

National Archives and Records Administration

Transmittal Memo

DATE: August 25, 2022

TO: All Staff

SUBJECT: NARA 1621, NARA Exhibits and Public Programs

Purpose: This directive establishes policy and requirements for exhibits and public programs at NARA. Specifically, this directive (a) establishes accountability for the exhibit and public program decision making process, including approvals; (b) ensures exhibits and public programs are consistent with NARA's purpose, mission, and values, (c) provides guidance on identifying and dealing with sensitive issues or operational risks in exhibits and public programs; and (d) identifies documentation requirements.

Background/significant changes: NARA's exhibits and public programs are primary components of NARA's mission of access to our nation's records, extending our reach to millions of nation-wide visitors and audiences. They bring the nation's history to life and showcase NARA's unique holdings, demonstrating the role that records play in modern life and democracy. They are designed to educate and encourage critical thinking and reflection about history and its effect on current societal issues. Because of the dynamic course of our nation's and government's evolution, and the role that our records play in recording and illuminating that evolution, potentially controversial topics are inevitable components of NARA's exhibition and program content. As such, we should make an effort to evaluate how various audiences may view an exhibit or public program; how it may be interpreted by contemporary society; and how best to accurately and faithfully portray subject matter that may be considered sensitive.

Available forms: None.

Canceled policy: Admin 201, Chapter 13, Public Outreach, Part 5, Public Programs, Sections 7 and 8, dated June 30, 1986

Related policies:

- NARA 1573, Preservation, Security, and Transportation Standards for Exhibition of Original NARA Holdings
- NARA 1612, Exhibition Loans and Traveling Exhibits
- NARA 1702, Transporting Holdings in NARA's Physical and Legal Custody
- NARA 1550, Digitization of Archival Holdings

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Canceled forms: None.

Effective date: This directive is effective the date of signature.

Contact information: For questions regarding this directive, please contact Susan K. Donius at 301-837-1662, or by email.

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National Archives and Records Administration

NARA 1621
August 25, 2022

SUBJECT: Internal Policy Template

1621.1 Policy.

- a. All NARA exhibitions and public programs must clearly reflect or complement NARA's mission, goals, and values.
- b. Exhibit and public program content should be grounded in the historical record and supported by subsequent assessments based on that record, as well as employ accepted educational methods and museum standards, be well organized, and be considerate of the diverse viewpoints and sensibilities of visitors, audiences, and participants.
- c. The National Archives does not alter original records. However, surrogates and surrogate images of records may occasionally be altered for use in exhibitions to facilitate display (as in cropping an image to highlight a specific section, or to draw attention to a section of text). If such alterations are made, they shall be in line with NARA policy and clearly identified and described in the associated text.
- d. Responsibility for developing and presenting exhibits and public programs lies with the Executive for Legislative Archives, Presidential Libraries, and Museum Services (hereinafter "The Executive"). This includes exhibits and public programs developed internally using NARA resources and holdings, as well as those developed with partners outside of NARA. Other NARA offices that would like to develop and present an exhibit or public program must coordinate approval with their Office Executive and the COO.
- e. NARA staff involved in the proposal, planning, development, and execution of exhibits and public programs shall ensure that all processes and content are consistent with NARA's purpose and mission.
- f. While NARA often works cooperatively with its foundations and other interested parties to develop exhibits and public programs, NARA retains final approval for content, design, and presentation.
- g. Offices must make reasonable efforts to identify sensitive issues and operational risks relating to exhibits and public programs, preferably before they arise; and to address concerns once they arise.
 - i. It is especially important to identify sensitive issues or operational risks before agreements or other legally binding documents are executed.
 - ii. See Section 1621.4 for detailed guidance on assessing and addressing sensitive issues and operational risks in exhibits and public programs.
- h. Prior to entering into a legal or financial agreement, Library and Division Directors should consult with NARA's supporting foundations to perform due diligence in identifying and addressing possible conflicts of interest or negative perceptions that may result from sponsors' current or past activities; as well as any concerning content.
- i. Exhibits and public programs that are provided or produced by non NARA sources, or incorporate non NARA sources of scholarship, must clearly state this. In some cases, designation of a NARA staff member, or an external historian, with sufficient knowledge and authority for review and accountability is required. In some instances, NARA may

also post a disclaimer on the exhibit or program if NARA has concerns but chooses to go forward with the exhibit or program.

- j. NARA 1550, Digitization of Archival Records, must be followed when digitizing records for an exhibit or when an entire exhibit is digitized.
- k. Exhibits and public programs may differ in scope, size, duration, platform and potential audience. Thus, the level of planning may vary. However, all exhibits and public programs must have some level of documented planning and formal authorization.
 - i. More rigorous review, documentation, and authorization are required for exhibits and public programs that are:
 - 1. planned for multiple locations,
 - 2. part of a national initiative,
 - 3. produced to be displayed/take place at the National Archives in Washington, DC., or
 - 4. hosted on archives.gov or multiple Presidential Library websites.
 - ii. In addition, exhibits and public programs that meet any of the criteria in paragraph k. (1) a through d, or have been identified as presenting sensitive issues or operational risks (as outlined in Section 1621.4, paragraph a), will generally benefit from input from a broader audience (e.g. NARA management, external experts, stakeholders, and potential audience members) to ensure multiple and potentially conflicting viewpoints are taken into consideration during planning and production.
 - iii. The Museum Program Division (LO) prepares a proposed annual exhibition schedule for the National Archives Museum in Washington, DC. The proposed schedule will be provided to the Archivist of the United States for review and approval through the Executive and the Chief Operating Officer (COO).
- l. Proposals and planning for all exhibits and public programs must document how they support or advance NARA's mission, goals, and values. The signature of an approving official is required to proceed from proposal to planning, and again to proceed from planning to execution (e.g., installation of the exhibit or presenting the public program).
 - i. Proposals and planning for "local" exhibits and public programs (those that do not meet the criteria in paragraph k. (1)) must be approved by the Library or Division Director.
 - ii. Proposals and planning for exhibits or public programs that meet the criteria under paragraph k. (1) must be approved, at a minimum, by the Executive.

1621.2 Scope and Applicability.

This policy covers exhibits and public programs at any NARA facility (including content that comes, in whole or in part, from non-NARA sources) and exhibits or public programs created by NARA, regardless of where they are presented.

- a. Exhibitions include any formally structured public display that includes one or more artifacts, objects, specimens, photographs, illustrations, artworks, digital images, props, and informative textual content related by theme or narrative structure, and any online version of such a display or digital-only presentation incorporating such elements.

- b. Public programs include any lecture, film or audio/visual program, performance, demonstration, family day, festival, and other forms of presentation and learning opportunities provided for members of the general public regardless of where physically presented or if presented or made available online.

1621.3 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. The Archivist of the United States reviews and approves or disapproves all proposals for exhibits and public programs dealing with sensitive issues that are elevated to them.
- b. The Chief Operating Officer:
 - i. Directs formal and informal reviews of exhibits and public programs when sensitive issues or operational risks are identified.
 - ii. May periodically review (or assign an individual or group to do so) exhibit and public program directives, policy, and standard operating procedures.
- c. Executive for Legislative Archives, Presidential Libraries, and Museum Services:
 - i. Informs the COO of any sensitive issues or operational risks that have been raised to them. Provides the COO with a written proposal for addressing identified sensitive issues or operational risks.
 - ii. Periodically reviews office or unit level SOPs to (a) ensure they are consistent with agency-wide policy and (b) identify and make any necessary revisions.
- d. Director for the Office of Presidential Libraries
 - i. For exhibits or public programs elevated by Library Directors because of the potential of sensitive issues or operational risks, reviews written evaluations provided by Presidential Library Directors and submits them with recommendations to the Executive for further evaluation.
 - ii. Ensures that the Presidential Library Directors comply with agency wide policy regarding exhibits and public programs.
- e. Presidential Library Directors and Director of Museum Programs:
 - i. Evaluates proposals for exhibits and public programs at their facilities or conducted by their staff. Approves the proposal if it aligns with NARA's purpose, mission and values and no sensitive issues or operational risks are identified. Monitors the planning and execution of the exhibit or public program to ensure it adheres to the proposal and continues to evaluate whether sensitive issues or operational risks arise.
 - ii. During the proposal or planning stage, documents sensitive issues or operational risks, and evaluates them in writing. Provides the written evaluation, including options for addressing sensitive issues or operational risks for further evaluation. Activities directly related to or impacted by the sensitive issue or risk will be stopped until the issue or risk is resolved.
 - 1. Presidential Library Directors will provide written evaluations to the Director for the Office of Presidential Libraries.

2. The Director for the Museum Programs Division will provide written evaluations to the Executive.
- f. Managers and Supervisors:
- i. Participate in the proposal and planning of exhibits and public programs.
 - ii. Solicit the views of NARA staff and other parties, as appropriate, to identify potential sensitive issues or operational risks.
 - iii. Elevate sensitive issues or operational risks to the Library Director or Director of Museum Programs, in writing, for further evaluation.

1621.4 Handling Sensitive Issues and Operational Risks in NARA Exhibits and Public Programs

- a. NARA staff are expected to make reasonable efforts to identify concerns about sensitive issues a. or operational risks throughout the proposal, planning, or execution of an exhibit or public program, and alert their supervisors about such concerns.
- i. Sensitive issues are issues about which stakeholders and/or the public may question or disagree on substantive grounds (emotional, cultural, and/or political) with the presentation or content of an exhibition or public program. Sensitive issues can take the form of current events that arouse strong competing views or are emotionally charged, controversial topics (topics in which different stakeholder views could be in conflict), or new information that may alter long standing or commonly accepted interpretations.
 - ii. Operational risks are legal, financial, or other risks unrelated to the programmatic content of the exhibit which could result in NARA being responsible for losses or damages that are considerable or that could significantly negatively impact NARA's reputation. Examples of operational risk may include:
 1. Significant financial liability (e.g., insurance requirements for high value objects on loan or indemnification requirements).
 2. Gaining the proper approval for authority to commit agency funds, including trust/gift funds, for exhibits or public programs.
 3. Decisions or actions that could subject NARA to potential litigation or Congressional investigation.
 4. Safety concerns for visitors or about a particular installation.
 5. Matters of problematic provenance or issues of institutional ethics.
- b. The supervisor will present the concerns to the Presidential Library or Division Director.
- i. The Presidential Library or Division Director will conduct an initial review, in light of identified concerns, and decide on one of the following approaches among sub-paragraphs (1), (2), or (3).
 - ii. If the Presidential Library or Division Director does not believe the exhibit or public program involves a sensitive issue or poses an operational risk, they may proceed with the exhibit or program as planned after documenting the concern and their decision to proceed in a memorandum for the record.
 - iii. If the Presidential Library or Division Director determines the sensitive issue or operational risk is too great, they may decide not to pursue the exhibit or public

- program. However, if funds have already been obligated or spent, or legally binding agreements have been signed, the Presidential Library or Division Director must consult the appropriate NARA official, as noted below, before making any final decision. Presidential Library Directors should consult the Director for the Office of Presidential Libraries, who will then consult the Executive. The Director of the Museum Programs Division should consult the Executive.
- c. If the Presidential Library or Division Director believes that the exhibit or public program involves a sensitive issue or poses an operational risk to NARA, and they want to proceed with the exhibit or public program, they will develop a written proposal to address the identified concern.
- i. The Presidential Library or Division Director will submit their proposal addressing identified sensitive issues or operational risks to the appropriate NARA official, as noted below. Presidential Library Directors should submit a written proposal to the Director for the Office of Presidential Libraries, who will review and provide to the Executive. The Director of the Museum Programs Division should submit a written proposal to the Executive. The Executive will consult with the COO to determine if additional action, such as a formal review, is necessary before proceeding.
 - ii. If necessary, the COO will establish a formal review committee consisting of senior NARA staff and subject matter experts. The committee will carry out an expedited review of the matter under the direction of the COO to determine if any additional measures are required, including, but not limited to, recommended modifications to the exhibit or public program (which may include additional contextual information around an exhibit that may be deemed controversial or sensitive) and prepared responses to anticipated questions from the public or news media.
 - iii. The review committee will submit a report to the COO with recommendations.
 - iv. In consultation with the Archivist and Deputy Archivist, the COO will provide guidance to the Executive regarding how to proceed.

1621.5 Authorities.

- a. 44 U.S.C. § 2104(a) authorizes the Archivist to prescribe regulations, orders, and directives as the Archivist deems necessary to carry out the Archivist's and the agency's functions.
- b. 44 USC § 2109 authorizes the Archivist to create and present exhibits.
- c. 44 U.S.C. §2112(c) authorizes the Archivist to exercise their exhibit authority with respect to presidential libraries.

1621.6 Public Release.

Unlimited. This directive is approved for public release.

1621.7 Records Management.

Most records created or maintained in following this direction are covered by records schedules in Chapter 16 of the NARA Records Schedules and some are permanent records. Contact Corporate Records Management (CM) prior to implementing any disposition to confirm the most recent retention and disposition authority.