



NATIONAL
ARCHIVES

OFFICE *of* INSPECTOR GENERAL

Fiscal Year 2023

Management and Performance Challenges

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National Archives and Records Administration

NARA drives openness through access to records. NARA's mission is stated as:

Our mission is to provide equitable public access to federal government records in our custody and control. Equitable access to government records strengthens democracy by allowing all Americans of all backgrounds to claim their rights of citizenship, hold their government accountable, and understand their history so they can participate more effectively in their government.

In FY 2023, NARA was appropriated \$388.3 million for operating expenses, including \$29 million for expenses necessary to enhance the federal government's ability to electronically preserve, manage, and store government records, and \$2 million to implement the Civil Rights Cold Case Records Collection Act; \$71 million for Repairs and Restoration, including \$20 million for the Ulysses S. Grant Presidential Library in Starkville, Mississippi, and \$11.5 million for the Harry S. Truman Library Institute for National and International Affairs in Kansas City, Missouri; \$12.3 million for National Historical Publications Records Commission grants; and \$5 million for IG operations. With approximately 2,556 employees, NARA operates 44 facilities nationwide.

OIG Mission and Authority

NARA's OIG was formally established in April 1989. The Inspector General Act, as amended (IG Act) 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 2023

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. OMB Memorandum M-19-21, Transition to Electronic Records
4. Expanding Public Access to Records
5. Electronic Records Archives
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 peaked at over 600,000 requests in 2022. Since then, NPRC has made significant progress, particularly with regard to requests for separation documents (documents most often needed by veterans to obtain benefits). The overall backlog has been reduced to 430,000 requests, and service on routine requests for separation documents has been restored to its pre-pandemic level, with a median response time of five workdays. Service to the VA has long been restored to its pre-pandemic level, with most VA requests serviced in four workdays or less. Significant progress has also been made on the digitization of NPRC holdings and improvements to NPRC systems to facilitate the electronic servicing of requests. Despite this progress, the backlog remains a significant challenge. The remaining portion of the backlog includes reference transactions that are complex and involve extensive redactions of personal privacy information and other actions beyond a simple record reproduction. Furthermore, recent legislative actions, including the Honoring our Pact Act and Camp Lejeune Justice Act, are leading to an increase in demand for records from NPRC holdings. NPRC has relied heavily on contract labor support throughout the pandemic and is currently taking action to bring in additional contractors to support backlog reduction. It estimates it will take six months to achieve full staffing and one year of operating at full staffing to resolve the entire backlog.

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
- Deployed functionality to ingest digital records from the VA into NPRC's production system and make them available to NPRC technicians
- Deployed redesigned digital delivery framework to support increased throughput
- Restored service to VBA to pre-pandemic level
- Restored service on requests for separation documents to pre-pandemic level
- Cloud based Virtual Desktop Infrastructure (VDI) solution was delivered to allow on-site and remote workers to access the VA's newly digitized records securely using a PIV card
- Updated existing S3 bucket policy to enable access for onsite CMRS users to access newly digitized VA records

Ongoing Actions

- Partnering with the VA to digitize NPRC holdings
- Increasing capacity of labor through traditional staffing, internships, and expansion of contract labor
- Reconfiguration of space to support larger staff
- Improving network infrastructure to increase capacity for digital reference transactions
- Developing a new Case Management and Reporting System
- Providing recurring updates to members of Congress and other stakeholders
- Continuing to operate second and third shifts and overtime on weekdays, weekends, and selected holidays
- Exploring opportunities to reduce time to process veteran's records via Robotic Process automation (RPA)

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, potentially putting the agency’s mission and national security information at risk. Adding to the challenge, the CIO does not report directly to the agency head. These conditions inhibit NARA from effectively establishing a strategy for the next generation of NARA’s network.

NARA has introduced initiatives to promote a mature program, and has made progress. However, NARA needs to establish an effective system of internal control for information security. NARA must ensure the security of its data and systems or risk undermining the agency’s credibility and ability to meet its mission.

Completed Actions

- Completed development of security documentation for all major FISMA reportable and classified systems. Completed security assessment and authorization for 94% of FISMA systems
- Implemented revised vulnerability management procedures to be in alignment with Binding Operational Directive 22-01, Reducing the Significant Risk of Known Exploited Vulnerabilities
- Deployed CISA Continuous Diagnostics and Mitigation Tools (CDM) and established and Endpoint Detection and Response capability
- Published new Cybersecurity Handbooks
- Developed a new configuration management plan
- Developed and implemented a new and automated process for user account reviews
- Established a direct reporting relationship for the CIO to the agency head through multiple channels, including the agency’s Executive Leadership Team, Management Team, and breach response team. Ensured that the CIO has ready access to the agency head at all times.

Ongoing Actions

- Continue to implement requirements and meet the milestones of Executive Order 14028 (Improving the Nation’s Cybersecurity), OMB Memorandum 22-09 (Federal Zero Trust Strategy), and OMB Memorandum 21-31 (Improving the Federal Government’s Investigative and Remediation Capabilities Related to Cybersecurity Incidents)
- Continue efforts to further improve vulnerability and patch management processes
- Improve hardware and software inventory processes and continue to identify and further secure critical software in accordance with OMB Memorandum 21-30.
- Develop and implement supply chain risk management processes in accordance with OMB Memorandum 22-18
- Implement PIV mandatory authentication for user access to NARA systems
- Deploy a privileged access management (PAM) solution for NARA
- Continue work to assess and authorize NARA classified systems
- Complete Digital Identity Risk Assessments (DIRAs) for NARA systems

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
- Implementing a process to adjudicate agency-submitted exceptions to M-19-21 requirements consistent with NARA Bulletin 2020-01
- Developing a final rule with standards for the digitization of permanent records to support the M-19-21 goal of managing all records electronically

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 these 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 in Research Services and updated policies and procedures
- Reorganized Research Services' accessioning and basic processing functions
- Established a division responsible for ensuring consistency in the application of processing standards and measurements across Library units
- Improved tracking of partner digitization efforts
- Developed and implemented NARA 1550, Digitization of Archival Holdings
- Launched new National Archives Catalog
- Legislative Archives, Presidential Libraries, & Museum Services issued Finalized Guidance on Processing Analog Holdings in 2021
- Issued a Comprehensive Report template that includes a newly organized means of capturing data on basic and augmented processing

Ongoing Actions

- Office of Innovation and Information Services are continuing to consider improvements to both NARA's Description & Authority Services (DAS) and the Catalog to ensure the systems can scale and perform to meet NARA's strategic goals
- Office of Innovation and Information Services have a Next Generation DAS development project underway
- Office of Innovation introduced cloud to cloud transfer of digitization partnership content
- Legislative Archives, Presidential Libraries, & Museum Services appointed four representatives on the Reproductive Description and Digitization Working Group (RDDWG), which is working to expand public access to previously under-described and undigitized records that meet the needs of underserved and underrepresented communities
- Building a Mass Digitization Facility at Archives II

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 support for low-cost storage classes for records ingested into ERA 2.0
- Completed first pilot file transfer from an external agency’s cloud storage to NARA cloud storage
- Migrated business objects from ERA base to ERA 2.0

Ongoing Actions

- Introducing ERA 2.0 to Federal agencies and decommission of ERA base
- Developing procedures for internal cloud-to-cloud transfers of digital files
- Planning to implement Access Review and Redaction capabilities in ERA 2.0, integration with NARA’s Description & Authority Services, and taking on other initiatives
- Developing acceptable format guidelines, updating digital transfer guidance, and the digital preservation framework

ingest of the remaining holdings uniquely held on physical media to ERA 2.0 in FY 2023

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 must 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 closed many of NARA's facilities, but they have been reopened. How NARA's adaptations serve 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 recorded 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.
- Safely reopened in-person services to the public based on science, experiences gained during test pilots, and feedback from staff, visitors, and researchers.
- Assessed major program areas to identify and track backlogs that had developed during the pandemic and completely eliminated backlogs in some key areas.

Ongoing Actions

- Continuously monitors public health data at the locations where NARA has facilities and adjusts workplace safety protocols when local conditions change.
- Directed additional resources and management attention to address remaining backlogs.
- 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.

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 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.