



Senior Agency Official for Records Management 2019 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. This year's SAORM report provides an opportunity for agencies to report on plans and progress towards the milestones and target goals in this memorandum, as well as other important records management initiatives.

The reporting period begins on January 13, 2020, with reports due back to NARA no later than March 13, 2020.

NARA plans to post your 2019 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, 2019.
- 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 2019 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](#)

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 managing all permanent electronic records in electronic format as of December 31, 2019? (M-19-21, 1.1)**

- Yes No

Please explain your response:

[While there remain opportunities to improve the systems and processes used to manage some of the records, the CFTC is managing the vast majority of its permanent electronic records in electronic format as of December 31, 2019.](#)

3. **Has your agency made progress towards managing all permanent records in an electronic format with appropriate metadata by December 31, 2022? (M-19-21, 1.2)**

- Yes No

Please explain your response (include specific goals and example metrics):

[Some of permanent electronic records currently meet the transfer guidance criteria and metadata requirements for transfer to the National Archives. In the coming year, we will be exploring whether others meet the transfer criteria and metadata requirements. Additionally, we have already sent the majority of our legacy, permanent paper records to a Federal Records Center or transferred them to the National Archives; well in advance of the December 31, 2022 deadline.](#)

4. **Has your agency made progress towards managing all temporary records in electronic format? (M-19-21, 1.3)**

- Yes
 No

Please explain your response (include specific goals and example metrics):

CFTC has a rough list of records still being created in non-electronic format. The next steps are to determine if there are any planned business transformation efforts for these records, which we may be able to partner. Also, as part of the rollout of the agency's new, largely comprehensive records schedules, we plan to identify any additional records still being created in paper format. We will pursue these goals over the next several years as our resources permit.

- 5. Have you, as the SAORM, taken steps to ensure that your records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures? (M-19-21, 1.4)**

- Yes
 No

Please explain your response (include specific goals and example metrics):

CFTC has performance goals, objectives, and measures specific to records management in operational plans. Additionally, regarding strategic direction, the SAORM and the Records Management Office continue to meet on a regular basis to discuss the progress and direction records management goals and initiatives.

- 6. If applicable, have you identified all agency-operated records centers and made plans to either close them before 2022, or have you submitted a request to NARA for an exception? (M-19-21, 1.3)**

- Yes
 No

Please explain your response (include specific goals and example metrics):

Not applicable

- 7. Does your agency have procedures that include documentation to ensure records of outgoing senior officials* are properly captured and/or processed and not improperly removed, altered, or deleted including electronic records and email?**

*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

No

Please explain your response (include specific details of procedures):

CFTC has procedures to ensure that records of outgoing senior officials are captured and processed. Records management staff begin to coordinate with senior officials prior to their departure to ensure that records are transferred to the office that will have custody of the record after the senior official's departure. Specifically, with respect to email processing, we provide instructions for senior officials and/or their assistants to manually remove their personal files and information from their email records before they are captured. CFTC also has automated means of removing non-record materials from captured email records, and then those records are stored in a secure, permissioned repository, where they are searchable by authorized users until eventual transfer to NARA.

8. Do you, as the SAORM, see challenges within your agency in meeting the goal of fully-electronic recordkeeping?

Yes

No

Please explain your response (include details of specific challenges, if applicable):

The volume of electronic records, the number of different systems in which these records reside, and the sheer number and complexity of electronic recordkeeping requirements that must be implemented across these systems and records in order for an agency to be considered compliant far outstrip agency resources to meet the goal of fully-electronic recordkeeping. Additionally, it continues to be a challenge to insert records management controls into the information systems development lifecycle processes.

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

Yes

No

Please provide details on what support is needed:

Integrating records controls into information systems is an ongoing records management challenge. One way to legitimize and elevate recordkeeping controls and requirements to the IT community might be to incorporate controls into NIST standards and special publications that the IT community already uses and understands. Perhaps NARA and NIST might consider collaborating to produce a records management set of controls or framework along the same lines as NIST-800-53, Appendix J Privacy Controls and the recently published, NIST Privacy Framework. Given the sheer magnitude of the goal of transitioning to fully-electronic recordkeeping, something similar to the NIST Privacy Framework that would allow agencies to take a risk-based approach to their Records Management programs could be a very effective way of a targeting and funneling funding and resources to records and systems in a way that is aligned with the overall agency mission and risks.