



September 30, 2020

TO: David S. Ferriero  
Archivist of the United States

FROM: James Springs *James Springs*  
Inspector General

SUBJECT: *Compendium of Open OIG Recommendations to the National Archives & Records Administration*  
OIG Report No. 20-R-17

The National Archives and Records Administration (NARA) Office of Inspector General (OIG) is charged with detecting and preventing fraud, waste, mismanagement, and abuse of agency programs and operations. The OIG makes recommendations designed to promote economy, efficiency, and effectiveness of NARA. The purpose of this Special Report is to summarize NARA OIG's recommendations that remain open as of September 30, 2020. An open recommendation is a recommendation previously documented in a report for which agreed upon corrective actions have not been implemented by NARA.

#### Tracking OIG Recommendations

The Office of Management and Budget Circular A-50 Revised, *Audit Followup*, indicates Audit followup is an integral part of good management, and is a shared responsibility of agency management officials and auditors. Requirements include: (1) agencies shall assign a high priority to the resolution of audit recommendations and corrective actions and (2) resolution shall be made within a maximum of six months after issuance of a final report. Timely resolution and closure of open recommendations is imperative as NARA's future annual budget justifications to Congress, must include (1) a report listing each recommendation for corrective action from the OIG and (2) a report on the implementation status of each recommendation in accordance with the 2019 Good Accounting Obligation in Government Act.

NARA Management and the OIG share the responsibility to followup on recommendations. NARA Management is responsible for implementing recommendations promptly. The OIG is responsible for assessing NARA's implementation of corrective action and determining whether the action taken met the intent of the recommendation. NARA and the OIG have worked cooperatively to ensure our recommendations, and their corrective actions meet the intent of the recommendations.

## Status of Open Recommendations

The abundance of open recommendations continues to demonstrate weaknesses in NARA's internal control system. In FY 2020 NARA closed 79 recommendations, ending the year with 268 open recommendations of which 38 were between three and eight years old. While NARA offices continue to show commitment to closing open audit recommendations and work cooperatively with the OIG in doing so, we remain especially concerned with (1) the lack of attention to implementation dates set by offices for open recommendations and (2) some offices' lack of understanding of what is required to close recommendations based on audit report findings, agreed upon recommendations, and action plans submitted by those offices.

As previously mentioned, NARA has 38 recommendations that are between three and eight years old. In FY 2021 the OIG will be contacting offices to obtain an understanding of progress made, assess the root cause of delayed implementation of corrective actions, and obtain supporting documentation in order to facilitate closure of those longstanding open recommendations.

The attachment provides a summary of our review of the open recommendations (Figures 1 through 6), including a detailed listing of all open recommendations (see pages 9-52). The OIG continues to report quarterly to NARA Management on the agency's progress in closing recommendations. Also, in FY 2020 the OIG started populating [oversight.gov](https://www.oversight.gov) with NARA's open recommendations.

The OIG will continue to meet its responsibilities as required for audit followup and looks forward to working with NARA Management in their efforts to implement corrective actions that will help reduce the number of open recommendations.

As with all OIG products, we determine what information is publically posted on our website from the attached report. Consistent with our responsibility under the *Inspector General Act, as amended*, we may provide copies of our report to congressional committees with oversight responsibility over the National Archives and Records Administration.

Attachment

cc: Debra Wall, Deputy Archivist of the United States  
William Bosanko, Chief Operating Officer  
Chris Naylor, Deputy Chief Operating Officer  
Micah Cheatham, Chief of Management and Administration  
Valorie Findlater, Acting Chief Human Capital Officer  
Swarnali Haldar, Chief Information Officer  
Colleen Murphy, Chief Financial Officer  
Pamela Wright, Chief Innovation Officer  
Gary Stern, General Counsel  
Oliver Potts, Director of Federal Register  
Jay Trainer, Executive for Agency Services  
Ann Cummings, Executive for Research Services  
Susan Donius, Executive for Legislative Archives, Presidential Libraries, and  
Museum Services  
Donna Forbes, Executive for Business Support Services  
Kimm Richards, Accountability  
United States House Committee on Oversight and Government Reform  
Senate Homeland Security and Governmental Affairs Committee

## Summary of Open Recommendations

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This report identifies 268 open recommendations from OIG reports as of September 30, 2020. The majority of open recommendations are within Information Services (see Figure 3 and 4). It also includes three recommendations that remain unresolved because NARA has not agreed to implement the recommendations or provided proposed actions to resolve the deficiencies identified in audit reports.

*Figures 1 and 2. Number of Recommendations Reported in Compendiums*

	<b>FY 2018</b>	<b>FY 2019</b>	<b>FY 2020</b>
<b>Beginning Open Recommendations</b>	335	346	293
<b>+ New Recommendations</b>	71	61	54
<b>- Closed Recommendations</b>	<u>(60)</u>	<u>(114)</u>	<u>(79)</u>
<b>Ending Open Recommendations</b>	<b>346</b>	<b>293</b>	<b>268</b>

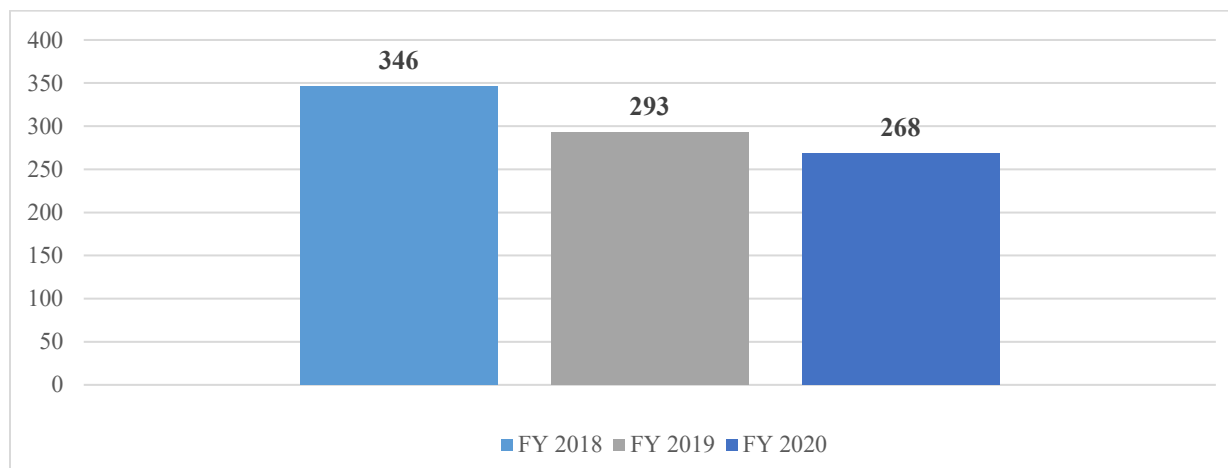


Figure 3. Status of Recommendations by Office

Office <sup>1</sup>	As of 10/1/2019	New Recs	Closed Recs	Transferred Recs	As of 9/30/2020
General Counsel	2	0	(1)	0	1
Federal Register	2	0	0	0	2
Human Capital	3	2	(2)	0	3
Innovation	6	0	(2)	0	4
Chief of Management & Administration (CMA)	4	4	0	0	8
Chief Operating Officer (COO)	9	4	(1)	(1)	11
Agency Services	16	0	(4)	0	12
Business Support Services	10	15	(11)	0	14
Research Services	23	0	(4)	0	19
Chief Acquisition Officer (CAO)	23	5	(3)	0	25
Legislative Archives, Presidential Libraries, and Museum Services (LPM)	28	0	(2)	0	26
Chief Financial Officer (CFO)	28	6	(4)	0	30
Information Services	149	20	(45)	1	125

<sup>1</sup> Recommendations are shared by multiple offices, but the OIG counted them separately in the chart above (CAO and CFO – 1; CMA and COO – 1; Business Support Services and Human Capital – 1; and LPM and Research Services – 9)

Figure 4. Number of Open Recommendations by Office as of September 30, 2019 compared to September 30, 2020

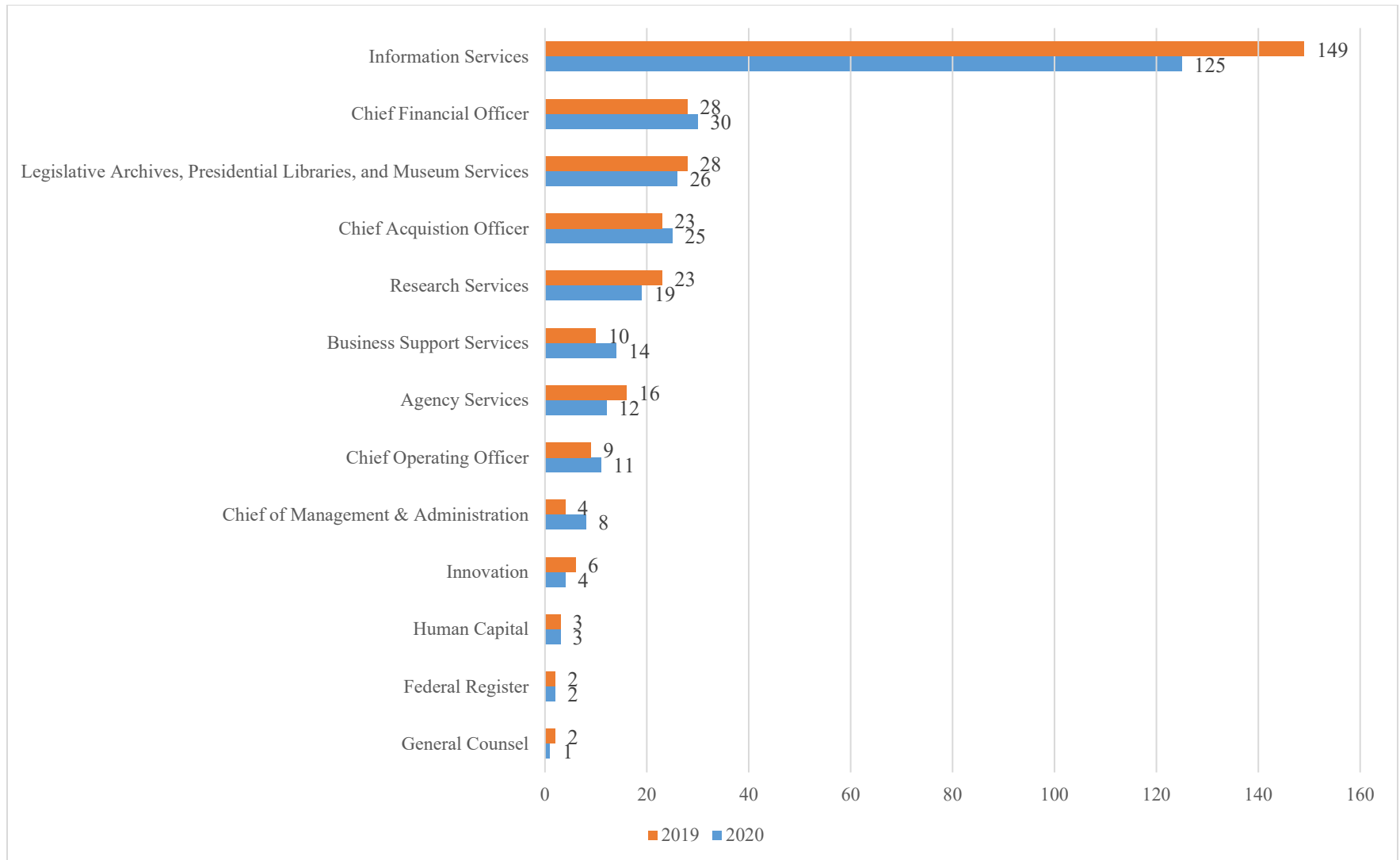


Figure 5. Number of Open Recommendations Open and Closed by NARA OIG between October 1, 2019 and September 30, 2020

Total Open Recommendations as of October 1, 2019	293
+ New Recommendations from Reports Issued between October 1, 2019 and September 30, 2020	54
- Recommendations Closed between October 1, 2019 and September 30, 2020	<u>(79)</u>
Total Open Recommendations as of September 30, 2020	268

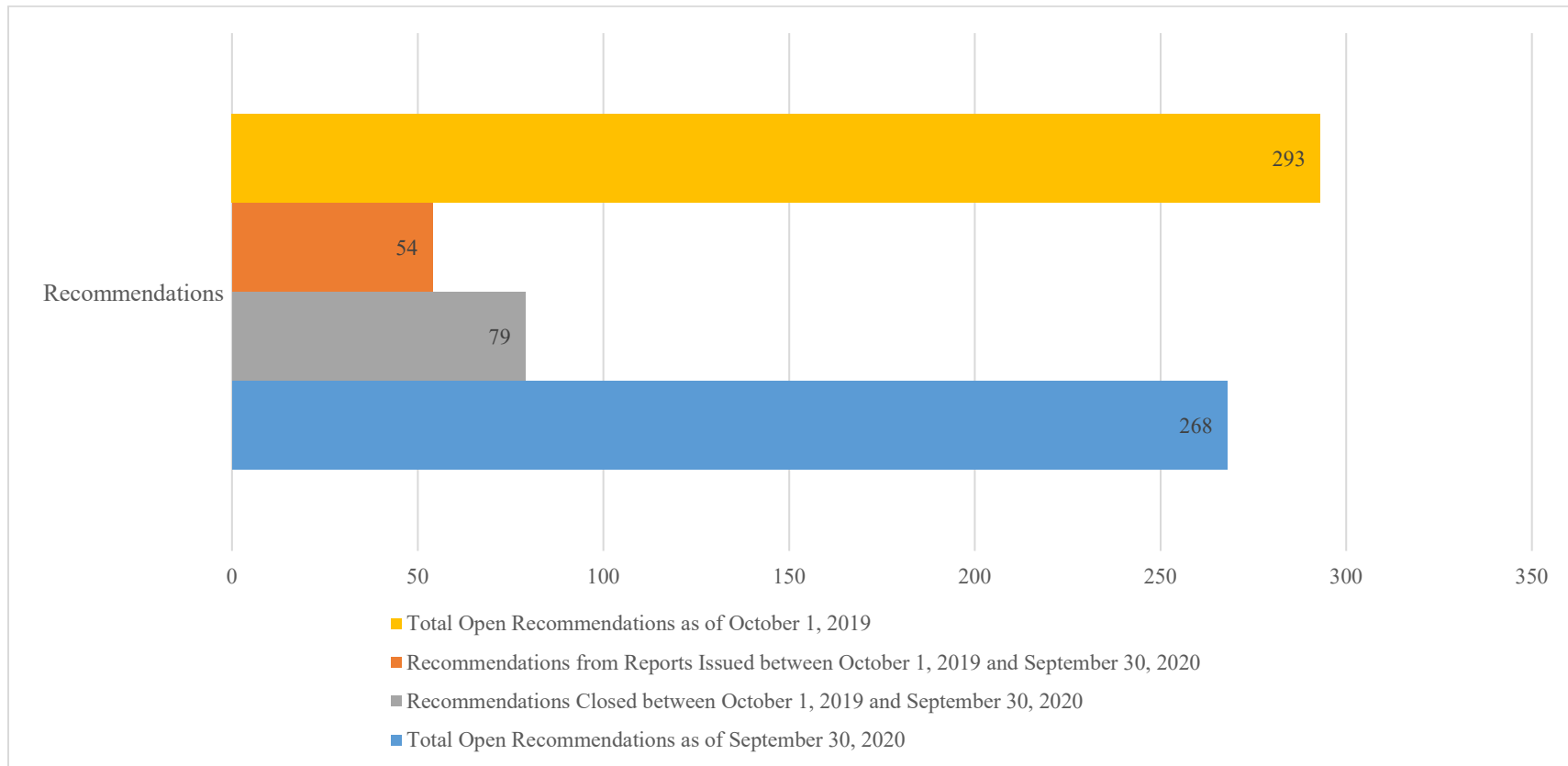
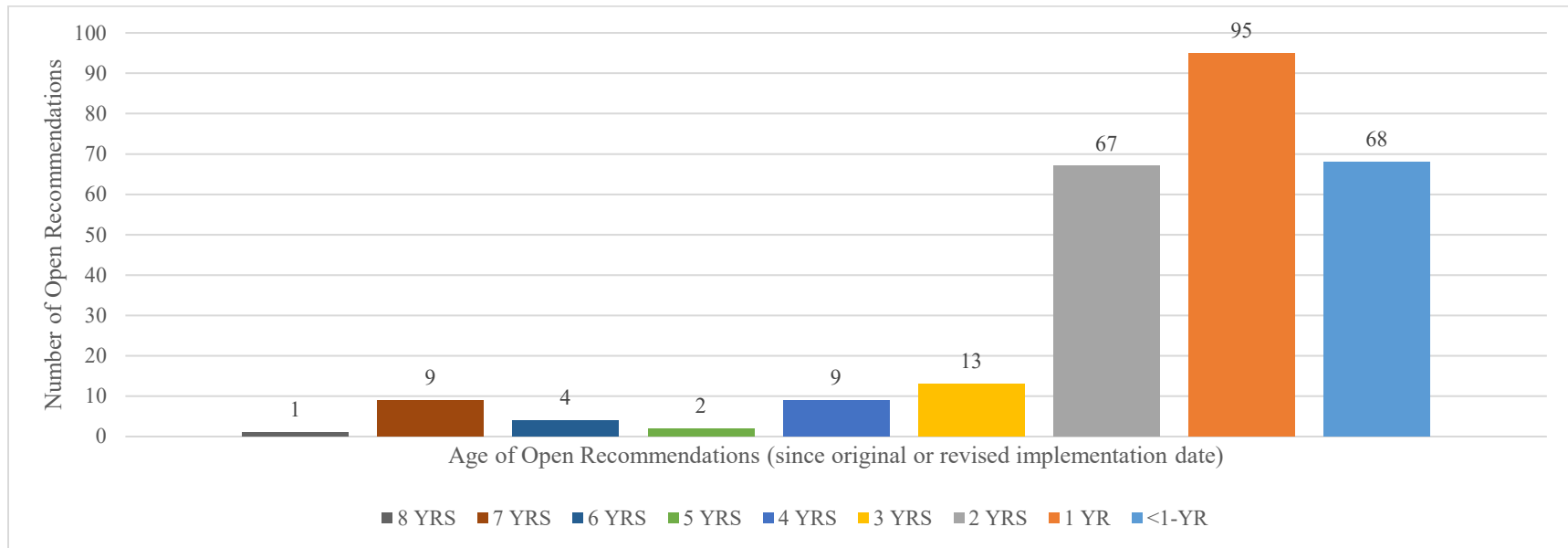


Figure 6. Age of Open Recommendations as of September 30, 2020

Years Open	Number of Recommendations
8 YRS	1
7 YRS	9
6 YRS	4
5 YRS	2
4 YRS	9
3 YRS	13
2 YRS	67
1 YR	95
<1-YR	68





## Open Recommendations as of September 30, 2020

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
Audit of NARA's Work at Home System (09-15), September 29, 2009					
7	The CIO ensures that the WAHS meets OMB and NIST requirements prior to full implementation.	Information Services	6/1/2010	9/30/2019	366
Audit of NARA's Oversight of Electronic Records Management in the Federal Government (10-04), April 2, 2010					
5	The Assistant Archivist for Records Services, Washington DC (NW) should ensure development of controls to adequately monitor agency scheduling of electronic records in an effort to reasonably ensure electronic records/systems are scheduled in timely manner, and therefore provide a reasonably accurate reflection of the universe of electronic records.	Agency Services	12/31/2016	9/30/2019	366
Network and Penetration Testing Oversight (11-02), November 8, 2010					
2b	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	2/28/2011	12/31/2018	639
3c	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	3/21/2011	11/30/2018	670
Audit of NARA's Data Center Consolidation Initiative (12-09), May 10, 2012					

<sup>2</sup>Calculated based on the latest of either the original implementation or revised implementation date (if applicable).

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
1b	The CIO should update the Master System List and/or Enterprise Architecture to incorporate energy usage calculations.	Information Services	8/31/2012	12/31/2018	639
1c	The CIO should update the Master System List and/or the Enterprise Architecture to incorporate realistic estimates of funding needed or savings to be realized from implementing NARA's data center consolidation goals.	Information Services	11/30/2012	12/31/2018	639
1d	The CIO should update the Master System List and/or the Enterprise Architecture to incorporate annual savings metrics such as rack count reduction, server count reduction, energy usage reduction, and energy cost reduction to monitor progress.	Information Services	11/30/2012	12/31/2018	639
3	The CIO should conduct the consolidation/virtualization analysis to investigate the impact of consolidating or virtualizing two major application domains (NISP and ERA) and the General Support System (NARANET) as planned, or evaluate other alternatives to increase the average server utilization rate.	Information Services	11/30/2012	12/31/2018	639
4	The Executive for Business Support Services should evaluate the current organization of rack space and determine whether servers can be consolidated into fewer racks when considering space optimization, power consumption, operations management, and component failure/recovery perspectives.	Information Services	11/30/2012	12/31/2018	639
Follow-up on OIG Audit Report 08-01: Audit of the Process of Safeguarding and Accounting for Presidential Library Artifacts (12-10), September 13, 2012					
2b	Review and revise current time-guidance policy, as appropriate, for baseline inventories for newly established Presidential libraries.	LPM	12/31/2013	9/30/2018	731

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
7a	Policies and procedures are clarified and reiterated to library personnel concerning 1) sequestration of museum artifacts from library personnel other than museum personnel, and 2) procedures to periodically review access logs and security camera tapes.	LPM	12/31/2013	9/30/2018	731
8a	Update comprehensive set of museum collection management policies and procedures and ensure their development.	LPM	12/31/2014	12/31/2018	639
8b	Establish procedures to periodically review and, if necessary, revise said policies and procedures.	LPM	12/31/2014	6/30/2019	458
NARANet Network Assessment Oversight (12-11), August 27, 2012					
14	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	2/28/2014	9/30/2019	366
20	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	11/30/2013	No Change	2496
48	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.  <i>Unresolved - The agency did not agree to implement the recommendation.</i>	Information Services	Unresolved	N/A	N/A
Audit of NARA's Classified Systems (12-15), July 23, 2012					

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
1	The Executive for Information Services/CIO, in coordination with the Chief Operating Officer, should ensure all classified system authorization packages are updated in accordance with NARA policy.	Information Services	1/31/2013	12/31/2018	639
2	I, in coordination with C, should establish a timeframe for review and approval of authorization documents.	Information Services	1/31/2013	12/31/2018	639
4	I, in coordination with C, should obtain authorizations to operate for each of the classified systems or disallow them in accordance with NARA and Federal policy.	Information Services	1/31/2013	12/31/2018	639
Audit of NARA's Internal Control Program (13-01), December 10, 2012					
1e	Risk management responsibilities are included in the performance plans for program and function owners.	CFO	9/30/2013	No Change	2557
Audit of NARA's Preservation Program (13-08), July 9, 2013					
2	The Chief Innovation Officer and Executives for Research Services and Legislative Archives, Presidential Libraries and Museum Services, should ensure comprehensive preservation policies and procedures for each of their organizations are developed and/or updated.	Research Services	6/30/2014	7/31/2019	427
3a	The Chief Innovation Officer and Executives for Research Services and Legislative Archives, Presidential Libraries and Museum Services should completely identify the resources necessary to adequately accomplish NARA's preservation mission.	Research Services	6/30/2014	12/31/2019	274
3b	Develop a plan to identify the complete universe of textual and non-textual records that require preservation.	Research Services	3/31/2014	12/31/2019	274

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
4	The Executive for Research Services should ensure a detailed analysis is performed and communicate about the risks versus the benefits associated with not using the existing risk assessment data to calculate the backlog for the Washington area Archives.	Research Services	11/29/2013	12/31/2019	274
5a	The Executive for Research Services should ensure an analysis is performed to determine if additional risk assessments for the Washington area Archives and Presidential Libraries including older holdings should be completed. Identify the risks for not completing the assessments.	Research Services	11/29/2013	12/31/2019	274
5b	The Executive for Research Service should ensure additional measurable performance metrics are developed and implemented to track the progress within the Preservation Program.	Research Services	6/30/2014	7/31/2019	427
5c	The Executive for Research Services should ensure a cost benefit analysis for the HMS circulation Module is completed. Request required resources if the cost benefit analysis identifies benefits to the agency.	Research Services	3/31/2014	No Change	2375
6	The Executive for Legislative Archives, Presidential Libraries and Museum Services should ensure an analysis is performed to identify whether HMS should be implemented across the Libraries. If it is decided HMS will be implemented, a timeline should be established. If it is decided HMS will not be implemented, identify (1) how the existing system will meet the agency's preservation needs and (2) obstacles and risks for not implementing HMS.	LPM	11/29/2013	No Change	2497
Audit of NARA's Preservation Program (13-08), July 9, 2013					

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
1a	The COO should ensure a comprehensive review of the Standards is completed. Additionally, roles and responsibilities for offices involved in the execution of the directive are clearly defined.	Research Services	12/31/2013	No Change	2465
1b	The COO should ensure a plan is developed including a timeline for when the archival storage facility reviews will be completed.	COO	3/31/2014	No Change	2375
1c	The COO should ensure an accurate listing of facilities currently compliant with the Standards along with the area of deficiencies is identified and communicated.	COO	3/31/2014	No Change	2375
1d	The COO should ensure resources needed to make all archival storage facilities compliant by 2016 are identified. If the facility cannot be brought into conformance with the Standards, determine and document what mitigating actions have been implemented.	COO	12/31/2013	No Change	2465
1e	The COO ensures Performance Measurement and Reporting System is updated to accurately reflect percentage of archival holdings in appropriate space.	COO	12/31/2013	No Change	2465
Audit of the ERA System's Ability to Ingest Records (13-11), September 9, 2013					
1	The COO assess Federal agency usage of Base ERA and implement a process to improve the records management workload and records management practices that exist between NARA and Federal agencies to ensure electronic records are being properly transferred into Base ERA.	Agency Services	12/31/2014	No Change	2100
2	The COO identify the most efficient and effective method of ingest and require Federal agencies to follow this method when transferring electronic records into base ERA. In addition this	Research Services	12/31/2014	No Change	2100

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	information should be properly disseminated to Federal agencies.				
Audit of NARA's Processing of Textual Records (13-14), September 18, 2013					
5a	The Executive for Legislative Archives, Presidential Libraries and Museums should work with the Performance and Accountability Office to develop a performance measure for tracking the process of electronic presidential records.	LPM	12/31/2014	No Change	2100
5b	Determine the true backlog of electronic presidential records and determine if additional resources are needed and can be obtained to handle the increased workload.	LPM	3/31/2015	No Change	2100
Audit of Select Aspects of NARA's Sustainability Program: Energy Savings Performance Contracts (14-01), January 30, 2014					
8	NARA should establish formal assessment criteria and future savings analysis for use in determining whether to cancel ESPCs.	CFO	9/30/2015	3/31/2019	549
Audit of NARA's CPIC Process (14-08), April 17, 2014					
1b	The CIO should ensure all required CPIC related documentation is completed for all NARA IT investments going through the CPIC process.	Information Services	2/27/2015	6/28/2019	460
1c	The CIO should require the creation and use of a checklist outlining the IT governance related documentation required to be completed for all IT investments going through the CPIC process.	Information Services	6/30/2015	12/31/2018	639
2	The CIO should require NARA's updated CPIC policies and procedures meet the CPIC process requirements detailed in the Clinger Cohen Act.	Information Services	6/30/2015	12/31/2018	639

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
3	The Chief Operating Officer should ensure NARA IT investments do not bypass NARA's CPIC process.	Information Services	6/30/2015	No Change	1919
5	The COO should ensure I-P maintains documentation of its approval of IT investments in PRISM and I-P's PRISM approval of IT investments is tested on an annual basis with all documentation of this testing sent to NARA's internal controls group.	Information Services	8/31/2015	12/31/2018	639
6	The COO should ensure the training guide for purchase card holders is updated to include a discussion of the requirements of NARA's CPIC Process.	CAO	8/31/2015	No Change	1857
8	The CIO should ensure NARA's IT governance process, which includes CPIC, incorporates the lessons learned when Directive 801 was followed to create a more user-friendly, streamlined, and transparent policy where CPIC requirements align closely with the costs of IT investments.	Information Services	6/30/2015	12/31/2018	639
Oversight of the Audit of Enterprise Wireless Access (14-10), May 9, 2014					
1e	NARA should authorize network operation based on a determination of the risk to organizational operations and assets, individuals, other organizations, and the nation resulting from the operation of the information system and the decision that this risk is acceptable.	Information Services	12/31/2014	3/31/2019	549
4c	NARA should document and approve any deviations from the WLC and WAP baseline configurations.	Information Services	10/29/2014	7/31/2019	427
Audit of NARA's Mobile Device Management (15-02), November 12, 2014					



Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
1c	Develop and document a strong internal control process for determining when an additional charge will be considered for reimbursement.  <i>Funds Put to Better Use - \$2,745</i>	Information Services	4/30/2015	9/30/2019	366
2	Review and update NARA's current policy documents for use of NARA-issued mobile devices, including NARA 813-1 and NARA 802 to reflect more complete and accurate information an acceptable uses of the devices and when a disciplinary action will be requested.	Information Services	4/30/2015	7/31/2019	427
3	Provide training to educate users on acceptable uses of NARA-issued mobile devices, including requesting a travel device for international travel.	Information Services	8/31/2015	9/30/2019	366
4	Develop a formal policy for interaction of NARA-issued mobile devices with other systems and update NARA 813-1 to clearly reflect the policy.	Information Services	4/30/2015	7/31/2019	427
Audit of Specially Protected Records (15-03), February 6, 2015					
2a	Security Management performs initial certifications of Specially Protected Holdings (SPHs) storage areas.	COO	7/31/2017	9/30/2019	366
2b	Security Management performs security inspections of SPHs storage areas.	COO	7/31/2017	9/30/2019	366
4	Ensure Security Management maintains copies or obtains access to SPHs inventory listings and use them to randomly select records and verify their condition and location during inspections.	COO	7/31/2017	9/30/2019	366

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
5a	Ensure SPHs inventory listings are completed at the item level. Establish a timeframe for when the listings must be completed. Communicate with other offices to identify best practices used in documenting their inventories.	Research Services, LPM	9/28/2018	Research Services - No Update  LPM - 3/31/2019	733
5b	Ensure inventory listings are reviewed to determine their accuracy and update as necessary.	Research Services, LPM	9/28/2018	Research Services - No Update  LPM - 3/31/2019	733
5c	Ensure a finding aid is created for the agency's entire SPHs collection at the item level.	Research Services, LPM	9/28/2018	Research Services - No Update  LPM - 3/31/2019	733
5d	Ensure locked hard copies of the inventory listings are maintained.	Research Services, LPM	9/28/2018	Research Services - No Update  LPM - 3/31/2019	733
5e	Ensure SPHs inventory listings are maintained in the Holdings Management System. Until HMS is implemented by all offices, ensure all electronic versions of the listings are password protected and access limited to authorized employees.	Research Services, LPM	9/28/2018	Research Services - No Update	733

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
				LPM - 3/31/2019	
7	Ensure all Presidential Libraries are in compliance with NARA 1572 policy of conducting annual inspections.	LPM	8/31/2017	8/31/2019	396
8a	Initial inspections of SPHs inventory are completed.	Research Services, LPM	8/31/2017	Research Services - No Update  LPM - 8/31/2019	1126
8b	Custodial units are in compliance with NARA 1572, including randomly inspecting at least 3% of SPHs inventory annually on a rotating basis and using one individual that does not work for the individual responsible for the inspection.	Research Services, LPM	8/31/2017	Research Services - No Update  LPM - 8/31/2019	1126
8c	Annual inspection reports include at a minimum date of inspection, individuals that complete the inspections, and a listing of items inspected, including their location and physical condition.	Research Services, LPM	8/31/2017	Research Services - No Update  LPM - 8/31/2019	1126
8d	Annual inspection results are adequately documented and communicated to Security Management and office heads.	Research Services, LPM	8/31/2017	Research Services - No Update  LPM - 8/31/2019	1126

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
10a	Required elements for the handling of SPHs for each record storage area should be communicated to each custodial unit.	Research Services, LPM	7/31/2017	7/31/2019	1157
10b	Detailed procedures are documented for each custodial unit.	Research Services, LPM	7/31/2017	8/1/2019	1157
10c	A process is in place for periodic review of procedures and updates are made as needed.	Research Services, LPM	7/31/2017	8/2/2019	1157
Audit of Digitization Storage (15-11), May 5, 2015					
6	Develop a long-term strategy for increasing transfer capabilities between various internal storage systems housing digitized records.	Information Services	12/31/2015	12/31/2018	639
Audit of NARA's Human Resource (HR) Systems and Data Accuracy (15-13), August 24, 2015					
10	Re-evaluate the option to utilize eCStaffing to manage personnel data for non-Federal workforce at NARA and use the HRMS as the single authoritative data source for the HSPD-12 LACS implementation.	Human Capital	6/30/2016	No Change	1553
11	Establish on authoritative data source that provides the latest data to role-based users on NARA's Federal employees, contractors, and volunteers at the enterprise level.	Information Services	9/30/2016	12/31/2018	639
Audit of NARA's Space Management (15-14), September 29, 2015					
3	Work with R to facilitate consistent application of HMS at all archival facilities, to capture all archival holdings in HMS, and improve how HMS calculates the available space.	Research Services	10/31/2016	9/30/2018	731

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
Oversight of NARA's Cable Infrastructure Assessment (15-15), September 30, 2015					
1	NARA should incorporate all locations into the NARANet SA&A package by documenting location-specific security controls and ensuring that they are appropriately tested and monitored.	Information Services	6/30/16	No Change	1553
2.1	Ensure that neat cable management and labeling mechanisms are employed for all sites.	Information Services	8/31/2016	No Change	1491
2.2	Ensure that all server rooms are equipped with appropriate fire detection and suppression capabilities.	Business Support Services	10/31/2016	3/30/2019	550
2.3	Limit access to all server rooms to those individuals with an explicit need to access IT equipment.	Business Support Services	10/31/2016	3/30/2019	550
2.4	Ensure that appropriate temperature and humidity monitoring and control mechanisms are employed for all server rooms.	Business Support Services	10/31/2016	3/30/2019	550
2.5	Ensure that appropriate UPS devices are employed for hardware supporting the site's network infrastructure.	Business Support Services	10/31/2016	9/30/2018	731
2.6	Ensure that all server racks, switches, and network equipment are adequately secured from unauthorized access via locked racks.	Information Services	4/26/2016	No Change	1618
Audit of NARA Web Hosting (16-01), October 19, 2015					

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
1	The Chief Operating Officer should coordinate with the Chief Innovation Officer to clearly define a business owner for the public facing website process.	Innovation	6/30/2017	12/31/2018	639
2	The COO should coordinate with the CIO, Office of Presidential Libraries and the CINO to develop and document a centralized process to manage the public facing websites.	Innovation	6/30/2017	12/31/2018	639
3	The CIO and CINO should clearly define the roles and responsibilities throughout the process developed in recommendation #2.	Innovation	6/30/2017	12/31/2018	639
5	The CIO and NGC should review and document the approval of all agreements for web hosting services.	Information Services	6/30/2017	6/30/2019	458
6	The CIO should review all of the systems attached to the NARANet general support system to determine if there are any others that are not FISMA compliant.	Information Services	6/30/2017	6/30/2019	458
7	The CIO should coordinate with the CINO to make the web hosting environment FISMA compliant.	Information Services	6/30/2017	6/30/2019	458
8	The COO should coordinate with the CIO and CINO to evaluate whether all of the web hosting environments (internal and external) should be consolidated into one centralized system for FISMA purposes.	Information Services	6/30/2017	12/31/2018	639
10	The CIO should provide Innovation with guidance that clearly delineates the management responsibilities of the web hosting environment between Information Services and Innovation.	Information Services	6/30/2017	6/30/2019	458
12	The CIO, COO, and CINO should retroactively perform or obtain from the contractor, vendor, or partner IT security assessments on vendors that currently host NARA websites.	Information Services	6/30/2017	6/30/2019	458

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
13	The CIO should require an IT security assessment be performed prior to NARA initiating a web hosting agreement.	Information Services	6/30/2017	6/30/2019	458
14	The CIO should ensure that all IT service agreements with external contractors, vendors, or partners have a clause that requires NARA or an independent third-party contractor to annually perform IT security assessments on contractor's, vendor's and partner's external web hosting environment(s) that host NARA websites.	Information Services	6/30/2017	6/30/2019	458
15	The CIO should ensure Information Services personnel document their review of the IT security assessments.	Information Services	6/30/2017	6/30/2019	458
16	The CIO should ensure Information Services include an audit clause in the agreement that requires contractors, vendors, and partners to provide all documentation to the OIG without requiring a signed NDA.	Information Services	8/31/2017	6/30/2019	458
17	Develop a process for managing access to shared user accounts.	Information Services	8/31/2017	6/30/2019	458
18	Implement the annual compliance check required by the User Account Management Standard Operating Procedure for Administrator accounts to the shared user accounts.	Information Services	6/30/2017	6/30/2019	458
28	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	6/30/2017	6/30/2019	458
Oversight of FY2015 FISMA Assessment (16-02), January 16, 2016					
1	For systems utilized by NARA and managed by Cloud Service Providers, NARA should develop and implement formalized	Information Services	3/31/2017	No Change	1279

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	procedures to ensure controls for which NARA has a shared responsibility are reviewed on an annual basis, documented and assessed as to the impact to NARA of any risks that may be present.				
2	NARA should complete the development, approval and deployment of baseline configurations which are currently in progress and ensure that systems are configured in accordance with best practices (including NIST-approved baselines), to include, but not limited to, always changing default credentials at the time of implementation.	Information Services	3/31/2017	No Change	1279
4	NARA should develop, update and implement formalized access control policies and procedures for the B&A, RRS, SCTS and DCU systems.	Information Services	5/31/2017	No Change	1218
13	For future agreements, NARA should: <ul style="list-style-type: none"> <li>· require that providers of external information system services comply with NARA information security requirements.</li> <li>· define and document government oversight and user roles and responsibilities with regard to external information systems, and</li> <li>· establish a process to monitor security control compliance by external service providers on an ongoing basis.</li> </ul>	Information Services	5/31/2017	No Change	1218
14	NARA should add an addendum to current agreements which requires compliance with NARA's information security requirements.	Information Services	6/30/2017	No Change	1188
20	NARA should implement the following corrective actions: <ul style="list-style-type: none"> <li>· complete efforts to implement the Net IQ Sentinel product</li> </ul>	Information Services	3/31/2017	No Change	1279



Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	<ul style="list-style-type: none"> <li>· develop and implement processes and procedures to monitor and at least weekly review user activity and audit logs (in accordance with NARA IT Security Requirements), on the network, RRS, B&amp;A, ENOS-HMS and DCU systems that may indicate potential security violations</li> <li>· Ensure the procurement of new IT system hardware and software, which provides user authentication, includes a minimum set of audit logging controls and functionality in accordance with NARA's IT Security Requirements, AU-2.</li> </ul>				
Audit of NARA's Public Facing Websites (16-05), March 25, 2016					
1a	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites (all recommendations). Coordinate with the CIO on the development of policies and procedures for secure website design and implementation that apply to all NARA publicly-accessible websites.	Innovation	3/31/2017	12/31/2018	639
1c	Regularly (at least quarterly) conducts a comprehensive web vulnerability scan on all NARA publicly-accessible websites.	Information Services	12/31/2016	6/30/2019	458
1d	Documents the process conducting a web vulnerability scan on all publicly-accessible websites.	Information Services	12/30/2016	6/30/2019	458
1g	Requires all NARA publicly-accessible websites to apply NARA's password configuration requirements.	Information Services	3/31/2017	6/30/2019	458
1i	Requires users to change their passwords after a website password reset.	Information Services	3/31/2017	6/30/2019	458

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
1j	Analyzes all publicly-accessible websites to determine if they are vulnerable to all variations of cross-site scripting including reflected.	Information Services	2/28/2017	6/30/2019	458
5	The CIO should document a process to review all security assessments by a qualified official.	Information Services	2/28/2017	7/31/2019	427
6	The CIO should ensure Information Services personnel review all cloud hosting security assessments.	Information Services	2/28/2017	7/31/2019	427
7	The CIO should ensure Information Services personnel document their review of the IT security assessments.	Information Services	2/28/2017	7/31/2019	427
Audit of Inadequate Information and Physical Security Controls at Select Federal Records Centers and Audit of NARA's Refile Processes at Selected Federal Records Centers (16-07), May 17, 2016					
9	The Executive for Agency Services should implement standard IRS document locators at the FRCs.	Agency Services	12/31/2017	3/31/2019	549
10	The Executive for Agency Services establish standardized policies and procedures for the quality control reviews at the FRCs, including: The selection criteria and quality control sample percentage to ensure the quality and timeliness of the quality control review. Physically checking some percentage of refiles selected for review to ensure they were properly refiled. Establishing timeframes for when the reviews must be conducted. Documenting reviews performed, including records selected, errors identified, preparer and reviewer sign-off, and notification to employees and supervisors. Determining the appropriate method for reviewing interfiles. Ensuring different employees are responsible for the batching, selecting the quality control sample, refileing, and quality control review of records. A mechanism for tracking errors identified by employee and	Agency Services	9/30/2017	3/31/2019	549

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	conducting periodic training when consistent errors are identified.				
11	The Executive for Agency Services should conduct training for all employees on the policies and procedures for quality control reviews, including notification of errors and penalties.	Agency Services	12/31/2017	6/30/2019	458
12	The Executive for Agency Services should establish standardized policies and procedures for tracking and documenting IRS record problems, including problems with refiles. Identify timeframes for resolution and when the IRS should assist with resolution.	Agency Services	6/30/2017	12/31/2018	639
13	The Executive for Agency Services should implement a mechanism (database, etc.) to facilitate the problem tracking and resolution process.	Agency Services	6/30/2017	12/31/2018	639
Oversight of Enterprise-Wide Risk Assessment (17-AUD-01), October 28, 2016					
1a	The Chief Operating Officer/Chief Risk Officer should fully implement all components of NARA 160, including developing, documenting, and fully implementing NARA 162, <i>NARA's Enterprise Risk Management Program</i> . Within NARA 162, roles and responsibilities for ERM activities should be clearly identified.	CFO	9/29/2017	6/30/2019	458
1b	The Chief Operating Officer/Chief Risk Officer should fully implement all components of NARA 160, including developing, documenting, and fully implementing NARA 163, <i>NARA's Issues Management</i> .	CFO	9/29/2017	6/30/2019	458
2a	The Chief Operating Officer/Chief Risk Officer should develop, document, and implement a formal process to identify and prioritize risks within the organization. Risks should be tied	CFO	9/29/2017	6/30/2019	458

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	directly to NARA's strategic plan and mission and prioritized based on their overall importance to the agency.				
2b	The Chief Operating Officer/Chief Risk Officer should develop, document, and implement a formal process to prioritize risk management activities, including the use of limited resources based on key risks within the organization. Management's prioritization should be clearly documented and include formal steps to ensure risks are maintained at an appropriate level.	CFO	9/29/2017	6/30/2019	458
3	The Chief Operating Officer/Chief Risk Officer should provide additional resources to the Office of Accountability to ensure ICP activities are effectively carried out.	CFO	9/29/2017	6/30/2019	458
4	The Chief Operating Officer\Chief Risk Officer develop and implement a formal process to review and evaluate the completeness and accuracy of ICP documentation submitted. Validation procedures should include a formal review: To ensure all required documentation has been submitted by the due date. Where documentation has not been provided, NARA should have a formal process in place to follow up and obtain the required documentation. Of ICP documentation submitted to ensure it is both complete and accurate. Where discrepancies are identified, NARA should have a formal process in place to follow up with management so corrections can be made. Of each office's submission to determine whether risks identified and conclusions made are appropriately supported. Of test plans and test results for all high-risk or highly critical functions to ensure they clearly demonstrate the office's methodology for performing testing and reaching conclusions. Of monitoring plans and monitoring results for all functions that clearly show the extent of monitoring performed, the office's methodology	CFO	9/29/2017	6/30/2019	458

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	for performing the monitoring, and the rationale for its conclusions.				
5	The Chief Operating Officer/Chief Risk Officer should develop and fully implement a formal ICP training program. NARA's ICP training program should identify and require individuals who are involved with NARA's ICP to complete initial training and refresher training periodically thereafter. Further, management should track completion of ICP training to ensure all individuals involved in the ICP process have received adequate training.	CFO	9/29/2017	6/30/2019	458
Audit of NARA's Compliance with the Federal Managers Financial Integrity Act for FY15 (17-AUD-03), November 4, 2016					
2	The Archivist should implement or upgrade current internal control software or utilize other mechanisms to enhance and improve the agency's ability to track and report on internal controls.	CFO	9/29/2017	6/30/2019	458
4	The Archivist should ensure the MCOC tracks and manages all high-level risks.	CFO	9/29/2017	6/30/2019	458
5b	The Archivist should address outstanding recommendations from OIG Audit Report No. 13-01, including revisiting his decision on the placement and role in the organization of the Chief Risk Officer.	CFO	9/29/2017	6/30/2019	458
6a	NARA Executives should ensure monitoring and testing plans are sufficiently reported in the ICP Tool.	CFO	9/29/2017	6/30/2019	458
6b	NARA Executives should ensure results of monitoring and testing plans are achievable within the reporting timeframe.	CFO	Unresolved	N/A	1426

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	<i>Unresolved - The agency did not agree to implement the recommendation.</i>				
6c	NARA Executives ensure all information is up-to-date and reflects the current control environment.	CFO	9/29/2017	6/30/2019	458
7	NARA Executives should identify, develop, and include in ICP reports measurable indicators to evaluate functions.	CFO	9/29/2017	6/30/2019	458
8	NARA Executives should update NARA Directive 101 to include internal control responsibilities for each office.  <i>Unresolved - The agency did not agree to implement the recommendation.</i>	CFO	Unresolved	N/A	N/A
9	The ICP Official develop and implement a consistent risk assessment process and format for risk ranking, analysis of effect or impact, and risk reporting.	CFO	9/29/2017	6/30/2019	458
10	The ICP Official should review the ICP reports and make and document any revisions necessary to the format to ensure all necessary information is obtained in the reports.	CFO	10/31/2017	6/30/2019	458
Audit of NARA's Management Control over Access Applications (17-AUD-04), November 18, 2016					
2	The CIO should, in conjunction with each program office, implement the security assessment process as described in NARA's Enterprise Architecture to those applications/databases determined critical to carrying out NARA's or program offices' missions from Recommendation 1.	Information Services	12/31/2017	12/31/2018	639
3	The CIO should, in conjunction with each program office, develop and implement a comprehensive, systematic process to	Information Services	6/30/2017	12/31/2018	639

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	determine when a MS Access application or database should be recognized as an IT system.				
4	The CIO should, in conjunction with each program office, determine all MS Access databases containing PII and ensure they are: (a) encrypted in storage and transmission; and (b) password-protected in accordance with NARA Directive 1608 and the Privacy Act.	Information Services	12/31/2017	11/30/2018	670
5	The CIO should, in conjunction with each program office, develop and implement a process, for future MS Access applications and databases created by program offices, including notification to and approval from the Office of Information Services for those that are mission-critical and/or contain PII or otherwise sensitive information.	Information Services	4/30/2017	12/31/2018	639
Audit of NARA's Procurement Program (17-AUD-06), November 15, 2016					
3	The Chief Acquisition Officer should formally appoint a Senior Procurement Executive and procurement officials who are authorized to approve warrants over \$100,000,000 and approve warrant for construction and architectural-engineering services contracting officers.	CAO	5/14/2017	12/31/2018	639
5	Competition Advocate, in collaborations with the CAO, should develop and implement procedures to promote the acquisition of commercial items and report annually new initiatives to the CAO and SPE.	CAO	5/14/2017	12/31/2018	639
6	The CAO should develop and implement procedures to ensure contracting offices in Acquisitions Branch and Space Planning	CAO	5/14/2017	12/31/2019	274

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	and Projects Branch report all contract related activity to the SPE.				
7	The CAO should ensure NARA 501 NARA Procurement policy and NARA's General Acquisition Policy addresses procurements related to Architecture/Engineering and Construction.	CAO	5/14/2017	12/31/2019	274
8	The CAO should, in collaboration with CFO, Director of Acquisitions, and program managers, develop and implement procedures for proper planning of new contracts with NARA funds.	CAO	5/14/2017	12/31/2018	639
9	The CAO should develop and implement procedures to ensure contracts are evaluated to identify contracts that are wasteful, inefficient, or unlikely to meet NARA needs.	CAO	5/14/2017	12/31/2019	274
10	The CAO and SPE should develop and implement test plans and procedures to assess internal control over acquisition activities and programs using OMB Memorandum, <i>Conducting Acquisition Assessments</i> .	CAO	5/14/2017	12/31/2019	274
11	The CAO should modify procedures to ensure all contracting activity, including Architecture/ Engineering, construction services are included in random selections for internal control reviews.	CAO	5/14/2017	12/31/2018	639
13	The CAO should include Contracting Officers who are not GS1102's, Contracting Officer Representatives and Program and Project Managers in the internal control program test plan.	CAO	5/14/2017	12/31/2019	274
14	The CAO should establish various performance metrics to be tracked and analyzed on how long the acquisition takes, where delays occur and why delays occur.	CAO	5/14/2017	12/31/2018	639



Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
15	The CAO should develop and implement meaningful and measurable performance metrics to continually assess the performance of the acquisition function in supporting NARA's mission and achieving acquisition goals.	CAO	5/14/2017	12/31/2018	639
16	The CAO should ensure NARA 501 NARA Procurement policy include guidance to program offices on their responsibilities in the procurement process.	CAO	5/14/2017	12/31/2018	639
18	The CAO should assess staffing needs for NARA's Procurement Program to ensure the procurement program has sufficient staff to maintain effective, efficient operations and adhere to Federal and internal guidance.	CAO	5/14/2017	12/31/2018	639
23	The ACM should ensure NARA Certification for Program and Project Managers Applications are signed by the Deputy Archivist in accordance with NARA policy and maintained.	CAO	5/14/2017	12/31/2019	274
24	The CAO should ensure all contracting officers, regardless of their government series, be certified at an appropriate level; and any contracting professional issued an unlimited warrant be level III certified.	CAO	5/14/2017	12/31/2018	639
25	The CAO should establish and implement procedures for potential administrative or disciplinary actions for contracting officers, and contracting officer representatives, and other contracting professionals that do not have their Federal Acquisition Certifications or continuous trainings required by OMB guidance. For example, if after one year from notice the contracting professional still does not have appropriate certificates and/or training, disciplinary action, removal of warrant or removal from the position may occur.	CAO	5/14/2017	12/31/2019	274

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Audit of NARA's Compliance with HSPD-12 (17-AUD-07), February 19, 2017					
2	Chief of Management and Administration or designee should develop 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 Homeland Security Presidential Directive 12 (HSPD-12).	Information Services	12/29/2017	No Change	1006
3	Chief of Management and Administration or designee should use existing budgetary resources to fully implement HSPD-12.	Information Services	12/29/2017	No Change	1006
4	Chief of Chief of Management and Administration or designee should establish a reasonable date to fully implement HSPD-12.	Information Services	12/29/2017	No Change	1006
Audit of NARA's Adoption and Management of Cloud Computing Activities (17-AUD-08), March 15, 2017					
1	The CIO should, acting as the centralized authority for NARA's cloud computing program, should take the lead and collaborate with business areas such as Acquisitions and General Counsel, to develop, approve, and implement comprehensive policies and procedures which will coordinate activities and establish key control points for NARA's cloud computing program.	Information Services	12/29/2017	3/31/2019	549
2	The CIO should complete and document a review of existing IT systems for cloud compatibility.	Information Services	12/29/2017	3/31/2019	549
3	The CIO should update the Enterprise Cloud Strategy with clearly defined roles and responsibilities, and develop and implement a written plan to execute the strategy.	Information Services	12/29/2017	3/31/2019	549

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
4	The CIO should conduct and document a risk assessment specific to NARA's implementation of cloud computing in coordination with NARA's Chief Risk Officer.	Information Services	12/29/2017	3/31/2019	549
6	The CIO should establish and approve a centralized reporting point for cloud computing inventory and develop, implement and communicate a written mechanism to standardize tracking cloud computing inventory across NARA's business area lines.	Information Services	12/29/2017	3/31/2019	549
7	The CIO should coordinate with necessary business areas including Acquisitions and General Counsel to develop, approve, and implement its written cloud provisioning guidelines.	Information Services	12/29/2017	3/31/2019	549
8	The CIO should coordinate with necessary business areas including Acquisitions and General Counsel to develop, approve, and implement its IT Security Contractual Requirements in addition to a method to monitor and enforce the use of the standards.	Information Services	12/29/2017	3/31/2019	549
9	The CIO, in conjunction with Acquisitions and General Counsel should develop, approve, and implement written standards for centralized maintenance and standardized monitoring of service level agreements and formally communicate the requirement to those who need it.	Information Services	12/29/2017	3/31/2019	549
10	The CIO should coordinate with the Chief Acquisitions Officer, and General Counsel to establish a working group to evaluate and monitor recommendations and best practices for cloud computing procurement in order to improve the content and effectiveness of the CPIC Business Case Form.	Information Services	6/30/2018	3/31/2019	549
Audit of NARA's FOIA Program (17-AUD-16), September 27, 2017					

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
9	Utilize updated processing mechanisms or processes to increase the efficiency and effectiveness of the FOIA Program.	NGC	12/31/2019	9/30/2022	-730
Audit of the Office of the Federal Register's Administration of the Electoral College Process (18-AUD-04), February 26, 2018					
4	Obtain an independent authoritative review of the requirements in 3 U.S.C. § 6 and 11. Based on the outcome of the review, document the OFR's procedures for receiving certificates via registered mail.	Federal Register	11/30/2018	No Change	670
5	Review ICP reports to ensure accuracy and documentation is available to support information documented in the quarterly reports.	Federal Register	11/30/2018	1/29/2021	-121
Audit of NARA's Legacy Systems (18-AUD-06), March 29, 2018					
1	The CIO develop a definition of a legacy system.	Information Services	9/30/2019	No Change	366
2	The CIO in coordination with the program offices document when the system was put into production and the life expectancy of each system.	Information Services	9/30/2018	No Change	731
4	The CIO create a centralized process to track legacy systems.	Information Services	9/30/2018	No Change	731
6	The CIO in coordination with System Owners Ensure all seven systems are adequately tracked, monitored, and the proper security controls are in place until they are subsumed within the ERA 2.0 project or other systems as planned.  <i>Funds Put to Better Use - \$45,350,000</i>	Information Services	9/30/2019	No Change	366

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
8	The CIO develop and implement an operational analysis policy as required by OMB 10-27.	Information Services	9/30/2018	No Change	731
9	The CIO coordinate with each Program Office to conduct and document an operational analysis for IT investments currently in production in accordance with the policy in recommendation 8.	Information Services	12/31/2019	No Change	274
10	The CIO ensure risk assessments and risk assessment reports are completed and/or reviewed annually and updated accordingly for all NARA systems.	Information Services	12/31/2019	No Change	274
Audit of Human Capital Practices (18-AUD-09), June 4, 2018					
1	The Chief of Management and Administration ensure all NARA Human Capital policies are reviewed, revised, finalized, and implemented.	CMA	12/31/2020	No Change	-92
2	The Chief of Management and Administration ensure all electronic Official Personnel Folders for employees with previous federal employment have been transferred to NARA. Also, ensure all employee official records while employed at NARA are uploaded into the eOPF.	CMA	12/31/2020	No Change	-92
3	The Chief of Management and Administration ensure a review of system data integrity is conducted and erroneous data is removed from Human Capital systems.	CMA	12/31/2020	No Change	-92
4	The Chief of Management and Administration ensure all SCDs are accurate.	CMA	12/31/2020	No Change	-92
Audit of NARA's Continuity of Operations (COOP) Readiness (18-AUD-14), August 20, 2018					

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
2	The Chief Information Officer: determine the laptop computer needs for all current ERG, DERG, and RIT/RPT member employees, in consultation with Executives responsible for executing the PMEFS, MEFs, and ESAs for NARA; conduct a cost-benefit analysis for providing a government-furnished laptop computer to those employees identified from (a); and(c) provide a government-furnished laptop computer to the ERG, DERG, and RPT/RIT member employees, based on the analyses conducted from (a) and (b) above.	Information Services	3/29/2019	No Change	551
19	The Chief Information Officer, in coordination with the Office of Federal Register, develop and implement a process to maintain an up-to-date security authorization package for the EFR system, which includes a system security plan, security assessment report, risk assessment report, plan of action and milestones (PO&M), contingency plan, contingency plan test, and business impact analysis.	Information Services	3/31/2020	No Change	183
20	The Chief Information Officer develop and implement a process to update the contingency plan, contingency plan test results, and business impact analysis on an annual basis for all information systems with a FIPS PUB 199 security categorization of moderate or high.	Information Services	3/31/2020	No Change	183
Audit of NARA's FY 2018 Consolidated Financial Statements (19-AUD-01), November 8, 2018					
1a	We recommend that the NARA Chief Information Officer continue to analyze and prioritize remediation efforts to accomplish security and control objectives. Key tasks should include, but are not limited to (all recommendations): Ensure user accounts are reviewed and disabled in accordance with NARA's information technology policies and requirements (repeat recommendation).	Information Services	10/30/2020	No Change	-30

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
1f	Ensure plans of actions and milestones are created, updated and remediated, for each system, in accordance with NARA policies, guidance and directives (repeat recommendation).	Information Services	10/30/2020	No Change	-30
1g	Implement remediation efforts to address security deficiencies identified during our assessments of NARA's database platforms and network infrastructure (repeat recommendation).	Information Services	9/30/2019	No Change	366
1h	Fully complete the migration of applications to vendor supported operating systems (repeat recommendation).	Information Services	9/30/2019	No Change	366
Audit of NARA's Compliance with FISMA (19-AUD-02), December 14, 2018					
1	To assist NARA in strengthening its agency-wide information security program, CLA recommends the CIO ensure complete security authorization packages for each major application and general support system are completed prior to deployment into production.	Information Services	10/30/2020	No Change	-30
2	To assist NARA in strengthening its agency-wide information security program, CLA recommends the CIO ensure SSPs are developed for all NARA systems in accordance with NARA policy.	Information Services	10/30/2020	No Change	-30
3	To assist NARA in strengthening its agency-wide information security program, CLA recommends the CIO ensure SSPs are reviewed and updated for all NARA systems in accordance with NARA policy to ensure any missing control implementation details are completed, and missing privacy controls added.	Information Services	10/30/2020	No Change	-30
4	To assist NARA in strengthening its agency-wide information security program, CLA recommends the CIO conduct risk assessments for each system in operation and establish policies	Information Services	10/30/2020	No Change	-30

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	or procedures to ensure that risk assessments are conducted at least annually.				
6	To assist NARA in strengthening its agency-wide information security program, CLA recommends the CIO ensure all systems have POA&Ms created when weaknesses are identified, to include completion dates; are remediated timely; and are updated to include detailed information on the status of the corrective actions.	Information Services	10/30/2020	No Change	-30
8	To assist NARA with strengthening its policy and procedure development and authorization controls, CLA recommends the Chief Information Officer in coordination with Strategy and Performance staff ensure IT policies, procedures, methodologies and supplements are reviewed and approved in accordance with NARA Directive 111.	Information Services	9/30/2019	No Change	366
9	To assist NARA with strengthening its ISSO management controls, CLA recommends the CIO assign ISSO's for all major applications and general support systems.	Information Services	9/30/2019	No Change	366
12	To assist NARA with strengthening its vulnerability management controls, CLA recommends the CIO Implement improved processes to remediate security deficiencies on NARA's network infrastructure, to include enhancing its patch and vulnerability management program to address security deficiencies identified during our assessments of NARA's applications and network infrastructure.	Information Services	9/30/2019	No Change	366
13	To assist NARA with strengthening its vulnerability management controls, CLA recommends the CIO Ensure all information systems are migrated away from unsupported	Information Services	9/30/2019	No Change	366



Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	operating systems to operating systems that are vendor-supported.				
15	To assist NARA in continuing to strengthen the identification and authorization controls, CLA recommends the CIO ensure user system accounts for all systems are periodically reviewed and automatically disabled in accordance with NARA policy.	Information Services	10/30/2020	No Change	-30
16	To assist NARA in continuing to strengthen the identification and authorization controls, CLA recommends the CIO ensure upon termination of employment, all system access is disabled in accordance with the applicable system security plan defined period, as described under control PS-4 "Personnel Termination."	Information Services	9/30/2019	No Change	366
17	To assist NARA in continuing to strengthen the identification and authorization controls, CLA recommends the CIO ensure user access request forms are retained for each user account on all systems.	Information Services	9/30/2019	No Change	366
18	To assist NARA in continuing to strengthen the elevated privileged user training controls, CLA recommends the Chief Information Officer ensure individuals assigned elevated privileges have their user accounts disabled if they have not completed their security awareness training by their scheduled completion date.	Information Services	9/30/2019	No Change	366
20	To assist NARA in strengthening its audit logging processes, CLA recommends the CIO ensure audit logging is enabled for each major information system.	Information Services	10/30/2020	No Change	-30
21	To assist NARA in strengthening its audit logging processes, CLA recommends the CIO ensure periodic reviews of	Information Services	10/30/2020	No Change	-30

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	generated audit logs are performed for each major information system.				
22	To assist NARA in strengthening its user authentication controls, CLA recommends the CIO ensure password configuration settings for all major information systems are in accordance with NARA IT Security Requirements.	Information Services	10/30/2020	No Change	-30
23	To assist NARA in strengthening its user authentication controls, CLA recommends the CIO ensure the use of shared/group accounts is restricted to only those users with a valid business justification, by enhancing user account review procedures to incorporate reviews of shared/group account membership and reasonableness.	Information Services	12/31/2019	No Change	274
24	To assist NARA in strengthening its user authentication controls, CLA recommends the CIO ensure a process is developed, documented and implemented to change passwords whenever users within shared/group accounts change.	Information Services	10/30/2020	No Change	-30
27	To assist NARA in strengthening its contingency planning controls, CLA recommends the CIO test the contingency plans for all NARA systems to include documentation of test plans, results and any needed updates to the contingency plan, and establish controls to ensure annual testing of contingency plans.	Information Services	10/30/2020	No Change	-30
Audit of Presidential Libraries' Analog Processing (19-AUD-03), December 20, 2018					
1	Implement procedures to ensure consistent implementation of NARA's Processing Policy across all Presidential Libraries.	LPM	12/31/2019	9/30/2020	0
2	Implement procedures to ensure consistent and accurate reporting of basic processing totals across all Presidential Libraries.	LPM	12/31/2019	9/30/2020	0

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
3	Direct all Presidential Libraries to assess their holdings to determine the correct percentage of basic processing work as stipulated in NARA's Analog Records Processing Policy.	LPM	12/31/2019	9/30/2020	0
4	Implement procedures for quality control review of processed holdings across all Presidential Libraries.	LPM	12/31/2019	9/30/2020	0
5	Implement procedures to require adequate support for ICP reporting.	LPM	12/31/2019	9/30/2020	0
6	Identify digitization as a function of LP and follow all reporting instructions under NARA Directive 161 and related appendices.	LPM	6/30/2019	9/30/2020	0
Audit of NARA's Purchase Card Program (19-AUD-07), March 29, 2019					
1a	Enhancing instructions to approving officials to look for sales tax paid by a cardholder, recurring purchases, and split purchases.	CFO	11/30/2019	No Change	305
1b	Enhancing the monitoring of the approving officials timely verification of purchase card transactions.	CFO	11/30/2019	No Change	305
1c	Documenting the monitoring of purchase card transactions to ensure cardholders' recover sales tax paid and/or make a good-faith attempt to recover sales tax paid.	CFO	11/30/2019	No Change	305
1d	Documenting the monitoring of purchase card transactions to ensure split purchases are not occurring.  <i>Questioned Costs - \$8,217</i>	CFO	11/30/2019	No Change	305
1e	Monitoring purchase card transactions to ensure separation of duties from authorizing the purchases and making purchases.  <i>Questioned Costs - \$2,598</i>	CFO	11/30/2019	No Change	305

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
2	Ensure Accounting Policy and Operations and Acquisitions purchase card policies are updated to reflect current practices.	CFO	11/30/2019	No Change	305
3	Ensure Accounting Policy and Operations and Acquisitions update the controls and the methods used to monitor controls associated with the purchase card program.  <i>Questioned Costs - \$121,001</i>	CFO, CAO	11/30/2019	No Change	305
4	Enforce the current policy of rescinding cardholder and approving official privileges if they fail to complete refresher training.	CAO	11/30/2019	No Change	305
5	Improve the alternate control by informing cardholders and approving officials months prior to the refresher training due date.	CAO	11/30/2019	No Change	305
Audit of NARA's Oversight of Electronic Records Management in the Federal Government (19-AUD-10), June 11, 2019					
1	Recommend the Management Control Oversight Council consider reporting the Electronic Records Management deficiencies identified in the audit report as a material weakness under Federal Managers' Financial Integrity Act.	Agency Services	12/31/2019	No Change	274
4	Complete validation and data entry of the legacy permanent disposition authorities into ERA in a timely manner.	Agency Services	7/31/2020	No Change	61
6	Review whether existing technology for identifying gaps in electronic record accessions is sufficient and if not request funding or identify another option to reasonably ensure permanent electronic records are identified, scheduled, and ultimately obtained by NARA.	Agency Services	12/31/2020	No Change	-92

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
8	Codify in CFR how often Federal agencies are required to review record schedules.	Agency Services	12/31/2020	No Change	-92
9	Contact Federal agencies currently using record schedules approved before January 1, 1990 and require the schedules be reviewed.	Agency Services	9/30/2020	No Change	0
Audit of NARA's Classified Information Systems (20-AUD-03), December 12, 2019					
1	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	12/31/2022	No Change	-822
2	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	12/31/2021	No Change	-457
3	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	12/31/2022	No Change	-822
4	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	12/31/2023	No Change	-1187
5	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	12/31/2022	No Change	-822

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
6	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	3/31/2023	No Change	-912
7	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	3/31/2023	No Change	-912
8	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	4/30/2020	No Change	153
10	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	8/30/2020	No Change	31
11	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	12/31/2022	No Change	-822
12	This recommendation contains information about IT deficiencies which, if made public, could endanger NARA systems. Please contact the OIG if you need further information.	Information Services	3/31/2023	No Change	-912
Audit of NARA's Oversight and Management of Information Technology Contract (20-AUD-06), March 4, 2020					
1	Ensure the CAO's delegated responsibilities and authorities as outlined in NARA Directive 101, NARA Organization and	CAO	11/30/2020	No Change	-61

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
	Delegation of Authority, are reflected in the CAO's position description and performance plan.				
2	Ensure the Chief Acquisition Officer is adequately positioned to regularly engage with NARA's Management Team and senior management in order to advise and assist the agency head and other agency officials to ensure the mission of the agency is achieved through the acquisition management activities.	CAO	6/30/2020	No Change	92
3	Establish and document an acquisition workforce strategic plan to address achieving the objectives of key acquisition positions.	CAO	12/31/2020	No Change	-92
4	Issue written guidance that requires appointment of Contracting Officer's Representatives with Level III certification for those contracts with major IT investments.	CAO	11/30/2020	No Change	-61
5	Establish an appointment matrix to ensure consistent identification and assessment of risks for IT contracts.	CAO	11/30/2020	No Change	-61
6	Issue written guidance to Contracting Officers that requires use of the appointment matrix established in Recommendation 5 when determining the appropriate Contracting Officer's Representative certification level.	CAO	11/30/2020	No Change	-61
7	Revise Interim Guidance 810-2, NARA's Implementation of Federal Acquisition Certification for Program and Project Managers in accordance with the Office of Federal Procurement Policy, Revisions to Federal Acquisition Certification for Program and Project Managers, dated, December 16, 2013, including NARA's implementation of reciprocal acquisition certifications.	CAO	11/30/2020	No Change	-61

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
Audit of NARA's FY 2019 Consolidated Financial Statements (20-AUD-08), April 22, 2020					
1	Continue to analyze and prioritize remediation efforts to accomplish security and control objectives. Key tasks should include, but are not limited to (all recommendations): Ensure NARANet user accounts are reviewed and disabled in accordance with NARA's information technology policies and requirements (repeat recommendation).	Information Services	9/30/2020	No Change	0
2	Coordinate with other departments as necessary, to implement an authoritative data source which provides the current status of NARA contractors and volunteers at the enterprise level.	Information Services	12/31/2021	No Change	-457
3	Ensure plans of actions and milestones for the NARANet and OFAS systems are created, updated and remediated, for each system, in accordance with NARA policies, guidance and directives (repeat recommendation).	Information Services	9/30/2020	No Change	0
4	Document and implement a process to track and remediate persistent configuration vulnerabilities, or document acceptance of the associated risks.	Information Services	12/31/2020	No Change	-92
5	Implement remediation efforts to address security deficiencies on affected systems identified, to include enhancing its patch and vulnerability management program as appropriate, or document acceptance of the associated risks (repeat recommendation).	Information Services	12/31/2021	No Change	-457
6	Fully complete the migration of applications to vendor supported operating systems (repeat recommendation).	Information Services	12/31/2021	No Change	-457
8	Verify that ARC has implemented the appropriate corrective actions to ensure that future errors are mitigated.	Information Services	9/30/2020	No Change	0



Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
9	Implement monitoring procedures over ARC processes to ensure potential and actual errors are internally reviewed, mitigated, and corrected on a timely basis.	CFO	9/30/2020	No Change	0
10	Correct the funding deficiency for the contract in question.	CFO	9/30/2020	No Change	0
11	Report the Antideficiency Act violation in accordance with Title 31, Section 1351 of the U.S. Code and OMB guidance.	CFO	9/30/2020	No Change	0
Management Letter: Control Deficiencies Identified During the Audit of NARA's Financial Statements for Fiscal Year 2019 (20-AUD-09), April 22, 2020					
1	Update the travel policy to ensure that all written policies and procedures are reviewed and revised timely.	CFO	6/30/2021	No Change	-273
NARA's Use of the 2017 Women's March Image (20-R-11), May 15, 2020					
1a	We recommend the Chief Operating Officer revise, develop, and implement policies and procedures to standardize the exhibit development process, and ensure: a) The guidance incorporates protocols for addressing sensitive topics and operational risks including adequate control activities; such as, but not limited to, documented supervisory reviews/approvals;	COO	Not Provided	N/A	N/A
1b	The policies and procedures are communicated to staff; and	COO	Not Provided	N/A	N/A
1c	There is a documented plan to periodically review and revise the policy directive(s) or any associated interim guidance in accordance with NARA 111, NARA Directives.	COO	Not Provided	N/A	N/A
Audit of NARA's Personnel Security and Suitability Program (20-AUD-12), June 18, 2020					

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
1	Review, update, and implement revised NARA Directive 273, Administrative Procedures for Security Clearances, NARA Directive 273 Supplement, Supplement Administrative Procedures Related to Security Clearances and Applicant and Employee Rights, NARA Directive 275, Background and Identity Verification Process for Access Privileges, and NARA Directive 276, Employment or Service Suitability Determinations.	Business Support Services	6/30/2021	No Change	-273
2	Ensure all Security Management Personnel Security staff is familiar with updated policies.	Business Support Services	6/30/2021	No Change	-273
4	Develop and implement standard operating procedures for: position risk designations; access requirements for federal employees; background investigations; suitability and security clearance determinations; granting, suspending, or revoking security clearances; and any other aspects of the Personnel Security Program that Management determines requires standard operating procedures.	Business Support Services	12/31/2020	No Change	-92
5	Establish standards and procedures for the Personnel Security Program to ensure re-investigations, pre-screening, and follow-up on submitted investigations are completed timely.	Business Support Services	12/31/2020	No Change	-92
6	Establish management oversight of the adjudication process, including more stringent review of serious adjudication issues with associated signoffs and documentation requirements.	Business Support Services	12/31/2020	No Change	-92
8	Implement standard timeframes to complete adjudications.	Business Support Services	12/31/2020	No Change	-92

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
11	The Executive for Business Support Services ensure all active NARA employees and contractor files are scanned into Security Clearance Tracking System.	Business Support Services	6/30/2021	No Change	-273
12	The Executive for Business Support Services establish standards and review procedures over the entry of information into Security Clearance Tracking System fields to ensure consistency and accuracy.	Business Support Services	12/31/2020	No Change	-92
13	The Executive for Business Support Services ensure all Security Clearance Tracking System data fields are complete and accurate for active employees.	Business Support Services	6/30/2021	No Change	-273
14	The Executive for Business Support Services and Chief Human Capital Officer reconcile Federal Personnel Payroll System and Security Clearance Tracking System position sensitivity ratings to ensure the two systems accurately reflect the proper sensitivity rating.	Business Support Services and Human Capital	12/31/2020	No Change	-92
15	The Chief Human Capital Officer, in collaboration with Business Support Services, review discrepancies in position sensitivity ratings based on the reconciliation of Federal Personnel Payroll System and Security Clearance Tracking System data, and take action to correct any position descriptions that are not classified at the proper risk level for the position.	Human Capital	12/31/2020	No Change	-92
Audit of NARA's Cybersecurity Risk Management Process (20-AUD-15), August 27, 2020					
1	Ensure the Risk Executive, Chief of Management and Administration, Chief Operating Officer, and Senior Accountable Official for risk management roles and responsibilities are fully and accurately defined in NARA policies.	CMA and COO	12/31/2021	No Change	-457

Rec. No.	Recommendation Text	Office	Original Implementation Date	Revised Implementation Date	Days Past Due <sup>2</sup>
2	Develop, document, implement, and disseminate an organizational risk management strategy and policy, in accordance with NIST 800-39, and a process for coordination between cybersecurity and enterprise risk management.	CMA	12/31/2021	No Change	-457

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