



DATE: December 8, 2016

FROM: James E. Springs *James Springs*
Inspector General

TO: David S. Ferriero
Archivist of the United States

SUBJECT: NARA OIG Analysis of Management's Response and Action Plan to OIG Audit Report No. 17-AUD-06, Audit of NARA's Procurement Program

OIG Audit Report No. 17-AUD-06, Audit of NARA's Procurement Program was issued on November 15, 2016 without management's response. We received management's response to this report on December 7, 2016, attached. NARA concurs with the 26 recommendations in the audit, and in response, provided a summary of proposed actions to address each recommendation. We assessed management's response and action plan and consider NARA's proposed actions responsive to our report recommendations. All recommendations will remain open and resolved pending completion of the corrective actions.

Recommendation 1: CAO and SPE are structured to ensure alignment with NARA leadership and used by leadership as a business partner in supporting mission needs.

Management Response

NARA concurs with this recommendation. On October 3, 2016, NARA reorganized the Office of the Chief Acquisition Officer as a separate unit, to be headed by a new Senior Executive Chief Acquisition Officer. The new CAO position holds a place in the organizational structure that is equivalent to the CFO, CHCO, CIO, and Executive for Business Support. The CAO is supported by a Senior Procurement Executive, who reports directly to the CAO.

The functions and authorities of the CAO and SPE, enumerated in NARA Directive 101, include all authorities assigned to CAOs and SPEs in the Services Acquisition Reform Act (SARA, 41 U.S.C. § 1702). The functions of the CAO begin with the most significant role of the new position: "Provides advice and assistance to the Archivist of the United States in establishing appropriate business strategies to achieve the NARA mission and agency performance objectives..."

Target Completion Date: December 30, 2016

OIG Analysis

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

Recommendation 2: Archivist ensures the CAO responsibilities and title are assigned or delegated to an official who performs the duties of a CAO, including establishing an effective control environment, identifying acquisition objectives, and assessing the risks facing NARA as it seeks to achieve acquisition objectives.

Management Response

NARA concurs with this recommendation. On October 3, 2016, NARA Directive 101, *NARA Organization and Delegation of Authority*, assigns functions and specifically delegates the CAO authority established in SARA to a new and separate position that exclusively holds acquisition responsibilities. NARA 101 specifically delegates authority to advise and assist the Archivist of the United States in determining appropriate business strategies, and authority to monitor and evaluate the performance of acquisition activities and programs. The CAO functions enumerated in the NARA 101 include: developing acquisition strategies, implementing procurement initiatives, best practices, and reforms; and maintaining a system of internal controls over procurement activities.

Target Completion Date: December 30, 2016

OIG Analysis

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

Recommendation 3: CAO formally appoint a SPE and procurement officials who are authorized to approve warrants over \$100,000,000 and approve warrants for construction and architectural-engineering services contracting officers.

Management Response

NARA concurs with this recommendation. The Archivist of the United States formally appointed a SPE (and Acting CAO) in NARA Notice 2016-142, dated September 30, 2016. NARA 101 retains authority to issue warrants above \$100,000,000 in the CAO and does not delegate to any other procurement officials. Authority to issue warrants up to \$100,000,000 is delegated to the SPE only.

NARA is currently recruiting a new position in the Office of the CAO to assume Contracting Officer responsibilities for construction and architecture/engineering contracts. Once that position is filled, the CAO and Executive for Business Support will

transition all contracting work that requires a warrant to the Office of the CAO. The new CO will be warranted by the SPE according to existing procedures.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed by September 29, 2017.

OIG Analysis

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

Recommendation 4: Competition Advocate, in collaboration with the CAO, completes an evaluation and report on the overall strength of NARA's competition practice in accordance with the FAR and OMB guidance.

Management Response

NARA concurs with this recommendation. By January 31, 2017, the acting Competition Advocate and acting CAO will begin quarterly meetings to evaluate contracting actions completed in the previous quarter and consider opportunities to strengthen NARA competition practices. The Competition Advocate will prepare an annual report based on full-year FY 2017 contracting actions.

Target Completion Date: December 29, 2017

OIG Analysis

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

Recommendation 5: Competition Advocate, in collaboration with the CAO, develop and implement procedures to promote the acquisition of commercial items and report annually new initiatives to the CAO and SPE.

Management Response

NARA concurs with this recommendation. The acting Competition Advocate and acting CAO will develop procedures to promote the acquisition of commercial items by April 30, 2017. The Competition Advocate will include a discussion of new initiatives in the annual report described in Management's response to recommendation 4.

Target Completion Date: Procedures will be completed by April 28, 2017; annual reporting will begin by December 29, 2017.

OIG Analysis

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

Recommendation 6: The CAO develop and implement procedures to ensure contracting offices in BCN and BFS report all contract related activity to the SPE.

Management Response

NARA concurs with this recommendation. Once NARA hires a new CO in the Office of the CAO for construction and architecture/engineering contracts (as described in recommendation 3), acquisition professionals in Business Support Services will report all contract related activity to the CO in the Office of the CAO, who will report directly to the SPE.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed by September 29, 2017.

OIG Analysis

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

Recommendation 7: CAO ensure NARA 501 NARA Procurement policy and NARA's General Acquisition Policy addresses procurements related to Architecture/Engineering and Construction.

Management Response

NARA concurs with this recommendation. The acting CAO is preparing an update to NARA Directive 501 that will address this recommendation.

Target Completion Date: December 29, 2017

OIG Analysis

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

Recommendation 8: CAO, in collaboration with the CFO, Director of Acquisitions, and program managers, develop and implement procedures for proper planning of new contracts with NARA funds.

Management Response

NARA concurs with this recommendation. In FY 2017, the acting CAO will develop new procedures to improve controls over acquisitions processes and outcomes, including improving planning activities. However, NARA requires a permanent CAO in order to fully and successfully implement this recommendation.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

OIG Analysis

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

Recommendation 9: CAO develop and implement procedures to ensure contracts are evaluated to identify contracts that are wasteful, inefficient, or unlikely to meet NARA needs.

Management Response

NARA concurs with this recommendation. In FY 2017, the acting CAO will develop new procedures to improve controls over acquisitions processes and outcomes, including routine evaluations of contracts that are potentially wasteful, inefficient, or unlikely to meet NARA needs. However, NARA requires a permanent CAO in order to fully and successfully implement this recommendation.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

OIG Analysis

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

Recommendation 10: CAO and SPE develop and implement test plans and procedures to assess internal control over acquisition activities and programs using OMB Memorandum, *Conducting Acquisition Assessments*.

Management Response

NARA concurs with this recommendation. In FY 2017, the acting CAO will develop new procedures to improve controls over acquisitions processes and outcomes, including

acquisition assessments, monitoring procedures, and test plans. However, NARA requires a permanent CAO in order to fully and successfully implement this recommendation.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

OIG Analysis

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

Recommendation 11: CAO modify procedures to ensure all contracting activity, including Architecture/ Engineering, construction services are included in random selections for internal control reviews.

Management Response

NARA concurs with this recommendation. Once NARA hires a new CO in the Office of the CAO for construction and architecture/engineering contracts (see recommendation 3), the CAO will include architecture/engineering and construction services contracts in random selections for internal control reviews.

Target Completion Date: Completion is contingent on a pending hiring action, but should be incorporated into review processes by September 29, 2017.

OIG Analysis

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

Recommendation 12: CAO establish standards for retaining documentation supporting the evaluation of internal controls.

Management Response

NARA concurs with this recommendation. The acting CAO will establish written standards for retaining documentation supporting internal controls reviews.

Target Completion Date: January 31, 2017

OIG Analysis

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

Recommendation 13: CAO include CO's who are not GS1102's, COR's and P/PM's in the internal control program test plan.

Management Response

NARA concurs with this recommendation. In FY 2017, the acting CAO will develop new procedures to improve controls over acquisitions processes and outcomes; however, NARA requires a permanent CAO in order to fully and successfully implement this recommendation.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

OIG Analysis

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

Recommendation 14: We recommend the CAO establish various performance metrics to be tracked and analyzed on how long the acquisition takes, where delays occur and why delays occur. ¹

Management Response

NARA concurs with this recommendation. The acting CAO will refine existing measures for procurement acquisition lead times and identify and research deviations. However, more sophisticated reporting may require process or system changes.

Target Completion Date: The acting CAO will begin quarterly reporting by April 28, 2017 (for the quarter ending March 31, 2017).

OIG Analysis

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

Recommendation 15: CAO develop and implement meaningful and measurable performance metrics to continually assess the performance of the acquisition function in supporting NARA's mission and achieving acquisition goals.

¹ Recommendation #14 is duplicative of recommendation #13 in the final OIG Audit Report No, 17-AUD-06. Management appropriately responded to the correct recommendation #14 as transmitted in the draft report.

Management Response

NARA concurs with this recommendation. In FY 2017, the acting CAO will develop new measures to assess program performance; however, NARA requires a permanent CAO in order to establish acquisition goals and associated metrics.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

OIG Analysis

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

Recommendation 16: CAO ensure NARA 501 NARA Procurement policy include guidance to program offices on their responsibilities in the procurement process.

Management Response

NARA concurs with this recommendation. The acting CAO is preparing an update to NARA Directive 501 that will address this recommendation.

Target Completion Date: December 29, 2017

OIG Analysis

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

Recommendation 17: CAO ensure program offices are routinely trained in NARA procurement policy and procedures, specifically procurements requisition packages and procurement lead times.

Management Response

NARA concurs with this recommendation. The acting CAO provides regular training to program offices on NARA procurement policy and procedures, including requisition packages and procurement acquisition lead times. The acting CAO will provide the OIG with training materials and a list of training conducted in the past twelve months.

Target Completion Date: December 30, 2016

OIG Analysis

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

Recommendation 18: CAO assess staffing needs for NARA's Procurement Program to ensure the procurement program has sufficient staff to maintain effective, efficient operations and adhere to Federal and internal guidance.

Management Response

NARA concurs with this recommendation. NARA requires a permanent CAO in order to establish acquisition goals and associated metrics.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

OIG Analysis

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

Recommendation 19: CAO develop a process to monitor the close-out of contracts process to ensure contracts are closed in a timely manner and identify reasons contracts are not closed out in a timely manner.

Management Response

NARA concurs with this recommendation. The acting CAO is preparing an update to NARA Directive 501 that will address this recommendation.

Target Completion Date: December 29, 2017.

OIG Analysis

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

Recommendation 20: ACM verify all contracting officers, contracting officer representatives, program and project managers, and other contracting professionals set up an account in FAITAS for tracking certifications and continuous training.

Management Response

NARA concurs with this recommendation. The acting CAO, who is also the ACM, will ensure that all contracting officers, CORs, P/PM, and contract specialists set up an account in FAITAS for tracking training completion and certifications.

Target Completion Date: December 29, 2017.

OIG Analysis

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

Recommendation 21: ACM continue to work with the Federal Acquisition Institute to get access to all NARA staff accounts in FAITAS. If the ACM is unable to obtain direct access to NARA staff accounts, the ACM should develop and implement a tracking system to document and monitor training for all contracting officers, contracting officer representatives, program and project managers, and other contracting professionals ensuring compliance with the Federal Acquisition Certification.

Management Response

NARA concurs with this recommendation. NARA staff with FAITAS accounts can access reports on their own progress/completions, and routinely provide FAITAS reports to the ACM, who monitors their training. The ACM will continue to pursue direct access to NARA staff FAITAS accounts.

Target Completion Date: December 30, 2016

OIG Analysis

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

Recommendation 22: CAO work with the CIO to determine and document how best to support IT acquisition, such as through the development of specialized IT acquisition cadres, specifically contracting officers, and staff.

Management Response

NARA concurs with this recommendation. The acting CAO will work with the CIO to determine and document how best to support IT acquisition with existing resources.

Target Completion Date: March 31, 2017

OIG Analysis

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

Recommendation 23: ACM ensure NARA Certification for Program and Project Managers Applications are signed by the Deputy Archivist in accordance with NARA policy and maintained.

Management Response

NARA concurs with this recommendation. The acting CAO and Executive for Business Support will update existing policy to clarify roles and responsibilities, and establish procedures to ensure certifications receive all required approvals and signatures.

Target Completion Date: September 29, 2017

OIG Analysis

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

Recommendation 24: CAO ensure all contracting officers, regardless of their government series, be certified at an appropriate level; and any contracting professional issued an unlimited warrant be level III certified.

Management Response

NARA concurs with this recommendation. All Contracting Officers are currently certified at the appropriate level, except for three who have not obtained all of the required Continuing Professional Education (CPE) credits. Each of those employees has been given a specific deadline to complete required training (deadlines vary, based on the number of CPE credits outstanding); after that date, their warrants will be reduced to the level supported by their actual CPE credits.

Target Completion Date: Phased, based on individual status but no later than November 21, 2017.

OIG Analysis

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

Recommendation 25: CAO establish and implement procedures for potential administrative or disciplinary actions for contracting officers, and contracting officer representatives, and other contracting professionals that do not have their FAC certifications or continuous trainings required by OMB guidance. For example, if after one year from notice the contracting professional still does not have appropriate certificates and/or training, disciplinary action, removal of warrant or removal from the position may occur.

Management Response

NARA concurs with this recommendation. The acting CAO is preparing an update to NARA Directive 501 that will address this recommendation.

Target Completion Date: December 29, 2017

OIG Analysis

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

Recommendation 26: CAO ensure there is more IT training for CO's that do a significant amount of work in IT in accordance with OMB technology acquisition cadre guidance.

Management Response

NARA concurs with this recommendation. Any actions to implement this recommendation will depend on the outcome of actions to address recommendation 22, "We recommend that the CAO work with the CIO to determine and document how best to support IT acquisition".

Target Completion Date: This action should be completed within 12 months of the target completion date for recommendation 22, or by March 30, 2018.

OIG Analysis

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



Date: DEC 06 2016
To: James Springs, Inspector General
From: David S. Ferriero, Archivist of the United States
Subject: Management's Response to OIG Report 17-AUD-06, *Audit of NARA's Procurement Program*

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

Your report provides a comprehensive evaluation of NARA's procurement program and useful recommendations that, once implemented, will improve program effectiveness and enhance management controls over procurement processes and outcomes. Your recommendations, while insightful, are also complex and many require changes to agency culture and long-standing practices. Effective implementation will require the leadership and commitment of NARA's Chief Acquisition Officer (CAO), a position that is currently vacant. Some of the targeted completion dates for management actions have been extended to accommodate selection and placement of a new CAO.

We concur with the 26 recommendations in this audit, and in response, the attachment provides a summary of our proposed actions. For those actions that require a permanent CAO, we have set target completion dates assuming that position is filled by March 31, 2017. Management may adjust those dates, depending on when that position is actually filled. As each recommendation is satisfied, we will provide documentation to your office.

NATIONAL ARCHIVES *and*
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If you have questions about this action plan, please contact Kimm Richards at kimm.richards@nara.gov or by phone at 301-837-1668.

A handwritten signature in black ink, appearing to read "D S Ferriero".

DAVID S. FERRIERO
Archivist of the United States

Attachment

**Action Plan Response to OIG Report:
17-AUD-06, Audit of NARA's Procurement Program**

Recommendation 1: We recommend the CAO and SPE are structured to ensure alignment with NARA leadership and used by leadership as a business partner in supporting mission needs.

Planned Action: On October 3, 2016, NARA reorganized to establish the Office of the Chief Acquisition Officer as a separate unit, to be headed by a new Senior Executive Chief Acquisition Officer. The new CAO position holds a place in the organizational structure that is equivalent to the CFO, CHCO, CIO, and Executive for Business Support. The CAO is supported by a Senior Procurement Executive, who reports directly to the CAO.

The functions and authorities of the CAO and SPE, enumerated in NARA Directive 101, include all authorities assigned to CAOs and SPEs in the Services Acquisition Reform Act (SARA, 41 U.S.C. § 1702). The functions of the CAO begin with the most significant role of the new position: "Provides advice and assistance to the Archivist of the United States in establishing appropriate business strategies to achieve the NARA mission and agency performance objectives..."

Target Completion Date: December 30, 2016

Recommendation 2: We recommend the Archivist ensures the CAO responsibilities and title are assigned or delegated to an official who performs the duties of a CAO, including establishing an effective control environment, identifying acquisition objectives, and assessing the risks facing NARA as it seeks to achieve acquisition objectives.

Planned Action: As of October 3, 2016, NARA Directive 101, *NARA Organization and Delegation of Authority*, assigns functions and specifically delegates the CAO authority established in SARA to a new and separate position that exclusively holds acquisition responsibilities. NARA 101 specifically delegates authority to advise and assist the Archivist of the United States in determining appropriate business strategies, and authority to monitor and evaluate the performance of acquisition activities and programs. The CAO functions enumerated in the NARA 101 include: developing acquisition strategies; implementing procurement initiatives, best practices, and reforms; and maintaining a system of internal controls over procurement activities.

Target Completion Date: December 30, 2016

Recommendation 3: We recommend the CAO formally appoint a SPE and procurement officials who are authorized to approve warrants over \$100,000,000 and approve warrants for construction and architectural-engineering services contracting officers.

Planned Action: The Archivist of the United States formally appointed a SPE (and acting CAO) in NARA Notice 2016-142, dated September 30, 2016. NARA 101 retains authority to issue warrants above \$100,000,000 in the CAO and does not delegate to any other procurement officials. Authority to issue warrants up to \$100,000,000 is delegated to the SPE only.

NARA is currently recruiting a new position in the Office of the CAO to assume Contracting Officer responsibilities for construction and architecture/engineering contracts. Once that position is filled, the CAO and Executive for Business Support will transition all contracting work that requires a warrant to the Office of the CAO. The new CO will be warranted by the SPE according to existing procedures.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed by September 29, 2017.

Recommendation 4: We recommend the Competition Advocate, in collaboration with the CAO, completes an evaluation and report on the overall strength of NARA's competition practice in accordance with the FAR and OMB guidance.

Planned Action: By January 31, 2017, the acting Competition Advocate and acting CAO will begin quarterly meetings to evaluate contracting actions completed in the previous quarter and consider opportunities to strengthen NARA competition practices. The Competition Advocate will prepare an annual report based on full-year FY 2017 contracting actions.

Target Completion Date: December 29, 2017

Recommendation 5: We recommend the Competition Advocate, in collaboration with the CAO, develop and implement procedures to promote the acquisition of commercial items and report annually new initiatives to the CAO and SPE.

Planned Action: The acting Competition Advocate and acting CAO will develop procedures to promote the acquisition of commercial items by April 30, 2017. The Competition Advocate will include a discussion of new initiatives in the annual report described in Management's response to recommendation 4.

Target Completion Date: Procedures will be completed by April 28, 2017; annual reporting will begin by December 29, 2017.

Recommendation 6: We recommend the CAO develop and implement procedures to ensure contracting offices in BCN and BFS report all contract related activity to the SPE.

Planned Action: Once NARA hires a new CO in the Office of the CAO for construction and architecture/engineering contracts (as described in recommendation 3), acquisition professionals in Business Support Services will report all contract related activity to the CO in the Office of the CAO, who will report directly to the SPE.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed by September 29, 2017.

Recommendation 7: We recommend the CAO ensure NARA 501 NARA Procurement policy and NARA's General Acquisition Policy addresses procurements related to Architecture/Engineering and Construction.

Planned Action: The acting CAO is preparing an update to NARA Directive 501 that will address this recommendation.

Target Completion Date: December 29, 2017

Recommendation 8: We recommend the CAO, in collaboration with the CFO, Director of Acquisitions, and program managers, develop and implement procedures for proper planning of new contracts with NARA funds.

Planned Action: In FY 2017, the acting CAO will develop new procedures to improve controls over acquisitions processes and outcomes, including improving planning activities. However, NARA requires a permanent CAO in order to fully and successfully implement this recommendation.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

Recommendation 9: We recommend the CAO develop and implement procedures to ensure contracts are evaluated to identify contracts that are wasteful, inefficient, or unlikely to meet NARA needs.

Planned Action: In FY 2017, the acting CAO will develop new procedures to improve controls over acquisitions processes and outcomes, including routine evaluations of contracts that are potentially wasteful, inefficient, or unlikely to meet NARA needs. However, NARA requires a permanent CAO in order to fully and successfully implement this recommendation.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

Recommendation 10: We recommend the CAO and SPE develop and implement test plans and procedures to assess internal control over acquisition activities and programs using OMB Memorandum, *Conducting Acquisition Assessments*.

Planned Action: In FY 2017, the acting CAO will develop new procedures to improve controls over acquisitions processes and outcomes, including acquisition assessments, monitoring procedures, and test plans. However, NARA requires a permanent CAO in order to fully and successfully implement this recommendation.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

Recommendation 11: We recommend the CAO modify procedures to ensure all contracting activity, including Architecture/ Engineering, construction services are included in random selections for internal control reviews.

Planned Action: Once NARA hires a new CO in the Office of the CAO for construction and architecture/engineering contracts (see recommendation 3), the CAO will include architecture/engineering and construction services contracts in random selections for internal control reviews.

Target Completion Date: Completion is contingent on a pending hiring action, but should be incorporated into review processes by September 29, 2017.

Recommendation 12: We recommend the CAO establish standards for retaining documentation supporting the evaluation of internal controls.

Planned Action: The acting CAO will establish written standards for retaining documentation supporting internal controls reviews.

Target Completion Date: January 31, 2017

Recommendation 13: We recommend the CAO include CO's who are not GS1102's, COR's and P/PM's in the internal control program test plan.

Planned Action: In FY 2017, the acting CAO will develop new procedures to improve controls over acquisitions processes and outcomes; however, NARA requires a permanent CAO in order to fully and successfully implement this recommendation.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

Recommendation 14: We recommend the CAO establish various performance metrics to be tracked and analyzed on how long the acquisition takes, where delays occur and why delays occur.

Planned Action: The acting CAO will refine existing measures for procurement acquisition lead times and identify and research deviations. However, more sophisticated reporting may require process or system changes.

Target Completion Date: The acting CAO will begin quarterly reporting by April 28, 2017 (for the quarter ending March 31, 2017).

Recommendation 15: We recommend the CAO develop and implement meaningful and measurable performance metrics to continually assess the performance of the acquisition function in supporting NARA's mission and achieving acquisition goals.

Planned Action: In FY 2017, the acting CAO will develop new measures to assess program performance; however, NARA requires a permanent CAO in order to establish acquisition goals and associated metrics.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

Recommendation 16: We recommend the CAO ensure NARA 501 NARA Procurement policy include guidance to program offices on their responsibilities in the procurement process.

Planned Action: The acting CAO is preparing an update to NARA Directive 501 that will address this recommendation.

Target Completion Date: December 29, 2017

Recommendation 17: We recommend the CAO ensure program offices are routinely trained in NARA procurement policy and procedures, specifically procurements requisition packages and procurement lead times.

Planned Action: The acting CAO provides regular training to program offices on NARA procurement policy and procedures, including requisition packages and procurement acquisition lead times. The acting CAO will provide the OIG with training materials and a list of training conducted in the past twelve months.

Target Completion Date: December 30, 2016

Recommendation 18: We recommend the CAO assess staffing needs for NARA's Procurement Program to ensure the procurement program has sufficient staff to maintain effective, efficient operations and adhere to Federal and internal guidance.

Planned Action: NARA requires a permanent CAO in order to establish acquisition goals and associated metrics.

Target Completion Date: Completion is contingent on a pending hiring action, but should be completed within 12 months of the selection of a new CAO, or by March 30, 2018, whichever is earlier.

Recommendation 19: We recommend the CAO develop a process to monitor the close-out of contracts process to ensure contracts are closed in a timely manner and identify reasons contracts are not closed out in a timely manner.

Planned Action: The acting CAO is preparing an update to NARA Directive 501 that will address this recommendation.

Target Completion Date: December 29, 2017

Recommendation 20: We recommend the ACM verify all contracting officers, contracting officer representatives, program and project managers, and other contracting professionals set up an account in FAITAS for tracking certifications and continuous training.

Planned Action: The acting CAO, who is also the ACM, will ensure that all contracting officers, CORs, P/PM, and contract specialists set up an account in FAITAS for tracking training completion and certifications.

Target Completion Date: December 29, 2017

Recommendation 21: We recommend the ACM continue to work with the Federal Acquisition Institute to get access to all NARA staff accounts in FAITAS. If the ACM is unable to obtain direct access to NARA staff accounts, the ACM should develop and implement a tracking system to document and monitor training for all contracting officers, contracting officer representatives, program and project managers, and other contracting professionals ensuring compliance with the Federal Acquisition Certification.

Planned Action: NARA staff with FAITAS accounts can access reports on their own progress/completions, and routinely provide FAITAS reports to the ACM, who monitors their training. The ACM will continue to pursue direct access to NARA staff FAITAS accounts.

Target Completion Date: December 30, 2016

Recommendation 22: We recommend the CAO work with the CIO to determine and document how best to support IT acquisition, such as through the development of specialized IT acquisition cadres, specifically contracting officers, and staff.

Planned Action: The acting CAO will work with the CIO to determine and document how best to support IT acquisition with existing resources.

Target Completion Date: March 31, 2017

Recommendation 23: We recommend the ACM ensure NARA Certification for Program and Project Managers Applications are signed by the Deputy Archivist in accordance with NARA policy and maintained.

Planned Action: The acting CAO and Executive for Business Support will update existing policy to clarify roles and responsibilities, and establish procedures to ensure certifications receive all required approvals and signatures.

Target Completion Date: September 29, 2017

Recommendation 24: We recommend the CAO ensure all contracting officers, regardless of their government series, be certified at an appropriate level; and any contracting professional issued an unlimited warrant be level III certified.

Planned Action: All Contracting Officers are currently certified at the appropriate level, except for three who have not obtained all of the required Continuing Professional Education (CPE) credits. Each of those employees has been given a specific deadline to complete required training (deadlines vary, based on the number of CPE credits outstanding); after that date, their warrants will be reduced to the level supported by their actual CPE credits.

Target Completion Date: Phased, based on individual status but no later than November 21, 2017.

Recommendation 25: We recommend the CAO establish and implement procedures for potential administrative or disciplinary actions for contracting officers, and contracting officer representatives, and other contracting professionals that do not have their FAC certifications or continuous trainings required by OMB guidance. For example, if after one year from notice the contracting professional still does not have appropriate certificates and/or training, disciplinary action, removal of warrant or removal from the position may occur.

Planned Action: The acting CAO is preparing an update to NARA Directive 501 that will address this recommendation.

Target Completion Date: December 29, 2017

Recommendation 26: We recommend the CAO ensure there is more IT training for CO's that do a significant amount of work in IT in accordance with OMB technology acquisition cadre guidance.

Planned Action: Any actions to implement this recommendation will depend on the outcome of actions to address recommendation 22, "We recommend that the CAO work with the CIO to determine and document how best to support IT acquisition".

Target Completion Date: This action should be completed within 12 months of the target completion date for recommendation 22, or by March 30, 2018.