



December 20, 2018

TO: David S. Ferriero
Archivist of the United States

FROM: James Springs *James Springs*
Inspector General

SUBJECT: *Audit of Presidential Libraries' Analog Processing*
OIG Audit Report No. 19-AUD-03

This memorandum transmits the results of our final report entitled, *Audit of Presidential Libraries' Analog Processing*. We have incorporated the formal comments provided by your office.

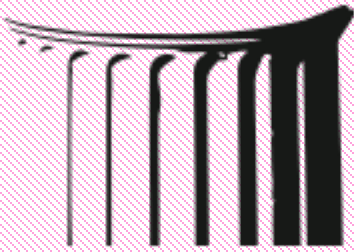
The report contains six recommendations, which are intended to strengthen the Office of Presidential Libraries' internal control environment. Your office concurred with all of the recommendations. Based on your December 14, 2018 response to the final draft report, we consider all the recommendations resolved and open. Once your office has fully implemented the recommendations, please submit evidence of completion of agreed upon corrective actions so that recommendations may be closed.

As with all OIG products, we determine what information is publically posted on our website from the attached report. Consistent with our responsibility under the *Inspector General Act, as amended*, we may provide copies of our report to congressional committees with oversight responsibility over the National Archives and Records Administration.

We appreciate the cooperation and assistance NARA extended to us during the audit. Please call me or Jewel Butler, Assistant Inspector General for Audits, with any questions.

Attachment

cc: Debra Wall, Deputy Archivist of the United States
William Bosanko, Chief Operating Officer
Chris Naylor, Deputy Chief Operating Officer
Micah Cheatham, Chief of Management and Administration
Susan Donius, Acting Executive for Legislative Archives, Presidential Libraries, and
Museum Services
Kimm Richards, Accountability
United States House Committee on Oversight and Government Reform
Senate Homeland Security and Governmental Affairs Committee



OFFICE *of*
INSPECTOR GENERAL
NATIONAL ARCHIVES

Audit of Presidential Libraries' Analog Processing

December 20, 2018

OIG Audit Report No. 19-AUD-03

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Executive Summary

Audit of Presidential Libraries' Analog Processing

OIG Report No. 19-AUD-03

December 20, 2018

Why Did We Conduct This Audit?

In 2013, the Office of Inspector General (OIG) performed an audit of the National Archives and Records Administration's (NARA) Processing Program where the audit determined the Processing Program to be a material weakness. Our audit objective was to determine 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. Specifically, we assessed Presidential Libraries' analog processing program, after conducting a Fiscal Year (FY) 2018 audit of the analog processing program in Research Services.

What Did We Recommend?

We made six recommendations to strengthen the Office of Presidential Libraries' (LP) internal control environment.

What Did We Find?

The OIG found multiple internal control weaknesses continue to exist in the processing program at the Presidential Libraries including not fully implementing and applying NARA's Processing Policy, unsupported PMRS metrics, and a lack of standardized controls over monitoring and reporting of performance goals. These conditions occurred because of a lack of management control and sufficient oversight from management on the processing program. The Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government* states management enforces accountability of individuals performing their internal control responsibilities. Accountability is driven by the tone at the top and supported by the commitment to integrity and ethical values, organizational structure, and expectations of competence, which influence the control culture of the entity. As a result, LP's processing program is not administered consistently and effectively. Further, NARA lack assurance progress toward completion of its strategic processing goal is accurately measured and reported

Additionally, the OIG faced delays and difficulty in obtaining documentary and testimonial evidence throughout the audit process. This condition occurred as Presidential Libraries staff was unresponsive, unprepared, or unwilling to fulfill OIG requests for information. The *Inspector General Act of 1978, as amended*, states each Inspector General is authorized to have timely access to all records available to the agency. As a result, the OIG could not fully execute its audit program to answer all audit objectives and assess all aspects of LP's analog processing program.

Background

According to Title 44 United States Code (U.S.C) § 2203, upon the conclusion of the President's term of office, or if a President serves consecutive terms upon the conclusion of the last term, the Archivist of the United States shall assume responsibility for the custody, control, and preservation of, and access to, the Presidential records of that President. The National Archives and Records Administration's (NARA) 2014-2018 Strategic Plan included processing initiatives under the agency's first strategic goal – Make Access Happen. In order to achieve the goal, NARA stated it would accelerate processing of analog and digital records to quickly make its records available to the public. To continue the initiative, NARA included a processing goal in its 2018-2022 Strategic Plan, specifically stating NARA will process 82 percent of holdings by Fiscal Year (FY) 2021 to enable discovery and access by the public.¹ Progress in processing its holdings is captured in NARA's Performance Management and Reporting System (PMRS) metric, which measures the extent to which NARA has made its holdings reasonably available to researchers.

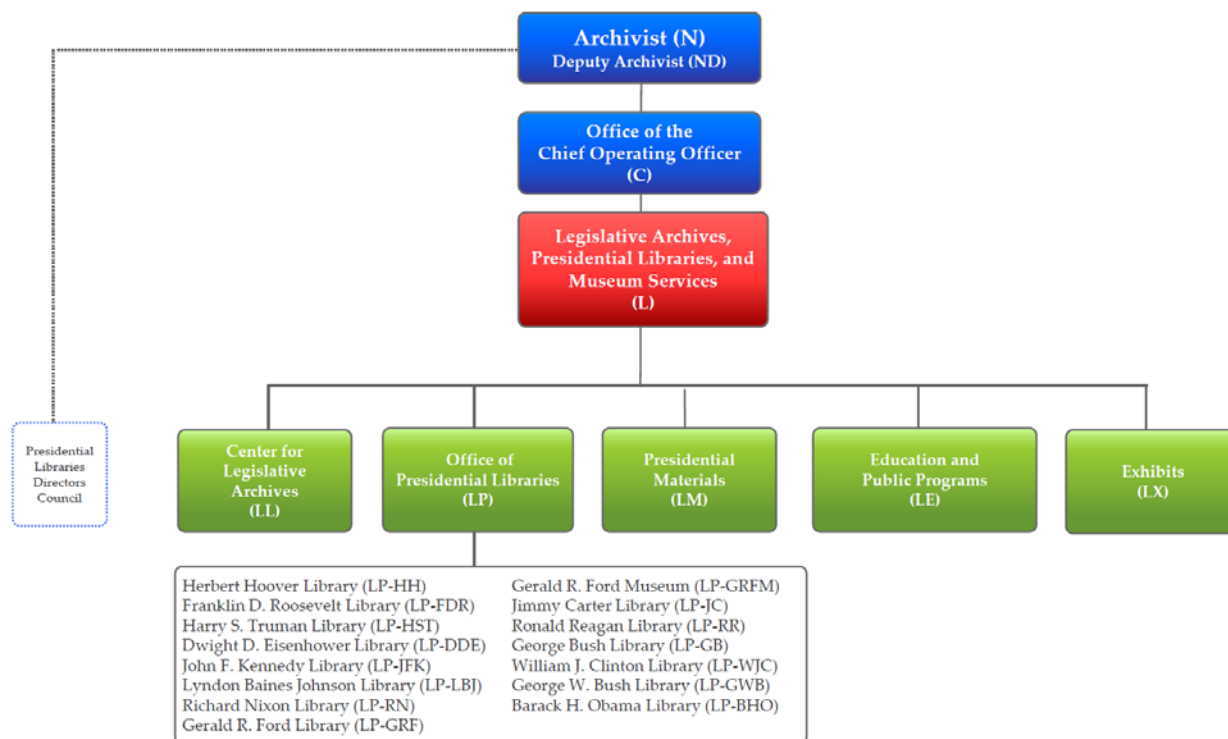
On March 8, 2016, NARA's Chief Operating Officer (COO) issued NARA's *Analog Records Processing Policy* (Processing Policy), which includes a single definition of processing for all analog records, descriptions of two levels of processing, and threshold conditions for processing completion. NARA processes records to provide physical and intellectual control over its permanent holdings, and to effectively manage records as valuable assets, protect them, make them more accessible, ensure that federal laws and policies are followed, and to preserve them for future use. Records are processed at the point where a researcher can discover their existence. NARA has a two-tiered definition for Processing: Basic and Augmented. Records are considered processed at the basic level when necessary actions are completed for a series to meet basically acceptable standards of physical and intellectual control. Basic processing addresses three fundamental goals: (1) provide physical control of the holdings; (2) enable discovery and access to the holdings; and (3) assure safe use of holdings. NARA lists eight standards for a series to meet to be considered processed at the basic level.² Augmented processing is any processing work performed above the basic level, and reflects, in part, the work required to apply access restrictions at an item level before sensitive materials can be made available for public access.

Processing is conducted by Office of Presidential Libraries (LP) staff in 14 locations throughout the country.

¹ At the end of FY18, NARA had collectively reported processing 79.41 percent of its traditional (analog) records.

² Those standards are: (1) Materials Housing; (2) Labeling; (3) Arrangement; (4) Access Restrictions; (5) Disposition Status; (6) Physical Control; (7) Intellectual Control; and (8) Finding Aids.

Legislative Archives, Presidential Libraries, and Museum Services



In FY17, LP reported spending an estimated \$3.3 million on both basic and augmented processing work. As of June 2018, LP reported via PMRS almost 90 percent of all holdings were processed at the basic level. Individual Libraries reported processing percentages between 34.60³ percent and 98.42 percent. Under NARA’s Internal Control Program (ICP), LP was required to annually perform a risk assessment of all its functions, and report quarterly on internal controls. Those quarterly reports lead up to the annual assurance statement. In both FY17 and FY18, LP assessed the risk to their processing program as low. In the final FY17 ICP Report, LP indicated the internal control monitoring plan results showed all Presidential Libraries (Libraries) were in compliance. This report led to an Office of Legislative Archives, Presidential Libraries, and Museum Services management official certifying controls in place were adequate and functions were being monitored appropriately.

NARA’s Office of Inspector General (OIG) audited NARA’s Processing Program in Audit Report No. 13-14, *Audit of Processing of Textual Records*.⁴ The audit reported NARA’s processing backlog to be approximately 40% of its textual holdings and acknowledged while NARA made significant strides in reducing the processing backlog over the last four years, additional effort was still needed to reduce the material weakness and strengthen NARA’s

³ This percentage is from the Obama Library, which only received records in January 2017.

⁴ This audit was a follow-up report to OIG Audit Report No. 07-06.

processing program. Specifically, the report found the need for NARA to adjust its strategic direction of processing needs, a lack of, and inaccurate performance measures, and either lacking or outdated policies and procedures. The report made 14 recommendations, seven of which were still open at the start of the current audit in June 2018. Further, the OIG previously conducted an audit focused specifically on Research Services' Analog Processing (OIG Audit Report 18-AUD-11), which together with this report on Presidential Libraries' Analog Processing, serve as the OIG's follow-up to OIG Audit Report No. 13-14.

Objectives, Scope, Methodology

The objective of the audit was to determine 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, and to evaluate the impact of digitization on processing. To accomplish our audit objective, we identified and reviewed the following documentary evidence:

- NARA's FY 2014-2018 and FY 2018-2022 Strategic Plans;
- NARA's *Analog Records Processing Policy*;
- The Government Accountability Office (GAO)'s *Standards for Internal Control in the Federal Government*;
- Office of Management and Budget (OMB) Circular No. A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*
- Title 44 U.S.C § 2203, *Management and custody of Presidential records*;
- *Inspector General Act of 1978, as amended*;
- NARA Directive 101, *Organization and Delegation of Authority, Part 9, Office of Legislative Archives, Presidential Libraries, and Museum Services*;
- NARA Directive 161, *NARA's Internal Control Program*, and related appendices; and
- NARA Interim Directive 164-1, *Internal Controls for the Performance Management and Reporting System (PMRS) Data*.

Further, we reviewed FY17 and FY18 ICP Reports; FY17 and FY18 Risk Assessments; organizational charts; PMRS metrics; and various internal documentation. We obtained testimonial evidence from NARA personnel in the Office of Legislative Archives, Presidential Libraries, and Museum Services. We obtained physical evidence through observation of processing conducted at the George Bush 41 Presidential Library (Bush 41).

This performance audit was conducted in accordance with generally accepted government auditing standards between September 2017⁵ and September 2018 at Archives II in College Park, MD and College Station, TX. The generally accepted government auditing 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

⁵ This audit began in September 2017 as an audit of both Research Services and Presidential Libraries' Analog Processing. Initial fieldwork was conducted within LP through November 30, 2017 when the OIG decided to focus separately on the two offices and issue two separate audit reports. Therefore, fieldwork within LP was postponed until June 2018.

obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This performance audited was conducted by William Brown, Senior Program Auditor.

Audit Results

Finding. Multiple Internal Control Weaknesses in Processing Program

The OIG found multiple internal control weaknesses continue to exist in the processing program at the Presidential Libraries including not fully implementing and applying NARA's Processing Policy, unsupported performance metrics, and a lack of standardized controls over monitoring and reporting of performance goals. These conditions occurred because of a lack of management control and sufficient oversight from management on the processing program GAO's *Standards for Internal Control in the Federal Government* states management enforces accountability of individuals performing their internal control responsibilities. Accountability is driven by the tone at the top and supported by the commitment to integrity and ethical values, organizational structure, and expectations of competence, which influence the control culture of the entity. As a result, LP's processing program is not administered consistently and effectively. Further, NARA lacks assurance progress toward completion of its strategic processing goal is accurately measured and reported.

NARA's Processing Policy

NARA issued its *Analog Records Processing Policy* on March 8, 2016. On March 10, 2016, an LP management official issued a memorandum to all Library Directors concerning the new policy and how the policy would impact the Libraries. The memorandum stated basic and augmented processing would be implemented. It also stated basic processing essentially includes all the processing steps usually taken, except an access review, while augmented processing includes all basic processing steps, plus the access review. Further, the memorandum informed the Libraries that reported processing totals would come from basic processing. During preliminary audit meetings, the OIG was informed NARA's policy had not affected how Libraries processed, only how they reported. An archivist at a Presidential Library in 2015 would process the exact same way presently, despite NARA policy on processing being implemented in 2016.

GAO's *Standards for Internal Control in the Federal Government* states management documents in policies for each unit its responsibility for an operational process's objectives and related risks, and control activity design, implementation, and operating effectiveness. Each unit, with guidance from management, determines the policies necessary to operate the process based on the objectives and related risks for the operational process. Each unit also documents policies in the appropriate level of detail to allow management to effectively monitor the control activity. NARA Directive 101 Part 9 states the Director of Presidential Libraries develops policies and procedures for the management and operation of Presidential Libraries.

According to a former LP management official, the Libraries were also directed to implement NARA's policy in their processing manuals. The OIG's review of processing manuals found every Library, except Clinton, had NARA's processing policy or excerpts from the policy in their manuals. However, some Libraries included the policy within their manual as an appendix, with no references to the policy or processing definitions contained within the body of the manual's procedures. Other Libraries included the policy within the body of the manual, but would transition to describing the procedures for processing actually used at the Library. The OIG was informed the processing policy had no impact at the Bush 41 Library, and no specific basic processing projects had been performed there.

Processing Performance Metrics

The OIG found LP exercised no management oversight into the reported processing percentages in PMRS. The OIG determined NARA's processing policy was incorrectly interpreted in reporting processed holdings. We were unable to obtain support for reported processing percentages, and through our testing found holdings marked as processed did not meet basic processing standards. OMB Circular A-123 states management is responsible for establishing and maintaining internal controls to achieve specific internal control objectives related to operations, reporting, and compliance. Also, GAO's *Standards for Internal Control in the Federal Government* states management performs ongoing monitoring of the design and operating effectiveness of the internal control system as part of the normal course of operations. Ongoing monitoring includes regular management and supervisory activities, comparisons, reconciliations, and other routine actions. As a result, the OIG cannot attest to the accuracy and reliability of the reported PMRS metric.

LP staff responsible for internal control monitoring told the OIG the Libraries were to report complete and accurate information for the processing PMRS metric. NARA Directive 101 Part 9 states the Director of Presidential Libraries ensures individual Presidential Libraries meet their archival processing and review goals. However, LP staff seemed unaware, or unwilling to inform the OIG of how those percentages were calculated, what support was available, and what systems were used in tracking basic processing percentages. The Bush 41 Library stated they reported the processing metric to PMRS as required, but stated LP staff had never contacted them concerning their data reporting numbers, either with positive or negative feedback.

Policy. When announcing the new NARA processing policy to the Libraries, LP issued LP16-11, *Revised Performance Reporting Definition of Processing*. The memorandum stated basic processing essentially includes all the processing steps usually taken to process holdings, except to conduct the access review, and it is progress in completing these essential steps, which Libraries are now required to report as processed totals.⁶ Attached to the memorandum were

⁶ Until issuance of the memorandum, the definition of processing used for Presidential Library holdings generally required that materials be reviewed for public access before the materials can be considered processed.

both the NARA processing policy and the revised PMRS metric.⁷ Both documents list the eight standards of basic processing which must be met before holdings can be considered processed. The effect of the memorandum was significant gains in reported processed holdings in FY16. For example, the Bush 41 Library reported it had processed 48.88 percent of total holdings at the end of FY15. With the change in reporting definition, the Library reported it had processed 81.57 percent of its holdings at the end of FY16, a 32.69 percent gain.⁸ However, the increase in processed holdings was not caused by work performed by the Library throughout the year. Instead, as explained below, was the result of a one-time estimate.

The OIG found the Bush 41 Library only considered one basic processing standard – condition of records housing – when determining its processed holdings for PMRS reporting. When complying with the LP16-11 memorandum in April 2016, the Bush 41 Library staff calculated an estimated percentage of holdings in archival boxes, which the Library reported to PMRS as processed. Thereby, the Bush 41 Library disregarded the other seven standards in its reported estimate of its basic processing percentage. The Bush 41 Library stated a misinterpretation of NARA’s processing policy caused the incorrect calculation of basic processing percentage. It is likely other Libraries may not have correctly applied all eight basic processing standards when reporting basic processing percentages. LP believed Libraries reviewing their reported totals in PMRS monthly was sufficient to verify the new reported percentages.

Support. Part of the audit steps designed by the OIG for this audit was an analysis of the PMRS metric and review of the supporting data for the PMRS metric to gain assurance as to the accuracy and reliability of the metric as reported by LP. To accomplish these audit steps, the OIG requested data supporting the PMRS processing metric. As discussed later (see Other Matter section), the OIG was unable to obtain sufficient supporting documentation to analyze the metric and determine its accuracy and reliability. NARA Interim Directive 164-1, *Internal Controls for the Performance Management and Reporting System (PMRS) Data*, defines internal controls as the activities and tools managers use to ensure figures reported to PMRS can be verified by an audit. NARA Directive 101 Part 9 states the Director of Presidential Libraries develops, coordinates, and monitors overall plans and programs for the Presidential Libraries. However, the OIG was unable to verify any of the percentages during this audit due to unresponsiveness of LP. While the Bush 41 Library could explain how the estimate of basic processing was calculated, the Bush 41 Library was unable to provide documentation of the data used in the assessment. There is no evidence LP was aware of how each Library calculated its reported totals and what supporting documentation was used to verify the totals.

Testing. The OIG performed audit testing at the Bush 41 Library on randomly selected holdings the Library reported as being processed, to determine if the holdings met all basic processing

⁷ The metric measures the extent to which NARA has made its holdings reasonably available to researchers, and defines records being processed when the records meet the eight standards for basic processing.

⁸ Libraries collectively reported a 36.22 percent increase in total processing percentage from FY15 to FY16.

standards.⁹ The first (of two) boxes of holdings tested found two issues: (1) the labeling on the box was incorrect; and (2) no description of the holdings existed in the National Archives Catalog (NAC). Therefore, the box did not meet basic processing standards, and should not have been reported as processed.

Library Processing Goals

The OIG was informed by an LP management official each Library's processing goal for FY18 was 79 percent processed in line with NARA's Strategic Goal for processing. However, all Libraries, with the exception of the newly created Barack Obama Library, reported a processing percentage greater than 79 percent at the end of FY17. An OIG analysis found for each Library to fall back under a reported 79 percent processed figure would require a significant increase to existing holdings at the Libraries, which is not expected. Therefore, every Library had already essentially met the processing goal for FY18 before the year even started. When the OIG asked Bush 41 management about the 79 percent processed goal, those staff members were unaware such a goal existed. Bush 41 Library management informed the OIG they sought to achieve a 600,000 page processing goal in FY18 at the direction of LP. Similar page processing goals were reported in processing plans from other Libraries. However, despite receiving both documentary and testimonial evidence from LP management concerning Library processing goals, the OIG was never made aware of any goal requiring Libraries to track pages processed.

Quality Control Procedures

LP management stated there was not a central, LP-wide direction on how to perform quality control procedures, and any quality control procedures for the accuracy of processing would be localized. LP management could not explain any specific localized procedures to the OIG. The OIG found the Bush 41 Library had quality control procedures in place for the review of completed Freedom of Information Act (FOIA)¹⁰ processing work. However, these procedures were not documented in a formal policy or procedure at the Library. Further, those quality control procedures did not have requirements for review of completion of basic processing standards. For example, the Library staff reviewed the processed work for compliance with FOIA and FOIA exemptions used, but would not have reviewed the holdings to determine if there was a finding aid or description. Based on discussions during the site visit between the OIG and Bush 41 Library management, the Bush 41 Library updated its processing manual to include their FOIA quality control procedures. The OIG's review of other Library processing manuals found quality control procedures relating to processing were not included.

⁹ The results of our testing cannot be projected to the population.

¹⁰ Presidential records are subject to FOIA under the Presidential Records Act of 1978. Staff at Presidential Libraries receive and respond to FOIA requests.

ICP Reporting

LP management also stated quality control procedures for accuracy of processing were performed through the ICP. LP instructed each Library to perform a five percent check of their processed holdings and complete a checklist documenting the work. Each year, without exercising any management oversight, LP staff concluded the five percent check indicated all Libraries were in compliance. While LP staff accepted the submitted checklists at face value, the OIG could not verify a five percent check of holdings occurred at each Library. Support provided for the five percent check was not clear. There was no way to determine how most Libraries selected the five percent of holdings to check, nor the universe of holdings (e.g. total holdings, recently processed holdings) from which the five percent was selected. Most Libraries provided a summary checklist with very little supporting detail.¹¹ For the FY17 fourth quarter check, the Bush 41 Library stated five percent of holdings processed during the year were selected at random for review. However, the Bush 41 Library was unable to provide the OIG documentation of the selection methodology, including which specific holdings were checked. Further, three Libraries found instances in their checks where their processed holdings did not meet basic processing standards. These three Libraries reported they made corrections to the mistakes found. The direction given to the Libraries from LP did not require the Libraries to check other holdings for similar mistakes if errors were found.

Also, despite digitization being a major initiative of the agency and digitization work occurring in multiple Presidential Libraries, an LP digitization function is not identified through ICP reports or risk assessments. NARA Directive 161 requires Executives to ensure the internal control framework (e.g. programs, functions) accurately reflects the structure and responsibilities of their office. Appendix B to NARA Directive 161 states the purpose of the internal control framework is to arrive at the programs and functions reflective of the offices' work and around which risk and controls will be assessed. Without identifying digitization as a function of LP, LP management may not be sufficiently evaluating risks, identifying weaknesses, and assessing and monitoring controls related to digitization.

Recommendations

We recommend the Executive for Legislative Archives, Presidential Libraries, and Museum Services:

Recommendation 1: Implement procedures to ensure consistent implementation of NARA's Processing Policy across all Presidential Libraries.

Management Response

The Executive for Legislative Archives, Presidential Libraries, and Museum Services will appoint a working group to develop standard operating procedures for consistent

¹¹ The Clinton Library's supporting documentation appeared to be sufficient and might be used as a standard format.

implementation of NARA's processing policy related to basic processing across all Presidential Libraries. The Executive will review and approve the standard operating procedures. The standards will be added to each Library's processing manual and to Libraries 1401, the Presidential Libraries Manual.

Target Completion Date: December 31, 2019

OIG Analysis

We consider NARA's proposed actions responsive to our recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above.

Recommendation 2: Implement procedures to ensure consistent and accurate reporting of basic processing totals across all Presidential Libraries.

Management Response

The Executive for Legislative Archives, Presidential Libraries, and Museum Services will appoint a working group to develop standard operating procedures that will ensure consistent and accurate reporting of basic processing totals across all Presidential Libraries, including instructions for creating auditable documentation for information supporting each month's PMRS entries. The Executive will review, approve and disseminate the standard operating procedures.

Target Completion Date: December 31, 2019

OIG Analysis

We consider NARA's proposed actions responsive to our recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above.

Recommendation 3: Direct all Presidential Libraries to assess their holdings to determine the correct percentage of basic processing work as stipulated in NARA's *Analog Records Processing Policy*.

Management Response

The Executive for Legislative Archives, Presidential Libraries, and Museum Services will work with each Library to assess how the current PMRS number of holdings processed at the basic level was derived and will work to correct inaccuracies.

Target Completion Date: December 31, 2019

OIG Analysis

We consider NARA's proposed actions responsive to our recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above.

Recommendation 4: Implement procedures for quality control review of processed holdings across all Presidential Libraries.

Management Response

The Executive for Legislative Archives, Presidential Libraries, and Museum Services will appoint a working group to develop standard operating procedures for quality control review of basic processing. The Executive will review and approve the standard operating procedures. The standards will be added to each Library's processing manual and to Libraries 1401, the Presidential Libraries Manual.

Target Completion Date: December 31, 2019

OIG Analysis

We consider NARA's proposed actions responsive to our recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above.

Recommendation 5: Implement procedures to require adequate support for ICP reporting.

Management Response

The Executive for Legislative Archives, Presidential Libraries, and Museum Services will appoint a working group to develop standard operating procedures that support reporting of the basic processing function in the Internal Control Program (ICP). The procedures will include directions for creating auditable documentation for the information supporting ICP reporting.

Target Completion Date: December 31, 2019

OIG Analysis

We consider NARA's proposed actions responsive to our recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above.

Recommendation 6: Identify digitization as a function of LP and follow all reporting instructions under NARA Directive 161 and related appendices.

Management Response

The Executive for Legislative Archives, Presidential Libraries, and Museum Services will add digitization as a function to the ICP database tool for LP.

Target Completion Date: June 30, 2019

OIG Analysis

We consider NARA's proposed actions responsive to our recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above.

Other Matter – Delays and Difficulties Obtaining Audit Information Requests

The OIG faced delays and difficulty in obtaining documentary and testimonial evidence throughout the audit process. This condition occurred as Presidential Libraries staff was unresponsive, unprepared, or unwilling to fulfill OIG requests for information. The *Inspector General Act of 1978, as amended*, states each Inspector General is authorized to have timely access to all records available to the agency. As a result, the OIG could not fully execute its audit program to assess all aspects of LP's analog processing program.

The OIG understands its requests for information during an audit may take time to compile and submit given employees tasked with providing information have other duties and responsibilities. However, the time taken to receive requests during this audit was unreasonable. The Office of Presidential Libraries (LP) management provided some materials available to them within the first three weeks of the audit restarting. However, there were multiple outstanding requests not provided. LP knew the audit would be restarting in FY18, yet was unprepared to provide documentation. The OIG requested some information requiring analysis or calculations from LP. However, the majority of information requested was documentation LP or individual Libraries had already created or calculated (e.g. policies, procedures, supporting data, reports).

The OIG raised the issue to the Acting Executive for Legislative Archives, Presidential Libraries, and Museum Services. Despite the Acting Executive stating the OIG's access concerns would be discussed with staff, the OIG still did not receive responses or information concerning response times. However, the information was still not provided over a month after the audit restart. In a subsequent meeting with LP management, the OIG learned LP had not yet asked individual Presidential Libraries for documentation. The OIG was informed it would take at least three weeks for the Libraries to provide documentation, which should have been readily available. The OIG received responses to all initial requests more than two months after the information was requested. The two-month gap between initial requests being made and responses being provided significantly delayed and impacted audit work.

The best example of unresponsiveness is the information provided by Presidential Libraries for the OIG request for "data supporting Performance Management and Reporting System (PMRS) metrics concerning processing." This issue of unresponsiveness on PMRS data goes back to before the OIG postponed the audit in November 2017. Despite multiple requests and meetings with different individuals in LP over a three-month period in early FY18, the OIG never received the requested information. When restarting this audit in June 2018, the OIG requested the information on PMRS data again. The OIG twice clarified its request to multiple LP officials during the audit. Despite the OIG believing management understood the request, the response the OIG received two months after requesting the data was not responsive, as it contained no supporting data. As a result, the OIG could not complete audit steps concerning LP's PMRS processing metric and related controls.

Appendix A – Acronyms

Acronym	Definition
COO	Chief Operating Officer
FOIA	Freedom of Information Act
FY	Fiscal Year
GAO	Government Accountability Office
ICP	Internal Control Program
LP	Office of Presidential Libraries
NAC	National Archives Catalog
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
PMRS	Performance Measurement and Reporting System
U.S.C.	United States Code

Appendix B – Management Response



Date: DEC 14 2018
To: James Springs, Inspector General
From: David S. Ferriero, Archivist of the United States
Subject: Action Plan to OIG Report 19-AUD-03, *Audit of Presidential Libraries' Analog Processing*

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

We acknowledge that there were challenges in receiving the requested information from the Office of Presidential Libraries. The Acting Executive for Legislative Archives, Presidential Libraries, and Museum Services looks forward to working with the Office of Presidential Libraries to improve operations and control of basic processing and to ensure that information is provided to you in a timely manner for future audits.

We concur with the six recommendations in this audit, and in response, the attachment provides a summary of our proposed actions. As each recommendation is satisfied, we will provide documentation to your office. If you have questions about this action plan, please contact Kimm Richards at kimm.richards@nara.gov or by phone at 301-837-1668.



DAVID S. FERRIERO
Archivist of the United States

Attachment

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**Action Plan Response to OIG Report 19-AUD-03,
Audit of Presidential Libraries' Analog Processing**

Recommendation 1: We recommend the Executive for Legislative Archives, Presidential Libraries, and Museum Services implement procedures to ensure consistent implementation of NARA's Processing Policy across all Presidential Libraries.

Planned Action: The Executive for Legislative Archives, Presidential Libraries, and Museum Services will appoint a working group to develop standard operating procedures for consistent implementation of NARA's processing policy related to basic processing across all Presidential Libraries. The Executive will review and approve the standard operating procedures. The standards will be added to each Library's processing manual and to Libraries 1401, the Presidential Libraries Manual.

Target Completion Date: December 31, 2019

Recommendation 2: We recommend the Executive for Legislative Archives, Presidential Libraries, and Museum Services implement procedures to ensure consistent and accurate reporting of basic processing totals across all Presidential Libraries.

Planned Action: The Executive for Legislative Archives, Presidential Libraries, and Museum Services will appoint a working group to develop standard operating procedures that will ensure consistent and accurate reporting of basic processing totals across all Presidential Libraries, including instructions for creating auditable documentation for information supporting each month's PMRS entries. The Executive will review, approve and disseminate the standard operating procedures.

Target Completion Date: December 31, 2019

Recommendation 3: We recommend the Executive for Legislative Archives, Presidential Libraries, and Museum Services direct all Presidential Libraries to assess their holdings to determine the correct percentage of basic processing work as stipulated in NARA's *Analog Records Processing Policy*.

Planned Action: The Executive for Legislative Archives, Presidential Libraries, and Museum Services will work with each Library to assess how the current PMRS number of holdings processed at the basic level was derived and will work to correct inaccuracies.

Target Completion Date: December 31, 2019

Recommendation 4: We recommend the Executive for Legislative Archives, Presidential Libraries, and Museum Services implement procedures for quality control review of processed holdings across all Presidential Libraries.

Planned Action: The Executive for Legislative Archives, Presidential Libraries, and Museum Services will appoint a working group to develop standard operating procedures for quality control review of basic processing. The Executive will review and approve the standard operating procedures. The standards will be added to each Library's processing manual and to Libraries 1401, the Presidential Libraries Manual.

Target Completion Date: December 31, 2019

Recommendation 5: We recommend the Executive for Legislative Archives, Presidential Libraries, and Museum Services implement procedures to require adequate support for ICP reporting.

Planned Action: The Executive for Legislative Archives, Presidential Libraries, and Museum Services will appoint a working group to develop standard operating procedures that support reporting of the basic processing function in the Internal Control Program (ICP). The procedures will include directions for creating auditable documentation for the information supporting ICP reporting.

Target Completion Date: December 31, 2019

Recommendation 6: We recommend the Executive for Legislative Archives, Presidential Libraries, and Museum Services identify digitization as a function of LP and follow all reporting instructions under NARA Directive 161 and related appendices.

Planned Action: The Executive for Legislative Archives, Presidential Libraries, and Museum Services will add digitization as a function to the ICP database tool for LP.

Target Completion Date: June 30, 2019

Appendix C – Report Distribution List

Archivist of the United States
Deputy Archivist of the United States
Chief Operating Officer
Deputy Chief Operating Officer
Chief of Management and Administration
Executive for Legislative Archives, Presidential Libraries, and Museum Services
Accountability
United States House Committee on Oversight and Government Reform
Senate Homeland Security and Governmental Affairs Committee

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