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May 6, 2016

**TO:** David S. Ferriero  
Archivist of the United States

**FROM:** James Springs *James Springs*  
Inspector General

**SUBJECT:** *Re-issued<sup>1</sup> - NARA's Preparation and Planning for the Receipt of President Obama's Administration's Records and Artifacts - Report 16-06*

Attached for your action is our final report (re-issued), *Audit of NARA's Preparation and Planning for the Receipt of President Obama's Administration's Records and Artifacts*. We incorporated the formal comments provided by your office. The report contains two recommendations for enhancing NARA's preparation for the electronic records from President Obama's administration and its compliance with the Presidential Records Act. Your office concurred with the two recommendations.

In accordance with NARA Directive 1201, *Audits of NARA Programs and Operations*, section S7.m, within 45 days<sup>2</sup> of the date of this memorandum, please provide our office with a written response that includes your (1) corrective action plan and (2) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendations. Until your response is received and evaluated, the recommendations will be considered open and unresolved.

As with all OIG products, we will determine what information is publically posted on our website from the attached report. Consistent with our responsibility under the *Inspector General Act, as amended*, we may provide copies of our report to congressional committees with oversight responsibility over the National Archives and Records Administration. Please call me with any questions, or your staff may contact Jewel Butler, Assistant Inspector General of Audits, at (301) 837-3000.

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<sup>1</sup> This audit report was re-issued as a result of management's request to update their response letter.

<sup>2</sup> The corrective action plan and target completion date for each recommendation must be provided 45 days of original memorandum dated April 19, 2016.

NATIONAL ARCHIVES *and*  
RECORDS ADMINISTRATION

OFFICE *of*  
INSPECTOR GENERAL



Re-issued Audit of NARA's Preparation and  
Planning for the Receipt of President  
Obama's Administration's Records and  
Artifacts

May 6, 2016

OIG Audit Report No. 16-06

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## Executive Summary

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On January 20, 2017, legal custody of the records from President Barack Obama's administration will transfer to the National Archives and Records Administration (NARA). The Presidential Records Act (PRA) gives the Archivist of the United States (AOTUS) responsibility for the custody, control, and preservation of Presidential records upon the conclusion of a President's term of office. The PRA states the AOTUS has an affirmative duty to make such records available to the public as rapidly and completely as possible consistent with the provisions of the Act; such public access does not commence until five years after the President leaves office. In addition, NARA strives to be able to respond as soon as possible to time-sensitive and often high-visibility special access requests for these records, which come from former and incumbent Presidents, the courts, and the Congress. Providing such access, however, must be consistent with the Archivist's responsibility for assuming "the custody, control, and preservation of" the Presidential records.

The objective of this audit was to review the preparation and planning for the transfer of the Obama Administration's records. Specifically, we reviewed planning for the receipt of textual and electronic records, as well as artifacts/gifts from the Obama Administration. We found internal controls related to textual and classified records; and the artifacts/gifts in courtesy storage, have been implemented, and appear to be operating effectively.

We also found, although NARA is addressing the technical aspects of the transfer and working with the staff of the Executive Office of the President (EOP) to prepare for the transition of electronic records to NARA's physical custody, NARA lacks assurance the Electronic Records Archive (ERA) EOP system will respond as intended to a significant ingest. NARA has not received a comprehensive inventory, or a large volume, of electronic records from the current administration to adequately test the ERA EOP system. As a result, NARA may not be able to rely on the ERA EOP System to comply with the PRA and respond to special access requests in a timely manner.

In addition, NARA lacks a documented contingency plan should the ERA EOP System fail to handle the Obama electronic records in a timely manner. Based on the planning and analyses performed to date, NARA officials are confident the ERA EOP System will be able to adequately handle the electronic records from the Obama administration. However, NARA has no control over the quality of the data samples or when the data will be transferred. Without a contingency plan in place, NARA lacks assurance it will be able to rely on the ERA EOP System to comply with the PRA. While we recognize that many of these issues are outside of NARA's control, and the administration is not

required to provide any records to NARA prior to inauguration day, this does not relieve NARA of its responsibilities under the PRA.

This report was re-issued because management sent a revised response to us 10 days after the final report was originally issued. Management added a statement in their revised response that acknowledged this report, as with all audit reports, only addresses matters up to the conclusion of audit field work, and reiterated field work ended in January 2016, as is stated on page 7 of the report.

We made two recommendations to enhance NARA's preparation for the electronic records from President Barack Obama's administration and its compliance with the PRA.

## Background

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On January 20, 2017, legal custody of the records from President Barack Obama’s administration will transfer to the National Archives and Records Administration (NARA). The Presidential Records Act (PRA) gives the Archivist of the United States (AOTUS) responsibility for the custody, control, and preservation of Presidential records upon the conclusion of a President’s term of office. The PRA states the AOTUS has an affirmative duty to make such records available to the public as rapidly and completely as possible consistent with the provisions of the Act; such public access does not commence until five years after the President leaves office. In addition, NARA strives to be able to respond to time-sensitive and often high-visibility special access requests for these records, which come from former and incumbent Presidents, the courts, and the Congress, as soon as possible after the President leaves office. Providing such access, however, must be consistent with the Archivist’s responsibility for assuming “the custody, control, and preservation of” the Presidential records.

While NARA is the agency tasked with moving the incumbent President’s records and artifacts, other government agencies provide assistance and work on different parts of the transition. The move is done in close conjunction and cooperation with many White House and Vice Presidential staff and offices, and also with the Department of Defense (DoD). Because all records and artifacts moved before the end of the presidency are still in the President’s or Vice President’s legal control, NARA must receive approval from the administration to start moving records as early as possible.

At the outset of a presidential administration, NARA begins preparing for the eventual move of records by offering the administration courtesy storage for artifacts and textual records that do not need to be physically stored in the White House compound. Courtesy storage, offered to Presidents and Vice Presidents, means the records are in the physical possession of NARA until legal custody transfers to the AOTUS. The incumbent President and Vice President maintain legal custody over the records and artifacts during their terms.

While the records are in courtesy storage, NARA’s Presidential Materials Division provides reference service to the incumbent and returns the records to the Executive Office of the President (EOP), if requested, in a one-hour turnaround time, 24 hours a day. The records, gifts, and historical materials in courtesy storage are made available only to the EOP as requested by their designated Offices for reference. Boxes of textual records in courtesy storage remain sealed while in NARA’s physical possession. NARA’s Presidential Materials curatorial staff stores the artifacts, ensures museum standards are met, and assists the EOP on artifact loans. NARA’s courtesy storage of

records and artifacts significantly reduces the volume of material that needs to be transferred from the White House during the final months of an administration.

NARA works with the General Services Administration to identify temporary space to store textual Presidential records, other historical materials, and artifacts until a Presidential Library is made available to the Federal Government for operation by NARA according to the requirements of the Presidential Libraries Act of 1955 (as amended). The space must be appropriate for the care and preservation of archival textual and non-textual records; and a vast array of artifacts—three-dimensional holdings received by the President in the course of his tenure as President, as well as, other items documenting his life and career.

In the case of a two-term President leaving office, NARA begins moving records as soon as authorized by the incumbent Administration and a temporary library site is ready to receive the records, which is usually sometime in late fall before the election. It is crucial that NARA, with DoD assistance, begin these moves months in advance because the volume and complexity of these moves cannot be handled in the last few days or weeks of a presidential administration.

NARA works with White House and Vice Presidential counsels, the White House Office of Records Management, the National Security Council, the White House Gifts Office, and other White House offices and the Office of the Vice President to receive approval for early moves, coordinate on what records and artifacts can move, and determine the associated timeframes. Additionally, throughout the presidential administration, these offices have worked to establish initial control and arrangement over the records and artifacts, provide preliminary descriptions at the folder, box, or artifact level, and prepare these materials for eventual transfer to NARA. See Appendix B for more information on the history of NARA's involvement with Presidential moves.

For presidential electronic records, NARA operates the Electronic Records Archive (ERA) EOP System that preserves and provides authorized access to electronic records under the PRA. ERA EOP is NARA's secure, internal electronic archival system that ingests, stores, and controls access among authorized users allowing them to search, manage, and output electronic PRA records, as well as some electronic records under the Federal Records Act, after an orderly, accurate, and complete transfer of records. The current production version holds about 82 terabytes of data from the George W. Bush administration. The ERA EOP system is physically located in NARA-controlled space at the Allegany Ballistics Laboratory in Rocket Center, West Virginia.

## Objectives, Scope, Methodology

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The objective of this audit was to review the preparation and planning for the transfer of the Obama Administration's records. Specifically, we reviewed the planning for the receipt of textual and electronic records, as well as artifacts/gifts from the Obama Administration.

To accomplish our objective we reviewed the following: The PRA, the Presidential and Federal Records Act Amendments of 2014, the Office of Records Management Pickup Procedures, Classified Pickup Procedures, and Transfer Procedures for White House Gifts. In addition, we reviewed the internal controls and toured the courtesy storage areas for textual and classified records, as well as artifacts/gifts. We also reviewed prior OIG audit products related to the ERA EOP System and presidential gifts. See Appendix C for a synopsis of these products.

We interviewed NARA personnel from the Offices of Presidential Materials, Presidential Libraries, General Counsel, and Information Services responsible for the planning, managing, storing, tracking, and security of the Obama administration's records and gifts in courtesy storage; and for the receipt of electronic records. We obtained and analyzed the ERA EOP Submission Information Package Ingest Process Guidelines and Governance Model, and an independent vendor assessment of the scalability of the current system design.

Our audit work was performed at Archives I in Washington, DC and Archives II in College Park, MD between June 2015 and January 2016. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that 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 that the evidence obtained provides a reasonable basis for our finding and conclusion based on our audit objective.



## Audit Results

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As previously mentioned, the PRA gives the AOTUS responsibility for the custody, control, and preservation of Presidential records upon the conclusion of a President's term of office. The PRA states the AOTUS has an affirmative duty to make such records available to the public as rapidly and completely as possible consistent with the provisions of the Act. We found internal controls related to textual and classified records; and the artifacts/gifts in courtesy storage, have been implemented, and appear to be operating effectively. However, there are some risks associated with the transfer of electronic records from the Obama Administration.

### **Electronic PRA Records Transition Risks**

Although NARA officials have been taking actions planning for the transfer of the electronic records from the Obama Administration, they lack assurance the ERA EOP System will respond as intended to a significant ingest. NARA has not received a comprehensive inventory, or a large volume, of electronic records from the current administration to evaluate and adequately test the system. As a result, NARA may not be able to rely on the ERA EOP System to comply with the PRA.

#### Actions Taken by NARA

On January 20, 2017, legal custody of all the records of President Barack Obama's administration will transfer to NARA. NARA has the responsibility to secure these records, and to search them in response to special access requirements immediately after the end of the administration. To that end, NARA is working with EOP staff to prepare for the transition of these records to NARA's physical custody.

According to NARA officials, preparation for the prior PRA transfers of electronic records did not gear up until one year before the event. However, for the Obama transition, preparation activities increased significantly beginning January 2015. NARA staff from Information Services, along with representatives from General Counsel and the Presidential Materials Division attends the EOP-NARA Quarterly meetings and Bi-Weekly Technical Working Group (TWG) meetings, as scheduled and hosted by the EOP. The quarterly meetings are higher level, with executives and counsel from both agencies present. The TWG meetings are between staff working transfer preparation from the technical and records standpoints, with regular participation from policy and counsel staff. NARA technical and program personnel also attend ad hoc meetings and consultations onsite at EOP on a daily basis.

NARA has also been conducting data type analysis<sup>1</sup> of record sample exports from record-producing systems onsite at EOP that have previously seen high-access demand (i.e., priority record types). This work will continue in FY16, along with installation and operation of NARA's data transport hardware and software (DATR) system at the EOP's data center. According to NARA officials, the DATR system will be compatible with NARA's current ERA EOP System architecture and implementation, and will allow NARA to implement archival controls and services on the PRA sets to be transferred (such as inventories, data format compliance, audit baselines, and indexes) sooner than in previous transfers. After the completion of EOP records production, and the staging and/or processing of data in the DATR environment on the EOP premises, the DATR equipment and holdings from the EOP data center will be physically transported and relocated to the NARA ERA data center at the Allegany Ballistics Laboratory.

In preparation for the high volume and complexity of the electronic PRA records transfer, NARA also developed the ERA EOP Submission Information Package (SIP)<sup>2</sup> Ingest Process Guidelines and Governance Model to address the technical aspects of the transfer. The purpose of this document is to establish procedures and controls to ensure the timely, complete, and accurate transfer of all electronic PRA records without alteration or loss. This includes identifying the source systems for electronic PRA records, exporting them in formats compatible with the ERA EOP System, and applying archival controls to ensure the long-term preservation and accessibility of the records.

In addition, NARA had an independent vendor assess the scalability of the current system design under ingest events of 0.5, 2, and 5 petabytes<sup>3</sup> and 500 million, 1 billion, and 3 billion files, respectively. The analysis was paper-based, relying on Government Furnished Information (GFI) regarding the architecture, configuration, use, and known performance characteristics of the deployed ERA EOP System. The report<sup>4</sup> provides an assessment of the current ERA EOP System's ability to handle the significant increase in the volume of electronic records anticipated for the Obama Administration's electronic records ingest. The report states that based on the information provided for this analysis, the current ERA EOP architecture and design should be able to scale to accommodate the three proposed ingest sizing scenarios. This can be accomplished by expanding

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<sup>1</sup> Data type analysis is a set of activities executed to gain knowledge of the nature and quality of content to be archived. The knowledge acquired should be sufficient to effectively design, develop, test and execute an archival process.

<sup>2</sup> The Submission Information Package is a transfer set of content exported from a single type of information system, organized and formatted for successful archival ingest and use, according to the respective Submission Information Package Specification. A given information system may require one or more SIPs to transfer its contents, given constraints of time and volume of content.

<sup>3</sup> A petabyte is 1,000 terabytes or 1,000,000 gigabytes.

<sup>4</sup> ERA EOP System Engineering Assessment and Performance Report dated January 14, 2016.

processing and storage capacity, optimizing the alignment of system nodes to ingest data sets, improving the allocation and use of namespaces, and by looking for ways to optimize the key processes that comprise the ingest event. The report also notes that to have full confidence the system will scale as required, NARA should determine and document key performance metrics, establish a performance baseline, perform stress and volume testing, and instrument the system so its performance can be effectively monitored.

### Lack of Assurance the ERA EOP System Will Respond as Intended

Based on the planning, analyses, and actions performed to date, NARA officials are confident the ERA EOP System will be able to adequately handle the electronic records from President Obama's administration. However, NARA lacks assurance the system will respond as intended to a significant ingest. NARA expects to receive over 200 terabytes<sup>5</sup> of data from the Obama administration. This is at least 2.5 times the volume of electronic records NARA received from the prior administration.

As stated in the ERA EOP System Engineering Assessment and Performance Report, the analysis was paper-based, relying on GFI regarding the architecture, configuration, use, and known performance characteristics of the deployed ERA EOP System. The GFI and project specific working sessions provided a baseline of data and information that was transformed into several key processing metrics for performance analysis. However, due to the fact that no significant ingest has taken place since the ERA EOP upgrades, actual performance data is limited. Performing actual volume, stress or performance testing focused on the key ingest processes would increase confidence the system will perform as expected.

Although NARA has been working closely with the EOP to understand the types of data that will be transferred, there is always a possibility the transferred data may not match the samples provided or that the samples do not represent all of the possible combinations of data. NARA has not received a comprehensive inventory, or a large volume, of electronic records from the current administration to adequately test the ERA EOP system. NARA officials also do not have a timeframe for when they will receive these items. NARA has only received samples of the initial priority records types. If the data samples, and the inventory of data types and formats, are not received in a timely manner the data analysis, ingest preparation, and the SIP completions will be impacted. While we recognize many of these issues are outside of NARA's control, and the administration is not required to provide any records to NARA prior to inauguration day, NARA is not relieved of its responsibilities under the PRA. NARA may not be able to rely on the ERA EOP System to comply with the PRA. The PRA states the AOTUS has an affirmative

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<sup>5</sup> A terabyte is about 1 trillion bytes or about 1,000 gigabytes.

duty to make such records available to the public as rapidly and completely as possible consistent with the provisions of the Act, beginning five years after the President leaves office. NARA also strives to be able to respond to time-sensitive and often high-visibility special access requests for these records as soon as possible after the President leaves office. Such special access requests come from former and incumbent Presidents, the courts, and the Congress.

In addition, NARA has not developed and documented a contingency plan should the ERA EOP System fail to handle the Obama electronic records in a timely manner. As stated above, NARA officials appear confident the system will function as intended, however NARA has no control over the quality of the data samples or when the data will be transferred. Without a contingency plan in place, NARA lacks assurance it will be in compliance with the PRA, should the ERA EOP System not be able to adequately handle the volume, and/or data types and formats of electronic records from the Obama administration in a timely manner.

### **Recommendations**

We recommend the Chief Information Officer, General Counsel, and the Presidential Materials Division:

**Recommendation 1:** Continue to work with the EOP in order to obtain an inventory of data types and formats; expanded data samples; and a schedule to get the data from EOP record-producing systems that have previously seen high-access demand.

We recommend the Chief Information Officer:

**Recommendation 2:** Develop a contingency plan that could be activated to ensure responses to special access requests occur in a timely manner, in the event the ERA EOP System is not be able to comply with the PRA.

## Appendix A – Acronyms

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AOTUS	Archivist of the United States
DATR	Data Transport Hardware and Software
DoD	Department of Defense
ERA	Electronic Records Archive
EOP	Executive Office of the President
GFI	Government Furnished Information
NARA	National Archives and Records Administration
OIG	Office of Inspector General
PRA	Presidential Records Act
SIP	Submission Information Package
TWG	Technical Working Group

## Appendix B – History of NARA’s Involvement with Presidential Moves

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Before the National Archives was founded in 1934, presidential collections (which, until 1981, were the personal private property of the President) were moved in a variety of ways. Sometimes significant parts of these collections were sold or scattered. The earliest collections were quite small. When President George Washington left office, several wagons took his papers to Mount Vernon, where he could review them in his study.

NARA’s role in moving presidential collections began in 1939, when Congress accepted Franklin Delano Roosevelt’s gift, not only of land and the first presidential library building, but also of his presidential papers and other historical materials, for the establishment of the Franklin D. Roosevelt Library in Hyde Park, New York. In exchange for the gift, the National Archives, which had been established only five years earlier, agreed to staff and run the library and make these materials available to the public.

In 1955 Congress passed the Presidential Libraries Act (amended in 1986), which codified the system of presidential libraries. Today, there are 13 libraries that are part of the National Archives and administered by NARA’s Office of Presidential Libraries, from Hoover through the George W. Bush Library.

Although NARA has a presidential library for President Herbert Hoover, the National Archives was not involved in the initial move of the Hoover papers and artifacts. Hoover transferred his presidential papers to either his office at the Hoover Institution at Stanford University in California, or his New York office. In 1960 Hoover decided to deed his papers to the National Archives and the agency assisted with the move of his presidential materials from both locations to his new library in West Branch, Iowa.

The PRA of 1978 changed the legal ownership of the official records of the President and Vice President from private to public (starting in 1981 upon the inauguration of President Ronald Reagan) and defined that the AOTUS would assume the legal ownership, custody, and responsibility for these records immediately at the end of the last term of the administration.

The Reagan transition in 1989 was the first one covered by the PRA of 1978. No longer would the Archives need to wait for the President to donate his papers. Now, legal custody of the President’s records automatically transferred to NARA at noon on the last day of the administration.

## Appendix C – Synopsis of OIG Products Related to the ERA EOP System and Presidential Gifts

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- Audit of the Process of Safeguarding and Accounting for Presidential Library Artifacts, OIG Audit Report No. 08-01, dated October 26, 2007. The report identified material deficiencies in the cataloguing, storage and protection of artifacts held by NARA. The report noted that in 1998, a curatorial unit was formed and professional museum procedures were put into place to better account for Presidential gifts as they were placed into courtesy storage.
- OIG Monitoring of the Executive Office of the President System, Advisory Report No. 09-06, dated January 13, 2009. The review of the EOP System development effort revealed that due to the expected volume of electronic records from the Bush Administration, and the possibility of receiving these records in unknown or incompatible formats, NARA will not be able to rely solely on the EOP System to comply with the PRA, and will incur additional costs.
- Follow-up Review of OIG Audit Report No. 08-01: Audit of the Process of Safeguarding and Accounting for Presidential Library Artifacts, OIG Audit Report No. 12-10, dated September 13, 2012. The audit revealed opportunities exist to strengthen accountability and control over incumbent White House gifts held in courtesy storage. Specifically, multiple functional roles over the handling of White House gifts need to be segregated; email documentation from the White House records used to populate the collections database are not maintained; and policies and procedures for security escort of high-value gift pick-ups have not been established.
- Status of the Upgrade to the Electronic Records Archives Executive Office of the President System, Management Letter No. 13-02, dated October 18, 2012. The audit identified the effort to upgrade the ERA EOP System may result in significant cost increases and implementation delays. According to the Statement of Objectives in the contract to upgrade the EOP System, the EOP requires upgrades to storage capacity, hardware, and software to be ready in the event that the current Presidential administration is one term in duration, necessitating a sizeable transfer of electronic records under the PRA in January 2013. We found deliverables due in September 2012 (e.g., Project Management Plan, System Design, Software Design) had not been completed and there appears to be a disconnect between NARA and the contractor in terms of the scope of work.

- Status Update of the Electronic Records Archives Executive Office of the President System Upgrade, OIG Advisory Report No. 13-07, dated January 31, 2013. The audit found NARA did not clearly articulate all of the work required to upgrade the EOP System in the Statement of Objectives, nor did this project go through NARA's Capital Planning and Investment Control process. As a result, the value of the contract to upgrade the EOP System has increased to over \$8.1 million which is more than double the value of the original contract.



# Appendix D – Management’s Response to the Report<sup>6</sup>

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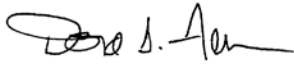


Date: April 29, 2016  
To: James Springs, Inspector General  
From: David S. Ferriero, Archivist of the United States  
Subject: *OIG Draft Audit Report 16-06, Audit of NARA’s Preparation and Planning for the Receipt of President Obama’s Administration’s Records and Artifacts*

Thank you for the opportunity to provide comments on this draft report. We appreciate your willingness to meet and clarify language in the report. We understand that, as with all audit reports, this Report, including its Executive Summary, Background, Audit Results, and Recommendations, only addresses matters up to the conclusion of the OIG’s audit field work, which ended in January 2016.

We believe that many of the concerns raised in your report and recommendations will be addressed by additional information provided by the Executive Office of the President (EOP) and steps we have taken since your audit work was concluded. We now have agreed on a schedule and will continue to receive updated inventories and even larger, expanded data samples from the EOP. We are also finalizing a contingency plan to ensure timely responses to access requests.

Accordingly, we concur with both recommendations in this audit, and we will address them further in our action plan.



DAVID S. FERRIERO  
Archivist of the United States

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<sup>6</sup> Management’s response in this report is different from the original response issued on April 14, 2016. A sentence relating to when audit field work ended is included.

## Appendix E – Report Distribution List

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Archivist of the United States  
Deputy Archivist of the United States  
Chief Operating Officer  
Chief Information Officer  
Executive for Legislative Archives, Presidential Libraries, and Museum Services  
Director, Presidential Materials Division  
Director, Office of Presidential Libraries  
General Counsel  
Audit Liaison  
Congressional Affairs