



May 15, 2020

TO: David S. Ferriero
Archivist of the United States

FROM: James Springs *James Springs*
Inspector General

SUBJECT: *NARA's Use of the 2017 Women's March Image*
OIG Report No. 20-R-11

The National Archives and Records Administration (NARA) Office of Inspector General (OIG) received a congressional request to launch an independent investigation into NARA's decision to alter a photographic Getty image NARA featured in the agency's public exhibition, *Rightfully Hers: American Women and the Vote (Rightfully Hers)*. Specifically, the request sought to (1) determine whether this was an isolated event or part of a broader pattern by NARA under the current administration and (2) produce recommendations and respective corrective actions to support deterring like situations from occurring in the future. In response to the congressional request, the OIG initiated two engagements: (1) an investigation to determine whether NARA's decision to alter the image was politically motivated; and (2) a review to assess the adequacy of internal controls over the exhibit development process. This report is the result of the review.

NARA altered the images for the *Rightfully Hers* exhibit. This occurred because NARA did not have sufficient internal controls for the exhibit development process. Specifically, NARA did not have current policies and procedures for the exhibit development process and there was no evidence of supervisory approval for changes made to the *Rightfully Hers* exhibit. Absent current documented policies or procedures that incorporate supervisory reviews and approvals, management is limited in its ability to ensure staff consistently apply standards for exhibit development. The lack of internal and management controls prevents the ability to detect and address deviations from established practices and management direction. Furthermore, absent these control activities, the integrity of NARA's exhibits may be questioned resulting in increased exposure to reputational risks. We found no evidence of political influence to alter the image. This appears to be an isolated event and not part of a broader pattern by NARA. The OIG is making one recommendation to ensure NARA has controls in place to prevent similar incidents from occurring in the future.

During the course of the review, NARA management initiated efforts to address exhibit development, including an internal review of outdated exhibit policies and procedures. In addition, interim guidance is being developed to provide an avenue for management and staff to escalate any potentially sensitive topics which require senior leadership approval.

Background

NARA launched its *Rightfully Hers* exhibit at the National Archives Museum in Washington D.C. on May 10, 2019. The exhibit “highlights the relentless struggle of diverse activists throughout U.S. history to secure voting rights for all American women.”¹ It features more than 90 items—including the original 19th Amendment and other records, artifacts, and photographs. In the hallway outside of the exhibit the agency featured a NARA designed lenticular² display with a commercially-licensed photograph of the 2017 Women’s March, and an archival photograph of the 1913 suffrage march on Washington – both of which were taken from the same location and angle on Pennsylvania Avenue in Washington, D.C. The two photographs were chosen with the objective of linking the exhibit with contemporary issues.

On January 17, 2020, more than eight months after the *Rightfully Hers* exhibit’s opening, the Washington Post released an article, *National Archives exhibit blurs images critical of President Trump*, which highlighted NARA’s alterations of the image from the 2017 Women’s March used in the lenticular. Specifically, the article references the blurring of signs held by marchers that were critical of President Trump as well as words on signs that referenced women’s anatomy.

While the Archivist took full responsibility for the changes to the image in his public apology,³ the alternation of the 2017 Women’s March image raised several concerns from the archival community and members of the general public, including motivations behind the alterations as well as the procedures leading to the decision to alter the images.

¹ Rightfully Hers: American Women and the Vote, <https://museum.archives.gov/rightfully-hers>

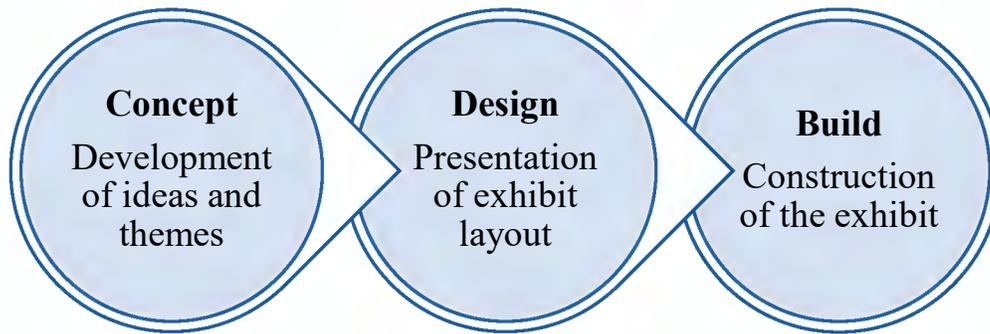
² Lenticular printing is a technology in which lenticular lenses are used to produce printed images with an illusion of depth, or the ability to change or move as the image is viewed from different angles.

³ National Archives Apologizes for Alteration of Women's March Image, Press Release, January 18, 2020

Exhibit Development

NARA's exhibit development process encompasses three major phases: concept, design, and build. Refer to a description of each phase in Figure 1: Phases of Exhibit Development below:

Figure 1 - Phases of Exhibit Development



The Office of Legislative Archives, Presidential Libraries, and Museum Services – Museum Program Division (LO) ⁴ is responsible for developing and managing exhibits for NARA. LO staff appeared knowledgeable of the stages in exhibit development including the respective activities that should occur at each interval. However, staff proceeded with the creation of exhibits, including *Rightfully Hers*, without current policies and procedures to follow.

The existing policies and procedures, which LO did not follow, were significantly outdated. The existing guidance related to exhibit standards, *Admin 201, Chapter 13. Public Outreach. Part 5. Public Programs*, has an effective date of June 30, 1986; more than 30 years ago. NARA was also aware of the outdated policies, as communicated in related guidance published in December 2010. Specifically, *NARA 1573, Preservation, Security and Transportation Standards for Exhibition of Original NARA Holdings*, states, while NARA exhibit policies and procedures have changed substantially over time, NARA's comprehensive written exhibit standards have not been substantively revised since 1985.⁵ Even though the Agency recognized exhibit standards were significantly outdated, the directive had yet to be amended to reflect present operations and organizational structures.

⁴ Formerly Museum Exhibits Division (LX). NARA 101, NARA Organization and Delegation of Authority, effective February 16, 2020

⁵ NARA 1573, Preservation, Security and Transportation Standards for Exhibition of Original NARA Holdings, effective December 14, 2010

NARA III.5c, NARA Directives, states “Strategy and Performance (MP) reviews policy directives at least every two years from the date signed and coordinates necessary updates with the responsible office.” In accordance with GAO Standards for Internal Control in the Federal Government, management should implement control activities through policies and procedures. Outdated policies or procedures may not address changes in relevant systems and technologies, organizational structures, or the strategic direction of the Agency; which could impact management’s ability to ensure effective and efficient development of exhibits. Additionally, absent current documented policies or procedures, management cannot ensure that staff consistently apply standards for exhibit development.

Exhibit Clearance

Prior to the *Rightfully Hers* exhibit’s launch, in August 2017, the LO staff presented the conceptual design of the exhibit to the Archivist of the United States, including the plan to design the lenticular display. The Archivist regarded the merging of the photograph of the 2017 Women’s March with the photograph of the 1913 suffrage march on Washington as representing the arc of ongoing women’s struggles for equality, the importance of the 19th Amendment, and a clever use of the lenticular design. The Archivist was pleased with the lenticular display, however he had concerns with using the image as it is not an archival holding, as NARA traditionally uses only archival records in its exhibits. Additionally, he was also concerned NARA was a non-partisan agency; therefore the lenticular display could lend NARA to being implicated in a partisan debate as the 2017 Women’s March was viewed as protest to Trump’s election.⁶

During the OIG’s interviews with LO management and staff, and later acknowledged by the Archivist in his blog post, we found there were apprehensions related to displaying inappropriate language in a family-friendly Federal museum. However, we found no evidence the Archivist explicitly directed staff to make alterations to the image. Guided by discussions of avoiding both accusations of partisanship and complaints of displaying inappropriate language in the exhibit, LO staff interpreted the Archivist’s concerns as direction and independently decided to make the following alterations to four protest signs in the 2017 Women’s March image:

- The word “Trump” in a sign reading “God Hates Trump” was blurred;
- The word “Trump” in a sign reading “Trump & GOP - Hands Off Women” was blurred; and
- Two signs with messages referencing women’s anatomy were blurred.

LO submitted the altered version of the image to Getty Images⁷ for approval, which was subsequently granted. When the *Rightfully Hers* exhibit opened, the lenticular display (including

⁶ Washington Post article, *National Archives exhibit blurs images critical of President Trump*

⁷ The 2017 Women’s March Image was not a NARA record, but a commercially-licensed photograph that NARA paid Getty Images to use as a promotional graphic.

the altered image and the 1913 suffrage march on Washington) was used as a graphic component outside of the gallery space to draw the audience into exhibit.

Supervisory control activities over actions taken during exhibit development are inadequate. Specifically, we determined although LO staff are fully engaged in the day-to-day operational activities related to exhibit development, follow-up actions applied at integral phases of exhibit development do not require documented supervisory reviews or sign-offs. For the *Rightfully Hers* exhibit, we found no documented evidence that the final lenticular image, inclusive of alterations made in the 2017 Women's March image, was approved by the Archivist (or representative, on his behalf) to ensure the actions implemented by LO addressed the Archivist's concerns.

GAO Standards for Internal Control in the Federal Government states, management should design control activities to achieve objectives and respond to risks. Moreover, the standards state transaction control activities are actions built directly into operational processes to support the entity in achieving its objectives and addressing related risk.

The lack of supervisory control activities, such as documented supervisory reviews and approvals, for actions directed by management and implemented by staff during exhibit development not only create an environment that lacks accountability, but also encumber management's ability to detect and address deviations from expectations.

NARA's Plans for Moving Forward

After the publication of The Washington Post article, NARA conducted an internal review of exhibit policies and processes. The policies related to exhibit approval and display included the following:

- Admin 201, Chapter 13, Public Outreach, effective June 30, 1986
- NARA 1573, Preservation, Security and Transportation Standards for Exhibition of Original NARA Holdings, effective December 10, 2010
- NARA, 101, Part 9, Legislative Archives, Presidential Libraries and Museum Services, effective October 2, 2016

During the review of internal policies and processes related to exhibits, it became apparent NARA lacked a formalized mechanism to assess potentially delicate issues and operational risks related to NARA's exhibits and public programs. Federal leaders and management are responsible for implementing management practices that effectively identify, assess, respond, and report on risks.⁸ As such the agency commenced developing guidance that would provide

⁸ OMB Circular No. A-123, Management's Responsibility for Enterprise Risk Management and Internal Control, July 15, 2016

instructions on approaching sensitive topics in exhibits and programs during development.⁹ The draft interim guidance, *Handling Sensitive Issues and Operational Risks Related to NARA Exhibits and Public Programs*, would create a formalized protocol that would empower staff to escalate foreseeable sensitive issues or topics during the development of an exhibit or public program. Senior management would then vet these concerns.

Recommendations

We recommend the Chief Operating Officer revise, develop, and implement policies and procedures to standardize the exhibit development process, and ensure:

- a) The guidance incorporates protocols for addressing sensitive topics and operational risks including adequate control activities; such as, but not limited to, documented supervisory reviews/approvals;
- b) The policies and procedures are communicated to staff; and
- c) There is a documented plan to periodically review and revise the policy directive(s) or any associated interim guidance in accordance with NARA 111, NARA Directives.

As with all OIG products, we will determine what information is publicly posted on our website from the attached report. 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 report. 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.

Please call me with any questions, or your staff may contact Jewel Butler, Assistant Inspector General for Audits, at (301) 837-3000.

cc: Debra Wall, Deputy Archivist of the United States
William Bosanko, Chief Operating Officer
Chris Naylor, Deputy Chief Operating Officer
Kimm Richards, Accountability
United States House Committee on Oversight and Government Reform
Senate Homeland Security and Governmental Affairs Committee

⁹ At the time of our review, the interim guidance was in draft and will be reviewed by senior management.



Date: May 28, 2020

To: James Springs, Inspector General

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

Subject: OIG Report 20-R-11, *NARA's Use of the 2017 Women's March Image*

Thank you for your recent review of *NARA's Use of the 2017 Women's March Image*. The actions outlined below will address the issues identified by your review.

We are currently drafting a new directive that establishes policy and requirements for exhibits and public programs at NARA. Specifically, this directive will (a) establish accountability for the exhibit and public program decision making process, including approvals; (b) ensure exhibits and public programs are consistent with NARA's purpose, mission, and values, (c) provide guidance on identifying and dealing with sensitive issues or operational risks in exhibits and public programs; and (d) identify documentation requirements.

As noted above, the new directive will incorporate protocols for addressing sensitive topics and operational risks, including adequate control activities, such as documented supervisory reviews/approvals. The directive will be issued and communicated to all staff via a NARA Notice.

NARA will periodically review public programs and exhibit directives, policy, and standard operating procedures, and revise, if necessary, in consultation with stakeholders. This will be included in the new directive on exhibits and public programs.

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We expect the actions outlined above to result in clear policies and procedures to strengthen the internal controls over the exhibit development process. If you have questions about this response, please contact Kimm Richards at kimm.richards@nara.gov or by phone at 301-837-1668.

Sincerely,

A handwritten signature in dark ink, appearing to read "David S. Ferriero". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

DAVID S. FERRIERO
Archivist of the United States