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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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December 29, 1978

The Honorable Jack Brooks
Chairman, Select Committee on
Congressional Operations
House of Representatives



Dear Mr. Chairman:

Your October 13, 1978, letter asked us to ^{of the} review the conditions under which personal papers of Members of Congress are stored by the National Archives and Records Service. Our review disclosed only negligible inventory discrepancies and some minor problems, as discussed below, in the areas of security and environmental protection. Therefore, we believe that procedures and practices of the records centers visited are generally adequate for storing and protecting the personal papers of Members of Congress.

We did find, however, a potentially serious problem throughout the records centers. Maintenance and repairs of the centers--the responsibility of the Public Buildings Service, General Services Administration--take an unreasonably long time and account for several of the problems we found in center security and protection from environmental hazards.

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SCOPE OF REVIEW

Our work was aimed at verifying the presence of Members' records in Federal centers; evaluating the centers' record-keeping practices as they relate to Members' records; evaluating the physical condition and protection afforded the records from environmental hazards; and evaluating the security procedures and practices at the records centers.

In the course of our review, we visited the Federal records centers at Waltham, Massachusetts; Bayonne, New Jersey; Philadelphia, Pennsylvania; Chicago, Illinois; San Bruno, California; Laguna Niguel, California; and the Washington National Records Center in Suitland, Maryland. We also held discussions with officials at the Office of Federal Records Centers, and Public Buildings Service headquarters in Washington, D.C.

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Report
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In addition to personal observation of the presence, physical condition, and security of Members' papers, we reviewed related General Services audit reports on Federal records centers and inspections of the centers made by General Services headquarters officials. We also interviewed personnel in the centers to determine the current status of problem situations identified in those reports.

Because Members' records are considered "personal" under existing law, our inventory of the records was limited to verifying the existence of the cartons containing the records. We did not inspect the contents of the cartons.

PHYSICAL INVENTORY

The General Services Administration provides courtesy storage for personal records of Members of Congress in records centers during the Members' term of office. Federal records center storage of records is less costly than storage in Federal office space because the records are stored in high-density, low-cost warehouse-type space.

As of October 4, 1978, Federal records centers stored 29,841 cubic feet of Members' records in 7 records centers. All but 550 cubic feet of these records were stored in the Washington National Records Center. We performed a complete physical inventory of the Members' records in all but the Washington center where we took a 17 percent sample.

General Services maintains a computer tracking system for locating over 13 million cubic feet of records stored in its centers. From this system General Services provided us with a report on all Members' records, the volume of the records, and their center location. From the report on these records and backup documents in the records center files, we performed our inventory. We sought to determine whether the records were stored in the location and quantity indicated by the General Services report. Where discrepancies were found we traced the errors to the backup documents and other center files.

Our inventory disclosed 23 discrepancies between the General Services report and the cited location or volume of Members' records stored. In all but two instances we were able to trace the discrepancy to the problems identified in the following table.

<u>Problem</u>	<u>Number of occurrences</u>
Withdrawal of records from the center not recorded	8
Records charged out; no charge-out card on shelf	1
Keypunch errors	
(a) location	2
(b) volume	6
Relocation of the records without updating system	2
Minor shelving errors	<u>2</u>
	<u>21</u>

At the Washington center we identified two instances, involving one box each, in which our inventory count did not correspond with either the inventory report or the source documents. Center officials told us they believe the two missing boxes were withdrawn by the Members but the withdrawals were not recorded in the inventory system. When such problems are identified and cannot be resolved, the center contacts the agency or Member to determine whether the records were indeed withdrawn. Center officials advised us they plan to contact the two Members' offices to resolve the discrepancies we found.

Considering the volume of records stored in the General Services centers and the minor discrepancies found, we believe procedures and practices of centers are generally adequate for storing and relocating Members' records.

PHYSICAL CONDITION AND ENVIRONMENTAL CONTROLS

Since we did not open or look into the boxes of Members' papers, our comments on the physical condition of these papers are based solely on the observed physical condition of their containers.

In the six regional centers, we found only one instance of physical damage. In the Bayonne, New Jersey, Federal

Records Center, one box was slightly crushed, apparently from rough handling.

Additionally, in the Washington center our sampling revealed only one instance of obvious damage to boxes and, possibly, their contents. Five of 14 boxes of one Member's personal papers had suffered apparent water damage. In cases of wet or otherwise damaged records, it is the records centers' standard procedure to dry and otherwise repair and re-box records. If damage is considered severe, center personnel will notify depositors of such records. Otherwise, the records are returned to storage after repair. In this case, center personnel had examined the contents of the five boxes, determined them to be undamaged, had dried the boxes and returned them, repacked, to storage.

General Services has issued a set of facility standards-- Federal Archives and Records Center Facility Standards--to all of its records centers in which General Services specifies minimum acceptable requirements for systems and procedures designed to protect records from damage and deterioration. Additionally, General Services performs inspections of every records center at least every 2 years. Among other things, the inspections cover prevention of, and protection from, environmental hazards.

In the centers we visited, we found that the General Services standards are generally followed. However, the General Services inspection team has identified problems in the centers, and we found some of these problems remain uncorrected. The noteworthy situations are reflected in the table below.

<u>Problem</u>	<u>Year first reported</u>	<u>Center</u>
Combustibles stored in building (note a)	1976 1977	San Bruno Washington
Areas of building without sprinklers	1977	Washington

a/Although this potential hazard has been identified in several General Services inspection reports, Public Buildings Service workers continue to leave combustible materials in records center buildings from time to time.

<u>Problem</u>	<u>Year first reported</u>	<u>Center</u>
Some broken fire doors	1977 1977	Waltham Washington
No fire extinguisher in vault	1978	Bayonne
Need smoke detectors, exhaust fans and an alarm	1977	Philadelphia
Humidity controls sometimes malfunction	1975 Continuous	Chicago Philadelphia
Consistently high humidity	1976	San Bruno
Roof leaks	1975 1975 1976	Chicago Laguna Niguel Bayonne
Sewer backs up through floor drains	1975	Chicago
Building repairs needed		All centers

Poor maintenance and repair service is a problem shared by all of the records centers we visited. The Public Buildings Service, General Services Administration, is responsible for maintenance and repairs at the records centers; however, center officials advised us they have tried, often unsuccessfully, to have problems corrected. For instance, the problem of roof leaks in the Laguna Niguel center has been a serious one since the center was first occupied in 1975, and repairs are not planned until after April 1979 at the earliest.

The Service provided us with a current Repair and Alteration Work Item Inventory for the records centers we visited, in which projects are identified for planned design and construction. A Service official explained that work items such as basic repairs and roofing repairs should take high priority; however, only five of the items mentioned above were identified in the inventory as of December 8, 1978. We were told that being included in the inventory does not guarantee that a project will be completed since the inventory always exceeds

funding. Additionally, we noted that, for projects in the inventory, the average length of time between origination of a project and its planned construction date is 2.8 years. As a result, correction of many of the center repair problems may be in the distant future.

We are in the final stages of a review of General Services' repair and alteration of Government facilities. Because of our ongoing work in this area and the time frame for reporting to you on storing the personal papers of Members, we did not further pursue this matter. We will provide you a copy of our report on the repair and alteration of Federal buildings.

SECURITY

The "Federal Archives and Records Center Facility Standards" issued by General Services provide specifications on the construction of records centers and the inclusion of various locks, anti-intrusion and other security alarm systems, as well as requirements concerning vaults within the storage areas.

We noted many security procedures and systems in effect during this review, including the following.

- Access limited to authorized persons only.
- Limited distribution of keys to facility.
- Entrance to storage areas and vaults by computerized "key cards"; also, sign-in at vaults.
- Automatic burglar alarms; electronic anti-intrusion alarms.
- Automatic detection devices.
- Employee badges.
- Visitor control.
- Daily security checks.
- Fencing and exterior lighting.
- Employee awareness.

In addition to the security systems and procedures in effect at records centers, most of the center directors agree that an extra security measure exists in the sheer volume of material stored at Federal records centers; in the absence of collusion with a center employee, it would be very difficult and time consuming for someone to gain access to particular materials without knowing the exact location of those materials and the shelving system of the particular records center.

In our opinion, the security provided Members' personal papers is generally adequate but requires attention in some records centers. The problems we noted are summarized below.

Philadelphia Center

Building shared with other tenant(s); public passageways throughout.

Needs cypher locks and an electronic intrusion alarm system.

Laguna Niguel Center

Two of four monitoring cameras defective, awaiting repairs.

Personnel lax in implementing security procedures.

Chicago Center

No written procedures for opening and closing center daily.

Perimeter door locks are not "pick proof."

Large holes in exterior fencing.

No locks on doors between storage area and public corridor.

In our test of the security system at Laguna Niguel, the center director opened a hall door controlled by an intrusion alarm. The security guard, who admitted seeing the warning light, did not respond, nor did any of the personnel from the director's office. The center director notified the Federal Protective Service of this problem. Effectiveness of many features of center security systems depends on the alertness and awareness of center personnel. The conscientious employee is an integral part of a successful security system.

OTHER MATTERS

An excerpt from the House of Representatives files manual states, "Since these documents are the personal property of the legislator involved and not records of the Government, the Center stores them on a courtesy basis. When the legislator leaves office, instructions for removal of the records to private space should be given to the Center."

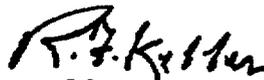
Several records centers, including the Washington center, continue to store the personal papers of some former House Members. The centers have attempted to contact these persons and, in most instances, some workable arrangements for removing the papers have been made. There are cases in which former Members have not replied to numerous records center inquiries, but, for the most part, the House files manual's procedure is followed.

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At your request, we did not obtain agency comments on the report. Further, as agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution until 30 days after the date of this report. At that time, we will send copies to the Administrator of General Services and other interested parties and make copies available to others upon request.

Please let us know if we can be of further assistance.

Sincerely yours,



ACTING Comptroller General
of the United States