September 30, 2024

TO: Dr. Colleen Shogan
             Archivist of the United States

FROM: Dr. Brett M. Baker
             Inspector General

SUBJECT: *Audit of NARA's Office of the Chief Records Officer Records Management Oversight and Reporting*
             OIG Audit Report No. 24-AUD-08

The Office of Inspector General (OIG) contracted with Sikich CPA LLC (Sikich) to conduct an independent performance audit of NARA's Office of the Chief Records Officer Records Management Oversight and Reporting (ACO). Attached is Sikich's report titled Performance Audit of NARA's Office of the Chief Records Officer Records Management Oversight and Reporting. The objectives of this audit were to determine whether ACO inspections are effective and whether ACO produces a reliable and complete understanding of the inspected entity's records management practices. The report contains five recommendations to strengthen NARA's inspection processes. Agency staff indicated they had no comments for inclusion in this report.

Sikich is responsible for the attached auditor's report dated September 27, 2024 and the conclusions expressed in the report. The findings and conclusions presented in the report are the responsibility of Sikich. The OIG's responsibility is to provide adequate oversight of the contractor's work in accordance with Generally Accepted Government Audit Standards.

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 published report. Consistent with our responsibility under the Inspector General Act of 1978, as amended, we may provide copies of our report to congressional committees oversight responsibility over NARA. We appreciate the cooperation and assistance NARA extended to us during this audit. Please contact me with any questions.

Cc:

William. J. Bosanko, Deputy Archivist of the United States
Merrily Harris, Executive Secretariat
Jay Trainer, Acting Chief Operating Officer

Colleen Murphy, Acting Chief of Management and Administration
Meghan Guthorn, Deputy Chief Operating Officer
William Fischer, Acting Chief Records Officer
Kevin Pratt, Chief of Staff, Agency Services
Donald Rosen, Director, Records Management Oversight and Reporting
Kimm Richards, Accountability
William Brown, Senior Program Auditor
Parker Skaats, Senior Program Auditor
United States Senate Homeland Security and Governmental Affairs Committee
United States House of Representatives Committee on Oversight and Reform

SIKICH

RECORDS MANAGEMENT OVERSIGHT AND REPORTING PERFORMANCE AUDIT

SUBMITTED TO
NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

PERFORMANCE AUDIT OF NARA'S
OFFICE OF THE CHIEF RECORDS OFFICER
RECORDS MANAGEMENT OVERSIGHT AND REPORTING

SEPTEMBER 27, 2024

ACCOUNTING   TECHNOLOGY   ADVISORY

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SIKICH.COM

September 27, 2024

Dr. Brett Baker
Inspector General
Office of Inspector General
National Archives and Records Administration

Subject: Performance Audit of Records Management Oversight and Reporting

Dear Dr. Baker,

Sikich CPA LLC (Sikich)[1] is pleased to submit the attached report detailing the results of our performance audit of the Office of the Chief Records Officer's Records Management Oversight and Reporting Unit (ACO), conducted under contract number 8831032A00012. The objectives of this audit were to determine whether ACO inspections are effective and whether ACO produces a reliable and complete understanding of the inspected entity's records management practices. To address these objectives, we reviewed inspection reports and associated information for inspections that ACO conducted from October 1, 2019, through September 30, 2023 (fiscal years 2020 through 2023.)

We conducted the audit fieldwork in Alexandria, Virginia, from November 13, 2023, through June 2, 2024. We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards,* as issued by the Comptroller General of the United States (2018 Revision). 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.

We thank ACO staff within the Office of the Chief Records Officer for the cooperation and assistance provided to us during the course of this audit.

Sincerely,

Sikich CPA LLC

September 27, 2024

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[1] Effective December 14, 2023, we amended our legal name from "Cotton & Company Assurance and Advisory, LLC" to "Sikich CPA LLC" (herein referred to as "Sikich"). Effective January 1, 2024, we acquired CliftonLarsonAllen's (CLA's) federal practice, including its work for the National Archives and Records Administration.

EXECUTIVE SUMMARY

The National Archives and Records Administration (NARA) engaged Sikich CPA LLC (Sikich)[2] to conduct a performance audit of the Office of the Chief Records Officer's Records Management Oversight and Reporting Unit (ACO).

PERFORMANCE AUDIT OF RECORDS MANAGEMENT OVERSIGHT AND REPORTING

Why Did We Conduct This Audit?	What Did We Find?
ACO is responsible for monitoring federal agencies' compliance with NARA's records management regulations, policies, guidance, and best practices. The audit's objectives were to determine whether ACO's inspections are effective and whether ACO produces a reliable and complete understanding of the inspected entity's records management practices. To address these objectives, we reviewed relevant policies, procedures, guidance, and other internal control documentation related to ACO inspections undertaken from October 1, 2019, through September 30, 2023 (fiscal years 2020 through 2023). We also reviewed relevant program data for the same time period. We selected a judgmental sample of 6 of the 18 inspections in our scope as case studies. We also interviewed relevant ACO management and inspection team members.	ACO has opportunities to improve its inspection selection process, the documentation supporting the analyses that it performs as part of its inspections, and its program management information system. First, we found that ACO did not always select agencies for inspection based on required criteria. More than half of the inspection plans and reports we reviewed did not cite any required criteria as the justification for why ACO selected an agency for inspection. This issue occurred because ACO's inspection selection process does not formally incorporate required selection criteria. Second, we found that ACO did not sufficiently document the analyses supporting its findings and recommendations for our sample of six inspections. This issue occurred because ACO's current standard operating procedures do not include explicit documentation requirements for performing analyses, and ACO does not have documentation templates available. Third, we found that the program management information system ACO relies on for monitoring the effectiveness of its oversight projects was incomplete. Specifically, ACO had not entered information for 5 projects reflecting oversight at 28 agencies. ACO management stated that the team has not been consistently entering data into the Compliance Achievement Reporting System (CARS) because the system relies on outdated software, it is difficult to use and not part of teams' daily workflow. ACO management noted that they were aware of the need for a new program management information system and have begun market research.
What Did We Recommend? We made five recommendations to strengthen ACO's inspection processes.	By developing a formal selection process that incorporates required criteria, requiring inspection teams to maintain documentation supporting their analyses, and integrating data entry into teams' workflow, ACO will be better able to effectively carry out its records management oversight responsibilities.

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[2] Effective December 14, 2023, we amended our legal name from "Cotton & Company Assurance and Advisory, LLC" to "Sikich CPA LLC" (herein referred to as "Sikich"). Effective January 1, 2024, we acquired CliftonLarsonAllen's (CLA's) federal practice, including its work for the National Archives and Records Administration.

SUMMARY OF RECOMMENDATIONS

Number	Recommendation	Responsible Office
1	Develop a formal work planning process that incorporates the selection criteria from the Handbook and requires that ACO teams clearly document the criteria used to select each agency in the inspection plans and reports.	Office of the Chief Records Officer
2	Revise Standard Operating Procedure 2.2, section 12, to explicitly require the inspection teams to document the analyses they conduct to support their findings and recommendations.	Office of the Chief Records Officer
3	Develop a standard documentation template that ACO staff can use to clearly document the deficiencies identified during an inspection.	Office of the Chief Records Officer
4	Migrate the existing program data from CARS to a supported in-house tool to better manage the data while the team completes the market research for a new program management information system.	Office of the Chief Records Officer
5	Develop relevant internal controls (policies, procedures, and/or guidance) to ensure data entry is integrated into ACO's daily workflow.	Office of the Chief Records Officer

BACKGROUND

The Records Management Oversight and Reporting Unit (ACO) within the Office of the Chief Records Officer is responsible for monitoring federal agencies' compliance with the National Archives and Records Administration's (NARA's) records management regulations, policies, guidance, and best practices.[3] ACO's stated mission is to support a digital government by conducting oversight and reporting of federal records management (RM) programs that are timely, objective, fact-based, fair, and balanced. According to the Records Management Oversight and Reporting Handbook (the Handbook), ACO's goal is to enable confidence in the integrity, authenticity, and reliability of federal records so that the records and information of the United States Government are created and preserved for access now and in the future in accordance with statutes, regulations, policies, and guidance.

ACO comprises two Oversight Teams and the Systems Analysis Team. These teams carry out ACO's mission by developing, planning, and conducting inspections, reviews, assessments, surveys, and studies of agency records, recordkeeping systems, and RM programs.[4] The overall purpose of these activities is to ensure that agencies create, identify, maintain, and preserve records for as long as required by the Federal Records Act (FRA) (44 U.S.C. 31). Table 1 provides an overview of each type of oversight report that ACO produces.

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[3] ACO provides oversight for agencies subject to the Federal Records Act (44 U.S.C. 31).

[4] ACO also monitors federal RM programs through three required annual reports that federal agencies must submit. ACO consolidates these management reports into the Annual Federal Agency Records Management Report. Additionally, ACO investigates and tracks reports of unauthorized disposition, which is defined as the unlawful or accidental removal, defacing, alteration, or destruction of a scheduled or unscheduled federal record. These activities are outside the scope of this audit.

Table 1. Types of ACO Oversight Reports

Type	Definition
Inspection[5]	An inspection is a formal review and report of agency recordkeeping practices that focuses on significant records management problems affecting records at risk. The primary goal of the inspections that ACO conducts is to identify risks to the records management systems (RMS) and help agencies implement high-quality RMS by providing actionable recommendations.
	● *Single Agency Inspection (SAI):* An inspection of a single agency's RMS. SAIs usually provide a comprehensive review of the RMS.
	● *Multi-Agency Inspection (MAI):* A single inspection involving multiple agencies that have some characteristics in common. An MAI may focus on particular aspects of the RMS at each agency rather than on the entire RMS.
	● *Inspection Series:* ACO may conduct several SAIs focused on a type of agency or a specific aspect of RMS, followed by a summary report.
Review	Reviews are a systematic, less formal method (than agency inspections) used to measure a specific agency's RM program compliance with federal statutes and regulations, and to determine the effectiveness of agency RM policies and procedures.
Assessment	An assessment is an evaluation of a specific RM topic, issue, or event affecting RM processes, procedures, or policies.
Studies and Surveys	ACO periodically conducts studies or surveys of specific records and information management topics based on data collected from Annual Federal Agency Records Management Reporting, inspection and review findings, and additional information from other resources.

One of ACO's primary performance goals is to interact with 10 percent of the agencies subject to the FRA each year through one of the compliance activities listed in Table 1. Although we identified opportunities to improve ACO's management of data associated with its oversight activities, as discussed in Finding 3, we confirmed that ACO met this goal in each of the 4 years within our scope. Figure 1 shows how many agencies ACO interacted with in each of the 4 years within our scope.

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[5] According to 44 United States Code (U.S.C.), Chapter 2901, inspections are a means for reviewing any federal agency's records or records management practices or programs with respect to their effectiveness and compliance with records management laws, as well as making necessary recommendations for correction or improvement. Inspections are a formal process prescribed by 36 Code of Federal Regulations (CFR) 1239.20. Conducting inspections is one of ACO's major functions and is supplemented by other oversight and reporting activities.

Figure 1. Number of Agencies ACO Interacted with From FY 2020 Through FY 2023
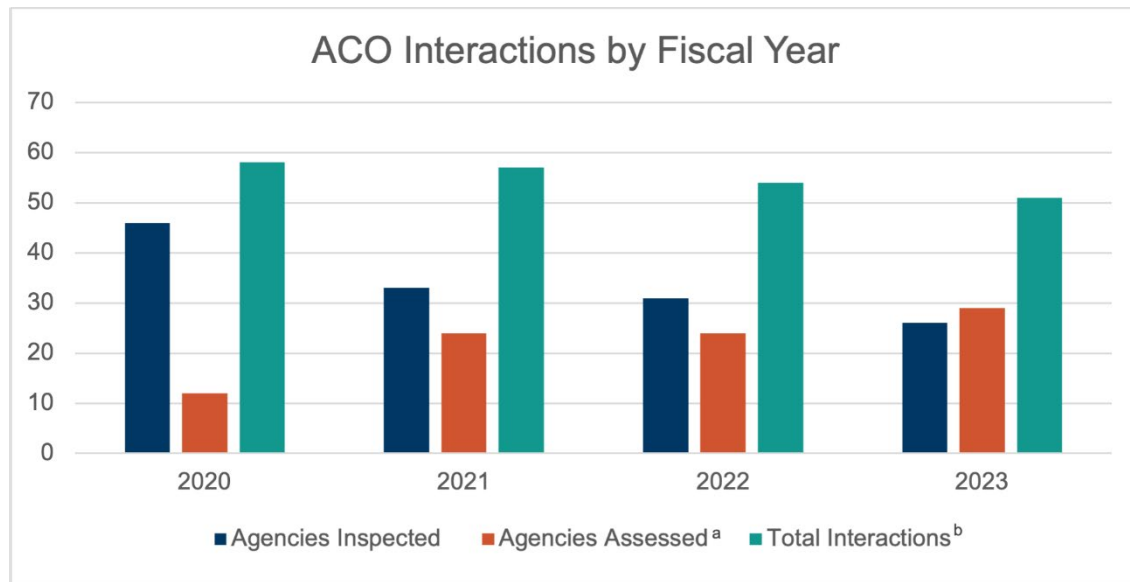
^a ACO performed four systems assessments during the timeframe included in our audit scope. We have grouped these assessments together in the assessment category.

^b Agencies may be subject to both an inspection and assessment during the same year. The data on the chart includes completed an ongoing assessment for each year but does not count duplicates within a given category. As a result, the total number of agencies that ACO interacted with in a given year may not equal the sum of the number of agencies subject to inspections and assessments. In addition, one inspection or assessment may include more than 10 agencies.

The scope of this audit was limited to inspections that ACO performed from October 1, 2019, through September 30, 2023 (fiscal years [FYs] 2020 through 2023). Our scope included 18 inspections, 9 of which were SAIs and 9 of which were MAIs. Of the 18 inspections, 11 were part of a series of inspections.

AUDIT RESULTS

Finding 1: ACO Needs to Strengthen Its Inspection Selection Process

ACO did not always select agencies for inspection based on the criteria required per the Handbook. We found that more than half of the inspection plans and reports we reviewed did not cite any of the required selection criteria. Instead, ACO selected agencies for inspection during annual planning meetings and did not formally consider the selection criteria required by the Handbook. Developing a work planning process that incorporates the required criteria will better position ACO to effectively carry out its record management oversight responsibilities.

The Oversight Selection Criteria section of the Handbook requires ACO to select agencies for inspection based on criteria such as holding high-value permanent records, failing to transfer records according to schedule, or having findings from Inspector General or Government Accountability Office (GAO) audits.[6] Further, the Handbook and related standard operating procedures (SOPs) require ACO teams to use inspection plan and report templates. Both

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[6] We identified more than 20 criteria that ACO could reference as justification for agency selection.

templates include sections that require ACO to document the criteria used to justify the selection of the inspected agency or agencies.

We reviewed all of the inspection plans and reports included in the scope of this audit[7] to determine whether the selection criteria referenced in the inspection plans and reports aligned with the required selection criteria in the Handbook. We found that 9 of the 17 inspection plans[8] did not cite any of the Handbook selection criteria. Similarly,13 of the 18 inspection reports did not cite any of the Handbook selection criteria as a justification for why ACO was inspecting the agency or agencies.

ACO selects agencies for inspection during its annual planning meetings. These planning meetings involve all ACO staff and are designed to identify the teams' inspections and projects for the upcoming year. According to ACO officials, during the annual planning meeting, ACO team members propose projects they would like to conduct based on agency, topic, type of review (assessment versus inspection), and other ideas. In addition to these suggestions, ACO management reported that they review historical data on ACO oversight activities so they can take into account whether ACO has recently reviewed an agency. ACO management stated that this helps ensure they are able to provide oversight of as many agencies as possible, despite limited resources.

However, these planning meetings do not follow a formal selection process based on the selection criteria required per the Handbook. Further, the work plans created during the annual planning meetings do not provide justification for why ACO selected certain agencies or projects. By developing a work planning process that ensures it selects agencies for inspection based on the required Handbook criteria, ACO will be able to more effectively carry out its record management oversight responsibilities.

We recommend that the Chief Records Officer:

> *Recommendation 1:* Develop a formal work planning process that incorporates the selection criteria from the Handbook and requires that ACO teams clearly document the criteria used to select each agency in the inspection plans and reports.

Finding 2: ACO Has an Opportunity to Improve Its Inspection Analysis Documentation

We found that ACO did not sufficiently document the analyses supporting its findings and recommendations in a judgmental sample of 6 of the 18 agency inspections included in the scope of this audit.[9] Specifically, the documentation in the inspection files for all six inspections we reviewed was not sufficient to enable us to understand how the evidence obtained led to the inspection teams' judgments and conclusions. This is because, although ACO procedures require teams to conduct analyses as part of each inspection, there are no associated documentation requirements or guidance documents. Improving inspection analysis documentation will enable ACO management to better ensure that inspection findings and recommendations are reliable and are adequately supported.

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[7] The scope of our review was FY 2020 through FY 2023. We reviewed all 18 inspections that ACO performed during this 4-year period.

[8] One of the inspections, the Farm Credit Administration, did not have an inspection plan.

[9] For more detail on how we selected the sample of six inspections, see Appendix A.

ACO's SOP for Inspections of Federal Agency Records Management Programs (SOP 2.2) provides instructions for conducting inspections of federal agency RM programs. SOP 2.2 requires ACO to conduct an analysis as part of each inspection. This includes requiring team members to:

1) Review and discuss notes, ideas for findings and recommendations, and relevant background material.

2) Develop a consensus as to the main results of inspection site visits and concepts for the report.

3) Identify principal findings and recommendations.

However, four of the six inspections we reviewed did not have sufficient documentation to support the analysis the team conducted to reach its findings. Specifically, the inspection files did not include documentation that supported team member review, discussion, or consensus about the results beyond the information captured in the draft inspection reports. Further, although the other two inspections we reviewed did include some documentation related to the analysis performed, this documentation contained very limited detail. For example, after completing its file review and interviews, one inspection team created a document that listed the preliminary findings, with the relevant category, notes, and regulation citations. However, this document did not explain what analysis the team performed or information the team relied upon to identify the preliminary findings. It was also not clear how the team ultimately developed these preliminary findings into the final results and recommendations in the inspection.

According to SOP 2.2 and the Handbook, ACO developed its inspection process to align with GAO's 2018 *Generally Accepted Government Auditing Standards* (GAGAS) and 2014 *Standards for Internal Control in the Federal Government* (the Green Book).[10] These standards highlight the importance of sufficient documentation. In particular, GAGAS states:

> *Auditors should prepare audit documentation in sufficient detail to enable an experienced auditor, having no previous connection to the audit, to understand from the audit documentation the nature, timing, extent, and results of audit procedures performed; the evidence obtained; and its source and the conclusions reached, including evidence that supports the auditors' significant judgments and conclusions.*

The documentation in the inspection files for the six inspections we reviewed was not sufficient to enable us to understand how the evidence obtained led to the inspection teams' judgments and conclusions. This is because SOP 2.2 does not include explicit documentation requirements in the analysis section, and ACO has not developed templates to assist the inspection teams in documenting their analyses. By requiring documentation to support the inspection teams' analyses, ACO management can better ensure that inspection findings and recommendations are reliable and adequately supported.

We recommend that the Chief Records Officer:

> **Recommendation 2:** Revise SOP 2.2, section 12, to explicitly require the inspection teams to document the analyses they conduct to support their findings and recommendations.

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[10] GAO, *Government Auditing Standards,* GAO-18-568G (Washington, D.C.: July 2018); and *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

Recommendation 3: Develop a standard documentation template that ACO staff can use to clearly document the deficiencies identified during an inspection.

Finding 3: ACO Has an Opportunity to Improve Its Program Management Information System

The Office of the Chief Records Officer has the opportunity to improve its primary internal control for monitoring the effectiveness of the ACO program. Specifically, we found that the Compliance Achievement Reporting System (CARS) contained incomplete information related to ACO records management oversight projects conducted in 2023. This issue occurred because CARS relies on outdated database software, is difficult to use, and is not part of ACO's daily workflow. Without an effective program management information system, ACO management faces potential challenges in accessing the information needed to achieve the program's oversight objectives.

CARS is a database that ACO staff use to track information related to records management oversight projects and their associated recommendations.[11] ACO is also supposed to be able to use the information from CARS to support key internal and external management reports, such as ACO Monthly Project Updates, the Semi-Annual Oversight Activity Report, and NARA's Annual Performance Report. As designed, CARS aligns with GAO's Green Book, Principle 16, which requires management to monitor its internal control system and evaluate results.[12]

However, we analyzed CARS data as of November 2023 (first quarter of FY 2024) and found that it contained incomplete information regarding ACO's records management oversight for projects included on the FY 2023 workplan. Specifically, ACO staff had not created CARS entries for 5 projects reflecting interactions with 28 agencies. ACO staff had entered the names of two other projects in CARS; however, these entries did not contain any other basic project information, such as the project start date. According to ACO management, the team has not been consistently entering data into CARS because the system relies on outdated database software, is difficult to use, and is not part of ACO's daily workflow. Further, the ACO Team Lead, who had primary responsibility for creating, managing, and updating CARS, retired at the end of 2023.

In accordance with Green Book requirements,[13] the CARS Users' Guide provides clear direction for how and when personnel should enter oversight project data into the system, based on the project specifics. However, even when ACO staff used CARS more consistently, it is a stand-alone information-tracking system that was not designed to enable staff to carry out day-to-day inspection tasks. Instead, individual staff maintain their own records related to project management, which they manually input into CARS later. Further, the internal controls around CARS do not include quality control checks to ensure the system produces quality data.[14]

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[11] Assessments do not include recommendations and therefore data about assessments is entered only when agencies are selected.

[12] GAO-14-704G.

[13] GAO-14-704G, Principle 12, states that management should implement control activities through policies.

[14] GAO-14-704G, Principle 13, states that management should use quality information to achieve the entity's objectives. It further defines quality information as information that is appropriate, current, complete, accurate, accessible, and provided on a timely basis.

Without an effective program management information system that is integrated into the daily workflow of the ACO team and guided by clear policies and procedures, ACO management faces potential challenges in accessing the information needed to achieve the program's oversight objectives. ACO management has recognized that the lack of quality program management information limits ACO's ability to effectively carry out its oversight responsibilities and has begun market research on program management software that is more suited to ACO's needs. According to ACO management, as of July 2024, ACO is conducting market research on potential system options.

We recommend that the Chief Records Officer:

Recommendation 4: Migrate the existing program data from CARS to a supported in-house tool to better manage the data while the team completes the market research for a new program management information system.

Recommendation 5: Develop relevant internal controls (policies, procedures, and/or guidance) to ensure data entry is integrated into ACO's daily workflow.

APPENDIX A: OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objectives of this audit were to determine whether the Records Management Oversight and Reporting Unit's (ACO's) inspections were effective and whether ACO produces a reliable and complete understanding of the inspected entity's records management practices.

Scope

The scope of this audit was limited to ACO inspection reports and associated information for inspections that ACO conducted from October 1, 2019, through September 30, 2023 (fiscal years 2020 through 2023).

Methodology

To address the audit objectives, we reviewed relevant policies, procedures, guidance, and other internal control documentation related to ACO. In particular, we reviewed the Records Management Oversight and Reporting Handbook (the Handbook) and the standard operating procedures for inspections. We also reviewed inspection plans, inspection reports, and prior audit reports that were relevant to the ACO inspection process. Additionally, we interviewed relevant officials about ACO's oversight activities and processes.

To further understand ACO's oversight activities, we obtained a copy of its Compliance Achievement Reporting System (CARS) database and the associated User's Guide. Our initial review of the CARS data focused on the completeness and logical consistency of the data captured for inspection recommendations. We found that the CARS data were reliable for the purpose of identifying the number of recommendations associated with the 18 inspections included in the scope of the audit. However, we later determined that the CARS data were incomplete with regard to non-inspection activities and that the data cannot be relied upon for other purposes, as discussed in the Audit Results section of this report.

To determine how ACO selects agencies for inspection, which is key to the effectiveness of ACO's oversight, we identified the selection criteria required per the Handbook. We then assessed the inspection plan and inspection report for each of the 18 inspections included in the scope of this audit.[15] These inspections reflected interactions with 78 federal agencies. We reviewed each inspection plan and inspection report and identified any justifications as to why ACO had selected the agency or agencies for inspection. We then compared those justifications to the required Handbook criteria. We also reviewed annual workplan documents to determine whether they captured other information about the selection criteria and interviewed relevant ACO officials to gain additional insight into the selections process.

To determine whether ACO oversight produces a reliable and complete understanding of the inspected entity's records management practices, we selected a judgmental sample of 6 of the 18 inspections included in the scope of our review and conducted in-depth reviews of the inspection process and related documentation for these 6 samples. To select the 6 case study inspections, we compiled data on the characteristics of all 18 inspections included in the scope of the audit and considered the following:

- Whether the inspection was a single-agency or multi-agency inspection

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[15] One of the inspections, the Farm Credit Administration, did not have an inspection plan.

- The fiscal year in which ACO published the inspection

- Whether the inspection was part of a series

- The total number of findings and recommendations

We selected a sample of six inspections that represented a broad cross-section of the various characteristics, as shown in Table 2.

Table 2. Characteristics of Inspections Selected for Further Review

Title	Fiscal Year	Type	Number of Agencies	Part of Series
Department of the Navy Records Management Program	2023	Single-Agency Inspection	1	Yes
Permanent Records of Selected Agencies of the Department of Agriculture	2022	Multi-Agency Inspection	8	Yes
Farm Credit Administration Records Management Program	2022	Single-Agency Inspection	1	No
Boards, Commissions, and Foundations Multi-Agency Inspection	2021	Multi-Agency Inspection	5	Yes
Records Management Program of the Department of State	2020	Single-Agency Inspection	1	No
Management of Disaster Response and Recovery Records	2020	Multi-Agency Inspection	7	No

For each of the six inspections selected, we reviewed the workpaper files; identified and reviewed key documents, such as inspection team notes; and requested documentation to support the analyses the inspection teams conducted to determine findings and recommendations for the reports. For each recommendation, we reviewed the process the inspection teams followed to obtain the relevant agency's plan of corrective actions, as well as the inspection team's efforts to obtain status updates every six months. When ACO had agreed to close a recommendation, we reviewed the supporting documentation the team used to justify the closure. In addition, to further understand the process the inspection team followed to reach their conclusions, we met with five of the six inspection teams and had them walk through the inspection files from start to finish.

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 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 objectives.[16]

- Control Environment: (3) Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.

- Risk Assessment: (6) Management should define objectives clearly to enable the identification of risks and define risk tolerances.

- Control Activities: (12) Management should implement control activities through policies.

- Information & Communication: Management should (13) use quality information to achieve the entity's objectives; and (15) externally communicate the necessary quality information to achieve the entity's objectives.

- Monitoring: (16) Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

We assessed the design, implementation, and/or operating effectiveness of these internal controls and identified deficiencies that we believe could affect NARA's ability to effectively carry out its inspections and oversight responsibilities. We discuss the internal control deficiencies we found 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.

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[16] *Standards for Internal Control in the Federal Government,* GAO-14-704G.

APPENDIX B: MANAGEMENT RESPONSE

Agency management stated their general agreement with the findings and recommendations and opted not to provide formal comments for inclusion in this report.

APPENDIX C: ACRONYMS

Acronym	Meaning
ACO	Records Management Oversight and Reporting Program
CARS	Compliance Achievement Reporting System
CRO	Chief Records Officer
FRA	Federal Records Act
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
GAO	Government Accountability Office
MAI	Multi-Agency Inspection
NARA	National Archives and Records Administration
OIG	Office of the Inspector General
RM	Records Management
RMS	Records Management System
SAI	Single Agency Inspection
SOP	Standard Operating Procedure
U.S.C	United States Code

APPENDIX D: REPORT DISTRIBUTION LIST

Archivist of the United States

Deputy Archivist of the United States

Executive Secretariat

Acting Chief Operating Officer

Deputy Chief Operating Officer

Acting Chief Records Officer

Acting Chief of Management and Administration

Chief of Staff, Agency Services

Director of Records Management Oversight and Reporting

Accountability

United States Senate Homeland Security and Governmental Affairs Committee

United States House of Representatives Committee on Oversight and Accountability

APPENDIX E: OIG HOTLINE CONTACT INFORMATION

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 an online referral form. Walk-ins are always welcome. Visit https://naraoig.oversight.gov/ for more information, or contact us:

Contact the OIG Hotline
Online Complaint Form

Contact the OIG by telephone and FAX
Hotline Telephone: 301-837-3500 (local) or 1-800-786-2551 (toll-free)
FAX: 301-837-3197

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 Contractor Reporting Form.