Senior Agency Official for Records Management
2018 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.

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 — Barry Walters
- Position title — Director, Office of Support Operations
- Address — 100 F Street NE, Room SP 2-2705
  Washington, DC 20549

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:

   The U.S. Securities and Exchange Commission (SEC)

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:

   The Office of Records Management Services (ORMS), which I oversee under the umbrella of the Office of Support Operations, issues SEC-wide guidance to ensure all agency divisions and offices create and/or maintain records in a manner that meets this requirement. The guidance includes a list of NARA's acceptable electronic formats and steps to take before transferring permanent records to NARA.

   Within this context, ORMS works with the Office of Information Technology (OIT) and the Office of Acquisitions to incorporate records management requirements into the systems development lifecycle, and issues standard language to include in all contracts involving the procurement of electronic information systems (EIS) that capture and maintain SEC records.

   Additionally, ORMS ensures the file plans and existing records schedules of the agency's divisions and offices are current and accurate, and recommends corrective action plans for any identified deficiencies. ORMS also works directly with the divisions and offices to guarantee records schedules are submitted to NARA as needed.

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:

As business processes evolve, my ORMS team remains focused on supporting SEC divisions and offices to ensure all permanent agency records created in hardcopy and analog formats are electronically captured and retained in a manner that is acceptable for accessioning to NARA.

As such, ORMS collaborates with other SEC staff to identify, catalog, and properly schedule records in all formats, including those maintained in an EIS. ORMS also requires designating as electronic the series media type of all new permanent records schedule submissions, unless there is a regulatory requirement or legitimate business need for maintaining the records in a non-electronic format. ORMS works with system development teams to ensure the full lifecycle management of record data—including end-of-cycle disposition actions—is built into system and process designs. In addition, ORMS provides OIT project managers with baseline records management requirements to use for all EIS initiatives that will contain records.

Finally, ORMS issues SEC-wide guidance to ensure all divisions and offices that create, receive, and/or maintain records meet these requirements. The guidance includes a list of NARA's acceptable electronic formats, as well as steps that divisions and offices must take prior to transferring permanent records to NARA.

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):

My ORMS team is working closely with OIT to identify and employ technological tools where necessary to meet these requirements.

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:

   The SEC has internal strategies in place that will not require the assistance of GSA's Schedule 36.

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:

   I ensure that all SEC personnel, including senior officials, complete formal records and information management training, and all senior officials are notified via written communications and provided on-demand verbal briefings regarding their Capstone Officials responsibilities.

Additionally, all departing staff—regardless of the type or duration of their appointment—must formally acknowledge that they followed instructions within the agency's Removal of Records and Non-Public Information by Departing SEC Personnel directive and did not remove documentary materials upon separation without obtaining the proper permissions or approvals. Personal materials (i.e., those solely for personal use and unrelated to agency business) need to be clearly labeled and maintained separately from office files. If

information about personal matters and agency-related business appear in the same document, it should be copied with the personal information deleted. The remaining, redacted document should be treated as a federal record. If a document does not qualify as a personal file, or if an individual is unsure whether a document is a personal file, he or she is required to consult with ORMS and, as appropriate, with the Office of the General Counsel and the Office of the Ethics Counsel before removing or disposing of the document.

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:

   I ensure that agency records are managed and treated as information resources in accordance with OMB Circular A-130. The SEC's Records and Information Management Program is governed by SEC Administrative Regulation (SECR 7-1), which prescribes policies and procedures regarding the creation, organization, maintenance, use, and disposition of all SEC records.

   My ORMS team also conducts biennial assessments and regular reviews of the program's activities and business practices to identify gaps, and maintains processes and procedures that are consistent with the requirements in OMB Circular A-130 and in compliance with all other federal regulations and SEC policies. ORMS' Records and Information Management Strategic Plan provides the strategic framework for planning, managing, and delivering information for all aspects of SEC records management in an effective and efficient manner. The core purpose is to use the agency's records and information assets to increase productivity, reduce costs, and meet legal requirements in service to the agency's mission and strategic goals. The strategic plan, at its highest level, lays out three major goals to ensure compliance with applicable federal laws related to records planning, controls, training, and other activities involved with records creation, maintenance and use, and disposition. The strategic plan also serves to achieve adequate and proper documentation of the policies and transactions of the SEC, as well as effective economical management of agency operations.

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:

Please refer to my response to question 6 above.

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:

In alignment with agency performance goals and objectives, my ORMS team has an established strategy for ongoing monitoring and review of program compliance that sets a clear system of accountability and responsibility for records management.

ORMS also conducts a thorough assessment of each SEC division and office records management program every two years. When deficiencies are identified, the responsible division or office must prepare a corrective action plan, track progress on a quarterly basis, and report completion when resolved.

As part of its Records Assessment Action Plan, ORMS requires agency-wide Records Liaisons to review and update file plans, essential records lists, and records inventories annually.

Finally, ORMS conducts yearly reviews of records management policies/guidance to incorporate changes in technology and/or compliance requirements.

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

☐ Yes
X No

Please explain your response:

The SEC does not require additional policies, guidance or support from NARA at this time.