



OFFICE *of*
INSPECTOR GENERAL
NATIONAL ARCHIVES

NARA's Compliance with Homeland Security
Presidential Directive 12

February 9, 2017

OIG Audit Report No. 17-AUD-07

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Executive Summary

NARA's Compliance with Homeland Security Presidential Directive 12

OIG Report No. 17-AUD-07

February 9, 2017

Why Did We Conduct This Audit?

Homeland Security Presidential Directive 12 (HSPD-12) *Policy for a Common Identification Standard for Federal Employees and Contractors*, issued in August 2004, directed the promulgation of a Federal standard for secure and reliable forms of identification for Federal employees and contractors. The standard would enhance security, increase Government efficiency, reduce identity fraud, and protect personal privacy. The Office of Management and Budget (OMB) issued Memorandum M-05-24, *Implementation of Homeland Security Presidential Directive (HSPD) 12 – Policy for a Common Identification Standard for Federal Employees and Contractors*, in August 2005, providing implementing instructions for HSPD-12 and Federal Information Processing Standard (FIPS) 201. This audit was initiated to determine whether NARA effectively complied with requirements for accessing NARA facilities and information systems.

What Did We Recommend?

We made four recommendations to improve NARA's efforts in implementing HSPD-12.

What Did We Find?

Although NARA already spent approximately \$2.8 million and utilized many resources over the past 12 years, NARA has not fully implemented all HSPD-12 requirements and missed critical deadlines. In addition, NARA has not developed an agency-wide cost estimate detailing all costs related to implementing HSPD-12, and continues to report unsupported implementation dates to OMB. Specifically, we found NARA did not (1) complete an implementation plan, (2) develop and issue an HSPD-12 implementation policy, (3) formally designate an agency lead official for ensuring issuance of the agency's HSPD-12 implementation policy, and (4) delegate an office to provide guidance and oversight. We attribute these conditions to NARA not making implementation of the directive a priority and not having effective management controls in place to adequately plan and execute requirements to ensure full and timely implementation of HSPD-12. Without adequate management controls and an agency-wide approach for documenting and monitoring expenses, there is an increased risk of redundant expenses, wasted resources, and HSPD-12 goals not being achieved; leaving NARA facilities, networks, and information systems at increased security risk. Also, without an implementation plan, NARA will not be able to establish a firm full implementation date that is reasonable and includes all remaining tasks that need to be accomplished.



James Springs
Inspector General

Background

Executive Memorandums

Homeland Security Presidential Directive 12 (HSPD-12) *Policy for a Common Identification Standard for Federal Employees and Contractors*, dated August 27, 2004, directed the promulgation of a Federal standard for secure and reliable forms of identification for Federal employees and contractors. It defined secure and reliable identification as identification that:

- is issued based on sound criteria for verifying an individual employee's identity;
- is strongly resistant to identity fraud, tampering, counterfeiting, and terrorist exploitation;
- can be rapidly authenticated electronically; and
- is issued only by providers whose reliability has been established by an official accreditation process.

The Office of Management and Budget (OMB) issued a Memorandum, *Implementation of Homeland Security Presidential Directive (HSPD) 12 – Policy for a Common Identification Standard for Federal Employees and Contractors* (M-05-24), providing implementing instructions for HSPD-12 and Federal Information Processing Standard (FIPS) 201. Federal agencies were to verify and/or complete background investigations for all current employees with 15 years or less service and contractors by October 27, 2007. All employees with more than 15 years of service were to have completed background checks and issued credentials by October 27, 2008. It indicated inconsistent agency approaches to facility security and computer security are inefficient and costly, and increase risks to the Federal government. Additionally, successful implementation of HSPD-12 and FIPS 201 would increase the security of Federal facilities and information systems. This standard identification applies to employees and contractors who work at an agency's facilities or have access to an agency's information systems.

FIPS 201 specifies the architecture and technical requirements for a common identification standard for Federal employees and contractors. The overall goal is to achieve appropriate security assurance for multiple applications by efficiently verifying the claimed identity of individuals seeking physical access to federally controlled government facilities and logical access to government information systems.

HSPD-12 requires the use of Personal Identity Verification (PIV) credentials for Physical Access Control Systems (PACS) and Logical Access Control Systems (LACS). FIPS 201 defines authentication mechanisms offering varying degrees of security for both logical and physical

access applications. Federal departments and agencies determine the level of security and authentication mechanisms appropriate for their applications. The PIV system is based on secure and reliable forms of identity credentials issued by the Federal government to its employees and contractors. These credentials are intended to authenticate individuals who require access to Federally controlled facilities, information systems, and applications. The data to be stored on PIV Cards includes personal information, certificates, cryptographic keys, the PIN (personal identification number), and biometric data.

OMB's Memorandum, *Continued Implementation of Homeland Security Presidential Directive (HSPD) 12 Policy for a Common Identification Standard for Federal Employees and Contractors* (M-11-11), required each agency to develop and issue an implementation policy by March 31, 2011, through which the agency would require the use of the PIV credentials as the common means of authentication for access to that agency's facilities, networks, and information systems. It also required the designation of an agency lead official for ensuring the issuance of the agency's HSPD-12 implementation policy.

Business Support Services and Information Services

The National Archives and Records Administration (NARA) had four offices implementing HSPD-12, Business Support Services - Security Management (BX) and Facility and Property Management (BFS) Divisions and Information Services - IT Security Management (IS) and Operations Management (IO) Divisions. BX manages the NARA-wide implementation of facility access in accordance with HSPD-12. BX also manages the intrusion detection, access control, closed-circuit television, and security communications systems in the National Archives Building and in the National Archives at College Park. BX issues and controls access credentials/keys for NARA employees, volunteers, visitors, and contractors at the National Archives Building and the National Archives at College Park. BFS contracts for architectural, engineering, and construction services for all construction, renovation, and restoration projects at NARA-owned facilities.

IS develops and manages an IT (information technology) Security Program that includes standards and guidelines for NARA IT systems issued in accordance with law and as directed by federal guidance.

NARA Directives

The Supplement to NARA 204, *Access Privilege Procedures at AI and AII*, describes specific procedures to be taken by BX security staff to issue facility access media to NARA employees, foundation staff, volunteers, agency reviewers, and contractors at AI.

NARA 275, *Background and Identity Verification Process for Access Privileges*, provides policies and procedures for establishing and implementing the personal identity verification and access control program at NARA.

Objectives, Scope, Methodology

The objective of this audit was to determine whether NARA effectively complied with HSPD-12 requirements for accessing NARA facilities and information systems. The audit was conducted at the National Archives Building (Archives I) and the National Archives in College Park, Maryland (Archives II).

To accomplish our objective, we interviewed representatives from Information Services – Security Management Division and Business Support Services – Security Management and Facility and Property Management Divisions. We also reviewed:

- Homeland Security Presidential Directive – 12: Policy for a Common Identification Standard for Federal Employees and Contractors;
- OMB Memorandum, Implementation of HSPD 12 – Policy for a Common Identification Standard for Federal Employees and Contractors (M-05-24);
- OMB Memorandum, Validating and Monitoring Agency Issuance of Personal Identity Verification Credentials (M-07-06);
- OMB Memorandum, HSPD – 12 Implementation Status (M-08-01);
- OMB Memorandum, Continued Implementation of HSPD 12– Policy for a Common Identification Standard for Federal Employees and Contractors (M-11-11);
- FIPS Publication 201– 2: Personal Identity Verification (PIV) of Federal Employees and Contractors;
- NARA 204, Access Privilege Procedures at AI and AII and its Supplement;
- NARA 275, Background and Identity Verification Process for Access Privileges; and
- Contract data and various internal and external reports.

This performance audit was conducted in accordance with generally accepted government auditing standards between January 2015 and July 2016.¹ The generally accepted government auditing standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit was conducted by Kimberly Boykin, Senior Program Auditor.

¹ The issuance of this audit was delayed due to other competing priorities within the OIG.

Audit Results

Finding 1. NARA Has Not Fully Implemented the HSPD-12 Requirements

Although NARA already spent approximately \$2.8 million and utilized many resources over the past 12 years, NARA has not fully implemented all of the HSPD-12 requirements and missed critical deadlines. In addition, NARA has not developed an agency-wide cost estimate detailing all costs related to implementing HSPD-12, and continues to report unsupported implementation dates to OMB. We attribute these conditions to NARA not making implementation of the directive a priority and not having effective management controls in place to adequately plan and execute requirements to ensure full and timely implementation of HSPD-12. Without adequate management controls and an agency-wide approach for documenting and monitoring expenses, there is an increased risk of redundant expenses, wasted resources, and HSPD-12 goals not being achieved; leaving NARA facilities and information systems at increased security risk.

HSPD-12, issued in August 2004, directed the promulgation of a Federal standard for secure and reliable forms of identification for Federal employees and contractors. OMB M-05-24 provided implementing instructions for the HSPD-12 Directive and the FIPS 201.

Critical Deadlines Missed

OMB issued several guidance memorandums to agencies after the release of HSPD-12 including the following (see Table 1 for HSPD-12 requirements and mandated completion dates):

- OMB Memorandum M-05-24, *Implementation of Homeland Security Presidential Directive (HSPD) 12 – Policy for a Common Identification Standard for Federal Employees and Contractors*, required agencies to complete an implementation plan by June 2005.
- OMB’s 2008 Memorandum, *Guidance for Homeland Security Presidential Directive (HSPD) 12 Implementation*, provided a guideline the agency should have considered when planning for the use of PIV credentials with physical and logical access control systems.
- OMB Memorandum M-11-11, *Continued Implementation of Homeland Security Presidential Directive (HSPD) 12 - Policy for a Common Identification Standard for Federal Employees and Contractors*, indicated agencies were in a position to step up their efforts to use the electronic capabilities of PIV credentials as the common means of authentication for access to agency information systems.

Despite OMB’s guidance for agencies to prioritize implementation and requirements for key deliverables, NARA did not make implementation of HSPD-12 a priority and missed critical deadlines. NARA did not (1) complete an implementation plan, (2) develop and issue an HSPD-12 implementation policy, and (3) formally designate an agency lead official for ensuring issuance of the agency’s HSPD-12 implementation policy.

Table 1: HSPD-12 Requirements and Mandated Completion Dates

Guidance	Action	Required Completion Date	NARA Adherence Yes/No
OMB Memorandum M-05-24	Complete implementation plan	June 27, 2005	No ²
	Verify and/or complete background checks and issue credentials for all employees with 15 years or less service and contractors	October 27, 2007	No
	Complete background checks and issue credentials for all employees with more than 15 years of service	October 27, 2008	No ³
OMB Memorandum M-11-11	Designate an agency lead official for ensuring the issuance of the agency’s HSPD-12 implementation policy	February 25, 2011	No
	Develop and issue an HSPD-12 implementation policy	March 31, 2011	No

Since issuance of HSPD-12 there have been several NARA executives in key areas related to HSPD-12, including security, facilities and information services. NARA was unable to provide documentation supporting actions based on OMB guidance.

NARA could not provide the original implementation plan. However, they did provide the completed *HSPD-12 Reporting Template for November 2008 Implementation Plan Update*, which indicated NARA would be fully compliant with HSPD-12 by April 30, 2009. This updated plan was a questionnaire and did not provide detailed information regarding NARA’s plan to implement HSPD-12. We also obtained an Implementation Plan, dated June 21, 2013, prepared by a contracted private company for LACS. Along with the absence of the implementation plan that would have guided NARA’s implementation efforts; there were also no comprehensive agency-wide internal documents, including project or program plans outlining

² Although the OIG repeatedly requested the implementation plan and discussed this finding in multiple meetings, NARA did not provide the documentation until after the Discussion Draft report was issued by the OIG.

³ NARA completed the background checks, but not all employees with more than 15 years of service were issued credentials.

the scope of work, critical tasks or requirements, roles and responsibilities of key personnel, milestones for critical tasks, costs, locations, or any other necessary documentation that would allow the agency to successfully implement HSPD-12 and meet deadlines established by OMB.

There was also no documentation to support designation of an agency lead official for ensuring the issuance of the agency's HSPD-12 implementation policy; or designation of an official to lead and oversee the agency through the implementation process. There appeared to be confusion as to which office was leading implementation of HSPD-12. Current Information Services management indicated the Chief Information Security Officer (CISO) was the lead official, but our review showed the CISO was only overseeing the implementation of LACS. In addition, management did not use a Program or Project Management Function to support implementation including managing requirements and resources. Instead Business Support Services and Information Services, two of the main organizations involved in implementing HSPD-12, originally operated in silos and not as cohesive as needed to implement a directive of this magnitude.

Reporting to OMB

NARA did not establish a full implementation date for HSPD-12 and continues to report unsupported implementation dates to OMB. OMB requested agencies periodically report on their HSPD-12 status. Based on documentation provided, NARA was seven years behind the original implementation date (April 30, 2009) reported to OMB in November 2008. The dates NARA periodically reports to OMB are not based on full implementation plans. OMB's website reported in quarter one of FY 2014 that NARA's planned date of full HSPD-12 implementation was December 2015. Further, in December 2014 NARA's website also indicated complete integration of PIV credentials with physical access systems would be completed in December 2015. However, that data was updated in December 2015 to reflect December 2016.⁴ Based on

⁴ In June 2016, NARA's website reflected the following for the Implementation Plan Summary: "Completed initially planned issuance of PIV credentials, to include during on-boarding, to all employees and contractors requiring PIV credentials March 2010, prior to logical access systems implementation (LACS). In 2014, NARA completed a pilot project which provided PIV enabled multi-factor authentication for a limited number of users. In 2015, NARA began deploying LACS PIV card readers throughout the agency and completed the deployment early March 2016. Changed process to issue a PIV card to all individuals requiring access to NARA IT resources. December 2016 is the estimated date that NARA will have 100% capability for two factor authentication to the Network. Planned PIV card issuance to all others without LACS access is December 2017. By December 2016 approximately 90% of all agency PACS card readers will be FIPS 201 compliant. Agency plan is to continue replacement of PACS to meet FIPS 201 compliance on a phased implementation based on normal equipment replacement life cycle. Expect all PACS to be FIPS 201 compliant by 2020. The new effort for centralized agency-wide integration of PACS with Identity Management System is planned to begin 2016 with expected completion to be determined once technical expertise is acquired and agency-wide PACS fully assessed."

discussions with management, all of those dates were incorrect. The dates reported have not been reliable.

Costs

OMB Memorandum M-11-11, mandated implementation policies to include the requirement that effective the beginning of FY 2012, existing physical and logical access control systems were to be upgraded to use PIV credentials, in accordance with NIST guidelines, prior to the agency using development and technology refresh funds to complete other activities.

NARA did not properly plan and develop an agency-wide cost estimate detailing all costs related to implementing HSPD-12. Instead of fully implementing HSPD-12, NARA spent several years and funds slowly implementing the Directive. During the audit we requested documentation to support funds budgeted and expended. BX and Information Services provided some documentation to support past expenses, however estimates were provided for some future expenses that have yet to be requested and approved through the budgeting process. Additionally, the Chief Information Officer (CIO) indicated due to budget constraints, Information Services has been unable to embrace this project as aggressively as desired. Business Support Services management also indicated budget constraints prevented the organization from upgrading all of NARA facilities as required by the Directive.

Since NARA is still identifying future expenses, the agency will remain non-compliant until all expenses are identified, budgeted, and approved. Without an agency-wide approach for documenting and monitoring past and future expenses, there is the risk of redundant expenses and wasted resources.

Actions Taken to Implement HSPD-12

While efforts are currently underway to comply with the HSPD-12 requirements, a significant amount of work remains for NARA to be fully compliant.

Physical Access Controls Implementation and PIV Issuance

HSPD-12 requires the use of PIV cards to gain access to federal facilities. We found management did not document the implementation plan for implementing physical access controls. While BX maintained a spreadsheet of the status of PACS at the NARA facilities, there was no implementation plan to support the scope and schedule for each facility. As funding became available for facilities, the spreadsheet was updated.

NARA spent an estimated \$2,101,432 since FY 2005 on implementing physical access controls, however not all of NARA's facilities were HSPD-12 compliant. Funds spent from FY 2005

through FY 2014 were used to install and upgrade access systems, procure credentialing equipment, badge issuance, and monthly credential maintenance fees. NARA estimates future expenses will be approximately \$4,538,385. See Table 2.

Table 2: Physical Security Expenses and Future Costs

Type Expense	Estimated Expense Incurred FY05 - FY14	Estimated Future Expenses FY15 - FY20	Total Incurred and Future Expenses FY05 - FY20
PIV Card Services ⁵	\$1,180,660	\$1,667,645	\$2,848,305
PIV Card Support Equipment	\$52,072	\$80,740	\$132,812
Physical Access Control Systems (PACS)	\$868,700	\$2,790,000	\$3,658,700
Total	\$2,101,432	\$4,538,385	\$6,639,817

Although HSPD-12 required PIV badges to be issued to all employees and contractors, the agency originally only issued PIV cards to contractors that needed access to network systems. BX indicated this decision was based on cost savings. In FY 2015, BX started issuing PIV cards to all contractors in conjunction with the agency's on-going LACS implementation. NARA reallocated funds at the end of FY 2015 to deploy 35 additional light credentialing stations at the remaining facilities without stations to allow quicker access to issue and update PIV badges.

Currently, NARA occupies forty-four facilities across the United States. The status of the PACS as of April 2016 were (see Appendices A and B for a detailed list):

- 20 facilities PACS have been upgraded or installed;
- 10 facilities PACS have not been upgraded;
- 11 facilities will not be upgraded to comply with HSPD-12 as they do not have access control systems (card readers);
- 3 facilities had been allocated funding and PACS are under construction.

Of the 10 facilities with non-compliant PACS, five of the facilities were NARA owned and the remaining five were GSA owned. Implementation dates have not been established for these facilities. Originally, NARA had not communicated with GSA. However, in March 2016, management indicated the upgrades will occur based on normal life cycle requirements and there will be a data call to understand the age, current technology, and size of the PACS systems in the leased facilities.

BX indicated funding was a constraint to completing the PACS upgrades, which were estimated to cost \$3.2 million for NARA owned facilities. The funds for leased facilities had not been

⁵ Interagency Agreement with General Services Administration.

determined by BX. BX indicated there would be a data call to understand the age, current technology, and size of the PACS in leased and owned facilities.

Logical Access Control Systems

HSPD-12 requires the use of PIV cards to access federal systems. NARA issued HSPD-12-compliant PIV cards and card readers to NARA employees, but the cards were not required for access to NARA systems. In April 2015, the CIO indicated Information Services was in the preliminary stages of the project and were working towards establishing the required artifacts.

During their 2013 OMB PortfolioStat accountability session,⁶ NARA reported meeting 0% of HSPD-12 strong authentication requirements. OMB indicated agencies were required to implement 75% of strong authentication requirements by end of FY 2014. Additionally, OMB indicated NARA should prioritize implementation of HSPD-12 compliant PIV card logical/network access to improve overall cyber security posture and support strong authentication. In 2014, NARA reported 0% of NARA employees and contractors were required to use HSPD-12 smartcards for network log-on, although NARA has now identified funding to implement the HSPD-12 Cross-Agency Priority (CAP) goal. OMB indicated (1) NARA should continue to report its progress in achieving HSPD-12 compliance via CyberScope and (2) it will assist NARA in scheduling a meeting with the GSA MSO to determine how GSA can better support NARA's HSPD-12 implementation.

In June 2015, OMB launched a *30-day Cybersecurity Sprint* to assess and improve the health of all Federal assets and networks, both civilian and military. As part of the Sprint, OMB directed agencies to further protect Federal information, improve the resilience of our networks, and report on their successes and challenges. Agencies were instructed to immediately patch critical vulnerabilities, review and tightly limit the number of privileged users with access to authorized systems, and dramatically accelerate the use of strong authentication, especially for privileged users. NARA reported for the *Cybersecurity Sprint* five tasks for PIV authentication for privileged and unprivileged users at the network level. The five tasks identified by NARA were to:

- assign a dedicated IT project manager to NARA's LAC project, of which the implementation of 2-factor authentication using PIV cards is a component;
- expedite PIV sponsorship of those privileged users who do not currently have PIV cards;
- complete getting the necessary card readers and middleware installed on client workstations of privileged users;

⁶ OMB engaging directly with agency leadership to assess the effectiveness of current IT management practices and address opportunities to improve management of IT resources.

- complete the issuance of PIV cards to privileged users and configure their network accounts for PIV authentication; and
- continue to issue PIV cards to unprivileged users and configure them for PIV card authentication to the agency's network.

In January 2016, OMB sent NARA a memorandum of the action items identified as a result of the agency's *CyberStat Review*. Action items were identified to improve NARA's cybersecurity posture, including NARA's challenges in implementing PIV and the need to develop a PIV implementation plan and connect NARA with agencies that have solved these challenges. NARA was required to submit a PIV implementation plan, including a breakout of privileged and unprivileged users and Federal and contract employees, milestones and timelines for meeting the Cybersecurity Cross-Agency Priority (CAP) goal, as well as documenting existing challenges. NARA was also required to submit updated policies and procedures for access control and authentication and note any challenges to limiting the reuse of system administrator passwords, combatting the use of weak credentials, and ensuring inactive user accounts are disabled in a timely manner. Not all of the actions have been completed, including the PIV implementation plan which is contingent upon execution of a new contract.

NARA's implementation of LACS includes many components, including:

- NARA Identity Management and Access Management Services (IDMS);
- Human Resources data from the Interior Business Center (IBC);
- US Access General Services Administration Managed Service Office (GSA/MSO) for PIV card issuance;
- NARA Workstation and Device Configuration;
- PIV Credentialing Processes for all NARA personnel;
- Security Information and Event Management (SIEM) for PIV compliance tracking; and
- Other enterprise activities related to HSPD-12 compliance.

In 2013, NARA contracted with a private company and launched a mini-pilot of LACS. However, significant work did not begin until September 2014 when a firm-fixed price contract⁷ was executed with the company for the implementation of a Federal Identity, Credential, and Access Management (FICAM) and HSPD-12 compliant LACS system for \$502,733 and 2,200 hours. According to contract documentation, the vendor was to complete all tasks required to implement a functional LACS in three phases. The goals of the three phases were to:

⁷ The contract was extended in FY15 to March 2016 at no cost to NARA.

- expand the HSPD-12 pilot and begin the process of automating the PIV life cycle. This included development of the process to automated workstation PIV enablement, defining the process for enrolling users (PIV enablement), upgrade the existing IDMS infrastructure and to perform the requirements analysis for IDMS integration with IBC and US Access.
- implement the IDMS enhancements that enable automation of PIV life cycle for employees and contractors. This included the deployment of IDMS drivers to support the automation to include IBC, US Access SIP interface and Employee Locator.
- implement monitoring and reporting for compliance tracking, begin the process of integrating with NARA physical access and continue the rollout of PIV enablement to NARA users.

The system would allow NARA employees, contractors and authorized external users with registered PIV badges to use their PIV badge and PIN to access NARA workstations, network and application resources. As a part of implementing LACS, several vital systems for user credentials were integrated into the NARA IDMS in FY 2015 (See Appendix C for Integration Diagram). Thus far, NARA has spent \$716,626 on implementation of LACS.

IS provided a high-level overview of tasks that must be completed to fully implement LACS. Although many dates have been documented and communicated, NARA continues to estimate when LACS will be fully implemented. For example, in August 2015, NARA provided information to NARA employees about the use of PIV cards. The original guidance indicated the PIV rollout will begin in Archives II, then Archives I, and eventually it would be extended enterprise wide. Updated guidance stated (1) all employees would be required to use smart card authentication with their PIV card for access to federal information system and (2) the date for required use of the PIV card to access NARA workstations has not been finalized; however, would likely be January 1, 2017.

Recommendations

We recommend the following to help improve NARA's efforts in implementing HSPD-12.

Recommendation 1: Chief of Management and Administration appoints an Executive to lead and oversee the implementation of HSPD-1.

Management Response

The Chief of Management and Administration will appoint an Executive to lead and oversee the implementation for HSPD-12.

Target Completion Date: March 1, 2017

OIG Analysis

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

Recommendation 2: Chief of Management and Administration or designee develops a detailed implementation plan with remaining work to be completed, critical tasks, roles and responsibilities of key personnel, milestones for critical tasks, costs, locations, and any other necessary documentation that would allow the agency to successfully implement HSPD-12.

Management Response

The Chief of Management and Administration will give the Executive lead 180 days to develop a detailed implementation plan with remaining work to successfully implement HSPD-12.

Target Completion Date: December 29, 2017

OIG Analysis

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

Recommendation 3: Chief of Management and Administration or designee uses existing budgetary resources to fully implement HSPD-12.

Management Response

With the Executive, the Chief of Management and Administration will establish a reasonable funding plan to fully implement HSPD-12, and it will be reflected in the implementation plan from Recommendation 2.

Target Completion Date: December 29, 2017

OIG Analysis

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

Recommendation 4: Chief of Management and Administration or designee establishes a reasonable date to fully implement HSPD-12.

Management Response

The Chief of Management and Administration will establish a reasonable date to fully implement HSPD-12, and it will be reflected in the implementation plan from Recommendation 2.

Target Completion Date: December 29, 2017

OIG Analysis

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

Appendix A – Status of PACS at NARA Owned Facilities

Facility	# of Readers	HSPD-12 Compliant	PIV
Archival Operations - Fort Worth (Fort Worth Records Center Annex)	0	N/A	
Archival Operations - Fort Worth (Montgomery Plaza)	0	N/A	
Lee's Summit Federal Records Center	0	N/A	
Chicago Palletized	0	N/A	
Dayton Palletized	0	N/A	
Dwight D. Eisenhower Library	0	N/A	
Archival Operations - Atlanta	10	No	
Lenexa Federal Records Center	50	No	
Gerald R. Ford Museum (1)	14	No	
Herbert Hoover Library	1	No	
Jimmy Carter Library	10	No	
Lyndon B. Johnson Library	54	No	
Ronald Reagan Library (1)	12	No	
Atlanta Federal Records Center	29	Yes	Yes
Fort Worth Federal Records Center	25	Yes	Yes
Riverside Federal Records Center	21	Yes	Yes
Franklin D. Roosevelt Library	29	Yes	Yes
George Bush Library	52	Yes	Yes
George W. Bush Library	136	Yes	Yes
Gerald R. Ford Library	4	Yes	Yes
John F. Kennedy Library	56	Yes	Yes
Richard Nixon Library	10	Yes	Yes
Harry S. Truman Library	10	Yes	Yes
William J. Clinton Library	84	Yes	Yes
National Archives in College Park (1)	401	Yes	No
National Archives in Washington DC	487	Yes	Yes
National Personnel Records Center - Valmeyer Annex	50	Yes	Yes
Rocket Center	39	Yes	Yes

(1) Projects funded and under construction.

Appendix B – Status of PACS at GSA Owned Facilities

Facility	# of Readers	HSPD-12 Compliant	PIV
Pittsfield Federal Records Center	0	N/A	
Archival Operations - San Francisco	0	N/A	
Boston Federal Records Center	0	N/A	
Federal Register	0	N/A	
Laguna Niguel	0	N/A	
Chicago Federal Records Center	16	No	
Dayton Federal Records Center	15	No	
Kingsridge Federal Records Center	11	No	
Philadelphia Federal Records Center	21	No	
Seattle Federal Records Center	2	No	
Archival Operations - Kansas City	14	Yes	Yes
Archival Operations - New York	10	Yes	Yes
Denver Federal Records Center	24	Yes	Yes
Kansas City Federal Records Center	24	Yes	Yes
National Personnel Records Center – St. Louis	110	Yes	Yes
Washington National Records Center	60	Yes	Yes

Appendix C – NARA IDMS Current State

The information in this Appendix has been removed because it contains information about the IT environment which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.

Appendix D – Acronyms

BX	Business Support Services - Security Management Division
CAP	Cybersecurity Cross-Agency Priority
CIO	Chief Information Officer
CISO	Chief Information Security Officer
FIPS	Federal Information Processing Standard
GSA	General Services Administration Managed Service Office
HSPD-12	Homeland Security Presidential Directive 12
IBC	Interior Business Center
IDMS	Identity Management and Access Management Services
IO	Operations Management Division
IS	Information Services Security Management Division
IT	information technology
LACS	Logical Access Control System
NARA	National Archives and Records Administration
NIST	National Institute of Standards and Technology
OIG	Office of Inspector General
OMB	Office of Management and Budget
PACS	Physical Access Control System
PBS	Public Building Service
PIN	personal identification number
PIV	Personal Identity Verification
SIEM	Security Information and Event Management

Appendix E – Management Response



Date: FEB 01 2017
To: James Springs, Inspector General
From: David S. Ferriero, Archivist of the United States
Subject: Management's Response to OIG Report 17-AUD-07, *NARA's Compliance with Homeland Security Presidential Directive 12 (HSPD-12)*

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

I would like to recognize my staff for the considerable work they have completed to date towards HSPD-12 compliance. I agree your recommendations will be helpful for NARA to become fully compliant. This effort is significantly dependent on new resources and will take several years to complete. Our implementation plan will include a reasonable funding plan and full implementation date.

We concur with the four recommendations in this audit, and in response, the attachment provides a summary of our proposed actions. As each recommendation is satisfied, we will provide documentation to your office. If you have questions about this action plan, please contact Kimm Richards at kimm.richards@nara.gov or by phone at 301-837-1668.



DAVID S. FERRIERO
Archivist of the United States
Attachment

NATIONAL ARCHIVES *and*
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**Action Plan Response to OIG Report:
17-AUD-07, NARA's Compliance with Homeland Security Presidential Directive 12**

Recommendation 1: We recommend the Chief of Management and Administration appoints an Executive to lead and oversee the implementation of HSPD-12.

Planned Action: The Chief of Management and Administration will appoint an Executive to lead and oversee the implementation for HSPD-12.

Target Completion Date: March 1, 2017

Recommendation 2: We recommend the Chief of Management and Administration or designee develops a detailed implementation plan with remaining work to be completed, critical tasks, roles and responsibilities of key personnel, milestones for critical tasks, costs, locations, and any other necessary documentation that would allow the agency to successfully implement HSPD-12.

Planned Action: The Chief of Management and Administration will give the Executive lead 180 days to develop a detailed implementation plan with remaining work to successfully implement HSPD-12.

Target Completion Date: December 29, 2017

Recommendation 3: We recommend the Chief of Management and Administration or designee uses existing budgetary resources to fully implement HSPD-12.

Planned Action: With the Executive, the Chief of Management and Administration will establish a reasonable funding plan to fully implement HSPD-12, and it will be reflected in the implementation plan from Recommendation 2.

Target Completion Date: December 29, 2017

Recommendation 4: We recommend the Chief of Management and Administration or designee establishes a reasonable date to fully implement HSPD-12.

Planned Action: The Chief of Management and Administration will establish a reasonable date to fully implement HSPD-12, and it will be reflected in the implementation plan from Recommendation 2.

Target Completion Date: December 29, 2017

Appendix F – Report Distribution List

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