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 March 11, 2019 with reports due back to NARA no later than April 19, 2019.

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   Eric Broxmeyer
- Position title   General Counsel
- Address   800 N. Capitol Street NW
  Suite 565
  Washington, DC 20511

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: Privacy and Civil Liberties Oversight Board (PCLOB)

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)**

   X Yes
   ☐ No

   Please explain your response: As a relatively new agency, most of the PCLOB's records are created and maintained electronically. None of the PCLOB's permanent records exist only in hard copy.

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)?**

   X Yes
   ☐ No

   Please explain your response: The PCLOB has implemented a plan that aligns to the requirements in NARA's Criteria for Successfully Managing Permanent Electronic Records.

   The PCLOB has developed policies and training that informs personnel who create, receive, access, or use Federal records of their records management responsibilities. The PCLOB reviewed the policy this fiscal year with relevant stakeholders to ensure that it addresses the requirements in the Federal Records Act and NARA-/OMB-issued guidance.

   The PCLOB also works with system developers to ensure that records management requirements are included (when needed) throughout the system development process. This process also includes ensuring that appropriate cybersecurity and privacy controls

are built into these systems to protect the PCLOB's electronic records against unauthorized access, use, alteration, alienation, or deletion. Moreover, the PCLOB's electronic records are searchable, retrievable, and usable in our information systems.

The PCLOB has also developed NARA-approved records disposition schedules. As a relatively new agency, the PCLOB has not yet transferred any records to NARA. We look forward to working with NARA to develop an efficient process for transferring records under our disposition schedules.

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.*

    X Yes
    ☐ No

    Please explain your response (include specific goals and example metrics): As described above, the PCLOB is relatively new agency and most of our records are created and maintained electronically. The PCLOB complies with this deadline. None of the PCLOB's permanent records exist only in hard copy.

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: As described above, the PCLOB is relatively new agency and has no permanent records only in hard copy. Accordingly, the PCLOB began its records-focused operations in an electronic environment and did not need to utilize the General Service Administration's Schedule 36 to procure any solutions at this time.

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.

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

Please explain your response: All Board Members and employees complete a records management briefing during the onboarding and off-boarding process. These briefings occur on a Board Member's or employee's first and last day at the agency, respectively. These briefings occur in addition to annual records management training and explain all record keeping requirements. All personnel who complete the briefings verify that they have received on-boarding and off-boarding guidance.

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*)

 X Yes
 ☐ No

Please explain your response: The PCLOB hired a new agency records officer (ARO) in January 2019 as part of its commitment to building a leading records management program. The structure of the PCLOB also allows the SAORM, ARO, IT staff and other stakeholders to ensure that records management requirements are included at the beginning of the development life-cycle for information systems. Last, the PCLOB has developed a successful, working relationship with our NARA point-of-contact who supports the PCLOB with any matters related to our records program. NARA has been extremely helpful in the buildout of our records management program, which is important for a small agency like the PCLOB.

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*)

 X Yes
 ☐ No

Please explain your response: As described above, the PCLOB requires all Board Members and employees to complete records management training covering record keeping responsibilities for all personnel. This training is provided annually to all personnel as part of the onboarding process.

In addition, the PCLOB plans to ensure that the new ARO can attend training as part of the NARA's Federal records management certificate program. Completion of this program will help the person with dedicated records management responsibilities further build and refine the PCLOB's records management program.

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?**

> X Yes
> ☐ No

Please explain your response: The PCLOB's SAORM and ARO have taken initial steps to implement an evaluation and auditing process to ensure that records management, directives, policies, procedures, and retention schedules are being implemented. Additionally, the ARO is committed to working with NARA to build out the PCLOB's auditing process as soon as possible.

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

> X Yes
> ☐ No

Please explain your response: The PCLOB has fully implemented electronic record keeping. However, as described above, the PCLOB looks forward to working with NARA to help build upon PCLOB's initial efforts towards developing an evaluation and auditing process.