



OFFICE *of* INSPECTOR GENERAL

Audit of NARA's Freight and Shipping Procurement Process

(26-AUD-08)

September 28, 2026





Inspector General

September 28, 2026

TO: Valorie Findlater
Chief of Management and Administration and Acting Executive for Business Support Services

FROM: William Brown 
Acting Inspector General

SUBJECT: *Audit of NARA's Freight and Shipping Procurement Process – **OIG***
Audit Report No. 26-AUD-08

Attached is the Office of Inspector General's final audit report for our Audit of NARA's Freight and Shipping Procurement Process. The report contains 13 recommendations which will assist the agency in enhancing controls in the freight and shipping procurement process. Consistent with our responsibility under the *Inspector General Act, as amended*, the OIG will determine the extent of information to be posted publicly on our website and may provide copies of this report to congressional oversight committees. I appreciate the cooperation and assistance NARA provided this office during the audit. Please contact me with any questions.

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Executive Summary

Audit of NARA's Freight and Shipping Procurement Process

OIG Report No. 26-AUD-08

September 28, 2026

Why Did We Conduct This Audit?

The National Archives and Records Administration (NARA) spends millions annually transporting federal records.

The Office of Inspector General (OIG) conducted this audit to determine the effectiveness of NARA's freight and shipping procurement process over Fiscal Year's (FY) 2022-2024.

What Did We Recommend?

We made 13 recommendations which, when implemented by management, will assist the agency in enhancing controls in the freight and shipping procurement process.

What Did We Find?

NARA's freight and shipping procurement processes need improvement. Specifically, we identified weaknesses in governance, acquisition practices, documentation, oversight, and internal controls that increase the risk of noncompliance with federal regulations, diminished accountability, and potential threats to security and integrity of NARA holdings. Most notably, we found approximately \$5.5 million in unsupported costs related to invoice documentation over FY's 2022-2024.

Overall, these conditions existed because NARA did not have adequate oversight to ensure their freight and shipping procurement processes operated within federal laws and regulations while influenced by a culture anchored in legacy methodologies.

Without effective internal controls over NARA's freight and shipping procurement process, there is an increased risk of biased transportation service provider selection, monetary loss, unauthorized access to NARA holdings, and the inability to track overall procurements at a high level.

Summary of Recommendations:

Number	Recommendation	Responsible Office
1	Strengthen existing invoice retention policies to ensure full auditability of freight and shipping procurement records.	Business Support Services
2	Ensure all NA Form 6062s are fully completed, including the required signatures.	Business Support Services
3	Reinforce current policies regarding management approval documentation for all freight and shipping procurements before execution.	Business Support Services
4	Develop and implement a centralized process to track and reconcile all freight and shipping procurements per procurement (e.g. per disposal, relocation).	Business Support Services
5	Reinforce Transportation Service Provider (TSP) driver vetting and documentation processes to ensure only authorized and cleared individuals can transport sensitive holdings.	Business Support Services
6	Establish a requirement to include the reason for each procurement in the BOL dataset, and either remove incomplete BOL entries or provide mandatory notes justifying their inclusion to ensure dataset integrity.	Business Support Services
7	Establish and implement a Multiple-Award Blanket Purchase Agreement (BPA) under the GSA Multiple Award Schedule (MAS) when selecting Transportation Services Providers (TSP) for relocations, to avoid anti-competitive selection, and allow for agility in addressing complex requirements in accordance with FAR 8.405-3.	Business Support Services
8	Develop and implement procedures for Transportation Service Provider (TSP) vetting and selection by utilizing a selection plan that defines the specific rationale for each TSP selection from the GSA Transportation Management Services Solution (TMSS) system, that is not covered under the BPA.	Business Support Services
9	Identify staff and management involved in the Transportation Service Provider (TSP) selection process and require them to obtain Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR) Level I certification.	Business Support Services
10	Perform a comprehensive review of NARA Directive 702 and NARA Directive 1702, and applicable supplements related to NARA's freight and shipping procurement process, to ensure alignment with current federal regulations, operational needs, potential gaps in internal	Chief of Management and Administration

	controls, and establish a regular review cycle to prevent future obsolescence.	
11	Develop and implement formal, documented training for all staff involved in NARA's freight and shipping procurement process, ensuring oversight and compliance with NARA directives, federal regulations, and operational needs.	Business Support Services
12	Establish a dedicated line of communication with Business Support Services regarding submission of Transportation Services Orders (TSO) documentation. This channel must facilitate end-to-end supervision of all documentation, handling, and other direct controls pertinent to NARA holdings.	Business Support Services
13	Establish and implement a transportation pre-payment audit program, approved by the CFO, and includes an appeals process that ensures compliance with the regulatory frameworks of 41 CFR 102-118.	Business Support Services and Chief Financial Officer

Background

NARA Directive 702, Procuring Freight and Shipping Services, effective October 2010, governs the procurement of freight and shipping services across the agency. The Facilities and Personal Property Management Division (BF) is responsible for managing and overseeing these procurements.

When a NARA unit requires transportation services, BF selects a qualified Transportation Service Provider (TSP) using the General Services Administration's (GSA) Transportation Management Services Solution (TMSS). Depending on the nature and value of the requirement, shipments may be procured either through Transportation Service Orders (TSOs), which are generally used for when an off-schedule TSP is required or when the TMSS process is insufficient. Following shipment completion, NARA uses a third-party bank platform to conduct invoice processing activities, including payment administration and invoice auditing.

Between 2022 and 2024, the GSA made approximately 200 Transportation Service Providers (TSPs) available for federal freight and shipping procurement. Throughout this scope period, NARA consistently selected the same eight providers from the GSA TMSS system, namely:

- 8 out of 202 for Fiscal Year (FY) 2022;
- 8 out of 200 for FY 2023; and
- 8 out of 200 for FY 2024.

During FY 2022 through 2024, NARA spent more than \$12 million for freight and shipping services.

NARA Directive 1702, Transporting Holdings in NARA's Physical and Legal Custody, effective September 1999, establishes guidance for transporting holdings that are in NARA's physical and legal custody to ensure their protection, physical safety, and return to NARA. It mandates strict accountability protocols, requiring custodial units to use standardized documentation, such as NA Form 14014, to maintain a clear chain of custody. Supplement 1 to NARA Directive 1702, effective August 2022, guides the selection of transport methods based on the sensitivity of holdings. It introduces tiered categories for Special Protected Holdings, identifying Tier 1 items as those of the highest historical or national significance, and mandates enhanced security protocols including 24-hour GPS tracking.

Federal regulations, specifically Title 41 Code of Federal Regulations (CFR) Part 102.118, Transportation Payment and Audit, require agencies to verify the accuracy of transportation invoices prior to payment and maintain a Chief Financial Officer (CFO)-approved prepayment audit program. Mandatory components of the program include verifying bills against filed rates, preventing duplicate payments via unique numbering, and establishing a formal appeals process.

for service providers. Additionally, 41 CFR Part 102-118.295 standardizes the debt collection and dispute resolution process. It defines the timelines and methods for notifying TSPs of adjustments, ensuring a clear, legal pathway for TSPs to contest or settle billing claims.

As part of managing freight and shipping activities, NARA is also required to maintain records in accordance with applicable records management requirements, including the General Records Schedules (GRS).

Audit Results

Finding 1. NARA's Facility and Property Management Division Provided Insufficient Procurement Documentation.

During the audit of freight and shipping procurements, we identified multiple control and documentation deficiencies within the BF group. Specifically, BF did not provide invoices for 27 procurements, totaling \$5,510,460.88.¹ Testing also revealed that some NA Form 6062s were insufficiently completed and lacked the required authorization signatures. Furthermore, the BF group was unable to provide sufficient supporting evidence of managerial review, such as TMSS workflow approvals or email correspondence. Additionally, BF did not provide the OIG with clearance documentation for two drivers/escorts that required a security clearance.

Further, we observed that BF does not track individual freight and shipping procurements at a high level; rather, they are recorded merely as individual Bill of Lading (BOL) line items. As a result, NARA was unable to identify the reason for 38 procurements out of a sample of 97. Additionally, BF did not fully populate five split purchase BOL line items and omitted any associated explanatory notation, an omission that was inconsistent with other split purchase records.

NARA Directive 702 mandates that BF arranges for and oversees freight shipments for all NARA units. This establishes a clear chain of command requiring managerial review to verify that prices and services rendered match the negotiated contract of carriage before funds are obligated or payments are certified. Furthermore, the directive enforces documentation standards to ensure a complete audit trail for every procurement. BF must issue a control number for each shipping request, track each shipment from start to finish, and utilize specific forms including NA Form 6062, Freight Shipping Requisition, alongside bills of lading (BOL) to document the receipt and title of goods.

BF is also responsible for tracking freight and shipping invoices in accordance with established fiscal accountability standards. Per NARA GRS 1.1, invoice records must be retained for a period of six years. Furthermore, to support these internal controls and ensure a complete audit trail, the Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* dictates that all such documentation must be maintained so that it is readily available for examination. To fulfill the mandate of NARA Directive 1702, which establishes that the protection and physical safety of holdings must be the primary consideration during

¹ OIG attempts to obtain the original source documentation directly from the Transportation Service Provider (TSP) and the third-party bank platform were unsuccessful.

transport, Supplement 1 requires the use of vetted, approved drivers when moving Specially Protected Holdings; furthermore, if these shipments involve access to classified national security information, NARA Directive 273 dictates that the contractors or personnel involved must hold the appropriate security clearances.

These conditions occurred due to a lack of management oversight and an established culture of doing things the way they have historically been done. Consequently, the agency faces several operational, financial, and security risks. Specifically:

- The absence of source documents creates an insufficient audit trail and the missing invoices creates a risk that unauthorized or incorrectly priced billings remain undetected.
- Incomplete NA Form 6062s make it difficult to verify that freight procurements were properly approved and compliant with NARA regulations.
- Without documented management review, there is insufficient assurance that procurements align with budget constraints or strategic goals.
- Relying solely on disparate BOLs prevents NARA from viewing the actual total cost, count, and reason for each freight procurement in an organized fashion increases the difficulty of reconciling shipments against orders and analyzing the aggregate spending on freight and shipping procurements.
- The absence of source documents to verify clearance status creates a vulnerability where unvetted individuals may have access to sensitive NARA holdings.
- Including blank records in BOL data sets without explanatory notation compromises dataset integrity.



Photo Credit NAID: 539860

Recommendations

We recommend the Executive for Business Support Services should:

- Recommendation 1:** Strengthen existing invoice retention policies to ensure full auditability of freight and shipping procurement records.
- Recommendation 2:** Ensure all NA Form 6062s are fully completed, including the required signatures.
- Recommendation 3:** Reinforce current policies regarding management approval documentation for all freight and shipping procurements before execution.
- Recommendation 4:** Develop and implement a centralized process to track and reconcile all freight and shipping procurements per procurement (e.g. per disposal, relocation).
- Recommendation 5:** Reinforce Transportation Service Provider (TSP) driver vetting and documentation processes to ensure only authorized and cleared individuals can transport sensitive holdings.
- Recommendation 6:** Establish a requirement to include the reason for each procurement in the Bill of Lading (BOL) dataset, and either remove incomplete BOL entries or provide mandatory notes justifying their inclusion to ensure dataset integrity.

Finding 2. NARA's Transportation Service Provider (TSP) Selection Process Needs to Be Revised.

We found the current TSP selection process lacks justification documentation for selection. Specifically, BF did not provide documentation of unique, shipment-specific determinations for 97 of 97 tested freight procurements, which did not allow the OIG to independently verify how BF's determination of best value occurred. Further, BF's process of obtaining quotes from only three TSPs from a pool of ten, appears arbitrary.

Under NARA 702, BF arranges for and oversees freight shipments for all NARA units. 41 CFR Part 102 defines regulations for agencies to determine shipping mode and requires agencies to ensure that TSPs deliver consistent, satisfactory service that meets their transportation needs. GAO's *Standards for Internal Control in the Federal Government* states that management clearly document the performance of control activities and that all transactions and other significant events that occur in a manner that allows the documentation to be readily available for examination. The standards further state that documentation and records are to be properly managed and maintained.

This condition occurred because NARA did not implement sufficient internal controls over freight and shipping procurement TSP selection(s) and staff relied on inadequate historical practices. Without unique evidence of the analysis performed, the agency cannot substantiate that it obtained the best value for \$12 million in freight and shipping expenditures. The lack of documentary evidence increases the perception of biased TSP selection practices.



Photo Credit NAID: 234118479

Recommendations

We recommend the Executive for Business Support Services:

Recommendation 7: Establish and implement a Multiple-Award Blanket Purchase Agreement (BPA) under the GSA Multiple Award Schedule (MAS) when selecting Transportation Services Providers (TSP) for relocations, to avoid anti-competitive selection, and allow for agility in addressing complex requirements in accordance with FAR 8.405-3.

Recommendation 8: Develop and implement procedures for Transportation Service Provider (TSP) vetting and selection by utilizing a selection plan that defines the specific rationale for each TSP selection from the GSA Transportation Management Services Solution (TMSS) system, that is not covered under the BPA.

Recommendation 9: Identify staff and management involved in the Transportation Service Provider (TSP) selection process and require them to obtain Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR) Level I certification.

Finding 3. NARA Needs to Revise its Policies and Procedures Related to its Freight and Shipping Procurement Process and Subsequently Develop and Implement Training.

We found NARA's current policies and procedures are outdated and contain specific control gaps, while formal training on the freight and shipping procurement process remains largely undocumented and insufficient. NARA Directive 702 requires a comprehensive revision to accurately reflect modern NARA needs, updated office names, and current regulatory standards. Currently, NARA Directive 702 lists an audit contractor who is no longer used, and weight standards are only clearly defined for mail and package delivery services. Similarly, NARA Directive 1702 contains outdated office codes and relies on definitions that are likely outdated. Furthermore, NARA Directive 1702, Supplement 1, contains a potential gap in internal controls, namely NARA allows TSPs to perform a background check on approved drivers versus mandating that NARA perform a federal background check.

GAO's *Standards for Internal Control in the Federal Government* requires management to periodically review policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks. If a significant change occurs in processes, personnel, or external regulations, management must review these processes in a timely manner to ensure control activities remain appropriately designed and implemented. Additionally, GAO *Standards for Internal Control in the Federal Government* requires management to demonstrate a commitment to competence by establishing expectations for key roles. This competence requires relevant knowledge, skills, and abilities gained through professional experience, training, and certifications. NARA Directive 111 outlines the requirements for maintaining and updating internal directives. Section 111.22 specifies that the Chief of Management and Administration must review policy directives at least every two years from the date signed and coordinate necessary updates with the responsible office. For interim guidance, the responsible office is notified to incorporate the policy into a directive, while offices or units outside the Washington, D.C., area are responsible for reviewing and updating supplements as necessary.

These conditions occurred because BF and the applicable NARA units did not prioritize updating NARA directives. Additionally, the BF group lacks documented training due to a lack of administrative oversight. Outdated NARA Directives create a risk that staff may rely on obsolete guidance, leading to operational inconsistencies, non-compliance with current federal standards, and an inability to adapt to evolving mission requirements. Furthermore, without sufficient documented training and formal administrative oversight, BF risks the loss of institutional knowledge and the perpetuation of inefficient or non-compliant freight and shipping procurement practices that do not align with modern procurement regulations.

Recommendations

We recommend the Chief of Management and Administration should work with applicable NARA Units to:

Recommendation 10: Perform a comprehensive review of NARA Directive 702 and NARA Directive 1702, and applicable supplements related to NARA's freight and shipping procurement process, to ensure alignment with current federal regulations, operational needs, potential gaps in internal controls, and establish a regular review cycle to prevent future obsolescence.

Recommendation 11: Develop and implement formal, documented training for all staff involved in NARA's freight and shipping procurement process, ensuring oversight and compliance with NARA directives, federal regulations, and operational needs.

Finding 4. Nonexistent Communication of Transportation Service Orders (TSO) between NARA Units and NARA’s Facility and Property Management Division.

We found communication between BF and other NARA units does not exist regarding freight and shipping procurements outside of the TMSS system. During our testing, we determined that 93 of 122² freight and transportation purchases, \$84,237 of \$122,679, occurred without BF group oversight. There were 29 out of the 122 transactions paid out of the General Fund, and not subject to NARA Directive 702.3a.³

NARA Directive 702.6.b(7) directs NARA units, when holdings are shipped using a TSO, to seek quotes directly from vendors and work with them regarding all shipping arrangements, requirements and services and to submit all required TSO documents to BF.

This condition occurred because NARA units were not aware of their obligation to submit TSO documentation to BF and BF was unaware that TSOs were being made. Without required communication from other NARA units, BF’s ability to oversee and track all freight and shipping procurement purchases across NARA is limited.

Recommendation

We recommend the Executive for Business Support Services should work with Executives for applicable NARA units to:

Recommendation 12: Establish a dedicated line of communication with Business Support Services regarding submission of Transportation Services Orders (TSO) documentation. This channel must facilitate end-to-end supervision of all documentation, handling, and other direct controls pertinent to NARA holdings.

² From GFY 2022-2024, NARA made 122 purchases that fell under the designation of a TSO with Merchant Category Code (MCC) descriptions of "Freight Carrier, Trucking-LCL/LNG Dist, MVG/Storage", and "Transportation Services – Not Elsewhere Classified."

³ NARA 702 applies to all freight and holding shipments paid for using Trust, Gift, Revolving, and Operating funds.

Finding 5. NARA's Facility and Property Management Division is in Noncompliance with 41 CFR 102-118.

BF could not provide a prepayment audit program signed by the CFO, as required. This condition was caused by a lack of management awareness regarding the internal control requirements set forth in 41 CFR Part 102-118. Under 41 CFR Part 102-118.270, federal agencies must establish a prepayment audit program. According to 41 CFR Part 102-118.285, this program must be approved by the CFO and submitted to GSA to satisfy the Travel and Transportation Reform Act of 1998. Consequently, without a formally approved prepayment audit plan, NARA does not have sufficient assurance that it actively complies with federal regulations governing freight and shipping procurements.

Recommendation

We recommend the Executive for Business Support Services should work with the Chief Financial Officer to:

Recommendation 13: Establish and implement a transportation pre-payment audit program, approved by the CFO, and includes an appeals process that ensures compliance with the regulatory frameworks of 41 CFR 102-118.

Appendix A – Objective, Scope, and Methodology

Objective

The objective of this audit was to determine the effectiveness of NARA’s freight and shipping procurement process.

Scope and Methodology

To accomplish our objective, we performed audit procedures at Archives II in College Park, Maryland from September 2025 to May 2026. The scope of the audit included all freight and shipping procurements made and initiated between October 1, 2021, and September 30, 2024 (FY 2022 through FY 2024).

We performed the following:

- Reviewed relevant guidance:
 - NARA Directive 111, *NARA Directives*, (Effective: April 20, 2005)
 - NARA Directive 1702, *Transporting Holdings in NARA’s Physical and Legal Custody* (Effective: September 1, 1999)
 - NARA 1702 Supplement 1, *Transporting Holdings in NARA’s Physical and Legal Custody* (Effective: August 17, 2021)
 - NARA Directive 273, *Administrative Procedures for Security Clearances* (Effective: December 20, 2016)
 - NARA Directive 702, *Procuring Freight and Shipping Services* (Effective: October 29, 2010)
 - GSA Freight Handbook: *U.S. Government Freight Transportation Handbook* (Effective: May 2021)
 - NARA General Records Schedule: *General Records Schedules (GRS)* (Note: Because the exceptions identified in this report occurred during 2022 and 2023, the agency was evaluated against the GRS versions in effect at the time of the actions: Transmittal 32 (Effective: March 2022), Transmittal 33 (Effective: January 2023), and Transmittal 34 (Effective: June 2023).)
 - GAO, *Standards for Internal Control in the Federal Government*, GAO-25-107721 (Washington, D.C.: May 2025)
 - 41 CFR § 102-117.275 — *What performance must I expect from a TSP?*
 - 41 CFR § 102-117.100 — *What business rules must I consider before acquiring transportation or related services?*
 - 41 CFR § 102-117.175 — *What factors do I consider to determine the mode of transportation?*
 - 41 CFR § 102-118.40 — *How does my agency order transportation and transportation services?*
 - 41 CFR § 102-118.270 — *Must my agency establish a transportation prepayment audit program, and how is it funded?*

- 41 CFR § 102-118.285 — *What must be included in an agency's transportation prepayment audit program?*
- 41 CFR § 102-118.295 — *Does my agency transportation prepayment audit program need to establish appeal procedures?*
- Reviewed NARA's TSP Selection.
- Reviewed and assessed NARA's Freight and Shipping Procurement Documentation.
- Reviewed and assessed NARA's freight and shipping procurement training and policies and procedures.
- Evaluated NARA's Transportation Service Order Universe.
- Conducted interviews with NARA's Facility and Property Management Division, Federal Records Center Program, Personnel Security, and Office of Acquisitions.

We judgmentally selected and reviewed 97 freight and shipping procurements totaling \$7,626,737.70, out of 315 total procurements valued at \$12,386,881.07. The selection was based off of quantitative and qualitative materiality factors, including split purchases, cancellations, blank items, varied transportation service providers, varied months and items shipped. Furthermore, our TSO evaluation consisted of selecting five exploratory samples out of a universe of 122 purchase card transactions totaling \$14,695 out of \$122,679. All samples were judgmentally selected and were not projected.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In planning and performing our audit, we identified the following components and underlying internal control principles, control objectives, and specific controls as significant to the audit objective:

- Control Activities – Implement Control Activities
- Control Activities – Appropriate documentation of transactions and control activities
- Information and Communication – Use of Quality Information

We assessed the design, implementation and/or operating effectiveness of these internal control and identified deficiencies that we believe could affect NARA's ability to effectively procure freight shipments. The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to aspects of these internal

control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Eric Good, Senior Program Auditor (Lead), and Parker Skaats (Independent Referencer) made key contributions to this report.

Appendix B – Acronyms

Acronym	Definition
BF	Facility and Property Management Division
BOL	Bill of Lading
BPA	Blanket Purchase Agreement
CFO	Chief Financial Officer
CFR	Code of Federal Regulations
FAC-COR	Federal Acquisition Certification for Contracting Officer's Representatives
FY	Fiscal Year
GAO	Government Accountability Office
GSA	General Services Administration
MCC	Merchant Category Code
NARA	National Archives and Records Administration
OIG	Office of Inspector General
TMSS	Transportation Management Services Solution
TSO	Transportation Service Order
TSP	Transportation Service Provider

Appendix C – Summary of Monetary Results

Finding No.	Recommendation	Description	Amount	Category	Agency Response	OIG Response
1	1	Invoices	\$5,510,460.88	Unsupported Cost	Concurred	Concurred

Appendix D – Management Response



Business
Support
Services

Date: September 25, 2026

To: William Brown, Acting Inspector General

From: Valorie F. Findlater
Chief of Management and Administration and Acting Executive
for Business Support Services

Subject: Management's Response to OIG Report, *Audit of NARA's Freight and Shipping
Procurement Process*

We appreciate the efforts of your staff in the subject audit report. Attached is our corrective action plan for the 13 recommendations. As each recommendation is satisfied, we will provide documentation to your office. If you have questions about this action plan, please contact NARA's Accountability Office at accountability@nara.gov.

KIMBERLY BOYKIN

Digitally signed by KIMBERLY
BOYKIN
Date: 2026.09.25 14:33:19 -04'00'

Kimberly Boykin for Valorie Findlater

Valorie F. Findlater
Chief of Management and Administration and Acting Executive for Business Support Services

Attachment

Action Plan Response to OIG Report
Audit of NARA's Freight and Shipping Procurement Process

Recommendation 1: The Executive for Business Support Services should strengthen existing invoice retention policies to ensure full auditability of freight and shipping procurement records.

Planned Action: Business Support Services will develop and implement formal guidance for the retention of invoices in accordance with the Business Support Services file plan.

Target Completion Date: October 30, 2026

Recommendation 2: The Executive for Business Support should ensure all NA Form 6062s are fully completed, including the required signatures.

Planned Action: Business Support Services will develop and implement formal guidance requiring all NA Form 6062s be fully completed, including obtaining required signatures.

Target Completion Date: October 30, 2026

Recommendation 3: The Executive for Business Support Services should reinforce current policies regarding management approval documentation for all freight and shipping procurements before execution.

Planned Action: Business Support Services will develop and implement formal guidance verifying NA Form, 6062s have documented management approval from offices before execution of freight and shipping procurements. The requirement for offices to review and approve documentation will be communicated by Business Support Services reinforcing current freight and shipping policies.

Target Completion Date: December 31, 2026

Recommendation 4: The Executive for Business Support Services should develop and implement a centralized process to track and reconcile all freight and shipping procurements per procurement (e.g. per disposal, relocation).

Planned Action: Business Support Services will develop and implement formal guidance to centrally track and reconcile all freight and shipping procurements per procurement.

Target Completion Date: October 30, 2026

Recommendation 5: The Executive for Business Support Services should reinforce Transportation Service Provider (TSP) driver vetting and documentation processes to ensure only authorized and cleared individuals can transport sensitive holdings.

Planned Action: Business Support Services will develop and implement formal guidance to coordinate with the Office of Human Capital for their review and approval of vendor's Visitor Access Requests for cleared individuals transporting sensitive holdings.

Target Completion Date: October 30, 2026

Recommendation 6: The Executive for Business Support Services should establish a requirement to include the reason for each procurement in the Bill of Lading (BOL) dataset, and either remove incomplete BOL entries or provide mandatory notes justifying their inclusion to ensure dataset integrity.

Planned Action: Business Support Services will develop and implement formal guidance to track each procurement in the BOL dataset, including all required fields that must be completed.

Target Completion Date: October 30, 2026

Recommendation 7: The Executive for Business Support should establish and implement a Multiple-Award Blanket Purchase Agreement (BPA) under the GSA Multiple Award Schedule (MAS) when selecting Transportation Services Providers (TSP) for relocations, to avoid anti-competitive selection, and allow for agility in addressing complex requirements in accordance with FAR8.405-3.

Planned Action: Business Support Services will establish and implement a BPA or an alternative Multiple Award Contract through the GSA or U.S. Transportation Command (TRANSCOM) for relocations.

Target Completion Date: October 30, 2026

Recommendation 8: The Executive for Business Support Services develop and implement procedures for Transportation Service Provider (TSP) vetting and selection by utilizing a selection plan that defines the specific rationale for each TSP selection from the GSA Transportation Management Services Solution (TMSS) system, that is not covered under the BPA.

Planned Action: Business Support Services will develop and implement formal guidance for TSP vetting and selection, including the rationale for each TSP selection from the GSA TMSS system, that is not covered under the BPA.

Target Completion Date: October 30, 2026

Recommendation 9: The Executive for Business Support Services identify staff and management involved in the Transportation Service Provider (TSP) selection process and require them to obtain Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR) Level I certification.

Planned Action: In collaboration with the Federal Records Centers Program, Business Support Services will identify NARA employees involved in the TSP selection process and require the identified employees obtain the FAC-COR Level I certification.

Target Completion Date: August 31, 2027

Recommendation 10: The Chief of Management and Administration should work with applicable NARA units to perform a comprehensive review of NARA directive 702 and NARA directive 1702, and applicable supplements related to NARA's freight and shipping procurement process, to ensure alignment with current federal regulations, operational needs, potential gaps in internal controls, and establish a regular review cycle to prevent future obsolescence.

Planned Action: The Chief of Management & Administration will coordinate with Business Support Services and the Office of the Chief Operating Officer to update and implement NARA directive 702, NARA directive 1702, and applicable supplements respectively.

Target Completion Date: August 31, 2027

Recommendation 11: The Chief of Management and Administration should work with applicable NARA units to develop and implement formal, documented training for all staff involved in NARA's freight and shipping procurement process, ensuring oversight and compliance with NARA directives, federal regulations, and operational needs.

Planned Action: The Chief of Management & Administration will coordinate with Business Support Services and the Office of Human Capital to develop and implement a formal training program for all staff involved in NARA's freight shipping and procurement process.

Target Completion Date: August 31, 2027

Recommendation 12: The Executive for Business Support Services should work with Executives for applicable NARA units to establish a dedicated line of communication with Business Support Services regarding submission of Transportation Services Orders (TSO) documentation. This channel must facilitate end-to-end supervision of all documentation, handling, and other direct controls pertinent to NARA holdings.

Planned Action: Business Support Services will develop and implement a formal communication plan to share formal guidance, including TSO documentation requirements, on freight and shipping procurements with all organizations.

Target Completion Date: December 31, 2026

Recommendation 13: The Executive for Business Support Services should work with the Chief Financial Officer to establish and implement a transportation pre-payment audit program, approved by the CFO, and includes an appeals process that ensures compliance with the regulatory frameworks of 41 CFR 102-118.

Planned Action: Business Support Services will request approval from the Chief Financial Officer to participate in a third-party payment system to conduct pre-payment, post-payment audits and appeals on all of NARA's Transportation Service Orders.

Target Completion Date: December 31, 2026

Appendix E – OIG Response to Management

The OIG considers NARA's planned corrective actions responsive to our recommendations.

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 emails through the Hotline email system and an online referral form. Visit <https://naraoig.oversight.gov/> for more information, or contact us:

By telephone

Washington, DC, Metro area: 301- 837-3000

Toll-free: 800-786-2551

By facsimile

301-837-3197

By online referral form

<https://naraoig.oversight.gov/online-complaint-form>

Contractor Self-Reporting Hotline

As required by the Federal Acquisition Regulation, a web-based form allows NARA contractors to notify the OIG, in writing, whenever the contractor has credible evidence a principal, employee, agent, or subcontractor of the contractor has committed a violation of the civil False Claims Act or a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations in connection with the award, performance, or closeout of a contract or any related subcontract. The form can be accessed through the OIG's home page or found directly at <https://naraoig.oversight.gov/oig-contractor-reporting-form>.