NATIONAL ARCHIVES

OFFICE *of* INSPECTOR GENERAL

Audit of NARA's Corporate Records Management Program (22-AUD-05)

March 30, 2022

ARCHIVES OF THE UNITED STATES OF AMERICA

March 30, 2022

TO: David Ferriero
           Archivist of the United States

FROM: Dr. Brett M. Baker
           Inspector General

SUBJECT: *Audit of NARA's Corporate Records Management Program*
           OIG Audit Report No. 22-AUD-05

Attached is the Office of Inspector General's final report of our *Audit of NARA's Corporate Records Management Program.* The report contains 18 recommendations intended to strengthen NARA's internal controls over its corporate records. Agency staff provided formal comments which are included in this report.

Please provide planned corrective actions and expected dates to complete the actions for each of the recommendations within 30 days of the date of this report. As with all OIG products, we determine what information is publicly posted on our website from the attached report. Consistent with our responsibility under the *Inspector General Act of 1978, as amended*, we may provide copies of our report to congressional committees with oversight responsibility over NARA.

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

cc: Debra Wall, Deputy Archivist of the United States
       William J. Bosanko, Chief Operating Officer
       Meghan Guthorn, Deputy Chief Operating Officer
       Deborah Armentrout, Director, Corporate Records Management
       Kimm Richards, Accountability
       Jewel Butler, Assistant Inspector General for Audits
       Kimberly Boykin, Audit Director
       William Brown, Senior Program Auditor
       United States House Committee on Government Reform and Oversight
       Senate Homeland Security and Governmental Affairs Committee

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Executive Summary

Why Did We Conduct This Audit?

The National Archives and Records Administration's (NARA) Office of Inspector General (OIG) conducted the audit to evaluate the effectiveness of NARA's Corporate Records Management Program (CM) and its compliance with applicable Federal records management policies and procedures. In June 2019, the Office of Management and Budget (OMB) in conjunction with NARA issued Memorandum M-19-21 (M-19-21), *Transition to Electronic Records*. The memorandum specifically focuses on records management and directs Federal agencies to transition recordkeeping to a fully electronic environment that complies with all records management laws and regulations. With the unique role of being responsible for the records management program in the agency serving as the Nation's recordkeeper, it is important the CM Program leads by example.

What Did We Recommend?

We made 18 recommendations to strengthen NARA's internal controls over its corporate records. Management concurred with the recommendations in this report.

What Did We Find?

While NARA designed controls for its CM Program, we found additional controls are needed to improve the efficiency of the program. CM is challenged to meet M-19-21 targets. In addition, we found CM has not provided effective oversight of NARA's electronic records management systems; has not fully instituted effective controls over its disposition process; has not effectively used NARA's Records and Information Management (RIM) Network; and has not ensured directives are established and/or up to date. These conditions are attributed to insufficient internal and oversight controls, training, competing staff priorities, and COVID-19 restrictions.

Without meeting the targets of M-19-21, the CM Program may need to continue to devote resources to creating, using, and storing analog records which should more effectively be applied to electronic records thus increasing the burden on citizens conducting business with the government. Additionally, without effective controls and planning coupled with necessary training, NARA may not be aware of increased risk to temporary and permanent records and gaps in program office compliance. NARA may also experience records eligible for disposition continuing to become past due, and additional storage costs to NARA.

Summary of Recommendations

Finding 1: NARA is Not on Track to meet Office of Management and Budget Memorandum M-19-21 Targets

Number	Recommendation	Responsible Office
1	Implement a plan with actionable steps and timeline to achieve Office of Management and Budget Memorandum M-19-21 targets.	Corporate Records Management
2	Ensure annual records management training encompasses all required information per NARA Bulletin 2017-01.	Corporate Records Management
3	Develop targeted records management training for political appointees, senior agency officials, and senior executives.	Corporate Records Management
4	Develop a plan with actionable steps, timelines, and measurable indicators to track progress of records schedule updates.	Corporate Records Management
5	In collaboration with responsible NARA offices, (e.g. Office of Acquisitions, Research Services, Human Capital, and Legislative Archives, Presidential Libraries, and Museum Services), ensure all NARA staff, including contractors and volunteers, take annual records management training.	Chief Operating Officer

Finding 2: Oversight of Electronic Records Management Systems Needs Improvement

Number	Recommendation	Responsible Office
6	Determine data necessary for effective oversight of corporate records and work with system contractor to obtain desired reports.	Corporate Records Management
7	Implement procedures for monitoring of system reports on email and permanent records.	Corporate Records Management
8	Implement procedures for Corporate Records Management staff to evaluate information system compliance with records management requirements.	Corporate Records Management

Finding 3: Disposition of Corporate Records Needs Improvement

Number	Recommendation	Responsible Office
9	Develop and implement standard operating procedures for disposition of agency corporate records.	Corporate Records Management
10	Develop a plan with timelines to delete temporary emails.	Corporate Records Management

Number	Recommendation	Responsible Office
11	Incorporate use of the Archives and Records Centers Information System disposal module in Corporate Records Management's disposal processes.	Corporate Records Management

Finding 4: NARA's Records and Information Network Needs Improvement

Number	Recommendation	Responsible Office
12	Implement procedures to ensure Records and Information Management Network office records liaison roles are filled timely.	Corporate Records Management
13	Develop and implement procedures for annual evaluations of program office records management.	Corporate Records Management
14	Provide annual training to Information Management Officers on their roles and responsibilities.	Corporate Records Management
15	Identify additional methods for communicating records management information throughout the agency.	Corporate Records Management

Finding 5: Records Management Guidance Needs Improvement

Number	Recommendation	Responsible Office
16	Incorporate interim guidance into final policy directives per established guidance.	Corporate Records Management
17	Finalize procedures for the vital records program.	Corporate Records Management
18	Revise procedures to ensure current records management requirements are detailed in policies.	Corporate Records Management

Background

Under Title 44 United States Code (U.S.C.) Chapter 31, the head of each Federal agency shall make and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency. Further, the head of each agency shall establish and maintain an active, continuing program for the economical and efficient management of the records of the agency. The National Archives and Records Administration's (NARA) Corporate Records Management (CM) Program is responsible for developing, implementing, and leading an agency-wide corporate records management program that ensures the adequate and proper documentation of NARA's operations in accordance with federal laws, regulations, and mandates for the economical and efficient management of the resulting federal records. CM maintains a unique role of being responsible for the records management program in the agency serving as the Nation's recordkeeper. CM reports to the Chief Operating Officer, who serves as the Senior Agency Official for Records Management (SAORM). CM's Director serves as NARA's Agency Records Officer (ARO), with responsibility for promulgating and, in coordination with the Chief Records Officer, obtaining the Archivist's approval for all necessary records schedules for records created and received by NARA.

In June 2019, the Office of Management and Budget (OMB) in conjunction with NARA issued Memorandum M-19-21 (M-19-21), *Transition to Electronic Records*. The memorandum specifically focuses on records management and directs Federal agencies to transition recordkeeping to a fully electronic environment that complies with all records management laws and regulations. Section I of M-19-21 establishes deadlines for all agencies to adopt electronic recordkeeping requirements and establishes four targets for agencies must meet in order to begin the transition to a fully electronic government:

- Target 1.1 states by 2019, federal agencies will manage all permanent electronic records in an electronic format.
- Target 1.2 states by 2022, federal agencies will manage all permanent records in an electronic format and with appropriate metadata.
- Target 1.3 states by 2022, federal agencies will manage all temporary records in an electronic format or store them in commercial records storage facilities.
- Target 1.4 states federal agencies will maintain robust records management programs that comply with the Federal Records Act and its regulations, and provides five practices agencies must continue to ensure agency records are appropriately retained, stored, and transferred according to their disposition schedules.

NARA Directive 860, *NARA Corporate Records Management Program*, establishes NARA's CM Program and identifies the program's objectives, roles and responsibilities of NARA

officials and designated personnel, and the authorities for the creation, maintenance, and disposition of NARA's records. The directive also forms the basis for a policy framework to support electronic recordkeeping requirements and designates the CM staff as responsible for establishing and implementing records management policy. It states NARA staff who create records, or who manage systems that create and maintain records, must ensure those records are managed properly. It also states CM will work with NARA staff to ensure they understand how to meet their recordkeeping responsibilities to carry out the disposition instructions for eligible corporate records and move NARA toward electronic recordkeeping.

The supplement to NARA 860 provides policy on managing NARA permanent electronic records. It provides requirements for NARA organizations to follow in order to bring NARA into compliance with Target 1.1 of M-19-21. NARA Interim Guidance 861-1, *Managing Electronic Messages*, establishes NARA policies and procedures governing the management of electronic messages.

NARA's ARO and CM use the Records and Information Management Guidelines (RIM-G) to issue records and information management guidance, provide updates about records retention schedules, provide best practices, or share general records management information that needs to be communicated to the established Records and Information Management (RIM) Network. The RIM Network audience includes Information Management Officers (IMOs), Records Custodians (RCs), applicable managers, general staff, and contractors as appropriate. The fundamental intent of RIM-G is to promote better compliance with recordkeeping requirements under Title 44 U.S.C.

Objective, Scope, Methodology

Objective

The audit objective was to evaluate the effectiveness of NARA's CM Program and its compliance with applicable Federal records management policies and procedures.

Scope and Methodology

To accomplish our audit objective, we performed audit procedures from the auditor's approved COVID-19 public health emergency telework location. The audit was performed from July 2021 through December 2021. Specifically, we performed the following:

- Reviewed Title 44 U.S.C. Chapters 29, 31, and 33, various parts of Title 36 Code of Federal Regulations (C.F.R.), and M-19-21.
- Reviewed NARA Directives 101, 860 (and its Supplement), and Interim Guidance 861-1 to determine policies in place.
- Reviewed NARA Bulletins, Strategic Plans, SAORM Reports, and RIM-Gs.
- Reviewed CM's 2020-2022 Strategic Plan, training presentations, business case, business needs, various draft internal procedures, charters, emails, and disposition reports.
- Reviewed organizational charts, system reports and data, internal control reports, risk assessments, and program assessments.
- Interviewed various officials within CM to obtain an understanding internal controls within the program.
- Performed judgmental sampling of records management requirements in 15 out of 297 NARA Directives.
- Performed a walkthrough of CM's electronic records management system to understand its capabilities and how CM staff utilized the system for records management.

This performance audit was conducted in accordance with generally accepted government auditing standards. Those standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

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

- Control Environment – Establish Structure, Responsibility, and Authority
- Control Activities – Design Control Activities and Implement Control Activities

- Information and Communication – Communicate Internally
- Monitoring – Perform Monitoring Activities

We assessed the design, implementation, and operating effectiveness of these internal controls and identified deficiencies we believe could affect NARA's ability to effectively and efficiently operate its corporate records management program. 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.

Kimberly Boykin, Audit Director, William Brown, (Lead) Senior Program Auditor; and Carol Seubert (Independent Referencer) Senior Program Auditor, made key contributions to this report.

Audit Results

While NARA designed controls for its CM Program, we found additional controls are needed to improve the efficiency of the program. CM is challenged to meet M-19-21 targets. In addition, we found CM has not provided effective oversight of NARA's electronic records management systems; has not fully instituted effective controls over its disposition process; has not effectively used NARA's RIM Network, and has not ensured directives are established and/or up to date. These conditions are attributed to insufficient internal and oversight controls, competing staff priorities, and COVID-19 restrictions.

Without meeting the targets of M-19-21, NARA may need to devote resources to analog records which should more effectively be applied to electronic records thus increasing the burden on citizens by requiring them to conduct business with the government in person or by mail. Additionally, without effective controls and planning coupled with necessary training, NARA may not be aware of increased risk to temporary and permanent records and gaps in program office compliance. NARA may also experience records eligible for disposition continuing to become past due, and additional storage costs to NARA.

Finding 1.   NARA is Not on Track to meet Office of Management and Budget Memorandum M-19-21 Targets

CM faces challenges in meeting Targets 1.2, 1.3 and 1.4 of M-19-21. Specifically, CM faces challenges in managing permanent records for transfer to NARA, managing temporary records electronically, and implementing records management best practices. These challenges are caused by insufficient monitoring activities including not developing tracking mechanisms, success indicators, and resource planning, competing staff priorities, and COVID-19 restrictions. M-19-21 directs Federal agencies to transition recordkeeping to a fully electronic environment that complies with all records management laws and regulations. Without meeting the targets of M-19-21, the CM program will continue to devote resources to creating, using, and storing analog records which should more effectively be applied to electronic records thus increasing the burden on citizens by requiring them to conduct business with the government in person or by mail.

Targets 1.2 and 1.3

M-19-21 recognized the importance of records management in driving transformational change in modernizing government, including moving to electronic government. To meet these targets, CM developed a three-phase plan and presented it to program offices in May 2021. The first phase, which began in July 2021, was to meet with program offices and obtain information on analog records to be transferred. The second phase called for review and completion of updated

file plans. The third phase called for offices to assist CM in updating NARA's records schedule. CM used a spreadsheet to track meetings and make notes on meeting outcomes and program office information submissions. However, CM did not take a sufficient project management focus to adequately plan actions needed to meet the deadline. CM staff had ideas of when certain actions would be taken, but no tracking mechanism to keep on schedule for needed tasks.

Phase 1 meetings were conducted with a majority of program offices by the end of Fiscal Year (FY) 2021. Program offices were to complete a standardized electronic form concerning their preparation to transition to fully electronic recordkeeping. Most offices completed the forms, but some needed additional time to complete. As of October 2021, CM had received most of the form submissions, but had not yet reviewed the information. CM had also not yet asked offices to validate their file plans. CM expected file plan reviews to occur during the second phase of its plan. CM has found issues with office file plans during prior work, thereby possibly extending the second phase of its plan.

Actions taken to meet the targets rely upon program office staff input. CM is challenged in working with program offices as program office staff assigned as IMOs have competing priorities from their other duties and cannot always devote time necessary to records management. Further, on-going COVID-19 restrictions have hindered the agency's ability to address traditional records management practices remotely. CM and program office staff need to work with boxes and view paper records, which cannot occur when working remotely. Some program offices have considered digitization of paper records, but have not yet started and would need to be on site to conduct the work. CM indicated a need to work with program offices on digitization considerations and develop policies and procedures over the work. Further, CM experienced some difficulties working with program office staff concerning interpretation of certain record schedule implementations.

Target 1.4

NARA adheres to some of the practices Target 1.4 states agencies must follow, but has not fully adhered to others. NARA has designated both a SAORM and ARO, and those positions meet the requirements of M-19-21. However, CM is challenged in providing training requirements to staff and updating and implementing its records schedule.

Training

M-19-21 requires agencies to annually inform all agency personnel of their records management responsibilities in law, regulation, and policy, and provide training specific to the practices and policies of the organization. CM provides annual records training to all NARA employees within the NARA Annual Required Training module. The Office of Human Capital tracks the completion of training for each staff member and recently developed a dashboard to allow CM to more easily assess records management training completion. CM works with Human Capital staff to determine completion rates for

employees, so CM can report on records management training completion. For FY2021, all employees were to complete the training by May 28, 2021. However, a small percentage of employees did not complete records management training timely for 2021. Also, all newly-hired NARA employees are required to take records management training within 60 days of their start date. We found new employees did not always take the training in the timeframe required.

NARA Bulletin 2017-01 details the topics records management training should cover. While most of the topics required were covered in NARA's 2021 training, there were several topics not covered including legal holds and storage of agency records. Also, targeted training for political appointees, senior agency officials, and senior executives was not provided at their arrival and departure from the agency.

NARA Bulletin 2017-01 describes training for all staff, including employees, contractors, volunteers, and others creating, receiving, accessing, or using records on behalf of the agency. OMB Circular A-130, *Managing Information as a Strategic Resource*, states agencies shall provide training and guidance, as appropriate, to all agency employees and contractors regarding their federal records management responsibilities. CM staff stated only employees take training, and while training information has occasionally been given to contractors, it is infrequent and CM was unsure if contractors receive any records management training.

Records Schedule

NARA's record schedule is outdated in parts and does not always reflect current business practices. CM identified NARA's outdated records schedule as a program risk during the audit and indicated updating the records schedule would likely take several years. In FY2020 internal control reports, CM established a monitoring plan to review and update 20 percent of NARA's records schedule during the year. However, monitoring results reported did not indicate what percentage of the records schedule was reviewed and updated. In FY2021, CM management indicated measurable indicators had not yet been established. CM planned to add a staff resource with records schedule experience to lead the effort to update the records schedule. Without an updated records schedule, the agency will face challenges in managing records electronically.

Recommendations

We recommend the Director, Corporate Records Management:

Recommendation 1: Implement a plan with actionable steps and timeline to achieve Office of Management and Budget Memorandum M-19-21 targets.

Recommendation 2: Ensure annual records management training encompasses all required information per NARA Bulletin 2017-01.

Recommendation 3: Develop targeted records management training for political appointees, senior agency officials, and senior executives.

Recommendation 4: Develop a plan with actionable steps, timelines, and measurable indicators to track progress of records schedule updates.

We recommend the Chief Operating Officer:

Recommendation 5: In collaboration with responsible NARA offices (e.g. Office of Acquisitions, Research Services, Human Capital, and Legislative Archives, Presidential Libraries, and Museum Services), ensure all NARA staff, including contractors and volunteers, take annual records management training.

Finding 2. Oversight of Electronic Records Management Systems Need Improvement

CM exercises insufficient oversight of records management in electronic systems. We found they are not fully utilizing system capabilities, not fully monitoring systems for compliance, and not sufficiently monitoring system reports. The condition occurred because CM does not have sufficient technical knowledge, processes, and systems to evaluate effectiveness or compliance. NARA Directive 101 Part 2 states CM's Director operates and administers technologies used to manage and store corporate records and information. NARA Interim Guidance 861-1 states CM's Director manages NARA's electronic messaging recordkeeping systems. As a result, CM may not make efficient use of its systems and may not timely become aware of electronic records management issues which may increase risk to permanent records and impact the proper administration of disposition on records.

In 2013, CM instituted a records management system to comply with OMB Memorandum M-12-18 for Capstone[1] email records management. The use of the system was expanded to include management of permanent electronic records. While NARA staff believed the system worked, it has additional functionalities (e.g. audit capability) CM staff does not use often. Staff indicated the system was not intuitive to use and staff had difficulty learning how to fully utilize the system, especially as staff did not use the system on a daily basis.

Further, the system produces reports on email records, but not permanent non email records. CM staff wanted more detailed email reports, but struggled understanding the full extent of system reporting capability and noted issues working with the system contractor. CM staff reported monitoring the email reports found adequate statistics and no anomalies in data. CM also reported staff had not established a measurable trend baseline for email. We analyzed reports from April-July 2021 and found data discrepancies related to permanent email retention. Specifically, we found:

- Unreconciled decrease in permanent records in one month.
- Certain Capstone officials continuing to receive permanent email after departure from the agency.
- Reports of active Capstone users who are no longer active.

CM is appropriately seated on several information technology governance boards to provide input into records management requirements for NARA information technology systems. However, after implementation, CM lacks insight into the records management operation of those systems. Without insight into systems generating electronic records, CM staff is challenged

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[1] The Capstone approach to email offers agencies the option of using a more simplified and automated approach to managing email that allows for the categorization and scheduling of email based on the work and/or position of the email account owner.

to evaluate compliance with records management requirements. CM is drafting policy to better allow staff to oversee continued system adherence to records management requirements.

Recommendations

We recommend the Director, Corporate Records Management:

Recommendation 6: Determine data necessary for effective oversight of corporate records and work with system contractor to obtain desired reports.

Recommendation 7: Implement procedures for monitoring system reports on email and permanent records.

Recommendation 8: Implement procedures for Corporate Records Management staff to evaluate information system compliance with records management requirements.

Finding 3. Disposition of Corporate Records Needs Improvement

While CM has instituted some controls over its disposition process, internal control challenges exist in the disposition of NARA's corporate records. We found eligible analog records past due for accessioning, challenges in applying retention on electronic mail records, and opportunities for improvement in the process. The challenges occurred because of insufficient procedures and insufficient management oversight. NARA Directive 101 Part 2 states CM coordinates records disposition activities including transfer of permanent operational records into the holdings of the National Archives and the destruction of operational records stored in all Federal records centers. These challenges may result in records eligible for disposition continuing to become past due, and additional storage costs to NARA.

Permanent Analog Transfers

We found CM's process to accession eligible analog permanent records was piecemeal, lacking guidance, and was not documented in procedures. The process also experienced communication breakdowns by relying upon a single staff member to understand the process and coordinate responses. CM has improved communication in the process, is working on automating the process, and drafting procedures. In FY2020, CM staff identified 56 transfers past due for accessioning and worked to investigate and take action on each of the transfers. Some transfers were found to be duplicate entries in the Electronic Records Archive[2] and thereby not past due. For the other transfers identified, each transfer had been past due by at least one Annual Move[3] cycle without an action being taken to accession the transfer or extend the disposition date. After the identification and investigation of the past due transfers, CM staff expected actions to be taken on all past due transfers by 2022.

Electronic Mail Disposition

As of the end of FY2021, CM had not implemented retention on NARA's temporary emails. CM is challenged as some staff may store program files with longer retention dates in email which should instead be stored in appropriate file drives. CM is working to implement utility within the email system to allow agency staff to better manage their files. CM had not finalized instructions to staff to fully prepare the agency for deletion of temporary emails. Retaining temporary emails past their disposition date could increase storage costs, as well as Freedom of Information Act and discovery costs.

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[2] The Electronic Records Archive is NARA's system to take in and store electronic records from across the government, allow the electronic submission of records schedules for approval by the Archivist, and manage the transfer of all permanent records.

[3] NARA's Annual Move is a transfer of permanent records from temporary storage in a Federal Records Center to the physical and legal custody of NARA.

Analog Disposal

CM has developed an effective process to manage disposal of its analog records. The process led to timely concurrence from program offices on records eligible for disposal. However, CM did not document the process in procedures. One staff member developed the process and was knowledgeable about the process. Without documented procedures, CM is at risk of decreased process effectiveness should the staff member familiar with the process depart the agency. While the process in place is effective, CM does not use the Federal Records Center Program's (FRCP) Archives and Records Centers Information System (ARCIS) disposal module. CM receives a spreadsheet of ARCIS holdings from the FRCP and uses the information to enact its disposal processes for transfers eligible for disposal in the upcoming disposal cycle. Using the ARCIS disposal module allows agencies to transact fully electronically and is a best practice.

Recommendations

We recommend the Director, Corporate Records Management:

> **Recommendation 9:**   Develop and implement standard operating procedures for disposition of agency corporate records.

> **Recommendation 10:** Develop a plan with timelines to delete temporary emails.

> **Recommendation 11:** Incorporate use of the Archives and Records Centers Information System disposal module in Corporate Records Management's disposal processes.

Finding 4.   NARA's Records and Information Management Network Needs Improvement

NARA's RIM Network needs improvement. We found CM is not sufficiently sharing records management information across the agency, records requirements have not been met in all program offices, and CM is not exercising sufficient oversight of each program office's records management. The condition is caused by CM not establishing and implementing sufficient controls, and staff not complying with parts of NARA Directive 860 and NARA Interim Guidance 861-1. NARA Directive 101 Part 2 states CM's Director ensures that recordkeeping requirements are implemented throughout the lifecycle of NARA's records and information using a network of RIM officers assigned within each program area. The Government Accountability Office's *Standards for Internal Control in the Federal Government* states management communicates quality information down and across reporting lines to enable personnel to perform key roles in achieving objectives, addressing risks, and supporting the internal control system. As a result, program office staff may not adhere to current records management guidance to create, identify, and manage records, and gaps in program office compliance may not be detected.

The RIM Network audience is comprised of IMOs, RCs, and other applicable staff. CM keeps a tracking spreadsheet of all RIM Network participants. In August 2021, we found 66 vacant positions out of 271 IMOs and RCs in the RIM Network. NARA Directive 860 tasks office executives with the appointment of IMOs and RCs. CM's Director stated CM did not have the bandwidth to follow up on each vacancy and instead wanted to transition to communicating with newly-established office records liaisons who would be responsible for filling vacancies and communicating within the program office. These office records liaisons would be situated at an appropriate level in the program office to effectively drive records management change. With vacancies in the current structure, there is risk of critical records management information not being effectively communicated throughout the agency.

NARA Directive 860, its supplement, and NARA Interim Guidance 861-1 detail the responsibilities of IMOs. We found at least two responsibilities IMOs did not meet. First, NARA Directive 860 requires IMOs to perform at least an annual evaluation of records management practices in their organization. CM was unaware if any of these evaluations occurred, and did not provide guidance to IMOs on conducting these evaluations. Second, NARA Interim Guidance 861-1 requires IMOs to notify CM of any changes involving Capstone officials. The CM staff member responsible for managing Capstone emails stated they had never been notified by an IMO of personnel changes and instead relied upon NARA Notice documents to track Capstone official changes.

CM issues various records tips throughout the year to provide NARA staff with guidance and useful information about records management requirements and responsibilities. These tips are

distributed via email to those staff in the RIM Network. CM encourages recipients to provide the information to other staff. However, there is no assurance the information is provided down the communication chain.

<u>Recommendations</u>

We recommend the Director, Corporate Records Management:

Recommendation 12: Implement procedures to ensure Records and Information Management Network office records liaison roles are filled timely.

Recommendation 13: Develop and implement procedures for annual evaluations of program office records management.

Recommendation 14: Provide annual training to Information Management Officers on their roles and responsibilities.

Recommendation 15: Identify additional methods for communicating records management information throughout the agency.

Finding 5.   Records Management Guidance Needs Improvement

CM directives are not up to date, new records management responsibilities have not been incorporated into NARA Directives, and internal procedures have not been finalized. The condition occurred because NARA did not prioritize updating policies when records management guidance or responsibilities changed. The Government Accountability Office's *Standards for Internal Control in the Federal Government* states management documents in policies the internal control responsibilities of the organization. NARA Directive 111, *NARA Directives*, states an interim guidance provides temporary NARA internal policy, procedures, authorities, or organizational structure, are issued when policy must be immediately conveyed, and should be incorporated into a policy directive within one year of the signature date. Additionally, all directives and interim guidance must include a paragraph with instructions for maintaining records created under these policies. NARA Directive 860, *Corporate Records Management Program*, states IMOs ensure that recordkeeping requirements are addressed in records paragraphs of NARA directives and guidance. NARA Directive 101 Part 2, *Office of the Chief Operating Officer*, states CM's Director manages NARA's vital records program. As a result, staff may incorrectly manage records based on outdated guidance.

We found:

- CM is responsible for four interim guidance directives: Interim Guidance 203-2, Records of Conferences, Symposia, Ceremonies, and Events; Interim Guidance 800-2, Authority to Approve the Transfer, Accessioning, or Disposal of NARA Records; Interim Guidance 824-1, Archives II Records Staging Area; and Interim Guidance 861-1. Each of these interim guidance directives has been in place longer than one year without being incorporated into a policy directive, as required.
- CM maintains vital records program procedures published in 2017. These procedures were updated in draft version in 2020, but have not yet been finalized.
- We judgmentally sampled 15 out of 297 NARA Directives and found 13 contained records management paragraphs, as required. One of the two NARA Directives without the required records management paragraph was published prior to issuance of NARA Directive 111. The requirements contained in the records management paragraphs were not always reflective of current practices. The records paragraphs are published based upon how the records are scheduled (or unscheduled) at the time the directive is issued. When a records schedule is revised, the directive is not updated to reflect the new records management requirements.

Recommendations

We recommend the Director, Corporate Records Management:

> **Recommendation 16:** Incorporate interim guidance into final policy directives per established guidance.

> **Recommendation 17:** Finalize procedures for the vital records program.

> **Recommendation 18:** Revise procedures to ensure current records management requirements are detailed in policies.

Appendix A – Acronyms

Acronym	Definition
ARCIS	Archives and Records Centers Information System
ARO	Agency Records Officer
C.F.R	Code of Federal Regulations
CM	Corporate Records Management
FRCP	Federal Records Centers Program
FY	Fiscal Year
IMO	Information Management Officer
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
RC	Records Custodian
RIM	Records and Information Management
RIM-G	Records and Information Management Guidance
SAORM	Senior Agency Official for Records Management
U.S.C.	United States Code

Appendix B – Management Response

NATIONAL
ARCHIVES

Date: March 29, 2022

To: Dr. Brett M. Baker, Inspector General

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

Subject: Formal Comments to OIG Discussion Draft Audit Report: *Audit of NARA's Corporate Records Management Program*

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

Agency management accepts the findings and recommendations. We acknowledge that the recommendations will help strengthen the program overall and will align with activities identified by the program to support NARA's Records and Information Management Strategic Plan. This plan lays out the vision, goals, objectives and strategies for a compliant and sustainable records and information management program that aligns with NARA's use of information technology to conduct business. We will provide you with an Action Plan of our proposed corrective actions.

DAVID S. FERRIERO

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Appendix C – Report Distribution List

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