



NATIONAL
ARCHIVES

OFFICE *of* INSPECTOR GENERAL

Evaluation of Records Request
Backlog at the National Personnel
Records Center (23-R-05)

May 5, 2023





Inspector General

May 5, 2023

TO: Debra Steidel Wall
Acting Archivist of the United States

FROM: Dr. Brett M. Baker
Inspector General

SUBJECT: *Evaluation of Records Request Backlog at the National Personnel Records Center*
OIG Report No. 23-R-05

Attached is the Office of Inspector General's final report of our *Evaluation of Records Request Backlog at the National Personnel Records Center*. The report contains seven recommendations to improve management oversight and accountability over the records request backlog at the NPRC. Agency staff indicated they had no comments for inclusion in this report.

Please provide planned corrective actions and expected dates to complete the actions for each of the recommendations within 30 days of the date of this report. As with all OIG products, we determine what information is publicly posted on our website from the published report. Consistent with our responsibility under the *Inspector General Act of 1978, as amended*, we may provide copies of our report to congressional committees oversight responsibility over NARA.

We appreciate the cooperation and assistance NARA extended to us during this evaluation. Please contact me with any questions.

Cc:
William J. Bosanko, Chief Operating Officer
Meghan Guthorn, Deputy Chief Operating Officer
Jay Trainer, Executive for Agency Services
Scott Levins, Director, National Personnel Records Center
Kevin Pratt, Chief of Staff, Agency Services
Micah Cheatham, Chief of Management and Administration
Sheena Burrell, Chief Information Officer
Valorie Findlater, Chief Human Capital Officer

Kimm Richards, Accountability

William Brown, Senior Program Auditor

Teresa Rogers, Senior Program Auditor

Senate Homeland Security and Governmental Affairs Committee

United States House of Representatives Committee on Oversight and Reform

Table of Contents

Executive Summary	4
Summary of Recommendations	5
Background	6
Evaluation Results	8
Finding 1. NPRC Continues to Maintain a Veteran Records Request Backlog Despite Efforts to Resolve It.....	8
Recommendations.....	15
Finding 2. Opportunities Exist for NPRC to Improve its Records Request Fulfillment Processes Moving Forward.....	16
Recommendations.....	20
Finding 3. Additional Controls Needed to Manage the Increase of Medical Emergency Requests.....	21
Recommendation	23
Appendix A – Objective, Scope, and Methodology	24
Appendix B – Acronyms	25
Appendix C – Agency Comments	26
Appendix D – Report Distribution List	27

Executive Summary

Evaluation of Records Request Backlog at the National Personnel Records Center

OIG Report No. 23-R-05

May 5 2023

Why Did We Conduct This Audit?

The objectives of the evaluation were to assess the backlog of records requests at the National Personnel Records Center (NPRC) and make recommendations to reduce the backlog and improve the process moving forward. The NARA Inspector General identified challenges with the NPRC backlog as a Top Management Challenge and received a request from the House of Representatives Committee on Oversight and Reform (COR) on October 20, 2021 to conduct an evaluation of the factors contributing to the backlog at NPRC, NARA's efforts to resolve it, and make recommendations for improvements.

What Did We Recommend?

We made seven recommendations to help efficiently reduce the current NPRC backlog, prevent significant backlogs in the future, and improve NPRC's personnel resources, communication practices, records request processes, and Information Technology (IT) infrastructure.

What Did We Find?

We found NPRC's backlog of unprocessed veteran records requests grew from a normal work in process level of 55,659 at the beginning of Coronavirus Disease 2019 (COVID-19) pandemic restrictions in March 2020 to as high as 603,663 on March 14, 2022. Factors causing NPRC's backlog include limited on-site staffing due to facility occupancy restrictions in place from March 2020 to February 2022, and NPRC having limited remote processing capabilities. With assistance from Veterans Affairs, funding from Congress, and easing of COVID-19 restrictions, NPRC was able to reduce the backlog by more than 37 percent from its highest point. Although NARA has put forth effort to reduce the backlog, more work needs to be done to ensure America's estimated 18.5 million living veterans are being serviced timely, and are receiving the records they need for service-related benefits and necessary medical treatment.

We also found opportunities exist for NPRC to improve its records request fulfillment processes moving forward. These opportunities include increased and improved system automation and improved communication with veterans. NPRC has not implemented sufficient internal control over its records request process. Implementing additional controls and system automation in its records request fulfillment process may assist NPRC in more timely responding to requests and help alleviate the growth of records requests backlogs in the future.

In addition, we found NPRC controls for processing medical emergency requests have not been effective in managing the significant increase in medical emergency requests. NPRC did not establish controls to evaluate the legitimacy of a medical emergency request and whether the request met NPRC's definition of medical emergency. As a result, some requesters may be taking advantage of the medical emergency request process to receive records quicker and are delaying NPRC's ability to process requests from veterans with true emergencies from obtaining their records in a timely manner.

Summary of Recommendations

Finding 1: NPRC Continues to Maintain a Veteran Records Request Backlog Despite Efforts to Resolve It

Number	Recommendation	Responsible Office
1	Develop a plan and timeline to eliminate the backlog.	Agency Services
2	Collaborate with the Office of Human Capital to improve current hiring processes at the National Personnel Records Center, develop workforce strategies to build the National Personnel Records Center workforce of the future, and enhance National Personnel Records Center employee retention strategies.	Agency Services

Finding 2: Opportunities Exist for NPRC to Improve its Records Request Fulfillment Processes Moving Forward

Number	Recommendation	Responsible Office
3	Assess the feasibility of implementing an automated system allowing veterans or their representatives to access their records online.	Agency Services
4	Implement controls to require digital delivery of responses on all requests where digital delivery is possible.	Agency Services
5	Update eVetRecs to: ensure the online request process requires requesters provide all information and documentation needed to ensure request can be filled during initial processing; implement controls to better ensure acceptable entries for requesters' name and provide automated address fields; and ensure eVetRecs has clear attestation language at key points in the record request process to better ensure the request is being made by the veteran or an authorized representative.	Agency Services
6	Update Archives.gov to communicate the status of the backlog to requesters and emphasize other potential sources.	Agency Services

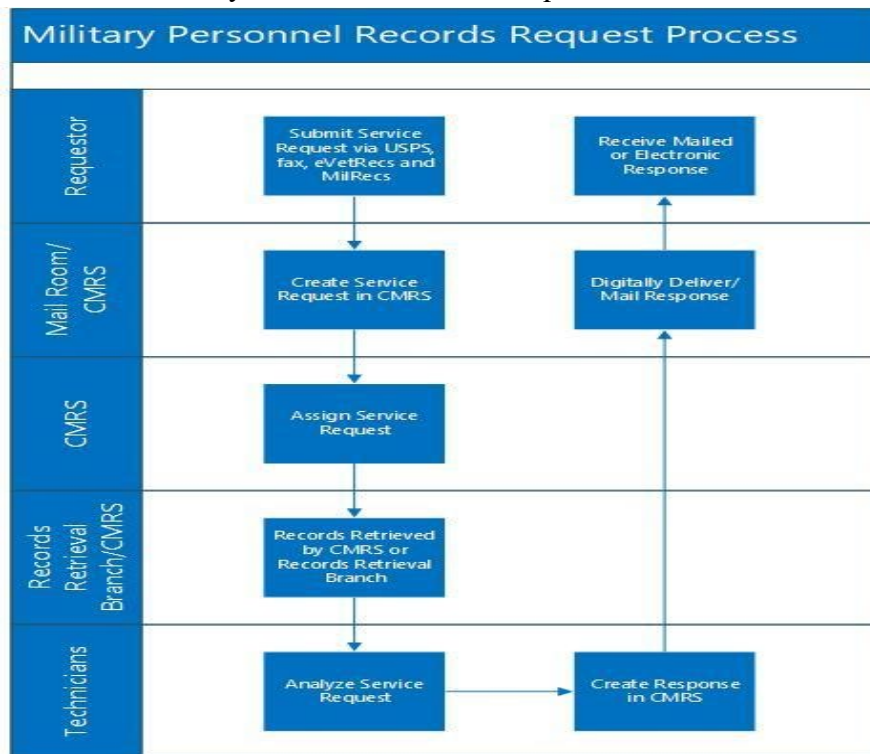
Finding 3: Additional Controls Needed to Manage the Increase of Medical Emergency Requests

Number	Recommendation	Responsible Office
7	Reconsider the National Personnel Records Center's definition of medical emergency, make any necessary changes to internal policy, communicate the definition to veterans and stakeholders, and implement procedures for how medical emergency requests are made and how they are validated.	Agency Services

Background

The National Personnel Records Center (NPRC) is the central repository of personnel-related records for both the military and civil services of the United States Government. NPRC is one of the National Archives and Records Administration’s (NARA) largest operations with over 700 employees serving its mission to provide world class service to government agencies, military veterans and their family members, former civilian Federal employees, and the general public. For an estimated 56 million veterans, NPRC stores more than 2 million cubic feet of military personnel and medical records in paper form. NPRC responds to requests from veterans and their families who require copies of their military service records. NPRC receives requests on the Standard Form (SF) 180, *Request Pertaining to Military Records*, through the mail or facsimile, electronically through eVetRecs (NARA’s online tool for requesting Veteran records), and by individuals visiting its research room. NPRC uses the Case Management and Reporting System (CMRS) to manage customer requests for military personnel, medical, and organizational records stored at NPRC. CMRS is used to manage staff workload, maintain data regarding each request, help locate the appropriate records, manage efficient retrieval of records, process copies of selected military records, produce any needed correspondence with the customer, and facilitate records shipment to the customer. NPRC’s records request process is shown in Chart 1 below.

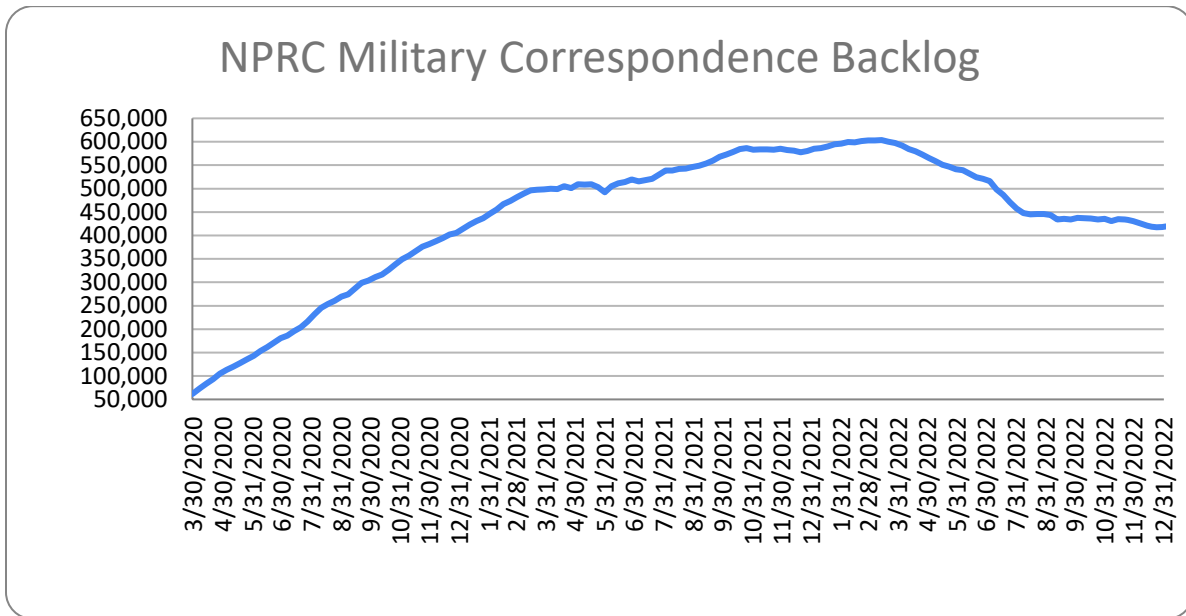
Chart 1: Military Personnel Records Request Process Flowchart



Source: Office of Inspector General (OIG)-created Chart from Interviews Conducted during Evaluation.

Prior to 2020, NPRC processed approximately 1.2 million requests annually, or approximately 23,000 requests each week, most of which staff completed within 10 working days. On March 23, 2020, NARA closed all facilities across the country to help limit the spread of Coronavirus Disease 2019 (COVID-19). This unprecedented move dramatically impacted operations as NPRC was closed, except for essential staff responding to high-priority requests.¹ On March 23, 2020, NPRC had 55,659 military records requests in its backlog,² which NPRC management stated was a standard, manageable backlog volume given a 10 working day turnaround on received requests. As the closures remained in place, this figure grew until it reached a backlog as high as 603,663 on March 14, 2022 (see Chart 2 below).

Chart 2: NPRC Military Correspondence Backlog Growth March 2020-December 2022



Source: NPRC Backlog Data

In October 2021, the Office of Inspector General (OIG) received a Congressional request to conduct a review of the factors contributing to the backlog at NPRC, NARA’s efforts to resolve it, and make any recommendations concerning how the backlog can be reduced more efficiently; how communications with veterans and their families about the backlog can be improved; how NARA can upgrade its IT infrastructure and further digitize necessary records to enable remote processing; how NARA can enhance its ability to acquire and award contracts to process the backlog; and what, if any, additional resources would be required to process outstanding records requests in a timely manner.

¹ NPRC defines requests as high priority when such records are necessary for burials, medical emergencies, and homeless veterans.

² For this review, the backlog total consists of all requests NPRC has received but have not yet completely processed.

Evaluation Results

Finding 1. NPRC Continues to Maintain a Veteran Records Request Backlog Despite Efforts to Resolve It

NPRC has maintained a backlog of unprocessed veteran records requests greater than its normal working level since March 2020. NPRC's backlog of unprocessed veteran records requests grew from 55,659 at the beginning of COVID-19 pandemic restrictions in March 2020 to as high as 603,663 on March 14, 2022. Factors contributing to the NPRC backlog include a lack of on-site staff due to facility occupancy restrictions in place from March 2020 to February 2022, and limited remote processing capabilities. NARA's 2022-2026 Strategic Plan states NARA strives to promote public access by providing consistent, reliable, and reputable service in response to customer requests. The Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* states management should identify, analyze, and respond to significant changes that could impact the internal control system. With assistance from the Department of Veterans Affairs (VA), funding from Congress, and easing of COVID-19 restrictions, NPRC was able to reduce the backlog by more than 37 percent from its highest point. Although NARA has put forth effort to reduce the backlog, more work needs to be done to ensure America's estimated 18.5 million living veterans are being serviced timely, and are receiving the records they need for service-related benefits and necessary medical treatment.

Facility Occupancy Restrictions

Historically, completion of a records request required manual, on-site work. Prior to pandemic restrictions, NPRC's workforce was over 600 employees. After facility occupancy restrictions went into place in March 2020, on-site staffing was significantly limited and reduced to less than 50. With this significant reduction, NPRC was unable to maintain the same level of records request processing as it did prior to the pandemic restrictions. With less than 50 staff on site to complete emergency requests at the beginning of the pandemic restrictions, the backlog increased immediately.

From March 23, 2020 through the removal of facility occupancy restrictions on February 28, 2022, NARA authorized various reopening levels at NPRC based on local public health conditions. During this period, NPRC on-site staffing ranged from 49 to 278 employees.³ To address the growing backlog while complying with COVID-related measures, NPRC increased on-site staff by implementing shift work,⁴ weekend and holiday work,⁵ and used space in another

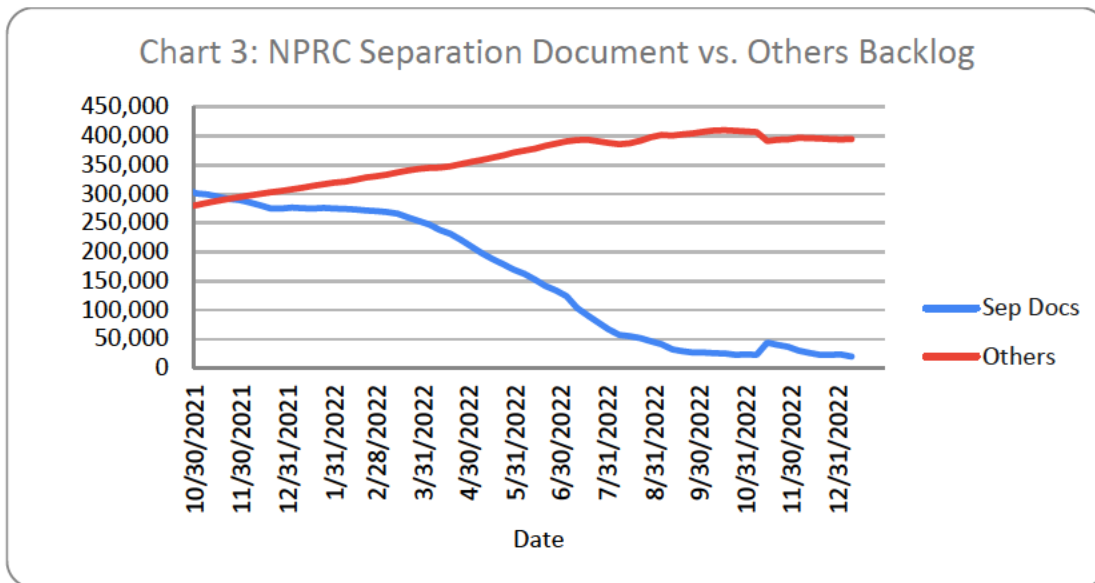
³ Employees came on-site on a volunteer basis once facilities began to be re-opened.

⁴ Beginning November 30, 2020, NPRC stood up a second shift. A third shift was implemented September 20, 2021.

⁵ Weekend and holiday work began in July 2020.

federal facility in St. Louis to fulfill records requests.⁶ Beginning in August 2021, NARA also coordinated with the Centers for Disease Control and Prevention (CDC) to assess the NPRC facility to determine the appropriate operating capacity. The CDC determined NPRC could safely operate at a higher level, therefore in October 2021, NARA increased NPRC’s facility occupancy limit from NARA’s approved facility occupancy limit (25 percent capacity) to the CDC’s recommended facility occupancy limit (45 percent). Although these efforts helped NPRC slow the growth of the backlog during the first two years of the COVID-19 pandemic, the efforts did not allow NPRC to significantly reduce the backlog. Since March 2022, NPRC has been able to go to pre-pandemic capacity to reduce the backlog.

NPRC’s backlog consists of two request types: (1) Separation Document requests (e.g. Department of Defense Form 214); and (2) Others requests (e.g. requests for clinical records). Emergency requests can fall under either Separation Documents or Others requests and have always been prioritized by NPRC. Since the start of facility occupancy restrictions in March 2020, NPRC continued to prioritize emergency requests. After those were processed, NPRC management prioritized processing Separation Document requests as those requests are normally needed to verify military service for benefits and can normally be fulfilled faster than Others requests. NPRC sought to reduce the Separation Document backlog by the end of Fiscal Year (FY) 2022 to a normal work in process level, which it accomplished (see chart 3 below).



Source: NPRC Backlog Data

⁶ On August 30, 2021, NPRC began servicing requests from this alternate worksite to allow greater number of staff to perform onsite work.

At the end of FY 2022, NPRC reported a Separation Document backlog of 26,609⁷ which NPRC management considers to be a manageable backlog level. As the Separation Document backlog reached manageable levels, NPRC began to shift focus to addressing the Others request backlog, which stands at 361,425 requests as of April 3, 2023. Others requests are more resource-intensive to fill⁸ and NPRC's pace of completion may slow once Others requests become the predominant type of request being worked.

In the eight weeks prior to April 3, 2023, on average NPRC reduced the Others request backlog by just over 3,200 requests per week. Projecting this average weekly reduction to the Others backlog forward to the end of FY 2023, at current staff levels and incoming request volumes, the OIG estimates NPRC would still have approximately 285,000 records requests in its Others request backlog, which is beyond a normal, manageable level. Without any additional interventions, NPRC would not clear the Others backlog until at least FY 2024. Any slowdown in the pace of any backlog reduction, would only extend the time needed to clear the Others request backlog. Additionally, NPRC maintains large volumes of records impacted by the 1973 fire. These fire-related records require significant effort by NPRC staff to fulfill records requests. As of April 3, 2023, fire-related records comprise 12,606 requests in the backlog. Processing more of these cases will also slow NPRC's overall pace of production.

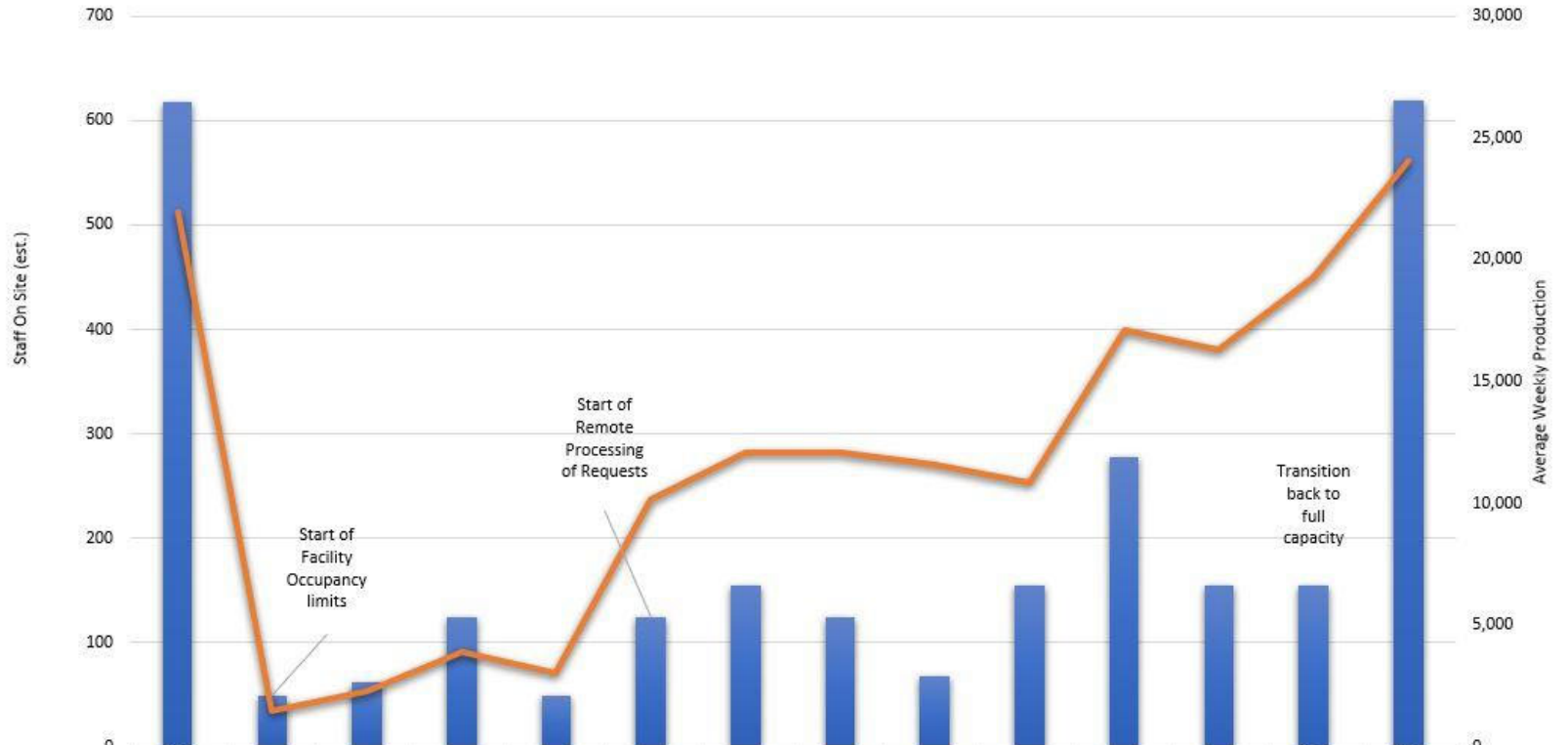
Chart 4⁹ below shows the various facility operating capacity limits from March 1, 2020 to September 30, 2022 and the average volume of records requests completed by NPRC staff in each phase of reopening.

⁷ NPRC will always report some quantity of separation documents in their backlog as they receive thousands of requests per day and have a 20-day turnaround time on requests.

⁸ Other requests are more complex and involve more than reproducing documents. These include requests for complete copies of personnel and non-emergency medical records, many of which require extensive review and redaction of third-party personal data before they may be released; the extraction of information to verify participation in specific campaigns or the award of specific medals; or the extensive research of organizational records, including morning reports and unit rosters.

⁹ Source: NPRC Backlog Data.

Changes to NPRC Operating Status and Production from March 1, 2020 to September 30, 2022



Facility Occupancy Limit	100 percent	8 percent	10 percent	20 percent	8 percent	20 percent	25 percent	20 percent	11 percent	25 percent	45 percent	25 percent	100 percent	100 percent
Duration	3 weeks	13 weeks	15 weeks	5 weeks	17 weeks	3 weeks	17 weeks	1 week	8 weeks	3 weeks	11.5 weeks	7.5 weeks	1 week	22 weeks
Dates	Mar 1, 2020 - Mar 22, 2020	Mar 23, 2020 - June 21, 2020	June 22, 2020 - Oct 4, 2020	Oct 5, 2020 - Nov 8, 2020	Nov 9, 2020 - Mar 7, 2021	Mar 8, 2021 - Mar 28, 2021	Mar 29, 2021 - July 25, 2021	July 26, 2021 - Aug 1, 2021	Aug 2, 2021 - Sept 26, 2021	Sept 27, 2021 - Oct 17, 2021	Oct 18, 2021 - Jan 4, 2022	Jan 5, 2022 - Feb 27, 2022	Feb 28, 2022 - Mar 6, 2022	Mar 7, 2022 - Sept 30, 2022
Staff On Site (est.)	618	49	62	124	49	124	155	124	68	155	278	155	155	619
Average Weekly Production	21,979	1,485	2,302	3,907	3,015	10,167	12,088	12,091	11,590	10,844	17,127	16,291	19,268	24,032

Limited Remote Processing Capabilities

When facility capacity restrictions went into place, NPRC was unprepared to transition its workforce to telework.¹⁰ Prior to March 2020, most NPRC staff were unable to telework due to the manual processes required to fulfill records requests. As most staff did not have laptops since electronic work was not available,¹¹ they could not immediately address the growing backlog virtually. NARA used FY 2020 Coronavirus Aid, Relief, and Economic Security Act funding to purchase and deploy laptops to NPRC staff. Thus, in early 2021, teleworking staff were able to begin processing requests remotely using NPRC's digital delivery functionality.¹² NPRC made considerable efforts to provide work to teleworking staff by identifying requests with responsive records already in digital form. Other work appropriate for telework, such as data entry of digitized mail, began to become available as well. By March 2022, NPRC staff working remotely could complete over 7,000 requests in one week.

Efforts to Address the Backlog

In addition to efforts to address the backlog noted above, NARA took other various actions to help address the backlog. NARA entered into an agreement with the VA to increase the number of VA staff on site and to coordinate the VA's digitization of NPRC records. NARA authorized additional staff resources for NPRC, for which NPRC management worked with the Office of Human Capital to conduct several hiring efforts. Further efforts included: NARA expanding the size of its contract labor force; deployment of laptops, scanning equipment, and softphones; multiple enhancement to eVetRecs; and initiated a project to modernize CMRS.

Department of Veterans Affairs Digitization Efforts

The VA's digitization efforts have helped NPRC in its efforts to resolve the backlog and to service requests quickly and electronically. As a stakeholder in providing veterans with requested records, the VA used part of its Congressional appropriation under the American Rescue Plan Act of 2021 for the digitization of NPRC holdings. The VA conducts its digitization efforts in three categories:¹³ (1) Digitization of records needed for VA claims; (2) Digitization of Records Requested by NPRC to help with the backlog; and (3) Pro-active digitization of records the VA expects will be requested for claims.

¹⁰ Without telework appropriate work available, the majority of NPRC staff was placed on weather and safety leave in March 2020.

¹¹ In rare instances prior to 2020, telework occurred such as supervisors teleworking to write performance reviews.

¹² A portal, allowing records and response documents in electronic form to be downloaded by the requester in lieu of postal service delivery.

¹³ The three categories are shown in order of VA priority.

As part of this on-going digitization effort, the VA provides millions of records (as a Portable Document Format (PDF) with an accompanying metadata¹⁴ file¹⁵ describing the documents provided) per year to NPRC via the Source Material Tracking System (SMTS). NPRC retrieves the VA-digitized records from SMTS and ingests them into CMRS where NPRC archives technicians can view and use the images when processing requests. When a request is made and the responsive record has been digitized, NPRC can service the entire records requests electronically, thereby eliminating the need to physically search for the responsive records and decreasing the time needed to fulfill the request. However, the digitization contractor sometimes provided inconsistent metadata, as certain fields useful to NPRC are unneeded by the VA for their claims processing. While not always receiving the metadata fields, NPRC backlog reduction efforts and service to veterans still benefit greatly from the VA's digitization efforts.

NPRC's Workforce Strategies

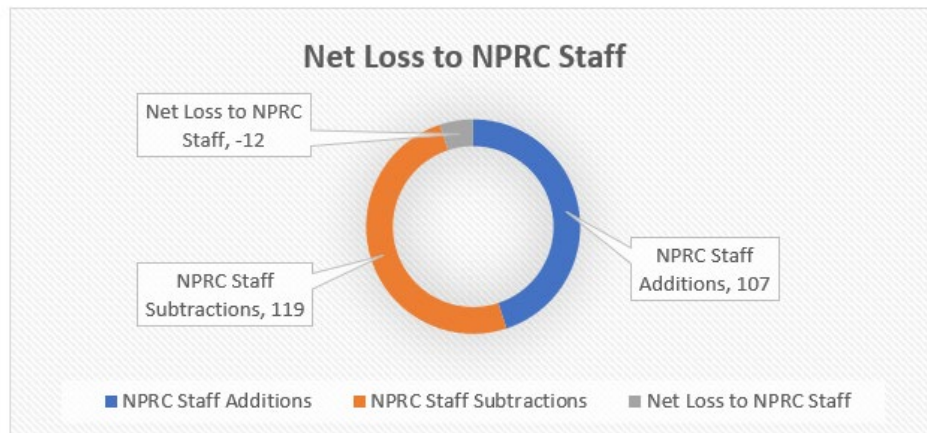
In addition to its existing workforce of over 600 employees, through its Resource Allocation Board, NARA has authorized 120 new staff members at NPRC since March 2020. NPRC has conducted three large hiring efforts in the last two years.¹⁶ Despite all three hiring efforts, 74 tentative vacancies remain at NPRC as of September 30, 2022.¹⁷ NARA's Chief Human Capital Officer stated obtaining qualified candidates was not an issue at NPRC, but retaining staff was a challenge. NPRC has historically experienced high staff turnover rates reportedly due to the physical, routine nature of the work, low wages, and lack of upward mobility. To overcome these challenges, NARA increased the frequency of job postings for the technician series, held virtual job fairs to promote opportunities to the public, expanded the recruiting authorities available to managers, and transitioned specific positions (with historically high turnover rates) to contract labor. While NPRC added 107 new staff members from March 2020 through May 2022, 119 staff members departed NPRC for a net loss of 12 staff members (see Chart 5 below).

¹⁴ NARA Bulletin 2015-04 defines metadata as elements of information that answer the questions 'who, what, where, when, and why' regarding electronic records. Metadata elements provide administrative, descriptive, and technical information that describe the structure and content of electronic records.

¹⁵ The VA's digitization contractor sends a separate metadata file with each veteran's scanned records that includes high level information about the files such as Name and Social Security Number.

¹⁶ The first hiring effort was initiated in February 2021 and onboarded 53 employees; the second hiring effort was initiated in September 2021 and onboarded 35 employees; and the third hiring effort was initiated in March 2022 and onboarded 44 employees as of September 30, 2022.

¹⁷ The vacancies are tentative due to 26 candidates selected for employment, but not yet onboarded.

Chart 5: Net Loss to NPRC Staff (March 2020-May 2022)¹⁸

Source: Office of Human Capital Data

For all three NPRC hiring efforts, no hiring action was completed within NARA's 80-day hiring timeline.¹⁹ In the first two hiring efforts, NARA significantly exceeded the required timeline from initiation to posting the job announcement²⁰ and from completion of interview to bringing staff onboard.²¹ The first timeline (initiation to posting the job announcement) saw improvement for the third hiring effort, but still did not occur within established timelines. The second timeline (completion of interview to bringing staff onboard) for the third hiring effort did not see improvement. While NARA prioritized hiring for offices with backlogs including NPRC, staff turnover in NARA's human resources shared service provider attributed to hiring delays. Staff hired during 2021 and early 2022 (before facility occupancy limits were lifted) would likely have spent time on weather and safety leave and not had significant impact on backlog reduction during times NPRC was under facility occupancy limits. However, these staff would have been available to process requests remotely, receive necessary training, and volunteer to work shifts on site. Also, they would have been better prepared to process requests and reduce the backlog when the restrictions were lifted than someone recently hired. Delayed hiring along with on-site work restrictions impacted NPRC's ability to have sufficient staff to process the backlog. Given its lengthy federal hiring process, the current workforce strategy for NPRC has done little to address the current backlog.

¹⁸ This chart reflects the net loss of NPRC Federal employees, but does not show the increase of contract staff over the same time frame.

¹⁹ 80 calendar days from manager requesting personnel action to employee entering on duty.

²⁰ Nine days maximum per timeline; NPRC's first two hiring efforts averaged 73 days for this action.

²¹ 29 days maximum per timeline; NPRC met the timeline only 15 percent of the time in its first two hiring efforts.

Use of Contract Labor

The contract labor force used for records retrieval at NPRC was increased from 30 staff to over 100. NPRC management believes the current size of its contract labor force meets their needs for records retrieval. However, the contract terms require the contract labor force to perform only physical searching and retrieval of records. NPRC does not have a contract in place to have contractors analyze and process records requests. NPRC requires additional resources assigned specifically to analyze and process records requests in order to address the backlog in a timely manner.

In addition to ongoing external support from the VA, to significantly address the current backlog, NARA would need an additional and significant surge of staffing dedicated to working on all aspects (document retrieval, reference, scanning, analysis, correspondence and associated labor, etc.) of the tasks required to fulfill requests. Without this effort NPRC will remain challenged to reduce the backlog and provide improved services to veterans and their families.

Recommendations

We recommend the Director of the National Personnel Records Center:

Recommendation 1: Develop a plan and timeline to eliminate the backlog.

Recommendation 2: Collaborate with the Office of Human Capital to improve the current hiring processes at the National Personnel Records Center, develop workforce strategies to build the National Personnel Records Center workforce of the future, and enhance National Personnel Records Center employee retention strategies.

Finding 2. Opportunities Exist for NPRC to Improve its Records Request Fulfillment Processes Moving Forward

Opportunities exist for NPRC to improve its records request fulfillment processes moving forward, including increased and improved system automation, and improved communication with veterans. NPRC has not implemented sufficient internal control over its records request process. *GAO Standards for Internal Control in the Federal Government* states management should design control activities to achieve objectives and respond to risks. Implementing additional controls and system automation in its records request fulfillment process may assist NPRC in more timely responding to requests and help alleviate the growth of records requests backlogs in the future.



Case Management and Reporting System

CMRS is used by the NPRC to support processing of requests for veterans, their families, and other members of the public. NPRC uses CMRS to manage customer requests for military personnel, medical, and organizational records stored at NPRC. CMRS is also used to manage staff workload, maintain data regarding each request, help locate the appropriate records, manage efficient retrieval of records, process copies of selected military records, produce any needed correspondence with the customer, and facilitate records shipment to the customer. Key features of CMRS include eVetRecs and Digital Delivery. eVetRecs is an online portal that allows members of the public to request records electronically. Digital Delivery is a module built into CMRS which allows the responses to requests to be delivered electronically to the requester through a dedicated online portal.

eVetRecs

In October 2020, NARA made several upgrades to eVetRecs including electronic status checks, electronic signatures, and a modernized interface. Using eVetRecs, a veteran can now submit their records request fully electronically. Previously, the veteran could complete an electronic records request but was required to mail or fax a copy of their handwritten signature. Now, a veteran can submit an electronic signature online via eVetRecs and the veteran must then wait for NPRC staff to process the request. The process at NPRC should take 20 days or less from receipt to completion, but may take longer based on the complexity of the request and any pending backlog at NPRC. If the response is mailed, additional time elapses before the veteran receives their request. Until NPRC's October 2020 upgrade of eVetRecs, a veteran would not be able to track the status of their request online once submitted. As a result of the 2020 upgrade to eVetRecs, the number of requests received by NPRC through eVetRecs greatly increased. NPRC estimates approximately 75 percent of all requests were received electronically as of April 2022. Requests received electronically are entered into NPRC's workflow quicker than requests received by mail, allowing the veteran to receive records faster.

However, there are still several areas where NPRC could improve upon the eVetRecs submission process:

- Required Information for Requests. NPRC management stated their goal is to make it as simple as possible for veterans, their families, and representatives to request records. To make the request process straightforward, NPRC requires only the veteran's First and Last Name from requesters to start a request. However, NPRC often needs more information than this to process requests through eVetRecs.. For example, NPRC might receive a request for records of a veteran with a common name, of which NPRC likely has hundreds of veterans with the same name in their holdings. Without any further information (e.g. date of birth), NPRC cannot fulfill the request with the minimum level of information provided by the requester. NPRC staff respond to the requester via mail to get the additional information they need to process the request. In addition, the requester needs to respond in writing to NPRC with the additional information, which results in significant delays in completing the fulfillment action. Another example is an emergency burial where some information is provided, but information necessary for NPRC to process the burial request is not (e.g. obituary, proof of death). NPRC employees will inefficiently use time by searching for necessary information about a request not provided by the requester instead of using their time processing requests containing sufficient information.
- Data Entry Controls. NPRC does not have sufficient controls to limit misrepresentation of requesters making requests through eVetRecs. 

- Automated Addresses. Requesters must manually enter their mailing addresses on eVetRecs. Potential exists for NPRC to automate the address field to limit the potential for errors.
- Enhanced Attestation on Submissions. Requesters do not have to complete an attestation when verifying their personal information at the beginning of the online request form. The only attestation through eVetRecs comes at the end of the request form just before submission of the request, which is several pages after the requester's personal information is entered. NPRC staff identified concerns with external parties submitting a request for a record and entering the request to make it seem as though the requester was the veteran for whom the records were requested. NPRC staff thought requesters might claim they were unaware they had posed as the veteran for whom the request was made based on

where the attestation was made in the process. A clear attestation requirement at critical parts of the online request submission form may help NPRC deter misrepresentation from requesters.

Digital Delivery

NPRC's records request process is highly manual and paper-based. To help address this issue, NPRC rolled out its digital delivery functionality pilot in December 2019. The pilot allowed NPRC to shorten request response times by providing the requested records via a secure online website instead of by regular mail. NPRC archives technicians can choose to use its digital delivery portal to provide records requests if the requester provides a valid email address. NPRC staff can digitally deliver records already in digital form or can scan paper records and provide them through the digital delivery portal.

During FY 2022, NPRC provided responses via digital delivery for 447,859 requests, or approximately 41 percent of all requests fulfilled during the year. Of the requests responded to using digital delivery, NPRC's estimates approximately 43 percent were completed without a physical search²² and 57 percent were completed with a physical search. However, the original design of the digital delivery portal could not handle the volume of requests being fulfilled electronically when NPRC stood up remote processing capability. Completed requests would stall in the digital delivery process,²³ slowing down completion of the request and requiring NPRC staff to work overtime to manually direct the system to process responses. NARA was able to implement a technical fix, which helped with the issue in May 2022, but the system is still regularly experiencing daily delays in the digital delivery process. A solution was funded in FY 2022 and was deployed in two phases: Phase 1 included the upgrade and migration of servers (completed October 2022), and Phase 2 includes the addition of two additional servers (completed December 2022).

CMRS Modernization

As previously mentioned, CMRS supports NPRC in providing military veterans, their families, and Federal agencies the ability to request access to personnel service records and medical case files. However, CMRS is a legacy system with complicated, highly customized code requiring significant time and money to upgrade. In 2021, members of Congress urged NARA to submit a request to the Technology Modernization Board for Technology Modernization Funds (TMF) for a new system. After submitting a request, NARA received approval in April 2022 from the Board for \$9.1 million under the TMF to upgrade both its Archives and Records Centers Information System and CMRS.

²² Requests in which a digital copy was available, there was no record identified, or no record was needed to process the request (e.g. informational responses).

²³ Requests would stall because the larger files limited how quickly the requests were processed.

NARA's plan to implement a modern customer relationship management platform may bring a more user-centered design approach to addressing obstacles to users' needs and enhancing the customer's experience. NARA awarded the contract for the modernized CMRS on August 22, 2022.²⁴ According to NARA's briefing to the Technology Modernization Board, a modernized CMRS will significantly improve Government services to veterans and their families by:

- Expediting NPRC responses to inquiries directly from veterans and accelerate NARA responses to other agencies who use records in our custody for their veteran services.
- Providing veterans and their families with end-to-end, fully digital services that allow them to order and receive records electronically, through the web, using intuitive interfaces and secure channels.
- Allowing NARA to accept electronic identity proofing and authentication from veterans and their families.

While improvements with eVetRecs, digital delivery, and a modernized CMRS are all steps in the right direction, additional opportunities may exist for NPRC to make digital records available to veterans on demand, thereby helping veterans obtain the records they need for service-related benefits faster. For example, NPRC could develop an automated Customer Relationship Management system to provide most veterans access to their own military personnel records through a secure, self-service website. For example, the veteran could be able to login to the NPRC website using their own unique account information and retrieve all of their military personnel records NPRC maintains and has had scanned and processed for release. While requiring increased effort, implementing a self-service method will positively assist veterans in obtaining their needed records faster. Applying this methodology, most veterans would not have to submit a request to NPRC for their records, thus decreasing the amount of time and stress on the veteran as to whether or not they will receive records in a timely manner. This could also significantly reduce the workload at the NPRC as more records get scanned, processed, and loaded into a self-service system.

Communication of Backlog to Veterans

NPRC did not always maintain open communication with veterans about its backlog or clearly direct veterans to other potential sources of their records. NPRC posted information concerning NPRC's facility operating status and records request backlog on [archives.gov](https://www.archives.gov) starting March 23, 2020, but decided to remove information concerning the backlog after resuming its normal operating status on February 28, 2022. NARA's 2018-2022 and 2022-2026 Strategic Plans state "Connect with Customers challenges us to continuously improve customer service, cultivate public participation, and generate new understanding of the importance of records in a democracy." By not continuing to be fully transparent with veterans on their website about the

²⁴ NARA's project plan estimates the new system will be completed October 2023.

status of the backlog and emphasizing other potential sources of records, NPRC runs the risk of increasing the number of repeat requests and not meeting veteran expectations or needs.

Recommendations

We recommend the Director of the National Personnel Records Center:

Recommendation 3: Assess the feasibility of implementing an automated system allowing veterans or their representatives to access their records online.

Recommendation 4: Implement controls to require digital delivery of responses on all requests where digital delivery is possible.

Recommendation 5: Update eVetRecs to: ensure the online request process requires requesters provide all information and documentation needed to ensure the request can be filled during initial processing; implement controls to better ensure acceptable entries for requesters' name and provide automated address fields; and ensure eVetRecs has clear attestation language at key points in the record request process to better ensure the request is being made by the veteran or an authorized representative.

Recommendation 6: Update Archives.gov to communicate the status of the backlog to veterans and emphasize other potential sources.

Finding 3. Additional Controls Needed to Manage the Increase of Medical Emergency Requests

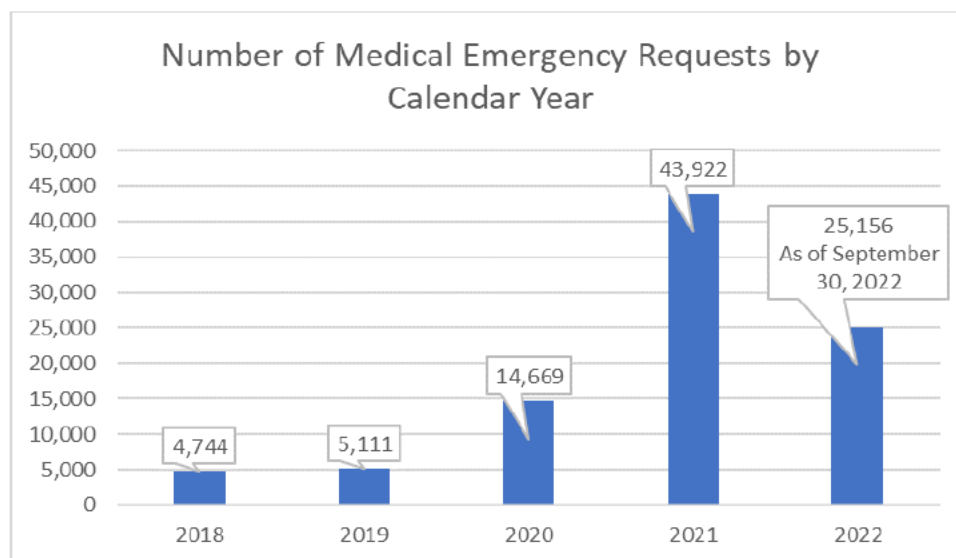
NPRC controls for processing medical emergency requests have not been effective in managing the significant increase in medical emergency requests. NPRC did not establish controls to evaluate the legitimacy of a medical emergency request and whether the request met NPRC's definition of medical emergency. Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* states management should identify, analyze, and respond to significant changes that could impact the internal control system. As a result, some requesters may be taking advantage of the medical emergency request process to receive records quicker and delaying NPRC's ability to process other requests. Also, resources and time needed for NPRC to process urgent cases could be delayed addressing medical emergency requests not meeting NPRC's definition of a medical emergency.

NPRC has defined a medical emergency as "a situation of life-threatening nature in which military personnel and/or medical records are needed for immediate emergency medical treatment." The Emergency Medical Treatment & Active Labor Act (EMTALA) ensures public access to emergency services regardless of ability to pay. While the VA is exempt from EMTALA, their practice of emergency medicine includes evaluation and emergency care that is compliant with EMTALA. Therefore, any veteran seeking immediate emergency medical treatment is required to be provided those services without any regard to their veteran status. Any need for records (e.g. Separation Document) proving veteran status for benefits can be obtained after the life-threatening, immediate emergency medical treatment has been provided.

Under its definition of medical emergency, NPRC would expect to receive very few medical emergency requests per year. NPRC's policy states "in most cases, the requester will be requesting clinical records." However, historical analysis by NPRC reported 95 percent of all medical emergency requests were for records not beneficial to any type of emergency medical treatment.

Prior to 2020, NPRC received several thousand medical emergency requests per year although NPRC reported many such requests did not meet NPRC's definition of "medical emergency" or policy. In 2020, the issue became even further exacerbated as medical emergency requests nearly tripled from the prior year. In 2021, NPRC received eight times as many medical emergency requests as it had just two years prior. From January 1 through September 30, 2022, NPRC continued to receive substantially higher amounts of medical emergency requests than they had before 2020 (see Chart 6 below).

Chart 6: Number of Medical Emergency Requests by Calendar Year



Source: NPRC-Provided Data

While the COVID-19 pandemic might be expected to cause an increase in medical emergencies, other factors are involved in this surge of medical emergency requests. First, eVetRecs was updated in 2021 to accept medical emergency requests, which NPRC staff believed caused medical emergency requests to increase. NPRC did not implement sufficient control over the request process on eVetRecs. When making requests, eVetRecs routes the requester to different pages for medical emergency requests and non-emergency requests for medical records. For non-emergency requests for medical records, additional fields are required for NPRC to fulfill the request. When requesters make a medical emergency request on eVetRecs, the user is unnecessarily routed to a page to request only Separation Documents, even though, according to NPRC, Separation Documents are not needed for emergency medical treatment.

NPRC acknowledged the medical emergency request process has historically been subject to abuse. As NPRC prioritizes emergency requests above other pending requests, they believe some requesters, mainly private companies identified their requests as medical emergencies to have the requests processed quicker (NPRC analysis reported approximately 57 percent of all medical emergency requests in 2022 came from these private companies). Efforts by those who circumvent the records request process only exacerbate the records backlog and may prevent veterans with true emergencies from obtaining their records in a timely manner. Additionally, these third-party requestors often charge the veteran a fee to obtain copies of their records which they otherwise would obtain at no charge from NPRC.

NPRC has been working to implement a plan to address the issue of medical emergency request abuse. The plan entails communicating the definition of medical emergency to the public, updating their procedures, and requiring medical emergency requests be made only by medical facilities through NPRC's call center and not via eVetRecs. The plan also entails sending a letter

to third-party requesters to communicate the changes in NPRC policy for medical emergency requests.

Recommendation

We recommend the Director of the National Personnel Records Center:

Recommendation 7: Reconsider the National Personnel Records Center's definition of medical emergency, make any necessary changes to policy, communicate the definition to veterans and stakeholders, and implement procedures for how medical emergency requests are made and how they are validated.

Appendix A – Objective, Scope, and Methodology

Objective

Our objective was to evaluate the backlog of records requests at the NPRC and make recommendations to help efficiently reduce the backlog and improve the process moving forward.

Scope and Methodology

To accomplish our objective, we performed evaluation procedures from the auditors' approved COVID-19 public health emergency telework location, Archives II in College Park, Maryland, and NPRC in St. Louis, Missouri. Specifically, we performed the following:

- Reviewed laws and regulations; NARA policies and procedures; NARA Strategic Plans; and NPRC organizational charts.
- Obtained testimonial evidence from applicable NARA officials.
- Evaluated the NPRC backlog by analyzing data supporting NPRC backlog of records requests from March 2020 to January 2023 and evaluated the types of requests comprising the backlog.
- Reviewed efforts undertaken by NARA to address the backlog.
- Reviewed process in place for records requests at NPRC to include physical and IT processes to identify areas NPRC could improve to reduce the backlog more efficiently.
- Reviewed NPRC communications with the public and stakeholders concerning the backlog and the records request process.
- Reviewed Information Technology (IT) infrastructure for vetrecs.archives.gov (eVetRecs), CMRS, and reviewed digitization efforts at NPRC to include internal digitization efforts, an agreement with the VA to digitize NPRC records, NPRC oversight of VA digitization, and the impact digitization has on the backlog.
- Reviewed contracts in place at NPRC to address the backlog.
- Reviewed other potential resource needs such as increased staffing, contract labor force, and assistance from other agencies at NPRC to help alleviate the backlog.

We conducted this evaluation from March 2022 through April 2023 in accordance with *Council of the Inspectors General on Integrity and Efficiency (CIGIE) Quality Standards for Inspection and Evaluation*. Those standards require that we plan and perform the evaluation to collect and analyze evidence consistent with our objective, sufficient and appropriate to support our findings, and provide a reasonable basis for our conclusions. We believe the evidence obtained provide a reasonable basis for our findings and conclusions based on our evaluation objectives.

Appendix B – Acronyms

CDC	Centers for Disease Control and Prevention
CMRS	Case Management and Reporting System
COR	Committee on Oversight and Reform
COVID-19	Coronavirus Disease 2019
DoD	Department of Defense
EMTALA	Emergency Medical Treatment & Active Labor Act
FY	Fiscal Year
GAO	Government Accountability Office
IT	Information Technology
NARA	National Archives and Records Administration
NPRC	National Personnel Records Center
OIG	Office of Inspector General
OMB	Office of Management and Budget
PDF	Portable Document Format
SF	Standard Form
SMTS	Source Material Tracking System
TMF	Technology Modernization Fund
VA	Department of Veterans Affairs

Appendix C – Agency Comments

Agency management reviewed a discussion draft and provided no comments to this report. Agency management stated their general agreement with the findings and recommendations and opted not to provide formal comments for inclusion in this report.

Appendix D – Report Distribution List

Acting Archivist of the United States
Chief Operating Officer
Deputy Chief Operating Officer
Chief of Management and Administration
Chief Human Capital Officer
Chief Information Officer
Executive for Agency Services
Director, National Personnel Records Center
Agency Services Chief of Staff
Accountability
Senate Homeland Affairs and Governmental Affairs Committee
United States House Committee on Oversight and Reform

OIG Hotline

The OIG Hotline provides a confidential channel for reporting fraud, waste, abuse, and mismanagement to the OIG. In addition to receiving telephone calls at a toll-free Hotline number and letters to the Hotline post office box, we also accept emails through an online referral form. Walk-ins are always welcome. Visit www.archives.gov/oig/ for more information, or contact us:

By telephone

Washington, DC, Metro area: 301- 837-3500

Toll-free: 800-786-2551

By mail

NARA OIG Hotline

P.O. Box 1821

Hyattsville, MD 20788-0821

By facsimile

301-837-3197

By online referral form

www.archives.gov/oig/referral-form/index.html

Contractor Self-Reporting Hotline

As required by the Federal Acquisition Regulation, a web-based form allows NARA contractors to notify the OIG, in writing, whenever the contractor has credible evidence a principal, employee, agent, or subcontractor of the contractor has committed a violation of the civil False Claims Act or a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations in connection with the award, performance, or closeout of a contract or any related subcontract. The form can be accessed through the OIG's home page or found directly at www.archives.gov/oig/contractor-form/index.html.