NATIONAL
ARCHIVES

OFFICE *of*
INSPECTOR GENERAL

Date : July 29, 2013

Reply to : Office of Inspector General (OIG)

Subject : Management Letter 13-13, The Management Control Environment over Archival Operations at the National Archives at San Bruno, CA Needs to be Urgently Addressed

To : David S. Ferriero, Archivist of the United States (N)

The purpose of this management letter is to bring to your attention serious management control weaknesses we observed during a limited visit, which put NARA records at risk of loss. Specifically, Archival operations at the National Archives at San Bruno, CA (RW-SB) are in dire straits. While researchers are consistently provided extensive personal service; the accessioning, processing and maintenance of records runs "on desperation and panic." The facility lacks policies and procedures for basic operations, and lacks the organizational structure needed to sustain operations. Currently RW-SB operations are primarily dependent on the personal experience and knowledge of select staff. There are no continuity plans and should these employees be unavailable for work it would severely impact RW-SB's ability to locate and serve records. In our opinion, due to the issues discussed below RW-SB does not have appropriate physical or intellectual control over NARA's holdings.

Staff interactions with management

During this review we observed a limited amount of staff interaction with management. While this was not intended to be a focus point for our review, we believe there may be serious issues meriting further senior management review. For example, we observed a staff member acting openly defiant to management direction and engaging in confrontational behavior with management. We were also informed management has tried to implement some new directives and changes to work processes. However, we have been told staff openly disregard these directions when management is not around to observe and enforce them.

No process for refiling records

RW-SB has no defined process for refiling NARA accessioned records which have been pulled off of the shelves. Further, there are no written policies or procedures on refiles. Multiple carts and shelf locations throughout the stacks and other work areas contain NARA accessioned records awaiting refiling. A recent safety inspection noted 43 loaded carts/streamliners parked in the stack areas alone. Despite a reported clean-up after the inspection, many loaded carts remain.

Refiles include records which have been served to researchers, and records which are part of various staff "projects." There are no standards for how long refiles can stay off of the shelves, and some of these records have been located on carts for years. There is little or no documentation accompanying many of the "project" records, and the only information on these records is the personal knowledge of select employees. Several of the researcher-served refile records on carts did not have accompanying pull slips. Some of the records which were accompanied by pull slips had unexplained irregularities with the slips, such as listing more containers than were on the cart or describing records which were not on the cart. As was noted in the recent safety inspection, "it was explained that the documents on the carts are to be re-filed but do not know what they are, who pulled them or where they belong as there is no action location aide to assist in re-file. Only the person who pulled the document/asset knows where it needs to be re-filed and is reluctant to do so."

We attempted to perform one "reverse refile" where we examined a pull slip on the shelf and then attempted to find the record. The pull slip was over three months old, and was for two items furnished from two separate boxes to a researcher. No system or file contained information about the records' locations. Staff searched several carts in the stacks near the research room, a processing area, and a staff office, but the records could not be found. We were informed the only way to potentially find the records would be a manual search through all carts and staff areas.

HMS data is inaccurate, and HMS is not used effectively

RW-SB is not utilizing NARA's Holding Management System (HMS) effectively, and cannot rely on the limited data in HMS concerning holdings at RW-SB. HMS is an agency-wide computerized system supporting the physical management of NARA holdings. One function of HMS is detailing exact locations of accessioned records in stack areas. However, RW-SB's HMS records locations are not consistently reliable. We sampled 16 records series from HMS, and generally found the records at the location indicated. However, it was explained this occurred primarily because the sample was comprised mainly of smaller records series. RW-SB's data for larger series is flawed, due to a discrepancy between the number of boxes HMS allows on each shelf versus the number which can actually fit. When HMS was initially populated with RW-SB's legacy system data, this discrepancy resulted in HMS recording arbitrary locations for boxes. For larger series of records, this arbitrary assignment of location compounded over multiple shelves resulting in the actual locations of specific boxes being entirely incorrect.

Further, a preliminary review of HMS data indicates there may be a more a serious problem. The stack areas in the archival operations appear to be almost at capacity. In fact, space limitations have forced RW-SB to "accession in place" over 24,000 cubic feet of records at the co-located Federal Records Center (FRC). However, HMS shows approximately 36% of RW-SB's archival shelf space, capable of holding over 20,800 cubic feet, is currently available. Particularly disturbing is the map room area, a sizable room which is visibly filled with records. Yet, according to HMS, it only contains approximately seven cubic feet of records. One series

containing 28 tubes of records was selected from the map room, and no information about these records could be found in HMS. However, they were found in local finding aids. Thus it appears RW-SB may have substantial amounts of NARA accessioned records in storage, but completely unaccounted for in HMS.

Additionally, HMS is not consistently updated to reflect the status of the holdings. For example, for two records series we observed incorrect numbers of containers in HMS. In both instances HMS had fewer containers listed than those on the shelves, apparently due to an increase in containers after staff performed holdings maintenance. In a third instance HMS stated a series was in two containers. However, when staff processed the materials to serve, they removed restricted materials and placed them in a third, unmarked box on the shelf which was not entered into HMS. Further, according to HMS, RW-SB currently holds 156 cubic feet of classified records, 450 cubic feet of records declassified in part, and over 27,000 cubic feet of records with an unknown classification status. Some staff stated the most accurate system was their locally produced inventories, which they stated were being kept up to date. Some staff also expressed the process to update HMS is not user friendly. Instead of updating HMS concurrently with changes on the shelves for larger groups of records, they preferred to create a new, separate database of changes to be migrated into HMS at a later date. Based upon all of the issues identified above, the validity of RW-SB's data in HMS is questionable in its entirety, and it is unknown whether RW-SB has any objectively reliable way to account for their inventory of records.

Box labeling is insufficient

Due to these known HMS location issues, RW-SB does not utilize HMS generated labels for marking boxes. Currently no containers are barcoded for HMS use. In fact, a vast amount of archival boxes at RW-SB have no labels at all. Instead, some identifying information is written on the boxes in pencil. In one area, the information was written on sticky notes and affixed to the boxes. One of these sticky notes was observed laying on the ground of the stack area. However, some boxes have no information on the outside. Others were labeled with information which would not appropriately identify the box, such as being labeled simply "Box 2" with no other writing. Some of the boxes accessioned-in-place at the co-located FRC had labels marking them as permanent records, others did not.

Holdings maintenance is not adequate

Staff conceded holdings maintenance is not being properly done. A walk through of the stack areas revealed large numbers of archival boxes with the front ripped off or damaged. Staff indicated ladders often catch on the counter-earthquake brackets at the bottoms of the shelves and turn into the shelf, causing the ladder to damage the boxes. Also, many books are stored on shelves standing on end, often leaning on other books or the shelving at a considerable angle. Large amounts of oversized records, i.e. maps, are rolled up and placed together in plastic bags. These groups have squished together so the rolls are no longer round.

Further, two to three thousand square feet of new materials are accessioned-in-place each year in the co-located FRC. No holdings maintenance is performed on these records. The FRC space is not climate controlled, and in some observed examples, records had been accessioned-in-place without any holdings maintenance for over thirty years. Staff further commented no preservation or description work was being done for new accessions, and only the initial accessioning paperwork was completed to accession them in place.

Staff focus on reference and inaccurate reference data

Staff indicated they spend the majority of their time performing reference activities, which limited the amount of effort available for processing activities. Colloquially we were told staff spend about 80% of their time doing reference activities, except for one staff member who was 100% devoted to processing activities. However, a review of position descriptions does not indicate such a large percentage of workload should be dedicated to reference activities. Further, it is unknown if the reference workload justifies the large amount of staff time used, because the database logging reference requests is inaccurate. All correspondence to the facility, such as grant proposals, requests for tours, etc. were being logged into the system as reference requests. Further, researchers were advised to break single reference requests into multiple requests. For example, if a researcher were to send an email requesting immigration file information on a single person who might have had ten aliases, the standing practice would have been to ask the researcher to resend a request for each alias so it could be logged ten times. We were informed, despite recent direction to do otherwise, staff continue to follow these types of practices.

Overcrowded storage room

On the lower floor there is a very large storage room. Recently it tested positive for elevated radon levels, and consequently venting was installed. If levels remain elevated when it is scheduled for retesting, the room will have to be emptied for a more thorough remediation measure. However, there appears no physical place RW-SB could move the massive amounts of materials to within the facility. There are hundreds of large boxes, equipment, storage lockers, old exhibits, and other random supplies. Further, there were multiple boxes of material which resembled records. These materials may be non-record exhibit material or "probable non-record duplications." An original 1906 newspaper announcing "Earthquake and Fire: San Francisco in Ruins" and other original materials are located in the storage room as well.

Records are at risk of loss

Due to the conditions observed, RW-SB does not appear to have appropriate physical and intellectual control over NARA's records. Accordingly, the current situation at RW-SB puts NARA records at risk of loss. This risk is compounded by other issues including [redacted] a research room cluttered with non-record material, lack of exit screening, and several others.

Despite the issues identified, we make no claim RW-SB staff cannot locate records for research requests. Research requests are regularly filled. However, RW-SB staff are overly reliant on local finding aids, legacy systems, and the undocumented personal knowledge of certain staff. We were on-site for a limited time, and performed a very limited review. This management letter is not meant to convey all issues observed at RW-SB. However, we believe these represent serious issues which demand the immediate attention of senior staff. Please provide a written response to these matters within 30 days of the date of this letter. After sufficient management attention is given to this area, we plan to audit various aspects of operations at RW-SB in the future.

If you have any questions or require additional information, please contact me at 301-837-3000. As with all OIG products, we will determine what information is publicly posted on our website from this management letter. Should you or management have any redaction suggestions based on FOIA exemptions, please submit them to my counsel within one week from the date of this letter. Should we receive no response within this time frame, we will interpret that as confirmation NARA does not desire any redactions to the posted report.

James Springs
Acting Inspector General

cc: Jay Bosanko, Chief Operating Officer (COO)
William Mayer, Executive for Research Services (R)