June 11, 2019

TO: David S. Ferriero
                Archivist of the United States

FROM: James Springs
                Inspector General

SUBJECT: *Audit of NARA's Oversight of Electronic Records Management in the Federal Government*
                OIG Audit Report No. 19-AUD-10

This memorandum transmits the results of our final report entitled, *Audit of NARA's Oversight of Electronic Records Management in the Federal Government.* We have incorporated the formal comments provided by your office.

The report contains ten recommendations, which are intended to strengthen management and oversight controls over electronic records management in the Federal government, and to ensure records of permanent historical value are archived for future use. Your office concurred with all of the recommendations. Based on your June 3, 2019 response to the final draft report, we consider all the recommendations resolved and open. Once your office has fully implemented the recommendations, please submit evidence of completion of agreed upon corrective actions so that recommendations may be closed.

As with all OIG products, we determine what information is publically posted on our website from the attached report. Consistent with our responsibility under the *Inspector General Act, as amended,* we may provide copies of our report to congressional committees with oversight responsibility over the National Archives and Records Administration.

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

Attachment

cc: Debra Wall, Deputy Archivist of the United States
       William Bosanko, Chief Operating Officer
       Chris Naylor, Deputy Chief Operating Officer
       Micah Cheatham, Chief of Management and Administration
       Jay Trainer, Executive for Agency Services
       Ann Cummings, Executive for Research Services
       Laurence Brewer, Chief Records Officer
       Kimm Richards, Accountability

United States House Committee on Oversight and Government Reform
Senate Homeland Security and Governmental Affairs Committee
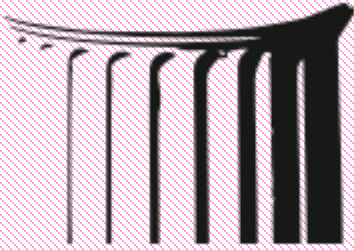
Office *of* INSPECTOR GENERAL
NATIONAL ARCHIVES

Audit of NARA's Oversight of Electronic Records Management in the Federal Government

June 11, 2019

OIG Audit Report No. 19-AUD-10

Table of Contents

National Archives and Records Administration

Executive Summary

Audit of NARA's Oversight of Electronic Records Management in the Federal Government

Why Did We Conduct This Audit?

Under the Federal Records Act, the National Archives and Records Administration (NARA) is given general oversight responsibility for electronic records management (ERM) in the Federal government, including identifying and archiving records deemed to be of permanent value.

We performed this audit to determine whether (1) weaknesses identified in Office of Inspector General (OIG) Audit Report, *NARA's Oversight of Electronic Records Management in the Federal Government* (OIG Audit Report No. 10-04, April 2, 2010), still exists; (2) internal controls were adequate to meet the mission of electronic records management; (3) Federal electronic records were managed in accordance with Federal regulations intended to safeguard and preserve vital records; and (4) NARA has fully integrated a program structure with policies and procedures.

What Did We Recommend?

We made 10 recommendations to strengthen management and oversight controls over electronic records management in the Federal government, and to ensure records of permanent historical value are archived for future use. Management concurred with the 10 recommendations in this report, and in response, provided a summary of their proposed actions.

What Did We Find?

Although NARA made progress in implementing changes to address weaknesses previously identified in its electronic records management activities, the OIG found longstanding issues continue to exist and internal controls were still not adequate to ensure Federal agencies are transferring high valued Federal records to NARA as required to protect permanent Federal electronic records from loss or destruction. Specifically, we found NARA has not identified all Federal agencies subject to the FRA; the universe of scheduled electronic records accessioned into NARA holdings has not been adequately identified; NARA lacks an approach to adequately identify possible gaps in permanent electronic records scheduled accessions; and NARA's inspection of Federal agencies' record keeping programs and practices needs to be strengthened.

We attributed these conditions to NARA not effectively exercising its oversight authority; legacy permanent disposition authorities were not entered into NARA's tracking database timely; lack of communication between offices; use of antiquated data systems; NARA not exercising established controls; NARA's best practices not being codified; and inadequate strategic planning for NARA's inspections.

As a result, permanent electronic records are still at a significant risk of loss and destruction. These findings significantly affect NARA's ability to fulfill its statutory role as records manager for the Federal Government and adversely affects its mission of safeguarding and preserving essential and important records of the Federal Government and its strategic goal of "Make Access Happen."

NARA 101 Part 7, Agency Services Organization states the agency is tasked to lead records management throughout the Federal Government, with an emphasis on electronic records; and to assess the effectiveness of Federal records management policies and programs. In addition, NARA is responsible for promulgating Federal records management policies, procedures, regulations, and guidance on records creation, management, and disposition of records in all media.

These deficiencies combined represent a material weakness in electronic records management and will continue to have a negative impact unless improvements are made.

Summary of Recommendations

Material Weakness in Electronic Records Management

Number	Recommendation	Responsible Office
1	Recommend the Management Control Oversight Council consider reporting the Electronic Records Management deficiencies identified in the audit report as a material weakness under Federal Managers' Financial Integrity Act.	Chief Risk Officer and Executive for Agency Services

Finding 1: Federal Agencies Subject to the Federal Records Act Unknown

Number	Recommendation	Responsible Office
2	Create a complete authoritative list of all active Federal agencies, including but not limited to Departments, agencies, sub-agencies, and or components subject to the Federal Records Act. This list should be updated periodically.	Executive for Agency Services
3	Upon completion of Recommendation 2, include all active Federal agencies subject to the Federal Records Act in the annual Records Management Self-Assessment survey.	Executive for Agency Services

Finding 2: Universe of Scheduled Electronic Records Not Identified

Number	Recommendation	Responsible Office
4	Complete validation and data entry of the legacy permanent disposition authorities into ERA in a timely manner.	Executive for Agency Services
5	Until recommendation 4 is completed, review ERA and implement a plan to update CASPER to more accurately reflect all known active permanent electronic schedules to identify records overdue for transfer to NARA.	Executive for Research Services

Finding 3: Gaps in Permanent Electronic Records Scheduled Accessions

Number	Recommendation	Responsible Office
6	Review whether existing technology for identifying gaps in electronic record accessions is sufficient and if not request funding or identify another option to reasonably ensure permanent electronic records are identified, scheduled, and ultimately obtained by NARA.	Executive for Agency Services, in coordination with the Executive for Research Services

7	Update internal controls to reflect a measured and reasonable approach to reaching out to agencies with known overdue records.	Executive for Agency Services, in coordination with the Executive for Research Services

Finding 4: Federal Agencies Record Schedules are Outdated

Number	Recommendation	Responsible Office
8	Codify in CFR how often Federal agencies are required to review record schedules.	Executive for Agency Services
9	Contact Federal agencies currently using record schedules approved before January 1, 1990 and require the schedules be reviewed.	Executive for Agency Services

Finding 5: Inspections of Federal Agencies' Electronic Records Management Programs Needs Improvement

Number	Recommendation	Responsible Office
10	Develop a strategy to ensure annual inspections results are used to effectively mitigate threats and risk to federal agency electronic records activities.	Chief Records Officer

Background

The National Archives and Records Administration (NARA) serves as our nation's record keeper responsible for safeguarding the records from all three branches of the Federal government. NARA's records management role and responsibility is established through the Federal Records Act (FRA) of 1950, as amended. Under the FRA, NARA has oversight responsibility for Federal records management, including responsibility for identifying and archiving records the Archivist deems to be of permanent value. NARA is also responsible for providing oversight of records management throughout the Federal Government, including providing guidance and assistance to Federal agencies on the creation, maintenance, use, and disposition of government records. The relevant provisions of the FRA are largely codified in Title 44 of the United States Code (44 U.S.C). Under Title 44 U.S.C., the Archivist is responsible for promulgating standards, procedures, and guidelines with respect to records management; providing guidance and assistance to Federal agencies with respect to conducting records management studies or designating the heads of executive agencies to conduct such studies; and conducting inspections or surveys of the records and records management programs of Federal agencies. Title 44 also requires the head of each Federal agency to establish and maintain a records management program, which adequately complies with records management laws, and regulations.

In Office of Inspector General (OIG) Audit Report, *NARA's Oversight of Electronic Records Management in the Federal Government* (OIG Audit Report No. 10-04, dated April 2, 2010), we concluded internal controls were not adequate to protect permanent Federal electronic records from being lost. Specifically, NARA could not reasonably ensure permanent electronic records were adequately identified, maintained, and transferred to NARA in accordance with Federal regulations. Management concurred with our recommendations and agreed to take corrective actions to address the issues identified.

The prior audit report contained seven recommendations, which intended to help NARA in its efforts to ensure appropriate management and proper stewardship of the permanent electronic records of the Federal Government. NARA issued an action plan to address the recommendations in Fiscal Year (FY) 2013. When the OIG initiated this follow-up audit, three of the seven recommendations remained open, as actions taken by the agency were insufficient to close the open recommendations. Based on the results of this audit we determined of the three remaining open recommendations, one recommendation remained open, one was subsumed into recommendation 6 of this report, and the remaining recommendation was overcome by events and closed (See Appendix A).

Further, on November 28, 2011, *Presidential Memorandum - Managing Government Records*, added new requirements for managing government records and required the Office of Management and Budget (OMB) and the Archivist to release further guidance on managing government information and records. OMB Circular A-130, *Managing Information as a Strategic Resource* (July 27, 2016), establishes general policy for managing federal information including the management and preservation of federal government records.

OMB Memorandum 12-18, *Managing Government Records Directive* (August 24, 2012), created a records management framework and required agencies to take specific actions to reform records management policies and practices. The Directive also required that agencies eliminate paper and use electronic recordkeeping to the extent possible, applicable to all executive agencies and to all records. The Directive has a compliance deadline of December 31, 2019 for all Federal agencies to manage all permanent electronic records in an electronic format.

Research Services
Research Services - Electronic Records Division (RDE) is responsible for the accessions of electronic records into NARA. RDE collaborate and support other units of NARA in providing technical assistance to Federal agencies on creation, maintenance, transfer, and disposition of electronic records. In addition, they analyze requirements for accessioning, preservation, and access to electronic records; and evaluates options for satisfying requirements and implements best practices to maintain the integrity and authenticity of electronic records.
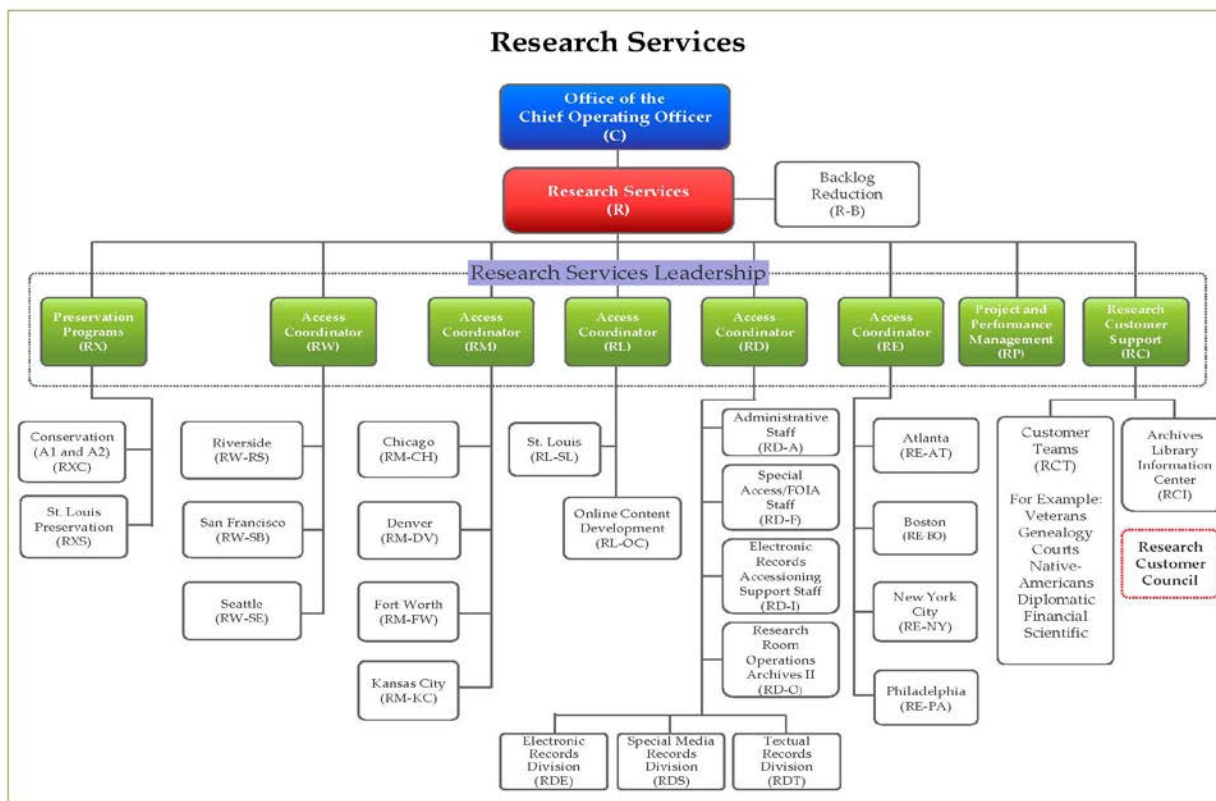
Agency Services

Office of the Chief Records Officer (AC) leads records management throughout the Federal Government, with an emphasis on electronic records, and assesses the effectiveness of Federal records management policies and programs. AC is responsible for promulgating Federal records management policies, procedures, regulations, and guidance on records creation, management, and disposition of records in all media. Also, they champion the critical importance of federal records management across the Federal Government through initiatives and communicate with executives and staff of the government; lead a program of agency inspections and surveys designed to improve agencies' appraisal, scheduling, and preservation of electronic records; determine compliance by agencies with statutory mandates and management requirements; and determine the effectiveness of agency records management programs.

Agency Services
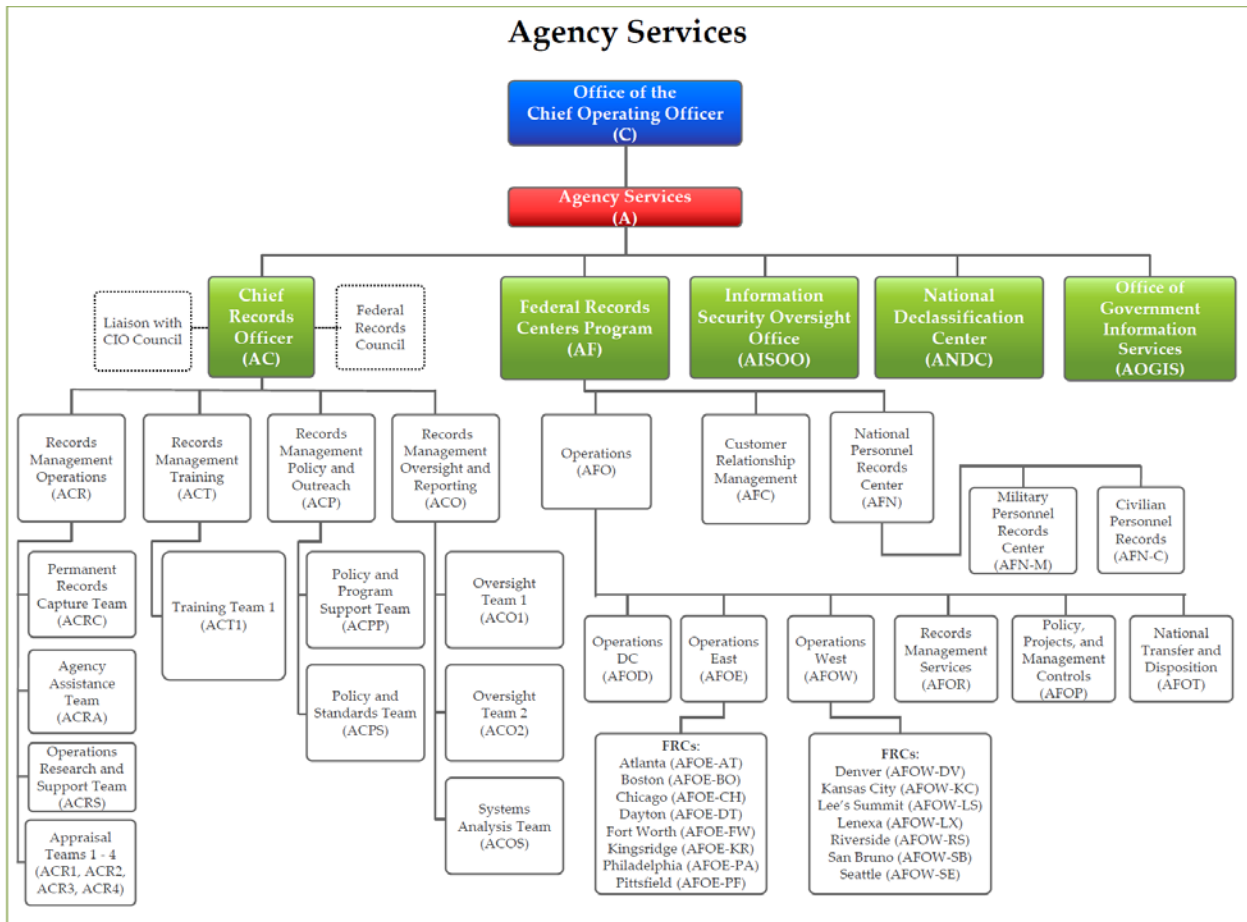
Objectives, Scope, Methodology

Objectives

The objectives of this audit were to determine whether (1) weaknesses identified in *NARA's Oversight of Electronic Records Management in the Federal Government* (OIG Audit Report No. 10-04, dated April 2, 2010), still existed; (2) internal controls were adequate to meet the mission of electronic records management; (3) Federal electronic records were managed by NARA in accordance with Federal regulations intended to safeguard and preserve vital records; and (4) NARA has fully integrated a program structure with policies and procedures necessary for addressing the challenges associated with the management of electronic records in a digital age.

Scope and Methodology

To accomplish our audit objective, we performed audit procedures at Archives II in College Park, Maryland with various NARA offices, including RDE and Agency Services - AC, Records Management Operations (ACR), Records Management Oversight and Reporting Program (ACO), and the Permanent Records Capture Team (ACRC). This audit was performed from January 2018 to June 2019[1].

Specifically, we performed the following.
- Reviewed applicable legislative history, laws, regulations, and other background information in order to acquire a working knowledge of NARA's Electronic Records Management (ERM) activities.
- Interviewed appropriate NARA officials to ascertain the internal controls in place over the ERM activities and to identify any corrective actions taken to address previous weaknesses.
- Assessed the internal controls identified to determine if the controls were sufficient to ensure that NARA can effectively manage and oversee Federal agencies' permanent electronic records.
- Assessed and documented significant changes to NARA's ERM activities to determine if corrective actions have mitigated the weaknesses and issues previously reported.
- Interviewed NARA officials to identify ERM systems being used to process and track electronic records scheduled and ultimately transferred to NARA.
- Interviewed appropriate NARA officials to determine the total number of active permanent disposition authorities[2] on file.

---

[1] This audit was impacted by the Government shutdown, and other unforeseen circumstances.

[2] The legal approval empowering an agency to transfer permanent records to NARA or to carry out the disposal of temporary records. Legal approval comes when the Archivist of the United States signs the authority.

- Analyzed NARA's database reports to determine the annual percentage of electronic records scheduled for transfer that are actually received by NARA.
- Reviewed Fiscal Year 2018 universe data on the total number of active permanent disposition authorities NARA had on file.
- Reviewed ERM training schedules, materials, and training records to determine if Federal agency record officers (ARO) completed NARA mandatory training.

Internal Controls

To assess internal controls relative to our objectives, we reviewed Agency Services Assurance Statement and Internal Control Reports for FY 2017 and FY 2018. Management reported there is reasonable assurance that the management controls in Agency Services were adequate and effective in ensuring that programs achieved their intended results. We assessed the control environment in accordance with Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government* and found the controls in place intended to protect permanent Federal electronic records from loss or destruction were ineffective.

Findings identified in *NARA's Oversight of Electronic Records Management in the Federal Government* (OIG Audit Report No. 10-04, dated April 2, 2010), indicated NARA's oversight of Federal ERM was a material weakness because NARA lacked reasonable assurance permanent electronic records were being properly maintained by Federal agencies and appropriately transferred into our custody. However, in October 2011, the Archivist of the United States, based on the recommendation of NARA's Management Control Oversight Council (MCOC), determined ERM to be a reportable condition. Management continued to address the ERM reportable condition through the MCOC and the ERM Federal Managers' Financial Integrity Act (FMFIA) action plan to remediate the challenges. In spite of these actions and based on the combined findings in this audit, a material weakness still exists.

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

The audit was conducted by Kurt Thompson, Senior Program Auditor.

Audit Results

Although NARA made progress in implementing changes to address weaknesses previously identified in its electronic records management activities, the OIG found longstanding issues continue to exist and internal controls were still not adequate to ensure Federal agencies are transferring high valued Federal records to NARA as required to protect permanent Federal electronic records from loss or destruction. Specifically, we found:

- NARA has not identified all Federal agencies subject to the FRA;
- the universe of scheduled electronic records accessioned into NARA holdings has not been adequately identified;
- NARA lacks an approach to adequately identify possible gaps in permanent electronic records scheduled accessions; and
- NARA's inspection of Federal agencies' record keeping programs and practices needs to be strengthened.

We attributed these conditions to:

- NARA not effectively exercising its oversight authority;
- legacy permanent disposition authorities were not entered into NARA's tracking database timely;
- lack of communication between offices;
- use of antiquated data systems;
- NARA not exercising established controls;
- NARA's best practices not being codified; and
- inadequate strategic planning for NARA's inspections.

As a result, permanent electronic records are still at a significant risk of loss and destruction. These findings significantly affect NARA's ability to fulfill its statutory role as records manager for the Federal Government and adversely affects its mission of safeguarding and preserving essential and important records of the Federal Government and its strategic goal of "Make Access Happen."

NARA 101 Part 7, Agency Services Organization states the agency is tasked to lead records management throughout the Federal Government, with an emphasis on electronic records; and to assess the effectiveness of Federal records management policies and programs. In addition, NARA is responsible for promulgating Federal records management policies, procedures, regulations, and guidance on records creation, management, and disposition of records in all media.

These deficiencies combined represent a material weakness in electronic records management

and will continue to have a negative impact unless improvements are made.

Recommendation

We recommend the Chief Risk Officer and Executive for Agency Services:

Recommendation 1: Recommend the Management Control Oversight Council consider reporting the Electronic Records Management deficiencies identified in the audit report as a material weakness under Federal Managers' Financial Integrity Act.

Management Response

The Chief Risk Officer and the Executive for Agency Services will determine whether to raise the deficiencies identified in the audit report to the MCOC for Consideration as a FMFIA weakness and related tracking.

Target Completion Date: December 31, 2019

OIG Analysis

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

Finding 1. Federal Agencies Subject to the Federal Records Act Unknown

NARA has not identified all Federal agencies subject to the FRA and therefore cannot ensure agencies are compliant. This occurred because NARA is not effectively exercising its oversight authority per 44 U.S.C. Chapter 29. As a result, NARA has limited assurance electronic records created by the Federal government of historical or other value are preserved as required.

Pursuant to 44 U.S.C Chapter 29, NARA has oversight authority over agencies that meet the definition of a "Federal agency" per the FRA. A Federal agency is defined as an executive agency or any establishment in the legislative or judicial branch of the Government (except the Supreme Court, the Senate, the House of Representatives, and the Architect of the Capitol and any activities under the direction of the Architect of the Capitol). An executive agency is an executive department or independent establishment in the executive branch of the Government and any wholly owned Government corporation.

NARA made significant improvements to obtain Government wide information on agencies electronic records management efforts and compliance in response to OIG's prior audit findings and recommendations. In FY 2011, NARA established the Records Management Oversight

Section (ACPO)[3] of the Policy Analysis and Enforcement Division of the Office of the Chief Records Officer. The ACPO team is dedicated to ensuring effective oversight of Federal agencies' records management activities, including management of electronic records. NARA also started to interact with Federal entities at various levels, including department, agency, and program level record officers. NARA monitors Federal agencies' records management programs by conducting a coordinated Records Management Self-Assessment (RMSA) survey annually. A total of 262 Federal agencies received the RMSA questionnaire in FY 2017 and 259 agencies submitted their findings to NARA. We commend NARA for making improvements and directing agencies to perform these critical assessments. However, the number of agencies that receive the RMSA annually is not reflective of the total number of agencies that are subject to the FRA.

It has been widely reported that no Federal entity knows how many Federal agencies exist.[4] For example, *Forbes* reported in July 2017 that FOIA.gov lists 78 independent executive agencies and 174 components of the executive department while the United States Government Manual lists 96 independent executive units and 220 components. USA.gov lists 137 independent executive agencies and 268 units in the Cabinet. In FY 2018, *The Best Places to Work in the Federal Government* ranks a total of 488 agencies and subcomponents and the Federal Register reports there are at least 441 Federal agencies. While these entities do not share a standard definition for what is a Federal agency, the disparity shows there is confusion on the issue. For example, the Federal Register lists every sub-department or section of the Department of Defense as a separate agency (Department of the Air Force, Defense Logistics Agency, etc.). Even with the lack of clarity, NARA did not perform an analysis to complete an authoritative list of all government agencies subject to FRA. Without an authoritative list, NARA is still limited in their understanding of the current state of the Federal ERM compliance and risks not scheduling[5] and accessioning[6] all Federal records. For example, based on the Federal Register's reported list of 441 Federal agencies, some agencies may not have an approved record schedule

---

[3] As of October 2015, ACPO became Records Management Oversight and Reporting (ACO) Program.

[4] "*How Many Federal Agencies Exist? We Can't Drain the Swamp Until We Know*" (Forbes, July 5, 2017), "*Nobody Knows How Many Federal Agencies Exist*" (Competitive Enterprise Institute, August 26, 2015), and "*Official Time: What Everyone Agrees on It What They Don't Know*" (Federal News Network, May 24, 2018).

[5] The process of determining and recording in a records schedule the appropriate retention period and ultimate disposition of a series.

[6] The act and procedures involved in a transfer of legal title and the taking of records into the physical custody of NARA.

on file with NARA,[7] and may be out of compliance with FRA resulting in the possibility that records of historical value could be destroyed. [8]

NARA officials agreed with this finding and explained that no Federal agency has primary responsibility for maintaining an authoritative list of the total number of agencies within the Federal government. The officials also acknowledged they did not conduct an analysis of which Federal agencies are subject to FRA. The OIG agrees that there is no single authoritative source listing all Federal agencies. However, if NARA is not proactive in leading the effort to identify all Federal agencies subject to the FRA, it will be unable to fulfill its core mission as the nation's record keeper and to make access happen by delivering increased volumes of electronic records to the American people.

Recommendations

We recommend the Executive for Agency Services:

Recommendation 2: Create a complete authoritative list of all active Federal agencies, including but not limited to Departments, agencies, sub-agencies, and or components subject to the Federal Records Act. This list should be updated periodically.

Management Response

In March 2019, Agency Services created and issued the AC Uniform Names List of Active Federal Entities Subject to the Federal Records Act (aka Agency Names List) and issued standard operating procedures (SOPs) to staff for maintaining and periodically updating the list. AC will review the list of sources identified in the SOP and evaluate whether there are other sources for clarifying whether an entity is a federal agency.

Target Completion Date: January 31, 2020

OIG 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.

---

[7] Pursuant to 44 U.S.C. §3103, an agency may transfer inactive, temporary, or permanent records created to an archival records center after its head determines it is economical or efficient; and after the Archivist approves a records transfer. NARA regulations require that after 30 years, most agency records be disposed of or, if permanent, the value is transferred to NARA for permanent preservation.

[8] Congressional Research Service Common Questions About Federal Records and Related Agency Requirements (dated February 2, 2015) reported the Federal Records Act of 1950 (44 U.S.C. Chapters 21, 29, 31 and 33) as amended, required federal agency employees to determine whether information created qualified as a federal record and governs how federal records are to be collected, retained, and eventually either destroyed or provided to NARA for permanent archiving.

Recommendation 3: Upon completion of Recommendation 2, include all active Federal agencies subject to the Federal Records Act in the annual Records Management Self-Assessment survey.

<u>Management Response</u>

The Office of the Chief Records Officer will use the AC Uniform Names List of Active Federal Entities Subject to the Federal Records Act for all future RMSAs, beginning in 2020.

Target Completion Date: January 31, 2020

<u>OIG Analysis</u>

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.

Finding 2.   Universe of Scheduled Electronic Records Not Identified

We found NARA has not tracked electronic records accessioned into NARA holdings and disposition authorities to accurately identify the complete universe of scheduled electronic records. This occurred because legacy permanent disposition authorities[9] have not been completely entered into Electronic Records Archives (ERA) for tracking and there was a lack of communication and coordination between ACRC and RDE. As a result, NARA is unable to account for all active and valid permanent disposition authorities, and has limited assurance historical records are accessioned into NARA holdings as required by the Archivist.

GAO's *Standards for Internal Control in the Federal Government* stress that management should internally communicate necessary quality information throughout the entity across all reporting lines to enable personnel to perform key roles in achieving objectives, address risk, and support the internal control systems.

The ACO, under the AC, is responsible for monitoring compliance with records management regulations and implementation of NARA policies, guidance and other records management practices used by Federal agencies. AC plans and implements in coordination with other offices, as necessary, a program to address issues raised by Federal electronic records, including developing, coordinating, and monitoring programs to ensure records are created, identified, and preserved for access in the course of current operations of Federal agencies. NARA 101 Part 7, *NARA Organization and Delegation of Authority*, also requires ACRC to collaborate with staff in Appraisal and Agency Assistance, the Federal Records Centers Program, and Research Services to identify and transfer eligible permanent records.

In response to the OIG's prior audit findings and recommendations, NARA believed that by April 21, 2013 ERA would become the authoritative source for all permanent disposition authorities covering all records, including electronic records. AC implemented a business decision to use ERA as the primary vehicle for gaining accountability to document decades of approved permanent disposition authorities. The goal was to make ERA the most up-to-date source of all permanent disposition authorities. Since that time, ACRC has been conducting research on superseded authorities and data entry for over 23,000 potential legacy permanent disposition authorities, but this work is at least two years away from completion. To date, NARA has reviewed a large portion of the authorities and entered approximately 60% into ERA for tracking. Until this task is completed, NARA cannot ensure accountability for all active permanent disposition authorities. For example, two NARA offices with primary responsibility

[9] Paper requests for records disposition authority created by an agency and approved by NARA prior to the mandatory implementation of ERA. These schedules describe the federal records and establish a period for retention by the agency, and provide mandatory instructions for disposition of records no longer needed for current government business.

for tracking permanent disposition authorities and electronic records had not reconciled the total number of active permanent disposition authorities. The OIG identified differences in the authorities tracked by the two offices. Specifically, RDE tracked approximately 3,000 authorities, while ACRC reviewed over 23,000 potential legacy authorities. Further, the two offices did not communicate or coordinate their individual efforts to complete a comprehensive list of all active permanent disposition authorities.

A NARA official explained ACRC and RDE were aware of known gaps[10] that would require their individual and mutual efforts for the near future and identifying every gap had not yet been a priority. The officials also stressed that even when research is complete and a comprehensive list of active permanent disposition authorities is documented, NARA would still be unable to identify the complete universe of electronic records scheduled for accessioning. This is due to schedules that do not necessarily indicate the media-type of records and NARA not having the ability to glean this information from their existing data sources. The officials further stated that additional resources are needed to consolidate all electronic records in RDE and to establish an Accessioning Branch proposed by Research Services. However, additional resources were not formally requested. In addition, ERA does not have the capability to maintain record series-level data[11] on what NARA should be receiving as recent scheduling initiatives have resulted in less series-level information regarding electronic records being identified on record schedules, resulting in less knowledge about which series of electronic records NARA should be receiving.

The OIG is aware of limitations with NARA's resources, data sources, and technology (see finding 3), and that permanent disposition authorities tracked by RDE are strictly electronic records while permanent disposition authorities tracked by ACRC are all forms of media, including electronic records. However, without a complete comprehensive list of active permanent disposition authorities, NARA has limited knowledge of the electronic records they should receive from federal agencies and is not able to ensure all historical records are accessioned into NARA holdings timely. Further, NARA may also be unable to plan for the space needed to store permanent records received.

__Recommendations__

We recommend:

> **Recommendation 4:** The Executive for Agency Services complete validation and data entry of the legacy permanent disposition authorities into ERA in a timely manner.

> <u>Management Response</u>

---

[10] Records eligible for transfer by Federal agencies, which NARA has not yet received.
[11] A group of records arranged according to a filing system or kept together because they relate to a particular subject or function, result from the same activity, document a specific type of transaction, exist in the same media format, or have some other type of relationship.

The Office of the Chief Records Officer will review remaining record groups and enter the legacy permanent disposition authorities determined to be appropriate into ERA (i.e., authorities that are not superseded and not for one-time and already transferred records).

Target Completion Date: July 31, 2020

<u>OIG Analysis</u>

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

Recommendation 5:   Until recommendation 4 is completed, the Executive for Research Services review ERA and implement a plan to update CASPER to more accurately reflect all known active permanent electronic schedules to identify records overdue for transfer to NARA.

<u>Management Response:</u>

On February 26, 2019, the Electronic Records Division determined that CASPER was officially up-to-date. The Electronic Records Division will update CASPER with any legacy permanent disposition authorities for electronic records and will continue to update CASPER with any new disposition authorities. Research Services will provide this analysis, as well as Standard Operating Procedures to review the Recently Approved and Updated Schedules webpage and add the newly approved permanent items for electronic records to the CASPER database.

Target Completion Date: December 31, 2020

<u>OIG Analysis</u>

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

Finding 3.   Gaps in Permanent Electronic Records Scheduled Accessions

We found NARA still[12] faces constraints in identifying gaps in scheduled permanent electronic records.   This occurred because NARA's mechanism in place is inadequate and needs to be modernized with technological improvements to link permanent disposition authorities with accession holdings more efficiently. As a result, NARA has no assurance records of historical value are not lost or destroyed. If these records are lost, NARA cannot fulfill its core mission to "Make Access Happen." The President's Management Agenda (March 2018) put emphasis on Federal Information Technology (IT) modernization that focus on delivering better service to the public including agencies building a modern IT workforce by recruiting, reskilling, and retaining professionals able to help drive modernization with up-to-date technology.

In response to OIG's prior audit findings and recommendations, NARA believed it had an adequate methodology in place for identifying gaps in electronic records accessions. However, we found NARA's methodology to be antiquated and ineffective. NARA has been implementing the same methodology for identifying gaps in electronic record accessions for over 20 years. NARA is currently trying to identify gaps manually and with two systems that do not interface. RDE staff maintain a database called the Comprehensive Accounting of Scheduled Permanent Electronic Records (CASPER). The database is NARA's authoritative list of all known permanent disposition authorities that pertain to electronic records. However, the database only contains information on approximately 3,000 permanent electronic records. CASPER is populated manually by reviewing all approved record schedules and associated appraisal memoranda. RDE staff generate an Accessions Management Information System (AMIS) report each month on accessions received. The data is mapped to CASPER. Possible gaps are then identified by comparing accessions received and tracked in AMIS against CASPER by attempting to link the data in the two systems by either the record schedules job number plus the item numbers.

Although CASPER has the capability to generate monthly "Promise" reports identifying overdue records based on the comparison of the data in the two systems, NARA did not run this monthly report. When the OIG requested NARA provide the Promise reports for last three fiscal years, RDE staff was unable to provide them. NARA officials stated that there is no requirement to generate the Promise reports monthly or on a regular basis. In addition, they indicated the reports were not for operational purposes. The OIG found the statement to be contradictory because even though this may not be a requirement, NARA provided OIG with an action plan to

---

[12] In April 2010, NARA OIG reported NARA's process for identifying "Gaps" in scheduled permanent electronic records needed strengthening. OIG recommended that the "Assistant Archivist for Records Services should ensure the development and application of a methodology for adequately identifying gaps in electronic record accessions. The methodology should reasonably ensure permanent electronic records were identified, scheduled, and ultimately obtained by NARA."

close open recommendations of the prior audit and reported that the Promise report is the mechanism used to identify gaps in accessions of permanent electronic records. Currently, the Promise report is the only tool that NARA has to identify electronic records not received by NARA. In absence of this report, NARA has no way of ensuring Federal agencies transferred permanent electronic records as scheduled.

A Promise report was provided to OIG on April 16, 2018 and showed NARA had over 18,000 transfers[13] of electronic records that were overdue. In FY 2017, NARA only received about 6 percent [14] of scheduled transfers from Federal agencies. The OIG learned RDE staff did not contact the federal agencies to inquire about the FY 2017 overdue records. NARA officials indicated prior to FY 2013, RDE had an outreach program to seek overdue records transfers, but due to staffing reductions management focused on processing. [15] Thus, there has been very little effort by NARA to locate these missing transfers in over six years.

Even if the Promise reports were generated monthly, NARA's methodology for identifying gaps remain antiquated and must be modernized to efficiently link permanent disposition authorities with accessioned holdings for tracking purposes. Further, NARA does not have a centralized database. The agency currently uses various technological systems that do not interface to track scheduled permanent electronic records and accessions. Lack of a centralized database and systems interface does not allow NARA to effectively track approved record schedules with the final disposition of electronic records into their holdings. For example, CASPER does not interface with AMIS or ERA. Additionally, ERA does not have an electronic records format field for the legacy authorities. Recent scheduling initiatives such as "big bucket & media neutral"[16] scheduling have resulted in broad schedules with less series-level information about electronic records individually identified and captured in CASPER. As previously mentioned the universe of scheduled electronic records have not been clearly identified and a large percentage of legacy permanent disposition authorities are not entered into ERA for tracking.

NARA officials agreed the current methodology is antiquated and explained that over time, ERA will become the authoritative source for permanent authority items covering all records and

---

[13] The process of moving records from a federal agency to NARA.

[14] For FY 2017 RDE tracked 1,641 active permanent disposition authorities in CASPER and received only 100 record transfers.

[15] Records are processed at the point where a researcher can discover their existence (i.e. records have a description in the National Archives Catalog) and either have access to the original records or copies/digital surrogates promptly or have a prompt explanation of why we must withhold them.

[16] A flexible schedule in which disposition instructions applied against a body of records grouped at a level of aggregation greater than the traditional file series/electronic system and organized along a specific program area, functional line, or business process. The goal of this type of flexible scheduling is to provide for the disposition of records at a level of aggregation that best support the business needs of agencies, while ensuring the documentation necessary to protect legal rights and guarantee government accountability.

reducing the need for CASPER. With additional resources, ERA could be improved to be the repository for series level information tied to records in NARA holdings. This would allow staff access to detailed information about gaps in their holdings and provide a better understanding of what NARA should be receiving. NARA officials also stated it was important to point out that a significant amount of agency financial resources would be required to modernize this process and additional funding is currently unavailable. However, additional resources were not formally requested.

NARA is the nation's record keeper and it will continue to have a substantial amount of permanent electronic records scheduled to be accessioned. However, until NARA modernizes its method of identifying gaps in scheduled electronic records accessions, it will continue to struggle to fulfill its core mission to "Make Access Happen."

Recommendations

We recommend:

Recommendation 6: The Executive for Agency Services, in coordination with the Executive for Research Services, review whether existing technology for identifying gaps in electronic record accessions is sufficient and if not request funding or identify another option to reasonably ensure permanent electronic records are identified, scheduled, and ultimately obtained by NARA.

Management Response

The Office of the Chief Records Officer, in conjunction with Research Services, will review the upcoming enhanced capabilities in ERA 2.0 for Transfer Plans and reporting and determine the funding status of these enhanced capabilities and their potential for facilitating the identification of gaps in electronic records. Agency Services and Research Services will prepare a memo for the Chief Operating Officer, with options to facilitate the identification of gaps in electronic records, including potential requests for additional funding, if necessary.

Target Completion Date: December 31, 2020

OIG Analysis

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

Recommendation 7: The Executive for Research Services, in coordination with the Executive for Agency Services, update internal controls to reflect a measured and reasonable approach to reaching out to agencies with known overdue records.

Management Response

Research Services' Electronic Records Division, in coordination with Agency Services, established a Targeted Accessioning Group (TAG) to increase the number of transfers of permanent electronic records by 10 percent, with a focus on outreach to agencies with numerous overdue items. Research Services will provide the TAG list of assigned agencies, outreach strategy, quarterly narratives, and results and time tracking spreadsheet. Research Services has updated the Internal Controls Program for Accessioning-Electronic Records to reflect this initiative and will provide copies of reports.

Target Completion Date: September 30, 2019

<u>OIG Analysis</u>

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

Finding 4. Federal Agencies Record Schedules are Outdated

NARA is not effectively exercising its oversight authority per 44.U.S.C. §2107 to ensure that Federal Agencies update their records schedules timely. This occurred because NARA has not codified in regulations any required timeframes for when Federal agencies record schedules are to be updated. As a result, Federal Agencies are still using old schedules approved in the 1980's and 1990's that do not reflect current business practices. Accordingly, NARA has limited assurance it is timely preserving electronic records as required.

According to 44 U.S.C §2107, when it appears to the Archivist to be in in the public interest, the Archivist may direct and effect the transfer of Federal agencies' records that have sufficient historical or other value to warrant continued preservation by the United States Government. The records are to be preserved by NARA, as soon as practicable, and at a time mutually agreed upon by the Archivist and the head of that Federal agency no later than thirty years after the records were created or received by that agency. However, the agency may keep the records if the agency has certified in writing to the Archivist that the records must be retained in agency custody for use in the conduct of its regular business.

We found agencies are still using old schedules approved in the 1980s and 1990s that do not reflect how the Federal agencies are currently doing business. As previously reported, NARA has identified over 23,000 potential legacy permanent disposition authorities to be entered into ERA, and NARA has limited knowledge of which authorities are active. NARA has acknowledged the issue and has begun taking corrective action. A multi-year project to identify and enter all permanent disposition authorities into ERA is underway. We commend NARA for identifying the issue and conducting this important project. However, NARA has not provided formal timeframes or written guidance on how often record schedules are to be updated. Instead, as a best practice, NARA encourages agencies to update record schedules periodically. Since this best practice is not codified, federal agencies may choose whether to adhere to it.   Until the Code of Federal Regulations (CFR) is updated to ensure Federal agencies are required to review and update their record schedules based on prescribed timeframes this issue will continue to exist.

NARA officials agreed that Title 36 of the CFR does not provide or require a timeframe for when Federal agencies are to update records schedules. However, they indicated the decision was not an oversight, but deliberate. Officials decided to leave out specific criteria that clearly required agencies to update record schedules based on prescribed timeframes because they believed current regulations identified in detail the conditions under which an agency should update record schedules. NARA officials believe the current regulations as written, is more relevant in determining when an authority becomes obsolete. In addition, NARA excluded timeframe requirements from the CFR because the agency believed old authorities could still be

valid and timeframe requirements would invalidate many authorities that could still reflect agencies' business practices.

In addition, NARA contends electronic records may be covered by media neutral or big bucket schedules only if the description is broad enough to appropriately cover implementation or upgrades to technological systems. However, the OIG notes, big bucket and media neutral schedules are recent scheduling initiatives with guidance for the flexible schedules issued in NARA Bulletin No. 2005-05 (April 2005). Many of the legacy authorities in question date back well over 30 years. Without updated record schedules, NARA cannot be certain these authorities accurately reflect agencies current business practices, especially given changes and improvements in technology over the past three decades.

Recommendations

We recommend the Executive for Agency Services:

> **Recommendation 8:** Codify in CFR how often Federal agencies are required to review record schedules.
>
> Management Response
>
> The Office of the Chief Records Officer will work with the NARA Regulations Liaison Officer to codify in the CFR a timeframe in which Federal agencies are required to review records schedules.
>
> *Target Completion Date: December 31, 2020*
>
> OIG Analysis
>
> We consider NARA's proposed actions responsive to our recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above.

> **Recommendation 9:** Contact Federal agencies currently using record schedules approved before January 1, 1990 and require the schedules be reviewed.
>
> Management Response
>
> The Office of the Chief Records Officer will notify agencies via an AC Memorandum to Records Officers that they will be required to review all agency-specific schedules approved prior to 1990 to determine which items need to be rescheduled per the criteria outlined in CFR 1225.22. The Office of the Chief Records Officer will require agencies to report on the status of this activity when we send out the RMSA in 2020.
>
> *Target Completion Date:* September 30, 2020

OIG Analysis

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

Finding 5.   Inspections of Federal Agencies' Electronic Records Management Programs Needs Improvement

NARA is not conducting inspections commensurate with the volume of records held by federal agencies. NARA also has not identified a strategy to determine the total number of inspections NARA needs to do each year to adequately address the total population of Federal agencies records programs and ensure risks and threats are identified and mitigated. As a result, NARA has limited assurance Federal agencies ERM programs are performing as intended.

Under Title 44 U.S.C. Chapter 29, the Archivist is responsible for providing guidance and assistance to Federal Agencies with respect to ensuring the proper disposition of Federal records; conducting records management studies or designating the heads of executive agencies to conduct such studies; and conducting inspection or surveys of the records and records management programs of Federal Agencies. Other guidance and best practices suggest that in order to make risk management more effective, management should establish levels of controls for processes commensurate with the perceived threat and risk exposure.

In part due to the response to the OIG's prior audit findings and recommendations, NARA made significant improvements to conduct agency records management inspections to obtain Government wide information on agencies ERM efforts and compliance. NARA began regular inspections of agency records management programs in FY 2010.   In FY 2011 NARA created the ACPO, a small staff that started inspections to analyze agencies management of electronic records. NARA continued the RMSA and implemented additional means to validate the self-reported data. In FY 2016, NARA reorganized ACPO and expanded it into ACO. When fully staffed ACO has 14 employees that conduct formal inspections each year.

We commend NARA for making the improvements to address the issues identified in the prior audit report. However, NARA did not have a risk assessment or a strategy to conduct inspections commensurate with the scale of risk. For example, NARA conducted an average of five formal inspections per year dating back to FY 2015. This represents about 1.6% of the approximate 300 agencies that respond to the RMSA each year. At this rate, it would take NARA 60 years to conduct inspections of the 300 Federal agencies that self-report annually. As previously reported, NARA has not clearly defined the total number of Federal agencies that are subject to the FRA (see Finding 1) and at a minimum, the annual inspections only represent approximately 1% of the Federal agencies that may be subject to the FRA. It would take NARA an additional 28 years to complete inspections of the 441 Federal agencies reported by the Federal Register.

NARA officials agreed with this finding, but stated that NARA is not required to conduct inspections of every agency. OIG agrees with that assessment. However, Title 44 U.S.C 294(c)

(7) and 2906 state that the Archivist has the responsibility to conduct inspections or surveys of Federal agencies records, management programs and practices in order to render recommendations for improvement in agencies record management practices and programs. Until NARA identifies a strategy to determine the total number of agencies to be inspected annually to adequately represent the total population of Federal agencies records programs and ensure risks and threats are communicated and mitigated, the Agency will continue to have limited assurance Federal agencies ERM activities are performing as intended, and records of historical value are accessioned into NARA holdings.

Recommendation

We recommend the Chief Records Officer:

Recommendation 10: Develop a strategy to ensure annual inspections results are used to effectively mitigate threats and risk to federal agency electronic records activities.

Management Response

The Office of the Chief Records Officer will continue to conduct an annual assessment of agency data received through various oversight activities (inspections, assessments, system audits, and annual reporting) to identify threats and risks to inform AC work priorities. The Office of the Chief Records Officer will develop and transmit to federal agencies a semiannual report highlighting key findings, best practices, and lessons learned from oversight activities (e.g., inspections, assessments, system audits, and annual reporting).

Target Completion Date: May 29, 2020

OIG Analysis

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

Appendix A – Prior Recommendations

The status of the recommendations from *NARA's Oversight of Electronic Records Management in the Federal Government* (OIG Audit Report No. 10-04, April 2, 2010).

Rec. No.	Recommendation Text	Status
1	The Archivist of the United States (N) should: (a) Fully exercise the authority and responsibilities for records management provided him under the law. If current law does not adequately support the exercise of authority and responsibilities in furtherance of NARA's mission, the Archivist should take appropriate action. (b) Identify and request the resources necessary to adequately accomplish NARA's mission.	Closed
2	The Archivist of the United States should consider using the authority given to him under title 44 of the United States Code to direct Federal agencies to perform assessments of their electronic records management programs based on requirements contained in 36 CFR Part 1236. Preferably such an assessment would be conducted by an independent body such as the OIG of each agency. If it is not conducted by a sufficiently independent body, NARA should develop a methodology for adequately verifying results. This effort should be undertaken in the near future in order to provide NARA with baseline information on electronic records management throughout the Federal Government to better inform NARA's actions going forward.	Closed
3	The Archivist of the United States should ensure NARA establishes a strategy for consistently and systematically monitoring compliance with electronic records regulations and guidance throughout the Federal Government.	Closed
4	The Assistant Archivist for Records Services, Washington D.C. (NW) should ensure NARA's strategy for monitoring and evaluating Federal agency compliance with electronic records management regulations and guidance results in adequate identification and mitigation of risks to permanent electronic records. If agencies do not take actions which adequately mitigate risks in a timely manner the Archivist should use the authority provided to him under 44 U.S.C. Chapter 21 to report the matter to the President and the Congress.	Closed
5	The Assistant Archivist for Records Services, Washington D.C. should ensure development of controls to adequately monitor agency scheduling of electronic records in an effort to reasonably ensure electronic records/systems are scheduled in a timely manner and therefore provide a reasonably accurate reflection of the universe	Open
6	The Assistant Archivist for Records Services, Washington D.C. should ensure a methodology for verifying the accuracy/completeness of Federal agency responses to electronic records scheduling requirements resulting from the E-Government Act of 2002	Closed - Overcome By Events
7	The Assistant Archivist for Records Services, Washington D.C. should ensure development and application of a methodology for adequately identifying gaps in electronic record accessions. This methodology should reasonably ensure permanent electronic records are identified, scheduled, and ultimately obtained by NARA	Will be subsumed into Rec 6 (see page 22)

Appendix B – Acronyms

Acronym	Definition
AC	Agency Services - Office of the Chief Records Officer
ACO	Agency Services - Records Management and Reporting Program
ACPO	Agency Services - Records Management and Oversight Section
ACR	Agency Services - Records Management Operations
ACRC	Agency Services - Permanent Records Capture Team
AMIS	Accessions Management Information System
ARO	Agency Record Officers
CASPER	Comprehensive Accounting of Scheduled Permanent Electronic Records
CFR	Code of Federal Regulations
ERA	Electronic Records Archives
ERM	Electronic Records Management
FMFIA	Federal Managers' Financial Integrity Act
FRA	Federal Records Act
FY	Fiscal Year
GAO	Government Accountability Office
IT	Information Technology
MCOC	Management Control Oversight Council
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
RDE	Research Services - Electronic Records Division
RMSA	Records Management Self-Assessment
U.S.C.	United States Code

Appendix C – Management Response

NATIONAL ARCHIVES

Date:	3 June 2019
To:	James Springs, Inspector General
From:	David S. Ferriero, Archivist of the United States
Subject:	Action Plan to OIG Report 19-AUD-10, *NARA's Oversight of Electronic Records in the Federal Government*

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 the 10 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
RECORDS ADMINISTRATION
8601 ADELPHI ROAD
COLLEGE PARK, MD 20740-6001
www.archives.gov

Action Plan Response to OIG Report 19-AUD-10,
NARA's Oversight of Electronic Records Management in the Federal Government

Recommendation 1: We recommend the Chief Risk Officer and Executive for Agency Services recommend the Management Control Oversight Council consider reporting the Electronic Records Management deficiencies identified in the audit report as a material weakness under Federal Managers' Financial Integrity Act.

Planned Action: The Chief Risk Officer and the Executive for Agency Services will determine whether to raise the deficiencies identified in the audit report to the MCOC for consideration as a FMFIA weakness and related tracking.

Target Completion Date: December 31, 2019

Recommendation 2: We recommend the Executive for Agency Services create a complete authoritative list of all active Federal agencies, including but not limited to Departments, agencies, sub-agencies, and or components subject to the Federal Records Act. This list should be updated periodically.

Planned Action: In March 2019, Agency Services created and issued the AC Uniform Names List of Active Federal Entities Subject to the Federal Records Act (aka Agency Names List) and issued standard operating procedures (SOPs) to staff for maintaining and periodically updating the list. AC will review the list of sources identified in the SOP and evaluate whether there are other sources for clarifying whether an entity is a federal agency.

Target Completion Date: January 31, 2020

Recommendation 3: We recommend the Executive for Agency Services, upon completion of Recommendation 2, include all active Federal agencies subject to the Federal Records Act in the annual Records Management Self-Assessment survey.

Planned Action: The Office of the Chief Records Officer will use the AC Uniform Names List of Active Federal Entities Subject to the Federal Records Act for all future RMSAs, beginning in 2020.

Target Completion Date: January 31, 2020

Recommendation 4: We recommend the Executive for Agency Services complete validation and data entry of the legacy permanent disposition authorities into ERA in a timely manner.

Planned Action: The Office of the Chief Records Officer will review remaining record groups and enter the legacy permanent disposition authorities determined to be appropriate into ERA (i.e., authorities that are not superseded and not for one-time, and already transferred records).

Target Completion Date: July 31, 2020

Recommendation 5: We recommend, until recommendation 4 is completed, the Executive for Research Services review ERA and implement a plan to update CASPER to more accurately reflect all known active permanent electronic schedules to identify records overdue for transfer to NARA.

Planned Action: On February 26, 2019, the Electronic Records Division determined that CASPER was officially up-to-date. The Electronic Records Division will update CASPER with any legacy permanent disposition authorities for electronic records and will continue to update CASPER with any new disposition authorities. Research Services will provide this analysis, as well as Standard Operating Procedures to review the Recently Approved and Updated Schedules webpage and add the newly approved permanent items for electronic records to the CASPER database.

Target Completion Date: December 31, 2020

Recommendation 6: We recommend the Executive for Agency Services, in coordination with the Executive for Research Services, review whether existing technology for identifying gaps in electronic record accessions is sufficient and if not request funding or identify another option to reasonably ensure permanent electronic records are identified, scheduled, and ultimately obtained by NARA.

Planned Action: The Office of the Chief Records Officer, in conjunction with Research Services, will review the upcoming enhanced capabilities in ERA 2.0 for Transfer Plans and reporting and determine the funding status of these enhanced capabilities and their potential for facilitating the identification of gaps in electronic records. Agency Services and Research Services will prepare a memo for the Chief Operating Officer, with options to facilitate the identification of gaps in electronic records, including potential requests for additional funding, if necessary.

Target Completion Date: December 31, 2020

Recommendation 7: We recommend the Executive for Research Services, in coordination with the Executive for Agency Services, update internal controls to reflect a measured and reasonable approach to reaching out to agencies with known overdue records.

Planned Action: Research Services' Electronic Records Division, in coordination with Agency Services, established a Targeted Accessioning Group (TAG) to increase the number of transfers of permanent electronic records by 10 percent, with a focus on outreach to agencies with numerous overdue items. Research Services will provide the TAG list of assigned agencies, outreach strategy, quarterly narratives, and results and time tracking spreadsheet. Research Services has updated the Internal Controls Program for Accessioning-Electronic Records to reflect this initiative and will provide copies of reports.

Target Completion Date: September 30, 2019

Recommendation 8: We recommend the Executive for Agency Services codify in CFR how often Federal agencies are required to review record schedules.

Planned Action: The Office of the Chief Records Officer will work with the NARA Regulations Liaison Officer to codify in the CFR a timeframe in which Federal agencies are required to review records schedules.

Target Completion Date: December 31, 2020

Recommendation 9: We recommend the Executive for Agency Services contact Federal agencies currently using record schedules approved before January 1, 1990 and require the schedules be reviewed.

Planned Action: The Office of the Chief Records Officer will notify agencies via an AC Memorandum to Records Officers that they will be required to review all agency-specific schedules approved prior to 1990 to determine which items need to be rescheduled per the criteria outlined in CFR 1225.22. The Office of the Chief Records Officer will require agencies to report on the status of this activity when we send out the RMSA in 2020.

Target Completion Date: September 30, 2020

Recommendation 10: We recommend the Chief Records Officer develop a strategy to ensure annual inspections results are used to effectively mitigate threats and risk to federal agency electronic records activities.

Planned Action: The Office of the Chief Records Officer will continue to conduct an annual assessment of agency data received through various oversight activities (inspections, assessments, system audits, and annual reporting) to identify threats and risks to inform AC work priorities. The Office of the Chief Records Officer will develop and transmit to federal agencies a semiannual report highlighting key findings, best practices, and lessons learned from oversight activities (e.g., inspections, assessments, system audits, and annual reporting).

Target Completion Date: May 29, 2020

Appendix D – Report Distribution List

Archivist of the United States
Deputy Archivist of the United States
Chief Operating Officer
Deputy Chief Operating Officer
Chief of Management and Administration
Executive for Agency Services
Executive for Research Services
Chief Records Officer
Accountability
United States House Committee on Oversight and Government Reform
Senate Homeland Security and Governmental Affairs Committee

OIG Hotline

To report fraud, waste, or abuse, please contact us:

Electronically: OIG Hotline Referral Form

Telephone:
301-837-3500 (Washington, D.C. Metro Area)
1-800-786-2551 (toll-free and outside the Washington, D.C. metro area)

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