources it needs to be successful? (See NARA Bulletin 2017-02: *Guidance on Senior Agency Officials for Records Management*)**

   ☐ Yes**x**
   ☐ No

   Please explain your response:
   During CY18, the SAORM ensured that funding was available for contractor resources to allow the records management program to continue moving forward on several important, major records management initiatives, including Capstone, the revision of the agency's comprehensive records disposition schedules, and toward the December 31, 2022 goal. These efforts would have stalled without these dedicated contract resources. Regarding strategic direction, the SAORM and the Records Management Office continue to meet on a regular basis to discuss the progress and direction of these and other records management initiatives.

8. **Have you, as the SAORM, implemented an appropriate role-based records management training program that covers recordkeeping responsibilities for all staff including those with dedicated records management roles, Federal employees, contractors, senior executives and appointees? (See NARA Bulletin 2017-01: *Agency Records Management Training Requirements*)**

   ☐ Yes**x**
   ☐ No

   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. All staff, including Senior Officials, are required to take annual, computer-based Records Management Training. Records Liaisons also receive training on their responsibilities.

9. **Have you, as the SAORM, taken steps to direct and support Records Management staff in implementing an evaluation or auditing process to ensure records management directives, policies, procedures, and retention schedules are being properly implemented?**

   ☐ Yes**x**
   ☐ No

   Please explain your response:
   CFTC is a small, resource-constrained agency and as such, formal evaluations have not been part of our routine operations in the past. However, evaluations are part of CFTC's FY20 Capstone plans and its plans to implement the agency's comprehensive records schedule (after it is approved by NARA).

10. **Do you need support from NARA to ensure a successful transition to fully electronic recordkeeping?**

    ☐ Yes**x**
    ☐ No

    Please explain your response:
    CFTC would benefit from additional guidance on conducting evaluations of Capstone implementations. We are looking forward to the possible forthcoming NARA guidance that was mentioned in NARA's 2018 "Capstone Assessment."