



Inspector General

September 30, 2024

TO: Dr. Colleen Shogan
Archivist of the United States

FROM: Dr. Brett M. Baker
Inspector General

SUBJECT: *Evaluation of NARA's Controls Over Records Relocation*
OIG Report No. 24-R-10

The Office of Inspector General (OIG) contracted with Sikich CPA LLC (Sikich) to conduct an independent performance evaluation of NARA's Evaluation of NARA's Controls Over Records Relocation. Attached is Sikich's report titled Evaluation of NARA's Evaluation of NARA's Controls Over Records Relocation. The objective of this evaluation was to assess the controls that NARA has in place to safeguard and account for records when relocating them between NARA facilities. The report contains six recommendations to strengthen NARA's processes for records relocation. Agency staff indicated they had no comments for inclusion in this report.

Sikich is responsible for the attached report dated September 30, 2024 and the conclusions expressed in the report. The findings and conclusions presented in the report are the responsibility of Sikich. The OIG's responsibility is to provide adequate oversight of the contractor's work in accordance with Generally Accepted Government Audit Standards.

Please provide planned corrective actions and expected dates to complete the actions for each of the recommendations within 30 days of the date of this report. As with all OIG products, we determine what information is publicly posted on our website from the published report. Consistent with our responsibility under the Inspector General Act of 1978, as amended, we may provide copies of our report to congressional committees oversight responsibility over NARA. We appreciate the cooperation and assistance NARA extended to us during this evaluation. Please contact me with any questions.

Cc:

William. J. Bosanko, Deputy Archivist of the United States
Merrily Harris, Executive Secretariat
Jay Trainer, Acting Chief Operating Officer
Colleen Murphy, Acting Chief of Management and Administration
Meghan Guthorn, Deputy Chief Operating Officer

Tasha Ford, Director, Federal Records Center Program
Kevin Pratt, Chief of Staff, Agency Services
Chris Naylor, Executive for Research Services
Sarah Farinholt, Chief of Staff, Research Services
Damon Nevils, Acting Chief Acquisition Officer
Kimm Richards, Accountability
William Brown, Senior Program Auditor
Kurt Thompson, Senior Program Auditor
United States Senate Homeland Security and Governmental Affairs Committee
United States House of Representatives Committee on Oversight and Reform



EVALUATION OF NARA'S CONTROLS OVER RECORDS RELOCATION

**SUBMITTED TO
NATIONAL ARCHIVES AND RECORDS ADMINISTRATION**

EVALUATION REPORT

SEPTEMBER 30, 2024

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333 John Carlyle Street, Suite 500
Alexandria, VA 22314
703.836.6701

SIKICH.COM

September 30, 2024

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

Subject: Evaluation of NARA's Controls Over Records Relocation

Dear Dr. Baker,

Sikich CPA LLC (Sikich)¹ is pleased to submit the attached report detailing the results of our evaluation of the National Archives and Records Administration's (NARA's) controls over records relocation, conducted under contract number 8831032A00012. The objective of this evaluation was to assess the controls that NARA has in place to safeguard and account for records when relocating them between NARA facilities. To address this objective, we performed site visits at select NARA facilities and tested key controls related to the record relocation.

We conducted the evaluation fieldwork in Alexandria, Virginia, from October 2023 through July 2024. We conducted this evaluation in accordance with the Council of Inspectors General on Integrity and Efficiency's (CIGIE's) *Quality Standards for Inspections and Evaluations*, issued December 2020. Those standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our evaluation objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objectives.

We thank the NARA staff within the Federal Record Center Program and Research Services for the cooperation and assistance provided to us during the course of this evaluation.

Sincerely,

Sikich CPA LLC

September 30, 2024

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

I. EXECUTIVE SUMMARY

Why Did We Conduct This Evaluation?

The objective of the evaluation was to assess the controls that the National Archives and Record Administration (NARA) had in place to account for and safeguard records during the records relocation process between NARA facilities and recommend actions to improve the relocation process.

What Did We Recommend?

We made five recommendations to improve oversight and quality controls around the record relocation process to enable NARA to better safeguard Government records to meet NARA's mission.

What Did We Find?

We found that NARA's Research Services and the Federal Records Center Program (FRCP) did not fully comply with the Performance Work Statement (PWS) requirements for the relocation of records. Not fully complying with PWS requirements resulted in insufficient validation and confirmation of the actual quantities of records moved, and limited assurance that records were shelved in the correct spaces, in the proper order, and without loss or damage.

Specifically, FRCP personnel were unable to furnish Pull Lists (i.e., lists of records the vendor relocated in each truckload) for some samples. In other cases, the Pull Lists did not have proper signoffs certifying that the records had been properly de-shelved. Additionally, the Put Away Reports (i.e., lists of records that the vendor unloaded and shelved) were missing NARA personnel signoff, which was required by the PWS.

Similarly, Research Services personnel were unable to furnish the copies of the Master Spreadsheet identifying the records the vendor relocated for some of the relocated records sampled. Additionally, the provided copies of the Master Spreadsheet were not properly certified by NARA personnel. This indicates non-compliance with required procedures and inadequate documentation of the records relocation process.

II. SUMMARY OF RECOMMENDATIONS

Finding 1: Performance Work Statement Requirements for Relocation of Federal Records Center Records Were Not Fully Followed

Number	Recommendation	Responsible Office
1	Implement a documented process requiring the assignment of a Quality Assurance Evaluator for future relocation of records project(s).	Federal Records Center Program
2	Ensure a Quality Assurance Surveillance Plan is developed and implemented requiring onsite supervision to provide proper oversight and compliance with the PWS.	Federal Records Center Program

Finding 2: Performance Work Statement Requirements for Relocation of Archival Records Were Not Fully Followed

Number	Recommendation	Responsible Office
3	In collaboration with the applicable parties, ensure PWS requirements are developed to reflect the procedures necessary to protect and account for the relocation of archival records that should include: <ul style="list-style-type: none"> a. Implementing a documented process requiring the assignment of a Quality Assurance Evaluator for future relocation of records project(s). b. Ensuring a Quality Assurance Surveillance Plan is developed, approved, and implemented requiring onsite supervision to provide proper oversight and compliance with the PWS. 	Research Services
4	Develop and implement standard operating procedures to ensure that Research Services personnel comply with the PWS requirements.	Research Services
5	Develop and implement standard operating procedures to communicate final PWS requirements to all responsible parties before the contract is awarded.	Office of the Chief Acquisition Officer

III. BACKGROUND

The National Archives and Records Administration (NARA) is an independent agency within the executive branch of the Federal Government responsible for preserving, protecting, and providing access to the records of the Government. NARA operates a main facility in College Park, Maryland, other locations in the Washington, DC area, and various regional archives, Federal Record Centers (FRC), and Presidential Libraries across the country. NARA plays a crucial role in maintaining American democracy by safeguarding government records, ensuring public access to these documents, and supporting civic education and historical understanding of the national experience.

In fulfilling its mission, NARA maintains two types of records: FRCP records and archival records. The FRCP manages the FRCs, which are designed to store records that federal agencies need to retain for a specific period, as required by federal records management regulations. These records remain in the legal custody of the originating federal agencies until

they are either destroyed or transferred to NARA. Research Services manages permanent archival records, which are preserved for long-term historical, legal, or research value.

NARA has undertaken a large-scale move to vacate and relocate records from Building 9 in Fort Worth, Texas. This relocation effort required moving FRC records to the Lenexa FRC in Lenexa, Kansas, and archival records were moved to the National Archives at Kansas City in Kansas City, Missouri, and the National Archives at Fort Worth (Burgess Building) in Fort Worth, Texas.

IV. EVALUATION RESULTS

Finding 1. Performance Work Statement Requirements for Relocation of FRC Records Were Not Fully Followed

NARA personnel did not ensure compliance with the PWS, resulting in insufficient validation and confirmation of actual quantities of records moved, as well as ensuring that records were shelved in the correct spaces, in proper order, and without loss or damage. Our review of the Pull List and Put Away Report identified the following exceptions:

- a. For 2 of the 40 samples tested, NARA was unable to furnish the Pull List.
- b. Of the 38 Pull Lists tested, 2 were missing proper signoff by NARA personnel certifying the records have been properly de-shelved from Building 9.
- c. For all 40 samples tested, the Put Away Report was missing signoff by NARA personnel certifying the records had been properly shelved in the correct space, in the proper order, and without significant loss or damage.

The PWS for the Relocation of Federal Government Records requires that both NARA and the Vendor validate and confirm the actual quantities of records moved each day, with both parties signing off on the relevant documents. Specifically, the PWS requires both NARA personnel and the Vendor sign and date the completed Pull List once the records are loaded onto the truck and again after records are shelved, to confirm correct placement and condition. Additionally, the PWS requires NARA personnel to verify the accuracy of the records moved and shelved, reporting any discrepancies immediately. Furthermore, the Quality Assurance Surveillance Plan (QASP) mandates that NARA perform systematic surveillance and record defects caused by any non-conformance with contract requirements.

NARA did not meet these PWS requirements as it did not assign a Quality Assurance Evaluator to oversee the record relocation project. A Quality Assurance Evaluator would have provided the necessary oversight of both the PWS requirements and the activities of NARA and Vendor personnel. Additionally, the absence of onsite supervision further contributed to NARA's non-compliance with the stated PWS requirements.

Insufficient certification of the accuracy of relocated federal records, including quantities, by both NARA and vendor personnel, can lead to missing, misplaced, and damaged FRC records.

Recommendations

We recommend the Director of the Federal Records Center Program:

1. **Recommendation 1:** Implement a documented process requiring the assignment of a Quality Assurance Evaluator for future relocation of records project(s).

2. **Recommendation 2:** Ensure a Quality Assurance Surveillance Plan is developed and implemented requiring onsite supervision to provide proper oversight and compliance with the PWS.

Finding 2. Performance Work Statement Requirements for Relocation of Archival Records Were Not Fully Followed

NARA personnel did not ensure compliance with the PWS, resulting in insufficient validation and confirmation of the actual quantities of records moved, as well as ensuring that records were shelved in the correct spaces, in proper order, and without loss or damage. Research Services utilized a copy of the Master Spreadsheet instead of the Pull List to coordinate the move of the records. However, the copy of Master Spreadsheet did not provide the level of evidence required by the PWS.

- a. For 9 of the 40 samples tested, Research Services was unable to furnish the printed copy of the Master Spreadsheet identifying the records have been relocated with each truckload (Pull). For the remaining 31 samples, the copy of the Master Spreadsheet was not properly certified by NARA personnel.
- b. For 1 of the 40 samples tested, Research Services was unable to furnish the printed copy of the Master Spreadsheet identifying the records were unloaded and shelved (Put Away). For the remaining 39 samples, the copy of the Master Spreadsheet was not properly certified by NARA personnel.

The PWS for the Relocation of Federal Government Records requires both NARA and the vendor to validate and confirm the actual quantities of records moved daily, with both parties signing off on the relevant documents. Furthermore, the PWS requires NARA personnel to verify the accuracy of the records moved and shelved and to immediately report any discrepancies. The QASP also mandates systematic surveillance and recording of defects for any non-conformance with contract requirements.

NARA did not comply with these PWS requirements as it did not assign a Quality Assurance Evaluator to oversee the record relocation project. A Quality Assurance Evaluator would have provided the necessary oversight of both the PWS requirements and the activities of NARA and vendor personnel. Additionally, we noted insufficient communication between Research Services and Business Support Services regarding the PWS requirements and NARA's implementation, monitoring, and enforcement of the PWS. The absence of onsite supervision also contributed to NARA's non-compliance with the stated PWS requirements.

Insufficient certification of the accuracy of relocated records, including quantities, by both NARA and vendor personnel, increases the risk of records being lost, misplaced, or damaged.

Recommendations

We recommend the Executive for Research Services:

3. **Recommendation 3:** In collaboration with applicable parties, ensure PWS requirements are developed to reflect the procedures necessary to protect and account for the relocation of archival records that should include:
 - a. Implementing a documented process requiring the assignment of a Quality Assurance Evaluator for future relocation of records project(s).

- b. Ensuring a Quality Assurance Surveillance Plan is developed, approved, and implemented requiring onsite supervision to provide proper oversight and compliance with the PWS.
4. **Recommendation 4:** Develop and implement standard operating procedures to ensure that Research Services personnel comply with the PWS requirements.

We recommend the Chief Acquisition Officer:

5. **Recommendation 5:** Develop and implement standard operating procedures to communicate final PWS requirements to all responsible parties before the contract is awarded.

V. OTHER MATTERS

In addition to the findings reported above, our site visit testing identified several observations, as outlined below.

1. Record was not shelved in the designated location as specified in ARCIS²/HMS³.
As part of the site visit testing, we performed a sheet-to-floor⁴ and a floor-to-sheet⁵ testing to verify whether the assets were properly shelved in the correct locations as specified in ARCIS for FRC records and in HMS for archival records. As part of validating the physical locations of the FRC and archival records, we noted the following:
 - a. For one FRC sample, we noted that the box was not shelved in the designated location as specified in ARCIS.
 - b. For two Archival samples, we noted that the assets were not shelved in the designated location as specified in HMS.
2. The wrong Asset Identification label was tagged on the box.
For one Archival sample, we observed that the box was labeled with an incorrect Asset Identification. This can lead to difficulties in locating and retrieving the correct asset, potential misplacement or loss of asset, and inaccuracies in inventory records.
3. ARCIS did not accurately reflect the status of the boxes.
In addition to verifying the physical locations of the assets against the locations recorded in ARCIS/HMS during our floor-to-sheet testing, we also verified whether the systems reflected the correct status for each asset. For two FRC samples selected from the floor, we observed the following:

² ARCIS (Archives and Records Centers Information System) is a system used to manage and track federal records that are stored at NARA's record centers. ARCIS is crucial for ensuring that federal records are maintained according to legal and regulatory requirements, and it facilitates the secure and efficient management of those records by both NARA and other federal agencies.

³ HMS (Holdings Management System) is used to manage and track the holdings within NARA's archival facilities. This system is integral to the administration and preservation of historical records and documents that are part of the U.S. National Archives.

⁴ The sheet-to-floor testing as conducted on all the samples selected from the ARCIS and HMS systems to verify the physical locations at the facilities.

⁵ The floor-to-sheet testing was carried out under the evaluator's discretion. The samples were haphazardly selected on-site and may not have been specifically related to the Building 9 relocation project. The samples selected from the floor were traced back to the ARCIS or HMS system to verify shelving in the correct location.

- a. According to ARCIS, a file within the Box was requested for retrieval by a federal agency, and it indicated that the FRC currently holds possession of the Box with the remaining files. However, upon inspection, we observed that the entire box had been removed from the shelf.
- b. The Box that was permanently removed in November 2006 was not subsequently updated in ARCIS to reflect its permanent removal. Thus, ARCIS did not indicate that the Box is no longer in possession of FRC.

APPENDIX A – OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

Our objective was to assess NARA's controls in place to safeguard and account for records during the relocation of records between NARA facilities.

Scope

The evaluation, performed from March 2023 to May 2024, covered the relocation of records vacated from Building 9 in Fort Worth, Texas. The evaluation was specific to testing compliance and internal controls related to NARA's relocation process. The FRC records were moved to the Lenexa FRC in Lenexa, Kansas and archival records were moved to the National Archives at Kansas City in Kansas City, Missouri, and the National Archives at Fort Worth (Burgess Building) in Fort Worth, Texas.

Methodology

During the planning phase, we developed our overall strategy for the expected scope and timing of evaluation procedures. The planning phase objectives were to develop an understanding of the entity and the objectives of the evaluation as well as develop testing steps to address the evaluation objectives.

In the fieldwork phase, we obtained sufficient evidence related to the objectives and researchable questions identified in the planning phase. Our fieldwork phase consisted of obtaining an understanding of internal controls related to NARA's record relocation process and testing of those controls.

To address our evaluation objectives, we:

- Reviewed relevant laws, regulations, policies, and procedures.
- Conducted interviews with NARA personnel to further our understanding of NARA's record relocation process.
- Identified key controls relevant to the evaluation objectives.
- Analyzed the asset inventory involved in the relocation from Building 9.
- Established and documented the sampling methodology to be performed.
- Conducted site visits to Fort Worth, Texas, Lenexa, Kansas, and Kansas City, Missouri to observe the record relocation process and to test significant key controls related to record relocation. As part of testing the controls surrounding NARA's relocation process, we selected a total of 80 samples distributed evenly between federal records and archival records; 40 samples allocated to each record type. Within the subset of archival records, 20 samples were selected for each relocation phase.
- Documented and communicated any exceptions and control weaknesses identified during the site visits and key control testing.

We conducted this evaluation from October 2023 through July 2024, in accordance with the Council of Inspectors General on Integrity and Efficiency's (CIGIE's) *Quality Standards for Inspections and Evaluations*, December 2020. Those standards require that we plan and perform the evaluation to support our findings and provide a reasonable basis for our conclusions based on the evaluation objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objective.

APPENDIX B – MANAGEMENT RESPONSE

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

APPENDIX C – ACRONYMS

Acronym	Definition
ARCIS	Archives and Records Centers Information System
CIGIE	Council of Inspectors General on Integrity and Efficiency
FRC	Federal Records Center
FRCP	Federal Records Center Program
HMS	Holdings Management System
NARA	National Archives and Records Administration
OIG	Office of the Inspector General
PWS	Performance Work Statement
QASP	Quality Assurance Surveillance Plan

APPENDIX D – REPORT DISTRIBUTION LIST

Archivist of the United States
Deputy Archivist of the United States
Executive Secretariat
Executive for Agency Services
Director of Federal Records Center Program
Chief of Staff, Agency Services
Executive for Research Services
Chief of Staff, Research Services
Acting Chief Acquisition Officer
Accountability
United States Homeland Security and Governmental Affairs Committee
United States House of Representatives Committee on Oversight and Accountability

APPENDIX E – OIG HOTLINE CONTACT INFORMATION

The OIG Hotline provides a confidential channel for reporting fraud, waste, abuse, and mismanagement to the OIG. In addition to receiving telephone calls at a toll-free Hotline number, we also accept emails through an online referral form. Walk-ins are always welcome. Visit <https://naraoig.oversight.gov/> for more information, or contact us:

Contact the OIG Hotline

[Online Complaint Form](#)

Contact the OIG by telephone and FAX

Hotline Telephone: 301-837-3500 (local) or 1-800-786-2551 (toll-free)

FAX: 301-837-3197

Contractor Self-Reporting Hotline

As required by the Federal Acquisition Regulation, a web-based form allows NARA contractors to notify the OIG, in writing, whenever the contractor has credible evidence a principal, employee, agent, or subcontractor of the contractor has committed a violation of the civil False Claim Act or a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations in connection with the award, performance, or closeout of a contract or any related subcontract. The form can be accessed through the OIG's home page or found directly at our [Contractor Reporting Form](#).