Audit of NARA's Preservation Program

OIG Audit Report No. 13-08

July 9, 2013

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Executive Summary

The National Archives and Records Administration (NARA) Office of Inspector General (OIG) completed an audit of NARA's Preservation Program to determine whether (1) the Preservation Program material weakness identified seven years ago in the *Evaluation of NARA's Preservation Program* (OIG Audit Report 05-13, dated June 2005) audit still existed and (2) program controls were adequate to meet the mission of preserving Federal records.

Based on the deficiencies identified, the Preservation Program should remain a material weakness. The noted deficiencies significantly affect NARA's ability to fulfill its mission of safeguarding and preserving essential and important records of our Federal Government. Additionally, as a result of these deficiencies, records remain at risk of loss and deterioration, thereby risking availability for access and use by future generations.

During this audit we identified the following deficiencies:
- A comprehensive and cohesive strategy for addressing NARA's Preservation Program weaknesses did not exist;
- NARA is not maximizing the full benefits of risk assessments[1];
- Resources continue to be inadequate to address NARA's preservation needs; and
- Some Archival Storage Facilities may not be in compliance with Standards.[2]

Furthermore, NARA was unable to demonstrate a risk based approach was adequately used to (1) make decisions, (2) design a preservation strategy, (3) assess the current preservation environment, and (4) address the large backlog of records that require preservation actions.

Since the 2005 OIG audit, management has made some improvements to the Preservation Program. Specifically, (1) most recommendations from the audit report were implemented and (2) a risk assessment planning tool to identify the most critical preservation issues for NARA holdings was implemented. However, enough significant management action has not been taken to reduce the material weakness.

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[1] In FY 2013 the term risk assessment was changed to needs assessment.
[2] This deficiency is discussed in Audit Memorandum 13-10.

This report contains six recommendations which upon implementation will assist NARA in its efforts to implement a risk based approach for managing the Preservation Program weaknesses. While the agency is under budget constraints, the deficiencies and recommendations outlined in the report cannot be overlooked. Failure to address and implement changes could further impair NARA's Preservation Program.

Background

Title 44 of the United States Code, Chapter 21, Section 2107, states the Archivist may accept for deposit with the National Archives of the United States the records determined to have sufficient historical or other value to warrant their continued preservation by the United States Government. Section 2109 further states the Archivist shall provide for the preservation, arrangement, repair and rehabilitation, duplication and reproduction (including microcopy publication), description, and exhibition of records or other documentary material transferred to him as may be needful or appropriate, including preparation and publication of inventories, indexes, catalogs, and other finding aids or guides to facilitate their use. Section 2114 provides the Archivist may make and preserve motion-picture films, still pictures, and sound recordings pertaining to and illustrative of the historical development of the United States Government and its activities, and provide for preparing, editing, titling, scoring, processing, duplicating, reproducing, exhibiting, and releasing for non-profit educational purposes, motion-picture films, still pictures, and sound recordings in his custody.

Preservation encompasses the activities which prolong the usable life of archival records. Preservation activities are designed to minimize the physical and chemical deterioration of records and to prevent the loss of informational content. The preservation staff at NARA works together with the archivists to preserve the permanently valuable records of the Federal Government. Successful preservation efforts are part of the fulfillment of the agency's mission to "ensure continuing access to the essential documentation of the rights of American citizens and the actions of their government."

There are several offices responsible for ensuring preservation of records, including Research Services - Preservation Programs Division (RX), Research Services – Access Coordination Team for Archival Operations, Office of Innovation - Digitization Services Branch[3] (VIS), and Legislative Archives, Presidential Libraries, and Museum Services (L). The goal of RX is to ensure the records of our government are appropriately preserved so they will be available for use. RX works with staff across NARA to support and further preservation. The Division serves as a resource and offers guidance on the wide range of media in NARA's holdings, from paper and electronic records to artifacts and special media. RX strives to monitor and track risks threatening records in all formats; prioritize and implement preservation actions; specify and monitor environmental conditions in storage, processing, and exhibit spaces; specify and evaluate

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[3] On October 1, 2012 the Office of Innovation was established. As a result, Information Services - Digitization Services Branch (IDS) became Office of Innovation - Digitization Services Branch (VIS).

stable housings to hold and protect records; and ensure NARA facilities are prepared for record emergencies. RX includes the Conservation Division (RXC) and the St. Louis Preservation Division (RXS). RXC assesses the condition of records that come to NARA and stabilize and treat the documents to prepare them for digitization, exhibition, and use by researchers. They also make custom housings for large or fragile records, and teach holdings maintenance and records handling procedures. RXS cares for military and civilian records at the National Personnel Records Center (NPRC), including assessing the condition for each request for burned records from the 6.5 million that survived the 1973 fire.[4]

The Access Coordination Team for Archival Operations collaborates with RX to safeguard, identify, and mitigate risks to records to ensure their preservation for Archival Operations throughout the country. VIS provides agency-wide laboratory services and technical expertise in order to facilitate preservation and access to the content of Federal Records in NARA's custody. VIS includes preservation labs for audio, video, motion picture, and photographic imaging, microfilm, and textual records. The Presidential Libraries inspects records and other historical materials to determine the state of their preservation; identifies those requiring preservation and repair or reproduction; determines the appropriate treatment; and carries out appropriate measures on site or arranges for appropriate treatment by another NARA unit, or by contract.

Prior OIG Report

In 2005 the OIG issued an audit report titled, *Evaluation of NARA's Preservation Program* (OIG Audit Report No. 05-13, dated June 2005). In our opinion the deficiencies identified in the 2005 audit represented a material weakness affecting NARA's ability to carry out its mission of providing access to essential evidence[5]. The OIG report identified five deficiencies:
- Items needing preservation had not been identified;
- Budget and staffing was inadequate to address preservation needs in a timely manner;
- Criteria for assessing preservation needs were not consistently applied;
- Archival storage facilities were not in compliance with storage standards; and
- Preservation performance measurement data was incorrect.

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[4] In 1973 a disastrous fire at NPRC destroyed approximately 16-18 million Official Military Personnel Files. No duplicate copies of these records were ever maintained, nor were microfilm copies produced. No indexes were created prior to the fire, and millions of documents had been lent to the Department of Veterans Affairs before the fire occurred. Therefore, a complete listing of the records that were lost is not available.

[5] The agency's mission in 2005 was "NARA ensures, for the Citizen and the Public Servant, for the President and the Congress and the Courts, ready access to essential evidence."

Prior Government Accountability Office (GAO) Report

In 2010 GAO conducted a review of NARA's effectiveness in overseeing the governmentwide management of records, including its ability to preserve permanent records. GAO's report, *National Archives and Records Administration: Oversight and Management Improvements Initiated, but More Action Needed* (GAO-11-15, dated October 2011) identified NARA had a large and persistent backlog of records on paper and other media needing preservation actions and faced challenges in preserving permanent records largely because of their volume, the finite resources available, and the technological challenges posed by electronic records. The report also stated while NARA treated nearly 116,000 cubic feet of at-risk archival records in fiscal year 2009, the percentage of backlog remained constant at about 65 percent, and holdings requiring preservation grew from about 2.4 million cubic feet in 2008 to about 2.6 million cubic feet in 2009.

Objectives, Scope, Methodology

The objectives of the audit were to determine if (1) recommendations in the *Evaluation of NARA's Preservation Program* (OIG Audit Report No. 05-13, dated June 2005) were adequately implemented; and (2) program controls were adequate in order to meet the mission of preserving Federal records. In order to accomplish our objectives we:

- Interviewed NARA's now former Chief Operating Officer (COO); and representatives from Preservation Programs, Access Coordination Team for Archival Operations, Office of Presidential Libraries, and Digitization Services (IDS).
- Reviewed the status of recommendations made in the *Evaluation of NARA's Preservation Program* (OIG Audit Report No. 05-13).
- Requested and reviewed documents compiled by the offices interviewed during the audit.
- Reviewed target metrics related to preservation in the Performance Management Reporting System (PMRS).

This audit was conducted in accordance with generally accepted government auditing standards between March 2012 and January 2013[6]. These standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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[6] We conducted meetings to discuss the audit findings with the Director of RX and the Executive for Research Services in December 2012 and January 2013, respectively. In April 2013 we held an exit meeting with all of the offices to discuss the audit findings and recommendations included in this audit report.

The issuance of this audit was delayed due to other competing priorities within the OIG.

Audit Results

1. A comprehensive and cohesive strategy for addressing NARA's Preservation Program weaknesses did not exist.

Our review revealed there is no clearly defined strategic direction for NARA's Preservation Program. Specifically, (1) management has not fully implemented a cohesive preservation strategy, making it difficult to manage the wealth of existing preservation information that can be leveraged to further inform decision making and (2) no office has been delegated the authority to control preservation and make critical decisions addressing preservation agency wide. This condition exists because the agency has not developed an overall preservation strategy and preservation authority is segmented throughout the agency. Without a defined strategic direction for the Preservation Program, the agency is unable to truly articulate and address the extent of the agency's preservation problems, priorities, and required resources.

<u>Preservation Program Strategy</u>

We noted during the audit management has not developed (1) an overarching strategy for the Preservation Program and (2) detailed plans identifying the immediate, mid-range, and long-term steps, i.e. a roadmap showing the future path for the Program. Additionally, while a risk assessment tool has been implemented, management has not instituted a risk based approach to holistically assess the agency's preservation needs and design its preservation plan. An overarching strategy and roadmap provides a more effective framework for implementing preservation activities and better ensures such activities will lead to progress in preservation. Further, it ensures offices responsible for preservation are held accountable for making improvement in preservation.

We also noted there was ongoing uncertainty between the Management Control Oversight Committee (MCOC) and RX regarding the direction of NARA's Preservation Program. The MCOC believes the Preservation Program should be concentrating on the records at imminent risk of loss for FY 2013. RX differs, and believes the focus should be broader and not just focused on the records at imminent risk of loss. Although two approaches have been outlined by RX and the MCOC, key elements such as milestones, performance measures, cost, resources, roles, and responsibilities have not been established or linked to either of the approaches.

We inquired with the Director of RX about the strategy for NARA's Preservation Program and were directed to a November 2010 document created by RX titled *"Preservation for One NARA."* The document outlines RX's perspective as to four preservation strategies NARA will use to preserve holdings as a transformed agency. The following strategies are listed in the document:

- Accountability – ensure accountability for preservation of the holdings;
- Prevention – prevent damage and loss to holdings by managing risks;
- Remediation – remediate damage to holdings to permit access; and
- Leadership – provide leadership and guidance for the creation of records in formats that will ensure their preservation.

Based on the OIG's review the *"Preservation for One NARA"* is not a strategy, but rather a document broadly discussing topics related to preservation and how they will be addressed at NARA. It does not outline specific steps for the Preservation Program, including how the agency will reduce the current material weakness or address the existing backlog.

Although RX referred the OIG to the *"Preservation for One NARA"* document for the Preservation strategy, the MCOC in 2012 conveyed a different message. In February 2012 the now former COO requested (1) the preservation subject matter experts start back at square one and completely reassess and potentially rescope and redefine the Preservation Program material weaknesses and (2) development of a high level preservation strategy that could be succinctly conveyed. Then in September 2012, the MCOC decided preservation was to maintain a material weakness for FY 2013 and adjusted to also focus on records at imminent risk of loss. Specifically, Management's Year End Summary stated:

> "The more important and immediate preservation challenge is a proportionately small part of our holdings that are nearly unusable or could be lost if not treated in the next decade. Some of these textual holdings, estimated at about 150,000 cubic feet, that need laboratory conservation treatment, custom housing, digitization, or a combination of these three actions to allow safe use by researchers. In addition, there are an estimated 60,000 cubic feet of non-textual audio, video, still photo, motion picture, and cartographic holdings, many of which are at risk of media deterioration or obsolescence."

We inquired with the Director of RX about the MCOC's approach for the Preservation Program. The Director indicated she was not aware of the new direction. At a later meeting, she stated while she did not disagree with the new direction, it will not stop other work within the Preservation Program as there are other strategies that have to be considered. Although management has provided an approach for the Preservation Program for FY 2013, it appears RX is reluctant to focus on it and this could lead to the delay in preserving the records management indicated are at imminent risk of loss.

Authority over Preservation Program

We noted during our review preservation activities existed in many offices across NARA, but no one individual or office was delegated authority for preservation activities agency wide. Currently, RX, Access Coordination Team for Archival Operations, VIS, and L have authority over preservation activities within their offices. Although the offices work together with RX on deciding priorities, each office controls its own preservation activities, resources, and budget.

NARA 101, *NARA Organization and Delegation of Authority,* does not provide RX with this authority. According to NARA 101, *NARA Organization and Delegation of Authority,* RX "in collaboration with units across NARA ensures the preservation of holdings of all media types, develops preservation approaches and solutions that are technically sound, practical, and affordable for NARA program implementation, and formulates national preservation policies with the input of the Access Coordination Team and other NARA units." According to RX's Director, archival and preservation needs for the agency need to be decided collectively, but no NARA-wide preservation priorities had been identified by the offices involved in preservation. The Director of RX indicated they do not control the other offices and cannot require a unit outside of their unit to perform any preservation activities. She indicated there is a need for a central point of authority for the Preservation Program.

In absence of some type of authority between RX and the other personnel in offices performing preservation activities, RX can only (1) only request resources for areas that are under its authority and (2) provide guidance in the hopes of achieving future preservation strategies, including reducing the current backlog across the agency. The lack of an office with overarching authority (1) does not allow the Preservation Program to be managed strategically and effectively across the agency and (2) impacts NARA's ability to properly make uniform preservation decisions.

Recommendation 1

The Archivist should ensure:

a) An overarching preservation strategy is developed. The strategy should include milestones, performance measures, cost and resources, roles and responsibilities and a roadmap detailing the agency's immediate, mid-range, and long-term steps for the Preservation Program. Additionally, a risk based approach to holistically assess the agency's preservation needs and design the agency's preservation plan should be implemented.
b) An analysis is conducted of the organizational structure and responsibilities of each office involved in preservation. This should include a determination whether the preservation strategy can be effectively implemented with a decentralized structure, or if one NARA office should have authority over the entire Preservation Program.

Management Response

Management concurred with the recommendation.

Recommendation 2

The Chief Innovation Officer and Executives for Research Services and Legislative Archives, Presidential Libraries and Museum Services should ensure comprehensive preservation policies and procedures for each of their organizations are developed and/or updated.

Management Response

Management concurred with the recommendation.

2. Resources are inadequate to address preservation needs.

Although additional resources have been requested through the budget process, NARA continues to lack the resources to meet the preservation requirements of the agency. Specifically, NARA continues to have a large and persistent backlog[7] of records requiring preservation actions and lacks dedicated resources to address those actions. This condition exists because while additional resources have been requested the full extent of required resources have not been appropriately communicated to internal nor external stakeholders. Admin 201, Chapter 5, *Budget*, states NARA program offices develop budget estimates and narrative justifications, including workload estimates displayed in terms of units, FTEs and dollars for future years. Thus the Preservation Program continues to be underfunded, understaffed, and unable to address the volume of records that require appropriate preservation treatment.

<u>Funding threatens NARA's ability to adequately preserve federal records</u>

Consistent with the OIG's prior report, the Director of RX communicated more resources are needed for the Preservation Program. While specific resources were not identified, the Director indicated there is a need for people, archival, and building resources. The Director of RX also stated Preservation Program resources, priorities, and initiatives had been identified and acknowledged by the agency, but additional funding had not been received because of other agency priorities. The OIG requested copies of RX's budget submissions to identify whether requests were made for additional funding. Based upon our review, additional funding requests were made along with detailed narrative justifications for why the funding was needed (see budget information in Appendix A). Without an overarching strategy, NARA cannot properly identify the resources needed, prepare an accurate funding request for those resources, and realistically devise a plan to control the backlog.

<u>NARA's preservation backlog</u>

One of the strategic goals in NARA's 2006-2016 Strategic Plan (Revised 2009) is to preserve and process records to ensure access by the public as soon as legally possible. In order to measure NARA's success for this goal, a long-range performance target was established which states "by 2016, less than 50 percent of archival holdings require preservation action." NARA uses the *percent of archival holdings that require preservation action* target metric to measure the backlog or the extent to which NARA's non-electronic archival holdings are at risk and the extent of preservation actions taken.

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[7] In February 2013 the term backlog was changed to holdings needing preservation action.

Based on our review of the target metric and discussions with management, the agency (1) has not identified the total universe of records (textual and non-textual) that require preservation actions, (2) faces difficulty meeting the 2016 performance target as there continues to be a large number of records that need preservation actions, (3) is still relying on outdated information to measure the preservation backlog, and (4) has a significant backlog of non-textual records that need immediate preservation.

During a meeting with the Director of RX, we asked if the universe of records that require preservation actions had been identified by the agency. The Director did not agree that the agency should identify everything which needed preservation actions. The Director stated there is already more than enough preservation work identified than the resources available and RX has solid knowledge of the scope and scale of the agency's preservation needs. As a result, management may be unaware of records at risk and which require preservation.

During the audit we also reviewed the calculation for the target metric. The backlog at the end of FY 2011 and FY 2012 was 62% and 61%, respectively (see Table 1). Between FY 2006 and FY 2012[8], the agency on average decreased the percent of holdings at risk by less than one percent per year. When we interviewed the Director of RX about the backlog, she indicated (1) there is too much concentration on the term backlog and the impression in NARA the records will fall apart tomorrow, which she stated was inaccurate, (2) the backlog number is not getting more resources for the preservation program and the concentration on the backlog is taking away from what is important, (3) additional resources would help to reduce the current backlog, and (4) the agency needs to be realistic about what can be done and focusing on the term backlog is taking the agency down the wrong path. Based on the amount of records treated in FY 2012, even if no other records were identified as needing preservation, it would take approximately 28 years[9] to complete the current preservation work identified. However, even this is too optimistic of a scenario, as every year more records are identified as needing preservation, or are accessioned in state needing preservation work. This is evidenced by the fact the actual size of the backlog has grown over the last five fiscal years. With the current backlog, budget restraints, and additional records processed each year, there is a risk NARA will continue to be unable to manage the volume of records needing preservation unless resources become available to reduce the backlog in a timely manner.

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[8] At the end of FY 2012, the percent of holdings at risk was reported in PMRS as 61%. At the end of fieldwork for the audit, RX was working on applying the current results of the risk assessments to the field archives holdings as a whole. RX believed the proposed changes would result in a reduction in the overall percentage of holdings at risk. The Washington Area Archives will continue to rely on the data from the surveys instead of completed results of risk assessments.

[9] Twenty-eight years is calculated by dividing the FY 2012 start of the backlog (2,734,244 cubic feet) by the cubic footage of preservation work completed in FY 2011 (97,905 cubic feet)

Table 1: Preservation Backlog Calculation

	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010	FY 2011	FY 2012
Archival Holdings (cubic feet)	3,296,468	3,346,112	3,728,601	3,937,316	4,042,925	4,248,176	4,482,330
Preservation Backlog (cubic feet)	2,182,353	2,163,371	2,424,550	2,571,395	2,578,142	2,636,339	2,734,244
% of Holdings at Risk	66.20%	64.65%	65.02%	65.30%	63.76%	62.05%	61%
% +/-	N/A	-1.55%	0.37%	0.28%	-1.54%	-1.71%	-1.06%

We also noted the agency is still relying on outdated information to measure the preservation backlog. In 2004 the agency conducted preservation surveys of records held at the Washington Area Archives, National Personnel Records Center, and Regional Archives. One of the goals of the surveys was to characterize the nature and extent of the preservation needs of textual holdings. As a result of the surveys a starting point for the backlog calculation was defined. Although the agency now uses risk assessments to identify preservation actions, the results from the surveys are still the basis to measure the preservation backlog for the Washington Area Archives. Currently, there is more data available from the completed risk assessments, than the surveys conducted over eight years ago. Without the use of more current data on the universe of records requiring preservation actions (i.e., risk assessments, surveys, etc.), the agency faces the risk of a backlog far greater than expected.

Based on discussion with the former Director of IDS and review of documentation, there is a significant amount of non-textual records that require preservation. Additionally, there are technical limitations and infrastructure constraints that stand in the way of preserving non-textual records and making them accessible to the public. At the end of FY 2012, management identified an estimated 60,000 cubic feet of non-textual audio, video, still photo, motion picture, and cartographic holdings records that are at risk of media deterioration or obsolescence. It is possible there are more non-textual records needing preservation than the estimated 60,000. According to the former Director of IDS, the universe of non-textual records requiring preservation is unknown and they need to be physically observed and assessed to determine preservation needs. Without this knowledge it is impossible to avoid surprises, plan, and prioritize work for non-textual records.

Recommendation 3

The Archivist should ensure:

a) The Chief Innovation Officer and Executives for Research Services and Legislative Archives, Presidential Libraries and Museum Services completely identify the resources necessary to adequately accomplish NARA's preservation mission. Specifically, a comprehensive budget request for the Preservation Program outlining all resources (budget, staffing, infrastructure, etc.) should be developed along with the potential effects on the Program if the funding is not received.
b) The Chief Innovation Officer and Executives for Research Services and Legislative Archives, Presidential Libraries and Museum Services develop a plan to identify the complete universe of textual and non-textual records that require preservation.

Management Response

Management concurred with the recommendation.

Recommendation 4

The Executive for Research Services should ensure a detailed analysis is performed and communicated about the risks versus the benefits associated with not using the existing risk assessment data to calculate the backlog for the Washington Area Archives. If it is decided the existing risk assessment data will not be used, a determination should be made regarding whether a new survey is warranted to provide a current assessment of the agency's preservation needs.

Management Response

Management concurred with the recommendation.

3. NARA is not maximizing the full benefits of risk assessments.

The risk assessment is a planning tool that should enable NARA to address the most critical preservation issues by collecting information on the use, preservation problems, and needed preservation actions of NARA holdings. While NARA has implemented a more robust risk assessment process for identifying preservation actions needed, the agency lacks the ability to fully integrate and transform this data into meaningful information to more fully define and improve decision making. Specifically, risk assessments have not been completed for all archival holdings or been used to develop work plans, preservation strategies, and performance metrics for management analysis. Further, when completing risk assessments, the criterion used for the records estimated level of use is not considered reliable, and all of the risk assessments are not recorded in HMS. This condition exists because management has not put a process in place to effectively utilize the information from the risk assessments. Failure to capitalize on the full benefits of the risk assessments does not allow management the opportunity to make informed decisions on short-term and long-term strategies, or make investments in technologies aligned with the agency's most critical preservation needs.

In our last audit report, *Evaluation of NARA's Preservation Program* (OIG Audit Report 05-13), we reported NARA's methodology to identify textual at-risk records across the agency was not adequate. We noted the methodology at that time did not ensure assessment of the entire inventory and was based on inconsistently applied and in some cases outdated criteria. One of our recommendations was for NARA to refine the methodology and employ resources to survey, identify, document, and rank NARA records needing preservation. In response to our recommendation NARA developed an agency-wide program of risk assessment. The risk assessments are now completed in the At-Risk WebLog and HMS (Holdings Management System), an integrated technology platform designed to support the physical management of permanent, hard-copy archival records in the custody of NARA. Risk assessments are completed during accessioning, processing, anytime a preservation need is discovered, and when a preservation action is completed and a risk assessment does not exist.

The risk assessment is used to rank the records into risk levels of (1) Immediate Risk of Loss, (2) High Risk, (3) Medium Risk, (4) Low Risk, and (5) No Preservation Action Needed at this Time. The factors used to determine the risk levels include:

- current and anticipated use;
- inadequate housing, which leads to physical damage and intrusion of dust;
- condition problems such as tape, folds, and broken parts, which impede access and safe handling;
- continued deterioration and inherent instability, which leads to the loss of information, and requires cold storage, conservation treatment and / or reformatting; and
- obsolescence of format and potential unavailability of playback equipment for machine readable holdings, which means some records may not be able to be played or copied.

(See Appendix B for guidance used when selecting the risk levels in HMS for textual, still pictures, and cartographic records.)

Risk Assessments have not been completed for all holdings

Although the risk assessment tool was implemented, we noted risk assessments have not been completed for a significant amount of archival holdings. In May 2012, there were 4,383,055 cubic feet of archival holdings. Risk assessments had not been completed for 1,904,820 (71%) and 159,816 (12%) cubic feet of archival holdings of the Washington Area Archives and field locations, respectively. Also, risk assessments had not been completed for 186,087 (42%) of the Presidential Libraries artifacts. The Presidential Libraries and Washington Area Archives had the highest percentage of holdings without risk assessments, while the archival field locations (including NPRC) had completed risk assessments for the majority of their archival holdings (See Table 2). According to RX, there is no goal to have risk assessments completed for all archival holdings because:

1. RX states there are not enough resources to perform outstanding risk assessments;
2. RX values the quality of the data very highly;
3. RX does not want to encourage staff to rush through risk assessments without examining some of the records;
4. RX believes it does not benefit NARA holdings to identify all of the needs, but rather NARA should make progress on meeting those needs already identified; and
5. RX states enough preservation actions have been identified for RX to document their work plans for years.

While it may not be reasonable to complete risk assessments for all archival holdings, the current percentage of holdings without risk assessments is a significant risk as there maybe records where the agency does not know the risk rating, but critical preservation problems exist.

Table 2: Percentage of risk assessments completed (as of May 2012)

	Archival Holdings (cubic feet)	Archival Holdings with Completed Risk Assessments (cubic feet)	% of Risk Assessments Completed
Washington Area Archives Textual, Center for Legislative Archives, Non-textual	2,681,288	776,468	29%
Presidential Libraries - Artifacts	445,265	259,178	58%
Archival Field Locations	1,369,716	1,209,900	88%

Preservation work plans and strategies

During our review we noted once the risk assessments are completed, they were not relied on by the agency to help prioritize projects and guide preservation strategies and decisions. We were informed of a meeting between the former COO and the Director of RX where the Director indicated the risk assessments were not relied on to develop work plans. When questioned about this during the meeting, the Director responded she did not trust the risk assessment work performed by staff in the field. This statement is a contradiction to the work performed by RX as they were responsible for developing and implementing the risk assessment guidance, and with training those completing the risk assessments. Also, under the leadership of the Director, Preservation Reviews have been performed to support local staff and Central office staff in identifying, prioritizing, and addressing preservation needs. As a part of the reviews, risk assessments were repeated by RX employees to validate the risk assessment data. According to RX, the Presidential Libraries have filled out the risk assessments correctly with only minor changes needed. Research Services risk assessments are less accurate because assessors are not expected to look through every box. Accordingly, it is difficult to comprehend the statements made by the Director. Significant time and resources have been dedicated by the Director's group to train employees and perform reviews of a process which was created and implemented by her group. Further, significant resources have been used to develop HMS for it to document items needing preservation and consistently apply criteria for assessing preservation needs, among other needs of the agency. Unless the information gathered by risk assessments is used in a meaningful way, these resources may have not been put to good use.

Performance metrics

We noted no additional performance metrics have been implemented to allow management to monitor activity within the Preservation Program. RX identified new metrics in FY 2012, but Performance and Accountability communicated the metrics were not necessarily meaningful output or outcome measures. This is not the first time we indicated management needed to develop additional metrics. During the 2005 audit, we recommended management consider adding another performance measurement metric to capture performance on medium and low-risk projects. Management concurred with the recommendation. After the issuance of the audit report, management decided not to define a new metric to capture performance on medium and low risk projects. Management concluded (1) PMRS is not the appropriate place to track preservation work done for each level of at-risk projects, (2) PMRS is a public metric and tracking three levels for public reporting is simply too confusing for those not intimately involved in preservation discussions, and (3) tracking preservation work on records originally identified as medium or low risk is a more complex management task appropriate for reporting on internal management processes. The completed preservation work by risk level data is now available in HMS, but there is still no metric used to identify preservation work completed by risk levels (see Table 3 which shows Holdings Received Preservation Action by Risk Level for FY 2012).

Table 3: Holdings Received Preservation Action by Risk Level for FY 2012 (cubic feet)

FY 2012	Archives I and Archives II in HMS	Archival Field Locations using HMS as of June 2013	Non-textual at Archives II	Total	%
Immediate	31	31	-	62	-
High	15,816	36,473	7	52,296	53%
Medium	18,351	2,811	1	21,163	21%
Low	22,002	3,736	-	25,738	26%
Total	56,200	43,051	8	99,259	

Additionally, there were no measurements to monitor archival holdings with risk assessments completed by risk category within HMS and the At-Risk WebLog. The data is available and the OIG was able to request and review it during the audit (see Table 4 which shows risk assessments completed by risk levels). The additional measurements would allow management once again to make decisions and develop strategies related to preservation. Without the metrics, NARA officials continue to review the Preservation Program without critical and valuable information that would help them make more informed decisions.

Table 4: Cubic Feet Needing Action Broken Down by Risk Level from Risk Assessments (as of May 2012)

Risk Level	Archival Holdings with Risk Assessments Completed (cubic feet)	% of Risk Level
Immediate Risk of Loss	8,039	1%
High Risk	664,230	62%
Medium Risk	160,964	15%
Low Risk	238,652	22%

Record Usage

In the 2005 audit report, we noted different criteria existed to define record usage applied as a basis to identify whether a record needed preservation treatment for the Washington Area Archives, Presidential Libraries, and Regional Archives. We recommended NARA determine and utilize a consistent usage criterion for all NARA records. As a result of the recommendation, a consistent criterion was created and all archivists now use the same criteria. Archivists now use the following three levels determining estimated level of use:

- High Use – records are generally used at least 3 times per year
- Medium Use – records are generally used 1 or 2 times per year
- Low Use – records are generally used less than once per year

Although consistent criterion exists, the process for determining use is subjected to the archivist's judgment. During our interviews with personnel from the Archival Field Locations, comments were made about how artificial and problematic the current process is for the use data. Currently, there is no way to determine how often records are used as there is no circulation modules implemented to track usage of archival holdings. Therefore, the determination is based on an archivist's judgment of how often the record group is used or will be used. Until a mechanism to capture actual data about use is implemented, archivists' judgment will continue to be the source for this information. Without the mechanism to capture actual data about use, there is the risk the criterion is not being appropriately applied.

HMS and At-Risk WebLog

We noted at the end of FY 2012 Denver, St. Louis, Presidential Libraries, and Special Media (Cartographic and Still Pictures) were still using the At-Risk WebLog and Non-text Risk Assessment Database (Special Media only) to document risk assessments while all other divisions were using HMS. Denver, St. Louis, and Special Media (Cartographic and Still Pictures) are expected to transition to HMS in FY 2013. The Presidential

Libraries indicated they will assess in the future if and when they will move to HMS. HMS was implemented to combine in a single system the archival functionality that was distributed across multiple systems (both manual and automated) throughout the agency. It is inefficient for the agency to have two different systems to record the risk assessments as current analyses are manually performed and subject to human error. Additionally, future processes (e.g. circulation data) could be affected if the agency continues to run two separate systems.

Recommendation 5

We recommend the Executive for Research Services should ensure:

a) An analysis is performed to determine if additional risk assessments for the Washington Area Archives and Presidential Libraries, including older holdings, should be completed. Identify the risks for not completing the assessments.
b) Additional measureable performance metrics are developed and implemented to track the progress within the Preservation Program.
c) A cost benefit analysis for the HMS Circulation Module is completed. Request required resources if the cost benefit analysis identifies benefits to the agency.
d) Denver, St. Louis, and Special Media (Cartographic and Still Pictures) implement HMS to record risk assessments.

Management Response

Management concurred with the recommendation.

Recommendation 6

The Executive for Legislative Archives, Presidential Libraries and Museum Services should ensure an analysis is performed to identify whether HMS should be implemented across the Libraries. If it is decided HMS will be implemented, a timeline should be established. If it is decided HMS will not be implemented identify (1) how the existing system will meet the agency's preservation needs and (2) obstacles and risks for not implementing HMS.

Management Response

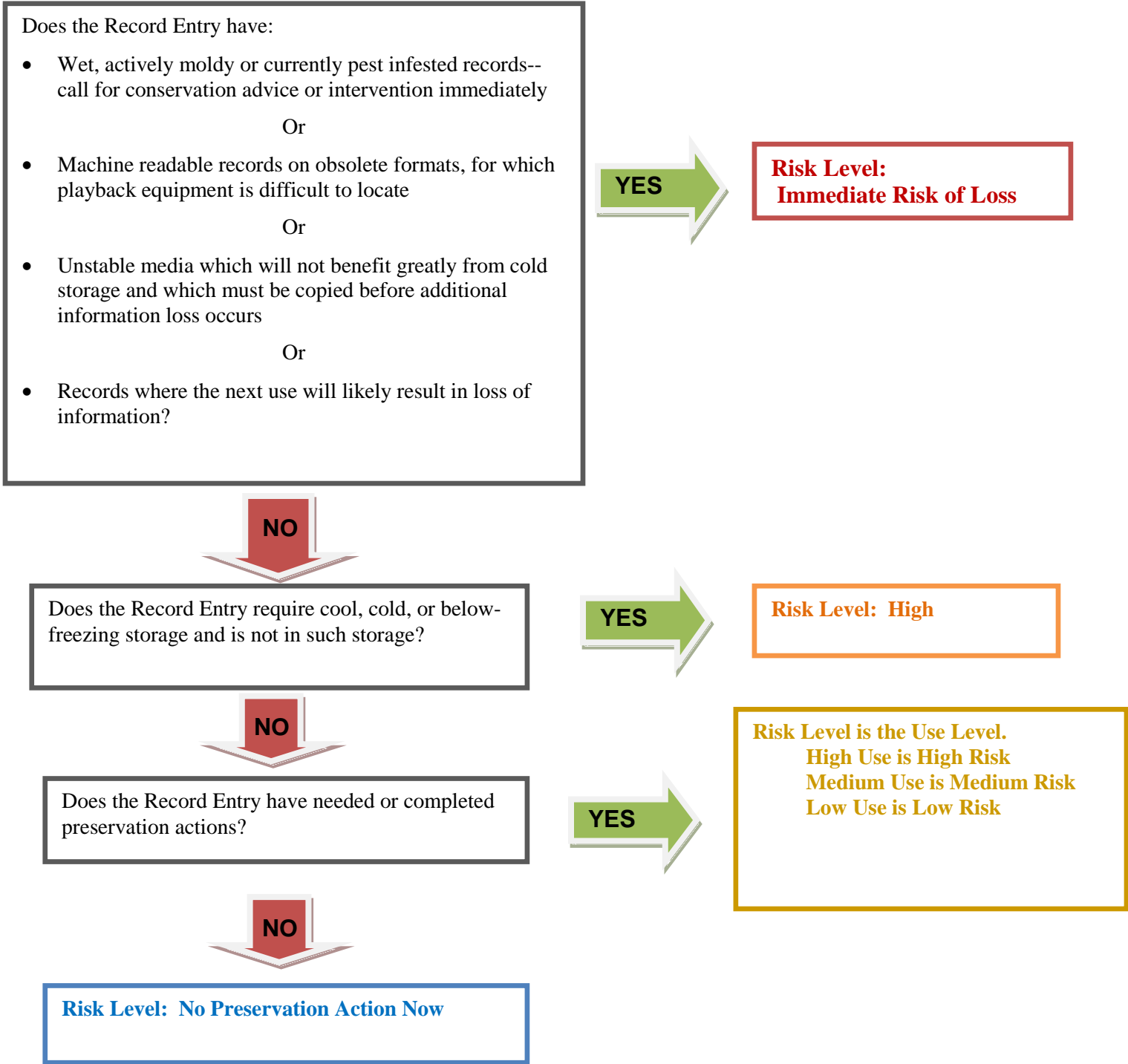Management concurred with the recommendation.

Appendix A – Preservation Budget Requests[10]

Fiscal Year	Budget Request	OMB Request	Funded	Name of Strategic Budget Initiative	Narrative Justification Excerpts from Strategic Budget Initiative Requests
2007	$5,965,318 (12 FTEs)	$4,525,000 (12 FTEs)	$0	Preserving NARA's Textual Records	Due to fragility, unstable paper and inks, previously inadequate storage environments and/or extensive research use, many Federal textual records have become damaged and the information they contain is at immediate risk of being lost.
2008	$4,498,352 (8 FTEs)	$4,500,000 (8 FTEs)	$0	Transition from Analog to Digital Reformatting of Records	Without additional resources, we will not be able to transition our preservation reformatting workflows to digital technology, and therefore, we will not be able to prevent the loss of information due to the deterioration of physical materials, due to the obsolescence of machine dependent formats (audio, video recordings, motion pictures), and due to the damage caused by the frequent handling of original records.
2009	$4,570,000 (18 FTEs)	$2,200,000 (10 FTEs)	$0	Preserving America's Records	NARA requires additional resources so it can succeed in its mission both to preserve the nation's archival holdings and to provide access. Otherwise the citizens of the United States will lose information that allows them to have a full and open understanding of the work of the Federal Government and its democratic processes, the work of our Presidents and the rights, entitlements and history of all citizens.
2010	$2,179,334 (11 FTEs)	$0	$0	Preserving and Digitizing America's Records	NARA does not have sufficient resources to adequately protect and address the most critical needs of the ten billion pages of archival holdings, special media records and artifacts that document the history of our Government and our nation and that protect the rights of the citizens. Without the requested funding, the citizens of the United States will lose access to information that allows them to have a full and open understanding of the work of the Federal Government and its democratic processes, the work of our Presidents and the rights, entitlements and history of all citizens. Records on fragile and deteriorating formats and on rapidly obsolete formats are most vulnerable to loss. The funding will enable NARA to manage the resources fundamental to NARA's mission.
2011	$2,602,977 (14 FTEs)	$0	$0	Digitization by NARA	As a result of this initiative NARA will improve its efficiency in servings its constituents, further agency preservation goals and increase the number of records that can be stored off site.
2012	$1,800,000 (3 FTEs)	$0	$0	Focus on Preservation	Additional resources are required to address the most critical preservation needs of the permanent federal records located in NARA's 30 archival and library facilities across the nation. The records that are at risk of significant deterioration include special media records, textual records and artifacts that document the history of our Government and our nation and that protect the rights of the citizens.

[10] This chart represents new funding requested only. RX's base budget for FY 2007 – FY 2012 was $4,891,000.

Appendix B – Selecting the Risk Level in HMS For Textual, Still Picture, and Cartographic Record

Does the Record Entry have:

- Wet, actively moldy or currently pest infested records-- call for conservation advice or intervention immediately

  Or

- Machine readable records on obsolete formats, for which playback equipment is difficult to locate

  Or

- Unstable media which will not benefit greatly from cold storage and which must be copied before additional information loss occurs

  Or

- Records where the next use will likely result in loss of information?

YES → **Risk Level: Immediate Risk of Loss**

NO ↓

Does the Record Entry require cool, cold, or below-freezing storage and is not in such storage?

YES → **Risk Level: High**

NO ↓

Does the Record Entry have needed or completed preservation actions?

YES → **Risk Level is the Use Level.**
High Use is High Risk
Medium Use is Medium Risk
Low Use is Low Risk

NO ↓

Risk Level: No Preservation Action Now

Appendix C – Acronyms and Abbreviations

COO	Chief Operating Officer
GAO	Government Accountability Office
HMS	Holdings Management System
IDS	Information Services – Digitization Services Branch
L	Legislative Archives, Presidential Libraries, and Museum Services
MCOC	Management Control Oversight Committee
NARA	National Archives and Records Administration
NPRC	National Personnel Records Center
OIG	Office of Inspector General
PMRS	Performance Measurement and Reporting System
RX	Preservation Programs Division
RXC	Conservation Division
RXS	St. Louis Preservation Division
VIS	Office of Innovation – Digitization Services Branch

Appendix D – Management's Response to the Report
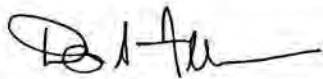
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Date: JUN 27 2013

To: James Springs, Acting Inspector General

From: David S. Ferriero, Archivist of the United States

Subject: OIG Revised Draft Audit 13-08, Audit of NARA's Preservation Program

Thank you for the opportunity to provide comments on this draft report. We appreciate your willingness to meet and clarify language in the report.

We concur with the six recommendations in this audit.

If you have any questions or need additional information on these comments, please contact Mary Drak by phone at 301-837-1668 or via email at mary.drak@nara.gov.

David S. Ferriero
Archivist of the United States

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Appendix E – Report Distribution List

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