

September 24, 2025

TO:

Jay Trainer

Chief Operating Officer

FROM:

William Brown

Acting Inspector General

SUBJECT: Audit of NARA's Research Room Activities OIG Audit Report No. 25-AUD-05

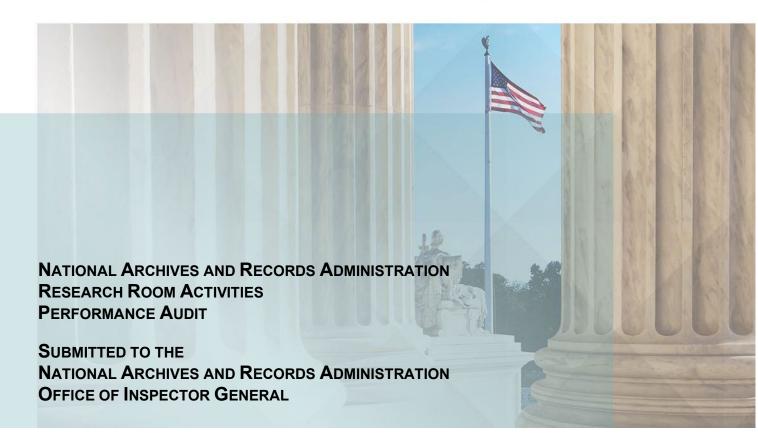
William

The Office of Inspector General (OIG) contracted with Sikich CPA LLC (Sikich) to conduct an independent performance audit of NARA's Research Room Activities. The objective of this audit was to evaluate the controls in place at selected research rooms. The report contains five recommendations to strengthen NARA's research room policies and procedures.

Sikich is responsible for the attached auditor's report dated September 23, 2025 and the conclusions expressed in the report. The findings and conclusions presented in the report are the responsibility of Sikich. The OIG's responsibility is to provide adequate oversight of the contractor's work in accordance with Generally Accepted Government Audit Standards.

Please provide planned corrective actions and expected dates to complete the actions for each of the recommendations within 30 days of the date of this report. As with all OIG products, we determine what information is publicly posted on our website from the published report. Consistent with our responsibility under the Inspector General Act of 1978, as amended, we may provide copies of our report to congressional committees with oversight responsibility for NARA. We appreciate the cooperation and assistance NARA extended to us during this audit. Please contact me with any questions.





PERFORMANCE AUDIT REPORT
SEPTEMBER 23, 2025



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SIKICH.COM

September 23, 2025

William Brown
Acting Inspector General
Office of Inspector General
National Archives and Records Administration

Subject: Performance Audit of NARA's Research Room Activities

Dear Mr. Brown:

Sikich CPA LLC (Sikich) is pleased to submit the attached report detailing the results of our performance audit of the National Archives and Records Administration's (NARA's) Research Room Activities, conducted under contract number 88310323A-00012, order number 88310324F00250. The objective of this audit was to evaluate controls in place at selected research rooms.

We conducted the audit fieldwork in Alexandria, Virginia; Atlanta, Georgia; Kansas City, Missouri; Riverside, California; Simi Valley, California; Yorba Linda, California; St. Louis, Missouri; College Park, Maryland; Washington, D.C.; and remotely from September 2024 through August 2025. We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards*, as issued by the Comptroller General of the United States (2018 Revision, Technical Update April 2021). Those standards require that 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We describe our objective, scope, and methodology further in **Appendix A: Objective, Scope, and Methodology**.

We would like to thank all the NARA personnel with whom we met, or who provided information, for their cooperation and assistance.

Sincerely,

Sikich CPA LLC



Executive Summary

The National Archives and Records Administration (NARA) Office of the Inspector General (OIG) engaged Sikich CPA LLC (Sikich) to conduct a performance audit to evaluate the controls in place at selected research rooms.

PERFORMANCE AUDIT OF NARA'S RESEARCH ROOM ACTIVITIES

Why Did We Conduct This Audit?

NARA has stated its commitment to providing access to the records in its custody through the broad range of services it provides for its customers: educators, federal agencies, genealogists, researchers, students, veterans, and visitors. To carry out this commitment, NARA operates public research rooms at 27 locations nationwide.

This audit's objective was to evaluate the controls in place at selected research rooms.

To address this objective, we reviewed relevant policies and procedures and selected a sample of NARA research rooms, operated by Research Services and the Office of Presidential Libraries. We visited the selected NARA research rooms to observe key processes. In addition, we interviewed NARA personnel responsible for operating the selected research rooms on a day-to-day basis to further understand how each selected research room operated.

What Did We Find?

Overall, we found that NARA generally had effective policies and procedures in place for managing its research rooms. However, NARA has opportunities to improve its pull slip process. Pull slips are the forms that NARA personnel must prepare whenever they remove records from their proper place in the stacks for use in research rooms or in other authorized locations.

We selected a sample of pull slips for each research room in the scope of our performance audit. During our testing, we identified 381 instances in which NARA personnel did not properly complete the pull slips. For example, we identified instances in which responsible personnel had not documented (1) researcher card numbers; (2) the record of chargeouts, which denotes when NARA personnel provide a record to a researcher and when the researcher returns the record to NARA's custody; or (3) the "refiled by" section. We found these instances occurred at both NARA Research Services facilities and Presidential Libraries.

Without properly completing pull slips, NARA cannot ensure that it is properly tracking and protecting records. Furthermore, if NARA were to determine that a record was damaged or that part of a record was missing, NARA would not be able to perform a complete investigation to determine who had access to the record at the time.

What Did We Recommend?

This report makes five recommendations that are intended to strengthen NARA's research room policies and procedures.



Summary of Recommendations

Number	Recommendation	Responsible Office
1	Issue guidance reinforcing the importance of consistently following established NARA Research Services pull slip policies and procedures.	Executive for Research Services
2	Update the Standard Operating Procedure for Field Units: Pulling and Refiling Records to reflect current practices.	Executive for Research Services
3	Review and update the guidance <i>NA Form 14001: Procedures At Presidential Libraries</i> as needed to improve clarity.	Executive for Presidential Libraries
4	Provide training for NARA Presidential Library personnel on an annual basis to demonstrate how to properly complete pull slips and highlight the importance of the established requirements in tracking and protection of records.	Executive for Presidential Libraries
5	Update the standard operating procedures for the National Archives at St. Louis for pulling and refiling records, including which fields are required to be completed.	Executive for Research Services

I. Background

NARA is an independent agency within the executive branch of the federal government that is responsible for preserving, protecting, and providing access to the records of the United States government. NARA operates 27 research room locations nationwide, across Research Services facilities, Federal Record Centers, and Presidential Libraries. These rooms provide public access to significant historical documents and records for researchers, educators, and general visitors. Research Services oversees the research room activities and is responsible for ensuring the delivery of efficient and effective services at non-Presidential Library research rooms. The Office of Presidential Libraries oversees the research rooms at Presidential Libraries. NARA has established several policies related to research room activities. Staff policies provide guidance for how staff are to serve researchers, handle records, and deal with incidents. In addition, NARA has defined policies for researchers to follow when they are using the research room. Both Research Services and the Office of Presidential Libraries have implemented standard operating procedures (SOPs) to operationalize NARA policies.

Before accessing a research room, researchers are required to complete an online orientation course and obtain a research card. The card is valid for one year and must be renewed annually. Upon arrival, researchers check in, present their identification, and receive their cards. NARA staff are also required to complete the online orientation course to be considered researchers.

Once admitted to the research room, researchers use a pull slip (NA Form 14001) to request records. NARA staff can assist the researcher with completing the pull slip. After the researcher has completed the pull slip, NARA personnel review and approve the pull slip. NARA personnel then take the completed pull slip and retrieve the requested materials for the researcher to review. All NARA facilities require staff to use the standardized pull slip, which is a four-part, color-coded, carbon copy document. The four color-coded parts of the pull slip are white, pink, green, and yellow. This system is intended to ensure that NARA personnel return the records to their original locations, as well as to assist in an investigation in the event that a record is damaged or goes missing. The white and pink copies of the pull slip both have a 25-year retention requirement, while NARA personnel discard the green and yellow copies after the researcher returns the record. Some facilities meet this requirement by storing the paper copies of the pull slips in the stacks, while others make digital copies and store them on NARA servers.



A NARA staff member and the researcher use the white copy to document (1) the records information needed to enable NARA personnel to pull the records for the researcher, (2) the name of the NARA staff member who reviewed and approved the pull slip, (3) the name of the NARA staff member who pulled (or retrieved) the records, (4) the date and time the NARA staff member provided the records to the researcher, (5) researcher's acknowledgment that they received the records, and (6) the date the NARA staff member refiled the records. The white copy also serves as the master carbon copy that transfers the information to the other colored forms. NARA personnel use the pink copy to document the custody of records, including the time at which NARA personnel provided the records to the researcher and the time at which the researcher returned the records to NARA's custody. The green copy remains with the cart the NARA staff member used to move the records from the stacks to the research room, and the staff member discards this copy upon re-shelving the records. Finally, the NARA staff member retrieving the records places the yellow copy on the shelf where NARA maintains the records and discards this copy after re-shelving the records. Other research room controls include staff monitoring of researcher record-handling and security measures such as cameras.

Pull Slip Requirements

NARA has identified requirements associated with the pull slip process in several different documents, depending on the facility in which the research room is located. There are two versions of the primary pull slip requirements in NA Form 14001. NA Form 14001: *Reference Service Slip* defines the requirements for pull slips completed at Archives I, while the guidance *NA Form 14001: Procedures at Presidential Libraries* defines the requirements for pull slips completed at Presidential Library facilities. Meanwhile, *Standard Operating Procedure for Field Units: Pulling and Refiling Records (SOP)*, July 2023, defines the requirements for pull slips completed at NARA field units. Both versions of NA Form 14001 include 16 fields for the researcher and NARA staff to complete; however, the Presidential Libraries consider 4 of the fields to be optional. Examples of required fields include Number of Boxes Requested and Pulled, Received By, Refiled By, and Research Card Number.

The National Archives at St. Louis, Missouri, uses an additional form, NA Form 13173, which is a unique form for requesting military and civilian service files that researchers can only access at this facility. NA Form 13173 requires most of the same fields as NA Form 14001 but also includes two additional fields: the Case Management Reporting System (CMRS) Request Number and Screening Notes.

In addition, NARA's *Research Room Rules* require that researchers obtain a researcher registration card before they are granted access to NARA records. To obtain a researcher identification card, one of the steps requires the researcher to complete a researcher orientation.

To test the effectiveness of NARA's research room activities, Sikich reviewed NARA's researcher application, pull slip, and records management processes. We held discussions with Research Services and Presidential Libraries before visiting a sample of nine sites with research rooms. After walking through the research room processes, we selected a sample of pull slips and associated researcher documentation for each facility. We tested each pull slip

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¹ The National Archives at St. Louis is co-located with the National Personnel Records Center (NPRC) in St. Louis. The NPRC is the central repository of personnel-related federal records (non-archival) for the military and civil services of the U.S. Government. The National Archives at St. Louis holds archival U.S. Government personnel-related records, which are available to the public.



against the relevant criteria above to determine the extent to which NARA effectively carried out research room activities.

II. AUDIT RESULTS

Overall, we found that NARA generally had effective policies and procedures in place to manage its research rooms. However, NARA has opportunities to improve its pull slip process at research rooms managed by Research Services and Presidential Libraries.

Finding 1: NARA's Research Room NA Form 14001 Pull Slip Process Needs to Be Standardized and Enforced

We selected a non-statistical sample of 25 pull slips from the following facilities: the National Archives in Washington, D.C. (Archives 1); National Archives at Atlanta, Georgia (Atlanta); National Archives at Kansas City, Missouri (Kansas City); National Archives at Riverside, California (Riverside); and National Personnel Records Center at St. Louis, Missouri (St. Louis). We requested supporting evidence to ensure that researchers and NARA personnel properly completed the pull slip and that NARA personnel properly approved the pull slip before serving records to the researcher. Table 1 details the issues we identified when reviewing the sampled pull slips from the Research Services sites, as follows:

Table 1: Pull Slip Process Exceptions at Selected NARA Research Rooms

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	Exception	Archives 1	Atlanta	Kansas City	Riverside	St. Louis	Total
1.	Researcher name not properly/completely documented	1	2	0	0	1	<u>4</u>
2.	Researcher card number not documented	3	2	0	0	1	<u>6</u>
3.	Researcher orientation not evidenced	2	0	0	0	1	<u>3</u>
4.	Researcher application not evidenced	2	0	0	0	1	<u>3</u>
5.	Date not documented on pull slip	0	1	0	0	11	<u>12</u>
6.	Time stamp (pull/check-in/check- out) missing	0	1	0	1	6	<u>8</u>
7.	Box/item number not documented	1	1	0	0	1	<u>3</u>
8.	Number of boxes/items pulled not documented	0	3	0	0	4	<u>7</u>
9.	Record group number/collection designation not documented	0	1	0	0	23	<u>24</u>
10.	Series/collection name not documented	0	1	0	0	7	<u>8</u>
11.	Location information not documented	0	0	0	0	24	<u>24</u>



Exception	Archives 1	Atlanta	Kansas City	Riverside	St. Louis	Total
12. "Request pulled by" field not completed	4	0	0	0	1	<u>5</u>
13. "Request received by" field not completed	1	3	0	0	17	<u>21</u>
14. Staff pulls not properly identified	0	4	0	0	0	<u>4</u>
15. "Refiled by" field not properly completed	1	1	0	1	23	<u>26</u>
Record of charge-outs not documented or incomplete	1	17	4	0	25	<u>47</u>
Grand Total	<u>16</u>	<u>37</u>	<u>4</u>	<u>2</u>	<u>146</u>	<u>205</u>

Source: Sikich analysis

These exceptions occurred because NARA personnel inconsistently applied the defined pull slip processes and procedures. In some cases, we also found that the standard practices at sites identified above did not match the defined procedures. Without proper completion of pull slips, NARA cannot ensure that it is properly tracking and protecting records. Furthermore, if NARA were to determine that a record was damaged or that part of a record was missing, NARA would not be able to perform a complete investigation to determine who had access to the record at the time.

Therefore, we recommend the Executive for Research Services:

Recommendation 1: Issue guidance reinforcing the importance of consistently following established NARA Research Services pull slip policies and procedures.

Recommendation 2: Update the *Standard Operating Procedure for Field Units: Pulling and Refiling Records* to reflect current practices.

Finding 2: NARA Presidential Libraries Do Not Consistently Follow Required Pull Slip Procedures

We selected a non-statistical sample of 25 pull slips from each of the 4 selected Presidential Libraries and requested supporting evidence to ensure the pull slip was properly completed and the researcher was properly approved before being served records. Table 2 details the issues we identified when reviewing the sampled pull slips from the selected Presidential Libraries, as follows:

Table 2: Pull Slip Process Exceptions at Selected NARA Presidential Libraries

	Exception	Reagan	Nixon	Carter	Truman	Total
1.	Employee pulls not properly noted in the "Other" section	0	0	4	0	<u>4</u>
2.	Evidence the researcher completed researcher orientation before the date of the pull slip not provided	0	0	0	8	<u>8</u>
3.	Location/stack information not included on the pull slip	0	23	0	1	<u>24</u>



	Exceptions	Reagan	Nixon	Carter	Truman	Total
4.	Number of boxes pulled not documented	0	3	3	0	<u>6</u>
5.	Number of boxes requested not documented	0	0	2	0	<u>2</u>
6.	Pull slip date not properly completed	3	1	1	0	<u>5</u>
7.	"Received by" field not properly completed	4	0	11	1	<u>16</u>
8.	"Record of Charge Outs" on back of pink slip not properly completed	9	0	6	25	<u>40</u>
9.	"Refiled by" field not properly completed	2	24	1	22	<u>49</u>
10.	Researcher card number not documented	0	0	7	0	<u>7</u>
11.	Researcher first name not documented	0	0	1	0	1
	Totals	<u>18</u>	<u>51</u>	<u>36</u>	<u>57</u>	<u>162</u>

Source: Sikich analysis

Although NARA Presidential Libraries has defined policies and procedures, staff members were either unaware of the requirements or lacked clarity regarding how to use the pull slips and which section(s) of the pull slips the researcher and NARA staff members must complete.

Without properly completing pull slips, NARA cannot ensure that it is properly tracking and protecting records. Furthermore, if NARA were to determine that a record was damaged or that part of a record was missing, NARA would not be able to perform a complete investigation to determine who had access to the record at the time.

Therefore, we recommend the Executive for Presidential Libraries:

Recommendation 3: Review and update the guidance *NA Form 14001: Procedures at Presidential Libraries* as needed to improve clarity.

Recommendation 4: Provide training for NARA Presidential Library personnel on an annual basis to demonstrate how to properly complete pull slips and highlight the importance of the established requirements in tracking and protection of records.

Finding 3: NARA's National Archives at St. Louis NA Form 13173 Pull Slip Process Needs to be Standardized and Enforced

We selected a non-statistical sample of 25 NA Form 13173 pull slips from the National Archives at St. Louis. As noted above, the NA Form 13173 is specific to the National Archives at St. Louis because it is a unique form for requesting military and civilian service files that researchers can only access at this facility. We requested supporting evidence to ensure the pull slip was properly completed and the researcher was properly approved before being served records. The issues we identified when reviewing the sampled pull slips are detailed in Table 3:



Table 3: Pull Slip Process Exceptions Associated with NA Form 13173

Exception	NA Form 13173 Pull Slip
Researcher card number not documented	4
Time stamp (pull/check-in/check-out) missing	3
CMRS search request number not documented	4
Screening notes section not signed	2
Requested pull slip and supporting documentation could not be provided	1
Total	<u>14</u>

Source: Sikich analysis

These exceptions occurred because staff members did not consistently apply established pull slip procedures. In addition, the procedures associated with NA Form 13173 do not include specific guidance for pulling and re-filing records, including identifying which fields researchers and NARA personnel are required to complete.

Without properly completing pull slips, NARA cannot ensure that it is properly tracking and protecting records. Furthermore, if NARA were to determine that a record was damaged or that part of a record was missing, NARA would not be able to perform a complete investigation to determine who had access to the record at the time.

Therefore, we recommend the Executive for Research Services:

Recommendation 5: Update the Standard Operating Procedures for the National Archives at St. Louis for pulling and refiling records, including which fields are required to be completed.



APPENDIX A - OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of this performance audit was to evaluate the controls in place at selected NARA research rooms.

Scope

The scope of our audit covered internal controls, processes, and procedures related to NARA's research rooms that were in place from January 2024 through August 2025.

Methodology

We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards* (2018 Revision, Technical Update April 2021). Those standards require that 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We conducted the audit fieldwork in Alexandria, Virginia; Atlanta, Georgia; Kansas City, Missouri; Riverside, California; Simi Valley, California; Yorba Linda, California; St. Louis, Missouri; College Park, Maryland; Washington, D.C.; and remotely from September 2024 through August 2025.

To accomplish our audit objectives, we completed the following procedures:

- Conducted interviews with relevant NARA officials throughout all phases of the audit to gather information relevant to NARA research room activities.
- Inspected applicable NARA policies and procedures related to research room activities, including, but not limited to:
 - o Archives 1400, Chapter 7. Reference Services (July 2024)
 - o NA Form 14001: Reference Service Slip
 - o NA Form 14001: Procedures at Presidential Libraries
 - Standard Operating Procedures for Field Units: Pulling and Refiling Records (SOP) (July 2023)
 - o Research Room Rules
- Selected a non-statistical sample of 10 NARA research facilities and Presidential
 Libraries to conduct site visits and in-depth reviews of the specific facilities and research
 rooms and evaluate the effectiveness of controls related to researchers, staff, and
 document-handling. To select the sample of research facilities and Presidential Libraries,
 we identified the population of NARA facilities containing research rooms. We identified
 geographic locations with both research facilities and Presidential Libraries and selected
 locations that would allow us to visit a diverse set of facilities. The results from nonstatistical samples cannot be projected to the population of research facilities and
 Presidential Libraries.
- Visited one of the 10 selected facilities to develop the audit methodology to be
 performed at the remaining nine facilities. Then we visited the remaining nine selected
 facilities to observe the research room and interviewed NARA personnel to determine
 how the research room was operating and whether the research room complied with
 applicable policies and procedures.



Selected a non-statistical sample of pull slips at 9 of the 10 selected facilities to determine if NARA personnel followed proper procedures regarding pull slip completion and approval of the researcher to view the requested records. To select the sample of pull slips, we requested that each facility provide us with copies of pull slips from January through December 2024.² We then non-statistically selected two pull slips for each month from January through November and three pull slips for December. We used this sample design because the majority of the facilities only maintain copies of the pull slips in paper form, so we were unable to use electronic means to select a sample. The results from non-statistical samples cannot be projected to the population of pull slips.

We assessed internal controls that we deemed to be significant to the audit objective. Specifically, we assessed 12 of the 17 principles associated with the 5 components of internal control defined in the Government Accountability Office's (GAO's) *Standards for Internal Controls in the Federal Government* (September 2014) (the Green Book). Table 4 summarizes the principles we assessed:

Table 4: GAO Green Book Assessment Principles

Control Environment

Principle 3: Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.

Principle 5: Management should evaluate performance and hold individuals accountable for their internal control responsibilities.

Risk Assessment

Principle 7: Management should identify, analyze, and respond to risks related to achieving the defined objectives.

Principle 8: Management should consider the potential for fraud when identifying, analyzing, and responding to risks.

Principle 9: Management should identify, analyze, and respond to significant changes that could impact the internal control system.

Control Activities

Principle 10: Management should design control activities to achieve objectives and respond to risks.

Principle 11: Management should design the entity's information system and related control activities to achieve objectives and respond to risks.

Principle 12: Management should implement control activities through policies.

Information & Communication

Principle 13: Management should use quality information to achieve the entity's objectives.

Principle 14: Management should internally communicate the necessary quality information to achieve the entity's objectives.

Monitoring

Principle 16: Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

Principle 17: Management should remediate identified internal control deficiencies on a timely basis.

We assessed the design, implementation, and/or operating effectiveness of these internal controls and identified deficiencies that we believe could affect NARA's ability to effectively manage the research room activities. We discuss the internal control deficiencies we identified in the Audit Results section of this report. However, because our review was limited to aspects

² Archives I provided pull slips for FY 2024 rather than calendar year 2024. As a result, we selected 6 samples from calendar year 2023 (October through December).





of these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this performance audit.



APPENDIX B - MANAGEMENT RESPONSE

Agency management stated their general agreement with the findings and recommendations and opted not to provide formal comments for inclusion in this report.



APPENDIX C - ACRONYMS

Acronym	Definition
CMRS	Case Management Reporting System
FY	Fiscal year
GAO	Government Accountability Office
NARA	National Archives and Records Administration
NPRC	National Personnel Records Center
OIG	Office of Inspector General
SOP	Standard Operating Procedure



APPENDIX D - OIG HOTLINE CONTACT INFORMATION

The OIG Hotline provides a confidential channel for reporting fraud, waste, abuse, and mismanagement to the OIG. In addition to receiving telephone calls at a toll-free Hotline number, we also accept emails through an online referral form.

Visit https://naraoig.oversight.gov/ for more information, or contact us:

Contact the OIG Hotline

Online Complaint Form | Office of Inspector General OIG

Contact the OIG by telephone and FAX

Home Telephone: 301-837-3500 (Local) or 1-800-786-2551 (toll-free)

FAX: 301-837-3197

Contractor Self-Reporting Hotline

As required by the Federal Acquisition Regulation, a web-based form allows NARA contractors to notify the OIG, in writing, whenever the contractor has credible evidence a principal, employee, agent, or subcontractor of the contractor has committed a violation of the civil False Claims Act or a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations in connection with the award, performance, or closeout of a contract or any related subcontract. The form can be accessed through the OIG's home page or found directly at OIG Contractor Reporting Form | Office of Inspector General OIG