

**OFFICE OF INSPECTOR GENERAL  
NATIONAL ARCHIVES AND RECORDS ADMINISTRATION**

**Audit of NARA's Specially Protected Holdings**

**OIG Audit Report No. 15-03**

**February 6, 2015**

## Table of Contents

---

Executive Summary.....	3
Background.....	5
Objectives, Scope, Methodology.....	8
Audit Results.....	10
Appendix A – Acronyms and Abbreviations .....	30
Appendix B - Management’s Response to the Report .....	31
Appendix C - Report Distribution List.....	32

## Executive Summary

---

Specially Protected Holdings (SPHs) are holdings determined by managers of custodial units<sup>1</sup> to need special protection and extra measures of physical and intellectual control because they are (1) especially valuable or vulnerable to theft; (2) likely targets of vandalism; or (3) known or presumed to contain concentrations of sensitive PII; particularly in electronic format.<sup>2</sup> The National Archives and Records Administration (NARA) Office of Inspector General (OIG) initiated an audit to determine whether offices were protecting, controlling, handling, and accounting for SPHs<sup>3</sup> in accordance with NARA guidance and whether recommendations in prior audit reports<sup>4</sup> were adequately implemented.

It has been five years since the last two audits related to SPRs<sup>5</sup> were completed. However, many of the internal control weaknesses identified in prior reports still exist as the recommendations have not been adequately implemented. The existing SPHs internal controls are not adequate to ensure effective oversight and management of SPHs. Some internal controls have been outlined in NARA 1572, *Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*, and its Supplement, *Staff Procedures and Special Protection Requirements for Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*. However, additional implementation effort is needed by Security Management, Presidential Libraries, Field Office Archives, and Textual Processing Branches to ensure records are controlled, handled, accounted for, and protected. We noted:

- SPHs were not always properly monitored as security guidelines were inadequate in some cases;
- SPHs inventory listings were not always fully documented, at the item level, or accurate;
- SPHs inspections were not always properly completed and recorded;

---

<sup>1</sup> NARA offices responsible for SPHs.

<sup>2</sup> Examples of SPHs include documents or other items with original handwriting and signatures from prominent people (Presidents, heads of state, celebrities, etc.) or other documents deemed to be of sufficiently high intrinsic or monetary value to warrant additional protection.

<sup>3</sup> Excluding artifacts and holdings known or presumed to hold electronic personally identifiable information (PII).

<sup>4</sup> OIG Audit Report No. 09-01, *Audit of the Controls Over Presidential Library Textual Records* (January 14, 2009) and OIG Audit Memorandum No. 09-04, *Regional Archives Compliance with Procedures for Controlling Specially Protected Holdings* (January 15, 2009).

<sup>5</sup> This report will use the term SPHs to be consistent with NARA 1572. Prior audit reports used the term Specially Protected Records (SPRs), which will be used when referencing those reports.

- Access to SPHs storage areas was not always properly controlled; and
- SPHs procedures were outdated, not documented, or not comprehensive.

Without adequate internal controls, NARA does not have assurance SPHs are properly protected from loss, theft, or vandalism.

Our audit identified opportunities for improvement to assist NARA in the protection and accounting of SPHs. We made ten recommendations to strengthen NARA's internal controls and management of SPHs.

## Background

---

Title 44 of the United States Code, Chapter 21, Section 2107 indicates the Archivist of the United States may accept for deposit with the National Archives of the United States the records of a Federal agency, the Congress, the Architect of the Capitol, or the Supreme Court determined by the Archivist of the United States to have sufficient historical or other value to warrant their continued preservation by the United States Government. Section 2111 also indicates when the Archivist considers it to be in the public interest he may accept for deposit the papers and other historical materials of a President or former President of the United States, or other official or former official of the Government, and other papers relating to and contemporary with a President or former President of the United States, subject to restrictions agreeable to the Archivist as to their use. Chapter 22, Section 2202, states the United States shall reserve and retain complete ownership, possession, and control of Presidential records.

NARA 1572, *Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*, was issued in December 2010. The directive specifies NARA's policy on preventing theft and vandalism of NARA holdings in NARA facilities, especially archival materials needing special protection, and the procedures for implementing the policy. The directive covers Federal records, Presidential and Vice Presidential records, Nixon Presidential historical materials, and donated historical materials, including artifacts, in the National Archives of the United States regardless of their location, or in NARA's physical possession under terms of an agreement. NARA 1572 Supplement 1, *Staff Procedures and Special Protection Requirements for Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*, documents staff procedures and special protection requirements for preventing theft and vandalism of NARA holdings in NARA facilities.

Business Support Services - Security Management (BX) develops and administers policies, and implements a holdings protection program to reduce the loss of and aid in the recovery of holdings while ensuring ready access for research by all stakeholders. BX also administers the holding protection program, which includes managing a multi-disciplinary team of holdings protection, archival and training experts; utilizing associated technological applications; incorporating focused training, and conducting announced and unannounced verification and compliance inspections to mitigate internal and external threats by improving oversight, surveillance and access controls to holdings agency-wide.

The Director for the Office of Presidential Libraries (1) plans, directs, and coordinates programs for the acquisition, storage, preservation, processing, review, description, access to and disposal of Presidential records, Federal records, and donated historical materials (including artifacts) in the Presidential Libraries and (2) develops policies and procedures for the management and operation of Presidential Libraries. Presidential Library Directors establish physical and management control over the records, including the storage, arrangement, and security of records and other historical materials and the space housing them.

Research Services Access Coordinators work together to develop access policies, procedures, and tools to ensure operational consistency and cohesive planning across the system. The Access Coordinators ensure Field Office Archives successfully establish and maintain intellectual and physical control of records (except legislative and Presidential records and materials), including the storage, arrangement, and security of accessioned and donated records and the space housing them.

#### Prior Reports

OIG Audit Report 09-01, *Audit of the Controls over Presidential Library Textual Records*, focused on controls over Presidential library textual records. The audit found controls could be improved over Specially Protected Records (SPRs), revealing:

- Presidential Libraries were not in compliance with several requirements contained in NARA 1572, Security for NARA Holdings;
- BX had not inspected/certified SPRs storage areas;
- Current guidance was not adequate for ensuring accountability of SPRs at Presidential Libraries via sampling; and
- All SPRs had not been identified by the libraries.

The audit report made four recommendations.

OIG Audit Memorandum 09-04, *Regional Archives Compliance with Procedures for Controlling Specially Protected Holdings*, was conducted after it was discovered while performing fieldwork for OIG Audit Report 09-01 the Field Office Archives were not in compliance with several aspects of NARA 1572 related to SPHs. The audit found there was regional archive non-compliance with procedures to provide additional protection to a sub-set of archival holdings known as SPHs. NARA had not performed the following activities relating to controls over SPHs:

- Nominated selected staff for background checks required to access vaults or other specially protected areas;
- Reported their storage methods, exact container locations, and names of staff with access to SPHs to BX; and
- Performed annual inventories of SPHs and provided the results to the Office Head.

The audit report made four recommendations.

## Objectives, Scope, Methodology

---

The purpose of this audit was to determine whether (1) offices were protecting, controlling, handling, and accounting for SPHs in accordance with NARA guidance and (2) recommendations in *Audit of the Control over Presidential Library Textual Records* (OIG Audit Report 09-01) and *Regional Archives Compliance with Procedures for Controlling Specially Protected Holdings* (Audit Memorandum 09-04) were adequately implemented. The audit was conducted at Archives I, Archives II, and select Field Office Archives and Presidential Libraries.

To accomplish our objectives we interviewed representatives from Business Support Services - BX, Presidential Libraries, and Research Services. We reviewed NARA 1572, *Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*; NARA 1572, Supplement 1, *Staff Procedures and Special Protection Requirements for Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*, NARA 1561, *Records Emergency Preparedness and Recovery in NARA Facilities*; Interim Guidance NARA 1561-1, *Roles and Responsibilities for Records Emergency Preparedness and Recovery in NARA Facilities*; NARA 276, *Employment or Service Suitability Determinations*; and NARA 273, *Administrative Procedures for Security Clearances*. We reviewed the results from prior reports (OIG Audit Report 09-01 and Audit Memorandum 09-04) and determined whether recommendations were adequately implemented.

To observe physical security controls over SPHs we visited five Presidential Libraries – Jimmy Carter, Gerald R. Ford, Herbert Hoover, John F. Kennedy, and Ronald Reagan; four Field Office Archives – Atlanta, Boston, Riverside and St. Louis; and the Textual Processing Branches in Washington, DC and College Park, Maryland. We received a tour of the facilities and their storage spaces for SPHs. We also reviewed controls to determine whether (1) records were maintained at the box, folder, or item level; (2) all SPHs had been identified; (3) access to SPHs was adequately controlled; (4) SPHs had been inspected each year; and (5) procedures were in place in case SPHs or areas where the records were held were harmed by water, fire, chemical or biological contamination. We reviewed if BX conducted inspections of SPHs storage spaces, risk assessments, and initial certifications of SPHs storage areas.

We obtained SPHs inventory listings from Field Office Archives, Presidential Libraries, and Textual Processing Branches visited. To determine the accuracy of the inventory listings, we judgmentally selected a total of 1,228 SPHs items for review from the listings and SPHs storage areas. Because the samples were judgmentally selected for each location, we cannot project the results across the population.



This performance audit was conducted in accordance with generally accepted government auditing standards between June 2013 and November 2014<sup>6</sup>. 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.

---

<sup>6</sup> Fieldwork for the audit was completed in June 2014. The Exit Conference was not held until November 2014. The issuance of this audit was delayed due to other competing priorities within the OIG.

## Audit Results

---

### 1. Security Guidelines for Specially Protected Holdings.

Security guidelines were inadequate for SPHs. Specifically, BX had not inspected SPHs storage areas or maintained lists of SPHs storage areas and staff with access to these areas. We also noted the majority of employees with access to SPHs were in positions designated as low risk. NARA 1572, *Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*, specifies NARA's policy on preventing theft and vandalism of NARA holdings in NARA facilities, especially archival materials needing special protection, and the procedures for implementing the policy. This condition can be attributed to both weakened internal controls for SPHs as identified in NARA 1572, *Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*, NARA 1572, Supplement 1, *Staff Procedures and Special Protection Requirements for Preventing Theft and Vandalism of NARA Holdings in NARA Facilities*, and BX's lack of oversight of SPHs. As a result, SPHs may not be properly safeguarded and at risk for theft and vandalism.

#### Security Guidelines - Storage Areas Inspections and Initial Certifications

During the audit, we reviewed actions taken to close recommendations related to security guidelines for SPHs identified in two of our previous audits, *Audit of the Controls Over Presidential Library Textual Records* (OIG Audit Report No. 09-01) and *Regional Archives Compliance with Procedures for Controlling Specially Protected Holdings* (Audit Memorandum No. 09-04). We noted in our prior audit reports (1) BX had not performed inspections of any SPRs holding areas since the establishment of the requirement in 2006 and (2) initial certifications of SPRs storage areas did not occur to ensure SPRs storage areas complied with BX's guidelines. We recommended the Assistant Archivist for Administrative Services (NA)<sup>7</sup> (1) ensure BX conduct reviews and initial certifications of SPRs storage areas, (2) clearly articulate and document the criteria for evaluating SPRs storage areas, including the method by which the evaluations would occur (if other than inspection), and (3) make a provision to ensure results were clearly documented and transmitted, including any recommended remedial action.

---

<sup>7</sup> This position no longer exists. BX reports to the Executive for Business Support Services.

During this audit, we noted BX had not implemented the recommendation to perform inspections of SPHs holding areas or complete initial certifications of SPHs storage areas. NARA 1572 was updated in December 2010, after the previous audits, and updated BX's responsibilities, stating BX:

- Develops and administers policies, and implements a comprehensive holdings protection program to reduce the loss of holdings.
- Conducts inspections of secure areas of NARA-occupied facilities, or reviews contractor-prepared inspection reports, as part of the cycle of security and workplace inspections, and otherwise works with NARA custodial units to assure that facilities are suitable for securing NARA holdings until on-site, physical inspections can be conducted.
- Advises NARA custodial units on appropriate measures to secure holdings in their area of responsibility, including advice for preparation of local directives implementing physical and personnel security. Recommends concurrence of final directives.
- Conducts risk assessments.

We met with BX's Director and the Holdings Protection Team (HPT) about inspections and initial certifications of SPHs storage areas. During our initial meeting with the HPT we were told:

- Some facility site visits were conducted by the HPT;
- It was not the HPT's responsibility to determine if SPHs storage areas were adequate;
- The HPT did not perform SPHs inspections; and
- It was not the HPT's responsibility to ensure custodial units adhered to NARA 1572.

Yet, during a subsequent meeting with BX's Director we were told inspections were performed as a part of the Facility Security Risk Assessment and Inspections<sup>8</sup> performed by BX. The Director indicated the HPT's primary focus has been to work on closing out the holdings protection material weakness identified in FY 2001, which includes training staff on holdings protection. Starting in FY 2015 the HPT will be evolving to a

---

<sup>8</sup> The inspection includes an in-depth look at physical security, fire safety, OSHA regulatory compliance and conformance with accessibility standards.

traditional oversight process and is currently working on the report format and checklists to support a compliance process.

We reviewed a March 2014 Facility Security Risk Assessment and Inspection Report and noted it did not show evidence of SPHs inspections. Instead of a SPHs inspection, a checklist was used to ask questions related to NARA 1572 at each facility visited. When the checklist was completed, there were no details provided regarding the SPHs storage areas, their location, or physical conditions. The four questions asked were:

- Have all personnel taken the required Holdings Protection Training?
- Are holdings that are stored or processed maintained safe from theft and vandalism?
- Are supervisors aware of the reporting requirement of theft and vandalism?
- Is the local management aware of the requirements for transporting items?

We requested documentation related to site visits performed by the HPT. The HPT did not have any written reports from the visits, but provided the OIG with a two page document listing Presidential Libraries and Field Office Archives visited from May 2012 through April 2014. In the two page document there was a note indicating no SPHs findings were identified at regional facilities and a comment of “Working Now” for the libraries. The HPT followed up with an additional one page document of SPHs observations at the Regions and Libraries. Based on our review, the observations were limited and appeared to be documented in an effort to satisfy the OIG request made during the audit rather than document the security of SPHs at each location.

During the 2009 audit of SPHs, BX management stated they did not know when they would have the resources necessary to conduct SPHs inspections. The Holdings Protection Program and the HPT were created in 2009, after the audits were conducted. The Program was established to enable NARA to strengthen the infrastructure necessary to protect NARA holdings, increase accountability, and implement administrative corrective action. It has been five years and there are now nine HPT full time employees. However, the HPT’s primary focus has been conducting agency-wide holdings protection training. Resources have not been adequately utilized as other responsibilities have been neglected, including conducting inspections to ensure holdings protection policies and procedures are followed. The HPT’s has been slow in implementing a comprehensive Holdings Protection Program, and more than training is needed to protect the agency’s holdings, including SPHs.

NARA cannot be certain SPHs are maintained in a secure and compliant environment unless detailed inspections are conducted.

Security Guidelines – Storage methods, container locations, names of staff with access to storage areas, and background investigations

In the previous audits we also recommended the Presidential Libraries and Regional Archives<sup>9</sup>:

- Report the names of staff with access to SPRs to BX; and
- Report storage methods and exact container locations to BX.

We also recommended NARA 1572 be revised to include specific information concerning the timing and level of background checks required of staff with access to SPHs, or ensure BX develop standard operating procedures for SPHs background checks to augment current guidance.

One of the actions taken by NARA to address the recommendations was updating NARA 1572. We compared the original version of NARA 1572, *Security for NARA Holdings*, dated January 14, 2006 and the updated version dated December 7, 2010 (See Table 1). There were changes to SPHs security guidelines in the updated version of NARA 1572 including removal of the guidelines the OIG noted NARA was not adhering to in our previous audits. Moreover, although BX is responsible for implementing a comprehensive holdings protection program to reduce the loss of and aid in the recovery of holdings; we noted their responsibilities defined under NARA 1572 have been diminished.

---

<sup>9</sup> Regional Archives are now called Field Office Archives.

Table 1: NARA 1572 version comparisons

In NARA 1572 (as of January 14, 2006) custodial units were required to:	In NARA 1572 and Supplement 1 (as of December 7, 2010) custodial units were required to:
Report their storage methods and exact containers locations to BX to compile and maintain a central list of all specially protected storage areas and containers.	Maintain up-to-date lists of storage methods and exact container locations of all specially protected storage areas and secured areas (e.g., safes, locked file cabinets, and other containers).
Office heads, regional facility directors, and library directors upon recommendation of responsible managers, designate staff members to receive the combination or key to the stack, vault, or safe containing holdings under special protection. The names of these persons and the specific areas (vault or safe location) to which they have access are forwarded to BX.	Office heads, regional facility directors, and library directors upon the recommendation of responsible managers, designate staff members to receive the combination or key to the stack, vault, or safe containing holdings under special protection. Lists of individuals with such access are maintained by the custodial units with copies sent to the office head.
Nominate selected staff for background checks required to access vaults or other specially protected areas.	Designate selected NARA staff with security clearance or who have passed a National Agency Check with Inquiries (NACI), with credit check conducted every 5 years, to access secure storage areas.

*Storage methods, container locations, and names of staff with access to storage areas*

Field Office Archives, Presidential Libraries, and Textual Processing Branches use various methods to store SPHs, including cages, vaults, and safes. The facilities also designate certain staff with access to the secure storage areas. Yet when NARA 1572 was updated, custodial units were no longer required to report their storage methods or the names of staff members with access to SPHs. Under NARA 1572, BX is not responsible for collecting, reviewing, and monitoring the storage methods, exact containers, and staff members with access to SPHs. This information is now maintained within the custodial units only.

We also noted only the custodial units and not BX were assigned the responsibility of monitoring and testing holdings protection. The custodial units are to maintain (1) up-to-date lists of storage methods and exact container locations of all specially protected storage and secured areas (2) lists of individuals with access to the combination or key to the stack, vault or safe containing holdings under special protection, and (3) monitor and test holdings protection as part of annual internal control plans.

When we asked why the changes were made to NARA 1572, BX's Director indicated he did not know how those responsibilities made it into the original version of NARA 1572. When the directive was updated, he indicated the responsibility of maintaining this information was assigned to the custodial units, not BX. Without additional monitoring controls in place, management cannot be assured SPHs are properly secured.

#### *Background investigations*

Based on our review, NARA 1572 provides no guidance on the level of background checks required for staff to access SPHs storage areas. During an interview, the Director of Security Management indicated it is up to the individual custodial units to decide who needs background investigations, which is dependent on the level of security of the SPHs holdings.

When we visited selected Field Office Archives, Presidential Libraries, and Textual Processing Branches, we requested the names of staff with access to the SPHs storage areas. We also obtained the staff's type of position (low risk, secret, top secret, or public trust) from NARA's Personnel Security Officer. We noted the majority of staff with access to SPHs were in positions classified as low risk (non-sensitive) which did not require background investigations. Of the 53 staff members with access to the SPHs storage areas, 28 positions were designated as non-sensitive, 20 as top secret, three as public trust, and two as secret (See Table 2). For example, two staff with low risk positions at the Washington, DC Textual Processing Branch had access to Presidential Proclamations, World War II Surrender Documents, and Records Relating to Lincoln Assassination Suspects. These records and many others require specialized protection, but some of the position types do not correspond to their significance.

According to NARA 1572, staff with a security clearance or who have passed a NACI must have a credit check conducted every five years. Based on our discussion with NARA's Personnel Security Officer, credit checks were not conducted every five years for those staff with a NACI or security clearances lower than Top Secret. The Personnel Security Officer was unaware of the requirement and indicated the policy, NARA 1572, was not correct.

Table 2: Types of Positions at Field Office Archives, Presidential Libraries, and Textual Processing Branches

Types of Positions/Risk Designations	Investigative Requirements	Reinvestigation	Number of staff members at Field Office Archives	Number of staff members at Presidential Libraries	Number of staff members at Textual Processing Branches
Low risk (Non-Sensitive)	National Agency Check with Inquiries (NACI)	Every 15 years	22	4	2
Public Trust (Noncritical Moderate Risk)	Minimum Background Investigation (MBI)	Every 15 years	2	1	0
Secret (Noncritical Sensitive)	Access with National Agency Check with (Written) Inquiries (ANACI) or National Agency Check with Local Agency Check and Credit (NACLIC)	Every 10 years	1	1	0
Top Secret (Critical Sensitive)	Single Scope Background Investigation (SSBI)	Every five years	4	10	6

As defined earlier in the report, SPHs are holdings that would benefit from protection because they are (1) especially valuable or vulnerable to theft; (2) likely targets of vandalism; or (3) known or presumed to contain concentrations of sensitive PII; particularly in electronic format. Designating a position as low risk (non-sensitive) does not provide the agency a high level of assurance that individuals with access to SPHs have been thoroughly vetted through the investigative process. Additionally, many of the positions designated as low risk were located in Field Office Archives where exit screenings were not available to deter and detect removal of records including SPHs.



We also noted when we talked with staff at some of the Field Office Archives, they indicated when reviewing records they sometimes come across classified documents. Without at least one individual at the Field Office Archives with a security clearance, there is the potential for individuals to have improper access to classified information.

**Recommendation 1**

The Chief Operating Officer should ensure NARA 1572 is updated to require custodial units to report (1) their storage methods and exact containers locations to BX to compile and maintain a central list of all SPHs storage areas and containers and (2) names of staff members and the specific areas (vault or safe location) to which they have access to BX (those that receive the combination or key to the stack, vault, or safe containing holdings under protection).

**Management Response**

Management concurred with the recommendation.

**Recommendation 2**

The Executive for Business Support Services should ensure:

- a) Security Management performs initial certifications of SPHs storage areas.
- b) Security Management performs security inspections of SPHs storage areas.
- c) Security Management develops guidelines for SPHs security inspections, including timeframes, criteria, documenting requirements, and reporting requirements. The reporting requirements should include details on the inspections, including observations, findings, and recommendations identified from the inspections.

**Management Response**

Management concurred with the recommendation.

**Recommendation 3**

The Chief Operating Officer should ensure an analysis is performed to determine if staff with access to SPHs, positions should be designated higher than low risk (non-sensitive) positions. Based on the analysis, nominate selected staff for required background investigations.

**Management Response**

Management concurred with the recommendation.

**2. Specially Protected Holdings Inventories.**

Controls over SPHs inventories have not been fully implemented by all of the Presidential Libraries, Field Office Archives, and Textual Processing Branches. Specifically, SPHs inventory listings were not always (1) fully documented, (2) at the item level, (3) accurate, and (4) printed and maintained by custodial units. Also, listings were maintained in multiple applications and maybe accessible to others. This condition can be attributed to the lack of management oversight and custodial units failure to comply with policies documented in NARA 1572 Supplement 1. NARA 1572 Supplement 1 requires custodial units to create and maintain an item list of documents needing special protection. As a result of not maintaining a complete list of SPHs, theft or damage may go undetected.

**Inventory listings were not fully documented or at the item level**

Our previous audit report, *Audit of the Controls Over Presidential Library Textual Records (OIG Audit Report No. 09-01)*, noted some of the Presidential Libraries visited did not consistently maintain an itemized list of “unique record items.” We recommended the Assistant Archivist of Presidential Libraries<sup>10</sup> ensure all libraries, in accordance with NARA 1572, maintain inventories of SPHs. During this audit we noted this recommendation had not been implemented.

We requested inventory listings of all SPHs stored at the Field Office Archives, Presidential Libraries, and Textual Processing Branches. We received inventory listings for the 13 Presidential Libraries. Some of the Presidential Libraries have completely documented their SPHs inventories at the item level while others were still not completed. Specifically, we noted:

---

<sup>10</sup> This position no longer exists. It is now called the Executive for Legislative Archives, Presidential Libraries, and Museum Services.

Table 3: Presidential Libraries SPHs Inventories

Presidential Library	Status of SPHs Inventory
George Bush	100% inventory not completed and only 3% of the inventory listing was at the item level.
George W. Bush	Completely inventoried their SPHs at the item level.
Jimmy Carter	Only inventories the donor deed files. Management indicated they do not inventory the preservation or handwriting files because creating an inventory list of the files would require a great amount of resources which they believe would have very little benefit. The Library also has classified SPHs in the Sensitive Compartmented Information Facility (SCIF) which have not been inventoried. They include Jimmy Carter and the First Lady's diaries, as well as any other documents withdrawn due to national security concerns.
William J. Clinton	Completely inventoried their SPHs at the item level.
Dwight D. Eisenhower	Completely inventoried their SPHs at the item level.
Gerald R. Ford	Completely inventoried their SPHs at the item level.
Herbert Hoover	Completely inventoried their SPHs at the item level.
Lyndon Baines Johnson	Documented item-level lists for some of their collections. Other collections had not been processed and do not have an item-level lists
John F. Kennedy	Preliminary identified their SPHs. Ninety percent of the SPHs have been identified at the box level with the remaining ten percent at the item level. According to management, it will take several years to document the SPHs at the item level.
Richard Nixon	Separated materials for preservation they consider to be SPHs. The inventory listing was only at the box level.
Ronald Reagan	Documented all SPHs at the item level except for audio visual records and diaries.
Franklin D. Roosevelt	Inventoried all of their SPHs; however all items were not at the item level.
Harry S. Truman	Completely inventoried their SPHs at the item level.

The Office of Presidential Libraries recognizes the need to document inventories and in 2012 setup working groups of Supervisory Archivists to draft a comprehensive policy on identifying, storing, and tracking SPHs. Actions required by the Presidential Libraries as a result of the policy will include completing item level inventories of all SPHs.

*Field Office Archives*

We also received SPHs inventory listings for all of the Field Office Archives, except for San Bruno. Of the Field Office Archives visited:

- Boston - all records have not been identified. Records were still being indexed and SPHs identified during that process.
- St. Louis - boxes of Clinical Very Important Person (VIP) Records from Bethesda Medical Center and Walter Reed have not been inventoried at St. Louis. These are temporary records scheduled to be kept for 50 years.

*Textual Processing Branches*

The Washington, DC Textual Processing Branch inventory listing in Holdings Management System (HMS) is at the folder level and not item level.

The lack of an itemized list complicates efforts to control and account for SPHs.

Inventory listings were not always accurate

During our visits to the Field Office Archives, Presidential Libraries, and Textual Processing Branches we performed testing to determine the accuracy of the inventory listings. We selected items from the inventory listings and from SPHs storage areas. Based on our testing, we noted the majority of the listings were accurate. However, there were some anomalies, including items not found and items not listed or documented with incorrect locations. Specifically, we noted the following:

- Herbert Hoover Library – Originally 19 of 154 (12%) items selected for testing could not be found during our testing. The files were eventually located by the staff after our departure.
- John F. Kennedy Library – The Library uses Access to manage the inventory at the box level. The Library is in the process of transitioning to Documentum, which captures inventory information at the item level. We tested both the Access and Documentum inventory listings. We located all of the items selected for testing for the Access inventory listing. However, seven of 104 (7 %) items selected for testing for the Documentum listing were either not listed or there were more items on the shelf than listed in Documentum.
- Boston Field Office Archives – Four of 71 (6%) items selected for testing were not included on the itemized SPHs listing.

- St. Louis Field Office Archives – Thirteen of 225 (6%) items selected for testing could not be located or were located in different locations. The items were from the VIP, Employee/Relatives, and Contingent Reappraisal Pending (CRP) VIP files.

Inventory losses could go undetected without accurate inventory listings.

Multiple applications were used to maintain inventory files

We noted there is not a centralized application, such as the HMS, used to maintain SPHs inventories. We also noted the electronic files were also not always password protected. The Field Office Archives, Textual Processing Branches, and Presidential Libraries each use different applications to manage their inventories. Applications used include Word, Access, Documentum, and HMS. The use of multiple applications does not allow the agency to centrally track SPHs.

Parallel files were not maintained

We noted some of the Field Office Archives, Presidential Libraries, and Textual Processing Branches visited did not maintain duplicate copies of their SPHs inventories:

- Field Office Archives – Riverside and St. Louis
- Presidential Libraries – Jimmy Carter, Ronald Reagan, John F. Kennedy, Gerald R. Ford, and George Bush
- Textual Processing Branches - College Park and Washington, DC

NARA 1572 Supplement 1 indicates custodial units are to create and maintain a parallel file or an item list of documents needing special protection and keep the list in a locked security container. Additionally, at a minimum custodial units are to keep a duplicate copy of the list under lock elsewhere in the responsible unit and if electronic copies of such lists are maintained on a shared network drive, they must be password-protected and accessible only to staff responsible for SPHs areas.

We also noted BX did not maintain copies or have access to electronic versions of SPHs inventory listings. The listings were only maintained by the custodial units. As the office administering the Holdings Protection Program, it is essential for BX to know the agency's holdings requiring special protection as a part of their oversight role.

Electronic copies should not be the only versions of inventory listings. Locked printed copies allow custodial units to identify their inventory in case of hardware failures.

**Recommendation 4**

The Executive for Business Support Services should ensure Security Management maintains copies or obtains access to SPHs inventory listings and use them to randomly select records and verify their condition and location during inspections.

**Management Response**

Management concurred with the recommendation.

**Recommendation 5**

The Executive for Research Services and Executive for Legislative Archives, Presidential Libraries, and Museum Services should ensure:

- a) SPHs inventory listings are completed at the item level. Establish a timeframe for when the listings must be completed. Additionally, communicate with other offices to identify best practices used in documenting their inventories.
- b) Inventory listings are reviewed to determine their accuracy and update as necessary.
- c) A finding aid is created for the agency's entire SPHs collection at the item level.
- d) Locked hard copies of the inventory listings are maintained.
- e) SPHs inventory listings are maintained in HMS. Until HMS is implemented by all offices, all electronic versions of the listings are password protected and access limited to authorized employees.

**Management Response**

Management concurred with the recommendation.

**3. Specially Protected Holdings Inspections.**

SPHs inspections performed by Presidential Libraries and Field Office Archives were not always properly completed and recorded. According to NARA 1572 Supplement 1, Presidential Libraries, Field Office Archives, Textual Processing Branches responsible managers are required to annually inspect materials at least once a year. This occurred because management, including, the Office of Presidential Libraries, Research Services, and BX did not implement monitoring controls to ensure custodial units were following inspection policies established in NARA 1572. Without verification and compliance

procedures by management, there is no assurance the inspections were properly completed.

Based on interviews and our review of 2011, 2012, and 2013 inspection reports:

- Some custodial units have not conducted 100% initial inspections of SPHs inventories;
- Some custodial units have not completed the required annual inspections;
- Three percent of SPHs were not always annually inspected;
- Inspections items were not randomly selected;
- Inspections teams did not always include at least one staff member who did not work directly for the individual responsible for the area being inspected;
- Timeframes were not established for some inspections; and
- Some inspection reports were not detailed.

#### Initial Inspections

Our review revealed four of the five libraries visited had not completely inspected all of their SPHs. Jimmy Carter, Herbert Hoover, John F. Kennedy, and Ronald Reagan Presidential Libraries have inspected ten percent or fewer of their SPHs inventories. The Washington, DC Textual Processing Branch had only inspected approximately 10% of its inventory. Inspections are conducted to verify a document is located in the specially protected stack, vault, or safe, and note its physical condition. Without performing an initial inspection to physically inspect each item and capture the condition of the item, it will be challenging to conduct future inspections as there is no initial information from which the items can be properly managed.

#### Annual Inspections

Presidential Libraries, Field Office Archives, Textual Processing Branches are required to conduct annual inspections of SPHs. However, we noted in 2011 fifteen custodial units had not completed annual inspections. We noted improvement by the Field Office Archives in 2012 and 2013 with all of them completing their annual inspections. Many of the libraries did not complete the inspections in 2012 and 2013 as some of them were still in the process of documenting their inventories. See Table 4.

Table 4: Annual Inspections

<b>Custodial Unit</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
Field Office Archives			
Atlanta	X	X	X
Boston	X	X	X
Chicago	Not Completed	X	X
Denver	Not Completed	X	X
Fort Worth	Not Completed	X	X
Kansas City	X	X	X
New York City	Not Completed	X	X
Philadelphia	X	X	X
Riverside	Not Completed	X	X
St. Louis	Not Completed	X	X
San Bruno	Not Completed	X	X
Seattle	Not Completed	X	X
Presidential Libraries			
George Bush	Not Completed	Not Completed	Not Completed
George W. Bush	X	X	X
Jimmy Carter	Not Completed	Not Completed	X
William J. Clinton	X	Not Completed	Not Completed
Dwight D. Eisenhower	X	X	X
Gerald R. Ford	X	X	X
Herbert Hoover	Not Completed	X	X
Lyndon Baines Johnson	Not Completed	Not Completed	Not Completed
John F. Kennedy	Not Completed	Not Completed	Not Completed
Richard Nixon <sup>11</sup>	Not Completed	Not Completed	Not Completed
Ronald Reagan	Not Completed	X	X
Franklin D. Roosevelt	X	X	X
Harry S. Truman	X	X	Not Completed
Textual Processing Branches			
College Park	X	X	X
Washington, DC	X	X	X

At least three percent of SPHs at each facility are to be inspected annually. The SPHs are to be randomly selected, distributed proportionately, and different from year to year. We found three percent were not always selected for inspection and those selected were not always randomly selected. For example, instead of randomly selecting items for inspection, in 2013 the Ronald Reagan Library inspected one box of the Ronald Reagan

<sup>11</sup> Prior to issuance of the draft report, the Office of Presidential Libraries provided documentation to support inspections were completed by the library in 2012 and 2013. This information was not made available during fieldwork.



Pre Presidential Papers: Speeches and Writings and four boxes of the Presidential Handwriting File: Telephone Calls. In 2012, the Library also did not randomly select items and only inspected one and half percent of their inventory.

Inspection teams also did not always include two individuals from two different functional areas. Inspection teams are to consist of at least two persons and must include at least one representative of the unit or archives staff and, if possible, a staff member who does not work directly for the individual responsible for the area being inspected. Although NARA 1572 Supplement 1 allows the option of using someone from a different area, using two individuals from different functional areas could help prevent collusion between staff members.

Annual inspections were created to review the condition of the records and verify they are stored at the correct location. Loss or damage to SPHs may go undetected when inspections are not conducted.

### Inspection Reports

We noted:

- There is no guidance of what should be included in inspection reports;
- Instead of documenting results in inspection reports, some libraries documented their results in the annual Management Assurance Statements;
- Some inspection reports submitted did not include details of what was inspected including location and condition; and
- BX was not involved in the review of inspection results.

NARA 1572 Supplement 1 states inspection teams are required to prepare a written report and submit it to the supervisory archivist and library director or archives director and regional administrator, who forwards to the office head. When the inspections are conducted the team is verifying an item is located in the specially protected stack, vault, or safe, and notes its physical condition.

For example, the 2013 Hoover Report stated “On July 25, 2013 Museum Registrar and A-V Archivist/ISPM verified 3% of Specially Protected Records at the Herbert Hoover Presidential Library-Museum (LP-HH). The SPHs materials are maintained in locked cages on the second floor of the Library's stacks. Keys to access the cages are held by the LP-HH Security Office.” In another example, the Eisenhower Library indicated in its Management Assurance Statement the inventory was completed in FY 2011 and FY 2012. The 2011 and 2012 Management Assurance Statements only indicated an

inventory was completed by a Supervisory Archivist and another staff member. There were no other details included in either library's report. Failure to provide details of items inspected and condition of those items does not allow the office head to conduct a true evaluation of the inspection for compliance and anomalies.

Textual Processing Branches are required to complete their inspections between October 1 and April 30, and submit the report to the office head by May 30. However, no timeframes have been established in NARA 1572 for when Presidential Libraries and Field Office Archives should complete their inspections. This policy is inconsistent. It does not allow Presidential Libraries and Field Office Archives office heads to perform a concurrent and comprehensive review based on an established date.

NARA 1572 does not require BX to receive or review the results of annual inspections. However, the inspections can be a good source of information to aid BX in its oversight of the holdings. The HPT cannot effectively issue guidance or conduct comprehensive training if they are not involved in the monitoring of annual inspections.

**Recommendation 6**

The Chief Operating Officer should ensure NARA 1572 is updated to include (1) responsibilities for Security Management to review annual inspections, including documenting the review, for compliance with NARA 1572, (2) timeframes for when Presidential Libraries and Field Office Archives should complete annual inspections, and (3) the amended requirement for annual inspection reports to include the date of the inspection, individuals that complete the inspections, and a listing of items inspected, including their location and physical condition.

**Management Response**

Management concurred with the recommendation.

**Recommendation 7**

The Executive for Legislative Archives, Presidential Libraries, and Museum Services should ensure all Presidential Libraries are in compliance with NARA 1572 policy of conducting annual inspections.

**Management Response**

Management concurred with the recommendation.

**Recommendation 8**

The Executive for Research Services and Executive for Legislative Archives, Presidential Libraries, and Museum Services should ensure:

- a) Initial inspections of SPHs inventory are completed.
- b) Custodial units are in compliance with NARA 1572, including randomly inspecting at least 3% of SPHs inventory annually on a rotating basis and using one individual that does not work for the individual responsible for the inspection.
- c) Annual inspection reports include at a minimum date of inspection, individuals that complete the inspections, and a listing of items inspected, including their location and physical condition.
- d) Annual inspection results are adequately documented and communicated to Security Management and office heads.

**Management Response**

Management concurred with the recommendation.

**4. Access to Specially Protected Holding Storage Areas.**

Presidential Libraries and Field Office Archives did not always monitor use and control staff access to SPHs storage areas. This occurred because management at some custodial units did not fully implement policies established in NARA 1572 or its Supplement. Failure to monitor use of records and access to the SPHs storage areas places the records at risk and could lead to theft.

NARA 1572 requires custodial units to monitor use and control staff access to SPHs storage areas. Specifically, (1) only staff and managers designated to have access to stacks, vaults, or safes containing holdings under special protection are authorized to have access to these areas or containers, (2) staff entering the secure area sign in and out on NA Form 14094, or SF 701, Activity Security Checklist or other NARA-approved form, and (3) materials taken out of the SPHs storage areas for any reason requires documentation by using NA Form 14001, or other appropriate NARA-approved form.

During the audit we reviewed how custodial units monitor use and control staff access to SPHs storage areas. While majority of the custodial units visited during the audit monitored traffic with a sign in and out document, Charge Out Card, HMS pull slips, or a Reference Service Slip (NA Form 14001), the Atlanta Field Office Archives did not always document when SPHs were accessed.

Further, at the Jimmy Carter Library (1) the key list for who has access to the SPHs storage area has not always been kept updated, (2) there is no cross reference between the key list and the SPHs sign-in sheet, and (3) if any archival staff requested the key to the SPHs storage area, they would be given a key; which would allow those individuals to have access to the SPHs storage area alone.

When access to SPHs and storage areas is not properly monitored, management cannot ensure records of such high importance are properly safeguarded.

### **Recommendation 9**

The Executive for Research Services and Executive for Legislative Archives, Presidential Libraries, and Museum Services should ensure:

- a) Staff is properly trained or retrained to use charge out cards whenever records are removed from SPHs storage areas.
- b) Access to SPHs storage areas is properly monitored, including keeping the list for who has access to the SPHs areas updated at all times and restricting access to only authorized staff.

### **Management Response**

Management concurred with the recommendation.

## **5. Policies and Procedures for Specially Protected Holdings.**

Standard Operating Procedures (SOP) for the handling of SPHs either did not exist, were not comprehensive, or were outdated. NARA 1572 requires the development and implementation of SOP for each records storage area where materials requiring special protection are kept. Procedures were not documented because custodial units never enforced the requirement for each records storage area to develop SOP and management relied on staff knowledge or the policies outlined in NARA 1572 and its Supplement. Lack of current documented procedures result in inconsistent process operations, key person dependencies, and overall process inefficiency.

GAO's Standards for Internal Control in the Federal Government, states management is responsible for developing the detailed policies, procedures, and practices to fit their agency's operations and to ensure that they are built into and an integral part of operations. Information should be recorded and communicated to management and

others within the entity, who need it, and in a form and within a time frame, which enables them to carry out their internal control and other responsibilities.

Our review found two of the five libraries visited (Herbert Hoover and John F. Kennedy) and four Field Office Archives (Riverside, San Bruno, Seattle, and St. Louis) did not have formally written or comprehensive procedures for each records storage areas. Seattle did not develop their own SOP, but indicated they “use the information found in NARA 1572, Supplement 1(B) as their Standard Operating Procedures for Specially Protected Materials.” We also found the Washington, DC Textual Processing Branch procedures had not been updated since 2006.

We noted in 2009 and 2010 instructions and templates were given to Field Office Archives to update or establish SOP for Holdings Security, including SPHs. As noted, some of these locations were still without procedures for SPHs during the audit. It is important to have formalized procedures specific to each location as they are a part of staff training necessary to ensure protection of holdings. They also provide specific instructions to staff on the steps they must take to perform work or to respond to certain situations.

### **Recommendation 10**

The Executive for Research Services and Executive for Legislative Archives, Presidential Libraries, and Museum Services should ensure:

- a) Required elements for the handling of SPHs for each record storage area should be communicated to each custodial unit.
- b) Detailed procedures are documented for each custodial unit.
- c) A process is in place for periodic review of procedures and updates are made as needed.

### **Management Response**

Management concurred with the recommendation.

## Appendix A – Acronyms and Abbreviations

---

ANACI	Access with National Agency Check with (Written) Inquiries
BX	Security Management
CRP	Contingent Reappraisal Pending
HMS	Holdings Management System
HPT	Holdings Protection Team
LP-HH	Herbert Hoover Presidential Library-Museum
NACI	National Agency Check with Inquiries
NACLC	National Agency Check with Local Agency Check and Credit
NARA	National Archives and Records Administration
OIG	Office of Inspector General
SCIF	Sensitive Compartmented Information Facility
SOP	Standard Operating Procedures
SPHs	Specially Protected Holdings
SPRs	Specially Protected Records
SSBI	Single Scope Background Investigations
VIP	Very Important Person

## Appendix B - Management's Response to the Report

---



NATIONAL  
ARCHIVES

Date: JAN 29 2015  
To: James Springs, Acting Inspector General  
From: David S. Ferriero, Archivist of the United States  
Subject: OIG Revised Draft Audit Report 15-03, Audit of NARA's Specially Protected Holdings

Thank you for the opportunity to provide comments on this revised draft report. We appreciate your willingness to meet and clarify language in the report. We concur with all of the 10 recommendations in this audit, and we will address them further in our action plan.

We remain concerned that the report fails to acknowledge that NARA policy allows managers of custodial units to substitute a container, box or folder list in place of an item list if an entire series or collection needs special protection. However, we intend to move to item level control over time as part of our digitization efforts and as such believe we can support the pertinent recommendations.

If you have any questions, please contact Kimm Richards at [kimm.richards@nara.gov](mailto:kimm.richards@nara.gov) or by phone at 301-837-1668.

DAVID S. FERRIERO  
Archivist of the United States

NATIONAL ARCHIVES *and*  
RECORDS ADMINISTRATION  
8601 ADELPHI ROAD  
COLLEGE PARK, MD 20740-6001  
[www.archives.gov](http://www.archives.gov)

## **Appendix C - Report Distribution List**

---

Archivist of the United States

Deputy Archivist of the United States

Chief Operating Officer

Deputy Chief Operating Officer

Executive for Business Support Services

Executive for Legislative Archives, Presidential Libraries, and Museum Services

Executive for Research Services

Management Control Liaison, Performance and Accountability