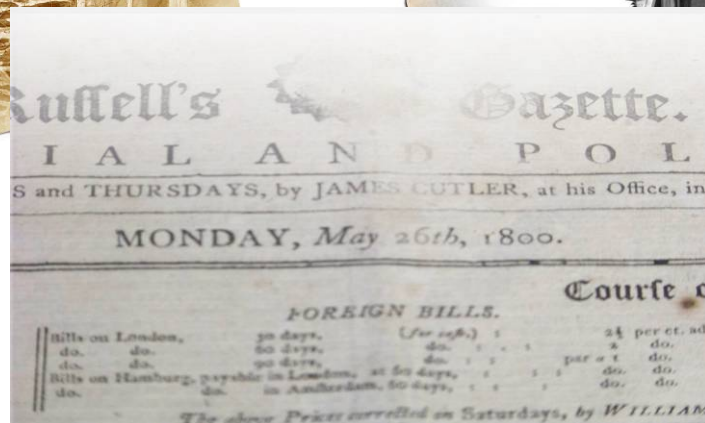




U.S. Department of the Interior Office of Inspector General

HISTORY COLLECTION IN JEOPARDY AT HARPERS FERRY CENTER



Report No. Y-EV-NPS-0004-2008

July 2008



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, DC 20240

JUL 25 2008

Memorandum

To: Mary A. Bomar
Director, National Park Service

for From: Earl E. Devaney *Mary A. Bomar*
Inspector General

Subject: History Collection in Jeopardy at Harpers Ferry Center
(Report No. Y-EV-NPS-0004-2008)

Recently, a National Park Service (NPS or Service) investigator questioned the accountability of Harpers Ferry Center (Center) museum property and brought his concerns to our attention. We initiated an evaluation to determine whether artifacts at the Center are adequately safeguarded.

This report presents the results of our evaluation of the Center's management of the NPS History Collection, which includes items of cultural and historical significance. We also evaluated museum property in the custody of the Conservation Services Group (CSG or the Group) of the Center. We do not discuss artifacts in CSG custody here since the Group appears to have effective controls in place and functions as a temporary custodian.

We found long-standing problems that endanger artifacts in the Center's History Collection, such as Ansel Adams photographs, records and journals of Civil War General Abner Doubleday, and the first NPS uniforms. This report contains four recommendations, which, if implemented, should reduce the possibility of damage, loss, or theft of artifacts currently at risk. We believe that the most pressing needs are to (a) move Collection artifacts housed in the Anthony Library to a more secure and environmentally suitable location and (b) determine who should have permanent custody of the Collection.

We would appreciate being apprised of the actions NPS takes on our recommendations so we may track the status of their implementation. Please have a written response forwarded to this office within 30 days, identifying plans to address the findings and recommendations cited in this report.

Should you have any questions about this report, please do not hesitate to contact me.

WHY WE PERFORMED THIS EVALUATION

We initiated this evaluation in response to concerns raised by an NPS investigator. We evaluated Center management to determine whether museum artifacts are adequately safeguarded. For purposes of comparison, we visited the Gettysburg National Military Park (NMP) and the Chesapeake and Ohio (C&O) Canal National Historical Park (NHP) to assess the management of their museum collections.

BACKGROUND ON HARPERS FERRY CENTER AND THE NPS HISTORY COLLECTION

The Harpers Ferry Center was created in 1970. It is distinct from the Harpers Ferry National Historic Park. The Center helps other NPS entities present items of natural and cultural significance to the public by providing exhibit planning, design, and development services. Center personnel also provide preservation services for museum property belonging to other NPS entities. The Center is one of six National Program Centers that provide technical and support services to regions and park units. The six centers, including Harpers Ferry Center, are part of NPS headquarters.

Most of the museum artifacts housed at the Center are part of the NPS History Collection. The late former NPS Director Hartzog established the Collection in 1971 to illustrate and document NPS history and culture. The Collection is divided into three main groups, each including items of historical and/or cultural significance:

Historic Photographs — This group consists of historic photographs (prints, negatives, and slides), moving images (film and video tape), and associated records dating from the mid-19th century to the present. The group includes works by well known photographers, such as Ansel Adams, as well as by private photographers. It also includes material created by NPS employees, such as film shot during the 1920s by the second NPS director. The Service estimates that 3 to 5 million items comprise this group¹. Only a small portion has been cataloged².

¹ This estimate is from FY 2004. We used this estimate because estimates in the Collection Management Reports include both Historic Photographs and Archives (non-photographic) under archival items

² Due to uncertainties regarding the numbers provided by NPS, we were unable to determine the portion of the group cataloged.

Archives (non-photographic) — This group consists of documents and audio tapes that largely concern NPS history. Material includes, but is not limited to:

- a. Records and journals of Civil War General Abner Doubleday;
- b. Personal and office papers of former NPS officials, including those of a chief historian³, a chief curator⁴, and an NPS director⁵;
- c. Tapes and tape transcripts from NPS oral history projects;
- d. Miscellaneous materials related to NPS history and projects, including the Bicentennial Celebration and conferences from 1911 to the present; and
- e. Rare books on a variety of topics that are valued for the significance of their content, scarcity, imprint, date of publication, or physical characteristics.

The size of this group has been estimated at over 200,000 items. Only a small portion has been cataloged.

Cultural Objects — This group consists of NPS ranger uniforms — including the first NPS uniforms and the uniform of the first female NPS director — and related insignia and accoutrements. It also contains other materials documenting NPS history and culture. A 2007 estimate places this group at approximately 7,500 objects. About 40 percent has been cataloged.

WHAT WE LEARNED

During our evaluation, we learned that:

- Lax security and poor physical conditions at storage facilities are compromising museum artifacts at Harpers Ferry Center;
- Poor documentation hinders Center ability to detect damage, destruction, or loss of compromised artifacts; and
- The usefulness of the Collection for research and cultural education is adversely affected by the poor facility conditions and documentation.

³ Ronald F. Lee Papers, 1947-1972.

⁴ Harold L. Peterson Papers, 1963-1977.

⁵ Hartzog Directorate Collection, 1964-1970.

INADEQUATELY SECURED AND HOUSED ARTIFACTS

The NPS History Collection is housed at the Anthony Library in Harpers Ferry, WV, and at the Willow Springs facility in Charlestown, WV. Most of the Archives (non-photographic) group is located at the Anthony Library, and the Historic Photographs and Cultural Objects groups are located mainly, if not entirely, at the Willow Springs facility. Willow Springs also houses museum items undergoing preservation treatments for other NPS entities.

Neither facility offers adequate security or a proper environment. By any measure, however, the lax security and poor physical conditions found at the Anthony Library fail to meet museum standards for housing collections. While the Willow Springs facility provides a safer and more secure environment, we identified some areas for improvement there, as well.

Anthony Library

In terms of security, the Anthony Library — which also circulates material — does not maintain tight control over facility access. For example, Center personnel were unaware of how many people had keys to the Library. Individuals known to have keys include Library personnel, facility maintenance staff, and curatorial staff. In addition, the layout of the Library makes it virtually impossible for the librarian to effectively monitor individuals. Entry can be gained either through the main entrance or by a lower-level side entrance to the basement.

Security is further compromised because rare books are intermixed with regular circulating material; they are not maintained in sequestered areas. In fact, Center personnel informed us that some rare books from the Archives (non-photographic) group have mistakenly been included in the circulating collection and were actually checked out. In such instances, significant pieces of American history could be forever lost.

With regard to physical conditions at the Anthony Library, Center personnel have observed and documented, as we did, temperature, humidity, vermin, and storage problems. The problems appear to be insurmountable.

Inadequate temperature and humidity controls. We found that the Anthony Library building cannot maintain the temperature and humidity levels required by NPS policies for housing museum collections. Further, staff members have not routinely kept temperature and humidity records.

Maintaining appropriate and consistent temperature and humidity conditions is essential in conserving museum artifacts. Too high a temperature or too low a humidity level can result



Water damage and mold in the Library

OIG staff photo

in paper becoming brittle; too high a humidity level can result in mold growth. Abrupt changes in temperature can be equally destructive. Temperatures in the Library fluctuate based upon outside temperature, and humidity is largely unregulated. According to Center personnel, the attic can become unbearably hot in the summer. During our site visit, we noted drastic temperature variations between the attic and basement levels of the Library.

In the basement, we saw Collection items exposed to extremes in temperature and humidity because they were stored next to steam pipes in the building's maintenance room. We also saw mold and exposed wires in the basement, which can threaten human health, as well as the Collection.

Dangerous insect and rodent infestations. Evidence of both insect and rodent infestations was apparent. Center personnel have observed, as we did, that cleaning throughout the Library is inadequate. This most likely led to and has perpetuated both infestations, which endanger museum artifacts.

We saw remnants of a rodent nest in a drawer containing maps and insect bodies lining window sills. Though we could not know how current the insect infestation actually is, we saw that sticky traps had not been changed in quite some time. There were no records of regular, recurring trap monitoring, which is necessary to assess the degree of any infestation.



Dead insects line Library window sills

OIG staff photo

Although an Integrated Pest Management Plan has been written, it clearly has not been adequately implemented at the Library.

Overcrowded and unorganized storage. The state of storage at the Anthony Library hinders the ability of Center personnel to manage and retrieve items in the Collection, making usability of the Collection difficult.



Blocked windows and vents at the Library
OIG staff photo

We found Collection items, some of which date to the 1800s, stuffed into every conceivable spot. Boxes, books, and documents were stacked on top of shelves and tables and on the floor, with little regard to access and use. Many work tables were covered with books, maps, photos, and other materials. In fact, the weight of material has bowed the shelves in several cabinets and caused the attic floor to sag and become uneven. Finally, boxes were blocking some heating, ventilating, and air conditioning system vents.

The Collection stored at the Anthony Library needs a more secure and environmentally sound facility. If a permanent move cannot be made quickly, the Willow Springs facility offers an interim solution. The NPS “Park Museum Collection Storage Plan” recommends that the NPS History Collection be consolidated at the Willow Springs facility but provides no date for action. Movement to the Willow Springs facility would require additional space at that facility since the current storage area at Willow Springs is already overcrowded.



Overcrowded Library work environment
OIG staff photo

WE RECOMMEND THAT NPS:

- 1. Move, as soon as possible, the Collection artifacts from the Anthony Library to a more secure and environmentally sound location.**

Willow Springs

We found that the Willow Springs facility is safer and more secure than the Anthony Library, although it also suffers from a number of problems. We believe, however, that conditions at Willow Springs, unlike those at the Library, can be readily improved. With regard to security issues at the Willow Springs facility, we found that:

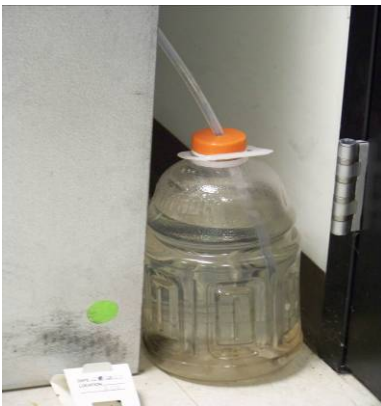
- No one knows how many people have keys to the Collection's storage area. We were told that the locks to the Collection's storage area would be changed but did not confirm that the work was done.
- Keys were left in a number of cabinets in the Collection's storage area; several cabinets did not lock.
- Artifacts in the Cultural Objects and Historic Photographs groups are stored in the same room. Therefore, anyone having access to one group has access to both.



Unsecured storage cabinets
OIG staff photo

These security issues are especially troublesome because between 25 and 30 visitors a month tour the cultural objects, with up to 15 visitors in a single group. In addition, researchers and others access the photo archives. In these circumstances, visitors could easily remove artifacts.

Regarding environmental conditions, we observed inadequate temperature and humidity control and monitoring. For example, we found that records of temperatures and humidity in storage rooms and temperatures of a freezer used to store nitrate film had not been kept since July 2007. Further, the FY 2007 facility checklist completed by the Center shows that appropriate temperature and humidity levels for photographs are not being maintained.



Improvised drainage system
OIG staff photo

We also saw an improvised drainage system for the freezer used to store nitrate films. While clever and functional, the system directs overflow to a Gatorade bottle. Lack of proper discharge could lead to water damage or freezer malfunction and damage to Collection items.

WE RECOMMEND THAT NPS:

- 2. Resolve the security and environmental problems identified at the Willow Springs facility.**

YEARS OF POOR DOCUMENTATION

Documentation of the Collection at Harpers Ferry Center has been lacking for years. As the NPS museum registrar stated in a 2002 e-mail, “It’s hard to come up with recommendations for collections management when you don’t even know what you have or where it’s located.”

Unknowable Losses and Damage

The registrar’s observation is relevant today for material housed at both the Anthony Library and at Willow Springs. For the most part, Center officials and staff still do not know what they have or where to find items that are cataloged. As a result, they have no idea what losses the Collection may have suffered or whether artifacts have been damaged.

Cataloging. According to Center reports, only about 11 percent of the items in the Collection had been cataloged by the end of FY 2007. Further, changes in the estimated size of the Collection make it difficult to determine what progress has been made. For example, the number of items classified as cataloged in the Center’s Collection management reports increased from 69,237 at the end of FY 2004 to 444,641 at the end of FY 2007. However, the Collection’s estimated size in the same reports, over the same time period, increased from 272,615 items to 4,196,729 items. Accordingly, the reported percentage of cataloged items dropped from 25 percent to 11 percent.

We do give the Center credit for increasing the number of items cataloged. With the exception of photograph cataloging, however, efforts have been intermittent. For example, photographs represent 66 percent of the increase in items cataloged between FY 2004 and FY 2007. The increase resulted from on-site support provided by a contractor and the NPS senior archivist. The

Cataloging is the process of recording detailed information about individual items or groups of related items. Catalog records tell you what objects you have, their condition, and their location.

Accessioning is the critical first step in the process of establishing accountability for museum items by documenting legal custody and ownership and how the items were acquired.

remaining 34 percent was cataloged inconsistently. For example, the Center reported cataloging over 1,000 cultural objects in FY 2004 but less than 100 in FY 2007. Similarly, the Center reported cataloging 250,000 Historic Photographs and Archives (non-photographic) groups items in FY 2007 but only 400 in FY 2005.

According to Center personnel, some catalog records are incomplete. We confirmed their assessment and estimate that about one in five electronic records lacks sufficient information to locate the item or items cataloged. Often the only detail on the location is the room, with no information provided to locate the item within the room. In some cases, the location is noted as “unknown.” We also observed that museum items were not always marked with their accession and catalog numbers.

Accessioning. Long-standing problems at Harpers Ferry Center with accession records — which may consist of a single item or of thousands or even millions of items each — have contributed to the poor cataloging. The accession records often lack a detailed description of the accession’s contents, making it difficult to match items in the Collection to the related accession. In addition, source information is often missing, making it difficult to trace the accession. For example, some accession records included only the name of the donor but no official donation form. In fact, according to the Center’s FY 2007 Collection Management Report, 96 of 174 sampled accession records lack adequate documentation of NPS ownership.

Not surprisingly, given the poor documentation, Center personnel have had great difficulty with the required annual museum property inventories. In FY 2007, Center staff could not locate well over half of the items associated with a random sample of 174 accession records, despite spending considerable time on the inventory. Further, they were unable to locate 5 of the items in a separate sample of 174 catalog records. Results for previous fiscal years are similar. The Center has no way to determine whether these items are lost, stolen, damaged, or somewhere in the overcrowded facilities.

Long History of Problems

Reports of the problems with NPS History Collection management and suggestions for corrective action, both internal and external, date back to at least 1991 (see Appendix 2). Unfortunately, limited progress has been made, which we attribute to the Center’s mission and its location within the NPS organization.

Mission. We believe the Collection has not been a management priority — we noted that the Harpers Ferry Center Service Plan (June 2007) mentions the NPS History Collection only once, when it identifies the Center as custodian of the Collection — because it does not

directly relate to the Center's mission. The Center's primary mission is to serve as a support unit to other NPS entities by providing exhibit planning, design, and development (interpretative) services. This role may explain, in part, why the Center has not devoted the staff resources or expertise needed to appropriately manage the Collection.

Location. Center personnel indicate that their ability to get support and funding for the History Collection has been limited because the Center does not fall under a region. Most museum collections are associated with park units, which fall under regional directors. In contrast, the Center reports directly to the Associate Director for Partnerships and Visitor Experience, who does not have responsibilities for any other museum collections. While Center staff members do fulfill their missions of providing interpretative and preservation support, they have not adequately supported their own Collection.

While NPS must determine who the custodian of the NPS History Collection should be, the limited improvements made in Collection management and the disconnect between the Center's mission and the Collection's purpose should inform that determination. Further, different parts of the Collection may be best managed by different entities, which may or may not be located within NPS. The National Archives and Records Administration (NARA) recommended in 1991, for example, that portions of the Collection's Historic Photographs group be transferred to it. Although NPS did not agree with this recommendation at the time, such a transfer may deserve reconsideration.

WE RECOMMEND THAT NPS:

- 3. Determine the appropriate entity or entities to control the NPS History Collection.**

BEST PRACTICES AT OTHER NPS ORGANIZATIONS WITH MUSEUM COLLECTIONS

We visited the museum collections at the C&O Canal NHP and the Gettysburg NMP to provide a basis for comparison. Our visits to both of these sites were limited in scope so we focused primarily on the facilities' accessioning and cataloging processes. At both C&O Canal NHP and Gettysburg NMP, we identified issues similar to those found at Harpers Ferry Center.

While the C&O Canal NHP has a backlog of 10,000 uncataloged photos, unlike the Center, it is in the process of implementing a corrective action. We found that the primary concern at this NHP is, rather, the lack of adequate storage facilities for museum items. Again, unlike at

the Center, this problem is being addressed. The Storage Facility Plan for all of the National Capital Region stipulates that all of the C&O Canal NHP museum property is to be moved to regional storage facilities.

At Gettysburg NMP, we found a history of cataloging problems much like those we saw at the Center and the C&O Canal NHP. However, Gettysburg NMP has fully implemented an effective process (defined in the Park’s Scope of Collection Statement). We tested the process and found that each item we requested was easily identifiable and traceable.

Finally, both parks, especially Gettysburg, have devoted considerably greater resources to their museum collections. Gettysburg has partnered with a nonprofit organization, the Gettysburg Foundation, which provided funding for a new museum. Most importantly, both Gettysburg NMP and C&O Canal NHP have been able to capitalize on the expertise within their regional museum centers. The discrepancy between how these two parks and the Harpers Ferry Center are able to address their problems highlights the need to re-examine the question of who should house the NPS History Collection. Whoever the custodian of the NPS History Collection will be could look to the Gettysburg NMP and C&O Canal NHP for best practices.

WE RECOMMEND THAT NPS:

- 4. Develop a detailed plan, with timelines and staffing levels, for documenting and cataloging Collection items. Individuals with appropriate expertise need to be involved in the preparation of the plan, and the plan implementation needs to be monitored.**

CONCLUSION

NPS should take several actions to address the safety, environment, and documentation of the NPS History Collection at the Harpers Ferry Center. First, the Service needs to stabilize the situation by moving the Collection items stored at the Anthony Library to a more environmentally sound and secure facility. Second, the Service needs to resolve the environmental problems at Willow Springs. Third, NPS needs to consider the purpose of the NPS History Collection and the question of who should have custody of it so as to both preserve the Collection and promote its use. Fourth, detailed plans to document and catalog Collection items — which depend upon the ultimate custodian of the Collection — must be developed and implemented.

SCOPE AND METHODOLOGY USED

We performed our evaluation in accordance with the President’s Council on Integrity and Efficiency and the Executive Council on Integrity and Efficiency “Quality Standards for Inspection.” The evaluation focused on the Harpers Ferry Center, and we reviewed controls over NPS museum artifacts there and at selected museums. We believe that the work performed provides a reasonable basis for our conclusions and recommendations.

As part our evaluation, we:

- Obtained a general understanding of Department of the Interior and NPS regulations and policies governing museum artifacts;
- Reviewed prior reports (we, as well as the U.S. Government Accountability Office and NARA, have reported previously on problems with maintenance of NPS museum property);
- Visited the Harpers Ferry Center, C&O Canal NHP, and Gettysburg NMP;
- Interviewed personnel responsible for museum artifacts at the three sites;
- Reviewed documentation and reports internal to the three sites visited; and
- Performed other work that we considered necessary.

SELECT REPORTS ON CENTER COLLECTION MANAGEMENT PROBLEMS

We list below selected reports that detail problems with museum property at Harpers Ferry Center.

- National Archives and Records Administration — “A NARA EVALUATION: The Management of Audiovisual Records in the National Park Service,” Washington, DC, May 1991.
- Internal Center report: “Status Report May 22, 2001 — NPS Cultural Material Collection.”
- “The National Park Service History Collection: A Preservation Plan of Action,” 2004. The report is based upon advice from the NPS museum registrar and the program manager for the NPS Museum Management Program.
- “DRAFT — Management Review for Department of Conservation, Harpers Ferry Center — July 25–29, 2005,” NPS chief curator.

Report Fraud, Waste, Abuse, and Mismanagement



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