

04

SECTION

KEY STAKEHOLDERS

4. Key Stakeholders

4.1 Overview of Key Stakeholders

CIOs must maintain relationships with many stakeholders both within their agency and across the Federal government to effectively perform their duties. These stakeholders' roles and titles will vary from agency to agency, and it is common for one person to perform more than one of these functions simultaneously.

Agency CXOs are the executives who lead agency management functions, along with the [CIO](#) these roles are the [Chief Acquisition Officer \(CAO\)](#), [Chief Data Officer \(CDO\)](#), [Chief Financial Officer \(CFO\)](#), [Chief Human Capital Officer \(CHCO\)](#), and [Chief Information Security Officer \(CISO\)](#). Executives leading these management functions work closely with the Performance Improvement Office (PIO), agency head and [Chief Operating Officer \(COO\)](#) to ensure that mission support resources are effectively and efficiently aligned and deployed to achieve the agency mission. This includes such activities as routinely leading efforts to set goals, make results transparent, review progress, and make course corrections as needed to ensure that the agency's management functions are effective in supporting agency goals and objectives.

Beyond the "C-Suite" and their corresponding councils, CIOs also should maintain working relationships with their agency's Legislative Affairs office to ensure they are aware of Congressional proceedings or interests which may pertain to their agency's IT portfolio as well as their Senior Agency Official for Privacy (SAOP). OMB Desk Officers and Resource Management Officers (RMOs) are also key sources of support on management and budget topics, respectively.

4.2 Chief Acquisition Officer (CAO)²¹⁴

To ensure that acquisition issues receive high-level management attention, the Services Acquisition Reform Act of 2003 (SARA) established the position of the CAO. CAOs work closely with other senior executives government-wide and within their agencies to continuously improve the federal acquisition system. CAOs have several major areas of prioritized responsibility:

- Buy Smarter: CAOs should work with CFOs, CIOs, and CHCOs to increase the agency's use of government-wide and agency-wide strategic sourcing vehicles will save money and reduce duplication. supporting the agency's CIO in ongoing IT portfolio investment reviews, and working with the CFO to target administrative savings opportunities, will also help the agency buy smarter.
- Strengthen the Acquisition Workforce: CAOs should work with the agency's CHCO and principal program managers to develop and implement the annual Acquisition Human Capital Plan, and work with the CIO to determine how best to support IT acquisition, such as through the development of specialized IT acquisition cadres.
- Building the Right Supplier Relationships: CAOs should lead efforts to, among other things, improve the value of contractor past performance assessments and increase the transparency

²¹⁴ OMB. Clarifying Chief Acquisition Officer Roles and Responsibilities. 10/18/2012.

<https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/procurement/memo/cao-roles-and-responsibilities.pdf>

of contractor business integrity data so that the Federal Government only does business with reputable firms.

- Advance Mission Performance: CAOs should also work closely with agency leaders, such as the COO, PIO, and key mission program managers that depend heavily on acquisition, to help define acquisition needs that will advance agency goals and objectives in the most cost-effective manner possible. CAOs should ensure acquisition strategies are aligned with, and driven by, mission program and performance objectives, such as those established in an agency's strategic plans, or those that support the achievement of agency priority goals.

CAO Council

The CAO Council was established pursuant to Section 16 of the Office of Federal Procurement Policy Act, as amended, 41 USC 403, et seq.²¹⁵ It is chaired by OMB's Deputy Director for Management²¹⁶ and consists of a diverse group of acquisition professionals in the Executive Branch established to provide a senior level forum for monitoring and improving the federal acquisition system.

The Council works closely with the Administrator, Office of Federal Procurement Policy, and the Federal Acquisition Regulatory Council to promote these business practices in the acquisition system. It promotes effective business practices that ensure the timely delivery of best value products and services to the agencies, achieve public policy objectives, and further integrity, fairness, competition, and openness in the federal acquisition system. CAO.gov is where the Council shares priorities, key technology policies, news, and the programs and events sponsored by the Council.²¹⁷

4.3 Chief Data Officer (CDO)²¹⁸

The CDO of an agency shall be designated on the basis of demonstrated training and experience in data management, governance (including creation, application, and maintenance of data standards), collection, analysis, protection, use, and dissemination, including with respect to any statistical and related techniques to protect and de-identify confidential data. The agency CDO will be a trusted partner for the agency CIO in developing and implementing policies and statutory requirements related to the management of agency data.

Agency CDO responsibilities include:

- [Responsible] for lifecycle data management;
- Coordinate with any official in the agency responsible for using, protecting, disseminating, and generating data to ensure that the data needs of the agency are met;
- Manage data assets of the agency, including the standardization of data format, sharing of data assets, and publication of data assets in accordance with applicable law;
- Ensure that, to the extent practicable, agency data conforms with data management best practices;

²¹⁵ 41 U.S.C. § 1101. Office of Federal Procurement Policy Act. <https://www.govinfo.gov/content/pkg/USCODE-2011-title41/pdf/USCODE-2011-title41-subtitle1-div1-chap11-subchap1-sec1101.pdf>

²¹⁶ OMB M-04-13. Chief Acquisition Officers Council. May 2004. <https://georgewbush-whitehouse.archives.gov/omb/memoranda/fy04/m04-13.html#att>

²¹⁷ CAO. Chief Acquisition Officers Council. <https://cao.gov/cao-home>

²¹⁸ 44 U.S.C. § 3520. Chief Data Officers. <https://www.law.cornell.edu/uscode/text/44/3520>

- Engage agency employees, the public, and contractors in using public data assets and encourage collaborative approaches on improving data use;
- Support the Performance Improvement Officer of the agency in identifying and using data to carry out the functions described in section 1124(a)(2) of title 31²¹⁹;
- Support the Evaluation Officer of the agency in obtaining data to carry out the functions described in section 313(d) of title 5²²⁰;
- Review the impact of the infrastructure of the agency on data asset accessibility and coordinate with the [CIO] of the agency to improve such infrastructure to reduce barriers that inhibit data asset accessibility;
- Ensure that, to the extent practicable, the agency maximizes the use of data in the agency, including for the production of evidence (as defined in section 3561²²¹), cybersecurity, and the improvement of agency operations;
- Identify points of contact for roles and responsibilities related to open data use and implementation;
- Serve as the agency liaison to other agencies and [OMB] on the best way to use existing agency data for statistical purposes (as defined in section 3561²²²).

CDO Council

The CDO Council established by the Evidence Act²²³ includes all agency Chief Data Officers, the Administrator of the Office of Electronic Government (or designee), the Administrator of the Office of Information and Regulatory Affairs (or designee), and an Ex Officio Member (to represent all Chief Information Officers and Evaluation Officers). The CDO Council meets regularly to:

- Establish government-wide best practices for the use, protection, dissemination, and generation of data;
- Promote and encourage data sharing agreements between agencies;
- Identify ways in which agencies can improve upon the production of evidence for use in policymaking; consult with the public and engage with private users of Government data and other stakeholders on how to improve access to data assets of the Federal Government; and
- Identify and evaluate new technology solutions for improving the collection and use of data.

The CDO Council's resources will reflect consultation with the public and engagement with private users of government data and other stakeholders on how to improve access to Federal data assets. In addition, the CDO Council will identify and evaluate new technology solutions for improving the collection and use of data. The CDO Council will share responsibility with other government-wide councils that conduct statutory, data-related activities, such as the Interagency Council on Statistical Policy (ICSP) and the Evaluation Officer Council. OMB expects that the activities of these multiple councils will be coordinated through the OMB Federal Data Policy Committee.

²¹⁹ 31 U.S.C. § 1124(a)(2). Performance Improvement Officers.

https://www.law.cornell.edu/uscode/text/31/1124#a_2

²²⁰ 5 U.S.C. § 313(d). Evaluation Officers. <https://www.law.cornell.edu/uscode/text/5/313#d>

²²¹ 44 U.S.C. § 3561. Definitions. <https://www.law.cornell.edu/uscode/text/44/3561>

²²² Ibid.

²²³ Public Law 115-435. Foundations for Evidence-Based Policymaking Act of 2018.

<https://www.congress.gov/bill/115th-congress/house-bill/4174>

4.4 Chief Financial Officer (CFO)

The agency CFO delivers timely, accurate, and reliable financial information to decision makers through efficient and effective financial systems and business processes, fosters effective stewardship of public funds, and safeguards fiscal integrity through effective internal controls. The CFO ensures compliance with federal financial integrity legislation, including the CFO Act. The Office of the CFO leads efforts to examine, identify, and implement administrative cost reduction initiatives and improve efficiencies across the agency.

An agency CIO should partner with the CFO to effectively manage the agency's IT budget and portfolio. Aligning IT investments to the agency's strategic business plans will ensure that IT investments are viewed as a key part.

An agency CFO is to report directly to the agency head on financial management matters. The CFO's responsibilities are to include the following:

- Developing and maintaining integrated accounting and financial management systems;
- Directing, managing, and providing policy guidance and oversight of all agency financial management personnel, activities, and operations;
- Approving and managing financial management systems design and enhancement projects;
- Developing budgets for financial management operations and improvements;
- Overseeing the recruitment, selection, and training of personnel to carry out agency financial management functions;
- Implementing agency asset management systems, including systems for cash management, credit management, debt collection, and property and inventory management and control; and
- Monitoring the financial execution of the agency budget in relation to actual expenditures.²²⁴

CFO Council

The CFO Council was established by the Chief Financial Officers Act of 1990²²⁵ to advise and coordinate the activities of the member agencies. The CFO Council is composed of CFOs and Deputy CFOs of large federal agencies, the Deputy Director for Management at OMB chairs the organization. It was established to advise and coordinate on member agency matters, including:

- Consolidating and modernizing of financial systems;
- Improving the quality of financial information;
- Financial data and information standards;
- Internal controls;
- Legislation affecting financial operations and organizations; and
- Any other financial management matters.

²²⁴ GAO. The Chief Financial Officers Act. September 1991. <https://www.gao.gov/special.pubs/af12194.pdf>

²²⁵ Public Law 101-576. Chief Financial Officers Act of 1990. <https://www.govinfo.gov/content/pkg/STATUTE-104/pdf/STATUTE-104-Pg2838.pdf>

CFO.gov is where the Council shares priorities, key technology policies, news, and the programs and events sponsored by the Council.²²⁶

4.5 Chief Human Capital Officer (CHCO)

The agency CHCO plays an important role in supporting agency strategic planning and performance improvement efforts by ensuring human capital plans, strategies, and investments advance organizational goals set forth in the agency's strategic and annual plans. Each CHCO serves as their agency's chief policy advisor on all human resources management issues and is charged with selecting, developing, training, and managing a high-quality, productive workforce. The chief functions of the agency CHCO include:

- Setting the workforce development strategy of the agency;
- Assessing workforce characteristics and future needs based on the agency's mission and strategic plan;
- Aligning the agency's human resources policies and programs with organization mission, strategic goals, and performance outcomes;
- Developing and advocating a culture of continuous learning to attract and retain employees with superior abilities;
- Identifying best practices and benchmarking studies, and
- Applying methods for measuring intellectual capital and identifying links of that capital to organizational performance and growth.²²⁷

CHCO Council

The CHCO Council was formally established by the Chief Human Capital Officers Act of 2002. The Act provides that the Director of OPM serves as Chairperson of the Council, and the Deputy Director for Management of OMB serves as Vice Chairperson. The members of the CHCO Council include the Director of OPM, the Deputy Director for Management of OMB, and Chief Human Capital Officers of Executive Departments. Other members may be designated by the Chairperson including CHCOs of other Executive Agencies and members designated on an ex officio basis.

The purposes of the Council are to:

- Advise OPM, OMB, and agency leaders on human capital strategies and policies, as well as on the assessment of human capital management in Federal agencies.
- Inform and coordinate the activities of its member agencies on such matters as modernization of human resources systems, improved quality of human resources information, and legislation affecting human resources management operations and organizations.
- Assist member CHCOs and other officials with similar responsibilities in fulfilling their individual responsibilities to:
 - Implement the laws governing the Federal civil service, as well as the rules and regulations of the President, OPM, and other agencies with regulatory authority that affects Federal employees;

²²⁶ CFO. Chief Financial Officers. <https://www.cfo.gov/about-the-council/>

²²⁷ Public Law 107-296. Chief Human Capital Officers Act of 2002.
https://www.dhs.gov/xlibrary/assets/hr_5005_enr.pdf

- In accordance with those laws and regulations, advise and assist agency heads and other senior officials in carrying out their responsibilities for selecting, developing, training, and managing a high-quality, productive workforce in accordance with merit system principles;
- Assess workforce characteristics and future needs and align the agency's human resources policies and programs with the agency's mission, strategic goals, and performance objectives;
- Advocate and assure a culture of continuous learning and high performance, developing and implementing effective strategies to attract, develop, manage, and retain employees with superior abilities;
- Identify human capital best practices and benchmarks and apply those exemplars to their agencies and the Federal Government as a whole.
- Provide leadership in identifying and addressing the needs of the Federal Government's human capital community, including training and development.

CHCOC.gov is where the Council shares priorities, key technology policies, news, and the programs and events sponsored by the Council.²²⁸

4.6 Chief Information Officers Council (CIOC)²²⁹

CIOs from the 24 CFO Act agencies are invited and encouraged to participate in the CIO Council which was codified into law under the e-Government Act of 2002²³⁰. The CIO Council is the principal interagency forum for improving agency practices related to the design, acquisition, development, modernization, use, sharing, and performance of Federal information resources.

The U.S. federal CIO and the CIO Council establish standards against which the success of all agency programs can be measured, including:

- Monitoring the year-to-year performance improvement of Federal Government programs
- Attracting and retaining a high-performance IT workforce
- Optimizing Federal Government information resources and investments
- Aligning IT solutions with Federal enterprise business processes
- Adopting and sharing best IT management practices
- Managing risk and ensuring privacy and security

The e-Government Act of 2002²³¹ outline the CIO Council's responsibilities which include:

1. Developing recommendations for the Director of OMB on government information resources management policies and requirements;
2. Sharing experiences, ideas, best practices, and innovative approaches related to information resources management;

²²⁸ Ibid.

²²⁹ CIO Council. <https://www.cio.gov/about/vision/>

²³⁰ Public Law 107-347. e-Government Act of 2002. <https://www.congress.gov/107/plaws/publ347/PLAW-107publ347.pdf>

²³¹ Ibid.

3. Assisting the Federal CIO in the identification, development, and coordination of multi-agency projects and other innovative initiatives to improve Government performance through the use of information technology;
4. Promoting the development and use of common performances for agency information resources management; and
5. Working with the Office of Personnel Management to assess and address the hiring, training, classification, and professional development of the Federal IT workforce.

The CIO Council has 4 committees and many working groups. The committees include:

- The Services, Strategies and Infrastructure Committee
- Innovation Committee
- IT Workforce Committee
- CISO Council

4.7 Chief Information Security Officer (CISO)²³²

The agency CISO plays a key role in working with the agency CIO to ensure information security requirements are properly implemented. In most cases, the agency's internal policies delegate management of the agency's information to the CIO, who has the authority under FISMA to delegate tasks related to information security to the agency CISO. FISMA does not instruct agencies on how to develop or maintain their information security programs; it simply lists agencies' information security responsibilities. As a result, no two CISO roles are exactly the same. Some CISOs are responsible for all information security tasks at their agency, while others work with separate operations centers or take on tasks outside of information security to help with organizational priorities. Although FISMA allows for these nuances, CIOs and CISOs are ultimately statutorily responsible for information security, so they must be aware of the range of information security responsibilities assigned to agencies.

An agency CIO should view their CISO as a trusted partner and advisor for developing and implementing information security requirements. While each agency's organizational and reporting structure may be different, building a productive relationship between the CIO and CISO is essential for effective IT and security management.

CISO Council

The CISO Council is a committee under the CIO Council led by the Federal CISO and an agency Vice-Chair. Its membership consists of agency CISOs from the 24 CFO Act Executive branch agencies.

4.8 Chief Operating Officer (COO)

As envisioned by the Government Performance and Results Act (GPRA) Modernization Act of 2010 (GPRAMA), the agency COO is responsible for providing overall organization management to improve and achieve the mission and goals of the agency. COOs provide organizational leadership to improve performance of both mission and management functions. They bring together other leaders and staff within the agency, including component managers, program and project managers, research and evaluation experts, and other leaders of key management functions such as the CIO, the CFO, the [CHCO], the CAO, and PIO. With leadership from the COO, these and other agency leaders collectively

²³² CIO Council. CISO Handbook. https://www.cio.gov/assets/resources/CISO_Handbook.pdf

solve problems and pursue opportunities that help the agency operate more effectively and efficiently.²³³

4.9 Office of Executive Councils

The Office of Executive Councils resides in the Office of Government-wide Policy at GSA. This office coordinates engagement and policy development across the CXO ecosystem. The Executive Councils consists of the following inter-agency communities:

- Chief Information Officers Council (CIOC)²³⁴
 - See [Chief Information Officers Council](#) section for full description.
- Chief Data Officers Council (CDOC)²³⁵
 - See [Chief Data Officer \(CDO\)](#) section for full description.
- Chief Acquisition Officers Council (CAOC)²³⁶
 - See [Chief Acquisition Officer \(CAO\)](#) section for full description.
- Chief Financial Officers Council (CFOC)²³⁷
 - See [Chief Financial Officer \(CFO\)](#) section for full description.
- Chief Human Capital Officers Council (CHCOC)²³⁸
 - See [Chief Human Capital Officer \(CHCO\)](#) section for full description.
- Federal Privacy Council (FPC)²³⁹
 - See [Senior Agency Official for Privacy \(SAOP\)](#) section for full description.
- Performance Improvement Council (PIC)²⁴⁰
 - See the [Performance Improvement Council \(PIC\)](#) section for full description.
- President's Management Council (PMC)²⁴¹
 - See the [President's Management Council \(PMC\)](#) section for full description.

4.10 OMB Budget Resource Management Offices (RMOs)²⁴²

OMB has five RMOs, organized by agency and by program area. These offices, together with OMB's Budget Review Division, help to carry out OMB's central activity of assisting the President in overseeing the preparation of the Federal Budget and supervising its administration of Executive Branch agencies.

²³³ OMB M-18-19. Improving the Management of Federal Programs and Projects through Implementing the Program Management Improvement Accountability Act (PMIAA). 6/25/2018. <https://www.whitehouse.gov/wp-content/uploads/2018/06/M-18-19.pdf>

²³⁴ CIO Council. <https://www.cio.gov/>

²³⁵ OMB M-19-23. Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance. 7/10/2019. <https://www.whitehouse.gov/wp-content/uploads/2019/07/M-19-23.pdf>

²³⁶ CAO. Chief Acquisition Officers Council. <https://cao.gov/cao-home>

²³⁷ CFO. About the Chief Financial Officers Council. <https://www.cfo.gov/about-the-council/>

²³⁸ CHCOC. Council Charter. <https://www.chcoc.gov/content/council-charter>

²³⁹ FPC. Vision and Purpose. <https://www.fpc.gov/learn-about-federal-privacy-program/>

²⁴⁰ PIC. Performance Improvement Council. <https://www.pic.gov/who-we-are/the-council/>

²⁴¹ GSA. President's Management Council (PMC). <https://www.gsa.gov/governmentwide-initiatives/shared-solutions-and-performance-improvement/presidents-management-council-pmc>

²⁴² The White House. The Mission and Structure of the Office of Management and Budget. https://obamawhitehouse.archives.gov/omb/organization_mission/#:~:text=In%20helping%20to%20formulate%20the,agencies%20to%20set%20funding%20priorities.

In helping to formulate the President’s spending plans, RMOs assess the effectiveness of agency programs, policies, and procedures, weigh competing funding demands within and among agencies, and help work with agencies to set funding priorities. Once the Budget is enacted, RMOs are responsible for the execution of Federal budgetary policies and provide ongoing policy and management guidance to Federal agencies. As part of these and other responsibilities, RMOs provide analysis and evaluation, oversee implementation of policy options, and support government-wide management initiatives.

Visit [MAX.gov](https://www.max.gov)²⁴³ to find agency assigned RMOs.

4.11 Performance Improvement Council (PIC)²⁴⁴

The PIC, a government-wide body that supports cross-agency collaboration and best practice sharing, was established under Executive Order 13450²⁴⁵ in 2007 and codified in law under the GPRA Modernization Act of 2010. The PIC is chaired by the Deputy Director for Management at OMB within EOP. The membership of the PIC includes PIOs and associated staff from federal agencies.²⁴⁶ PIC.gov is where the Council shares priorities, news, and information about key performance management topics.²⁴⁷

4.12 President’s Management Council (PMC)²⁴⁸

The PMC advises the President and OMB on government reform initiatives, provides performance and management leadership throughout the Executive Branch, and oversees implementation of government-wide management policies and programs. The PMC comprises the [COO] of major Federal Government agencies, primarily Deputy Secretaries, Deputy Administrators, and agency heads from GSA and OPM.

4.13 Congress / Legislative Affairs

Established by Article I of the Constitution, the Legislative Branch consists of the House of Representatives and the Senate, which together form the United States Congress. The Constitution grants Congress the sole authority to enact legislation and declare war, the right to confirm or reject many Presidential appointments, and substantial investigative powers.²⁴⁹

Within federal agencies are legislative affairs offices that coordinate legislative activity for the agency and serve as the primary liaison to Members of Congress and their congressional staff. They develop and implement strategies to advance their agency’s legislative initiatives, respond to inquiries from Congress, and keep senior leadership and OMB informed about the activities of Congress.

²⁴³ The website MAX.gov is only accessible to federal employees.

²⁴⁴ PIC. Performance Improvement Council. <https://www.pic.gov/who-we-are/the-council/>

²⁴⁵ The White House. Executive Order 13450 - Improving Government Program Performance. 11/13/2007. https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/performance_pdfs/eo13450.pdf

²⁴⁶ PIC. About the Council. <https://www.pic.gov/who-we-are/the-council/>

²⁴⁷ Ibid.

²⁴⁸ GSA. President's Management Council (PMC). <https://www.gsa.gov/governmentwide-initiatives/shared-solutions-and-performance-improvement/presidents-management-council-pmc>

²⁴⁹ The White House. The Legislative Branch. <https://www.whitehouse.gov/about-the-white-house/the-legislative-branch/>

Agency CIOs are subject to testify before Congress to articulate the agency's position on proposed legislation and/or progress towards initiatives, policies, and programs.

4.14 General Counsel

The General Counsel is the chief legal officer of the agency, providing legal advice and representation to GSA officials while ensuring implementation of GSA's statutory responsibilities. The lawyers within an agency's Office of General Counsel provide legal counsel to agency policy-makers, providing critical input to rules, regulations, and guidance documents that are promulgated and issued to implement an agency's statutory obligations. Each agency's OGC varies in organization and structure to meet individual agency-specific mission and needs.

An agency's general counsel can be an important partner for the CIO on a variety of IT-related initiatives. Your agency's GC will be a key stakeholder in IT procurement and contract management, as well as meeting policy and statutory requirements for IT management and information security compliance.

4.15 Senior Agency Official for Privacy (SAOP)²⁵⁰

The SAOP, designated by the head of each agency, has agency-wide responsibility for privacy, including implementation of privacy protections; compliance with Federal laws, regulations, and policies relating to privacy; management of privacy risks at the agency; and a central policy-making role in the agency's development and evaluation of legislative, regulatory, and other policy proposals.

- **Policy Making:** The SAOP shall have a central policy-making role in the agency's development and evaluation of legislative, regulatory, and other policy proposals that have privacy implications. In this role, the SAOP shall ensure that the agency considers and addresses the privacy implications of all agency regulations and policies, and shall lead the agency's evaluation of the privacy implications of legislative proposals, congressional testimony, and other materials pursuant to OMB Circular No. A-19.7.
- **Compliance:** The SAOP shall have a central role in overseeing, coordinating, and facilitating the agency's privacy compliance efforts. In this role, the SAOP shall ensure that the agency complies with applicable privacy requirements in law, regulation, and policy. Relevant authorities include, but are not limited to, the Privacy Act of 1974; the Paperwork Reduction Act of 1995; the E-Government Act of 2002; the Health Insurance Portability and Accountability Act of 1996; OMB Circular A-130; Privacy Act Implementation: Guidelines and Responsibilities; 13 OMB Circular A-108; OMB's Final Guidance Interpreting the Provisions of Public Law 100-503, the Computer Matching and Privacy Protection Act of 1988; and OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002.
- **Risk Management:** The SAOP shall manage privacy risks associated with any agency activities that involve the creation, collection, use, processing, storage, maintenance, dissemination, disclosure, and disposal of PII by programs and information systems. The SAOP's review of privacy risks shall begin at the earliest planning and development stages of agency actions and policies that involve PII and continue throughout the life cycle of the programs or information

²⁵⁰ OMB M-16-24. Role and Designation of Senior Agency Officials for Privacy. 9/15/2016.
https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2016/m_16_24_0.pdf

systems. Appropriately managing privacy risks may require agencies to take steps beyond those required in law, regulation, and policy.

Federal Privacy Council (FPC)²⁵¹

- The FPC is the principal interagency forum to improve the privacy practices of agencies and entities acting on their behalf. The work of the Federal Privacy Council shall strengthen protections of people's personal information and privacy rights across the Federal Government. To achieve this purpose, the Federal Privacy Council shall: support interagency efforts to protect privacy and provide expertise and assistance to agencies; expand the skill and career development opportunities of agency privacy professionals; improve the management of agency privacy programs by identifying and sharing lessons learned and best practices; and promote collaboration between and among agency privacy professionals to reduce unnecessary duplication of efforts and to ensure the effective, efficient, and consistent implementation of privacy policy government-wide.²⁵² FPC.gov is where the Council shares priorities, key privacy policies, news, and the programs and events sponsored by the Council.²⁵³

4.16 Senior Agency Official for Records Management (SAORM)²⁵⁴

The Federal Records Act (FRA) requires the head of each Federal agency to establish and maintain an active, continuing program for the economical and efficient management of the records of the agency. To this end, the SAORM acts on behalf of the agency head to ensure the agency efficiently and appropriately complies with all applicable records management statutes, regulations, NARA policy, and OMB policy. The SAORM bridges the gap between the agency head and the Agency Records Officer in order to provide strategic direction for the agency's records management program.

The SAORM also promotes effective records management at a senior level by seeing across program offices in the deployment of individual IT systems. The SAORM advocates for the records management program ensuring adequate resources are embedded into the agency's Strategic Information Resources Management (IRM) Plan.²⁵⁵ The SAORM must directly, and regularly, work with the Agency Records Officer and other appropriate officials to oversee the successful implementation of the agency's records management program.

The SAORM must coordinate the agency's records management program with other related disciplines such as information security, risk management, data management, and knowledge management. This may also include programs related to discovery, privacy, and the Freedom of Information Act (FOIA). As

²⁵¹ FPC. Vision and Purpose. <https://www.fpc.gov/learn-about-federal-privacy-program/>

²⁵² FPC. Vision and Purpose. <https://www.fpc.gov/vision-and-purpose/>

²⁵³ Ibid.

²⁵⁴ NARA Bulletin 2017-02. Guidance on Senior Agency Officials for Records Management. 9/28/2017. <https://www.archives.gov/records-mgmt/bulletins/2017/2017-02-html>

²⁵⁵ 44 U.S.C. §3506. US Federal Information Policy. Federal Agency Responsibilities. <https://www.law.cornell.edu/uscode/text/44/3506>

the agency's information framework develops and matures, the SAORM should integrate the records management program within the framework.

The SAORM's overall responsibilities include:

- Setting the vision and strategic direction for the agency records management program, including incorporating these goals into the agency's Strategic IRM Plan;
- Advocating for the agency's records management program and ensuring that it documents the organization's activities and decisions;
- Ensuring the agency protects records against unauthorized removal or loss and ensures all agency staff are informed of their records management responsibilities as defined in NARA regulations and guidance;
- Submitting reports to NARA, supporting records management inspections, and other oversight activities;
- Ensuring agency staff are informed of and receive training on their records management responsibilities as defined in NARA regulations and guidance;
- Formally designating the Agency Records Officer and informing NARA in writing of this decision; and
- Ensuring compliance with NARA requirements for electronic records including:
 - Managing all permanent electronic records electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format; and
 - Managing all email records electronically and retaining them in an appropriate electronic system that supports records management and litigation requirements, including the capability to identify, retrieve, and retain the records consistent with NARA-approved disposition authorities and regulatory exceptions.