
NOTE: *Portions of this Audit Report concerning intra-agency deliberative information have been redacted.*

Office of Inspector General

**Evaluation of NARA's
Affiliated Archives Program**

Report No: 06-10

August 9, 2006

Executive Summary:

The National Archives and Records Administration (NARA) Office of the Inspector General (OIG) performed an audit of NARA's Affiliated Archives Program. The dual purpose of the audit was to determine whether (1) the Affiliated Archives Program is meeting its intended goal and function, and (2) affiliate archives participants were complying with management controls and ensuring that NARA records were properly accounted for and appropriately secured.

NARA's affiliated archives, through a formal Memorandum of Understanding (MOU), agree to house, maintain, and service NARA records in accordance with pertinent Federal laws and appropriate NARA regulations and archival and facility standards. The affiliates are responsible for all costs for establishing and maintaining the records and archival facility. According to the Deputy Archivist, the Affiliated Archives Program grew out of a Congressional mandate that created the Oklahoma Historical Society affiliate. Furthermore, NARA determined that affiliated archives were the only way to gain access to specific collections of accessioned records held outside of agency facilities. Initially, the relationships between NARA and the affiliates were strained. However with the passage of time, the Affiliated Archives Program has facilitated mutually beneficial and positive partnerships between NARA and the affiliates. The foundations of such relationships lie in the affiliates' genuine and constant efforts to service NARA's records to the best of their abilities given today's environment of severely limited resources.

While conducting the review, the auditors identified that while the Affiliated Archives Program is meeting its intended goal and function to a measured degree, opportunities exist to improve upon and expand the program to provide the American public with even greater access to NARA records. There are currently at least fifteen entities that have expressed interest in the program, including the Central Intelligence Agency and the District of Columbia National Guard. However, the former archivist's administration directed the program not be expanded to encompass these entities nor marketed to other organizations such as State Archives, Colleges, and Universities that store historical documents. The current Archivist of the United States, Professor Allen Weinstein, has taken a markedly different posture and directed NARA staff to pursue new affiliated relationships as NARA moves to form partnerships with others in the archival community.

The evaluation identified that while NARA has improved management oversight over the Affiliated Archives Program, opportunities exist to strengthen internal controls to ensure that records are protected from damage and loss. Specifically, our review disclosed two critical conditions that adversely impact the program.

- Outdated MOUs exist that govern the relationships between NARA and the respective affiliates. Individual affiliates are held to inconsistent requirements and standards for housing and maintaining holdings.
- With the exception of one of the existing eight affiliated archives, all failed to meet the current NARA Archival Storage Standards.

NARA records are presently held at only a limited number of affiliates. These facilities do not consistently meet preservation standards and agreements are outdated. Program expansion would further meet NARA's mission of providing ready access to our holdings. However, physical and environmental controls must be standardized and adequate to protect records from degradation or loss so that they can be viewed by future generations. To address this condition, this report contains six recommendations that, upon adoption, will help ensure that NARA records are protected while improving access through additional partnerships.

Background:

The Archivist of the United States is authorized to establish affiliated archives pursuant to 44 USC § 2107(3). Specifically, the Archivist may direct and effect, with the approval of the head of the originating agency, the transfer of records, deposited or approved for deposit with the National Archives of the United States to public or educational institutions or associations; title to the records to remain vested in the United States unless otherwise authorized by Congress. Thus, an “Affiliated Archive” is a public or educational institution or association that holds and maintains physical custody of records that are accessioned into the legal custody of NARA. These entities act as agents for NARA and perform access, reference, and other archival functions.

There are currently eight affiliated archives. The Affiliated Archives Program offers an alternative to the usual physical transfer of permanent historical records into a NARA facility from the creating agency by instead permitting the records to be maintained and made available to the public at a non-NARA facility by non-NARA staff.

NARA 1501, Custody of Federal Records of Archival Value, dated February 28, 2003, addresses the authority and responsibility of the Archivist regarding the physical and legal custody of Federal records determined to have sufficient historical value to warrant their continued preservation. It also contains provisions for the deposit of records of archival value outside the physical custody of NARA. According to section 1501.10, the Archivist uses six criteria to determine whether it is in the public’s interest to establish an affiliated archive. Affiliates must:

1. Provide specialized public access to the records and the information in the records beyond what NARA provides;
2. Demonstrate an institutional commitment to the long-term preservation of the records. They must store and maintain records under preservation conditions that are at least equal to those that would be provided by NARA;
3. Demonstrate the capability to protect the information in the records in accordance with the Freedom of Information Act;
4. Agree to follow NARA reference, arrangement, description, preservation, and security guidance;
5. Agree to permit NARA to examine the records and review how they are being managed, preserved, and made available for research; and
6. Agree to notify NARA as early as possible of any substantial risk that they might not be able to continue to preserve or provide access to the records.

NARA 1502, Procedures for Processing Proposals for Affiliated Archives, issued on May 31, 2005, provides procedures for evaluating proposals to establish new affiliated archives. The directive includes the various responsibilities of the Archivist, Deputy Archivist, Office of Regional Records Services, General Counsel, and Office of Records Services – Washington, DC.

Once an affiliate completes the proposal process and is approved to be an affiliated archive a Memorandum of Understanding (MOU) is drafted. The MOU is the formal document that describes the agreement between the two parties. NARA has the responsibility to evaluate how well an affiliated archive is meeting its responsibilities under the MOU. Several NARA units (NW, NA, NR, and NH) share the responsibility for monitoring and providing guidance to the affiliated archives.

Objective, Scope, and Methodology:

The overall objective of this project was to determine whether the Affiliated Archives Program was meeting its intended goal and function. We also sought to determine if program participants were complying with management controls and to ensure that NARA records were properly accounted for and appropriately secured. The review was conducted at Archives II in College Park, MD, within the Office of Regional Records Services (NR) and the Office of Records Services (NW). NARA Officials in the Office of the Assistant Archivist for Administration (NA) and the Office of the General Counsel (NGC) were interviewed to determine their roles in the Affiliated Archives Program.

We visited four of the eight affiliated archives to determine if they were functioning as intended and to assess whether records were properly accounted for and secured.

We visited:

- The William W. Jeffries Memorial Archives, U. S. Naval Academy, in Annapolis, Maryland,
- Oklahoma Historical Society in Oklahoma City, Oklahoma,
- Government Printing Office in Washington, D.C., and
- The Library of Congress in Washington, D.C., which holds records of the National Park Service.

The chart on the next page shows the affiliated archives, their year of affiliation, the cubic footage of NARA records held at the facility, and the type of records held. The facilities visited during this review held 68 percent (9,751 cubic feet/14,295 cubic feet) of NARA's records held at the affiliated archives.

| NARA's Affiliated Archives as of September 30, 2005 | | | |
|---|---------------------|-----------------------------|--|
| Affiliate | Year of Affiliation | Holding (c.f.) ¹ | Type of Records |
| US Military Academy | 1953 | 2,500 | Records of the Academy |
| US Naval Academy | 1985 | 2,256 | Records of the Academy |
| National Park Service/ Library of Congress | 1975 | 3,595 | HABS/HAER ² Records |
| Oklahoma Historical Society | 1978 | 2,100 | Records of the Five Civilized Tribes |
| Pennsylvania State Archives | 1995 | 1 | John F. Hartranft Papers |
| New Mexico State Records Center and Archives | 1972 | 142 | General Land Office Records called the "Spanish Land Grant Archives" |
| Yellowstone National Park Archives | 1978 | 1,901 | Records of the Park |
| Government Printing Office (GPO) | 2003 | 1,800 ³ | Records of the GPO, content on GPO Access |
| Total | | 14,295 | |

To accomplish our objectives we reviewed NARA guidance pertaining to the Affiliated Archives Program. We held discussions with NARA officials and reviewed pertinent documentation to determine whether NARA has adequate resources to operate the Affiliated Archives Program. The review also assessed whether management controls for the affiliated relationships were adequate. The evaluation was performed in accordance with Generally Accepted Government Auditing Standards.

¹ c.f. is an abbreviation for cubic feet.

² Historic American Building Survey (HABS)/Historical American Engineering Records (HAER)

³ GPO holds 180 gigabytes of records. A gigabyte of records equals approximately 10 cubic feet. Thus 180 gigabytes equals approximately 1800 cubic feet.

Findings:**The Affiliated Archives Program can be Expanded**

NARA has not taken the opportunity to expand the Affiliated Archives Program. This condition exists because the former administration reportedly was adverse to establishing additional affiliated agreements with external entities. The current Archivist has indicated his support for expansion of the Affiliated Archives Program to facilitate the Public's ability to view historical documents in topical locations. This would help NARA in meeting its core mission of making records readily accessible to our customers to include the American Public.

There are fifteen entities that have expressed interest in becoming an affiliated archive. (See listing in Appendix A on page 15). These entities approached NARA about becoming affiliates, but until recently NARA was not able to receive and process applications for the program. Under the former Archivist, NARA officials were instructed by the Director of Policy and Planning Staff (NPOL) not to pursue any new affiliated relationship. This policy was defined for more than five years because the former Director of NPOL thought that the Records Management Initiative needed to be completed and rolled out before NARA could decide how and when to consider new candidates for the Affiliated Archives Program. The current Archivist has defined his view that the Affiliated Archives Program can be marketed more effectively, and State Archives, Colleges and Universities, and other entities that store historical documents should be considered for program expansion.

Currently, the U.S. Geological Survey is the only potential affiliate undergoing the application process. The Military History Institute and United States Patent and Trademark Office expressed interest in the program in calendar year 2005. Both were sent information on how to apply to the program. The other twelve entities have not re-initiated contact with Affiliated Archives Program staff and the staff has not pursued the affiliated relationships due to prior program direction.

While NARA officials responsible for the Affiliated Archives Program agree that the program can be expanded, they expressed concern about resources to monitor the program should it grow. At NARA headquarters there are primarily two staff members that work with the Affiliated Archives Program. They are also responsible for monitoring 17 records centers, 14 regional archives, and 9 affiliated archives.⁴ They feel that not adding additional resources to the program may limit the effectiveness of the oversight required for the program.

⁴ The nine affiliated archives include the current eight affiliates as well as the U. S. Geological Survey affiliate applicant.

Recommendation:

1. The Archivist of the United States should continue in his efforts to support expansion of the Affiliated Archives Program.

Management Comments

Management concurred with this recommendation stating that they will continue to make individual decisions about this program as opportunities for new affiliates arise.

Marketing of the Affiliated Archives Program Needs to Improve

With the exception of having links on NARA's website for each of the existing affiliates, we found that NARA does not effectively market its Affiliated Archives Program, in part due to past program direction. As a result, individuals visiting the affiliated archives are not aware of the relationship between NARA and the affiliate or that a portion of the records housed at the affiliate are NARA records.

NARA has not created brochures or signage or conducted outreach to potential affiliates, such as colleges and universities or states. NARA's affiliated archives website also does not discuss the advantages of being in the Affiliated Archives Program.

When the auditors visited the affiliates, with the exception of the U. S. Naval Academy, there were no signs indicating that the facility was an affiliate of the National Archives. The Naval Academy had a plaque displayed in the research room area that dedicated the library as the William W. Jefferies Memorial Archives. The plaque states in part "Professor Jefferies integrated these archives into the National Archives of the United States. He thereby made the historic record of this institution an inseparable part of the official written and visual documentation of the nation's past."

By reading the plaque, visitors to the Academy know that there is an association/partnership between the U. S. Naval Academy and the National Archives. The picture on the next page shows the plaque as it is displayed at the Naval Academy's Affiliated Archives.



One of the affiliated facilities visited was also an affiliate of the Smithsonian Institution. The auditors obtained a brochure from the affiliate, which described the affiliate's history and services offered. The brochure also indicated that the affiliate was a member of the Smithsonian Affiliate Program. The brochure was utilized to market the affiliate and to obtain membership funds for the affiliate and the Smithsonian Affiliate Program. Although NARA's Affiliate Program is not structured to accept membership fees, a brochure describing the Affiliate Archives Program, the affiliates, and the respective regions would increase public awareness of the program and NARA as a whole. The Assistant for Operations, NR stated that NR has set aside monies to develop an affiliated archives brochure this year, but it may have to be developed next year because their current priority is a regional archives system brochure.

Recommendation:

2. The Archivist of the United States should publicize the Affiliated Archives Program through the use of brochures, signage and similar devices.

Management Comments

Management did not concur with the recommendation stating NARA's resources are limited, and management must use them to the agency's greatest benefit. Decisions on publicizing the affiliated archives program or any other NARA program are made by management based on identified priorities.

OIG Response

The Archivist of the United States has stated that increasing partnerships with the Agency is a priority. The OIG believes that publicizing the existing relationships with the Affiliated Archives is in direct line with the Archivist vision for the Agency and should be considered a priority.

Outdated MOUs put NARA Records at Risk

The MOUs that govern the relationships between NARA and the affiliates lack uniformity and required information is not included in all MOUs. Program officials interviewed conveyed their belief that MOUs could not be modified once agreed to by the parties. They also defined that should NARA attempt to revise the MOUs to require heightened controls over holdings, some affiliates would balk and no longer opt to remain program participants. According to OMB Circular A-123, "Management's Responsibility for Internal Control," management has a fundamental responsibility to develop and maintain effective internal control. The Circular adds that continuous monitoring and testing of controls should help to identify poorly designed or ineffective controls. Inconsistent language in MOUs specific to internal controls over holdings at the same time has resulted in NARA holding some affiliates to more stringent standards than others and affiliated archival facilities not adhering to NARA Standards. Thus, holdings housed at affiliated archives may be at risk for loss or damage.

NARA's relationships with the affiliated archives are governed by a MOU. A MOU is a legal document describing an agreement between parties. It is not a contract, but frequently a precursor to one. Each affiliate has its own MOU that was created when the affiliate was established. The establishment of the affiliated archives relationship ranges from 1953 to 2003. Thus the MOUs were drafted at different times and are not consistent from one to the next. Also, there is no formal mechanism or procedure to update MOUs. Discussions between the OIG Counsel and NGC disclosed that the MOUs between NARA and affiliated archives facilities could be updated to reflect the most recent iteration of NARA policy on holdings security and preservation. During the 50 years that the affiliated archives have been in place, technological advancements in the areas of preservation and security over records have occurred and the MOUs have not been updated to incorporate these advancements.

Affiliates are held to differing standards

Inconsistent and non-uniform MOUs have resulted in affiliates being held to different standards. For example, research has shown that temperature and relative humidity are the most significant factors in preventing chemical damage to records. Specifically, damage to poor quality paper can be seen after 60 years when the holdings are stored at 65 degrees and 45 percent humidity, but the same paper would not show signs of deterioration for 120 years if stored at 60 degrees and 35 percent humidity. NARA officials are aware of the importance of temperature and humidity to the preservation of records and require that NARA archival facilities adhere to a maximum of 65 degrees and 35 to 45 percent humidity to ensure deterioration of paper based records will not show for 85 years. However, they have not required the affiliated archives to adhere to similar standards. During the course of our review we found that two affiliates, per the MOUs, were not required to store the records at a specific temperature and humidity level. At the remaining six affiliated archives, based upon the existing MOUs, records at four affiliates could be expected to show signs of deterioration in 39 years, one in 44 years and one in 85 years. The latter site, The Government Printing Office is the only one that currently meets NARA standards for temperature and humidity per the MOU. (See Appendix B on page 16).

Other inconsistencies found in the various MOUs during our review included: different inspection requirements; a statement that requirements for physical protection are subject to change; and the requirement for a disaster plan. Specifically, the Government Printing Office, National Park Service, and New Mexico Records Center and Archives MOUs state that records could be examined or inspected at anytime, while the other five MOUs required that NARA make an annual inspection.⁵

Although affiliated archives program officials believed that the MOUs could not be changed, the Pennsylvania Historical and Museum Commission's MOU stated that the requirements for physical protection are subject to change. This was the only MOU that clearly states that the requirements for protecting the records could be changed by NARA.

The Pennsylvania Historical and Museum Commission's MOU was also the only MOU that specifically required a disaster plan. NARA 1561, Records Emergency Preparedness and Recovery in NARA Facilities, provides policy to prevent or minimize damage to records for which there is a threat of damage or loss by water, fire, chemical or biological contamination, or other causes. If records emergency preparedness is not included in the MOUs, NARA cannot hold affiliates responsible for planning to prevent or to minimize threats to NARA records.

⁵ NARA 1501, Custody of Federal Records of Archival Value, states that the affiliate must permit NARA to examine the records and review how they are being managed, preserved, and made available for research. Thus, it is NARA's practice to visit the affiliates on an annual basis.

NARA 1561 also requires notification procedures and contact information for reporting a potential threat, an existing threat, or damage to records (24 hours/day; 7 days/week) to be included as an element in a records emergency response and recovery plan. For example, at the United States Military Academy in West Point, New York, there was a small fire on the affiliate's roof. Appropriate NARA staff were not notified of the fire or potential damage to the records by the affiliate. NARA staff became aware of the fire through a news report. If the affiliate was operating under NARA's policy for records emergency preparedness and recovery, they would have been required to report the incident to NARA staff. Although there was no damage to NARA's records the affiliate should have called NARA staff to report the incident.

We also found that none of the MOUs mentioned the policy and procedures for use of the NARA Seal. NARA 102, Use of Official NARA Seals, requires that "any time NARA enters into agreements with external organizations or individuals; there must be a clause in the written agreement specifically stating that the external organizations or individuals must obtain prior written approval from NARA before using NARA seals for any purpose." Although we did not find instances where the NARA seal was misused during our review we believe the clause should be added to the MOUs to protect NARA from potential misuse of its seal.

Although the relationships between NARA and the affiliates have improved dramatically over the years, NARA program officials believe any attempt to change the MOUs would sour the relationships and result in affiliates no longer wanting to be part of the program. If affiliates left the program this would result in decreased access to records and increased costs to NARA. Discussions with NGC revealed that it is within NARA's authority to appropriately update MOUs between NARA and the affiliates as necessary.

Furthermore, according to NARA 1501, the Office of Administrative Services is required to support NR and NW in monitoring facilities to determine if the affiliated archives are meeting their responsibilities under the MOU. After conducting a field visit to the Oklahoma Historical Society, the Agency Security Officer recommended the MOU should be updated to incorporate current security advancements since a new building was under construction. However, other program officials believe MOUs should not be modified at the risk of losing participation in the Affiliated Archives Program. The Agency Security Officer was told that the MOU could not be updated. Based on this information he stated he would no longer perform visits of the affiliated archives because the affiliates were resistant to his review recommendations. He felt that conducting the reviews would be a waste of resources for his staff because the recommendations they would make would be based on current security guidelines and standards.

Affiliates do not meet Archival Storage Standards

Inconsistent MOUs have contributed to NARA affiliates not meeting current archival storage standards. Specifically, seven of eight affiliates assessed do not consistently meet NARA's Archival Storage Standards. Responsible NARA officials have not taken appropriate measures to ensure that affiliated archives meet the applicable standards because they believed that the MOUs should not and could not be changed. This belief resulted from the history of the Affiliated Archives Program that began with contentious relationships. The storage requirements in the MOUs are not in agreement with the current archival storage standards. NARA 1501, Custody of Federal Records of Archival Value, states that custodians of NARA records must store and maintain records under preservation conditions that are at least equal to those that would be provided by NARA. NARA 1571, Archival Storage Standards, establishes structural, environmental control, fire safety, preservation, and security standards for appropriate storage conditions in NARA archival facilities. As a result of not being stored in facilities that meet the Archival Storage Standards NARA records are at risk of damage or loss.

NARA's fourth Strategic Goal is to ensure that "all records are preserved in an appropriate environment for use as long as needed" and to that end NARA is requiring that their facilities meet the appropriate standards by FY 2009. However, as shown in Appendix C on page 17, six of the eight facilities are not storing records at the required environmental levels. NARA 1571 Appendix A, specifies the maximum acceptable temperatures and relative humidity in areas where records are stored, processed, exhibited, or used. The directive also states facilities holding NARA archival records should "use cooler temperature and drier relative humidity set points whenever possible, as these conditions extend the life and significantly enhance the preservation of records." As the chart in Appendix B reflects, this is not currently happening.

The auditors observed or were told about affiliated archive facilities non-compliance with the Archival Storage Standards. These instances on non-compliance include:

- The U. S. Naval Academy Affiliated Archives does not have sprinklers in the stack area and the stack area floor does not meet the floor load limit;
- The New Mexico State Records Center and Archives filters out carbonyl sulfide and carbon disulfide instead of the pollutants required to be filtered by NARA facilities; and
- The Government Printing Office does not have a fire suppression system and the individual server cabinets were not locked.



Server at the Government Printing Office where NARA records are held.

As evidenced by the preceding examples, NARA officials have knowingly allowed records to be stored at facilities that do not meet current standards. The Senior Archivist for Affiliated and Regional Archives stated there is no incentive for the affiliates to adhere to the current standards for the following reasons: The records held in the affiliates are highly utilized and referenced at the various locations. The records at some affiliates are cataloged and indexed better than records at NARA facilities. The affiliates do not have the finances to adhere to the standards and the alternative is to bring the records back to NARA where the Archival facilities also do not currently meet the standards.

NARA and other organizations change policies and procedures on a regular basis to keep up with changing standards and technologies; therefore it is not unreasonable to have the affiliates keep up with appropriate environmental and security standards. Having differing and outdated MOUs results in affiliates not following approved NARA policy and taking advantage of advancements that help to preserve records. Furthermore, storing archival records in facilities that do not meet the published archival storage standards puts those records at risk.

Recommendations:

3. The Archivist of the United States should take appropriate measures to revise MOUs between NARA and the affiliates to incorporate current standards for housing NARA records.

Management Comments

Management concurred with the recommendation indicating that it should be NARA's goal to improve the housing of NARA records in affiliated archives, and that current MOUs can be revised, at the appropriate time, to incorporate 1571 standards.

4. The Archivist of the United States should ensure that there is a mechanism to update the MOUs. Specifically a procedure should be established to update the MOUs on an interim basis, or when new standards are implemented at NARA.

Management Comments

Management concurred with this recommendation. Analysis will have to be done on how and when to best update MOUs since this could be resource intensive for both NARA and the affiliated archives.

5. The Archivist of the United States should ensure that all MOUs contain the required clause for the use of the NARA seal.

Management Comments

Management concurred with the recommendation stating that as MOUs are updated the clause will be added.

6. The Archivist of the United States should ensure that all affiliates meet the current storage standards or provide waivers and/or timeframes to have the affiliates become compliant with the NARA 1571 standards.

Management Comments

[DELETED – 3 LINES] NARA should continue to encourage affiliated archives to meet 1571 standards as soon as possible.

| Entities with Interest in Affiliated Archives Program As of November 2005 |
|---|
| Potential Affiliates |
| Bureau of Land Management, Eastern States Office |
| Central Intelligence Agency |
| District of Columbia National Guard |
| Genealogical Society of Utah |
| Military History Institute |
| National Agricultural Library |
| National Maritime Museum |
| National Oceanographic and Atmospheric Administration |
| National Park Service-a number of the parks |
| NASA, Lyndon B. Johnson Space Center, University of Houston- Clear Lake Alfred R. Neumann Library (UHCL) |
| Securities and Exchange Commission |
| U. S. Geological Survey |
| U. S. Navy, Seabees |
| U. S. Patent and Trademark Office |
| Virgin Islands Territorial Government |

| Record Deterioration Rate by Affiliated Archive Based on Current MOU In Place | | | | |
|--|---------------------|-----------------|----------|---|
| | | Temperature | Humidity | |
| Affiliate | Year of Affiliation | Required by MOU | | Signs of Deterioration Seen After (Years) |
| US Military Academy | 1953 | 70° ± 4° | 50% ± 4% | 39 |
| US Naval Academy | 1985 | 70° ± 4° | 50% ± 4% | 39 |
| National Park Service/Library of Congress | 1975 | 6 | | |
| Oklahoma Historical Society | 1978 | 70° ± 5° | 50% ± 5% | 39 |
| Pennsylvania State Archives | 1995 | 70° ± 2° | 45% ± 5% | 44 |
| New Mexico State Records Center and Archives | 1972 | 7 | | |
| Yellowstone National Park Archives | 1978 | 70° ± 5° | 50% ± 5% | 39 |
| Government Printing Office | 2003 | 65° | 35% ± 5% | 85 |

⁶ MOU did not contain a requirement to store records at a specific temperature and humidity.

⁷ MOU did not contain a requirement to store records at a specific temperature and humidity.

| Status of Affiliated Archival Facilities Compliance with the Archival Storage Standards as of January 2006 | | | | |
|---|-----------------|-----------|------------------|---|
| Affiliate | Holding (cf) | Compliant | Not Compliant | Reason for not being Compliant |
| US Military Academy | 2,500 | | X | MOU allows records to be stored at a temperature higher than allowed by standard |
| US Naval Academy | 2,256 | | X | MOU allows records to be stored at a temperature higher than allowed by standard, no sprinklers in the stack area, and floor not at proper load limit. |
| National Park Service/Library of Congress | 3,595 | X | | |
| Oklahoma Historical Society | 2,100 | | X | MOU allows records to be stored at a temperature higher than allowed by standard |
| Pennsylvania State Archives | 1 | | X | MOU allows records to be stored at a temperature higher than allowed by standard, no environmental monitors |
| New Mexico State Records Center and Archives | 142 | | X | Does not meet filtration standards, filters out carbonyl sulfide and carbon disulfide instead of sulfur dioxide, nitrogen dioxide, ozone, formaldehyde, and acetic acid. |
| Yellowstone National Park Archives | 1,901 | | X | MOU allows records to be stored at a temperature higher than allowed by standard |
| Government Printing Office | 1,800 | | X | No fire suppression in the main server room, back ups retained for 1 month vs. 2 months, No large scale uninterrupted power supply for the current server room and the individual server cabinets are not locked. |



National Archives and Records Administration

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Date: July 19, 2006
To: OIG
From: NR, NW, NA
Subject: Office Comments on Draft OIG Report 06-10, Evaluation of NARA's Affiliated Archives Program- Revision to July 14, 2006, comments.

NR, NW, and NA are collectively providing the following comments on the above draft OIG evaluation:

Recommendation 1. The Archivist should continue in his efforts to support expansion of the Affiliated Archives Program.

Six principal criteria are considered when making management policy decisions regarding this program. These six criteria are outlined in NARA 1501, Custody of Federal Records of Archival Value and reiterated in NARA 1502, Procedures for Processing Proposals for Affiliated Archives. Following this guidance, NARA will continue to make individual decisions about this program as opportunities for new affiliates arise.

Recommendation 2. The Archivist should publicize the Affiliated Archives Program through the use of brochures, signage, and similar devices.

We do not concur with this recommendation. NARA's resources are limited, and management must use them to the agency's greatest benefit. Decisions on the extent and form of publicizing this or any other NARA program are made by management based on identified priorities.

Recommendation 3. Revise MOUs to protect and house NARA records to 1571 Standards.

We agree that it should be NARA's goal to improve the housing of NARA records in affiliated archives, and that current Memorandum of Understandings (MOU) can be revised, at the appropriate time, to incorporate 1571 standards. The appropriate time, however, is when an affiliated archives either renovates its current facility, or builds a new one. [DELETED – 4 LINES]

A factor affecting both NARA and the affiliated archives is the large sum of money needed to upgrade existing facilities. Such large sums are as difficult for affiliated archives to obtain as it is for NARA.

Recommendation 4, mechanism to update MOUs:

We basically concur, although analysis should be done on how best and on when to update MOUs since this could be resource intensive for both NARA and the affiliated archives. There will also be political, legal, and relationship issues that will need to be carefully considered.

Recommendation 5. The Archivist should ensure that all MOUs contain the required clause for the use of the NARA seal.

We concur with this recommendation. As MOUs are updated, this clause will be added. It is important to note that in the interim, NARA regulations at 36 CFR 1200 regarding the seal are applicable to affiliated archives. We will also remind affiliates on this point.

Recommendation 6, NARA ensures all affiliate archives meet current standards or provides waivers:

Our response is similar to recommendation 3. [DELETED – 2 LINES] However, we agree that NARA should continue to encourage affiliated archives to meet 1571 standards as soon as possible.

Please contact Greg Pomicter or Jennifer Nelson if you have any questions.

THOMAS E. MILLS
Assistant Archivist for
Regional Records Services

Cc: NW, NA, NPOL