



NATIONAL
ARCHIVES

OFFICE *of* INSPECTOR GENERAL

Fiscal Year 2022

Management and Performance Challenges

November 2021



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National Archives and Records Administration

The National Archives and Records Administration (NARA) drives openness through access to records. While NARA is currently updating their Strategic Plan, NARA's mission is stated: Our mission is to provide public access to federal government records in our 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.

In fiscal year (FY) 2021, NARA was appropriated \$377 million for operating expenses, including \$9.2 million to enhance the government's ability to electronically preserve, manage, and store government records, and up to \$2 million to implement the Civil Rights Cold Case Records Collection Act of 2018; \$9.5 million for repairs and restoration of archives facilities, \$6.5 million for the NHPRC, and \$4.8 million for Inspector General (IG) operations. NARA was subsequently provided with an extra \$50 million in emergency funds to address problems caused by the coronavirus pandemic at Federal Records Centers, and to accelerate processing of requests for military service records received during the pandemic. With approximately 2,583 employees, NARA operates 44 facilities nationwide.

OIG Mission and Authority

NARA's Office of Inspector General (OIG) was formally established in April 1989. The Inspector General Act, as amended (IG Act) contained in Public Law 100-504 states the IG is responsible for conducting and supervising independent audits and investigations of agency programs and operations; promoting economy, effectiveness, and efficiency within the agency; detecting and preventing fraud, waste, mismanagement, and abuse of agency programs and operations; and making recommendations designed to promote the economy, efficiency, and effectiveness of the agency. Unique in the federal system, the IG is required to keep both the Archivist and Congress fully and currently informed about fraud and other serious problems, abuses, and deficiencies relating to NARA's programs and operations.

NARA Management and Performance Challenges for FY 2022

In executing its mission, the IG summarizes what he considers to be the most significant management and performance challenges facing the NARA and assesses the agency's progress in addressing those challenges. The following summarizes those challenges based on legislative mandates, our experience, stakeholder input, and observations from our oversight work.

1. Records Request Backlog at the National Personnel Records Center (NPRC)
2. Information Technology (IT) Security
3. Office of Management and Budget (OMB) Memorandum M-19-21, Transition to Electronic Records
4. Expanding Public Access to Records
5. Electronic Records Archives (ERA)
6. Pandemic Response

CHALLENGE 1: Records Request Backlog at National Personnel Records Center (NPRC)

One of NARA's most important responsibilities is to provide access to military service records to veterans and other stakeholders. The pandemic has had a significant, adverse impact on NPRC's performance in this regard, resulting in an unprecedented backlog of over 500,000 requests. Adding to the issue, the majority of military records are paper based, requiring on-site staff to physically retrieve and reproduce records. Pandemic-related safety measures restricted the number of staff that may occupy the facility concurrently and thus the NPRC's throughput. To provide reference to the scale of the challenge, the backlog has grown to ten times its pre-pandemic level and at full pre-pandemic staffing it would take the NPRC over four years to work through such a large volume of requests. Adding to this challenge, NPRC also has a related backlog of records to be refiled; records which have been retrieved from storage for reference purposes and must now be returned to their proper storage location.

NARA has taken actions to begin to address these issues and Congress has appropriated funds to help. While service to the Veterans Benefits Administration (VA) has been restored, the backlog of public requests continues to grow.

Completed Actions

- Built and deployed digital delivery functionality
- Upgraded eVetRecs to allow for digital signatures, electronic status checks, and submission of emergency requests
- Deployed solution for remote NPRC Call Center
- Designated NPRC staff as Critical Infrastructure to obtain priority access to vaccinations and arranged for vaccine access through the VA
- Purchased and deployed laptops and peripherals
- Temporarily established on-site scanning pods to support the remote processing of separation document requests and later transitioned this digitization work to the VA
- Developed interim solution for NPRC staff to access electronic records from VA systems
- Detailed staff from VA to NPRC
- Requested support from DoD, received funding to support the hiring of additional contractors
- Partnered with the VA to digitize the backlog of raw mail. Leveraged resources throughout NARA to enter transactions into NARA systems
- Stood up alternate site to increase capacity
- Stood up second and third shifts at the NPRC
- Worked with CDC to increase on-site capacity
- Deployed portable HEPA filtration units to support increased on-site capacity

Ongoing Actions

- Partnering with the VA to digitize service records of all living veterans, starting with those that have claims pending with the VA and/or requests pending with NPRC
- Issued Task Order to develop functionality to ingest digitized records from VA systems into CMRS and integrate them into NPRC workflow
- Developing functionality to enable in-stack digitization of records
- Reconfiguring space to support post-COVID return to the workplace
- Increasing NPRC staffing by 123 positions
- Increasing NPRC contract laborers by 100 positions
- Providing recurring updates to members of Congress and other stakeholders

CHALLENGE 2: Information Technology (IT) Security

NARA labeled IT security a “material weakness” under the Federal Managers’ Financial Integrity Act (FMFIA) from 2007 to 2020 with exceptions in 2013 and 2014, when it was considered a “reportable issue.” In FY 2021, NARA again labeled IT security a “material weakness.” Further, over the past decade annual Federal Information Security Modernization Act (FISMA) audits or assessments have consistently identified IT areas in need of significant improvement.

Many of NARA’s issues stem from control weaknesses which contribute to underdeveloped or ineffectively implemented policies and procedures. The security planning and oversight for NARA’s high value assets and classified systems is not completely effective, and puts the agency’s mission and the national security information in its custody at risk. Adding to the challenge, the CIO does not report directly to the agency head. These conditions cause or contribute to current security and performance problems, and inhibit NARA from effectively establishing a strategy for the next generation of NARA’s network.

While NARA has introduced initiatives to promote a mature program, real progress will not be made until NARA establishes an effective system of internal control for information security. NARA’s mission relies on the confidentiality, integrity, and availability of their electronic records and IT systems. NARA must ensure the security of its data and systems or risk undermining the agency’s credibility and ability to carry out its mission.

Completed Actions

- Extended Information System Security Officer (ISSO) contract to allow all classified and unclassified systems to have an assigned ISSO
- Implemented mandated security controls and configurations, where applicable, to ensure managed websites are in alignment with Binding Operational Directive 18-03 and OMB 15-13
- Ensured that all NARA staff were telework-capable

Ongoing Actions

- Developing complete system security documentation for 11 new FISMA reportable systems and update documentation for 35 existing FISMA reportable systems
- Revising vulnerability management processes to include identifying and tuning out false positives, as well as identifying configuration deviations on systems that are necessary and ensuring those are documented as part of the system security documentation

CHALLENGE 3: Office of Management and Budget (OMB)

Memorandum M-19-21, *Transition to Electronic Records*

OMB Memorandum M-19-21, *Transition to Electronic Records*, establishes new government-wide goals for electronic recordkeeping to transition to a fully electronic (paperless) government. M-19-21 directs agencies to manage *all* of their permanent records in electronic format by December 31, 2022. This represents a major transition for the entire government, and nothing short of a potential avalanche of electronic records coming towards NARA.

While the ERA system is intended to handle electronic records NARA receives, the agency also needs to ensure the proper records are in fact preserved government-wide and sent to NARA in the first place. NARA must work with federal agencies to ensure proper appraisal, scheduling, and transfer of permanent records in all formats. The major challenge is how best to accomplish this in a rapidly changing technological environment. Further, it is not currently known what amount, or exact formats, of data and electronic records will be coming to NARA. Thus it is not known whether the systems in place will be able to ingest, process, preserve, store, and provide access to this information.

NARA, and the rest of the government, is challenged with meeting the deadlines in M-19-21 while determining how best to manage electronic records and make e-government work more effectively.

Completed Actions

- Issued NARA Bulletin 2020-01, providing further guidance on M-19-21, Transition to Electronic Records
- Developed an authoritative list of federal agencies, with supporting SOPs for staff, to be used for annual agency reporting
- Distributed formal guidance to agencies requiring a review of all schedules approved before 1990 to ensure these schedules are accurate
- Developed a new semi-annual report of NARA's records management oversight activities that identifies best practices, lessons learned, and recommendations for executive action for NARA and all federal agencies
- Updated electronic tools to more accurately reflect all known active permanent electronic schedules, allowing identification of records overdue for transfer to NARA and updated internal controls to reflect an approach to contacting agencies with overdue records
- Established an accessioning branch within the Electronic Records Division

Ongoing Actions

- Finalizing digitization standards for permanent records
- Implementing electronic system audits of agency systems to ensure they are compliant with NARA's recordkeeping requirements
- Considering options to account for pandemic-related delays to implementation by agencies to M-19-21

CHALLENGE 4: Expanding Public Access to Records

Records that cannot be accessed simply cannot be used, and the public expects more and more records to be easily accessible online. NARA's strategic goal to "Make Access Happen" affirms public access as NARA's core purpose, and NARA has committed to digitize the nation's archives and make them available online. This goal is a massive undertaking involving billions of pages, films and photographic media, and other records. However, NARA's historic digitization approaches were not large enough to make significant progress. For example, insufficient planning and system limitations kept millions of records digitized by NARA partners from being made accessible to the public in an efficient and timely manner. NARA must ensure the appropriate management, controls, and resources are in place to successfully implement an effective digitization strategy and expand public access to records.

At a basic level, in order to "Make Access Happen" NARA must gain physical and intellectual control over its holdings. That is, NARA must physically control the records and know what they are. This initial step is referred to as archival processing. However, 11% of NARA's analog holdings have not been processed, so the public does not have efficient and effective access to them. Thus, the agency has begun an initiative to accelerate archival processing to increase the records available for research. 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. In addition, the transition of federal record-keeping to a fully-electronic environment will present additional challenges to making records accessible to the public. This work includes standardizing processing procedures across the agency, strengthening internal controls, and monitoring performance.

Completed Actions

- Processed over 89% of traditional holdings
- Developed methodology for prioritizing processing the most used/requested holdings
- Developed and implemented a plan to improve rates of processing at Archives II and updated policies and procedures covering quality controls, timeliness reviews, and reporting
- Reorganized the accessioning and basic processing functions at Archives II
- Established separate working groups within the Office of Legislative Archives, Presidential Libraries, and Museum Services Office of Presidential Libraries related to analog processing issues
- Established the Archival Operations Division (LA), responsible for ensuring consistency in the application of processing standards and measurements across Library custodial units
- Improved tracking of partner digitization efforts
- Developed and implemented NARA 1550, Digitization of Archival Holdings

Ongoing Actions

- Office of Innovation and Office of Information Services is continuing to consider improvements to both NARA's Description & Authority Services and the Catalog to ensure the systems can scale and perform to meet NARA's strategic goals

CHALLENGE 5: Electronic Records Archives (ERA)

Electronic records are the future of government archiving, and NARA must become a world leader in preserving, storing, and presenting electronic records to meet its mission. NARA’s plan to address this is the ERA system. Initially billed as a solution for storing files in any format for indefinite future access, the program has experienced delays, cost overruns, funding shortfalls, and technical short-comings virtually since inception. As a result, many core requirements from initial plans have never been addressed, and ERA does not have the capabilities originally envisioned. Further, stakeholders expect more capabilities, such as online access and searching, that drive openness and cultivate public participation.

ERA has become a “system of systems,” and the original ERA Base System was not capable of meeting the nation’s needs. Thus NARA is developing ERA 2.0, with an estimated lifecycle cost of \$86 million. Yet the ERA 2.0 timeline continues to slip, and a version for classified records is not expected until at least FY 2024. Some components of ERA 2.0 have been put into production and are used by some NARA staff who work with digital materials. However, until ERA 2.0’s functionality is built and put into full production, the current ERA’s longstanding deficiencies may continue to impact NARA.

Additionally, the vast volumes of electronic records that will need to be preserved are simply staggering, and NARA is challenged to meet data storage requirements for them. NARA’s in-house data storage is reaching capacity, impacting the agency’s digitization efforts and other IT programs. Without sufficient storage, NARA would have difficulty accepting, storing, and processing electronic records or make them available to the public.

ERA impacts other NARA programs. For example, the physical media that electronic and audiovisual records are stored on age and degrade every day. As computer programs become obsolete, records stored in those formats may become impossible to use. NARA cannot provide access to records unless it can preserve them for as long as needed. ERA was initially envisioned to address these preservation issues, but currently does not provide a complete solution. Without action, pieces of the unique history of America may be lost.

Completed Actions

- Development of scheduling and transfer capabilities
- Migration of record material and metadata from ERA base into ERA 2.0
- Developed a space management strategy encompassing five key areas to address long-term space management needs in line with NARA’s Strategic Plan

Ongoing Actions

- Continuing to migrate of business objects from ERA base to ERA 2.0
- Introducing ERA 2.0 to federal agencies and decommission of ERA base
- Developing support for low-cost storage classes for records ingested into ERA 2.0
- Planning to implement Access Review and Redaction capabilities in ERA 2.0, integration with NARA’s Description & Authority Services, and taking on other initiatives designed to integrate ERA 2.0 into NARA’s IT infrastructure

CHALLENGE 6: Pandemic Response

The COVID-19 pandemic has affected government operations more than any other singular event in our workforce's lifetime. As the terrible spread of the Delta variant has shown, the pandemic's effects on how we work has not yet passed. Like all employers, NARA is challenged to determine the best path forward during this pandemic. NARA is made up of a diverse group of professionals, with differing work requirements. For example, there are multiple positions that require in-office work. A preservationist cannot take priceless relics of our history home to work on preserving them. Those scouring the stacks to provide researchers the records they need cannot find those records from a home office. In this environment, telework and the safety of the office are at the forefront of many people's minds. Yet there are no simple solutions or basic formulas which can be mechanically applied. NARA must make tough choices and lead.

To date NARA has been clear, the health and wellbeing of staff is the agency's paramount concern. However, as the pandemic drags from months to years, NARA still has a mission to accomplish. The pandemic has closed many of NARA's facilities, and many research rooms remain empty. Those research rooms that are open are open on a limited basis and by appointment only. Some museums have reopened, but with limited hours and timed tickets. How these adaptations serve NARA's stakeholders is not entirely known. Some changes may improve operations and become permanent, while others may not fill the community's needs. NARA is challenged to both keep agency staff safe, and still meet NARA's mission. These are times of near unprecedented change, presenting both opportunities and new challenges. To succeed NARA must seize the opportunities, potentially changing long-held beliefs and processes, and overcome the challenges. No less than the history of this great republic hangs in the balance.

Completed Actions

- Established a senior-level working group to guide agency decision-making consisting
- Established a standardized means to gather and use public health data to make data-driven decisions concerning regression and progression of facilities and work
- Developed and implemented numerous policies and procedures to comply with guidance provided to federal agencies. Adjusted those continually based on lessons-learned and revised guidance
- Developed initial reopening plans for research rooms and museums, tested initial plans with limited reopenings and pilots, and revised initial plans based on our experiences and feedback from staff, visitors, and researchers
- Assessed major program areas to identify and track backlogs that had developed during the pandemic

Ongoing Actions

- Implementing NARA's approved reentry and post-reentry plan in accordance with changes in the public health data at the locations where NARA has facilities
- Assessing backlogs, developing means to address them, and tracking progress
- Continually reviewing priorities, policies, and procedures and adjusting them based on best practices, lesson-learned, and feedback
- Communicating regularly with staff, stakeholders, and customers
- Holding agency-wide, all-hands to share information
- Weekly meetings with Designated Officials at all of NARA's facilities
- Coordinating weekly with AFGE Council 260

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 emails through the Hotline email system and an online referral form. Walk-ins are always welcome. Visit www.archives.gov/oig/ for more information, or contact us:

By telephone

Washington, DC, Metro area: 301- 837-3500
Toll-free: 800-786-2551

By mail

NARA OIG Hotline
P.O. Box 1821
Hyattsville, MD 20788-0821

By email

oit.hotline@nara.gov

By facsimile

301-837-3197

By online referral form

www.archives.gov/oig/referral-form/index.html

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 www.archives.gov/oig/contractor-form/index.html.