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Audit of NARA's Off-boarding Process (24-AUD-03)

March 14, 2024






Inspector General

March 14, 2024

TO: Dr. Colleen Shogan
Archivist of the United States

FROM: Dr. Brett M. Baker
Inspector General 

SUBJECT: *Audit of NARA's Off-boarding Process*
OIG Report No. 24-AUD-03

Attached is the Office of Inspector General's final report of our audit of NARA's Off-boarding Process. The report contains seven recommendations to strengthen management and internal controls over the off-boarding process for separating employees, contractors, and volunteers. Agency staff indicated they had no comments for inclusion in this report.

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 letter. 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 with oversight responsibility over NARA.

We appreciate the cooperation and assistance NARA extended to us during the audit. Please contact me with any questions.

Attachment

cc:

William Bosanko, Deputy Archivist of the United States
Merrily Harris, Executive Secretariat
Gary M. Stern, General Counsel
Micah Cheatham, Chief of Management & Administration
Jay Trainer, Acting Chief Operating Officer

Damon Nevils, Acting Chief Acquisitions Officer
Valorie Findlater, Chief Human Capital Officer
Collen Murphy, Chief Financial Officer
Sheena Burrell, Chief Information Officer
Mark Smith, Executive for Business Support Services
Kimm Richards, Accountability
Kurt Thompson, Senior Program Auditor
Teresa Rogers, Senior Program Auditor
United States Senate Homeland Security and Governmental Affairs Committee
United States House of Representatives Committee on Oversight and Accountability

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Executive Summary

Audit of NARA's Off-boarding Process

OIG Report No. 24-AUD-03

March 14, 2024

Why Did We Conduct This Audit?

The National Archives and Records Administration (NARA) has over 2,500 employees, volunteers, and contractors working in 43 facilities nationwide. When an individual resigns, retires, or terminates their service with NARA, or transfers to another office or facility within NARA, NARA must ensure the individual accounts for any outstanding financial responsibilities and accountable items. As a result of COVID-19, NARA implemented new guidance to execute off-boarding controls in a maximum telework status.

We conducted this audit to assess the effectiveness of controls over the off-boarding process for separating and reassigned employees, contractors, and volunteers.

What Did We Recommend?

We made seven recommendations to strengthen NARA's management and internal controls over its off-boarding processes.

What Did We Find?

NARA exit clearance processes need improvement. Specifically, we found instances in which information technology (IT) system access and Personnel Identification Verification (PIV) cards were not timely disabled, exit clearance documents were not always maintained, financial obligations were not timely identified, and accountable property of separated or reassigned individuals was not adequately tracked. Overall, these conditions existed because NARA did not have adequate oversight and internal controls in place to ensure the exit clearance process was operating as intended. The Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* states management should design control activities to achieve objectives and respond to risks.

Without effective internal controls over NARA's off-boarding process, there is an increased risk of loss, misuse, unauthorized access to, or modification of government information and property, and unauthorized access to NARA's facilities and IT systems.

Summary of Recommendations

Finding 1: NARA Controls Over the Off-boarding Process Need Improvement

Number	Recommendation	Responsible Office
1	Implement an automated process, which notifies all relevant IT system owners of pending separations and reassignments.	Chief of Management and Administration
2	Determine whether individuals who departed NARA since April 27, 2020 still have access to related IT systems. Ensure IT system access for these individuals has been terminated.	Chief of Management and Administration
3	Adopt a specific time-frame requirement for termination of Personal Identity Verification cards in accordance with the Federal Information Processing Standards.	Chief of Management and Administration
4	Evaluate the process and/or definition for reassignments as defined in NARA 215 to ensure it meets the business needs of National Personnel Records Center's Core environment.	Chief of Management and Administration
5	Revise NARA 215 requirements for outstanding debt obligations for separating individuals.	Chief of Management and Administration
6	Update and implement NARA 215 requirements to establish clear reporting lines among those units with off-boarding and property management duties.	Chief of Management and Administration
7	Ensure communication of revised NARA 215 with NARA Clearance Officials.	Chief of Management and Administration

Background

NARA's off-boarding processes comprise of exit clearance procedures implemented before and during COVID-19.¹ These procedures apply to all NARA employees, contractors, volunteers, and interns who separate from NARA or are reassigned to a different NARA organization or location; all separating agency declassification reviewers (Federal employees and contractors); and any separating Foundation staff who have access to NARA facilities and property.

NARA 215, *Exit Clearance Procedures for Separating or Reassigned Individuals* provides the primary procedures for ensuring that all individuals ending their work or volunteer relationship with NARA, or relocating to a different office or facility within NARA, account for any outstanding financial responsibilities and accountable items for which the individual is responsible. Examples of accountable items include government purchase cards, keys, proximity cards, NARA Personal Identity Verification (PIV) cards, laptop computers, and cell phones. NARA must also ensure that separated or (if applicable) reassigned individuals' access to NARA IT systems are terminated in compliance with federal regulations.

Many of the exit clearance responsibilities cross-cut multiple NARA offices and divisions. For example:

Office of Human Capital (H) maintains the information captured from the online exit clearance notification form in a spreadsheet and prepares biweekly reports of all separations and reassignments from the previous pay period.

Business Support Services, Security Management Division (BX) oversees the collection of security items, such PIV cards, from separating or reassigned employees and annotates the destruction of PIV cards in USAccess.²

Business Support Services, Facilities and Personal Property Management Division (BF) directs the nationwide property management program through oversight of property accountable officers; develops, implements, and enforces all necessary policies and procedures to properly manage, safeguard, and account for Government property valued over \$3,500.

Information Services, IT Operations Division, End-User Services Branch Chief (IO) tracks accountable property valued under \$3,500.

¹ NARA 215, *Exit Clearance Procedures for Separating or Reassigned Individuals*, dated May 1, 2012, and NARA Notice 2020-106: *Changes to Exit Clearance Procedures to Respond to COVID-19*.

² USAccess is a U.S. General Services Administration (GSA) program that administers Federal credentialing services.

Office of General Counsel (NGC) provides post-employment information to all separating employees on request.

Office of the Chief Acquisition Officer (Z) is responsible for designating Contracting Officer Representatives (CORs) who have oversight responsibilities for contractor exit clearance procedures.

Office of the Chief Financial Officer (X) serves as the principal liaison with the accounting services provider, and provides oversight for cash management, credit management, debt collection, and property and inventory management and control.

Other officials have additional roles and responsibilities. These include NARA IT system owners responsible for terminating access to IT systems used within NARA where the loss of information or compromise of access presents a significant risk to the agency. NARA Property Accountability Officers must document receipt of accountable property, such as a laptop assigned to the separating or reassigned individual and report the change of custody to BF. NARA Clearance Officials who initiate the Federal Personnel Payroll System (FPPS) actions for an employee separation and submit the online exit clearance notification form. Lastly, separating or reassigned individuals and their Clearance Official (i.e., supervisor, COR, Sponsor, or Administrative Officer) work together throughout the off-boarding process, ensuring timely notification of responsible offices, arranging exit interviews, and returning any accountable property.

On April 27, 2020, NARA implemented changes to the exit clearance procedure to respond to COVID-19. As a result, Clearance Officials were no longer required to separately notify stakeholders of the separation or reassignment, except for individuals who have security clearances, submitted financial disclosure forms in the last 12 months, or planned to work for a NARA contractor. These changes established an online exit clearance notification process while NARA operated under “maximum telework.” On June 9, 2021, NARA issued an update to its off-boarding practices requiring separating individuals to return Government property in their possession, except where extenuating circumstances prevented it.

Audit Results

Finding 1. NARA Controls Over the Off-boarding Process Need Improvement

NARA exit clearance processes for separating or reassigned individuals need improvement. Specifically, we found instances in which information technology (IT) system access and Personnel Identification Verification (PIV) cards were not timely disabled, exit clearance documents were not always maintained, financial obligations were not timely identified, and accountable property of separated or reassigned individuals were not adequately tracked. Overall, these conditions existed because NARA did not have adequate oversight and internal controls in place to ensure the exit clearance process was operating as intended. The Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* states management should design control activities to achieve objectives and respond to risks. Without effective internal controls over NARA's off-boarding process, there is an increased risk of loss, misuse, or unauthorized access to, or modification of government information and/or property, and unauthorized access to NARA's facilities and IT systems.

IT Systems Not Timely Disabled

NARA did not always timely disable access to IT systems for separated and reassigned employees. This occurred because the notification processes in which NARA implemented before and after COVID-19 did not timely notify all NARA IT system owners of recent departures and reassignments. As a result, there is an increased risk that NARA IT systems may be subject to unauthorized access and potential misuse or abuse from delays in disabling the user accounts of separated or reassigned individuals.

NARA 215 states that after receiving an email of terminations and reassignments from the Clearance Official, responsible NARA offices should immediately take the necessary action to terminate individuals access on the date the employee departs or was reassigned. Moreover, the federal requirement NIST SP 800-53 Rev. 5 *Security and Privacy Controls for Information Systems and Organizations* states that upon termination of individual employment system access should be disabled within the organization's defined time-period.

In April 2020, NARA issued NARA Notice 2020-106 *Changes to Exit Clearance Procedures to Respond to COVID-19*. Before the new process, NARA Clearance Officials were responsible for manually completing exit clearance forms and individually notifying departments with separation or reassignment responsibilities.

Afterwards, Clearance Officials submitted off-boarding information using an electronic form and the automated notification occurred once they validated³ the separation or reassignment online.

To determine whether NARA timely disabled the IT access of separated employees, first we selected 11 NARA IT systems then compared the system disabled dates to the individuals' separation dates. Our audit sample included 13 separations and 10 reassignments. Of the 13 separated individuals, 5 individuals did not have their IT system access disabled timely during our review. (See Table 1 - samples 6, 8, 9, 17, 21) Because some separated individuals had access to more than one IT system, we assessed their access disabled dates for each IT system. (See Table 1 - samples 6, 8, 9).

Table 1: Number of days to disable access to IT systems for separated NARA employees.

Sample	IT System	Separation Date	Access Disabled Date	Time Lapsed (Days)
6	ARCIS	1/18/2020	2/13/2020	26
	CMRS		1/3/2022 ⁴	716
8	ARCIS	3/14/2020	6/4/2020	82
	CMRS		8/27/2020	166
9	ARCIS	1/18/2020	1/29/2020	11
17	VSS	6/20/2020	6/30/2020	10
21	ENOS/HMS	2/15/2020	7/25/2022 ⁵	891

Source: OIG analysis of NARA System Owners' data.

We also examined NARA's notification process for alerting IT system owners of recent separations and reassignments. We found that only two of NARA's IT system owners received automatic notifications of separations. NARA did not include the other nine IT system owners in the automated notifications list. According to NARA guidance, IT system owners who are not automatically notified must rely on a bi-weekly NARA Departure Report, which lists all individuals who separated from NARA or were reassigned during that pay period. However, not all of NARA's IT system owners received the departure report. (See Table 2)

³ After submitting the electronic exit clearance form, the Clearance Official is sent an email to confirm submission of the separation or reassignment action. Upon validation of the action the automatic notifications are sent to offices that require exit interviews and offices with program responsibility for government property or financial management.

⁴ Sample 6 separated from NARA on January 18, 2020 and returned as a volunteer on approximately January 3, 2022. The individual separated from NARA again on March 16, 2022. NARA did not have documentation to support CMRS account access being disabled after the initial separation date, however NARA had documentation to support that CMRS account access was disabled timely on March 16, 2022, the same day of the final separation date.

⁵ The HMS system has a feature to disable user accounts 90 days after the last login date which was 2/12/2020. However, this was stopped due to the pandemic and the account was not disabled until 7/25/22.

Table 2: NARA Off-boarding Notifications for IT System Owners.

NARA IT System	Online Notification	Bi-Weekly ⁶ Report
CMRS		✓
ENOS HMS		✓
ERA Core GSS		✓
ERA 2.0		✓
VSS		✓
PRISM		✓
ECRM		
A2 PACS		✓
ARCIS	✓	✓
PMRS		
AERIC 13	✓	✓

Source: NARA IT System Owners.

The bi-weekly departure reports do not serve as adequate notifications because there could be a two-week lag in reporting of an individual’s separation or reassignment. More notably, some system owners do not receive any notification, such as the case for ECRM and PMRS. As a result, NARA must ensure its notification process is comprehensive and that mitigating controls are timely functioning; or NARA risks minimizing the protection of government information from loss, misuse, unauthorized access, or possible modification of such information.

PIV Cards Not Timely Terminated

While NARA generally terminated PIV cards for separating employees and contractors, additional controls are still needed to ensure that PIV cards are disabled timely. NARA’s off-boarding policies did not establish a deadline for disabling separated employees’ PIV cards in accordance with Federal standards.

Federal Information Processing Standards (FIPS) 201-2 requires agencies to collect and destroy PIV cards, if possible. This standard also states that if PIV cards cannot be collected, normal termination procedures shall be completed within 18 hours of notification. In January 2022, FIPS 201-3 superseded this policy and now requires agencies to complete normal revocation procedures within 18 hours of notification in the case of lost, stolen, or compromised PIV cards. Similar standards for federal contractors include the Federal Acquisition Regulation (FAR) Clause 52.204-9, which requires agencies to collect PIV cards when a cardholder is no longer eligible to possess one.

⁶ The bi-weekly report includes separations and reassignments of NARA employees based on the Federal Personnel Payroll System (FPPS) actions completed in the previous pay period.

NARA 215 states that separating individuals must surrender all government-owned items, such as, laptop computers, cell phones, government purchase cards, NARA PIV cards, identification cards, identification badges and credentials, to be cleared of those items for which they have been responsible. However, during pandemic-related building closures and “maximum telework” operating status, not all separating and reassigned individuals could return their items in accordance with NARA 215. In response to COVID-19, NARA issued new guidance requiring separated and reassigned individuals to retain and secure all NARA property in their possession until NARA returned to normal operations. Once normal operations resumed, the separated and reassigned individuals and their Clearance Officials were jointly responsible for arranging a date for the individual to return PIV badges in their possession. On June 9, 2021, NARA required separating individuals to return to NARA facilities, including closed facilities, to surrender Government property in their possession, thus reinstating normal termination procedures. However, NARA did not establish in either in NARA 215 or subsequent guidance the required time-frame of 18 hours for terminating PIV cards of separated or reassigned individuals.

A PIV card is an identification card issued by a federal agency that contains a computer chip, which allows the cardholder physical (accessing NARA locations) and logical access (accessing NARA a computer) to secured areas and information. Using the audit sample of 23 offboarded individuals, we compared the individual’s separation date with the date their PIV cards were terminated to determine how many days the PIV cards remained active. Based on this analysis, 10 out of 23 sampled individuals were reassigned and would have kept their PIV cards, 13 out of 23 individuals had separated from NARA and PIV cards should have been terminated within the required time-frame. However, we found that NARA did not timely terminate PIV cards for five of the 13 separated individuals when compared to the original standards outlined in FIPS 201-2. Further, there was no record that the PIV card was ever terminated for one of five individuals (Table 3).

Table 3: Number of days to Terminate PIV for separated NARA employees and contractors.

SAMPLE	SEPARATION DATE	PIV TERMINATION DATE	TIME LAPSED (DAYS)
9	1/18/2020	7/18/2021 ⁷	547
11	10/10/2020	10/19/2020	9
16	1/29/2021	2/1/2021	3
17	6/20/2020	6/24/2020	4
23	9/10/2020	9/14/2020	4

Source: NARA Security Management Division.

Although NARA CORs are responsible for ensuring contractor's PIV cards are terminated⁸, they stated they were not always timely notified by the contractor whenever an employee leaves. CORs are the technical representative of the contracting officer and the first to oversee that departing contractor employees return government-owned property to NARA. Without effective controls over PIV cards, there is an increased risk of theft, loss, or unauthorized access to NARA's facilities and systems.

Exit Clearance Documentation Not Adequately Managed

NARA did not always manage exit clearance documentation in accordance with records management best practices. For example, we found that Clearance Officials did not retain completed off-boarding checklists, consistently document records for reassigned individuals, or adequately track the receipt of electronic devices with access to Federal records. (See *Tracking Accountable Property*) These issues existed because NARA's off-boarding policy needs to be updated to ensure proper accountability and management of exit clearance records.

In FY 2021, NARA conducted an assessment of the policies and procedures of seven agencies' employee entrance/onboarding and exit/off-boarding processes. Some best practices that NARA outlined in the report included the other agency's use of off-boarding checklists. NARA stated checklists are simple but effective tools to ensure consistency when executing a task or process and can also be used to document compliance and completeness. NARA recommended that completed checklists be submitted for validation and tracking purposes to the Records Management program.

⁷ The sampled individual offboarded NARA on January 18, 2020 and returned to NARA on July 18, 2021. NARA had no record of terminating the individual's PIV card during the eighteen months of separation. This time-lapse resulted in 547 days from when the PIV card should have been terminated (i.e., separation date) until the individual onboarded and resumed an active PIV card as a NARA employee.

⁸ Based on the COR appointment letter, NARA CORs are responsible for knowing the employment status of the Contractor's employees working at the NARA sites(s). NARA CORs must also complete the online exit clearance notification form when they are notified of a contractor's separation or reassignment.

At NARA, Clearance Officials and separating or reassigned individuals also use an off-boarding checklist to facilitate the exit clearance process. These checklists include procedures such as reporting personnel actions in FPPS, tracking accountable property, and overseeing records management responsibilities. Although NARA provides the checklists to the Clearance Official and separating or reassigned individual, utilizing these checklists are not mandatory. In addition, checklist recipients were not required to submit or return completed checklists for tracking or validation purposes.

While NARA exit clearance procedures apply to individuals separating from NARA and those reassigned to a different office or facility within NARA, the Clearance Officials did not consistently follow the off-boarding procedures. We found that for three of the ten reassigned individuals in our audit sample, the Clearance Officials at the National Personnel Records Center (NPRC) did not initiate the off-boarding process as required. According to a NARA official, NPRC has a considerable amount of internal employee transfers, which occur when employees move among NPRC's Core⁹ groups to meet business needs. As a result, following NARA's current off-boarding processes for reassignments may be unsuitable for the Core environment at NPRC.

We also found that two reassigned employees in other NARA offices had their exit clearance procedures initiated erroneously. One NARA employee was temporarily moved into the wrong organization in error and actions were later processed to move the employee back. The other was reassigned within the same organization and would not have triggered an exit clearance notification form.

Even though NARA 215 defines a reassignment as the relocation of an individual to another office or facility within NARA, these errors may indicate that additional training of Clearance Officials are needed. In addition, NARA should evaluate whether the current definition of reassignments meets the business needs at NPRC.

Financial Obligations Not Timely Notified

Controls over notifying separating individuals of outstanding financial obligations needs improvement. While NARA identified the financial obligations of employees and contractors who separated from NARA, these individuals were not always timely notified. This occurred because the process for determining whether a separated individual had outstanding financial obligations happened after their departure date.

In NARA 215, it states that NARA must ensure that all individuals ending their work or volunteer relationship with NARA or relocating to a different office or facility within NARA,

⁹ NPRC Military work teams with slightly different focus areas but shared processes divided into Cores to manage the immense amount of work processed by NPRC.

account for any outstanding financial responsibilities. An individual separating from NARA must also satisfy any debt owed to NARA before leaving the agency. Of the 23 sampled individuals, we found three had incurred financial obligations. However, further testing identified that all three were notified of their debts after departing NARA. It may not be ideal to require off-boarding separating individuals to satisfy debt owed as part of the off-boarding process because this would have required NARA to issue prompt notification to ensure payments were obtained in full before departing the agency. Given this practice, we still found NARA took 175 to 223 days to notify the individuals of their outstanding debts. (See Table 4)

Table 4: Outstanding Debt Obligations of Separated Employees.¹⁰

Sample	Separation Date	Notification Date	Debt Amount	Time Lapsed (Days)
1	3/27/2021	10/14/2021	\$830.50	201
12	1/2/2021	8/13/2021	\$1,491.49	223
16	1/29/2021	7/23/2021	\$765.00	175

Source: NARA Office of the Chief Financial Officer.

NARA officials explained that the process for identifying and calculating debts of separating individuals can take up to at least four pay periods (i.e., two months). Once the debt has been identified, NARA Office of Chief Financial Officer, Accounting Policy and Operations (XA) receives the transferred bill information from the Interior Business Center (IBC)¹¹. XA will conduct an additional review to ensure the debt information reported by IBC matches their records, which adds additional time to the overall process.

However, this process could be streamlined so departing individuals would know if they had debt obligations before leaving the agency. Specifically, XA could determine preliminary debt amounts prior to IBC’s notification. Without improving timely notifications of separating individuals outstanding debts, NARA has an increased risk that monies owed to NARA may not be recouped.

Tracking of Accountable Property

NARA officials responsible for managing the agency’s accountable property were not consistently tracking it for separated or reassigned individuals. This issue occurred because off-boarding policies and guidance do not establish clear reporting lines among those units with off-boarding and property management duties. *GAO Standards for Internal Control in the Federal*

¹⁰ As of July 2023, Samples 1 and 16 fully paid their debts. Sample 12 agreed to repay in installments but later defaulted and is now in debt collection. As of July 2023, NARA has received \$870, or 58% of the \$1,491 owed.

¹¹ U.S. Department of the Interior IBC is a shared service provider of payroll operations and other payroll-related services to NARA.

Government states management should internally communicate the necessary quality information to achieve the entity's objectives. Without a comprehensive tracking process, NARA has limited assurance that valuable property was returned and accounted for, which may increase the likelihood of waste, fraud, or loss.

NARA guidance issued for separations and reassignments during COVID-19 required the Clearance Official¹² and the separating or reassigned individual to arrange for the return of all NARA property in their possession once NARA returned to normal operations. Individuals separating from NARA or reassigned between offices had to return the property to a NARA facility unless extenuating circumstances prevented it. If an individual did not give back the property assigned to them, they may be held financially liable for the value of that property.

Prior to an individual separating from NARA or being reassigned, they must sign NARA form 5028 *Personal Property Equipment Receipt/Turn/In Statement* and return any equipment to their Property Accountability Officer (PAO). The PAO documents receipt of property by signing form NA-5028, and in doing so, relieves the individual of their responsibilities, thereby assuming responsibility for the equipment. The PAO's track all aspects of personal property for assets assigned to their unit, maintain a record of the detailed location of each property item, and report to BF all property transactions.

After an individual surrenders Government-owned property, the PAO also completes NARA forms NA-6032 *IT Asset Pick-up and Delivery Receipt* and NA-5008 *Transfer of Personal Property* to document changes in custody. For IT equipment valued under \$3,500, NARA Information Service's End-User Service Branch (IO) manages the assets with NARA Facilities and Property Management (BF) to ensure proper accountability and reporting. BF oversees the NARA-wide Personal Property Program, which includes all NARA property regardless of value.

We found 16 of the 23 individuals in our audit sample were reported as having accountable property assigned. BF, IO, PAOs, and Clearance Officials maintained inconsistent information for the tracking of the property. For example, BF reported that 11 of the 16 individuals were assigned accountable property. The clearance officials only reported 12 and five clearance officials never responded to the inquiry. IO reported 14 and the PAOs reported 15. (See Table 5)

¹² For NARA employees, the Clearance Official is the supervisor. For NARA contractors, the Contracting Officer's Representative is the Clearance Official. An Administrative Officer may also serve as a Clearance Official if appointed for employees.

Table 5 - Accountable Property Assignments.

Sample	BF	IO	PAO	Clearance Official
1	Y	Y	Y	Y
2	Y	Y	Y	Y
3	Y	Y	Y	Y
4	N	N	N	N
5	Y	Y	Y	Y
6	N	N	N	N
7	N	Y	Y	N
8	N	N	N	* ¹³
9	Y	Y	Y	* ¹⁴
10	Y	Y	Y	Y
11	N	Y	Y	Y
12	Y	Y	Y	Y
13	Y	Y	Y	Y
14	Y	Y	Y	Y
15	N	N	N	N
16	Y	Y	Y	Y
17	N	N	Y	* ¹⁵
18	Y	Y	Y	* ¹⁶
19	N	Y	Y	Y
20	N	N	N	* ¹⁷
21	N	N	N	N
22	N	N	N	Y
23	N	N	N	N

Source: NARA Offices.

Without guidance that establishes clear reporting lines for tracking accountable property, NARA may not be able to ensure it collected all assigned accountable property upon an individual's separation, which may increase the risk of data loss or theft.

Recommendations

We recommend the Office of the Chief of Management and Administration:

Recommendation 1: Implement an automated process, which notifies all relevant IT system owners of pending separations and reassignments.

¹³ No reply from the clearance official.

¹⁴ No reply from the clearance official.

¹⁵ No reply from the clearance official.

¹⁶ No reply from the clearance official.

¹⁷ No reply from the clearance official.

Recommendation 2: Determine whether individuals who departed NARA since April 27, 2020, still have access to related IT systems. Ensure IT system access for these individuals has been terminated.

Recommendation 3: Adopt a specific time-frame requirement for termination of Personal Identity Verification cards in accordance with the Federal Information Processing Standards.

Recommendation 4: Evaluate the process and/or definition for reassignments as defined in NARA 215 to ensure it meets the business needs of National Personnel Records Center's Core environment.

Recommendation 5: Revise NARA 215 requirements for outstanding debt obligations for separating individuals.

Recommendation 6: Update and implement NARA 215 requirements to establish clear reporting lines among those units with off-boarding and property management duties.

Recommendation 7: Ensure communication of revised NARA 215 with Exit Clearance Officials.

Appendix A – Objective, Scope, and Methodology

Objective

The objective of this audit was to evaluate the effectiveness of controls over the off-boarding process.

Scope and Methodology

To accomplish our objective, we performed audit procedures at Archives II in College Park, Maryland, and from the auditors' approved COVID-19 public health emergency telework location from July 2021 to October 2023. The scope of audit included a universe of personnel that have separated or reassigned from January 1, 2020, through March 31, 2021.

We performed the following:

- Reviewed relevant guidance:
 - OMB Circular A-130, *Managing Information as a Strategic Resource*, issued July 28, 2016.
 - GAO *Standards for Internal Control in the Federal Government* (GAO-14-704G), issued September 2014.
 - Federal Acquisition Regulation (FAR), Clause 52.204-9, *Personal Identity Verification of Contractor Personnel*, issued January 2019.
 - Federal Information Processing Standards 201-2, *Personal Identity Verification (PIV) of Federal Employees and Contractors* (FIPS 201-2), issued September 5, 2013.
 - Federal Information Processing Standards 201-3, *Personal Identity Verification (PIV) of Federal Employees and Contractors* (FIPS 201-3), issued January 2022 superseding FIPS 201-2.
 - NARA 215, *Exit Clearance Procedures for Separating or Reassigned Individuals*, issued May 1, 2012.
 - National Institute of Standards and Technology (NIST), Special Publication 800-53 Revision 5, *Security and Privacy Controls for Information Systems and Organizations*, issued September 2020.
 - NARA Notice 2020-0106, *Changes to Exit Clearance Procedures to Respond to COVID-19*, issued April 27, 2020.
 - NARA COVID-19 Response, Fact Sheet 6, *Exit Clearance Procedures during COVID-19 Response*, issued April 27, 2020.
 - NARA COVID-19 Response, Fact Sheet 6.2, *Exit Clearance Procedures during COVID-19 Response*, issued June 9, 2021.

- Assessed internal controls to determine if they were sufficient to ensure NARA effectively offboarded separating and reassigned individuals.
- Reviewed outstanding issues and recommendations relevant to our audit objective, which were identified in previous internal or external reviews, audits, and evaluations.
- Conducted interviews with employees from Agency Services, Information Services, Business Support Services, Office of Chief Acquisition Officer, General Counsel, Office of Human Capital, George W. Bush Library and Museum, Jimmy Carter Library and Museum, Ronald Reagan Library and Museum, Archival Operations - San Bruno Federal Records Center, Riverside Federal Records Center and Security Management Division.
- Conducted surveys and reviews of exit clearance forms and assessed controls over tracking documentation to gain an understanding of NARA's practices to ensure personnel that separate from NARA or were reassigned return accountable items.
- Analyzed USAccess data to identify the total number of contractors terminated¹⁸ PIV cards that were reported as destroyed during the review period.
- Selected a sample of 11 NARA IT systems and issued a survey questionnaire to the system owners.
- Performed off-boarding controls testing of 23 individuals who separated from NARA or were reassigned during January 1, 2020, through March 31, 2021.

The scope of the audit testing included employees, contractors and volunteers who separated or were reassigned during the scope period. A judgmental sample of 23 individuals were selected for review from a total universe of 518 employees and 114 contractors and volunteers. Specifically, every 25th person identified from the universe was selected. A judgmental sample of 11 IT systems were judgmentally selected from a listing of 81 NARA IT systems. The systems were selected based on the age of the system, number of potential users, cloud-based status, risk-levels, and accessibility. All samples were randomly or judgmentally selected and cannot be projected to the intended population.

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

In planning and performing our audit, we identified the following components and underlying internal control principles, control objectives, and specific controls as significant to the audit objective.

¹⁸ Per FIPS PUB 201-2, PIV card termination is when an agency determines a cardholder is no longer eligible to have a PIV. The card should be collected, destroyed, and the data and keys needed for authentication should be invalidated to prevent any future use of the card for authentication.

- Control Activities – Implement Control Activities
- Information and Communication – Use of Quality Information

We assessed the design, implementation and/or operating effectiveness of these internal controls and identified deficiencies that we believe could affect NARA’s ability to effectively and efficiently offboard individuals. The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to aspects of these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Jewel Butler, Assistant Inspector General, Kimberly Boykin, Audit Director; Kurt Thompson, Senior Program Auditor (Co-Lead), Alicia McNair, Senior Program Auditor (Co-Lead); Teresa Rogers, Senior Program Auditor, Kimberly Nikraves, Senior Program Auditor, and Carol Seubert (Independent Referencer) made key contributions to this report.

Appendix B – Acronyms

A2 PACS	A2 Physical Access Control System
AERIC Title-13	Archival Electronic Records Inspection and Control (Census)
ARCIS	Archival Records Center Information System
BX	Business Support Services, Security Management Division
CMRS	Case Management Reporting System
COR	Contracting Officer’s Representatives
COVID-19	Novel Coronavirus Disease 2019
ECRM	Enterprise Customer Relationship Management
ENOS/HMS	Expanding NARA Online Services/Holdings Maintenance System
ERA Core GSS	Electronic Records Archives Core General Support System
ERA 2.0	Electronic Records Archives 2.0 System
FAR	Federal Acquisition Regulation
FPPS	Federal Personnel Payroll System
FIPS	Federal Information Processing Standard
GAO	United States Government Accountability Office
GSA	United States General Services Administration
H	Office of Human Capital
IBC	Interior Business Center
IO	Information Services, End-User Services Branch
I	Information Services
IT	Information Technology
NARA	National Archives and Records Administration
NGC	General Counsel
NIST	National Institute of Standards and Technology
NPRC	National Personnel Records Center
OIG	Office of Inspector General
OMB	Office of Management and Budget
PAO	Property Accountability Officer
PIV	Personal Identification Verification
PMRS	Performance Measurement and Reporting System
PRISM	Procurement Information System for Management
VSS	Visitor Services System
X	Office of the Chief Financial Officer
Z	Office of the Chief Acquisition Officer

Appendix C – Audit Sample

Sample No.	Sample Category	Exit Clearance Type	Date of Separation or Reassignment
1	Federal Employee	Separation	3/27/2021
2	Federal Employee	Reassignment	4/12/2020
3	Federal Employee	Reassignment	3/28/2021
4	Contractor	Separation	2/22/2021
5	Federal Employee	Reassignment	4/12/2020
6	Federal Employee	Separation	1/18/2020
7	Federal Employee	Reassignment	8/30/2020
8	Federal Employee	Separation	3/27/2020
9	Federal Employee	Separation	1/18/2020
10	Federal Employee	Reassignment	8/16/2020
11	Federal Employee	Separation	10/10/2020
12	Federal Employee	Separation	1/2/2021
13	Federal Employee	Reassignment	3/28/2021
14	Federal Employee	Reassignment	11/8/2020
15	Contractor	Separation	11/13/2020
16	Federal Employee	Separation	1/29/2021
17	Federal Employee	Separation	6/20/2020
18	Federal Employee	Reassignment	2/16/2020
19	Federal Employee	Reassignment	3/1/2020
20	Federal Employee	Reassignment	8/30/2020
21	Federal Employee	Separation	2/15/2020
22	Federal Employee	Separation	5/9/2020
23	Contractor	Separation	9/10/2020

Appendix D – Agency Comments

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

Appendix E – Report Distribution List

Archivist of the United States
Deputy Archivist of the United States
Executive Secretariat
General Counsel
Chief of Management and Administration
Acting Chief Operating Officer
Acting Chief Acquisitions Officer
Chief Human Capital Officer
Chief Financial Officer
Chief Information Officer
Executive for Business Support Services
Accountability
United States Senate Homeland Security and Governmental Affairs Committee
United States House of Representatives Committee on Oversight and Accountability

OIG Hotline

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 and letters to the Hotline post office box, we also accept emails through an online referral form. Walk-ins are always welcome. Visit www.naraoig.oversight.gov/ for more information, or contact us:

By telephone

Washington, DC, Metro area: 301- 837-3000

Toll-free: 800-786-2551

By mail

Office of Inspector General

National Archives and Records Administration

8601 Adelphi Road, Room 2800

College Park, MD 20740-6001

By facsimile

301-837-3197

By online referral form

www.naraoig.oversight.gov/online-complaint-form

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 Claims 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 www.naraoig.oversight.gov/oig-contractor-reporting-form.