OFFICE of INSPECTOR GENERAL
NATIONAL ARCHIVES

June 20, 2017

TO: David S. Ferriero
Archivist of the United States

FROM: James Springs
Inspector General

SUBJECT: *Review of the National Archives and Records Administration's Readiness to Implement the Digital Accountability and Transparency Act of 2014*

This memorandum transmits the results of the final report for the *Review of the National Archives and Records Administration's Readiness to Implement the Digital Accountability and Transparency Act of 2014 (OIG Report No. 17-R-14).* We have incorporated the formal comments provided by your office.

We contracted with the independent certified public accounting firm CliftonLarsonAllen LLP (CLA) to review NARA's readiness to implement the Digital Accountability and Transparency Act of 2014. The contract required the review be performed in accordance with the Council of Inspector General on Integrity and Efficiency (CIGIE) Quality Standards for Inspections and Evaluation and the CIGIE DATA Act Readiness Review Guide (version 2.0).

CLA found that although NARA had not formally documented, or only partially documented some of the first four steps in the DATA Act Readiness Review Guide, the agency, in conjunction with Administrative Resource Center (ARC) was ready and had executed its implementation plan and certified on April 26, 2017 its FY 2017 Quarter 2 data submissions.

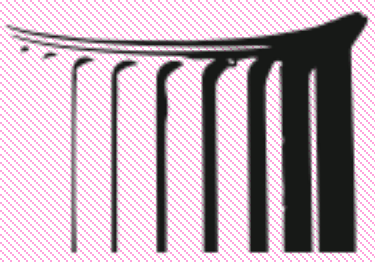
CLA is responsible for the attached report dated June 16, 2017, and the results expressed in the accompanying report. To ensure the quality of their work performed, we evaluated the independence, objectivity, and qualifications of the staff; reviewed the plan and approach of the review; monitored the performance of the review; reviewed CLA's report and related documentation; and inquired of its representatives. Our review disclosed no instances where CLA did not comply, in all material respects, with inspections and evaluation standards.

The report contains two recommendations to improve NARA's efforts in compliance with the requirements of the DATA Act prospectively. Your office concurred with the recommendations. Based on your June 16, 2017 response to the draft report, we consider all the recommendations open. Once your office has fully implemented the recommendations, please submit evidence of completion of agreed upon corrective actions so that recommendations may then be closed.

Your response to the draft report is attached. As with all OIG products, we determine what information is publically posted on our website from the attached report. Accountability has stated NARA does not desire any redactions to the posted report.

Consistent with our responsibility under the *Inspector General Act, as amended*, we may provide copies of this report to congressional committees with oversight responsibility over the National Archives and Records Administration.

We appreciate the cooperation and assistance NARA extended to us during the review. Please call me with any questions, or your staff may contact Jewel Butler, Assistant Inspector General of Audits, at (301) 837-3000.



OFFICE *of*
INSPECTOR GENERAL
NATIONAL ARCHIVES

Review of NARA's Readiness to Implement the Digital Accountability and Transparency Act

June 16, 2017

OIG Report No. 17-R-14

CliftonLarsonAllen LLP
www.claconnect.com

Review of the National Archives and Records Administration's Readiness to Implement the Digital Accountability and Transparency Act of 2014

Prepared by:
CliftonLarsonAllen LLP
901 North Glebe Road, Suite 200
Arlington, VA 22203

June 16, 2017

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Executive Summary

Review of NARA's Readiness to Implement the DATA Act

OIG Report No. 17-R-14 June 16, 2017

Why Did We Conduct This Review

CliftonLarsonAllen LLP (CLA) was engaged by the National Archives and Records Administration (NARA) Office of Inspector General (OIG) to perform a review of NARA's readiness to implement the provisions of the Digital Accountability and Transparency Act of 2014 (DATA Act). The review includes gaining an understanding of the processes, systems and controls which NARA, and its shared service provider (SSP) have, or plans to implement to report agency expenditures and link Federal contract, load, and grant spending information in accordance with the requirements of the DATA Act. This understanding is necessary for the OIG to develop an informed methodology for future OIG reviews required by the DATA Act. The results of this review will also enable the IG to provide recommendations on improving the likelihood of compliance with the requirements of the DATA Act.

What Did We Recommend?

We recommend that NARA:
(1) Formally document its governance structure and mission statement for the DATA Act working group or its subsequent itineration; and
(2) Formally document its policies and procedures for reviewing data and systems, including those completed on NARA's behalf by ARC.

What Did We Find?

CLA found that although NARA had not formally documented, or only partially documented some of the first four steps in the DATA Act Readiness Review Guide (Guide), the agency, in conjunction with Administrative Resource Center (ARC) was ready and had executed its implementation plan and certified on April 26, 2017 its FY 2017 Quarter 2 (Q2) data submission. NARA explained that formally documenting was challenging due to the evolving nature of the requirements and the real time requirement to implement the plan. Not formally and completely documenting the executed steps in the Playbook specific to NARA's role and its relevant activities with ARC could potentially result in inconsistent implementation and execution in the future, lost institutional knowledge, and delays caused by potential misunderstanding between NARA and ARC.

NARA's SSP is the United States Department of the Treasury (Treasury) Bureau of the Fiscal Service's (BFS) ARC. The Treasury OIG conducted an audit of ARC's efforts to report financial and payment information on behalf of its customer's agencies as of September 30, 2016. The Treasury OIG report *DATA Act Readiness: ARC Is Making Progress in Meeting DATA Act Reporting Requirements Despite Challenges*, OIG-17-039 dated April 13, 2017, indicates that Treasury OIG identified a number of risks and challenges related to its DATA Act implementation efforts on behalf of its customer agencies, including: data quality concerns, PMO and OMB delays in finalizing Government-wide guidance resulting in short implementation timelines, resource limitations, systems change concerns, customer engagement, and difficulty identifying customer award information. ARC documented, and is in the process of executing, viable corrective actions to overcome these identified challenges. Treasury OIG's report indicates that if ARC fully executes its DATA Act implementation plan as designed, ARC will meet the DATA Act reporting requirements by the established May 2017 deadline.

CliftonLarsonAllen LLP
June 16, 2017

Background

On May 9, 2014, President Obama signed the Digital Accountability and Transparency Act (DATA) Act into law. Once implemented, the DATA Act is intended to make Federal spending data more accessible, searchable, and reliable. Also, it is designed to not only make it easier to understand how the Federal government spends taxpayer dollars, but will also serve as a tool for better oversight, data-centric decision-making, and innovation both inside and outside of government. The US Department of Treasury (Treasury) and OMB are leading the government wide implementation of the DATA Act.

The DATA Act directs the federal government to standardize and publish its wide variety of reports and data compilations related to spending: financial management, payments, budget actions, procurement, and assistance. The intended stakeholders of the DATA Act have been well-articulated. The most frequent users of DATA Act information will likely be the media, Congress and its staff, agency officials, advocates, OIGs, OMB, Treasury, and the general public.

The DATA Act has several purposes:

(1)Expand the Federal Funding Accountability and Transparency Act of 2006 (FFATA) by disclosing direct Federal agency expenditures and linking Federal contract, loan, and grant spending information to programs of Federal agencies to enable taxpayers and policymakers to track Federal spending more effectively.
(2)Establish Government-wide data standards for financial data and provide consistent, reliable, and searchable Government-wide spending data that is displayed accurately for taxpayers and policymakers on USAspending.gov (or a successor system that displays the data).
(3)Simplify reporting for entities receiving Federal funds by streamlining reporting requirements and reducing compliance costs while improving transparency.
(4)Improve the quality of data submitted to USAspending.gov by holding Federal agencies accountable for the completeness and accuracy of the data submitted.
(5)Apply approaches developed by the Recovery Accountability and Transparency Board (Recovery Board)[1] to spending across the Federal government.

[1] The Recovery Board was a Federal agency that oversaw spending under the American Recovery and Reinvestment Act of 2009 (Recovery Act) and managed Recovery.gov. Recovery.gov displayed Recovery Act spending information reported by recipient agencies. Pursuant to law, the recovery Board ceased operations in September 2015.

To fulfill this purpose, the DATA Act imposes requirements on the Director of OMB, the Secretary of Treasury, the Office of Inspector General (OIG) of each Federal agency, and the Comptroller General of the United States.

Specifically, the DATA Act requires that (1) OMB and Treasury establish, by May 2015, Government – wide financial data standards for Federal funds made available to or expended by Federal agencies and entities receiving Federal funds; (2) Treasury, in consultation with OMB, ensure such financial data is accurately posted and displayed on USAspending.gov (or a successor system) by May 2017; and (3) OMB and Treasury ensure the data standards established are applied to the data made available on the website by May 2018.

Role of Inspectors General

The DATA Act requires the OIG of each Federal agency to perform three reviews of a statistically valid sampling of the spending data submitted under the DATA Act by the Federal agency, and submit to Congress and make publicly available a report assessing the completeness, timeliness, quality, and accuracy of the data sampled and the implementation and use of data standards by the Federal agency. Under the Act, the first OIG reports were due November 2016 with the other two following at 2-year intervals (November 2018 and November 2020).
The Council of the Inspectors General on Integrity and Efficiency (CIGIE) identified a timing anomaly with the oversight requirements contained in the DATA Act. That is, the first OIG reports are due to Congress in November 2016; however, Federal agencies are not required to report financial and payment information in accordance with the data standards established under the DATA Act until May 2017. To address this reporting date anomaly, the OIGs plan to provide Congress with their first required reports in November 2017, a one-year delay from the statutory due date, with subsequent reports following on a two-year cycle. Although CIGIE determined the best course of action was to delay the OIG report, CIGIE encouraged the OIGs to undertake DATA Act "Readiness Reviews" at their respective agencies well in advance of the first November 2017 report. On December 22, 2015, CIGIE's chair issued a letter memorializing the strategy for dealing with the OIG reporting date anomaly and communicated it to the Senate Committee on Homeland Security and Government Affairs and the House of Committee on Oversight and Government Reform.

The OIG community, through the Federal Audit Executive Council (FAEC), stood up the FAEC DATA Act Working Group (Working Group). On December 03, 2015, the Working Group issued the DATA Act Readiness Review Guide (version 1.0) to assist OIGs in their readiness reviews. That guide concentrated on steps 1 through 4 of the "Agency 8-Step Plan" as described in the OMB and Treasury DATA Act Implementation Playbook (version 1.0). In addition, the FAEC produced the DATA Act Readiness Review guide version 2.0 on June 02, 2016, which includes procedures for the OIGs' review on each of the 8 steps from the original implementation plan.

The OMB and Treasury DATA Act Implementation Playbook, Agency 8-Step Plan includes the following steps:

1. **Organize Team**: Create an agency DATA Act work group including impacted communities (e.g., CIO Budget, Accounting, etc.) and identify a Senior Accountable Officer (SAO);
2. **Review Elements**; Review the list of DATA Act elements and participate in data definitions standardization efforts;
3. **Inventory Data**: Perform an inventory of Agency data and associated business processes;
4. **Design & Strategize:** Plan changes to systems and business processes to capture financial, procurement, and financial assistance data;
5. **Execute Broker**: implement a "broker" at the agency. The broker is a virtual data layer at the agency that maps, ingests, transforms, validates, and submits agency data into a format consistent with the DATA Act Schema (i.e., data exchange standards).
6. **Test Broker Implementation**: test broker outputs to ensure data are accurate and reliable;
7. **Update Systems:** implement other system changes iteratively (e.g., establish linkages between program and financial data, capture any new data); and
8. **Submit Data**: update and refine the processes (repeat 5-7 as needed).

NARA has an interagency agreement with ARC to provide full service accounting and financial reporting services. ARC maintains the financial accounts of NARA and prepares its financial statements. According to NARA, ARC will largely handle the implementation efforts for the DATA Act on NARA's behalf, with NARA input and oversight. Although NARA is largely relying on the implementation efforts of the ARC's efforts to report financial and payment information, on behalf of its customer agencies, NARA management is responsible for the implementation of the DATA Act. The results of our procedures are described in the Results section of this report.

ARC is a center within the Treasury's Bureau of Fiscal Service (BFS). The Treasury OIG performed the evaluation ARC's readiness as a Federal shared service provider (FSSP) to implement the DATA Act requirements for the benefit of ARC's customers. The Treasury OIG issued its audit report titled "*DATA Act Readiness: ARC is Making Progress in Meeting DATA Act Reporting Requirements Despite Challenges*" dated April 13, 2017.

Objectives, Scope, Methodology

Objective

a. The objective of this review is to assess NARA's readiness to implement the provisions of the DATA Act of 2014.
b. This review is necessary for the OIG to develop an informed methodology for the future OIG reviews required by the DATA Act.
c. Moreover, the results of this review will also enable the OIG to provide recommendations on how to improve the likelihood of compliance with the requirements of the DATA Act.

Scope

a. The NARA OIG contracted with CLA to perform a review of NARA's readiness to implement the DATA Act.
b. The implementation of the DATA Act is an ongoing process that continues to evolve as OMB and Treasury provide additional guidance and NARA and its FSSP move forward with the implementation process.
c. Our readiness review was based on Steps 1-4 in the DATA Act Readiness Review Guide (Guide) issued by the IG community through the Federal Audit Executive Council (FAEC) Data Act Working Group (version 2.0).
d. We did not perform steps 5-8 of the Guide.
e. It was not within the scope of our review to conduct gap analyses or system evaluations to measure and verify NARA's ability to comply with the DATA Act. Such activities are management's responsibility.
f. Our scope was limited to making inquiries of management concerning those activities and reviewing documentation as provided by management.

Methodology

a. CLA conducted the readiness review in accordance with the Quality Standards for Inspections and Evaluations issued by CIGIE.
b. The review includes gaining an understanding of the processes, systems and controls which NARA has implemented, or plans to implement to report Federal agency expenditures and linking Federal contract, loan, and grant spending information in accordance with the requirements of the DATA Act.
c. We conducted interviews and made inquiries with NARA officials representing the DATA Act workgroup. In addition, we reviewed policies and documentation covering areas such as NARA's 1) implementation plan, 2) DATA Act governance activities, 3) data inventory of data elements, 4) mapping to the DATA Act schema, and 5) communications with OMB and Treasury.

d. For NARA's shared service provider, ARC, we determined if NARA:
    1) communicated with the ARC DATA Act implementation team, and
    2) took the necessary actions for any business process changes that ARC informed them were required to ensure data elements would be captured, appropriate awardee information would be reported, and payment and financial transactions would be reported accurately.
e. To avoid disruptions to ARC's operations by having all OIGs of its customers independently performing review of its ARC's implementation on behalf of its customer, we discussed with the Treasury OIG through the NARA OIG, the appropriate protocol in reviewing ARC's readiness to implement DATA Act for its customers.
f. Accordingly, CLA relied on the results of the Treasury OIG review of ARC's readiness. We read the audit report issued by Treasury OIG titled "*DATA Act Readiness: ARC is Making Progress in Meeting DATA Act Reporting Requirements Despite Challenges*" dated April 13, 2017.
g. We obtained an understanding of any regulatory criteria related to NARA's responsibilities to report financial and award data under the DATA Act, such as:
    1) OMB M-10-06, Open Government Directive (December 8, 2009)
    2) OMB M-15-12, Increasing Transparency of Federal Spending by Making Federal Spending Data Accessible, Searchable, and Reliable (May 8, 2015)
    3) OMB Management Procedures Memorandum No. 2016-03, Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information (May 3, 3016)
    4) OMB M-17-04, Additional Guidance DATA Act Implementation: Further Requirements for Reporting and Assuring Data Reliability (November 4, 2016)
h. CLA conducted fieldwork between September 2016 and April 2017.
i. We conducted our review at the NARA office in College Park, MD; and the CLA offices in Calverton, MD and Arlington, VA.
j. We waited for Treasury OIG's audit report on ARC's readiness, which was issued on April 13, 2017 before issuing our audit report in order to include ARC's readiness in our report.

Overall Results

We found that NARA, in conjunction with ARC, was ready and had executed its implementation plan and certified on April 26, 2017 its FY 2017 Quarter 2 (Q2) data submission. We recommend, however, areas where NARA could strengthen its internal control over its implementation efforts.

NARA Readiness Review Results

We found that NARA had not formally documented, or only partially documented, some of the first four steps in the 8-step plan in the Playbook. NARA relies heavily on its shared service provider's implementation efforts to report on its financial and payment information. Not formally and completely documenting the executed steps in the Playbook specific to NARA's role and its relevant activities with its service provider could potentially result in inconsistent implementation and execution in the future, lost institutional knowledge, and delays caused by potential misunderstanding between NARA and ARC.

The following is a summary of NARA's DATA Act steps 1 through 4 implementation efforts and status:

Step 1 – Organize Team

Agencies are required to establish a governance structure to manage the implementation of the DATA Act which includes identifying an SAO responsible for implementation of the DATA Act. The designee should be an executive officer with enough seniority and expertise to manage a project across multiple offices and Federal spending communities. The Playbook suggests agencies create a DATA Act working group that includes subject matter experts from across the organization with strong experience in designing and creating the infrastructure used for Federal spending.

Status: As documented in NARA's implementation plan, NARA identified its Chief of Management and Administration as the SAO to supervise the implementation of the DATA Act. The working group was assembled informally as a formal list of members of the working group was not readily available and was compiled as response to the auditor's request for documents. A mission statement documenting that requisite authority had been granted to the working group could not be provided.

Step 2 – Review Elements

The Playbook recommends that each agency review the data elements and participate in the data-element standardization. The SAO and working group were to review the list of DATA Act elements, including the standardized definitions, to ensure they understood how elements were defined and how they relate to the agency's business operations, IT systems, and organization.

Status: NARA, with the assistance of ARC, reviewed the data elements and participated in the process for standardizing the data elements during June and July 2015. As part of this review process, NARA collaborated with ARC, Treasury and OMB in order to gain an understanding of the elements and definitions and to provide feedback. However, NARA could not provide formal documentation that were followed when reviewing data and systems, including those completed on NARA's behalf by ARC.

Step 3 – Inventory Data

According to the Playbook, after reviewing the DATA Act elements in Step 2, the SAO and working group will be ready to perform an inventory of their agency data. The SAO and working group need to trace how the DATA Act elements are used across agency business processes, systems, and applications. Agencies should identify the appropriate source systems where data resides and understand gaps between those systems to determine how the various elements, sources, and processes work together.

Status: NARA conducted a data inventory and mapped the data elements with assistance from ARC in June and July 2015. However, NARA could not provide formal documentation that were followed when performing an inventory of their agency data, including those completed on NARA's behalf by ARC.

Step 4 – Design and Strategize

The Playbook recommends that agencies (1) capture Award IDs to link financial data to agency management systems and (2) develop a comprehensive DATA Act implementation plan, including solutions for addressing gaps in agency data. OMB M-15-12 requires agencies to create a field to link the data contained in financial and management systems so that complete multilevel data may be captured. Agencies were also required to submit updated implementation plans in August 2016. Implementation plans should describe how agencies can best leverage their current information systems, scheduled system upgrades, and FSSPs as required by OMB M-15-12.

Status: NARA in conjunction with ARC, linked its financial data to management systems using Award IDs in April 2016. NARA showed us evidence of the communication with ARC to demonstrate the linkage of data could be accomplished. However, NARA could not provide the policies and procedures that were followed to link financial data to management systems using Award IDS, including those completed on NARA's behalf by ARC.

Additionally, NARA submitted an updated comprehensive DATA Act implementation plan to OMB in August 2016 that captured NARA's strategic direction to implement the Act.

Recommendations

1. We recommend that NARA formally documents its Governance structure and mission statement for the DATA Act working group or its subsequent itineration.

   Management Response

   NARA concurs with this recommendation. NARA will formally document its Governance structure, including a mission statement.

   Target Complete Sate: June 30, 2017

   CLA Analysis

   We consider NARA's proposed actions responsive to our report recommendation. This recommendation will remain open and resolved, pending completion of the corrective actions identified above.

2. We recommend that NARA formally document its policies and procedures for reviewing data and systems, including those completed on NARA's behalf by ARC.

   Management Response

   NARA concurs with this recommendation. NARA will formally document the procedures used for reviewing data and systems.

   Target Complete Sate: June 30, 2017

   CLA Analysis

   We consider NARA's proposed actions responsive to our report recommendation. This recommendation will remain open and resolved, pending completion of the corrective actions identified above.

ARC Readiness Review Results

We reviewed the audit report, *DATA Act Readiness: ARC Is Making Progress in Meeting DATA Act Reporting Requirements Despite Challenges*, OIG-17-039 dated April 13, 2017, issued by the Department of the Treasury (Treasury) OIG of their audit of the ARC efforts to report

financial and payment information, on behalf of its customer agencies as of September 30, 2016, as required by the DATA Act. The Treasury OIG audit report states that if ARC fully executes its DATA Act implementation plan as designed, Treasury OIG anticipates that ARC will meet the DATA Act reporting requirements by the established May 2017 deadline.

In the report the Treasury OIG stated that ARC identified a number of risks and challenges related to its DATA Act implementation efforts on behalf of its customer agencies, including: data quality concerns, Program Management Office (PMO), and OMB delays in finalizing Government-wide guidance resulting in short implementation timelines, resource limitations, systems change concerns, customer engagement, and difficulty identifying customer award information. ARC documented, and is in the process of executing, viable corrective actions to overcome these identified challenges. If ARC's DATA Act implementation plan is executed as designed, the OIG believes the identified challenges will not prevent the implementation of the DATA Act on behalf of its customer agencies.

Data Quality Concerns

The Treasury OIG reports states that ARC faces challenges ensuring the quality and validity of data reported. ARC conducts quarterly reconciliations for each of its customer agencies and revises data extracts to correct errors. Any errors identified through the reconciliations are addressed through coordination with the respective customer agency. ARC also plans to develop system reports to assist in monitoring and troubleshooting data quality.

CLA reviewed the various materials provided by NARA that showed continued collaborations and communication with ARC in revising data extracts to correct errors.

PMO and OMB Delays in Finalizing Government-Wide Guidance

ARC's SAOs and their DATA Act project team faces challenges in creating a total solution for reporting because of the delayed release of finalized technical guidance from Treasury's PMO and OMB. The iterative nature of Government-wide DATA Act implementation efforts has delayed finalization of guidance. Federal agencies have received many draft and pre-decisional requirements that are subject to change. To minimize the issues caused by these delays, ARC's DATA Act project team communicates, as needed, with the departmental offices working group, the PMO, and OMB for clarification on issues as they arise. Further, ARC's DATA Act project team holds quarterly meetings with its customer agencies to (1) keep them apprised of conversations with the Government-wide implementation team; (2) discuss outstanding policy questions, challenges, and status in implementing the DATA Act; and (3) discuss customer requests related to implementation efforts. ARC also tests real data from its customers to identify and resolve issues.

CLA reviewed quarterly meetings notes and documentation NARA held with ARC and communication of the results of the tests of real data.

Resource Limitations

As documented in ARC's project management documents, limited IT resources present another challenge for ARC. ARC is responsible for all system changes, testing, and technical support of ARC's system platform. However, according to the project management documents, ARC may not have the resources to support the implementation of the DATA Act on behalf of its customer agencies, given competing projects. ARC plans to mitigate resource limitations by adding additional resources, if needed, authorizing overtime to implement the DATA Act, and making DATA Act implementation a priority within the division.

NARA interagency agreement with ARC was increased to include costs for the DATA Act implementation.

Systems Change Concerns

ARC faces challenges with the timing and quality of system changes. Specifically, Oracle, ARC's financial system platform, requires four enhancements or software patches to meet DATA Act reporting requirements. Once Oracle releases the patches, ARC plans to conduct its own testing prior to incorporating the patches into its DATA Act reporting process. To mitigate the concerns with the system changes, ARC used in-house resources to design and develop custom solutions to extend the functionality of ARC's current system platform to address DATA Act reporting requirements. ARC plans to continue using its custom solution until the Oracle patches are tested and determined ready for use.

Customer Engagement

ARC faces challenges coordinating with its customer agencies on DATA Act responsibilities, requirements, and guidance. To facilitate customer engagement, ARC holds conference calls, webinars, and workshops with its customers to provide DATA Act updates. ARC also emails its customers DATA Act related guidance and updates, as necessary.

NARA provided CLA with various notes and documentation on ARC's customer engagement.

Difficulty Identifying Customer Award Information

According to an ARC official, a majority of ARC customer agencies' detailed award-level data for procurement transactions will show Fiscal Service as the awarding agency because ARC, the FSSP, contracts/issues awards on behalf of these customer agencies. Since the source data reflects Fiscal Service as the awarding agency, certain customers' detailed award-level data will not show awards that ARC contracted/issued for them, presenting a reconciliation challenge to ARC. To mitigate this challenge, ARC is developing an additional reconciliation process to

identify the correct detailed award-level data for its customer agencies. When matching customer award financial information with the detailed award-level data, it is necessary to identify the funding agency to ensure award-level details are assigned to the true awarding agency.

NARA administers its own procurement and contracts/issues awards. It does not utilize ARC's contracting/procurement services.

Appendix A – Acronyms

ARC	Administrative Resource Center
BFS	Bureau of the Fiscal Service
CIGIE	Council of the Inspectors General on Integrity and Efficiency (CIGIE)
CLA	CliftonLarsonAllen
DATA Act	Digital Accountability and Transparency Act of 2014
FAEC	Federal Audit Executive Council
FFATA	Federal Funding Accountability and Transparency Act of 2006
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
PMO	Project Management Office
SAO	Senior Accountable Officer
SSP	Shared Service Provider

Appendix B – Management Response

NATIONAL ARCHIVES

Date: JUN 16 2017

To: James Springs, Inspector General

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

Subject: Management's Response to OIG Report 17-R-14, *Review of NARA's Readiness to Implement the DATA Act*

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

We concur with both of the recommendations in this audit, and in response, the attachment provides a summary of our proposed actions. As each recommendation is satisfied, we will provide documentation to your office. If you have questions about this action plan, please contact Kimm Richards at kimm.richards@nara.gov or by phone at 301-837-1668.

DAVID S. FERRIERO
Archivist of the United States

Attachment

NATIONAL ARCHIVES *and*
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8601 ADELPHI ROAD
COLLEGE PARK, MD 20740-6001
www.archives.gov

Action Plan Response to OIG Report:
17-R-14, *Review of NARA's Readiness to Implement the DATA Act*

Recommendation 1: We recommend that NARA formally documents its Governance structure and mission statement for the DATA Act working group or its subsequent itineration.

Planned Action: NARA will formally document its Governance structure, including a mission statement.

Target Completion Date: June 30, 2017

Recommendation 2: We recommend that NARA formally document its policies and procedures for reviewing data and systems, including those completed on NARA's behalf by ARC.

Planned Action: NARA will formally document the procedures used for reviewing data and systems.

Target Completion Date: June 30, 2017

Appendix C – Report Distribution List

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Mail: IG Hotline
NARA
P.O. Box 1821
Hyattsville, MD 20788-0821