NATIONAL ARCHIVES

OFFICE *of* INSPECTOR GENERAL

Fiscal Year 2024
Management and Performance Challenges

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Contents

National Archives and Records Administration

NARA drives openness through access to records. NARA's mission is stated as:

> Our mission is to provide equitable public access to federal government records in our custody and control. Equitable access to government records strengthens democracy by allowing all Americans of all backgrounds to claim their rights of citizenship, hold their government accountable, and understand their history so they can participate more effectively in their government.

In FY 2023, NARA was appropriated $388.3 million for operating expenses, including $29 million for expenses necessary to enhance the federal government's ability to electronically preserve, manage, and store government records, and $2 million to implement the Civil Rights Cold Case Records Collection Act; $71 million for Repairs and Restoration, including $20 million for the Ulysses S. Grant Presidential Library in Starkville, Mississippi, and $11.5 million for the Harry S. Truman Library Institute for National and International Affairs in Kansas City, Missouri; $12.3 million for National Historical Publications Records Commission grants; and $5 million for IG operations. With approximately 2,556 employees, NARA operates 44 facilities nationwide.

OIG Mission and Authority

NARA's OIG was formally established in April 1989. The Inspector General Act, as amended (IG Act) states the IG is responsible for:

- making such investigations and reports relating to the administration of NARA's programs and operations as are, in the judgment of the IG, necessary or desirable;
- conducting and supervising independent audits and investigations of agency programs and operations;
- promoting economy, effectiveness, and efficiency within the agency;
- detecting and preventing fraud, waste, mismanagement, and abuse of and in agency programs and operations; and
- making recommendations designed to promote the economy, efficiency, and effectiveness of the agency.

Unique in the federal system, the IG is required to keep both the Archivist and Congress fully and currently informed about fraud and other serious problems, abuses, and deficiencies relating to NARA's programs and operations.

NARA Management and Performance Challenges for FY 2024

In executing the OIG mission, the OIG summarizes what we consider to be the most significant management and performance challenges facing NARA and assess the agency's progress in addressing those challenges. The following summarizes those challenges based on legislative mandates, our experience, stakeholder input, and observations from our oversight work.

1. Records Request Backlog at the National Personnel Records Center (NPRC)
2. Information Technology (IT) Security
3. Electronic Records Archives
4. Transition to Electronic Records
5. Expanding Public Access to Records
6. Human Capital Management

CHALLENGE 1: Records Request Backlog at National Personnel Records Center (NPRC)

One of NARA's most important responsibilities is to provide access to military service records to veterans and other stakeholders. The pandemic has had a significant, adverse impact on NPRC's performance in this regard, resulting in an unprecedented backlog which peaked at over 600,000 requests in 2022. Since then, NPRC has made significant progress and reported elimination of its backlog in January 2024. NPRC continuously receives new requests; currently at the rate of 6,000 per day. Therefore, NPRC will always have an inventory of pending requests. The overall volume of pending requests has been reduced to 61,009 as of March 25, 2024 and NPRC is currently servicing more than 36,000 requests per week. NPRC serviced more than 1.5 million requests during FY2023, the largest number of requests the NPRC has ever completed in a single year. In 2023, Congress extended the NPRC timeliness measure to service a request from 10 working days to 20 working days. Also, Congress established a performance target for NPRC to complete 90 percent of requests within 20 working days. The median response time on routine requests for separation documents (the documents most often needed by veterans to obtain benefits) has been reduced to four workdays. Most VA requests are serviced in three work days or less. Significant progress has also been made on the digitization of NPRC holdings and improvements to NPRC systems to facilitate the electronic servicing of requests. NPRC responded to more than 600,000 requests electronically during FY 2023. However, opportunities exist for NPRC to continue to increase its electronic processing of requests.

The pandemic and subsequent backlog presented one of the greatest challenges ever faced by NPRC, but it led to changes, particularly with regard to transitioning NPRC's holdings and processes to an electronic environment. Providing access to military service records remains one of NARA's most important responsibilities.

Completed Actions
- Increased staffing by 152 FTE and 28 contractor FTE
- Significant reconfiguration of office space to support larger numbers of staff and contractors
- Facilitated collaboration between the Department of Justice, the Department of Navy, and the Department of Veterans Affairs to develop an efficient strategy to leverage VA digitization resources to respond to legal demands associated with the Camp LeJeune Justice Act
- Partnered with the VA to identify, retrieve, and digitize records that are potentially responsive to new claimant activity associated with the Honoring our Pact Act
- Upgraded eVetRecs to allow for digital signatures, electronic status checks, and submission of emergency requests

Ongoing Actions
- Continued partnering with the VA to accelerate digitization of NPRC holdings
- Developing a new Case Management and Reporting System
- Providing regular updates to Congress as required by the FY23 National Defense Authorization Act
- Planning to integrate Robotic Process automation (RPA) in next generation CMRS

Completed Actions
- Deployed network infrastructure improvements and increased bandwidth for NPRC staff
- Built a successful prototype application using Robotic Process Automation (RPA)
- Built and deployed digital delivery functionality
- Deployed functionality to ingest digital records from the VA into NPRC's production system and make them available to NPRC technicians
- Delivered Cloud based Virtual Desktop Infrastructure (VDI) solution to allow on-site and remote workers to access the VA's newly digitized records securely using a PIV card
- Updated existing policy to enable access for onsite CMRS users to digitized VA records

CHALLENGE 2: Information Technology (IT) Security

NARA labeled IT security a "material weakness" under the Federal Managers' Financial Integrity Act (FMFIA) from 2007 to 2020 with exceptions in 2013 and 2014, when it was considered a "reportable issue." In FY 2021, NARA again labeled IT security a "material weakness" and kept that label through FY 2023. Further, over the past decade annual Federal Information Security Modernization Act (FISMA) audits or assessments have consistently identified IT areas in need of significant improvement.

Many of NARA's issues stem from control weaknesses which contribute to underdeveloped or ineffectively implemented policies and procedures. The security planning and oversight for NARA's high value assets and classified systems is not completely effective, potentially putting the agency's mission and national security information at risk.

NARA has introduced initiatives to promote a mature program and has made progress. However, NARA needs to establish an effective system of internal control for information security. NARA must ensure the security of its data and systems or risk undermining the agency's credibility and ability to meet its mission.

Completed Actions
- Completed security assessment and authorization for of FISMA systems
- Implemented a new enterprise patch management solution to improve deployment of patch updates and reach NARA endpoints over the internet.
- Deployed a component of CISA's Continuous Diagnostics and Mitigation Tools (CDM), as NARA's primary anti-virus solution and it also serves as an established and Endpoint Detection and Response capability
- Completed updating all system-level configuration management plans
- Expanded the automated process for user account reviews to additional systems
- Completed Digital Identity Risk Assessments (DIRAs) for NARA systems
- Established a network asset inventory through the CDM provided tool
- Deployed optional phishing-resistant multi-factor authentication for the public NARA
- Catalog website through the use of login.gov
- Implemented encryption of sensitive data in transit of NARA systems
- Verified implementation of encryption of data at rest for 61% of NARA systems

Ongoing Actions
- Continue to implement requirements and meet the milestones of Executive Order 14028 (Improving the Nation's Cybersecurity), OMB Memorandum 22-09 (Federal Zero Trust Strategy), and OMB Memorandum 21-31 (Improving the Federal Government's Investigative and Remediation Capabilities Related to Cybersecurity Incidents)
- Continue efforts to further improve vulnerability and patch management processes, hardware and software inventory processes and continue to identify and further secure critical software
- Develop and implement supply chain risk management processes in accordance with OMB Memorandum 22-18
- Continue further implementation of PIV mandatory authentication for user access to NARA systems
- Select and implement application control solutions for NARA endpoints
- Begin deployment of additional non-PIV MFA alternatives
- Deploy a privileged access management (PAM) solution for NARA
- Continue work to assess and authorize NARA classified systems

CHALLENGE 3: Electronic Records Archives (ERA)

Electronic records are the future of government archiving, and NARA must become a world leader in preserving, storing, and presenting electronic records to meet its mission. NARA's plan to address this is the ERA system. Initially billed as a solution for storing files in any format for indefinite future access, the program has experienced delays, cost overruns, funding shortfalls, and technical short-comings virtually since inception. As a result, many core requirements from initial plans have never been addressed, and ERA does not have the capabilities originally envisioned. Further, stakeholders expect more capabilities, such as online access and searching, that drive openness and cultivate public participation.

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. Yet the ERA 2.0 timeline continues to slip, and a version for classified records is not expected until at least FY 2024. ERA 2.0 has been put into production and is used by some NARA staff who work with digital materials. On April 17, 2023, ERA 2.0 was expanded for all Federal agencies to use ERA 2.0 for records scheduling and transfer processes. However, until ERA 2.0's functionality is built and put into full production, the current ERA's longstanding deficiencies may continue to impact NARA.

Additionally, the vast volumes of electronic records that will need to be preserved are simply staggering, and NARA is challenged to meet data storage requirements for them. NARA's in-house data storage is reaching capacity, impacting the agency's digitization efforts and other IT programs. Without sufficient storage, NARA would have difficulty accepting, storing, and processing electronic records or make them available to the public.

ERA impacts other NARA programs. For example, the physical media that electronic and audiovisual records are stored on age and degrade every day. As computer programs become obsolete, records stored in those formats may become impossible to use. NARA cannot provide access to records unless it can preserve them for as long as needed. ERA was initially envisioned to address these preservation issues, but currently does not provide a complete solution. Without action, pieces of the unique history of America may be lost.

Completed Actions	Ongoing Actions
• Launched ERA 2.0 for use by Federal agencies and NARA staff working in records scheduling and transfers of permanent Federal records • Implemented procedures for internal cloud-to-cloud transfers of digital files • Completed the upload and ingest of the remaining holdings uniquely held on physical media to ERA 2.0	• Development efforts underway to implement Access Review and Redaction capabilities in ERA 2.0 and integration with NARA's Description & Authority Services • Developing acceptable format guidelines, updating digital transfer guidance, and the digital preservation framework

CHALLENGE 4: Transition to Electronic Records

In June 2019, NARA and OMB jointly issued OMB Memorandum M-19-21, *Transition to Electronic Records*, establishing new government-wide goals for electronic recordkeeping to transition to a fully electronic (paperless) government. M-19-21 directed agencies to manage *all* of their permanent records in electronic format by December 31, 2022. This represents a major transition for the entire government, and nothing short of a potential avalanche of electronic records coming towards NARA. In December 2022, OMB and NARA issued Memorandum M-23-07, *Update to Transition to Electronic Records*. This memorandum reinforced the requirements established in M-19-21, reaffirmed the underlying goal of the transition to electronic records, and extended the target date to June 30, 2024.

While the ERA system is intended to handle electronic records NARA receives, NARA must ensure permanent records are in fact preserved and sent to NARA in the first place. NARA works with Federal agencies to ensure proper appraisal, scheduling, and transfer of permanent records in all formats. 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, NARA does not know whether the systems in place will be able to ingest, process, preserve, store, and provide access to future electronic records. However, NARA has issued guidance on preferred file formats for permanent electronic records as a strategy to mitigate the risk of archiving multiple electronic records file formats. NARA, and the rest of the government, is challenged with meeting the deadlines in M-23-07 while determining how best to manage electronic records and make e-Government work more effectively.

Completed Actions
- Issued semi-annual reports of NARA's records management oversight activities that identifies best practices, lessons learned, and recommendations for executive action for NARA and all federal agencies
- Conducted webinar on Preparing Transfer Requests in ERA 2.0 publicly available on NARA's YouTube
- Issued regulations with digitization standards for permanent paper and photographic print records
- Issued supporting products to help agencies implement the digitization standards
- Issued guidance (NARA Bulletin and GRS) to expand the Capstone approach to managing email to more e-messaging formats, including texts, chats, and instant messages

Ongoing Actions
- Implementing electronic system audits of agency systems to ensure they are compliant with NARA's recordkeeping requirements
- Managing agency requests for exceptions relating to the transition to electronic records, taking action to review, approve/disapprove, and monitor progress
- Issuing further regulations with digitization standards for film records and dynamic media records
- Working with GSA on requirements for vendor services related to digitizing federal records
- Adding an inventory of permanent and unscheduled electronic records over 5TB to the Federal Agency Records Management reporting data call

CHALLENGE 5: Expanding Public Access to Records

Records that cannot be accessed simply cannot be used, and the public expects more and more records to be easily accessible online. NARA's strategic goal to "Make Access Happen" affirms public access as NARA's core purpose, and NARA has committed to digitize the nation's archives and make them available online. This goal is a massive undertaking involving billions of pages, films and photographic media, and other records. However, NARA's historic digitization approaches were not large enough to make significant progress. For example, insufficient planning and system limitations kept millions of records digitized by NARA partners from being made accessible to the public in an efficient and timely manner. NARA must ensure the appropriate management, controls, and resources are in place to successfully implement an effective digitization strategy and expand public access to records.

At a basic level, in order to "Make Access Happen" NARA must gain physical and intellectual control over its holdings. That is, NARA must physically control the records and know what they are. This initial step is referred to as archival processing. However, NARA reports ten percent of its analog holdings have not been processed, so the public does not have efficient and effective access to them. Thus, the agency has begun an initiative to accelerate archival processing to increase the records available for research. To meet its mission, NARA must work to ensure it has the processes and resources necessary to establish intellectual control over these 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. This work includes standardizing processing procedures across the agency, strengthening internal controls, and monitoring performance.

Completed Actions
- Processed over 90% of traditional holdings
- Constructed, equipped, and staffed a fully operational and state-of-the-art mass digitization facility at Archives II
- Selected staff for over 60% of the positions created from the Equitable Access to history (EAH) budget initiative
- Purchased three high-speed conveyor belt scanners, several large format feed-through scanners, camera systems, and other pieces of scanning and camera equipment from EAH budget
- Office of Innovation introduced cloud to cloud transfer of digitization partnership content

Ongoing Actions
- Continuing to consider improvements to both NARA's Description & Authority Services (DAS) and the Catalog to ensure the systems can scale and perform to meet NARA's strategic goals
- Next Generation DAS development project underway, planned to launch in FY 2024
- Office of Innovation introduced cloud to cloud transfer of digital objects from ERA 2.0 to DAS and the Catalog
- NARA's Reparative Description and Digitization Working Group (RDDWG) and staff from other offices are working to expand public access through reparative and enhanced description and the digitization of records that meet the needs of underserved and underrepresented communities
- Research Services launched a NARA microfilm digitization effort
- Building and launching a Mass Digitization Facility at Archives II

CHALLENGE 6: Human Capital Management

For more than two decades, strategic human capital management has been a high-risk area government-wide in part because of the need to address current and emerging skills gaps that are undermining agencies' abilities to meet their missions.[1] 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 FY2023 NARA reported Human Capital practices as a reportable condition. NARA has stated internal controls over the program area are improving and NARA continues to collaborate with its shared service provider to ensure human resource data is correct for all current and former employees.

Completed Actions
- Obtained direct hire authority from OPM for NPRC, resulting in the significant reduction, almost elimination, of the hiring backlog
- Expanded non-competitive hiring authorities, such as veterans and Schedule A, military spouses, and Peace Corps
- Developed and launched a repository specifically designed for Veterans and Schedule A candidates for maintaining resumes of eligible candidates for non-competitive hiring
- Conducted hiring job fairs to increase interest in NARA jobs
- Reviewed 100% of former employee records and 83% of active employee records, identifying and correcting errors as needed. This included a comprehensive review of eOPFs to ensure completeness and accuracy

Ongoing Actions
- Expanding the Pathways internships program
- Centralizing unpaid internships program
- Conducting strategic outreach in geographic locations that have had difficulties in filling positions
- Training managers and supervisors in building job announcements and assessment questions to improve their applicant pools.
- Reviewing NARA Merit Promotion Plan and making revisions where necessary.
- Ongoing review of active employee records for accuracy and completeness

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[1] Source: GAO High-Risk Series, GAO-23-106203

OIG Hotline

The OIG Hotline provides a confidential channel for reporting fraud, waste, abuse, and mismanagement to the OIG. In addition to receiving telephone calls at a toll-free Hotline number and letters to the Hotline post office box, we also accept emails through the Hotline email system and an online referral form. Walk-ins are always welcome. Visit *www.archives.gov/oig/* or *http://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 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.