



## *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](mailto: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: **Kate Higginbothom**
- Position title: **Deputy Staff Director – Mgmt. & Administration**
- Address: **1050 First Street, NE, Washington, DC 20463**

- 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:* Federal Election 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:*

As of December 31, 2019, the FEC was not managing all permanent electronic records in an electronic format. The FEC has a Commission-approved Records Management Directive covering all records, including electronic records, and an Email Management Policy. However, the agency does not a final agency-wide policy regarding non-email electronic records. The FEC's Acting Agency Records Manager and I intend to continue work on such a policy during this fiscal year, though formal adoption of an agency-wide policy cannot be completed until the Commission regains a quorum.

FEC electronic information systems are capable of creating, capturing, and maintaining permanent electronic records. Permanent electronic records have been identified in most cases. However, alignment with approved records schedules is still under development, and additional time is needed to ensure 100 percent compliance with the requirement that all permanent electronic records are maintained in electronic format.

**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):*

In FY 2019, the FEC made important progress toward managing all permanent records in an electronic format with appropriate metadata by 2022. In support of that goal, the Commission received approval from NARA for its Capstone Email Records Management Schedule, which the agency is currently working to fully implement. The Commission also received approval from NARA for its Commission Meeting Records Schedule, which covers permanent records maintained by the Commission Secretary's Office. The FEC is seeking approval of its January 2018 request, pending with NARA, to electronically maintain all records associated with the Office of Alternative Dispute Resolution's case files, as NARA seeks to finalize and formally add to its regulations digitization standards applicable to paper records that are ultimately digitized. FYs 2020 and 2021 will bring continued focus on updating the agency's records schedules in compliance with the requirements of OMB M-19-21, as nearly all existing agency schedules require changes; updating the agency's Records Management Program; and training all staff on the agency and government-wide records schedules, policies and responsibilities

**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):*

The FEC has not yet made progress toward managing all temporary records in electronic format, as the agency is currently focused on working toward managing all permanent records in electronic format. We intend to work toward managing temporary records in electronic format beginning in FY 2021.

**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):*

As SAORM, I work extensively with the FEC's Acting Records Officer to help ensure that the agency's records management program complies with the Federal Records Act and its regulations. The FEC has in place a Commission-approved Records Management Directive covering all agency records, and a Commission-approved Email Management Policy. A more formal policy regarding non-email electronic records management is under development, though adoption of this policy is subject to the Commission regaining a quorum of commissioners. The FEC also has as part of the agency's performance measures in its Annual Financial Report "meet[ing] the Records Management Presidential Directive milestones."

In the past year, I have sought and received agency-head approval for additional resources to support the FEC's records management program. In late-FY 2019, I obtained approval from the Commission's Finance Committee to fund a records management consulting services contract to assist with implementation of the FEC's NARA-approved Capstone Email Records Management Schedule. Earlier this year, I obtained approval from the Commission's Personnel Committee to hire a Records Manager, which will be the FEC's first staff position dedicated full-time to records management. I am also proactively supporting development of an updated agency-wide role-based records management training program utilizing the new NARA training modules.

**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. The FEC does not maintain any agency-operated records centers.

**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):*

The FEC's Email Management Policy prohibits senior officials (all of whose email accounts have designated as Capstone accounts) from deleting or culling any email messages that constitute federal records. The policy advises employees that "the willful culling of any email in violation of 18 U.S.C. 2071, and may subject the user to criminal and/or administrative penalties." Email records of senior officials are automatically maintained electronically in accordance with the agency's NARA-approved Capstone Email Records Management Schedule.

The FEC does not have in place specific policies or procedures to ensure that all non-email records of outgoing senior officials are properly captured and/or processed and maintained. The FEC's Acting Records Officer is currently working on role-based records management training for all agency employees, including senior officials, which we expect to launch this year. We will also be working to develop a more comprehensive records management program policy to address records of senior officials and corresponding procedures.

**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):*

**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:*

The FEC could use further guidance from NARA on best practices that it recommends, or that other agencies have developed and utilized, for transitioning to fully-electronic recordkeeping. As a small agency, the FEC has limited staff and budgetary resources to devote to its records management program, so we would benefit greatly from learning what best practices other agencies have developed to effectively implement the requirements of OMB Memorandum M-19-21.