



National Archives and Records Administration

8601 Adelphi Road
College Park, Maryland 20740-6001

Date : January 15, 2009

Reply to

Attn of : Office of Inspector General (OIG)

Subject : Audit Memorandum No. 09-04, Regional Archives Compliance with Procedures for Controlling Specially Protected Holdings

To : Tom Mills, Assistant Archivist for Regional Records Services

The purpose of this audit memorandum is to inform you of regional archive non-compliance with procedures intended to provide additional protection to a sub-set of archival holdings known as Specially Protected Holdings. According to NARA 1572, Security for NARA Holdings, these holdings have been identified by NARA staff as especially vulnerable to theft because they have especially high historic or intrinsic value.

This audit was undertaken pursuant to audit work conducted by this office of the controls over Presidential Library (NL) textual records. While performing field work for the Presidential Libraries audit the OIG discovered the regional archives were not in compliance with several aspects of NARA 1572 relating to specially protected holdings. As a result, we performed audit work of Office of Regional Records Services (NR) processes relating to NARA 1572. Specifically, we met with staff from the Office of Regional Records Services in College Park, MD, and disseminated a questionnaire to each of the regional archives in order to obtain additional information about the level of regional archive compliance with procedures established in NARA 1572 for controlling specially protected holdings. We found regional archives had not performed the following activities relating to controls over specially protected holdings, as required by NARA 1572¹:

- Nominated selected staff for background checks required to access vaults or other specially protected areas (nominations to be sent to NASS);
- Reported their storage methods, exact container locations, and names of staff with access to Specially Protected holding to NASS, and;
- Performed annual inventories of specially protected holdings and provided the results to the Office Head.

NARA 1572 specifies NARA's policy on security for NARA holdings, including material identified as needing special protection. The Directive provides guidance for identifying those holdings that would benefit from special protection and also provides specific steps to be taken to (1) segregate these holdings from the general population; (2) control access to them, and; (3) account for them, as a means of providing additional safeguards.

¹ A table summarizing regional archive responses to the OIG administered questionnaire can be found as Appendix B of this audit memorandum.

As a result of these conditions NR lacks assurance that specially protected holdings are being controlled in a manner consistent with their value. We have made four recommendations that we believe, upon implementation, will address the weaknesses cited in this audit memorandum. Our findings and recommendations are presented in detail in Appendix A. Because of the limited audit work performed and the fact that similar findings concerning NL controls over Specially Protected Records have already been communicated to NL and the agency via audit report number 09-01, we chose the Audit Memorandum product to report out this audit activity.

This performance audit was conducted in accordance with generally accepted government auditing standards (GAGAS) between August 2008 and October 2008. These 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 evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We will look for your response on how you plan to implement our recommendations in 30 days. Should you have questions contact James Springs, Assistant Inspector General for Audits or me on 301-837-3000.

PAUL BRACHFELD
Inspector General

cc: Adrienne Thomas, Acting Archivist of the United States
Susan Ashtianie, Director, Policy and Planning Division

Report Audit Findings

Staff was not nominated for background checks and storage methods and container locations were not reported to NASS

We found twelve of the thirteen regional archives had neither (1) nominated staff for access to Specially Protected Holdings, nor (2) reported their storage methods and exact container location to NASS. Furthermore, we found that the level of background checks and the process by which they would be accomplished and communicated was not defined in NARA policy. We were informed by the Policy and Planning Staff (NPOL) that this specific information was not included in NARA 1572 because it was up to the Space and Security Management Division (NASS) to develop supplemental policy and procedures in this area. The Space and Security Management Division (NASS) stated they did not concur with this aspect of NARA 1572 and they did not intend to develop supplemental policy nor did they have the resources necessary to carry out additional tasks associated with specially protected holdings. We believe the level of background checks required, and the process by which they are accomplished, should be clearly articulated in either NARA 1572 or NASS supplemental guidance in order to add value to this requirement. NR should then ensure regional archives are compliant with the requirement.

We also found that while NASS had a review checklist based on NARA 1572 requirements, specifying they review and certify the SPR storage area(s), they had not yet performed any of the requisite reviews since the establishment of the requirement in January 2006. NASS stated they did not know when they would have the resources necessary to conduct such reviews or when these inspections would be completed. The OIG believes the information necessary to approve/initially certify SPR storage areas can be conveyed through the requirement that storage locations and methods be reported to NASS. NASS can use this information, supplemented by photos of the storage locations if necessary, to remotely review the storage areas and certify them (or communicate steps necessary to bring them into compliance) until such time as they are able to perform the required on site inspection.

Recommendation 1:

The Director for the Policy and Planning Staff (NPOL) should revise NARA 1572 to include specific information concerning the timing and level of background checks required for staff with access to specially protected holdings, or the Office of Administrative Services (NA) should ensure the Security Management Branch (NASS) develop standard operating procedures for background checks for those required to access specially protected holdings.

Recommendation 2:

The Assistant Archivist for Administrative Services (NA) should ensure the Security Management Branch (NASS) initially certifies designated SPR storage areas. If this cannot be done via on-site inspection because of time or budget constraints it should be done remotely through the exchange of information necessary to allow NASS to either certify the specially protected storage areas or communicate changes necessary to bring such holding areas into NARA 1572 compliance.

Recommendation 3:

The Assistant Archivist for Regional Records Services should ensure regional archives are in compliance with the revised procedures and defined requirements resulting from recommendation 1. Specifically, they meet the requirements for (a) nominating selected staff with access to specially protected holdings for background checks and (b) provide storage methods and container locations to NASS.

Regional archives have not conducted annual SPR inventories and transmitted them to NR in accordance with established requirements

Based on our survey results, five of the thirteen regional archives (38%) responded they had either not performed the annual inventory or had not performed the inventory in accordance with established guidelines (e.g. one region responded they performed the inventory on a bi-annual basis rather than annually). We attempted to obtain from NR the results of the annual inventories for FY 2007 and 2008 and were told that NR did not maintain the results. NR management officials stated their interpretation of the NARA 1572 requirement for transmitting results of the annual inventory to the Office Head allowed regions to certify such inventories were taking place via their annual program review reporting. NARA 1572 requires regional archives to maintain itemized lists of their unique record items requiring special protection, inventory 25% of these on an annual basis, and provide the results to the Office Head.

Recommendation 4:

The Assistant Archivist for Regional Records Services should ensure regional archives are annually inspecting 25% of their specially protected holdings, consistently and uniformly recording the results, and transmitting the information to the Office Head in accordance with NARA 1572. If regional archive self certification of compliance with the annual inventorying requirement contained in NARA 1572 is deemed to meet agency requirements that results are reported to the Office Head, then NR should establish a process by which a sample of actual inventory results are obtained and reviewed by NR annually as a control mechanism for ensuring (a) 25% of specially protected holdings are reviewed, (b) samples are rotated annually, and (c) unaccounted for items are properly reported and appropriate action is taken.

APPENDIX B

NOTE: The “X’s” in this appendix represent redactions done under FOIA Exemption “high” b(2) to protect predominantly internal information the disclosure of which significantly risks circumvention of agency regulations or statutes.

Regional Archive Responses to OIG Questionnaire

NR Regional Archives Compliance with Policy for Safeguarding Specially Protected Holdings							
Regional Archive	Storage methods and container locations reported to NASS	Received NASS concurrence – NASS inspected/certified storage areas	Staff authorized to access SPRs reported to NASS	Received NASS concurrence – Background check performed	Maintain itemized list of SPRs	Annually inventory SPRs	Provide results of inventory to Office Head
Northeast Region (Boston)	XX	XX	XX	XX	XX	XX	XX
Northeast Region (New York)	XX	XX	XX	XX	XX	XX	XX
Mid-Atlantic Region (Philadelphia)	XX	XX	XX	XX	XX	XX	XX
Southeast Region (Atlanta)	XX ^x	XX	XX ^x	XX ^x	XX	XX ^x	XX
Great Lakes Region (Chicago)	XX	XX	XX ^x	XX	XX	XX ^x	XX ^x
Central Plains Region (Kansas City)	XX	XX	XX	XX	XX	XX	XX
Southwest Region (Ft. Worth)	XX	XX	XX	XX	XX	XX	XX
Rocky Mountain Region (Denver)	XX	XX	XX	XX	XX	XX	XX

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