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September 2013

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

Actions Needed to Ensure Facilities That Store Federal Records Meet Standards

GAO-13-668

GAO Highlights

Highlights of GAO-13-668, a report to congressional requesters

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

Actions Needed to Ensure Facilities That Store Federal Records Meet Standards

Why GAO Did This Study

NARA manages the Federal Records Centers Program, which is to ensure the storage and preservation of federal records, including paper, photographic, audio, video, and film. Records storage facilities are required to meet certain minimum structural, environmental, property, and life safety standards set forth in federal regulations.

GAO was requested to conduct a study of key aspects of the program. GAO's objectives were to (1) determine the types of facilities agencies use to store federal records and the extent to which NARA's data on agencies' use of storage facilities are complete, (2) evaluate the extent to which NARA has determined these facilities to be compliant with standards in 36 C.F.R. Part 1234, (3) determine what actions NARA has taken to minimize damage to records in federal records centers and the extent to which it documents such efforts, and (4) determine how NARA determines storage fees and whether fees differ among facilities. To do so, GAO obtained, analyzed, and corroborated documentation on records storage facilities, identified and compared records storage fees, and interviewed NARA officials.

What GAO Recommends

GAO recommends that NARA (1) obtain complete data on where agencies are storing records, (2) develop a schedule to bring noncompliant storage areas into compliance with 36 C.F.R. Part 1234, and (3) establish a requirement to document the results of efforts to minimize damage to federal records. NARA concurred with the recommendations.

View GAO-13-668. For more information, contact Valerie Melvin at (202) 512-6304 or melvinv@gao.gov.

What GAO Found

Agencies are to store federal records in three types of facilities:

- **Federal records centers**: The National Archives and Records Administration (NARA) operates 18 federal records centers that are comprised of 24 facilities (buildings) located across the United States. Each facility includes storage areas, referred to as bays.
- **Agency records centers**: Agencies also establish and operate records centers for storing their own records. As of May 2013, NARA had identified 18 agency records centers that were operated by 6 agencies or offices.
- **Commercial records storage facilities**: Agencies also use private sector commercial facilities. As of May 2013, agencies reported that 12 vendors provided 22 facilities, which were used by 11 agencies.

These facilities notwithstanding, NARA does not know where all agencies are storing records. NARA has solicited data from agencies about their use of agency records centers and commercial records storage facilities, but not all agencies have submitted data. Further, the data agencies submitted—mostly from 2008 and 2009—are now outdated. As a result, NARA cannot be assured that all agencies are using one of the three types of authorized facilities.

NARA determined that 20 of its 24 federal records center facilities were fully compliant with 36 C.F.R. Part 1234 because all of their bays satisfied the regulation; of the remaining 4, 2 facilities with inadequate shelving were partially compliant, 1 facility with insufficient protections against pipe leaks was not compliant, and the remaining facility was to be replaced. As of July 2013, NARA had plans to bring these 4 facilities into full compliance, but did not have a schedule for completing the plans at 2 of the facilities. As a result, NARA does not have a basis for determining progress toward correcting deficiencies in those facilities that do not yet fully meet the standards. Also, while NARA had approved 10 agency records centers and 22 commercial records storage facilities, it has inspected 1 of 18 agency records centers and 13 commercial records storage facilities. Until NARA completes planned inspections of all remaining facilities, it cannot be reasonably assured that agencies are storing records in facilities that meet standards.

To facilitate the protection of federal records from permanent damage, NARA had generally taken steps consistent with a checklist it requires federal records centers to follow when incidents (e.g., roof or sprinkler leaks) occur. However, it did not always document the results of its efforts to minimize damage because the checklist does not include a step for doing so. Specifically, of the 55 incidents that occurred from January 2009 through March 2013, NARA provided documentation about the final outcome for 46 incidents. For the remaining 9 incidents, it could not provide documentation that included the final results of its efforts. Without a process that includes documenting the results of its efforts, NARA is not positioned to fully report on the effectiveness of its actions to minimize damage to federal records and to provide a third party with information to validate the results of its efforts.

Storage fees are determined by NARA's Federal Records Centers Program and the Office of the Chief Financial Officer using the existing fee schedule, expense projections, and workload projections. The storage fees charged by NARA in fiscal year 2013 were comparable to fees charged by commercial vendors in that same time frame. For example, NARA's fee of $0.23 per cubic foot was higher than fees charged by two vendors and lower than fees charged by two other vendors.

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Abbreviations

CFR	Code of Federal Regulations
FTE	full-time equivalent
GSA	General Services Administration
NARA	National Archives and Records Administration

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE
441 G St. N.W.
Washington, DC 20548

September 10, 2013

The Honorable Thomas R. Carper
Chairman
The Honorable Tom Coburn, M.D.
Ranking Member
Committee on Homeland Security
and Governmental Affairs
United States Senate

The Honorable Robert P. Casey, Jr.
United States Senate

The National Archives and Records Administration (NARA) manages the Federal Records Centers Program, which is to ensure the storage and preservation of federal records, including paper, electronic, photographic, audio, video, and film. Records storage facilities are required to comply with regulations (i.e., 36 C.F.R. Part 1234) that specify certain minimum structural, environmental, property, and life safety standards that facilities must meet in order to minimize damage to the records. NARA operates records storage facilities on a reimbursable fee-for-service basis by charging fees to federal agencies for storing records in the facilities.

At your request, we conducted a study of key aspects of the Federal Records Centers Program. Our specific objectives were to (1) determine the types of facilities agencies use to store federal records and the extent to which NARA's data on agencies' use of storage facilities are complete, (2) evaluate the extent to which NARA has determined these facilities to be compliant with standards in 36 C.F.R. Part 1234, (3) determine what actions NARA has taken to minimize damage to records in federal records centers and the extent to which it documents such efforts, and (4) determine how NARA determines storage fees and whether fees differ among facilities.

To accomplish the objectives, we obtained and reviewed documentation identifying facilities that federal agencies use to store records. We then corroborated the lists of facilities through analysis of other documentation, such as compliance memoranda and inspection schedules, and through interviews with NARA officials. In addition, we obtained and reviewed documentation, such as NARA's central registry of approved facilities that discussed the characteristics of each identified records storage facility. We analyzed information describing NARA's assessment of each facility

in comparison to applicable standards in 36 C.F.R. Part 1234. These information sources included compliance checklist documentation and official NARA documentation supporting approval of the facility. We also interviewed NARA officials regarding certification documentation. Further, we interviewed NARA officials to identify what actions NARA has taken to minimize damage to records in federal records centers and corroborated the officials' statements with available documentation pertaining to records storage and management. We also interviewed officials from companies that operate commercial records storage facilities that NARA has approved for use by federal agencies to gain their perspectives on storing records for federal agencies. Finally, we obtained and analyzed documentation from the NARA Federal Records Centers Program and General Services Administration (GSA) schedules[1] that identified and discussed records storage fees. We then compared fees among the records storage facilities.

We conducted this performance audit from November 2012 to September 2013 in accordance with generally accepted government auditing standards. 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. Appendix I provides further details on our objectives, scope, and methodology.

Background

NARA's mission is to safeguard and preserve the records of the U.S. government, ensuring that the people can discover, use, and learn from this documentary heritage. In this way, NARA is to ensure continuing access to the essential documentation of the rights of American citizens and the actions of their government.

In carrying out this mission, NARA (among other things) is to provide guidance and assistance to federal officials on the management of records; determine the retention and disposition of records; store agency records in federal records centers from which agencies can retrieve them; receive, preserve, and make available permanently valuable federal and

[1]Under the GSA schedules program, GSA establishes long-term, governmentwide contracts for commercially available goods and services, under which federal agencies can issue orders.

presidential records in archives; and centrally file and publish federal laws and administrative regulations, the President's official orders, and the structure, functions, and activities of federal agencies through the daily *Federal Register*. Table 1 summarizes NARA's organizations, their missions, and the levels of staff in each (expressed as full-time equivalent—FTE).

Table 1: Major NARA Offices, Missions, and Staffing

Organization	Mission	FTE[a]
Office of the Archivist, staff offices, and independent offices	Plans, develops, administers, and oversees NARA programs and functions.	220
Office of Chief Operating Officer	Provides operational leadership across six program offices: (1) Office of the Federal Register, (2) Agency Services, (3) Research Services, (4) Legislative Archives, Presidential Libraries, and Museum Services, (5) Information Services, and (6) Business Support Services to ensure agencywide support and accountability to NARA's internal customers.	15
Agency Services	Leads NARA's efforts to service the records management needs of federal agencies and provides coordination between records management and the Federal Records Centers Program.	1,359
Office of the Federal Register	Informs citizens of their rights and obligations by providing ready access to the official text of federal laws, presidential documents, administrative regulations and notices, and descriptions of federal organizations, programs, and activities.	56
Research Services	Provides services to customers who access NARA's accessioned federal records and manages archival and preservation-related functions.	592
Legislative Archives, Presidential Libraries, and Museum Services	Leads NARA's national education and exhibit programs and administers the Center for Legislative Archives and the Presidential Libraries system.	497
Information Services	Leads NARA's information technology projects and programs and develops information systems and tools to help customers locate NARA's record holdings.	104
Business Support Services	Provides customer service to NARA units and is led by an executive reporting to the Chief Operating Officer.	180
Total		**3,023**

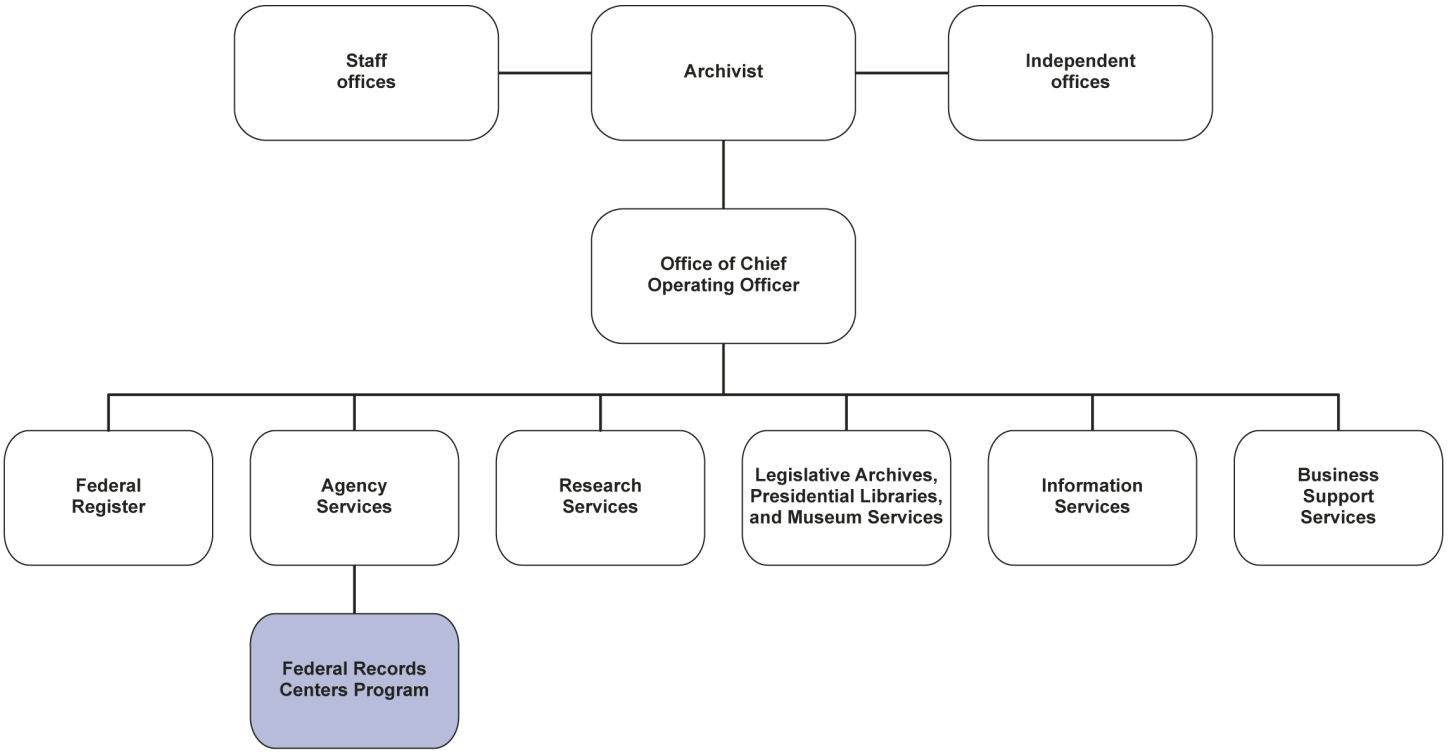
Source: GAO analysis of information provided by NARA.

[a]NARA staffing levels as of April 2013.

NARA's Agency Services group includes the Federal Records Centers Program, with approximately 1,100 FTE. The placement of this program within the larger NARA organization is depicted in figure 1.[2]

[2]Organizationally, NARA's responsibilities under 36 C.F.R. Part 1234 are handled by two different offices, Agency Services (where management of both the Federal Records Centers and Records Management programs reside) and Business Support Services (where the responsibility for inspection and facility approvals are managed).

Figure 1: Simplified Depiction of NARA Organization Showing Placement of the Federal Records Centers Program



Source: GAO analysis of information provided by NARA.

In carrying out its responsibilities to store and archive federal records under the Federal Records Act and its implementing regulations, the Federal Records Centers Program provides storage facilities for federal agencies. Specifically, chapters 21, 29, and 31 of title 44 of the United States Code,[3] and Parts 1232 and 1234 of title 36 of the Code of Federal Regulations authorize NARA to establish, maintain, and operate records centers for federal agencies. Further, 36 C.F.R. Part 1234 Subparts B, C, and D describe facility standards related to quality, effectiveness, durability, and safety; the handling of deviations from NARA's facility standards; and facility approval and inspection requirements. These standards are applicable to all records storage facilities that federal agencies use to store, service, and dispose of records. To carry out these responsibilities, NARA developed an internal policy directive that outlines

[3]44 U.S.C. §§ 2104(a), 2904, 2907, 3102 and 3103.

the procedures its officials should use to ensure the compliance of records storage facilities.[4]

36 C.F.R. Part 1234 also includes provisions allowing NARA to grant waivers from meeting the standards set forth in the regulations for records storage facilities. In these instances, waivers are allowed when the storage systems, methods, or devices are demonstrated to have facility standards that are equivalent or superior to 36 C.F.R. Part 1234 standards for quality, strength, fire resistance, effectiveness, durability, and safety, among other things. Underground facilities may obtain waivers from regulatory requirements that pertain to the roofs of aboveground facilities. Agencies can request a waiver by providing:

- a statement identifying the 36 C.F.R. Part 1234 provision for which the waiver is requested, in addition to a description of the proposed alternative, and an explanation of how it is equivalent or superior to the NARA requirement; and

- supporting documentation demonstrating that the alternative does not provide less protection for federal records than what is required by the 36 C.F.R. Part 1234 standard, which may include certifications from a licensed fire protection engineer or a structural or civil engineer, as appropriate; reports of independent testing; reports of computer modeling; and/or other relevant information.

According to 36 C.F.R. Part 1234, NARA is to review the waiver request and supporting documentation, and in some circumstances, consult with the appropriate industry body or qualified experts, such as a fire-suppression specialist, before making a determination. If NARA is in agreement with the proposed waiver and the supporting documentation, it is to grant the waiver and notify the requesting agency. However, if NARA evaluates the waiver request and the supporting documentation unfavorably, it is not to approve the waiver.

The Federal Records Centers Program is financed through a revolving fund, which in fiscal year 2012 earned revenue totaling approximately $185 million. Revenues for the fund are generated from the fees that NARA charges federal agencies for storing, servicing, and ultimately

[4]NARA, *Review of Records Storage Facilities,* NARA 1310 Policy Directive (May 22, 2008).

disposing of temporary federal records on their behalf, based on a standard fee schedule. NARA develops the fees annually for the upcoming fiscal year.

In November 2011, a presidential memorandum on managing government records was issued to the heads of executive departments and agencies. The purpose of the memorandum was to begin an executive branch-wide effort to reform records management policies and practices and to develop a 21st-century framework for the management of government records. Specifically, the memorandum stated, among other things, that all agencies were required to designate a Senior Agency Official to oversee a review of their records management program. The Senior Agency Official would be responsible for coordinating with the Agency Records Officer and appropriate agency officials to ensure the agency's compliance with records management statues and regulations.

NARA's Inspector General Previously Reported on Federal Records Centers Challenges

In January 2012 and March 2012, NARA's Inspector General reported on one of NARA's federal records centers, the Washington National Records Center, and found that it had numerous weaknesses.[5] For example, the Inspector General reported that formalized procedures were not in place to properly track and resolve problems with records received, stored, or removed from the center; documented procedures did not exist for many of the center's operations; and periodic inventories of the records held at the center were not conducted. In order to address the weaknesses cited above, the Inspector General made recommendations, which included developing a problem resolution process and mechanism for tracking all problems at the center until they are resolved, ensuring a formal tracking mechanism is implemented for new records received, and ensuring a systematic and repeatable process is in place to perform periodic inventories of the records held at the Washington National Records Center.

[5]NARA Inspector General, *Audit of the Management of Records at the Washington National Records Center;* OIG Audit Report No. 12-02, Report 1 of 2 (Washington, D.C.: Jan. 3, 2012); and *Audit of the Management of Records at the Washington National Records Center;* OIG Audit Report No. 12-05 Report 2 of 2 (Washington, D.C.: Mar. 27, 2012).

NARA concurred with these recommendations and began taking actions to address them. Specifically, the Archivist ordered all federal records centers operated by NARA to assess their operations during a 1-day stand down. In addition, NARA officials stated that they established a Washington National Records Center oversight group to ensure that the center leadership participated in plans, actions, and results related to resolving record storage issues. However, as of May 2013, NARA was in the process of addressing the recommendations.

Federal Records Are to Be Stored in Three Types of Facilities; NARA Does Not Have Reliable Data about All Agencies' Use of Records Storage Facilities

Federal agencies are to store records in three types of facilities: federal records centers that are managed by NARA, agency records centers, and commercial records storage facilities. Each of these types of facilities is authorized by 36 C.F.R. Part 1234, which also requires agencies to notify NARA when they use agency records centers or commercial facilities to store federal records. While NARA is aware of the extent to which agencies use the federal records centers that it manages, its awareness of the extent to which agencies' use their own and commercial records storage facilities is incomplete.

NARA Federal Records Centers

As of May 2013, NARA manages 18 federal records centers located across the United States. These centers consist of a total of 24 facilities where records are actually stored. Each facility includes storage areas, which NARA refers to as bays. (According to NARA, the typical bay is approximately the size of a football field.) Collectively, the facilities provide a total of 162 bays that are used by approximately 200 entities. Table 2 provides a listing of NARA's federal records centers and their related facilities, and the number of bays at each facility.

Table 2: NARA-Operated Federal Records Centers, Related Facilities, and Number of Bays, as of May 2013

	Federal records centers	Facility	City, State	Number of bays
(1)	Pittsfield	(1) Pittsfield	Pittsfield, Massachusetts	3
(2)	Boston	(2) Boston - Waltham	Waltham, Massachusetts	4
(3)	Philadelphia	(3) Philadelphia - Townsend Road	Philadelphia, Pennsylvania	7
(4)	Atlanta	(4) Atlanta- Ellenwood	Ellenwood, Georgia	7
(5)	Chicago	(5) Chicago	Chicago, Illinois	4
		(6) Great Lakes Palletized Facility	North Chicago, Illinois	3

	Federal records centers	Facility	City, State	Number of bays
(6)	Dayton	(7) Dayton Building 2	Dayton, Ohio	4
		(8) Dayton Building 3	Dayton, Ohio	5
		(9) Dayton Building 4	Dayton, Ohio	5
		(10) Dayton Palletized Facility	Fairfield, Ohio	4
(7)	Kingsridge	(11) Kingsridge	Dayton, Ohio	5
(8)	Lenexa	(12) Lenexa	Lenexa, Kansas	16
(9)	Lee's Summit	(13) Lee's Summit	Lee's Summit, Missouri	17
(10)	Kansas City	(14) Kansas City - Subtropolis	Kansas City, Missouri	1
(11)	Ft. Worth	(15) Ft. Worth - Building 9	Ft. Worth, Texas	2
		(16) Ft. Worth - John Burgess	Ft. Worth, Texas	5
(12)	Denver	(17) Denver - Broomfield	Broomfield, Colorado	4
(13)	Riverside	(18) Riverside	Perris, California	4
(14)	San Francisco	(19) San Francisco	San Bruno, California	7
(15)	Seattle	(20) Seattle	Seattle, Washington	8
		(21) Anchorage	Anchorage, Alaska	1
(16)	St. Louis[a]	(22) National Personnel Records Center - Archives Drive	St. Louis, Missouri	15
(17)	St. Louis[b]	(23) National Personnel Records Center Annex - Valmeyer	Valmeyer, Illinois	11
(18)	Suitland	(24) Washington National Records Center	Suitland, Maryland	20

Source: GAO analysis of information provided by NARA.

[a]Military Personnel Records Center

[b]Civilian Personnel Records Center

Agency Records Centers

In addition to the federal records centers that NARA operates, agencies also are authorized to establish and operate their own centers for storing records. As of May 2013, NARA had identified 18 records centers that were being operated by six federal agencies or offices: the Department of Energy, the Department of Veterans Affairs, the Federal Bureau of Investigation, the National Geospatial-Intelligence Agency, the National Reconnaissance Office, and the Transportation Security Administration's Office of Law Enforcement – Federal Marshal Records Center. These agencies varied in the number of storage facilities that they operated—ranging from 7 at the Federal Bureau of Investigation to 1 facility at each of three other agencies (the Department of Veterans Affairs, the National Reconnaissance Office, and the Transportation Security Administration's Office of Law Enforcement). Table 3 identifies the number of records storage facilities operated by each of the agencies.

Table 3: Federal Agencies that Operate Records Storage Facilities, as of May 2013

Agency	Number of facilities
Department of Energy	6
Department of Veterans Affairs	1
Federal Bureau of Investigation	7
National Geospatial-Intelligence Agency	2
National Reconnaissance Office	1
Transportation Security Administration's Office of Law Enforcement – Federal Marshal Records Center	1
Total	**18**

Source: GAO analysis of information provided by NARA.

Commercial Storage Facilities

Federal agencies are also authorized to use private sector commercial facilities for records storage, retrieval, and disposition. As of May 2013, agencies reported to NARA that 22 such facilities, operated by 12 vendors, are under contract with and provide storage services for 11 federal agencies or entities. These federal agencies or offices are the Bureau of Public Debt, Centers for Medicare and Medicaid Services, Commodities Futures Trading Commission, Department of Veterans Affairs, Environmental Protection Agency, Federal Aviation Administration, Federal Energy Regulatory Commission, Federal Public Defender, Naval Sea Systems Command, United States Customs and Border Protection, and the United States International Trade Commission. Table 4 identifies each vendor and their facilities that provide records storage services to federal agencies.

Table 4: Federal Entities Use of Commercial Records Storage Facilities, as of May 2013

Vendor	Number of vendor facilities	Federal entity using commercial facility
Archive Corporation	1	• Department of Veterans Affairs
Armor Industries	1	• Department of Veterans Affairs
Augusta Data Storage	1	• Centers for Medicare and Medicaid Services
DataSavers	1	• Centers for Medicare and Medicaid Services
Diversified Information Technologies, Inc.	7	• Centers for Medicare and Medicaid Services • Department of Veterans Affairs • United States International Trade Commission • Environmental Protection Agency • United States Customs and Border Protection
InfoResources Incorporated	1	• Department of Veterans Affairs
Iron Mountain	5	• Centers for Medicare and Medicaid Services • Department of Veterans Affairs • Environmental Protection Agency • Commodity Futures Trading Commission • Federal Energy Regulatory Commission • Federal Public Defender • Naval Sea Systems Command
Professional Data Storage and Delivery, Incorporated	1	• Department of Veterans Affairs
Records Imaging and Storage	1	• Bureau of the Public Debt
Riverbend Government Benefits Records Center	1	• Centers for Medicare and Medicaid Services
Safesite	1	• Department of Veterans Affairs • Federal Aviation Administration
Sourcecorp Deliverex	1	• Department of Veterans Affairs

Source: GAO analysis of information provided by NARA.

To determine whether all agencies were storing their records in one of the three types of allowable facilities, NARA collected data and compiled a database of agencies and the records storage facilities that they use. Specifically, in 2008, NARA officials sent letters to agencies' records managers that asked them to provide a list of all records storage facilities used. Subsequently, NARA sought to obtain information about where agencies were storing their records by sending follow-up letters and by including a question regarding the storage of federal records in a voluntary annual survey of agencies' records management practices. However, the database was unreliable because it did not include complete, current, and valid data. Specifically, NARA's database of agencies' records storage facilities included a reporting status for about 260 agencies, but did not have a date associated for when 47 of these agencies reported. Additionally, the data were derived primarily from information agencies submitted to NARA in 2008 and 2009, thereby rendering it outdated. Also, the self-reported nature of agencies' data raised questions about the validity of the data they provided.

NARA officials responsible for determining where agencies store records acknowledged that the data about agencies' and the records storage facilities they use are incomplete, outdated, and of questionable validity. The officials attributed this situation to agencies' not reporting data to NARA because they were unfamiliar with the 36 C.F.R. Part 1234 requirement to notify NARA when they use agency records centers or commercial facilities to store federal records, as well as NARA having insufficient staff to ensure that all agencies report the required data, keep the data current, and verify the data agencies provide.

NARA officials responsible for communicating records storage requirements to agencies stated that the Senior Agency Officials for records could provide NARA with points of contact that can help identify all the facilities where agencies store their records.[6] Nevertheless, until NARA ensures that it has complete, current, and valid data on agencies' records storage facilities, it cannot be certain that agencies are using one of the three types of authorized facilities.

[6]We did not confirm whether agencies have designated these Senior Agency Officials for records.

NARA Has Approved Almost All of Its Federal Records Centers as Compliant with Applicable Standards, but It Has Not Inspected and Validated the Majority of Agency and Commercial Records Facilities

In carrying out its responsibilities to store and archive federal records, Title 44 of the United States Code[7] authorizes NARA to establish, maintain, and operate records centers for federal agencies; approve agency records centers; and promulgate standards, procedures, and guidelines to federal agencies with respect to the storage of their records in commercial records storage facilities. Regulations implementing the statute, at 36 C.F.R. Part 1234, specify the minimum structural, environmental, property, and life-safety standards that a records storage facility must meet when the facility is used for the storage of federal records. For example, facilities must be designed in accordance with the applicable national, regional, state, or local building codes to provide protection from building collapse or failure of essential equipment. Further, a floor load limit must be established for the records storage area by a licensed structural engineer, and the facility must be 5 feet above and 100 feet from any 100-year flood plain areas, or be protected by an appropriate flood wall that conforms to local or regional building codes. In addition, NARA's Review of Records Storage Facilities policy directive outlines the procedures for NARA to ensure records centers comply with 36 C.F.R. Part 1234 specifications. Specifically, the directive requires NARA to conduct inspections of its federal records centers and agencies' records centers to validate those facilities as compliant. In addition, 36 C.F.R. Part 1234 requires that agencies ensure that their own or NARA officials have the right to inspect commercial records storage facilities for compliance with the facility requirements. If a commercial facility fails an inspection, federal agencies that store records at the facility are required to bring the facility into compliance with the standards within 6 months or to transfer their documents to a compliant facility within 18 months. Standard practices in program management call for documenting the scope of a project as well as milestones and time frames for timely completion and implementation of repairs or transfers to ensure results are achieved.[8]

NARA conducted inspections of 23 of its 24 federal records center facilities from February 2005 through January 2013 and determined that 20 of the facilities were compliant with 36 C.F.R. Part 1234. It also determined that 2 facilities were partially compliant because they included

[7]44 U.S.C. §§ 2104(a), 2904, 2907, 3102, and 3103.

[8]The Project Management Institute, *The Standard for Program Management* © (Newtown Square, Pa., 2006).

at least 1 storage bay that did not satisfy the regulation. Specifically, NARA found that 2 of the 16 bays at the Lenexa, Kansas facility and 6 of the 17 bays at the Lee's Summit, Missouri facility were noncompliant because they included shelves that were determined to be too weak to meet the load requirements for records storage shelving and racking systems. Further, it found that all 7 bays at the San Francisco, California records center were noncompliant because, contrary to the regulation, there were pipes (other than sprinkler pipes) that ran through the records storage areas which lacked supplemental protective measures such as drip pans.[9] The remaining facility consisting of 1 bay at the Anchorage, Alaska center was not inspected; however, NARA had considered the facility to be noncompliant and had planned to relocate the records being stored there. Table 5 summarizes the compliance status of each federal records center facility.

Table 5: Status of Compliance of Each Federal Records Center Facility, as of January 2013

Facility	Number of noncompliant bays	Compliance
(1) Pittsfield	0 of 3	●
(2) Boston - Waltham	0 of 4	●
(3) Philadelphia - Townsend Road	0 of 7	●
(4) Atlanta- Ellenwood	0 of 7	●
(5) Chicago	0 of 4	●
(6) Great Lakes Palletized Facility	0 of 3	●
(7) Dayton Building 2	0 of 4	●
(8) Dayton Building 3	0 of 5	●
(9) Dayton Building 4	0 of 5	●
(10) Dayton Palletized Facility	0 of 4	●
(11) Kingsridge	0 of 5	●
(12) Lenexa	2 of 16	◐
(13) Lee's Summit	6 of 17	◐
(14) Kansas City - Subtropolis	0 of 1	●
(15) Ft. Worth - Building 9	0 of 2	●
(16) Ft. Worth - John Burgess	0 of 5	●

[9]According to NARA officials, the San Francisco facility was constructed prior to the establishment of the requirement for supplemental protective measures for pipes that run through records storage areas.

Facility	Number of noncompliant bays	Compliance
(17) Denver - Broomfield	0 of 4	●
(18) Riverside	0 of 4	●
(19) San Francisco	7 of 7	○
(20) Seattle	0 of 8	●
(21) Anchorage	1 of 1	○
(22) National Personnel Records Center - Archives Drive	0 of 15	●
(23) National Personnel Records Center Annex - Valmeyer	0 of 11	●
(24) Washington National Records Center	0 of 20	●

Key:

●- The facility's bays were determined by NARA to be compliant.

◐- The facility had bays that were determined by NARA to be compliant and bays that were determined by NARA to be noncompliant.

○- The facility's bays were determined by NARA to be noncompliant.

Source: GAO analysis of NARA documentation.

As of July 2013, NARA indicated that it had plans to address the deficiencies at the noncompliant federal records centers, although it had not established schedules for doing so at the San Francisco and Anchorage facilities. For example, to correct the shelving at the Lenexa and Lee's Summit facilities, NARA had plans to contract for a detailed inspection of the existing shelving, prepare a report identifying necessary repairs, and then conduct the repairs and/or replacement of the noncompliant shelves. It expected to award a contract for this work in August 2013 and to complete the work within the following 6 months. In addition, NARA officials responsible for facility compliance had developed a plan for corrective actions at the San Francisco facility. This plan calls for the installation of water sensing cables and protective drip pans and guttering to provide supplemental protection of pipes that run through records storage areas. However, the plan does not include a schedule for completing these tasks consistent with standard practices for program management. NARA officials responsible for facility compliance attributed the lack of a schedule to uncertainty about the availability of funding and personnel resources to execute the plan. Further, NARA facility managers developed plans to replace the existing Anchorage, Alaska facility with a newly constructed facility. However, NARA did not have a schedule for completing the construction because it had not secured funding to construct the new facility.

While NARA has stated that it plans to bring all of its federal records center facilities into compliance with applicable regulations, the agency has not established a schedule for doing so at all facilities. Thus, although NARA has determined that the vast majority of the space (i.e., bays) in which its facilities store records is fully compliant with applicable standards, NARA has not established a basis for tracking and reporting progress toward resolving deficiencies at all of its facilities that do not yet fully meet the standards.

NARA Has Not Inspected and Validated Compliance for the Majority of Agency and Commercial Records Storage Facilities

Agencies must obtain approval from NARA to store federal records at their own or a commercial records storage facility and, to do so, must provide documentation to show that the facility satisfies the requirements of 36 C.F.R. Part 1234.[10] After a facility is approved, agencies are able to store federal records at the facility and an inspection may be conducted to ensure that the facility meets the requirements of the standard. According to NARA officials responsible for determining facility compliance, inspections have been an important means of determining whether facilities are in fact compliant with the requirements.

NARA has approved 10 of the 18 agency facilities that agencies have reported using. According to NARA officials, the remaining 8 centers were not approved because the agencies that operate them did not provide NARA with sufficient documentation to support approval. NARA has approved all 22 identified commercial facilities.

However, of the 10 approved agency records centers, 1 had been inspected; and of the 22 approved commercial facilities, 13 had been inspected (1 inspection was deemed unfavorable and the facility was removed from the approved list). For the 9 agency records centers and 10 commercial facilities that had not been inspected, NARA provided a schedule for doing so. According to this schedule, NARA plans to inspect 4 facilities per fiscal year from fiscal years 2014 through 2017, with the remaining 3 facilities scheduled for inspection in fiscal year 2018. For the commercial facilities, NARA had scheduled all 10 of the remaining facilities, with the last of these inspections planned in fiscal year 2017.

[10]Requirements for NARA's approval of agency records centers are set out in 36 C.F.R. § 1234.30. This regulation also requires that an agency ensure and provide documentation to NARA that a commercial records storage facility in which the agency stores its records complies with the 36 C.F.R. Part 1234 requirements.

Until all facilities are inspected, NARA cannot be reasonably assured that agencies are storing federal records in facilities that comply with standards, thus increasing the risk that these records will be damaged.

NARA Has Taken Steps to Minimize Permanent Damage to Records in Federal Records Centers, but Does Not Always Track the Results of Its Efforts

In keeping with NARA's mission to safeguard and preserve the records of the U.S. government, the agency has a process in place to handle incidents in which records could potentially become damaged at its federal records centers. In particular, NARA requires its federal records centers to follow the Emergency First Response for NARA Records checklist to facilitate the protection of federal records from further impact and/or permanent damage when an incident occurs. As part of the agency's 1561 directive,[11] the checklist requires (1) notification and immediate actions, such as notifying management; (2) an initial response, including steps to take if water damage occurs; and (3) damaged records response operations, including the requirement to document NARA's immediate response to incidents in an after-action report and a general requirement to provide a report after completing follow-up activities. Additionally, internal control standards specify, among other things, the need for significant events to be clearly documented.[12]

In addition to the checklist requirements, NARA's Chief Operating Officer told us about specific steps NARA is to take when boxes of records get wet. For example, based on the volume of records that are involved and available resources, boxes are to be air dried and stored in an onsite freezer or in freezer trucks to minimize the growth of mold and prevent or reduce potential damage to records. Boxes of records are then to be individually removed, treated, and dried, or sent to a contractor that can freeze dry various types of records. NARA is also to use in-house restoration services, such as industrial fans, for incidents that are considered minor. For major incidents (where affected records are not expected to be available to the agency that owns them for more than 48 hours), NARA's process indicates that it will work with a contractor for drying services.

[11]This directive was established for records emergency preparedness and recovery in NARA facilities.

[12]GAO, *Standards for Internal Control in the Federal Government,* GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999).

NARA generally followed its process to prevent damage to records when incidents occurred. Documentation that we reviewed for 55 incidents that NARA reported as occurring from January 2009 through March 2013 indicated that the agency had taken steps consistent with its Emergency First Response for NARA Records checklist.[13] For example, NARA provided documentation of steps taken to handle incidents at the Washington National Records Center and at the National Personnel Records Center in Valmeyer, Illinois from March 2011 through August 2012.

Specifically, at the Washington National Records Center:

- A roof leak incident in March 2011 impacted 47 cubic feet of records stored at the center. According to NARA's documentation, 2 cubic feet of records were placed on drying racks and dried, 3 cubic feet of records were reboxed, and the remaining records were air dried in their original boxes.

- During another roof leak at the center in May 2011, a large number of boxes of records became wet. NARA staff noted the locations of the leaks, notified management, and took steps to address the incident. The staff initiated triage efforts to relocate the records to another area to determine how the incident had affected the records. While some records were air dried, those that were substantially wet were placed in a freezer truck. After the records were held in the freezer truck for several days, NARA reassessed them, and removed and reboxed records that had dried. The remaining 252 cubic feet of wet records were freeze dried at an offsite facility. NARA documented the actions it took to address the wet records and the center director notified the affected agencies.

- A roof leak that occurred at the center in June 2011 affected 7 cubic feet of records. NARA documented the actions it took, noting that 5 cubic feet of records were reboxed, and the remaining records were air dried.

[13]We assessed incidents of potential records damage that occurred at federal records centers from January 2009 through March 2013. The incidents that occurred during this time frame were specific instances involving water, in which federal records could have been permanently damaged or destroyed.

- Another roof leak later that month resulted in a large number of boxes of records becoming wet. NARA staff noted the locations in which the leaks occurred, notified management, and took actions to address the records involved in the incident. The staff initiated triage efforts to relocate the records to another area and determine the level of severity for the affected records. Records that could be dried with minimal effort were removed from boxes and placed on pallets to begin the air-drying process onsite. Records that were found to be substantially wet were placed in a freezer truck. After the records were held in the freezer truck for several days, NARA reassessed them and determined that some of the records had dried. While the dry records were removed from the freezer truck and reboxed, 414 cubic feet of records were freeze dried at an offsite facility. NARA documented the actions it took to address the wet records and the center director notified the affected agencies.

In addition, at the National Personnel Records Center (Valmeyer):

- A sprinkler leak in August 2012 affected 27 cubic feet of records. Five of the 27 cubic feet of records were determined to not be wet and 18 cubic feet of records were removed from the location and dried. The remaining 4 cubic feet of records were reboxed.

While NARA has taken steps to minimize damage to records, the agency has not tracked the results of its efforts in all cases. For example, of the 55 incidents, NARA provided documentation that verified that the actions it took in responding to 46 incidents resulted in no permanent damage to records. For the remaining 9 incidents, officials stated that NARA's actions prevented permanent damage to records; however, the agency could not provide documentation that would allow us to verify this assertion. For example, NARA could not provide documentation that described the results of its efforts to prevent permanent damage to 6 cubic feet of records that became wet due to faulty floor and roof drains at the Chicago Federal Records Center in June 2011. A contributing factor is that while the NARA 1561 checklist provides generally defined requirements for final reporting, it does not require the federal records centers to document the results of the actions they have taken to prevent permanent damage to records that were at risk. As a result, NARA is not positioned to fully report on the effectiveness and outcome of its actions to minimize damage to records and does not have an institutional record that a third party can use to validate the results of its efforts.

Federal Record Centers Storage Fees Are Developed Annually and Are Comparable to Commercial Vendors' Fees

The Treasury and General Government Appropriations Act, 2000, established a Records Centers Revolving Fund to pay for expenses and equipment necessary to provide storage and related services for federal records.[14] Accordingly, the Federal Records Centers Program and NARA's Office of the Chief Financial Officer are responsible for annually developing the fees charged to agencies for records storage and related services. These fees are to be developed for the upcoming fiscal year using the current fiscal year fee schedule, expense projections, and workload projections for NARA's records centers. In determining the fees, it is to consider costs associated with full operation of the records storage facilities, taking into consideration expenses, such as reserves for accrued annual leave, worker's compensation, depreciation of capitalized equipment and shelving, and amortization of IT software and systems. Annually, all federal records centers are required to submit expense[15] and workload[16] projections to the Federal Records Centers Program headquarters operation. The expense and workload projections are used to develop budget and revenue projections, which are then used as the basis to develop rates for the upcoming fiscal year. Factors such as inflation, customer impact, the frequency of rate change, and competitiveness with the private sector are then considered when developing new rates.

The fees developed for the upcoming fiscal year are approved by the Director of the Federal Records Centers Program, Executive for Agency Services, Chief Financial Officer, and Chief Operating Officer before receiving final approval from the Archivist. According to NARA officials responsible for managing the Federal Records Centers Program, the newly developed fees are then used at all federal records centers for the upcoming fiscal year.

[14]Pub. L. No. 106-58, title IV, 113 Stat. 460-461 (1999), as amended by Pub. L. No. 108-383, § 3, 118 Stat. 2218 (2004).

[15]The expense projections provide data on the existing annual expense budget, current year-to-date spending levels, and projections for revenues and costs of items, including personnel costs and benefits, rent, communications and utilities, supplies and materials, transportation, equipment, and contractual services.

[16]The workload projections provide data for 3 prior years of workload data, midyear data for the current fiscal year, and projections for the amount of work required for storage and services, such as storage and disposition, at federal record centers.

Storage fees charged by NARA in fiscal year 2013 were comparable to fees charged by commercial vendors on the GSA schedule in that same time frame. Specifically, of the 12 commercial vendors that provided storage services for 11 federal agencies, 5 had price lists that were posted on GSA's Federal Acquisition Service webpage. Table 6 provides a comparison of storage fees for NARA and these 5 commercial vendors for fiscal year 2013.

Table 6: Comparison of Federal Records Centers and Commercial Vendors' Storage Fees from the GSA Schedule

	Vendor 1	Vendor 2	NARA	Vendor 3	Vendor 4	Vendor 5
3,600 cubic feet or less	$0.145	$0.16	$0.23	$0.25	$0.27	$ 1.25
Between 3,600 and 48,000 cubic feet	$0.145	$0.16	$0.23	$0.25	$0.27	$ 0.50
Between 48,000 and 50,000 cubic feet	$0.145	$0.16	$0.23	$0.25	$0.27	$ 0.38
50,000 cubic feet, up to 99,999 cubic feet	$0.135	$0.16	$0.23	$0.25	$0.27	$ 0.38
100,000 cubic feet up to 499,999 cubic feet	$0.135	$0.16	$0.23	$0.25	$0.18	$ 0.38
500,000 cubic feet or more	$0.135	$0.15	$0.23	$0.25	$0.18	$ 0.38
Minimum not met	$65	n/a	n/a	$25	$100	n/a

Source: GAO analysis of agency and GSA schedule data.

Note: Each of the commercial vendors has at least one facility that is compliant with 36 C.F.R. Part 1234.

As shown in the table, NARA's fee of $0.23 per cubic foot was consistent regardless of the storage quantity. Specifically, NARA's fee was higher than fees charged by vendors 1 and 2, although its fees were lower than those of vendors 3 and 5. In addition, NARA's fees were lower than those of vendor 4 if storing less than 100,000 cubic feet and higher if storing 100,000 or more cubic feet. NARA also did not charge additional fees that certain vendors charged. Specifically, vendors 1, 3, and 4 applied a $65, $25, and $100 fee, respectively, to a customer's account when the storage charges did not meet the customer's contractual minimum storage requirement. In addition, vendor 4 charged an administration fee of $25.12 or $62.80 per account, respectively, for summary or detailed billing.

Conclusions

Although federal regulations call for records to be stored in one of three types of facilities—NARA-operated federal records centers, agency records centers, or commercial records storage facilities—the extent to which agency and commercial facilities are used to store records is uncertain because NARA does not know where all agencies store their records. NARA's efforts to collect data from agencies about the facilities

they use to store records have yielded data that are incomplete, outdated, and of questionable validity.

NARA has determined that most of its federal records center facilities are fully compliant with the standards established in regulations, but that four facilities are partially or entirely noncompliant—a situation that increases the risk of damage to the records stored in the facilities. Although it has plans for bringing these four facilities into full compliance with the regulations, NARA has not established dates for completing its plans at two of the facilities. As a result, NARA does not have a basis for determining progress toward correcting deficiencies in those facilities that do not fully meet the standards

Additionally, although NARA has taken steps to prevent permanent damage to records in their facilities on a total of 55 occasions over a recent 4-year time period, the federal records centers did not always keep track of the results of their efforts and were unable to provide documentation confirming they were successful in 9 cases. Therefore, NARA is not positioned to fully report on the effectiveness of its actions to minimize permanent damage to federal records.

Recommendations for Executive Action

To assist NARA in its responsibility to ensure that federal records are stored in compliant facilities, we recommend that the Archivist of the United States direct the Chief Operating Officer to take the following three actions:

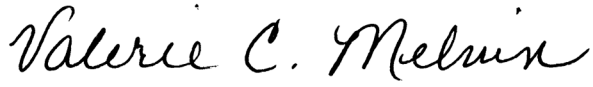
- Place increased priority on the collection of complete, current, and valid information from agencies about their use of agency and commercial records storage facilities.
- Develop a schedule for executing plans to resolve issues at each of the federal records centers that is not fully compliant with 36 C.F.R Part 1234.
- Clarify NARA's checklist for handling incidents that may involve permanent damage to records by including a requirement to document the results of the steps taken to minimize permanent damage to records.

Agency Comments and Our Evaluation

NARA provided written comments on a draft of this report, which are reprinted in app. II. In its comments, the agency concurred with all three of our recommendations for executive action regarding facility inspections and other areas related to safe storage of federal records. In addition, we received technical comments via email from NARA, which we have incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees; the Archivist of the United States; and other interested parties. This report also is available at no charge on the GAO website at http://www.gao.gov.

Should you or your staffs have any questions on information discussed in this report, please contact me at (202) 512-6304 or melvinv@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.



Valerie C. Melvin
Director
Information Management
and Technology Resources Issues

Appendix I: Objectives, Scope, and Methodology

Our objectives were to (1) determine the types of facilities agencies use to store federal records and the extent to which NARA's data on agencies' use of storage facilities are complete, (2) evaluate the extent to which NARA has determined these facilities to be compliant with standards in 36 C.F.R. Part 1234, (3) determine what actions NARA has taken to minimize damage to records in federal records centers and the extent to which it documents such efforts, and (4) determine how NARA determines storage fees and whether fees differ among facilities.

To accomplish the first objective, we reviewed 36 C.F.R. Part 1234 and developed a thorough understanding of the regulation through discussions with NARA officials who are responsible for administering it. We then obtained lists of NARA, agency, and commercial records storage facilities from NARA. These lists included NARA's central registry of approved facilities. We corroborated the lists by comparing them with other documentation such as facility approval memoranda and inspection schedules, as well as through interviews with agency officials. Additionally, we obtained NARA's database of agencies' records storage facilities and discussed NARA's methods for populating the database with responsible NARA officials. We determined the database to be unreliable because it was incomplete, outdated, and largely reliant on self-reported data from agencies.

For the second objective, we obtained and reviewed memoranda from NARA that indicated approval of NARA, agency, and commercial records storage facilities and the facilities' compliance with 36 C.F.R. Part 1234. We then used additional documentation, including detailed facility inspection checklists, fire inspection reports, and structural engineering reports to determine the existence of support for NARA's approval determinations. We also discussed NARA's method for approving and inspecting facilities, in addition to plans for conducting future facility inspections with the officials who are responsible for performing the inspections.

To accomplish the third objective, we reviewed NARA policies and procedures for the storage and management of federal records and compared them with applicable internal control standards. We also reviewed procedures for handling records damage in NARA records centers and documentation relative to records emergency planning and training. We collected and analyzed documentation on 55 incidents that occurred at NARA records centers from January 2009 through March 2013, including reports that described NARA's actions to mitigate or reduce records damage. We also compared requirements in NARA's

1561 checklist to the documentation described above. Further, we interviewed NARA officials to determine the actions taken to minimize records damage in federal records centers and corroborated the officials' statements with aforementioned documentation.

To accomplish the fourth objective, we obtained and analyzed documentation from the NARA Federal Records Centers Program and General Services Administration (GSA) schedules that identified and discussed records storage fees and then compared fees among records storage facilities. To determine the reliability of the data provided from NARA, we performed basic steps to ensure the data provided were valid, and reviewed relevant information describing the data. We reviewed documentation related to the data sources, including NARA's fiscal year 2013 fee schedule, fee determination process description documents, and workload and expense projections. Although we could not independently verify the reliability of all this information, we compared the data with other available supporting documents to determine data consistency and reasonableness. We also obtained price lists from GSA's website for commercial vendors that listed facilities that are compliant with 36 C.F.R. Part 1234. We did not determine whether individual agencies had negotiated lower prices than those listed in the price lists. We compared storage fees for NARA and commercial vendors by extracting fee data from NARA's fee schedule and commercial vendor price lists. For our comparison, we reviewed the publicly available price lists for five commercial vendors (referred to as vendors 1-5 in our analysis). Four of the five vendors' price lists charged storage fees based on cubic feet of storage per month and the fifth vendor charged based on the number of boxes stored.[1] In order to directly compare fees established by NARA and the five vendors, we converted boxes to cubic feet for vendor 5. Storage fees were then arranged in order from lowest to highest.

We supplemented our analyses with interviews of NARA officials who are knowledgeable about the Federal Records Centers Program, including NARA's Chief Operating Officer, the program director, and assistant director. We also interviewed representatives of private sector record storage companies that were relevant to our study.

[1]The size of one box is approximately 1.2 cubic feet. In order to directly compare fees established by NARA and the five vendors, we have converted boxes to cubic feet for vendor 5.

We conducted this performance audit from November 2012 to September 2013 in accordance with generally accepted government auditing standards. 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.

Appendix II: Comments from NARA

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ARCHIVIST *of the* UNITED STATES

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30 August 2013

Valerie C. Melvin
Director, Information Management and Technology Team
United States Government Accountability Office
44 G Street, NW
Washington, DC 20548

Dear Ms. Melvin:

Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO's) draft report 13-668 titled "Actions Needed to Ensure Facilities That Store Federal Records Meet Standards." We appreciate your attention to concerns regarding facility inspections and other areas related to safe storage of Federal records. The report contains three recommendations for executive action. NARA concurs with all recommendations.

If you have any questions regarding this memo, please contact Carla Riner, Deputy Chief Operating Officer, at 301-837-0643 or via email at carla.riner@nara.gov.

Sincerely,

DAVID S. FERRIERO
Archivist of the United States

Via email to: Valerie C. Melvin, MelvinV@gao.gov
Mark Bird, BirdM@gao.gov
Elena Epps, EppsE@gao.gov

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Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Valerie C. Melvin at (202) 512-6304 or melvinv@gao.gov

Staff Acknowledgments

In addition to the contact name above, the following staff also made key contributions to this report: Mark Bird, Assistant Director; Sharhonda Deloach; Elena Epps; Rebecca Eyler; Jacqueline Mai; and Constantine Papanastasiou.

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