

NOTE: *Portions of this Audit Report revealing sensitive internal agency information, the disclosure of which would risk circumvention of an agency regulation or statute and increase NARA's potential vulnerability to some form of outside interference or harm have been redacted.*

**AUDIT OF MANAGEMENT CONTROLS
FOR SAFEGUARDING NARA'S SPECIALLY
PROTECTED RECORDS AND ARTIFACTS
STORED IN SECURED STACKS, VAULTS,
AND SAFES**

Audit Report No. 07-01

October 12, 2006

EXECUTIVE SUMMARY

The National Archives and Records Administration (NARA) Office of Inspector General (OIG) audited NARA's management controls for safeguarding specially protected records and artifacts stored in secured stacks, vaults, and safes. The objective of the audit was to determine whether controls were adequate to properly safeguard specially protected records and artifacts. NARA defines "specially protected records and artifacts" (SPRAs) as records and artifacts having considerable historical, intrinsic, legal, and/or monetary value, and are at the greatest risk of theft, especially for resale, that requires special protection. Currently, SPRAs are stored at NARA's College Park facility (Archives II), Presidential libraries, and records centers throughout the country.

We found that while NARA has established management controls at all locations included in our review, these controls were not always adequate to safeguard and secure SPRAs. Therefore, these items were at risk of loss or theft. Specifically, our audit disclosed the following:¹

- not all SPRAs have been identified;
- a complete list of SPRAs was not maintained by the b2
and
- access to records meeting the definition of SPRAs was not restricted to authorized archives operational staff;
- annual inspection procedures for large record series were inadequate to identify lost or missing documents;
- annual inspections of SPRAs were either not performed or not performed adequately.

The report contains five recommendations addressing our findings. Upon adoption, these recommendations will address internal control deficiencies defined in the report.

¹ Attachment A depicts NARA locations reviewed and weaknesses noted.

BACKGROUND

Archives 1400, Chapter 8, Security Procedures, documents safety and security procedures for records in the Office of Records Services – Washington, DC (NW) custody and 8 defines SPRAs as records and artifacts that are not security-classified but have considerable historical, intrinsic, legal, and monetary value. NARA procedures require SPRAs to be maintained in secured stack areas, vaults, or safes. At a minimum, these areas must have combination locks with access to the secured stack areas, vaults, or safes restricted to designated staff. Staff entering the stack or vault, or opening the safe must sign in and out on NA Form 14094, Specially Protected Areas Traffic Sheet. Lock combinations are changed when an authorized staff member leaves the unit or no longer needs to know the combination. A designated staff member must accompany other staff members working in the specially protected area. Annual inspections are to be performed by teams. The inspections, at a minimum, must include 25 percent of the artifacts and unique record items that are not part of a larger series and 5 percent of documents randomly selected, in each series.

NW 2004-11, Access to SPRAs in NW Custody, issued on May 14, 2004, superseded procedures in Archives 1400, Chapter 8, paragraph 43 and required that work in a specially protected stack, vault, or safe involve at least two staff members, one of whom is designated to receive the combination to the stack, vault, or safe. In addition, unit heads must submit a list of designated holders of combinations to specially protected areas to the Director of NW Operation Staff (NWA) by July 1 of each year so that the Deputy of NW can confirm designation status and update status information in the Security Management Branch (NASS).

The Office of Regional Records Services (NR) memo NR04-040, Increased Security Storage for Records of High Value, directed Regional Administrators to withdraw records with high value from regular storage areas and place them in a locking safe, secure vault, or cage area. The Regional Administrators and archival operations directors designate staff members to receive the combination or key to the stack, vault, or safe containing high value records. The memo required at least a two member team, one of whom is designated to receive the combination or key to the stack, vault, or safe, to work with the documents.

The Office of Presidential Libraries (NL), Presidential Libraries Manual, Libraries 1401, contains security and inventory procedures for SPRAs held by Presidential libraries. As authorized by the Director, staff members are permitted in archival storage areas to perform their official duties. Keys, swipe cards, and combinations to archival storage areas are issued to library personnel only when their duties require frequent admittance to those areas. Libraries 1401 does not require two people to be present when working in SPRAs storage areas. An authorized staff member is permitted to work alone with SPRAs. The cleaning staff may enter archival storage areas to perform their normal duties during office hours when a library staff member is present. Libraries 1401 requires Presidential libraries to annually inventory valuable items subject to theft. The

inventory is to be conducted by a two person team during the first quarter of each fiscal year.

SPRAs normally stored at the National Archives Building in Washington, DC, were stored in the vault at Archives II at the time of our review because the storage area in the National Archives Building in Washington, DC, was undergoing renovations. Access to the vault was limited to NW employees.

Objective, Scope, and Methodology

The objective of the audit was to determine whether management controls are adequate to properly safeguard SPRAs stored in secured stacks, vaults, and safes. Specifically, the audit assessed whether NARA is adequately identifying, controlling, and restricting access to specially protected items.

We examined secured stack areas, vaults, and safes; reviewed procedures in place to restrict access to authorized staff; traced items on the high value inventory list to the secured stack areas, vaults, and safes; traced items in the secured area back to the inventory list; and interviewed NARA headquarter staff at NR, NL, and Office of Records Services – Washington, DC, Access Programs (NWC). In addition we visited and interviewed staff at:

- Access Programs, _____ (NW(____)) at College Park, Maryland;
- Access Programs, _____ (NW(____)) at College Park, Maryland;
- Access Programs, _____ (NW____) at College Park, Maryland;
- Access Programs, _____ (NW____) at College Park, Maryland;
- _____ (NW____), Washington, DC;
- _____ Region _____ Archival Operations (NR____);
- _____ Region _____ Archival Operations (NR____);
- _____ Region _____ Archival Operations (NR____);
- _____ Presidential Library (NL____);
- _____ Presidential Library (NL____);

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The auditor used judgmental sampling in selecting items to trace between the inventory documentation and items stored in secured locations. The audit was performed in accordance with generally accepted government auditing standards.

Findings

Not all Archival Records have been Reviewed for SPRAs

The current process for identifying SPRAs does not ensure that these items will be identified. Because of time, resource, and budget constraints management has elected to use a process that does not ensure that all SPRAs will be identified. NARA regulations, Archives 1400, Chapter 8, Security Procedures, NR04-040, Increase Security Storage for Records of High Value, and Libraries 1401, Chapter 8, Preservation and Security requires management to review its records, pull out SPRAs, and secure these records and artifacts. However, if all archival holdings have not been reviewed for SPRAs, staffs cannot give assurance that all of their SPRAs have been identified and stored in a secure location to prevent theft or loss.

The current process for identifying SPRAs requires the archivist to make a determination of the likelihood that records contain SPRAs when they are accessioned into NARA. Archivists review the accession documentation, open the boxes, and review by folder topic the contents of the boxes. Accessions determined likely to contain SPRAs are given priority for a detailed review. Accessions determined unlikely to contain SPRAs are given a lower priority and filed in the archival stacks. Unless a request is made for the lower priority records by a researcher or preservation, microfilming, digitizing, or other work is scheduled, a detailed review of all pages is unlikely to be performed.

Our review identified five locations where not all archival holdings have been reviewed for SPRAs. The locations were:

The Director of NWC, two Regional Directors, and three Presidential library Directors were asked if all their archival holdings have been reviewed for SPRAs. Four responded in the negative stating that their resources were insufficient to review all archival holdings and to perform other high priority duties.

The Director of NWC stated, "We cannot look into every box in the 2 million cubic feet in NW's custody to determine if there are high value items in them. If we were to spend one hour per box, this project would take 3,000 staff years. When series likely to contain high value items are accessioned, they move to the front of the processing workload and NW staff ensures the high value items they contain are identified and properly secured."

NL staff stated that the Library holds over 24,000 boxes of Presidential records, personal papers, papers, and other personal paper collections. Also, the staff noted that approximately 15 percent of the Presidential record collection (including the President's handwriting file) and 35 percent of the personal paper collections boxes had been reviewed in such a manner that would identify high value documents. Access to the archival stack areas is restricted. The staff did not

feel it would be an efficient use of staff resources to open the remaining boxes at this time. They estimate that it would take the archival staff at least ten years to conduct such a search (assuming three FTEs were dedicated to it at any given time). According to management, the [redacted] Library has given higher priority to reducing their backlog of

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Freedom of Information Act requests with an approximate volume of two million pages; preparing approximately eight million pages containing national security classified information for the Remote Access Capture project; and continuing the arrangement and description of the remaining [redacted] personal paper collections.

The Director of Archival Operations, [redacted] stated the National Archives at [redacted] has not opened and examined all archival holdings records boxes to identify high value documents and items. When a record series is identified as potentially having intrinsically valuable records, it requires a labor intensive and time consuming page-by-page review of the series.

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The Director of [redacted] stated that there probably were some valuable documents in the archival holdings, but the region does not have the resources to perform a page-by-page review.

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Recommendation 1:

The Assistant Archivists for the Office of Regional Records Services (NR), Presidential Libraries (NL), and Records Services – Washington DC (NW) should review and revise where necessary, the current process for reviewing all archival record holdings.

Management Comments:

Management concurred with the finding and recommendation.

List of SPRAs not Maintained

A complete list of SPRAs was not maintained by _____ Region.

_____ (NR _____ and _____ Region _____). The two archival operations staffs interpreted NR guidance as only requiring a list of SPRAs stored in their safe as opposed to a complete list of all specially protected records. NR memorandum NR04-040, Increased Security Storage for Records of High Value, requires that all records with high value be withdrawn from regular storage areas and placed in a specially protected area. An NR notice entitled "NR Security Protocol" requires that each region maintain a secure list or notebook of photocopies that identifies and describes a region's records at the highest risk for theft. As a result of not maintaining a complete list, theft or damage to SPRAs may go undetected. b2

We reviewed the lists of SPRAs stored in cages, vaults, and safes of three regional records centers, three Presidential libraries, and five NW offices. Nine offices had a complete list of SPRAs. However, the NR _____ and NR _____ list of SPRAs were not complete. SPRAs not stored in their safes were not on their lists of SPRAs. b2

When asked for a list of all their SPRAs, the staffs of NR _____ and NR _____ provided a list of the items contained in the safe. When asked why the SPRAs not in the safe were excluded from the list the staff said they were not aware that they were required to be included. The staffs interpreted NR04-040 as requiring a list of SPRAs withdrawn from the stacks and maintained in the safe. The lack of compliance with NR04-040 documentation requirements adversely impacts the accountability and related security over SPRAs. b2

When we brought this matter to the attention of the Assistant for Operations, Office of Regional Records Services, he agreed that the list of SPRAs should include all items including those not stored in the safe.

Recommendation 2:

The Assistant Archivist for the Office of Regional Records Services (NR) should ensure that regional records operations maintain a complete list of all SPRAs including those that are not removed from the stack shelves.

Management Comments:

Management concurred with the recommendation and initiated management action.

Access to SPRAs was not Restricted

Access to SPRAs was not restricted to authorized archives operational staff at three of eleven offices reviewed. This condition existed because management did not have sufficient secured protected areas to store and restrict access to these records and artifacts. NR04-040 requires SPRAs to be maintained in special stack areas, vaults, or safes. Thus, NARA is not in full compliance with provisions of NR04-040.

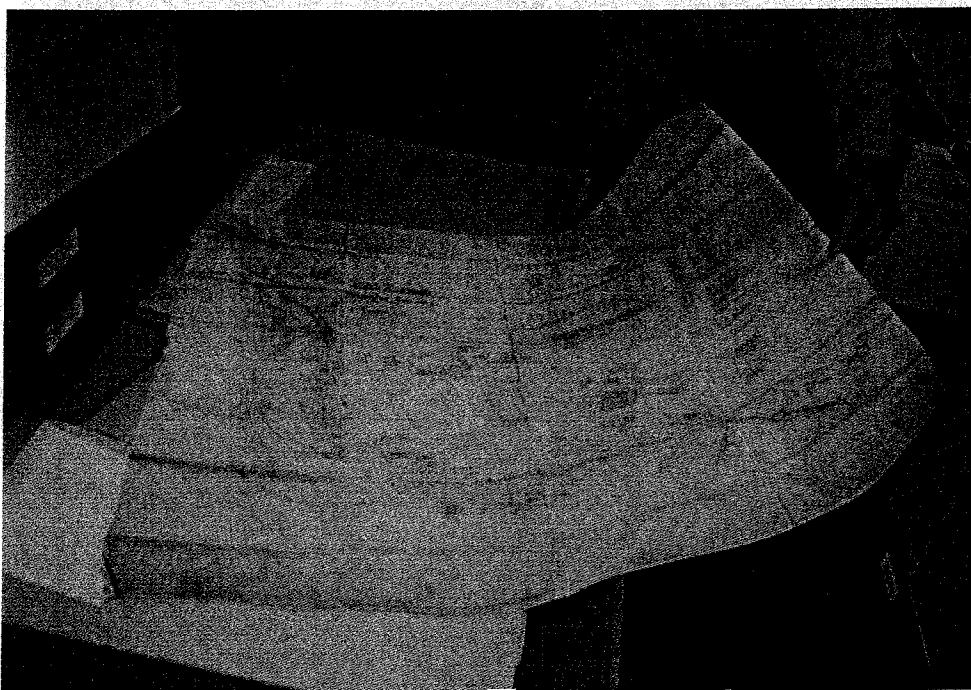
We reviewed the storage of SPRAs in secured protected areas at three Presidential libraries, three regional records centers and five NWC offices. Our review found SPRAs at the Presidential libraries and the five NW offices were stored in secured safes, vaults, locking cabinets, and cage areas. The Presidential libraries vaults and secured storage rooms were monitored by cameras and alarm systems, combinations and keys were given to staff who worked with these records, combinations were reportedly changed annually or when a staff turnover occurred, and sign in logs were initialed and dated when opening and closing vaults and safes. Five NW offices' SPRAs were stored in a secured vault room at Archives II. The secured vault room was monitored by camera and an alarm system, and a sign in log was initialed and dated when opening and closing the vault. The combination was given to staff who worked with the records and was changed semi-annually or when staff turnover occurred per established procedures. All work in the vault involved at least two staff members, one who has been given the combination. However, none of the three NR record centers' archival operations we reviewed had sufficient secured protected areas to store and restrict access to SPRAs. Materials at two archival operations were kept in open stack areas where all archival operations staff had access. The third archival operations kept materials in a shared vault where operation records staff had access.

Region (NR) did not have sufficient secured protected areas to store and restrict access to all identified SPRAs. The Director of NR elected to keep records that could not be stored in the safe in the stacks instead of the center's vault because the vault was shared with Records Center Operations (NR) staff. The Director believed he was in a better position to control access to the unsecured special records kept in the archival operations stacks.² The Regional Administrator of the Region (NR) stated there was a need for additional secured storage for NR records, but the center's budget did not have the necessary funds to purchase a safe or miniature vault that would meet its needs. As a result, the control and accountability that exist for SPRAs in a safe does not exist for those stored in the open stack areas. Thus they are more vulnerable to theft, loss, or damage from unauthorized handling.

² Examples of SPRA not kept in the safe are three .

- 1.
- 2.
- 3.

Region (NR) did not have sufficient secured protected areas to store and restrict access to its records meeting the definition of SPRAs. The Director of NR said that not all the center's SPRAs could be secured in their one locking five drawer safe. The Director of NR stated the center had no vault or cage area and there was no choice but to leave on the shelves those that did not fit in the safe. Oversize records and artifacts, like maps and drawings, were left in map cases. File boxes containing court documents that met the definition of SPRAs were left on the shelves in the archival stacks. b2



The above is a detailed copy of a staff to be the only

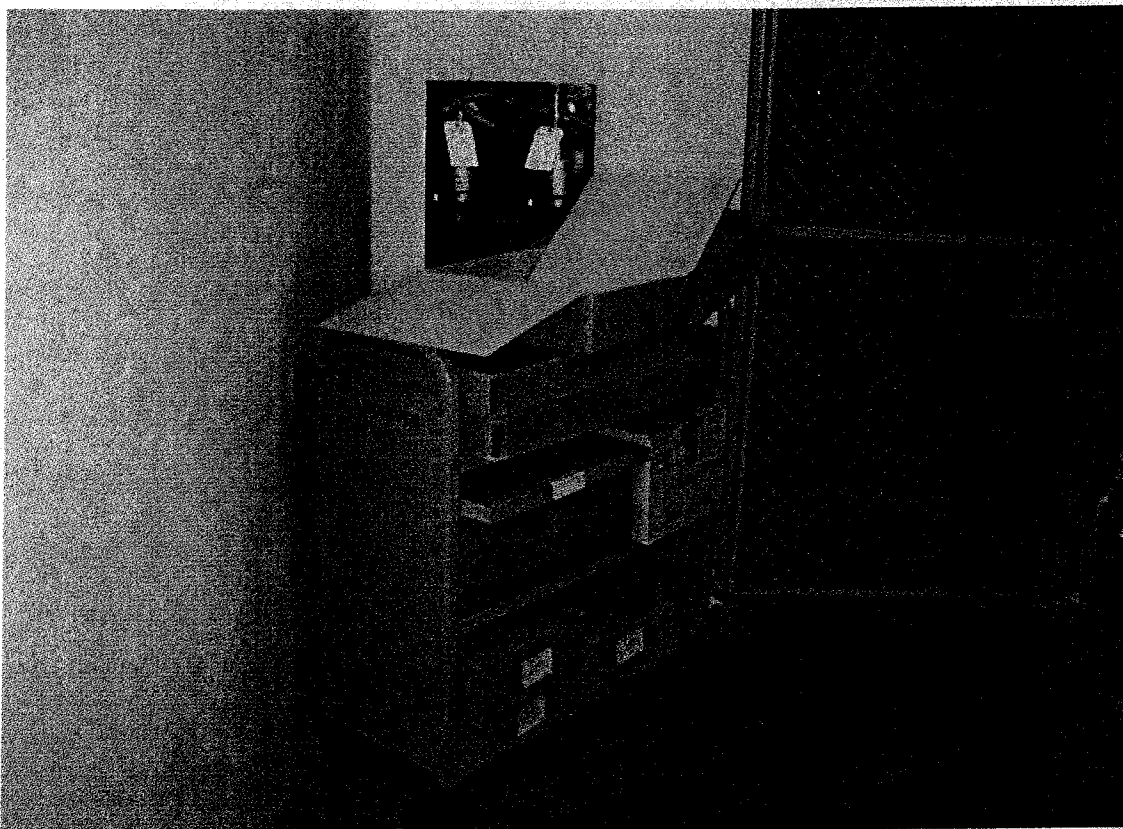
The original is believed by NARA b2

The oversize original, not photographed due to preservation concerns, could not be stored in the safe and was kept in this map case.

The Regional Administrator of Area (NR) was aware that not all SPRAs were stored in secure areas, but had not asked the Assistant for Operations, Office of Regional Records Services, for additional safes. The Regional Administrator said safes are not the answer for the current volume and size of SPRAs in the stacks. According to the Regional Administrator, a cage area would be the best solution to accommodate the volume and size of SPRAs. The Regional Administrator is working on a plan to separate the stack area from the processing area and install a cage area. b2

The Region (NR) did not have secured protected areas to store and restrict access to their SPRAs. NR did not have a safe or secure cage and stored SPRAs in a vault shared with the Records Center Operations (NR). Two NR staff members escorted the auditor to the SPRAs in the vault. b2

The vault door was open and NR staff was working in the vault. The SPRAs³ were in boxes stored on a cart by the vault door. NR staff entering the vault had easy access to these records. The Regional Administrator was aware the SPRAs were in the vault. She believed they were in compliance with NR40-040 to limit access because the staff with access to the vault had special clearances. However, this method for storing the SPRAs does not restrict access to staff that is authorized to handle the records.



NR high value documents on cart in vault room

The findings at the three regional record services were discussed with the Assistant for Operations, Office of Regional Records Services. He agreed that all SPRAs identified by NR and NR staff should be stored in secure areas and that NR records should be removed from the vault and stored in a safe.

Recommendation 3:

The Assistant Archivist for the Office of Regional Records Services (NR) should take necessary measures to have SPRAs in secure storage space in compliance with NR04-040.

³ The NR SPRAs totaling 603 documents are mostly U.S. Presidents.

signed by

Management Comments:

Management agreed with the recommendation.

Required Annual Record Inspection of SPRAs was not Performed by Three NWC Offices

Three of five NWC offices included in our review did not perform annual inspections of SPRAs stored in the secured stack room at Archives II. Staff responsible for performing the annual inspections had no internal written guidance to follow and had forgotten the annual inspections were required. Archives 1400, Chapter 8, Security Procedures, require offices to perform systematic annual inspections of their SPRAs. As a result of not performing the inspections, loss or damage to SPRAs may go undetected.

The auditor reviewed the annual inventories and inspections reports of SPRAs at three Presidential libraries, three regional records centers, and five NWC offices. The Presidential libraries and regional records centers were performing annual inventories of SPRAs. However, three of five NWC offices were not performing annual inspections.

Five NWC offices were storing SPRAs in the secured stack room at Archives II. Our review of annual inspection reports on March 31, 2005, identified the following three inspection reports as greater than one year old:

- Access Programs, (NW.), January 14, 2004;
- Access Programs, (NW.) October 30, 2003; and
- Access Programs, (NW.), September 12, 2003.

We interviewed staff responsible for performing the annual inspections for the three offices and asked why the annual inspections were not performed. Their responses were as follows:

- NW responded they had higher priority work and were late in performing the inspection and getting the report out.
- NW responded they cannot find a report for 2004 and they have not performed an inspection this year (2005). stated, "In the past we always got annual reminders, usually in September, but haven't recently."
- NW responded they have no record of an inventory being performed in 2004. The person that had prepared the prior inspection report in 2003 had retired and that may explain why the annual inspection was not performed.

The staff for the three offices stated they were unfamiliar with Archives 1400, Chapter 8 requirement for annual inspections SPRAs. The Director of NWC was informed that three offices had not performed annual inspections and agreed that they should have been performed.

Recommendation 4:

The Assistant Archivist for Records Services – Washington DC (NW) should (a) issue guidance for performing annual inspections of SPRAs, and (b) assign responsibility for ensuring that the inspection is performed.

Management Comments:

Management concurred with the recommendation.

Two Person Inventory Rule not Adhered to at NL

The _____ Library (NL) annual inventory of SPRAs was not completely performed by a two-member team. Staff was not following established internal control procedures of Presidential Libraries Manual, Libraries 1401. Presidential Libraries Manual, Libraries 1401, requires inventories of items vulnerable to theft to be performed by at least one staff member other than the person preparing the inventory. NL is in noncompliance with Presidential Libraries Manual, Libraries 1401.

The auditor reviewed the procedures for performing annual inventories and inspections of SPRAs at three Presidential libraries, three regional records centers, and five NWC offices. Our reviews found that two Presidential libraries, three Regional Records Centers, and five NWC offices were performing annual inventories and inspections using two member teams. However NL's annual inventory was not entirely performed by two staff members.

NL staff was asked if the annual inventory of SPRAs was performed by two staff members. The assistant to the library director and museum registrar replied that approximately 70 percent was performed by two staff members and 30 percent was performed by one staff member. The assistant to the library director stated that one person was pulled off the team to work on other projects. As a result Libraries 1401 internal control procedures were not followed and the accuracy of the entire inventory was not verified by two staff members.

Recommendation 5:

The Assistant Archivist for Presidential Libraries (NL) should ensure the annual inventories are performed by two staff members.

Management Comments:

Management concurred with the recommendation and initiated corrective action.

NARA OFFICE	All archival holdings not reviewed for high value records	Complete list of high value items not maintained	Access to high value records not restricted	Annual inspections not performed	Inventory not performed by a team of two
1. NW	X			X	
2. NW	X			X	
3. NW	X			X	
4. NW	X				
5. NW	X				
6. NR	X	X	X		
7. NR	X	X	X		
8. NR	X		X		
9. NL	X				X
10. NL					
11. NL					

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- 1. NW - Access Programs, at College Park, Maryland
- 2. NW - Access Programs at College Park
- 3. NW Access Program at College Park,
- 4. NW Access Programs at College Park,
- 5. NW, Washington, DC,
- 6. NR Region
- 7. NR Region
- 8. NR
- 9. NL Presidential Library
- 10. NL
- 11. NL Presidential Library

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National Archives and Records Administration

8601 Adelphi Road
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Date: October 6, 2006
To: OIG
From: NA, NL, NR, NW, and NPOL
Subject: Comments on OIG Draft Report 06-08, Controls Over Specially Protected Records

Thank you for the opportunity to review and comment on the recommendations in the above named draft report. The comments that follow are contributed by NL, NR, NW, and NPOL staff. Each office has concurred on the content of these responses. NA staff had no specific comments on the recommendations.

Finding 1 Not all Archival records have been reviewed for SPRAs.

Recommendation 1

The Assistant Archivists for NR, NL, and NW should review and revise, where necessary, the current procedures for reviewing all archival record holdings.

Concur. During the course of this audit, we issued NARA Directive #1572, Security for NARA Holdings that cancels Archives 1400, Chapter 8, part 4, Security Procedures. We believe that this new directive addresses the concerns raised in this audit.

Finding 2 List of SPRAs not maintained

Recommendation 2

The Assistant Archivist for NR should ensure that regional records operations maintain a complete listing of all SPRAs including those that are not removed from the stack shelves.

Concur. The Assistant Archivist for NR concurs with this recommendation with the understanding that a complete list must include all identified SPRAs are stored in cages, vaults, safes, and other areas within regional archives.

Finding 3 Access to SPRAs was not restricted

Recommendation 3

The Assistant Archivist for NR should take necessary measures to have SPRAs in secure storage space in compliance with NR04-040.

Concur. NR04-040, Increase Security Storage for Records of High Value, requires SPRAs to be maintained in special stack areas, vaults, or safes. The Assistant Archivist for NR concurs with this recommendation, but notes that use of a classified security vault (as done at NRABA) is acceptable practice and will be continued. NR will review the precautions in place in the classified vaults to ensure that these are sufficient.

Finding 4 Annual inspection procedures for large record series were inadequate

Finding 4 Required annual record inspections of SPRAs were not performed by three NW offices

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Recommendation 4

The Assistant Archivist for NW should (a) issue guidance for performing annual inspections of SPRAs, and (b) assign responsibility for ensuring that the inspection is performed.

Concur. The Assistant Archivist for NW concurs with the intent of this recommendation, but notes that NW has had written guidance to ensure performance of annual SPRA inspections in place for several years. NW will consider other mechanisms to ensure that this guidance is enforced.

Finding 5 Two person inventory rule not adhered to at NL

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Recommendation 5

The Assistant Archivist for NL should ensure the annual inventories are performed by two staff members.

Concur. The Assistant Archivist for NL concurs with the recommendation and notes that NL identified this need during a program audit at NL this fiscal year. Corrective action is underway and will be reported to NL.

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cc: Allen Weinstein, N
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