In Brief

Collections Stewardship at the Cooper-Hewitt, National Design Museum
Report Number A-11-02, September 12, 2011

Why We Did This Audit

We conducted an audit of collections stewardship at the Cooper-Hewitt, National Design Museum to assess whether (1) physical security is adequate to safeguard the collections, (2) inventory controls are in place and working adequately, and (3) controls over the preservation of collections are adequate.

What We Found

We found that Cooper-Hewitt’s controls over inventory, physical security, and preservation were generally adequate. We also identified some opportunities to strengthen the management of inventory and security. Specifically, the Museum needs to develop a more detailed plan to ensure records are updated and needs to ensure proper segregation of duties within its inventory system. We also found that the Office of Protection Services (OPS) needs to provide more oversight of operations at the Newark facility.

What We Recommended

We made five recommendations to ensure that Cooper-Hewitt: (1) reconciles the TMS, accession, and object records; (2) identifies incomplete records in TMS and update them; (3) establishes internal controls within the combined storage area to ensure individuals only have access to collections that are a part of their official duties; (4) OPS Operations Division obtains and reviews the security reports and oversees management of keys at the Newark facility; and (5) staff members with unrestricted access to collections not have the ability to delete TMS records.

Management generally concurred with our findings and recommendations and has planned corrective actions to resolve the recommendations.

For additional information or a copy of the full report, contact the Office of the Inspector General at (202) 633-7050 or visit http://www.si.edu/oig.
Audit of Collections Stewardship at the Cooper-Hewitt, National Design Museum, Number A-11-02

This report presents the results of our audit of collections stewardship at the Cooper-Hewitt, National Design Museum (Cooper-Hewitt). It is one in our series of audits covering collections at the Smithsonian. The Office of the Inspector General (OIG) initiated this audit to examine collections management, which is essential for safeguarding the collections for public and scholarly use and for reducing the risk of loss or theft. Earlier audits covered the National Museum of Natural History (NMNH) (A-05-06, September 29, 2006), the National Air and Space Museum (NASM) (A-09-04, March 17, 2010), and the National Museum of American History (NMAH) (A-10-03-1, February 8, 2011).

Collections are at the core of the Smithsonian. The Smithsonian Strategic Plan for fiscal years 2010-2015 states:

The collections are fundamental to our work and to that of countless scholars and many federal agencies; it is our responsibility to preserve them for future generations. To ensure they remain available, we will improve collections storage and management, substantially expand access to collections through digital technologies, and build public/private partnerships that strategically enhance collections care.

Based on the common patterns in our prior reports addressing collections care, security, and management, the Institution’s Board of Regents has expressed concern that the Smithsonian has not put enough focus on protecting its collections. As a result, the Secretary tasked the Deputy Under Secretary for Collections and Interdisciplinary Support to catalogue the collections challenges facing the museums along with the remedial actions undertaken to date and planned. The Deputy Secretary will report to the Board of Regents on the results at future meetings of the Audit and Review Committee.
Our objectives in the audit were to assess whether (1) physical security is adequate to safeguard the collections, (2) inventory controls are in place and working adequately, and (3) controls over the preservation of collections are adequate. We describe in detail our audit scope and methodology in Appendix A.

RESULTS IN BRIEF

Our prior audit reports on NMNH, NASM, and NMAH found serious weaknesses in inventory and security controls. Although we identified areas where Cooper-Hewitt could make some improvements, we found that Cooper-Hewitt’s controls over inventory, physical security, and preservation were generally adequate. We also identified some opportunities to strengthen the management of inventory and security. Specifically, the Museum needs to develop a plan to ensure records are updated and needs to ensure proper segregation of duties within its inventory system. We also found that the Office of Protection Services (OPS) needs to provide more oversight of operations at the Newark facility.

Cooper-Hewitt invested considerable time and resources developing inventory controls by conducting a comprehensive inventory of its entire collection; however, electronic records are incomplete and require reconciliation. If museum personnel found anomalies during their collections inventory, such as objects on the shelves without corresponding collections records, or records without corresponding objects, they assigned objects a temporary tracking number to continue the inventory with the intent to go back and reconcile the information in the future. Although reconciliation cannot be accomplished until the collections move to permanent storage, Cooper-Hewitt needs to develop a plan to ensure the information is updated in a timely manner.

Although overall physical security is adequate to safeguard the collections, some aspects of security need strengthening. Our tests of security devices found that they were generally adequate. We also observed that Cooper-Hewitt is upgrading security as part of its redesign of the existing buildings in New York. Further, OPS provided input and oversight of the security plans for the Mansion and Miller-Fox townhouses. However, at the Newark facility, access control to the combined collections storage area and OPS oversight of Newark operations need strengthening. In addition, security reporting could be improved. Finally, Cooper-Hewitt needs to further segregate the duties of the collections database administrator.

We concluded that Cooper-Hewitt’s controls over preservation of its collections were adequate. The Museum has conducted surveys on the condition of the collections, obtained new shelving and storage for the collections, created a storage system, closely monitored environmental conditions, and developed detailed disaster plans. Although it cannot address all collections preservation issues, overall the Museum is making good use of limited resources.

We recommended that Cooper-Hewitt strengthen physical controls over access at the Cooper-Hewitt’s Newark facility by controlling access to combined collections storage areas and ensuring that OPS obtains and reviews security reports and oversees key management. Further, we recommended that Cooper-Hewitt prevent staff members from having unrestricted access to both collection objects and collections records. We also recommended that it improve inventory controls for its collections by reconciling
electronic collections records to its accession and object records, and by identifying and updating incomplete collections records. Given the Museum’s adequate controls over collections preservation, we did not make recommendations in this area.

BACKGROUND

The Cooper-Hewitt, National Design Museum

The Museum was founded in 1897 by Amy, Eleanor, and Sarah Hewitt, granddaughters of industrialist Peter Cooper, as part of The Cooper Union for the Advancement of Science and Art. Cooper-Hewitt has operated as a branch of the Smithsonian since 1967. In 1976 Cooper-Hewitt opened in the former home (mansion) of industrial magnate Andrew Carnegie on Fifth Avenue in New York City.

Cooper-Hewitt is devoted to historic and contemporary design. The Museum presents perspectives on the impact of design on daily life through active educational and curatorial programming. The Museum collections include approximately 226,817 design objects\(^1\) and a design library. Its exhibitions, educational programs, and on-site master’s program explore the process of design, both historic and contemporary.

The Museum is currently redesigning the mansion’s interior to increase exhibition space. This reconstruction project closed the mansion for approximately two years, beginning in mid-2011. The mansion’s campus also includes two historic townhouses, the Miller and Fox buildings (Miller-Fox). Cooper-Hewitt plans to reopen Miller-Fox after completion of a major reconstruction in late 2011 with a new library facility to include lecture rooms as well as curatorial and administrative offices.

The Museum has also leased long-term storage space in Newark, New Jersey to house the bulk of its permanent collection as well as provide the Museum with additional registrar workspace, collections study, photography, and conservation lab space. At the time of our audit, most of Cooper-Hewitt’s collections were placed in temporary storage awaiting the completion of renovations to the permanent storage space. In preparation for the renovations and the move of the collections to new storage space, Cooper-Hewitt recognized the need for a comprehensive inventory of their entire collection.

At Cooper-Hewitt, care and accountability for the collections is the responsibility of the Curatorial Director and the Director’s staff. Among other duties, the Director is responsible for overseeing the Registrar’s Office, the Conservation Office, and four Curatorial Departments: Drawings, Prints, and Graphic Design; Product Design and Decorative Arts; Textiles; and Wallcoverings. The Registrar’s Office is responsible for the legal documentation of accessioned objects and the movement of loaned objects (both incoming and outgoing loans) and has access to all collections. The Registrar staff maintains a degree of independence from the curatorial staff, since they set the collections management policy and ensure that it is being followed. The Conservation Office is responsible for the preservation of all collections, which includes determining the

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\(^1\) This number does not include those objects managed by the Cooper-Hewitt Library, as they were excluded from our scope.
appropriate standards for the collections' storage environment, housing, material and techniques. Curators are responsible for the physical care of collections, which involves balancing collections care with access to the collections.

Cooper-Hewitt’s Collecting Divisions

The collections encompass the holdings of the Museum’s four curatorial departments: Drawings, Print, and Graphic Design; Product Design and Decorative Arts; Textiles; and Wallcoverings.

Drawings, Prints, and Graphic Design (DPGD)

The Drawings, Prints, and Graphic Design collection is home to approximately 160,000 works of art dating from the Renaissance to the present related to the history of European and American art and design. The collection includes designs for architecture, decorative arts, gardens, interiors, ornament, jewelry, theater, textiles, graphic and industrial design, as well as the fine arts.

Product Design and Decorative Arts (PDDA)

Cooper-Hewitt’s department of Product Design and Decorative Arts is home to approximately 40,000 objects dating from antiquity to the 21st century, which form a resource for decorative art and design. International in scope, the collection contains a diverse assortment of objects, reflecting a vast range of historical styles and design movements. Categories of objects within the collections include Ceramics, Furniture, Metalwork, Lighting, Glass, Jewelry, Architectural Elements, and Industrial Design.
Textiles

The Textiles collection contains more than 30,000 pieces representing a wide range of woven and non-woven techniques. Extending from ancient to contemporary examples, the earliest pieces in the collection are from the Han Dynasty China (206 BC-AD 221).

Wallcoverings

Cooper-Hewitt’s Wallcoverings department contains a large and varied collection of wallpaper, with more than 10,000 pieces from the 17th century through today and represents many countries of origin. The collection includes individual wallpaper pieces, rolls, sample books, advertisements, and printing tools that have been collected for their historic associations, as design inspiration, or as examples of printed material.

Cooper-Hewitt Security

OPS is responsible for the security of staff, visitors, and collections Institution-wide. OPS is a branch of the Office of Facilities Engineering and Operations (OFEO). OPS provides protection and security services at Smithsonian facilities on and near the National Mall in Washington, D.C., New York City, and Panama. Each building or compound has a Security Manager who is in charge of overseeing security for that location. The Security Manager reports to the Area Security Manager, who is responsible for overseeing multiple facilities in a geographic area. The Technical Security Division (TSD) of OPS provides technical assistance and advisory services to SI bureaus, offices, and facilities, as well as maintains and repairs all technical security equipment, such as door access-card readers, cameras, and motion detectors, throughout the Institution. TSD also provides security design and construction support.

Smithsonian Collections Management Policy and Implementation Manual

Smithsonian Directive (SD) 600, Collection Management Policy, states that effective collections management requires a continuous inventory system to support decisions regarding collections use, growth, storage, and security. Full inventory control requires creating and maintaining reliable information about the identification, location, and accessibility of collection items. Inventory is a critical component of ongoing collections documentation.
The SD 600 Implementation Manual requires that a collecting unit accurately and comprehensively document its collections. It also requires collecting units to create and maintain accurate and current inventory records that will identify, locate, and give an account of each object's condition to ensure maximum accessibility consistent with its security. The manual states that collecting units must clearly establish lines of authority and responsibility for all collections activities and must emphasize the maintenance of complete, written records regarding all collections-related decisions and activities.

Accordingly, SD 600 and the Implementation Manual require each unit to implement a continuous inventory system for (1) conducting, supervising, and approving cyclical inventories and reconciliation of collection records; (2) implementing a written cyclical inventory plan that is reviewed by all individuals who will conduct the inventory and approved by the Museum director; and (3) ensuring separation of duties and implementation of other internal controls to prevent the unauthorized removal of collection objects.

Cooper-Hewitt Collections Management Policy (CMP)

According to Cooper-Hewitt's CMP, the Registrar's Office is responsible for maintaining and making available up-to-date records that document the history and all activities affecting objects in Cooper-Hewitt's custody, along with their status. The Registrar's Office is responsible for creating and maintaining records for each object and maintaining incoming and outgoing loan records; the appropriate curatorial department is responsible for cataloguing each object and maintaining objects research files; and the conservation department is responsible for keeping accurate records of condition and treatment. All records must be created in an accurate, complete, and timely manner and updated regularly.

Cooper-Hewitt Collections Management Software – The Museum System (TMS)

Cooper-Hewitt has implemented The Museum System (TMS) as their collections information system. The Museum is one of the many Smithsonian art museums that have implemented TMS and is on the Art Collections Information System committee (ArtCIS). The ArtCIS facilitates collaboration between units and encourages the sharing of information, best practices and solutions to problems, and standardization of procedures and terminology.

RESULTS OF AUDIT

We found that Cooper-Hewitt's controls over inventory, physical security, and preservation were generally adequate. We did identify some opportunities to strengthen the management of inventory and security. Specifically, the Museum needs to develop a plan to ensure records are updated and effect proper segregation of duties within its inventory system. We also found that OPS needs to provide more oversight of operations at the Newark facility.
Inventory Controls are Adequate but Could be Improved

Background

Beginning in 2007, in anticipation of closing for its redesign, Cooper-Hewitt began a 100 percent inventory of its collections. Museum staff went shelf by shelf and verified each object’s information in TMS. They found some objects that were neither properly labeled nor adequately documented in TMS. In these instances, Museum staff assigned a temporary tracking number to the object so they could complete the inventory in time for the move, with the intent to go back at a later date to research the objects further and reconcile the information. Reconciling the information in TMS requires the staff to identify accession documentation associated with the object and then verify whether the Museum had assigned the object an accession number. To date, the Museum has inventoried PDDA, Textiles, and Wallcoverings and is currently inventorying DPGD.

As a part of the inventory, Cooper-Hewitt documented storage, condition, and conservation issues of the collections. With the move of the collections imminent, the Museum packed the objects to prepare them for transport to temporary storage. Once objects had been inventoried, the boxes were marked to indicate key information, such as whether the inventory was completed, the pertinent department, and where they were going to be stored.

Testing Results

To test the accuracy of the inventory records and to confirm whether objects could be located, we selected a sample of objects from each of the four curatorial departments. In total, we sampled 369 objects at the Museum and at offsite storage locations. Our results, summarized in Appendix C, show that we were able to locate 352, or 95 percent, of the sample. We could not locate 16, or 4 percent, of the sample. The objects we could not locate were not considered priority collection objects; they consisted of various types of prints such as drawings, a greeting card, and a lithograph. We found that one object had been deaccessioned from the Museum’s collection, and Museum personnel updated the inventory records based on our audit work.

In addition to our sample from all four departments, we also attempted to review 100% of the objects that the Museum had identified as priority - those objects of the greatest significance to the collection in terms of their importance and uniqueness to the history of design, cultural significance, and the Smithsonian’s mission. The Museum’s DPGD priority objects include the drawing Sand Barges Moored at the Quay by Vincent Van Gogh and a rare drawing by Michelangelo. The Textiles department’s priority objects
include a bonnet and mittens dating back to the year 300 BC. PDDA priority objects include vases and a lamp by Louis Comfort Tiffany as well as many silver-gilt pieces. The Wallcoverings priority objects include various 19th century French floral compositions and scenic wallpapers, such as Views of Italy and El Dorado. Since many of these objects were packed for temporary storage, we could not view them all. We verified all of the accessible priority objects except for one piece of an object that was identified as missing by Cooper-Hewitt prior to our audit. Cooper-Hewitt staff believes this was a recordkeeping error but we could not confirm their belief.

Inventory Records are Incomplete

Despite the Museum having conducted a comprehensive inventory of its collections, TMS records are incomplete and require reconciliation.

We found that in many cases a portion of TMS collection records did not contain identifying information such as description. In our analysis of the 226,817 records (Appendix C, table 2), we found that approximately 73 percent, or 166,648 records, had blank “Description” fields. Of these records 75 percent were for objects in the Drawings, Prints, and Graphic Design Division and 13 percent were from Product Design and Decorative Arts. Ten percent were from Textiles and 2 percent were from Wallcoverings.

Cooper-Hewitt staff assigned a temporary tracking number to many objects they discovered during the inventory but that they could not verify in TMS at the time. The Museum assigned 11,315 objects temporary tracking numbers based on the most recent inventory (Appendix C, table 3). Once the move of the collections is complete, staff will need to research accession records and reconcile the objects’ information in TMS.

Performing reconciliations of the TMS data, accession records, and the object is part of the inventory process and an essential step for ensuring the accuracy of all the Museum’s collections records. Cooper-Hewitt’s records are incomplete because the Museum has not converted all of its paper records into TMS, and reconciliation of the inventory cannot be performed until the move of its collections to permanent storage. However, Cooper-Hewitt staff expressed concern that because they have limited resources, they would not be able to properly reconcile the inventory data after the collection was moved to permanent storage. The Museum’s lack of a dedicated Collections Manager in three of the four collecting departments compounds this issue.

Incomplete TMS collections data leaves collections objects vulnerable to loss or theft, diminishes accountability, and reduces the scholarly value of the objects. It also adversely affects Cooper-Hewitt’s ability to fulfill the mission of the Smithsonian by not having the objects accessible for exhibit, research, and public programming purposes.
Incomplete recordkeeping creates the appearance that objects are missing when in fact the objects may have actually been deaccessioned or assigned a temporary tracking number. The temporary tracking numbers create the potential for duplicate records as does the assignment of accession numbers to missing objects. Such practices also reduce the usefulness of records to inventory the collections and increase the risk that objects could be lost or stolen without detection.

At the time of our audit, Cooper-Hewitt categorized 10,428, or 5 percent, of its objects as missing in TMS. Management believes that a portion of these missing objects are archives and study materials, not accessioned objects. Cooper-Hewitt staff believes that the 11,315 objects assigned temporary tracking numbers are in fact the objects labeled as missing in the system. We could not verify their assertion without Cooper-Hewitt performing a reconciliation.

Our inventory testing produced similar results (Appendix C, table 1); out of the 369 objects we tested, 16, or 4 percent, of the objects could not be found. We believe this rate is reasonable based on our audit sample. However, we believe that Cooper-Hewitt should strive for 100 percent accountability for its collections. Of the 16 objects we could not locate during the testing, Cooper-Hewitt provided additional information indicating that the objects may not actually be missing, but that instead their recordkeeping was inaccurate. The recordkeeping errors may be the result of a lack of reconciliation from past inventories, the conversion of the collections data to TMS in 1998, or temporary tracking numbers.

**Recommendations:**

We recommend that the Director of Cooper-Hewitt, develop a plan to:

1. Reconcile the TMS, accession, and object records.
2. Identify incomplete records in TMS and update them.

**Physical Security to Safeguard the Collections is Adequate but Could be Improved**

**Background**

Security of the collections is the responsibility of both the Museum and OPS. OPS is organized into separate divisions. The Operations Division is generally responsible for day-to-day operations and emergency situations. The TSD provides security design and construction support for all Smithsonian facilities.

**Newark**

Since the New York facilities were in transition, we focused our testing of security devices at the Newark facility. Based on our testing, we found the physical security at the Newark facility was generally adequate to safeguard the collections; however, we found weaknesses in the design of some security procedures. Collections were not at risk in the space because, at the time of our testing, they had not been moved into the permanent storage space. The weaknesses we identified involved two controls in particular: access within the combined storage area, and oversight by OPS' Operations Division. We also have
concerns regarding the reporting of security activity in Newark. Some of the security devices failed our testing. OPS TSD is actively addressing those devices.

**Combined Collections Storage Space**

Although the Museum has planned well for its overall physical security to safeguard collections, at the time of our audit, some internal controls were not planned for within the Newark collections storage space. The current plans are to co-locate approximately 70 percent of the collections from all four departments in one space. Four separate groups of people representing each collecting department oversee the collections. Based on the configuration of the space, once a person enters the space, he or she has immediate access to all collections areas regardless of need.

The SD 600 Collections Management Policy requires each collecting unit to establish authority and assign responsibility to control, monitor, document, and provide collections and collections information access; incorporate applicable guidelines for access set forth in the SD 600 Implementation Manual; and establish policies, criteria, and procedures for permitting responsible access to physical collections and collections information. The SD 600 Collections Management Implementation Manual further states that stewardship involves policy and planning documents that address the needs of existing collections and future collecting activities. This manual also requires collecting units to secure all collections in controlled areas where access is monitored and documented.

The Draft Smithsonian’s Collection Space Security Standards state that access to collections space should be limited to the minimum number of staff whose official duties require frequent and regular access. Collections management staff should consider separating collections spaces by department or access requirements. These standards optimize the available space to reduce unnecessary access to the space.

Prior to the move to Newark, the Museum stored each of its collections in separate storage spaces that limited access to only those personnel assigned to work on the collections. That the new collection storage space at Newark consists of one space for all four departmental collections introduces a new risk: individuals granted access to this space also have access to collections beyond their official duties. At the time of our audit, Museum management had not planned how to mitigate the risk posed by this arrangement.

The lack of access controls within Cooper-Hewitt’s combined collections storage in Newark needs to be addressed before the collection is moved into the space to lower the risk of unauthorized access, which creates the opportunity for undetected loss, damage, or theft of objects.

**OPS - Operational Oversight at Newark**

Although OPS Operations Division was involved in the planning of security at Newark, we identified potential weaknesses in operational oversight at that facility. We are aware that the Museum is still developing its policies and procedures for operations there, but believe that the OPS Operations Division could provide valuable input into this process.
According to the OPS Staff Security Handbook, OPS determines security policy and standards and provides security planning and protection for facilities and areas under their control, including Smithsonian owned and leased facilities in the New York City metropolitan area.

OPS’ Staff Security Handbook says that for those facilities where OPS does not have direct security control, OPS provides:

- Risk assessments and recommendations for risk-mitigating measures
- Security-related operational and technical guidance through special consultation or facility planning projects

We noted that under the lease for the facilities and the draft security procedures at the Newark facility, the landlord will provide monthly security reports to the Museum. These reports will contain valuable information regarding collection access and alarm activity and should be closely monitored by OPS Operations staff. During our audit, OPS Operations staff could not explain to us how they were going to review and analyze these reports.

Generally, key management activities such as issuance, storage, retrieval, and control of keys are responsibilities of OPS. However, Cooper-Hewitt assigned key management solely to the Registrar staff at the Newark facility. Since approximately 70 percent of Cooper-Hewitt’s collections will be stored in the Newark facility, we believe OPS should have a role in the oversight of key management at Newark. We have noted in prior audits of other Smithsonian museums that poor coordination between OPS and museum staff resulted in mismanagement of keys, diminishing collections security.

Testing of devices - Newark

Smithsonian security design criteria outline the standards for specific security devices based on the purpose and use of the space. For leased facilities, OPS should determine the appropriate level of security for each space through consultation with the Museum. Security levels should reflect the client’s mission, tenant mix, size of space requirements, number of employees, and use of space. Based on an assessment of the space, OPS can provide the Museum with an appropriate security design.

TSD designed the security device layout at Newark, which consists of 96 devices to mitigate the collection’s security risk. With the assistance of OPS, we attempted to test all 96 security devices in Newark; however, we found three inaccessible. Of those devices that we could access, 87 passed and 6 glass break sensors failed testing. Since our testing, OPS reviewed the product information on the glass break sensors, enabling them to properly test the devices. They found that all the sensors were operational.

Mansion and Miller-Fox

The Museum’s Manhattan facilities are in various stages of redesign and reconstruction and therefore the security layout at the Mansion and Miller-Fox townhouses will ultimately differ dramatically from the current configuration. Consequently, we chose to review OPS’ redesign of security. We found OPS’ TSD was actively involved by reviewing
and providing feedback into the design of the security layout. We reviewed security plans for compliance with OPS standards and found them to be generally adequate if implemented as planned.

**Recommendations:**

To prevent unrestricted access to collections for any personnel who gain entrance to the combined storage space in Newark, we recommend that the Director of Cooper-Hewitt:

3. Establish internal controls within the combined storage area to ensure individuals only have access to collections that are a part of their official duties.

To strengthen physical controls over access to Cooper-Hewitt's Newark facility, we recommend that the Director of OPS work with the Director of Cooper-Hewitt to:

4. Ensure that the OPS Operations Division at Cooper-Hewitt obtains and reviews the security reports and oversees management of keys at the Newark facility.

**Conflicting Duties**

A traditional control technique in inventory management is to separate the responsibilities for managing objects and maintaining object records. Separating these duties minimizes the risk of records being adjusted to mask theft or loss. SD 600 states that each collecting unit must ensure adequate separation of duties and other internal controls to minimize the possible unauthorized removal of collection items and corresponding records. The SD 600 Implementation Manual further explains that there may be different levels of separation based on the value of the collections; while high-value collections may need full separation of duties, other collections may only need an audit trail to track changes. It also states that where separation of duties is not possible, other compensating controls should be implemented to minimize any risks.

Cooper-Hewitt is not ensuring that there is adequate separation of duties between employees with access to collections and access to object records. We identified five employees with physical access to collection storage areas who also had TMS privileges that allowed them to alter and delete object records. During the course of the audit, the Museum restricted the TMS privileges of four of the five individuals. However, one member of the Registrar’s Office still has unrestricted access to collections.

This condition occurred because Museum management assigned System Administrator responsibilities to the registrar staff. The Registrar Office’s responsibilities require that they have access to collection records. We believe that since recordkeeping is the registrars’ primary function, it is a common practice to allow a registrar to perform the function of System Administrator. However, compensating controls need to be in place to limit the person’s access to objects. Without proper separation of duties it would be possible for an employee to improperly remove an object and then mask the theft by altering or deleting the object’s audit trail.
Recommendation

To prevent staff from having unrestricted access to both objects and object records, we recommend that the Director, Cooper-Hewitt:

5. Ensure that Cooper-Hewitt staff members with unrestricted access to collections not have the ability to delete TMS records.

Controls over the Preservation of Collections are Adequate

Background

The SD 600 Collection Management Policy states that preservation is the protection and stabilization of collections, as well as their associated information, through a coordinated set of activities aimed at minimizing chemical, physical, and biological deterioration and damage, and preventing loss of intellectual, aesthetic, and monetary value. It also states that the Smithsonian shall provide the necessary preservation, care, protection, and security for all collections acquired, borrowed, and in the custody of the Institution, including their associated information.

In reviewing preservation at Cooper-Hewitt, we relied on A Public Trust at Risk: The Heritage Health Index Report on the State of America’s Collections, published in 2005. This comprehensive survey conducted on the condition and preservation needs of all United States collections held in public trust consisted of responses from 3,239 museums and institutions nationwide. Cooper-Hewitt participated in this survey. The Heritage Health Index data pointed out four general, important collections stewardship needs: environmental and storage conditions, emergency planning, staffing, and funding. The Heritage Health Index states that if these needs are not addressed, collections are at higher risk for damage or loss.

We concluded that Cooper-Hewitt has designed adequate controls over the preservation of its collections. Museum staff created a packing system, obtained new shelving and storage for the collections, sought out funding opportunities, conducted surveys on the condition of their collections, closely monitored environmental conditions, and developed detailed disaster plans. All these efforts exemplify good controls. Although the Museum cannot address all collections preservation issues, overall the Museum is making good use of its limited resources.

Cooper-Hewitt Preservation Efforts

Environmental Controls - At Cooper-Hewitt the conservation staff monitors temperature and humidity levels to ensure levels are within an acceptable range to preserve collections. Because deterioration of objects results from adverse environmental conditions, monitoring and controlling the environment are key factors to ensure the long term preservation of Museum property.
**Storage** - Good collection storage is a major component of a preventive conservation program to preserve the museum collections. A well planned and organized storage space reduces the risk of damage to the objects and improves access to collections. Cooper-Hewitt has obtained new shelving and prepared a detailed storage plan for objects in the Newark space.

Shelving - Cooper-Hewitt installed compact shelving in the new storage facility in New Jersey to maximize storage space.

**Compact Shelving, Newark**

**Compact Shelving, Newark**

**Storage system** - Conservation staff designed a storage system that allows access to the objects by handling the casing rather than the object itself and thus reduces the risk of damage to the object. According to the Conservation management, the storage system for parts of the collection has been designed so that the Museum can use students and interns to assist in creating storage supports and containers. We believe this is a cost effective approach that allows conservation staff to focus on other areas while providing valuable experience to novice staff.

**Storage example**

**Emergency Plan** - Cooper-Hewitt has developed a written, comprehensive disaster plan for each of its facilities that addresses: (1) notification, a list of staff who needs to be notified in case of any type of emergency; (2) recovery, a list of emergency supplies and equipment; (3) salvage/post recovery treatment by material; and (4) steps to be taken in case of fire or water damage.

**Collections Preservation Surveys** - The Museum is surveying their collections to systematically examine, document, and evaluate their preservation and condition needs. These surveys form the basis for the Museum's collection care plan. At the time of our audit, the status of the Museum surveys was as follows: Textiles is completed; DPGD is ongoing; PDDA has just received funding for part of the collection; Wallcoverings is pending. These surveys provide valuable data on the state and condition of the collections allowing the Museum to identify their greatest needs.
Funding - We found that the conservation staff was proactive and resourceful when looking for ways to strengthen collections conservation. For example, according to Cooper-Hewitt management, from FY 2009 to 2011, Cooper-Hewitt received a total of approximately $3.8 million for conservation: $1.2 million in federal and $2.6 million in private funds. The federal funds included approximately $760,000 for three years' salaries and benefits for three conservator positions, $404,000 in Federal Collections Care and Preservation funds, and $37,700 in Research Equipment Pool funds. Cooper-Hewitt staff raised most of the private funds for this period through a major capital campaign to support the Museum’s renovations and new facility as well as from a Smithsonian Grand Challenges grant. Conservation management told us that they were able to raise these funds by looking for funding opportunities tied to planned exhibits or by applying for grants to address projects of highest priority. They also said that they carefully focused and prioritized the use of these funds on the collections with the greatest need, which they identified using their collections surveys.

MANAGEMENT RESPONSE

The Directors of both the Cooper-Hewitt, National Design Museum and OPS provided formal written comments to our August 10, 2011 draft report. The Directors generally concurred with most of our audit recommendations. The Director of Cooper-Hewitt stressed that, at the time of the audit, the Museum was in the middle of renovations and that three of the four collections were in temporary storage and will be moved to permanent storage space once renovations are completed. The OPS Director reiterated that OPS policies and procedures were still in the draft stages for the Newark facility.

Management disagreed with our assertion that incomplete TMS collections data leaves collection objects vulnerable to loss or theft, diminishes accountability, and reduces the scholarly value of the objects. Although they acknowledge that TMS records are incomplete and need to be reconciled, Management stated they have paper records for all objects that are readily accessible.

Of the 16 objects we could not find, Cooper-Hewitt believes that it is possible that 13 of these objects may be located during the course of the inventory of the DPGD collection. They noted that the rate of found objects was within the acceptable range of 4 percent margin of error in the sample and will strive for 100 percent accountability of their objects.

Management pointed out that our conclusion regarding the time it would take for them to update records in TMS and reconcile the information was a misunderstanding of two different processes. We initially stated that Curators were responsible for reconciling the data in TMS. Registrars reconcile the data in TMS and Curators catalog objects. They also clarified that although there are four curatorial departments, they have 8 curators on staff whose performance plans require minimum cataloguing goals. Taking this into account, curators are required to update 1,440 object records annually. Management also highlighted many examples of curators’ other digitization and cataloguing activities within the past 5 years, bringing their average to about 2,000 objects per year.

Management agreed with our statements that the lack of Collections Managers negatively impacts the rate at which they can update collection records.
Below, we summarize their comments to our recommendations and then offer our responses to those comments.

**Inventory Controls Are Adequate but Could be Improved**

**Recommendation 1.** Management provided a plan outlining what needs to be done to perform a reconciliation of their records. Depending on staffing and funding the plan will be complete between 18 months and 3 years.

**Recommendation 2.** Management stated that there has been a plan in place and implemented for a number years and that updating TMS records is an ongoing activity. They provided a description of their plan. Management estimated that 50 percent of the objects will be digitized by the end of 2013, 75 percent by the end of 2016, and the process completed by the end of 2019.

**Physical Security to Safeguard the Collections is Adequate but Could be Improved**

**Recommendation 3.** Once objects are moved to permanent storage, Cooper-Hewitt will institute a “buddy system” for individuals accessing the combined storage space. A log book system recording objects entering and leaving the room will be implemented. The estimated target date for this process is March 2012.

**Recommendation 4.** Concur. OPS operations responsibilities pertaining to security reporting and key management at the Newark facility will be finalized and details published in Operational Manual of the Newark facility. They estimated they will complete the operations manual by September 30, 2011.

**Recommendation 5.** Management indicated that due to limited staffing they could not limit the TMS administrator’s access to the collection until after they have completed their move of objects to permanent storage. Their estimated target date for completion is March 2012.

We include the full text of management’s response in Appendix B.

**OFFICE OF THE INSPECTOR GENERAL COMMENTS**

We are pleased that management generally concurs with our audit recommendations. We acknowledge that during our audit the Museum was undergoing an inventory and that the collections were in transition due to renovations at the storage facility in Newark.

Below, we address Cooper-Hewitt’s comments regarding specific statements in the report and clarify our expectations in addressing the report recommendations.

We disagree with the statement that 13 of the 16 missing objects will be located during the inventory of DPGD. At the time of the audit, DPGD staff conducted extensive research of paper and inventory records of the 13 missing objects and noted only 4 objects that may be identified in the ongoing inventory. The remaining 9 objects have either been assigned a temporary tracking number or the records were not up-to-date.
We appreciate management clarifying the duties of the Curators and Registrar staff regarding records management, specifically, reconciliation and cataloguing. We understand that reconciliation of records is the responsibility of the Registrar staff, whereas curators catalog the object information. During further discussions with Cooper-Hewitt management regarding their plans for updating TMS, they explained how they have been proactive in obtaining additional funding to supplement their staff and to capitalize on their limited resources so that they can focus on updating TMS while the Museum is closed for renovations. Based on this information, we modified the language in the report.

**Recommendation 1.** We recognize that since the collections have not been moved to the permanent storage space, Cooper-Hewitt management cannot provide a firm timeline for when they will complete records reconciliation. We do request that Cooper-Hewitt provide a more detailed plan with definitive dates and milestones once the collection is moved to the permanent storage space. We will assign a target date of December 15, 2011 for the updated plan.

**Recommendation 2.** We appreciate Cooper-Hewitt providing their plan to update TMS records; however, the information provided appears to establish goals towards updating records rather than a detailed plan. We request that Cooper-Hewitt management provide a detailed plan specifically addressing what information needs to be updated, who is responsible, and target dates for completion. We will assign a target date of December 15, 2011 for an updated plan.

**Recommendation 3.** We consider the proposed plan for internal controls in the permanent storage space adequate to meet our audit recommendations. However, we ask that Cooper-Hewitt management periodically review the log book to verify object locations and retain the log book at least 5 years for recordkeeping purposes. We consider this recommendation closed.

**Recommendation 4.** We believe OPS’ plan to incorporate operational responsibilities of OPS staff into the Operational Manual of the Newark facility responds to our audit recommendations. We agree with the target date of September 30, 2011 for completion of the recommendation.

**Recommendation 5.** We understand that Cooper-Hewitt has limited staffing resources and that all staff are needed to assist in the move of the collections to permanent storage. We agree with Cooper-Hewitt’s plan to restrict access to the TMS Administrator once the move is complete. We will assign a target date of March 30, 2012 for the TMS Administrator’s restrictions to the collection.

Cooper-Hewitt provided additional editorial comments to various sections of the report, which we have addressed either in the body of the report or in our response above.

We appreciate the cooperation that Cooper-Hewitt staff provided during the course of this audit. We recognize that the audit took place during a transition for the Museum, and that the audit represented a challenge in the midst of Cooper-Hewitt preparing for a major exhibition, undergoing an inventory, preparing to shut-down for renovations, and moving their collections from temporary to permanent storage.
APPENDIX A. SCOPE AND METHODOLOGY

The objectives of this audit were to assess whether physical security was adequate to safeguard the collections, inventory controls were in place and working adequately, and controls over the preservation of collections were adequate.

We reviewed previous audit reports of security, inventory, and preservation control measures safeguarding the Smithsonian’s collections. We also reviewed Smithsonian directives and guidance related to collections management; OPS handbooks and guidance related to security of collections; and reviewed a previous survey that documented and evaluated the preservation needs and conditions of the Museum’s collections. Further, we examined external standards, practices, and studies that included the Heritage Index Report and the American Association of Museum’s Characteristics of Excellence.

Inventory Controls

We evaluated the collections management controls and procedures at the Museum and performed tests of its records to identify procedural strengths and weaknesses. We reviewed the adequacy of controls over the collections inventory system. We interviewed personnel in Cooper-Hewitt’s various curatorial departments: Drawings, Prints, and Graphic Design; Product Design and Decorative Arts; Textiles; Wallcoverings; and the Registrar’s Office.

We identified approximately 226,817 objects dedicated to historic and contemporary design. We scoped out of our audit a review of the Cooper-Hewitt library as well as objects on loan to other institutions.

Using the TMS collections database, we conducted a spot check of objects based on a statistical sample of the records from each division. We selected a random sample of 369 objects using a 95 percent confidence level and an expected error and margin of error of 4 percent and 2 percent, respectively. We also conducted a 100 percent review of accessible priority objects identified for each collecting division. To assess the completeness of the TMS database, we judgmentally selected 10 objects from each division to verify that records existed in TMS. We also performed analytical reviews of the data in TMS to assess record completeness. The results of the sampling could not be projected across the population so therefore we did not project our results.

Physical Security

Cooper-Hewitt’s facilities are in various stages of redesign and reconstruction. The security footprint at the Mansion and Miller-Fox townhouses will dramatically differ from the current configuration. Consequently, we chose to review OPS’ input and oversight into the redesign of security. We interviewed OPS staff and reviewed physical security policies and procedures. Since the New York facilities were in transition, we focused our testing on security at the Newark facility.

To assess physical security controls at Cooper-Hewitt, we toured the collections storage areas of the Museum’s New Jersey storage facilities. We inspected and tested security devices to determine whether alarms were working properly. We were accompanied by
Cooper-Hewitt, OPS, and representatives from the landlord and security monitoring company. We also reviewed the security plans and layouts for the Mansion and the Miller-Fox townhouses.

Preservation

Cooper-Hewitt is currently undergoing major renovations that require the collections to be placed in temporary storage. Once renovation is complete, all objects will be moved and re-housed in permanent storage locations. Because the collection is in temporary storage, we could not assess the permanent storage. Nevertheless, we assessed the Museum’s preservation efforts.

We reviewed Cooper-Hewitt guidance and practices pertaining to collections preservation. We held discussions with the Cooper-Hewitt conservation department and reviewed documentation to determine whether the Museum has adequate controls over preservation of its collections.

We conducted this performance audit in New York, New Jersey, and Washington, D.C., from October 2010 through June 2011, 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 we obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
APPENDIX B. CHNDM MANAGEMENT'S RESPONSE

Date: August 24, 2011

To: A. Sprightley Ryan, Inspector General

Cc: Richard Kurin, Under Secretary for History, Art, and Culture
    Bruce Kendall, Director, Office of Facilities, Engineering, and Operations
    William Lynch, Director, Office of Protection Services
    Alison McNally, Under Secretary for Finance and Administration
    Scott Miller, Under Secretary for Collections and Interdisciplinary Support
    William G. Tompkins, National Collections Coordinator, National Collections Program
    Caroline Baumann, Associate Director, Cooper-Hewitt, National Design Museum

From: Bill Moggridge, Director

Subject: Management Response to 2011 Audit of Collections Stewardship at Cooper-Hewitt, National Design Museum, Number A-11-02

Attachment: See attached Audit draft with specific comments

We very much want to thank the Office of the Inspector General's (IG) staff for auditing our Collections Stewardship and for their careful analysis and recommendations for ways to improve our procedures. We also appreciate the opportunity to review and comment on the enclosed draft report. We concur with most of the findings and have responded below to the specific recommendations.

Regarding RESULTS IN BRIEF

- While we concur with most of your recommendations, it is important to note that at the time of this audit, CHNDM was in the middle of a major renovation, with the collections separated in two different locations. Three of the four collections were in temporary storage in Newark, New Jersey and will be moved this fall to a permanent storage space that was being renovated during the auditing process.

- CHNDM is close to completing a comprehensive inventory of its collection, although some paper (non-digitized) collection records have not yet been transferred to TMS and others require reconciliation, which cannot happen until the collection is moved to permanent storage. While some portion of the Museum's object records are not yet digitized in TMS, it is important to note that the paper records for all objects are readily accessible. We therefore, do not agree that "incomplete TMS collections data leaves collections objects vulnerable to loss or theft, diminishes accountability, and reduces the scholarly value of the objects."
APPENDIX B. CHNDM MANAGEMENT'S RESPONSE

- Please note that of the 16 objects that could not be found, 13 of the objects were in the Drawings, Prints, and Graphic Design (DPGD) department, whose inventory is still in progress and was not completed at the time of the audit. This rate of found objects is within the acceptable 4% margin of error in the random sample. It is quite feasible that these 13 objects will be located by the end of the DPGD inventory. The Museum will certainly strive for 100% accountability and will aim to improve upon the 4% of objects that could not be found in the Auditor's random sample.

- The one area where we disagree with the Auditor’s conclusion is on page 9, third paragraph. We think this is due to a misunderstanding of processes and therefore a conflation of two very different functions – object reconciliation (discrepancies), which is the responsibility of the Registrar and object cataloguing, which is a curatorial responsibility. We would like to correct the calculation made in the same paragraph: There are four curatorial departments, but there are 8 curators whose performance plans incorporate monthly minimum cataloguing goals. This means that 1,440 objects would be updated annually. This figure does not include other digitization and cataloguing projects, such as collection exhibitions, collection loans, and special grants, which have been obtained by Curatorial Management. For example, over 10,000 TMS records were updated from 2006-2011, the equivalent of 2,000/year. The Museum has been proactive in enhancing and updating TMS records both through specific SI and non-SI funding and through operational priorities.

- As pointed out correctly in the Collections Stewardship Audit, the rate at which Cooper-Hewitt can enter and update accession records in TMS is negatively impacted by the lack of dedicated Collections Managers in three of the four collecting departments.
APPENDIX B. CHNDM MANAGEMENT’S RESPONSE

Response to 2011 Audit of Collections Stewardship at Cooper-Hewitt, National Design Museum
August 24, 2011

Recommendation 1: Reconcile the TMS, accession, and object records

Proposed Action: Reconciliation Plan

Target date: The plan is in place as of 8/24/11 and phased target dates for completion are listed below.

Cooper-Hewitt strives for 100 percent accountability for its collections and recognizes that reconciliation is a critical and integral part of the inventory process. Because of the rate at which C-H was required to conduct the inventory in order to align with the impending museum-wide renovation plan, reconciliation could not be completed at the time of the inventory. Instead, reconciliation will occur once the Drawings Prints and Graphic Design (DPGD) inventory and the move to permanent storage in Newark are completed.

The Museum’s administration is fully committed to reconciliation, which is a time-consuming process. Cooper-Hewitt has developed the following plan to reconcile missing objects and objects with temporary tracking numbers.

1. The work required to reconcile objects in the collection marked “missing” or labeled with a tracking number will be prioritized and addressed accordingly. Numbering discrepancies will be organized into different groups, ranging from “easy” to “difficult.” “Easy” reconciliations, which are the majority of corrections that need to be made, will be addressed first, followed by more difficult issues.

2. Records that have been marked “duplicate” or “error” records will be addressed. These records need to be deleted or corrected, as there are sometimes duplicate records in the database for one object. These reconciliations can be confirmed through comparisons with the museum’s official accession ledger books.

3. The accession numbers of missing objects will be compared with the museum’s official accession ledger books. This will help identify objects that have been deaccessioned or object numbers that do not exist.

4. Many objects with tracking numbers have notes concerning associated objects. Registrar/curatorial files will be researched and reconciled with the correct accession number.

5. The remaining objects with tracking numbers will be analyzed and organized by object name and/or classification. Record shots of these objects will be taken and compared with existing departmental slides and photos as appropriate. The process will be prioritized into groups of objects, such as furniture, that are easily identifiable through photographs.

6. Basic cataloguing will be completed for all objects with temporary tracking numbers in TMS. This will improve the overall reconciliation process.
APPENDIX B. CHNDM MANAGEMENT’S RESPONSE

7. Objects that are reconciled will be approved by curatorial staff and registrars to ensure that both departments are satisfied with the conclusion. Issues that qualify as data entry errors will be approved by registrars only.

Estimated time for completion:

Dates for completion of reconciliation are contingent on the move to permanent storage in Newark; this date has not been finalized.

Steps 1-3: If the Museum is able to hire a dedicated staff person, this process is estimated to take six months. Without a dedicated staff person, it will take an estimated one and a half years.

Steps 3-6: If the Museum is able to hire a dedicated staff person, this process will take an estimated one to one and a half years. Without a dedicated staff person, it will take an estimated three years.

Recommendation 2: Identify incomplete records in TMS and update them.

Proposed Action: TMS Records Plan

Target date: The plan has been in place and implemented for a number of years and is an on-going activity. The target is to have digitized records (basic tombstone, confirmed credit line, and image) for 50% of the objects by the end of 2013, 75% by the end of 2016, and 100% by end of 2019.

1. The process of converting from paper to digital records (TMS) is lengthy, but fortunately, paper records do exist for every object in the collection. One of Cooper-Hewitt’s institutional goals is to create a digital record for each object by the time the Museum reopens (estimated late fall 2013), making a digitized record available both to staff and the public via eMuseum.

2. Identifying incomplete records in TMS and updating them is already an active part of the registrars’ and curators’ on-going responsibilities. The Registrar routinely scrubs data inconsistencies, verifies credit lines for objects, enters acquisition information from paper records, and resolves numbering issues within the database. In addition to the curators’ obligation through their work plans to catalogue a minimum of 15 works per month, they are responsible for regularly cataloguing new acquisitions, works for on-line exhibitions, collection exhibitions and loans, conservation reports, and other projects.

3. During the next two years while the Museum is closed for renovation, curators and registrars, with the assistance of student interns from the Masters Program, will devote considerable time to cataloguing, photographing, and digitizing the collection, readying it for re-opening displays, presentation didactics, publications (including a collections Handbook), and expanded Web site. The goal is to have most of the records updated by the time the Museum reopens. This is made possible in large part through funds the Museum’s Development and Curatorial departments have raised from both SI and non-SI sources.

Recommendation 3: Establish internal controls within combined storage area to ensure individuals only have access to collections that are part of their official duties.

Proposed Action: Staff Access Plans for Newark Collection Storage
APPENDIX B. CHNDM MANAGEMENT'S RESPONSE

Target date: Plan is complete as of 8/24/11 and will be instituted when the move to permanent storage is completed (estimated March, 2012.)

1. The new access plan will take effect once the collection is moved to the permanent storage space in the Newark facility.

2. When the move is complete, access to the collection storage space will be strictly controlled to prevent loss and damage.

3. Museum registrars and conservators will have access to all departments in combined storage, since this level of access is part of their official duties.

4. Museum management will institute a “buddy system” that will require that authorized staff members entering the collections space be accompanied by a second authorized object-handling staff member (registrar, conservator, curator, collections manager, or art handler.) This two-person requirement will facilitate object removal and help ensure object and staff safety while moving the compact shelving system. This procedure also will help prevent object theft and reduce the number of unnecessary trips into storage.

5. A log book system will be instituted for the storage room. The accession numbers of all objects entering or leaving the storage room must be entered in the log with the date and names of the staff members moving the objects.

Recommendation 4: Ensure that the OPS Operations Division at Cooper-Hewitt obtains and reviews the security reports and oversees management of keys at the Newark facility.

Proposed Action: Please refer to the Cooper-Hewitt Response by OPS Management which was submitted separately by William Lynch, Director, Office of Protection Services. Cooper-Hewitt has reviewed and concurs with the proposed plan.

Recommendation 5: Ensure that Cooper-Hewitt staff member with unrestricted access to the collections not have the ability to delete TMS records.

Proposed Action: Restricted Access Plan for Collections and Records

Target date: Plan is complete as of 8/24/11 and will be instituted when the move to permanent storage is completed (estimated March, 2012.)

1. Due to limited staffing, the TMS Administrator is required to be involved in the physical move of the collection into permanent storage at Newark. Once the collection move into the permanent storage space is complete, the TMS Administrator's access to collections spaces will be removed.

2. No other Cooper-Hewitt staff have the ability to delete TMS records, therefore, once the collection move has been completed, and the TMS administrator no longer has access to storage, no one on staff will have unrestricted access to both objects and object records.
We extend our thanks to the Office of the Inspector General (OIG) staff for their professionalism and helpfulness in this complicated review.

In general, we accept the findings of the audit. However, we feel it is important to provide context. As the OIG correctly indicated, the museum and the Office of Protection Services (OPS) are still developing policies and procedures for the operations of the Newark facility. Specific operational responsibilities such as security report reviewing and key management are still in the draft stages as identified in the Draft Crozier Fine Arts, Operational Manual, Cooper-Hewitt, National Design Museum (dated June 2, 2011).

**OIG Recommendation 4. Ensure that the OPS Operations Division at Cooper-Hewitt obtains and reviews the security reports and oversees management of keys at the Newark facility.**

**OPS Response:** OPS concurs with this recommendation.

Although the OPS Operations Division is involved in all aspects of security planning for new facilities, the primary security responsibility during the facility planning, design, and construction phases is led by the OPS Technical Security Division (TSD). Now that the Newark facility is moving into an operational mode, the primary security responsibility is shifting to OPS Operations. OPS Operations’ responsibility as they pertain to security report reviewing and key management will be finalized and detailed in the final version of the Crozier Fine Arts, Operational Manual, Cooper-Hewitt, National Design Museum. The OPS Operations responsibility will be consistent, as appropriate, with their responsibilities at other SI owned and leased facilities.

**Estimated completion of operations manual: September 30, 2011**
APPENDIX C. TESTING DETAILS

1. Inventory Sample Summary Table

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<tr>
<th></th>
<th>Spot Check Inventory Sample</th>
<th>Total</th>
<th>%</th>
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<tbody>
<tr>
<td></td>
<td>DPGD</td>
<td>PDDA</td>
<td>Textiles</td>
</tr>
<tr>
<td>Located</td>
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<td>Percent Not located</td>
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DPGD- Drawings, Prints, and Graphic Design; PDDA- Product Design and Decorative Arts

2. Blank Fields Universe Summary Table

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<tr>
<th></th>
<th>DPGD</th>
<th>PDDA</th>
<th>Textiles</th>
<th>Wallcoverings</th>
<th>Total</th>
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<tbody>
<tr>
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<td>% of Total DPGD Collection</td>
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<td>% of Total PDDA Collection</td>
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* Subsequent discussions with Cooper-Hewitt revealed that Museum staff is not required to use the Title field

3. Cooper-Hewitt’s Unreconciled TMS Records

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</tr>
<tr>
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<tr>
<td>Wallcoverings</td>
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</tr>
<tr>
<td>Total</td>
<td>4.9 %</td>
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</tbody>
</table>

<table>
<thead>
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<th>Division</th>
<th>Unreconciled Records in TMS (out of 226,817 records)</th>
<th># of Records with Temporary Tracking Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>DPGD</td>
<td></td>
<td>7,973</td>
</tr>
<tr>
<td>PDDA</td>
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<td>461</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>4.9 %</td>
</tr>
</tbody>
</table>
APPENDIX E.
The following individuals from the Smithsonian Office of the Inspector General contributed to this report:

Daniel Devlin, Assistant Inspector General for Audits
Brian Lowe, Supervisory Auditor
Teena Propst, Auditor-in-charge
Mark McBride, Auditor
Elsy Woodill, Auditor