

OFFICE *of* INSPECTOR GENERAL

SEMIANNUAL REPORT

to CONGRESS

APRIL 1, 2014 *to* SEPTEMBER 30, 2014



FOREWORD

During this period the Inspector General, Mr. Paul Brachfeld, retired after nearly 35 years of public service in the Federal Government. For the last 14 years Mr. Brachfeld served in the National Archives and Records Administration (NARA) Office of Inspector General (OIG) as the Inspector General. During this time Mr. Brachfeld oversaw and guided the growth and development of the NARA OIG from a very small office into a top-notch oversight entity. Mr. Brachfeld was also highly engaged with the Inspectors General community, and was pivotal in helping shape the community into what it has become today.

At the NARA OIG, Mr. Brachfeld's leadership translated into dynamic audits and major investigations. During his tenure the OIG exposed material weaknesses, made significant recommendations to improve NARA programs and operations, and investigated fraud, waste, and abuse leading to the convictions of many individuals determined to abuse NARA. The agency became a more effective and efficient organization through his efforts. For those of us who continue, the bar has been set high, and we will strive to meet and exceed it.

The work, however, continues. In the last three Semiannual Reports we have repeatedly stressed the importance of internal controls. They are essential for improving efficiency and program effectiveness. Unfortunately, NARA continues to be challenged in this area on a systemic, agency-wide basis. As we have said before, NARA has an incredibly talented and dedicated staff, but without an effective internal control program, NARA staff members do not have all of the tools they need to make positive changes for the agency. NARA remains at the beginning of what needs to be a prolonged and intensive effort to build an internal control program. Senior leadership reports that they agree, but they need to make sure their acceptance of this fact spreads through the entire agency and the staff is provided the necessary resources.

One part of this effort must be a more determined commitment to address NARA OIG-identified issues in a timely manner. Too many audit recommendations remain open. These delays can undermine this office's potential to improve the agency. Accordingly, NARA must identify and address the cause of these delays. We look forward to resolving these issues and continuing to independently provide the services necessary to help NARA improve. Our goal is to assist NARA in becoming a better agency.

Once again, I am proud of the work we have accomplished this semiannual reporting period, and of the hardworking employees of the OIG. We do not do this alone, and I thank those individuals who have given us the support we need. As always, we have an ambitious agenda ahead of us in the coming months, and I look forward to presenting the results of those efforts in the future.



James Springs
Acting Inspector General

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Visit <http://www.archives.gov/oig/> to learn more about the National Archives Office of Inspector General.

EXECUTIVE SUMMARY

This is the 52nd Semiannual Report to Congress summarizing the activities and accomplishments of the National Archives and Records Administration (NARA) Office of Inspector General (OIG). A summary of NARA's top ten management challenges is included as well. The highlights of our major functions are summarized below.

Audits and Reports

The Audit Division continued to examine NARA's Information Technology (IT) systems, including the Electronic Records Archives (ERA) system, and assess the economy and efficiency of NARA's programs and operations. During the reporting period, we issued the following audit reports and management letters.

Information Technology (IT)

- **Effectiveness of NARA's Enterprise Wireless Access.** NARA is not effectively managing its wireless environment to ensure appropriate security controls are identified, documented, and periodically tested. Identified security weaknesses, if exploited, could adversely impact the confidentiality, integrity, and availability of NARA's data and information systems. These weaknesses could ultimately negatively impact NARA's ability to protect its information or information systems. (OIG Audit Report #14-10, dated May 15, 2014. See page 11.)
- **Electronic Records Archives (ERA) Executive Office of the President (EOP) Data Migration Project.** NARA's internal archival management system for handling electronic records under the Presidential Records Act was recently upgraded. However, the search capabilities of the upgraded system did not function correctly due to the way the data was indexed. As a result, data migration to the upgraded system will take longer than planned, and NARA has funded more than \$350,000 for additional testing, operations, and maintenance costs. (OIG Audit Advisory Report #14-14, dated May 28, 2014. See page 11.)
- **NARA's Capital Planning and Investment Control (CPIC) Process.** NARA was not following its formal, documented CPIC policy. In addition, several projects did not complete the elements required by NARA's CPIC process. This compromises the agency's ability to optimize its limited IT resources as well as minimize risks and maximize returns. (Audit Report #14-08, dated April 17, 2014. See page 12.)

Programs and Operations

- **Selected Aspects of NARA's Digitization Program.** NARA had not revised or fully implemented its strategy to digitize traditional (i.e., paper) record holdings. Further, NARA did not transparently reflect the number of records the agency made available to the public despite the fact NARA has consistently identified "access" as a key agency initiative. (OIG Audit Report #14-12, dated July 3, 2014. See page 12.)

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- **Special Telework Arrangements.** NARA’s telework program lacks effective oversight and has weak internal controls. We identified several areas where improvement is needed to ensure special telework arrangements are administered in accordance with policy and procedures, and are in NARA’s best interest. (OIG Audit Report #14-11, dated May 5, 2014. See page 13.)
- **Conference Related Activities and Expenses.** NARA could have realized \$193,942 in funds to better use had stronger internal controls over conference-related activities and expenses been implemented. By not obtaining required approval for conference related expenses, offices expended unauthorized funds. Additionally, NARA policies need to be updated to reflect the law, and to include a process to review expenses after a conference has ended. (Audit Report #14-09, dated May 1, 2014. See page 13.)
- **NARA’s Compliance with the Improper Payment Elimination and Recovery Act of 2010.** NARA’s work appeared to be sufficient and reasonable in determining agency activities were not susceptible to significant improper payments and no recapture payment audits were needed. (OIG Audit Memorandum Report #14-13, dated April 17, 2014. See page 14.)

Management Issues

- **Customer Service Weaknesses at the National Personnel Records Center (NPRC).** During this period an increasing number of veterans contacted the OIG to express frustration over customer service at the NPRC. For the period October 1, 2013 through June 30, 2014, we discovered 176,136 calls to the NPRC were not queued when the Daily Call Center was contacted. A call not queued means the system was unable to receive the call – the caller was not able to get through. In fact, only 104,096 calls were received and queued by the system during the period. However, 36,243 of these calls (35%) were abandoned before any conversation took place. Further, some veteran email requests going back to January 2014 had yet to be answered. We noted NPRC senior management was both engaged and adamant about the high level of service veterans deserved, but there appeared to be a gap between the attitude and direction of senior management and the actual service provided in day-to-day operations. (OIG Management Letter #14-18, dated September 11, 2014.)
- **Delayed Refiling May Put Records at Risk.** An investigation into permanent records found discarded in a trash bin this period determined they were “refile” records accumulated by an archivist who died in 2008. Refiles are records which have not been returned to their assigned storage folder or area. The deceased archivist’s refiles, and other orphaned records, had been placed on carts and stored in areas, including personal office space. These records are at risk of not being accounted for, or adequately safeguarded from loss, when they are not refiled in a timely manner. (OIG Management Letter #14-17, dated August 20, 2014.)

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Investigations

Significant accomplishments by the Office of Investigations (OI) during this reporting period include:

- The OI facilitated the recovery of 200 historical documents to the National Archives relating to the Department of Interior's activities pertaining to New Deal programs.
- The Archival Recovery Team (ART) recovered a Presidential pardon signed by President Millard Fillmore which had been listed on the Missing Documents website.
- The OI assisted the Naval Criminal Investigative Service in executing a search warrant at the home of a former volunteer with the Navy's archives, resulting in the recovery of 35 boxes of historical Federal records and the arrest of the subject on Federal theft charges.
- The OI worked jointly with the Atlanta Police Department to investigate and arrest a former NARA employee for a theft of funds from the Jimmy Carter Presidential Library and Museum gift shop. The subject was indicted on state theft charges, and is currently awaiting trial.
- ART recovered a Civil War letter written by General George E. Pickett that had been listed on the Missing Documents website.

The OI opened 5 investigations and 19 complaints for preliminary investigation, while closing 9 investigations and 14 complaints. At the end of this reporting period, the OI had 16 ongoing investigations and five complaints. The OI referred one assessment to NARA management for information and appropriate action. Approximately 50 percent of the investigations and complaints closed this period involved the potential alienation of NARA holdings. This number reflects continuing OI efforts to identify and investigate lost, missing, and stolen NARA holdings.

Management Assistance and Other Work

- Implemented the Whistleblower Ombudsman program by providing live training on whistleblower rules and protections to five field offices and on-line training to the entire agency by adding information to other required NARA training.
- Provided comment and input into several NARA directives and regulations covering a variety of topics. This included providing input on NARA's reorganization of their entire process for issuing and updating internal directives.
- Assisted NARA in a civil judgment collection action relating to a closed OIG investigation.
- Responded to multiple requests for OIG records under the Freedom of Information Act (FOIA), and coordinated with the Department of Justice (DOJ) on requests from the media pertaining to joint work between the DOJ and NARA.
- Reviewed legislative and OMB proposals and provided feedback to appropriate entities, and reviewed newly passed legislation for its affect on NARA and the NARA OIG.

INTRODUCTION

About the National Archives and Records Administration

Mission

The National Archives and Records Administration serves American democracy by safeguarding and preserving the records of our Government, ensuring the people can discover, use, and learn from this documentary heritage. NARA's mission is to provide public access to Federal Government records in their custody and control. Public access to government records strengthens democracy by allowing Americans to claim their rights of citizenship, hold their government accountable, and understand their history so they can participate more effectively in their government.

Background

NARA, by preserving the nation's documentary history, serves as a public trust on which our democracy depends. It enables citizens to inspect for themselves the record of what the Government has done. It enables officials and agencies to review their actions and helps citizens hold them accountable. It ensures continuing access to essential evidence documenting the rights of American citizens, the actions of Federal officials, and the national experience.

Federal records reflect and document America's development over more than 225 years. They are great in number, diverse in character, and rich in information. NARA's traditional holdings amount to nearly 4.7 million cubic feet of records. These holdings also include, among other things, letters, reports, architectural/engineering drawings, maps and charts; moving images and sound recordings; and photographic images. Additionally, NARA maintains nearly 600,000 artifact items and approximately 560 terabytes of electronic records. The number of records born and stored solely in the electronic world will only continue to grow; thus NARA developed the Electronic Record Archives to attempt to address this burgeoning issue.

NARA involves millions of people in its public programs, which include exhibitions, tours, educational programs, film series, and genealogical workshops. In FY 2014, NARA had 57.3 million online visits in addition to hosting 3.2 million traditional museum visitors, all while responding to almost one million written requests from the public. NARA also publishes the *Federal Register* and other legal and reference documents, forming a vital link between the Federal Government and those affected by its regulations and actions. Through the National Historical Publications and Records Commission, NARA helps preserve and publish non-Federal historical documents that also constitute an important part of our national heritage. Additionally, NARA administers 13 Presidential libraries preserving the papers and other historical materials of all past Presidents since Herbert Hoover.

Resources

In Fiscal Year (FY) 2014, NARA was appropriated \$386.6 million. This included \$370 million for Operating Expenses (including the operations and maintenance of the Electronic Records Archives system), \$8 million for Repairs and Restoration of NARA-owned buildings, \$4.5 million for the National Historical Publications and Records Commission (NHPRC), and \$4.13 million for IG operations. With approximately 3,036 Full-time Equivalents (FTEs), NARA operates 44 facilities nationwide.

INTRODUCTION

About the Office of Inspector General (OIG)

The OIG Mission

The OIG serves the American citizen by improving the effectiveness, efficiency, and economy of NARA programs and operations. As part of our mission, we detect and prevent fraud and abuse in NARA programs, and strive to ensure proper stewardship over Federal funds. We accomplish this by providing high-quality, objective audits and investigations, and serving as an independent, internal advocate. Unique to our mission among other OIGs is our duty to ensure NARA protects and preserves the items belonging in our holdings, while safely providing the American people with the opportunity to discover, use, and learn from our documentary heritage.

Background

The Inspector General Act of 1978, as amended, along with the Inspector General Reform Act of 2008, establishes the OIG's independent role and general responsibilities. The Inspector General reports to both the Archivist of the United States and Congress. The OIG evaluates NARA's performance, makes recommendations for improvements, and follows up to ensure economical, efficient, and effective operations and compliance with laws, policies, and regulations. In particular, the OIG:

- assesses the effectiveness, efficiency, and economy of NARA programs and operations
- recommends improvements in policies and procedures to enhance operations and correct deficiencies
- recommends cost savings through greater efficiency and economy of operations, alternative use of resources, and collection actions; and
- investigates and recommends actions to correct fraud, waste, abuse, or mismanagement.

Further, the OIG investigates criminal and administrative matters concerning the agency, helping ensure the safety and viability of NARA's holdings, customers, staff, and resources.

Resources

In FY 2014, Congress provided \$4.13 million for the OIG's appropriation, including authorization for 22 FTEs. However, mandatory spending cuts reduced this to approximately \$3.9 million. During this period the Inspector General retired, the Assistant Inspector General for Investigations (AIGI) accepted a position at another agency, and one audit position was vacated. Two audit positions were filled, and the Assistant Inspector General for Audits performed as both the Acting Inspector General and the AIGI. Currently the OIG has 16 FTEs on board, including an Acting Inspector General, one support staff, seven FTEs devoted to audits, six FTEs devoted to investigations, and a counsel to the Inspector General.

Further, the OIG remains concerned we could lack funding to investigate an incident outside of Washington, DC, at the end of the fiscal year. We believe it would not be prudent to ask for increased appropriated funds each year for such a contingency. Instead, we have sought a limited transfer provision from NARA, so we could ask for available end-of-year funds in such a circumstance. However, NARA management does not support our position and states they will not request such a transfer provision.

ACTIVITIES

Involvement in the Inspector General Community

Counsel of Inspectors General on Integrity and Efficiency (CIGIE)

Legislation Committee

The Legislation Committee provides timely information about congressional initiatives to the IG community; solicits the views and concerns of the community in response to legislative initiatives and congressional requests; and presents views and recommendations to congressional committees and staff, the Government Accountability Office, and the Office of Management and Budget on issues and legislation affecting the IG community. The OIG continues to serve as a member of the CIGIE Legislation Committee. OIG counsel is involved in drafting the Committee's comments to Congress on potential legislation, and in other aspects of the Committee's work such as drafting a congressional relations guide.

Federal Audit Executive Council (FAEC)

The Assistant Inspector General for Audits (AIGA) continued to serve as a representative to the FAEC. The AIGA attended FAEC's meeting to discuss topics such as financial statement audit issues, audit training, opinion reports on internal controls, and information security.

Assistant Inspectors General for Investigations (AIGI) Committee

The AIGI Committee is a standing subcommittee to the CIGIE Investigations Committee, serving as a conduit for suggestions, issues, and concerns affecting the OIG investigations community. As a member, the former AIGI helped provide guidance, assistance, and support to the CIGIE Investigations Committee in the performance of its duties.

Investigations Committee Program Fraud Civil Relief Act Working Group

As a member of the Investigations Committee Program Fraud Civil Relief Act (PFCRA) working group, the OIG counsel continued to contribute to promoting the use of PFCRA throughout the IG community, including drafting part of a PFCRA manual adopted for IG-wide use.

Council of Counsels to Inspectors General (CCIG)

The OIG counsel continues to be an active member of the CCIG. The CCIG provides a rich environment wherein legal issues can be raised and interpretations can be presented and reviewed with an experienced network of OIG lawyers.

CIGIE Training Institute

The OIG counsel continued to work with the CIGIE Training Institute teaching the IG Authorities course. Counsel also was chosen to attend CIGIE's adjunct instructor program at the Federal Law Enforcement Training Center.

Whistleblower Ombudsman Working Group (WOWG)

In accordance with the spirit of the Whistleblower Protection Enhancement Act of 2013, the OIG formed a whistleblower ombudsman program, and is working with the WOWG to learn best practices and implement an effective training program.

ACTIVITIES

Peer Review Information

Peer Review of NARA OIG's Audit Organization

The NARA OIG audit function was last peer reviewed by the Federal Deposit Insurance Corporation OIG in accordance with the Government Accountability Office's *Government Auditing Standards* (GAS) and CIGIE's *Guide for Conducting External Peer Reviews of the Audit Organizations of Federal Offices of Inspector General*. FDIC OIG concluded "the system of quality control for the audit organization of the NARA OIG, in effect for the 12-months ended September 30, 2013, has been suitably designed and complied with to provide the NARA OIG with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. Federal audit organizations can receive a rating of *pass*; *pass with deficiencies*, or *fail*. NARA OIG has received a peer review rating of *pass*."

The peer review report's accompanying letter of comment contained fourteen recommendations that, while not affecting the overall opinion, were designed to further strengthen the system of quality control in the NARA OIG Office of Audits. In responding to the recommendations, we committed to completing recommended actions by September 30, 2014. We completed actions for all but two recommendations.

Outstanding Recommendations: The FDIC OIG recommended that the Acting Inspector General revise the Procedures Manual to (1) require that auditors request a description of planned corrective actions to address recommendations from NARA management before finalizing audit reports and memoranda, and (2) include a process for addressing situations in which NARA management does not provide corrective action plans in its responses to audit reports and memoranda. The corrective actions necessary also involved changing NARA management's process, which they were not able to immediately implement. Full implementation is anticipated by March 31, 2015. There are no other outstanding recommendations from any peer review of the NARA OIG conducted by another Office of Inspector General that have not been fully implemented.

Peer Review of NARA OIG's Office of Investigations

NARA OIG's Office of Investigations was last peer reviewed by the National Science Foundation in May 2008. There are no outstanding recommendations from this review.

In February 2012, the Attorney General of the United States granted the Inspector General's application for statutory law enforcement authority. Accordingly, the OI has begun preparations for the now mandatory peer review that must be completed within three years of being granted statutory authority. The peer review is currently scheduled for Fiscal Year 2015.

ACTIVITIES

Response to Congressional Items

Letter Regarding Inspector General Access to Information

The Acting Inspector General signed a letter with 46 other Inspectors General in support of the principle that effective oversight requires complete, unfiltered, and timely access to agency information. Several agencies had ignored the clear mandate of Section 6(a) of the Inspector General Act in response to requests by their respective Inspectors General for access to critical agency records. The actions of these agencies were inconsistent with the plain language of the Inspector General Act, undermined the independence of Inspectors General, and risked leaving agencies insulated from scrutiny and unacceptably vulnerable to mismanagement and misconduct.

The Government Charge Card Abuse Prevention Act of 2012, P.L. 112-194

This law requires the OIG to conduct, at minimum, annual assessments of the agency's purchase card program and to perform analysis or audits, as necessary, of purchase card transactions. To accomplish the annual assessment of NARA's purchase card program we reviewed risks and controls already identified in our prior audits, NARA guidance, NARA's response to Federal Managers' Financial Integrity Act requirements, and risks identified in an independent public accountant's work on NARA's financial statement audits. We discussed with or received input from NARA staff and reviewed prior reports and identified open recommendations. We reviewed data on the number of card holders, limits, amounts, and number of transactions. During this process, we developed a risk assessment of NARA's purchase card program. Based on the number of purchase card holders and amount spent in FY 2013 using purchase cards, we assess the risk over NARA's purchase card activity as moderate. We determined, except for some related open recommendations, NARA has effective policies, procedures, and monitoring controls.

Reports requested by Members of the Senate

In response to an ongoing request we provided members of the Senate with information on all closed investigations, evaluations, and audits that were not disclosed to the public.

Inventory of Commercial Activities

We submitted to OMB our FY 2014 inventory of commercial activities performed by OIG employees as required under the Federal Activities Inventory Reform Act of 1998 (the FAIR Act). OMB is required to list the available inventories in the Federal Register. The agency head transmitted a copy of the inventory to Congress, and made it available to the public on www.archives.gov.

AUDITS

Audit Overview

This period, we issued:

- six final audit reports,
- one audit memorandum,¹ and
- two management letters.²

We completed fieldwork on audits of:

- NARA's Mobile Device Management, evaluating the agency's efforts to secure and deploy mobile devices on the NARA network, and to maintain and to adequately dispose of these devices.
- NARA Information Security Program, determining the effectiveness of the program and practices in use.
- Specially Protected Records (SPRs), determining whether offices are protecting, controlling, handling, and accounting for SPRs in accordance with NARA guidance.

We initiated or continued work on audits of:

- NARA's Digitization Partnerships, determining the economy, efficiency and effectiveness of the partnerships program.
- NARA's Processing of Military Personnel Records at the National Personnel Records Center (NPRC), assessing the effectiveness and adequacy of management controls for accounting for and managing records at the NPRC.
- NARA's Human Resource Systems, assessing the security controls over the systems processing or storing of human resource data, and evaluating the validity of the data entered into the system.
- NARA's Digitization Storage and Transfer Capabilities, evaluating NARA's current processes for the storage and transfer of digitized records.

¹ An audit memorandum is used when an audit is performed in accordance with GAO's generally accepted government auditing standards (GAGAS) and there are either no findings or the findings are insignificant.

² Management letters are used to address issues which need to be quickly brought to the Archivist's or management's attention. They do not follow GAGAS, nor are they intended to.

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Audit Summaries

Effectiveness of NARA's Enterprise Wireless Access

The OIG contracted with Cotton and Company LLP to assist in assessing the extent to which NARA's policies, procedures, and technical controls provide adequate security over its employee and guest wireless networks. Overall, NARA is not effectively managing the agency's wireless environment to ensure appropriate security controls over wireless are identified, documented, and periodically tested for effectiveness. As a result, the audit identified weaknesses in each of the areas tested during the review of NARA's information security policies, procedures, and technical controls over the agency's wireless network. Further, the audit identified a number of wireless security weaknesses that, if exploited, could adversely impact the confidentiality, integrity, and availability of NARA's data and information systems and could ultimately have a negative impact on the agency's ability to protect the security of its information or information systems.

The results call into question whether management has a clear understanding of the current or potential risks related to the use of the agency's wireless technology. The audit made five recommendations, and management concurred with all of them. (OIG Audit Report #14-10, dated May 15, 2014.)

Electronic Records Archives Executive Office of the President Data Migration Project

The Electronic Records Archives (ERA) is a major information system intended to preserve and provide access to massive volumes of all types and formats of electronic records, independent of their original hardware or software, including Presidential records. The Executive Office of the President (EOP) instance of ERA was originally deployed in December 2008 to preserve and provide authorized access to electronic records under the Presidential Records Act (PRA). ERA EOP is NARA's private, secure, internal archival management system that ingests, stores, and controls access among authorized users allowing them to search, manage, and output, electronic records under the PRA.

In September 2013, a contract valued over \$3.7 million was awarded for Hitachi application support services, data migration, and search engine ingest process creation and refinement. The scope of the work included migrating approximately 82 terabytes of managed archival data (records and metadata) in a variety of proprietary and open-source formats from the George W. Bush Presidential Administration (i.e., EOP 43) to EOP 44. Included in this data are over 200 million emails and more than 13 million photos.

The audit found the search capabilities of the upgraded EOP were not functioning correctly. For example, when performing a "contains exactly" or "ordered near" query, certain characters (such as hidden characters or some common symbols) cause the query to fail. Further, EOP 44 is unable to perform EXACT searches against email header fields (e.g., to, cc, bcc, subject). These weaknesses were caused by the way the data was indexed. As a result, the data migration project will take longer than planned, and NARA has funded more than \$350,000 for additional

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testing and operations and maintenance costs. (OIG Audit Advisory Report #14-14, dated May 28, 2014.)

NARA's Capital Planning and Investment Control (CPIC) Process

NARA's Capital Planning and Investment Control (CPIC) process addresses Clinger-Cohen Act requirements by integrating the planning, acquisition, and management of capital assets into the budget decision-making process. The CPIC process is intended to assist agency officials and project managers in improving asset management and in complying with requirements so that agency mission goals may be achieved and citizens are better served. This audit assessed whether NARA's CPIC process and procedures were adequate, efficient, and in adherence with governing NARA policy as well as applicable federal laws and regulations. We found:

- NARA had not been following its formal, documented CPIC policy since approximately March 2013. In its place, NARA was following a new business process flow and governance model that had not been thoroughly documented or promulgated for the CPIC process.
- Several projects bypassed NARA's CPIC process even though the projects met the criteria to be included. In addition, we also identified several projects that did not complete all of the elements required of projects going through NARA's CPIC process.

We made nine recommendations, and management concurred with all of them. (Audit Report #14-08, dated April 17, 2014.)

Selected Aspects of NARA's Digitization Program

Over the past decade, NARA has consistently identified "access" as a key agency initiative. A component of this initiative includes the digitization of NARA's traditional holdings. NARA's most recent Strategic Plan (FY 2014–2018) established "public access" as its core purpose, with an objective to make all records available to the public in digital form to ensure that anyone can explore, discover, and learn from NARA's holdings. This audit reviewed NARA's Digitization Program to determine whether management controls were adequate to address agency and customer needs and ensure greater access to NARA's holdings.

Our audit found NARA's Digitization Strategy and Policy had not been updated in over five years, despite significant management changes and NARA's increased reliance upon its Digitization Program to support the agency's overall mission and strategic goals related to public access. Further, although NARA's Digitization Strategy states a combination of approaches will be used in digitizing and making holdings available online, management had yet to fully and adequately implement all of the identified approaches. Finally, although NARA has reported progress in its efforts to digitize traditional records, this reported progress does not fully and transparently reflect the quantity of records in which NARA has made accessible online for public use. We made 11 recommendations, and management concurred with all of them. (OIG Audit Report #14-12, dated July 3, 2014.)

AUDITS

Special Telework Arrangements

Federal telework programs are established primarily to meet agency mission and operational needs. In July 2013, NARA management identified 29 unique telework arrangements including full-time and long-distance telework, and requested the Office of the Inspector General (OIG) perform an audit in this area.

NARA's telework program suffers from a lack of effective oversight and weak internal controls. NARA could have realized \$63,408 in funds to better use if special telework arrangements were more effectively managed. We identified several areas where improvement is needed to ensure special telework arrangements are administered in accordance with policy and procedures, and are in NARA's best interest. These include:

- Current telework agreements were not available for 18 of the 29 special arrangements.
- Telework agreements for long distance telework were not always approved by the appropriate Executive or Staff Director.
- One employee did not have the correct duty station, and as a result was overpaid approximately \$4,447 over a 14 month period due to the differences in locality pay.
- At least half of the special telework arrangements resulted in increased travel costs to NARA for the employees to periodically return to their normal worksite for face to face meetings with colleagues or attend training events.
- Travel expenses for long distance telework employees to return to their normal worksite on official business were not always correctly reimbursed.
- Most of the special telework arrangements we reviewed were entered into without a specific time limit.

NARA supervisors used several different techniques to effectively monitor telework employees. Opportunities exist to take advantage of best practices for managing special telework arrangements. Sharing this information across NARA would assist supervisors responsible for monitoring telework employees' productivity and performance. We made 11 recommendations, and management agreed with all of them. (OIG Audit Report #14-11, dated May 5, 2014.)

Conferences Related Activities and Expenses

We determined NARA's conference guidance addresses, and in some cases exceeds, Office of Management and Budget directives on conferences. We also determined NARA had taken initiative to reduce conference expenses. However, we identified NARA could have realized \$193,942 in funds to better use had stronger internal controls over conference-related activities and expenses been implemented. We noted the Accounting Policy and Operations Branch (BCA) was not effectively monitoring conference-related activities and expenses. Specifically, we found:

- The appropriate office was not aware of all conferences held.
- Conferences were held without authorization.
- The OIG was not always notified when conference expenses were over \$20,000.

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- There was no mechanism in place to review approved conference expenses after conferences occurred.

We made three recommendations, and management concurred with all of them. (Audit Report #14-09, dated May 1, 2014.)

NARA's Compliance with the Improper Payment Elimination and Recovery Act of 2010

As required by Section 3(b) of the Improper Payments Elimination and Recovery Act of 2010, the OIG completed an independent review of NARA's improper payment reporting in NARA's FY 2013 Performance and Accountability Report (PAR) and accompanying materials. NARA's FY 2013 PAR did not identify any programs or activities susceptible to significant improper payments, and NARA determined payment recapture audits would not be cost-effective. We reviewed NARA's internal control tests and reviews used to identify improper payments and believe NARA instituted sufficient internal controls to identify improper payments. (OIG Audit Memorandum Report #14-13, dated April 17, 2014.)



INVESTIGATIONS

Investigations

The Office of Investigations (OI) receives and evaluates complaints, and conducts investigations related to fraud, waste, and abuse in NARA programs and operations. This includes identifying and recovering alienated NARA holdings. Investigations showing violations of Federal law, NARA Directives, or contract terms/specifications may result in administrative sanctions, civil action, or criminal prosecution. Such actions can include employee terminations, contractor debarments, and court-imposed prison terms, probation, fines, or restitution. The OI may also issue Management Letters detailing systemic or timely problems or vulnerabilities, and offer recommendations on how to correct them.

OI activities are broadly divided into two groups: general investigations and archival recovery investigations. General investigations encompass the entire spectrum of criminal and administrative investigations, including such topics as procurement fraud, employee misconduct, and cyber crimes. Archival recovery investigations revolve around protecting NARA's historical holdings and returning items missing from NARA's collection.

The OI has statutory law enforcement authority, and is presently staffed with five 1811 series criminal investigators and an investigative archivist. The OI is based in the National Archives at College Park, MD (Archives II), but conducts investigations at all NARA locations across the country. The OI maintains a close relationship with NARA Security Services to coordinate law enforcement efforts impacting NARA. Specifically, the investigative archivist routinely coordinates efforts with the Holdings Protection Team, a NARA Security Services unit charged with proactively protecting and securing NARA holdings. We also liaise with the Department of Justice (DOJ), the OIG community, and other law enforcement agencies and organizations.

Investigative Initiatives

The OI conducts Investigative Initiatives to proactively identify and test vulnerabilities in NARA programs and operations, and address other OIG concerns. As part of this program, the OI periodically assesses the agency's vulnerability to fraud, archival theft, and loss of sensitive electronic data. These assessments may also be undertaken to review such things as employee conflicts of interest, systemic weaknesses in operations and controls, incident responses taken by NARA, and other administrative and criminal topics. Assessments are limited in scope to quickly identify relevant information and transmit it to NARA management for appropriate consideration or action.

This period, the OI conducted another assessment of critical incident law enforcement response plans at a NARA facility. The OI issued a report to NARA management, and in response NARA stated they will take necessary actions to improve their plans and procedures. In previous periods the OI issued Assessment Reports related to critical incident law enforcement response plans at a different NARA facility, and researcher registration procedures. NARA responded favorably to both reports.

The OI also collects information and documents general investigative activity in Intelligence Files to improve our own efficiency and enhance the OI's operational knowledge of NARA

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programs, operations, and facilities. This period, the OI maintained Intelligence Files related to archival recovery, information security, and computer crimes.

Overall Activity Summary

At the end of the last reporting period, 20 investigations were open. During this reporting period, the OI opened 5 investigations and closed 9. The OI referred 2 of the closed investigations to NARA for action. At the end of this reporting period, 16 investigations were open.

General Investigations

Updates on Previously Reported General Investigations

Allegations of Fraud

The OI continues to investigate allegations private companies failed to comply with elements of cooperative agreements.

Theft of Funds from a Presidential Library

The OI worked jointly with the Atlanta Police Department to investigate and arrest a former NARA employee for the theft of funds from the Jimmy Carter Presidential Library and Museum gift shop. The subject was indicted on theft charges through the Fulton County District Attorney's Office and is currently awaiting trial.

Removal and Destruction of Records

The OIG referred this matter to agency management for consideration to notify additional potentially affected veterans.

Missing Laptops

The OI continues to investigate three missing laptop computers from a NARA facility.

New General Investigation Highlights

Potential Employee Improper Contract Practices

The OI initiated an investigation into allegations of employee misconduct relating to potential improper contract practices involving an IT services contract.

Alleged Employee Misconduct

The OI opened an investigation into potential abuse of the Public Transit Subsidy Program (PTSP) and time and attendance fraud. The OI did not substantiate abuse of the PTSP, but found there was a possible abuse of time and attendance fraud potentially worth approximately \$200.

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Archival Recovery Team (ART) Activity

ART is a concept that embodies the OI's focus on recovering alienated Federal records. ART is the teaming of agents with the expertise of an investigative archivist. These teams often work with NARA archivists, the Holdings Protection Team, and other law enforcement organizations responsible for investigating thefts, loss, or trafficking of cultural artifacts and fine art.

Thefts

ART investigates all allegations of theft of NARA holdings. Thefts may be internal or external and involve NARA employees, contractors, interns, or researchers. ART refers all instances of substantiated theft to the DOJ for potential criminal prosecution. ART also refers internal thefts to NARA management for administrative action.

Non-criminal Recoveries

Individuals may intentionally or unknowingly alienate a Federal record before it is accessioned into NARA's holdings. Once identified, alienated records are subject to recovery through a legal process known as replevin, a common law action to recover property unlawfully taken.

If ART receives allegations a record or item was alienated, our investigative archivist helps establish if the record should have been accessioned into NARA's holdings. If the record should have come to NARA, ART refers this substantiation to the NARA Office of General Counsel (NGC) to begin the replevin process or other methods of recovering the document, such as voluntary donation. If the holder of the document is unwilling to release or donate a document, NGC may also pursue recovery through the DOJ civil division.

Proactive

Tips from our public sentinels are critical to successfully recovering our nation's records. To leverage the power of their knowledge, ART engages in a variety of initiatives to establish relationships within the historical artifacts community, and the public at large. Several times every year, ART staffs a display at various historical artifact shows throughout the country. In this reporting period, ART attended the Northern Virginia Relic Hunters Civil War Show and the Gettysburg Civil War Show.

ART maintains a Facebook page updating the public about upcoming shows and ART happenings, along with other newsworthy items about document thefts, investigations, and recoveries at NARA and other institutions worldwide. ART received 3,266 "likes" on its Facebook page this reporting period. Visit the site at www.facebook.com/archivalrecoveryteam.

In this reporting period, ART also relied upon a NARA volunteer to search an Internet auction site for Federal documents. Finally, ART reviews NARA holdings, identifying items at risk for theft and making recommendations to NARA about what records should be restricted or protected.

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Missing Documents

Working in conjunction with NARA, ART has established a listing of documents identified as missing from NARA holdings. Some of these documents are known to have been stolen, but have never been recovered. Others have simply been identified by NARA archivists or researchers as missing. In both cases, ART has little or no evidence to work with, so the documents are listed on the NARA website in the hope of receiving viable leads to recover these materials. During this period, ART received seven complaints from the public and NARA staff about Federal items for sale through online auction sites. ART's Missing Documents email also received ten inquiries this period.

Please visit the website at www.archives.gov/research/recover/missing-documents.html to learn more. If you have information about any documents listed on the site or believe you have seen a Federal document in private hands, please email ART at MissingDocuments@nara.gov.

Updates on Previously Reported ART Investigations

Document Signed by Revolutionary War General

ART had previously discovered a document signed by Revolutionary War General Peter Muhlenberg for sale. The document is consistent with holdings at the NARA Mid-Atlantic region. ART previously referred this document to management for recovery, but additional investigation is now necessary to determine to whom the document was sold. The investigation is ongoing.

Missing Historical World War II Movies

The OI continues investigating allegations original historical World War II movies are missing from the National Archives in College Park, MD. However, copies exist, allowing uninterrupted access to the records.

Recovery Related to Theft of Sound Recordings

The OI continues efforts to locate and recover sound recordings stolen and sold by a former NARA employee.

Misuse of Federal Records

The OI continues to assist in an investigation of alleged misuse of Federal records pertaining to a potential fraud scheme.

Recovery of a U.S. Army Continental Command Record

ART recovered a Weekly Station & Effective Force Report for the 2nd Cavalry Division, dated October 2, 1865, and authored by Major General George Custer. The report had been listed on the Missing Documents webpage, and an investigation is ongoing.

Missing Andrew Jackson Presidential Pardon

The OI continues investigating allegations involving a missing Andrew Jackson pardon issued to Zachariah Smith on August 18, 1835. The pardon had been listed on the Missing Documents webpage.

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Recovery of Holdings From Another Federal Archives

ART assisted in a joint investigation with the Naval Criminal Investigative Service in executing a search warrant at the home of a former volunteer with the Navy's archives, resulting in the recovery of 35 boxes of historical Federal records and the arrest of the subject on Federal theft charges. The joint investigation remains ongoing.

Recovery of Document from Civil War Prize Case File

Because of a report from a private researcher, the OI recovered a letter dated August 12, 1862, from the Pennsylvania Civil War Prize case file for the CSS *Defiance*. The record was traced back to a former NARA employee previously convicted for theft of NARA holdings.

New ART Investigative Highlights

Recovery of a Millard Fillmore Presidential Pardon

The OI recovered a missing Millard Fillmore pardon issued to William Humphries, dated February 23, 1853 and listed on the Missing Documents webpage. The record was traced back to a former NARA employee previously convicted for theft of NARA holdings.

Records Allegedly For Sale

Records from an affiliated archive were allegedly for sale on an Internet auction site. A joint investigation is ongoing with the agency in charge of the affiliated archive.

Potential Theft of Bureau of Indian Affairs Records

A NARA regional facility reported an alleged theft of Bureau of Indian Affairs records relating to water rights. An investigation is ongoing.

Artifact Potentially Missing from Presidential Library

An artifact potentially missing from a Presidential Library was found offered for sale. An investigation is ongoing.

Recovery of National Park Service Records Relating to the New Deal

The OI assisted NARA in recovering one linear foot of historic National Park Service records relating to the New Deal. The records were the official work product of two former Department of Interior employees working in conjunction with the National Park Service. The employees, now deceased, had maintained the records at their personal residences.

United States Senate Committee Records

The OI received allegations records belonging to the United States Senate Select Committee on Improper Activities in Labor and Management were located on private property. An investigation is ongoing.

Recovery of Civil War Era Document

The OI recovered a letter written by General George Pickett after a local dealer reported the letter was placed on consignment in their store.

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Attempted Theft of NARA Holdings

The OI opened an investigation into the attempted theft of a NARA motion picture recording by a private researcher.

New Lead on Closed Theft Investigation

The OI initiated a new investigation after previously reported stolen/missing items came up for auction overseas.

Referrals for Recovery of Alienated Documents

The following referrals either remained ongoing or were acted on during this reporting period.

- Alienated State Department Document for Sale
A NARA researcher found a document for sale that may be part of a State Department record. The historically significant document contains handwritten annotations from President Franklin D. Roosevelt. NARA management continues to consider recovery.
- Historic Letter for Sale
ART found a letter for sale believed to have been alienated from NARA holdings. The letter is dated May 12, 1861, and concerns troops being fired upon by a mob in St. Louis, MO. NARA management continues to consider recovery.
- Classified Documents in Personal Papers
Classified documents were found among personal papers donated to a public university. Presidential library staff members continue to review the documents for declassification and to identify any which should be among NARA's holdings.

Computer Crimes Unit

In 2005, NARA OIG established a Computer Crimes Unit (CCU) within the OI. The CCU provides laboratory and field support for digital evidence seized or surrendered to the NARA OIG or other law enforcement agencies working with us. Digital evidence forensic support services can include, among other things, computer forensic examinations on seized digital media, on-site computer hard drive imaging, expert witness testimony, data analysis to determine evidentiary value, and technical training. The CCU is staffed by one full-time 1811 series computer crimes investigator. During this reporting period, the CCU completed forensic examinations in support of criminal and administrative investigations related to computer misuse, suspected access fraud, and threats against NARA employees.

New CCU Investigative Highlights

Unauthorized Facility Access

The CCU provided investigative support relating to an investigation into the misuse of a government facility after normal business hours. This investigation is still ongoing.

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Material False Statements

The CCU provided investigative support in an investigation where a NARA employee made material false statements to an investigator during another investigation; the employee subsequently resigned.

Computer Misuse

As reported in the last semiannual report, the CCU independently developed evidence a NARA employee misused a NARA computer to access and store pornography. The OI substantiated the allegation and provided evidence to NARA resulting in personnel action being initiated against the employee.

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 email communication from NARA's internal network or the Internet through the Hotline email system. Walk-ins are always welcome. Visit <http://www.archives.gov/oig/> for more information, or contact us:

- **By telephone**
Washington, DC, Metro area: (301) 837-3500
Toll-free and outside the Washington, DC, Metro area: (800) 786-2551
- **By mail**
NARA OIG Hotline
P.O. Box 1821
Hyattsville, MD 20788-0821
- **By email**
oig.hotline@nara.gov
- **By Fax**
(301) 837-0879
- **By online referral form**
<http://www.archives.gov/oig/referral-form/index.html>

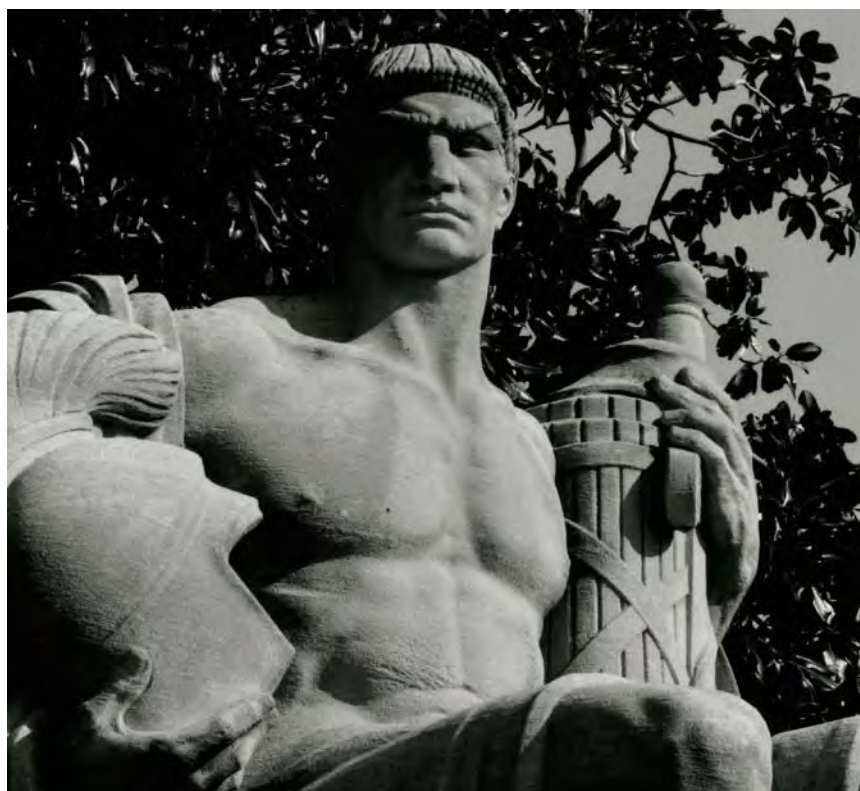
The Office of Investigations promptly and carefully reviews calls, letters, and email to the Hotline. We investigate allegations of suspected criminal activity or civil fraud and conduct preliminary inquiries on non-criminal matters to determine the proper disposition. Where appropriate, referrals are made to OIG audit staff, NARA management, or external authorities. Substantive Hotline contacts are captured as complaints in the Office of Investigations.

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<u>Hotline Activity for the Reporting Period</u>	
Hotline contacts received ³	54
Hotline contacts opened to Complaints	8
Hotline contacts referred to other entity	7
Hotline contacts closed to file	23
Hotline contacts referred to OIG audit staff	4
Hotline contacts referred to NARA management	10
Hotline contacts pending resolution	2

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 <http://www.archives.gov/oig/contractor-form/index.html>.



³ This reporting period the method of determining what was counted as a hotline contact was revised, resulting in an increase. Further, computer and management issues caused the delivery of some previous hotline contacts to be delayed until this period. These issues have been resolved.

SIGNIFICANT DISAGREEMENTS

Disagreements with Significant Management Decisions

Under the IG Act, as amended, the OIG reports “information concerning any significant management decision with which the Inspector General is in disagreement.” The following disagreements have been reported previously, but as nothing has changed, they remain an issue.

In November 2013, we reviewed NARA’s FY 2013 Draft Federal Manager’s Financial Integrity Act (FMFIA) statement. We disagreed with the assurance statement for the Section 2 FMFIA requirements as the agency had not implemented an entity-wide internal control program (ICP). Without an ICP the agency cannot identify all existing risks and potential material weaknesses across the agency. Until NARA fully implements an ICP it will continue to underreport material risks related to NARA programs. Additionally, we believe the FY 2013 agency assurance statement underreported material weaknesses and did not accurately reflect the breadth of risks in NARA’s Processing, Electronic Records Management, and Information Security Programs.

NARA’s Processing Programs

NARA’s FY 2012 assurance statement downgraded the Processing Program from a material weakness to a reportable condition. NARA made this decision based on the current state of Federal records processing, the strides the agency has made in the last six years, and the current focus on reengineering processing work. Although the agency has made progress in processing records by reducing the backlog to 40% of NARA’s holdings, we believe the agency should continue to identify the program as a material weakness. We base this decision on the following:

- In September 2012, Processing Program management reported to the Management Control Oversight Council that the large backlog of unprocessed traditional records impedes NARA’s ability to provide efficient and effective access and impacts NARA’s mission. Additionally, they believed serving unprocessed records (or inadequately processed records) to researchers could result in the unintentional disclosure of restricted or controlled information (e.g. law enforcement, personally identifiable, or other restricted information). Some of these concerns remain outstanding.
- The findings from our recent Audit of NARA’s Processing Program indicate work remains to be done and additional controls need to be put in place to address the backlogs. These findings include:
 - (1) Various studies have been conducted and are ongoing, but confusion still exists in management on the current definition of processing and what procedures actually constitute processing of records at NARA.
 - (2) There is a lack of coordination between the Fields, Libraries, and Research Services as there is no one group providing oversight over the Processing Program. While there is an agency-wide processing goal, the individual areas (Research Services, Regions, and Libraries) are operating in silos regarding plans on how to decrease their individual backlogs and meet the overall agency goal.
 - (3) Some Fields are still using old guidance and processing plans from 2008 to process their backlog. These processing plans have not been revised to reflect each location’s varying levels of backlog and resource availability.

SIGNIFICANT DISAGREEMENTS

Until these factors are addressed, NARA's ability to meet its mission will be affected.

NARA's Electronic Records Management Program

NARA's FY 2012 assurance statement reported the Electronic Records Management program as a control deficiency instead of a material weakness. This decision was predicated on the issuance of a Presidential Memorandum and OMB M-12-18, Managing Government Records Directive. This is an Executive Branch-wide effort to reform records management policies and practices, and to develop a 21st-century framework for the management of Government records. As a result of the Directive, the Office of Chief Records Officer (CRO) has established a project management team to carry out implementation and oversight of the activities contained in the directive.

Management believes the activities in OMB M-12-18 will guide the development of the CRO's operational plans for years to come and serve as an action plan against which NARA can monitor and assess progress. However, the directive does not mitigate the existing risks outlined in our 2010 audit report, OIG #10-04, *NARA's Oversight of Electronic Records Management in the Federal Government*. The report found NARA did not have adequate controls in place to protect permanent Federal electronic records from loss. Specifically, we reported NARA could not reasonably ensure permanent electronic records are being adequately identified, maintained, and transferred to NARA in accordance with Federal regulations. Until sufficient controls are implemented to minimize these risks, NARA should classify this as a material weakness.

NARA's Information Security Program

The Information System and Technology Security (IS&TS) was downgraded by management in FY 2013 to a reportable condition from a material weakness. This decision was based on management's assertion various processes have been revamped to address prior recommendations, including application of a new risk-ranking methodology, and use of metrics to monitor progress. We believe, as we did in previous years, that management's assessment does not represent the true material weakness. Actions taken to risk-rank open recommendations, and to develop metrics to track how Information Service is managing recommendations, will not be sufficient to correct the underlying problems continuing to plague NARA's IS&TS. The underlying issue is not NARA's progress in closing open recommendations, but rather its inability to successfully establish a program that identifies, reports, and mitigates security concerns.

Further, OIG, the Government Accountability Office (GAO), and internally contracted studies continue to identify information security areas where policies or procedures are needed, or where management needs to implement existing policies and procedures. While NARA has made some progress in establishing IT security policies, documented procedures still must be developed from those policies. Once both policies and procedures are in place, NARA can begin to implement them and ensure they are being followed by testing. Until this happens, and the IS&TS program has defined roles and responsibilities, continuous monitoring of internal controls, and repeatable processes, it will continue to be a material weakness.

TOP TEN MANAGEMENT CHALLENGES

Overview

Under the authority of the Inspector General Act, the NARA OIG conducts and supervises independent audits, investigations, and other reviews to promote economy, efficiency, and effectiveness; and to prevent and detect fraud, waste, and mismanagement. To fulfill our mission and help NARA achieve its strategic goals, we have aligned our programs to focus on areas we believe represent the agency's most significant challenges. We have identified those areas as NARA's top ten management challenges.

1. Electronic Records Archives

NARA initiated the Electronic Records Archive (ERA) program in order to address the challenge of ingesting, preserving, and providing access to our nation's electronic records for as long as needed. However, virtually since inception the program has been fraught with delays, cost overruns, and technical shortcomings and deficiencies identified by our office and the Government Accountability Office (GAO). In August 2010, the Office of Management and Budget (OMB) placed ERA on its high-priority list of 26 high-risk Federal IT projects. On September 30, 2011 the development contract between NARA and Lockheed Martin Corporation concluded. However, many core requirements were not fully addressed, and ERA lacks the originally envisioned functionality.

The program is now in an Operations and Maintenance (O&M) phase under a 10-year, \$240 million contract with IBM. The O&M tasks to be performed by IBM, under a firm-fixed-price (FFP) arrangement, include help desk operations, incident management, problem management, hardware and software maintenance, asset and configuration management, deployment management, capacity management, availability management, security services, backup and recovery services, and ingest operations. The contract also includes replacing and updating the technologies comprising ERA, and correcting and adapting ERA functionality as necessary to meet stakeholder needs. These additional tasks will be performed under Technical Direction Letters (TDLs), which may be either FFP or time-and-materials (T&M) arrangements.

ERA faces many challenges going forward, including addressing increased volumes of data to be ingested and support for increased numbers of users now that ERA use is mandatory for all Federal agencies. However, the greatest challenge will be NARA's ability (with vendor support) to effectively meet stakeholder needs while operating and maintaining a system whose development failed to meet core benchmark requirements and lacks originally envisioned capabilities. Additionally, NARA needs to start planning for a significant number of electronic records from the Executive Office of the President, as there will be a change of administration after the 2016 election.

2. Improving Records Management

Part of NARA's mission is safeguarding and preserving the records of our government, thereby ensuring people can discover, use, and learn from this documentary heritage. NARA provides continuing access to the essential documentation of the rights of American citizens and the actions of their government. The effective management of these records is key to accomplishing this mission. NARA must work with Federal agencies to ensure the effective and efficient

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appraisal, scheduling, and transfer of permanent records, in both traditional and electronic formats. The major challenge is how best to accomplish this component of our overall mission while reacting and adapting to a rapidly changing technological environment in which electronic records, particularly email, proliferate. In short, while the ERA system is intended to work with electronic records received by NARA, we need to ensure the proper electronic and traditional records are in fact preserved and sent to NARA in the first place.

In November 2011, a Presidential Memorandum titled *Managing Government Records* was issued. This began a new executive branch-wide effort to reform records management policies and practices. In August 2012, the Office of Management and Budget (OMB) issued Memorandum 12-18, *Managing Government Records Directive*, creating a robust records management framework. This Directive requires agencies, to the fullest extent possible, to eliminate paper and use electronic recordkeeping. It is applicable to all executive branch agencies and to all records, without regard to security classification or any other restriction. This Directive also identifies specific actions to be taken by NARA, OMB, and the Office of Personnel Management (OPM) to support agency records management programs. Agencies must manage all permanent electronic records in an electronic format by December 31, 2019, and must manage both permanent and temporary email records in an accessible electronic format by December 31, 2016. NARA, its Government partners, and Federal agencies are challenged with meeting these deadlines, determining how best to manage electronic records in accordance with this guidance, and how to make electronic records management and e-Government work more effectively. GAO is currently reviewing Federal agencies' efforts to comply with Memorandum 12-18. Until sufficient controls have been implemented to protect permanent Federal electronic records from loss, NARA should classify electronic records management as a material weakness.

3. Information Technology Security

The Archivist identified IT Security as a material weakness under the Federal Managers' Financial Integrity Act reporting process from FY 2007 to FY 2012. In 2013, NARA reclassified and downgraded the material weakness in IT security to a reportable issue. This is concerning as audits and assessments continually identify significant improvements and focused efforts are needed to establish a mature information security program. Further, there are identified vulnerabilities which still present an extreme risk to the agency and its sensitive data.

Annual assessments of NARA's compliance with the Federal Information Security Management Act have consistently identified program areas in need of significant improvement. NARA has some elements of an information security program but real progress will not be made until NARA establishes an effective system of internal control for information security. The confidentiality, integrity, and availability of our electronic records and information technology systems are only as good as NARA's IT security program infrastructure.

In FY 2012, an assessment performed by contractors identified multiple deficiencies with NARA's network architecture, many of which stem from the lack of strategic planning with regard to the redundancy, resiliency and overall design of the network. These issues not only allow for security and performance problems, but they inhibit NARA IT management from effectively establishing a tactical and innovative strategy for the next generation of NARA's

TOP TEN MANAGEMENT CHALLENGES

network. Each year, risks and challenges to IT security continue to be identified. NARA must ensure the security of its data and systems or risk undermining the agency's credibility and ability to carry out its mission.

4. Expanding Public Access to Records

The records of a democracy's archives belong to its citizens. NARA's challenge is to more aggressively inform and educate our customers about the services we offer and the essential evidence to which we can provide access. Unfortunately, approximately 32 percent of NARA's textual holdings have not been processed to allow efficient and effective access to them. To meet its mission, NARA must work to ensure it has the processes and resources necessary to establish intellectual control over this backlog of unprocessed records. However, NARA's FY 2012 assurance statement downgraded the Processing Program from a material weakness to a reportable condition. This is concerning as audits have identified multiple issues with the program, including the fact NARA lacks a strategic direction. Further, NARA reports unprocessed records by giving the percentage of records which have been processed. However, this can lead to un-intuitive results, such as when the physical volume of unprocessed records increases, but the percentage of records processed increases as well since the total collection is growing. Thus an "improving" percentage figure can at times also represent a growing backlog of unprocessed records.

Another challenge for NARA, given society's growing expectation for easy and near-immediate access to information online, will be to provide such access to records created digitally ("born digital") and to identify those textual records most in demand so they can be digitized and made available electronically. The ERA's diminished access capabilities compound this challenge (see Challenge #1 above). Another access issue is the lack of mobile interfaces for smartphones, tablets, and similar devices for any NARA website. Finally, NARA's role in ensuring the timeliness and integrity of the declassification process of classified material held at NARA is also vital to public access.

NARA's FY 2014–2018 Strategic Plan establishes public access as NARA's core purpose, with the goal to "Make Access Happen." In the Plan NARA also identified an initiative to digitize all analog archival records to make them available online. However, over the past six years, NARA has established similar digitization goals without putting in place the necessary management and strategic direction to achieve consistent, measureable results. Therefore, in order for NARA to meet its self-described "core purpose," NARA must ensure the appropriate management, strategy, and resources are in place to achieve its access and digitization goals.

5. Meeting Storage Needs of Growing Quantities of Records

NARA-promulgated regulation 36 CFR Part 1228, "Disposition of Federal Records," Subpart K, "Facility Standards for Records Storage Facilities," requires all facilities housing Federal records to meet defined physical and environmental requirements by FY 2009. NARA's challenge is to ensure NARA's own facilities, as well as those used by other Federal agencies, are in compliance with these regulations; and to effectively mitigate risks to records which are stored in facilities not meeting these standards. NARA is also challenged in acquiring needed space for incoming textual records while trying to comply with OMB Memorandum No. 2013-02

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requiring Federal agencies not increase the square footage of their domestic office and warehouse inventory.

In addition to NARA's physical storage needs, the agency is also challenged in meeting its requirements for electronic data storage. NARA's in-house data storage is reaching capacity, impacting the agency's digitization efforts and other IT programs dependent on scalable, secure, and readily available data storage. Increasing amounts of electronic data storage is necessary for NARA to meet its mission. Without adequate storage NARA cannot continue accepting, storing, and processing records, or make electronic records available to the public. NARA is challenged to develop an enterprise-wide data storage management solution compliant with the Office of Management and Budget's Federal Data Center Consolidation Initiative, which focuses on reducing the energy and real estate footprint of government data centers.

6. Preservation Needs of Records

Preservation continues to be a material weakness for the agency. NARA holdings grow older daily and face degradation associated with time. This affects both traditional paper records and the physical media that electronic records and audiovisual records are stored on. Per management, preservation resources have not been able to adequately address the growth in holdings needing preservation action. Preserving and providing access to records is a fundamental element of NARA's duties to the country, and NARA cannot provide access to records unless it can preserve them for as long as needed. The backlog of records needing preservation remains steady. NARA is challenged to address this backlog and future preservation needs, including the data integrity of electronic records. Further, NARA's primary tool for preserving electronic records, the ERA system, has not delivered the functionality necessary to address record format obsolescence (see OIG Challenge #1). The challenge of ensuring NARA facilities meet environmental standards for preserving records (see OIG Challenge #5) also plays a critical role in the preservation of Federal records.

7. Improving Project Management

Effective project management, particularly for IT projects, is essential to obtaining the right equipment and systems to accomplish NARA's mission. Complex and high-dollar contracts require multiple program managers, often with varying types of expertise. NARA is challenged with planning projects, developing adequately defined requirements, analyzing and testing to support acquisition and deployment of the systems, and providing oversight to ensure effective or efficient results within costs. Currently, IT systems are not always developed in accordance with established NARA guidelines. These projects must be better managed and tracked to ensure budget, scheduling, and performance goals are met.

As an example, GAO reported NARA did not document the results of briefings to its senior management oversight group during the development of NARA's largest IT project, the ERA program. There is little evidence the group identified or took appropriate corrective actions, or ensured such actions were taken and tracked to closure. Without adequate oversight evaluating project progress, including documenting feedback and action items from senior management, NARA will not be able to ensure projects are implemented at acceptable cost and within reasonable time frames. GAO also reports NARA has been inconsistent in its use of earned

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value management (EVM), a project management approach providing objective reports of project status and early warning signs of cost and schedule overruns. Inconsistent use of key project management disciplines like EVM limits NARA's ability to effectively manage projects and accurately report on their progress.

8. Physical and Holdings Security

Holdings Security continues to be a material weakness for the agency. Document and artifact theft is not a theoretical threat; it is a reality NARA has been subjected to time and time again. NARA must maintain adequate levels of security to ensure the safety and integrity of persons and holdings within our facilities. This is especially critical in light of the security realities facing this nation and the risk our holdings may be pilfered, defaced, or destroyed by fire or other man-made and natural disasters. Not only do NARA's holdings have immense historical and financial value, but we hold troves of national security information as well. NARA's implementation of the Holdings Protection Team and stricter access controls within the past five years has increased NARA's security posture. However, without adequate oversight and accountability, NARA continues to be challenged in implementing an effective Holdings Protection Program.

9. Contract Management and Administration

The GAO has identified Commercial Services Management (CSM) as a government-wide initiative. The CSM initiative includes enhancing the acquisition workforce, increasing competition, improving contract administration skills, improving the quality of acquisition management reviews, and strengthening contractor ethics requirements. Effective contract management is essential to obtaining the right goods and services at a competitive price to accomplish NARA's mission. NARA is challenged to continue strengthening the acquisition workforce and to improve the management and oversight of Federal contractors. NARA is also challenged with reviewing contract methods, to ensure a variety of procurement techniques are properly used in accordance with laws, regulations, and best practices.

10. Management of Internal Controls

OMB Circular A-123, *Management's Responsibility for Internal Control*, explains management is responsible for establishing and maintaining internal control to achieve the objectives of effective and efficient operations, reliable financial reporting, and compliance with applicable laws and regulations. GAO has reported NARA has not established an enterprise risk management capability, thus reducing its ability to anticipate future challenges and avoid potential crises. Currently, the agency has not established an effective internal control program, and OIG audit recommendations from as far back as FY 2009 concerning an internal control program have yet to be implemented. Thus, NARA is vulnerable to risks that may not be foreseen or mitigated, and does not have the ability to self-identify and appropriately manage or mitigate significant deficiencies. Establishment of an effective internal control program is critical as it provides several benefits, including (1) improved decision making, (2) risk identification, management, and mitigation, (3) opportunities for process improvement, (4) effective use of budgeted resources, and (5) strategic planning. NARA's challenge is to ensure the agency is in compliance with OMB Circular A-123; and to develop and fully implement an internal control program.

REPORTING REQUIREMENTS

MANDATED BY THE INSPECTOR GENERAL ACT OF 1978, AS AMENDED, AND OTHER LAWS

<u>REQUIREMENT</u>	<u>SUBJECT</u>	<u>PAGE(S)</u>
Section 4(a)(2)	Review of legislation and regulations	4, 7
Section 5(a)(1)	Significant problems, abuses, and deficiencies	2–3, 11–14, 23–29
Section 5(a)(2)	Significant recommendations for corrective action	2–3, 11–14
Section 5(a)(3)	Prior significant recommendations unimplemented	35–49
Section 5(a)(4)	Summary of prosecutorial referrals	32
Section 5(a)(5)	Information or assistance refused	33
Section 5(a)(6)	List of reports issued	32
Section 5(a)(7)	Summaries of significant reports	2–3, 11–14
Section 5(a)(8)	Audit Reports—Questioned costs	33
Section 5(a)(9)	Audits Reports—Funds put to better use	34
Section 5(a)(10)	Prior audit reports with no management decision	33
Section 5(a)(11)	Significant revised management decisions	33
Section 5(a)(12)	Significant management decisions with which the OIG disagreed	23–24
Section 5(a)(14)	Reporting on OIG peer review	8
P.L. 110-181	Annex of completed contract audit reports	34
P.L. 104-106	Prior fiscal years’ open audit recommendations	35–49

REPORTING REQUIREMENTS

STATISTICAL SUMMARY OF INVESTIGATIONS

<i>Investigative Workload</i>	
Hotline contacts received this reporting period	54
Complaints opened this reporting period	19
Investigations pending at beginning of reporting period	20
Investigations opened this reporting period	5
Investigations closed this reporting period	9
Investigations carried forward this reporting period	16
<i>Categories of Closed Investigations</i>	
Fraud	2
Conflict of Interest	0
Contracting Irregularities	1
Misconduct	1
Larceny (theft)	1
Other	4
<i>Investigative Results</i>	
Cases referred – accepted for prosecution	1
Cases referred – declined for prosecution	0
Cases referred – pending prosecution decision	0
Arrest	2
Indictments and informations	2
Convictions	0
Fines, restitutions, judgments, and other civil and administrative recoveries	\$0
NARA holdings recovered	205
<i>Administrative Remedies</i>	
Employee(s) terminated	0
Employee(s) resigned	1
Employee(s) suspended	0
Employee(s) given letter of reprimand or warnings/counseled	0
Employee(s) taking a reduction in grade in lieu of administrative action	0
Contractor (s) removed	0
Individual(s) barred from NARA facilities	2

REPORTING REQUIREMENTS

SUMMARY OF PROSECUTORIAL REFERRALS Requirement 5(a)(4)

Accepted for Prosecution

Recovery of Holdings From Another Federal Archives

ART assisted in a joint investigation with the Naval Criminal Investigative Service in executing a search warrant at the home of a former volunteer with the Navy's archives, resulting in the recovery of 35 boxes of historical Federal records and the arrest of the subject on Federal theft charges. The joint investigation remains ongoing.

Declined for Prosecution

None.

Pending Prosecutorial Determination

None.

LIST OF AUDIT REPORTS ISSUED Requirement 5(a)(6)

Report No.	Title	Date	Questioned Costs	Unsupported Costs	Funds Put to Better Use
14-08	Audit of NARA's Capital Planning and Investment Control (CPIC) Process	04/17/2014	\$0	\$0	\$0
14-09	Audit of Conference-Related Activities and Expenses	05/01/2014	\$0	\$0	\$193,942
14-10	Cotton & Company's Audit of NARA's Enterprise Wireless Access	05/15/2014	\$0	\$0	\$0
14-11	Audit of Special Telework Arrangements at NARA	03/11/2014	\$0	\$0	\$63,408
14-12	Audit of Selected Aspects of NARA's Digitization Program	07/03/2014	\$0	\$0	\$0
14-13	Audit of NARA's Compliance with the Improper Payment Elimination and Recovery Act of 2010	04/17/2014	0	0	0
14-14	Status Update of the Electronic Records Archives Executive Office of the President Data Migration Project	05/28/2014	0	0	\$350,000

REPORTING REQUIREMENTS

AUDIT REPORTS WITH QUESTIONED COSTS Requirement 5(a)(8)

Category	Number of Reports	DOLLAR VALUE	
		Questioned Costs	Unsupported Costs
A. For which no management decision has been made by the commencement of the reporting period	0	\$0	\$0
B. Which were issued during the reporting period	0	\$0	\$0
Subtotals (A + B)	0	\$0	\$0
C. For which a management decision has been made during the reporting period	0	\$0	\$0
(i) dollar value of disallowed cost	0	\$0	\$0
(ii) dollar value of costs not disallowed	0	\$0	\$0
D. For which no management decision has been made by the end of the reporting period	0	\$0	\$0
E. For which no management decision was made within 6 months	0	\$0	\$0

OTHER REQUIRED REPORTS

REQUIREMENT	CATEGORY	SUMMARY
5(a)(3)	Prior significant recommendations unimplemented	See pages 35–50.
5(a)(5)	Information or assistance refused	None
5(a)(10)	Prior audit reports with no management decision	Management has concurred or disagreed with all issued reports.
5(a)(11)	Significant revised management decisions	None
5(a)(12)	Significant management decisions with which the OIG disagreed	See pages 23–24.

REPORTING REQUIREMENTS

AUDIT REPORTS WITH RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE Requirement 5(a)(9)

CATEGORY	NUMBER	DOLLAR VALUE
A. For which no management decision has been made by the commencement of the reporting period	5	\$17,632,374
B. Which were issued during the reporting period	3	\$607,350
Subtotals (A + B)	8	\$18,239,724
C. For which a management decision has been made during the reporting period	0	\$0
(i) dollar value of recommendations that were agreed to by management	0	\$0
Based on proposed management action	0	\$0
Based on proposed legislative action	0	\$0
(ii) dollar value of recommendations that were not agreed to by management	0	\$0
D. For which no management decision has been made by the end of the reporting period	8	\$18,239,724
E. For which no management decision was made within 6 months of issuance	5	\$17,632,374

ANNEX ON COMPLETED CONTRACT AUDIT REPORTS

Section 845 of the 2008 Defense Authorization Act, Public Law 110-181, requires certain information on completed contract audit reports containing significant audit findings be included as an annex to this report. While the OIG audited the ERA and other contracts during this period, they were generally program audits as opposed to contract audits.

REPORTING REQUIREMENTS

Prior Fiscal Years' Open Audit Recommendations⁴

<u>Report</u>	<u>Title</u>	<u>Recommendation</u>
06-09	Review of NARA's Information Security Program	<p>2a The Assistant Archivist NH should document policies and procedures for ensuring that software products running on NARANET are current versions, still supported by the software vendors.</p> <p>2c The Assistant Archivist should immediately begin planning for the migration from Novell Netware to another type of operating system software, e.g., Microsoft or Linux.</p>
06-10	Evaluation of NARA's Affiliated Archives Program	<p>3 The Archivist should take appropriate measures to revise MOUs between NARA and affiliates to incorporate current standards for housing NARA records.</p> <p>4 The Archivist should ensure that there is a mechanism to update the MOUs. Specifically, a procedure should be established to update the MOUs on an interim basis, or when new standards are implemented at NARA.</p> <p>5 The Archivist should ensure that all MOUs contain the required clause for the use of the NARA seal.</p> <p>6 The Archivist should ensure that all affiliates meet the current storage standards or provide waivers and time frames to have the affiliates become compliant with the NARA 1571 standards.</p>
06-11	Audit of System Adm. Rights and Controls	<p>5 Ensure that Access Control lists are produced for all IT systems and used as a basis for access validation.</p>
07-10	Review of Selected Security Aspects of NARA's Computer Network Environment	<p>1a Direct the CISO to perform a more comprehensive survey of computer network devices, to identify any other unauthorized devices not identified by the earlier survey conducted in response to RFC 1120.</p> <p>1b When the recommended survey is completed, direct the FOSAs to immediately remove any unauthorized devices connected to the commuter network.</p> <p>1d Require NARANet system administrators to periodically scan the network using automated software tools to ensure that only approved devices are connected to the network.</p>
08-01	Audit of NARA Artifacts	<p>1b The Assistant Archivist for Presidential Libraries (NL) should ensure that the results of the completed physical inventory are transmitted to NL and appropriately secured to serve as control or master copies establishing a reliable baseline for each library's museum collection.</p> <p>1d The Assistant Archivist for Presidential Libraries (NL) should ensure that once an initial physical inventory has been completed, non-HVOs are reinventoried/verified in a timelier manner than the current 5% or 1,000 items annually.</p> <p>2c The Assistant Archivist for Presidential Libraries should ensure that policy and standards are developed for linking digital images of items to their record in i/O, giving priority to photographing HVOs and outgoing loan items.</p>
08-02	Audit of NARA's Purchase Card Program	<p>13 The Assistant Archivist of Administration should direct the Director NAA to establish written policies and procedures to evaluate the effectiveness of cardholder reconciliations and approving officials' certifying duties.</p>

⁴The OIG is currently reviewing documentation submitted by NARA for multiple recommendations listed in this section in order to determine whether the recommendations can be closed.

REPORTING REQUIREMENTS

08-04 HMS Review

- 4a The CIO should ensure that employees with responsibilities for conducting project analysis receive additional training for investment analysis regarding requirements, alternatives, and costs/benefits.

08-05 FY 07 FISMA Review

- 12 The Assistant Archivist for Information Services should develop and implement management controls to monitor and enforce compliance with NIST SP 800-37 and NARA C&A policy.
- 14 The Assistant Archivist for Information Services should develop and implement a mechanism to monitor system accreditations for NARA's National Security Systems to ensure the systems are re-certified and accredited at least every three years.
- 15b The Archivist along with NARA Senior Management and Information Owners should develop recovery strategies for at least those systems identified as critical based on the outcome of the Business Impact Analysis.
- 16b The Assistant Archivist for Information Services should implement management controls to verify contingency plans are reviewed and updated at least annually as required by NIST SP 800-34
- 16c The Assistant Archivist for Information Services should update the contingency plans, if needed, and record any changes made in the Record of Changes section of the plans.
- 17 The Assistant Archivist for Information Services, along with the system owners, should develop tests of the system contingency plans to evaluate the viability of the plan procedures and determine the ability of recovery staff to implement the recovery strategy identified.
- 18 The Assistant Archivist for Information Services should develop a plan of action and milestone process that provides visibility over all IT security weaknesses and issue written procedures regarding that process.
- 19 The Assistant Archivist for Information Services should develop a process to identify employees with significant security responsibilities.
- 2 The Assistant Archivist for Information Services should establish a process to review the Remedy trouble ticket work logs daily and communicate with the CIRT team, if needed, to ensure all events are fully investigated.
- 20 The Assistant Archivist for Information Services should require all individuals with significant security responsibilities, including contractor employees, to complete training based on the risk provided by their activities and develop a process to monitor compliance.
- 6 The Assistant Archivist for Information Services should conduct a review of open Remedy tickets and direct the contractor, in writing, to address the vulnerabilities identified during the completed server audits.
- 7 The Assistant Archivist for Information Services should add security vulnerabilities identified during the server audits to the system's plan of action and milestones to ensure proper tracking and visibility.
- 8 The Assistant Archivist for Information Services should conduct "lessons learned" meetings in accordance with the guidance in NIST SP 800-61 when a major incident occurs and periodically for lesser incidents, and develop and implement a control mechanism to verify compliance.

08-07 Audit of the Researcher ID Card Program

- 1 Evaluate the enhanced security and customer service benefits that would accrue to NARA and consider implementing an automated integrated researcher registration system at all NARA facilities with research rooms.
- 3 Require periodic monitoring of the Archives I and Archives II database. A log recording the date of the review and corrective action taken should be maintained.

REPORTING REQUIREMENTS

09-01 Audit of the Controls Over Presidential Library Textual Records

- 1b The Assistant Archivist for Presidential Libraries should ensure all libraries, in accordance with NARA 1572, nominate selected staff for background checks required to access vaults or other specially protected areas (and submit the list to NASS).
- 1c The Assistant Archivist for Presidential Libraries should ensure all libraries, in accordance with NARA 1572, report storage methods and exact container locations to NASS.
- 1d The Assistant Archivist for Presidential Libraries should ensure all libraries, in accordance with NARA 1572, report the names of staff with access to specially protected records to NASS.
- 1e The Assistant Archivist for Presidential Libraries should ensure all libraries, in accordance with NARA 1572, maintain inventories of SPRs.
- 3 The Assistant Archivist for Administrative Services should ensure that the Security Management Branch conduct reviews and initial certifications of SPR storage areas in a timely manner. Criteria for the evaluation of SPR storage areas should be clearly articulated and the method by which the evaluations will occur (if other than inspection) should be documented. A provision should also be made ensuring results are clearly documented and transmitted to the library, including any recommended remedial action.

09-04 NR Compliance with Controls for Safeguarding Specially Protected Records

- 2 The Assistant Archivist for Administration should ensure the Security Management Branch (NASS) initially certifies designated SPR storage areas. If this cannot be done via on-site inspection because of time or budget constraints it should be done remotely through the exchange of information necessary to allow NASS to either certify the specially protected storage areas or communicate changes necessary to bring such holding areas into NARA 1572 compliance.
- 3 The Assistant Archivist for Regional Records Services should ensure regional archives are in compliance with the revised procedures and defined requirements resulting from recommendation 1. Specifically, they should meet the requirements for (a) nominating selected staff with access to specially protected holdings for background checks and (b) provide storage methods and container locations to NASS.

09-05 Audit of NARA's IPv6 Compliance

- 1 The Assistant Archivist for Information Services/CIO should ensure testing required by OMB and outlined in the Federal CIO Council Architecture and Infrastructure Committee "Demonstration Plan to Support Agency IPv6 Compliance," version 1.0 on NARA's operational core network is performed and the test results required by the CIO Council to demonstrate compliance are documented or obtain a written waiver from OMB.
- 3 The Assistant Archivist for Information Services/CIO should ensure employees responsible for planning, implementing, maintaining, and securing an IPv6 network for NARA receive appropriate IPv6 training

09-14 Audit of NARA's FY 2008 Management Control Program

- 1c The NARA management control liaison should work with the offices and office management control liaisons to review, and revise as necessary, the critical functions contained in the management control plans. The revision to these plans should seek to identify and rank risks to major program and functional areas and undertake internal control reviews of major risk areas.
- 4 The Assistant Archivist for Regional Records Services should ensure all program findings, regardless of whether they are considered major or minor, are tracked to resolution and supported by adequate documentation.

09-15 Audit of NARA's Work at Home System

- 7 We recommend the CIO ensures that the WAHS meets OMB and NIST requirements prior to full implementation.

REPORTING REQUIREMENTS

09-16 Audit of Processing and Safeguarding Veterans Requests

- 1 The Assistant Archivist for Regional Records Services should direct the Director, NPRC, to export data for the "record of disclosure file" and follow the approved Records Disposition Schedule and limit the amount of record requests stored online.
- 11 The Assistant Archivist for Regional Records Services should review these vulnerabilities and determine whether action is needed.
- 2 The Assistant Archivist for Regional Records Services should direct the Director, NPRC, to establish and enforce password requirements within CMRS that are appropriate based on the sensitivity of the information contained in the system and the need to protect the integrity of the information.
- 3 The Assistant Archivist for Regional Records Services should direct the Director, NPRC, to establish controls to restrict users to only those rights and views needed to perform their job.
- 5 The Assistant Archivist for Regional Records Services should direct the Director, NPRC, to limit users' ability to perform extracts of the database containing sensitive information or remove access to CD burners and thumb drives.
- 6 This audit recommendation contains information concerning an ongoing weakness which could be used to compromise veterans' information; or to exploit NARA programs, operations, and systems if made public. Contact the OIG if you need more information.
- 7 The Assistant Archivist for Information Services should encrypt backup tapes containing PII as required by OMB Memorandum 06-16.

10-04 Audit of NARA's Oversight of Electronic Records Management in the Federal Government

- 2 The Archivist should consider using the authority given under title 44 of the US Code to direct Federal agencies to perform assessments of their electronic records management programs based on requirements contained in 36 CFR Part 1236.
- 3 The Archivist should ensure NARA establishes a strategy for consistently and systematically monitoring compliance with electronic records regulations and guidance throughout the Federal Government.
- 4 The Assistant Archivist for Records Services, Washington DC (NW) should ensure NARA's strategy for monitoring and evaluating Federal agency compliance with electronic records management regulations and guidance results in adequate identification and mitigation of risks to permanent electronic records.
- 5 The Assistant Archivist for Records Services, Washington DC (NW) should ensure development of controls to adequately monitor agency scheduling of electronic records in an effort to reasonably ensure electronic records/systems are scheduled in timely manner, and therefore provide a reasonably accurate reflection of the universe.
- 6 The Assistant Archivist for Records Services, Washington DC (NW) should ensure a methodology for verifying the accuracy/completeness of Federal agency responses to electronic records scheduling requirements resulting from the E-Government Act of 2002.
- 7 The Assistant Archivist for Records Services, Washington DC (NW) should ensure development and application of a methodology for adequately identifying gaps in electronic record accessions. This methodology should reasonably ensure permanent electronic records are identified, scheduled, and ultimately obtained by NARA.

10-05 Audit of NARA's Contract for IT and Telecommunications Support Services

- 2 The Director, Acquisitions Services Division (NAA) should, for future procurements involving a T&M contract, ensure that contracting personnel comply with the FAR requirement that a "Determination and Findings" be prepared.

REPORTING REQUIREMENTS

- 3b The Director, Technical Services Division (NHT), in conjunction with the Contracting Officer for the Capstone Task Order, should prepare a surveillance plan that supplements the requirements of the Quality Assurance Surveillance Plan prepared for the task order.

10-07 Audit of NARA's Network Infrastructure

- 14 The Archivist should direct the Assistant Archivist for Information Services, Assistant Archivist for Regional Records Services, and the Assistant Archivist for Presidential Libraries to coordinate with the Assistant Archivist for Administration to develop a mechanism to track access reviews and key inventories for computer rooms and other locations where IT network infrastructure equipment is stored at the field sites.
- 15 The Assistant Archivist for Information Services in conjunction with the Assistant Archivist for Regional Records Services and the Assistant Archivist for Presidential Libraries should periodically monitor the network environments at the field sites to ensure network equipment and cables stored outside the computer rooms are protected.
- 16 The Assistant Archivist for Information Services in conjunction with the Assistant Archivist for Regional Records Services and the Assistant Archivist for Presidential Libraries should conduct a review to determine which facilities require racks and provide the necessary racks.
- 17 The Assistant Archivist for Information Services in conjunction with the Assistant Archivist for Regional Records Services and the Assistant Archivist for Presidential Libraries should perform a risk assessment for each of the field offices to determine whether changes to the buildings are needed in order to properly protect network equipment.
- 5 The CIO should create a firewall policy to establish rules for inbound and outbound traffic and how the firewall will be managed and updated.

10-14 Audit of the Process for Providing and Accounting for Information Provided to Researchers

- 1 The Assistant Archivist for NW should establish formal written policies and procedures to improve NW monitoring of the pull and refile process.
- 2 The Assistant Archivist for NW should implement a centralized database for all of the NW divisions involved in the processing of researchers' requests for records and determine the necessary information that should be included in the database.

10-19 Audit of NARA's Management Control Program for FY 2009

- 1c The Archivist should consider establishing a Senior Management Council to provide oversight and additional accountability for the Internal Control Program.
- 2 The Archivist, the Assistant Archivist for NA, and the Director of NPOL should ensure recommendations from OIG Report 09-14 are implemented and previously identified weaknesses are corrected.

11-02 Network and Penetration Testing Oversight

- 1 NARA management should apply the appropriate hot fix referenced in the vendor advisory on the affected machines.
- 2a This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 2b This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 2c This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 2d This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 3a This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.

REPORTING REQUIREMENTS

- 3b This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 3c This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 3d This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 3e This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 6a NARA management should immediately address corrective action for all vulnerabilities identified as "high" and "critical" risk.
- 6b NARA Management should evaluate the identified risks and corrective actions to address those identified as "medium" and "low" risk vulnerabilities.

11-05 Audit of Archives I & II Guard Service Contract

- 6 The Assistant Archivist for Administration should develop a new fitness standard to test the physical fitness of the security officers that more closely resembles the requirements of the contract.

11-06 Audit of the NARANET Server Upgrade Project

- 1 The CIO should continue to closely monitor the NARANET Server Upgrade project to ensure implementation deadlines are met and risks are minimized.
- 4 The CIO should ensure alternatives are fully considered and analysis documented when planning and executing the next NARANET upgrade.
- 7 The CIO should assign responsibility to ensure the total costs and costs spent to date are accurate on the Monthly Status Reports and add an independent verification process to the Control Phase to verify cost figures.

11-14 Audit of NARA's Foreign and Premium Travel

- 2a Develop and implement a mandatory specialized training course for travelers and authorizing officials reiterating their roles and responsibilities. Refresher courses should be provided on a periodic basis.
- 2d Develop and implement procedures to follow up on travel vouchers not submitted within five working days. Take appropriate action for people who do not comply within five working days.
- 3 Create a webpage within NARA@work which includes all travel information including but not limited to links to the FTR, NARA 601, the travel card application and agreement, and NABF contacts.
- 6a Review and update policy and procedures for issuing travel cards to employees. Include additional restrictions as outlined in OMB Circular A-123 on cardholders with credit scores less than 660.
- 6b Enhance procedures to perform timely periodic reviews of the appropriateness of individually and centrally billed travel cards to help ensure the effectiveness of travel card expenditures controls. Specifically, as outlined in OMB Circular A-123 review ATM cash withdrawals for reasonableness and association with official travel.

11-15 Audit of NARA's Drug Testing Program

- 2 Amend NARA TDPs to ensure compliance with the SAMHSA's Interagency Coordinating Group Executive Committee Guidelines for the Selection of Testing Designated Positions and establish a mechanism to periodically review and update TDPs as necessary.
- 3 Develop a training course for all supervisors that will aid them in recognizing and addressing illegal drug use by agency employees. This training should be mandatory for all supervisors. Also evaluate the current drug awareness training for employees.
- 4 Develop a retention plan for all drug testing related documentation consistent with the guidance issued by SAMHSA.

REPORTING REQUIREMENTS

- 5 Review NARA's Drug Free Workplace Plan and update it as necessary. In addition, a plan for periodic reviews and updates of the plan document should be developed.

11-20 Audit of NARA's Telework Program

- 1d Develop a method and common criteria for tracking telework participation.
- 3a The Executive for Information Systems, CIO, and Executive for Business Support Services should ensure all deferred and failed security tests have been reassessed and the results documented.
- 3d Monitor compliance with HSPD-12 to ensure established deadlines are met.
- 3e Review Citrix security configurations for adequacy.
- 3g Develop a plan with General Counsel to protect PII and NARA proprietary information from being distributed or compromised over the network and email system.

12-02 Audit of the Management of Records at the Washington National Records Center

- 11a This audit recommendation contains information concerning security deficiencies in NARA's handling of national security classified materials, and has not yet been made publicly available.
- 11b This audit recommendation contains information concerning security deficiencies in NARA's handling of national security classified materials, and has not yet been made publicly available.
- 12b This audit recommendation contains information concerning security deficiencies in NARA's handling of national security classified materials, and has not yet been made publicly available.
- 11c This audit recommendation contains information concerning security deficiencies in NARA's handling of national security classified materials, and has not yet been made publicly available.
- 11d This audit recommendation contains information concerning security deficiencies in NARA's handling of national security classified materials, and has not yet been made publicly available.
- 14b This audit recommendation contains information concerning security deficiencies in NARA's handling of national security classified materials, and has not yet been made publicly available.

12-05 Audit of the management of Records at the Washington National Records Center

- 10 The Executive of Agency Services should ensure a plan is developed to help all agencies transition to fully using all of the features available in ARCIS's Customer Portal.
- 11 The Executive of Agency Services should ensure explicit requirements are communicated to agencies on how boxes should be transferred to FRCs. When boxes do not meet these requirements FRCs should correct the problems and enforce the policy of billing agencies for the additional costs to correct the problems.
- 12a Procedures for all WNRC processes are documented. Review existing procedures and update as necessary.
- 12b Procedures between unclassified and classified processes are consistent where possible.
- 2 The Executive of Agency Services should ensure a formal tracking mechanism is implemented for new records received but stored in the hallways due to lack of shelving space.
- 3a A Problem Resolution Process is created for all problems, regardless of whether they are considered major or minor. All problems should be tracked to resolution and supported by adequate documentation.
- 3b A mechanism to facilitate the problem tracking and resolution process is implemented.
- 4b The Executive of Agency Services should ensure records already approved for disposal are destroyed.
- 4c The Executive of Agency Services should ensure the disposal review process is streamlined.

REPORTING REQUIREMENTS

- 5 The Executive of Agency Services should ensure a process to perform periodic inventories of the records held at WNRC is documented and implemented. This process should be systematic and repeatable.
- 6b A detail review of the record storage areas is performed to assess the conditions of records stored at WNRC. Problems identified should be corrected.
- 6c Employees are reminded of the importance of safeguarding records, including what to do when boxes deteriorate or no longer support the stored contents.
- 7 The Executive of Agency Services should ensure accounts for separated or terminated employees are terminated in a timely manner. Also quarterly reviews of access to ARCIS should be performed to identify whether user accounts access is appropriate.
- 8 The Executive of Agency Services should ensure management designs and implements monitoring activities for records processed at WNRC including weekly, monthly, and quarterly reports.
- 9a The Executive of Agency Services should ensure appropriate training is provided to Vault personnel on the Classified SOP.
- 9c A monitoring process is implemented for ensuring classified operations are performed as written in the Classified SOP.
- 9d The Classified SOP is reviewed on an annual basis and updated when necessary.

12-09 Audit of NARA's Data Center Consolidation Initiative

- 1a The CIO should update the Master System List and/or the Enterprise Architecture to incorporate NARA's data center consolidation goals, including the approach, rationale, and a preliminary timeline of activities.
- 1b The CIO should update the Master System List and/or Enterprise Architecture to incorporate energy usage calculations.
- 1c The CIO should update the Master System List and/or the Enterprise Architecture to incorporate realistic estimates of funding needed or savings to be realized from implementing NARA's data center consolidation goals.
- 1d The CIO should update the Master System List and/or the Enterprise Architecture to incorporate annual savings metrics such as rack count reduction, server count reduction, energy usage reduction, and energy cost reduction to monitor progress.
- 2 The CIO should update transition plans within the Enterprise Architecture annually to outline the year-by-year evolution of NARA's applications and supporting IT infrastructure in the context of OMB's guidance on cloud-first deployment and consolidation.
- 3 The CIO should conduct the consolidation/virtualization analysis to investigate the impact of consolidating or virtualizing two major application domains (NISP and ERA) and the General Support System (NARANET) as planned, or evaluate other alternatives to increase the average server utilization rate.
- 4 The Executive for Business Support Services should evaluate the current organization of rack space and determine whether servers can be consolidated into fewer racks when considering space optimization, power consumption, operations management, and component failure/recovery perspectives.
- 5 The CIO should review and approve the annual Enterprise Architecture update to ensure that the agency is considering OMB's cloud-first policy and guidance on virtualization and consolidation.

12-10 Follow up Audit of Artifacts

- 1a The remaining five libraries complete baseline inventories as expeditiously as possible with master copies forwarded to LP.
- 1b The remaining five libraries performing baseline inventories complete legacy reconciliation to identify discrepancies as expeditiously as possible and all libraries with identified discrepancies take action to resolve the discrepancies.

REPORTING REQUIREMENTS

- 1d The time-lapse between inventory cycles is completed in a timelier manner than the current guide of seven to ten years for libraries with larger collections, or an analysis has been completed to indicate that the current guidance is appropriate.
- 1e Interim steps are developed to document and monitor deleted records from the current collections database system or a replacement database is implemented.
- 1f Photographs of all valuable and vulnerable (V/V) artifacts and artifacts on loan are completed, and all libraries establish plans to photograph their remaining collection.
- 1h Appropriate storage hardware for the Reagan Library is procured and installed.
- 2a Develop and identify an appropriate staffing plan for museum operations. The plan should 1) align with collection sizes and life cycles, (2) include temporary staff other staffing alternatives to support collection inventories and other core collection work, and (3) identify the planned inclusive time periods devoted to the collection inventory.
- 2b Review and revise current time-guidance policy, as appropriate, for baseline inventories for newly established Presidential Libraries.
- 4 Develop management controls to minimize the risks associated with a lack of separation of duty over the safeguarding of Presidential artifacts.
- 5a Clarify policy concerning what should be classified as a V/V artifact. An appropriate lists needs to be developed to ensure those artifacts requiring additional stewardship measures are included.
- 5b Develop documentation guidelines that identify the importance of supporting the conclusion reported on the annual V/V reports. When counting objects, the support documentation should show the same count.
- 5c Develop an annual V/V report format the prompts the preparer of the report to include the requested data.
- 6a Separation of duty policies are developed and efforts to minimize the possible unauthorized removal of Presidential gifts from courtesy storage with compensating controls.
- 6b Reconciliation procedures between the completed inventories and White House legacy documentations for both Bush 43 and Obama administrations as a compensating management control until the separation for duties issue at LM is mitigated.
- 6c Policy is developed for a security escort when picking up HVO gifts from the White House for courtesy storage at NARA.
- 7a Policies and procedures are clarified and reiterated to library personnel concerning 1) sequestration of museum artifacts from library personnel other than museum personnel, 2) procedures to periodically review access logs and security camera tapes.
- 7b Policies and procedures for artifacts on long-term loan are re-iterated and disseminated concerning 1) the annual update of loan agreements and 2) requirements for long-term loans including photo requirements. LP should establish time caps on loans or periodically request temporary return of items for condition assessments.
- 7c Reiterate NARA policy to adequately backup inventory-related collection documentation.
- 8a Update comprehensive set of museum collection management policies and procedures and ensure their development.
- 8b Establish procedures to periodically review and, if necessary, revise said policies and procedures.

12-11 NARA's Network Assessment Audit

- 1 This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
- 10 This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.
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REPORTING REQUIREMENTS

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12-12 Audit of NARA's Parking Program

- 1a Establish a deadline to have the LPR system operational and able to read license plates at an acceptable read accuracy percentage at A2's three entrances before acceptance of the system. If the LPR system cannot be made operational and cannot read license plates at an acceptable read accuracy percentage at AII's three entrances by this deadline then NARA needs to implement a new strategy to control parking at AII that reduces its reliance on the LPR system.

12-14 Audit of OGIS

- 2 Director of OGIS should, through the budget process, define the resources necessary to better accomplish the statutory requirements of the office. If NARA budget staffing limitations and competing priorities negate NARA's abilities to fund the requirements of OGIS, we recommend this condition be reported to the appropriate external stakeholders.

12-15 Audit of NARA's Classified Systems

- 1 The Executive for Information Services/CIO, in coordination with the Chief Operating Officer, should ensure all classified system authorization packages are updated in accordance with NARA policy.
- 2 The Executive for Information Services/CIO, in coordination with the Chief Operating Officer, should establish a timeframe for review and approval of authorization documents.
- 3 The Executive for Information Services/CIO, in coordination with the Chief Operating Officer, should develop a continuous monitoring strategy for classified systems requiring system owners on at least a quarterly basis to assess security controls and inform authorizing officials when changes occur that may impact the security of the system.
- 4 The Executive for Information Services/CIO, in coordination with the Chief Operating Officer, should obtain authorizations to operate for each of the classified systems or disallow them in accordance with NARA and Federal policy.
- 8 The Executive for Information Services/CIO, in coordination with the Chief Operating Officer, should ensure all contingency plans are updated, completed, reviewed, and tested in accordance with NARA policy.

12-17 Audit of NARA's Public Transit Subsidy Program

- 3 Require employees to affix a copy of the applicable state or local transit authority online trip planner or other documentation supporting their commuting expenses to their application for transit benefits.

13-01 Audit of NARA's Internal Controls Program for FY 2010

- 1a The MCOC becomes more involved in the decision-making and implementation plan for the ICP. Additionally, periodic reports must be presented to the MCOC to review the progress of the ICP.
- 1d Resources are employed to develop and implement the ICP including, but not limited to, a Chief Risk Officer, additional employees or contractors, and the purchase of appropriate ICP software.

REPORTING REQUIREMENTS

- 1e Risk management responsibilities are included in the performance plans for program and function owners.
- 1f Prior recommendations from previous OIG and GAO reports are closed.
- 1g A Risk Management Policy is created to communicate NARA's commitment to enterprise risk management.
- 1i A training plan is developed that encompasses educating the agency on risks and internal control. Additional training is provided to all individuals responsible for executing the ICP, including program owners function owners, and MCOC members.

13-03 Audit of ERA Preservation Efforts

- 1 The CIO should ensure the ERA Program Manager follows NARA 805 SDLC Handbook and System Development Guidelines for any enhancements or modifications to ERA including the Requirements Definition Activity and Requirement Review Process.
- 2 The CIO should establish a test environment for ERA that is representative of the production environment and use this test environment to ensure future enhancements or modifications to the system perform in accordance with specified technical and contractual requirements.
- 3 The CIO should implement a process for documenting, analyzing, and tracking suggestions and recommendations made by ERA stakeholders and ACERA.
- 4 The CIO should conduct and document a thorough assessment of the production version of the ERA system's preservation framework capabilities.
- 5 The CIO should establish a quality control process for reporting ERA preservation status to internal and external stakeholders and the public.

13-08 Audit of NARA's Preservation Program (Textual)

- 1a The Archivist should ensure an overarching preservation strategy is developed. Additionally, a risk based approach to holistically assess the agency's preservation needs and design the agency's preservation plan should be implemented.
- 1b The Archivist should ensure an analysis is conducted of the organizational structure and responsibilities of each office involved in preservation. This should include a determination whether the preservation strategy can be effectively implemented with a decentralized structure, or if one NARA office should have authority over the entire Preservation Program.
- 2 The Chief Innovation Officer and Executives for Research Services and Legislative Archives, Presidential Libraries and Museum Services, should ensure comprehensive preservation policies and procedures for each of their organizations are developed and/or updated.
- 3a The Chief Innovation Officer and Executives for Research Services and Legislative Archives, Presidential Libraries and Museum Services should completely identify the resources necessary to adequately accomplish NARA's preservation mission.
- 3b Develop a plan to identify the complete universe of textual and non-textual records that require preservation.
- 4 The Executive for Research Services should ensure a detailed analysis is performed and communicate about the risks versus the benefits associated with not using the existing risk assessment data to calculate the backlog for the Washington area Archives.
- 5a The Executive for Research Services should ensure an analysis is performed to determine if additional risk assessments for the Washington Area Archives and Presidential Libraries including older holdings should be completed. Identify the risks for not completing the assessments.
- 5b The Executive for Research Service should ensure additional measurable performance metrics are developed and implemented to track the progress within the Preservation Program.

REPORTING REQUIREMENTS

- 5c The Executive for Research Services should ensure a cost benefit analysis for the HMS circulation Module is completed. Request required resources if the cost benefit analysis identifies benefits to the agency.
- 5d The Executive for Research Services should ensure Denver, St. Louis, and Special Media implement HMS to record risk assessments.
- 6 The Executive for Legislative Archives, Presidential Libraries and Museum Services should ensure an analysis is performed to identify whether HMS should be implemented across the Libraries. If it is decided HMS will be implemented a timeline should be established. If it is decided HMS will not be implemented identify (1) how the existing system will meet the agency's preservation needs and (2) obstacles and risks for not implementing HMS.

13-09 NARA's Data Backup Operations

- 1 The CIO should create a full backup of the EOP instance of ERA as soon as the upgrade and data migration is complete.
- 10 The CIO, the Director of Acquisition Services, and NARA's Office of General Counsel should review purchases made for offsite storage costs to determine whether NARA's procurement process and Federal appropriations laws were violated and if so take appropriate corrective action.
- 2 The CIO should encrypt backup tapes containing sensitive PII or devise another method of protecting the data that provides a similar level of security.
- 3 The CIO should include the restoration of files from backups as part of the annual contingency plan testing for at least high impact systems such as ERA and CMRS.
- 4 The CIO should develop a process to regularly test data backups to verify information integrity.
- 5 The CIO should develop increased oversight procedures for the process of sending backup media offsite to ensure media is rotated offsite as prescribed.
- 6 The CIO should evaluate the risks associated with storing backup tapes within the same geographic area as AII and determine whether the current strategy is sufficient.
- 8 The CIO should review the current list of Iron Mountain containers assigned to NARA and return those containers that are no longer needed.
- 9 The CIO should examine the contents of those containers marked as permanent and determine whether permanent storage is still required.

13-10 NARA Archival Facilities

- 1a The COO should ensure a comprehensive review of the Standards is completed. Additionally roles and responsibilities for offices involved in the execution of the directive are clearly defined
- 1b The COO should ensure a plan is developed including a timeline for when the archival storage facility reviews will be completed.
- 1c The COO should ensure an accurate listing of facilities currently compliant with the Standards along with the area of deficiencies is identified and communicated.
- 1d The COO should ensure resources needed to make all archival storage facilities compliant by 2016 are identified. If the facility cannot be brought into conformance with the Standards, determine and document what mitigating actions have been implemented.
- 1e The COO ensure PMRS is updated to accurately reflect percentage of archival holdings in appropriate space.

13-11 Audit of ERA Ingest Efforts

- 1 The COO assess Federal agency usage of Base ERA and implement a process to improve the records management workload and records management practices that exist between NARA and Federal agencies to ensure electronic records are being properly transferred.
- 2 The COO identify the most efficient and effective method of ingest and require Federal agencies to follow this method when transferring electronic records into base ERA. In addition this information should be properly disseminated to Federal agencies.

REPORTING REQUIREMENTS

- 3 The COO work with NARA's Chief Information Officer to continue the detailed analysis of race conditions related to Base ERA. After the conclusion of this analysis NARA should use the information learned to create a plan to analyze and correct the issues identified.

13-12 Audit of the NARA IDS

- 1 The CIO should evaluate the access requirements each user needs to perform their job responsibilities, limit the global administrator privilege to only those whose job responsibilities require the exclusive permissions, and establish permission groups allowing users to access limited reports or functionalities within the system.
- 10 The CIO should perform a cost benefit analysis for enabling the intrusion prevention option for the network-based IDPS.
- 12 The CIO should ensure the preliminary reporting of all incidents and events reportable to US-CERT is made with the specified timeframes. Further details on the incident or event gathered after the original reporting should be communicated to US-Cert as an update.
- 14 The CIO should ensure incident response tabletop exercises are conducted for staff performing and/or supporting computer security incidents on at least an annual basis, and practical and relevant topics to NARA's computing environment are covered within the exercises.
- 15 The CIO should develop a policy for CIRT members to take training at least on an annual basis to ensure they remain up to date with current patterns/types of cyber attacks and effective, efficient incident remediation methodologies.
- 16 The CIO should fully develop and document a process for reviewing the list of individuals with access to systems hosted in NARA's computer rooms, define the frequency of the review in accordance with system categorization and availability requirements and ensure the frequency is properly documented in the system's SSP.
- 17 The CIO should fully develop and document the process for reviewing visitor logs for NARA's computer rooms, including clearly defined review frequencies and assignment of the duties to appropriate individuals for performing reporting and acting upon the review.
- 18 The CIO should fully develop and document the policies and procedures for a cable management system, including labeling using proper cable ties and or trays and periodic inspection of the cables for the HIPS and antivirus management system.
- 4 The CIO should consider conducting a cost-benefit analysis on deploying the system to all NARA unclassified systems connected to the network.
- 5 The CIO should develop a comprehensive quality assurance surveillance plan that includes the services provided by the contract, surveillance methods for each service, and designation of the surveillance monitoring duties to appropriate individuals or offices.
- 6 The CIO should develop a comprehensive method to verify that the actual performance data included on the contractor's Monthly Compliance Reports is complete and accurate for each service provided by the contractor.
- 7 The CIO should develop a comprehensive process to ensure SLA credits are requested in a timely manner by designated individuals at NARA and to verify whether the amount of credit received is accurate based on the SLA type and number of consecutive months the SLA miss occurred.
- 8 The CIO should request corrected Monthly Compliance Reports including the actual performance values for all services NARA procured from the contractor for the last six months review the reports to determine whether there were any unmet SLAs for which NARA would be entitled to a credit, and request the identified credit(s), if any, in accordance with the contract.

REPORTING REQUIREMENTS

13-14 Audit of the Processing of Textual and Electronic Records

- 1 The Archivist should ensure an analysis is conducted of the organizational structure and responsibilities of each office involved in processing. This should include a determination whether the processing strategy can be effectively implemented with a decentralized structure, or if one NARA office should have authority over the entire Processing Program.
- 2a The Executive of Research Services should coordinate with the Executive for Legislative Archives, Presidential Libraries and Museums to develop a processing policy and agency definitions. This policy and definition should highlight the difference between Federal records processing and processing of Presidential records.
- 2b The Executive of Research Services should ensure the San Bruno, St. Louis, and Chicago field locations have a current processing backlog reduction plan. These plans should be developed yearly and updated periodically during the year as necessary.
- 2c The Executive of Research Services should ensure the cost benefit analysis study on serving unprocessed records is completed, and ensure it outlines the risks and benefits of serving unprocessed records with an appropriate strategy consistent across the agency.
- 2d The Executive of Research Services should conduct a workload analysis to determine if resource allocation between AI and AII is appropriate.
- 3 The Executive for Legislative Archives, Presidential Libraries and Museums should (a) analyze the backlogs at the pre-PRA libraries and create processing plans for reducing the backlogs at these libraries on a more accelerated basis; (b) assess if there are additional way to accelerate processing at the PRA libraries; (c) work with the Performance and Accountability Office to update the PMRS metadata to require an ARC entry prior to considering Presidential records processed.
- 4 The Executive for Research Services and the Executive for Legislative Archives, Presidential Libraries and Museums, should work with the Performance and Accountability Office to reassess current processing goals and make changes to the goals.
- 5a The Executive for Legislative Archives, Presidential Libraries and Museums should work with the Performance and Accountability Office to develop a performance measure for tracking the process of electronic presidential records.
- 5b Determine the true backlog of electronic presidential records and determine if additional resources are needed and can be obtained to handle the increased workload.
- 6 The Executive for Legislative Archives, Presidential Libraries and Museums and the Executive for Research Services should ensure a review is performed to validate the accuracy of processing data supplied to the Performance and Accountability Office.
- 7 The Executive of Research Services should ensure procedures for all field locations are documented. Review existing procedures and update as necessary.
- 8 The Executive for Legislative Archives, Presidential Libraries and Museums should ensure procedures for all Presidential libraries are documented, and review existing procedures and update them as necessary.