

**OFFICE OF INSPECTOR GENERAL  
NATIONAL ARCHIVES AND RECORDS ADMINISTRATION**

**Audit of NARA's Processing of Military Interfiles and Refiles  
at the National Personnel Records Center**

**OIG Audit Report No. 15-06**

**February 10, 2015**

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## Executive Summary

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The National Personal Records Center (NPRC), located in St. Louis, Missouri, is the central repository of personnel-related records for both military and civilian services. The NPRC stores records of individual military service pertaining to former service members who no longer have a service obligation. In 2012 the National Archives and Records Administration (NARA) Office of Inspector General (OIG) notified the Archivist of the United States in Management Letter 12-18, *Veteran's Records Issues*, that records housed at the NPRC were found abandoned off the grounds of the facility. The OIG initiated a criminal investigation of the incident, which led to the prosecution of two employees, and the termination or resignation of five employees. In the Management Letter we discussed the lack of internal controls, and ineffective internal controls that left the OIG with no confidence veterans' Official Military Personnel Files (OMPF)<sup>1</sup> and their contents were adequately protected.

Management agreed to the initial findings noted in the Management Letter and took several actions to reduce the possibility of recurrence. The Archivist of the United States requested we perform this audit to ensure processes put in place by the NPRC were appropriately working. Another concern at the start of this audit was the FY 2014 termination of two employees who manipulated military personnel records (MPR) transactions within the Case Management and Reporting System (CMRS).<sup>2</sup> The employees exploited a system bug in CMRS which enabled them to copy transactions, assign the new transactions to themselves, close them out without having to take any action, and take credit for the copied transactions which never existed. Management has since deactivated the capability allowing the technicians to copy transactions.

In this audit, we assessed the effectiveness and adequacy of management controls in place for managing and accounting for records at the NPRC. Specifically, we (1) followed-up on issues identified in Management Letter No. 12-18 including reviewing the refile<sup>3</sup> and interfile<sup>4</sup> processes; and (2) reviewed the processing of requests within CMRS. We found the internal controls put in place by management to address issues cited in Management Letter 12-18 significantly improved and enhanced the management control environment. However, our audit identified opportunities to further strengthen the overall internal control environment.

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<sup>1</sup> Primarily an administrative record, containing information about the member's service history such as: date and type of enlistment/appointment; duty stations and assignments; training, qualifications, performance; awards and decorations received; disciplinary actions; insurance; emergency data; administrative remarks; date and type of separation/discharge/retirement; and other personnel actions.

<sup>2</sup> CMRS is a database used to manage customer requests for military personnel, medical, and organizational records stored at the NPRC.

<sup>3</sup> The physical act of replacing the records in their correct locations in the stacks.

<sup>4</sup> The process of filing "loose" or "late-flowing" documents which are found to be apart from their intended record, potentially leaving the record incomplete.

We noted:

- The NPRC had no available rationale for reviewing five percent of interfile batches;
- The Batch Control Application (BCA)<sup>5</sup> does not accurately select, capture, and report all interfile reviews performed;
- Supervisor reviews of refile and interfile documentation were either not completed or evidenced in a timely manner;
- Exit inspections were not fully implemented at the NPRC; and
- Under-shelf inspections<sup>6</sup> were not consistently performed for all the NPRC stack areas.

This report contains five recommendations which upon implementation will assist NARA in continuing its efforts to provide accountability and management of records at the NPRC.

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<sup>5</sup> The Batch Control Application is used to track and process interfile documents.

<sup>6</sup> Inspections of the NPRC's 15 stack areas to look for loose, misfiled, intentionally or unintentionally misplaced interfile documents.

## Background

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The National Personal Records Center (NPRC), located in St. Louis, Missouri, is the central repository of personnel-related records for both military and civilian services. The NPRC stores records of individual military service pertaining to former service members who no longer have a service obligation. The Official Military Personnel File (OMPF) is a permanent record of the United States and becomes official property of the National Archives and Records Administration (NARA) 62 years after the service member's separation from the military.

The NPRC responds to over 1.4 million annual requests for military personnel and/or medical records. To request military service information or documents, veterans or their next-of-kin can submit a request online using eVetsRecs<sup>7</sup> or by submitting Standard Form-180 (SF-180)<sup>8</sup> via mail or fax. Emergency requests are also accepted when there is a deadline associated with the request (e.g. upcoming surgery, funeral, etc.). Nearly half of all requestors seek only a copy of the separation document (DD Form 214, Report of Separation, or equivalent)<sup>9</sup>, the document required for many veteran benefits. Response time for records requested from the NPRC varies and is dependent upon the complexity of the request, the availability of records, and the NPRC's workload. Ninety-two percent of the time requests for separation documents are completed within 10 days. However, requests involving reconstruction efforts due to the 1973 Fire<sup>10</sup>, or older records which require extensive search efforts, may take six months or more to complete.

The Military Records Retrieval Branch (AFN-MR) at the NPRC is responsible for the records refile and interfile processes. AFN-MR uses the Case Management and Reporting System (CMRS) to manage customer requests for military personnel, medical, and organizational records stored at the NPRC. The database tracks and processes both electronic and mailed-based requests from receipt through fulfillment and closure. Refiles are tracked in CMRS. The refile process is the physical act of replacing veterans' records in their correct locations in the stacks. The interfile process is filing "loose" or "late-flowing" documents which are found to be apart from their intended veteran record, potentially leaving the record incomplete. Interfiles are tracked in the Batch Control Application (BCA).

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<sup>7</sup> Online system allowing veterans and their families to request information from military personnel records.

<sup>8</sup> Form used to request military records.

<sup>9</sup> A report of separation is issued when a service member is released or discharged from active duty. The report contains information normally needed to verify military service for benefits, retirement, employment and membership in veterans' organizations.

<sup>10</sup> The 1973 Fire at the NPRC damaged or destroyed records documenting the service history of former military personnel. Sometimes the NPRC is able to reconstruct the information using alternate records in their holdings or with information from other external agencies.

### False Transactions in CMRS

In March 2014, two employees were terminated after manipulating Military Personnel Records (MPR) transactions within the CMRS. The employees exploited a system bug enabling them to copy transactions, assign the new transactions to themselves, close them out without having to take any action, and take credit for copied transactions which never existed. After discovery, management deactivated the capability allowing the technicians to copy transactions.

The two individuals' production was over-reported for 17 months. Although they received no monetary gain or productivity awards for work performed during that period, their actions resulted in overcharges to service branches. Credits were subsequently given to the service branches.

### Prior Investigation

In FY 2012, NARA's Chief Operating Officer contacted the OIG after veterans' documents were discarded in a wooded area off the grounds of the NPRC. The OIG conducted an investigation. Five employees either admitted they removed, concealed, destroyed, or attempted to destroy records. As a result of the investigation, one employee was terminated from federal service and four others resigned. Two of the employees plead guilty to one count each of misdemeanor theft of public records and were sentenced to two years probation.

### Prior Report

In 2012 the OIG issued Management Letter No. 12-18, *Veteran's Records Issues*. The Management Letter discussed the lack of internal controls, and ineffective internal controls in place, which left the OIG with no confidence veterans' OMPFs and their contents were adequately protected. It identified several issues related to interfiles, including:

- The NPRC did not screen individuals exiting the facility for records.
- Interfile audits originally conducted at the NPRC did not include all employees worked on interfile tasks.
- Interfile documents before June 2011 could not be associated with the employee that filed them. Therefore, if they were removed, intentionally hidden or filed incorrectly at the NPRC it would be impossible to identify the responsible employee.
- Notifications were not made to affected parties when misfiled documents were discovered.
- Over 4,000 records, including originals, were recovered at the NPRC's previous facility. Some of these records were intentionally hidden and wedged between shelving units.

- The stacks in the new NPRC facility had areas under the bottom shelves where records could be stashed in the same manner they were at the old facility.
- Refile records were filed improperly despite the NPRC's use of a CMRS which uses bar codes to track records.

Management concurred with the initial findings regarding the need for improvement of internal controls, particularly as they relate to interfile transactions. Management took a number of actions to reduce the possibility of recurrence of the issues identified. The Archivist of the United States also requested the OIG complete an audit to determine if the processes put in place were working appropriately.

## Objectives, Scope, Methodology

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The objective of this audit was to assess the effectiveness and adequacy of management controls in place for managing and accounting for records at the NPRC. Specifically, we (1) followed-up on issues identified in Management Letter No. 12-18, *Veteran's Records Issues*, including reviewing the refile and interfile processes; and (2) reviewed the processing of requests within CMRS. The audit was conducted at the NPRC in St. Louis, Missouri and Archives II in College Park, Maryland.

In order to accomplish our objective we interviewed representatives from the NPRC and Accounting Policy and Operations. We also reviewed:

- NPRC 1865.126, *Standard Operating Procedures for Refile Section, Records Retrieval Branch*, July 2014; NARA 241, *Managing Government Personal Property*, April 2011; NARA 241 Supplement, *NARA Government Personal Property Operating Guide*; and Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government*, September 2014.
- Management Letter No. 12-18, *Veteran's Records Issues* (dated July 30, 2012), and determined whether findings identified were adequately addressed with the management controls put in place.
- Processing of MPR transactions in CMRS.
- Interfile, refile, exit inspection, and under-shelf processes at the NPRC, including new management controls put in place.
- Pertinent information regarding the false transactions in CMRS.

We obtained interfile and refile batch documentation from the NPRC. We judgmentally selected 50 documents to determine if they were accurately interfiled in the intended veteran record. We also judgmentally selected 40 veterans' records to determine if they were refiled in their correct locations in the stacks. The results of a non-statistical sample cannot be projected to the intended population.

This performance audit was conducted in accordance with generally accepted government auditing standards between July 2014 and December 2014. These standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



## Audit Results

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### 1. No Rationale Was Identified for Reviewing Only Five Percent of Interfiles.

Our review determined the NPRC had no available rationale for reviewing<sup>11</sup> five percent of interfile batches. NPRC had a policy of reviewing five percent of interfile batches because the policy stated it relied on an FRC policy that does not exist. GAO, *Standards for Internal Control in the Federal Government*, states management should clearly document internal control and all transactions and other significant events in a manner allowing the documentation to be readily available for examination. The documentation may appear in management directives, administrative policies, or operating manuals, in either paper or electronic form. As a result, the NPRC cannot certify five percent interfile reviews are justifiable based on the number of interfile batches completed.

Prior to issuance of Management Letter 12-18, the NPRC conducted extensive reviews to include a 100 percent review of at least one batch of interfiles for every employee who worked on interfiles tasks during the six months prior to the discovery of the incidents discussed in the Management Letter. The purposes of the reviews were to (1) provide additional evidence to support the investigation and prosecution of the offenders; and (2) recover documents deliberately misfiled by the offenders.

After issuance of the Management Letter 12-18, the NPRC implemented reviews of five percent of all interfile actions to provide independent validation and verification of interfiled batches. The BCA randomly selects and identifies the five percent of interfiled actions for review. After selection, an employee goes to the stack area to verify and validate the document was correctly filed in the veterans' record.

We inquired with management about the rationale for the five percent interfile reviews, and they indicated it was an FRC policy. We also noted NPRC 1865.126, *Standard Operating Procedure for Refile Section, Records Retrieval Branch* states, "it is Federal Records Center (FRC) standard policy to audit five percent of all Interfile and Refile actions." When we requested documentation to support the FRC policy, management was unable to provide support. Management stated they believed the five percent reviews were reasonable, even though they

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<sup>11</sup> NPRC defines this process as an "audit," but the OIG will use the term "review" throughout the report in order to eliminate confusion between work performed by the OIG and the NPRC.

were unable to provide any analyses to support its reasonableness. Without rationale to support the reviews, it is difficult to determine if the five percent reviews are reasonable.

### **Recommendation 1**

The Executive for Agency Services should ensure an analysis is performed to determine whether the five percent interfile batch reviews are reasonable and update NPRC 1865.126 if needed.

### **Management Response**

Management concurred with the recommendation.

## **2. The Batch Control Application Does Not Accurately Select, Capture, and Report Interfile Reviews.**

We determined the Batch Control Application (BCA) did not accurately select, capture and report all interfile reviews performed. This condition occurred because the BCA is not correctly configured for interfile reviews, and management did not have procedures in place to monitor reports from the BCA on interfile reviews performed. GAO, *Standards for Internal Control in the Federal Government*, states management should evaluate both internal and external sources of data for reliability. Reliable internal and external sources provide data reasonably free from error and bias and faithfully represent what they purport to represent. Without the proper monitoring controls in place to accurately capture and report interfiles, management has no reasonable assurance interfiles are reviewed accurately.

The BCA was developed by the NPRC's Management Systems Staff for the interfile process. After batches of documents are interfiled, the BCA randomly selects and identifies the number of interfile actions an employee needs to confirm. After the employee confirms the presence of the randomly selected interfile documents in the veterans' records, this information is captured in the BCA. If the review confirms a defect-free batch, no further analysis is necessary. However, if the 5 percent review finds a defect, a mandatory 10 percent review is ordered. If additional defects are found, a 100 percent audit is conducted.

We obtained interfile review documentation and queries from the BCA for documents interfiled between January and July 2014. We noted the BCA did not accurately report all reviews performed, did not always select five percent for interfile reviews, and did not capture additional reviews performed. Specifically, we noted:

- Queries from the BCA identified 14,355 documents were interfiled during the testing period; and 1,481 of those documents were reviewed to confirm they were interfiled in the correct veteran's record. However, management indicated there were more

documents reviewed that were not captured and reported by the application. Management provided documentation supporting an additional 2,298 interfile documents reviewed. Although the documentation confirmed the completed reviews, the BCA did not capture these reviews.

- Queries from the BCA identified 361 interfile batches were processed in the BCA during the testing period. However, the queries indicated 140 of the batches were not reviewed by staff to confirm they were interfiled in the correct veteran's record, and 21 of the batches had less than five percent of the interfile documents reviewed. While not reported by the application, management provided subsequent documentation supporting review of the 140 batches. However, 34 of the 140 batches had less than five percent of the interfile documents reviewed.
- When an additional interfile batch review was required because of a confirmed defect, the BCA did not differentiate between the original review and additional review.
- The NPRC's Management Systems Staff indicated if defects were identified after the original five percent review, the BCA would select another 10 percent for review. Any further defects would result in a 100 percent review. However, in our conversations with management and staff, we noted there appears to be some confusion if the BCA is selecting an additional five percent or an additional 10 percent when an additional review is required.

Management cannot confirm interfile reviews are conducted for all batches if they are unable to accurately capture and report on the data from the BCA.

## **Recommendation 2**

The Executive for Agency Services should ensure:

- a) Standards are outlined for how the BCA will select interfile documents for all reviews, including after defects are identified.
- b) The BCA is configured to (1) accurately capture all reviews performed; (2) accurately select the documents for interfile reviews based on the agreed percentage, including any additional reviews; and (3) identify documents selected for reviews (differentiating between original and additional reviews).
- c) Periodic BCA reports are created and reviewed to evaluate the interfile review process.

## **Management Response**

Management concurred with the recommendation.

### **3. Supervisory Reviews for Interfile and Refile Processes Were Either Not Completed or Evidenced in a Timely Manner.**

We noted supervisor reviews of refile and interfile documentation were either not completed or evidenced in a timely manner. We also noted employees were not required to certify documents were refiled as required. These conditions occurred because management did not implement and monitor supervisory tasks for the interfile and refile processes. GAO, *Standards for Internal Control in the Federal Government*, indicates management should establish and operate monitoring activities to monitor the internal control system and evaluate the results. As a result, management cannot ensure interfile and refile policies are followed and reviews completed.

#### Untimely or No Supervisory Reviews Performed

During our review of interfile and refile documentation, we noted supervisors did not review refile documentation after records were refiled, or perform timely supervisory reviews. We reviewed a sample of 50 interfiled documents and 40 refiled records to verify the documents were interfiled in the intended veteran record or refiled in their correct locations in the stacks. We noted all of the documents were interfiled and refiled correctly; however, timely supervisory reviews were not conducted for a majority of the sample batches. For example, one of our sample batches was interfiled on March 19th. After the original review of the batch identified defects an additional review and supervisory review did not occur until April 9th and July 10th, respectively.

We also noted there was no supervisory review performed after veterans' records were refiled. Once a batch of records is refiled, the employee returns the charge out sheets<sup>12</sup> for CMRS scanning. The sheets are scanned and CMRS is updated to reflect the records as "refiled." After the sheets are scanned, there is no supervisory review of the batch documentation. During the audit, we brought this issue to management's attention. Management developed three CMRS change requests<sup>13</sup> that will provide the capability to produce reports for supervisory reviews of refiles.

Failure to properly supervise employees does not allow management the opportunity to verify work was performed or identify problems in the refile and interfile processes.

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<sup>12</sup> CMRS prepared documents used as placeholders when veterans' records are removed from their location in the stacks.

<sup>13</sup> The change requests were not implemented at the conclusion of our audit fieldwork.

### No Certification Statement Required for the Records Refile Process

After issuance of Management Letter 12-18, management added a certification statement to interfile check-sheets<sup>14</sup> for employees to certify every item associated with the check-sheets was properly filed. We noted when records were refiled, employees were not required to certify the records were properly refiled. During the audit, we brought to management's attention the inconsistency of having employees certify for one process and not the other. In response, a certification statement was added to the refile check-sheets effective August 2014 (See Appendix B).

The certification statement emphasizes the importance of employee accountability for the refile of veterans' records.

### **Recommendation 3**

The Executive of Agency Services should ensure supervisory controls are put in place for the interfile and refile processes, including items to be reviewed, timing, and evidence of the reviews.

### Management Response

Management concurred with the recommendation.

## **4. Exit Inspections Were Not Fully Implemented.**

We noted exit inspections were not fully implemented at the NPRC. Specifically, (1) all occupants of the NPRC were not required to participate in exit inspections, (2) the hours the exit inspections were conducted were not consistent with the NPRC's hours of operations; and (3) property passes were not required when employees removed NARA holdings or NARA owned equipment from the buildings. These conditions occurred because management did not fully incorporate all NARA required exit inspection processes. Pursuant to 36 CFR 1280.4, NARA may, at its discretion, inspect property in the possession of any NARA contractor, employee, student intern, visitor, volunteer, or other person arriving on, working at, visiting, or departing from any NARA property. As a result of the exit inspections not being fully implemented, management cannot ensure only authorized removal of NARA holdings and NARA owned equipment occurs.

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<sup>14</sup> CMRS prepared documents of the inventory of military records assembled on a cart and assigned to a refiler for returning to their proper record locations within the stacks.

### Exit Inspections for All Occupants

In Management Letter 12-18, *Veteran's Records Issues*, we noted the NPRC did not screen individuals exiting the facility for records. After issuance of Management Letter 12-18, the NPRC implemented exit inspections in September 2012. However, we noted all of the occupants of the NPRC have not agreed to the inspections although they have access to NARA records. The occupants were concerned with the financial impact on their leases. When exiting the NPRC those occupants use a separate lane from those required to participate in the inspections. Non-participating occupants are required to show their government issued identification badges to the Protective Security Officers (PSOs) as proof they are not required to participate. Management is in discussions with the remaining occupants to get them to adhere to the exit inspections.

Failure to properly screen all occupants of the facility could lead to undetected and unauthorized removal of records.

### Inadequate Hours of Coverage for Exit Inspections

We noted exit inspections did not occur during all of the NPRC's hours of operation. The NPRC allows employees to enter the facility as early as 5:30 a.m. However, if an employee exited the facility before 7:00 a.m. there were no PSOs on duty to conduct exit inspections.

During the audit we brought to management's attention the lack of coverage from 5:30 a.m. until 7:00 a.m. Management indicated this decision was based on the financial impact to the budget, which would require additional funding for the already \$300,000/year contract. Management also indicated there were few incidents where PSOs identified employees or visitors exiting the facility with NARA holdings. In response to our audit, the NPRC's exit inspections hours were expanded in August 2014 from 7:00 a.m. to 6:30 p.m. to 5:30 a.m. to 7:15 p.m.

Without adequate hours of coverage at the facility, personnel could potentially exit with unauthorized NARA holdings.

### No Requirements for NA Form 5030, Property Pass

We noted when individuals left the building with NARA owned equipment or holdings; they were not required to present a NA Form 5030, *Property Pass*. We also noted security forces did not maintain a list of personnel authorized to sign property passes, and copies of NA Form 5003, *Authorization to Sign Property Passes*, were not maintained at the exit point.

According to NARA 241, *Managing Government Personal Property*, when personnel use Government equipment outside of their normal area of operation, organization, building, or worksite, the Property Accounting Official grants authorization to personnel to remove the personal property by using NA Form 5030, *Property Pass*. The Supplement to NARA 241, *NARA Government Personal Property Operating Guide*, indicates property passes are enforced through security forces or other authorized personnel at other NARA locations (besides Archives I and Archives II) as follows:

- Ensuring a consolidated list of personnel authorized to sign property passes and copies of the NA Form 5003 are located at exit points.
- All personnel removing government personal property must present the item with the property pass to the security officer upon exiting the facility.
- Security personnel collect and turn in property pass forms on a weekly basis to the Administrative Officer for distribution to the Property Accountability Officer for review and disposition.

After we brought this issue to management's attention, a memo was issued in August 2014 to PSOs on the NPRCs Property Pass Procedures (See Appendix C). It included use of NA Form 5030, *Property Pass*, and a list of authorized officials that may sign the form.

Failure to properly ensure security of property acquired by NARA increases the risk of theft and unauthorized use.

#### **Recommendation 4**

The Executive for Agency Services should ensure exit inspections are mandatory for all occupants of the NPRC.

#### **Management Response**

Management concurred with the recommendation.

### **5. Monthly Under-Shelf Inspections Were Not Consistently Performed.**

We noted under-shelf inspections were not consistently performed for all the NPRC stack areas. This occurred because Archival Operations - St. Louis (RL-SL) did not want the AFN-MR personnel conducting inspections in RL-SL's designated stack areas. NPRC 1865.126 states under-shelf inspections are conducted throughout the stack areas per the designated schedule. If

the NPRC does not perform under-shelf inspections, documents may intentionally be stored or unknowingly misplaced under shelves and not available when requested by veterans.

Management Letter 12-18, *Veteran's Records Issues*, noted as the NPRC's old facility was decommissioned; various documents including original records were recovered. These included large caches of intentionally hidden interfile documents in pillars, intentionally hidden piles of microfiche military retiree files, files stuffed between the floor and shelf, and files wedged between shelving units. It was also noted there was the opportunity for records to be stashed in the same manner, or accidentally get misplaced, at the NPRC's new facility under the bottom of the shelves. In order to mitigate the risk of improperly stored documents, management implemented monthly under-shelf inspections of the NPRC's 15 stack areas to look for loose, misfiled, intentionally or unintentionally misplaced interfile documents. Any documents found are properly filed in veterans' records. A checklist is used to document the inspection and any anomalies.

We reviewed the inspection reports for the months of January through July 2014, noting inspections were not conducted for the month of June for stack areas nine through thirteen. Management indicated RL-SL's management requested the inspections to stop for those stack areas since they were used by the Archival Division only. During fieldwork, RL-SL's management agreed to allow an RL-SL employee to escort an AFN employee through stack areas nine through thirteen when the inspections are conducted. In the future, management will train an RL-SL employee to perform the under-shelf inspections for their designated stack areas.

Without consistently performing the monthly under-shelf inspections management cannot ensure loose documents are not misplaced or improperly stored.

### **Recommendation 5**

The Executive for Agency Services should ensure a formalized policy is created for the under-shelf inspections, including which divisions will be responsible for completing the inspections.

### **Management Response**

Management concurred with the recommendation.



## Appendix A – Acronyms and Abbreviations

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AFN	National Personnel Records Center
AFN-MR	Military Records Retrieval Branch
BCA	Batch Control Application
CMRS	Case Management Reporting System
FRC	Federal Records Center
GAO	Government Accountability Office
MPR	Military Personnel Records
NARA	National Archives and Records Administration
NPRC	National Personnel Records Center
OIG	Office of Inspector General
OMPF	Official Military Personnel File
PSO	Protective Security Officer
RL-SL	Archival Operations – St. Louis
SF-180	Standard Form 180

## Appendix B – Refile Check-Sheet

NATIONAL PERSONNEL RECORDS CENTER  
1 ARCHIVES DRIVE ST LOUIS, MO 63168-1002  
www.archives.gov



Date : **DRAFT**

Subject : CMRS Refile Check-Sheet Format Change and Required Statement

1. The CMRS Refile Check-Sheet is a paper inventory of military records that had been assembled on a cart and assigned to a refiler for returning to their proper record locations within our holdings. The CMRS Refile Check-Sheet also serves to document the refiler's actions and hold him/her accountable in the performance of their duties.
2. The Interfile Check-Sheet is similar to, and serves the same basic purpose as the CMRS Check-Sheet; however, the Interfile Check-Sheet contains a statement that the Interfiler is required to sign and date and certify to the fact that he/she was diligent in the performance of their duties.
3. Per the NARA Inspector General's review of our CMRS and Interfile Process during the week of July 14, 2014, they recommended that we also add a similar certification to our CMRS Refile Check-Sheet. Effective immediately, the following format and handling changes to the CMRS Refile Check-Sheet will become effective:

- a. Every page of the CMRS Refile Check-Sheet will contain the Batch Number, Cart Number, Cart Maker's Initials, Cart Scanner's Initials, and the time and date the CMRS Refile Check-Sheet was created. In addition, every page of the CMRS Refile Check-Sheet will also contain the following statement:

Unless otherwise documented above, I certify that every item associated with this check-sheet has been properly filed.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

- b. The CMRS Refiler will print his/her full name, then sign, not initial, and date every statement upon every page of the check-sheet in the spaces provided upon completion of their task.
  - c. The CMRS Auditor is responsible for ensuring that every statement is properly signed and dated upon completion of the refiler's task.
  - b. The CMRS Auditor is responsible for retaining the completed, original CMRS Refile Check-Sheets along with a copy of the appropriate Batch, Task and Audit Sheet. These items will be retained and disposed per the Records Schedule.
2. This process will remain in effect until further notice, and the new requirements described above will be captured in future updates to the Standard Operating Procedure (SOP) for Refile Section, Records Retrieval Branch.

Assistant Branch Chief  
Refile Section

# Appendix C – New Property Pass Procedures



## National Personnel Records Center

1 Archives Drive, St. Louis, Missouri 63138

Date: 4 August 2014

MEMORANDUM FOR: National Personnel Record Center (NPRC) Protective Security Officer (PSO) Posts 5, 7, 8, and 9.

SUBJECT: NPRC Property Pass Procedures

NA Form 5030, Property Pass, authorizes NARA personnel or non-NARA personnel with NARA property to remove government owned property from NARA facilities. Any NARA personnel removing government owned property from NPRC must give a NA Form 5030 to the PSO upon exit, regardless of the property being accountable or non-accountable. For NPRC personnel the PSO should compare the user information to the individuals PIV/or NPRC badge (blocks 1 -4) and ensure that the approval authority (blocks 19 - 22) is one of the following:

[Redacted] / Operations Branch  
[Redacted] / Operations Branch  
[Redacted] / Operations Branch  
[Redacted] / Preservation Branch  
[Redacted] / Preservation Branch  
[Redacted] / IT  
[Redacted] / RRB Branch Chief

[Redacted] / Archival Division  
[Redacted] / Archival Division  
[Redacted] / Core 1 Branch Chief  
[Redacted] / Core 2 Branch Chief  
[Redacted] / Core 3 Branch Chief  
[Redacted] / Core 4 Branch Chief

- NARA accountable government property will have a blue NARA Property sticker with bar code. Examples of NARA accountable property are cameras and laptop computers.
- NARA IT government equipment will have a red NARA IT hardware sticker with barcode. Examples of NARA IT equipment are PCs, printers, scanners, and servers.
- NARA government non-accountable property might include items such as wheel chairs, furniture, dollies, telephones, and power tools.

Visiting NARA employees exiting with government property must also give a copy of NA Form 5030 to the PSO. For these personnel the PSO need only compare the user information to the individuals PIV/or badge (blocks 1 -4).

Operations Branch personnel will collect the NA Form 5030s from the PSO posts weekly in provided folders. This policy applies to NARA/NPRC personnel only and/or other personnel exiting with NARA property and in possession of a NA Form 5030. Any concerns or questions that may arise for the PSOs concerning this policy should be directed to NPRC Operations Branch personnel at 1-0783/0647/9169.

If at any time a PSO has reason to believe a NARA employee is exiting with government property without a property pass the PSO will document the event, allow individual to depart, and notify Operations Branch.

Attachments:  
Example NA Form 5030  
Example of accountable and IT property stickers

//signed//  
[Redacted]  
Physical Security Specialist  
Military Operations Branch  
NPRC Facility

//signed//  
[Redacted]  
Inspector  
R6, Eastern District  
DHS

National Archives and Records Administration

## Appendix D - Management's Response to the Report

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Date: FEB 06 2015  
To: James Springs, Acting Inspector General  
From: David S. Ferriero, Archivist of the United States  
Subject: OIG Revised Draft Audit Report 15-06, Audit of NARA's Processing of Military Interfiles and Refiles at the National Personnel Records Center

Thank you for conducting this audit to address concerns regarding the effectiveness of processes and controls in the accounting and managing of veterans' records at the National Personnel Records Center. We appreciate your recognition that recently implemented internal controls have significantly improved the management control environment.

NARA remains committed to ensuring that veterans' records entrusted to our care are held in the highest regard with appropriate safeguards to ensure their secured, permanent storage, and prompt accessibility. We concur with all of the five recommendations in this audit, and will address them further in our action plan.



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