

National Archives and Records Administration

Transmittal Memo

DATE: November 8, 2018

TO: Office Heads and Staff Directors

SUBJECT: NARA 260, Food and Drink Near Archival and Records Center Holdings

Purpose: This policy provides guidance for the presence of food and drink near NARA holdings.

Background/significant changes: This policy expands situations in which water may be carried in Federal Records Center (FRC) spaces. Specifically, NARA staff will now be allowed to carry water in spill-resistant containers in Federal Records Center (FRC) storage bays and loading docks when NARA holdings are also present. NARA staff are also allowed to store spill-resistant containers of water in those locations and in processing areas. The expansions of these privileges are meant to keep NARA staff better hydrated, and will improve their working conditions.

Available forms: None.

Canceled policy: Interim Guidance 260-1, Food and Drink Near Archival and Records Center Holdings, dated September 13, 2018.

Canceled forms: None.

Related policies:

- NARA 1562, Integrated Pest Management (IPM) Requirements for NARA Holdings
- NARA 1571, Archival Storage Standards
- NARA 1573, Preservation, Security and Transportation Standards for Exhibition of Original NARA Holdings
- Employee/Occupant Emergency Response Guide for your facility

Effective date: This policy is effective date of signature.

Contact information: For questions on this policy, please contact Allison Olson, Preservation Programs Division, at (301) 837-0678 or [by email](#).

DEBRA STEIDEL WALL
Deputy Archivist of the United States

Attachments

SUBJECT: NARA 260, Food and Drink near Archival and Records Center Holdings

260.1 Policy.

- a. NARA generally prohibits food and drink where holdings are present because food and drink risk damage to NARA's holdings. For the same reason, food and drink wrappers, containers, packaging, and partially consumed food are generally prohibited from those same areas.
- b. Exceptions to the prohibition against food and drink where holdings are present are described in this policy

260.2 Scope and Applicability.

This policy applies to all people who may come into contact with NARA records, including all NARA employees, foundation-funded staff, volunteers, interns, researchers, contractors and subcontractors, and grantees and subgrantees; and to all NARA buildings and facilities.

260.3 Responsibilities.

In addition to the authorities delegated in NARA 101, NARA Organization and Delegation of Authority, the following responsibilities are assigned in order to effectively implement this policy.

- a. **All NARA employees, Foundation employees, volunteers, interns, and contractors working with or having access to holdings** are responsible for properly protecting holdings during use and storage.
- b. **Preservation Programs:**
 - (1) Inspects and advises on holdings damaged by food or drink and takes or oversees appropriate conservation actions.
 - (2) For holdings at Archives I and Archives II, the conservation staff undertakes the review and treatment of damaged holdings.
 - (3) For holdings located in Presidential Libraries, the National Personnel Records Center, and other field components, the Preservation Program Officers consult with appropriate custodial staff concerning the review and treatment of damaged holdings.
 - (4) Provides assistance to NARA units in evaluating preservation risk management considerations related to food and drink and implementing this policy.

c. **Program Offices** implement policies, procedures, and management controls as required by this policy and related directives, developing specific guidance as needed to address internal operating procedures within the Office programs.

d. **Presidential Library directors, Archival directors, Federal Records Center directors, Facilities and Property Management Division (BF) director, and custodial unit supervisor:**

- (1) Ensures that all food and drink are excluded where required by this policy; and
- (2) Helps implement integrated pest management plans for their facility, which includes guidance on proper food and drink handling, use, and disposal.

260.4 Definitions

- a. **Drink.** Any consumable liquid including water, soda, shakes, smoothies, energy drinks, alcohol, coffee, and tea. This includes any beverage container, whether the container is sealed (unopened) or unsealed (open).
- b. **Food.** Any edible substance including sandwiches, frozen meals, and self-prepared items, and snacks such as chips, nuts, fruits, candy, energy bars, and chewing gum. This includes food in containers, whether the container is sealed (unopened) or unsealed (open).
- c. **Pest.** Any unwanted and destructive insect, rodent, bird, or animal. It excludes mold and fungi.
- d. **Spill-resistant container.** A food or drink container that is non-breakable and has a tight-fitting and re-closable lid designed to limit the amount of liquid that is subject to spillage. This does not include screw-top beverage bottles typically sold for single use.

260.5 Prohibition on food and drink.

- a. Food and drink are prohibited (except in the cases described in 260.5.d):
 - (1) At all times in the following locations:
 - (a) Research and reading rooms;
 - (b) Archival storage areas (including stack areas);
 - (c) Federal Record Center (FRC) storage bays, except water as allowed in paragraph 260.5.e;
 - (d) Holdings storage areas (including stacks, specially protected holdings (SPH) storage areas, and artifact storage areas);

- (e) Processing rooms, offices routinely used for processing or research where holdings are frequently present, conservation and reformatting labs, and exhibition prep areas and clean rooms; and
- (f) Exhibit areas when original holdings are on display, or when an exhibit that includes original holdings is being installed or removed.

(2) Whenever holdings are present in the following locations:

- (a) Offices and office areas, including both closed and open offices where there are multiple desks but no walls or workstation dividers;
- (b) Workstations;
- (c) Conference and meeting rooms;
- (d) Staff, volunteer, contractor, and public break rooms and lounges;
- (e) Copy and digitization rooms;
- (f) Loading docks, except water as allowed in paragraph e, and receiving and isolation rooms;
- (g) Exhibition production/fabrication shops;
- (h) Public and common areas of a NARA facility;
- (i) Contractor premises such as audiovisual reformatting companies, digitization facilities, conservation facilities;
- (j) Storage areas of transport vehicles including leased, contracted, or NARA owned shipping trucks and vans; and
- (k) Elevators.

(3) During pull or refile activities (including food or drink carried on the person or placed on a cart). See paragraphs 260.5.e., f., and g. for exceptions.

b. Food and drink are prohibited in those areas to protect the holdings from being damaged as a result of food or drink spills and residues. In addition, food and drink attract insects and rodents and can encourage mold growth, all of which can damage holdings.

c. Before holdings are brought into areas that sometimes have food or drink present, staff must thoroughly clean up all food and drink debris and dispose of wrappers and containers in a manner that ensures that holdings do not come in contact with food and drink or related residue or waste. Food and drink must not be allowed in an area where

holdings are present unless all holdings are first removed from the space. See paragraphs 260.5.e., f., and g. for exceptions.

d. Food and drink should be in a closed container when in hallways and elevators where holdings might be present or when a breakroom is only accessible by walking through a holdings storage or processing area. Do not eat or drink where holdings are present, including in hallways or elevators.

e. There are some exceptions to the food and drink prohibition in Federal Records Center (FRC) spaces:

- (1) Any federal employee, contractor, or volunteer authorized to work in Federal Records Center (FRC) records storage bays and loading docks (hereinafter referred to as "staff") may carry water if it is in a closed, spill-resistant container. This water may only be consumed by someone not actively handling records. For example, water may be consumed when handling boxes on streamliners, pallets, carts, etc., but not when handling individual folders or documents. No other food or beverage is allowed in any FRC spaces when records are present.
- (2) Staff members are responsible for providing their own spill-resistant container, keeping the container closed at all times when not in use, not consuming water when actively handling records, and not placing their spill-resistant container on records or record containers.
- (3) Water container storage stations may be provided in FRC records storage bays, processing areas, and loading docks to give staff the option of temporarily storing their personal spill-resistant water containers. This does not restrict staff from the ability to carry their personal spill-resistant water containers with them as described above.
- (4) Supervisors will communicate to staff the need to adhere to the limits of the exception, the need to report and address any spills in a timely manner, and the overall prohibition regarding other food and drink.

f. There is an exception for "Grab and Go" food and drink supplies:

- (1) Whenever possible, maintain your "Grab and Go" bag or kit containing emergency food and water supplies outside areas where food and drink are prohibited. When this is not practicable or if doing so makes it hard to access in an emergency, discuss alternative locations with your supervisor.
- (2) If a "Grab and Go" bag or kit must be stored in an area where food and drink are normally prohibited, the food and water must be packaged as outlined below to avoid spills and to prevent pests from accessing the food and water:
 - (a) Water must be in a prepackaged, unopened container;

- (b) Non-perishable food must be stored in a prepackaged, plastic or metal container with an airtight seal.
 - (3) For more information about a "Grab and Go" kit, see your facility's Employee/Occupant Emergency Guidelines.
- g. Other circumstances where exceptions may be requested:
 - (1) Discuss individual exceptions based on medical needs with your supervisor or unit manager. Exceptions made for individuals should be documented in writing and maintained in "reasonable accommodation" case files arranged by name of individual.
 - (2) Discuss other requests for exceptions for spaces where holdings are present with Preservation Programs in consultation with the appropriate program office on a case-by-case basis. If approved, the exception must be documented with written protocols describing any agreed-upon mitigating procedures, and the documentation maintained at the facility, program office, and Preservation Programs.
- h. Responding to food or drink spills in prohibited locations and in all locations where holdings are present:
 - (1) Notify your immediate supervisor so that appropriate actions are taken to protect staff from potential slipping hazards and to limit damage to holdings.
 - (2) If the spills come into contact with holdings, supervisors must report the incident to appropriate preservation staff for advice on drying holdings or other needed remediation actions.
- i. All violations of this policy should be reported to your immediate supervisor, even if the violation doesn't involve the unauthorized food or drink spilling or damage to NARA holdings. For instance, finding discarded food wrappers in a location where food is prohibited should be reported.
- j. For questions about how to implement this policy, contact Preservation Programs.
- k. Consequences for violating this policy:
 - (1) Staff who violate this policy are subject to disciplinary and adverse actions, as determined by supervisors and the Office of Human Capital. Failure to comply with provisions of this policy is considered a violation where safety of persons or property is endangered and loss of or damage to Government property occurs. See Interim Guidance 300-40, Discipline and Adverse Actions.

- (2) NARA will suspend or dismiss contractors who fail to observe the policy against food and drink.
- (3) NARA will deny research privileges to researchers who fail to observe the ban on food and drink near holdings.

260.6 Authorities.

44 U.S.C. § 2109, Preservation, Arrangement, Duplication, Exhibition of Records, charges the Archivist, and by extension designated NARA staff, with physically protecting and preserving NARA holdings, and grants them latitude in setting rules and procedures for doing so.

260.7 Public Release.

Unlimited. This policy is approved for public release.

260.8 Records Management.

Records covered by this directive generally fall under three records series. Records created while granting exceptions based on reasonable accommodation are covered by General Records Schedule 2.3, Item 021, Reasonable accommodation employee case files. Records for all other exceptions may be filed either in Program Subject Files (File no. 109) or as email which are covered by General Records Schedule 6.1 Email Managed under a Capstone Approach, as appropriate. Before implementing dispositions, consult the Corporate Records Management Records Paragraph web page for current records disposition instructions applicable to these records.