OFFICE *of* INSPECTOR GENERAL
NATIONAL ARCHIVES

March 21, 2019

TO: David S. Ferriero
                Archivist of the United States

FROM: James Springs
                Inspector General

SUBJECT: *Compendium of Open OIG Recommendations to NARA*
                OIG Special Report No. 19-R-04

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, 2018.[1] An open recommendation is a recommendation previously documented in a report for which agreed upon corrective actions have not been implemented by NARA. As of September 30, 2018, there were 346 open recommendations, aging between less than one to eleven years old.

It is imperative that NARA work towards implementing corrective actions, including tracking current actions 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.

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 to corrective action and (2) resolution shall be made within a maximum of six months after issuance of a final report. Based on closure of recommendations in FY2018, on average NARA takes approximately 92 months to implement corrective actions.

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[1] The 2018-2019 federal government shutdown contributed to the late issuance of the Compendium.

Our reports document deficiencies identified in audits or other OIG products and any recommendations that we believe if implemented would result in improvements to NARA programs. As a part of the reporting process, NARA Management is provided an opportunity to provide a written response to audit the recommendation, including acceptance or rejection, and any proposed corrective action to address the recommendation.

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.

Status of Open Recommendations

In an effort to address long-standing open recommendations, in March 2018, the OIG alerted NARA Management about NARA's slow progress in addressing open recommendations. The OIG requested management review and document the implementation status, update any planned actions, and propose new target completion dates for each open recommendation. The majority of NARA offices responded to the OIG's request with useful information, while it appeared other offices did not. Between October and November 2018, the OIG also held meetings with NARA offices to discuss the documentation received and to agree to new target completion dates for open recommendations. It is apparent the importance of closing open recommendations varies among offices. Some offices have made it a priority while others have not. Additionally, there are offices that lack the understanding of what is required to close recommendations or how long it will take to implement agreed upon corrective actions. Based on the documentation received and meetings held, the OIG noted the Office of Chief Information Officer (CIO) has not worked effectively to close open recommendations timely.

Office of Chief Information Officer

Based on documentation originally received and meetings held with the Office of the CIO, it did not appear the Office performed an adequate review of their recommendations. Specifically, there was minimal information on work performed since issuance of recommendations, work to be performed, or achievable target completion dates. While the CIO Office eventually provided updated information, this information still lacked details and showed little or no progress was made to implement corrective actions for open recommendations. Additionally, the CIO provided revised implementation dates, but according to staff in the CIO's Services and Compliance Division, those dates were random and not actually based on communication with CIO subject matter experts, work performed, or work to be performed. Based on information provided, this Office does not appear to have a clear understanding of some of their open recommendations and agreed upon corrective actions.

The OIG agrees with the Office's assertion that many of the Office's findings were repeated from previous reports. However, until root causes are adequately addressed and resolved, the OIG will continue to report these findings. Although the office points to turnover, current OIG audits, and Internal Control Reporting as the cause of the Office's failure to close recommendations, the OIG emphasizes the Office's lack of (1) accountability, (2) effective coordination in addressing recommendations, and (3) a proper mechanism to prioritize and properly track the growing number of open recommendations are the main causes. This is of major concern because the Office has responsibility for 45% of NARA's open recommendations, resulting in information technology security remaining one of NARA's Top Ten Management Challenges.

The attachment provides a summary of our review of the open recommendations (Figures 1 through 3), including a detailed listing of all open recommendations with some revised implementation dates based on agreement between the OIG and Offices (see pages 8-67). The OIG plans to report quarterly to NARA management on the agency's progress in closing recommendations. Going forward this report will be completed on an annual basis.

The OIG will continue to meets 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, Chief Human Capital Officer
     Swarnali Haldar, Chief Information Officer
     Colleen Murphy, Chief Financial Officer
     Pamela Wright, Chief Innovation Officer
     Gary Stern, General Counsel
     Laurence Brewer, Chief Records Officer
     Oliver Potts, Director of Federal Register
     Jay Trainer, Executive for Agency Services

Ann Cummings, Executive for Research Services
Susan Donius, Acting 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

This report identifies 346 open recommendations from OIG reports as of September 30, 2018. Majority of the open recommendations are within Information Services (see Figure 1). 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.

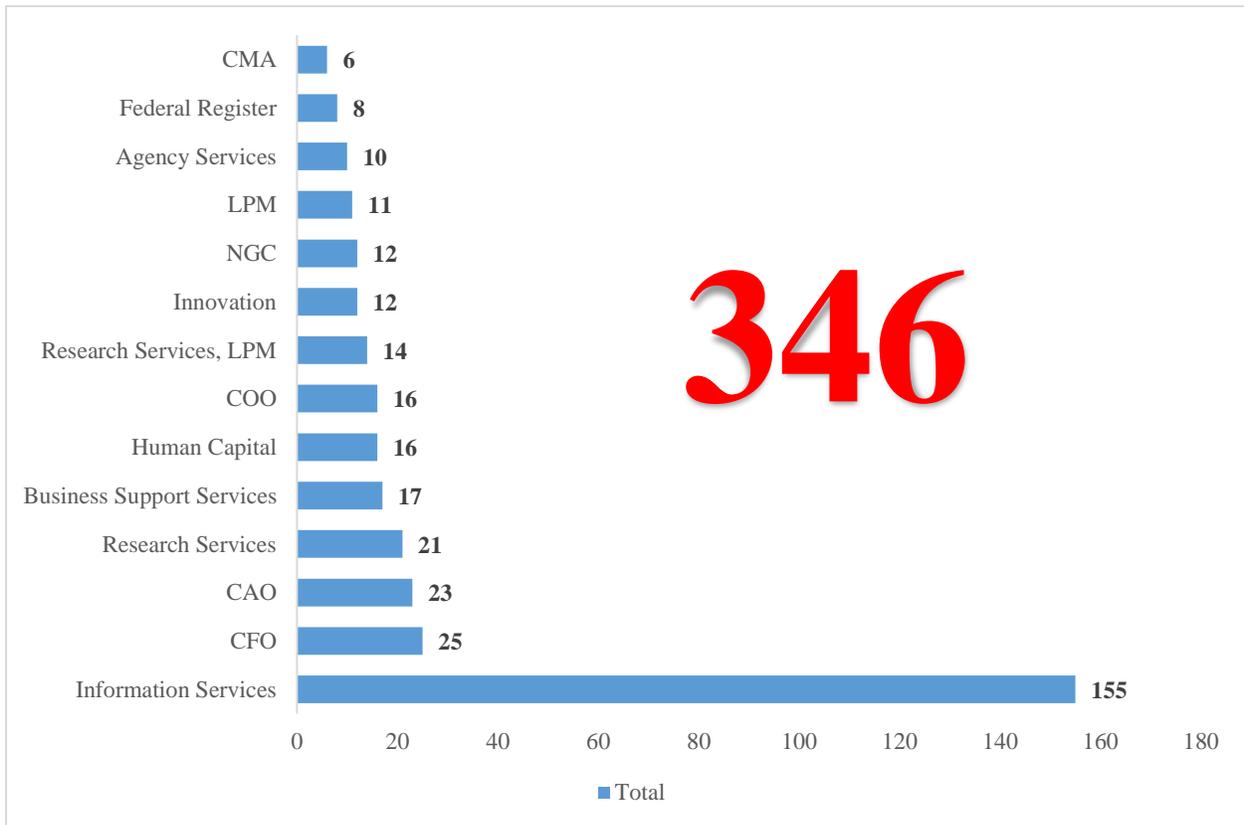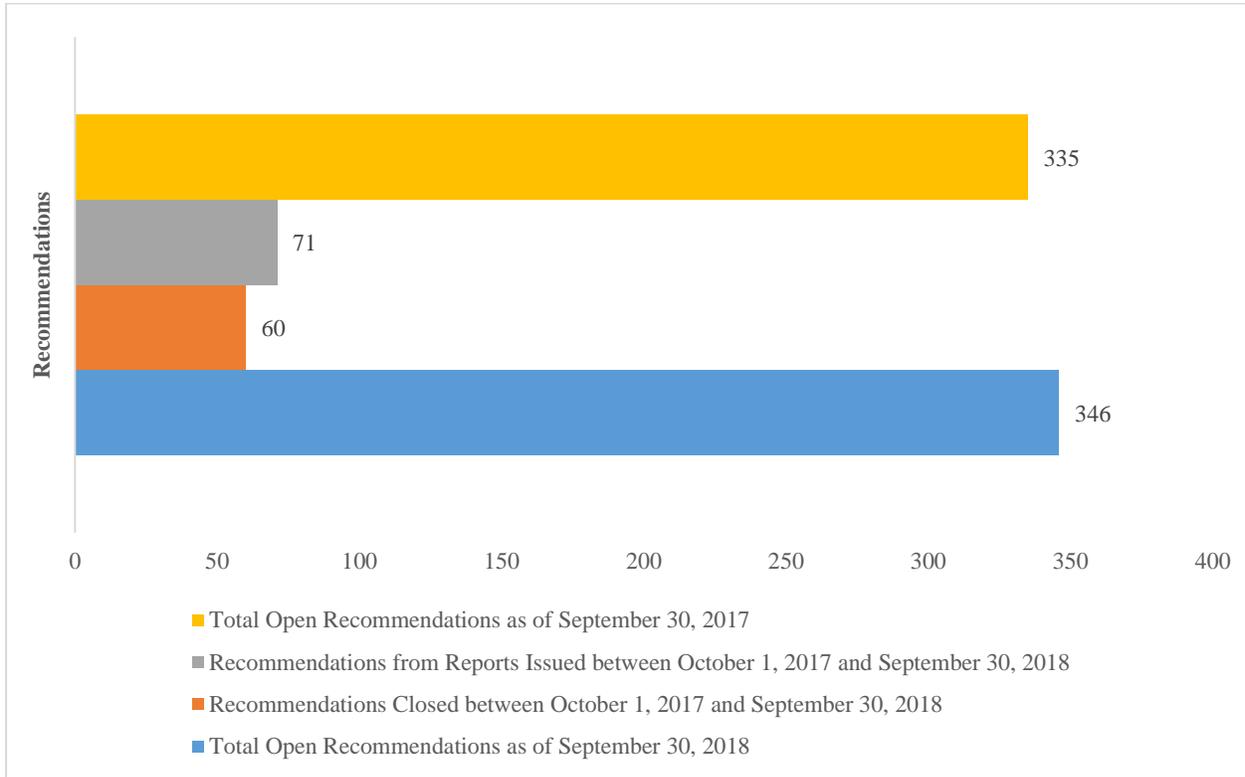*Figure 1. Number of Open Recommendations by Office*

Figure 2 summarizes the number of recommendations opened and closed by NARA OIG since September 30, 2017.

Figure 2. Number of Open Recommendations

As of September 30, 2018, there were 346 open recommendations, aging between less than one old to eleven years old (see Figure 3).

Figure 3. Number of Open Recommendations as of September 30, 2018
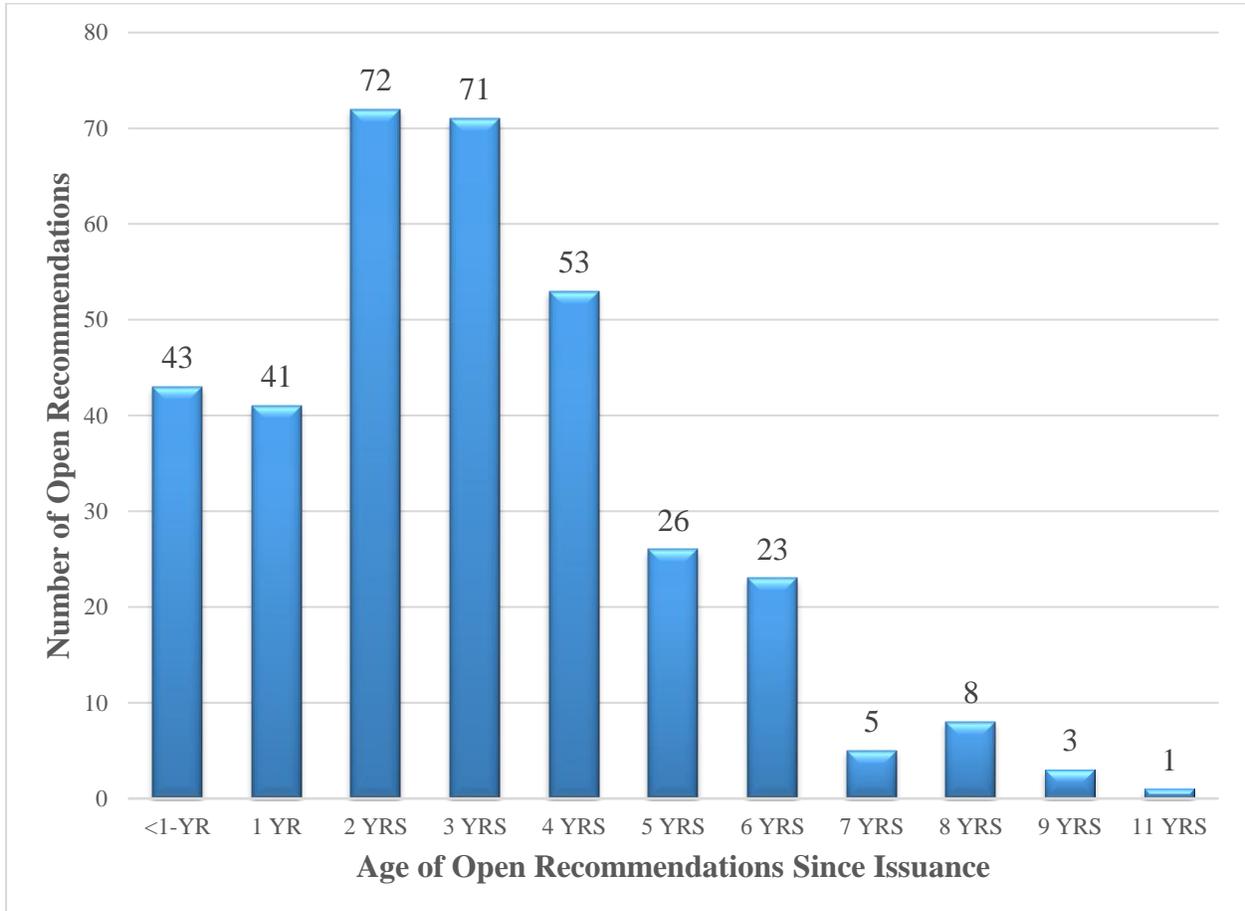
Open Recommendations as of September 30, 2018

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
Audit of NARA's Purchase Card Program (08-02)					
13	The Assistant Archivist of Administration should direct the Director NAA to establish written policies and procedures to evaluate the effectiveness of cardholder reconciliations and approving officials' certifying duties.	CFO	11/14/2007	2/20/2008	3875	Current Audit
Audit of NARA's Work at Home System (09-15)					
7	The CIO ensures that the WAHS meets OMB and NIST requirements prior to full implementation.	Information Services	9/29/2009	6/1/2010	3043	12/31/2018
Audit of NARA's Oversight of Electronic Records Management in the Federal Government (10-04)					
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	4/2/2010	12/31/2016	638	Current Audit
7	The Assistant Archivist for Records Services, Washington DC (NW) should ensure development and application of a methodology for adequately identifying gaps in electronic record accessions. This methodology should reasonably ensure permanent electronic records are identified, scheduled, and ultimately obtained by NARA.	Research Services	4/2/2010	12/31/2016	638	Current Audit

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	Network and Penetration Testing Oversight (11-02)					
1	NARA management apply the appropriate hot fix referenced in the vendor advisory on the affected machines.	Information Services	11/8/2010	3/31/2011	2740	12/31/2018
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	11/8/2010	2/28/2011	2771	12/31/2018
2c	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	11/8/2010	6/15/2011	2664	10/15/2018
3a	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	11/8/2010	3/31/2011	2740	12/31/2018
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	11/8/2010	3/21/2011	2750	11/30/2018
3d	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	11/8/2010	3/31/2011	2740	12/31/2018
6a	NARA management should immediately address corrective action for all vulnerabilities identified as "high" and "critical" risk.	Information Services	11/8/2010	3/31/2011	2740	12/31/2018

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
6b	NARA Management should evaluate the identified risks and corrective actions to address those identified as "medium" and "low" risk vulnerabilities.	Information Services	11/8/2010	6/15/2011	2664	12/31/2018
Audit of NARA's Drug Testing Program (11-15)						
2	Amend NARA TDPs to ensure compliance with the SAMHSA's Interagency Coordinating Group Executive Committee Guidelines for the Selection of Testing Designated Positions and establish a mechanism to periodically review and update TDPs as necessary.	Human Capital	7/7/2011	4/30/2012	2344	9/30/2018
4	Develop a retention plan for all drug testing-related documentation consistent with the guidance issued by SAMHSA.	Human Capital	7/7/2011	12/31/2011	2465	9/30/2018
5	Review NARA's Drug Free Workplace Plan and update it as necessary. In addition, a plan for periodic reviews and updates of the plan document should be developed.	Human Capital	7/7/2011	12/31/2011	2465	9/30/2018
Audit of NARA's Telework Program (11-20)						
3a	The Executive for Information Systems, CIO, and Executive for Business Support Services should ensure all deferred and failed security tests have been reassessed and the results documented.	Information Services	9/30/2011	12/30/2011	2466	12/31/2018
3e	Review Citrix security configurations for adequacy.	Information Services	9/30/2011	12/30/2011	2465	12/31/2018
Audit of NARA's Data Center Consolidation Initiative (12-09)						

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
1b	The CIO should update the Master System List and/or Enterprise Architecture to incorporate energy usage calculations.	Information Services	5/10/2012	8/31/2012	2221	12/31/2018
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	5/10/2012	11/30/2012	2130	12/31/2018
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	5/10/2012	11/30/2012	2130	12/31/2018
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	5/10/2012	11/30/2012	2130	12/31/2018
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	5/10/2012	11/30/2012	2130	12/31/2018
Follow-up on OIG Audit Report 08-01: Audit of the Process of Safeguarding and Accounting for Presidential Library Artifacts (12-10)						

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
2b	Review and revise current time-guidance policy, as appropriate, for baseline inventories for newly established Presidential libraries.	LPM	9/13/2012	12/31/2013	1734	9/30/2018
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	9/13/2012	12/31/2013	1734	9/30/2018
7b	Policies and procedures for artifacts on long-term loan are re-iterated and disseminated concerning 1) the annual update of loan agreements and 2) requirements for long-term loans including photo requirements. LP should establish time caps on loans or periodically request temporary return of items for condition assessments.	LPM	9/13/2012	5/24/2013	1955	6/30/2019
8a	Update comprehensive set of museum collection management policies and procedures and ensure their development.	LPM	9/13/2012	12/31/2014	1369	12/31/2018
8b	Establish procedures to periodically review and, if necessary, revise said policies and procedures.	LPM	9/13/2012	12/31/2014	1369	6/30/2019
NARANet Network Assessment Oversight (12-11)						
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	8/27/2012	2/28/2014	1675	Not Provided
20	This recommendation contains information about IT deficiencies which, if made public, could endanger	Information Services	8/27/2012	11/30/2013	1765	Not Provided

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	NARA systems. Please contact the OIG if you need further information.					
32	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	8/27/2012	8/15/2013	1872	Not Provided
33	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	8/27/2012	8/15/2013	1872	Not Provided
35	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	8/27/2012	12/15/2013	1750	Not Provided
42	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	8/27/2012	8/15/2013	1872	Not Provided
47	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	8/27/2012	9/30/2013	1826	Not Provided
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.	Information Services	8/27/2012	Unresolved	N/A	N/A

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	Unresolved - The agency did not agree to implement the recommendation.					
Audit of NARA's Classified Systems (12-15)						
1	The Executive for Information Services/CIO (I), in coordination with the Chief Operating Officer (C), should ensure all classified system authorization packages are updated in accordance with NARA policy.	Information Services	7/23/2012	1/31/2013	2068	12/31/2018
2	I, in coordination with C, should establish a timeframe for review and approval of authorization documents.	Information Services	7/23/2012	1/31/2013	2068	12/31/2018
3	I, in coordination with C, should develop a continuous monitoring strategy for classified systems requiring system owners on at least a quarterly basis to assess security controls and inform authorizing officials when changes occur that may impact the security of the system.	Information Services	7/23/2012	1/31/2013	2068	12/31/2018
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	7/23/2012	1/31/2013	2068	12/31/2018
Audit of NARA's Internal Control Program (13-01)						
1e	Risk management responsibilities are included in the performance plans for program and function owners.	CFO	12/10/2012	9/30/2013	1826	TBD
Audit of NARA's Preservation Program (13-08)						

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
1a	The Archivist should ensure an overarching preservation strategy is developed. Additionally, a risk-based approach to holistically assess the agency's preservation needs and design the agency's preservation plan should be implemented.	Research Services	7/9/2013	6/30/2014	1553	TBD
1b	The Archivist should ensure an analysis is conducted of the organizational structure and responsibilities of each office involved in preservation. This should include a determination whether the preservation strategy can be effectively implemented with a decentralized structure, or if one NARA office should have authority over the entire Preservation Program.	Research Services	7/9/2013	3/31/2014	1644	TBD
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	7/9/2013	6/30/2014	1553	TBD
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	7/9/2013	6/30/2014	1553	TBD
3b	Develop a plan to identify the complete universe of textual and non-textual records that require preservation.	Research Services	7/9/2013	3/31/2014	1644	TBD
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	Research Services	7/9/2013	11/29/2013	1766	TBD

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	existing risk assessment data to calculate the backlog for the Washington area Archives.					
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	7/9/2013	11/29/2013	1766	TBD
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	7/9/2013	6/30/2014	1553	TBD
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	7/9/2013	3/31/2014	1644	TBD
5d	The Executive for Research Services should ensure Denver, St. Louis, and Special Media implement HMS to record risk assessments.	Research Services	7/9/2013	9/30/2013	1826	TBD
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	LPM	7/9/2013	11/29/2013	1766	TBD

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	preservation needs and (2) obstacles and risks for not implementing HMS.					
Audit of NARA's Preservation Program (13-10)						
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	7/9/2013	12/31/2013	1734	TBD
1b	The COO should ensure a plan is developed including a timeline for when the archival storage facility reviews will be completed.	COO	7/9/2013	3/31/2014	1644	TBD
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	7/9/2013	3/31/2014	1644	TBD
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	7/9/2013	12/31/2013	1734	TBD
1e	The COO ensures Performance Measurement and Reporting System (PMRS) is updated to accurately reflect percentage of archival holdings in appropriate space.	COO	7/9/2013	12/31/2013	1734	TBD
Audit of the ERA System's Ability to Ingest Records (13-11)						

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
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	9/19/2013	12/31/2014	1369	TBD
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 information should be properly disseminated to Federal agencies.	Research Services	9/19/2013	12/31/2014	1369	TBD
Audit of NARA's Processing of Textual Records (13-14)						
3a	The Executive for Legislative Archives, Presidential Libraries and Museums should analyze the backlogs at the pre-PRA libraries and create processing plans for reducing the backlogs at these libraries on a more accelerated basis.	LPM	9/18/2013	12/1/2014	1399	Current Audit
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	9/18/2013	12/31/2014	1369	Current Audit
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	9/18/2013	3/31/2015	1279	Current Audit
6	The Executive for Legislative Archives, Presidential Libraries and Museums and the Executive for Research Services should ensure a review is performed to validate	Research Services, LPM	9/18/2013	12/31/2014	1369	Current Audit

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	the accuracy of processing data supplied to the Performance and Accountability Office.					
8	The Executive for Legislative Archives, Presidential Libraries and Museums should ensure procedures for all Presidential libraries are documented, and review existing procedures and update them as necessary.	LPM	9/18/2013	12/31/2014	1369	Current Audit
Audit of Select Aspects of NARA's Sustainability Program: Energy Savings Performance Contracts (14-01)						
8	NARA should establish formal assessment criteria and future savings analysis for use in determining whether to cancel ESPCs.	CFO	1/30/2014	9/30/2015	1098	3/31/2019
Audit of NARA's Procurement Activity within the Field Offices (14-05)						
3	NARA should establish and implement a formal documented process for informing the field office support team of field office contracts requiring review prior to award.	CAO	3/11/2014	12/31/2014	1369	12/31/2018
4	Update NARA policies to ensure the guidance for approval of small and small disadvantaged business utilization exceptions is consistent.	CAO	3/11/2014	12/31/2014	1369	12/31/2018
Audit of NARA's CPIC Process (14-08)						
1b	The CIO should ensure all required CPIC related documentation is completed for all NARA IT investments going through the CPIC process.	Information Services	4/17/2014	2/27/2015	1311	6/28/2019
1c	The CIO should require the creation and use of a checklist outlining the IT governance related	Information Services	4/17/2014	6/30/2015	1188	12/31/2018

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	documentation required to be completed for all IT investments going through the CPIC process.					
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	4/17/2014	6/30/2015	1188	12/31/2018
3	The Chief Operating Officer (COO) should ensure NARA IT investments do not bypass NARA's CPIC process.	Information Services	4/17/2014	6/30/2015	1188	Not Provided
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	4/17/2014	8/31/2015	1126	12/31/2018
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	4/17/2014	8/31/2015	1126	Not Provided
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	4/17/2014	6/30/2015	1188	12/31/2018
Audit of Conference-Related Activities and Expenses (14-09)						
2a	The Chief Financial Officer (CFO) should ensure communication is provided to offices regarding adherence to conference policies, including penalties for non-compliance.	CFO	5/1/2014	6/30/2015	1188	3/31/2019

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
2b	The CFO should ensure interim guidance 165-1, Conference-Related Activities and Expenses, is updated to incorporate statutory requirements for reporting to the OIG any conferences where expenses exceed $20,000.	CFO	5/1/2014	6/30/2015	1188	3/31/2019
2c	The CFO should ensure methodology is developed for gathering and reporting post-conference details, including details of all expenses and justification when total costs increase by a threshold established by management. This should include a time frame for reporting.	CFO	5/1/2014	6/30/2015	1188	3/31/2019
Oversight of the Audit of Enterprise Wireless Access (14-10)						
1d	NARA should assess the security controls using appropriate assessment procedures to determine the extent to which the controls are implemented correctly, operating as intended, and producing the desired outcome with respect to meeting the security requirements.	Information Services	5/9/2014	12/31/2014	1369	3/31/2019
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	5/9/2014	12/31/2014	1369	3/31/2019
3	NARA should develop, document, review, update, and implement wireless policies and procedures on at least an annual basis in accordance with internal NARA and NIST requirements.	Information Services	5/9/2014	12/31/2014	1369	3/31/2019
4a	NARA should utilize existing WLC and WAP baseline configurations or develop its own baseline configurations.	Information Services	5/9/2014	10/29/2014	1432	3/31/2019

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
4b	NARA should implement a process to monitor the WLC and WAP settings for compliance with the established baseline configurations.	Information Services	5/9/2014	10/29/2014	1432	3/31/2019
4c	NARA should document and approve any deviations from the WLC and WAP baseline configurations.	Information Services	5/9/2014	10/29/2014	1432	3/31/2019
4d	NARA should maintain older versions of the baseline configurations as necessary.	Information Services	5/9/2014	12/31/2014	1369	3/31/2019
5a	NARA should implement a process to conduct vulnerability scans that identify weaknesses related to NARA's wireless environment.	Information Services	5/9/2014	12/31/2014	1369	3/31/2019
5b	NARA should develop procedures to analyze and remediate the vulnerabilities identified.	Information Services	5/9/2014	12/31/2014	1369	3/31/2019
Audit of Special Telework Arrangements at NARA (14-11)						
2	The CHCO should provide clarifying guidance to supervisors as to which arrangements require executive or staff director approval.	Human Capital	5/5/2014	12/31/2014	1369	12/31/2018
3	The CHCO should establish an oversight mechanism to ensure employees' duty station assignments are reviewed and validated periodically.	Human Capital	5/5/2014	12/31/2014	1369	12/31/2018
5	The CHCO should issue additional guidance for long-distance telework arrangements to require supervisors to conduct a cost/benefit analysis of the proposed arrangement and document this analysis. For those arrangements resulting in additional costs to NARA, supervisors should be required to justify how the arrangement is in the best interest of NARA.	Human Capital	5/5/2014	12/31/2014	1369	12/31/2018

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	Funds Put to Better Use - $59,631					
8	The CHCO should revise the Telework Agreement (form 3040) or issue additional guidance for full-time and long-distance telework to require supervisors and employees to estimate the timeframe for the arrangement, while still subject to the annual renewal.	Human Capital	5/5/2014	12/31/2014	1369	12/31/2018
9	The CHCO should revise NARA 332 to include a requirement that new telework agreements be prepared and signed when a new employee/supervisory relationship is established.	Human Capital	5/5/2014	12/31/2014	1369	12/31/2018
11	The CHCO should communicate best practices for monitoring telework employees and best practices in establishing special telework arrangements across the agency.	Human Capital	5/5/2014	12/31/2014	1369	12/31/2018
FY2013 OIG FISMA Evaluation (15-01)						
2	Coordinate with the Office of Performance and Accountability and the NARA's Chief Risk Officer to identify, assess, capture, and report IT Security controls within NARA's Internal Control Program Tool in order to adequately ensure safeguarding of assets.	Information Services	10/24/2014	7/31/2015	1157	9/30/2018
Audit of NARA's Mobile Device Management (15-02)						
1a	Develop and document a strong internal control process for ordering, activating, and deactivating mobile devices and phone lines to ensure no unnecessary phone lines exist and incur costs.	Information Services	11/12/2014	4/30/2015	1249	3/31/2019

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	Funds Put to Better Use - $7,289					
1b	Develop and document a strong internal control process for reviewing monthly bills for items including user names, activities, plan adequacy, and opportunity for cost savings.	Information Services	11/12/2014	4/30/2015	1249	3/31/2019
1c	Develop and document a strong internal control process for determining when an additional charge will be considered for reimbursement. *Funds Put to Better Use - $2,745*	Information Services	11/12/2014	4/30/2015	1249	3/31/2019
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	11/12/2014	4/30/2015	1249	3/31/2019
3	Provide training to educate users on acceptable uses of NARA-issued mobile devices, including requesting a travel device for international travel.	Information Services	11/12/2014	8/31/2015	1126	2/28/2019
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	11/12/2014	4/30/2015	1249	7/31/2019
Audit of Specially Protected Records (15-03)						
2a	Security Management performs initial certifications of Specially Protected Holdings (SPHs) storage areas.	COO	2/6/2015	7/31/2017	426	TBD

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2b	Security Management performs security inspections of SPHs storage areas.	COO	2/6/2015	7/31/2017	426	TBD
2c	Security Management develops guidelines for SPHs security inspections, including timeframes, criteria, documenting requirements, and reporting requirements.	COO	2/6/2015	7/31/2017	426	TBD
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	2/6/2015	7/31/2017	426	TBD
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	2/6/2015	9/28/2018	2	Research Services - TBD

LPM - 3/31/2019 |
| 5b | Ensure inventory listings are reviewed to determine their accuracy and update as necessary. | Research Services, LPM | 2/6/2015 | 9/28/2018 | 2 | Research Services - TBD

LPM - 3/31/2019 |
| 5c | Ensure a finding aid is created for the agency's entire SPHs collection at the item level. | Research Services, LPM | 2/6/2015 | 9/28/2018 | 2 | Research Services - TBD

LPM - 3/31/2019 |

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
5d	Ensure locked hard copies of the inventory listings are maintained.	Research Services, LPM	2/6/2015	9/28/2018	2	Research Services - TBD LPM - 3/31/2019
5e	Ensure SPHs inventory listings are maintained in the Holdings Management System (HMS). 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	2/6/2015	9/28/2018	2	Research Services - TBD LPM - 3/31/2019
7	Ensure all Presidential Libraries are in compliance with NARA 1572 policy of conducting annual inspections.	LPM	2/6/2015	8/31/2017	395	8/31/2019
8a	Initial inspections of SPHs inventory are completed.	Research Services, LPM	2/6/2015	8/31/2017	395	Research Services - TBD LPM - 3/31/2019
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	2/6/2015	8/31/2017	395	Research Services - TBD LPM - 8/31/2019
8c	Annual inspection reports include at a minimum date of inspection, individuals that complete the inspections, and	Research Services, LPM	2/6/2015	8/31/2017	395	Research Services - TBD

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	a listing of items inspected, including their location and physical condition.					LPM - 8/31/2019
8d	Annual inspection results are adequately documented and communicated to Security Management and office heads.	Research Services, LPM	2/6/2015	8/31/2017	395	Research Services - TBD LPM - 8/31/2019
9a	Staff is properly trained or retrained to use charge out cards whenever records are removed from SPHs storage areas.	LPM	2/6/2015	7/31/2017	426	9/30/2018
10a	Required elements for the handling of SPHs for each record storage area should be communicated to each custodial unit.	Research Services, LPM	2/6/2015	7/31/2017	426	7/31/2019
10b	Detailed procedures are documented for each custodial unit.	Research Services, LPM	2/6/2015	7/31/2017	426	8/1/2019
10c	A process is in place for periodic review of procedures and updates are made as needed.	Research Services, LPM	2/6/2015	7/31/2017	426	8/2/2019
	Audit of NARA's Digitization Partnerships (15-10)					
1	Conduct an agency-wide inventory of Digitization Partnerships and update NARA's partnership webpage to reflect current partners.	Innovation	3/30/2015	3/30/2016	914	12/31/2018
2	Establish criteria for which Digitization Partnerships require public notification and approval by the Archivist of the United States.	Innovation	3/30/2015	12/31/2015	1004	12/31/2018

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
8	Establish a process that ensures NARA's Digitization Partnership Strategy, Principles for Partnerships, and digitization policy are reviewed and updated on a regular and timely basis.	Innovation	3/30/2015	12/31/2015	1004	12/31/2018
Audit of Digitization Storage (15-11)						
6	Develop a long-term strategy for increasing transfer capabilities between various internal storage systems housing digitized records.	Information Services	5/5/2015	12/31/2015	1004	12/31/2018
Audit of NARA's Human Resource (HR) Systems and Data Accuracy (15-13)						
1	Fully implement the new supervisor information update process in FPPS and conduct a review of the information on a periodic basis to ensure the information remains accurate and complete.	Human Capital	8/24/2015	7/31/2016	791	9/30/2018
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	8/24/2015	6/30/2016	822	TBD
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	8/24/2015	9/30/2016	730	12/31/2018
Audit of NARA's Space Management (15-14)						
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	9/29/2015	10/31/2016	699	9/30/2018

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5	Develop a long-term space management strategy for the agency.	COO	9/29/2015	6/30/2017	457	9/30/2018
6	Develop cost estimates for potential solutions.	COO	9/29/2015	9/30/2017	365	9/30/2018
7	Incorporate space management into NARA's strategic planning initiatives and include the agency's space need in all necessary reporting. Considering reporting space management as a Material Weaknesses and track it appropriately.	COO	9/29/2015	9/30/2017	365	9/30/2018
8	Create a timeline for the agency to have necessary discussions with both internal and external stakeholders to address NARA's space challenges.	COO	9/29/2015	9/30/2017	365	9/30/2018
9	Develop requirements necessary for NARA to prepare a budget request to address the agency's critical space challenges. After a strategy is implemented and requirements are developed, prepare and submit a budget request.	COO	9/29/2015	12/31/2017	273	9/30/2018
	Oversight of NARA's Cable Infrastructure Assessment (15-15)					
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	9/30/2015	6/30/16	822	TBD
2.1	Ensure that neat cable management and labeling mechanisms are employed for all sites.	Information Services	9/30/2015	8/31/2016	760	TBD
2.2	Ensure that all server rooms are equipped with appropriate fire detection and suppression capabilities.	Business Support Services	9/30/2015	10/31/2016	699	3/30/2019

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2.3	Limit access to all server rooms to those individuals with an explicit need to access IT equipment.	Business Support Services	9/30/2015	10/31/2016	699	3/30/2019
2.4	Ensure that appropriate temperature and humidity monitoring and control mechanisms are employed for all server rooms.	Business Support Services	9/30/2015	10/31/2016	699	3/30/2019
2.5	Ensure that appropriate UPS devices are employed for hardware supporting the site's network infrastructure.	Business Support Services	9/30/2015	10/31/2016	699	9/30/2018
2.6	Ensure that all server racks, switches, and network equipment are adequately secured from unauthorized access via locked racks.	Information Services	9/30/2015	4/26/2016	887	TBD
3	NARA should develop and implement a plan to install additional networking capabilities at facilities that are near capacity, or develop and implement a contingency plan to support continued operations in the event that networking capabilities are maximized.	Information Services	9/30/2015	5/31/2016	852	TBD
Audit of NARA Web Hosting (16-01)						
1	The Chief Operating Officer (COO) should coordinate with the Chief Innovation Officer (CINO) to clearly define a business owner for the public facing website process.	Innovation	10/19/2015	12/31/2018	-92	12/31/2018
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	10/19/2015	12/31/2018	-92	12/31/2018

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
3	The CIO and CINO should clearly define the roles and responsibilities throughout the process developed in recommendation #2.	Innovation	10/19/2015	12/31/2018	-92	12/31/2018
5	The CIO and NGC should review and document the approval of all agreements for web hosting services.	Information Services	10/19/2015	12/31/2018	-92	6/30/2019
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	10/19/2015	6/30/2017	457	6/30/2019
7	The CIO should coordinate with the CINO to make the web hosting environment FISMA compliant.	Information Services	10/19/2015	6/30/2017	457	6/30/2019
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.	COO	10/19/2015	6/30/2017	457	12/31/2018
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	10/19/2015	6/30/2017	457	6/30/2019
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	10/19/2015	6/30/2017	457	6/30/2019
13	The CIO should require an IT security assessment be performed prior to NARA initiating a web hosting agreement.	Information Services	10/19/2015	6/30/2017	457	6/30/2019

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
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	10/19/2015	6/30/2017	457	6/30/2019
15	The CIO should ensure Information Services personnel document their review of the IT security assessments.	Information Services	10/19/2015	6/30/2017	457	6/30/2019
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	10/19/2015	8/31/2017	395	6/30/2019
17	Develop a process for managing access to shared user accounts.	Information Services	10/19/2015	8/31/2017	395	6/30/2019
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	10/19/2015	6/30/2017	457	6/30/2019
24	Apply the baseline configuration to the web servers.	Information Services	10/19/2015	6/30/2017	457	6/30/2019
25	Coordinate with Innovation to configure the WebStage server to mirror the production web servers.	Information Services	10/19/2015	6/30/2017	457	6/30/2019
26	The CIO should require all systems develop a baseline configuration document and have it approved before it is applied to the entire system.	Information Services	10/19/2015	6/30/2017	457	6/30/2019

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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	10/19/2015	6/30/2017	457	6/30/2019
29	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	10/19/2015	6/30/2017	457	6/30/2019
30	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	10/19/2015	6/30/2017	457	6/30/2019
	Oversight of FY2015 FISMA Assessment (16-02)					
1	For systems utilized by NARA and managed by Cloud Service Providers, NARA should develop and implement formalized 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.	Information Services	1/16/2016	3/31/2017	548	Current Audit
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	1/16/2016	3/31/2017	548	Current Audit

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
3	NARA should configure RRS application password settings in accordance with NARA policy.	Information Services	1/16/2016	3/31/2017	548	Current Audit
4	NARA should develop, update and implement formalized access control policies and procedures for the B&A, RRS, SCTS and DCU systems.	Information Services	1/16/2016	5/31/2017	487	Current Audit
5	NARA should implement and document user access reviews for B&A, ENOS/HMS, RRS, SCTS, and DCU.	Information Services	1/16/2016	3/31/2017	548	Current Audit
6	NARA should develop and implement procedures to reissue shared/group account credentials when individuals are removed from B&A and RRS user groups.	Information Services	1/16/2016	6/30/2017	457	Current Audit
8	NARA should develop, update and implement formalized VPN access policies and procedures to ensure individuals are granted appropriated access.	Information Services	1/16/2016	3/31/2017	548	Current Audit
9	NARA should establish and implement a formal process to create, assign, track, and remediate identified weaknesses in accordance with NARA-established requirements to: · Ensure milestone dates are updated as needed if targeted dates are expected to be missed or are overdue, while still documenting original targeted completion dates. · Investigate and complete actions and milestones to close out overdue POA&M items, specifically items with a medium risk level or higher.	Information Services	1/16/2016	5/31/2017	487	Current Audit

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
11	NARA should implement improved processes to continuously identify and 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	1/16/2016	3/31/2017	548	Current Audit
13	For future agreements, NARA should: · require that providers of external information system services comply with NARA information security requirements. · define and document government oversight and user roles and responsibilities with regard to external information systems, and · establish a process to monitor security control compliance by external service providers on an ongoing basis.	Information Services	1/16/2016	5/31/2017	487	Current Audit
14	NARA should add an addendum to current agreements which requires compliance with NARA's information security requirements.	Information Services	1/16/2016	6/30/2017	457	Current Audit
16	NARA should develop contingency plans and disaster recovery plans for SCTS and B&A, and any other systems identified as critical.	Information Services	1/16/2016	3/30/2017	549	Current Audit
17	NARA should review and update the RRS, NARA COOP/Disaster Recovery Infrastructure Specification and Rocket Center Network Design document, and DCU contingency plans and disaster recovery plans as	Information Services	1/16/2016	8/31/2017	395	Current Audit

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	necessary, and institute procedures to ensure annual reviews and updates of these documents for these systems and any other systems identified as critical.					
18	NARA should test the B&A, ENOS/HMS, RRS, DCU and SCTS system contingency plans for these and any other systems identified as critical once these documents have been developed and updated; and test tape backup information to verify media reliability and information integrity on a regular basis.	Information Services	1/16/2016	5/31/2017	487	Current Audit
19	NARA should establish and document a detailed process to perform a comprehensive annual information system component inventory count.	Information Services	1/16/2016	3/31/2017	548	Current Audit
20	NARA should implement the following corrective actions: · complete efforts to implement the Net IQ Sentinel product · 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&A, ENOS-HMS and DCU systems that may indicate potential security violations · 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.	Information Services	1/16/2016	3/31/2017	548	Current Audit

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	Audit of NARA's Public Facing Websites (16-05)					
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. Specifically, we recommend the CINO 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	3/25/2016	12/31/2018	-92	12/31/2018
1b	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CINO coordinate with the CIO to ensure all publicly-accessible websites are compliant with NIST SP 800-53 revision 4.	Innovation	3/25/2016	12/31/2020	-823	12/31/2020
1c	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CIO regularly (at least quarterly) conducts a comprehensive web vulnerability scan on all NARA publicly-accessible websites.	Information Services	3/25/2016	12/31/2016	638	6/30/2019
1d	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CIO documents the process conducting a web vulnerability scan on all publicly-accessible websites.	Information Services	3/25/2016	12/30/2016	639	6/30/2019
1e	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites.	Information Services	3/25/2016	3/31/2017	548	6/30/2019

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	Specifically, we recommend the CIO provides the necessary training to IT Security personnel to be able to review and interpret the vulnerability scanner results.					
1f	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CIO prevents users from saving their credentials in web browsers.	Innovation	3/25/2016	3/31/2017	548	12/31/2018
1g	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CIO requires all NARA publicly-accessible websites to apply NARA's password configuration requirements.	Information Services	3/25/2016	3/31/2017	548	6/30/2019
1h	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CIO requires all publicly-accessible websites to only send cryptographically protected user credentials.	Information Services	3/25/2016	3/31/2017	548	6/30/2019
1i	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CIO requires users to change their passwords after a website password reset.	Information Services	3/25/2016	3/31/2017	548	6/30/2019
1j	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CIO analyzes all	Information Services	3/25/2016	2/28/2017	579	6/30/2019

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	publicly-accessible websites to determine if they are vulnerable to all variations of cross-site scripting including reflected.					
1k	The CINO should coordinate with the CIO to improve NARA's management and internal controls surrounding the security of NARA's publicly-accessible websites. Specifically, we recommend the CINO coordinates with the CIO to review all publicly-accessible websites for any potential information that could affect NARA's IT security posture.	Information Services	3/25/2016	3/31/2017	548	6/30/2019
3	The CIO should implement secure HTTPS configurations for all publicly-accessible websites.	Information Services	3/25/2016	3/31/2017	548	6/30/2019
4	The CIO should regularly scan (at least quarterly) all publicly-accessible websites to determine if HTTPS is securely configured.	Information Services	3/25/2016	5/31/2017	487	6/30/2019
5	The CIO should document a process to review all security assessments by a qualified official.	Information Services	3/25/2016	2/28/2017	579	6/30/2019
6	The CIO should ensure Information Services personnel review all cloud hosting security assessments.	Information Services	3/25/2016	2/28/2017	579	6/30/2019
7	The CIO should ensure Information Services personnel document their review of the IT security assessments.	Information Services	3/25/2016	2/28/2017	579	6/30/2019
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)						
3	The Executive for Agency Services should develop a plan to eliminate the backlog at each FRC Create standardized FRC policies and procedures to process IRS records to meet timeframe requirements and accurately	Agency Services	5/17/2016	9/30/2017	365	12/31/2018

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	report IRS refile times and volumes to include enhancing controls to review all reports prior to sending to the IRS.					
5	The Executive for Agency Services should establish standardized procedures for verifying batch volumes.	Agency Services	5/17/2016	3/31/2017	548	8/1/2018
7	The Executive for Agency Services should update the batch signoff process requiring employees to attest every item included in a batch was properly refiled or interfiled.	Agency Services	5/17/2016	6/30/2017	457	9/30/2018
8	The Executive for Agency Services should implement consistent unique batch numbering processes at the FRCs.	Agency Services	5/17/2016	10/31/2016	699	9/30/2018
9	The Executive for Agency Services should implement standard IRS document locators at the FRCs.	Agency Services	5/17/2016	12/31/2017	273	3/31/2019
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, refiling, and quality control review of records. A mechanism for tracking errors identified by employee	Agency Services	5/17/2016	9/30/2017	365	3/31/2019

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	and 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	5/17/2016	12/31/2017	273	6/30/2019
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	5/17/2016	6/30/2017	457	12/31/2018
13	The Executive for Agency Services should implement a mechanism (database, etc.) to facilitate the problem tracking and resolution process.	Agency Services	5/17/2016	6/30/2017	457	12/31/2018
	Oversight of Enterprise-Wide Risk Assessment (17-AUD-01)					
1a	The Chief Operating Officer/Chief Risk Officer should fully implement all components of NARA 160, including developing, documenting, and fully implementing NARA 162, *NARA's Enterprise Risk Management Program*. Within NARA 162, roles and responsibilities for ERM activities should be clearly identified.	CFO	10/28/2016	9/29/2017	366	6/30/2019
1b	The Chief Operating Officer/Chief Risk Officer should fully implement all components of NARA 160, including developing, documenting, and fully implementing NARA 163, *NARA's Issues Management*.	CFO	10/28/2016	9/29/2017	366	6/30/2019

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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 directly to NARA's strategic plan and mission and prioritized based on their overall importance to the agency.	CFO	10/28/2016	9/29/2017	366	6/30/2019
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	10/28/2016	9/29/2017	366	6/30/2019
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	10/28/2016	9/29/2017	366	6/30/2019
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	CFO	10/28/2016	9/29/2017	366	6/30/2019

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	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 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	10/28/2016	9/29/2017	366	6/30/2019
Audit of NARA's System Inventory (17-AUD-02)
1	The CIO should develop, document, approve and implement a process for developing and maintaining the system inventory, in adherence to 44 U.S.C. § 3505(c).	Information Services	11/4/2016	5/1/2017	517	1/31/2019
2	The CIO should ensure all of the systems managed by NARA and its contractors are included in the inventory.	Information Services	11/4/2016	8/30/2017	396	2/28/2019
3	The CIO should update the inventory annually to ensure the information populated in the inventory is complete and accurate.	Information Services	11/4/2016	5/1/2017	517	2/28/2019

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
4	The CIO should document in NARA Directive 101 the organization responsible for maintaining the system inventory.	Information Services	11/4/2016	8/31/2017	395	2/28/2019
5	The CIO should comply with FIPS 199 and NIST SP 800-60 to ensure all information systems are categorized.	Information Services	11/4/2016	9/30/2017	365	12/31/2018
6	The CIO should comply with FIPS 199 and NIST SP 800-60 to ensure the categorization of information systems is accurate.	Information Services	11/4/2016	9/30/2017	365	12/31/2018
7	The CIO should update the FIPS 199 guidance to include all information types listed in NIST SP 800-60 Volume II.	Information Services	11/4/2016	9/30/2017	365	12/31/2018
8	The CIO should coordinate with system owners on validating their current FIPS 199 to ensure the systems categorization level is accurate.	Information Services	11/4/2016	12/30/2016	639	12/31/2018
Audit of NARA's Compliance with the Federal Managers Financial Integrity Act for FY15 (17-AUD-03)						
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	11/4/2016	9/29/2017	366	6/30/2019
4	The Archivist should ensure the MCOC tracks and manages all high-level risks.	CFO	11/4/2016	9/29/2017	366	6/30/2019
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	11/4/2016	9/29/2017	366	6/30/2019

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
6a	NARA Executives should ensure monitoring and testing plans are sufficiently reported in the ICP Tool.	CFO	11/4/2016	9/29/2017	366	6/30/2019
6b	NARA Executives should ensure results of monitoring and testing plans are achievable within the reporting timeframe. *Unresolved - The agency did not agree to implement the recommendation.*	CFO	11/4/2016	Unresolved	N/A	N/A
6c	NARA Executives ensure all information is up-to-date and reflects the current control environment.	CFO	11/4/2016	9/29/2017	366	6/30/2019
7	NARA Executives should identify, develop, and include in ICP reports measurable indicators to evaluate functions.	CFO	11/4/2016	9/29/2017	366	6/30/2019
8	NARA Executives should update NARA Directive 101 to include internal control responsibilities for each office. *Unresolved - The agency did not agree to implement the recommendation.*	CFO	11/4/2016	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	11/4/2016	9/29/2017	366	6/30/2019
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	11/4/2016	10/31/2017	334	6/30/2019

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	Audit of NARA's Management Control over Access Applications (17-AUD-04)					
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	11/18/2016	12/31/2017	273	12/31/2018
3	The CIO should, in conjunction with each program office, develop and implement a comprehensive, systematic process to determine when a MS Access application or database should be recognized as an IT system.	Information Services	11/18/2016	6/30/2017	457	12/31/2018
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	11/18/2016	12/31/2017	273	11/30/2018
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	11/18/2016	4/30/2017	518	12/31/2018
	Audit of NARA's Procurement Program (17-AUD-06)					
3	The Chief Acquisition Officer (CAO) should formally appoint a Senior Procurement Executive (SPE) and procurement officials who are authorized to approve	CAO	11/15/2016	5/14/2017	504	12/31/2018

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	warrants over $100,000,000 and approve warrant for construction and architectural-engineering services contracting officers.					
4	Competition Advocate, in collaborations with the CAO, should complete an evaluation and report on the overall strength of NARA's competition practice in accordance with the Federal Acquisition Regulations (FAR) and OMB guidance.	Business Support Services	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
6	The CAO should develop and implement procedures to ensure contracting offices in Acquisitions Branch (BCN) and Space Planning and Projects Branch (BFS) report all contract related activity to the SPE.	CAO	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
9	The CAO should develop and implement procedures to ensure contracts are evaluated to identify contracts that	CAO	11/15/2016	5/14/2017	504	12/31/2018

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	are wasteful, inefficient, or unlikely to meet NARA needs.					
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, *Conducting Acquisition Assessments*.	CAO	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
16	The CAO should ensure NARA 501 NARA Procurement policy include guidance to program offices on their responsibilities in the procurement process.	CAO	11/15/2016	5/14/2017	504	12/31/2018
17	The CAO should ensure program offices are routinely trained in NARA procurement policy and procedures,	CAO	11/15/2016	5/14/2017	504	12/31/2018

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	specifically procurements requisition packages and procurement lead times.					
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	11/15/2016	5/14/2017	504	12/31/2018
19	The CAO should develop a process to monitor the close-out of contracts process to ensure contracts are closed in a timely manner and identify reasons contracts are not closed out in a timely manner.	CAO	11/15/2016	5/14/2017	504	12/31/2018
20	The Acquisition Career Manager (ACM) should verify all contracting officers, contracting officer representatives, program and project managers, and other contracting professionals set up an account in Federal Acquisition Institute Training Application System for tracking certifications and continuous training.	CAO	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
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	11/15/2016	5/14/2017	504	12/31/2018
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	CAO	11/15/2016	5/14/2017	504	12/31/2018

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	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.					
26	The CAO should ensure there is more IT training for CO's that do a significant amount of work in IT in accordance with OMB technology acquisition cadre guidance.	CAO	11/15/2016	5/14/2017	504	12/31/2018
	Audit of NARA's Compliance with HSPD-12 (17-AUD-07)					
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	2/19/2017	12/29/2017	275	Not Provided
3	Chief of Management and Administration or designee should use existing budgetary resources to fully implement HSPD-12.	Information Services	2/19/2017	12/29/2017	275	Not Provided
4	Chief of Chief of Management and Administration or designee should establish a reasonable date to fully implement HSPD-12.	Information Services	2/19/2017	12/29/2017	275	Not Provided
	Audit of NARA's Adoption and Management of Cloud Computing Activities (17-AUD-08)					

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
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	3/15/2017	12/29/2017	275	3/31/2019
2	The CIO should complete and document a review of existing IT systems for cloud compatibility.	Information Services	3/15/2017	12/29/2017	275	3/31/2019
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	3/15/2017	12/29/2017	275	3/31/2019
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	3/15/2017	12/29/2017	275	3/31/2019
5	The CIO should develop, approve, and implement written NARA-wide standards for the early identification and designation of cloud computing services, and consistently communicate the standard to those who need it.	Information Services	3/15/2017	12/29/2017	275	3/31/2019
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	3/15/2017	12/29/2017	275	3/31/2019
7	The CIO should coordinate with necessary business areas including Acquisitions and General Counsel to develop,	Information Services	3/15/2017	12/29/2017	275	3/31/2019

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	approve, and implement its written cloud provisioning guidelines.					
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	3/15/2017	12/29/2017	275	3/31/2019
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	3/15/2017	12/29/2017	275	3/31/2019
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	3/15/2017	6/30/2018	92	3/31/2019
	Audit of NARA's Online Access to Digitized Holdings (17-AUD-12)					
2	The Chief Innovation Officer and Chief Information Officer develop long-term cost estimates for the continued storage of digitized holdings in the NAC.	Innovation	6/19/2017	11/30/2018	-61	No Change
4	The Chief Innovation Officer and Chief Information Officer implement solution to delete duplicate copies of digitized holdings to realize cost savings.	Innovation	6/19/2017	10/31/2018	-31	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	Funds Put to Better Use - $10,000					
5	The Chief Innovation Officer and Chief Information Officer develop a strategy to optimize the use of NARA's Cloud infrastructure as it pertains to providing online access to NARA's digitized holdings.	Innovation	6/19/2017	12/31/2018	-92	3/31/2019
	Audit of NARA's FOIA Program (17-AUD-16)					
1	Implement effective internal controls over funds collected include proper segregation of duties and managerial reviews at all components including AFN-M.	NGC	9/27/2017	12/31/2017	273	12/31/2018
2	Ensure effective and systematic quality control system for components tasked with processing FOIA request to include periodic monitoring.	NGC	9/27/2017	10/31/2018	-31	12/31/2018
3	Establish and document clear responsibilities for managing and overseeing the agency's FOIA program.	NGC	9/27/2017	12/31/2018	-92	No Change
4	Finalize the agency-wide internal review and needs analysis of the FOIA program to identify all vulnerabilities and resource needs to effectively manage the FOIA program. If needed seek authority to acquire additional resources needed to improve the timeliness of FOIA responses.	NGC	9/27/2017	12/31/2018	-92	No Change
5	Based on the needs analysis, develop a corrective action plan and strategies for effectively reducing FOIA processing delays and the backlog of FOIA requests.	NGC	9/27/2017	12/31/2018	-92	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
6	Establish controls for periodic reviews of the corrective action plan to ensure that the plan is effective and is working as intended.	NGC	9/27/2017	12/31/2018	-92	No Change
8	Implement time management tracking mechanism or processes that could clearly document and report NARA's annual FOIA cost related to FTEs.	NGC	9/27/2017	10/31/2018	-31	12/31/2018
9	Utilize updated processing mechanisms or processes to increase the efficiency and effectiveness of the FOIA Program.	NGC	9/27/2017	12/31/2018	-92	No Change
10	Develop an agency wide FOIA technology system or process that would enable coordination between components, provide document management and sharing, and standardized tracking and reporting of FOIA request.	NGC	9/27/2017	12/31/2018	-92	No Change
11	Develop and implement a formal agency-wide FOIA training program.	NGC	9/27/2017	12/31/2018	-92	No Change
13	Require management to certify all employees receive FOIA training.	NGC	9/27/2017	12/31/2018	-92	No Change
15	To the extent necessary, require each NARA component to develop a plan for processing FOIA requests that conforms with and implements the updated FOIA guidelines and ensure periodic updates of FOIA policies and procedures to incorporate any new changes in laws and regulations.	NGC	9/27/2017	12/31/2018	-92	No Change
DATA Act Audit (18-AUD-02)						
1	Monitor and evaluate steps already taken to reduce timing errors between FPDS and Prism.	CFO	11/8/2017	11/30/2017	304	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
2	Review and enhance the process to validate and reconcile data of contract and grant awardees, including demographic data, for all DATA Act files back to the source system on a regular basis and prior to file submission to USA Spending.	CFO	11/8/2017	3/31/2018	183	No Change
FY 2017 Financial Statement Audit Oversight (18-AUD-03)						
1b	The CIO continues to analyze and prioritize remediation efforts to accomplish security and control objectives. Key tasks should include, but are not limited to: Strengthen the review and disabling of user accounts in accordance with NARA's information technology policies and requirements.	Information Services	11/14/2017	5/15/2018	138	Current Audit
1d	The CIO continues to analyze and prioritize remediation efforts to accomplish security and control objectives. Key tasks should include, but are not limited to: Continue to implement improved processes for reviewing and updating key security documentation, including system security plans on an annual basis.	Information Services	11/14/2017	5/15/2018	138	Current Audit
1e	The CIO continues to analyze and prioritize remediation efforts to accomplish security and control objectives. Key tasks should include, but are not limited to: Implement improved processes for creating, updating and remediating plans of actions and milestones.	Information Services	11/14/2017	5/15/2018	138	Current Audit
1f	The CIO continue to analyze and prioritize remediation efforts to accomplish security and control objectives. Key tasks should include, but are not limited to: Implement remediation efforts to address security deficiencies	Information Services	11/14/2017	5/15/2018	138	Current Audit

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	identified during our assessments of NARA's database platforms and network infrastructure.					
1g	The CIO continues to analyze and prioritize remediation efforts to accomplish security and control objectives. Key tasks should include, but are not limited to: Fully complete the migration of applications to vendor supported operating systems.	Information Services	11/14/2017	5/15/2018	138	Current Audit
Audit of the Office of the Federal Register's Administration of the Electoral College Process (18-AUD-04)						
1	Review and update existing Electoral College Procedures to reflect the process that will be used for future Electoral College processes. Ensure the procedures are finalized and communicated prior to the next Electoral College process.	Federal Register	2/26/2018	11/30/2018	-61	No Change
2	Document a formalized process for maintaining documentation throughout the Electoral College process, including: Communications with the Archivist, States and Congress prior to the election; Logging the receipt and accounting for the number of Certificates received; Legal review of the Certificates; Meetings with Congress throughout the process; Certificates provided to Congress; Communication with states during the process, including problems identified with the Certificates and resolution of those problems; Public inspection of certificates; Implementing a system that accurately records and tracks all activity related to the Certificates; and Reporting results.	Federal Register	2/26/2018	11/30/2018	-61	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
3	Coordinate with NARA offices to formalize a process for receiving the Certificates; including determining which entity should receive the certificates and how the Certificates will be safeguarded when not in the possession of the OFR.	Federal Register	2/26/2018	11/30/2018	-61	No Change
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	2/26/2018	11/30/2018	-61	No Change
5	Review ICP reports to ensure accuracy and documentation is available to support information documented in the quarterly reports.	Federal Register	2/26/2018	11/30/2018	-61	No Change
6	Provide adequate management oversight of the Certificates' legal review, reports, and other major decisions or activity performed by staff involved in the Electoral College process.	Federal Register	2/26/2018	11/30/2018	-61	No Change
	Audit of NARA's Legacy Systems (18-AUD-06)					
1	The CIO develop a definition of a legacy system.	Information Services	3/29/2018	9/30/2019	-365	No Change
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	3/29/2018	9/30/2018	0	No Change
3	The CIO in coordination with the program offices document the total cost to operate and maintain each system on an annual basis.	Information Services	3/29/2018	12/31/2018	-92	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
4	The CIO create a centralized process to track legacy systems.	Information Services	3/29/2018	9/30/2018	0	No Change
5a	The CIO has visibility and access to all of NARA's systems. Specifically, we recommend the CIO coordinate with program offices to ensure visibility into all NARA systems.	Information Services	3/29/2018	9/30/2018	0	No Change
5b	The CIO has visibility and access to all of NARA's systems. Specifically, we recommend the CIO develop, document, and implement a policy to require program offices to annually report Information Systems to Information Services.	Information Services	3/29/2018	9/30/2018	0	No Change
5c	The CIO has visibility and access to all of NARA's systems. Specifically, we recommend the CIO document all NARA systems in the IT portfolio that is reported to OMB.	Information Services	3/29/2018	9/30/2019	-365	No Change
5d	The CIO has visibility and access to all of NARA's systems. Specifically, we recommend the CIO ensure the total operation and maintenance costs of each system is documented, and reported to OMB.	Information Services	3/29/2018	9/30/2019	-365	No Change
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.	Information Services	3/29/2018	9/30/2019	-365	No Change
7	The CIO adhere to Title 40 U.S.C. §11312(b)(3) and require the cost and benefits of each alternative be documented and reviewed during the CPIC process.	Information Services	3/29/2018	9/30/2018	0	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
8	The CIO develop and implement an operational analysis policy as required by OMB 10-27.	Information Services	3/29/2018	9/30/2018	0	No Change
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	3/29/2018	12/31/2019	-457	No Change
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	3/29/2018	12/31/2019	-457	No Change
	Audit of Human Capital Practices (18-AUD-09)					
1	The Chief of Management and Administration ensure all NARA Human Capital policies are reviewed, revised, finalized, and implemented.	CMA	6/4/2018	12/31/2020	-823	No Change
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	6/4/2018	12/31/2020	-823	No Change
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	6/4/2018	12/31/2020	-823	No Change
4	The Chief of Management and Administration ensure all SCDs are accurate.	CMA	6/4/2018	12/31/2020	-823	No Change
5	The Chief of Management and Administration identify ways to improve Human Capital's culture that demonstrates NARA's values.	CMA	6/4/2018	11/30/2018	-61	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
6	The Chief Risk Officer and Chief of Management and Administration recommend the Management Control Oversight (MCOC) consider reporting the Human Capital deficiencies identified in the audit report as a material weakness under Federal Managers' Financial Integrity Act (FMFIA).	CMA	6/4/2018	9/30/2018	0	No Change
	Audit of NARA's Processing of Textual Records (18-AUD-11)					
1	The Executive for Research Services: Develop a plan to improve rates of processing at Archives II.	Research Services	8/6/2018	3/29/2019	-180	No Change
2	The Executive for Research Services: Update the Processing Manual to enhance procedures for quality control work including selection and consistent documentation across all units.	Research Services	8/6/2018	3/29/2019	-180	No Change
3	The Executive for Research Services: Implement timeliness reviews as part of quality control reviews.	Research Services	8/6/2018	1/31/2019	-123	No Change
4	The Executive for Research Services: Revise Processing ICP Reports to comply with NARA Directive 161 internal control testing requirements.	Research Services	8/6/2018	6/28/2019	-271	No Change
5	The Executive for Research Services: Establish procedures for review of the PMRS metric as defined in NARA Directive 164-1.	Research Services	8/6/2018	10/31/2018	-31	No Change
6	The Executive for Research Services: Develop and implement procedures for the identification of digitization series candidates during processing.	Research Services	8/6/2018	3/29/2019	-180	No Change
7	The Archivist of the United States: Consider realigning the Imaging Digitization Lab under Research Services.	COO	8/6/2018	8/30/2019	-334	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	Audit of NARA's Continuity of Operations (COOP) Readiness (18-AUD-14)					
1	The Chief Human Capital Officer, in collaboration with Business Support Services, Develop and implement a process to ensure all designated ERG/DERG/RPT members maintain a copy of the current telework agreements.	Human Capital	8/20/2018	12/31/2018	-92	No Change
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	8/20/2018	3/29/2019	-180	No Change
3	The Chief Human Capital Officer, in collaboration with the Chief Information Officer: update the telework policy to include the employee's responsibility to test the connectivity to NARANet when the employee uses a personally owned computer for teleworking; and provide a reference in the policy reminding teleworkers of NARA policies and procedures for using a personally owned computing resources to conduct official NARA duties.	Human Capital	8/20/2018	12/31/2018	-92	No Change
4	The Executive for Business Support Services develop and implement a process to ensure proper planning for updating and renewing all interagency agreements	Business Support Services	8/20/2018	1/31/2019	-123	No Change

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	pertinent to NARA's continuity of operations is performed in a timely manner.					
5	The Chief Information Officer ensure the inventory is reviewed and updated for all NARA IT assets at the alternate site, including ERA equipment, at least on an annual basis.	Information Services	8/20/2018	10/31/2018	-31	No Change
6	The Chief Information Officer ensure the NARA COOP Infrastructure Specification and Rocket Center Network Diagram document is reviewed on an annual basis and updated as necessary, consistent with any other IT policies, procedures, methodologies, and supplements to the policies.	Information Services	8/20/2018	10/31/2018	-31	No Change
7	The Chief Human Capital Officer, in coordination with Business Support Services, establish controls to ensure the accurate supervisor-employee relationship is reflected on the staff accountability tool.	Human Capital	8/20/2018	12/31/2018	-92	No Change
8	The Chief Human Capital Officer, in coordination with Business Support Services, consider implementing controls to ensure the submitter only has access to the organization to which he/she belongs.	Human Capital	8/20/2018	12/31/2018	-92	No Change
9	The Chief Human Capital Officer, in coordination with Business Support Services, consider implementing a unique username and password to each authorized submitter of the form for user accountability and data integrity.	Human Capital	8/20/2018	12/31/2018	-92	No Change

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10	The Executive for Business Support Services, in collaboration with the Offices of Human Capital and Information Services as applicable, strengthen the process to manage personnel readiness data submission to more accurately count completed submission and verify the accuracy of the data submitted.	Business Support Services	8/20/2018	11/30/2018	-61	No Change
11	The Executive of Business Support Services, develop and implement a process to remind the participants who have not completed the submission to complete it.	Business Support Services	8/20/2018	11/30/2018	-61	No Change
12	The Executive of Business Support Services, in collaboration with the Offices of Human Capital and Information Services as applicable, consider providing exercise participants with personalized link to the data sheet, with pre-populated basic personnel information, where participants could review, verify, and add required information for data integrity and an efficient use of exercise time.	Business Support Services	8/20/2018	11/30/2018	-61	No Change
13	The Chief Information Officer, in coordination with Business Support Services as applicable, conduct a review and reconciliation of the lists of mission-critical systems identified by Information Services and Business Support Services.	Information Services	8/20/2018	3/29/2019	-180	No Change
14	The Chief Information Officer, in coordination with Business Support Services as applicable, conduct a detailed re-evaluation of mission-criticality of the systems that are not currently listed as mission-critical, and reflect the results on the reconciled list of mission-critical systems identified from Recommendation 13.	Information Services	8/20/2018	3/29/2019	-180	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
15	The Chief Information Officer, in collaboration with Business Support Services as applicable, conduct a detailed review of the FIPS PUB 199 security categorization of all mission-critical systems identified from Recommendations 13 and 14 to ensure all of such systems are subject to appropriate contingency planning requirements documented in the NARA IT Security Methodology for Contingency Planning.	Information Services	8/20/2018	3/31/2020	-548	No Change
16	The Chief Information Officer, in collaboration with Business Support Services as applicable, develop a procedure to review the reconciled list of mission-critical systems identified from Recommendations 13 and 14 above at least on an annual basis to re-evaluate the systems' mission-criticality, identify newly commissioned, mission-critical systems, and remove systems that have been decommissioned.	Information Services	8/20/2018	3/29/2019	-180	No Change
17	The Chief Information Officer, in coordination with the Office of Federal Register, include EFR in NARA's information system inventory.	Information Services	8/20/2018	3/29/2019	-180	No Change
18	The Chief Information Officer, in coordination with the Office of Federal Register, d designate a system owner, information system security officer, and a Contracting Officer's Representative (if applicable) to EFR to effectively maintain security and availability of the server.	Information Services	8/20/2018	3/29/2019	-180	No Change
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	Information Services	8/20/2018	3/31/2020	-548	No Change

Rec. No.	Recommendation Text	Office	Date Issued	Expected Implementation Date	Days Past Due	Revised Implementation Date
	security plan, security assessment report, risk assessment report, plan of action and milestones (PO&M), contingency plan, contingency plan test, and business impact analysis.					
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	8/20/2018	3/31/2020	-548	No Change
21	The Director of the Federal Register develop and maintain an up-to-date Standard Operating Procedures (SOP) for maintaining and testing the EFR system.	Federal Register	8/20/2018	12/31/2018	-92	No Change
22	The Director of the Federal Register develop and implement a process to test the SOP at least on a quarterly basis, including as part of the annual Eagle Horizon and Operation Activate exercises, and document and submit to NARA's Continuity Coordinator the test results.	Federal Register	8/20/2018	12/31/2018	-92	No Change
23	The Executive for Business Support Services include the activation of EFR as part of the annual Eagle Horizon exercise plan, regardless of the continuity scenarios applicable to the year, and develop and implement a process to review the test results from OFR.	Business Support Services	8/20/2018	5/31/2019	-243	No Change
24	The Executive for Business Support Services, in coordination with Corporate Records Management, ensure NARA's essential COOP documents, including COOP Plans, OEPs, PIPs, and REPs, are reviewed on an	Business Support Services	8/20/2018	9/30/2019	-365	No Change

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	annual basis, updated as needed, and stored in designated electronic locations.					
25	The Executive for Business Support Services ensure Occupant Emergency Plans for all NARA sites, where NARA is a tenant agency, are provided to NARA's Designated Official for the site on an annual basis for review, update if necessary, and a signature.	Business Support Services	8/20/2018	9/30/2019	-365	No Change
26	The Executive for Business Support Services, in coordination with Corporate Records Management, develop and implement a file structure to more effectively organize and manage current and non-current COOP documents for each MEF, ESA, and facility.	Business Support Services	8/20/2018	1/31/2019	-123	No Change
27	The Executive for Business Support Services, in coordination with Corporate Records Management, Develop and implement a process to maintain version control and record of changes for revisions made to essential COOP documents and Emergency Response Plans.	Business Support Services	8/20/2018	9/30/2019	-365	No Change
28	The Executive for Business Support Services, in coordination with Corporate Records Management, ensure all essential COOP documentation and their locations are reflected in CERIT.	Business Support Services	8/20/2018	4/30/2019	-212	No Change
29	The Executive for Business Support Services review the training needs of staff in light of their comments in exercise AARs and either: (a) develop and implement the content and schedule of mission-specific COOP training to be provided to each NARA office on a periodic basis; or (b) develop and implement a systematic process to ensure and all NARA employees take the correct, annual	Business Support Services	8/20/2018	3/29/2019	-180	No Change

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	COOP training module commensurate with their roles and responsibilities, and accurately track the status based on the assigned roles.					
30	The Executive for Business Support Services develop and implement a systematic process to: (a) conduct a review of the source data for SF-2050 for NARA's facility in College Park, MD (Archives II), which is the primary operating facility on an annual basis for accuracy, update the data if necessary, and maintain documentation of the review for future reference; and (b) submit the completed form to GSA on an annual basis.	Business Support Services	8/20/2018	3/29/2019	-180	No Change

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