



OFFICE *of*
INSPECTOR GENERAL

Date : July 19, 2013

Reply to

Attn of : Office of Inspector General (OIG)

Subject : Audit Memorandum No. 13-10: NARA Archival Facilities

To : David S. Ferriero, Archivist of the United States

The National Archives and Records Administration (NARA) Office of Inspector General completed an audit of NARA's Preservation Program. The objectives of the audit were to determine if (1) recommendations in the *Evaluation of NARA's Preservation Program* (OIG Audit Report No. 05-13, dated June 2005) were adequately implemented; and (2) program controls were adequate in order to meet the mission of preserving Federal records. On July 9, 2013, the OIG issued *Audit of NARA's Preservation Program* (OIG Report No. 13-08). The report outlined deficiencies (including the issue discussed in this report) that significantly affect NARA's ability to fulfill its mission of safeguarding and preserving essential and important records of our Federal Government. This audit memorandum focuses on the results related to NARA's archival facilities. Originally this issue was presented as a part of the *Audit of NARA's Preservation Program* (OIG Report No. 13-08), but the Chief Operating Officer requested it be separated from the original report to allow the agency to focus on the preservation and archival facilities issues separately. Therefore, we chose the audit memo format to report the issue¹.

NARA 1571, *Archival Storage Standards (Standards)* establishes structural, environmental control, fire safety, preservation, and security standards for appropriate archival storage conditions in NARA archival facilities. NARA applies the requirements in the *Standards* to all NARA archival facilities, which is above and beyond the intention of the directive. The directive is only applicable to (1) all new NARA archival facilities occupied by NARA on or after October 1, 2001 and (2) existing NARA archival facilities when they are renovated or otherwise significantly modified to the extent feasible and financially practicable.

¹ An audit memorandum is used when an audit is performed and there are either no findings or minimal findings identified.

During this audit we examined the *Standards*, met with representatives from the Preservation Programs Division (RX), and reviewed data from the Performance Measurement and Reporting System (PMRS). Based on our review some archival facilities (including facilities occupied prior to October 1, 2001) may not be in compliance with the *Standards*. NARA's failure to comply with the *Standards* could lead to premature deterioration of records due to inadequate record storage environments. Our finding is presented in detail in Appendix A.

This audit was conducted in accordance with generally accepted government auditing standards between March 2012 and January 2013. These standards require 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.

As with all OIG products, we will determine what information is publically posted on our website from this Memorandum. Should you or management have any redaction suggestions based on FOIA exemptions, please submit them to my counsel within one week from the date of this letter. Should we receive no response from you or management by this timeframe, we will interpret that as confirmation NARA does not desire any redactions to the posted report.

Should you have any questions concerning this report, or require additional information, please contact me at (301) 837-3000.



James Springs
Acting Inspector General

Appendix A – Audit Results

Some Archival Facilities may not be in compliance with Archival Storage Standards

Based on our review of PMRS and interviews with RX, a number of archival facilities holding archival records may not meet archival storage standards². This condition exists because NARA 1571 compliance reviews of each of the facilities have not been completed by RX. The *Standards* establish environmental conditions to help achieve the maximum life expectancy of textual records stored in the regional archives system. It also establishes structural, environmental control, fire safety, preservation, and security standards for appropriate archival storage conditions in NARA archival facilities. NARA's failure to comply with the *Standards* could lead to premature deterioration of records due to inadequate record storage environments.

NARA's FY 2004 Performance and Accountability Report stated by 2009, 100% of NARA's archival holdings would be in appropriate space. At the end of FY 2009, only 70% of archival holdings were in appropriate space. Although 30% of archival holdings were still not in appropriate space, the FY 2011 PAR, stated by 2016 100% of archival holdings would be stored in appropriate space.

During this audit we inquired with the Director of RX about which archival facilities were not compliant with the *Standards*. We were directed to the *percentage of archival holdings stored in appropriate space* target metric within PMRS. This target metric is a measure of the quality of NARA's archival records space. According to PMRS, at the end of FY 2012, 94% of traditional holdings and 40% of artifact holdings were in NARA 1571, *Archival Storage Standards* appropriate space. The archival facilities not compliant with the *Standards* according to PMRS were:

² In the 2005 audit report, *Evaluation of NARA's Preservation Program* (OIG Audit Report 05-13), we noted a number of archival facilities holding archival records did not meet archival storage standards.

Table 1: Non-compliant archival facilities

Archival Facility	Artifacts	Traditional Holdings
Eisenhower Library	X	
Roosevelt Library	X	X
Ford Library	X	X
George W. Bush Library	X	X
Truman Library	X	X
Hoover Library	X	X
Carter Library	X	
Johnson Library	X	X
Reagan Library	X	
St. Louis		X
Denver		X
Philadelphia		X
San Bruno		X

According to the Director of RX, Business Support Services and RX are visiting each archival facility using a checklist that addresses each element of the *Standards*. As a part of the visits, non-compliant areas will be identified along with mitigating strategies that have been implemented by some facilities. Until these visits are completed, the Director was not sure about the accuracy of the list of non-compliant archival facilities, but stated there may be some adjustments to the current metric numbers based on the visits. The Director did not provide a timeframe for when the visits or checklists would be completed or when the archival facilities would be in compliance.

In March 2013 the Director of RX provided an update on the NARA 1571 reviews (See Appendices B and C for spreadsheets provided by RX outlining Regional archival facilities and Presidential Libraries compliance with the *Standards*). Based on our review of the spreadsheets, many of the archival facilities are not in compliance with the *Standards*. Although the Director of RX indicated many archival facilities had elements of the *Standards* that were in process of being reviewed or in the process of being made compliant, she could not state as to whether the facilities were compliant. Additionally, the Director could not confirm whether the data reported for the target metric is accurate. As stated previously this metric reports 94% of traditional holdings and 40% of artifacts are stored in compliant space, which is contradictory to the information in presented to the OIG (Appendix B and C). Until all archival facilities can comply, records maintained at the facilities are at risk for premature deterioration because of inadequate records storage environments and harmful contaminants.

Recommendation

The Chief Operating Officer should ensure:

- a) A comprehensive review of the *Standards* is completed. Additionally, roles and responsibilities for offices involved in the execution of the directive are clearly defined.
- b) A plan is developed, including a timeline, for when the archival storage facility reviews will be completed. As a part of the reviews, identify facilities with (1) areas of non-compliance, associated costs, risk if the actions are not completed, and an action plan, (2) structural, environmental control, fire safety, preservation, and security deficiencies that could be severe enough to permanently damage records.
- c) An accurate listing of facilities currently non-compliant with the *Standards*, along with the area of deficiencies is identified and communicated.
- d) Resources needed to make all archival storage facilities compliant by 2016 are identified. If the facility cannot be brought into conformance with the *Standards*, determine and document what mitigating actions have been or will be taken to minimize threats to the holdings.
- e) PMRS is updated to accurately reflect percentage of archival holdings in appropriate space.

Management Response

Management concurred with the recommendation.

Appendix B –Presidential Libraries NARA 1571 Compliance (as of March 2013)³

Compliant
 Non-Compliant
 Project or Review in progress/Near Compliant

Facility	Location	Ownership / Date	BCR Date	Structural Standards 1571.6: B	Water Damage 1571.7: B and RX	HVAC Design 1571.8 and 1571.11: B and RX	Environmental Conditions 1571.9 (T&RH) & .11 (pollutants): RX	Finishes and Materials 1571.12 - .15: RX	Lighting 1571.16: RX	Fire Safety and Security 1571.18 – 21: B	Facility Operation & Surveys 1571.22-.23: B, RX, LP	Other 1571.24: LP
Hoover	West Branch	NARA facility	2013	B	No	No	No	N/A	Review	B	Yes	Yes
Roosevelt	Hyde Park	NARA facility	2005	Yes	Yes	Yes	Yes	Yes	Yes	B	Yes	Yes
Truman	Independence	NARA facility	2010	B	No	Review	No	Yes	Yes	Yes	Yes	Yes
Eisenhower	Abilene	NARA Library	2011	B	Review	Review	Yes	Yes	Review	B	Yes	Yes
		NARA Museum	2011	B	Review	Review	No	Yes	Review	B	Yes	Yes
		NARA Boyhood Home	2011	Historic Structure	Review	Historic Structure	Historic Structure	N/A	No	B	Yes	Yes
Kennedy	Boston	NARA facility	2005	Yes	Yes Mitigation	Yes	Yes	Yes	Yes	B	Yes	Yes
		FAE facility	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Johnson	Austin	NARA facility	2009	Yes	No	No	No	N/A	No	B	Yes	Yes
Nixon	Yorba Linda	NARA facility	2007	Yes	Yes Mitigation	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Ford Library	Ann Arbor	NARA facility	2012	B	Review	Review	Yes	Yes	UV film	B	Yes	Yes
Ford Museum	Grand Rapids	NARA facility	2012	B	Yes	Yes	Yes	Yes	Yes	B	Yes	Yes

³ Provided by Preservation Programs Division

Facility	Location	Ownership / Date	BCR Date	Structural Standards 1571.6: B	Water Damage 1571.7: B and RX	HVAC Design 1571.8 and 1571.11: B and RX	Environmental Conditions 1571.9 (T&RH) & .11 (pollutants): RX	Finishes and Materials 1571.12 - .15: RX	Lighting 1571.16: RX	Fire Safety and Security 1571.18 - 21: B	Facility Operation & Surveys 1571.22-.23: B, RX, LP	Other 1571.24: LP
Carter	Atlanta	NARA facility	2008	B	Review	Review	Review	Yes	Yes	B	Yes	Yes
Reagan	Simi Valley	NARA facility	2007	B	Review	No	No	N/A	Yes	B	Yes	Yes
George W.H. Bush	College Station	NARA facility	2008	Yes	Review	No	T and RH No; pollutants Yes	N/A	Yes	B	Yes	Yes
Clinton	Little Rock	NARA facility	2009	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
George W. Bush	Dallas, TX	NARA facility	n/a	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Appendix C – Regional Facilities NARA 1571 Compliance (as of March 2013)⁴

Compliant
 Non-Compliant
 Project or Review in progress/Near Compliant

Facility	Location	Ownership	BCR Date	Structural Standards 1571.6: B	Water Damage 1571.7: B & RX	HVAC Design 1571.8 and 1571.11: B & RX	Environmental Conditions 1571.9 (T&RH): RX	Environ. Conditions 1571.11 (pollutants): RX	Finishes & Materials 1571.12 - .15: RX	Lighting 1571.16: RX	Fire Safety & Security 1571.18 – 21: B	Facility Oper. & Surveys: 1571.22-23: B & RX	Other 1571.24: R, RX
RE-BO	Waltham MA	GSA	n/a	B	Review in progress	Review in progress	Yes	Review planned	n/a	Yes	B	N/A	Yes
RE-NY	Custom House, NY, NY	GSA	n/a	B	Project in progress	Project in progress	No data-new building	No data- new building	Yes	Yes	B	N/A	Yes
RE-PA	Market St, Philadelphia, PA	GSA	n/a	B	Project in progress	Project in progress	No data-new building	No data- new building	Yes	Project in progress	B	N/A	Review in progress
RE-PA	Townsend Rd, Philadelphia, PA	Commercial lease (GSA)	n/a	B	Project in progress	Project in progress	No data-new building	No data- new building	Yes	Project in progress	B	N/A	
RE-AT	Atlanta/ Morrow GA	NARA	tba	B	Review in progress	Review in progress	Review	Review in progress	Yes	Yes	B	Yes	Yes

⁴ Provided by Preservation Programs Division

Facility	Location	Ownership	BCR Date	Structural Standards 1571.6: B	Water Damage 1571.7: B & RX	HVAC Design 1571.8 and 1571.11: B & RX	Environmental Conditions 1571.9 (T&RH): RX	Environ. Conditions 1571.11 (pollutants): RX	Finishes & Materials 1571.12 - .15: RX	Lighting 1571.16: RX	Fire Safety & Security 1571.18 – 21: B	Facility Oper. & Surveys: 1571.22-23: B & RX	Other 1571.24: R, RX
RM-CH	Chicago IL	GSA	n/a	B	Projects in progress	Projects in progress	No	Review planned	n/a	Project in progress	B	N/A	Yes
RM-KC	Union Station Kansas City KS	Commercial lease (GSA)	n/a	B	Review in progress	Review in progress	Yes	Review in progress	Yes	Yes	B	N/A	Yes
AFO--LS	Lenexa KS	Commercial lease (GSA)	n/a	B	Review in progress	Review in progress	Yes	Review planned	n/a	Yes	B	N/A	Review in progress
AFO-LX	Lee's Summit, MO	Commercial lease (GSA)	n/a	B	Review in progress	Review in progress	No	No	n/a	Yes	B	N/A	Review planned
RM-DV	Broomfield, Denver CO	Commercial lease (GSA)	n/a	B	Review in progress	Review in progress	No data-new building	No data- new building	Yes	Review in progress	B	N/A	Review in progress
RM-FW	John Burgess, Ft Worth TX	Commercial lease (NARA)	n/a	B	Review in progress	Review in progress	Yes	Yes	Yes	Yes	B	N/A	Yes
RW-AN	Anchorage AK	GSA	n/a	B	Review in progress	Review in progress	No	Review planned	n/a	Yes	B	N/A	Yes
RW-SE	Seattle WA	GSA	n/a	B	Review in progress	Review in progress	Yes	Review planned	n/a	Yes	B	N/A	Yes
RW-SB	San Bruno CA	GSA	n/a	B	Review in progress	Projects in progress	No	Review planned	n/a	Review	B	N/A	Review planned
RW-RS	Perris CA	Commercial lease (NARA)	n/a	Yes	Yes	Yes	Yes	Review planned	Yes	Yes	Yes	N/A	Yes