



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
- Position title
- Address

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Executive Vice President and General Counsel
400 West Summit Hill Drive, WT6
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- 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:

This report will be all inclusive for the Tennessee Valley Authority (TVA).

- 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:

TVA manages permanent records in electronic format through the first two stages of the lifecycle - creation/receipt and maintenance/use. Records are maintained in OpenText ECM - an ERKS compliant platform which has the capability to manage the final stage of the lifecycle - disposition, as well as in other integrated data-specific platforms that meet business needs. Additional work is needed to effectively manage the records through the final stage to apply disposition rules, track trigger dates for closure, and transfer the permanent data to NARA.

- 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):

TVA is capturing the appropriate metadata for all permanent records that have been migrated to or now stored in OpenText ECM. TVA is currently assessing all other data-specific systems to ensure metadata is being captured consistent with NARA guidance. TVA is also reviewing each business area against the approved records schedule to account for permanent records and determine where gaps may exist. With these assessments complete, TVA will then design a strategic plan to be in compliance by the 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):

Similar to permanent records, TVA manages temporary records in electronic format for the first two stages of the lifecycle - creation/receipt and maintenance/use. Records are maintained in OpenText ECM - an ERKS compliant platform which has the capability to manage the final stage of the lifecycle - disposition, as well as in other integrated data-specific platforms that meet business needs. Additional work is needed to effectively manage the records through this final stage to apply disposition rules and track trigger dates for closure and subsequent destruction after retention is met.

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):

In FY20, the records management function at TVA transitioned to the Office of the General Counsel under new ARO and SAORM leadership. A strategic program plan was put in place to identify, assess, and address deficiencies in the program. Examples of deficiencies and corrective actions include:

(1) Creation of records management training program. *New employee training, annual recertification training, and role-based training implemented by 10/01/2020.* TVA is currently working with NARA to develop these training modules for inclusion in the Learning Management System (LMS) for mandatory assignment and is on track to meet this deadline.

(2) Enhancement of Records Liaison Program. *Assignment of key records management personnel for all business unit levels across TVA by 10/01/2020 with annual verification.* TVA has successfully stood up the Records Liaison Officer (RLO) program as of 03/10/2020 and designated RLOs at every business unit level. An RLO conference was planned for mid-April to promote records management, address role clarity, assign business partners within Enterprise Records, and kick off initiatives to further program compliance. Due to the COVID-19 pandemic, this effort is on hold as the Enterprise Records team considers other delivery and format options. An annual scorecard will be created later this year that tracks, among other things, a business unit's verification that a designated RLO is in place and active.

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):

TVA previously operated a 25,000 cubic foot records storage center in Knoxville, Tennessee. In early FY20, TVA dispositioned over 9,000 cubic feet of temporary records that were eligible for destruction and transferred over 1,000 cubic feet of permanent records to the Federal Records Center (FRC) in Ellenwood, GA. An additional 3,000 cubic feet of long term temporary records is currently under review for transfer to TVA's commercial storage facility at Iron Mountain, Boyers, PA or to the FRC. TVA has constructed a 10,000 cubic foot records staging area within its corporate office to hold active records needed for business use. The staging area will also be used to facilitate digitization projects, dispositions, and transfers to the FRC. With this work complete in mid FY20, TVA will close the 25,000 cubic foot records storage 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):

TVA has standard programs and processes (SPP) guidance in place to define the records management responsibilities of all TVA employees, including senior officials (as defined).

As part of the new program plan, TVA is developing role-based training specifically targeted to these officials and their executive management assistants to promote awareness of responsibilities and resources. This guidance and training will include governance of records maintained by presidential-appointees on the board of directors and records maintained by the corporate secretary. All executive management assistants and board counterparts have also been designated as Record Liaison Officers to ensure role clarity and connection to resources directly within the Enterprise Records program. The ARO or SAORM will have mandatory touch points for on-boarding and off-boarding these senior officials. These program components will be included in updated SPPs currently under review.

TVA previously implemented a Capstone email management program marking senior officials for permanent retention of email and new processes are in place to ensure changes to the personnel in these roles are quickly identified and captured. As TVA migrated to cloud storage, steps were taken to ensure capabilities were in place to archive accounts for senior officials for 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 following challenges have been identified:

TVA is working through hard spots to address the final stage of the records management lifecycle to apply trigger dates to certain record series to indicate closure and begin the retention period for future disposition.

An upgrade to the OpenText ECM system is needed to facilitate integration with other systems and improve the availability of vendor support. This will be a considerable undertaking with financial and staffing impacts.

TVA is also faced with a considerable volume of active long term temporary records. Digitization would facilitate better space management and access to the records for maintenance and use; however, those projects come at a high financial cost and commitment of time for review and quality control.

While TVA has identified these challenges, it is positioned to meet all NARA deadlines for compliance.

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:

TVA is currently working with the Federal Records Center staff in Ellenwood, GA, to identify projects that could be transferred for digitization.

TVA is also working with our newly designated NARA appraisal archivist to consider revisions to our Big Bucket schedule to provide more clarity and definition to retention guidance.

While the collaboration at the BRIDG meetings is extremely helpful, it would be beneficial if NARA could host sessions for agencies to come together on particular topics to discuss hard spots and solutions together.