

FY 2020 OMB Supplemental Data Call

National Archives and Records Administration

Contents

FY 2020 OMB Supplemental Data Call NARA.....	1
Agency-Wide Responses	2
Question 2: Detecting and Recovering Improper Payments (PIIA Section: 3352(e), 3352(e) (1)).....	2
Question 2 Free Text: Detecting and Recovering Improper Payments (PIIA Section: 3352(e), 3352(e) (1))	2
Question 3: Recovery Audits (PIIA Section: 3352).....	2
Question 4: Excluded Programs (PIIA Section: 3352(e) (7)).....	2
Question 5: Financial and Administrative Controls (PIIA Section: 3357(d)).....	2
Question 6 Free Text: Statutory Thresholds and Risk Assessments (PIIA Section: 3352(a) (3) (C))	3
NARA Agency Reporting.....	4
Question 12: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))	4
Question 12 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))	4
Question 13: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))	4
Question 13 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))	4
Question 14: Bringing the program into compliance (PIIA Section: 3353(b) (5)).....	4
Question 14 Free Text: Bringing the program into compliance (PIIA Section: 3353(b) (5))	5
Question 15 Free Text: Creating accountability to achieve compliance (PIIA Section: 3353(b) (1) (B)).....	5
Question 16: Do Not Pay Initiative (PIIA Section: 3354(b) (5))	5
Question 16 Free Text: Do Not Pay Initiative (PIIA Section: 3354(b) (5)).....	5

Agency-Wide Responses

Question 2: Detecting and Recovering Improper Payments (PIIA Section: 3352(e), 3352(e) (1))

Please describe the steps the agency has taken to detect and recover improper payments.

ANSWER:

Indicate root cause	Indicate mitigation strategy/corrective action(s) taken	Provide any additional detail (optional free text)	Select the actual completion date for action(s) taken
14. Other	Other (free text)		Other

Question 2 Free Text: Detecting and Recovering Improper Payments (PIIA Section: 3352(e), 3352(e) (1))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: The root cause of NARA's improper payments to outside vendors is typically due to administrative errors. The remaining improper payments identified by NARA and NARA's shared service provider for FY 2020 were related to employee payroll and travel payments.

NARA's corrective action is part of their normal course of business i.e., sending notification letters, establishing accounts receivable, and payroll garnishments when necessary. These actions are completed as soon as improper payments are detected and typically recovered within the same year.

Question 3: Recovery Audits (PIIA Section: 3352)

Please describe the steps the agency has taken to recover improper payments identified in recovery audits. Please note there is a 3000 character limit.

ANSWER: All of NARA's programs were reviewed to determine if recovery audits were cost effective for the agency. Given the immaterial amount of NARA's yearly improper payments and the low program risks, recovery audits are not cost effective.

Question 4: Excluded Programs (PIIA Section: 3352(e) (7))

Please list any programs the agency excluded from review under its payment recapture audit program because a payment recovery audit program was determined to not be cost-effective and provide a summary of the justification used to make that determination. Please note there is a 3000 character limit.

ANSWER:

N/A

Question 5: Financial and Administrative Controls (PIIA Section: 3357(d))

Please describe your agency's progress:

- *Implementing the financial and administrative controls established by OMB in OMB Circular A-123 to identify and assess fraud risks and design and implement control activities in order to prevent, detect, and respond to fraud, including improper payments; the fraud risk principle in the Standards for Internal Control in the Federal Government published by the Government Accountability Office*

(commonly known as the "Green Book"); and Office of Management and Budget Circular A-123, with respect to the leading practices for managing fraud risk;

- Identifying risk and vulnerabilities to fraud, and
- Establishing strategies, procedures, and other steps to curb fraud.

ANSWER:

Implementation of OMB Circular A-123	Implementation of GAO Green Book	Identifying Risk and Vulnerabilities	Establishing Strategies, Procedures and Other steps
2 – Established	2 – Established	2 – Established	2 – Established

Question 6 Free Text: Statutory Thresholds and Risk Assessments (PIIA Section: 3352(a) (3) (C))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER:

NARA reviews the following programs each year to determine if improper payments exceed the statutory threshold and they conduct risk assessments for these programs every 3 years. Risk assessments were last conducted in FY 2020. None of the programs met the statutory threshold and all were considered low risk.

- 1) Legislative Archives, Presidential Libraries, and Museum Services
- 2) Research Services
- 3) Agency Services
- 4) Administrative Overhead
- 5) Repairs and Restoration
- 6) National Historical Publications and Records (Grants)
- 7) Office of Inspector General

NARA Agency Reporting

Question 12: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Please indicate which of the six (6) criteria (if any) were determined to be non-compliant in the most recent IG compliance review.

ANSWER:

Indicate compliant or non-compliant	Compliance criteria
Non-Compliant	1. Publish an AFR or PAR

Question 12 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: NARA's publication of their FY 2019 Agency Financial Report is still pending due to an ADA violation. Other than publicly reporting the FY 2019 improper payment information, there were no other non-compliances noted for improper payments during the audit. NARA's FY 2019 improper payments totaled \$110,934.

Question 13: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Please indicate how many consecutive years this program was deemed non-compliant as of the most recent IG compliance review (regardless of which of the six (6) criteria were determined non-compliant).

ANSWER:

Indicate consecutive years
1

Question 13 Free Text: Inspector General Compliance (PIIA Section: 3352(f) (2) (A) and (B); 3353(b) (1) (A); 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: NARA's ADA violation was unrelated to improper payments.

Question 14: Bringing the program into compliance (PIIA Section: 3353(b) (5))

If deemed to be non-compliant in the most recent fiscal year, please briefly describe the plan the executive agency will take to bring the program into compliance.

ANSWER:

Indicate root cause	Indicate planned corrective actions
14. Other	Other (free text)

Question 14 Free Text: Bringing the program into compliance (PIIA Section: 3353(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: NARA expects to publish their FY 2019 AFR in October 2020.

Question 15 Free Text: Creating accountability to achieve compliance (PIIA Section: 3353(b) (1) (B))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER: NARA's ADA violation and therefore its inability to publish FY 2019 improper data was unrelated to improper payments.

Question 16: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Please indicate whether the program uses the DNP (yes/no) and whether the Do Not Pay Initiative has reduced/prevented improper payments (yes/no). Additionally, please provide the frequency of corrections (week/month range) or identification of incorrect information (range of false hits?).

ANSWER:

Does the program use the Do Not Pay Initiative (DNP) (yes/no)	Has the DNP reduced/prevented improper payments (yes/no)	How frequently are corrections made?	How frequently is incorrect information identified?
YES	YES	Daily	Daily

Question 16 Free Text: Do Not Pay Initiative (PIIA Section: 3354(b) (5))

Based on your selection(s) above, provide additional information below. Please note there is a 3000 character limit.

ANSWER:

N/A