

OFFICE OF THE INSPECTOR GENERAL



Collections Management: The National Museum of African American History and Culture Needs to Enhance Inventory Controls Over Its Collections



**National Museum of African American
History and Culture**

**OIG-A-20-05
June 30, 2020**

In Brief

Collections Management: The National Museum of African American History and Culture Needs to Enhance Inventory Controls Over Its Collections

Report Number OIG-A-20-05, June 30, 2020

What OIG Did

This audit assessed the extent to which the National Museum of African American History and Culture (NMAAHC) had an inventory process and plan and accurate and complete data in eight selected fields in its collection records.

To perform this audit, the Office of the Inspector General (OIG) reviewed applicable policies and other documents and interviewed Smithsonian and museum officials. OIG also sampled 93 records in NMAAHC's collection information system to determine whether they contained complete and accurate information in eight data fields that are required and needed to identify and locate collection objects.

Background

Collections form the core of any museum and are essential for exhibitions, research, and other public programs. A continuous inventory system supports decisions regarding collections use, growth, storage, and security. Prior audits have found significant problems with inventory control and the accuracy and completeness of other Smithsonian museums' collection records.

NMAAHC is the Smithsonian's newest museum. As of July 2018, NMAAHC had accumulated almost 37,000 objects since collecting its first object in 2005.

What Was Found

OIG found that NMAAHC took almost 3 years after its target completion date (the September 2016 museum opening) to establish a cyclical inventory process and plan that is required by Smithsonian policy. NMAAHC managers said that the creation of a new museum—starting with no staff, building, or collection—placed a significant workload on the small staff that was hired to start the museum. As a result, museum management did not develop an inventory process and plan, in a timely manner.

In addition, NMAAHC has not conducted any inventories in accordance with Smithsonian policy since it began establishing its collection in 2005. However, NMAAHC staff undertook activities to update the location field in the museum's electronic collection information system when objects were moved either to be placed on exhibit or to a new location in a storage facility. These activities are important, but they did not meet the Smithsonian's documentation and reporting requirements for inventories. According to the cyclical inventory plan now in place, the first cyclical inventory was to be conducted in the third quarter of 2020; however, museum officials said they will need to postpone it because of the coronavirus disease 2019 (COVID-19) pandemic.

OIG found that nearly half of the sampled records from NMAAHC's collections information system contained incomplete or inaccurate data in NMAAHC's collections information system in one or more of eight selected fields that are required and needed to identify and locate collection objects. OIG identified several factors that contributed to incomplete and inaccurate information in these fields, such as (1) the museum staff giving priority to opening the museum and (2) creating complete records only for the objects used in exhibits. Moreover, according to the Registrar, although the museum implemented its collection information system in 2008, the collections management staff did not develop cataloging standards until 2012. Incomplete and inaccurate data in a collection information system increases the risk that the museum may lose important historical and contextual information on objects. After we briefed NMAAHC managers on the interim results of our work, the museum took a number of actions to address the incomplete data in the collection records, including the object level field, which had the highest number of errors.

What Was Recommended

OIG made two recommendations to improve inventory controls at NMAAHC and a third recommendation to establish a timeframe for when new museums should have an inventory plan. Management concurred with all three recommendations.

For additional information or a copy of the full report, contact OIG at (202) 633-7050 or visit <http://www.si.edu/oig>.



Date: June 30, 2020

To: Spencer Crew, Acting Director, National Museum of African American History and Culture (NMAAHC)
Kevin Gover, Acting Under Secretary for Museums and Culture
William Tompkins, Director, National Collections Program

From: Cathy L. Helm, Inspector General *Cathy L. Helm*

Subject: Collections Management: The National Museum of African American History and Culture Needs to Enhance Inventory Controls Over Its Collections (OIG-A-20-05)

This memorandum transmits our final audit report on the Smithsonian's inventory controls over the collections at the National Museum of African American History and Culture (NMAAHC). The objective of this audit was to assess the extent to which NMAAHC had an inventory process and plan and had accurate and complete data in eight selected fields in its collection records.

OIG made two recommendations to improve inventory controls at NMAAHC and a third recommendation to establish a timeframe for when new museums should have an inventory plan. Management concurred with all three recommendations.

We appreciate the courtesy and cooperation of all Smithsonian management and staff during this audit. If you have any questions, please call me or Joan Mockeridge, Assistant Inspector General for Audits, at (202) 633-7050.

Table of Contents

Introduction	1
Background.....	2
Results of the Audit.....	6
<i>NMAAHC Had No Inventory Plan Until 2019, Has Not Conducted Any Cyclical Inventories, and Has Incomplete and Inaccurate Data in Collection Records</i>	6
Conclusion	12
Recommendations	13
Management Comments and OIG Evaluation	13
Appendix I: Related Office of the Inspector General Products.....	16
Appendix II: Objective, Scope, and Methodology	17
Appendix III: Collections Management Roles and Responsibilities at NMAAHC.....	19
Appendix IV: Description of Eight Selected Fields in NMAAHC’s Collection Information System.....	21
Appendix V: Management Comments and OIG Evaluation	22
Appendix VI: Major Contributors to Report.....	34

Figures

Figure 1. Photograph of Harriet Tubman taken between 1868 and 1869	2
Figure 2. Example of an object in the sample - playbill from Broadway musical, The Wiz.....	8
Figure 3. Forty-four Sampled Records Had Incomplete and/or Inaccurate Data in Six of the Eight Selected Fields	9
Figure 4. Organization Chart for NMAAHC Positions with Collections Management Responsibilities	19

Abbreviations

NMAAHC	National Museum of African American History and Culture
OIG	Office of the Inspector General
SD	Smithsonian Directive

Introduction

Collections form the core of any museum and are essential for exhibitions, research, and other public programs. Collections include objects, natural specimens, artifacts, and other items that are acquired, preserved, and maintained for public exhibition, education, and study. According to Smithsonian policy, the acquisition of collections imposes legal and ethical obligations to provide proper management, preservation, and use of the collections and their associated information.¹

Prior collections management audits and studies of Smithsonian museums have revealed significant problems with inventory control and the accuracy and completeness of collection records.² These audits also found that some museums failed to establish an effective inventory process.³ Failure to conduct inventories increases the risk that objects could be missing or stolen and that such losses remain undetected. Further, without accurate and complete collection records, it may be difficult to locate collection objects. Finally, valuable descriptive information, such as an object's historical significance and physical details may be lost if that material is not recorded in the collections information system.

The National Museum of African American History and Culture (NMAAHC) is the most recent addition to the Smithsonian. NMAAHC opened its doors to the public on September 24, 2016. The museum has a growing collection that includes almost 37,000 objects, ranging from photographs to a segregated rail car and an airplane used to train the Tuskegee Airmen.

This audit assessed the extent to which NMAAHC had an inventory process and plan and had accurate and complete data in eight selected fields in its collection records. To understand the inventory process and status of the inventory plan, the Office of the Inspector General (OIG) identified and reviewed applicable policies and procedures and interviewed Smithsonian managers and staff. Using a random sample selection process, OIG sampled 93 records from NMAAHC's collections information system to determine whether they contained complete and accurate information in the eight fields required and needed to identify and locate collection objects including object name and title, description, and current location. For a detailed description of OIG's objectives, scope, and methodology, see Appendix II.

OIG conducted this audit in Washington, D.C., and Landover, Maryland, from May 2018 to June 2020 in accordance with generally accepted government auditing standards. Those standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for its findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on its audit objective.

¹ Acquisition is the act of gaining legal title to a collection item or group of items.

² According to the *Smithsonian Directive 600 Collections Management Implementation Manual* (September 2006), collection records include the following: a unique registration number; object name/classification; holding unit; location; brief description, including associations, date or period, place of origin or discovery; and marks or distinguishing features.

³ For related OIG audit reports and testimony, see Appendix I.

Background

NMAAHC was established by Congress in 2003 to provide for the collection, study, and establishment of programs relating to African American life, art, history, and culture that encompass the period of slavery, the era of Reconstruction, the Harlem renaissance, the civil rights movement, and other periods of the African American diaspora.⁴ The museum began collecting objects in 2005 and had amassed a collection of almost 37,000 objects by July 2018. Included in the museum's collection are irreplaceable objects, such as a photograph of Harriet Tubman (see Figure 1), a shawl given to Harriet Tubman by Queen Victoria, a letter written by both John Brown and Frederick Douglass, and an electric guitar belonging to Chuck Berry. The museum's building on the National Mall in Washington, D.C., opened in September 2016 and has welcomed millions of visitors.

The NMAAHC Director is responsible for managing all aspects of museum operations. The director has the authority to specify how the museum uses its collections and resources, including its policies on programming, education, exhibitions, and research.

The director also oversees the preservation, restoration, and maintenance of the museum's collections. As a result, the director has the overall responsibility for the management of the collections and their information. The director delegates collections management and collections information management to appropriate staff, who implement the museum's policies and procedures. For an organizational chart and other information regarding museum positions involved in establishing inventory processes and collection records, see Appendix III.

The National Collections Program Director reports to the Deputy Under Secretary for Collections and Interdisciplinary Support, and is responsible for advising senior management, museum directors, and staff on matters relating to collection management policies, procedures, and standards. The National Collections Program Director is responsible for administering and monitoring the implementation of Smithsonian Directive 600 (SD 600), *Collections Management* (October 2001)—including the assessment of unit compliance—as well as coordinating the review and approval of museum collections management policies to ensure that collections are maintained according to Smithsonian policy, professional standards, and legal obligations.

Figure 1. Photograph of Harriet Tubman taken between 1868 and 1869



Source: Smithsonian Collections Search Center

⁴ Public Law 108-184, National Museum of African American History and Culture Act, December 16, 2003.

Smithsonian Collections Management Policy and *Implementation Manual*

Collections management is guided by SD 600. This directive, in conjunction with the SD 600 *Implementation Manual*, specifies that museums must establish and implement an inventory process and a written cyclical inventory plan. The Smithsonian Board of Regents—acting through the Secretary, the Under Secretaries, and the museum directors—is responsible for ensuring that collections growth is balanced with available resources and that prudent collections management policies are established, implemented, and monitored.

As specified by SD 600, each collecting unit must develop, implement, and adhere to an authorized, written collections management policy to establish general principles and standards that govern the collections activities, practices, and operations of the collecting unit. It provides a mechanism to ensure that decisions concerning collections are prudent, responsible, informed, and in accordance with the museum's mission. It also ensures the proper physical care and preservation of its collections; provides for the documentation of their identification, location, condition, and provenance; and ensures maximum accessibility to the collections consistent with their preservation, security, and legal considerations.

The *SD 600 Implementation Manual* requires that a collecting unit such as NMAAHC must accurately and comprehensively document its collection. It also requires collecting units to create and maintain accurate and complete inventory records that will identify, describe, and locate each object to ensure maximum accessibility consistent with its security.

A continuous inventory system is needed to support decisions regarding collections use, growth, storage, and security. SD 600 and the *SD 600 Implementation Manual* require that each unit 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 to prevent the unauthorized removal of collection objects. The inventory plan should be appropriate for the character and size of the collection; establish inventory procedures; and identify the valuable, sensitive, and significant collections.

The *SD 600 Implementation Manual* includes the following primary reasons to conduct inventories:

- A current inventory is one of the primary tools of accountability and collections management.
- Full inventory control requires creating and maintaining current and accurate information about the identification, location, and accessibility of collection items.
- The physical location of all collection items is documented.
- Effective collections management requires a continuous inventory system to support decisions regarding collections use, growth, storage, and security.

- An ongoing inventory system is an essential security device to deter and detect theft of collection items.
- Inventory is a critical component of ongoing collections documentation.

To safeguard Smithsonian assets, ensure compliance with applicable laws and regulations, and promote efficient use of resources, Smithsonian collecting units must create and maintain accurate and current inventory records.

Under SD 600, museums are required to conduct cyclical inventories. A cyclical inventory is a planned inventory of collections items, conducted according to a predetermined schedule. Cyclical inventories may include a complete inventory or a percentage or sample of the entire collection using statistically sound inventory methods. In addition, under the SD 600 *Implementation Manual*, museums may choose to randomly conduct unscheduled inventory spot checks to ensure that proper inventory control is being maintained. The museums should determine the circumstances under which spot check inventories are warranted and the information recorded. The SD 600 *Implementation Manual* also requires the following:

- inspection of the physical collection by designated inventory staff,
- recording the results of the inventory,
- reconciling the results of the inventory with the collecting unit's records,
- updating the appropriate data file to reflect the results of the inventory,
- that all inventory documentation is accurate and reflects that properly authorized persons approved or executed the inventory,
- oversight by the unit's designated inventory officer,
- an audit trail to ensure accountability,
- a copy of the inventory signed by all personnel involved and forwarded to the director or designee,
- a copy of the completed inventory, manual or electronic, copied and stored in a secure, separate location, and
- reporting the results of the inventory to the director, and appropriate office, including filing required reports, such as a Damage/Loss Report.

Inventory plans must be periodically reviewed to assess available resources and museum priorities, and implementation of the plans may be adjusted to accommodate changes but may not be abandoned. Adjustments must be reviewed and approved by the museum director in consultation with the accountable inventory officer and appropriate collections staff.

In accordance with SD 600, NMAAHC, as a collecting unit, is required to create and maintain accurate and current collection records to support collections management, research, and public education activities. According to SD 600, collection records should contain minimum information to identify and describe each object, such as a unique number, object name, location, dimensions, and a description. In addition to these minimum requirements, museums are expected to record additional information to provide a social, historical, or cultural context and to help improve the care and management of collections.

NMAAHC's Collection Management Policy

NMAAHC's *Collection Management Policy* (June 2019) states that the integrity, preservation, and accessibility of NMAAHC's collections and associated collection information are of the utmost importance to the museum, and they are vital for the curators, conservators, collections managers, registrars, and other staff charged with carrying out the museum's mission.

NMAAHC's policy recognizes that the importance and interdependent nature of objects and related documentation and the value of collections information lies in its quality, integrity, comprehensiveness, and availability. Therefore, the records and other documentary materials that support the collections are as important as the collection items and require the same degree of care and consideration.

In accordance with SD 600, NMAAHC's policy requires that all collection records must be created in an accurate, complete, and timely manner and updated regularly. The purpose of these records is to control and document objects in the collections and in the temporary custody of the museum.

Process for Creating Records in NMAAHC's Collections Information System

NMAAHC cataloging standards describe a multi-step process for creating collection records that begins when the museum receives a collection and the registrar assigns it a collection-level number. The registrar creates a record that contains some basic information to track the collection during the accessioning process—such as the location and general description, as well as the object level that identifies the significance of the object.

Once the collection-level information is entered into the collections information system, the objects are assigned to staff (cataloguers), who create the item-level records and assign numbers to the individual objects in the collection. Cataloguers first create basic shell records for all objects, including 11 required fields (such as location and object name/title) and 5 preferred fields (such as description and object type). Then, for objects identified as a priority--objects that are going on exhibit or have a significant public interest— cataloguers create complete records with additional fields, as defined in the museum's data entry standards. As stated in NMAAHC's cataloging standards, the museum's intent is that all objects will eventually receive full records. After a final review by the curator and the public access coordinator, the final record is released to the Smithsonian's Collections Search Center website.

Results of the Audit

NMAAHC Had No Inventory Plan Until 2019, Has Not Conducted Any Cyclical Inventories, and Has Incomplete and Inaccurate Data in Collection Records

OIG found that NMAAHC did not have a cyclical inventory process and plan, as required by Smithsonian policy, until almost 3 years after its target completion date—the museum’s September 2016 opening. In addition, NMAAHC has not conducted any inventories in accordance with the SD 600 *Implementation Manual* since it began establishing its collection in 2005. However, NMAAHC staff undertook activities to update the location field in the museum’s electronic collection information system when objects were moved either to be placed on exhibit or to a new location in a storage facility. Although these activities are important they did not meet the requirements for inventories under Smithsonian policy. According to the cyclical inventory plan now in place, the first cyclical inventory was to be conducted in the third quarter of 2020; however, museum officials said it would be delayed due to the COVID-19 pandemic. OIG also found that nearly half of the sampled inventory records in NMAAHC’s collections information system had incomplete or inaccurate data in one or more of eight selected fields. After we briefed NMAAHC managers on the interim results of our work, the museum took a number of actions to address the incomplete and inaccurate information in these fields.

NMAAHC Accumulated Almost 37,000 Objects Prior to Completing an Inventory Plan for Its Collections

NMAAHC has been collecting objects since 2005 but did not have an inventory plan until June 2019, when its collection management policy was issued.⁵ As of July 2018, the museum had collected almost 37,000 objects. SD 600 requires all museums to have an inventory plan and a collections management policy. NMAAHC designed its collection management policy to include its inventory plan. According to the Supervisory Curator of Collections at NMAAHC and the National Collections Program Director, NMAAHC’s collection management policy had been under development since 2009, and it was supposed to be completed before the museum opened in September 2016.⁶

NMAAHC managers said that the creation of a new museum—starting with no staff, building, or collection—placed a significant workload on the small staff hired to start the museum. Managers said their priorities were preparing exhibits and programming in time for the museum’s 2016 opening; internal activities, such as establishing policy documents and conducting cyclical inventories, were not a priority. As a result, museum management did not

⁵ NMAAHC developed a draft inventory plan in June 2018.

⁶ NMAAHC had four draft collections management policies (dated September 2013, December 2014, August 2016, and April 2018), but none of them had a cyclical inventory plan.

develop the collections management policy, including an inventory process and plan, in a timely manner, and the registrar has yet to conduct cyclical inventories.⁷

The Smithsonian's National Collections Program Director, who is responsible for assessing unit compliance with SD 600, said he was aware that museum management had decided to delay completion of the collection management policies, including the inventory process and plan, until after the museum opened. The National Collections Program Director also said it was unrealistic to expect a new museum that is establishing a collection, hiring staff, and building a facility to have a collection management policy at the outset, and noted that he kept both the Smithsonian's Provost and the Deputy Under Secretary for Collections and Interdisciplinary Support informed about the status of the museum's collection management policies.

SD 600 requires that all museums have an inventory process and plan, but it does not specify how much time a new museum can take to develop that plan. OIG recognizes that NMAAHC faced significant challenges in establishing a new museum and needed time to establish its policies and procedures. NMAAHC took more than a decade since acquiring its first object and almost 3 years after its September 2016 opening to establish a cyclical inventory process and plan.

NMAAHC Has Not Conducted Inventories of Its Collection as Required by Smithsonian Policy

OIG found that NMAAHC has not conducted any inventories in accordance with the SD 600 *Implementation Manual* since it began establishing its collection in 2005. NMAAHC is required to perform cyclical inventories as defined by SD 600. That policy calls for a cyclical inventory, which is a planned inventory of collection objects conducted according to a predetermined schedule. It may be either a complete inventory, or a specific percentage or sampling of the entire collection using a statistically sound inventory method. The policy also allows for museums to randomly conduct unscheduled inventory spot checks to ensure that proper inventory control is being maintained.

When OIG requested copies of reports for past inventories, the Supervisory Museum Curator of Collections provided a document that identified 12 inventories that had been conducted from 2013 to 2018 and no other reports or other documentation as required by the SD 600 *Implementation Manual*. This document stated that these activities were conducted to update the location field in the museum's electronic collection information system when objects were moved either to be placed on exhibit or to a new location in a storage facility. Although these activities are important for maintaining accurate records on collection objects, they are not inventories as defined by SD 600 because the SD 600 *Implementation Manual* requires that museums maintain a copy of the completed inventory and that the results of the inventory be reported to the museum director.

⁷ The NMAAHC collections management policy assigns the registrar the responsibility to conduct inventories.

NMAAHC's new inventory plan calls for cyclical inventories to be conducted during the third quarter (April to June) of alternating fiscal years. These inventories will use a random list of collection objects and incoming loan objects representing 1 percent of the collection. The plan calls for a complete inventory of high-value or historically significant objects every other year. The plan requires the registrar to prepare a report that outlines the findings of the inventory and to identify any errors in the records. The report is to be signed by those involved in the inventory and provided to the NMAAHC Director and the National Collections Program Director.

Failure to conduct cyclical inventories can result in significant issues, such as missing objects and poor records, as OIG has found in audits of other Smithsonian museums.⁸ According to the SD 600 *Implementation Manual*, a current inventory is one of the primary tools of accountability and collections management. In addition, a continuous inventory system helps to support decisions regarding collections use, growth, storage, and security and is an essential security device to deter and detect theft of collection items.

Nearly Half the Sampled Records from NMAAHC's Collections Information System Contained Incomplete or Inaccurate Data

OIG sampled 93 of NMAAHC's collection records to assess the completeness and accuracy of 8 selected fields that are required and needed to identify and locate the objects.⁹ For an example of an object in the sample—a playbill from the Broadway musical, *The Wiz*—see Figure 2. OIG analysis showed that 49 of the 93 records (53 percent) had complete and accurate information in the 8 fields. The fields containing the object number and curatorial division were complete and accurate in all 93 records. However, 44 records (47 percent) contained either incomplete or inaccurate information, or both, in one or more of the eight selected fields, as shown in Figure 3. Based on the results of this review, OIG estimated that 47 percent of the museum's approximately 28,000 collection records had incomplete or inaccurate data in at least 1 of the 8 selected fields.¹⁰

Figure 2. Example of an object in the sample - playbill from Broadway musical, *The Wiz*

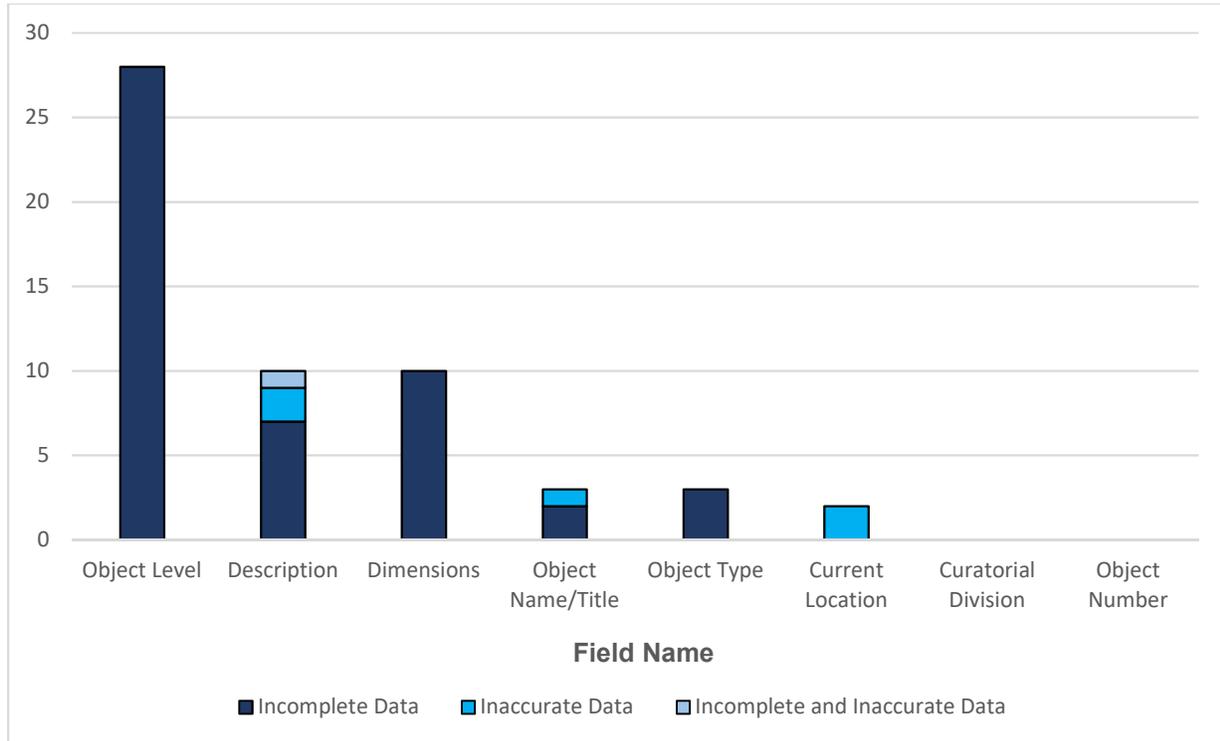


⁸ ["Collections Stewardship of the National Collections at the National Museum of American History—Inventory Controls,"](#) (A-10-03-1, February 8, 2011); ["Audit of Physical Security and Inventory Control Measures to Safeguard the National Collections at the National Museum of Natural History,"](#) (A-05-06, September 29, 2006).

⁹ Five of these eight fields are included in the SD 600 minimum documentation requirements: object number, object name/title, location, dimensions, and description. NMAAHC's cataloging standards require two of the remaining fields (object level and object type). According to the Supervisory Curator of Collections, the registrar is required to complete the final field (curatorial division). For further information on these fields, see Appendix IV.

¹⁰ OIG's confidence in the precision of the sample results is a 95 percent confidence interval (plus or minus 10 percentage points). NMAAHC has almost 37,000 objects, which are represented by 28,000 records. One record can have multiple objects associated with it, such as a costume with multiple pieces.

Figure 3. Forty-four Sampled Records Had Incomplete and/or Inaccurate Data in One or More of the Selected Fields



Source: OIG analysis of 8 selected fields for a random sample of 93 records in NMAAHC’s collection information system

For the 44 records that had incomplete or inaccurate information in 1 or more fields, OIG found the following:

- Thirty-eight records had incomplete information, either blank or partial data, in one or more of the following fields: object level (28), dimension (10), description (7), object type (3), and object name/title (2). Data in the object level field classifies collection objects based on their significance into one of three levels and helps identify the highest value objects (Tier 3) that must be inventoried every other year, according to the inventory plan.¹¹ OIG found that the single Tier 3 object in its sample had complete information in the object level field; however, 28 records for Tier 2 objects did not have data in the object level field. The Supervisory Curator for Collections said staff took special care to complete the object level field for Tier 3 objects. The remaining 4 fields provide important information to identify objects for inventory, research, public programming, and other purposes.
- Three records had inaccurate data in one or more of following fields: description (2) and object name/title (1). For example, one record had an inaccurate description of an object. The description field noted that the object was “three photocopies of a

¹¹ The museum uses a Tier 3 designation category for objects that are of special cultural or scientific significance, highly valuable, highly sensitive to light or changes in humidity or temperature, or especially fragile. All other objects in the collection are designated as Tier 2. Tier 1 designation is given to items that are not considered part of the collection (such as educational items and props).

newspaper article on one page” when in fact the object was a “List of Class of 45-C Tuskegee Airmen.” Staff were able to identify the object because it had a label with the object number on it. On further review, however, OIG found that the description of this object and the next object record in the collection had been switched erroneously.

- Two records had inaccurate data in the location field. One record involving the Henry Clay Anderson Collection had inaccurate information in the location field, and museum staff were unable to locate a photo negative that is part of that collection.¹² Museum staff told OIG they had determined in June 2016 that several objects in the Anderson collection could not be located. Forty of the 250 Anderson negatives a staff person had scanned as part of a digitization project in 2016 could not be located. Museum staff have not conducted a full inventory of this collection since it was acquired in 2007, but plan to have a contractor complete an inventory of the negatives within the next year. The second record with an inaccurate location, for a photograph, had “C 50” in the location field, instead of the correct location of “CR 50.” (“C” stands for cabinet, but “CR” stands for cabinet rack—two different types of storage equipment used by the museum.) Although museum staff were able to locate the object, the inaccurate location made it more difficult.
- One record’s description field had both incomplete and inaccurate information. For example, the description field for that record was incomplete; it showed “[object number] A color photograph of _____,” with no actual description of the photograph. The field was also inaccurate because it stated that the photo album page was decorated with star-shaped stickers, but the page did not contain any stickers. Although OIG identified the page in the photo album using the object number, the lack of a complete and accurate description of the photograph on the page not only prevents curators, researchers, and the public from using this record for research or educational purposes, but also makes it difficult for registrar staff to identify objects during inventories. Furthermore, OIG noted that the 19 remaining records for this album, which were not part of the sample, also had inaccurate and incomplete data in the description field.

SD 600 requires that NMAAHC, as a collecting unit, create and maintain accurate and current collection records to support collections management, research, and public education activities. It also requires that collection records should contain minimum information to identify and describe each object, such as a unique number, object name, location, dimensions, and a description. In addition to these minimum requirements, museums are expected to record additional information to provide a social, historical, or cultural context and to help improve the care and management of collections. Federal internal control standards state that management should use quality data to achieve its objectives. Quality data are appropriate, current, complete, accurate, accessible, and provided on a timely basis.¹³ Quality data allow for effective monitoring and inventories.

¹² The Henry Clay Anderson collection includes 4,200 photo negatives. Anderson was an African American photographer, and the collection of his photographs provide a look into the lives of African Americans in segregated Greenville, Mississippi, from the 1940s to the 1970s.

¹³ GAO-14-704G, *Standards for Internal Control in the Federal Government* (September 2014).

According to the Supervisory Curator of Collections, the museum staff have procedures to help ensure that the location field is accurate and that objects can be located. For example, the collections information system requires two different staff members (a location handler and location approver) to be involved when making any changes to the location field. This collection information system also creates an audit trail of data changes that shows who made and approved any changes, along with the original information.

OIG identified several factors that contributed to the incomplete and inaccurate information in the eight selected fields. First, NMAAHC management said the priority was to open the museum, including creating complete records only for the objects used in exhibits, and not to establish complete collection records for non-priority objects. As a result, OIG estimated that nearly half of NMAAHC's collection records contained incomplete or inaccurate data in these fields.

Second, according to the registrar, although the museum implemented its collection information system in 2008, the collections management staff did not develop cataloging standards until 2012. These standards requirements establish the minimum documentation for collection information systems; therefore, the staff created many collection records for several years with no written guidance on required fields. OIG analysis showed that 63 percent of sampled records with incomplete information were objects accessioned prior to 2012.¹⁴

Finally, according to museum management, there has not been sufficient staff to create complete records for all objects in a timely manner. The museum initially had two staff members responsible for entering data into the collections information system. The Supervisory Curator for Collections said that since 2012 the museum has expanded the team to four dedicated full-time staff and four staff who spend part of their time entering data into the collection records (cataloguers). NMAAHC collections management staff told OIG that despite the new cataloging standards and the increased number of cataloguers, the growth rate of the collection exceeds the staff's ability to enter complete data into the records for all objects as they are accessioned. Therefore, cataloguers are still primarily creating complete records for priority objects, such as those on exhibit or those that have a significant public interest. For non-priority objects, cataloguers are creating basic shell records with a limited number of fields used primarily for tracking the physical location of objects.

Incomplete and inaccurate data increases the risk that the museum may lose an object or important historical and contextual information on objects. Furthermore, without a complete and accurate description in an object's record, museum staff could have difficulty identifying the object. It can also hinder the ability to conduct inventories. For example, without the object level information, the museum staff will not be able to readily identify those objects needing more frequent inventories. If important historical and contextual data about an object are not promptly recorded, it may be lost or forgotten.

¹⁴ Accessioned objects have gone through a formal process for the Smithsonian to legally acquire and record them as part of a Smithsonian collection.

Recent Management Action

After we briefed NMAAHC managers on the interim results of our work, the museum took a number of actions to address the incomplete and inaccurate information in the eight selected fields. For example, NMAAHC's registrar and cataloguers updated 31 of the 44 sampled records that contained incomplete or inaccurate data. In addition, according to Smithsonian management, the registrar addressed the incomplete data in the object level field for all its collection records in February 2020. The object level field has the highest number of errors in the sampled records.

Conclusion

The collections drive the mission and the work of the Smithsonian. NMAAHC has amassed a collection of almost 37,000 objects and needs to strengthen its inventory controls to enhance collections management. OIG recognizes that the start-up of this museum was a daunting task. The museum faced numerous challenges in establishing a large, historically significant collection while financing, designing, and constructing a new building. Moreover, in the early years, NMAAHC had few staff to complete these tasks.

Collections management requires an inventory process, as well as complete and accurate collection records. As a new museum, NMAAHC was in a unique position while building its collection to develop and implement an inventory process that provides complete and accurate records and includes periodic inventories to safeguard the collections. Unfortunately, this opportunity was not realized due to competing priorities related to building and opening the new museum on schedule. As a result, it took more than a decade after acquiring the first collection object for NMAAHC to finalize its inventory process and plan, and the museum still has not conducted any inventories in accordance with the SD 600 *Implementation Manual*.

A continuous inventory system is needed to support decisions regarding collections use, growth, storage, and security. NMAAHC's cyclical inventory plan was scheduled to be implemented in June 2020, but has been postponed due to the COVID-19 pandemic. When implementation occurs, the museum will be in compliance with SD 600, which sets forth the Smithsonian's policy governing required cyclical inventories. Nevertheless, the lack of a cyclical inventory has created unnecessary risk for the museum's collection. In fact, the SD 600 *Implementation Manual* states that a current inventory is one of the primary tools of accountability and collections management.

Incomplete and inaccurate data in a collections information system increases the risk that the museum may lose objects or important historical and contextual information on objects. These fields are required and provide useful information to curators, researchers, and the public. Further, this information is important to ensure that objects can be located and that valuable descriptive information—such as an object's historical significance, location, and physical details—are not lost.

SD 600 sets forth the Smithsonian's policy governing required inventory plans and processes and collections management policies. However, the directive does not include a timetable for compliance by a new museum; therefore, there is no requirement for the timely creation of a collections management policy or inventory plan when a new museum or collecting unit is established.

Recommendations

To strengthen collections management at NMAAHC, OIG recommends that the Interim Director:

1. Conduct a cyclical inventory in accordance with the inventory plan.
2. Develop a plan, with identified resources and estimated completion dates, to ensure that all collection records have complete and accurate information in the eight selected fields.

OIG recommends that the National Collections Program Director:

3. Revise SD 600 to include a timeframe for when new collecting units are required to have an inventory process and plan.

Management Comments and OIG Evaluation

OIG provided the Smithsonian a draft of this report for review and comment, and Smithsonian management provided written comments. These comments, along with our responses, are reproduced in their entirety in Appendix V. OIG incorporated management's technical comments into the report, as appropriate.

Smithsonian management states that the draft report did not adequately acknowledge the challenges that NMAAHC faced to finalize a collection management policy and the actions taken to overcome those challenges. However, the draft report stated that the creation of a new museum—starting with no staff, building, or collection—placed a significant workload on the small staff hired to start the museum. In addition, it discussed museum staff efforts to develop draft and final policies. The report acknowledges that NMAAHC's collection management policy had been under development since 2009, but the first draft cyclical inventory plan was not developed until June 2018. The audit assessed the extent to which the museum had an inventory process and plan; it did not examine all collection management activities.

Smithsonian management acknowledges that NMAAHC has not conducted any cyclical inventories, but states that the draft report does not recognize that other inventories were conducted. The report has been revised to clarify that no inventories as defined by the SD 600 *Implementation Manual* were conducted. This manual requires museums to maintain a copy of the completed inventory and to report the results of the inventory to the museum director. When

OIG requested copies of reports for past inventories, an email was provided that listed one “full inventory” in 2013 and 11 “spot check inventories” from 2015 to 2018; no other documentation was provided. Although these activities may not meet the requirements for an inventory, OIG acknowledges that they are important for maintaining accurate records when collection objects are moved.

The Smithsonian disagrees with OIG’s conclusion that the lack of a cyclical inventory until late 2020 creates unnecessary risk for the museum’s collection. OIG believes that the collections faced unnecessary risk because the museum has not conducted cyclical inventories since collecting its first object in 2005. According to the SD 600 *Implementation Manual*, a current inventory is one of the primary tools of accountability and collections management. In addition, a continuous inventory system helps to support decisions regarding collections use, growth, storage, and security and it is an essential security device to deter and detect theft of collection items.

The Smithsonian states that the draft report deemphasizes that the data in the sampled records are generally accurate although some information may be lacking. However, the draft report states that 49 of the 93 records (53 percent) had complete and accurate information in the 8 fields and that 2 fields (object number and curatorial division) were complete and accurate in all sampled records. The draft report provides more detail on the incomplete and inaccurate information. Furthermore, OIG commends NMAAHC collection management officials for prompt action to address the incomplete data in the object level field for all of its collection records. The report has been updated to reflect this recent management action.

The Smithsonian states that the draft report conclusions are misleading when the draft report asserts that incomplete and inaccurate data in the selected fields increases the risk that objects or important historical and contextual information may be lost. Moreover, the Smithsonian states that the OIG findings reflect that the museum’s process to ensure accuracy of information is working. OIG’s conclusions are not misleading. OIG found evidence that incomplete and inaccurate data in a collection information system can increase the risk that a museum may lose an object or important historical and contextual information on objects. For example, one sampled record had inaccurate information in the location field, and museum staff were unable to locate a photo negative. Museum staff told OIG that they had determined in June 2016 that several objects in this collection could not be located. In addition, the Smithsonian has emphasized the sample results for four of the eight fields that had the least amount of errors.

Smithsonian management states that they concurred with all three recommendations. However, they do not concur with the third recommendation to the extent that it would require a specific deadline for the completion of an inventory process and plan.

The third recommendation is to revise SD 600 to establish a timeframe for when new collecting units should have an inventory process and plan. The Smithsonian proposes to develop appropriate policy guidance and templates regarding inventory processes and plans, instead of establishing “an arbitrary, one-size-fits-all” deadline when new units are required to have a formal inventory process and plan. OIG did not recommend that the Smithsonian establish an arbitrary deadline for having an inventory process and plan. OIG believes that it is reasonable

for the Smithsonian to have a period of time for when it expects a new museum to have an inventory process and plan in place. The establishment of timeframes can consider a variety of factors, such as the length of time since establishing its collection and the size of a collection. For NMAAHC, the expectation was to have its policy finalized before the museum opened in September 2016. However, OIG found that NMAAHC has been collecting objects since 2005 without a collections management policy, which was to include an inventory plan, until June 2019. In addition, the museum had not conducted any inventories as required by the SD 600 *Implementation Manual*.

Appendix I

Related Office of the Inspector General Products

- *Audit of Pan-Institutional Initiatives Addressing Collections Care (A-13-11)*, September 14, 2015
- Hearing before the Committee on House Administration, *Collections Stewardship at the Smithsonian*, July 17, 2013
- *Audit of Collections Stewardship of the National Collections at the National Museum of American History – Preservation and Physical Security (A-10-03-2)*, September 30, 2011
- *Audit of Collections Stewardship at the Cooper-Hewitt, National Design Museum (A-11-02)*, September 12, 2011
- *Audit of Collections Stewardship of the National Collections at the National Museum of American History – Inventory Controls (A-10-03-1)*, February 8, 2011
- *Audit of Physical Security and Inventory Control Measures to Safeguard the National Collections at the National Air and Space Museum (A-09-04)*, March 17, 2010
- *Audit of Physical Security and Inventory Control Measures to Safeguard the National Collections at the National Museum of Natural History (A-05-06)*, September 29, 2006

Objective, Scope, and Methodology

The objective of this audit was to assess to what extent the National Museum of African American History and Culture (NMAAHC) had an inventory process and plan and had accurate and complete data in eight selected fields in its collection records.

To understand the Smithsonian requirements for a museum's inventory process and plan, the Office of the Inspector General (OIG) identified and reviewed Smithsonian policies and procedures, including Smithsonian Directive 600 (SD 600), *Collections Management* (October 2001) and the SD 600 *Implementation Manual* (September 2006). To assess the museum's inventory plan and process, OIG obtained and reviewed NMAAHC's draft collections management policies (dated September 2013, December 2014, August 2016, and April 2018) and its final collections management policy (June 2019). OIG also reviewed NMAAHC's draft cyclical inventory plan (June 2018) and its final cyclical inventory plan (June 2019). OIG also reviewed organizational charts and other documents.

OIG also interviewed management and staff in the following Smithsonian units: the National Collections Program, NMAAHC, and the Office of the General Counsel. At NMAAHC, OIG met with the Registrar, Head of Collections Management, Supervisory Museum Curator for Collections, Associate Director for Curatorial Affairs, the museum's then-Director, and the Interim Director.

To assess the completeness and accuracy of data in selected fields in the collections records, OIG interviewed NMAAHC management and staff and received a demonstration of how data is entered and viewed in the collections information system. OIG also obtained and reviewed the museum's cataloging standards that detail the process for creating collection records. OIG selected eight fields that are required and needed to identify and locate collection objects based on the following: (1) discussions with NMAAHC's Supervisory Curator for Collections and Registrar and (2) a review of SD 600's minimum documentation requirements and NMAAHC's cataloging standards. The eight fields are: curatorial division, current location, description, dimensions, object level, object name/title, object number, and object type. Five of these eight fields are included in the SD 600 minimum documentation requirements: object number, object name/title, location, dimensions, and description. NMAAHC's cataloging standards require two of the remaining fields (object level and object type). According to the Supervisory Curator for Collections, the Registrar is required to complete the final field (curatorial division).

OIG sampled 93 records from a population of approximately 28,000 collection records (representing almost 37,000 objects) from NMAAHC's collections information system, and OIG assessed the data in the 8 selected fields for completeness and accuracy. OIG was able to

project the results of this sample to the population.¹⁵ To determine the completeness of the 8 fields, OIG reviewed the 93 records to determine whether there was complete information in each of the 8 selected fields. To verify that the information was accurate, OIG reviewed the information in these fields, attempted to locate the sampled objects in storage or on exhibit, and matched the information in the 8 selected fields to the actual object. OIG visited the museum in Washington, D.C., and a collections storage facility in Landover, Maryland, with NMAAHC collections staff to locate the sampled objects.

OIG conducted this performance audit in Washington, D.C., and Landover, Maryland, from May 2018 through June 2020 in accordance with generally accepted government auditing standards. Those standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for its findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on its audit objective.

¹⁵ OIG randomly selected a probability sample from the population of collection records in NMAAHC's collections information system, as of July 2018. Because OIG followed a probability procedure based on random selections, the sample is only one of a large number of samples that OIG might have drawn. Because each sample could have provided different estimates, OIG expresses its confidence in the precision of our particular sample's results as a 95 percent confidence interval (for example, plus or minus 10 percentage points). This interval would contain the actual population value for 95 percent of the samples OIG could have drawn. As a result, OIG is 95 percent confident that the confidence intervals in this report will include the true values in the study population. All percentage estimates from the sample of collection records have a sampling error (confidence interval widths) of plus or minus 10 percentage points or less.

Collections Management Roles and Responsibilities at NMAAHC

The Director of the National Museum of African American History and Culture (NMAAHC) is responsible for managing all aspects of museum operations (For an organizational chart, see Figure 4). The NMAAHC Director has the authority to specify how the museum uses its collections and resources, including its policies on programming, education, exhibitions, and research. The director also oversees the preservation, restoration, and maintenance of the museum’s collections. As a result, the director has the overall responsibility for the management of the collections and their information. The director delegates collections management and collections information management to appropriate staff, who implement the museum’s policies and procedures.

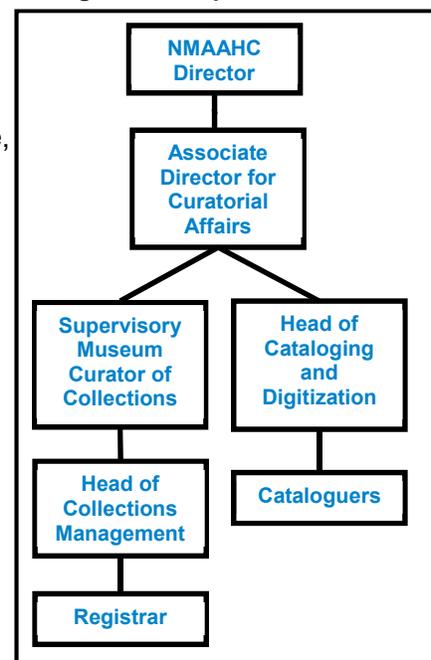
The Associate Director for Curatorial Affairs has been delegated the authority to review and revise the museum’s policies and procedures on collections management and collections information management subject to the director’s approval. The associate director also provides policy guidance, program direction and planning, and budget support to carry out the requirements of the collections management policy. In addition, the associate director approves collections management and collections information management standards and procedures.

The Supervisory Museum Curator of Collections advises and assists museum management in the establishment, development, implementation, review, and revision of the museum’s collections management and collections information management policy and procedures, and works with the Head of Cataloging and Digitization to implement these policies and procedures.

The Head of Collections Management and the Head of Cataloging and Digitization advise and assist the Supervisory Museum Curator of Collections in duties involving collections management policies and procedures.

The Head of Cataloging and Digitization also creates standards and procedures for documenting, cataloging, and digitizing collections for approval by the Assistant Director for Curatorial Affairs. This includes the creation and enhancement of digital collections records in the museum’s collections information system, as well as digital images of the objects. The Head of Cataloging and Digitization oversees a team of cataloguers who enter data into the collections information system.

Figure 4. Organization Chart for NMAAHC Positions with Collections Management Responsibilities



Source: OIG analysis of NMAAHC organization charts and collections management policy.

The Registrar maintains records of collections transactions and associated records documenting collections-related activities. The Registrar is also responsible for coordinating cyclical inventories and maintaining the museum's records of its inventories.

Appendix IV

Description of Eight Selected Fields in NMAAHC's Collection Information System

The Office of the Inspector General (OIG) selected the eight fields listed below because they are required and needed to identify and locate collection objects. Five fields are included in the Smithsonian Directive 600 minimum documentation requirements: object number, object name/title, location, dimensions, and description. The National Museum of African American History and Culture's (NMAAHC) cataloging standards require two of the remaining fields (object level and object type). According to the Supervisory Curator of Collections, the Registrar is required to complete the final field (curatorial division).

Curatorial Division: General department sub-categories used by the museum when reporting collection statistics to Smithsonian management, including archives/research, history/culture, visual arts, and photography. This field is input by the Registrar.

Current Location: The physical location where objects are currently stored, whether on display, in storage, or out on loan.

Description: A physical description of the object, sufficient to distinguish it from other similar objects.

Dimensions: Measurements of the object, which should describe the physical space occupied by an object, providing requirements for both storage and exhibition space, as well as identifying physical information.

Object Level: A category defining the significance of an object based on its historic value, rarity, or use. The Tier 3 category is used for objects that are of special cultural or scientific significance, highly valuable, highly sensitive to light or changes in humidity or temperature, or especially fragile. All other objects in the collection are designated as Tier 2; items that are not considered part of the collection (such as educational items or props) are designated Tier 1. The object level is input by the Registrar.

Object Name/Title: The name or title that identifies the object. The object name is a concise description that can identify the object, such as "electric guitar belonging to Chuck Berry." The object title is what an artist has assigned to the object.

Object Number: A unique identification number assigned to each collection object.

Object Type: The physical form of an object, such as "dress" or "military uniform."

Management Comments and OIG Evaluation



Smithsonian Institution
*National Museum of African American
History and Culture*

MEMO

Office of the Director

Date May 13, 2020

To Cathy L. Helm, Smithsonian Inspector General

From Spencer Crew, Interim Director, National Museum of African American History

and Culture 
William Tompkins, Director, National Collections Program
Kevin Gover, Acting Under Secretary for Museums and Culture
Scott Miller, Deputy Under Secretary for Collections and Interdisciplinary
Support

cc Amy Marino, Senior Program Officer, Office of the Under Secretary for
Collections and Interdisciplinary Support
Judith Leonard, General Counsel
Craig Blackwell, Associate General Counsel
Greg Bettwy, Chief of Staff to the Secretary
Kinshasha Holman Conwill, Deputy Director, NMAAHC
Debra McDowell, Chief of Staff, NMAAHC
Dwandalyn Reece, Associate Director of Curatorial Affairs, NMAAHC
Michèle Gates Moresi, Supervisory Museum Curator of Collections, NMAAHC

Subject Management Response to the Report of the Inspector General Collections
Inventory Audit of the National Collections at the National Museum of African
American History and Culture, Number A-18-06

We welcome the opportunity to respond to the Collections Inventory Audit, conducted May 2018 to April 2020, at the Smithsonian's National Museum of African American History and Culture. We respect the time and care that went into this audit and appreciate the collegiality of the Office of the Inspector General (OIG) audit team in preparing the recommendations to strengthen collections inventory. We concur

SMITHSONIAN INSTITUTION
National Museum of African American
History and Culture
1400 Constitution Avenue, NW
MRC 1400, PO Box 37012
Washington, DC 20013-7012
202.633.4751 Telephone
202.633.4816 Fax

with the recommendations and have made clarifying comments on the audit findings. We are encouraged by the audit's findings regarding the museum's ability to ensure a high level of collection location control and high-quality, accurate information. Although the report deemphasizes these findings, the findings revealed that 99% of objects were located in the place listed within the object record, and the information was accurate in 95% of the records.

OIG
Comment
1

Care and stewardship of the national collections are among the highest priorities of the Smithsonian and is frequently one of the most challenging responsibilities. Especially in the case of the National Museum of African American History and Culture (NMAAHC), the new museum was named and created before its collection and before a building existed. Thus, the newest museum in the Smithsonian grew its staff and its collections in tandem with developing procedures, protocols, and policies—all of which occurred in the span of approximately ten years from the appointment of the museum director to the opening of the landmark building in September 2016. Throughout the journey, NMAAHC sought to uphold both Smithsonian expectations and professional standards for excellence in collections management.

This document outlines actions taken since the audit was initiated in May 2018 and planned future measures to address the recommendations. We recognize the OIG's assessment in this audit that NMAAHC faced competing priorities related to building and opening the museum in a short timeframe, which impacted the expediency to implement a finalized cyclical inventory process and plan.

We find the OIG Audit Report conclusions are misleading. The report asserts that incomplete and inaccurate fields in the museum's collections information system (TMS) indicate that NMAAHC is at risk of losing collections objects or important historical and contextual information about objects; when in fact, the OIG's findings reflect that the museum's process to ensure accuracy of information is working, such as the implementation of cataloging guidelines that require multiple careful reviews, research, and verification. Ultimately, the OIG findings show that of the records sampled, 99% were in the location listed in the record, 93% included a description, 97% included an object type, 98% included an object name/title, and in 95% of the records, although some information may be lacking, the information in the record is accurate.

OIG
Comment
2

The work of creating and maintaining data about museum collections in an information system is protracted and goes well beyond simple data entry. Aside from inventory and tracking (knowing and verifying the location of each object), the museum uses a collections information system, called TMS, to capture qualitative information generated from research by curators, museum specialists, and catalogers. Transferring such research into the multiple fields of TMS is an ongoing process with numerous steps, varies widely from object to object, and is subject to change over time as new information or new research comes to light. Each of these steps is outlined in a user's guide for museum staff. Many of the inaccuracies identified in the report were object records with a specific status in TMS, "Cataloging in Process," meaning they were currently being cataloged and thus known to the staff to have blank or imprecise data fields. The report would be more accurate to reflect the number of records identified as "Cataloging in Process," and not, more simply, records described as incomplete and inaccurate. Finally, the report implies that museum management operates without location control systems and

OIG
Comment
3

guidelines for entering data into the collection information system (TMS). When, in fact, the report demonstrates these controls and guidelines are working. The museum's process dictates that information should be verified before being entered into collection fields to ensure accurate records.

Response to Findings

NMAAHC does not refute the general findings of the Collections Inventory Audit that the museum did not promptly finalize a formally approved cyclical inventory plan or that some object records contain "incomplete and inaccurate" information. NMAAHC readily acknowledges there is room to improve by re-evaluating priorities and by targeting resources to identified areas within collections management. But museum management takes exception to the OIG's conclusions that museum operations placed the collections at unnecessary risk. Instead, NMAAHC asserts that it can document object records identified as "incomplete and inaccurate," and that the registration and cataloging practices ensure a high level of collection location control and high quality, accurate information.

OIG Comment 4

OIG Finding: Museum management did not develop the collections management policy, including a cyclical inventory plan, in a timely manner.

Response: Museum management generally concurs but qualifies that management practices were in place to implement sound collections management activities.

NMAAHC operated in a continuous state of evolution as staff and leadership expanded. This is not adequately acknowledged. The OIG report acknowledges the multiple demands of a new museum—starting with no staff, no building, and no collection—that posed challenges for NMAAHC to finalize a Collections Management Policy, but the report underestimates the efforts and actions taken to overcome these challenges. The museum actively worked with draft policies, used established Smithsonian guidelines and manuals, and frequently consulted with appropriate Smithsonian offices to implement sound collection management practices. Since NMAAHC is within a larger organization, NMAAHC used Smithsonian Directive (SD) 600 and its implementation manual to guide all collections management. Additionally, NMAAHC remained in open communication about collection management operations with the Smithsonian's National Collections Program (NCP) and the Office of General Counsel (OGC).

OIG Comment 5

NMAAHC wrote a collections management policy in 2009, which was submitted to the director and NCP as a draft. This version operated as a working policy that was used, along with SD 600, to guide collections management operations. Subsequent revisions of the policy were developed and shared with NCP in September 2013, December 2014, and August 2016, and each new version became the working policy for the museum. This information was provided to the auditors on August 20, 2018.

OIG Comment 6

Thus, while public-facing activities prioritized staff time, and the finalization of policies was delayed, staff applied professional collections management principles and

procedures that uphold SD 600 guidelines and ensure accuracy for tracking and locating museum collections. In particular, draft policies were shared with collections management and curatorial staff, and training was provided to staff for moving and handling objects, and for tracking movement information within the museum's collections information system.

OIG Finding: NMAAHC had not conducted any inventories since it started collecting in 2005.

Response: Museum management concurs that a cyclical inventory had not been conducted, but disagrees with the OIG assertion that no inventories were conducted.

OIG Comment 7

The museum's practice of conducting periodic inventories is not recognized. The OIG report asserts that NMAAHC did not conduct any inventories since it started collecting in 2005. However, NMAAHC provided to the auditors on June 28, 2018, a memo describing the inventories conducted. The memo states that in 2013, NMAAHC did a full inventory when the entire collection was moved into the museum's Pennsy Drive expansion space. Also, NMAAHC provided the auditors with specific information about at least ten spot inventories conducted between 2015 to 2018. Those inventories included: (1) in 2015, a selective inventory of 3.5% of the collection of objects in storage cabinets; (2) in 2016, a selective inventory of objects moved from Capital Gallery to Pennsy Drive representing approximately 2.5% of the collection; (3) in 2017, an inventory of Temporary Receipts representing 8.9% of the museum's holdings; (4) also in 2017, a selective inventory of oversized objects (furniture) representing 1.13% of the collection; (5) in 2016, spot inventories of objects displayed in exhibitions were conducted of galleries and storage rooms on the Mall after the installation of the inaugural exhibitions (10% of the collection); (6) in 2017-2018, an inventory of media materials representing 4.39% of the collection; (7-10) in 2016-2018, several spot inventories were conducted of temporary installations, including the Center for African American Media Arts (CAAMA) gallery (0.66% of the collection), *More Than a Picture* (0.66% of the collection), and *The Poor People's Campaign* (0.66% of the collection) exhibitions, and in 2018, of objects displayed in the exhibition, *The Oprah Winfrey Show*, representing 1.33% of the museum's holdings.

Although the museum had not issued a written cyclical inventory plan, the museum followed SD 600 standards by conducting periodic spot inventories as described above. SD 600 states that a collecting unit's cyclical inventory "may include a complete inventory or a specific percentage or sampling of the entire collection inventory as predetermined using statistically sound inventory methods. The method and frequency of collections inventories may be based on value, sensitivity, and historical, aesthetic, or scientific significance." (SD 600, October 26, 2001, p.19)

NMAAHC has a fully executed Collections Management Policy as of June 3, 2019. It includes a Cyclical Inventory Plan in the appendices. NMAAHC Cyclical Inventory Plan occurs in the 3rd Quarter (April-June) in 2020. Due to the COVID-19 Emergency Status that began in March 2020, plans to conduct such an inventory were postponed.

OIG Finding: Nearly half the sampled records from NMAAHC’s Collections Information System contained incomplete or inaccurate data.

Response: Museum management acknowledges the numeric findings of the OIG's sampled object records but disagrees with the impression conveyed that the state of NMAAHC object records causes an increased risk of loss, theft, or incomplete historical or contextual information.

The museum’s methods of location tracking, security, and cataloging are not adequately described in the OIG report. The OIG analysis of the sample inventory implies that each type of data assessed during the audit is equally important for tracking location or is essential for inventory. Additionally, the report implies it is reasonable to expect a new museum with new staff that continues to grow, and a new collection that also continues to grow, to have 100% of its records meet the museum's high standards of a Cataloged Record, and meet the higher standard of a Public Record (see below).

OIG Comment 8

With limited resources, the registration and cataloging staff make sure they honor the responsibility for collection stewardship by creating a Shell Record (defined below) within 48 hours of receipt that prioritizes the information in the database needed to track the objects accurately. This care is reflected in the audit. We note that 63% of the 93 records sampled by the OIG were accessioned before 2012 when the museum had limited staff and before the cataloging standards were in place. Additionally, of the 93 records sampled by OIG, only one object (1%) could not be located. Furthermore, the collection object that could not be located is among a collection of objects with known inventory issues. These issues were discovered and carefully documented by the staff engaged in digitizing the collection. This documentation was shared with the auditors in October 2018. The collection in question has been deemed off-limits for catalogers until a targeted and comprehensive inventory can be conducted by the Registrar's Office.

NMAAHC maintains a high level of collection location control by ensuring the accuracy of object numbering, maintaining correspondent database records with identical numbering, and maintaining accurate location histories. The critical TMS fields for tracking locations are object number and location. Provided the object is accurately tagged, other descriptive information is helpful, but not essential for accurate tracking. All records include some descriptive information, although the type may vary from record to record until the record meets the museum’s standard for a Cataloged Record (see below). Further, location control is enhanced with security groups in TMS that limit location information to only those staff directly handling and working with collections, including registrars, curators, collections specialists and managers, catalogers, and conservators. Only a subset of this group is allowed to enter location information in TMS. The museum also utilizes collection movement policies to add another layer of control—authorized “Location Approvers” and “Location Handlers” in TMS. When documenting an object’s movement in TMS, the Approver and Handler cannot be the same individual. NMAAHC’s Office of Digitization and Cataloging maintains a written policy for location moves and has created a user’s guide for data entry.

The museum is aware that a portion of its collection records has missing or inaccurate information. The museum strives toward having 100% of its records meet the standards for Reviewed Records (defined below). However, collections often arrive at the museum with incomplete and inaccurate information. Verifying existing information, researching missing information, entering information accurately, and reviewing records takes time. The Office of Digitization and Cataloging maintains detailed documentation on how to document a record's status so that TMS users can identify the record's level in the database and report the cataloging status in quarterly updates to museum leadership. NMAAHC characterizes the object records as follows:

Shell Record: Basic acquisition documentation; usually at the collection level; location tracking is accurate; entered by Registrars; object information is to be verified

Basic Record: Basic descriptive object information; minimally searchable; usually at the item level; entered by catalogers

Cataloged Record: Meets the standards for high quality, detailed record but the record is not yet reviewed; contains verified, fully descriptive object information along with research and context; identified by “Cataloging in Process” status flag and has information in all the mandatory fields

Reviewed Record: Meets the standards for high quality, detailed record and has been reviewed by Digitization and Cataloging Team; record information may be used for internal purposes without prior approval by curators; identified by the “Internal Access” checkbox

Curatorial Approved Record: Reviewed and approved by the Curator of Record; identified by “Curator Approved” checkbox

Public Record: Reviewed, approved, and released to the public via Collection Search; identified by “Public Access” checkbox.

As the OIG noted, 38 records had missing or incomplete information in one or more fields, and five records had inaccurate information in one or more fields. However, it is noteworthy that of the missing or incomplete data in those 38 records, the most considerable gap was an object-level designation, which is not essential for accurate location tracking or identifying Tier 3 objects for inventories (because all Tier 3 objects are identified in TMS). The museum has addressed the issue of missing object-level designations that the OIG has suggested is necessary for the proper implementation of cyclical inventories. The Registrar updated all of the object-level designations in the sampled records in November 2019. In February 2020, all remaining object records with a missing object-level designation were entered as Tier2.

OIG
Comment
9

OIG Finding: An object record in the OIG sample had both incomplete and inaccurate data.

Response: Museum management acknowledges that at the time of the OIG’s sample, the object record had missing or inaccurate information, but asserts that the

OIG
Comment
10

finding does not provide the full picture about the object record and how the cataloging process functions.

The report should reflect that the object record sampled was a record “in process” and not a record that was incomplete and inaccurate. The OIG’s description of the object record for a photograph album is not accurate. The TMS object record for this item states “Cataloging in Process” (2011.155.144.7a-d, top right). When an object record status is in process, it is understood that the object record may have missing information or is not yet accurate. At the time of the OIG’s sample, the cataloger was in the process of verifying, researching, and entering accurate information into the record. In this case, the cataloger copied the basic record several times for each page of the photo album and had not yet gone back to enter some of the data.

Other records identified as incomplete or with inaccurate information within the OIG's sample can be explained because only half of the museum's records currently meet the museum's high standards for a Cataloged Record (see above), and the rest are in the process for meeting those standards. This is because many objects arrive at the museum without measurements or other documentation. The museum also collects in subject areas that can be extremely difficult to document precisely, such as the history of American slavery.

The work of collections cataloging requires resources and careful attention to detail. It takes time to measure objects accurately, to verify or research and create object documentation, write accurate descriptions, identify object types, and assign precise object names or titles. Catalogers are instructed not to enter any information into a collection cataloging record that has not been verified, so fields will remain blank until the research is finished. NMAAHC prefers to have records with fields that are blank to fields that are filled with unverified information. Additionally, as mentioned above, the status of the record is clearly identified so that the user knows if the information is verified and reliable.

It is noteworthy that of the records sampled by OIG, 99% were in the location listed in the record, 93% included a description, 97% included an object type, 98% included an object name/title, and in 95% of the records, while some information may be missing, the information in the record is accurate.

OIG Comment 11

OIG Finding: The lack of a cyclical inventory until late 2020 created unnecessary risk for the museum’s collection.

Response: Museum management respectfully disagrees that its practices placed the collection at unnecessary risk.

OIG Comment 12

The results of the audit indicate that the risk to objects being lost or stolen was minimal. As described above, NMAAHC maintains a high level of collection location control by ensuring the accuracy of object numbering, maintaining correspondent database records with the same numbering, and maintaining accurate location histories. Additionally, the museum consistently conducted spot inventories of collections over the years ranging from 0.66% of the collection to 10% of the collection. The auditors found that 99% of the object records sampled were in the location listed in the record.

Management Response to Recommendations

Recommendation 1: Conduct a cyclical inventory in accordance with the inventory plan.

Implementation schedule: Pending evaluation following the Smithsonian's COVID-19 Emergency Status.

NMAAHC planned to conduct its cyclical inventory, per the approved plan, in the fourth quarter of 2020. However, since the closure of museum facilities and restricted access by staff due to the COVID-19 Emergency Status, plans to conduct such an inventory are currently postponed. At the time of this response, NMAAHC cannot identify a timeframe to implement the inventory. We can assert this is a high priority for the Office of Collections Management, which intends to commit the resources to conduct an inventory promptly upon the reopening of museum facilities and with the sufficient return of staff.

Recommendation 2: Develop a plan, with identified resources and estimated completion dates, to ensure that all its collection records have complete and accurate information in the eight selected fields.

Implementation schedule: A plan will be written and submitted to the museum director for approval by August 31, 2020. A projected timetable to implement the plan will be evaluated following the COVID-19 Emergency Status.

NMAAHC has an established and approved Unit Digitization Plan (August 15, 2019), that identifies the resources needed to maximize the creation of full object records that can be approved and released for public access and to enhance the quality of all museum object records. To address the audit recommendation, NMAAHC will develop a work plan with estimated costs and estimated completion dates for all collection records using the baseline of total collections for the previous fiscal year. The plan would determine the time and resources necessary to ensure that each record meets the standards of a Reviewed Record, with the understanding that the plan is dependent on available funding.

Recommendation 3: Revise SD 600 to include a timeframe for when new collecting units are required to have an inventory process and plan.

Implementation schedule: Estimated Spring 2021 (following reissuance of SD 600), as modified.

We concur that collecting units should have an inventory process and plan. However, we do not concur with the recommendation to the extent it would require a specific deadline for the completion of an inventory process and plan. As this audit report rightfully acknowledges, the establishment of a new Smithsonian museum is a challenging and daunting undertaking, involving the funding, design, and construction of a new building, often including an off-site storage facility, and the hiring of professional staff to develop and manage collections, plan and prepare exhibitions, facilitate pre-opening programmatic activities, and develop and implement collections management policies, procedures, and standards tailored to the museum's mission and purpose, nature, and scope of its collections.

As the circumstances of the creation of any new Smithsonian collecting unit may greatly vary, National Collections Program (NCP) recommends the development of appropriate

OIG Comment 13

policy guidance regarding inventory processes and plans, instead of establishing an arbitrary, one-size-fits-all deadline by which new units are required to have a formal inventory process and plan. This policy guidance will be part of an anticipated greater effort, based on the revision of Smithsonian Directive (SD) 600, that NCP, working in consultation with the Office of General Counsel (OGC), will undertake to develop policy and procedure templates to guide and inform a range of collections management activities of new collecting units for use in advance of the completion and final approval of their collections management policy. These planned templates will provide standard policy and procedural guidance, which can be adapted, in consultation with NCP and OGC, at the collecting unit level, including the establishment of authorities and assignment of responsibilities.

OIG Evaluation of Management Comments

1. The Smithsonian has mischaracterized OIG's finding that nearly half (47 percent) of the 93 sampled records had incomplete and/or inaccurate data in 1 or more of 8 selected fields that are required and needed to identify and locate collection objects. Based on the results of this sample, OIG estimated that 47 percent of the museum's approximately 28,000 collection records had incomplete or inaccurate data in at least 1 of the 8 selected fields. The most frequent error was incomplete data, particularly in the object level and dimension fields. The Smithsonian is correct that OIG found that data in the location field for sampled records were accurate in all but two records.
2. OIG's conclusions are not misleading. OIG found evidence that incomplete and inaccurate data in a collection information system can increase the risk that a museum may lose an object or important historical and contextual information on objects. For example, one sampled record had inaccurate information in the location field, and museum staff were unable to locate a photo negative. Museum staff told OIG that they had determined in June 2016 that several objects in this collection could not be located.

In addition, the Smithsonian has mischaracterized our finding about incomplete and inaccurate data in eight selected fields by emphasizing the sample results for four fields that had the least amount of errors.

3. The report accurately describes OIG's finding regarding the completeness and accuracy of data in eight selected fields that are required and needed to identify and locate objects. The report does not state that all the fields in the collection records are incomplete or inaccurate. In addition, the report does not imply that museum management operates without location control systems or that those controls are working; the audit assessed only the museum's location controls in relationship to the completeness and accuracy of the data in the eight selected fields.
4. OIG did not conclude that museum operations placed collections at an unnecessary risk. Rather, OIG concluded that the museum's lack of conducting cyclical inventories creates unnecessary risk for the museum's collection considering that the museum had accumulated almost 37,000 objects in its collection since 2005. According to Smithsonian Directive 600 (SD 600), *Collections Management* (October 2001), effective collections management requires a continuous inventory system to support decisions regarding collections use, growth, storage, and security. Further, an ongoing inventory system is an essential security device to deter and detect theft of collection items.
5. The report states that the creation of a new museum—starting with no staff, building, or collection—placed a significant workload on the small staff hired to start the museum. In addition, it discusses museum staff efforts to develop draft and final policies.

6. The report acknowledges that, although NMAAHC's collection management policy had been under development since 2009, the first draft cyclical inventory plan was not developed until June 2018. OIG did review multiple draft versions of the collection management policy and observed that none of these drafts specifically addressed an inventory plan or process.
7. The report has been revised to state that no inventories as defined by the SD 600 *Implementation Manual* were conducted. This manual requires museums to maintain a copy of the completed inventory and to report the results of the inventory to the museum director. When OIG requested copies of reports for past inventories, an email was provided that listed one "full inventory" in 2013 and 11 "spot check inventories" from 2015 to 2018; no other documentation was provided. These activities may not meet the requirements for an inventory, but OIG acknowledges that these activities are important for maintaining accurate records when collection objects are moved. OIG revised the report to more fully describe these activities, rather than citing an example of them.
8. The report describes the museum's cataloging process, including the controls to help ensure accurate location data in the collection information system. The physical security of the collections is not described because it was not within the scope of the audit. The audit assessed the extent to which NMAAHC had an inventory process and plan and had accurate and complete data in eight selected fields in its collection records.

The report does not state that each of the eight selected fields is equally important for tracking location or essential for inventory. Rather, the report describes these eight fields as being required and needed to identify and locate collection objects. OIG identified these fields through discussions with NMAAHC and Smithsonian management collection officials, and a review of minimum documentation requirements in SD 600 and NMAAHC's cataloging standards. Further, OIG assessed the completeness and accuracy of data in these eight selected fields, not 100 percent of the fields in the records.

9. OIG commends NMAAHC collection management officials for prompt action to address the incomplete data in the object level field for all of its collection records. The report has been updated to reflect this recent management action.
10. OIG's description of the incomplete data in the description field for this object is accurate. OIG understands that many records are in the process of being fully cataloged. In this case, the record was created in 2011, and the OIG sample that included this record was taken 7 years later, in 2018. Under federal internal control standards, quality data are appropriate, current, complete, accurate, accessible, and provided on a timely basis.

11. The comments mention the sample results for four of the selected fields in OIG's sample that had the least amount of errors. The comments do not mention two other fields with the highest number of errors (object level and dimension).
12. OIG believes that the collections faced unnecessary risk because the museum has not conducted cyclical inventories since collecting its first object in 2005. According to the *SD 600 Implementation Manual*, a current inventory is one of the primary tools of accountability and collections management. In addition, a continuous inventory system helps to support decisions regarding collections use, growth, storage, and security and it is an essential security device to deter and detect theft of collection items.
13. Smithsonian management states that they concur with the third recommendation. However, they do not concur to the extent that the recommendation would require a specific deadline for the completion of an inventory process and plan.

The recommendation is to revise SD 600 to establish a timeframe for when new collecting units should have an inventory process and plan. The Smithsonian proposes to develop appropriate policy guidance and templates regarding inventory processes and plans, instead of establishing "an arbitrary, one-size-fits-all" deadline when new units are required to have a formal inventory process and plan. OIG did not recommend that the Smithsonian establish an arbitrary deadline for having an inventory process and plan, rather OIG believes that it is reasonable for the Smithsonian to have a period of time for when it expects a new museum to have an inventory process and plan in place. The establishment of timeframes can consider a variety of factors, such as the length of time since establishing its collection and the size of a collection. For NMAAHC, the expectation was to have its policy finalized before the museum opened in September 2016. However, OIG found that NMAAHC has been collecting objects since 2005 without an inventory plan until June 2019. In addition, the museum had not conducted any inventories as required by the *SD 600 Implementation Manual*.

Major Contributors to Report

Brian Lowe, Supervisory Auditor
Brendan Phillips, Auditor-in-Charge
Alyce Chong, Auditor

OFFICE OF THE INSPECTOR GENERAL



IG's Mission

Our mission is to promote the efficiency, effectiveness, and integrity of the Smithsonian Institution's programs and operations through independent and objective audits and investigations and to keep stakeholders fully and currently informed.

Reporting Fraud, Waste, and Abuse to OIG Hotline

OIG investigates allegations of waste, fraud, abuse, gross mismanagement, employee and contractor misconduct, and criminal and civil violations of law that have an impact on Smithsonian Institution programs and operations.

If requested, anonymity is assured to the extent permitted by law. Although you may remain anonymous, we encourage you to provide us with your contact information. The ability to gather additional information from you may be the key to effectively pursuing your allegation.

To report fraud and other serious problems, abuses, and deficiencies, you can do one of the following:

Call 202-252-0321.

Send an email to: oighotline@oig.si.edu.

Visit OIG's website: <https://www.si.edu/oig>.

Write to:

Office of the Inspector General

Smithsonian Institution

P.O. Box 37012, MRC 524

Washington, D.C. 20013-7012.

Obtaining Copies of Reports

To obtain copies of Smithsonian Institution OIG reports, go to OIG's website: <https://www.si.edu/oig> or the Council of the Inspectors General on Integrity and Efficiency's website: <https://oversight.gov>.