Action Plan for OIG Audit Report 16-06, Audit of NARA's Preparation and Planning for the Receipt of President Obama's Administration's Records and Artifacts

Approved by the Archivist May 18, 2016

Recommendation Number: 1

Recommendation: We recommend the Chief Information Officer, General Counsel, and the Presidential Materials Division continue to work with the EOP in order to obtain an inventory of data types and formats; expanded data samples; and a schedule to get the data from EOP recording-producing systems that have previously seen high-access demand.

Management Discussion: As noted in the Archivist's Management Response to the Report, the report, including its Executive Summary, Background, Audit Results, and Recommendations, only addresses matters up to the conclusion of the OIG's audit work, which ended in January 2016. As noted below, the issues raised in the recommendations have been addressed by information and data provided by the Executive Office of the President (EOP) and through coordinated actions between NARA and the EOP.

Actions Already Taken: NARA's technical team and archival stakeholders have received updated inventories of Presidential Records Act (PRA) record systems by data type and have assigned archival priority designations to them, and have onsite access to working inventories that are updated to reflect additional information and project status. NARA has also continued to receive large samples of production data from PRA systems at the Executive Office of the President (EOP) that have previously seen high-access demand and used them to analyze and test their compatibility with ERA EOP. Since February 1, 2016, NARA has received and tested new samples from Microsoft Exchange (5,644,254 emails), the White House photo system (92,813 master images with captions and .jpgs), Presidential Daily Schedule (368,358 entries), and WAVES (254,603), among others. The purpose of the data samples is to test that the exports capture identified record content from the EOP systems and that exports meet NARA's Submission Information Package Specifications for ingest into ERA EOP. In addition, NARA and the EOP established a schedule to acquire, analyze, and test expanded data samples from these systems in the February 2016 Memorandum of Understanding (MOU).

While we believe the above activities close the recommendation, we will continue to work with the EOP to refine the PRA system inventory by data type and will use samples from production systems to test, conduct, and document trial and production transfers.

Planned Completion Date: Per actions already taken that are described above, we believe the response to this recommendation is complete.

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Documentation to be Sent with the Final Action Plan: Information Services has provided the following documentation:
1. NARA data set list by application P1-P2, Feb. 26, 2016
2. Memorandum of Understanding between The EOP and NARA, February 26, 2016
3. Letter from Hugh L. Brady, General Counsel, Office of Administration EOP, to Gary M. Stern, General Counsel, National Archives and Records Administration, April 28, 2016

Recommendation Number: 2
Recommendation: We recommend the Chief Information Officer develop a contingency plan that could be activated to ensure responses to special access requests occur in a timely manner, in the event the ERA EOP System is not able to comply with the PRA.

Management Discussion: NARA's Chief Information Officer drafted a contingency plan by which, if a determination is made that the ERA EOP System is not able to comply with the PRA, a series of actions would be invoked to ensure that the custody, control, preservation, and access to electronic Presidential records is accomplished in an orderly, complete, and accurate manner. This plan was reviewed and approved by NARA's General Counsel and the Director, Presidential Materials Division.

Actions Already Taken: The contingency plan was completed and approved by the Chief Information Officer. NARA will monitor transition status and progress of DTA and Data Transport and Control (DATR) activities for conditions determining if contingency plan should be invoked.

Planned Completion Date: Per actions already taken that are described above, we believe the response to this recommendation is complete.

Documentation to be Sent with the Final Action Plan: Information Services has provided the approved EOP ERA Contingency Plan.