



## *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: James T. Strawley
- Position Title: Deputy Staff Director
- Address: One Columbus Circle NE, Suite 2-500  
Washington, DC 2002

**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:*

*US Sentencing 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:*

The United States Sentencing Commission (“Commission”) has converted from a traditional, largely paper-based records management system to an electronic system for permanent records that will be sent to NARA. As part of this transition, the Commission undertook an effort to convert all paper-based permanent records to electronic format pursuant to its media-neutral records schedule. This was achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called “Oracle WebCenter Content”; we use an “Oracle WebCenter Content: Records” module specifically for records management. The two components collectively comprise the agency’s user-friendly records management system, known internally as “eCommission.”

As of the filing of this report, the Commission has completed the process of scanning all historical, paper-based permanent records. The Commission has also transferred its previously-created electronic files (e.g., pdf, Word, Word Perfect, Excel, and Power Point files) into the eCommission system – including all files that qualify as permanent records. Lastly, the Commission has instituted a process by which all contemporaneous permanent records are maintained and uploaded into eCommission in electronic format. The Metadata and filetype are maintained and each records also creates a PDF-A version of itself.

A similar process is also underway to achieve full digitalization of the Commission’s temporary records.

Once gathered and uploaded to eCommission, all records undergo a process to ensure proper disposition under the Commission's records schedule. Our records specialist, Brittany Davis, is responsible for moving the documents uploaded into the eCommission from the "documents" side to the "records" side of the eCommission (if the documents qualify as "permanent" records), pursuant to our CRDS. Once a file is moved to the "records" side, it is set for disposition in accordance with the CRDS (*i.e.*, depending on the document's creation date, it will be sent to NARA in electronic form). An electronic copy of all records remains in the eCommission after they are sent 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):*

See answer to #2 above. The Commission has converted from a traditional, largely paper-based records management system to an electronic system for permanent records that will be sent to NARA. As part of this transition, the Commission undertook an effort to convert all paper-based permanent records to electronic format pursuant to its media-neutral records schedule. This was achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called "Oracle WebCenter Content"; we use an "Oracle WebCenter Content: Records" module specifically for records management. The two components collectively comprise the agency's user-friendly records management system, known internally as "eCommission."

This system is in use for both historical, paper-based permanent records, as well as contemporaneous permanent records.

**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):*

See answer to #2 above. As it did with its historical, paper-based permanent records, the Commission is currently in the process of digitizing its collection of paper temporary records using an OCR scanner that meets NARA's specifications for digitization. Once digitized, these scanned temporary records are uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system, known internally as "eCommission."

Once gathered and uploaded to eCommission, all temporary records undergo a process to ensure proper disposition under the Commission's records schedule. Our records specialist,

Brittany Davis, is responsible for moving the documents uploaded into the eCommission from the “documents” side to the “records” side of the eCommission (if the documents qualify as “permanent” records), pursuant to our CRDS. Once a file is moved to the “records” side, it is set for disposition in accordance with the CRDS (*i.e.*, depending on the document’s creation date, it will be sent to NARA in electronic form). An electronic copy of all temporary records remains in the eCommission after they are sent to NARA.

**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):*

We have taken extensive steps to ensure that the Commission’s eCommission system is both secure and user friendly. All staff have received training on their records management responsibilities and how to use the eCommission to fulfill them. Dedicated individuals within units work with the SAORM and the ARO to ensure all records are moved to the eCommission using integration with our shared drive system or through manual upload. All metadata is kept through these uploads. The system is full text searchable making retrieval easy for all users. Once uploaded the records are converted into PDF/A and cannot be edited, moved, or deleted except by system admins. The system also allows for easy preparation of annual transfers to NARA and checked for quality by our ARO.

As part of the Commission’s onboarding process, all new employees (including senior officials) receive records management training. All senior Commission employees (Commissioners and senior staff) have been trained repeatedly on their records management responsibilities. Additionally, all employees are trained on the full functionality (including the search functions) of eCommission. The Commission has also recently added a requirement that exiting employees meet with the Records Officer as part of the documented exit process (as opposed to the undocumented process used before) to ensure all permanent or temporary records collected and maintained by the exiting employee are accounted for pursuant to the above processes.

I hold regular discussions regarding the record-keeping process with the agency’s Executive Official and the ARO in order to monitor the details of the Commission’s current records management processes. As part of these discussions, the ARO and I have discussed ongoing goals for the programs, possible methods to further improve the Commission’s processes and future requirements. In this regard, the Commission has taken or is taking several steps this year to continue the successful operation of its records program:

- In conjunction with the agency’s Executive Official, Office of General Counsel and the ARO, the Commission updated its records management policy, including the creation of a new written policy for distribution to all staff. That policy is made available on the Commission’s intranet.

- Historically, our records process involved informal consultations between the ARO and dedicated staff within each of the Commission's units to ensure all records are moved to the eCommission using integration with our shared drive system or through manual upload. This process has been formalized with each of the Commission's five operating units identifying an official Records Liaison for the unit.
- The Commission is in the process updating its records training module to better differential between staff record-keeping requirements and training on searching historical records and documents. We are also updating training programs for existing employees.

**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 USSC does not have 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):*

As noted, all employees receive training on record retention requirements. Additionally, the Commission has a requirement that exiting employees meet with the Records Officer as part of the documented exit process (as opposed to the undocumented process used before) to ensure all permanent or temporary records collected and maintained by the exiting employee are accounted for pursuant to the above processes. In this regard, the records officer is part of the notification system when an employee notifies the agency of a departure date, allowing ample time for the ARO to work with the employee to ensure all records are preserved.

**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 Commission has incorporated electronic recordkeeping into its records management program since the approval of the records schedule. As noted above, the Commission has converted from a traditional, largely paper-based records management system to an electronic system for permanent records that will be sent to NARA. As part of this transition, the Commission undertook an effort to convert all paper-based permanent records to electronic format pursuant to its media-neutral records schedule. This was achieved through use of OCR-enabled scanners and scanning software. Once digitized, these scanned records were uploaded to a DOD 5015.2 compliant, Oracle-based electronic documents-and-records-management system. That system is called "Oracle WebCenter Content"; we use an "Oracle WebCenter Content: Records" module specifically for records management. The two components collectively comprise the agency's user-friendly records management system, known internally as "eCommission."

As of the filing of this report, the Commission has completed the process of scanning all historical, paper-based permanent records, and is well underway for temporary records.

While not rising to the level of a significant challenge, the Commission continues to look forward to regulations from NARA regarding the disposal of hardcopy versions of permanent records that have been converted to an electronic format. The Commission maintains detailed inventory of all paper documents, so the absence of regulations adds an additional burden regarding records that have already been converted.

The Commission has processes in place for capturing email records, requiring users to forward any potential records to the Records Officer for review. The Commission continues to explore other options for greater automation in this process.

**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:*

As noted in the previous answer, the Commission looks forward to receiving regulations regarding the disposal of hardcopy versions of permanent records that have been converted to an electronic format. This guidance from NARA would provide beneficial to the Commission both in terms of its record-keeping workload and physical storage capacity.

The Commission would also further guidance from NARA regarding maintenance of email records, particularly insight regarding existing software to assist with the process of greater automation.