

December 1, 2023

TO: Dr. Colleen Shogan Archivist of the United States

FROM:

Dr. Brett M. Baker Inspector General

SUBJECT: Management Letter: Control Deficiency Identified During the Audit of National Archives and Records Administration's Financial Statements for Fiscal Year 2023

The Office of Inspector General (OIG) contracted with CliftonLarsonAllen, LLP (CLA) to conduct an independent audit the financial statements of the National Archives and Records Administration (NARA) as of and for the fiscal years ended September 30, 2023 and 2022. CLA issued an unmodified opinion on the financial statements of NARA as of and for the fiscal years ended September 30, 2023 and 2022 (OIG Audit Report No. 24-AUD-02).

During the audit, CLA identified one internal control deficiency that did not rise to the level of a material weakness or significant deficiency but represents an opportunity to strengthen internal control and operating efficiency. The control deficiency, summarized in Appendix A, has been discussed with the appropriate members of your management team. We consider the recommendation open. Please submit an action plan for the recommendation within 30 days. Once your office has fully implemented the recommendation, please submit evidence of completion, or agreed upon corrective action so that the recommendation may be closed. The report should be read in conjunction with NARA's financial statements and notes to fully understand the context of the information contained therein.

The Management Letter is intended solely for the information and use of NARA management, those charged with governance, and the Office of Inspector General and is not intended to be, and should not be, used by anyone other than these specified parties. As with all OIG products, we determine what information is publicly posted on our website from the attached report. Consistent with our responsibility under the Inspector General Act, as amended, we will provide copies of our report to congressional committees with oversight responsibility over NARA.

We appreciate the cooperation and assistance NARA extended to CLA and my staff during the audit. Please contact me with any questions.

cc: Debra Steidel Wall, Deputy Archivist of the United States
 Tasha Ford, Executive Secretariat
 Gary M. Stern, General Counsel
 Micah Cheatham, Chief of Management and Administration
 William Bosanko, Chief Operating Officer
 Meghan Guthorn, Deputy Chief Operating Officer
 Colleen Murphy, Chief Financial Officer and Senior Accountable Official
 Kimm Richards, Accountability
 Carol Seubert, Senior Financial Auditor
 United States Senate Homeland Security and Governmental Affairs Committee
 United States House of Representatives Committee on Oversight and Reform



## FISCAL YEAR 2023 MANAGEMENT LETTER

To the Inspector General National Archives and Records Administration

To the Archivist National Archives and Records Administration

In planning and performing our audit of the consolidated financial statements of the National Archives and Records Administration (NARA) as of and for the year ended September 30, 2023, in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial statement audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and Office of Management and Budget (OMB) Bulletin No. 24-01, *Audit Requirements for Federal Financial Statements* (OMB Bulletin 24-01), we considered NARA's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of NARA's internal control. Accordingly, we do not express an opinion on the effectiveness of NARA's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. In addition, because of inherent limitations in internal control, including the possibility of management override of controls, misstatements due to fraud or error may occur and not be detected by such controls.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our Independent Auditors' Report dated November 13, 2023, described one significant deficiency. During our audit, we also became aware of deficiencies in internal control other than significant deficiencies and material weaknesses and other matters that represent opportunities for strengthening internal control and operating efficiency. While the nature and magnitude of these other deficiencies in internal control were not considered important enough to merit the attention of those charged with governance, they are considered of sufficient importance to merit management's attention. Our comments and recommendations regarding those matters are summarized in Appendix A. This communication does not affect our Independent Auditors' Report, dated November 13, 2023, which contains our written communication of one significant deficiency that came to our attention in performing our audit.

We have discussed these comments and recommendations with various NARA personnel, and we will be pleased to discuss them in further detail at your convenience.

Appendix B presents the current year status of the prior year management letter comments. This communication is intended solely for the information and the use of NARA management and NARA Office of Inspector General and is not intended to be, and should not be, used by anyone other than these specified parties.

CliftonLarsonAllen LLP

Clifton Larson Allen LLP

Greenbelt, Maryland November 13, 2023

#### Appendix A National Archives and Records Administration Fiscal Year 2023 Financial Statement Audit

## Management Letter Comments

## 1. Entity Wide Travel Policy was not Updated Timely (Repeat Finding)

NARA's 601 Travel Policy and Procedures listed on NARA's intranet and provided to the auditors was not current. The policy was last updated in March 2008 and does not reference current procedures.

CLA issued a repeat prior year finding, as the condition mentioned above still exists as of September 30, 2023.

#### Recommendation 1:

Recommend the Chief Financial Officer update the travel policy and continue efforts to ensure that all written policies and procedures are reviewed and revised timely.

#### Management Response:

Management concurred with the finding and recommendation without additional comment.

# Appendix B National Archives and Records Administration FY 2023 Financial Statement Audit Status of Prior Year Recommendations

| Prior Year Recommendations   | Fiscal Year 2023 Status         |
|--|---------------------------------|
| The Chief Financial Officer update the travel policy to<br>ensure that all written policies and procedures are<br>reviewed and revised timely (modified repeat<br>recommendation)  | Open. Repeat finding in FY 2023 |
| The Chief Financial Officer update Interim Guidance<br>400-8, <i>Quarterly Reconciliation of Open Items for all</i><br><i>NARA Funds</i> , to include a review of open obligations<br>for completeness. There should be steps for<br>contracting officer representatives and program office<br>management to take if they detect an obligation is not<br>complete, including how to bring any errors to the<br>attention of the Office of the Chief Financial Officer.<br>(modified repeat recommendation) | Closed                          |