

NSF's Relocation to its New Headquarters Location — Records Management

NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL

September 28, 2017
OIG 17-3-003





AT A GLANCE

NSF's Relocation to its New Headquarters Location – Records Management

Report No. OIG 17-3-003
September 28, 2017

WHY WE DID THIS INSPECTION

We conducted this inspection to determine if NSF implemented 1) procedures to decrease the amount of paper records moved to its new location, 2) controls in its records management and digitization efforts, and 3) internal controls to ensure the safekeeping of records by departing employees. We also determined if NSF adequately addressed the concerns raised in the U.S. Government Accountability Office's May 2015 report on managing government records.

WHAT WE FOUND

NSF implemented some records management actions to reduce the amount of paper records moved to the new Alexandria headquarters. NSF hired a new records management official in November 2015, and it has appropriate controls to ensure the safeguarding of records provided to the two contractors for records management and digitization services. In addition, NSF took corrective action to address recommendations in the U.S. Government Accountability Office 2015 report.

Although NSF has made progress to decrease paper records, more work is needed. NSF risks not completing its scanning/digitization project efficiently. In addition, because only approximately 36 percent of NSF employees completed records management training, there is a risk that staff may have inadvertently discarded official records before the relocation. At the time of our fieldwork, NSF's separation clearance form and the *Employee Onboarding and Separation Guide* did not address records management. In June 2017, NSF updated the form and the guide to include records management, reducing the risk of departing employees disposing of official records.

WHAT WE RECOMMEND

We made five recommendations to improve records management.

AGENCY RESPONSE

NSF generally agreed with our recommendations. Regarding recommendation 2, NSF responded that it completed quality control testing in April 2016. However, based on our review of information provided, NSF's testing was not sufficient and NSF should continue quality control testing.

FOR FURTHER INFORMATION, CONTACT US AT (703) 292-7100 OR OIG@NSF.GOV.



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL

MEMORANDUM

DATE: September 28, 2017

TO: Joanne S. Tornow
Head
Office of Information and Resource Management

FROM: Mark Bell *Mark Bell*
Assistant Inspector General
Office of Audits

SUBJECT: Final Report No. 17-3-003, *NSF's Relocation to its New Headquarters Location - Records Management*

Attached is the final report on the subject inspection. We have included NSF's response to the draft report as an appendix.

This report contains five recommendations aimed at improving NSF's records management. In accordance with OMB Circular A-50, *Audit Followup*, please provide our office with a written corrective action plan to address the report's recommendations. In addressing the report's recommendations, the corrective action plan should detail specific actions and associated milestone dates. Please provide the action plan within 60 calendar days of the date of this report.

We appreciate the courtesies and assistance NSF staff provided during the inspection. If you have questions, please contact Elizabeth Goebels, Director of Performance Audits, at (703) 292-7100.

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ABBREVIATIONS

BFA	Office of Budget, Finance and Award Management
DAS	Division of Administrative Services
DIS	Division of Information Systems
ERMS	electronic records management system
GAO	U.S. Government Accountability Office
NARA	U.S. National Archives and Records Administration
OIRM	Office of Information and Resource Management
OMB	Office of Management and Budget



Background

The National Science Foundation is an independent Federal agency created by Congress in 1950 to promote the progress of science; to advance the national health, prosperity, and welfare; and to secure the national defense. NSF supports basic research and people to create knowledge that transforms the future, and is currently headquartered in two buildings in Arlington, Virginia.

NSF's Relocation to its New Headquarters in Alexandria, Virginia

In June 2013, the U.S. General Services Administration announced that it selected and signed a 15-year lease agreement on behalf of NSF for a new headquarters building to be constructed in Alexandria, Virginia. The lease for the new building began on September 1, 2017, and NSF must complete the move to the new building by December 2017 before its current leases expire. During this time, NSF needs to relocate about 2,260 people; move furniture and information technology equipment; and decommission its current buildings in Arlington, Virginia. NSF began the physical move in June 2017.

File Storage and the Relocation

NSF will have approximately 65 percent less space for file storage in the new building. Accordingly, NSF has several initiatives in place to reduce the number of paper files, including paper records, that it will have to transfer and store in the new building. These initiatives include continual contract services with a vendor to retire and scan paper records onsite; services with the relocation vendor to recommend and pilot an electronic records management system (ERMS) including scanning and digitizing paper records; and an agency-wide campaign since July 2016 with a goal to dispose of 500,000 pounds of excess supplies, equipment, paper, and trash before moving to the new building.

To decrease the amount of paper records to be moved to the new location, NSF issued a fixed price contract of \$504,144 with the relocation vendor to recommend and pilot an ERMS for two divisions and all of the Office of Budget, Finance and Award Management (BFA). An ERMS is an electronic repository for all NSF records that would allow NSF staff to search, sort, and retrieve NSF information. NSF's relocation contractor subcontracted the work to an offsite vendor, and the relocation contractor's project timeline estimated that approximately 3.8 million pages of paper documents were to be scanned by June 2016.¹ See Figure 1 for a timeline of the move contract and scanning/digitization project.

¹ NSF also has another contract with a vendor to retire and scan records onsite.



Figure 1: NSF Move Contract and Scanning/Digitization Timeline



Source: NSF OIG depiction of NSF-provided data

Records Management

The *Federal Records Act* defines Federal records as including “all recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.”² Managing Federal business records is an important responsibility of Federal agencies, which are required to establish and maintain records management programs in compliance with the *Federal Records Act*. The U.S. National Archives and Records Administration (NARA) is required to provide guidance and assistance to agencies to ensure compliance with records management requirements.

Within NSF, the Division of Administrative Services (DAS) records management official has agency-wide responsibility for records management. Within an individual NSF office, the NSF records custodian is responsible for records management duties, such as advising staff on records-related issues. Among the records custodians’ responsibilities are to work with the NSF records management official in determining which records in their division should be preserved and which should be temporary and in obtaining NARA’s approval for these record maintenance schedules.³

Implementation of Federal Records Management Requirements

In 2012, NARA and the Office of Management and Budget (OMB) issued *Managing Government Records Directive* (M-12-18) to reform Federal records management, policies, and practices. This directive requires agencies to manage all permanent electronic Federal records in an electronic format to the fullest extent possible by December 31, 2019. At Congress’ request, the U.S. Government Accountability Office (GAO) evaluated Federal agencies’ implementation of the directive and reviewed policies, guidance, and other documentation of actions taken by 24 selected Federal agencies, including

² 44 U.S.C. § 3301(a)

³ Record schedules provide mandatory instructions for the disposition of records when they are no longer needed by the agency.



NSF.⁴ In its May 2015 report, GAO recommended that NSF establish a date by which it will complete and then report to NARA on its plans for managing permanent records electronically and on its progress toward managing permanent and temporary e-mail records electronically; report to NARA on the identification of its permanent records in existence for 30 years or more; and complete the identification of unscheduled records stored at agency records storage facilities.

Inspection Purpose

We conducted this inspection to assess whether NSF has implemented procedures to decrease the amount of paper records moved to the new location. In conducting this inspection, we reviewed NSF's activities relating to efforts to reduce the amount of paper records and controls to ensure the safekeeping of agency records throughout NSF's records management initiatives.

Results of Inspection

NSF implemented some records management actions to reduce the amount of paper records moved to the new Alexandria headquarters. DAS hired a new records management official in November 2015. We also found appropriate controls were in place to ensure the safeguarding of information provided to the two contractors for records management services. In addition, GAO determined that NSF has taken corrective action to address its recommendations in its 2015 report and closed all recommendations in March 2017.

Although NSF has made progress to decrease paper records, NSF's planning has not been sufficient and more work is needed. Thus, NSF may have to store or move more paper records than it planned, and there is a risk that the scanning/digitization project may not be completed in an efficient manner. In addition, because only approximately 36 percent of NSF employees and 45 percent of records custodians⁵ have taken required records management training as of August 4, 2017, there is a risk that staff may inadvertently discard official records before the relocation. At the time of our fieldwork, NSF was in the process of updating the Employee Separation Clearance Form and the *Employee Onboarding and Separation Guide* to address records management. In June 2017, NSF finalized the form and the guide to include records management, reducing the risk that departing employees may improperly dispose of official records.

NSF Has Implemented Some Records Management Actions, But Planning Was Not Sufficient

We reviewed whether NSF implemented its records management and digitization efforts to decrease the amount of paper moved to the new location. We found that NSF took some action to organize its records management and digitization efforts prior to the move. Specifically, DAS hired a new records management official in November 2015, who has met with directorates and divisions on a continual

⁴ GAO-15-339, *Additional Actions Are Needed to Meet Requirements of the Managing Government Records Directive*, May 14, 2015

⁵ Excludes OIG staff.



basis since July 2016 to offer assistance with updating record schedules and preparing documents for the scanning/digitization project.

However, NSF's planning for the scanning and digitization project has not been sufficient to reduce the amount of paper records moved to the new location. We noted the following concerns:

- NSF did not perform an accurate inventory of paper records prior to starting the scanning and digitization project. NSF advised that the initial estimate of 3.8 million pages of paper records for the two divisions and BFA was based on a count of file cabinets, and the fixed price contract was based on this estimate. However, NSF advised that some of these cabinets did not contain paper documents when it began to inspect the cabinets. Therefore, NSF had to revise its estimate of paper records that needed to be scanned for the two divisions and BFA, and NSF modified and re-scoped the NSF relocation contractor contract to include scanning of documents from additional directorates and divisions. As of May 2017, NSF did not have an accurate inventory of paper records remaining at NSF that need to be scanned.
- The NSF relocation contractor's project timeline estimated that approximately 3.8 million pages of paper documents were to be scanned by June 2016. As of January 2017, the contractor had scanned 712,951 pages. In July 2017, NSF extended the contract to March 2018.
- While NSF has updated two records schedules for awards to allow for electronic media,⁶ it has not updated many of its other records schedules to obtain NARA's approval to modify its disposition authority to allow it to destroy the corresponding paper records once they are scanned. As a result, NSF's relocation contractor was notified not to destroy any of the paper records even after they were scanned.
- NSF directed the relocation contractor not to proceed with piloting the relocation contractor's ERMS recommendation, as NSF had decided to use a module of Documentum, NSF's existing ERMS. Instead, the contractor was instructed to simply scan documents for all NSF directorates and save them to portable hard drives.
- Several divisions had not packed paper documents for the contractor to scan as they were unsure what records should be scanned and how to pack them.
- The Division of Information Services (DIS) has not completed full quality control testing of the NSF relocation contractor's scanned digital files to determine if they can be entered into Documentum and are searchable.

Senior Management Support and a Well-planned System/Structure Should Be in Place

GAO's *Standards for Internal Control for the Federal Government* states that the agency's "tone at the top" — its senior management — should be a "driver" to effective internal control. A strong "tone at the top" to support internal control can ensure that control activities are appropriately implemented, and communication and coordination is effective in achieving desired agency results.

⁶ NSF advised that a large part of its official records are award files, and these records have been in electronic form since 2006.



By law, all agency-specific record schedules must be submitted to and approved by NARA.⁷ According to NARA officials, there is a heightened risk of loss and damage to Federal records when they are moved. They stated that to mitigate this risk, agencies should inventory all records prior to moving and agencies should also apply existing approved records schedules to execute disposition on any records that are eligible for transfer to NARA or destruction.

According to NARA officials, records also should be scanned and digitized with a well-planned system/structure in which they will be stored. Typically, an agency secures an ERMS and configures it to reflect its records schedules and organizational structure prior to scanning a large amount of records.

NSF Did Not Initially Coordinate Scanning Effort Efficiently

According to Office of Information and Resource Management (OIRM) senior officials, they have reprioritized the conversion of paper records to electronic records to focus on the urgency of the planned physical move to Alexandria. They stated that this was a decision based on both the constraints on time from the physical move and the requirement that records do not need to be digitized until December 2019. NSF officials have also advised that the physical move is not dependent on the scanning and digitization of paper records, although they would like to decrease the amount of paper records to move.⁸

When the relocation contractor's task order was signed, there was not sufficient communication and coordination between DAS, which manages the effort; DIS, which manages NSF's information technology infrastructure; and the NSF directorates. Before the relocation contractor's task order was issued in September 2015, DAS and DIS had not sufficiently coordinated efforts to fully evaluate and determine if NSF's Documentum system could continue to be NSF's ERMS. In addition, when the offsite subcontractor was ready to start the pilot, DAS did not sufficiently communicate with directorates on record retention schedules, what documents should be scanned and digitized, and how to prepare documents for shipment.

NSF Risks Not Completing Scanning/Digitization Efforts Efficiently

Because of NSF's delays in providing the contractor documents and the re-scoping of the contract, there is a heightened risk that the scanning/digitization project may not be completed in an efficient manner. In addition, DIS and DAS have not entered the scanned files into Documentum, so NSF has no assurance that the scanned documents can be transferred properly or are searchable.⁹ Because NSF is not destroying any documents scanned by the subcontractor, the paper records are being sent either back to NSF or to NSF's storage facility. As a result, NSF will have to store or move more non-digitized paper records than planned. In addition, there is a risk that paper Federal records may be lost, damaged, or inadvertently discarded as they are moved to and from the contractor and from NSF's old location to its new headquarters.

⁷ 44 U.S.C. §§ 3303, 3303(a)

⁸ The NARA deadline for full electronic permanent records is December 31, 2019 (to the fullest extent possible).

⁹ A key aspect of digitized records is that they are viewable and easily searchable.



NSF Has Sufficient Controls for Records Safekeeping by Contractors, But Can Improve Controls for NSF Staff

We found appropriate controls were in place to ensure the safeguarding of information provided to contractors. For example, NSF obtains a background check for the offsite contractors handling NSF documents and provides them NSF badges; the sub-contractor's delivery of the documents is secure point-to-point; and the sub-contractor's facility has security measures in place to ensure only NSF badged employees enter the scanning room. The offsite subcontractor is subject to the terms and conditions of the NSF relocation contract, including the security clauses. Further, our review of the contract of the onsite vendor that retires and scans records determined that it properly included a Contractor Security Clause that implements controls to ensure safekeeping of records.

However, NSF can improve its internal controls to ensure the safekeeping of NSF's records throughout NSF's records management and digitization efforts. Specifically, the majority of NSF staff have not completed NSF's online records management training; the training does not meet minimum NARA content requirements; and, at the time of our fieldwork, NSF did not have guidance on records management for departing employees and did not communicate to employees how to manage records immediately prior to their departures.

Most NSF Staff Have Not Taken Required Records Management Training

Managing recorded information is an important responsibility of every Federal agency. In accordance with the *Federal Records Act*; NARA's implementing regulations; and OMB Circular A-130, *Managing Information as a Strategic Resource*, revised July 28, 2016, agencies are required to institute records management programs, including appropriate guidance and training for employees, and NARA should guide and assist agencies to ensure they comply with records management requirements and provide records management training.

All agency staff that create and handle Federal records must receive records management training, as appropriate. NARA Bulletin 2017-01, issued November 29, 2016, provides the minimum requirements for agency records management training programs. The Bulletin states that agencies must provide records management training to all agency personnel that create, receive, access, or use Federal records on behalf of the agency. All agency personnel with email accounts or IT network resource access must complete records management training within 60 days of employment and must complete annual refresher training.

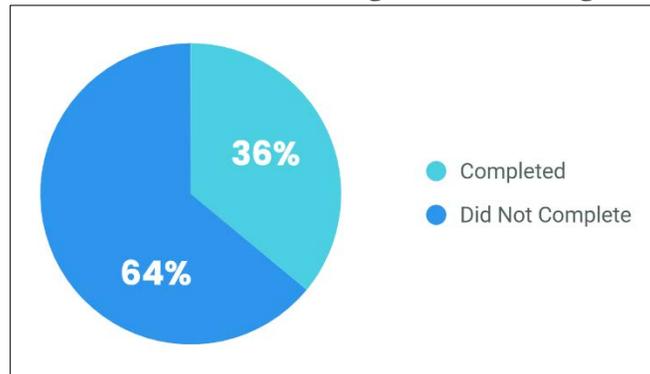
However, the majority (approximately 64 percent) of NSF staff have not completed NSF's online records management training as of August 4, 2017, as shown in Figure 2.¹⁰ Given the number of NSF

¹⁰ These amounts exclude NSF OIG staff because OIG required all staff to take records management training. As of August 2017, NSF OIG has an approximately 99 percent completion rate.



temporary staff members appointed under the *Intergovernmental Personnel Act*¹¹ who may have no experience managing Federal records, such training is especially important. In addition, only 22 of 49 (approximately 45 percent) NSF records custodians completed the training as of August 4, 2017.

Figure 2: NSF Staff Completion of Required Online Records Management Training*



Source: NSF OIG depiction of NSF-provided data

*Numbers are approximate due to rounding and exclude OIG employees.

NSF Training Does Not Cover All Minimum Required Content Areas

The Bulletin also specifies the minimum required content areas for annual records management training, including but not limited to defining Federal records; providing an overview of Federal and agency-specific policies and record keeping requirements; and describing legal responsibilities for creation, maintenance, and disposition of records; stages of the records management life cycle; how and where to store Federal records; how to manage electronic records including email and social media; what to do with records when the employee departs; and where to get more information and agency contacts.

The NSF training course has not been updated to cover all minimum content areas required by NARA, especially describing how to manage records and nonrecord materials in email, social media, and other electronic records, and what to do with record and nonrecord materials when an employee leaves the agency.

NSF Has Not Made Records Management Training Mandatory

OIRM has not directed the NSF Academy, which provides training to NSF staff, to make the training course, “Records Management Training for Everyone,” mandatory for all NSF staff. Therefore, staff do not receive a reminder notification from the system of the need to take the course.

¹¹ NSF draws scientists, engineers, and educators from academia, industry, or other eligible organizations on rotational assignment to supplement its workforce. NSF uses the *Intergovernmental Personnel Act of 1970* as its primary way to bring in such staff.



Without ensuring that staff are being properly trained, NSF increases the risk of employees improperly handling, and possibly inadvertently discarding, Federal records during NSF's relocation to the new building and when leaving the agency. In addition, without training, directorates' staff will be unsure as to what records need to be packed for scanning and digitization for the contractor, resulting in further delays with the agency's efforts to reduce paper records before the move. Thus, directorates may be sending documents that are not official records to the contractor to be scanned, which could result in unnecessary costs, or destroying records that should be retained.

NSF Has Implemented Additional Controls to Ensure the Safekeeping of Agency Records for Departing Employees

When leaving Federal service, Government employees are to ensure all Federal records are properly managed and preserved until their authorized disposition. NARA's 2016 records management guide¹² states employees should contact their agency's records management staff to determine if there is an exit clearance process already in place at the agency. Furthermore, the removal of information is subject to review by agency officials. If an agency has an exit clearance process in place, the employee should receive guidance on how to handle the agency records prior to their leaving Federal service.

According to NARA, many agencies have records management included in their exit clearance processes. NARA provided us with copies of two examples of employee exit forms used by agencies that included records management. During this discussion, the employee is asked what records he or she may have created or was responsible for maintaining. This discussion helps to identify agency records that may exist and provide guidance on where to transfer the records or how to dispose of them.

At the time of our fieldwork, NSF did not have guidance on records management for departing employees and did not communicate to employees how to manage records immediately prior to their departures. For example, the NSF Employee Separation Clearance Form and the *Employee Onboarding and Separation Guide* did not require employees to review their records or have a discussion with the records officer prior to departure. However, most of the directorates we interviewed stated that they knew to work with departing employees to identify records based on prior experience. This allowed for a transition period or transfer of records, but it was an ad hoc practice rather than a formal, required process.

The Division of Human Resource Management updated the employee separation form to include records management in May 2017. In June 2017, NSF sent out an email to NSF staff with an updated NSF Employee Separation Clearance Form and the *Employee Onboarding and Separation Guide*, which now address records management of departing employees.

Risk of Improper Records Disposal Exists

Because many NSF staff have not taken records management training, there is a risk that employees may improperly dispose of NSF official records prior to the move. This risk is further increased because

¹² *Documenting Your Public Service*, NARA, 2016 Web Edition, updated October 25, 2016



some of those employees may retire or leave NSF before the move and may not know how to handle Federal records in their possession as they depart. Agency employees should be properly trained on how to identify and handle records. Furthermore, the updated clearance documents should be fully implemented to aid directorates and employees in the employee separation process.

NSF Has Adequately Addressed GAO's 2015 Report Concerns

In 2012, NARA and OMB issued the *Managing Government Records Directive*, which set goals for Federal agencies to meet as an effort to address a 2011 Presidential memorandum on managing government records. Furthermore, the Directive required agencies to manage all permanent electronic records in an electronic format by December 31, 2019.

GAO evaluated NSF's implementation of the directive. Based on its review, GAO reported¹³ that NSF required additional work to implement the NARA and OMB directive. GAO provided NSF with recommendations to ensure the directive requirements were met. GAO recommended that the Director of NSF take the following four actions:

1. Establish a date by which the agency will complete, and then report to NARA, its plans for managing permanent records electronically.
2. Establish a date by which the agency will complete, and then report to NARA on, its progress toward managing permanent and temporary e-mail records in an electronic format.
3. Report to NARA on the identification of its permanent records in existence for 30 years or more, to include when no such records exist.
4. Complete the identification of unscheduled records stored at agency records storage facilities.

We reviewed NSF's actions to address GAO's recommendations and found that NSF had met the requirements. To address GAO's recommendations, NSF took the following steps:

1. NSF submitted a plan to NARA, which provided that NSF would implement an electronic records management system and digitize hard copy records by December 31, 2019.
2. NSF established and met the target date for implementation of a new email Capstone policy, allowing the agency to manage permanent and temporary e-mail records in an electronic system by December 31, 2016. However, this policy has not received NARA approval.¹⁴
3. NSF sent a letter to NARA stating it does not have permanent records in existence for 30 years or more.
4. NSF conducted a review of records stored at facilities and sent a report to NARA.

In March 2017, GAO determined that NSF has taken corrective action to address the recommendations and now considers the recommendations closed.

¹³ GAO-15-339, *Additional Actions Are Needed to Meet Requirements of the Managing Government Records Directive*, May 14, 2015

¹⁴ Our July 6, 2017 report, NSF OIG 17-2-009, *NSF Could Strengthen Key Controls over Electronic Records Management*, provides additional discussion on this issue.



Conclusion

NSF implemented some records management actions to reduce the amount of paper records moved to the new Alexandria headquarters. NSF has taken corrective action to address the recommendations in GAO-15-339, *Additional Actions Are Needed to Meet Requirements of the Managing Government Records Directive*, and updated its Employee Separation Clearance Form and the *Employee Onboarding and Separation Guide* to include records management. However, NSF has more work ahead to decrease paper records, complete its scanning/digitization project in an efficient manner, and ensure all NSF employees complete the required records management training.

Recommendations

We recommend the Head of OIRM:

1. Communicate the importance of records management in light of NSF's move to the new building through means such as the NSF Weekly Wire and NSF Relocation Office Town Halls.
2. Complete the quality control test on NSF's relocation contractor's scanned digital files to determine if they can be entered into Documentum and are searchable.
3. Continue working with various divisions to update their record schedules and send them to NARA for approval.
4. Continue working with various divisions to pack paper records for the relocation contractor to scan and digitize.
5. Work with the NSF Academy to:
 - a. update the records management training to incorporate all minimum content material required by NARA Bulletin 2017-01;
 - b. require that all NSF staff complete the training, and issue reminder notices; and
 - c. implement an annual training cycle for records management training.

OIG Evaluation of Agency Response

NSF generally agreed with our recommendations and included actions already completed and planned to improve records management throughout the agency. NSF plans to continue to update records schedules, inventory and scan paper files, update records management training, and require annual training for all staff. Regarding recommendation 2, NSF responded that it completed a quality control test on the contractor's scanned files in April 2016 and successfully uploaded 7,000 files to Documentum. Because NSF had not previously shared this test information, we requested additional documentation. NSF officials informed us that its April 2016 test was limited to a small number of files



from one office. In addition, the 7,000 scanned files were limited to one NSF office. Officials from that office told us that it reviewed only the digital file on the portable hard drive and did not review the Documentum file. This testing was not sufficient given the large number of pages that have been scanned and remain to be scanned among many directorates and divisions. Therefore, NSF should continue quality control testing to include more files from directorates.

We have included NSF's response to this report in its entirety as Appendix A.



Appendix A: Agency Response

NATIONAL SCIENCE FOUNDATION
OFFICE OF INFORMATION AND RESOURCE MANAGEMENT
ARLINGTON, VA 22230

MEMORANDUM

DATE: September 5, 2017

TO: Mark Bell
Assistant Inspector General for Audits
Office of Inspector General

FROM: Dr. Joanne Tornow 
Office Head, Office of Information and Resource Management and Chief
Human Capital Officer

SUBJECT: Response to Official Draft Report, *NSF's Relocation to its New
Headquarters Location – Records Management*

NSF appreciates the opportunity to respond to the Office of Inspector General (OIG) Official Draft Report, *NSF's Relocation to its New Headquarters Location – Records Management*, dated August 10, 2017. As the OIG Report recognized, NSF has already completed corrective actions responsive to an earlier report on records management by the Government Accountability Office (GAO). NSF generally agrees with the OIG recommendations for continuing to improve records management at the agency. To that end, NSF has begun to take actions responsive to the OIG's recommendations, as follows:

With respect to Recommendation 1, "Communicate the importance of records management in light of NSF's move to the new building through means such as the NSF Weekly Wire and NSF Relocation Office Town Halls," NSF continues to communicate the importance of records management to NSF's staff, particularly in support of our move to the new NSF headquarters in Alexandria, VA, which is currently underway. Thus far, OIRM has conducted 12 records reduction kick-off meetings throughout the Foundation, briefings to the Administrative Management Group and the Directorate Liaison Group, presentations at multiple Directorate all-hands meetings, and a video interview posted on the NSF Relocation website. As of August 7, 2017, the Records Management staff began presenting an overview of general records management responsibilities at NSF's biweekly New Employee Orientation sessions. We will continue to communicate the importance of records management to the entire agency.

With respect to Recommendation 2, "Complete a quality control test on NSF's relocation contractor's scanned digital files to determine if they can be entered into Documentum and are searchable," OIRM's Divisions of Administrative Services (DAS) and



Information Services (DIS) completed a quality control test on NSF's relocation contractor's scanned digital files in April 2016. The scanned files were uploaded with zero errors. To date, the agency has uploaded over 7,000 scanned files to Documentum with zero errors and has determined the files are searchable. NSF will continue to upload scanned files into Documentum. While the OIG noted in the draft report that we did not perform an accurate inventory of our paper records prior to starting the scanning and digitization project, OIRM conducted a second inventory prior to initiating the records reduction kick-off meetings mentioned above in order to be able to tailor the guidance and assistance we provided to each division.

With respect to Recommendation 3, "Continue working with various divisions to update their record schedules and send them to NARA for approval," NSF is currently developing new records schedules. We will continue to work with NSF Directorates/Offices to update their record schedules and send to NARA for approval, with a goal of meeting OMB's M-12-18, *Managing Government Records Directive*, requirement for managing our permanent Federal records electronically to the fullest extent possible by December 31, 2019.

With respect to Recommendation 4, "Continue working with various divisions to pack paper records for the relocation contractor to scan and digitize," NSF has scanned over 800 boxes of hard copy files to reduce the amount of paper in the agency that is being moved to the new headquarters.

With respect to Recommendation 5, "Work with the NSF Academy to: (a) update the records management training to incorporate all minimum content material required by NARA Bulletin 2017-01; (b) require that all NSF staff complete the training, and issue reminder notices; and (c) implement an annual training cycle for records management training," NSF has updated its records management training through the NSF Academy to incorporate all minimum content material required by NARA Bulletin 2017-01, including how to manage records and non-record materials in email, social media, and other electronic records. The training also includes instructions on what to do with record and non-record materials when an employee leaves the agency. NSF is in the process of developing a policy and procedures for implementing mandatory annual records management training for all staff.

NSF appreciates the OIG's feedback to the agency and its identification of opportunities to improve records management in support of the NSF's move to the new headquarters. We look forward to developing a corrective action plan to respond to the OIG's recommendations. Questions about our response can be directed to Peggy Gartner, Branch Chief, Information Dissemination at pgartner@nsf.gov.



Appendix B: Objectives, Scope, and Methodology

This is one of a series of inspections of NSF's oversight of its relocation to its new headquarters in Alexandria, Virginia. We conducted this inspection to determine if:

1. NSF implemented procedures to decrease the amount of paper records moved to the new location.
2. NSF implemented appropriate internal controls to ensure the safekeeping of NSF's records throughout NSF's records management and digitization efforts.
3. NSF implemented internal controls to ensure safekeeping of NSF records by departing employees.
4. NSF adequately addressed the concerns raised in GAO's May 2015 report on managing government records.¹⁵

To answer our objectives, we:

- Interviewed officials in NSF's OIRM to gain an understanding of the records management actions taken by the agency prior to the move to Alexandria, Virginia. Specifically, we met to learn more about the records management policies and procedures, scanning and digitization project, and the ERMS.
- Researched and reviewed OMB, NARA, and NSF guidance on records management.
- Interviewed NARA officials to gain an understanding of required records management practices.
- Met with various NSF directorates and divisions to identify internal controls to ensure safekeeping of NSF records by departing employees. We also interviewed recent senior level departing staff.
- Interviewed NSF's relocation contractor and its offsite subcontractor to discuss the scanning and digitization project and their controls to ensure safekeeping of NSF's records.
- Examined NSF contract files of the relocation contractor and the onsite vendor that scans and retires NSF records to gain an understanding of the steps NSF took to implement the contracts and to identify the need for the scanning and digitization project.
- Observed the offsite subcontractor's collection of documents at NSF headquarters and visited the subcontractor's facility to identify internal controls to ensure the safekeeping of records.
- Reviewed the May 2015 GAO report to identify recommendations made to NSF. We then assessed NSF's actions to determine if they adequately addressed the recommendations.
- Analyzed NSF's records management training data to identify the number of NSF employees who have not completed the course.
- Reviewed NSF's records management training course material for compliance with NARA recommended subject matter.

¹⁵ GAO-15-339, *Additional Actions Are Needed to Meet Requirements of the Managing Government Records Directive*



We conducted this inspection from October 2016 through May 2017 under the authority of the *Inspector General Act of 1978*, as amended, and according to the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency in January 2012.

We did not identify any instances of fraud, illegal acts, violations, or abuse.

We held an exit conference with NSF management on May 5, 2017.



Appendix C: NSF Corrective Actions – GAO-15-339 Report

GAO Recommendation	How NSF Addressed the Recommendation	Date NSF Provided Information to NARA
Establish a date by which the agency will complete, and then report to NARA, its plans for managing permanent records electronically. The plan should describe, among other things, how permanent electronic records are currently captured, retained, searched, and retrieved; plans to digitize permanent records currently in hard-copy format or other analog formats; plans to manage all permanent electronic records in electronic format, including how the plans will be implemented; and challenges the agency faced in achieving the requirement of managing all permanent electronic records in an electronic format.	NSF submitted a Senior Agency Official Report to NARA that included a plan to address the various requirements of the recommendation by December 31, 2019.	February 22, 2016
Establish a date by which the agency will complete, and then report to NARA on, its progress toward managing permanent and temporary e-mail records in electronic format, to include the agency's ability to retain e-mail records in an electronic system that supports records management and litigation requirements, including the capability to identify, retrieve, and retain the records for as long as they are needed.	NSF submitted a Senior Agency Official Report to NARA that included a plan to address the various requirements of the recommendation by December 31, 2016.	February 22, 2016
Report to NARA on the identification of its permanent records in existence for 30 years or more, to include when no such records exist.	NSF sent a letter to NARA reporting that it does not have such permanent records.	October 28, 2015
Complete the identification of unscheduled records stored at agency records storage facilities.	NSF emailed NARA the requested information.	October 30, 2015



Appendix D: OIG Staff Acknowledgments

Wendell Reid, Audit Manager; Vashti Young, Senior Management Analyst; Elizabeth Goebels, Director, Performance Audits; Marie Maguire, Deputy Assistant Inspector General for Audit; Elizabeth Argeris Lewis, Communications Analyst; and Jae Kim, Independent Report Referencer, made key contributions to this report.



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