

**Audit of the Accuracy of NARA's
Performance Measurement Data**

OIG Audit Report No. 10-13

July 15, 2010

Executive Summary

The Office of Inspector General (OIG) has completed an audit designed to evaluate and report upon the accuracy and reliability of performance data entered into the National Archives and Records Administration (NARA) Performance Measurement and Reporting System (PMRS). The Government Performance and Results Act (GPRA)¹ of 1993 require the head of each federal agency to develop and track performance and to report annually to the President and Congress. Our overall objective was to verify the accuracy and reliability of performance data entered into NARA's PMRS. We reviewed data collected for nine performance measurements related to three critical areas:

1. Preserve and Process,
2. Access,
3. Infrastructure.

Of the thirty seven FY 2009 performance metrics² identified by NARA we selected nine for evaluation in this annual cycle. Of the nine selected, auditors identified problems with five metrics (see column 2 of Attachment I). For four of these metrics we determined that data entered into NARA's PMRS was either inaccurate or was not adequately documented. Thus, adequate reliance could not be placed upon this data. This condition existed because management controls over the maintenance of documentation and verification of performance data were not adequate. Without the establishment of appropriate management controls there is a risk performance data could be unreliable. Given unreliable or flawed data, users of the data could make inaccurate management decisions to the detriment of agency operations.

In the case of the fifth metric identified as #2.1: *Percent of Scheduled Transfers of Archival Records Transferred to NARA at the Scheduled Time*, we found the data as reported to be flawed and misleading as it is composed of a very limited subset and not the total universe of electronic records available for transfer. Without a caveat defining this limitation on scope, users of this data could readily misconstrue the content and value of this information as to embrace a far wider population than actually defined. This could lead to inaccurate conclusions and determinations by stakeholders.

Management concurred with the two recommendations contained in this report which, when implemented, will help ensure the accuracy and reliability of future data entered into PMRS.

¹ Congress enacted GPRA in 1993 to improve public confidence in the Federal Government by holding agencies accountable through setting program goals, measuring performance against those goals, and reporting publicly on progress. This act is contained in Public Law 103-62. NARA submits an annual Performance report to Congress, the President, and the public November 15 each year which reports NARA's efforts to meet performance goals as outlined in its strategic plan.

² The FY 2009 Annual Performance Plan established thirty seven performance metrics to be used in assessing program performance towards accomplishing NARA's six strategic goals. The six strategic goals are: 1) Our Nation's Record Keeper, 2) Preserve and Process, 3) Electronic Records, 4) Access, 5) Civic Literacy, and 6) Infrastructure.

Background

The Government Performance Results Act of 1993 (GPRA) requires federal agencies to complete strategic plans in which they define their missions, establish results-oriented goals, and identify the strategies needed to achieve those goals. GPRA also requires federal agencies to prepare annual performance plans articulating goals for the upcoming fiscal year that are aligned with their long-term strategic goals. Finally, GPRA requires agencies to measure performance toward the achievement of the goals in the annual performance plan and report annually on their progress in program performance reports.

Congress passed GPRA because it found, in part, federal managers were seriously disadvantaged in their efforts to improve program efficiency and effectiveness due to insufficient articulation of program goals and inadequate information on program performance. Congressional policymaking, spending decisions, and program oversight was also handicapped by insufficient attention to program performance and results. GPRA was passed by Congress to alleviate these problems by requiring federal agencies to incorporate strategic planning and performance measurement into agency management and to improve the confidence of the American people in the capability of the federal government.

By systematically holding federal agencies accountable for achieving program results, GPRA is intended to improve congressional decision making by giving Congress comprehensive and reliable information on the extent to which federal programs are fulfilling their statutory intent. Managers are to use performance information to continuously improve organizational processes, identify performance gaps, and set improvement goals. Decision makers are to routinely receive the performance and cost information needed to assess their programs and make informed decisions.

NARA's Policy and Planning Staff (NPOL) is responsible for performance reporting as outlined by GPRA. NPOL is tasked with collecting and reporting performance information from databases created by others and from a PMRS web application. PMRS is the official source for statistical management information at NARA. Specifically, PMRS reports how NARA is doing relative to the numeric goals in NARA's Strategic Plan and the various annual performance plans. NARA reports on their progress in annual performance reports submitted to the President and Congress. PMRS publishes figures on about fifty subject areas, collecting data monthly from approximately seventy organizational units. The data collected is published on NARA's internal website, www.nara-at-work.gov.

This audit represents the latest in an ongoing process by which the OIG reviews individual performance metrics on a periodic basis.

Objectives, Scope, and Methodology

Our overall objective was to verify the accuracy and reliability of performance data entered into NARA's PMRS. We reviewed data collected for nine performance measurements related to three critical areas:

1. Preserve and Process,
2. Access,
3. Infrastructure.

Specifically, we examined the accuracy of data for nine metrics (see Attachment 1). To achieve our objectives, we interviewed officials in the Policy and Communications Staff (NPOL), Office of Records Services – Washington, DC (NW), Office of Presidential Libraries (NL), Office of Regional Records Services (NR), Dwight D. Eisenhower Library, Lyndon Baines Johnson Library, and Southeast Region (NRC).

We reviewed the NARA Strategic Plan 2006-2016, Fiscal Year (FY) 2009 Performance Plan, guidance related to PMRS metric specifications, Government Performance And Results Act of 1993 and the Office of Management and Budget's Circular A-11 Part 6, *Preparation and Submission of Strategic Plans, Annual Performance Plans, and Annual Program Performance Reports*.

This performance audit was conducted in accordance with generally accepted government auditing standards (GAGAS) between March 2009 and December 2009. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Management Controls Over PMRS Data Require Enhancement

NARA lacks adequate management controls over the maintenance and verification of PMRS performance data. This condition exists because NARA's Office of Policy and Planning (NPOL) has not provided guidance and established a framework necessary to ensure the accuracy and integrity of PMRS data. NARA operating units are not required to establish and follow written policies and procedures to appropriately capture, document and ultimately validate data entered into PMRS. Federal regulations specifically identified under OMB Circular A-123 require agency management to ensure reported performance data is properly documented and verified. In order for NARA to provide accurate and reliable data the establishment of formal, documented controls including described processes for the maintenance and verification of performance data must be established. Without appropriate management controls the risk exists that performance data could be flawed and inaccurate thus compromising the intent of the Act.

NARA Lacks PMRS Supporting Documentation

Sufficient source documentation was not maintained for three metrics reviewed; therefore, we could not validate the accuracy and reliability of the data contained in PMRS for these metrics. OMB Circular A-11 states federal agencies are required to assess the completeness and reliability of performance data reported. GAO Standards for Internal Control in the Federal Government states all federal transactions need to be clearly documented and readily available for examination. Required documentation should appear in management directives, administrative policies, or operating manuals. All documentation and records should be properly managed and maintained.

Specifically, we found adequate support documentation did not exist for the following metrics:

1. Metric # 2.2 *Percent of Archival Traditional Holdings that Have Been Processed to the Point Where Researchers Can Have Efficient Access to Them* for the Dwight D. Eisenhower Library (NLDDE): The calculation for presidential library holdings is as follows:

$$\frac{\text{Total cubic feet of traditional records ever processed}}{\text{Total cubic feet of traditional records}} \times 100$$

The numerator data on total processed records could not be verified because the data for this metric was an estimate and actual data³ had not been obtained. NARA personnel responsible for collecting and reporting data for this metric stated that prior to October 2008, this measure was never traced or reported and was initiated with an estimate based on a historical number of total processed

³ Performance data being reported is a composite of (1) an estimate based on a historical number of total processed records prior to FY 2008 and (2) actual data that has been accumulated since October 2008.

records. No documentation was made available to the auditors to define how this estimate was actually calculated. NLDDE is currently establishing a Master List Register (MLR)⁴ access database that will identify the actual total cubic feet of traditional records processed. At the time of the audit NLDDE reported the MLR was approximately 75% complete and they were not sure when the remaining work to complete the list would be completed. Until NLDDE finishes their MLR this metric will not be completely accurate or valid and properly reported in PMRS.

2. Metric # 2.7 *Percent of NARA Archival Holdings Requiring Preservation Action*: The calculation for this metric is as follows:

$$\frac{\text{Backlog of archival holdings that require preservation action}}{\text{Total cubic feet of archival holdings}} \times 100$$

The back log is calculated as follows: Base-line at-risk backlog less holdings treated plus new accessions (multiplied by the at-risk percentage). The documentation supporting the base-line at-risk backlog and the at-risk percentages applied was not available for verification. Both the baseline backlog and the at-risk percentage were established by an extensive condition survey⁵ performed in FY 2005. The data acquired to support this condition survey was misplaced and was not available for our review per responsible preservation programs (NWT) personnel. NWT senior officials expressed their regret concerning the misplacement of the survey data and stated the data should have been available for examination.

3. Metric # 6.3 *Percent of Public Network Applications Availability*: The calculation for this metric is as follows:

$$\frac{\text{\# of actual hours of availability of public network applications}}{\text{Total \# of hours (24*7) in the period}} \times 100$$

Documentation for actual hours of public network applications availability was not adequately maintained. Responsible NARA personnel were able to provide email documentation⁶ identifying the hours of downtime per month. These emails were initiated by various NARA IT contractors and identified the number of downtime hours for the month. This is insufficient documentation for metric

⁴ The Master Location Register (MLR) is a database that maintains location data and related information for textual holdings including data identifying which records have been processed.

⁵ Office of Records Services-Washington D.C. (NW) conducted an extensive survey, composed of approximately 1,800 sample sets, for the purpose of evaluating the textual preservation needs of NW holdings. The results of this survey indicate 67%, or 1,390,000 cubic feet (base-line at risk backlog) of NW's textual holdings require some type of preservation work.

⁶ Auditors reviewed six of the ten applications included in this performance measurement. Of the six applications reviewed most, but not all, reported downtime was supported with email documentation. The email documentation was not sufficient because details such as dates of downtime, reason for downtime, and sign-off by a responsible NARA employee were not included.

performance because details such as dates of downtime, reason for downtime, and sign-off by a NARA employee were not included in the emails. One NARA official we interviewed believed the IT contractors were documenting these elements in a Problem Incident Report (PIR)⁷ for each downtime event. However, the IT contractors were unable to provide any additional documentation. Thus, we were unable to determine whether the reported downtime was accurate or had been properly verified by NARA staff. At a minimum, monthly reports detailing each public network application's scheduled and unscheduled downtime with associated times and dates would be required to adequately document the data collected. Additionally, the responsible NARA official(s) should attest to the report's accuracy and completeness. Ideally, a report from a logging system that supports downtime events should be included with the monthly public network application downtime reports.

NARA Continues to Lack Data Verification Procedures

NARA has not established procedures to ensure performance data is accurate and reliable. Specifically, NPOL has not developed verification guidance requiring those collecting data to (1) verify the collected data for accuracy and (2) reconcile source documentation to the data reported in PMRS. OMB Circular A-123 states agency management must ensure internal controls such as periodic reviews, reconciliations or comparisons of performance data are implemented. Further, these defined controls should be included as part of the regular assigned duties of personnel. Without appropriate verification procedures there is an increased risk reported performance statistics are inaccurate and could impact upon management's ability to make informed decisions. It should be noted that data verification weaknesses have been identified in specific program offices in three prior PMRS audits. A lack of established verification procedures appears to be more universal than originally reported.

Specifically, we found the following:

- Data reported for one of the nine metrics we reviewed was misreported. The metric # 2.4 entitled *Annual Number of Federal Pages Declassified (in thousands)* was underreported on NARA's Performance and Accountability Report, FY 2009 by 1.266 million pages. NARA reported 11.72 million pages declassified and should have reported 12.986 million; an eleven percent difference. The Supervising Archivist responsible for reporting data to PMRS stated there were several months in which support documentation received was incorrectly reported to PMRS. The Supervising Archivist was unaware of the reporting discrepancy because there are no verification/reconciliation procedures in place to ensure the reported data accurately reflects the collected data.
- Several NARA employees responsible for collecting and inputting data into PMRS for metrics we reviewed did not validate the data they had input and were

⁷ A PIR would provide detailed information such as (1) date of incident, (2) number of hours, (3) cause of downtime, (4) resolution of incident, and (5) sign-off by a responsible NARA official.

unfamiliar with using PMRS. Thus, a review procedure of comparing inputs to outputs is not being completed for all performance metrics.

- During the audit we found the data entered into PMRS for four metrics had minor errors. Two of these errors were discovered by personnel responsible for collecting the data and were corrected during the audit. However, it is questionable whether these errors would have been identified and corrected if there had not been an ongoing audit of these metrics. The other two metrics with minor errors were not corrected during the audit. For example, metric #2.4 *Annual Number of Federal Pages Declassified (in thousands)* data input sheets showed that 71k pages were declassified for October 2008 while subsequent PMRS reports showed that no pages were declassified for that period. Likewise metric #6.3 *Percent of Public Network Applications Availability* did not calculate the total number of hours in the period correctly as one application was not factored in the total for the month of November. Had NARA implemented a verification/review process these errors might have been detected and addressed.
- Six of the nine metrics we reviewed lacked detailed written procedures (at the business unit level) to provide guidance for the collection of performance data. While the remaining three metrics did have written policies addressing the procedure for collecting data, they did not include verification/review procedures.
- Key personnel we interviewed for four of the metrics stated they do not verify or review the performance data they collect and report to PMRS. Lack of written procedures, including periodic verification procedures, increases the risk of errors in NARA's performance data.

Recommendation 1

The Archivist should ensure that NPOL establishes and oversees an internal control environment under which all PMRS metrics have written procedures identifying the processes for collecting, reporting, and verifying performance data. These written procedures should address: (1) data management-- specifically identifying how performance data is documented and maintained and (2) periodic data verification procedures including reconciliation procedures between source data to data reported in PMRS. Verification of performance data should be documented and confirmed by a second party such as a supervisor where appropriate.

Management Comment(s)

Management concurred with this recommendation.

Metric “Percent of Scheduled Transfers of Archival Records Transferred to NARA at the Scheduled Time” is Misleading

Performance metric #2.1: *Percent of Scheduled Transfers of Archival Records Transferred to NARA at the Scheduled Time (electronic)*, does not objectively measure NARA’s performance in receiving permanent and valuable electronic federal records. While NPOL and the Electronic and Special Media Records Services Division (NWME) collaborated on the development of this metric it did not yield a satisfactory output or outcome. The purpose of a performance metric under GPRA is to support the objective evaluation of a program or function within an agency. The performance result derived and reported for this metric is misleading as it is based upon a limited subset of records, not the overall population. Thus, results or outcomes defined by this metric may be skewed. The effect is that stakeholders may misconstrue the results as reported by NARA for this critical reporting area.

The calculation for this metric is as follows:

$$\frac{\text{\# of disposition authorities that produced expected transfers this year}}{\text{\# of disposition authorities expected to produce transfers this year}} \times 100^8$$

This metric was designed to document NARA’s performance in getting federal agencies to transfer their electronic records. However, the metric is flawed because all the data necessary to effectively calculate performance is not readily available or objectively obtained. Specifically, the following data is excluded from the universe of electronic records (the denominator of this measurement): (1) any electronic record that has not been scheduled;⁹ (2) electronic records from agencies not subject to the Chief Financial Officers’ (CFO)¹⁰ Act; (3) electronic records not deemed valuable by the processing archivist; (4) electronic records from agencies with no consistent history of transferring records; and (5) any electronic record schedule lacking clarity or specificity¹¹.

⁸ This is the denominator for the metric which states, “During the preceding fiscal year, NARA will have collaborated with the Chief Financial Officers’ (CFO) agencies (adjusted) to identify specific disposition authorities that will produce records for NARA during the subsequent fiscal year.”

⁹ NWME and NWC officials stated there are many federal agencies that do not schedule their permanent electronic records because these agencies do not have knowledgeable staff capable of appropriately identifying and scheduling their records.

¹⁰ Most non-CFO agencies are excluded; however, non-CFO agencies with records of interest such as the Central Intelligence Agency (CIA) are included because the CIA produces records of archival value.

¹¹ NARA has recently made several changes to its approach to scheduling records in an effort to make scheduling easier. NARA officials believe these changes benefit both NARA and the agencies. However, these changes allow the transfer schedules to contain vague language making it difficult to determine when to expect a transfer. Specifically, the following record schedules would be excluded from the calculation of this performance measurement because of the ambiguity of the record schedule: (1) records schedules which do not identify explicit transfer dates; (2) media neutral schedules which do not specify whether the permanent record is in textual or electronic format; and (3) ‘big bucket’ scheduling, intended to address problems associated with the constant need to update schedules, where the schedule does not adequately identify permanent records.

As a result of electronic records being excluded from the calculation of this metric, NARA's reported performance results for this metric was based on a subjective subset of the entire universe of records to be transferred. Although this limitation of the scope is alluded to in NARA's Performance report, the wording of the measure is misleading and users of this data could misinterpret the information generated and reported under this metric to embrace a far wider population than actually defined. This could lead to inaccurate conclusions and determinations by stakeholders.

Additionally, NWME and NWC¹² officials stated they would like to readdress some of the merits of this metric with NPOL. In addition to the issues identified above, NWME and NWC expressed other concerns with this metric including its title which both NWME and NWC feel is misleading. Specifically, the "at the scheduled time" portion of the metric title implies federal records have a specific date they are available for transfer. NWME officials stated the scheduling process is not an exact science, and as such, cannot be pinned down to specific dates and timeframes. NWC analogized the clarity and effectiveness of this metric to a contest where the goal is to collect as many shoes as you could in a set time frame. How effective is your performance when you review the bucket of shoes and find you have the wrong size, color, or none of the shoes are in matching pairs? And finally, NWME officials stated they are unsure how the long-term goal was established (85% of scheduled transfers are received at the scheduled time by 2016). NWME indicated this may not be a realistic goal and would like to collaborate with NPOL to establish an obtainable goal.

Recommendation 2

We recommend the Directors of NPOL, NWME, and NWC evaluate the merits of the metric #2.1: *Percent of Scheduled Transfers of Archival Records Transferred to NARA at the Scheduled Time* as a performance measure and either remove it from the list of reported performance metrics or revise it to be more reflective of an objective measurement.

Management Comment(s)

Management concurred with this recommendation.

¹² This metric measures electronic and traditional records. The traditional records portion of the metric is slightly different and is implemented by Access Programs (NWC).

Attachment 1

NARA METRICS INCLUDED IN OIG REVIEW

| Numeric Metric | Metric Verified | Internal Control Weaknesses Identified |
|--|---|--|
| Metric # 2.1 Percent of Scheduled Transfers of Archival Records Transferred to NARA at the Scheduled Time (electronic) | <ul style="list-style-type: none"> • Reported performance data on this metric is potentially misleading. | No written procedures |
| Metric # 2.2 Percent of Archival Traditional Holdings Processed/Accessible to Researchers | <ul style="list-style-type: none"> • Denominator; NATD¹³ for NLDDE: missing source documentation. | No written procedures Does not verify data |
| Metric # 2.4 Annual Number of Federal Pages Declassified (in thousands) | <ul style="list-style-type: none"> • Numerator; not verified: 11% discrepancy between reported data and support documentation. • Minor error detected by auditor and not corrected prior to publication of data. | No written procedures Does not verify data |
| Metric # 2.4 Number of Pages Completed in the NDI Process (in thousands) | <ul style="list-style-type: none"> • Data verified. | No written procedures Does not verify data |
| Metric # 2.7 Percent of Archival Holdings Requiring Preservation Action | <ul style="list-style-type: none"> • Denominator; NATD: missing source documentation. • Minor error detected and corrected by auditee during audit. | No written procedures |
| Metric # 4.2 Percent of Archival Holdings (traditional and electronic) Available Online | <ul style="list-style-type: none"> • Data verified, minor error detected and corrected by auditee during audit. | Written policy does not address review/verification procedures |
| Metric # 4.3 Percent of NARA Holdings Described in ARC | <ul style="list-style-type: none"> • Data verified. | Written policy does not address review/verification procedures |
| Metric # 4.2 Number of ARC Uses | <ul style="list-style-type: none"> • Data verified. | Written policy does not address review/verification procedures |
| Metric # 6.3 Percent of Public Network Applications Availability | <ul style="list-style-type: none"> • Numerator; NATD: source documentation is insufficient. • Denominator, minor error detected by auditor and not corrected prior to publication of data. | No written procedures Does not verify data |

¹³ Not Able To Determine (NATD).



National Archives and Records Administration

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Date: June 23, 2010

To: Paul Brachfeld,
Inspector General

From: Susan M. Ashtianie,
Director, Policy and Planning Staff (NPOL)

Subject: OIG Draft Report No. 10-13,
Audit of the Accuracy of NARA's Performance Management Data

Thank you for the opportunity to review and comment on this draft audit report. We appreciate the efforts of your staff and all parties associated with the audit process. We did not take advantage of a meeting with the auditor during the comment period, because each point below was raised in our exit conference.

While we concur with intent of both recommendations, NPOL strongly objects to both of the report's findings regarding metric #2.1: *Percent of Scheduled Transfers of Archival Records Transferred to NARA at the Scheduled Time (electronic)*, a) that the metric does not objectively measure NARA performance in receiving electronic Federal records, and b) that NPOL did not effectively collaborate with NWME in its design.

As to the first, the report alleges that *this metric is misleading as it is based upon a limited subset of records, not the overall population*. The metric is indeed based on a limited subset of records for the very good reason that these are all that can be measured. The report suggests we add five other kinds of records, but that cannot be done for the very reasons that the report includes in its footnotes. For instance, the report suggests we include records from *any electronic record schedule lacking clarity or specificity*. If the schedule lacks specificity as to when the records are due, how can we possibly measure whether records are arriving *at the scheduled time*? It cannot be done.

We have already tried to use a larger universe as the report is suggesting. It didn't work. In 2006 and 2007, we based this metric on the CASPER database which NWME cleaned up for the purpose. (CASPER relates records schedules to accessions.) The attempt failed. The universe was too small, for all the reasons cited in footnote 11 of the report. At NWME's suggestion, we abandoned CASPER as our data source.

The current design is Plan B. Despite its limitations, it is a legitimate measure of our success in getting the electronic records owed to us. In any case, it is the only option available, the ideas in the report having been tried and found to be unworkable.

The current design focuses on a smaller but measurable universe and mitigates that deficiency by focusing on the most important records. We ask NWME to identify at the start of the year which records we most want – in consultation with the agencies. We then measure our success in getting them. That should be easy. We should be getting 95%.

In fact, we got only 44% in FY2009. Our assertion is that if we can't get the most important records – the ones we identify at the start of the year and specifically pursue – then we probably are not doing any better with the rest of the records except by blind luck. We believe that for all its flaws, this metric is spotlighting a genuine performance problem. For that reason, we intend to keep it.

As to our supposed lack of collaboration with NWME, the claim is flat wrong. Our meeting notes from January, 2008 show clearly that *the current design of this metric came from NWM*, not from us. It was their idea! Paul Wester (NWM) as well as senior NWME staff were present and had their say. Further, the metric has been used without complaint for two years. As with the earlier CASPER metric, experience may show the need for changes. We are happy to work again with NWME to see if that is the case.

If you have any questions concerning these comments, please contact Mary Drak via email at mary.drak@nara.gov or by phone at 301-837-1668.



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