NATIONAL ARCHIVES

OFFICE *of* INSPECTOR GENERAL

SEMIANNUAL REPORT *to* CONGRESS

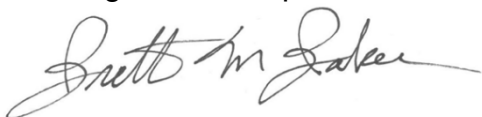### APRIL 1, 2024 *to* SEPTEMBER 30, 2024

Message from the Inspector General

On behalf of the National Archives and Records Administration (NARA) Office of Inspector General (OIG), I am pleased to present this Semiannual Report to the Congress covering the six-month period ending September 30, 2024. Our work reflects the legislative mandate of the Inspector General Act, which is to prevent and detect, fraud, waste, and abuse through the conduct of audits, evaluations, and investigations relating to NARA programs and operations. During the reporting period, our office issued seven audit or evaluation reports with recommendations to improve agency operations. In addition, we issued two Reports of Investigation to the agency that helped ensure integrity and accountability. I am honored for the opportunity to lead the audit, investigative, and support staff who do this important oversight work.

During the reporting period, our office conducted work on six audit reports and one evaluation that included 44 recommendations designed to help improve NARA's programs and operations. We also closed 50 previously open recommendations. There were 222 open recommendations at the end of the reporting period and we continue to work closely with the agency as they implement corrective actions. More information on our audit work can be found in the Audits section of this report. Our investigative activities continued to focus attention on ensuring integrity in NARA operations and programs. We also developed four investigative priorities to focus our resources on the highest risks to agency programs and operations. Allegations deemed threats to the health and safety of people will receive the highest priority, followed by threats to, or affecting, NARA work sites. Our next tier of investigative priorities will focus on crimes against the irreplaceable historical and culturally significant holdings entrusted to NARA. All other investigative efforts will focus on mitigating fraud, waste, abuse and misconduct within the agency's programs and processes. During the reporting period, the OIG received 278 new complaints. While many of these matters were not actionable, we opened 15 investigative matters and closed 9 others.

NARA OIG is committed to helping the agency maximize the integrity, efficiency, and effectiveness of NARA programs and operations, and our audits, evaluations, and investigations, and other activities highlighted in this report demonstrate our ongoing commitment. Further, our success would not be possible without the collaborative efforts between the OIG, NARA, and Congress to promote effective stewardship of agency programs and operations. I thank all parties for their dedication, and I look forward to continued cooperation as we work together to ensure the integrity and efficiency of agency operations. I also look forward to working with the Archivist of the United States, Dr. Colleen Shogan, as she leads the agency's important records management and preservation mission.

Dr. Brett M. Baker
Inspector General

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Executive Summary

This is the 71st Semiannual Report to Congress summarizing the activities of the National Archives and Records Administration (NARA) Office of Inspector General (OIG).

Audits and Reports

The Office of Audits continued to assess the economy and efficiency of NARA's programs and operations and to examine NARA's Information Technology (IT) systems. During the reporting period, the OIG issued seven reports:

1. Audit of NARA's Compliance with the Payment Integrity Information Act of 2019 in Fiscal Year (FY) 2023
2. Audit of NARA's Information Security Oversight Office
3. Audit of NARA's Records Preservation Efforts
4. Audit of NARA's FY 2024 Federal Information Security Modernization Act Audit
5. Audit of NARA's Office of the Chief Records Officer Records Management Oversight and Reporting
6. Audit of NARA's Cloud Computing Services
7. Evaluation of NARA's Controls over Records Relocation

At the end of the reporting period six audits were in process. During this period, we tracked $131,816 in questioned costs and $2,663,966 in funds to be put to better use.

Investigations

The Office of Investigations receives and evaluates complaints and conducts investigations related to fraud, waste, and abuse in NARA programs and operations. The OIG may also issue reports detailing specific issues or vulnerabilities. These reports are focused overviews of potential issues used to alert management. In this period, we received and reviewed 278 complaints and other intake actions, and opened 15 new investigative matters.

Photo: National Archives II Panoramic. NARA Identifier 184341499.

Audits and Reports

During this reporting period, the OIG issued the following seven final reports. The information below is based on results at the conclusion of field work, as depicted in the final reports. It is possible that NARA may have made improvements and/or addressed some of the issues after such time. *Please click on the title of any report below to be taken to the full report on our website.*

Audit and Evaluation Summaries

Audit of NARA's Compliance with the Payment Integrity Information Act of 2019 (PIIA) in FY 2023

We contracted with Sikich CPA LLC (Sikich) to perform an independent audit of NARA's Compliance with the PIIA in FY 2023. For FY 2023, NARA complied with the requirements of the Payment Integrity Information Act of 2019 (PIIA). As required, NARA published the Agency Financial Report in FY 2023 and included improper payments information in accordance with payment integrity guidance provided in OMB Circular A-136 and posted the report and accompanying materials as required on its website with a link to paymentaccuracy.gov. NARA conducted an improper payment risk assessment for each program with annual outlays greater than $10 million at least once in the last three years, and adequately concluded whether the program is likely to make improper payments (IPs) and unauthorized payments (UPs) above or below the statutory threshold. Not all PIIA reporting requirements were applicable to the agency. The report included no recommendations. (OIG Audit Report No. 24-AUD-04, dated May 29, 2024)

Audit of NARA's Information Security Oversight Office

We contracted with Williams, Adley & Company-DC, LLP (Williams Adley) to conduct a performance audit of NARA's Information Security Oversight Office (ISOO). The audit objectives were to (1) determine the effectiveness of ISOO's information security oversight program as it relates to its role of establishing policy and oversight of the government-wide classified national security information (CNSI) system and Controlled Unclassified Information (CUI) from January 1, 2021, through June 30, 2023; and (2) identify best practices and potential improvements to the ISOO's information security oversight program to better achieve its mission. While ISOO has policy and oversight functions of the CNSI and CUI programs, the audit found certain challenges exist that affect ISOO's ability to effectively standardize and assess the management of the programs. Specifically, ISOO did not fully document the internal control processes over data collection and the internal control processes over the CUI program. Also, ISOO does not have a fully defined and documented CNSI Monitoring Methodology. Lastly, ISOO did not carry out all the responsibilities of the CUI program executive agent (EA). These challenges may result in (1) difficulties ensuring all CNSI and CUI agencies are subject to data collections and results are timely, accurately and completely captured in annual reporting; (2) limited ability to support ISOO's current monitoring activities are effective at ensuring agency compliance with the executive orders; and (3) inefficiencies in transitioning monitoring responsibilities to other personnel restricting ISOO's ability to effectively carry out its responsibilities per the executive orders. Williams Adley issued six recommendations to assist ISOO in its efforts to improve program management and oversight capabilities. (OIG Report No. 24-AUD-05, date June 27, 2024)

Audit of NARA's Records Preservation Efforts

We contracted with Williams Adley to conduct a performance audit of NARA's Records Preservation Efforts. The audit concluded that although NARA has made progress in

implementing procedures to ensure holdings are preserved and available for use as well as addressing open recommendations, the audit noted certain findings that affect its ability to safeguard and preserve records. Specifically, the audit noted the following:

1. The Preservation Programs Division did not conduct sufficient preservation reviews of NARA facilities.
2. NARA does not have a standardized methodology to determine priority for records preservation action needs.
3. NARA facilities' Emergency Preparedness and Records Emergency Response Recovery Plans (Plans) do not include all required elements from NARA Directive 1561.9. Also, NARA facilities were not reviewed annually by facility director/administrator and records emergency management team leaders. Furthermore, the Preservation Program does not have consistent control across all facilities to maintain evidence of annual review of the Plans.
4. The Preservation Programs Division did not accomplish all strategic goals set forth in the Preservation Strategy 2019-2024.

These findings may result in 1) an increased risk of deterioration of records stored in NARA facilities; 2) significant backlog of preservation actions, inconsistent preservation practices, inefficiencies in resource allocation, and reactive approach to preservation; and 3) increased risk of valuable historical records being damaged, destroyed, or lost during emergencies such as fires, flood, or other disasters, and delays in responding to emergencies. Therefore, the audit made eight recommendations to assist NARA in its efforts to address the identified weaknesses. (OIG Report No. 24-AUD-06, dated August 15, 2024)

[Audit of NARA's FY 2024 Federal Information Security Modernization Act](#)

We contracted with Sikich to perform an independent audit of NARA's information security program and practices in accordance with FISMA for FY 2024. The audit was conducted to assess the effectiveness of NARA's information security program in accordance with FISMA and applicable instructions from [IG FISMA Reporting Metrics](#). Sikich concluded NARA's information security program was "Not Effective." Specifically, NARA achieved an overall maturity level of Level 3: *Consistently Implemented.* We noted that one functional area achieved a maturity level of Level 1: *Ad Hoc*, one functional area achieved a maturity level of Level 2: Defined and three functional areas achieved a maturity level of Level 3: Consistently Implemented for an overall maturity level of Level 3: *Consistently Implemented* for the security program.

Sikich made three new recommendations and 13 repeat recommendations from prior year FISMA audits (which have missed their targeted completion dates) to help NARA address challenges in its development of a mature and effective information security program. (OIG Report No. 24-AUD-07, dated September 27, 2024)

[Audit of NARA's Office of the Chief Records Officer Records Management Oversight and Reporting](#)

We contracted with Sikich to perform an independent audit of NARA's Office of the Chief Records Officer Records Management Oversight and Reporting (ACO). ACO has opportunities

to improve its inspection selection process, the documentation supporting the analyses that it performs as part of its inspections, and its program management information system. First, the audit found that ACO did not always select agencies for inspection based on required criteria. Second, the audit found that ACO did not sufficiently document the analyses supporting its findings and recommendations for our sample of six inspections. Third, the audit found that the program management information system ACO relies on for monitoring the effectiveness of its oversight projects was incomplete. Specifically, ACO had not entered information for 5 projects reflecting oversight at 28 agencies. By developing a formal selection process that incorporates required criteria, requiring inspection teams to maintain documentation supporting their analyses, and integrating data entry into teams' workflow, ACO will be better able to effectively carry out its records management oversight responsibilities. Sikich made five recommendations to strengthen NARA's inspection process. (OIG Report No. 24-AUD-08, dated September 30, 2024)

<u>Audit of NARA's Cloud Computing Services</u>

We contracted with Sikich to perform an independent audit of NARA's Cloud Computing Services. Overall, the audit found that NARA generally has effective governance processes in place to manage its cloud computing services. However, NARA has opportunities to improve management of its cloud computing management program. First, the audit found that NARA is still in the process of completing its enterprise data inventory. Without a complete inventory of data used in NARA's systems, there is a potential for data to be insufficiently secured. In addition, visibility into all existing cloud data helps to promote efficiency and effectiveness of NARA's operations, by identifying duplicate data collections which can be consolidated. Further, NARA may be maintaining data sets which are no longer needed and can be disposed. Second, the audit found that NARA can improve its monitoring activities of service level agreements for its cloud computing services. Without centralized monitoring procedures for service level agreements, NARA is not able to consistently determine if a contractor is providing the level of service agreed upon in the contract. Furthermore, NARA may not be consistently monitoring performance measures, responding to missed metrics, and enforcing penalties, all of which could lead to inefficient use of resources and disruption to NARA's operations. The audit resulted in four recommendations aimed at strengthening NARA's management of its cloud computing environment. (OIG Report No. 24-AUD-09, dated September 30, 2024)

<u>Evaluation of NARA's Controls over Records Relocation</u>

We contracted with Sikich to perform an independent evaluation of NARA's Controls over Records Relocation. The evaluation found that NARA's Research Services and the Federal Records Center Program (FRCP) did not fully comply with the Performance Work Statement (PWS) requirements for the relocation of records. Not fully complying with PWS requirements resulted in insufficient validation and confirmation of the actual quantities of records moved, and limited assurance that records were shelved in the correct spaces, in the proper order, and without loss or damage. Sikich made six recommendations to strengthen NARA's controls over records relocation. (OIG Report No. 24-R-10, dated September 30, 2024)

Audits and Reports

<u>Other Audits and Evaluations In Progress</u>

<u>Audit of NARA's FY 2024 Financial Statements:</u> To express an opinion on whether NARA's financial statements are fairly presented, in all material aspects, in conformity with accounting principles generally accepted in the United States of America.

<u>Audit of NARA's Office of Human Capital Hiring Practices:</u> To assess the effectiveness of NARA's Office of Human Capital hiring practices.

<u>Audit of NARA's Purchase Card Program:</u> To determine whether NARA's Purchase Card Program adequately designed and appropriately implemented internal controls to effectively deter fraud, waste, or abuse; had effective oversight and management; and was operating in compliance with applicable laws, regulations, and agency policies.

<u>Audit of NARA's Security Management:</u> To evaluate the efficiency and effectiveness of NARA's Security Management program.

<u>Audit of NARA's Compliance with OMB Memorandum M-23-07:</u> To determine NARA's compliance with OMB Memorandum M-23-07 requirements including timely issuance of updated guidance and regulations and NARA's process for granting exceptions to the memorandum requirements. We will also examine NARA's preparedness to accept electronic records.

<u>Audit of NARA's Research Room Activities:</u> To evaluate controls in place at selected research rooms.

Investigations

Investigations Overview

The OIG receives and evaluates complaints and conducts investigations related to fraud, waste, and abuse in NARA programs and operations. This includes investigating wrongfully alienated NARA holdings, such as missing and stolen records. Investigations showing violations of law, regulations, rules, or contract terms may result in administrative, civil, or criminal actions. These can include things such as terminations, suspensions and debarments, prison terms, probation, fines, restitution, and other actions. The OIG may alert management to potential problems or vulnerabilities through other reports if a full investigation is not warranted or appropriate. For this reporting period there are no investigations of whistleblower reprisal, or investigations of senior government employees[1], to report.

Significant Investigations and Updates

Activists Plead Guilty to Vandalism at Archives Rotunda
On February 14, 2024, two activists dumped a fine red powder over the U.S. Constitution's display case in the Rotunda of NARA's building in Washington, DC. The powder was not toxic, and there was no permanent damage to the collection or to the facility, but response, clean-up, and restoration costs are expected to run in the tens of thousands of dollars. Both persons were apprehended at the scene, subsequently indicted and ultimately pled guilty. The defendants have been banned from NARA facilities for at least one year. Sentencing is scheduled for November 8, 2024.

NARA Employee Terminated due to Cyber Stalking Activity
The OIG opened an investigation into an allegation that a NARA employee was cyberstalking a former personal acquaintance. Our investigation substantiated the allegation and, although the Office the United States Attorney declined to prosecute the matter, the employee's employment with NARA terminated. The now-former employee was issued a restraining order, and was arrested by agents of federal law enforcement on a separate stalking allegation.

Applicant for Sensitive Position Provides False Information about Military Service
The OIG assisted a component of the U.S. Department of State with investigation of an individual who provided false information about their military service, thereby gaining employment with the Department for which they would not have otherwise qualified. The subject was arrested on a Federal arrest warrant for making false statements to the United States Government wherein they uttered a fraudulent DD-214 to the U.S. Department of State as part of a preemployment hiring process.

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[1]A senior government employee is defined as anyone occupying a position classified at or above GS-15, or for those not on the General Schedule, whose rate of basic pay is equal to or greater than 120% of the GS-15 minimum.

Investigations

NARA Employee Terminated for False Statement on Employment Application
A NARA OIG investigation determined that an employee had failed to disclose three prior felony arrests, including one conviction, on their employment application documents. Although prosecution was declined by the Office of the United States Attorney, the employee's NARA employment was terminated during this reporting period.

Investigations of Senior Officials
None this reporting period.

OIG Hotline

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

Hotline Activity for the Reporting Period	
Hotline and Complaints received	278
Hotline and Complaints referred to NARA and other parties	61

National Archives Building Photos. NARA Identifier 184341383.

Veteran's Records Request Backlog

The National Personnel Records Center (NPRC) is the central repository of personnel-related records for both the military and civil services of the United States Government. The NPRC is one of NARA's largest operations with over 700 employees. For an estimated 56 million veterans, the NPRC stores more than 2 million cubic feet of military personnel and medical records in paper form. Prior to 2020, the NPRC processed approximately 1.2 million requests annually, or approximately 23,000 requests each week, most of which staff completed within 10 working days. In March 2020, NARA closed all facilities across the country to help limit the spread of Coronavirus Disease 2019 (COVID-19). This unprecedented move dramatically impacted operations as the NPRC was closed, except for essential staff responding to high-priority requests when records were necessary for burials, medical emergencies, and homeless veterans.

The NPRC's backlog of unprocessed veteran records requests grew from a normal work in process level of approximately 55,569 at the beginning of the COVID-19 pandemic restrictions on March 23, 2020 to as high as 603,663 on March 14, 2022. On January 24, 2024 NARA put out a press release reporting they had eliminated the pandemic related backlog, and as of September 30, 2024 they reported they had 35,694 pending requests for veteran's records at the NPRC. At NARA's current capacity of processing 36,000 requests per week, this represents about six days worth of work. Due to requests coming in every day, NARA has always had pending records requests at the NPRC. However in FY2024 NPRC serviced more than 1.6 million requests, the largest number of requests the NPRC has ever completed in a single year. During FY 2024 NPRC received an average of 27,700 requests per week, which is a significant increase from its pre-pandemic average of 21,000 weekly requests. This represents an increase of 348,000 requests for the year over its typical annual receipts. The increase in demand is attributed to recent legislation expanding the rights and benefits of veterans.

Factors causing the NPRC's backlog included limited onsite staffing due to facility occupancy restrictions in place from March 2020 to February 2022, and the NPRC having limited remote processing capabilities. With assistance from other entities like the Department of Veteran's Affairs and additional effort such as hiring and working additional shifts, the NPRC was able to eliminate the backlog as stated above. Although the backlog has been eliminated and NPRC's responsiveness now exceeds its pre-pandemic performance, there remain opportunities for even further improvement to services for America's estimated 18.5 million living veterans.

In a previous reporting period the OIG issued an evaluation to assess the backlog of records requests at the NPRC and make recommendations to reduce the backlog and improve the process moving forward. This was done after the OIG identified the backlog as a Top Management Challenge and received a request from the House of Representatives Committee on Oversight and Reform (COR) on October 20, 2021 to conduct an evaluation of the factors contributing to the backlog at the NPRC, NARA's efforts to resolve it, and make recommendations for improvements. Our report included three findings and seven recommendations to improve management oversight and accountability over the backlog. Management indicated they had no comments for inclusion in the report. The findings and associated recommendations are:

Finding 1.   NPRC Continues to Maintain a Veteran Records Request Backlog Despite Efforts to Resolve It

Recommendation 1: Develop a plan and timeline to eliminate the backlog.[2]

Recommendation 2: Collaborate with the Office of Human Capital to improve the current hiring processes at the National Personnel Records Center, develop workforce strategies to build the National Personnel Records Center workforce of the future, and enhance National Personnel Records Center employee retention strategies.[3]

Finding 2.   Opportunities Exist for NPRC to Improve its Records Request Fulfillment Processes Moving Forward

Recommendation 3: Assess the feasibility of implementing an automated system allowing veterans or their representatives to access their records online.

Recommendation 4: Implement controls to require digital delivery of responses on all requests where digital delivery is possible.

Recommendation 5: Update eVetRecs to: ensure the online request process requires requesters provide all information and documentation needed to ensure the request can be filled during initial processing; implement controls to better ensure acceptable entries for requesters' name and provide automated address fields; and ensure eVetRecs has clear attestation language at key points in the record request process to better ensure the request is being made by the veteran or an authorized representative.

Recommendation 6: Update Archives.gov to communicate the status of the backlog to veterans and emphasize other potential sources.[4]

Finding 3.   Additional Controls Needed to Manage the Increase of Medical Emergency Requests

Recommendation 7: Reconsider the National Personnel Records Center's definition of medical emergency, make any necessary changes to policy, communicate the definition to veterans and stakeholders, and implement procedures for how medical emergency requests are made and how they are validated.

This information is provided in accordance with section 5301(b)(3) of the James M. Inhofe National Defense Authorization Act for FY 2023.

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[2] This recommendation was closed July 2023.

[3] This recommendation was closed December 2023.

[4] This recommendation was closed July 2023.

Other Activities

Other Efforts With NARA

In addition to audits and investigations, the OIG continued other work, including running the Whistleblower Protection Coordinator program, processing 29 requests for OIG records under the Freedom of Information Act (FOIA) including a request in litigation, providing suggestions to improve NARA issuances, and responding to 26 requests for reviews of proposed legislation, Office of Management and Budget (OMB) regulations, congressional testimony, and other items.

Involvement in the Inspector General Community

The Council of Inspectors General on Integrity and Efficiency (CIGIE) is an independent entity within the executive branch created to address integrity, economy, and effectiveness issues that transcend individual agencies and aid in establishing a professional, well-trained, and highly skilled workforce in the federal OIGs. While the Inspector General is a member of CIGIE, many staff are involved in CIGIE groups and issues, such as providing community-wide training for new OIG managers and Inspectors General. The Inspector General is the CIGIE Audit Committee Vice Chair and is on the Legislative, Budget, Investigation, and Tech Committees while being involved with others. OIG staff are active in, or associated with, a multitude of CIGIE committees and groups. In this reporting period the Counsel to the Inspector General was asked to give multiple presentations on IG Authorities to new IGs.

Peer Review Information

Peer Review of NARA OIG's Audit Organization

The most recent peer review of the NARA OIG audit function was performed by the Federal Communications Commission OIG. In its report issued March 16, 2023, the NARA OIG received a peer review rating of pass for its system of quality control for the year ended September 30, 2022. The next peer review of the OIG's audit function is planned for FY 2026.

The peer review report's accompanying letter of comment, while not affecting the overall opinion, was designed to further strengthen our system of quality control. In response to the letter of comment, we committed to completing recommended actions by June 30, 2023, and we did.

Peer Review of NARA OIG's Office of Investigations

In January 2023, a team of special agents from the Pension Benefit Guaranty Corporation (PBGC) OIG conducted a comprehensive review of the Office of Investigations' operations in accordance with CIGIE's "Quality Standards for Investigations." On March 27, 2023, PBGC's team found our system of internal safeguards and management procedures for investigations to be in full compliance with all applicable guidelines and regulations. There are no outstanding recommendations from this review.

In this reporting period, NARA OIG investigative staff conducted and completed a CIGIE-mandated peer review of the *AmeriCorps* Office of Inspector General's Office of Investigations. NARA OIG determined that the *AmeriCorps* OIG OI's system of internal safeguards and

management procedures for the investigative function follows the quality standards established by CIGIE, by other applicable guidelines, and by relevant statutes. Those safeguards and procedures provide reasonable assurance the *AmeriCorps* OIG OI is conforming with professional standards in the planning, execution and reporting of its investigations.

Response to Congressional Items

The OIG continues to keep Congress informed about agency and OIG activities. The OIG actively worked with the CIGIE Legislation Committee to provide comments on various pieces of potential legislation and help communicate the views of CIGIE and the NARA OIG to relevant congressional committees, including drafting a proposed legislative priority for CIGIE. The OIG also worked on requests from various Congressional staffers.

Top Management Challenges

The following summarizes NARA's most significant management and performance challenges based on legislative mandates, our experience, stakeholder input, and our observations.

1. Information Technology (IT) Security

In FY 2024, NARA downgraded controls over IT security to a significant deficiency. Over the past decade annual Federal Information Security Modernization Act (FISMA) audits or assessments have consistently identified IT areas in need of significant improvement.

2. Electronic Records Archives (ERA)

ERA has become a "system of systems," and the original ERA Base System was not capable of meeting the nation's needs. Thus, NARA is developing ERA 2.0, with an estimated lifecycle cost of $94 million. However, until ERA 2.0's functionality is completely built, longstanding deficiencies may continue to impact NARA. Further, the vast volumes of electronic records that will need to be preserved is significant, and NARA is challenged to meet data storage requirements for them. NARA's on-premise data storage is reaching capacity, impacting the agency's digitization efforts and other IT programs.

3. Transition to Electronic Records

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

4. Expanding Public Access to Records

Ten percent of NARA's analog holdings (by series) have not been processed, so the public does not have efficient and effective access to them. To meet its mission, NARA must work to ensure it has the processes and resources necessary to establish intellectual control over this backlog of unprocessed records. In addition, the transition of federal record-keeping to a fully electronic environment will present additional challenges to making records accessible to the public.

5. Human Capital Management

NARA began identifying Human Capital practices as a material weakness in FY 2018 as the result of OIG Audit No.18-AUD-09, which found numerous internal control issues within NARA's Office of Human Capital. In FY 2023, NARA removed Human Capital practices as a material weakness, instead labeling it a reportable condition. In FY 2024, NARA removed Human Capital practices as a reportable condition. NARA continues to collaborate with its shared service provider to ensure human resource data is correct for all current and former employees.

Background Information

About the National Archives and Records Administration

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

NARA holds more than 5 million cubic feet of traditional records, maintains over 700,000 artifacts, and approximately 1,308 terabytes of electronic records. In FY 2024, NARA reported 74,471,928 online visits, and they responded to 1,770,822 written requests from the public. The impact of the COVID-19 pandemic has decreased, and in FY 2024 NARA reported over 2.8 million physical visits. With approximately 2,892 employees, NARA operates 41 facilities nationwide.

In FY 2024, NARA was appropriated $427.3 million for operating expenses, including $2 million to make publicly available records related to missing Armed Forces and civilian personnel, and $30 million of which shall remain available until expended for expenses necessary to enhance the federal government's ability to electronically preserve, manage, and store Government records; $25.5 million for Repairs and Restoration, including $17.5 million for improvements to the Dwight D. Eisenhower Presidential Library in Abilene, Kansas; $48.4 million for National Historical Publications Records Commission grants; and $5.9 million for OIG operations.

About the Office of Inspector General (OIG)

The OIG serves the American citizen by improving the effectiveness, efficiency, and economy of NARA programs and operations while keeping our stakeholders informed. As part of our mission, we detect and prevent fraud and abuse in NARA programs and strive to ensure proper stewardship over federal funds. We accomplish this by providing high-quality, objective audits, investigations, and other products and serving as an independent internal advocate. Unique to our mission among other OIGs is our duty to ensure NARA protects and preserves the items belonging in our holdings while safely providing the American people with the opportunity to discover, use, and learn from our documentary heritage. Our vision is to impartially deliver independent, thorough oversight that transforms the agency into a more efficient and effective organization.

In FY 2024, Congress provided $5.920 million for the OIG's appropriation. At the close of the period, the OIG had 13 employees on board.

Reporting Requirements

5 U.S.C. § or Law	Subject	Page(s)
§ 404(a)(2)	Review of legislation and regulations.	11–12
§ 405(a)(1)	Significant problems, abuses, and deficiencies relating to the administration of agency programs and operations and associated reports and recommendations.	2–5, 7–10, 13, 20–22
§ 405(a)(2)	Recommendations made before the reporting period, for which corrective action has not been completed.	20–22
§ 405(a)(3)	Summary of significant investigations closed during the reporting period.	7–8
§ 405(a)(4)	Total number of convictions during the reporting period resulting from investigations.	none
§ 405(a)(5)(A)	Listing of each audit, inspection, or evaluation.	20
§ 405(a)(5)(B)	The total dollar value of questioned costs (including a separate category for the dollar value of unsupported costs) and the dollar value of recommendations that funds be put to better use, including whether a management decision had been made by the end of the reporting period.	19
§ 405(a)(6)	Any management decision made during the reporting period with respect to any audit, inspection, or evaluation issued during a previous reporting period.	18, 20–22
§ 405(a)(7)	The information described under section 804(b) of the Federal Financial Management Improvement Act of 1996 (P.L. 104-208).	None
§ 405(a)(8)	The results of any peer review conducted by another OIG during the reporting period; or if no peer review was conducted, a statement identifying the date of the last peer review conducted by another OIG.	11–12
§ 405(a)(9)	Any outstanding recommendations from any peer review conducted by another OIG that may have not been fully implemented, including describing the status of the implementation and why it is not complete.	11–12 (none)
§ 405(a)(10)	Any peer reviews of another OIG during the reporting period, including a list of any outstanding recommendations made from any previous peer review (including any peer review conducted before the reporting period) that remain outstanding or have not been fully implemented.	11–12

Reporting Requirements

§ 405(a)(11)	Statistical table showing the total number of investigative reports issued during the reporting period; the total number of persons referred to the Department of Justice for criminal prosecution during the reporting period; the total number of persons referred to State and local prosecuting authorities for criminal prosecution during the reporting period; and the total number of indictments and criminal informations during the reporting period that resulted from any prior referral to prosecuting authorities.	17
§ 405(a)(12)	A description of the metrics used for developing the data for the statistical table under § 405(a)(11).	17
§ 405(a)(13)	Report on each investigation conducted by the Office where allegations of misconduct were substantiated involving a senior Government employee.	7,8,18 (none)
§ 405(a)(14)	Description of any instance of whistleblower retaliation, including information about the official found to have engaged in retaliation; and, if any, consequences the establishment imposed to hold the official accountable.	7, 18 (none)
§ 405(a)(15)(A)	Information related to interference by the establishment, including any attempt by the establishment to interfere with the independence of the OIG, including with budget constraints designed to limit the capabilities of the OIG; and incidents where the establishment has resisted or objected to oversight activities or restricted or significantly delayed access to information, including the justification of the establishment for such action.	18 (none)
§ 405(a)(15)(B)	A summary of each report made to the head of the establishment under section § 406(c)(2) when information or assistance was unreasonably refused .	none
§ 405(a)(16)(A)	Each inspection, evaluation, and audit conducted by the OIG that is closed and was not disclosed to the public.	17 (none)
P.L. 110-181	Annex on completed contract audit reports	16 (none)
P.L. 104-106	Open audit recommendations	20–22
EO 14074	Use of force incidents involving NARA OIG personnel	17 (none)
EO 14074	No-knock entries conducted by NARA OIG personnel	17 (none)
P.L. 117-348	Number of Suspected Violations Reported	17 (none)
P.L. 117-348	Number of Investigations	17 (none)
P.L. 117-348	Status and Outcomes of Such Investigations	17 (N/A)
P.L. 117-348	Improvement Recommendations	17 (none)

ANNEX ON COMPLETED CONTRACT AUDIT REPORTS

Section 845 of the 2008 Defense Authorization Act, Public Law 110-181, requires certain information on completed contract audit reports containing significant audit findings be included as an annex to this report. While the OIG conducts audit work involving contracts, these are generally program audits as opposed to contract audits.

Reporting Requirements

SUMMARY OF INVESTIGATIONS AND PROSECUTORIAL REFERRALS
Requirement § 405(a)(4), (11)

Investigative Workload	
Hotline and complaints received this reporting period	278
Hotlines and complaints referred to other parties during this reporting period	61
Investigative matters opened this reporting period	15
Investigative matters closed this reporting period	9
Closing investigative reports written this reporting period	2
Investigative Results	
Total individuals referred to DOJ for prosecution	2
Individuals referred to DOJ – accepted for prosecution	0
Individuals referred to DOJ – declined for prosecution	2
Individuals referred DOJ – pending prosecution decision	0
Total individuals referred to state and local authorities for prosecution	0
Individuals referred to state and local authorities – accepted for prosecution	0
Individuals referred to state and local authorities – declined for prosecution	0
Individuals referred state and local authorities – pending prosecution decision	0
Arrest	0
Indictments and information	0
Convictions	2
Fines, restitutions, judgments, and other civil and administrative recoveries	$0
Administrative Remedies	
Employee(s) terminated	2
Employee(s) resigned	1
Employee(s) suspended	0
Employee(s) given letter of reprimand or warnings/counseled	0
Employee(s) taking a reduction in grade in lieu of administrative action	0
Contractor (s) removed	0
Individual(s) barred from NARA facilities	3
EO on Advancing Effective, Accountable Policing & Criminal Justice Practices to Enhance Public Safety	
Use of force incidents involving NARA OIG personnel	0
No-knock entries conducted by NARA OIG personnel	0
Trafficking Victims Prevention and Protection Reauthorization Act	
Number of Suspected Violations Reported	0
Number of Investigations	0
Status and Outcomes of Such Investigations	N/A
Improvement Recommendations	N/A

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

Reporting Requirements

Report No.	Title	Date	Questioned Costs	Unsupported Costs	Funds Put to Better Use
24-AUD-04	Audit of NARA's Compliance with the Payment Integrity Information Act of 2019 in FY 2023	May 29, 2024	$0	$0	$0
24-AUD-05	Audit of NARA's Information Security Oversight Office	June 27, 2024	$0	$0	$0
24-AUD-06	Audit of NARA's Records Preservation Efforts	August 15, 2024	$0	$0	$0
24-AUD-07	Audit of NARA's FY 2024 Federal Information Security Modernization Act Audit	September 27, 2024	$0	$0	$0
24-AUD-08	Audit of NARA's Office of the Chief Records Officer Records Management Oversight and Reporting	September 30, 2024	$0	$0	$0
24-AUD-09	Audit of NARA's Cloud Computing Services	September 30, 2024	$0	$0	$0
24-R-10	Evaluation of NARA's Controls over Relocation of Records	September 30, 2024	$0	$0	$0

OTHER REQUIRED INFORMATION

REQUIREMENT	CATEGORY	SUMMARY
§ 405(a)(6)	Any management decision made during the reporting period with respect to any audit, inspection, or evaluation issued during a previous reporting period.	We meet and engage with NARA staff at all levels to coordinate addressing NARA's 221 open recommendations. During this period, 50 of them were closed.
§ 405(a)(14)	Any instance of whistleblower retaliation, including information about the official found to have engaged in retaliation; and, if any, consequences the establishment imposed to hold the official accountable.	None.
§ 405(a)(15)(A)	Interference by the agency, including any attempt by the agency to interfere with the independence of the OIG, including with budget constraints designed to limit the capabilities of the OIG; and incidents where the agency has resisted or objected to oversight activities or restricted or significantly delayed access to information, including the justification of the agency.	None.
§ 405(a)(16)(A)	Closed inspections, evaluations, and audits not disclosed to the public	All closed audits and evaluations were disclosed to the public; no inspection products were produced.

Reporting Requirements

AUDIT, INSPECTION, AND EVALUATION REPORTS WITH QUESTIONED COSTS
Requirement § 405(a)(5)(B)

Category	Number of Reports	DOLLAR VALUE	
		Questioned Costs	Unsupported Costs
A. For which no management decision has been made by the commencement of the reporting period	1	$131,816	$0
B. Which were issued during the reporting period	0	$0	$0
Subtotals (A + B)	1	$131,816	$0
C. For which a management decision has been made during the reporting period	0	$0	$0
(i) dollar value of disallowed cost	0	$0	$0
(ii) dollar value of costs not disallowed	0	$0	$0
D. For which no management decision has been made by the end of the reporting period	1	$131,816	$0
E. For which no management decision was made within 6 months	1	$131,816	$0

AUDIT, INSPECTION, AND EVALUATION REPORTS WITH RECOMMENDATIONS
THAT FUNDS BE PUT TO BETTER USE
Requirement § 405(a)(5)(B)

Category	Number	Dollar Value
A. For which no management decision has been made by the commencement of the reporting period	1	$2,663,966
B. Which were issued during the reporting period	0	$0
Subtotals (A + B)	1	$2,663,966
C. For which a management decision has been made during the reporting period	0	$0
(i) dollar value of recommendations that were agreed to by management	0	$0
Based on proposed management action	0	$0
Based on proposed legislative action	0	$0
(ii) dollar value of recommendations that were not agreed to by management	0	$0
D. For which no management decision has been made by the end of the reporting period	1	$2,663,966
E. For which no management decision was made within 6 months of issuance	1	$2,663,966

Reporting Requirements

SUMMARY OF OPEN AUDIT RECOMMENDATIONS

An important responsibility of the OIG is to follow up on previously issued reports with outstanding recommendations. Although NARA has made significant progress in the past, closing the remaining open audit recommendations remains important to improving NARA's programs and operations. As of this semi-annual reporting period NARA has 221 outstanding open recommendations, with the oldest issued over 14 years ago. Per *OMB Circular No. A-50, Revised*, audit follow-up is an integral part of good management, and is a shared responsibility of agency management officials and auditors. The OIG continues to meet and engage NARA staff at all levels to coordinate addressing open recommendations. Further, NARA may also be leaving itself vulnerable to IT security and other risks by not implementing agreed upon actions to close open recommendations. We encourage NARA to place additional emphasis on addressing open recommendations.

During this period, 50 recommendations were closed. At the close of the period, there were 221 total open recommendations. The full text of each open recommendation, as well as links to the report they came from, can be found on www.oversight.gov at our open recommendations link toward the bottom of the page on the left side.

Report Number	Date Issued	Title	Number of Open Recommendations
11-02	11/8/2010	Network Vulnerability and Penetration Testing	1
12-09	5/10/2012	Data Center Consolidation Initiative	1
12-11	8/27/2012	Network Discovery and Assessment	2
12-15	7/23/2012	Classified Systems	3
13-01	12/10/2012	Internal Controls Program	1
13-08	7/9/2013	Preservation Program (Textual)	1
13-10	7/9/2013	Archival Facilities	4
13-14	9/18/2013	Processing of Textual Records	2
14-01	1/30/2014	Management and Oversight of NARA's Energy Savings Performance Contracts (ESPCs)	1
14-08	4/17/2014	Capital Planning and Investment Control (CPIC) Process	5
14-10	5/9/2014	Enterprise Wireless Access	1
15-03	2/6/2015	Specially Protected Holdings	9
15-11	5/5/2015	Digitization Storage and Transfer Capabilities	1

Reporting Requirements

Report Number	Date Issued	Title	Number of Open Recommendations
15-15	9/30/2015	Assessment of Cable Infrastructure	3
16-01	10/19/2015	Web Hosting Environment	6
16-05	3/25/2016	Publicly Accessible Websites	1
16-07	5/17/2016	Refile Processes at Selected Federal Records Centers	2
17-AUD-01	10/28/2016	Enterprise-Wide Risk Assessment of NARA's Internal Controls	7
17-AUD-03	11/4/2016	Compliance With the Federal Managers Financial Integrity Act for FY 2015	8
17-AUD-04	11/18/2016	Management Control Over Microsoft Access Applications and Databases	3
17-AUD-06	11/15/2016	Procurement Program	10
17-AUD-07	2/19/2017	Compliance with Homeland Security Presidential Directive 12	3
17-AUD-08	3/15/2017	Adoption and Management of Cloud Computing	3
18-AUD-09	6/4/2018	Human Capital Practices	1
19-AUD-03	12/20/2018	Presidential Libraries' Analog Processing	1
19-AUD-07	3/29/2019	Purchase Card Program *Questioned Costs - $131,816*	9
20-AUD-03	12/12/2019	Classified Information Systems	9
20-AUD-06	3/4/2020	Oversight and Management of Information Technology Contracts	2
20-AUD-12	6/18/2020	Personnel Security and Suitability Program	2
20-AUD-15	8/27/2020	Cybersecurity Risk Management Process	2
21-AUD-03	11/10/2020	FY 2020 Financial Statements	1
21-AUD-08	6/14/2021	Controls Over the Use of Information Technology Equipment and Resources	6
21-AUD-10	8/26/2021	Controls over Loans of NARA Holdings	4
21-AUD-11	8/26/2021	NARA's High Value Assets	4

Reporting Requirements

Report Number	Date Issued	Title	Number of Open Recommendations
21-AUD-12	9/7/2021	NARA's Records Disposal Processes	8
21-AUD-13	9/29/2021	NARA's Travel Card Program	2
22-AUD-01	11/2/2021	Compliance under the DATA Act of 2014	1
22-AUD-05	3/30/2022	Corporate Records Management Program	1
22-AUD-06	04/25/2022	Audit of NARA's Holdings Protection Program	1
22-AUD-07	04/29/2022	Audit of NARA's Processing of Discrimination Complaints	6
23-AUD-03	5/4/2023	Audit of NARA's Software Asset Management Process *Funds to be Put to Better Use - $2,663,966*	2
23-R-05	5/5/2023	Evaluation of Records Request Backlog at NPRC	4
23-AUD-06	9/1/2023	Audit of NARA's Electronic Records Archives (ERA) 2.0 System	2
24-AUD-01	10/24/2023	Audit of NARA's FY 2023 Federal Information Security Modernization Act Audit	12
24-AUD-02	11/15/2023	Audit of NARA's FY 2023 Financial Statements *and* Management Letter: Control Deficiencies Identified During the Audit of NARA's Financial Statements for FY 2023	11
24-AUD-03	3/14/2024	Audit of NARA's Off-boarding Process	7
24-AUD-05	06/27/2024	Audit of NARA's Information Security Oversight Office	6
24-AUD-06	08/15/2024	Audit of NARA's Records Preservation Efforts	8
24-AUD-07	09/27/2024	NARA's FY 2024 Federal Information Security Modernization Act of 2014 Audit	16
24-AUD-08	09/30/2024	Audit of NARA's Office of the Chief Records Officer Records Management Oversight and Reporting	5
24-AUD-09	09/30/2024	Audit of NARA's Cloud Computing Services	4
24-R-10	09/30/2024	Evaluation of NARA's Controls over Relocation of Records	6

Reporting Requirements

Photo: National Archives Building in Washington, DC. NARA Identifier 184341098.

Contact the OIG

OIG Hotline

The OIG Hotline provides a confidential channel for reporting fraud, waste, abuse, and mismanagement to the OIG. In addition to receiving telephone calls at a toll-free Hotline number, we also accept contacts through an online referral form. Walk-ins are always welcome at suite 2800 in the National Archive's College Park facility. Visit *www.archives.gov/oig/* or *https://naraoig.oversight.gov/* for more information, or contact us:

- **By telephone**
  Washington, DC, Metro area: 301-837-3500
  Toll-free: 800-786-2551
- **By facsimile**
  301-837-3197
- **By online referral form**
  https://naraoig.oversight.gov/online-complaint-form

Contractor Self-Reporting

Effective December 12, 2008, the Federal Acquisition Regulation (FAR) was amended to, in part, require that contractors timely notify the relevant OIG whenever there is credible evidence to believe that a violation(s) of criminal law and/or the civil False Claims Act have occurred in connection with a Federal contract.

Specifically, contractors must disclose, in writing, to the OIG whenever the they have credible evidence that a principal, employee, agent, or subcontractor of the contractor has committed a violation of the civil False Claims Act (31 U.S.C. 3729-3733) or Federal criminal law involving fraud, conflict of interest, bribery or gratuity violations (found in Title 18 of the United States Code) in connection with the award, performance, or closeout of a Government contract or any related subcontract. Disclosures must be made by a senior officer or manager authorized to speak for the contractor.

Penalties for knowing failure to timely disclose include potential suspension and/or debarment. For additional details see: Contractor Business Ethics Compliance Program and Disclosure Requirements, 73 Fed. Reg. 219, 67064 (Nov. 12, 2008) (48 C.F.R 52.203-13(c)(2)(ii)(F)).

Disclosures and/or supporting documentation can be submitted via the online referral form at *https://naraoig.oversight.gov/oig-contractor-reporting-form*.

Disclosures and/or supporting documentation can also be mailed to:

NARA Office of Inspector General
Attn: Contractor Disclosure
8601 Adelphi Road, Suite 2800
College Park, MD 20740