

National Archives and Records Administration

Transmittal Memo

DATE: August 25, 2022

TO: All Staff

SUBJECT: NARA 1702-S1, Transporting Holdings in NARA's Physical and Legal Custody

Purpose: This supplement provides requirements and procedures on how to select and implement the appropriate methods of transport for NARA holdings.

Background/significant changes: Guidance on acceptable methods of transporting NARA holdings previously provided in Supplement B of NARA 1573, Preservation, Security, and Transportation Standards for Exhibition of Original NARA Holdings and NARA 1702, Transporting Holdings in NARA's Physical and Legal Custody, specifically paragraph 1702.10, was inconsistent. This guidance is the single authority for acceptable methods of transporting NARA holdings and therefore replaces Supplement B of NARA 1573 and paragraph 1702.10 in NARA 1702.

This supplement establishes two categories of specially protected holdings (SPH) for transport decision making purposes only:

- **Tier 1 SPH** are items of national historical significance or cultural sensitivity; and
- **Tier 2 SPH** are all other SPH that do not meet Tier 1 criteria.

The supplement provides different transportation requirements for each tier. This supplement also specifies new procedures and forms for coordinating the transport of specially protected holdings and the transport of any holdings internationally with the Holdings Protection and Recovery Staff (CH).

Available forms: NA-16015, Holdings Movement Support Request.

Canceled forms: None.

Canceled policy: This supplement cancels Supplement B in NARA 1573 and paragraph NARA 1702.10 in the NARA 1702 policy.

Related policies:

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- See NARA 202 for additional requirements regarding the transport of classified NARA holdings.
- See NARA 702 for procedures when NARA purchases transport services.
- See NARA 1702-1 for procedures on freight transport of records and holdings in NARA's legal or physical Custody
- See NARA 1612 for additional information regarding Exhibition Loans and Travelling Exhibits.

Effective date: This supplement to NARA 1702 is effective on the date of signature.

Contact information: For questions on this guidance, please contact Chris Naylor, Office of the Chief Operating Officer (COO), via email at chris.naylor@nara.gov.

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Deputy Archivist of the United States

National Archives and Records Administration

NARA 1702 Supplement 1
August 17, 2021

SUBJECT: NARA 1702-S1, Transporting Holdings in NARA's Physical and Legal Custody Internal Policy Template

This supplement outlines the acceptable methods for transporting holdings in NARA's physical and legal custody and provides guidelines for selecting and applying these methods. See NARA 202, NARA Classified Information Security Program, for additional requirements regarding the transport of classified NARA holdings.

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PART I – OVERVIEW

1. Summary of When to Use Each Transport Method

- a. Fine Arts Exclusive** is primarily used for ground transport of any of the following:
 - i.** Tier 1 Specially Protected Holdings (SPH), [Tier 1, meaning items of national historical significance or cultural sensitivity], or
 - ii.** Extremely fragile items.

- b. **Fine Arts Shuttle** is primarily used for ground transport of any of the following:
 - i. Tier 2 SPH (Tier 2, meaning all items designated as SPH by the custodial unit that do not meet the criteria above for exclusive use);
 - ii. Non-SPH items when shipment involves multiple holdings, large objects, or single crates (and when this is the most cost effective and safest method); and
 - iii. Holdings that are environmentally sensitive or vulnerable to mishandling.
 - c. **Hand Carry** via Plane or Train is primarily used if timely fine arts carrier services are not available. Exceptions to allow hand carry outside the local area are made on a case by case basis, with Chief Operating Officer (COO) approval.
 - d. **Local Travel Vehicle Courier** is primarily used when holdings (including SPH) are being transported locally and can safely be transported by couriers using a NARA or other government owned vehicle, or taxi, or rental vehicle (personally owned vehicle use is prohibited).
 - e. **Package Delivery Service** with 24-hour tracking service is primarily used for domestic shipment of non-fragile holdings that are not SPH or of high value.
 - f. **Air Freight** is primarily used for holdings (including SPH) that must travel long distances and cannot be accommodated via Fine Arts ground services—exclusive use or shuttle—especially when shipped outside the United States.
 - g. **Ground Freight** is primarily used for transport of large quantities of non-SPH holdings including multiple boxes or containers crated or palletized for transport. (See NARA 1702-1 for guidance on Freight Transport.)
 - h. **International Transport** may involve more than one method of transport listed above as well as additional security and customs requirements.
2. **Tiered Categories and Other Considerations for SPH and other Sensitive Holdings**
- The options for shipping SPH and other high value or especially fragile holdings are narrower, and require higher levels of security and coordination in order to provide suitable protection.
- a. SPH Tiers - There are two types of SPH that need to be considered for transport decision making purposes – Tier 1 and Tier 2.
 - i. **Tier 1** includes holdings of iconic or highest historical or national significance or cultural sensitivity. Loss of or damage to these holdings would constitute a major loss to the nation and the National Archives.
 - 1. Examples of items in Tier 1 may include:
 - a. Louisiana Purchase
 - b. Emancipation Proclamation
 - c. Treaty of Paris
 - d. FDR’s Day of Infamy Speech
 - 2. Transport holdings in this category via fine arts shipper using an exclusive use vehicle. Tier 1 holdings may require additional security measures, determined on a case-by-case basis.
 - 3. NARA does not use a monetary value scale to determine the transport method. Nevertheless, holdings of very high monetary

value, even if they do not have the intrinsic characteristics to merit “Tier 1” status, may also be appropriate for exclusive use transport (e.g., the Replica of Fort Al-Masmak—a 24-karat gold, 200 lb sculpture).

- ii. **Tier 2** includes all items that the custodial unit designates as SPHs that do not meet the criteria above for exclusive use.
 1. Examples of items in Tier 2 are:
 - a. Holdings containing signatures or handwriting of a sitting or former president or first lady, prominent politician, head of state, celebrity, or cultural or social figure;
 - b. Prominent gifts from heads of state;
 - c. Artifacts featuring exceptional craftsmanship;
 - d. Artwork by high-profile or historically significant artists;
 - e. Jewelry containing valuable metals and/or rare gems;
 - f. Famous patents; and
 - g. Firearms (transport of firearms must be coordinated with BX in advance).
 2. Transport holdings in this category via a fine arts shuttle.
 3. Transport may require additional security measures (such as last on, first off, where available). Consult with the Holdings Protection and Recovery Staff (CH) on a case-by-case basis.
- b. Refer to NARA 1572, Supplement 2 for additional SPH guidance.
- c. All items designated as Vulnerable & Valuable (V&V) within the Presidential Libraries are SPHs.
- d. The Holdings Protection and Recovery Staff (CH) must create a transport security plan before any transport of SPH or the transport of any NARA holdings internationally.
 - i. The transport security plan includes an itinerary and any other information needed to track the holdings during transport. Any call in requirements for holdings couriers or drivers will be included in the transport security plan.
 - ii. Program offices must request the creation of a transport security plan by submitting an NA-16015, Holdings Movement Support Request, to CH via holdingsprotection@nara.gov, within the time frames described in this supplement. All time frames are calendar days.
 - iii. CH may assist program offices in determining whether an SPH item is Tier 1 or Tier 2. In cases of disagreement, the final decision will be made by the COO in consultation with CH and the Program Executive.

PART II. FINE ARTS SHIPPING

1. Summary of When to Use Fine Arts Shipping

- a. A fine arts shipper (or carrier) is a company that provides secure transport, specialized handling and related services (e.g., exhibit installation, courier,

crating) tailored for art, antiques, cultural heritage, or other valuable or sensitive materials.

- b. Use of fine arts shipping services is the preferred method for all of the following:
 - i. Transporting SPH:
 - 1. Outside of the local area (should be used in lieu of hand carry whenever possible); or
 - 2. Inside of the local area when services or vehicles beyond what can be provided by NARA vehicle and staff are needed.
 - ii. Transporting non-SPH outside of the local area when the shipment involves multiple holdings, large objects, or single crates, and it is the most cost effective method.

2. Summary of When to Use Fine Arts Shipping

- a. **Definition:** A service where a fine art carrier picks up and delivers a single institution's materials "exclusively" according to the customer's specifications.
- b. **Primarily Used for:** Ground transport of Tier 1 SPH, with limited exceptions.
- c. **Number of NARA Couriers:** 0 (1 in special instances)
- d. **Requirements and Procedures:**
 - i. Arrange exclusive use services with specialized vendors that can assure appropriate and continuous fine arts-grade security and conditions.
 - ii. Specify and confirm the following minimum requirements at the time of procurement:
 - 1. Air ride suspension on the vehicle;
 - 2. Availability of climate controlled conditions (consult with staff in Preservation Programs Division (RX));
 - 3. 24 hour GPS tracking by the shipper; and
 - 4. Dual-driver "non-stop" service. Non-stop service, under US Department of Transportation regulations, requires drivers to adhere to strict service hours and take regular breaks and generally means minimal rest stops and at least one driver must be with the vehicle at all times.
 - 5. Procedures for locking and sealing the cargo area.
 - iii. Carrier must provide two approved drivers. An approved driver is one who has either been vetted by NARA security or by a fine arts shipper or other transport company with established vetting procedures. Drivers must provide adequate strapping, bars, and padding to secure and protect containers from shifting and lock all trailer doors to protect contents from unauthorized access or tampering.
 - iv. A courier or security escort may be required to accompany the shipment. Notify the carrier at the time of securing services if a courier or security escort will be included, if drivers will be subject to NARA call-in requirements, or if any special docking or other requirements need to be accommodated.

- v. As early as possible, but at least five days before intended transport date of any SPH, submit a completed NA-16015, Holdings Movement Support Request, to CH in order to develop a transport security plan. Submit the final shipment itinerary/route and driver's names and contact information at least within 48 hours before shipment, to be included in the transport security plan.

3. Fine Arts Shipper - Shuttle

- a. **Definition:** A service, also defined as “less than truck-load lots” (LTL), where a fine arts carrier picks up materials from multiple institutions and delivers them locally under no specific time or route restrictions according to pre-established security, handling and other conditions, making multiple stops along the way. Where longer distances are involved, materials are typically warehoused and consolidated onto regularly-scheduled cross-state shipments.
- b. **Primarily Used for ground transport of any of the following:**
 - i. Tier 2 SPH, with limited exceptions;
 - ii. Non-SPH items when shipping multiple holdings, large objects, or single crates, and when this is the most cost effective method; or
 - iii. Holdings that are environmentally sensitive or vulnerable to mishandling.
- c. **Number of NARA Couriers:** 0
- d. **Requirements and Procedures:**
 - i. Arrange for fine arts shuttle services only with established, specialized vendors that can assure:
 - 1. Appropriate and continuous security;
 - 2. Door-to-door handling, and climate control conditions, including any phases of cross-docking (i.e., moving cargo between vehicles) or warehousing; and
 - 3. 24-hour GPS tracking.
 - ii. Ensure carriers provide two approved drivers and one must be with the vehicle at all times.
 - iii. Request last on, first off (LOFO) and/or expedited use services when extra protection is desired, but these add-on services may not always be available for all carriers or itineraries.
 - 1. LOFO is an extra service where a single customer's materials are picked-up last and delivered first with no stops between pick-up and delivery. This service typically requires an additional fee.
 - 2. Expedited use is an enhancement to shuttle service in which the shipper specifies a certain finite range of dates during which the shipper loads a single customer's shipment as well as other freight on the vehicle and transports the shipment without additional stops to load and unload cargo. Each shipment has a reserved space and is not moved during transport.
 - iv. Seal individual containers containing NARA holdings to protect against tampering.

- v. As early as possible, but at least five days before the intended transport date of SPH, submit to CH a completed NA-16015, Holdings Movement Support Request, in order to develop a transport security plan.

PART III – OTHER METHODS OF TRANSPORT

4. Hand Carry via Plane or Train

- a. **Definition:** Transport of holdings by NARA approved couriers aboard a common carrier airline or rail service in which the holdings remain in the physical custody of the NARA couriers at all times.
- b. **Primarily Used** for transport of holdings if all of the following are met:
 - i. Suitable or timely fine arts carrier services are not available;
 - ii. Items can be safely stored in a container that can be hand carried; and
 - iii. The COO has pre-approved an exception request. Program Executives must submit exception requests to the COO for a case by case determination.
- c. **Number of NARA Couriers:**
 - i. 2 for SPH/Especially Fragile; and
 - ii. 2 (1 with COO exception) for holdings not SPH or not Especially Fragile
- d. **Requirements and Procedures:**
 - i. Volume of packed holdings must be small enough to be secured under a passenger seat in the orientation in which they were packed.
 - ii. Pack the holdings in a container that protects holdings from being dropped, crushed by other packages, subjected to vibration from travel, and damaged by food or drink.
 - iii. Confirm with the airline what the under seat dimensions are on the flight that is being booked to ensure that the container will fit under seat.
 - iv. Use business class seating, whenever possible, when accompanying SPH, highly valuable, especially fragile, or otherwise vulnerable holdings to provide adequate storage room for the holding and to expedite entry onto and exiting the plane.
 - v. Couriers must travel the most direct route possible and keep holdings in their possession at all times. Whenever possible, air transportation must be direct from point to point with no layovers or change in planes or trains.
 - vi. Storage of container in overhead bins or on passenger seats is not allowed.
 - vii. Couriers must pre-board, whenever possible, to ensure safe entry and placement of containers as well as to ensure couriers have adjoining seats.
 - viii. Couriers may not consume alcohol while transporting NARA holdings.
 - ix. In instances when the COO has pre-approved a single courier to travel by train or airplane, a second person must accompany the courier while in transit to and from the point of departure/arrival or until the courier clears security checkpoints to ensure that NARA holdings are never left unattended.
 - x. Before departure, couriers must complete the online NARA holdings courier training and staff at facilities with exit inspections must follow

procedures for use of a Holdings Steward Permit (see NARA 211, Property Exit Inspections).

- xi. As early as possible, but at least five days before the intended transport date of SPH, submit to CH a completed NA-16015, Holdings Movement Support Request, in order to develop a transport security plan.

5. Local Travel Vehicle Courier

- a. **Definition:** Local travel transport of NARA holdings by NARA approved couriers using a NARA or other government owned vehicle, rental vehicle, or taxi (personally owned vehicle use and rideshare services are prohibited).
- b. **Primarily Used for:** Holdings (including SPH) transported locally and can safely be transported by NARA approved couriers.
- c. **Number of NARA Couriers:** 2
- d. **Requirements and Procedures:**
 - i. Use a NARA/government owned vehicle for ground transportation. If not available, then a rental vehicle should be used. A taxi may be used in limited circumstances where no other transport options are available or the NARA/government vehicle has been delayed.
 - ii. Travel must be less than twelve hours duration within the same calendar day and must not require the purchase of a common carrier ticket or require lodging while the courier has custody of NARA holdings.
 - iii. Couriers must:
 - 1. Travel the most direct route possible and keep holdings in their possession at all times.
 - 2. Communicate via cell phone or other wireless technology in the event of an emergency, to confirm directions or arrival time.
 - 3. Include two individuals authorized by NARA (at least one should be a NARA employee). Both couriers should be in the vehicle. One of the couriers may be the driver.
 - iv. When using vehicles to transport holdings, avoid incompatible loads that could harm or soil holdings and their containers. Keep the vehicle interior clean and free of dirt, soil, food, and all liquids.
 - v. Pack the holdings in a container that protects holdings from being dropped, crushed by other packages, subjected to vibration from travel, and damaged by food or drink.
 - vi. Secure the holdings in the vehicle so that they do not shift and are protected in case of a sudden stop or impact. If needed, utilize seatbelts, straps, netting, or other fasteners to help secure the items during transport. Consult with RX with any questions regarding appropriate packing methods or materials.
 - vii. Vehicle must have sufficient fuel to reach the planned destination without a fuel stop whenever feasible.

- viii. At least five days before the intended transport date of SPH, submit to CH a completed NA-16015, Holdings Movement Support Request, in order to develop a transport security plan.
- ix. Before departure, couriers must complete the online NARA Holdings Courier training and staff at facilities with exit inspections must follow procedures for use of a Holdings Steward Permit (see NARA 211, Property Exit Inspections).
- x. Do not use the NARA Shuttle for transport of Tier 1 SPH or extremely fragile items between Archives I and Archives II. The NARA Shuttle is acceptable for transport of small volumes of Tier 2 SPH and non-SPH NARA holdings by two NARA couriers between Archives I and Archives II as long as the holdings can be safely hand carried and are packed in a closed container that will protect the items during transport. The items must remain under the control of the couriers during the entire shuttle ride.

6. Package Delivery Service with 24-hour Tracking Service

- a. **Definition:** A service provided by postal systems, private courier companies, and “less than truckload” shipping carriers to deliver shipping containers, parcels, or high value mail as single shipments.
- b. **Primarily Used for** domestic shipment of non-fragile holdings that are not SPH or of high monetary value. Holdings must be in good physical condition and not vulnerable to environmental extremes, shock or vibration, including those produced by conveyor belt handling.
- c. **Number of NARA Couriers:** 0
- d. **Requirements and Procedures:**
 - i. Only use NARA-approved overnight package delivery carriers.
 - ii. Package delivery shipments must comply with the following requirements:
 - 1. Use “Next Day Air” or equivalent overnight options only;
 - 2. Do not ship items (or schedule to arrive) over weekends or Federal holidays;
 - 3. The unit shipping the records must include a list of the contents at the appropriate level (e.g., box or folder title list for boxes of records or item list for artifacts and individual documents) with the shipment and transmit it to the receiving office via email or fax in advance;
 - 4. The shipping and receiving offices must both actively track the shipment; and
 - 5. The receiving office must confirm with the shipping office that everything was properly received (not just the box(es) or envelope(s) but the actual records/artifacts) upon receipt.
 - iii. Pack holdings securely to prevent the contents from moving or shifting inside the container, and to protect against water infiltration. Packaging must be able to cushion holdings if container is in any orientation. If contents must travel flat or in a specific orientation, package service is not

a suitable option. Contact RX regarding appropriate packing methods or materials.

- iv. Immediately report any anomalies (e.g., damaged boxes, delayed deliveries, missing items) to the supervisor and CH via holdingsprotection@nara.gov.

7. Air Freight

- a. **Definition:** Direct booking with an airline company for the transport of containerized materials.
- b. **Primarily Used for:** Any NARA holdings that must travel long distances and cannot be accommodated via package delivery service with 24 hour tracking or Fine Arts ground services—exclusive use or shuttle—especially when shipped outside the United States.
- c. **Number of NARA Couriers:** 1 courier on the airplane
- d. **Requirements and Procedures:**
 - i. Consider booking air freight, or coordinated air freight and ground services through a fine arts carrier, or a dedicated freight forwarder.
 - ii. Understand the particular modes and routes of transportation involved in the specific air freight shipment, and then plan carefully to minimize stopovers and plane changes to prevent unnecessary loading and unloading or leaving an unattended crate at the loading dock.
 - iii. Consider and plan for TSA crate screening procedures which will likely involve opening and inspecting crate/contents. Note that some fine arts carriers provide certified TSA pre-screening, overnight storage and escort services.
 - iv. Consider pressure differences between ground and flight level that may affect pressure-sensitive objects.
 - v. Crate or pack NARA holdings to provide security and to prevent moisture infiltration into the container. Provide adequate padding to absorb vibration and shock, and stabilize relative humidity if required. Crate size may be limited by airplane freight hold configuration. Weight and dimension of the container normally determine air shipment charges.
 - vi. The courier must ensure that the shipment is safely loaded and unloaded which may require assistance from airline and/or customs personnel. The services of a certified customs broker or freight forwarder are needed to accompany or view containers beyond certain load checkpoints.
 - vii. The courier must fly as a passenger on the plane transporting the holdings as air freight. Two couriers are required for transport to and from airport, but only one courier is required on the flight carrying NARA holdings as air freight.
 - viii. Consider Business Class on a case-by-case basis when it is necessary to expedite exit off the plane to retrieve the NARA holdings.
 - ix. As early as possible, but at least five days before intended transport date, alert CH to any transport of SPH by submitting a completed NA-16015,

Holdings Movement Support Request, in order to develop a transport security plan.

8. Ground Freight (Whole truckload services)

- a. **Definition:** Exclusive use “whole truckload” services booked with a common carrier as opposed to an established fine arts carrier.
- b. **Primarily Used for:** Transport of large quantities of non-SPH holdings, including multiple boxes or containers crated or palletized for transport.
- c. **Requirements**
 - i. Follow Interim Guidance 1702-1, Freight Transport of Records and Holdings in NARA’s Legal or Physical Custody.
 - ii. Consider use of a fine arts carrier or the specialized logistics division of a general services carrier.
 - iii. A performance work statement (PWS) may be required if palletization or other services beyond direct on/off loading are involved.
 - iv. Consult NARA 702 for shipping procurement procedures.

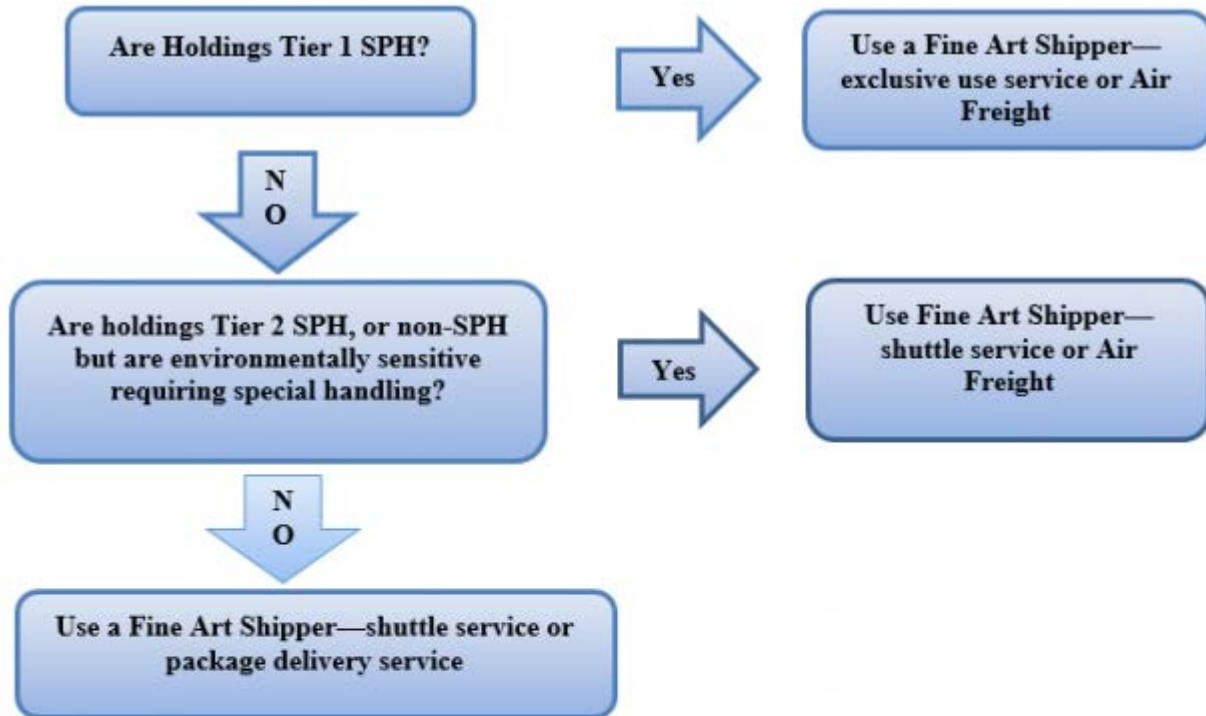
PART IV. INTERNATIONAL TRANSPORT

International transport of NARA holdings can be much more complex than domestic transport as it may involve more than one method of transport as well as additional security and customs requirements. Generally, the existing protocols defined for transport methods detailed in this supplement still apply, but the decisions on how to best combine and coordinate methods for a multi-stage transport scenario must be addressed on a case-by-case basis. Follow the requirements and considerations listed below when planning for international shipments:

1. All protocols outlined for domestic transport still apply, but with additional considerations.
2. At least three months in advance of intended transport, notify the program executive of the request to transport NARA holdings internationally, including a description of the holdings, reason for international transport, and the method of transport. If the program executive supports the request, she or he will submit the request to the COO, who will coordinate with the Archivist/Deputy Archivist to make a final approval decision.
3. At least 30 days before the transport of any NARA holdings internationally,
 - a. Submit a completed NA-16015, Holdings Movement Support Request, to CH in order to develop a transport security plan, and
 - b. Contact RX to coordinate transport details to ensure compliance with preservation standards.
4. Additional approvals and procedures pertaining to travel booking and certifications (both for travelers and containers/content) will apply, including personal travel approval by the Archivist or Deputy Archivist, and will require additional advance time to resolve.
5. TSA requirements are different and more extensive than those associated with domestic travel in most cases, and will require additional planning and coordination, including for the design and materials of packing and containers, and timeframes for approvals and screening, and completion of customs paperwork.
6. Coordinate all transport arrangements (i.e., ground and air bookings, connections, handling, customs and other services) through a certified international freight forwarder,

fine arts carrier, and/or customs broker that is experienced with international transport, whenever possible.

PART V: DECISION TREE FOR TRANSPORTING SPECIALLY PROTECTED HOLDINGS OUTSIDE OF THE LOCAL AREA



***If transporting holdings within the local area (i.e., local travel) you may use the methods outlined above or holdings may be hand-carried by two NARA approved couriers.**

****Hand-carrying of holdings outside of the local area will be considered in limited instances with COO approval. Program Executives must submit exception requests to the COO. See supplement for further details.**

*****For international transport see international shipments section in this supplement for further details.**