



OFFICE *of* INSPECTOR GENERAL

SEMIANNUAL REPORT

to **CONGRESS**

APRIL 1, 2017 *to* SEPTEMBER 30, 2017



FOREWORD

I am pleased to present this Semiannual Report to Congress covering the oversight activities of the Office of Inspector General (OIG) for the National Archives and Records Administration from April 1, 2017 to September 30, 2017. The audits, investigations, and other products described in this report illustrate the OIG's continual efforts to promote efficiency and effectiveness, and demonstrate the impact our work has had on the agency's programs and operations.

NARA continues to face many critical challenges, making it difficult for the agency to meet its first strategic goal of "Make Access Happen." NARA's most significant challenges are detailed in the "Top Ten Management Challenges" section of this report. NARA's ability to meet its mission is made even more difficult by the current climate in government, where federal dollars are shrinking and responsibilities do not. As a result, it is incumbent on the agency as well as the OIG ensure the public's funds are spent economically and efficiently, and programs and operations are efficient and effective.

The OIG is up to this task, and we stand ready to assist the agency by providing quality oversight and analysis. For example, the OIG Office of Audits has recently developed and issued to management the OIG Annual Audit Plan. This plan identifies critical aspects of NARA's programs and operations which we plan to audit. Through audits and other products we strive to determine whether NARA programs and operations are economical, efficient and effective; and how they may be improved. Moreover, the OIG Office of Investigations has refined their assessment program, developing new assessments and other products which can review NARA programs for the likelihood of fraud, waste, and abuse.

Finally, the OIG continues our dedication to transparency. This period we participated in the launch of oversight.gov, a single website for the public to search the latest public reports from Inspectors General from across the Federal government. We added audits and previous semiannual reports to congress to this repository to improve the public's access to independent and authoritative information about NARA.

I continue to be extremely proud of the hard work and dedication of my staff, and commend their efforts. I am also appreciative of management's efforts to assist the OIG in completion of our audit and investigative efforts.



James Springs
Inspector General

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

EXECUTIVE SUMMARY

This is the 58th Semiannual Report to Congress summarizing the activities and accomplishments of the National Archives and Records Administration (NARA) Office of Inspector General (OIG).

Audits and Reports

The OIG continued to assess the economy and efficiency of NARA's programs and operations, and to examine NARA's Information Technology (IT) systems, including the Electronic Records Archives (ERA). During the reporting period, the OIG issued the following audits and other non-audit reports, including a management letter. Each report portrays a snapshot in time at the end of the fieldwork, and may not reflect the current situation at the end of the reporting period. Only products labeled as audits are conducted in accordance with the Government Auditing Standards.

Audits of Programs and Operations

- **Audit of NARA's Online Access to Digitized Holdings.** Although NARA has made progress in making its digitized holdings available via the National Archives Catalog (NAC) through improved controls, there are still millions of digitized holdings that need to be placed on the NAC which have not yet been made publicly accessible. We attribute this condition to inadequate system performance, incompatible partner digitized holdings, inadequate planning and goal setting, and a lack of resources. As a result, the American public has been unable to access the full extent of NARA's digitized holdings online through the NAC. (OIG Audit Report No. 17-AUD-12, dated June 19, 2017. See page 12.)
- **Audit of NARA's Electronic Records Archives 2.0 Project.** NARA has spent over \$24 million and 3.5 years developing solutions to correct deficiencies in the Electronic Records Archives (ERA) Base System, many of which still remain. Further, we found the ERA 2.0 project continues to experience a number of challenges to include funding and aligning the project to NARA's System Development Life Cycle policy. This is an on-going development effort with initial implementation of two modules (Digital Processing Environment and Digital Object Repository) planned for April/May 2018. As of April 7, 2017, 53 percent of the user stories/requirements were completed, while the majority of the remaining ones were deemed low priority. The ERA 2.0 Project Plan also includes subsuming legacy systems over fiscal years (FY) 2018 – 2020 and deploying a classified ERA 2.0 in FY 2020. Until the ERA 2.0 functionality is tested and implemented into the production system, longstanding deficiencies may continue to impact the ERA Base System. (OIG Audit Report No. 17-AUD-15, dated August 16, 2017. See page 12.)
- **Audit of NARA's Freedom of Information Act Program.** NARA's Freedom of Information Act Program (FOIA) program needs strengthening to ensure it can effectively and efficiently meet its reporting goals and the statutory requirements for timeliness. NARA lacks a centralized FOIA program that has agency-wide responsibility for FOIA compliance and performance, to include developing agency-wide policies and procedures, implementing FOIA initiatives and corrective action plans, and providing

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training to staff. NARA's current FOIA program is highly decentralized, with different components providing separate policies and procedures, guidance, responses, and using separate information technology systems that do not interface. Without adequate management controls, and proper structuring, NARA's FOIA program may continue to face significant backlogs (which was over 4,100 FOIA requests during fieldwork) and an added risk of FOIA litigation expenses. (OIG Audit Report No. 17-AUD-16, dated September 27, 2017. See page 13.)

- **Audit of NARA's FY 2016 Compliance with Improper Payment Requirements.** NARA is compliant with improper payment requirements. Specifically, NARA was fully compliant with Improper Payments Elimination and Recovery Act of 2010 (IPERA) requirements to report information on improper payments to the President and Congress through their annual Performance and Accountability Reports or Agency Financial Reports, and conduct program specific risk assessments. We also found NARA's reporting on improper payments (reporting on IPERA and the Do Not Pay Initiative) was accurate and complete. (OIG Audit Report No. 17-AUD-13, dated April 26, 2017. See page 14.)

Other Reports Concerning NARA Programs and Operations

- **Review of the NARA's Readiness to Implement the Digital Accountability and Transparency Act of 2014.** NARA had not formally documented, or only partially documented, some of the first four steps in the Digital Accountability and Transparency (DATA) Act Readiness Review Guide. However, the agency, in conjunction with the Administrative Resource Center (ARC) had executed its implementation plan and certified its FY 2017 Quarter 2 data submission. NARA explained that formally documenting was challenging due to the evolving nature of the requirements and the real time requirement to implement the plan. Not formally documenting the executed steps in the Playbook and NARA's relevant activities with ARC could potentially result in inconsistent implementation and execution in the future, lost institutional knowledge, and delays caused by potential misunderstanding between NARA and ARC. (OIG Report No. 17-R-14, dated June 16, 2017. See page 15.)
- **Management Letter: Building Issues at the Washington National Records Center.** This report alert NARA to issues, some of which had been categorized as "Life Safety" issues, with the facility at the Washington National Records Center (WNRC) which NARA leases from the General Services Administration (GSA) in Suitland, MD. According to WNRC staff, the myriad of nagging facility issues and broken equipment resulting from years of neglect and inattention have caused endless frustration and significant morale problems with staff and other impacts to NARA's operations and mission. Historic issues with water damaging records have plagued the facility. Further, electrical malfunctions, including a fire, have highlighted the overarching risk to NARA's holdings. NARA and GSA appear to have begun taking some steps to begin addressing these issues. However, NARA must be extra vigilant to ensure the facility is finally attended to, and is not once again neglected as in years past. As some of these

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issues were identified as life safety issues, we referred this to the GSA OIG. (OIG Management Letter No. 17-ML-17, dated September 22, 2017. See page 15.)

Management Assistance and Other Work

In addition to audits and investigations, the OIG continued to assist NARA and others in various ways, including the following highlights from the period.

- Continued running the Whistleblower Ombudsman program, providing training and information to potential whistleblowers on various rules and protections available. This work included one-on-one consultations with individuals, meeting with the Senate Whistleblower Caucus, and providing in person training at NARA's facility in Seattle, WA.
- Responded or worked on multiple requests for OIG records under the Freedom of Information Act (FOIA), including large-scale requests for large amounts of records relating to various criminal investigations.
- Provided substantial suggestions for improving NARA 1608, NARA's Privacy Program, dealing mainly with NARA's handling of PII.
- Responded to 31 requests from NARA for reviews of proposed legislation, Office of Management and Budget (OMB) regulations, congressional testimony, and other items.



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Investigations

The Office of Investigations (OI) receives and evaluates complaints, and conducts investigations related to fraud, waste, and abuse in NARA programs and operations. This includes identifying and recovering wrongfully alienated NARA holdings. Investigations showing violations of law, regulations, rules, or contract terms may result in administrative, civil, or criminal actions. These can include terminations, debarments, prison terms, probation, fines, restitution, and other actions. The OI may also conduct assessments of areas with the potential for fraud, or issue management letters detailing specific issues or vulnerabilities we observe. Assessments are typically not designed to be in-depth, detailed accounts, and are used to alert management to issues. Accordingly, they do not follow any set standards or procedures.

In this period the OI received and reviewed 169 complaints and other intake actions, opened 14 new investigations, and closed 16 existing investigations.

Highlights for this reporting period include:

- 81 percent of our closed or completed investigations resulted in referrals for criminal, civil, and/or administrative action.
- Approximately 19 percent of the investigative matters reviewed involved allegations of inappropriate use of information technology resources. NARA is working with the OI to develop strategies to deter future violations.
- The OI recovered a historically significant 1859 Civil War era letter which was stolen over a decade ago. Captain Lewis Armistead, later a Brigadier General in the Confederate Army, wrote the letter which had been sold at a 1999 auction for \$17,250.
- OI agents recovered six WWII dog tags and other documents alleged to have been stolen from NARA.
- OI agents recovered two NARA iPads.
- OI agents investigated and established that a NARA employee solicited prostitutes in a Government funded hotel room.
- OI agents conducted two investigations involving senior NARA officials.

INTRODUCTION

About the National Archives and Records Administration

Mission

The National Archives and Records Administration (NARA) drives openness, cultivates public participation, and strengthens our nation's democracy through public access to high-value government records. Simply put, NARA's mission is to preserve and provide public access to Federal records in its custody and control. Public access to these records strengthens democracy by allowing Americans to claim their rights of citizenship, hold their government accountable, and understand their history in order to participate more effectively in government.

Background

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

Federal records reflect and document America's development over more than two centuries. They are great in number, diverse in character, and rich in information. NARA holds over five million cubic feet of traditional records. These holdings include, among other things, letters, reports, architectural/engineering drawings, maps and charts; moving images and sound recordings; and photographic images. Additionally, NARA maintains nearly 700,000 artifacts and approximately 794 terabytes of electronic records. The number of records born and stored solely in the electronic world will only continue to grow; thus NARA developed the Electronic Record Archives to attempt to address this burgeoning issue.

NARA involves millions of people in its public programs, including exhibitions, tours, educational programs, film series, and genealogical workshops. In fiscal year (FY) 2017, NARA had over 58 million online visits in addition to hosting 6.1 million traditional visitors, all while responding to more than 1.2 million written requests from the public. NARA also publishes the *Federal Register* and other legal and reference documents, forming a vital link between the Federal Government and those affected by its regulations and actions. Through the National Historical Publications and Records Commission, NARA helps preserve and publish non-Federal historical documents that also constitute an important part of our national heritage. Additionally, NARA administers 14 Presidential libraries preserving the papers and other historical materials of all past Presidents since Herbert Hoover.

Resources

In FY 2017, NARA was appropriated \$399 million, including \$381 million for operating expenses, \$7.5 million for repairs and restoration of NARA-owned buildings, \$6 million for the National Historical Publications and Records Commission (NHPRC), and \$4.8 million for IG operations. With approximately 2,856 full-time equivalents (FTEs), NARA operates 44 facilities nationwide.

INTRODUCTION

About the Office of Inspector General (OIG)

The OIG Mission

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

Background

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

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

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

Resources

In FY 2017, Congress provided \$4.8 million for the OIG's appropriation, including authorization for 24 FTEs. During this period selections were made for an auditor position. Currently the OIG has 19 FTEs on board, including an Inspector General, nine FTEs devoted to audits, seven FTEs devoted to investigations, an administrative assistant, and a counsel to the Inspector General.

ACTIVITIES

Involvement in the Inspector General Community

Council of Inspectors General on Integrity and Efficiency (CIGIE)

CIGIE is an independent entity within the executive branch created to address integrity, economy, and effectiveness issues that transcend individual agencies and aid in establishing a professional, well-trained, and highly skilled workforce in the Federal OIGs. The Inspector General is a CIGIE member, and regularly attends meetings discussing government-wide issues and congressional items affecting the Inspector General community.

CIGIE Legislation Committee

The Legislation Committee provides timely information about congressional initiatives to the IG community; solicits the views and concerns of the community in response to legislative initiatives and congressional requests; and presents views and recommendations to congressional committees and staff, the Government Accountability Office, and the Office of Management and Budget on issues and legislation affecting the IG community. The OIG counsel attends committee meetings for the IG, who serves as a member. Counsel remains involved in various aspects of the committee's work including assisting in creating CIGIE's legislative priorities; answering various data calls; monitoring legislation for developments of interest to the community; and developing input for proposed legislative actions.

CIGIE Audit Committee

The Audit Committee provides leadership to, and serves as a resource for, the Federal IG audit community. Specifically, the Audit Committee sponsors and coordinates audit-related activities addressing multi-agency or government-wide issues, maintains professional standards for OIG audit activities, and administers the audit peer review program. The Audit Committee also provides input to the CIGIE Professional Development Committee on training and development needs of the CIGIE audit community, and gives advice to the Chairperson, Vice Chairperson, and Executive Director regarding CIGIE's contracts for audit services. The AIGA attends committee meetings for the Inspector General, who serves as a committee member.

CIGIE Investigations Committee

The Investigations Committee advises the community on issues involving criminal investigations and investigative personnel. The committee also works on establishing criminal investigative guidelines. The AIGI attends these meetings for the Inspector General, who is a member. The AIGI is involved in helping provide guidance, assistance, and support to the Investigations Committee in the performance of its duties.

Council of Counsels to Inspectors General (CCIG)

The OIG counsel currently serves as a vice chair of the CCIG. The CCIG provides a rich environment wherein legal issues can be raised and interpretations can be presented and reviewed with an experienced network of OIG lawyers from across the Federal community.

CIGIE Training Institute

The OIG counsel continued to work with the CIGIE Training Institute. In this period OIG counsel worked closely with other instructors and CIGIE staff to completely revise and update

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the structure, presentation, and content of the Inspector General Authorities course. Further, counsel worked with the Training Institute to develop a course for new IGs on IG authorities.

Whistleblower Ombudsman Working Group (WOWG)

In accordance with the spirit of the Whistleblower Protection Enhancement Act of 2013, the IG appointed the OIG counsel as the whistleblower ombudsman. Counsel meets with the WOWG to develop best practices, discuss community-wide issues, and learn about training programs.

CIGIE IT Committee Data Analytics Working Group (DAWG)

The OI regularly attends and participates in the DAWG. The DAWG was created to assist IGs in acquiring tools and knowledge to better assess fraud, waste, and abuse within agency programs.

Oversight.gov Information Sharing

The OIG participated in the launch of oversight.gov, a CIGIE driven single source portal to search through reports of multiple OIGs. The OIG uploaded audit reports and previous Semiannual Reports to Congress.

Peer Review Information

Peer Review of NARA OIG's Audit Organization

The most recent peer review of the NARA OIG audit function was performed by the National Labor Relations Board (NRLB). In its report issued March 15, 2017, the NARA OIG received a peer review rating of pass for its system of quality control for FY 2016. The next peer review of the OIG's audit function is scheduled for FY 2019.

Peer Review of NARA OIG's Office of Investigations

As previously reported, in January 2016 a team of special agents from the Treasury OIG conducted a comprehensive, multi-day, review of the Office of Investigations' operations in accordance with CIGIE's current "Quality Standards for Investigations." On February 1, 2016, Treasury's team found our system of internal safeguards and management procedures for investigations to be in full compliance with all applicable guidelines and regulations. There are no outstanding recommendations from this review.

NARA OIG Peer Review of Other OIGs

The NARA OIG Office of Audits conducted a peer review of the Export-Import Bank (EXIM) of the United States for the period ending March 31, 2017. In this report, issued on September 8, 2017, the EXIM audit organization received a rating of pass for its system of quality control.

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Response to Congressional Items

In addition to communicating and meeting with congressional staff over the period to keep Congress informed about agency and OIG activities, the OIG responded to the following items:

Request from the Senate Homeland Security and Governmental Affairs Committee

The OIG responded to an information request from the Senate Homeland Security and Government Affairs Committee (HSGAC) asking for the OIG's opinion on the necessity of mandatory reporting requirements.

Potential Changes to the Federal Records Act and Presidential Records Act

The OIG met with several staffers discussing how potential changes to the Federal Records Act and Presidential Records Act might affect OIG operations.

Potential Reporting Requirements Concerning Classified Information

The OIG discussed a potential reporting requirement concerning classified information with Congressional staffers to explain how the potential requirement might affect OIG operations.

Request for Information

The OIG responded to a request from a Congressional staffer for reports concerning various performance management topics.



AUDITS AND REPORTS

Audit and Reports Overview

During this reporting period, the OIG issued four final audits, and two other reports. These other reports include such things as Management Letters (which are less detailed alerts to management about issues which should not wait for, or do not warrant, an actual audit) and do not follow the Government Auditing Standards. The information below is based on results at the conclusion of field work, as depicted in the final reports. It is possible that NARA may have made improvements and/or addressed some of the issues after such time.

Additionally, we initiated or continued work on the following audits or other non-audit reports:

- The Office of the Federal Register's Administration of the Electoral College Process, determining whether the Office of the Federal Register implemented proper controls for the administration of the Electoral College process including properly maintaining records from the process.
- NARA's Oversight and Management of Contracts, determining whether NARA provides effective oversight and management of its contracts. This includes determining whether NARA can demonstrate monitoring contractor performance according to federal requirements and guidance, NARA policies and procedures, and the terms of the contract.
- NARA's Processing of Textual Records, determining whether weaknesses identified in the Audit of Processing of Textual Records (OIG Audit Report No. 13-14, dated September 18, 2013) still exist and internal controls are adequate to meet the mission of processing textual records. Also, we will evaluate the impact of digitization on processing.
- NARA's Continuity of Operations Readiness, determining whether NARA is appropriately prepared (i.e., has documented policies/procedures, personnel, technology, failover/redundancy location(s), and training) to continue its mission-essential functions in case of a contingency.
- The Digital Accountability and Transparency Act of 2014 (DATA Act), assessing the completeness, timeliness, quality, and accuracy of second-quarter FY 2017 financial and award data submitted for publication on USASpending.gov; and NARA's implementation and use of the Government-wide financial data standards established by OMB and Treasury.
- NARA's Purchase Card Program, including the CIGIE Purchase Card Project, determining whether internal controls for NARA's Purchase Card Program (PCP) are adequately designed and appropriately implemented to effectively deter fraud, waste, and abuse; the PCP has effective oversight and management; and the PCP is operating in compliance with applicable laws, regulations, and agency policies.
- NARA's Legacy Systems, determining NARA's use and maintenance of legacy systems.
- OIG Evaluation of NARA's Compliance with FISMA.
- Audit of NARA's 2017 Consolidated Financial Statements.

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Audit Summaries

Audit of NARA's Online Access to Digitized Holdings

NARA's Strategic Plan established access as the agency's core purpose. Specifically, the plan contains the strategic initiative for NARA to make all records available to the public in digital form to ensure that anyone can explore, discover, and learn from NARA holdings. The audit objective was to evaluate NARA's controls in place to achieve its Strategic Goal of "Make Access Happen" by providing online access to its digitized holdings through the National Archives Catalog (NAC). Public access to records allows Americans to claim their rights of citizenship, hold their government accountable, and understand their history so they can participate more effectively in their government.

Although NARA has made progress in making its digitized holdings available via the NAC through improved controls, there are still millions of digitized holdings that need to be placed on the NAC which have not yet been made publicly accessible. We attribute these conditions to inadequate system performance, incompatible partner digitized holdings, inadequate planning and goal setting, and a lack of resources. As a result, the American public has been unable to access the full extent of NARA's digitized holdings online through the NAC. NARA's inability to make accessible online the full extent of its digitized holdings affected the agency's ability to serve its core purpose and meet the initiatives of its strategic plan.

We also found NARA's Performance Measurement and Reporting System (PMRS), NARA's formal mechanism for reporting metrics for online access to digitized holdings, was inaccurate. Specifically, it indicated more than triple the actual amount of digitized holdings available. The reporting mistake resulted from a calculation error within the metric from the source data provided. We notified NARA of this reporting error, but had NARA relied upon the PMRS metric for reporting purposes, it would have significantly overstated actual progress.

The report made eight recommendations to further NARA's achievement of its strategic goal to Make Access Happen. The recommendations instruct NARA to make the necessary resource commitment to providing access to its digitized holdings via the NAC, realize current and future cost savings, and revise its internal reporting metric concerning online access to digitized holdings. (OIG Audit Report No. 17-AUD-12, dated June 19, 2017)

Audit of NARA's Electronic Records Archives 2.0 Project

Under the Federal Records Act, NARA is given general oversight responsibilities for records management. NARA built the Electronic Records Archives (ERA) to fulfill its mission in the digital age: to safeguard and preserve the records of our government; and ensure people can discover, use, and learn from this documentary heritage. However, the ERA has proven to be limited in meeting NARA's needs. The ERA Base System is the part of the ERA system used by Federal agencies. Given the limitations of the system in managing the transfer, processing, and storage of large transfers of digital materials, NARA has determined it is essential to evolve the current ERA Base System for Federal electronic records. NARA's vision for the newly improved version of ERA (i.e., ERA 2.0) consists of the incremental development of three primary

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modules using an agile approach. We performed this audit to assess the current status of the ERA 2.0 development effort.

NARA has spent over \$24 million and 3.5 years developing solutions to correct deficiencies in the ERA Base System, many of which still remain. Further, we found the ERA 2.0 project continues to experience a number of challenges to include funding and aligning the project to NARA's System Development Life Cycle (SDLC) policy. This is an on-going development effort with initial implementation of two modules (Digital Processing Environment and Digital Object Repository) planned for April/May 2018. As of April 7, 2017, 53 percent of the user stories/requirements were completed, while the majority of the remaining ones were deemed low priority. The ERA 2.0 Project Plan also includes the subsuming of legacy systems over fiscal years (FY) 2018 – 2020 and deploying a classified ERA 2.0 in FY 2020. Until the ERA 2.0 functionality is tested and implemented into the production system, longstanding deficiencies may continue to impact the ERA Base System.

In addition, NARA's SDLC Methodology is used to manage projects intended to develop, deploy, and operate information systems and information technology infrastructure capabilities. Although the SDLC methodology addresses performing multiple iterations of the SDLC activities for agile projects, it does not articulate how to do this effectively in order to meet one of the primary agile goals of getting functionality to the users quickly. If NARA decides to use the agile development methodology for future information technology development projects, we suggest modifying NARA's SDLC methodology to align it better for agile projects. (OIG Audit Report No. 17-AUD-15, dated August 16, 2017)

Audit of NARA's Freedom of Information Act Program

The Freedom of Information Act (FOIA) requires federal agencies to provide the public with access to government information. It is essential for agencies to effectively manage their FOIA programs to ensure transparency and ensure an effective system is in place to respond to requests timely. We performed this audit to determine whether the NARA FOIA process was efficient, effective, and complied with current laws and regulations. We also assessed internal controls in place to ensure NARA responded to FOIA requests timely and accurately.

NARA's FOIA program needs strengthening to ensure it can effectively and efficiently meet its reporting goals and the statutory requirements for timeliness. NARA lacks a centralized FOIA program that has agency-wide responsibility for FOIA compliance and performance, to include developing agency-wide policies and procedures, implementing FOIA initiatives and corrective action plans, and providing training to staff. NARA's current FOIA program is a highly decentralized, with different components providing separate policies and procedures, guidance, responses, and using separate information technology systems that do not interface.

We found management oversight needs improvement; FOIA requests are not processed timely; annual FOIA costs are not adequately supported; FOIA processing systems are not updated or centralized; FOIA staff are not adequately trained; and FOIA policies and procedures are outdated and lack consistency. We attribute these conditions to lack of adequate management

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controls and the decentralized nature of NARA's FOIA program, which were contributing factors for many of the issues identified.

Without adequate management controls, and proper structuring, NARA's FOIA program will continue to face significant backlogs (the backlog was over 4,100 FOIA requests during fieldwork) and an added risk of accruing unnecessary cost related to FOIA litigation expenses. Additionally, NARA will continue to submit unreliable FOIA data to the Department of Justice; employees will continue to duplicate efforts which may result in wasted man hours and associated labor cost; and NARA will continue to expend funds to maintain multiple information technology systems.

NARA needs to give critical attention to strengthening management controls over its FOIA process and providing better oversight and management of FOIA activities to ensure processes and procedures are effective and efficient, and adhere to statutory timeliness requirements. This report included 15 recommendations intended to strengthen controls over NARA's FOIA Program. (OIG Audit Report No. 17-AUD-16, dated September 27, 2017)

Audit of NARA's FY 2016 Compliance with Improper Payment Requirements

The Federal government is accountable for how its agencies and grantees spend hundreds of billions of taxpayers' dollars, and is responsible for safeguarding funds against improper payments and recouping them when improper payments occur. Several laws, including the Improper Payments Elimination and Recovery Act of 2010 (IPERA) address these issues.

The objective of this audit was to determine NARA's compliance with improper payment requirements based on Office of Management and Budget (OMB) Memorandum 15-02 and OMB Circular A-136.

We found NARA to be compliant with improper payment requirements. Specifically, NARA was fully compliant with IPERA requirements to report information on improper payments to the President and Congress through their annual Performance and Accountability Reports (PAR) or Agency Financial Reports (AFR), and conduct program specific risk assessments. We also found NARA's reporting on improper payments (reporting on IPERA and the Do Not Pay Initiative) was accurate and complete.

Based on the risk assessments, NARA determined the programs and activities reviewed were not susceptible to significant improper payments, and therefore were not required to perform four of six IPERA requirements. NARA also reported that payment recovery audits would not be cost-effective and appropriately notified OMB. NARA ensured improper payments in FY 2016 did not exceed 1.5 percent of program outlays, and concluded FY 2016's improper pay rate was less than 1 percent. As a result, it appears NARA is adequately safeguarding those funds against improper payments. (OIG Audit Report No. 17-AUD-13, dated April 26, 2017)

AUDITS AND REPORTS

Summaries of Other Major Reports

Review of NARA's Readiness to Implement the Digital Accountability and Transparency Act of 2014

We engaged a contractor to review NARA's readiness to implement the provisions of the Digital Accountability and Transparency Act of 2014 (DATA Act). The review included gaining an understanding of the processes, systems and controls which NARA, and its shared service provider (SSP) have, or plan to implement, to report agency expenditures and link Federal contract, loan, and grant spending information in accordance with the requirements of the DATA Act.

NARA had not formally documented, or only partially documented, some of the first four steps in the DATA Act Readiness Review Guide (Guide). However, the agency, in conjunction with the Administrative Resource Center (ARC) was ready and had executed its implementation plan, and certified its FY 2017 Quarter 2 (Q2) data submission. NARA stated formally documenting was challenging due to the evolving nature of the requirements and the real time requirement to implement the plan. Not formally and completely documenting the executed steps in the Playbook specific to NARA's role and its relevant activities with ARC could potentially result in inconsistent implementation and execution in the future, lost institutional knowledge, and delays caused by potential misunderstanding.

NARA's SSP is the United States Department of the Treasury (Treasury) Bureau of the Fiscal Service's (BFS) ARC. The Treasury OIG conducted an audit of ARC's efforts to report financial and payment information on behalf of its customer's agencies as of September 30, 2016. The Treasury OIG report *DATA Act Readiness: ARC Is Making Progress in Meeting DATA Act Reporting Requirements Despite Challenges*, OIG17-039 dated April 13, 2017, indicates that Treasury OIG identified a number of risks and challenges related to its DATA Act implementation efforts on behalf of its customer agencies. These included: data quality concerns, PMO and OMB delays in finalizing Government-wide guidance resulting in short implementation timelines, resource limitations, systems change concerns, customer engagement, and difficulty identifying customer award information. ARC documented, and is in the process of executing, viable corrective actions to overcome these identified challenges. Treasury OIG's report indicates that if ARC fully executes its DATA Act implementation plan as designed, ARC will meet the DATA Act reporting requirements by the established May 2017 deadline.

This report includes two recommendations to improve NARA's efforts in compliance with the requirements of the DATA Act prospectively. (OIG Report No. 17-R-14, dated June 16, 2017.)

Management Letter: Building Issues at the Washington National Records Center

This letter alerted management to issues, some of which have been categorized as "Life Safety" issues, with the facility at the Washington National Records Center (WNRC) which NARA leases from the General Services Administration (GSA) in Suitland, MD. According to WNRC staff, the myriad of nagging facility issues and broken equipment resulting from years of neglect and inattention have caused endless frustration and significant morale problems with staff and

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other impacts to NARA's operations and mission. For example, a Final Building Engineering Report for WNRC listed many requirements for the building. One requirement category was titled "Life Safety" with priority codes of "Immediate/First Year," "Within 1 to 2 Years," and "Does Not Meet Current Codes/Standards." None of the eight issues identified as "Life Safety" had been addressed more than two years after this report was issued. Further, WNRC staff relay that some of these exact same issues were identified in an earlier 2010 report.

Additionally, WNRC has physical custody of 3.8 million cubic feet of federal records. Almost half of these records are classified as "permanent," meaning they will ultimately be transferred to NARA's custody for permanent preservation. NARA's facility standards require that permanent records be stored, 24-hours a day/365 days per year, in office-level air conditioning. The conditions in WNRC consistently fail to meet these standards. Further, we were told GSA does not plan to replace all the "end of life" air handling units which could provide this air conditioning until FY 2021.

Historic issues with water damaging records have plagued the facility. Electrical malfunctions earlier this year, including a fire, have highlighted the overarching risk to NARA's holdings. NARA and GSA appear to have begun taking some steps to begin addressing these issues. However, NARA must be extra vigilant to ensure the facility is finally attended to, and is not once again neglected as in years past. As some of these issues were identified as life safety issues, we referred this to the GSA OIG. (OIG Management Letter No. 17-ML-17, dated September 22, 2017.)

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INVESTIGATIONS

Investigations Overview

The Office of Investigations (OI) receives and evaluates complaints and conducts investigations related to fraud, waste, and abuse in NARA programs and operations. This includes identifying and recovering wrongfully alienated NARA holdings. Investigations showing violations of law, regulations, rules, or contract terms may result in administrative, civil, or criminal actions. These can include things such as terminations, debarments, prison terms, probation, fines, restitution, and other actions. The OI may alert management to potential problems or vulnerabilities through Management Letters or other products if a full investigation is not warranted or appropriate. The OI may also conduct assessments of areas with the potential for fraud. Assessments are typically designed to proactively review limited aspects of NARA's programs and operations such as contract compliance and telework adherence. They are intended to be quick looks at potential issues, and are not designed to be in-depth, detailed accounts. Accordingly, they do not follow any set standards or procedures. The purpose is to alert management to issues. While they may offer suggestions, they generally do not make recommendations for corrective action.

Significant Investigations and Updates

Viewing Streaming, Playing Video Games and Gambling While Working at NARA.

The OI investigated allegations an employee misused their NARA-provided computer to spend excessive quantities of work time on the internet. The subject admitted, since May 2015, they spent as much as half of their daily working hours streaming videos, looking at pornographic images, playing video games, and gambling online. Our investigation resulted in the agency terminating the subject's employment and taking administrative corrective action to recoup wages.

Theft - World War II Era Personal Artifacts of Downed Airmen

As stated in the DOJ's press release, a complaint was filed against a historian alleging the following actions. The historian repeatedly visited the National Archives at College Park, MD, and stole dog tags and other documents belonging to U.S. servicemen whose planes had crashed during World War II. The researcher sold the stolen dog tags on eBay. In addition, on at least one occasion, the researcher gave a stolen dog tag assigned to a Tuskegee Airman to a museum in Virginia, in exchange for an opportunity to sit inside a Spitfire airplane. Investigators executed a federal search warrant at the researcher's residence and seized six dog tags and other documents that had been stolen from NARA. If convicted, the researcher faces a maximum sentence of ten years in prison.

Pursuing Lead on 1978 Theft from Truman Library

In January 2017, a private citizen contacted NARA to provide information regarding highly valuable, jewel encrusted, swords and daggers that had been stolen from the Harry S. Truman Presidential Library and Museum (the Library) in Missouri in 1978. The swords and daggers were gifted to President Truman by Prince Saud of Saudi Arabia and by the Shah of Iran. The reporting party had recently watched an episode of *Brad Meltzer's Lost History*, which profiled the 1978 theft. This episode reminded the complainant of an allegation that around the time of the aforementioned theft, immediate family members had stolen highly ornate and bejeweled edged weapons from a museum in Missouri. The OI worked jointly with the FBI to investigate

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this lead. The OI and the FBI conducted numerous interviews and received consent to search the residence of one of the accused, with negative results. The OI and FBI also requested assistance from the local police department - thought to have the artifacts in their custody based on a former investigation. The police department did not possess the artifacts. This investigation is ongoing.

Viewing Pornography While at Work and Soliciting Prostitutes While on Government Travel

The OI investigated allegations an employee misused their NARA-issued computer to view pornographic content, including searches for escort services. During an OI interview the subject admitted to spending approximately 90 minutes each working day using their NARA computer to view pornography and escort services-related websites. Moreover, the subject engaged the services of an escort in a Government-paid hotel room while on official travel. The OI referred this matter to the agency for action deemed appropriate and is awaiting agency response.

OI Recovery of 1859 Civil War Era Letter

In 2004, the OI investigated the theft of NARA documents by a former NARA employee; those documents, which were not recovered at the time, were added to NARA's missing documents website. In November 2016, a member of NARA's Holdings Protection Team learned one of the missing documents, an 1859 letter written by Captain Lewis Armistead¹ sold at auction for \$17,250. The OI worked jointly with the United States Attorney for the Middle District of Tennessee to recover the letter and subsequently returned it to NARA's holdings.

Employee Abusing Access to Personnel Files

The OI completed an investigation into an allegation an employee improperly accessed the official personnel folders of other NARA employees, including senior agency management. Our investigation substantiated the allegation, and the agency proposed terminating the employee.

Recovery of Two NARA iPads

In March 2017, two unsecured NARA iPads were stolen from the Archives I Boeing Learning Center. Our investigation identified a former contractor as a person of interest, and subsequently collected evidence. A criminal referral for prosecution was made to the Assistant United States Attorney for the District of Columbia, which is still pending.

Shipping Company Violated Contract Terms

In July 2017, it was reported that NARA-holdings, Federal tax return documents were tampered-with *en route* during shipping. Our investigation determined that the documents themselves were not tampered with. However, the OI discovered the trucking company removed NARA locks and seals in order to add a load from a private customer to the NARA shipment. This addition was a violation of the NARA's Bill of Lading. The trucking company then placed the shipment on a train; causing another violation of NARA's Bill of Lading which requires transportation by truck with no transfers between origin and destination. In this reporting period, criminal and civil actions were pursued, but both were declined.

¹ Later Brigadier General in the Confederate Army during the Civil War.

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Spouse Fraudulently Assumed Veteran's Identity for Access to Records

In May 2017, a veteran reported that their spouse unlawfully assumed their identity fraudulently to obtain from the National Personnel Records Center copies of their service and military medical records, to potentially use against them in planned divorce proceedings. Our investigation substantiated the allegation. Federal prosecution was declined. The investigator is currently working with local law enforcement toward a state-level prosecution.

Arrest Warrant Issued for Contractor Who Threatened Supervisor

Previously, we reported that a former employee of a NARA contractor had made threatening communications to their former supervisor after being terminated, including telephone calls, a text message, and a photograph showing the former employee surrounded by weapons and holding a rifle. In this reporting period, the subject pled guilty to one state charge of making threats over the telephone, and was sentenced to 12 months of probation, 20 hours of community service, and a fine of \$157.50.

Viewing Pornography While at Work

In this reporting period, the OI completed an investigation of allegations that, since at least 2014, an employee had used their NARA-issued computer on an almost daily basis to view pornographic images while at work. When termination was proposed, the subject instead retired.

Bomb Threat at the National Archives in Boston

On August 29, 2017, the National Archives at Boston received an electronic mail threat that shrapnel bombs had been placed in its facility. The building was evacuated, police swept the facility with bomb-sniffing dogs, and the "all-clear" was given. The OI discovered that the NARA facility was only one of multiple, similar, bomb-threat recipients around that date, including a school, a senior center, and several hotels; none were legitimate. The OI coordinated with both the local Waltham (Boston) Police Department and the Federal Bureau of Information, and was able to provide significant information. This investigation continues.

Streaming Music and Sports Using NARA Internet and NARA Issued Computer

The OI investigated allegations an employee misused NARA's internet resources by utilizing excessive quantities of bandwidth in violation of NARA Policy 802. During the OI interview, the subject admitted that for at least the past six months, the subject spent significant quantities of worktime streaming music and viewing various sports-related and other websites on his NARA-issued computer. The OI referred this matter to the agency for action deemed appropriate and is awaiting agency response.

Investigations of Senior Government Employees

Supervisor Requested Loan from Subordinate

In May 2017, the OI developed an allegation that, on at least one occasion, a senior NARA official had asked for and received personal loans from a subordinate. Our investigation substantiated the allegation. The OI referred this matter to the agency for action deemed appropriate and is awaiting agency response.

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Allegations of Potential Conflict of Interest

We found that a NARA supervisor had hired as their direct subordinate a person who was a joint owner of an outside business. The subject had not reported the potential conflict of interest to their supervisor, nor had they sought ethical guidance from the Office of the General Counsel (OGC) until investigation of the potential conflict was underway. Our investigation did not establish that an actual conflict of interest existed (as opposed to an appearance of a conflict of interest), or that agency resources were misused, and we issued a report of our findings to the agency.

Prohibited Personnel Practices in Hiring

In July 2016, it was reported that a senior NARA official unlawfully preselected two employees for two positions that had not been announced, and committed a prohibited personnel practice. The complainant alleged that during the meeting to discuss the positions, the senior NARA official told employees who were interested in applying they could not apply. This matter was referred to another investigative agency.

Significant Referrals

Consistent Time and Attendance Discrepancies Reported

In April 2017, as part of a larger and more general review of time and attendance policies, two employees were identified whose badge records consistently failed to match their sign-in records for the period under review. The discrepancies were always in the employees' favor, and one of the two employees consistently claimed significantly more time than their badge records could substantiate. The reviewing official notified the OI, and explained their findings and plan to coordinate with the Office of Human Capital for appropriate disciplinary action. One employee received verbal counseling, and the employee with the more egregious misconduct received written counseling.

Misappropriation of Agency Resources

In May 2017, the OI received an allegation that an employee had covered-over the pre-printed return address block of a NARA stationery envelope, written their personal address on it, used the envelope for a personal transaction, and attempted to mail the envelope using NARA's postage and resources. The envelope was discovered and stopped before it entered the general postal system. The OI referred the matter for administrative action, and the subject was issued a Letter of Reprimand.

Error in Processing FMLA Request

In May 2017, the OI received allegations of multiple potential improprieties regarding the process concerning an employee's request for *Family and Medical Leave Act* (FMLA) time. According to the initial complaint, the FMLA request was not adequately supported with required documentation, was approved retroactively, and at least one date was improperly altered in an effort to hide the retroactive approval. The agency's comprehensive review of the matter in response to the OI's referral showed that there were no improprieties. However, it was discovered that inadvertently a single date error occurred during the FMLA processing. The processing official was counseled regarding the error, and office policy was revised to ensure the inclusion of reviewing management officials in the future.

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Oversight

Assessment of NARA's Workers' Compensation Program

The U.S. Department of Labor, Office of Workers' Compensation Programs (OWCP), is responsible for facilitating Federal employees' worker compensation benefits under the Federal Employees' Compensation Act (FECA). FECA is a workers' compensation law that provides compensation for Federal employees with job-related injuries or illness. The OWCP works with Federal agencies to administer care and compensation to qualifying employees. Benefits are paid from the Employees' Compensation Fund, which is administered by the OWCP and replenished from the employees' agencies through a chargeback system. In this reporting period, the Office of Investigations conducted a limited assessment of NARA's workers' compensation program rolls, with particular focus on those participants who receive monthly compensation with little or no associated medical expenses. The assessment concluded having identified nine individuals who met the review criteria; all nine flagged individuals will be reviewed further in individual inquiries.

Assessment of Employee Misuse of NARA Information Technology Resources

NARA 802, Use and Monitoring of NARA Office and Information Technology (IT) Equipment and Resources (NARA 802) offers extensive guidance to NARA employees, making clear the distinctions between, e.g., work-related and personal use of the agency's IT resources, and between appropriate and inappropriate use of the agency's information technology resources. While effective blocking technology exists and is, subject to specific restrictions, in use at NARA, the technology is imprecise. There is as yet no effective substitute for human review and judgment in considering what constitutes "abuse" of the agency's IT resources. In this reporting period, the Office of Investigations conducted periodic, regular assessments of raw data captures of agency IT resources by all NARA employees. Our particular focus was on the areas of:

- Gambling, or other forms of online gaming
- Pornography
- Proxy Avoidance
- Streaming media and file transfers

Each assessment in this reporting period has resulted in one or more NARA employees being identified as potentially in violation of NARA 802. Each employee flagged by one of our assessments will be reviewed further in individual inquiries.

Assessment of Employee Weekend and After-Hours Activity at Archives II

NARA's Security Management Division (BX) requires all NARA badge holders to exit the Archives II facility no later than 7:30 p.m. on normal working days. Exceptions to this directive include those badge holders who have been issued 24-hour access badges, and badge holders who receive supervisory and BX approval to exceed the standard, mandated departure time. BX established this requirement to address concerns that, in off-hours, the facility is not sufficiently staffed for potential safety or security issues. In this reporting period, the OI conducted periodic, regular assessments of the data regarding employees who come in to the facility on weekends, and who on regular work days stay past the 7:30 p.m. departure time. For most of these assessments, our focus was on those employees who repeatedly visit on weekends and/or who

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leave after 7:30 p.m. on regular working days, but whose visits and/or departures are in some way inconsistent. For those assessments which identified employees who met the search criteria, all flagged employees will be reviewed further in individual inquiries.

Assessment of Conference Costs

In this reporting period, the OI conducted an assessment of the travel and other costs associated with a conference attended by NARA employees. Our assessment determined that the costs incurred were reasonable, commensurate with the size, location and duration of the conference, and necessary to accommodate participation.



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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 <http://www.archives.gov/oig/> for more information, or contact us:

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

The OI promptly and carefully reviews calls, letters, and email to the Hotline. Hotline intakes which warrant further action may be processed as preliminary inquiries to determine whether they should be investigated as numbered investigations. Some Hotline intakes may not warrant further action by the OI. Where appropriate, referrals may be made to OIG audit staff, NARA management, or external authorities.

<u>Hotline Activity for the Reporting Period</u>	
Hotline and Complaints received	169
Hotline and Complaints referred to NARA or another entity	31

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.

DISAGREEMENTS AND OTHER MATTERS

Disagreements with Significant Management Decisions

Under the IG Act, as amended, the OIG reports “information concerning any significant management decision with which the Inspector General is in disagreement.”

Federal Manager’s Financial Integrity Act Reporting

Based upon NARA’s FY 2016 Federal Manager’s Financial Integrity Act (FMFIA) statement and our assessment of NARA’s internal controls for FY 2016, we urged the agency to reconsider their assurance statement for Section 2 of the (FMFIA) reporting requirements. We agree NARA’s Information Technology Security poses a material weakness. However, as in years past, the OIG continues to be concerned NARA may not be adequately reporting the full breadth of their current risk environment. NARA lacks an enterprise-wide risk management (ERM) program that clearly identifies, prioritizes, and manages risks throughout the organization. As a result, management’s internal control activities and assurance statements may not account for the true level of risk to the entirety of the organization. This area was audited by the OIG in the current cycle, and many recommendations remain open.

Along with this overarching condition, several specific areas give rise to concerns. Notably, NARA has highlighted they are running out of physical space for incoming archival accessions. Quite simply, there is no room for the records NARA plans to receive. However, years after flagging this issue, NARA has made no decisions on how to address it, nor started what may reasonably be expected to be a long process to build or procure a solution. Further, NARA’s procurement process deserves scrutiny in considering NARA’s risk universe. Issues in this area were previously audited, and a new audit begun in this reporting period. Finally, there have been historical issues with the processing of incoming records and identifying electronic records and ensuring that they come into NARA. Past audits of these areas have multiple open recommendations, and the Office of Audits plans to revisit these areas again in the near future to assess the current state of these programs.

Other Matters Affecting OIG Operations

During this period the Office of Audits experienced several situations where NARA personnel chose not to provide information in a timely manner and other issues accessing agency information. Some managers were making individuals disclose the content of their discussions with the OIG related to audits, and others were forcing employees to send all information requests to a central point for review prior to giving any documents to the OIG. We made NARA’s senior leadership aware of the situation and worked with them to dispel employee misunderstandings and clear these impediments. Further, NARA subsequently disseminated a notice reminding all NARA staff to fully cooperate with the OIG in providing timely access to all information requested by auditors during audits.

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Overview

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

1. Electronic Records Archives

The Electronic Records Archives (ERA) system is a repository for electronic Presidential, Congressional, and Federal agency records that was initially billed as storing files in any format for future access. The ERA system is NARA's primary strategy for addressing the challenge of storing, preserving, transferring, and providing public access to electronic records. However, virtually since inception, the program has been fraught with delays, cost overruns, and technical short-comings and deficiencies identified by our office and the Government Accountability Office (GAO). As a result, many core requirements were not fully addressed, and ERA lacks the originally envisioned functionality.

The ERA Base System for Federal electronic records has had many problems with its reliability, scalability, usability, and costs, which have prevented it from being adequate for both NARA's current and expected future workload. Given the limitations of the system in managing the transfer, processing and storage of large deliveries of digital materials, and advances in technology (particularly cloud computing), NARA has determined it is essential to evolve the current ERA Base System. This will entail the correction and re-factoring of current capabilities, as well as the adaptation and expansion of capabilities in order to fulfill the agency's mission to meet the expected demands of a rapidly growing backlog of digital and digitized materials. NARA's solution to address the system limitations is the ERA 2.0 Project. This is an on-going development effort with initial implementation currently planned for April/May 2018 and lifecycle costs estimated at \$45 million. The ERA 2.0 Project Plan also includes the subsuming of legacy systems over fiscal years (FY) 2018 – 2020 and deploying a classified ERA 2.0 in FY 2020. Until the ERA 2.0 functionality is tested and implemented into the production system, longstanding deficiencies may continue to impact functionality of the ERA Base System. ERA faces many challenges going forward. These include the growth in the amount and diversity of digital materials produced by government agencies; and the need for expanded capabilities to achieve the mission of driving openness, cultivating public participation, and strengthening the nation's democracy through access to high-value government records.

2. Improving Records Management

NARA must work with Federal agencies to ensure the effective and efficient appraisal, scheduling, and transfer of permanent records, in both traditional and electronic formats. The major challenge is how best to accomplish this while reacting and adapting to a rapidly changing technological environment in which electronic records, particularly email, proliferate. In short, while the ERA system is intended to work with electronic records received by NARA,

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we need to ensure the proper electronic and traditional records are in fact preserved and sent to NARA in the first place.

In August 2012, the Office of Management and Budget (OMB) and NARA jointly issued Memorandum 12-18, *Managing Government Records Directive*, creating a robust records management framework. This directive requires agencies, to the fullest extent possible, to eliminate paper and use electronic recordkeeping. It is applicable to all executive branch agencies and to all records, without regard to security classification or any other restriction. This directive also identifies specific actions to be taken by NARA, OMB, and the Office of Personnel Management (OPM) to support agency records management programs. Agencies must manage all permanent electronic records in an electronic format by December 31, 2019, and must manage both permanent and temporary email records in an accessible electronic format by December 31, 2016. NARA, its government partners, and Federal agencies are challenged with meeting these deadlines, determining how best to manage electronic records in accordance with this guidance, and how to make electronic records management and e-Government work more effectively.

In May 2015, GAO completed a study evaluating Federal agencies' implementation of the directive. They found NARA's plan to move agencies toward greater automation of records management did not include metadata requirements in its guidance, as required. Further, until agencies, OMB, and NARA fully implement the directive's requirements, GAO indicated the Federal government may be hindered in its efforts to improve performance and promote openness and accountability through the reform of records management. Subsequently, NARA did issue metadata guidance in September 2015. However, that is only one aspect of a complicated issue.

3. Information Technology Security

Each year, risks and challenges to IT security continue to be identified. Many of these deficiencies stem from the lack of strategic planning with regard to the redundancy, resiliency, and overall design of NARA's network. These issues not only allow for security and performance problems, but they inhibit NARA IT management from effectively establishing a tactical and innovative strategy for the next generation of NARA's network. Adding to the challenge is NARA's administrative structure as NARA's Chief Information Officer (CIO) does not report directly to the head of the agency. NARA must ensure the security of its data and systems or risk undermining the agency's credibility and ability to carry out its mission.

The Archivist identified IT Security as a material weakness under the Federal Managers' Financial Integrity Act (FMFIA) reporting process from FY 2007 to FY 2017 (with exceptions of 2013 and 2014, where it was downgraded to a reportable issue). In FY 2017, management developed an action plan to resolve the control deficiencies identified in prior years, which collectively represented a material weakness. The action plan to address such weaknesses is aligned with the cybersecurity framework (e.g., Identify, Protect, Detect, Respond, and Recover). However, the action plan is not expected to be fully implemented until FY 2020.

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In addition, annual assessments of NARA's compliance with the Federal Information Security Modernization Act (FISMA) have consistently identified functional areas in need of significant improvement. While initiatives have been introduced to promote a mature information security program for the agency, real progress will not be made until NARA establishes an effective system of internal control for information security. The confidentiality, integrity, and availability of our electronic records and information technology systems are only as good as NARA's IT security program infrastructure.

4. Expanding Public Access to Records

NARA's FY 2014-2018 Strategic Plan emphasizes public access to records by including the strategic goal: "Make Access Happen." This goal establishes public access as NARA's core purpose and includes an initiative to digitize all analog archival records to make them available online. Historically, the digitization approaches implemented by NARA were not large enough to make significant progress in meeting this goal. Further, due to poor planning and system limitations of the public-facing National Archives Catalog, millions of records digitized through NARA's partnership agreements were not 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 its digitization strategy and expand public access to records.

Approximately 22 percent of NARA's textual holdings have not been processed to allow efficient and effective access to them. To meet its mission, NARA must work to ensure it has the processes and resources necessary to establish intellectual control over this backlog of unprocessed records. However, NARA's FY 2012 assurance statement downgraded the Processing Program from a material weakness to a reportable condition. This is concerning as audits have identified multiple issues with the program, including the fact NARA lacks a strategic direction. Further, NARA reports the amount of unprocessed records by giving the percentage of records which have been processed. However, this can lead to un-intuitive results, such as when the physical volume of unprocessed records increases, but the percentage of records processed increases as well since the total collection is growing. Thus an "improving" percentage figure can at times also represent a physically growing backlog of unprocessed records.

5. Meeting Storage Needs of Growing Quantities of Records

NARA is approaching its overall limits in archival storage capacity. Space limitations are affecting NARA's accessioning, processing, preservation, and other internal efforts. NARA is challenged in acquiring sufficient archival space to store its ever-increasing volume of textual records. Without obtaining additional archival space, NARA may face challenges in meeting its mission and may have to house accessioned textual records in space not meeting its physical and environmental requirements. 44 U.S.C. § 2903 makes the Archivist responsible for the custody, control, operation, and protection of buildings used for the storage of Federal records. NARA-promulgated regulation 36 CFR Part 1234, "Facility Standards for Records Storage Facilities," requires all facilities housing Federal records to meet defined physical and environmental requirements. NARA's challenge is to ensure NARA's own facilities, as well as those used by

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other Federal agencies, are in compliance with these regulations; and to effectively mitigate risks to records which are stored in facilities not meeting these standards.

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

6. Preservation Needs of Records

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

7. Improving Project and Contract Management

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

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

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value management (EVM), a project management approach providing objective reports of project status and early warning signs of cost and schedule overruns. Inconsistent use of key project management disciplines like EVM limits NARA's ability to effectively manage projects and accurately report on their progress. In another example, our office found issues in the process of implementing a Homeland Security Presidential Directive (HSPD-12) compliant logical access control system. The HSPD-12 implementation is a long overdue project. Inadequate planning may not only result in delayed completion, but may also hinder the agency from complying with Federal laws and regulations.

Effective contract management is essential to obtaining the right goods and services at a competitive price to accomplish NARA's mission. NARA is challenged with proper management support and visibility within the organization to adequately align acquisition functions with NARA's mission and needs. NARA is challenged with strengthening the acquisition workforce and to improve the management and oversight of Federal contractors. Lastly, NARA is challenged with strengthening internal controls over acquisition functions and providing better oversight and management of its procurement activities to ensure effective and efficient processes and procedures adhere to Federal and internal guidance.

8. Physical and Holdings Security

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

9. Human Resources Management

NARA's ability to attract, recruit, and retain employees while improving workforce morale is critical to many of the other top management challenges. Human capital is integral to NARA's future as the agency continues to build a modern and engaged workforce, develop the next generation of leaders, and encourage employees to collaborate, innovate, and learn. One of the agency's strategic goals is to "*build our future through our people.*" However, the agency has not developed a comprehensive and cohesive approach to human capital management. Adequate policies and procedures have not been developed, updated, and communicated which make it difficult to manage human capital effectively and efficiently. Further, NARA does not have one authoritative source providing the latest data to role-based users on all types of workers (Federal employee, contractor, and volunteer). The numerous existing systems make it difficult to manage the workforce. However, NARA recently announced a plan to migrate their human resources systems and services to a shared service provider, the Department of Treasury, Bureau of the Fiscal Service, Administrative Resource Center (BFS/ARC). NARA expects this move to

TOP TEN MANAGEMENT CHALLENGES

improve the timeliness of the hiring process and provide better human capital services. The OIG had ongoing and planned audit work in these areas when the announcement was made. We plan to continue with portions of the plan not affected by the transition.

10. Enterprise Risk Management

In July 2016, OMB updated its Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, to ensure Federal managers are effectively managing risks an agency faces toward achieving its strategic objectives and arising from its activities and operations. The Circular provides updated implementation guidance to Federal managers to improve accountability and effectiveness of Federal programs as well as mission support operations through implementation of Enterprise Risk Management (ERM) practices and by establishing, maintaining, and assessing internal control effectiveness. An effective ERM capability:

- creates and protects value;
- is an integral part of organizational processes and decision making;
- is dynamic, iterative, and responsive to change; and
- facilitates continual improvement of the organization.

NARA has yet to implement an ERM program that clearly identifies, prioritizes, and manages risks throughout the organization. NARA management has not made the implementation of an ERM program a strategic priority and instead has been relying on their ICP and Management Control Oversight Council to identify and manage risks throughout the organization. As a result, management's internal control activities and assurance statements continue to be based on work at the individual function, program, and office level. Additionally, without an effective ERM process in place that clearly identifies, categorizes, and assesses the effectiveness of controls related to key risks, the Archivist's annual assurance statement to the President and Congress may not clearly reflect NARA's current internal control environment, including risks.

NARA's challenge is to ensure the agency is in compliance with requirements of the updated OMB Circular A-123, and to develop and fully implement an ERM capability.

REPORTING REQUIREMENTS

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

IG Act § or Law	Subject	Page(s)
§ 4(a)(2)	Review of legislation and regulations	4, 8, 10
§ 5(a)(1)	Significant problems, abuses, and deficiencies discovered during the reporting period	2–3, 12–16, 17–20
§ 5(a)(2)	Significant recommendations for corrective action	2–3, 12–16
§ 5(a)(3)	Prior significant recommendations on which corrective action has not been completed	36–38
§ 5(a)(4)	Summary of prosecutorial referrals and convictions	17–20, 32
§ 5(a)(5)	Information or assistance refused and reported to agency head	35
§ 5(a)(6)	List of audit, inspection, and evaluation reports issued	33
§ 5(a)(7)	Summaries of significant reports	2–3, 12–16, 17–20
§ 5(a)(8)	Questioned costs in audits, inspections, and evaluations	33
§ 5(a)(9)	Funds put to better use in audits, inspections, and evaluations	34
§ 5(a)(10)	Prior audit, inspection, and evaluation reports with no management decision, no management comment, or unimplemented recommendations	35
§ 5(a)(11)	Significant revised management decisions	35
§ 5(a)(12)	Significant management decisions with which the OIG disagreed	24, 35
§§ 5(a)(14), (15), (16)	Reporting on OIG peer review	9
§ 5(a)(17)	Statistical table on investigations and referrals	32
§ 5(a)(18)	Description of metrics used in § 5(a)(17) table	32
§ 5(a)(19)	Reporting on substantiated investigations of senior government employees	19–20
§ 5(a)(20)	Reporting on substantiated whistleblower retaliations	35
§ 5(a)(21)	Reporting on agency attempts to interfere with OIG independence	35
§ 5(a)(22)(A)	Closed inspections, evaluations, and audits not disclosed to the public	2–3, 12–16
§ 5(a)(22)(B)	Closed investigations of senior government employees not disclosed to the public	19–20
P.L. 110-181	Annex on completed contract audit reports	35
P.L. 104-106	Open audit recommendations	36–38

REPORTING REQUIREMENTS

SUMMARY OF INVESTIGATIONS AND PROSECUTORIAL REFERRALS

Requirement 5(a)(4), (17), and (18)

<i>Investigative Workload</i>	
Hotline and complaints received and opened this reporting period	169
Hotlines and complaints referred to other parties during this reporting period	31
Investigations opened this reporting period	14
Investigations closed this reporting period	16
Investigative reports issued this reporting period	16
<i>Investigative Results</i>	
Total individuals referred to DOJ for prosecution	7
Individuals referred to DOJ – accepted for prosecution	4
Individuals referred to DOJ – declined for prosecution	4
Individuals referred DOJ – pending prosecution decision	0
Total individuals referred to state and local authorities for prosecution	3
Individuals referred to state and local authorities – accepted for prosecution	0
Individuals referred to state and local authorities – declined for prosecution	3
Individuals referred state and local authorities – pending prosecution decision	0
Arrest	1
Indictments and informations	0
Convictions	1
Fines, restitutions, judgments, and other civil and administrative recoveries	\$18,235.50
<i>Administrative Remedies</i>	
Employee(s) terminated	0
Employee(s) resigned	1
Employee(s) suspended	0
Employee(s) given letter of reprimand or warnings/counseled	8
Employee(s) taking a reduction in grade in lieu of administrative action	0
Contractor (s) removed	0
Individual(s) barred from NARA facilities	0

The numbers in the table above were compiled by our electronic case management system, and only reference actions that happened within the reporting period. If the case was a joint case worked with another investigative office, the statistics above show the total numbers for the case and do not apportion numbers to each office. Investigative reports include only Reports of Investigation for numbered investigations.

REPORTING REQUIREMENTS

LIST OF AUDIT, INSPECTION, AND EVALUATION REPORTS ISSUED Requirement 5(a)(6)

Report No.	Title	Date	Questioned Costs	Unsupported Costs	Funds Put to Better Use
17-AUD-12	Audit of NARA's Online Access to Digitized Holdings	6/19/2017	\$0	\$0	\$62,000
17-AUD-13	Audit of NARA's FY 2016 Compliance with Improper Payment Requirements	4/26/2017	\$0	\$0	\$0
17-AUD-15	Audit of NARA's Electronic Records Archives 2.0 Project	8/16/2017	\$0	\$0	\$0
17-AUD-16	Audit of NARA's Freedom of Information Act Program	9/27/2017	\$0	\$0	\$0

LIST OF OTHER REPORTS ISSUED

Report No.	Title	Date
17-R-14	Review of the National Archives and Records Administration's Readiness to Implement the Digital Accountability and Transparency Act of 2014	6/16/2017
17-ML-17	Building Issues at the Washington National Records Center	9/22/2017

AUDIT, INSPECTION, AND EVALUATION REPORTS WITH QUESTIONED COSTS

Requirement 5(a)(8)

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

REPORTING REQUIREMENTS

AUDIT, INSPECTION, AND EVALUATION REPORTS WITH RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE

Requirement 5(a)(9)

Category	Number	Dollar Value
A. For which no management decision has been made by the commencement of the reporting period (see note below)	3	\$9,069,395
B. Which were issued during the reporting period	1	\$62,000
Subtotals (A + B)	4	\$9,131,395
C. For which a management decision has been made during the reporting period	0	\$0
(i) dollar value of recommendations that were agreed to by management	0	\$0
Based on proposed management action	0	\$0
Based on proposed legislative action	0	\$0
(ii) dollar value of recommendations that were not agreed to by management	0	\$0
D. For which no management decision has been made by the end of the reporting period	4	\$9,131,395
E. For which no management decision was made within 6 months of issuance	3	\$9,069,395

Note: OIG Advisory Report No. 12-08, NARA's Reliance on Legacy Systems to Meet Electronic Records Mission Needs, dated March 30, 2012 found that by not implementing many of the original requirements the ERA System lacks much of the functionality originally envisioned. This had resulted in NARA spending approximately \$9 million to operate, maintain, and use eight older, outdated legacy systems that were supposed to be retired and/or subsumed with the implementation of the ERA system. While this does not flow directly from a numbered audit recommendation, we believe these issues are significant and should be publicly reported. The actual cost is likely much higher as these costs may be repeating annually. However, we do recognize NARA has been constrained in how they have been allowed to develop ERA. We hope to update this information soon as new audit work in this area is ongoing.

REPORTING REQUIREMENTS

OTHER REQUIRED INFORMATION

REQUIREMENT	CATEGORY	SUMMARY
5(a)(5)	Information or assistance refused	None.
5(a)(10)	Prior audit reports with no management decision	Management has concurred or disagreed with all issued reports.
5(a)(11)	Significant revised management decisions	None.
5(a)(12)	Significant management decisions with which the OIG disagreed	See page 24.
5(a)(20)	Detailed description of instances of whistleblower retaliation, including consequences for the offender	No closed investigations this period substantiated whistleblower retaliation.
5(a)(21)(A)	Agency attempts to interfere with OIG independence with budget constraints designed to limit the OIG's capabilities	None.
5(a)(21)(B)	Agency attempts to interfere with OIG independence by resisting or objecting to oversight activities, or restricting or significantly delaying access to information	None rising to this level. However, please see page 24 for general information.

ANNEX ON COMPLETED CONTRACT AUDIT REPORTS

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

REPORTING REQUIREMENTS

SUMMARY OF REPORTS MORE THAN SIX MONTHS OLD PENDING CORRECTIVE ACTION

An important responsibility of the OIG is to follow-up on previous issued reports with outstanding recommendations. The OIG, in concert with the agency, has continued working to close recommendations in a timely manner. During this period, 79 audit recommendations were either closed or subsumed into other recommendations. The agency continues to make reducing open audit recommendations a priority. At the close of the period there were 47 audits with 311 total open recommendations more than six months old.

Report Number	Date Issued	Title	Number of Open Recommendations
08-02	11/14/2007	Audit of NARA's Purchase Card Program	1
08-07	4/24/2008	Audit of NARA's Researcher Registration Identification Card Program	1
09-15	9/29/2009	Audit of NARA's Work at Home System	1
10-04	4/2/2010	Audit of NARA's Oversight of Electronic Records Management in the Federal Government	3
10-07	4/28/2010	Audit of NARA's Network Infrastructure	1
11-02	11/8/2010	Network Vulnerability and Penetration Testing Oversight	8
11-14	7/7/2011	Audit of NARA's Foreign and Premium Travel	2
11-15	7/7/2011	Audit of NARA's Drug Testing Program	4
11-20	9/30/2011	Audit of NARA's Telework Program	3
12-05	3/27/2012	Audit of the Management of Records at the Washington National Records Center	4
12-09	5/10/2012	Audit of Data Center Consolidation Initiative at NARA	5
12-10	9/13/2012	Follow-up Review of OIG Audit Report 08-01: Audit of the Process of Safeguarding and Accounting for Presidential Library Artifacts	7
12-11	8/27/2012	Network Discovery and Assessment Oversight GS-	8
12-15	7/23/2012	Audit of NARA's Classified Systems	4
13-01	12/10/2012	Audit of NARA's Internal Control Program	1
13-08	7/9/2013	Audit of NARA's Preservation Program (Textual)	11

REPORTING REQUIREMENTS

Report Number	Date Issued	Title	Number of Open Recommendations
13-10	7/9/2013	NARA Archival Facilities	5
13-11	9/19/2013	Audit of the Base ERA System's Ability to Ingest Records	2
13-14	9/18/2013	Audit of Processing of Textual Records	7
14-01	1/30/2014	Audit of the Management and Oversight of NARA's Energy Savings Performance Contracts	1
14-05	3/11/2014	Audit of NARA's Field Offices Acquisition Activity	2
14-08	4/17/2014	Audit of NARA's Capital Planning and Investment (CPIC) Process	7
14-09	5/1/2014	Audit of Conference-Related Activities and Expenses	3
14-10	5/9/2014	Audit of Enterprise Wireless Access	9
14-11	5/5/2014	Audit of Special Telework Arrangements at NARA	7
14-12	7/3/2014	Audit of Selected Aspects of NARA's Digitization Program	1
15-01	10/24/2014	NARA's Information Security Program	1
15-02	11/12/2014	Audit of NARA's Mobile Device Management	6
15-03	2/6/2015	Audit of Specially Protected Holdings	21
15-10	3/30/2015	Audit of NARA's Digitization Partnerships	3
15-11	5/5/2015	Audit of NARA's Digitization Storage and Transfer Capabilities	2
15-13	8/24/2015	Audit of NARA's Human Resources Systems and Data Accuracy	6
15-14	9/29/2015	Audit of NARA's Space Management	9
15-15	9/30/2015	Oversight Assessment of NARA's Cable Infrastructure	8
16-01	10/19/2015	Audit of NARA Web Hosting Environment	23
16-02	1/16/2016	Audit of NARA's Compliance with FISMA , As Amended	16
16-03	3/4/2016	Inadequate Information and Physical Security Controls at Select Federal Records Centers	2
16-05	3/25/2016	Audit of NARA's Publicly-Accessible Websites	16

REPORTING REQUIREMENTS

Report Number	Date Issued	Title	Number of Open Recommendations
16-07	5/17/2016	NARA's Refile Processes at Selected Federal Records Centers	14
17-AUD-01	10/28/2016	Enterprise-Wide Risk Assessment Audit of NARA's Internal Controls	10
17-AUD-02	11/4/2016	Audit of NARA's Information System Inventory	8
17-AUD-03	11/4/2016	Audit of NARA's Compliance with the Federal Managers Financial Integrity Act for FY15	10
17-AUD-04	11/18/2016	Audit of NARA's Management Control over Microsoft Access Applications and Databases	5
17-AUD-05	11/11/2016	Audit of National Archives and Records Administration's Fiscal Year 2016 Consolidated Financial Statements	7
17-AUD-06	11/15/2016	Audit of NARA's Procurement Program	23
17-AUD-07	2/19/2017	Audit of NARA's Compliance with Homeland Security Presidential Directive 12	3
17-AUD-08	3/15/2017	Audit of NARA's Adoption and Management of Cloud Computing	10