



NATIONAL
ARCHIVES

OFFICE of
INSPECTOR GENERAL

Date : December 4, 2012

Reply to : Office of Inspector General (OIG)

Subject : Management Letter 13-04, Vulnerabilities in Managing the Student Workforce at the
National Personnel Records Center

To : David S. Ferriero, Archivist of the United States (N)

While investigating unrelated allegations, the National Archives and Records Administration (NARA) Office of Inspector General (OIG) identified at least one student employee at the National Personnel Records Center (AFN) who may not have been properly enrolled in a college, university, or other approved course of study during a portion of their employment with NARA. Furthermore, various unofficial documentation is being used to initially verify students' required enrollment status at AFN, and no reviews are being done to ensure students' enrollment status does not change throughout the semester. This appears to be happening because there are no official standards for the allowable enrollment documentation, and no requirements for students to either certify they are maintaining their enrollment status, or show they maintained their status throughout the class period. These conditions show vulnerabilities in how NARA is managing the student workforce at AFN, which should be considered as NARA transitions into the new government-wide Pathways Programs.

Student Employment Programs

Under Executive Order 13562, the Student Temporary Employment Program (STEP) and Student Career Experience Program (SCEP) are in the process of converting to the Pathways Programs. Like STEP and SCEP, the Pathways Programs are designed to provide students enrolled in a wide variety of educational institutions, from high school to graduate level, with opportunities to work in agencies and explore Federal careers while still in school and while getting paid for the work performed. OPM regulations governing the Pathways Programs have become effective, but NARA has until January 6, 2013 to transition to the Pathways Programs. Both STEP and the corresponding Pathways Program, the Pathways Internship Program, require students to be enrolled, or accepted for enrollment, in a qualified educational institution on at least a half-time basis.

NARA Directive 311, *Employment of Students*, dated October 10, 2006 (NARA 311), currently controls the STEP program at NARA, but is in the process of being updated for the Pathways Programs. This provides an excellent opportunity to review how NARA 311 has been

implemented, and identify potential areas of improvement. As mandated by OPM, NARA 311 requires STEP employees be enrolled on a half-time basis, as defined by the school in which the student is enrolled. Further, paragraph 311.15 states administrative officers or supervisors must verify student enrollment at the beginning of the semester or quarter, and allows the verification to be "in the form of a letter from the school or other documentation." Paragraph 311.21 also makes it clear employees who no longer meet the definition of student must be terminated.

However, there is a lack of clear guidance as to exactly what constitutes sufficient documentary evidence the student is enrolled in courses at the beginning of the semester. There are also no policies requiring the student to certify they will maintain their enrollment status, notify NARA immediately of any changes, or verify they maintained their eligibility for the STEP program throughout the semester. The latter could be done by submitting documentation at the end of the semester, preferably in the form of official transcripts.

Limited Review of Implementing the Current NARA 311

While conducting an investigation, we reviewed several students' files at AFN. We noted a lack of thoroughness and consistency in documenting 1) enrollment within academic courses and 2) verification academic courses were actually completed as planned and agreed by the employee. One student appears to not have attended college for several semesters during the course of their employment with NARA. There was also a lack of consistency with respect to the types of documentation contained within the employee files to prove student enrollment. Examples of proof submitted by employees include letters and emails from class advisors indicating the employee was enrolled at the college or university, printouts from online registration systems, unofficial transcripts, bills from the colleges or universities, and screenshots apparently generated from the employees' online college account. No official transcripts were used to document either employee enrollment in, or employee completion of, coursework.

Management officials involved with the current version of NARA 311 were asked about the potential for fraud wherein an employee enrolls in a program, provides proof of enrollment to the supervisor, then withdraws from the courses to avoid tuition costs. NARA management agreed this is a possibility, and stated they have heard rumors of employees engaging in this conduct at other agencies. Further, NARA management stated NARA lacks consistency in verifying enrollment, as some supervisors are more thorough than others in verifying if employees are actively enrolled in an approved program.

Redrafting NARA Guidance for Transition to the Pathways Programs

Efforts are currently underway to redraft NARA policy and guidance to reflect the transition to the Pathways Programs, providing an excellent opportunity to include processes to improve NARA's internal controls and better protect NARA from waste, fraud, and abuse. However, NARA management has stated the redraft of NARA 311 currently does not address any of the issues identified above.

We encourage you to consider the following while redrafting NARA 311:

- Provide more detailed guidance on what type of documentation is acceptable to verify a student's enrollment status at the beginning of a semester. While there is no mandate to use official transcripts in the implementing OPM regulations, encouraging the use of official transcripts would provide an added layer of protection against potential fraud.
- Require students to sign a form certifying they will maintain their enrollment status, and notify NARA immediately if they drop to less than half-time as defined by their educational institution. The Office of General Counsel (NGC) should review any form for sufficient legal warnings so students know providing false or misleading information or certification regarding enrollment may be punishable under applicable law.
- Require returning students produce documentation, such as official transcripts, demonstrating they were properly enrolled in a course of study during the previous semester. This provides proof the student fulfilled their commitment, and would provide a substantial deterrent to fraud.

Please provide a written response to these matters within 30 days of the date of this letter. If you have any questions or require additional information, please contact me or John Simms, my counsel, at 301-837-1966. As with all OIG products, we will determine what information is publicly posted on our website from this management letter. Should you or management have any redaction suggestions based on FOIA exemptions, please submit them to my counsel within one week from the date of this letter. Should we receive no response within this time frame, we will interpret that as confirmation NARA does not desire any redactions to the posted report.



James Springs
Acting Inspector General