



OFFICE *of*
INSPECTOR GENERAL
NATIONAL ARCHIVES

Audit of NARA's High Value Assets


August 26, 2021

OIG Audit Report No. 21-AUD-11



August 26, 2021

TO: David Ferriero
Archivist of the United States

FROM: Dr. Brett M. Baker 
Inspector General

SUBJECT: *Audit of NARA's High Value Assets*
(OIG Audit Report No. 21-AUD-11)

Attached is the Office of Inspector General's final report of our audit of *NARA's High Value Assets*. The report contains eight recommendations to improve security and strengthen management and oversight controls over NARA's High Value Asset program. Following the August 18, 2021, exit conference, agency staff indicated that they had no comments for inclusion in this report.

Please provide planned corrective actions and expected dates to complete the actions for each of the recommendation(s) within 30 days of the date of this report. **This report is not for public release.** Consistent with our responsibility under the *Inspector General Act, as amended*, we may provide copies of our report to congressional committees with oversight responsibility over NARA.

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

cc: Debra Wall, Deputy Archivist of the United States
Micah Cheatham, Chief of Management and Administration
William Bosanko, Chief Operating Officer
Swarnali Haldar, Chief Information Officer
Jay Trainer, Executive for Agency Services
Sheena Burrell, Deputy Chief Information Officer
Scott Levins, Director, National Personnel Records Center
Gordon Everett, Director, Federal Records Center Program
Oliver Potts, Director, Office of the Federal Register
Kimm Richards, Accountability
Jewel Butler, Assistant Inspector General for Audits
Kimberly Boykin, Audit Director
Andrew Clements, Senior IT Auditor
United States House Committee on Oversight and Government Reform
Senate Homeland Security and Governmental Affairs Committee

Due to the sensitive nature of the content of this report, public release of the entire report may put systems at additional risk. The following is information on the report and NARA management's response to the report.

Executive Summary

Audit of NARA's High Value Assets

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Why Did We Conduct This Audit?

Threats to federal government information systems come from a variety of sources including insiders and nation states. As a result, the federal government has put renewed emphasis on improving the overall security of information systems including High Value Asset (HVA) systems. This is true for the National Archives and Records Administration (NARA) where it self-identified [REDACTED]

[REDACTED] as HVAs.

The Office of Inspector General (OIG) performed this audit to determine whether NARA has controls in place to adequately protect its HVAs.

What Did We Recommend?

We made eight recommendations to improve security and strengthen management and oversight controls over NARA's High Value Asset program. Management concurred with the recommendations in this report.

What Did We Find?

NARA did not fully implement the requirements in Office of Management and Budget (OMB) Memorandum 19-03, *Strengthening the Cybersecurity of Federal Agencies by enhancing the High Value Asset Program*. Specifically, NARA did not: (1) develop a process for designating NARA systems as HVAs; (2) evaluate all of its systems based on the most recent definition of an HVA; and (3) update the System Development Lifecycle (SDLC) methodology to incorporate National Institute of Standards and Technology (NIST) Special Publication (SP) 800-160 Volume 1 as required by OMB Memorandum 19-03. This occurred because NARA did not make it a priority to fully implement OMB Memorandum 19-03. As a result, NARA is vulnerable to unmitigated risks that may threaten NARA's HVA information systems and electronic data.

NARA's security documentation was outdated and did not reflect the current security environment of [REDACTED]. Specifically, NARA did not: [REDACTED]

[REDACTED]. This occurred because NARA has not provided the necessary oversight to ensure up to date, complete, and accurate security documentation. NIST SP 800-137, *Information System Continuous Monitoring for Federal Information Systems and Organizations*, states timely, relevant, and accurate information is vital, particularly when resources are limited and agencies must prioritize their efforts. Without up to date and accurate security documentation, NARA Security Officials may not have the most current security status of the HVAs in order to make informed decisions about the security of the information systems, thus putting the systems and the agency at risk.

Further, NARA did not establish a system specific alternate processing site for [REDACTED]. This occurred because NARA has not made it a priority to establish a system specific alternate processing site for [REDACTED]. NIST 800-53 revision 4 requires moderate level systems to establish alternate processing sites that are geographically distinct from primary processing sites. Without a system specific alternate processing site, it would be unlikely for NARA to meet the maximum tolerable downtime (MTD) objective and bring these systems up in the required timeframe to ensure minimal disruption to NARA operations should a disaster occur.

Appendix C – Agency Comments

An exit conference was held with the agency on August 18, 2021. Prior to this meeting, agency management reviewed a discussion draft and provided comments that have been incorporated into this report, as appropriate. Agency management stated their general agreement with the findings and recommendations and opted not to provide formal comments for inclusion in this report.

Appendix D – Discussion Draft Report Distribution List

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Fax	301-837-3197
Mail	IG Hotline NARA P.O. Box 1821 Hyattsville, MD 20788-0821