



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 - Kimberly D. Bose
- Position title - Secretary of the Commission
- Address - 888 1st Street NE, Washington, DC 20426

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 Energy Regulatory Commission (FERC)

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:

- The agency permanent records are captured in an electronic format and maintained in multiple electronic information systems; such as, eLibrary SharePoint, and on our external website.

Our electronic information systems, which are used to capture, maintain and preserve the Commission records throughout their lifecycle, meets the agency business needs and manages it's records accordingly. We have a FY 21 effort to develop records management tools and functionalities required to successfully manage electronic records.

- The Capstone Records Schedule was approved on May 14, 2018. Upon approval, the FERC implemented its plan to maintain the Chairman and Commissioner's emails for ten years after separation from the agency then transfer them to NARA for permanent preservation.

All other emails are maintained for ten years after separation from the agency then deleted.

- The Commissions approved Records Management Policy, which includes electronic records requirements ensures that permanent records are managed accordingly and provided to NARA in a NARA-accepted format or that they are converted to an acceptable format without loss of data or integrity.
- Records scheduling efforts began in 2017 with priority emphasis on unscheduled records. All permanent records are captured in an electronic format and the Commission submitted one record schedule in 2019.
- Records Management incorporated permanent record series and records retention rules in all program office file plans as another method to ensure that permanent records are retained and transferred to NARA in accordance with approved records schedules and disposition instructions.
- Implementation of the Electronic Data Management Policy, which includes requirements and procedures for managing electronic data. This policy addresses the following criteria:
 - Establishing formally approved email policies,
 - Use of any automated systems for capturing email
 - Providing access / retrieval of email
 - Establishing disposition practices for agency email
 - Implementation of the Capstone approach for applicable agency email.
 - Providing accountability and management of the electronic data received and created
 - Managing FERC electronic records in accordance to the FERC Comprehensive Records Disposition Schedule, the National Archives and Records Administration's General Records Schedules and NARA implemented records management requirements.

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):

Yes, all of the agency permanent records are managed in an electronic format and are classified using the appropriate metadata such as, who created / received the record, what the record is, where the record came from and, when the records was created or received.

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):

Yes, all of the agency temporary records are managed in an electronic format and are classified using the appropriate metadata such as, who created / received the record, the records description, where the record came from and, when the records was created or received.

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):

Some of the steps taken to ensure the Commission records management program complies with the Federal Records Act and its regulations through strategic plans including performance goals, objectives and measures are as follows:

- Ensuring all records created and received contains adequate and proper documentation of the agency's, functions, policies, decisions, procedures, and essential transactions
- Meeting the M-19-21 Transition to Electronic Recordkeeping objective of managing all permanent and temporary records in an electronic format
 - All textual formatted records that have yet to meet their retention have been converted to an e-format, declared the official record (except for records with less than a two-year retention) and managed according to NARAs electronic recordkeeping requirements
- Annually (and on an ad hoc basis) informing all agency personnel of their records management responsibilities in law, regulation, and policy through mandatory records management training

- Updating and revising of all Records Management Policies and Guidance to support the Commission's transition to electronic recordkeeping

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):

The agency has a Records Maintenance Center (RMC), which is used as a temporary staging area for processing records eligible for transfer to the Federal Records Center.

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 Office of General Counsel requires all outgoing senior officials to complete and sign a FERC Documentary Materials Removal/Non-Removal Certification, Non-Disclosure Agreement, and Notice of Post-Employment Restrictions Form as a part of the exit review procedure.

The certification entails the documentary materials that are eligible for removal, records that may not be removed and the penalties for the lawful removal of records and is approved by the Designated Agency Ethics Official.

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:

I would like to know exactly what is needed to ensure a successful transition to electronic recordkeeping. What the minimal e-recordkeeping requirements are for our electronic information systems. What are the alternatives if the Commission is unable to meet some of the Federal recordkeeping requirements due budgetary issues, business needs etc. Are there any exceptions to policies? If so, what are they?