Audit of Processing of Textual Records

OIG Audit Report No. 13-14

September 18, 2013

Table of Contents

Executive Summary

The National Archives and Records Administration (NARA) Office of Inspector General (OIG) performed an audit of NARA's processing of textual records. We assessed the process of making archival records available to the public and determined whether processing of textual records continues to be a material weakness[1]. Processing is the means by which NARA achieves intellectual and physical control of records with the ultimate goal of properly describing them within NARA's online catalog of nationwide holdings[2].

A 2007 OIG audit (see OIG Audit Report 07-06 of February 28, 2007) of processing revealed NARA was constrained in its ability to provide efficient and effective access to its holdings and was not adequately meeting the mission of ensuring public access to records as soon as legally possible. In fiscal year (FY) 2008 NARA developed the capability to measure processing progress for archival holdings. At that time the backlog of unprocessed records was approximately 70% of NARA's textual holdings. In FY 2010 NARA recognized textual records processing as a material weakness.

As of the end of FY 2012, NARA's processing backlog was approximately 40%. Since processing measures were put into place in 2008, NARA has considerably reduced the backlog as a percentage of total textual holdings. This was done by creating processing priorities, hiring additional resources, and implementing processing work plans. Although NARA has made significant strides in reducing the processing backlog over the last four years, additional effort is still needed to reduce the material weakness and strengthen NARA's processing program. Specifically our audit disclosed the following weaknesses.

- The strategic direction of processing needs to be adjusted to include an overall agency policy and processing definition, adequate backlog reduction plans for Research Services field locations, increased processing progress in the presidential libraries, improved processing staff utilization, and a realistic and attainable processing goal.
- The Office of Presidential Libraries lacks a performance measure for tracking the processing of electronic records.
- Inaccurate processing data has been reported in the Performance Measurement Reporting System.
- Documented processing procedures either did not exist or were outdated.

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[1] Electronic records were generally excluded from the scope of this audit. However, the Office of Presidential Libraries made us aware of a large volume of unprocessed electronic records and we performed a limited review of these records.

[2] The Archival Research Catalog (ARC) is the online catalog for NARA's nationwide holdings. ARC allows basic and advanced searching of NARA's holdings.

As a result, a processing backlog persists placing records at risk, increasing the time for reference requests, impairing the agency's ability to describe the records online, and in some cases may be limiting the access to records.

We made eight recommendations to address our findings and strengthen the NARA Processing Program.

Background

The National Archives and Records Administration's (NARA) second strategic goal is to preserve and process records to ensure access by the public as soon as legally possible[3]. Processing involves all the steps needed to open a record to the public. It includes establishing basic intellectual control, flagging records that have privacy implications or that contain classified national security information, providing enhanced descriptions of the records content as well as the context in which the records were created, and performing initial preservation so that the records may be served to the public. The final step in processing is the completion of an approved series description within NARA's online nationwide holding catalog, the Archival Research Catalog (ARC), to facilitate access to those records by researchers.

Two NARA offices have programmatic responsibility for textual processing: Research Services (R), which consists of Archives I, Archives II, and 13 locations in the field; and Legislative Archives, Presidential Libraries, and Museum Services (L).

Prior Audit
The OIG conducted an audit of textual processing in 2007 (OIG Audit Report No. 07-06, dated February 28, 2007). That audit revealed NARA was constrained in its ability to provide efficient and effective access to its holdings and was not adequately meeting the mission of ensuring public access to records as soon as legally possible. Specifically the audit disclosed: (1) NARA's budget and staffing were inadequate to meet processing needs; (2) the impact of Executive Order 12958 required staff to oversee mandatory declassification efforts and the Presidential Records Act made presidential records subject to the Freedom of Information Act (both of these regulations pulled staff away from performing systematic processing which exacerbated the backlogs in the presidential libraries); and (3) NARA lacked a mechanism for accurately tracking processing workloads and backlogs.

Processing Backlog
As of the end of FY 2012 the textual records processing backlog was approximately 40%. This backlog is attributed to an increase in accessioned records, inadequate staffing, and the detailed review required of presidential records. Since processing measures have been put into place in 2008, the backlog has declined from 70% of textual holdings to 40% as noted by the chart on the next page.

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[3] This is goal 2 as defined in NARA's Strategic Plan 2006-2016.

Backlog of Unprocessed Textual Records for all of NARA
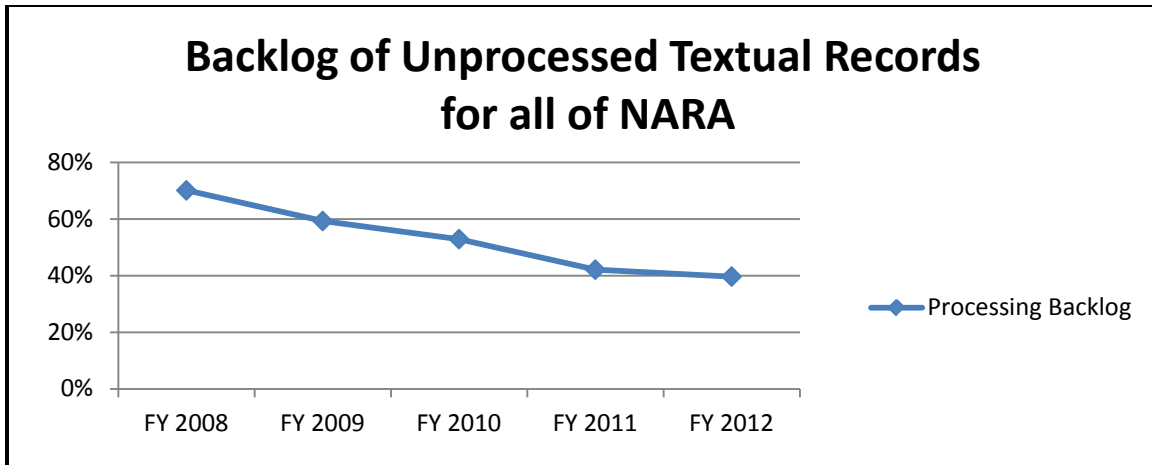
Backlog reduction efforts

Since our last audit in 2007 management put controls in place and initiated the following projects to help reduce the processing backlog.

Processing plans

In 2008 the agency developed the metric for the goal of having 95% of holdings processed by FY 2016. In response to this, the former Office of Regional Records Services required each regional archive to create a five year plan to reach the agency goal by 2013. These plans were to establish staffing assignments, priorities, and measurable milestones.

Record Description

A working group was established to examine all aspects of the description process necessary to develop a strategy for meeting the FY 2012 description goal. The recommendation was to base description on the four-level concept[4]. Although description is only one element of processing, this initiative helps make processing more efficient.

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[4] The four levels of processing were defined as :
- Preliminary Description – ARCIS and/or agency supplied information.
- Minimal Description – mandatory elements as defined by the Lifecycle Data Requirements Guide as well as an arrangement statement and a concise scope and content note if the title is not sufficient to describe the records.
- Enhanced Description – information that is not essential but is beneficial, i.e., file or container lists.
- In-Depth Research Guides – dynamic online guides that relate records with common themes or characteristics across record groups or physical locations.

Creating various levels of processing

As part of the FY 2012 material weakness action plan the following levels of processing were defined.

1) Unprocessed: All elements required to accession records, and in most instances, complete a preliminary description and preliminary evaluation of access restrictions is completed.
2) Minimally Processed: All elements required to complete a minimal series description.
3) Fully Processed: All elements required to complete a minimally or in-depth guide to the records.

Creating these various levels of processing enables NARA to process some series more efficiently in order to reduce the backlog.

Cost benefit analysis

Research Services plans to create a model showing the relationships of variables in order to calculate the cost/benefit of serving processed versus unprocessed records. The model will be used by staff to determine a processing plan based on the potential results in terms of resource cost to NARA and impact on researchers. This analysis should aid in providing records to the public as quickly as possible. This effort is still ongoing.

Fast track processing of presidential records

The Presidential Libraries have identified series of records which are eligible for fast track processing. These series of records are not likely to invoke Presidential Records Act or Freedom of Information Act (FOIA) restrictions and therefore can be screened and cleared by the incumbent and former president quickly.

Objectives, Scope, Methodology

The objective of the audit was to evaluate and assess the process of making archival records available to the public in a timely manner. In addition, we assessed whether the processing of textual records continues to be a material weakness. All audit work was performed at Archives II in College Park, MD.

We examined applicable laws, regulations, and NARA guidance including: (a) Revisions to the Office of Management and Budget (OMB) Circular A-123, *Management's Responsibility for Internal Control;* (b) Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government;* (c) OMB Circular A-11, *Preparation, Submission, and Execution of the Budget ;*(d) The Presidential Records Act of 1978; (e) Presidential Libraries Manual 1401; and (f) Research Services and Office of Presidential Libraries procedural manuals.

We held discussions with NARA employees and officials within Research Services (R), Legislative Archives, Presidential Libraries, and Museum Services (L), and the Performance and Accountability Office (CP). We analyzed processing statistics and trends from FY 2008 to FY 2012. We evaluated the adequacy of processing backlog reduction plans and annual work plans. We assessed the adequacy of material weakness action plans and reviewed planned processing initiatives. We also reviewed quarterly performance narratives. Finally, we reviewed staffing assigned to processing at each location and processing policies and procedures.

Our audit work was performed between March 2012 and February 2013[5]. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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[5] This report was delayed as a result of resource constraints.

Audit Results

1. NARA does not have a unified agency strategy for addressing processing.

The strategic direction of NARA's processing program needs to be adjusted to ensure the continual reduction of the current backlog. While there is an agency wide processing goal, each Research Services field location and each Presidential Library has operated in silos when determining how to decrease their individual backlog and to meet the overall agency goal and no one office currently provides oversight for the processing program. Major challenges affecting NARA's ability to reduce the backlog continues to center around maximizing resources and processing of presidential records. Without a NARA-wide approach to further reduce the current backlog, NARA may be hindering its ability to process records timely to ensure access by the public as soon as legally possible. The following observations need to be addressed to strengthen the processing program:

- There is no one overall definition of and no formal agency policy for processing.
- Research Services field locations have no plans or inadequate plans for reducing their processing backlogs.
- Unprocessed records (or inadequately processed records) are being served to researchers which could contain restricted information.
- Presidential libraries have made minimal progress in processing their backlog.
- Staffing is not adequate within some archives to reduce the current backlog.
- NARA's current strategic processing goal is not attainable.

Lack of processing definition and agency policy for processing

There is no one overall agency definition for processing. We interviewed several Research Services (R) field locations and libraries in the Office of Presidential Libraries (LP), and some defined the steps required to be performed before a record is considered processed differently from others. There was also no agreement between them on whether basic preservation was part of processing. Although each definition was similar or contained certain steps, management was not all in agreement on what procedures actually constitute processing of records at NARA[6]. For example LP did not require processed records to be described in ARC before the record is considered processed. In the Performance Measurement and Reporting System (PMRS) metric

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[6] Processing at the Presidential Libraries differs from processing in R due to the requirements in the Presidential Records Act. This Act entitles the former President and the incumbent to exercise executive privilege in determining what records can be released. This requires NARA to conduct a page-by-page review of Presidential records.

document, the definition of processed does not include describing the record in ARC for LP. However, NARA's Performance and Accountability report states processing involves a series of steps including describing the record in NARA's online catalog. In addition, all other offices must have an ARC entry completed before a record is considered processed. We interviewed officials in the Performance and Accountability office and they believed the PMRS metric document for LP was supposed to include an ARC description. Therefore there is confusion and a lack of consistency within the agency regarding what actions should be included in processing of records.

In addition, there is no formal agency policy on processing. Although the agency reported under one processing goal and metric, an overall agency policy guiding processing decisions has never been created. According to GAO's *Standards for Internal Control in the Federal Government*, management is responsible for developing the detailed policies to fit their agency's operations. There is a need for a NARA-wide policy and definition for processing that will help facilitate consistency among offices and increase clarity concerning what elements are included in processing which drives the agency goals. Management in R agreed that an agency-wide processing framework needed to be established.

Non-existent or inadequate processing plans for some regional archives

Some Research Services field locations did not have a plan in place for reducing their processing backlog or the plan in place was not adequate. Since the field locations had a smaller processing backlog compared to Research Services Washington, DC (R-DC) management had not given proper attention to reducing the backlogs in field locations.

NARA's Research Services has 13 field locations loosely organized regionally with a Western region (RW), Midwest region (RM), Eastern region (RE), and St Louis (RL). In 2008 the agency developed the metric for the goal to have 95% of holding processed by FY 2016. In response to this, the former Office of Regional Record Services (now in part within Research Services) required each then regional archive to create a five year processing plan to reach the agency goal by FY 2013. These plans were supposed to establish staffing assignments, priorities, and measurable milestones. We found that all of them failed to maintain a plan to reduce their backlogs and some plans were not adequate because they did not reflect current assignments, milestones, and changes that occurred. Research Services management officials agreed processing plans needed to be created to help reduce the current backlog.

As shown in the table below, the San Bruno, St Louis, and Chicago field locations have large backlogs but did not have a backlog reduction plan in place. In addition, the backlog reduction plans for the RE field locations were not adequate to reflect current assignments, milestones, and document how backlogs would be reduced.

Table 1: Processing at Research Services Field Locations

Region	Office	Percentage Processed					Backlog as of FY2012	Backlog Reduction Plan
		2008	2009	2010	2011	2012		
	Regions Total	19.08%	42.70%	54.13%	65.85%	70.08%	29.92%	
	Western Region Total	13.35%	21.73%	37.74%	44.01%	53.31%	46.69%	
Western Region	Anchorage	25.80%	43.99%	47.76%	49.17%	62.37%	37.63%	Yes
	Riverside	17.81%	0.00%	41.48%	30.36%	37.98%	62.02%	Yes
	San Bruno	3.91%	12.48%	21.67%	28.25%	40.75%	59.25%	No
	Seattle	16.84%	26.14%	51.29%	72.67%	74.72%	25.28%	Yes
St Louis	St Louis	100.00%	25.65%	31.10%	35.01%	34.55%	65.45%	No
	Mid-West Region Total	20.69%	55.94%	60.65%	73.40%	74.40%	25.60%	
Mid-West Region	Chicago	6.25%	8.17%	41.02%	42.71%	37.54%	62.46%	No
	Denver	21.05%	100.00%	100.00%	100.00%	100.00%	0.00%	No backlog
	Fort Worth	32.99%	81.44%	99.20%	98.99%	99.53%	0.47%	No backlog
	Kansas City	0.00%	25.64%	42.31%	58.65%	77.65%	22.35%	Yes
	Eastern Region Total	21.35%	39.13%	57.06%	69.02%	74.12%	25.88%	
Eastern Region	Philadelphia	31.66%	43.41%	66.64%	71.68%	72.12%	27.88%	Yes*
	Atlanta	40.00%	44.73%	53.38%	60.42%	69.62%	30.38%	Yes*
	New York	1.54%	45.56%	60.05%	74.62%	77.65%	22.35%	Yes*
	Boston	2.00%	21.80%	46.77%	77.60%	84.50%	15.50%	Yes*

***Processing plans were not detailed to include how the backlog would be worked through.**

Management has not provided effective oversight for the Research Services field locations to ensure adequate backlog reduction plans existed. This occurred because management focused backlog reduction efforts on Archives II which had the largest backlog and management did not believe increased attention was needed in the field locations. Without increased oversight on reducing the backlogs in Research Services field locations, NARA may not adequately meet its mission of providing timely access to records as soon as legally possible.

Serving unprocessed records to the public

In an effort to meet NARA's mission of providing access to records as soon as possible, NARA has been serving unprocessed records to researchers. Providing access to unprocessed records could result in the unintentional disclosure of restricted data or personally identifiable information (PII). PII includes social security numbers, medical and personnel files, financial information, investigative files, and other restricted information. Management officials at the St Louis field location stated the first priority is to provide access to the records even if they are not processed. However, management stated they try to make every effort to ensure those records do not need any immediate preservation work before serving them. The practice of serving unprocessed records occurs throughout Research Services,[7] but is more prevalent in field locations with a large amount of reference requests like St Louis and RD-DC. If the current processing backlog does not steadily decrease, NARA will have to continue to make decisions about serving unprocessed records in order to grant access to the public. NARA is in the process of conducting a study to evaluate the costs and benefits of serving processed versus unprocessed records.

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[7] According to an official in the Presidential Materials Division, presidential libraries do not serve unprocessed records.

<u>Presidential libraries have made minimal progress in reducing processing backlogs</u>

The processing backlog in LP has remained stagnant since measures were established in 2008 (see Table 2 below). This is due to presidential library staff continually responding to Freedom of Information Act (FOIA) and other special access requests which have limited the performance of systematic processing. This coupled with the page by page review required for most of their records have essentially halted any progress in reducing their backlog.

Table 2: Presidential Library Processing

	FY2008	FY2009	FY2010	FY2011	FY2012
Library % Processed	42.15%	42.62%	43.52%	43.11%	45.71%
Volume of Records (cu.ft.)	256,707	284,470	287,168	293,505	293,216
Volume of Processed Records (cu.ft.)	108,224	121,259	124,981	126,550	134,050
Backlog of Unprocessed Records	148,483	163,211	162,186	166,955	159,166

We interviewed officials from each library and their projections for getting through the processing backlog ranged from five years to decades. At the current pace NARA may never get through the processing backlog if no changes are made to the presidential libraries processing program. Also not included in the presidential library's backlog is a large volume of electronic records that will greatly contribute to the amount of processing work to be done (see issue 2). The Executive for Legislative Archives, Presidential Libraries, and Museum Services stated staffing declines in the libraries have made it difficult to make progress in processing records.

<u>Staffing may not be adequate within certain offices to reduce the current processing backlog</u>

Staffing utilization within RD-DC is not adequately aligned to reduce the current backlog. RD-DC is comprised of Archives I in Washington, DC and Archives II in College Park, MD. Archives II accessions the largest amount of records and consequently has the largest backlog of unprocessed records in cubic feet; while Archives I has a minimal backlog. A total of 60 staff members are assigned to describe and process records within these two locations. However, the number of staff assigned to description and processing in RD-DC has never reached the minimum projection of 104, which was deemed necessary in the *2007 NWC Management Report on the Processing Initiative*[8] to meet the 2016 agency goal of 95% processed. In addition, staffing utilization between the archives in RD-DC is not aligned strategically to make the best use of resources needed to reduce the larger backlog at Archives II. According to management in RD-DC, Archives I is overstaffed and some staff have had to be assigned to work in areas other than processing. The table below shows that staffing is not aligned to where the larger backlog resides. Archives II has three times the volume of records than Archives I but has only

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[8] NWC was the former Office of Records Services- Washington DC. This office is now part of Research Services. The Management Report on the Processing Initiative proposed changes to the processing function within that office in order to assist the agency in meeting processing goals.

twice as many staff assigned to processing. The Executive for Research Services agreed that staffing changes need to occur within Archives I and Archives II.

Table 3: FY 2012 Volume of Records and Staff within RD-DC

Office	Volume of Records (in cubic feet)	Volume of Unprocessed Records (in cubic feet)	Percentage Processed	Backlog Percentage	Staff Assigned to Processing
Archives I	570,906	17,243	97%	3%	19
Archives II	1,677,903	701,168	58%	42%	41

Another challenge affecting both RD-DC and the Research Services field locations is staff splits their time between processing, emergency, and special projects which has hindered the reduction of the current processing backlog. Specifically in RD-DC staff members have been diverted from processing to work in the following areas listed below.

1. Annually approximately five full time equivalents (FTE) have participated in the former NW Archivist Development Program.
2. In FY 2012 four FTE's were diverted from processing to complete unplanned assignments.
3. In the past three years, a total of four staff members have been transferred from description and processing to fill critical vacancies in other RD-DC units.

Without proper staffing, NARA's ability to complete processing work to continually reduce the backlog and provide proper records access to the public is limited.

NARA's current strategic processing goal is unattainable

NARA's Strategic Plan includes a performance target related to processing records to ensure access by the public as soon as legally possible. According to strategic goal 2.2, by 2016 NARA is to have 95% of its holdings processed to the point where researchers can have efficient access to them. In FY 2010, for the first time since targets were established, NARA did not reach its processing goal of having 50% of holdings processed. NARA also did not meet the 2011 goal of being 55% processed. Although the agency met the revised 2012 goal of being 60% processed, it is unrealistic, given current staffing constraints, that the 2016 strategic goal of 95% processed will be achieved.

Table 4: Processing Performance Data

Performance Data	FY 2008	FY 2009	FY 2010	FY 2011	FY 2012
Performance target for percent of archival holdings that have been processed to the point where researchers can have efficient access to them.	30	40	50	55	60
Percent of archival holdings that have been processed to the point where researchers can have efficient access to them.	30	41	47	53	60

Several challenges have hindered NARA from reaching its goals. These challenges include:

- more series remain to be processed than in prior years,
- information received from agencies related to records is typically inaccurate and incomplete, and have access issues that were not properly identified,
- records accessioned in recent years often contain a mixture of permanent, temporary, non record and duplicative materials, and
- staff split their time between processing and emergency and special projects.

All of these factors lengthen the time needed to process records. Management in R agreed the current goal will not be reached by FY 2016.

The Office of Performance and Accountability (CP) created a processing calculator to assist in determining ways to reduce the processing backlog. The tool allows for changes in staffing and productivity in order to determine how those numbers affect the processing backlog. It also gives a view into whether the strategic goals for processing are realistic. Assuming the same amount of resources and an average volume of new accessions as of the end of FY 2012, the processing calculator predicted it would take NARA until FY 2020 to work through the current backlog. The calculator also predicts that by FY 2016 NARA would only be 85% processed. Therefore the FY 2016 goal needs to be reassessed and new goals should be set to reflect the current status of archival processing and available resources.

Recommendation 1

The Archivist should ensure an analysis is conducted of the organizational structure and responsibilities of each office involved in processing. This should include a determination whether the processing strategy can be effectively implemented with a decentralized structure, or if one NARA office should have authority over the entire Processing Program.

Recommendation 2

The Executive of Research Services should:

a) Coordinate with the Executive for Legislative Archives, Presidential Libraries, and Museums to develop a processing policy and agency definition. This policy and definition should highlight the differences between federal records processing and processing of presidential records.

b) Ensure the San Bruno, St. Louis, and Chicago field locations have a current processing backlog reduction plan. These plans should be developed yearly and updated periodically during the year as necessary. Each plan should include strategies on how the backlog will be reduced, define milestones, and outline staffing assignments.

c) Ensure the cost benefit analysis study on serving unprocessed records is completed. Ensure it outlines the risks and benefits of serving unprocessed records with appropriate strategy that is consistent across the agency.

d) Conduct a workload analysis to determine if resource allocation between AI and AII is appropriate. If not, make staffing changes to better utilize staff where the greater need resides. Also assess workloads at field locations and make adjustments if necessary.

Recommendation 3

The Executive for Legislative Archives, Presidential Libraries, and Museums should:

a) Analyze the backlogs at the pre-PRA libraries and create processing plans for reducing the backlogs at these libraries on a more accelerated basis.

b) Assess if there are additional ways to accelerate processing at the PRA libraries.

c) Work with the Performance and Accountability Office to update the PMRS metadata to require an ARC entry prior to considering presidential records processed.

Recommendation 4

The Executive for Research Services and the Executive for Legislative Archives, Presidential Libraries, and Museums should work with the Performance and Accountability Office to reassess current processing goals and make changes to the goals to reflect the current state of processing and ensure the goals are realistic and attainable.

Management Response

Management concurred with the recommendations.

2. Libraries currently have a large volume of electronic records that are not captured in any backlog calculation and there is no measure in place to track them.

The Office of Presidential Libraries (LP) lacks a performance measure for accurately tracking processing workloads and backlogs for electronic records. With the increasing amount of electronic presidential records, management is just beginning to realize the large amount of work needed to process them and therefore the need to track and measure the related workload. NARA's second strategic goal is to process records to ensure access as soon as legally possible. Without appropriate tracking or measurement of these electronic records, NARA cannot fully assess progress against this goal. In addition, NARA does not have any visibility into the LP's electronic records backlog and therefore cannot adequately plan how to reduce the current presidential libraries backlog.

LP began receiving electronic records with President Ronald Reagan's administration and the volume has grown exponentially with the subsequent presidents. These electronic records are not currently being tracked to determine how many have been processed or remain unprocessed. Since they are subject to the Presidential Records Act, these records require careful review before release and hence will take longer to process. According to management over 95% of these records remain unprocessed.

Table 5: Presidential Libraries Electronic Archival Holdings as of 2012

Library	Logical Data Records[9]
Reagan	2,962,661
Bush	8,853,824
Clinton	23,491,555
GW Bush	260,864,125
Presidential Library Materials Division	10,472,917
Total	**306,645,082**

As the trend suggests in table 5 above, the volume of electronic records will continue to increase with each subsequent administration. As such, NARA will have to determine how to capture these records in the current backlog and align staffing and other resources to ensure progress can be made in reducing the backlog. Without proper tracking of these electronic records NARA cannot demonstrate the library's progress in making these records

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[9] These electronic records reside in the Presidential Electronic Records Library system and in the Executive Office of the President (EOP) instance of Electronic Records Archive system (ERA). The formats include HTML, text files, digital image files, emails, office automation products (Microsoft Word, Excel, Access, PowerPoint, etc.), Adobe Acrobat portable document format files (PDF), extensible markup language files (XML), and raw camera files.

available nor can NARA determine the true staffing needed to reduce the backlog at the presidential libraries.

Recommendation 5

The Executive for Legislative Archives, Presidential Libraries, and Museum Services should:

a) Work with the Performance and Accountability Office to develop a performance measure for tracking the processing of electronic presidential records.
b) Determine the true backlog of electronic presidential records and determine if additional resources are needed and can be obtained to handle the increased workload.

Management Response

Management concurred with the recommendation.

3. Processing statistics were not accurately reported in PMRS.

The Nixon library and the St Louis field location have reported inaccurate processing data in the Performance Measurement and Reporting System (PMRS). This occurred because records were transferred to them that were already processed and they had erroneously omitted the records from the processing data reported into PMRS. Each office certifies quarterly that the data contained within PMRS is accurate. According to OMB Circular A-11, federal agencies are required to assess the completeness and reliability of performance data reported. Without accurate data going in PMRS, NARA cannot correctly report on how the agency is performing relative to its strategic goals. In addition, NARA could potentially report inaccurate data to Congress.

PMRS is the official source for statistical management information at NARA. In particular, it reports how NARA is doing relative to the numeric goals in NARA's Strategic Plan and the various annual performance plans. Those results form the basis for reports to Congress each year. Within PMRS, sub goal 2.2.1 contains the statistical data for textual holdings processed for NARA. Data is captured into PMRS in two ways.

1. For those archives using the Holdings Management System (HMS) a query is run that captures all processed and unprocessed data for the reporting month. The file is read by PMRS.
2. The presidential libraries and those Research Services field locations that do not use HMS log into a web application and manually update it with the amount processed for the reporting month.

Both the Nixon library and the St. Louis field location manually provided their data to PMRS. Although we only noted these two incidents there could potentially be more inaccuracies in the data being reported to PMRS.

Recommendation 6

The Executive for Legislative Archives, Presidential Libraries, and Museums and the Executive for Research Services should ensure a review is performed to validate the accuracy of processing data supplied to the Performance and Accountability Office.

Management Response

Management concurred with the recommendation.

4. Documented processing procedures did not exist or were not updated for some archives and libraries performing processing.

Documented processing procedures were either not formalized or not updated for some of the Research Services field locations and presidential libraries. Procedures did not exist or were not updated because those field locations and libraries used the knowledge of many seasoned employees to explain procedures and updating older procedures was not a priority. GAO's *Standards for Internal Control in the Federal Government,* states management is responsible for developing the detailed policies, procedures, and practices to fit their agency's operations and to ensure that they are built into and an integral part of operations. Information should be recorded and communicated to management and others within the entity, who need it, and in a form and within a time frame, which enables them to carry out their internal control and other responsibilities. Lack of current documented procedures could result in inconsistent process operations, key person dependencies, and overall process inefficiency. For example, there was confusion over the definition of processing and various archives and libraries used various definitions for processing records.

During the course of our audit, we were unable to obtain written procedures for some of the Research Services field locations and presidential libraries because they did not exist. In addition, some presidential library procedures we received were outdated. As indicated in the table below, we were unable to obtain processing procedures for 15 Research Services field locations and presidential libraries, and three presidential libraries had procedures that were five or more years old.

Table 6: Processing Procedures by Office

Office	Procedure Manual Exists	Last Procedure Update
Archives I & II	Yes	2010
Anchorage	No	
Riverside	No	
San Bruno	No	
Seattle	No	
Chicago	No	
Denver	No	
Fort Worth	Yes	2009
Kansas City	Yes	2012
St Louis	No	
Atlanta	No	
Boston	No	
New York	No	
Philadelphia	No	
Hoover	No	
Roosevelt	No	
Truman	No	
Eisenhower	Yes	1971
Kennedy	Yes	2013
Johnson	Yes	1975
Nixon	No (currently under draft)	
Ford	Yes	2012
Carter	Yes	Main procedures (Outdated, however we could not determine the date that these procedures were updated) Addendums (2008)
Reagan	Yes	Various procedures were updated between 2004-2012
Bush	Yes	2011
Clinton	Yes	2011
G.W. Bush	Yes	2012

Recommendation 7

The Executive of Research Services should ensure procedures for all field locations are documented. Review existing procedures and update as necessary.

Recommendation 8

The Executive for Legislative Archives, Presidential Libraries, and Museums should ensure procedures for all presidential libraries are documented. Review existing procedures and update as necessary.

Management Response

Management concurred with the recommendations.

Appendix A – Acronyms and Abbreviations

ARC	Archival Research Catalog
ARCIS	Archives and Records Centers Information System
CP	Performance and Accountability Office
FOIA	Freedom of Information Act
FTE	Full time equivalent
FY	Fiscal Year
GAO	Government Accountability Office
HMS	Holdings Management System
L	Legislative Archives, Presidential Libraries and Museum Services
LP	Office of Presidential Libraries
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
PII	Personally Identifiable Information
PMRS	Performance Measurement Reporting System
R	Research Services
RD-DC	Research Services Washington DC
RE	Archival Operations- East
RL	Archival Operations- St Louis
RM	Archival Operations- Midwest
RW	Archival Operations- West

Appendix B – Management's Response to the Report

NATIONAL
ARCHIVES

Date: SEP 0 6 2013

To: James Springs, Acting Inspector General

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

Subject: OIG Revised Draft Audit 13-14, Audit of Processing of Textual Records

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

We concur with all eight recommendations in this audit, and we will address them further in our action plan.

If you have any questions or need additional information on these comments, please contact Mary Drak by phone at 301-837-1668 or via email at mary.drak@nara.gov.

DAVID S. FERRIERO
Archivist of the United States

NATIONAL ARCHIVES and
RECORDS ADMINISTRATION

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COLLEGE PARK, MD 20740-6001
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Appendix C – Report Distribution List

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