

ACCOUNTING FOR DISPOSITION: A COMPARATIVE CASE STUDY OF
APPRAISAL DOCUMENTATION AT THE NATIONAL ARCHIVES AND
RECORDS ADMINISTRATION IN THE UNITED STATES,
LIBRARY AND ARCHIVES CANADA, AND
THE NATIONAL ARCHIVES OF AUSTRALIA

by

Jennifer Alycen Marshall

B.S.L.S., Georgetown University, 1994

M.L.I.S., University of Pittsburgh, 1999

Submitted to the Graduate Faculty of
the Department of Library and Information Science of the
School of Information Sciences

in partial fulfillment
of the requirements for the degree of

Doctor of Philosophy

University of Pittsburgh

2006

UNIVERSITY OF PITTSBURGH
SCHOOL OF INFORMATION SCIENCES

This dissertation was presented

by

Jennifer Alycen Marshall

It was defended on

December 20, 2006

and approved by

Toni Carbo, Department of Library and Information Science

Terry Cook, Department of History, University of Manitoba

Ellen G. Detlefsen, Department of Library and Information Science

Dissertation Director: Richard J. Cox, Department of Library and
Information Science

Copyright by Jennifer Alycen Marshall
2006

ACCOUNTING FOR DISPOSITION: A COMPARATIVE CASE STUDY OF
APPRAISAL DOCUMENTATION AT THE NATIONAL ARCHIVES AND
RECORDS ADMINISTRATION IN THE UNITED STATES,
LIBRARY AND ARCHIVES CANADA, AND
THE NATIONAL ARCHIVES OF AUSTRALIA

Jennifer Alycen Marshall, PhD

University of Pittsburgh, 2006

Society delegates responsibility for the selection and preservation of records of continuing value to archivists. In accepting this charge, the archival profession enters into a relationship with society in which ensuring public trust through accounting to society for the responsible management of records becomes essential. For archivists to maintain this public trust and to be accountable for appraisal, they must create, maintain, and provide access to documentation of how this process is carried out and of why particular disposition decisions are reached. Documentation that reflects that archivists have weighed relevant legislation, institutional policies, professional best practice, and societal values during the appraisal decision-making process enables archivists to demonstrate that they have arrived at responsible decisions in their selection of records for disposal or for continued retention in archives. Appraisal documentation serves as a safeguard which ensures that disposition of records occurs according to standard procedures and protects against the arbitrary and capricious destruction of records.

This dissertation explores the relationship between appraisal documentation and archival accountability through a comparative case study of the units tasked with making disposition decisions at the National Archives and Records Administration (NARA) in the United States,

Library and Archives Canada (LAC), and the National Archives of Australia (NAA). The research developed detailed descriptions of how appraisal is documented at each of the host institutions. Using a content analysis of documentation and interviews with archivists at NARA, LAC, and NAA regarding the appraisal documentation produced by their respective institutions, the study also assessed archivists' views regarding what constitutes documentation of appraisal that is adequate to permit archivists to be held accountable for appraisal in government archives. This comparative analysis produced preliminary guidelines for accountable documentation of appraisal that serve as a starting point for future research related to archival accountability for this core professional function.

TABLE OF CONTENTS

Preface.....	x
List of Abbreviations	xii
I. Problem Statement.....	1
A. Overview of the Study	1
B. Core Concepts for the Study	2
C. Background for the Study	8
D. Hypotheses and Research Questions.....	16
E. Significance of the Study.....	17
II. Literature Review	18
A. Archival Appraisal	18
1. Birth of Appraisal Theory: Pre-1970s.....	19
2. Beyond Jenkinson and Schellenberg: 1970s-Mid-1980s.....	21
3. “The Third Way:” 1986-Present	25
4. Multiple Perspectives: Recent Appraisal Monographs.....	34
B. Archives and Accountability	38
C. Accountability in Archival Appraisal	46
D. Documentation of Archival Appraisal	50
III. Methodology	63
A. Site Selection.....	66
B. Phases of Research	68

C. Data Collection and Analysis.....	69
1. Content Analysis.....	70
2. Interviews.....	73
D. Limitations of the Study.....	74
E. Summary.....	75
IV. Appraisal Documentation at the National Archives and Records Administration in the United States (NARA).....	76
A. NARA’s Statutory Authority for Records Disposition and Appraisal.....	76
B. NARA’s Primary Contributions to Appraisal Practice	79
C. Accounting for Appraisal at NARA.....	82
1. Program-level Documentation	83
2. Initiating the Appraisal Process	85
3. Documenting Appraisal Decisions	88
4. Accountability in Appraisal	93
D. Summary	100
V. Appraisal Documentation at Library and Archives Canada (LAC).....	102
A. LAC’s Statutory Authority for Records Disposition and Appraisal.....	102
B. LAC’s Primary Contributions to Appraisal Practice.....	108
C. Accounting for Appraisal at LAC	114
1. Program-level Documentation	115
2. Initiating the Appraisal Process	118
3. Documenting Appraisal Decisions	124
4. Accountability in Appraisal	135
D. Summary	141

VI. Appraisal Documentation at the National Archives of Australia	143
A. NAA’s Statutory Authority for Records Disposition and Appraisal	143
B. NAA’s Primary Contributions to Appraisal Practice	152
C. Accounting for Appraisal at NAA	157
1. Program-level Documentation	158
2. Initiating the Appraisal Process	170
3. Documenting Appraisal Decisions	171
4. Accountability in Appraisal	174
D. Summary	178
VII. Comparative Analysis of Appraisal Documentation at NARA, LAC, and NAA	180
A. Accountability through Appraisal Documentation	180
1. Architecture of Appraisal Documentation	181
2. Availability of Appraisal Documentation	189
3. Opportunity for Public Input.....	195
B. Summary	203
VIII. Guidelines for Accountable Appraisal Documentation and Future Research Directions	206
A. Guidelines for Accountable Appraisal Documentation	206
1. General Requirements for Accountability in Appraisal Documentation	208
2. Accountability Requirements for Appraisal Documentation.....	211
B. Future Research Directions	217
C. Conclusion.....	220

Appendices.....	222
Appendix A: University of Pittsburgh Institutional Review Board Approval.....	223
Appendix B: Introduction to the Research Study	225
Appendix C: Site Authorizations	227
Appendix C-1: NARA Site Authorization.....	228
Appendix C-2: LAC Site Authorization	229
Appendix C-3: NAA Site Authorization.....	230
Appendix D: Interview Questions	231
Bibliography	233

PREFACE

This dissertation reached fruition due to the interest and support of many parties. First of all, I would like to thank my dissertation committee: Richard Cox, Toni Carbo, Terry Cook, and Ellen Detlefsen. I owe a special debt of gratitude to Richard Cox, my dissertation advisor, who challenged and inspired me throughout my doctoral studies. His conviction that research is essential to advance archivists in their mission to serve the public good provided what was at times a much-needed reminder of why it was important to complete this study. I am equally grateful to Terry Cook, whose critical reading of these chapters assisted me in refining this research. I am deeply appreciative of his suggestions regarding future research and publications resulting from this dissertation. Particular thanks go to the Provost's Development Fund at the University of Pittsburgh for providing the resources that enabled me to travel to the National Archives and Records Administration (NARA), Library and Archives Canada (LAC), and the National Archives of Australia (NAA) to conduct this research.

Most importantly, I would like to express my abiding gratitude to the archivists at NARA, LAC, and NAA who made this study possible. I remain indebted to them for giving so generously and graciously of their time to share their experience with the process of documenting appraisal and their insights about the implications of appraisal documentation for archival accountability for this central professional function. A special thank you to Susan Cummings of NARA, Judith Roberts-Moore of LAC, and Natalie Owen of NAA, who coordinated the site visits and provided invaluable assistance to me during this research.

I would also like to thank my graduate assistant, Areli Keeney, for her excellent transcription services. In addition, several graduates of the School of Library Science at the University of South Carolina provided various and sundry administrative and technical

assistance, as well as moral support, throughout the time that I was writing this dissertation. Trey Bunn, Drusilla Carter, and Gypsy Legge played no small part in the completion of this research, and I am grateful for their patience and good humor throughout this process. I am indebted to the friends who have encouraged me during the course of my research: Jennie Benford, Bernadette Callery, Kate Colligan, Michelle Darby, Donghee Sinn, and Elaine Westbrooks. I am eternally beholden to Lisa Donatelli and Tywana Whorley; as their doctoral studies coincided with my own, they have been my special companions on this journey.

Finally, I would like to express my gratitude to my family for their ongoing understanding during the lengthy course of my doctoral studies. While my entire family has supported me through this process, I dedicate this dissertation to Betty Marshall and Helen Wolfe, and to the memory of Ruth Anderson and Judith Beaty. These four extraordinary ladies, my grandmothers, contributed over the years to my love of learning. Their intellectual curiosity and belief in education has been an inspiration to me. I am truly privileged to have had them as role models.

LIST OF ABBREVIATIONS

AA	Australian Archives (1974-1983)
AFDA	Administrative Functions Disposal Authority
CAO	Commonwealth Archives Office (1961-1973)
DIRKS	Designing and Implementing Recordkeeping Systems
GRS	General Records Schedule
LAC	Library and Archives Canada (2004 – present)
NA	National Archives (1934-1948)
NAA	National Archives of Australia (1984 – present)
NAC	National Archives of Canada (1987-2003)
NARA	National Archives and Records Administration (1985 – present)
NARS	National Archives and Records Service (1949-1984)
ISDA	Institution-Specific Disposition Authority
MIDA	Multi-Institutional Disposition Authority
OPI	Office of Primary Interest
OCI	Office of Collateral Interest
PAC	Public Archives of Canada (1912-1986)
RDA	Records Disposal Authority
RDACS	Records Disposition Authority Control System

CHAPTER ONE

PROBLEM STATEMENT

Overview of the Study

Records fulfill important functions in society by providing evidence of and information about the transactions of individuals and organizations. Records provide one mechanism by which individuals, institutions, governments, and societies can be held accountable for their actions and ultimately serve as a foundation upon which public memory is constructed. The responsible management of records is thus a matter of considerable significance. Society delegates responsibility for the selection and preservation of records of continuing value to archivists. In accepting this charge, the archival profession enters into a relationship with society in which ensuring public trust through being able to account to society for the responsible management of records becomes essential.

For archivists to maintain this public trust and to be fully accountable for this core professional activity, archivists must create, maintain, and provide access to documentation of how the process of appraisal is carried out and of why particular disposition decisions are reached. Documentation that reflects that archivists have weighed relevant legislation, institutional policies, and professional best practice during the appraisal decision-making process enables archivists to demonstrate that they have arrived at responsible decisions in their selection of records for disposal or for continued retention in archives. Appraisal documentation serves as a safeguard which ensures that disposition of records occurs according to standard procedures and protects against the arbitrary and capricious destruction of records. Through documenting the legal, institutional, and professional requirements governing appraisal, archivists also fulfill

cultural and historical accountabilities by leaving evidence of how appraisal was conducted that sheds light on how a society's archives have been constructed.

This research study explores the relationship between appraisal documentation and archival accountability through a comparative case study of the units responsible for making disposition decisions at the National Archives and Records Administration (NARA) in the United States, Library and Archives Canada (LAC), and the National Archives of Australia (NAA). The first goal of this research was to develop detailed descriptions of how appraisal is documented at each of the host institutions. Using a content analysis of this documentation and interviews with archivists at NARA, LAC, and NAA regarding the appraisal documentation produced at their respective institutions as a context, the second objective of the study was to assess archivists' views regarding what constitutes documentation of appraisal that is adequate to permit archivists to be held accountable for appraisal in government archives. This dissertation provides a snapshot of practices for documenting appraisal at NARA, LAC, and NAA in the summer and fall of 2003.¹

Core Concepts for the Study

This research revolves around the concepts of appraisal and disposition, accountability, and documentation. This section explains the usage of these terms for the purposes of this study.

Appraisal: The most recent Society of American Archivists glossary defines appraisal as, "The process of identifying materials offered to an archives that have sufficient value to be accessioned."² A second meaning given for the term is, "The process of determining the length of time records should be retained, based on legal requirements and on their current and potential

¹ All three institutions were in the process of making changes to their appraisal programs at the time this research was conducted. Discussion of the anticipated modifications, some of which have since been implemented, is incorporated into Chapters Four, Five, Six, and Seven.

² Richard Pearce-Moses, *A Glossary of Archival & Records Terminology*, Archival Fundamentals Series II (Chicago: Society of American Archivists, 2005), 22.

usefulness.”³ While the glossary offers the process of determining the monetary value of records as a third definition for appraisal, that sense will not be used within the context of the study.

Appraisal is also sometimes referred to as selection or as records scheduling. This research uses “appraisal” as a broad term which denotes theories about this concept, methodologies and strategies for conducting this activity, and the decision-making process related to this function in general.

Disposition: Disposition can be defined as, “Materials’ final destruction or transfer to an archives as determined by their appraisal.”⁴ Disposition may result in the destruction of records, their continued retention, or their transfer to a more appropriate repository. The term “disposition” is employed in this study as a narrower concept than appraisal to refer to particular decisions to either dispose of or continue to maintain specific records.

Accountability: The notion of accountability can be challenging to define. This is in large part because different academic disciplines and professions have appropriated the term and assigned to it meanings particular to their own specific contexts.⁵ Thus, a central part of any productive discussion of accountability is carefully designating the context in which that conversation takes place. One archivist has described this necessity in the following terms, "Accountability has become a vogue word which needs to be defined contextually or it loses its meaning by overuse or generality. It has been used in a variety of political, constitutional, legal, financial, institutional, and sometimes ethical and moral contexts."⁶

³ Ibid.

⁴ Ibid., 124.

⁵ See Kevin P. Kearns, *Managing for Accountability: Preserving the Public Trust in Public and Nonprofit Organizations* (San Francisco: Jossey-Bass Publishers, 1996), 35-43 for a discussion of different definitions of accountability. Kearns provides an excellent analysis of the concept of accountability and its emergence as a major management concern.

⁶ Livia Iacovino, “Accountability for the Disposal of Commonwealth Records and the Preservation of Its Archival Resources: Part I – The Context,” in *Archival Documents: Providing Accountability Through*

This study adopts a multi-faceted understanding of the concept of accountability. Since national archival institutions served as the sites for this research, the overarching sense of the term within the context of this dissertation is that of public accountability. One case study of the relationship between recordkeeping and public accountability describes accountability in this sense as “the responsibilities of those entrusted with public resources to account to the owners of those public resources...on the way in which delegated management authority has been used.”⁷ This research was premised on a similar notion of accountability, in which government archivists have an obligation to account to government oversight bodies in particular and the citizenry in general for the archival resources (i.e., public records) that society has entrusted to their care and for the appraisal function which society has delegated to them.

This notion that society has delegated authority to archivists for the management of records is one possible one way of looking at the roles and responsibilities of archivists in society. This idea has been advanced by several archivists. Canadian archivist Roy Schaeffer postulates, “Archivists have...been delegated the responsibility for appraisal by society, which expects and trusts them to bring to the exercise a set of values consistent with their training, sense of social mission, and understanding of archives.”⁸ It is telling that Schaeffer makes this assertion directly after opining,

Archivists have perhaps been fortunate that...they have not as yet been called upon to answer to the community for their selection and acquisition choices or their methodologies. The fact remains that few care and fewer would think to challenge appraisal decisions, however arbitrary these may be.⁹

Recordkeeping, 55-71, ed. Sue McKemmish and Frank Upward (Melbourne: Ancora Press, 1993). The quote is taken from page 55.

⁷ Marion Renehan, “Unassailable Evidence: The Nexus Between Recordkeeping and Public Sector Accountability,” in *Archival Documents: Providing Accountability Through Recordkeeping*, 131-144, ed. Sue McKemmish and Frank Upward (Melbourne: Ancora Press, 1993). The quote is taken from page 132.

⁸ Roy C. Shaeffer, “Transcendent Concepts: Power, Appraisal, and the Archivist as ‘Social Outcast’,” *American Archivist* 55 (Fall 1992): 615.

⁹ *Ibid.*

These observations give voice to two other interrelated concerns often voiced in the archival literature: that the public does not care about records and that the work of archivists is misunderstood. This study accepts all three statements that Shaeffer makes, contending that through the documentation of archival activities, beginning with the process of appraisal, archivists possess the means to advocate for the importance of records and to promote an understanding of archivists' role as delegates entrusted with the care of the records that constitute the collective documentary heritage.¹⁰

The sense of the term accountability within the context of this research is one of providing an explanation or a rationale for the process of appraisal as conducted by archivists within particular institutions and for disposition decisions related to specific records. This differs from a current widespread perception of accountability as an act of judgment concerned with the rightness or wrongness of actions or accountability as a means of assigning blame in the midst of a controversial situation. Being accountable for explaining the process of appraisal and documenting disposition decisions is an obligation that archivists as professionals owe to the governments, organizations, and the publics which have delegated responsibility for this function to them. To be accountable for appraisal decisions entails producing and providing access to a record sufficient to provide evidence that the appraisal process has been conducted responsibly, according to relevant legislation, institutional guidelines, professional best practices, and societal expectations, as opposed to having taken place in an arbitrary or capricious manner.

¹⁰ For two other views of the archivist as the delegate of society in the management of records, see Stephen Yorke, "Great Expectations or None at All: The Role and Significance of Community Expectations in the Appraisal Function," *Archives and Manuscripts* 28:1 (May 2000): 24-37 and Randall C. Jimerson, "Embracing the Power of Archives," *American Archivist* 69 (Spring/Summer 2006): 19-32. Jimerson's description of the social responsibility of archivists in a democratic society conveys the notion that society has delegated the tasks associated with the accountable management of archives to the profession.

Documentation: One research study of appraisal documentation defines quality appraisal documentation as “the written record prepared to describe and justify a decision to preserve or not to preserve a set of records, which exists to provide the institution with the information needed to understand its decisions regarding those records.”¹¹ The current research accepts this definition with two key modifications. First, this study accepts that appraisal documentation is created and maintained to explain appraisal choices not only to the decision-making institution, but to other archival institutions, users of archives, government oversight bodies, and the public as well. Second, this research stipulates that quality appraisal documentation must be adequate to allow for archivists to be held accountable for their disposition decisions.

A premise underlying this research was that in order for appraisal documentation to provide for archival accountability, the record of this function must address several types of accountability requirements. This study suggests that, at a minimum, accountable documentation of the appraisal decision-making process should reflect that the following accountabilities have been evaluated in reaching disposition decisions:

- Legal accountability requirements, which include relevant laws and statutes related to disposal;
- Institutional accountability requirements, which include the organization’s policies, procedures, strategies, and frameworks for appraisal;
- Professional accountability requirements, which includes professional practice for appraisal and ethical standards regarding the conduct of this activity; and,
- Cultural and historical accountability requirements, which consider the importance of archival resources to a society’s collective memory.¹²

¹¹ Thomas J. Ruller, “Dissimilar Appraisal Documentation as an Impediment to Sharing Appraisal Data: A Survey of Appraisal Documentation in Government Archival Repositories,” *Archival Issues* 17:1 (1992): 66-73. The quote is taken from page 68.

¹² That accountability exists at a broad, cultural and historical level as well as at a traditional, narrow and legalistic level has been the subject of discussion in recent archival literature. See Sue McKemmish, “The Smoking Gun: Recordkeeping and Accountability,” (Paper presented at the 22nd Annual Conference of the Archives and Records Association of New Zealand, Dunedin, New Zealand, 3-5 September 1998) accessed 3 November 2006, available from <http://www.sims.monash.edu.au/research/rcrg/publications/recordscontinuum/smckp2.html> and John M. Dirks, “Accountability, History, and Archives: Conflicting Priorities or Synthesized Strands?,” *Archivaria* 57 (Spring 2004): 27-48.

These accountability requirements can be seen as an application of the warrant concept proposed in Wendy Duff's dissertation research.¹³ Duff defines warrant as a requirement specified in a society's laws, regulations, standards, customs or best practices. The accountability requirements suggested in this study as prerequisites for accountable appraisal documentation represent the warrants for appraisal decision-making embodied in legislation, institutional policy, professional literature, and public expectations for the disposition of government records.

It is perhaps not a coincidence that the warrants or requirements that this study postulates for accountability in the documentation of archival appraisal can be viewed as deriving in part from the secondary evidential and informational values which for so long dominated the conduct of appraisal in North America.¹⁴ Evidential value, consisting of the legal, fiscal, and administrative information requisite to documenting the actions of records creators, addresses the choice of archival records required to hold creating individuals or bodies responsible for their activities. Informational value, representing the research and historical value of records, could be conceived of as providing for the selection of records that permits the construction of history which would allow for a sort of cultural accountability. Thus, Schellenberg's secondary values, particularly his evidential values, established a kind of accountability structure. While over the past two decades archivists have moved away from using evidential and informational value in the conduct of appraisal, those values reflect the basis for many of the recordkeeping requirements that must be met in order to allow records creators – including archivists – to be held accountable for their actions.

¹³ The results of this research are reported in Wendy Duff, "Harnessing the Power of Warrant," *American Archivist* 61 (Spring 1998): 88-105.

¹⁴ T. R. Schellenberg of the National Archives in the United States was the most vocal proponent for the application of these values by archivists in making appraisal decisions. For his chief contributions to appraisal thinking, see T. R. Schellenberg, *Disposition of Federal Records: How to Establish an Effective Program for the Preservation and Disposal of Federal Records* (Washington: National Archives, 1949) and T. R. Schellenberg, *The Appraisal of Modern Public Records: National Archives Bulletin #8* (Washington: National Archives, 1956). Schellenberg's taxonomy of appraisal values will be discussed in more detail in Chapter Two.

Background for the Study

From ancient times, records have played vital roles in human societies. Records provide evidence of and information about the transactions of individuals and organizations, allowing them to be held accountable for their actions, and ultimately serving as the foundation upon which public memory is built. Among the records produced by society, those created by government officials in the fulfillment of their delegated responsibilities are accorded a special status.¹⁵ Public records enable government administration, facilitate delivery of services to citizens, document the rights and responsibilities of both government and citizens, provide legal documentation, serve as evidence of the government's work, and provide material for future research.¹⁶ Of considerable importance in democratic societies is the notion that the records generated by public officials are instruments of accountability. John McDonald of the National Archives of Canada has succinctly expressed the relationship between public records and government accountability, "Without records, there can be no demonstration of accountability. Without evidence of accountability, society cannot trust in its public institutions."¹⁷ Because of the significance of government records, their effective administration is a matter of great importance to society.

To ensure that public records receive the care which their unique status merits, societies developed the practice of setting aside special places to care for government records.

¹⁵ This study refers to these records as government records or public records. Public records are defined as follows: "(1) In general usage, records accumulated by Government agencies. (2) Records open to public inspection by law or custom." Definitions are taken from *A Federal Records Management Glossary* (Washington, DC: National Archives and Records Administration, 1993).

¹⁶ Bruce W. Dearstyne, *Managing Government Records & Information* (Prairie Village, KS: ARMA International, 1999): 23.

¹⁷ John McDonald, "Accountability in Government in an Electronic Age," (paper presented at the International Records Management Trust Electronic Records Seminar, Kuala Lumpur, Malaysia, 25 June 1998). This paper is no longer available through the International Records Management Trust website, but can be accessed through the Internet Archive's Wayback Machine at <http://web.archive.org/web/20010726105930/www.irmt.org/education/malpaper2.html>, accessed 3 November 2006.

Archaeological evidence suggests that as early as the fifth millennium B.C.E., repositories were designated for the keeping of records produced by public officials.¹⁸ With the establishment of the French National Archives in 1789, a modern sensibility began to emerge of the government records maintained in archival repositories as the property of a nation's citizenry. By the twentieth century, the tenets that the records held in these institutions belonged to the people and should be open to the public for examination had become well established in Western countries.¹⁹ An idealized notion of national archival institutions views these organizations as bastions of societal accountability and memory in democratic societies. In reality, national archives occasionally become targets of public criticism.²⁰ In spite of these sometimes real and sometimes perceived lapses in judgment, national archives have functioned as leaders in the development of the modern archives profession, and the theories and methodologies for managing records developed by government archivists working in these institutions have exerted a strong influence on archival practice in many organizational settings.

Government archivists perform many activities as they manage public records; foremost among the tasks delegated to archivists in the management of records is scheduling and appraisal.²¹ In this step, archivists work with government agencies to determine how long

¹⁸ Luciana Duranti, "The Odyssey of Records Managers," in *Canadian Archival Studies and the Rediscovery of Provenance*, 29-60, ed. Tom Nesmith (Metuchen, NJ: The Scarecrow Press, Inc., 1993).

¹⁹ James O'Toole, *Understanding Archives and Manuscripts*, Archival Fundamentals Series (Chicago: Society of American Archivists, 1990), 29.

²⁰ For criticism of the National Archives and Record Administration's handling of electronic records management, for example, see Thomas S. Blanton, ed., *White House E-Mail: The Top Secret Computer Messages the Reagan/Bush White House Tried to Destroy* (New York: The New Press, 1995) and David A. Wallace, "Electronic Records Management Defined by Court Case and Policy," *Information Management Journal* 35 (January 2001): 4-15. For an account that questions NARA's handling of the records of the Tuskegee Syphilis Study, see Tywana M. Whorley, "The Tuskegee Syphilis Study and the Politics of Memory," in *Archives and the Public Good: Accountability and Records in Modern Society*, 165-175, ed. Richard J. Cox and David A. Wallace (Westport, CT: Greenwood Press, 2002). See also the discussion of the controversies surrounding the FBI files in the United States and Nazi immigration records in Canada later in this chapter, as well as in Chapter Two.

²¹ Because the archives and records management professions, following the lead of the National Archives and Records Administration in the United States, diverged in the 1940s, records scheduling and archival appraisal are often discussed in the literature of their respective professions as if they were two distinct activities. This paper

records must be retained for the purposes of government business, or as commonly stated in the archival literature, for administrative, legal or fiscal reasons. Once records are no longer needed by their creating agencies, archivists must make a final decision about the disposition of records; that is, whether records merit continued maintenance and preservation in archives.

This appraisal function is among the most intellectually demanding and controversial responsibilities which archivists perform. Despite a proliferation of writings – though little empirical research – about appraisal since the 1980s, there is no universally accepted formula for conducting archival appraisal. Archivists continue to employ a variety of criteria and techniques in carrying out this function. Some favor traditional criteria, such as value and use. Others rely on the framework of an institutional collection or acquisition policy or an assessment of the risk of disposing of records. Some adopt the position that the appraising archivist’s role is to document particular events, regions, phenomena, people, or organizations in order to produce a representative image of society.²² In practice, a combination of these approaches may be used. The continuing diversity of opinion about appraisal theory and practice suggests that it is unrealistic to assume that the archival community will ever arrive at a single consensus about how to best conduct appraisal. In fact, recent volumes on the topic make the case that a single model for conducting appraisal may be neither necessary nor desirable.²³ Ultimately, perhaps, this multiplicity of professional opinion about archival appraisal will result in the formation of a richer archival record.

sees records scheduling and archival appraisal as part of the same function, and the terms are used interchangeably. For a discussion of the relationship between these activities, see Richard J. Cox, “Records Management Scheduling and Archival Appraisal,” *Records & Information Management Report* 14 (April 1998): 1-16.

²² For a sampling of the archival literature on appraisal, refer to Chapter Two.

²³ See Richard J. Cox, *No Innocent Deposits: Forming Archives by Rethinking Appraisal* (Lanham, MD: The Scarecrow Press, Inc., 2004) and Barbara Craig, *Archival Appraisal: Theory and Practice* (München: K. G. Saur, 2004), 111-112 for a recent reflection on the state of research in archival appraisal.

An important implication of these divergent views about the appraisal function is that it should be critical for archivists to document how appraisal is conducted and why disposition decisions have been reached. Since archivists bring many perspectives to the selection process, it is imperative to explain the thinking, goals, and assumptions behind the appraisal process in order to provide a record of how archives were formed. This is especially true since the archivists responsible for making appraisal decisions are, no less than other individuals, products of their own societies and times. As such, their appraisal recommendations cannot entirely escape current cultural biases and assumptions.²⁴ If archivists are to demonstrate that they have acted responsibly towards society's documentary heritage, they must leave evidence of how they have carried out this critical task. By developing standard methods of documenting the appraisal decision-making process, archivists can demonstrate accountability for the appraisal function to employing institutions, users of archival materials, and society in general for ensuring the responsible selection of the documentary record.

The preceding logical argument in favor of appraisal documentation aside, little professional literature has broached the topic of accounting for this archival function. Many possible explanations for this oversight could be proffered. It is possible that the profession has accepted the connection between records and accountability implicitly, as Jane Parkinson suggests in her Master's thesis, assuming that the documentation which they produce is sufficient to provide an account of their decisions.²⁵ Despite controversies related to appraisal in cases such as the FBI records, the Nazi immigration files, and the Heiner affair, there is evidence to suggest that archivists believe that it is unlikely that such an account for their appraisal decisions

²⁴ Hans Booms, "Society and the Formation of a Documentary Heritage: Issues in the Appraisal of Archival Sources," *Archivaria* 24 (Summer 1987): 69-107.

²⁵ Jane Parkinson, "Accountability in Archival Science" (Master's thesis, University of British Columbia, 1993): 111-112.

will ever be required, given a general lack of public interest in and understanding of archives.²⁶ Perhaps most plausibly, the few research studies focused on appraisal documentation underscore that active consideration of what is required for archivists to be accountable for this function (or for any other professional activity, for that matter) is still at a nascent stage. Or maybe as Hurley contends, archivists are unaccountable, only beginning to understand what it means to be accountable for their professional activities.²⁷

In a recent study of appraisal, archival educator Barbara Craig notes, “As the profession that specializes in the historical integrity and relevance of documents, archivists should be active and vocal exponents of accountability for our own work by and through documentation.”²⁸ A major impetus behind this dissertation research was that archivists have both a moral and logical imperative to be proactive in documenting the appraisal process and disposition decisions. From the moral perspective, archivists need to document appraisal because society has delegated this important function to them; therefore, they have an obligation to be accountable for this professional activity. This is an obligation that exists apart from whether archivists will ever be called to account for appraisal. In her Master’s thesis examining accountability and its relevance for archivists, Jane Parkinson observes, “Accountability...is a condition attached to the person who is to give account, not the person calling for it.”²⁹ The notion that the condition of being accountable can be separated from the condition of being called to account is not unique to an archival understanding of accountability. Political scientist Richard Mulgan arrives at a similar

²⁶ See Schaeffer, 615.

²⁷ Hurley, “Archivists & Accountability: A Commentary on Ethical Standards,” (June 2004, revised 2005), accessed 3 November 2006, available from <http://www.caldeson.com/RIMOS/archivists01.html>.

²⁸ Craig, 127.

²⁹ Parkinson, 10.

point, concluding that, “Accountability is not so much being called to account as the expectation of being called to account.”³⁰

Mulgan argues that critical to accountability is the existence of a relationship between two parties, a principal (or account holder) and an agent (or an accountor).³¹ Parkinson takes the position that accountability is not a relationship per se, but rather an obligation that arises out of a very particular type of relationship, that of delegation. The delegation relationship creates the obligation for the agent to account to the principal for the actions taken or the decisions made by the agent on behalf of the principal. “Only in the delegation relationship is there a bond of accountability, where the authority of the principal creates the obligation of the agent to act according to standards, and the entitlement of the principal to judge the action.”³² In the context of this dissertation, archivists are the agents who have been charged by a principal – society – to make decisions regarding which documents to select as an archival record. This relationship necessitates that archivists provide an explanation of their professional activities vis-à-vis appraisal.

If archivists are not swayed by a moral obligation to document the appraisal process and disposition decisions, perhaps the logical imperative to produce a record of their activities will carry more weight. At the dawn of the twenty-first century, accountability has become a watchword worldwide. In public and private institutions, managers and employees are being called to account for their actions by internal and external stakeholders. Accountability concerns and crises have become staples of daily news reports. Whenever the actions and decisions of

³⁰ Richard Mulgan, *Holding Power to Account: Accountability in Modern Democracies* (New York: Palgrave MacMillan, 2003): 11.

³¹ *Ibid.*, 15.

³² Parkinson, 13-16. The quote is taken from page 15.

organizations and individuals are called into question, records provide instruments of accountability.³³

In this climate of acute concern for accountability, government archivists need to place a high priority on ensuring that they can be held accountable for their management of public records, beginning with their appraisal responsibilities. Archivists might feel that there is little public interest in records, and thus only a remote possibility that they will be called to account for their professional responsibilities, but in point of fact, archival institutions have not been exempt from growing societal concerns about accountability. In the past few decades, government archives in several countries have been required to justify disposition decisions. In the United States, concern over what some constituents considered an inappropriate disposal of records of the Federal Bureau of Investigation prompted a court case in the early 1980s. In the mid-1980s, a special commission investigated allegations of improper records destruction by the Public Archives of Canada which critics charged might have shed light on an investigation by the Canadian government of the possible illegal entry of Nazi war criminals into Canada after World War II. And in Australia in the early 1990s, questions were raised about whether the Queensland archivist had knowingly approved the disposal of records that were the object of pending litigation. In each of these cases, documentation of the appraisal process was instrumental in demonstrating that these decisions had been made responsibly, in accordance

³³ See Stanton A. Glantz, *The Cigarette Papers* (Berkeley, University of California Press, 1996); Athan G. Theoharis, *A Culture of Secrecy: The Government Versus the People's Right to Know* (Lawrence, KS: University of Kansas Press, 1998); Eileen Welsome, *The Plutonium Files: America's Secret Medical Experiments in the Cold War* (New York: Dial Press), 1999; Edwin Black, *IBM and the Holocaust: The Strategic Alliance Between Nazi Germany and America's Most Powerful Corporation* (New York: Crown Publishers, 2001); Richard J. Cox and David A. Wallace, eds., *Archives and the Public Good: Accountability and Records in Modern Society* (Westport, CT: Greenwood Press, 2002); and, Margaret Procter, Michael G. Cook, and Caroline Williams, eds., *Political Pressure and the Archival Record* (Chicago: Society of American Archivists, 2005).

with relevant legislation, institutional policies and procedures, and professional best practice for archival appraisal.³⁴

The FBI and Nazi immigration records cases and the Heiner affair highlight public expectations that government records will be managed responsibly by the archival institutions entrusted with their care. These cases belie the contention of one archivist that, “the community at large has no expectations about records or at best has very little interest in records.”³⁵ What these cases indicate is not a lack of interest in records, but a lack of public understanding of archival appraisal, and thus the need to make this process more open and transparent. In separate examinations, Richard Cox and Terry Cook have suggested that one means by which to make archival activities more transparent – and thus less mysterious to non-archivists – is for archivists to document the decisions they make in their professional capacity, beginning with the process of appraisal.³⁶ Cox elaborates,

I suggest that *all* archivists must be keepers of the past, in terms of ensuring that records with all of their values for memory, evidence, and accountability are protected, defended, and fought for as strenuously as we are all able. And keeping the past includes documenting ourselves and our work so that the researchers in archives can better understand what they are examining and so that

³⁴ See James Gregory Bradsher, “The FBI Records Appraisal,” *Midwestern Archivist* 13:2 (1988): 51-66; Susan D. Steinwall, “Appraisal and the FBI Files Case: For Whom Do Archivists Retain Records?,” *American Archivist* 49 (Winter 1986): 52-62; Robert J. Hayward, “‘Working in Thin Air’: Of Archives and the Deschênes Commission,” *Archivaria* 26 (Summer 1998): 122-136; Terry Cook, “‘A Monumental Blunder’: The Destruction of Records on Nazi War Criminals in Canada,” in *Archives and the Public Good: Accountability and Records in Modern Society*, 37-65, ed. Richard J. Cox and David A. Wallace (Westport, CT: Greenwood Press, 2002); and Chris Hurley, “Records and the Public Interest: The ‘Heiner Affair’ in Queensland, Australia,” in *Archives and the Public Good: Accountability and Records in Modern Society*, 293-317, ed. Richard J. Cox and David A. Wallace (Westport, CT: Greenwood Press, 2002).

³⁵ Yorke, 31. Yorke argues that if the community does have any expectations of appraisal, it is in the general sense that because the public has delegated responsibility for appraisal to the archival profession, it expects that “the ‘right’ outcomes of an appraisal process will occur without the community understanding the actual process or making any real input to the decision,” p. 33.

³⁶ Richard J. Cox, “The Concept of Public Memory and Its Impact on Archival Public Programming,” *Archivaria* 36 (Autumn 1993): 122-135 and Terry Cook, “Remembering the Future: The Role of Archives in Constructing Social Memory,” unpublished paper presented at the Sawyer Seminar on Archives, Documentation, and the Institutions of Social Memory, Ann Arbor, MI, January 31, 2001.

archivists themselves are accountable to the creators and users of records and all of society that depends on these records for many purposes.³⁷

This is especially true for archival appraisal, in order for the profession to dispel public perception that “records destruction is illegal and just plain bad...[which] influences the public’s reactions to decisions by archivists, museum curators, librarians, and historic preservationists to preserve and, by implication, to destroy as well...”³⁸ Such negative impressions have the potential to adversely impact public support of archives and other cultural heritage institutions.

Hypotheses and Research Questions

The chief premise underlying this research is: Documentation of appraisal is critical in enabling archivists to demonstrate accountability for disposition decisions. Several interrelated propositions are central to this research. First, this study adopts the position that society has delegated responsibility for appraisal to the archival profession. Consequently, through accepting this delegation, archivists take on moral and legal imperatives to account for this activity. This accountability relies to a large degree on thorough and adequate documentation of the appraisal process in general and disposition decisions in particular. Finally, archivists need to become more cognizant of their documentation of appraisal in order to assess its ability to explain both how appraisal is conducted and why disposition decisions are reached.

Two research questions are addressed in relation to the appraisal documentation produced by the National Archives and Records Administration, Library and Archives Canada, and the National Archives of Australia:

Question 1: How is appraisal documented in each institution?, and,

Question 2: What constitutes documentation of appraisal that is adequate to permit archivists to be held accountable for appraisal of public records?

³⁷ Cox, *No Innocent Deposits*, 249-250.

³⁸ *Ibid.*, 263.

Significance of the Study

Government archivists recognize the role that archives play in safeguarding public accountability and strive to provide society with a record that documents the activities of government officials and agencies. Thus, it is ironic that few studies have investigated the documentation that archivists themselves create in their professional capacities. Archivists have stressed the importance of documenting individuals, organizations, and societies, but have poorly documented their own functions. This lack of documentation perpetuates public misconceptions or lack of understanding about archives and the professional functions of archivists.

The dissertation intends to encourage research into the documentation of archival functions, beginning with an analysis of appraisal documentation. The study examines how archivists at NARA, LAC, and NAA document the appraisal decision-making process and specific disposition decisions in order to explore the connections between appraisal documentation and accountability and to demonstrate how comprehensive documentation of the appraisal process and disposition decisions contributes not only to responsible appraisal, but also to greater openness and transparency in this important archival function.

This study postulates that there is a critical relationship between documentation of the appraisal process and disposition decisions and the demonstration of accountability for appraisal. Documentation was approached as the means by which archivists demonstrate that they have appraised public records responsibly. Since little research about appraisal documentation exists, this dissertation was intended to provide a baseline against which the archival community could examine the correlation between the documentation of appraisal and professional accountability for this activity. This dissertation serves as an initial attempt to articulate guidelines for open and transparent documentation of appraisal in government archives.

CHAPTER TWO

LITERATURE REVIEW

This chapter explores the core concepts relevant to this dissertation research. It examines professional literature about archival appraisal, archives and accountability, accountability in archival appraisal, and accounting for appraisal through documentation. Together, these areas provide a context for this study.

Archival Appraisal

Archival appraisal, or selection, is at the heart of all work carried out by archivists. Bruce Wilson of the National Archives of Canada (now Library and Archives Canada) has argued that “appraisal is the most significant archival function: appraisal determines what an archives acquires and if what it acquires is not of the first significance, no amount of control, conservation, and public service can rectify that situation.”¹ While appraisal is fundamental to archival work, professional understanding regarding this function was long underdeveloped. Since the 1980s, however, writings in this area have proliferated, with appraisal becoming the focus of increased thinking within the international archival community, though research studies in this area remain rare.² The importance of appraisal was affirmed in 1986 by the Society of American Archivists’ (SAA) Task Force on Goals and Priorities (GAP), which stated that, “The selection of records of enduring value is the archivist’s first responsibility. All other archival activities hinge on the ability to select wisely.”³ In 1991, the Association of Canadian Archivists designated archival appraisal as the topic of its annual meeting. In Australia, discussions of

¹Bruce Wilson, “Systematic Appraisal of the Records of the Government of Canada at the National Archives of Canada,” *Archivaria* (Fall 1994): 220.

² See Barbara Craig, *Archival Appraisal: Theory and Practice* (München: K. G. Saur, 2004), 111-112 for a recent reflection on the state of research in archival appraisal.

³ *Planning for the Archival Profession: A Report of the SAA Task Force on Goals and Priorities* (Chicago: Society of American Archivists, 1986), 8.

appraisal took place throughout the 1990s within the context of a standard for recordkeeping requirements, the development of which was prompted by concern about archivists' ability to manage the proliferation of electronic records. This portion of the literature review traces the evolution of appraisal theory and practice within the archival community as a background for understanding appraisal practices at the National Archives and Records Administration (NARA), Library and Archives Canada (LAC), and the National Archives of Australia (NAA). Current appraisal practices at each institution will be discussed in Chapters Four, Five, and Six of this dissertation.

Birth of Appraisal Theory: Pre-1970s

When practices for the administration of modern archives began to emerge in the late nineteenth and early twentieth centuries, the concept of appraisal did not exist.⁴ In the first instance, records were perceived to have value solely for their creators. Further, the volume of records had not yet reached a critical mass at which records creators routinely disposed of documents that were no longer needed. By the mid-twentieth century, however, two modes of thought had come to dominate discussions of appraisal. These different schools have been most closely associated with their initial proponents, Sir Hilary Jenkinson of the Public Records Office in Great Britain and Theodore Schellenberg of the National Archives in the United States.⁵

Jenkinson first articulated his position regarding archivists and the appraisal of records in 1922 in a volume on archival administration. He firmly believed that the responsibility for the selection of records to be preserved in archives belonged to the records creator, not to archivists or historians. Records creators were to select records for preservation based on business needs,

⁴ Roy C. Shaeffer, "Transcendent Concepts: Power, Appraisal, and the Archivist as 'Social Outcast'," *American Archivist* 55 (Fall 1992): 610.

⁵ For an examination of these schools of thought with regard to the role of archivists in appraisal, see Reto Tschan, "A Comparison of Jenkinson and Schellenberg on Appraisal," *American Archivist* 65 (Fall/Winter 2002): 176-195.

rather than with any view to maintaining historical evidence. In this way, Jenkinson believed that an impartial archival record could be created which would serve the purposes of Truth. It was the task of the archivist to see to the “moral defense of archives;” that is, to protect the archives as evidence. For the archivist to become involved in the appraisal of records would compromise the impartiality of the archival record, and hence its value as evidence.⁶ Jenkinson’s influence on appraisal theory is still seen in the writings of neo-Jenkinsonian archival theorists.⁷

In the United States, a different concept of the role of the archivist in appraisal developed. Schellenberg articulated a detailed taxonomy of values inherent in records, which derived from the uses to which the records were put.⁸ Archivists were to appraise records based upon the values inherent in them. He distinguished between two main types of values: primary and secondary. Primary values were those associated with the uses for which records were originally created. He further subdivided primary values into legal, fiscal, and administrative values. In Schellenberg's schema, it was chiefly the secondary values with which archival appraisal was concerned, since records did not become archival until they were no longer needed by their creators for legal, fiscal or administrative purposes. Like primary values, secondary values were further subdivided into other values: evidential and informational. Evidential values were defined as those which documented the organization of the records creator and its functions; informational values, on the other hand, were conceived more broadly and related to such things as

⁶ Hilary Jenkinson, *A Manual of Archive Administration* (Oxford: Clarendon Press, 1922).

⁷ Archival educator Luciana Duranti of the University of British Columbia has been a primary proponent of a neo-Jenkinsonian approach to appraisal. See Luciana Duranti, “The Concept of Appraisal and Archival Theory,” *American Archivist* 57 (Spring 1994): 328-344. See Frank Boles and Mark A. Greene, “Et Tu Schellenberg? Thoughts on the Dagger of American Appraisal Theory,” *American Archivist* 59 (Summer 1996): 298-310 for a response to Duranti’s article.

⁸ For Schellenberg's chief contributions to appraisal thinking, see T. R. Schellenberg, *Disposition of Federal Records: How to Establish an Effective Program for the Preservation and Disposal of Federal Records* (Washington: National Archives, 1949) and T. R. Schellenberg, *The Appraisal of Modern Public Records: National Archives Bulletin #8* (Washington: National Archives, 1956).

people with whom the records creator interacted and activities in which the organization was involved. It is difficult to over emphasize the impact of Schellenberg's writings on appraisal theory and practice in the United States. In his study of appraisal, American archivist Frank Boles writes, "So influential was Schellenberg's work that for almost 20 years research on the topic virtually stopped."⁹ After half a century, Schellenberg's pioneering works continue to exert a considerable influence on professional attitudes towards this function.¹⁰

Beyond Jenkinson and Schellenberg: 1970s – Mid-1980s

While the positions espoused by Jenkinson and Schellenberg have become an integral part of the archival community's intellectual framework for understanding appraisal, discussion of this core professional function has grown beyond these early modes of thinking. In the 1970s, archivists from outside government settings became actively involved in considering issues related to appraisal for the first time. In the United States, the Society of American Archivists (SAA) responded to the heightened professional interest in appraisal with the publication of its first manual on the subject.¹¹ As the appraisal literature of the 1940s and 1950s had reflected a codification of appraisal theory and practice at the National Archives in the United States, so this initial SAA manual represented a codification of thinking about appraisal theory and practice during the 1960s and 1970s. Among the primary contributions of this manual was that it brought appraisal practices from organizations outside of the Federal government setting into the

⁹ Frank Boles in Association with Julia Marks Young, *Archival Appraisal* (New York: Neal-Schuman Publishers, Inc., 1991), 6.

¹⁰ See Anne Jervois Gilliland-Swetland, "Development of an Expert System for Archival Appraisal of Electronic Communications: An Exploratory Study," (Ph.D. diss., University of Michigan, 1995), 88. In the citation analysis conducted as part of this research, Gilliland-Swetland identifies Schellenberg as the most frequently cited authority in the area of archival appraisal. This finding is of particular interest, considering that Schellenberg died in 1970 and published his last major work on the subject of appraisal in 1956.

¹¹ Maynard J. Brichford, *Archives and Manuscripts: Appraisal and Accessioning*. SAA Basic Manual Series (Chicago: Society of American Archivists, 1977).

professional discussion of this function. Also significantly, the Brichford manual addressed the issue of appraisal from "a perspective that went beyond the concerns of a particular institution or environment," unlike most previous writings on the topic.¹² Almost thirty years after its publication – and after the appearance of a second SAA manual on appraisal in 1993 – this early manual continues to serve as a reference for many archivists.¹³ It would be informative to assess whether the recently released third SAA manual on archival appraisal will have any impact on the frequency with which this early appraisal text is cited.¹⁴

The single-most important contribution to the development of appraisal thought in the 1970s was F. Gerald Ham's 1974 presidential address to the Society of American Archivists, wherein he reflected on the current state of appraisal theory and practice in the United States.

Ham began his much quoted speech as follows:

Our most important and intellectually demanding task as archivists is to make an informed selection of information that will provide the future with a representative record of human experience in our time. But why must we do it so badly? Is there any other field of information gathering that has such a broad mandate with a selection process so random, so fragmented, so uncoordinated, and even so often accidental?¹⁵

Ham's statements reflected a growing sense among some archivists, driven in part by the social history movement of the 1960s and 1970s, of the inadequacy of current methods of archival

¹² Boles, *Archival Appraisal*, 7.

¹³ Anne Gilliland-Swetland's citation analysis designates the 1977 manual as the third most cited work on archival appraisal; only Schellenberg's writings were cited more frequently during the period covered by this citation analysis. See Gilliland-Swetland, "Development of an Expert System," 88. The second SAA manual on appraisal is F. Gerald Ham, *Selecting & Appraising Archives & Manuscripts*, Archival Fundamentals Series (Chicago: Society of American Archivists, 1993).

¹⁴ The most recent SAA manual on appraisal is Frank Boles, *Selecting & Appraising Archives & Manuscripts*, Archival Fundamentals Series II (Chicago: Society of American Archivists, 2005). The Boles manual will be considered later in this literature review.

¹⁵ This address was published the following year as F. Gerald Ham, "The Archival Edge," *American Archivist* 38 (January 1975): 5.

appraisal.¹⁶ Ham's remarks served as a catalyst which reinvigorated writing in the area of archival appraisal into the 1980s.

The early to mid-1980s witnessed a growth of appraisal research which advocated collection management, collection analysis, and collection policies as tools with which to improve the quality of the archival record. During these years, several archives initiated collection analysis projects in order to identify their current collection strengths and weaknesses and plan for future collection development.¹⁷ Borrowing from the library literature on collection management, Jutta Reed-Scott proposed that systematic, comprehensive collection management programs could serve as a strategy for archivists in building stronger archival collections.¹⁸ At the same time, Faye Phillips introduced a detailed model for collection policies for manuscript repositories, noting that this outline could be adapted for use in other types of archival institutions.¹⁹

At roughly the same time that Phillips was articulating guidelines for collecting policies, Frank Boles and Julia Marks Young were engaged in constructing a model which would ultimately identify institutional policy as one of several interconnected variables in the appraisal decision-making process.²⁰ The Boles and Young model is comprised of three complementary

¹⁶ Ham notes, for example, that in 1970 historian Howard Zinn had "told an SAA audience that the archival record in the United States is biased towards the rich and powerful elements in our society -- government, business, and the military -- while the poor and impotent remain in archival obscurity." Cited in "The Archival Edge," 5.

¹⁷ For a full description of the collection analysis process, see Gloria A. Thompson, "From Profile to Policy: A Minnesota Historical Society Case Study in Collection Development," *The Midwestern Archivist* 13:2 (1983): 29-39 ; Judith E. Endelman, "Looking Backward to Plan for the Future: Collection Analysis for Manuscript Repositories," *American Archivist* 50 (Summer 1987): 340-355, and Christine Weideman, "A New Map for Field Work: Impact of Collections Analysis on the Bentley Historical Library," *American Archivist* 54 (Winter 1991): 54-60.

¹⁸ See Jutta Reed-Scott, "Collection Management Strategies for Archivists," *American Archivist* 47 (Winter 1984): 23-29.

¹⁹ Faye Phillips, "Developing Collecting Policies for Manuscript Collections," *American Archivist* 47 (Winter 1984): 30-42. Since this initial article, Phillips has demonstrated how collecting policies can be adapted for use with congressional papers. See Faye Phillips, "Congressional Papers: Collection Development Policies," *American Archivist* 58 (Summer 1995): 258-269.

²⁰ Boles and Young, "Exploring the Black Box."

categories of criteria which are important in the appraisal decision making process: value-of-information, costs-of-retention, and implications-of-the appraisal recommendations. Upon the basis of this three-pronged model, Boles and Young subsequently conducted one of the few clearly defined, systematic research projects that has been undertaken in the area of archival appraisal. This research involved the participation of fourteen archival institutions, and attempted to develop a numerical system which archivists could employ when making selection decisions. This pilot effort yielded valuable information about the appraisal decision-making process.²¹ Canadian archival educator Carol Couture credits this research with proposing “a possibly definitive appraisal theory” that synthesizes the thinking of American and European archivists about archival appraisal.²² In practice, however, the work developed by Boles and Young may be more useful as a codification of archival appraisal through the 1980s than as a scientific construct for conducting this activity.²³

Writings about appraisal through the mid-1980s shared several significant characteristics. Research about archival appraisal tended to be descriptive rather than analytical. This literature focused predominately on the articulation of appraisal criteria and the practice of appraisal at particular institutions (generally that of the author of the archives under consideration in a given article). Terry Cook, then with the National Archives of Canada, has assessed the prevailing view of appraisal during this period as “taxonomic,” entailing:

[A] systematization of various "values" of records (such as evidential and informational; administrative, legal, and fiscal; primary and secondary) and of various characteristics relating to records (their uniqueness, age, authenticity, manipulability, time span, extent, etc.). Within this "values" framework, archivists since Schellenberg have in effect appraised in a circular fashion: they have studied certain collections of records, determined that certain of the above

²¹ For a detailed account of the Boles and Young study, see Boles, *Archival Appraisal*.

²² Carol Couture, “Archival Appraisal: A Status Report,” *Archivaria* 59 (Spring 2005): 96-97.

²³ In fact, Frank Boles offers this assessment of the experiment in the most recent SAA manual on appraisal: “Put candidly, it didn’t work very well.” See Boles, *Selecting & Appraising*, 97-98, fn 1.

values and characteristics were found in them, codified these as appraisal criteria, and subsequently applied these same criteria to other groupings of records, in isolation, series by series, medium by medium, usually as these records have been made available to archivists at the end of their period of active administrative use.²⁴

The notable contributions of Ham aside, the major premise underlying the descriptive, taxonomic appraisal literature of this era is that current appraisal practice produced an adequate documentary record.

Several secondary assumptions are inherent in this overarching premise. First and foremost, appraisal is seen to be a physical and practical exercise, rather than an intellectual and conceptual process.²⁵ This understanding leads to its own set of assumptions, such as that selection necessarily involves an examination of actual records, to which various criteria are applied in the appraisal decision making process. In this scheme of things, records are assigned various types of value which appraising archivists are presumed to recognize when they see them. While these assumptions have not entirely disappeared from the literature about archival appraisal, more archivists have begun to assess this professional function systematically and critically.

“The Third Way:” 1986 - Present

The fruit of professional thinking about archival appraisal during the era ushered in by Ham in the 1970s was the emergence of a re-conceptualization of the aim of this activity being not to serve the needs of records creators or the users of these documents, but to produce an archival record reflective of the values of society as a whole. The majority of debate about

²⁴ Terry Cook, "Mind Over Matter: Towards a New Theory of Archival Appraisal," in *The Archival Imagination: Essays in Honour of Hugh A. Taylor*, 38-70, ed. Barbara L. Craig (Ottawa: Association of Canadian Archivists, 1992). The quote is taken from page 41.

²⁵ F. Gerald Ham has characterized this attitude as a “nuts-and-bolts” mentality. See Ham, “The Archival Edge,” 7.

appraisal from the mid-1980s through the present represents a profound shift from traditional, bottom-up methods of conceptualizing archival appraisal. Between 1986 and the present, several top-down methodologies for conducting appraisal have been proposed: documentation strategies, institutional functional analysis, macro-appraisal, the PIVOT Project strategy, and functional appraisal. These methods grew out of separate efforts of archivists working around the world, but subsequent dialogue in the archival literature has demonstrated that these strategies share salient characteristics. Most importantly, all of these methodologies employ a top-down, research-based approach to appraisal. The fundamental goal for archivists using such strategies is to determine where the richest documentation should be located prior to the examination of actual records. In other words, instead of first asking *what documentation should be saved*, these approaches begin the appraisal decision-making process with careful research and analysis to determine *what should be documented*.²⁶ One Australian archivist has noted, “Macro-appraisal has been called ‘the third way’ – i.e., an alternative to Jenkinson’s emphasis on the record creator’s business criteria and Schellenberg’s emphasis on the record user’s informational and research criteria – an alternative which combines them both by focusing on the values of society at large.”²⁷

In addition to reflecting the profession’s emerging concern with selecting a documentary record that captures society’s values, these strategies for appraising contemporary records grew out of what some archivists perceived as the failure of traditional appraisal criteria to address the unique challenges posed by modern documentation, organizations, and societies. These archivists have suggested that contemporary documentation differs from that of the past in

²⁶ Terry Cook, "Mind Over Matter," 47.

²⁷ Michael Piggott, “Appraisal – The State of the Art,” (Paper delivered at a professional development workshop presented by ASA South Australia Branch, March 26, 2001), accessed 3 November 2006, available from <http://www.archivists.org.au/sem/misc/piggott.html>.

significant ways. First, the emergence of new technologies has sparked an explosion in the sheer abundance of records.²⁸ Second, modern institutions are increasingly complex, and today's organizations frequently restructure. Third, the increasingly complex relationships among and within modern organizations have rendered consideration of the records of isolated records creators unfeasible. Because of increased inter- and multi-institutional collaboration, today's records often can be understood only in conjunction with each other. This complex web of relationships has resulted in large-scale duplication of documentation. Finally, documentary forms themselves are changing. In addition to the issues posed by the proliferation of electronic records, there are an increasing number of non-textual documentary materials to be appraised. For many evolving record formats, it is crucial for archivists to become active in records management issues, including involvement in decisions about a record's ultimate disposition or retention, early in the life cycle of the record, or even at the level of systems design, before records are created. Increasingly, the archival literature reflects that these transformations require archivists to rethink previous appraisal theories and practices, shifting the emphasis from examination of physical records to a consideration of the context, functions, and recordkeeping systems in which documents are produced, as well as to research about records creators and the process of records creation.²⁹

²⁸ Concern about appraising large volumes of records is hardly new in the archival literature. For over forty years, some archivists have advocated sampling as a selection tool. See, for example, Paul Lewinson, "Archival Sampling," *American Archivist* 20 (October 1957): 291-312; Frank Boles, "Sampling in Archives," *American Archivist* 44 (Spring 1981): 125-30; and Terry Cook, "'Many Are Called But Few Are Chosen': Appraisal Guidelines for Sampling and Selecting Case Files," *Archivaria* 32 (Summer 1991): 25-50.

²⁹ Comments about the changing nature of documentation are derived primarily from the following sources: Terry Cook, "Mind over Matter," Richard J. Cox, "The Documentation Strategy and Archival Appraisal Principles: A Different Perspective," *Archivaria* 38 (Fall 1994): 11-37; F. Gerald Ham, "Managing the Historical Record in an Age of Abundance," *American Archivist* 47 (Winter 1984): 11-22; and Helen Samuels, *Varsity Letters: Documenting Modern Colleges and Universities* (Metuchen, NJ: The Scarecrow Press, Inc. and the Society of American Archivists, 1992).

The first top-down appraisal methodology to be discussed in the archival literature, the documentation strategy, grew out of the work of Helen Samuels, at that time an archivist at the Massachusetts Institute of Technology.³⁰ This approach argues that appraisal is best undertaken as a cooperative, multi-institutional effort among archivists, records creators, and users of records. A documentation strategy can be developed for an issue, activity, or geographic area. In formulating a documentation plan, the documentation group must consider the existing universe of documentation related to the area under consideration and particular problems and obstacles in documenting the phenomenon. It is important to note that documentation strategies are ongoing efforts, and that the documentation group must regularly reassess, and if necessary, revise, the initial documentation plan.³¹ Critics of the documentation strategy have argued that while the documentation strategy approach might be helpful in assisting archivists to re-conceptualize the appraisal function, it has failed as a practical construct. They maintain that this

³⁰ Helen Willa Samuels, "Who Controls the Past," *American Archivist* 49 (Spring 1986): 109-121. While the concept of documentation strategies was introduced at a 1984 session of the Society of American Archivists' Annual Meeting, this article marked the first widespread dissemination of the approach to the larger archival community. Some years later, Terry Cook characterized the documentation strategy as, "The single most important North American contribution to a growing debate on appraisal theory, strategy, and methodology." See Terry Cook, "Documentation Strategy," *Archivaria* 34 (Summer 1992): 181.

³¹ In the decade after its emergence, this concept engendered an extensive literature. The following writings represent some of the available thinking on the approach. For documentation strategy models, see Philip N. Alexander and Helen W. Samuels, "The Roots of 128: A Hypothetical Documentation Strategy," *American Archivist* 50 (Fall 1987): 518-531 and Larry J. Hackman and Joan Warnow-Blewett, "The Documentation Strategy Process: A Model and a Case Study," *American Archivist* 50 (Winter 1987): 12-47. For reports on experimental documentation strategies, see Richard J. Cox, "A Documentation Strategy Case Study: Western New York," *American Archivist* 52 (Spring 1989): 192-200; *A Heritage at Risk: The Proceedings of the Evangelical Archives Conference* July 13-15, 1988 (Wheaton, IL: Billy Graham Center, Wheaton College, 1988); and Timothy L. Ericson, "To Approximate June Pasture: The Documentation Strategy in the Real World," *Archival Issues* 22:1 (1997): 5-20. For an analysis of the impact of documentation strategies on archival practice, see Jennifer A. Marshall, "Documentation Strategies in the Twenty-First Century?: Rethinking Institutional Priorities and Professional Limitations," *Archival Issues* 23:1 (1998): 59-74. Finally, for a detailed argument for the viability of the archival documentation strategy, see Richard J. Cox, *Documenting Localities: A Practical Model for American Archivists and Manuscript Curators* (Metuchen, N.J.: Scarecrow Press, 1996).

approach is too costly and time consuming, and places too heavy an emphasis on inter-institutional collaboration, to the detriment of individual institutional priorities and realities.³²

A methodology closely related to documentation strategy is institutional functional analysis, also introduced by Helen Samuels.³³ Institutional functional analysis involves the identification of an institution's primary functions, and the subsequent breakdown of each function into its component activities. In this exercise, the archivist explores what sorts of documentation are necessary to represent the most important functions and activities fully and determines where within the organization this documentation is created. The archivist then targets selection efforts, based on the mission and goals of the institution. Samuels focuses on functions to guide the appraisal process because the core functions of an institution are presumed to change less frequently than its organizational structure. Although *Varsity Letters* presented an analysis of the documentary needs of modern colleges and universities, Samuels intended it to serve as a framework that could be adapted for use in other settings.³⁴

³² For articles critical of the documentation strategy, see Terry Abraham, "Collection Policy or Documentation Strategy: Theory and Practice" *American Archivist* 54 (Winter 1991): 45-52 and Terry Abraham, "Documentation Strategies: A Decade (or More) Later," (Paper delivered at the annual meeting of the Society of American Archivists, Washington, DC, 21 August 1995), accessed 3 November 2006, available from <http://www.uidaho.edu/special-collections/papers/docstr10.htm> and Frank Boles, "Mix Two Parts Interest to One Part Information and Appraise Until Done: Understanding Contemporary Record Selection Processes," *American Archivist* 50 (Summer 1987): 356-369.

³³ See Helen Samuels, *Varsity Letters*. Her concept of institutional functional analysis grew out of previous efforts to understand the processes involved in documenting the fields of science and technology. See Clark A. Elliott, ed., *Understanding Progress as Process: Documentation of the History of Post-War Science and Technology in the United States – Final Report of the Joint Committee on Archives and Technology* (Chicago: The Society of American Archivists, 1983), and Joan K. Haas, Helen Willa Samuels, and Barbara Trippel Simmons, *Appraising the Records of Modern Science and Technology: A Guide* (Cambridge, MA: Massachusetts Institute of Technology, 1985).

³⁴ Two years after the release of *Varsity Letters*, an in-depth function-based examination of the United States Health Care System appeared. See Joan D. Krizack, ed., *Documentation Planning for the U.S. Health Care System* (Baltimore: The Johns Hopkins University Press, 1994). The approach adopted in this volume focuses on the internal analysis of an institution's records, but suggests that the documentation of an additional layer – that of a system of similar institutions – should also be considered in making appraisal decisions. Therefore, documentation planning might best be described as a cross between an institutional functional analysis and a documentation strategy.

A third – and perhaps the most far-reaching – top-down approach to appraisal was pioneered at the National Archives of Canada, with Terry Cook as its initial proponent.³⁵ Macro-appraisal effectively shifts the emphasis of appraisal from records themselves to records creators and records creating processes. The aim of macro-appraisal is to create an image of society which will represent its most significant features. This image is achieved by integrating function, equated with the purpose or intent of the records creator, with structure, which represents the actual records creator. Unlike the institutional functional analysis proposed by Samuels and the functional appraisal advocated by the National Archives of Australia, however, macro-appraisal accords primacy of place to organizational structure rather than function. Cook points out that records are produced through the interaction of function and structure with clients and argues that, “It is at these points of sharpest *interaction* that the best documentary evidence will be found.”³⁶ Macro-appraisal transformed appraisal practice at the National Archives of Canada over the past fifteen years, as evidenced in a growing volume of professional literature.³⁷

³⁵ For Terry Cook’s articulation of macro-appraisal see: “An Appraisal Methodology: Guidelines for Performing an Archival Appraisal,” (Government Archives Division, National Archives of Canada, 31 December 1991, typescript); “Mind over Matter,” 38-70 ; “Macro-appraisal: The New Theory and Strategy for Records Disposition at the National Archives of Canada.” (paper presented at the annual conference of the Society of American Archivists, Washington, DC, September 1995), 1-11; “What is Past is Prologue: A History of Archival Ideas Since 1898 and the Future Paradigm Shift,” *Archivaria* 43 (Spring 1997): 17-63; and “Macro-appraisal and Functional Analysis: Documenting Governance Rather than Government,” *Journal of the Society of Archivists* 25:1 (2004): 5-18; and “Macroappraisal in Theory and Practice: Origins, Characteristics, and Implementation in Canada, 1950-2000,” *Archival Science* 5 (December 2005): 101-161.

³⁶ Cook, “Mind over Matter,” 50.

³⁷ Writings about macro-appraisal can be classified into three categories based upon the evolution of this strategy within Library and Archives Canada. For what might be considered a “first round” of writings on macro-appraisal at the then National Archives of Canada, see Richard Brown, “Macro-Appraisal Theory and the Context of the Public Records Creator,” *Archivaria* 40 (Fall 1995): 121-142; Jean-Stéphan Piché, “Macro-appraisal and Duplication of Information: Federal Real Property Management Records,” *Archivaria* 39 (Spring 1995): 39-50; Sheila Powell, “Archival Reappraisal: The Immigration Case Files,” *Archivaria* 33 (Winter 1991-1992): 104-116; and Bruce Wilson, “Systematic Appraisal of the Records of the Government of Canada at the National Archives of Canada,” *Archivaria* 38 (Fall 1994): 218-231. For the second phase of macro-appraisal articles, see Catherine Bailey, “From the Top Down: The Practice of Macro-Appraisal,” *Archivaria* 43 (Spring 1997): 89-129; Brian P. N. Beaven, “Macro-Appraisal: From Theory to Practice,” *Archivaria* 48 (Fall 1999): 154-198; and Richard Brown, “Back to the Strategic Roots: Appraisal Reform at the National Archives of Canada,” *Archival Issues* 24:2 (1999): 113-122. The most recent articles about macro-appraisal at LAC include: Kerry Badgley and Claude Meunier, “Macroappraisal, the Next Frontier: An Approach for Appraising Large and Complex Government Institutions,”

In addition, this methodology has influenced the National Archives of South Africa and Australia; the state of Alabama; pilot projects at the National Archives and Records Administration and the Public Records Office; and the provinces of Ontario and Manitoba.³⁸

An approach very similar to the Canadian macro-appraisal model has been advanced by the State Archives of the Netherlands (SA).³⁹ This PIVOT model was launched in 1991 in response to a 1988 report by the Netherlands Court of Audit that strongly criticized the records management practices of government agencies and the SA. Like other top-down appraisal strategies, the Dutch model is heavily research-oriented. Appraisal proceeds along guidelines established in the “Logic Model,” which resulted from several years of research that identified and analyzed the most important acts and tasks of the post 1940-1945 Dutch government in relation to society. The aim is to determine the minimal types of documentation needed to allow “...evaluation and reconstruction of government actions....”⁴⁰ The PIVOT model considers both

Archival Science 5: 2-4 (2005): 261-283; Catherine Bailey, “Turning Macro-appraisal Decisions into Archival Holdings: Crafting Function-based Terms and Conditions for the Transfer of Archival Records,” *Archivaria* 61 (Spring 2006): 147-179; Brian P. N. Beaven, “‘But Am I Getting My Records?’: Squaring the Circle with *Terms and Conditions* Expressed in Relation to Function and Activity,” *Archival Science* 5: 2-4 (2005): 315-341; Margaret Dixon, “Beyond Sampling: Returning to Macroappraisal for the Selection of Case Files,” *Archival Science* 5: 2-4 (2005): 285-313; Normand Fortier, “Transparency, Compliance, and Accountability: Developing A Knowledge Infrastructure for Macroappraisal at Library and Archives Canada,” *Archival Science* 5: 2-4 (2005): 343-360; and, Candace Loewen, “Accounting for Macroappraisal at Library and Archives Canada: From Disposition to Acquisition and Accessibility,” *Archival Science* 5: 2-4 (2005): 239-259.

³⁸ Based on an E-mail message from Terry Cook, 7 July 1998. See also John Roberts, “One Size Fits All? The Portability of Macro-Appraisal by a Comparative Analysis of Canada, South Africa, and New Zealand,” *Archivaria* 52 (Fall 2001): 47-68; John Roberts, “Macroappraisal Kiwi Style: Reflections on the Impact and Future of Macroappraisal in New Zealand,” *Archival Science* 5 (December 2005): 185-210; and Adrian Cunningham and Robin Oswald, “Some Functions Are More Equal than Others: The Development of a Macroappraisal Strategy for the National Archives of Australia,” *Archival Science* 5 (December 2005): 163-184.

³⁹ Information about the Dutch PIVOT project is drawn from the following sources: M. Beekhuis and H.G. Oost, “Logic Model: Institutional Study,” (The Hague: 1992), typescript; Hans Hofman, “The Netherlands – A Window to the Past: Archives on the Interface of Two Worlds,” in *A Window to the Future: Papers from a Conference on Electronic Information held between 20 and 24 June 1994*, ed. Elizabeth Shepherd (London: University College London, 1995) : 44-53; Horsman; P.M.H. Waters and H. Nagelhout. “Revolution in Records,” (1994), typescript; and State Archives of the Netherlands, “An Account for a Method for the Appraisal of Data Collections,” (PIVOT brochure, no date), typescript, “PIVOT – A Turning Point in Appraisal Policy,” and “Taking Action – Government Action: Models, Research Method and Applications,” (The Hague, 1994). For the most recent account of PIVOT-based appraisal, see Agnes E. M. Jonker, “Macroappraisal in the Netherlands: The First Ten Years, 1991-2001, and Beyond,” *Archival Science* 5 (December 2005): 203-218.

⁴⁰ “PIVOT – A Turning Point in Appraisal Policy,” 10.

structure (layers) and function (acts and tasks) in order to locate the sites which should contain the richest sources of information about the government's relationship to society. Once the essential documentation regarding policy making is located, it is transferred in its entirety to the SA, without any examination of actual records. Thus, the application of the "Logic Model" eliminates the application of conventional micro-appraisal criteria. The PIVOT model is meant to be dynamic rather than static and to have the flexibility to be adapted for application in other organizations.

A fifth top-down strategy for appraisal is the functional approach adopted in April 2000 by the National Archives of Australia (NAA). This methodology embeds appraisal within a broader framework for recordkeeping, which is articulated in the Australian standard for recordkeeping, AS 4390.⁴¹ This standard calls for appraisal decisions to take into account the business needs of organizations, their accountability requirements, and broader community expectations. Both internal and external stakeholders in records should be considered by archivists making disposition decisions. In 1998, NAA suspended its existing records-centered approach to appraisal in order to investigate more effective ways of conducting this activity. After researching various options to appraisal being undertaken by other organizations, including documentation strategy, institutional functional analysis, and the Canadian and Dutch models, NAA determined that an approach to appraisal based on government functions would be best suited to the Australian environment. Working closely with the State Records Authority of New South Wales to develop a strategy for designing and implementing accountable recordkeeping systems that would allow government agencies to identify their recordkeeping requirements,

⁴¹ AS 4390 was adopted by the Australian archival community in 1996. It served as the basis for the International Standards Organization recordkeeping standard ISO 15489, which was approved by the recordkeeping community in 2001.

NAA began to develop functions-based disposal authorities for commonwealth records.⁴² In developing these authorities to guide records disposition, archivists take a risk management approach to appraisal. Russell Kelly of the National Archives of Australia notes that during the decision-making process, “Appraisers are asked to analyse the consequences of not meeting identified requirements or interests.”⁴³ Initially, NAA focused on conducting a systematic analysis of all government functions, without making judgments as to the most significant of these activities. More recently, the National Archives of Australia, in consultation with internal and external stakeholders, conducted a macro-appraisal exercise to identify and prioritize among the functions of government. The results of this whole-of-government functional analysis provide NAA with a tool for targeting its appraisal efforts towards agencies which produce the most significant documentation of governance.⁴⁴

These top-down approaches to appraisal – documentation strategy, institutional functional analysis, macro-appraisal, the PIVOT strategy, and the functional approach – represent attempts by the archival community to employ appraisal strategies which will result in a stronger documentary record reflecting the values of society. In these efforts, appraisal is transformed from a physical to an intellectual exercise, to be preceded by careful planning and analysis. The emphasis on examination of actual records characteristic of an earlier era of archival appraisal has shifted to a consideration of the context, functions, and recordkeeping

⁴² These efforts resulted in the publication of the following manual: National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information* (September 2001; revised July 2003), available online, <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>, 3 November, 2006.

⁴³ Russell Kelly, “The National Archives of Australia’s New Approach to Appraisal,” *Archives and Manuscripts* 29 (May 2001): 72-85. The quote is taken from page 75. For additional information on NAA’s approach to appraisal, see Anne-Marie Schwirtlich, “The Functional Approach to Appraisal – The Experience of the National Archives of Australia,” *Comma* 2002.1-2: 57-62 and Cunningham and Oswald, “Some Functions Are More Equal than Others.”

⁴⁴ This whole-of-government functional analysis is described in Cunningham and Oswald, “Some Functions Are More Equal than Others.”

systems in which documents are produced, as well as to research about records creators and the process of records creation.

Multiple Perspectives: Recent Appraisal Monographs

Three recently published monographs on archival appraisal demonstrate the profession's continuing concern for and diverse thinking about the profession's first responsibility.⁴⁵ Given the wide range of theories, strategies, and criteria for conducting selection that have been advanced in the archival literature, it is no surprise that the authors of these volumes reach differing conclusions about how archivists should fulfill their appraisal function. While all three authors recognize the importance and complexity of appraisal, there are distinctions in how they approach this professional responsibility. Archivist Frank Boles advances a particular model for making selection decisions that blends several of the appraisal and acquisition tools previously developed by the profession. American archival educator Richard Cox makes a compelling case for appraising records as evidence using society's recordkeeping warrants, though he suggests that ultimately how archivists conduct appraisal is less significant than their ability to account for their appraisal decisions. Canadian archival educator Barbara Craig embraces the diversity of approaches to appraisal as a means of ensuring that the documentary record that we shape as archivists will be more representative of today's pluralistic societies, while also pointing to the need to produce an archival record of the appraisal process.

These divergent attitudes towards appraisal result from contrasting notions of the objective of archival appraisal and the mission of archives. Boles believes that, "Archivists may

⁴⁵ See Frank Boles, *Selecting & Appraising*; Richard J. Cox, *No Innocent Deposits: Forming Archives by Rethinking Appraisal* (Lanham, MD: The Scarecrow Press, Inc., 2004); and, Barbara Craig, *Archival Appraisal*. Cox's volume was discussed previously in Chapter 1. Craig's work will be examined further in the "Archival Accountability in Archival Appraisal" section of this literature review.

select⁴⁶ records for a variety of goals. The purpose of archives is whatever a particular society or institution wishes rather than the mandate of a universal principle.”⁴⁷ Boles’ underlying premises are reflected in the model he presents to guide this activity, which has been dubbed the “Minnesota Method,” as it was developed by archivists working at the Minnesota Historical Society.⁴⁸ This framework, which incorporates the approach to appraisal advanced by Boles and Young in the 1980s, is intended to provide a pragmatic means of selecting archival records. The six-step process used for selecting methods according to this strategy is:

1. Defining the current goals of the archives and understanding how past decisions have shaped the existing collection
2. Determining the documentary universe
3. Prioritizing
4. Defining desired functions and documentary levels
5. Selecting records
6. Periodic updating⁴⁹

This methodology relies on a combination of newer appraisal tools, including collecting policies and collection analyses, while maintaining that micro-appraisal taxonomies remain useful. Boles argues that through approaching selection in this manner, archivists can have confidence that they have exercised this function responsibly. He concludes, “Archivists can only be held accountable for implementing their institutional mission wisely, planning carefully to gather in the best possible documentation to fulfill that mission, and doing all this within reasonable cost

⁴⁶ Boles prefers the term “select” to “appraise.” He considers it to be an active word that more accurately and clearly conveys what archivists do in fulfilling this professional function. Boles, *Selecting & Appraising*, xiv.

⁴⁷ *Ibid.*, 40.

⁴⁸ For a description of the Minnesota Method, see Mark A. Greene and Todd J. Daniels-Howell, “Documentation with an Attitude: A Pragmatist’s Guide to the Selection and Acquisition of Modern Business Records,” in *Records of American Business*, ed. James O’Toole (Chicago: Society of American Archivists, 1997).

⁴⁹ *Ibid.*, 72. Contrast this outline of the selection process with the business process for appraisal described by Jim Suderman in the “Archival Appraisal and Accountability” section of this chapter. The differences may be partly attributable to the fact that Suderman’s business process is based on international work into the management of electronic records, including: International Council on Electronic Records, *Guide for Managing Electronic Records from an Archival Perspective* (1997), accessed 3 November 2006, available from <http://www.ica.org/biblio.php?pdocid=3&plangue=eng> and InterPARES Project, *The Long-Term Preservation of Authentic Electronic Records: Findings of the InterPARES Project* (Appraisal Task Force Report), accessed 3 November 2006, available from <http://interpares.org/book/index.htm>.

constraints imposed by institutional budgets.”⁵⁰ This notion of accountability addresses the letter rather than the spirit of the concept of archival accountability for appraisal that is developed in this dissertation research.

Cox’s volume views the goal of appraisal as intertwined with the concept of records as evidence. As archivists have grappled with the multitude of issues posed by electronic records and recordkeeping systems, many within the profession have returned to the fundamentals of the archival discipline, which defines records in terms of the initial purpose for which they were created: to serve as evidence of an activity.⁵¹ Within this framework, records are most appropriately appraised on their ability to serve as evidence of the activities which they document, as determined by society’s warrants or recordkeeping requirements for evidence.⁵² Cox argues that it is the worth of records as evidence that gives them subsequent value for other purposes, such as for accountability or memory. Critics of this approach to appraisal contend that such an emphasis on evidence fails to recognize the cultural role of archives,⁵³ but Cox counters:

[T]he debate over records as evidence and memory (or evidence and information or evidence and culture) is based on a false dichotomy. The real debate might be between those archivists and records managers who advocate careful articulation of records appraisal criteria and documentation of the process and those records professionals who collect or acquire with little careful thought as to the meaning or implications of what they are doing.⁵⁴

⁵⁰ Boles, *Selecting & Appraising*, 120.

⁵¹ Frank Boles characterizes this approach to appraisal as the New Paradigm. He describes it as Neo-Jenkinsonian, as it is rooted in the administrative value of records (as opposed to the secondary values of evidence and information articulated by Schellenberg). See Boles, *Selecting and Appraising*, 23.

⁵² For an explanation of the warrant concept, see Wendy Duff, “Harnessing the Power of Warrant,” *American Archivist* 61 (Spring 1998): 88-105.

⁵³ See Boles and Greene, “Et Tu Schellenberg?” and Mark A. Greene, “The Surest Proof: A Utilitarian Approach to Appraisal,” *Archivaria* 45 (Spring 1998): 127-169.

⁵⁴ Cox, *No Innocent Deposits*, 168.

Cox's position reflects a multi-faceted notion of accountability, one which integrates the narrow and legalistic (evidence) aspects of this concept with its social and historical (memory) dimensions.

Craig brings different assumptions about the purpose of appraisal to her consideration of this function. She believes that the "aim of appraisal is to give people and groups a voice in the future through their records...."⁵⁵ Exactly how this objective is met is less important than leaving an archival record – through documentation such as policies, procedures, and appraisal reports – that adequately reflects how appraisal decisions are reached.⁵⁶ In fact, Craig suggests that a variety of approaches to appraisal ultimately produces a documentary record that more accurately reflects the values of today's increasingly pluralistic societies. Rather than seeking to find a universal formula for conducting appraisal, she contends that the profession should focus instead on emerging commonalities in thought about archival appraisal. Craig writes:

Archivists generally agree on the following: an articulated theory of appraisal and of archives is indispensable; a systematic, archive-directed appraisal best focuses resources and energies; full use of existing tools and their further development encourage consistent analysis; micro-appraisal undertaken alone without the support of other types of analysis of requirements, uses, functions, and structures is largely unworkable; groups may better reflect values and support cooperative acquisitions; self-knowledge is fundamental to all successful endeavors; and appraisal is a research-intensive activity.⁵⁷

⁵⁵ Craig, 19.

⁵⁶ The appendices to Craig's volume provide samples of appraisal documentation, but Craig does not analyze these documents.

⁵⁷ *Ibid.*, 134. A recent publication on appraisal conceptualizes commonalities in the appraisal discourse as principles which guide this activity. See Couture, "Archival Appraisal," 104-107. Couture articulates five principles that reflect professional agreement about archival appraisal: archives as privileged proof of the activities of society; respecting objectivity and today's values in making appraisal decisions; respecting relationships between appraisal and other professional functions; respecting a balance between administrative and cultural objectives; and, respecting a balance between the context of records creation and the uses of records. Craig and Couture's thinking about shared threads in archival appraisal appears to be premised on a concept of a universal purpose for archives: that of selecting an archival record encompassing the values of society as a whole. Not all archivists would accept this assumption; remember that Boles argues that the aim of archives is to accomplish those functions that a specific institution or society charges them with. See Boles, *Selecting & Appraising*, 35-36.

Despite the many threads of agreement that can be found in the burgeoning literature on archival appraisal, Craig points to a dearth of empirical literature examining the process of appraisal. She suggests that “tracking and analyzing cases...using structured interviews or by reviewing contemporary reports and other documents, potentially would be useful in developing a more thickly textured understanding of appraisal as it is understood and practiced by those with the responsibility for doing it...”⁵⁸ Such research would serve the additional purpose of rendering archival appraisal more open and transparent to non-archivists.

Archives and Accountability

The most thorough analysis of the concept of accountability, its relationship to archives, and its implications for archivists is a 1993 Master’s thesis completed by Jane Parkinson at the University of British Columbia.⁵⁹ Through a meticulous examination of literature related to recordkeeping and archives, Parkinson demonstrates that the concept of accountability, though often ambiguous, has been implicit to the keeping of records from ancient times. The emergence of writings by archivists with an explicit emphasis on accountability, however, is a much more recent phenomenon, dating to the work of public archivists in the United States around the middle of the twentieth century. Parkinson argues that archival literature does not sufficiently explore the full implications of the concept of accountability for archivists as records professionals. She suggests that this lack of precision may be due to the connection between records and accountability being so ingrained in archivists as they carry out their professional functions as to seem obvious without any need for explanation. Coupled with this, there is the difficulty of discussing accountability in a manner conducive to professional dialogue due to the

⁵⁸ Ibid., 111-112.

⁵⁹ Jane Parkinson, “Accountability in Archival Science” (Master’s thesis, University of British Columbia, 1993).

many contexts in which this concept has been discussed. Parkinson illustrates the plethora of fields for which the concept of accountability has meaning:

The term accountability is used in a number of academic disciplines with regard to a variety of concerns about relationships, authority, and responsibility. For example, in constitutional law the term has been used to describe the conventions and procedures that govern the relations between people and their representatives, representatives and their delegates. In public administration, which has been influenced more by management disciplines than political science or law, accountability is used to mean systems for efficient, effective, responsive, and responsible decision-making. Concern for professionalism has created an emphasis on the 'internal norms' associated with accountability of public officials. Accounting, as its name suggests, was historically associated with accountability but theories in the last century have emphasized accounting as provision of information for decision-making rather than for stewardship. However, writings on the evolving role of public auditors use the term accountability to describe their function. The literature on educational accountability is specifically concerned with the source of authority for public education and the assignment of responsibility for its results, as well as the extent and nature of professional rights and duties. Also, literature on corporate political or moral responsibility sometimes uses the term accountability, giving to it various meanings.⁶⁰

Given the ubiquity of discussions of accountability across so many professions and in society generally, it is critical to focus discourse about archival accountability within its own unique context.

Through an analysis of the concept of accountability and an exploration of archival writings on accountability, Parkinson demonstrates that for archivists, accountability is only meaningful within the context of records. More particularly, the significance of accountability for archivists is the understanding of records as evidence of transactions.⁶¹ The professional literature reflects that archivists appreciate the centrality of records to systems of accountability that allow for individuals and organizations to be held accountable for their actions. A primary responsibility of archivists is to preserve the records that provide evidence of these actions.

⁶⁰ Ibid., 7-8.

⁶¹ Ibid., 131.

Parkinson notes that what is less evident in the archival literature is a widespread notion of accountability as it applies to the professional activities of archivists themselves. In practice, however, archivists have acknowledged their accountability for the responsible management of archives by creating theories, policies, and procedures and systems of documentation to reflect their recordkeeping activities.⁶² While written documentation of archival policies, procedures, and decisions does serve as evidence that archivists acknowledge their accountability for the responsible management of the archives entrusted to their care, the records that archivists produce to document their professional functions have not been a focus of research into archival accountability. This study represents one effort to further explore professional accountability for appraisal through the documentation that archivists produce to serve as evidence of this activity.

In the years since Parkinson's important research on accountability, the role that archives play in allowing for the demonstration of accountability has received increasing attention in the professional literature. Much of this discussion has taken place in the context of debates about recordkeeping in an electronic environment, which is challenging records professionals to return to the fundamentals of their discipline. Archivists and records managers have reconsidered the definition of records, the nature of records and recordkeeping, the purposes for which records are created, and the importance of records in the lives of individuals, organizations, and societies.⁶³ This renewed dialogue about accountability has also been prompted by a series of accountability scandals world-wide, in the public as well as the private sectors. One Australian archivist has noted that repeated investigations and inquiries into accountability scandals in that country in the

⁶² Ibid., 102-103.

⁶³ See Richard J. Cox, *Managing Records as Evidence and Information* (Westport, CT: Quorum Books, 2001) for a single volume that captures the tenor of much of this professional dialogue.

1980s suggested a strong link between unethical behavior and a breakdown in recordkeeping.⁶⁴

The archival community's desire to educate itself, other professions, and the general public that reliable and trustworthy records are necessary to ensure that individuals, organizations, governments, and societies can be held to account for their actions is illustrated in two full-length monographs, published within a decade of each other, exploring the connections between records and accountability.⁶⁵

Researchers in the Records Continuum Research Group at Monash University in Australia have been active in examining the role that recordkeeping plays in relation to accountability. Sue McKemmish and Glenda Acland have proposed that accountable recordkeeping serves five important functions:

- facilitating good governance;
- underpinning accountability mechanisms;
- constituting corporate, national, and societal memory;
- constructing individual, community, and national identity; [and]
- providing authoritative sources of information.⁶⁶

McKemmish emphasizes that this conception of recordkeeping relies on an expanded definition of accountability, one that “encompasses historical and cultural accountability as they relate to memory and identity, as well as democratic accountability.”⁶⁷ Through examining

⁶⁴ Sue McKemmish, “Recordkeeping, Accountability, and Continuity: The Australian Reality,” in *Archival Documents: Providing Accountability Through Recordkeeping*, 9-26, ed. Sue McKemmish and Frank Upward (Melbourne: Ancora Press, 1993).

⁶⁵ Sue McKemmish and Frank Upward, eds. *Archival Documents: Providing Accountability Through Recordkeeping* (Melbourne: Ancora Press, 1993) and Richard J. Cox and David A. Wallace, eds. *Archives and the Public Good: Accountability and Records in Modern Society* (Westport, CT: Quorum Books, 2002).

⁶⁶ Sue McKemmish and Glenda Acland, “Archivists at Risk: Accountability and the Role of the Professional Society,” (Paper presented at the 1999 Annual Conference of the Australian Society of Archivists, July 1999), accessed 3 November 2006, available from <http://www.sims.monash.edu.au/research/rcrg/publications/archive1.html>.

⁶⁷ Sue McKemmish, “The Smoking Gun: Recordkeeping and Accountability,” (Paper presented at the 22nd Annual Conference of the Archives and Records Association of New Zealand, Dunedin, New Zealand, 3-5 September 1998) accessed 3 November 2006, available from <http://www.sims.monash.edu.au/research/rcrg/publications/recordscontinuum/smoking.html>.

documentation related to accountability scandals in Australia in the 1980s and 1990s, McKemmish and Acland identify failures in recordkeeping at the macro- (lack of adequate laws, policies, and standards for recordkeeping) and micro- (inadequate implementation or deliberate wrongdoing) levels, and note that poor recordkeeping creates risks for both organizations and societies.

McKemmish and Acland's research demonstrates that records have a vital relationship to accountability in all societies. The current dissertation research focuses on the additional significance that records, particularly those of government activities, take on in democratic nations. John McDonald of the National Archives of Canada describes records as "instruments of accountability" which are essential in establishing public trust in government and other organizations. He states, "Without records there can be no demonstration of accountability. Without evidence of accountability, society cannot trust in its public institutions." McDonald maintains that citizens expect that public records in particular are authentic and reliable, that they are created and maintained according to well-established procedures, that responsibility for the management of government records is clearly assigned, and that records of their interaction with government agencies will be accessible if they need to consult them. In democratic countries, "[t]he relationship between records and accountability is a crucial building block for sound governance and good government."⁶⁸

Since records are critical to the functioning of society, the organizations which manage them have considerable obligations to the public which has entrusted them with the care of its

⁶⁸ John McDonald, "Accountability in Government in an Electronic Age," (paper presented at the International Records Management Trust Electronic Records Seminar, Kuala Lumpur, Malaysia , 25 June 1998). This paper is no longer available through the International Records Management Trust website, but can be accessed through the Internet Archive's Wayback Machine at <http://web.archive.org/web/20010726105930/www.irmt.org/education/malpaper2.html>, accessed 3 November 2006.

records. Terry Eastwood, an archival educator in the School of Library, Archival, and Information Studies at the University of British Columbia, writes,

In democratic societies..., government administration, and increasingly even private affairs with which government is now inextricably linked in myriad ways, is carried out in the name of the people and in and by the law the people sets through its democratic institutions. We are accountable to each other for what we do to each other and the common land we inhabit and rule so that we may, whatever our conflicts, live in comity. Archives and the institutions which preserve them serve the polity, the commonwealth.⁶⁹

Eastwood traces the evolution of archival institutions in Canada and proposes that it is time for archives world-wide to enter a new phase in their development. He suggests that archives have passed through three different stages. First, archival institutions primarily served the purposes of history and were seen mainly as cultural artifacts. Second, archival institutions focused on passing legal authorities that would facilitate their establishment. Next, they entered a stage in which methods for administering archives came to the fore. Eastwood postulates that it is time for archives to enter a fourth stage in this progression in which, “[i]t is the archivist’s task to spirit an understanding of the idea of archives as arsenals of democratic accountability and continuity into society and into its very corporate and social fabric.”⁷⁰ This new stage would blend together the historical, legal, and administrative aspects of the previous stages, with the addition of the role that archives fulfill in facilitating democratic accountability and continuity of society.

If archives are to serve as “arsenals of democratic accountability and continuity,” it is essential for archivists themselves to demonstrate accountability in their professional activities.

⁶⁹ Terrence M. Eastwood, “Reflections on the Development of Archives in Canada and Australia,” in *Archival Documents: Providing Accountability Through Recordkeeping*, 27-39, ed. Sue McKemmish and Frank Upward (Melbourne: Ancora Press, 1993). The quote is taken from page 36. Note that Eastwood’s fourth stage in the evolution of archival institutions is one that integrates both accountability and memory roles for archives.

⁷⁰ Eastwood, “Reflections on the Development of Archives,” 36.

Social scientist Albert Meijer has drawn on the literatures of archives and public accountability to suggest that records professionals might adopt the anticipation of accountability processes as the basis for establishing accountability in records management. He notes that in making decisions, government organizations consider which of their functions and activities have a high probability of resulting in an inquiry into the decision-making process. If the initiation of an inquiry is deemed probable, organizations then identify which administrative entity would most likely investigate a case. Part of the anticipating accountability process is to foresee the information requirements the investigating body would need to evaluate the decision in question.⁷¹ Meijer writes, “Government organizations anticipate these requirements by creating, capturing, and preserving documents concerning their decisions and activities.”⁷² He concludes that records professionals should incorporate the anticipating accountability processes method into determining what documentation an organization should create and maintain. The current study suggests that it is possible to take Meijer’s proposition a step further and suggest that archivists could benefit from applying this strategy to the activities and functions which they perform in administering archival holdings, beginning with an identification of the information requirements that would be necessary to an administrative authority charged with investigating the appropriateness of disposition decisions. The logical result of this exercise would be for archivists to determine and subsequently produce the types of documentation required to demonstrate responsibility for appraisal should they be called to account for this activity.

In contrast to archival literature which has taken for granted archivists’ understanding of the connections among archives, archivists, and accountability, a recent contribution to this discussion reaches what some might find to be the startling conclusion that as archivists, “We

⁷¹ Albert Meijer, “Anticipating Accountability Processes,” *Archives and Manuscripts* 28 (May 2000): 52-63.

⁷² *Ibid.*, 56.

ourselves are, in short, unaccountable.”⁷³ Australian archivist Chris Hurley arrives at this position through a close examination of what it means to be accountable, which he then relates to current understanding and practice in the archival community. Hurley contends that in order to be fully accountable, it is necessary for archivists to know to whom we are accountable; for what we are accountable; how our performance should be measured; and by whom or how our performance can be monitored and corrected. Through an examination of the controversial appraisal decision embodied in the Heiner Affair and the Australian Society of Archivists’ shifting response to it over a number of years, Hurley makes the case that, as a profession, archivists are still answering these basic questions that must be addressed in order for the archival community to be capable of being accountable.

Hurley argues that the Heiner Affair represents a collective failure of the archival profession, symptomatic of “serial failures of professional accountability when it comes to public issues.”⁷⁴ He calls for archivists move beyond such failures and to strive to avoid future recordkeeping failures by getting about the difficult work of thinking through what professional actions are required if archivists are to make the claim that they are agents of accountability:

Our next task...is to set about clearly articulating recordkeeping roles and responsibilities. We then need to lobby to make sure they are clearly understood. How often do we wring our hands and bewail the fact that our role (and, we believe, its importance) is not widely understood? How often do we reflect that this may be because we ourselves are confused and disunited about it? Is it the case that we cannot enlighten others about our role (and its importance) because we cannot give an intellectually coherent account of what we do – much less evidence of the fact that we do it?⁷⁵

Only by clearly establishing to whom and for what we are accountable, developing standards and

⁷³ Chris Hurley, “Archivists & Accountability: A Commentary on Ethical Standards,” (June 2004, revised 2005), accessed 3 November 2006, available from <http://www.caldeson.com/RIMOS/archivists01.html>.

⁷⁴ Ibid..

⁷⁵ Ibid..

benchmarks to guide archival practice, and implementing checks to ensure that our behavior is accountable will the archival professional be able to establish a systematic framework that will allow archivists to be fully accountable.

Accountability in Archival Appraisal

The preceding section of this literature review introduced Terry Eastwood's notion of archival institutions as "arsenals of democratic accountability and continuity" and his position that the profession must foster this understanding of archival institutions within society.⁷⁶ In a later article, Eastwood considers the nature of a democratic society and speculates that the objective of archival appraisal must be grounded within a firm understanding of the essence of democratic governance. He states that central to democracy is the idea that elected officials and those to whom they delegate responsibilities are accountable to the citizenry for their actions and decisions. Through the election of representatives, citizens within a democratic society participate in governance. The management of public records, beginning with appraisal, is delegated to the archival profession by officials chosen by the people. In this delegated capacity, archivists must be accountable for appraisal. "Appraisal of archival documents in a democratic society must somehow serve the need of citizens to know how they have ruled themselves, and to allow them to build understanding of their place in the communities to which they consider themselves to belong..."⁷⁷ For Eastwood, then, accountability in appraisal in a democratic nation consists of selecting records that reflect the values embodied in self-governance.

In order to achieve accountability in archival appraisal, it is first necessary to establish a framework for accountability in this function. Canadian archivist Jim Suderman outlined such a model in 2003 during a presentation to the Eastern and Southern Africa Regional Branch of the

⁷⁶ Eastwood, "Reflections on the Development of Archives," 36.

⁷⁷ Terry Eastwood, "Reflections on the Goal of Archival Appraisal in Democratic Societies," *Archivaria* 54 (Fall 2002): 66.

International Council of Archives Conference.⁷⁸ Suderman's model for appraisal accountability is developed on the conception of this function as an ongoing business process consisting of a minimum of five "decision points," or six if the records are transferred to an institution outside the creating organization for preservation. Planning for appraisal begins prior to the creation of any records, as this is essential in an electronic environment. Suderman's appraisal business process contains the following stages:

1. (Conception): Determining what records to create to support the business of archival appraisal, including determining how to create them as reliable and preservable evidence;
2. (Creation): Determining that the records identified in the conception stage are in fact created, and confirming that they fulfill the business requirements and that they can be preserved;
3. (Use): Determining how relationships between the records within the appraisal business process as well as relationships with related business processes (e.g., description) are established and maintained, and how authorized modifications to the records are made;
4. (Maintenance): Determining how long the records and their relationships must be preserved from unauthorized modification (security) and remain accessible (through technological change);
5. (Disposition): Determining that records slated for destruction are destroyed. For records slated to be preserved, determining that the preserver has the capabilities to preserve the records essentially intact; [and,]
6. (Maintenance): Same as #4, but now within the preserver's organization.⁷⁹

Though Suderman does not make this argument, it is possible to view the documentation created by archivists to govern the appraisal process as among the records to be identified at the conception stage and subsequently created as essential for the demonstration of archival accountability for appraisal.

Suderman situates his discussion of accountability within the context adopted in the International Standards Organization 15489 records management standard, which "defines

⁷⁸ Jim Suderman, "An Accountability Framework for Archival Appraisal," (paper presented to the Eastern and Southern Africa Regional Branch of the International Council of Archives Conference, Maputo, Mozambique, 22-26 July 2003), accessed 3 November 2006, available from <http://www.ahm.uem.mz/esarbic/docs/jim.pdf>.

⁷⁹ Ibid., 4-5.

accountability as the ‘principle that individuals, organizations, and the community are responsible for their actions and may be required to explain them to others.’”⁸⁰ He argues that accountability in appraisal must be grounded in professional principles and ethics and address the question of for how long archivists are accountable for this function. Suderman identifies three broad, interrelated layers of accountability as necessary components of an appraisal framework: societal accountability, professional accountability, and institutional accountability.

At the highest level of accountability, archival accountability to society, Suderman notes that the first challenge is “to define the society on whose behalf appraisal is being undertaken and what its values are,”⁸¹ taking into account that these values shift over time as societies themselves change. For indicators of societal values, Suderman suggests that appraising archivists can look for guidance to emerging legislation, attitudes towards access to information and privacy, trends in the multi-disciplinary discourse on public memory, and professional attention to accountability as articulated in codes of ethics. Standards provide another benchmark for assessing current societal values. Suderman notes, “Standards that are widely implemented and modified over time provide evidence of an enduring value. Accordingly, standards which are not implemented likely reflect values that are not widely held.”⁸²

The second layer of accountability that Suderman proposes as necessary to a framework for archival appraisal accountability is that of accountability to the profession for the business process of appraisal. Professional accountability “goes beyond any one institution” and “should drive accountability within an institution.”⁸³ Suderman argues that in order for the archival profession to achieve this dimension of accountability, it needs to develop an appraisal standard

⁸⁰ Ibid.

⁸¹ Ibid.

⁸² Ibid.

⁸³ Ibid.

(based on the business process of appraisal) and a means for auditing this process. He suggests that archivists adopt clearly articulated rules as baseline requirements for preservation. Three such rules have been proposed by Chris Hurley:

1. a preservation of evidence rule to keep records for as long as they might be reasonably required to establish anyone's rights and entitlements;
2. a rule against 'ad hocery' [i.e., ad hoc appraisal practice] to ensure that records of the same functional processes are retained for pre-determined retention periods without exception; and,
3. a certainty rule requiring appraisal criteria to be stated in advance and applied without exception.⁸⁴

To these requirements, Suderman suggests adding a corollary that institutional appraisal processes and criteria be regularly reviewed in order to ensure that they reflect new methods of appraisal and shifts in societal values. The final layer of accountability which Suderman defines is that of institutional accountability. Elements needed to support this type of accountability are written policies and procedures for conducting appraisal and full documentation of appraisal decisions. It is this aspect of accountability for appraisal that the current dissertation research explores.

Suderman believes that it is important to address the question of for how long archivists remain responsible for appraisal. He links the levels of accountability which he describes to the evidence axis on the records continuum model outlined by Frank Upward. The "evidence" point on this axis relates to accountability for the business process of appraisal and ends when that function is complete. The "organizational memory" point on the evidence axis is connected to the life of the organization, with accountability remaining in play throughout the existence of the institution. Finally, Suderman equates the "collective memory" point on the evidence axis with "historical" or "societal" time. At this level, archivists remain accountable into the future for having made appraisal decisions reflecting societal values current at the time of the records'

⁸⁴ Ibid. Suderman cites a 2003 posting by Chris Hurley to the aus-archivists listserv.

creation.⁸⁵ Suderman emphasizes that future archivists and society cannot judge today's appraisal decisions on the basis of values that will emerge with the passage of time. Likewise, it is not right to assess the appraisal decisions of previous archivists using values prevalent in our time.

Suderman concludes his examination of accountability and archival appraisal by musing that it is possible that accountability to the profession for the business process of appraisal is already established by standards which in theory "could be audited and challenged within its own business process time context."⁸⁶ He notes, however, that the layers of accountability to society and accountability to the institution also require standards against which to measure implementation because, "Without these higher layers, there is no way to support the archival function of appraisal as an accountable contributor to human memory."⁸⁷ A central component of this dissertation research involved analyzing appraisal documentation to assess whether current practices for documenting this function meet various accountability requirements, including those at the institutional and societal levels.

Documentation of Archival Appraisal

As noted in the previous chapter, little research into the practices of archivists in documenting appraisal has been conducted. The interest of the earliest study of appraisal documentation was not accountability per se, but the standardization of appraisal documentation so that it could be effectively shared between institutions. Thomas Ruller of the New York State Archives and Records Administration conducted this research as part of the Government Records Project (1988-1990) sponsored by the National Historical Publications and Records Commission (NHPRC). The main focus of this study was the utility of appraisal documentation for inter-

⁸⁵ Ibid.

⁸⁶ Ibid.

⁸⁷ Ibid.

institutional sharing of appraisal information. The study grew out of Research Library Group's Seven States Project (1986-1988), which standardized data elements for the presentation of information about archives, including that about appraisal, in the MARC-AMC format. While the Seven States Project developed a format for the exchange of appraisal information, case studies conducted by project participants revealed that data provided about appraisal was of low quality and so cryptic as to be of limited value outside the creating institution. To follow up on this initial study and to promote inter-institutional sharing of appraisal data for records common to many agencies, the Appraisal Working Group of the Government Records Project surveyed twenty-one government agencies at the national, state, and local level, asking them to describe their practices for documenting appraisal decisions.⁸⁸

Based on the results of this survey, Ruller concluded "a surprising level of consistency exists in the way records are evaluated to determine their long-term value. This consistency, however, is not reflected in the methods used to document appraisal decisions."⁸⁹ He identified four broad categories of appraisal documentation: forms, forms supplemented by short memoranda or reports, reports or memoranda only, and no documentation at all. While Ruller's conclusion about remarkably similar methods of reaching appraisal decisions appears debatable given the great disparity in the form and content of appraisal documentation which he underscores, his point about the limited usefulness of existing appraisal documentation is well-taken. In essence, much documentation of appraisal provides little more than the final disposition decision, rather than capturing the complexity of the appraisal decision-making

⁸⁸ Thomas J. Ruller, "Dissimilar Appraisal Documentation as an Impediment to Sharing Appraisal Data: A Survey of Appraisal Documentation in Government Archival Repositories," *Archival Issues* 17:1 (1992): 65-73.

⁸⁹ *Ibid.*, 65.

process.⁹⁰ This finding undermines the ability of such documentation to provide a full accounting of how and why appraisal decisions have been made.

Ruller suggests that current practices for documenting appraisal reflect that archives “do not create information for external consumption regarding what can be considered an internal process.... The first priority for documentation of any archival administrative task is to meet the institutional needs.”⁹¹ Though he views the documentation of appraisal primarily as an internal administrative matter, Ruller sees the value of appraisal documentation for those outside the institution. He thus calls for a standardization of appraisal documentation, arguing that, “Archivists must develop minimum requirements for the content of appraisal documentation if appraisal decisions are to be understood by other institutions and by those who will administer the records in the future.”⁹² Significantly, Ruller does not seem to recognize the interest of appraisal documentation for users of archives or the general public or its value as an instrument of accountability which can be utilized to demonstrate that archivists have reached responsible disposition decisions.

In contrast, Livia Iacovino’s two-part case study of the disposal practices of Australian Archives (now the National Archives of Australia) emphasizes the need for archival institutions to demonstrate accountability in the appraisal decisions they make, and views appraisal documentation as an integral part of a responsible disposition program. Iacovino, an instructor at the Graduate Department of Librarianship, Archives, and Records Management at Monash University and formerly an archivist at Australian Archives, explores the role of Australian

⁹⁰ A recent volume on appraisal also comments on the widely differing levels of documentation about the appraisal decision-making process across archival institutions, which might indicate that this discrepancy may be even more widespread than that suggested in Ruller’s study. See Richard J. Cox, *No Innocent Deposits: Forming Archives by Rethinking Appraisal* (Lanham, MD: The Scarecrow Press, Inc., 2004), 250.

⁹¹ Ruller, 71.

⁹² Ibid.

Archives in ensuring accountable recordkeeping through providing guidance to and overseeing disposal of the records of government agencies.⁹³ Iacovino emphasizes that an archival authority itself must “be accountable to the public for the disposal actions it recommends so that the reasons for maintaining particular records are available publicly,” and links the archival functions of appraisal and access, noting that, “As premature destruction of records is a denial of access, rights of access would be tied to appraisal.”⁹⁴

Iacovino sees documentation of the appraisal process as essential for allowing Australian Archives to demonstrate to the public that it has exercised its disposal function responsibly. Iacovino found that Australian Archives maintains detailed documentation of its appraisal activities. This documentation takes a variety of forms, including “procedural manuals for outside scrutiny, articles in journals and for conferences, reporting in its annual reports, databases on disposal activities, and corporate and business plans.”⁹⁵ One area of documentation which Iacovino considered to be lacking was evidence that Australian Archives regularly consults with historical or special interest groups in preparing disposal authorities for government records, as the Advisory Council on Australian Archives had exhorted it to do. Australian Archives’ disposal decisions are seldom questioned and have not been challenged in court cases, perhaps because of the limited appeal provisions available to the public through the *Archives Act 1983*. While Iacovino advocates better mechanisms for the appeal of disposition

⁹³ This research is described in the following two essays: Livia Iacovino, “Accountability for the Disposal of Commonwealth Records and the Preservation of Its Archival Resources: Part I – The Context,” in *Archival Documents: Providing Accountability Through Recordkeeping*, 55-71, ed. Sue McKemmish and Frank Upward (Melbourne: Ancora Press, 1993) and Livia Iacovino, “Accountability for the Disposal of Commonwealth Records and the Preservation of Its Archival Resources: Part II – The Disposal Practice of Australian Archives,” in *Archival Documents: Providing Accountability Through Recordkeeping*, 73-97, ed. Sue McKemmish and Frank Upward (Melbourne: Ancora Press, 1993). Australian Archives became the National Archives of Australia in 1984.

⁹⁴ Iacovino, “Accountability for the Disposal of Commonwealth Records and the Preservation of Its Archival Resources: Part I – The Context,” 59-60.

⁹⁵ Iacovino, “Accountability for the Disposal of Commonwealth Records and the Preservation of Its Archival Resources: Part II – The Disposal Practice of Australian Archives,” 88.

decisions, she believes that the detailed appraisal documentation which the institution maintains as part of its risk management strategy would serve as a good line of defense if such a case were to arise.⁹⁶

While Iacovino noted that Australian Archives had not been asked to account for appraisal decisions, archivists in other institutions have faced this challenge. In the United States, concern over what some constituents considered an inappropriate disposal of records of the Federal Bureau of Investigation prompted a court case in 1979. At issue was whether the National Archives was placing the interests of the FBI ahead of the public interest in these records by accepting the agency's recommendations regarding the destruction of FBI records without an examination of those records by archivists from the National Archives. In response to the criticisms raised by this litigation, the National Archives and Records Service developed a detailed appraisal methodology for sampling the large volume of records under consideration. This case demonstrates one avenue available to the public – the judicial system – for holding government archivists accountable for their appraisal decisions.⁹⁷

In the mid-1980s, the Deschênes Commission examined allegations of improper records destruction by the Public Archives of Canada which critics charged might have shed light on an investigation by the Canadian government of the possible illegal entry of Nazi war criminals into Canada after World War II. In 1985, the commission discovered that records which might have been relevant to its inquiry had been destroyed by the Public Archives of Canada three years earlier. The institution came under attack in the popular press, suspected at best with negligence

⁹⁶ It is important to note that since the time of Iacovino's study in the early 1990s, the National Archives of Australia has completely reengineered its appraisal process, and is currently making additional modifications. Thus, it must be kept in mind that the documentation that Iacovino describes was that produced by former appraisal practices at Australian Archives. Current practices for documenting appraisal at NAA will be explored in Chapter 6.

⁹⁷ See James Gregory Bradsher, "The FBI Records Appraisal," *Midwestern Archivist* 13:2 (1988): 51-66 and Susan D. Steinwall, "Appraisal and the FBI Files Case: For Whom Do Archivists Retain Records?," *American Archivist* 49 (Winter 1986): 52-62.

in the destruction of these immigration records and at worst with deliberate intent to hinder a criminal investigation and legal action against Nazi war criminals. Testimony by government archivists and documentation of the appraisal decision proved that the records had been disposed of according to institutional policies and procedures for the destruction of government records (and, moreover, that the records had contained little of interest to the Nazi war criminals investigation). Though the Public Archives was vindicated of any negligence or wrongdoing in the disposal of the immigration records in the Deschênes Commission's December 1986 report, this experience served as a learning experience, ultimately becoming one of the catalysts for the institution's revamping of its appraisal policies and documentation of appraisal decisions.⁹⁸

Finally, in Australia in the 1990s, questions were raised about whether the Queensland archivist had knowingly approved the disposal of records that were the object of pending litigation. The cabinet of the state of Queensland actively urged the State Archivist to destroy these records because it feared they might be used to initiate litigation against the government. What the Cabinet did not reveal to the State Archivist, however, was that its concern was specific rather than general – the government knew that the records were relevant to impending litigation against the government. During the subsequent inquiry into this destruction, the government maintained that the Cabinet had been acting in the best interests of the public (by avoiding costly litigation against the state, the expense of which would have been borne by taxpayers), and that it had done nothing wrong since legal action had not been formally initiated. The government also maintained that possible legal values of the records were no concern of the State Archivist, who was charged only with assessing possible historical value of documents. One archivist who has

⁹⁸ See Robert J. Hayward, "Working in Thin Air': Of Archives and the Deschênes Commission," *Archivaria* 26 (Summer 1998): 122-136 and Terry Cook, "A Monumental Blunder: The Destruction of Records on Nazi War Criminals in Canada," in *Archives and the Public Good: Accountability and Records in Modern Society*, 37-65, ed. Richard J. Cox and David A. Wallace (Westport, CT: Greenwood Press, 2002).

studied this case closely argues that its primary lesson is that in order to ensure greater accountability in the disposal of government records, routine policies and procedures should be established to govern the appraisal and destruction of records. Any requests to depart from the normal routines would thus raise a red flag to archivists, indicating the need to investigate why an exception is being sought.⁹⁹

While the specifics of the FBI and Nazi immigration records and the Heiner affair differ, collectively they raise similar issues which archivists in government institutions face in making appraisal choices and highlight the need for accountable documentation of disposition decisions. Government archivists must make appraisal decisions that balance the interests of the agencies which they serve against the interests of the public. These cases point to public expectations that government records will be managed responsibly by the archival institutions entrusted with their care. Ironically, however, these cases also indicate that the public, and for that matter, other government agencies, have a poor understanding of archival appraisal. In each of these cases, documentation of the appraisal process was instrumental in demonstrating that disposition decisions had been made responsibly, in accordance with relevant legislation, institutional policies and procedures, and professional best practice for archival appraisal.¹⁰⁰ The public lack of understanding of appraisal, as revealed in controversial cases such as the FBI and Nazi immigration cases and the Heiner affair, argues strongly for comprehensive documentation of the appraisal process in general and of disposition decisions in particular.

⁹⁹ Chris Hurley, "Records and the Public Interest: The 'Heiner Affair' in Queensland, Australia," in *Archives and the Public Good: Accountability and Records in Modern Society*, 293-317, ed. Richard J. Cox and David A Wallace (Westport, CT: Greenwood Press, 2002).

¹⁰⁰ With respect to the Heiner Affair, note that while appraisal was conducted according to established policy and procedures, Chris Hurley has characterized this disposition decision as a collective failure of the archival profession because no safeguards against ad hoc appraisals were in place at the time. See Hurley, "Archivists & Accountability."

This dissertation maintains that documentation of the appraisal process is essential in enabling archivists to demonstrate that they have performed this function responsibly. For archivists to be held accountable for appraisal decisions, this documentation must render the appraisal process open and transparent and explain how particular disposition decisions have been reached. Part of ensuring archival accountability in appraisal entails making documentation of appraisal readily available to the public. In 1999, the Public Record Office of the United Kingdom National Archive began a unique effort to make its selection program more transparent and to involve external stakeholders in public records in the appraisal process in the spirit of democratic participation in governance.¹⁰¹ This shift in the Public Record Office's appraisal policy took place as part of a government-wide program of openness and transparency in governance and in conjunction with the adoption and publication of a new acquisition policy.

Stephen Twigge describes three types of documentation that figure into the new appraisal regime implemented by the Public Record Office (PRO) at the United Kingdom National Archive: the acquisition policy, the disposal policy, and operational selection policies (OSPs). The acquisition and disposal policies represent macro-level documentation which guides appraisal and disposition in general. OSPs are micro-level documentation which include disposition recommendations for the records of particular government agencies and serve as records disposal authorities.

¹⁰¹ The Public Record Office's approach to appraisal is described in Stephen Twigge, "Public Records, Public Consultation: The Involvement of Stakeholders in the Selection of Records at the Public Record Office, the United Kingdom National Archive," *Archives and Manuscripts* 31 (May 2003): 15-24. At the time the current dissertation research was developed, no information about this program was available. The decision was made not to include Great Britain in this comparative case study because, in keeping with a Jenkinsonian approach to appraisal in which administrators rather than archivists are responsible for appraisal, little research on appraisal had emerged from that country. The assessment of the relative lack of involvement of the British archival profession in discussions of appraisal is noted in a recent article in the professional literature. See Carol Couture, "Archival Appraisal: A Status Report" *Archivaria* 59 (Spring 2005): 93.

The acquisition policy that emerged from a review conducted from 1997-1999 articulated the PRO's priorities for preservation, based on changes that had taken place in society since the 1950s, when the previous policy was adopted based on the recommendations of the Grigg Committee. The new acquisition policy resulted from a consultative process, in which external stakeholders in the appraisal process were asked to provide written comments on the draft version. Twigge explains that drafts of the acquisition policy were sent to all history teachers at British universities, and that several public seminars were held to explain the policy. As a result of this effort, the PRO received over 150 written submissions regarding the proposed acquisition policy; ninety-seven percent of these supported the new approach to appraisal. The disposal policy, which addresses the circumstances in which public records are deposited in repositories outside the PRO, resulted from a similarly collaborative process during 1999-2000. Sixty-two written responses were submitted to the PRO regarding the proposed disposition policy; as in the case of the draft acquisition policy, feedback was positive.

With the recently adopted acquisition and disposal policies in place, the PRO was positioned to move ahead with the appraisal of records, again using a consultative approach to encourage public participation and facilitate transparency. As part of the appraisal process, PRO archivists work with government agencies to prepare OSPs which contain disposition recommendations for records of specific agencies or records documenting the same function in more than one agency. When the OSP is complete, it goes to the PRO's Record Review Panel for approval. Once the panel endorses the OSP, the draft document is then circulated to academics and specialist groups for comment, and it is also posted on the PRO website for public comment. Initially, the length of time for the consultation period was set at three months. The amount of time that a consultation can actually take, however, varies based on the number of

responses received, which Twigge indicates range from 80-100 for OSPs that contain recommendations related to records with potential value to genealogists and average 10-20 for records dealing with more specialized topics.

At the end of the consultative process, PRO archivists assess responses received from stakeholders and make revisions to the OSP when it is deemed appropriate for suggestions to be acted on; this can be a challenge as different submissions contain contradictory positions. The revised OSP then goes before the Records Review Panel for final approval. Twigge notes:

The decision not to select particular records often generates criticism. If the original decision is confirmed, despite adverse reaction, all effort is made to find an institution to which the records can be offered under the terms of a presentation....In all cases, every effort is taken to explain how and why the panel arrived at its decision. To achieve this transparency, every correspondent is contacted and informed of the decisions taken. If suggestions are not acted upon, care is taken to explain to correspondents why the particular course of action was not considered appropriate. The minutes of the panel's meetings are regularly posted on the PRO's web-site.¹⁰²

Twigge admits that there are pros and cons to this consultative appraisal process. Among the positive aspects of this approach are that it brings fresh perspectives to the selection of records for preservation and contributes to stakeholder investment in archives. At the same time, it can be a challenge to explain the complexities of the appraisal function to non-archivists, and the process by its very nature is time consuming. Perhaps as the PRO works to streamline this nascent approach to appraisal and gains more experience in its implementation and in working with stakeholders, the downsides to this consultative process can be minimized.¹⁰³

¹⁰² Twigge, 22.

¹⁰³ For another perspective on the PRO's consultative appraisal process, see E. Honer and S. Graham, "Should Users Have a Role in Determining the Future Archive? The Approach Adopted by the Public Record Office, the U.K. National Archive, to the Selection of Records for Permanent Preservation." *Liber Quarterly: The Journal of European Research Libraries* 11:4 (2001): 382-399.

Barbara Craig offers a clear and forceful rationale for the importance of documenting the appraisal process and disposition decisions.¹⁰⁴ Situating her argument within a framework of the moral obligations and professional ethics of archivists in the conduct of appraisal, she makes the case for an “architecture of responsible appraisal.”¹⁰⁵ This architecture should be grounded in policies and procedures for appraisal that derive from the mission of the institution and the mandate of the archives. Formalizing these foundational documents in writing provides archivists within the institution a “common script” for conducting appraisal. Craig notes that procedures and documentation “are the best way yet devised to support the completeness and consistency of work. Most important for the archivist and the users of archives, these documents support accountability across time by constituting an audit trail of appraisal and acquisition.”¹⁰⁶

Craig differentiates between responsibility and accountability, contending that archivists must be both responsible and accountable for appraisal decisions because of the power they exercise in making the choices that shape society’s documentary record. She writes,

“The unchanging element in appraisal is the moral obligation of the appraiser and the ethical responsibility this brings in its train. Accountability, by contrast, is morally neutral. It is a relationship between an actor and auditor with no moral obligation beyond that discharged by ensuring specified means of rendering an account are in place. Responsibility, by contrast, includes accountability, but extends this into the realm of human interaction where rights and obligations are shared. One can be accountable and irresponsible at the same time; however, one cannot be irresponsible in appraisal because in undertaking it we assume the position of moral judge on people and their communities as these are extended in documents. There is little if any appeal against the judgements we make – only a very few things will survive while most will be destroyed through conscious decisions or neglect.”¹⁰⁷

¹⁰⁴ Note that Richard Cox has advanced a similar argument in *No Innocent Deposits*, 263.

¹⁰⁵ Barbara Craig, *Archival Appraisal: Theory and Practice* (München: K. G. Saur, 2004). For discussion about Craig’s proposed architecture of responsible appraisal, see Chapter 6.

¹⁰⁶ *Ibid.*, 119-120.

¹⁰⁷ *Ibid.*, 126.

The records that archivists produce to document the appraisal process and their disposition decisions, then, represent a means of achieving accountability – of ensuring that archivists can be called to account for these activities. Craig maintains that it is not enough for archivists to be accountable for appraisal; they must be responsible as well because the selection decisions they make shape society’s archives.

Implicit in Craig’s argument is that in accepting professional responsibility for the appraisal function, archivists enter into a contract with society which requires them to be moral and ethical – as well as accountable – in exercising the power that has been delegated to them. Craig observes that “ethics are best proved in documents tied to procedures....While the archivist may not be in complete control of all aspects of appraisal, they have complete control over procedures and documents.”¹⁰⁸ She notes that many of the elements that are necessary to establish a responsible architecture for appraisal – policies, procedures, and appraisal reports – have been used in archives for many years. These documents represent a framework for accountability and responsibility that is essential in all archival institutions, regardless of mission or size. Craig states, “These elements collectively are the various ways that archivists discharge professional and moral responsibility for their actions – employers, sponsors, and society require tangible accounting as do our successors in the profession. Future generations should be able to know not only *what* we did, but also *why* we did what we did.”¹⁰⁹ This dissertation research explores the documentation of appraisal to assess whether current practices for recording the appraisal process and disposition decisions meet this standard.

The next chapter of this dissertation outlines the methodology used to examine how three national archival institutions – the National Archives and Records Administration in the United

¹⁰⁸ Ibid., 125.

¹⁰⁹ Ibid., 114.

States, Library and Archives Canada, and the National Archives of Australia – document appraisal. In doing so, this study explores the connections between appraisal documentation and accountability and demonstrates that comprehensive documentation of the appraisal process and disposition decisions contributes not only to responsible appraisal, but also to greater openness and transparency in this important archival function.

CHAPTER THREE

METHODOLOGY

The chief premise underlying this research is that documentation of appraisal is critical in enabling archivists to demonstrate accountability for disposition decisions. Several interrelated propositions are central to this research. First, this study adopts the position that society has delegated responsibility for appraisal to the archival profession. Consequently, through accepting this delegation, archivists take on moral and legal imperatives to account for this activity. This accountability relies to a large degree on thorough and adequate documentation of the appraisal process in general and disposition decisions in particular. Finally, archivists need to become more cognizant of their documentation of appraisal in order to assess its ability to explain both how appraisal is conducted and why disposition decisions are reached.

In order to explore the relationships between appraisal documentation and accountability, this study adopted a comparative case study methodology to examine documentation of the appraisal process and disposition decisions at three national archival institutions: the National Archives and Records Administration (NARA) in the United States, Library and Archives Canada (LAC), and the National Archives of Australia (NAA). This dissertation addresses two research questions using a comparative case study approach incorporating content analysis and interviews:

Question 1: How is appraisal documented in each institution?, and,

Question 2: What constitutes documentation of appraisal that is adequate to permit archivists to be held accountable for appraisal of public records?

The preceding literature review demonstrates that professional writings about accountability in archival appraisal are a relatively recent phenomenon. Little research examining the connection between appraisal documentation and accountability for this core function has been conducted.

As a result, this case study was primarily exploratory and descriptive in order to facilitate detailed accounts of documentation of appraisal at each of the three sites.

Case studies have proven to be an adaptable research design for investigating questions in a variety of disciplines, including education, psychology, sociology, public administration, business administration, and organizational and management studies. This strategy has been utilized successfully in the library and information sciences.¹ It also has been a successful research method for archival studies, and has been used in doctoral dissertations exploring archives-related topics.²

Case studies can be of either single instances or of multiple, or comparative, cases. They provide a suitable methodology for research areas which explore contemporary phenomena within their real-life contexts, especially when the researcher has little control over the phenomenon under investigation. Case studies draw on multiple sources for data and employ different methods of data analysis. They can incorporate other research strategies, such as content analysis and interviews, when supplemental methods will contribute to a better understanding of the phenomenon being studied.³

This dissertation research, which was conducted from July through October 2003, examines how archivists at NARA, LAC, and NAA documented the appraisal decision-making process and specific disposition decisions within their institutions at that time. As the

¹ See Marion Paris, *Library School Closings: Four Case Studies* (Metuchen, N.J.: The Scarecrow Press, Inc., 1988). This study utilized a multiple case study similar to the one adopted in the current research, utilizing documentary sources and interviews to explore the research area.

² See David A. Wallace, "The Public's Use of Federal Recordkeeping Statutes to Shape Federal Information Policy: A Study of the Profs Case," (Ph. D. diss., University of Pittsburgh, 1997); Jeannette Allis Bastian, "Defining Custody: The Impact of Archival Custody on the Relationship Between Communities and Their Historical Records in the Information Age – A Case Study of the United States Virgin Islands," (Ph.D. diss., University of Pittsburgh, 1999); and Tywana M. Whorley, "The Tuskegee Syphilis Study: Access and Control Over Controversial Records," (Ph. D. diss., University of Pittsburgh, 2006). These authors combined historical research methods with case study methods to conduct historical case studies, demonstrating the adaptability of case study designs to a variety of research areas.

³ Robert K. Yin, *Case Study Research: Design and Methods*, 2d ed., Applied Social Research Methods Series, Vol. 5 (Thousand Oaks, CA: SAGE Publications, Inc., 1994), 1-17.

documentation produced during the appraisal process is inextricably tied to strategies and methodologies utilized for carrying out selection activities, the archival record of appraisal is dynamic rather than static. Since practices for conducting appraisal change, so does the documentation of that process. This comparative case study was not designed as a longitudinal study of appraisal documentation within the host institutions; therefore, it does not provide a comprehensive view of practices for documenting this function either prior or subsequent to the time this research was conducted. This research is best seen as a snapshot of the way appraisal was documented at NARA, LAC, and NAA in the latter part of 2003.⁴

This study did not investigate the pros and cons of any particular criteria or methodologies utilized in conducting appraisal. The processes used by each host institution for making disposition decisions are discussed in the context of this study only in terms of the documentation which they generate. Likewise, this research does not assess the archival record of appraisal as an act of judgment concerned with the appropriateness of disposition decisions. Documentation, rather, is analyzed in terms of its ability to explain both how appraisal was conducted and why disposition decisions were reached.

This research explores the interrelationships between appraisal documentation and accountability and demonstrates how comprehensive documentation of the appraisal process and disposition decisions contributes not only to responsible appraisal, but also to greater openness and transparency in this important archival function. The study postulates a critical relationship between documentation of the appraisal process and disposition decisions and the demonstration

⁴ As subsequent chapters will note, each of the three host institutions was in the process of making modifications to its approach to appraisal at the time this research was conducted; therefore, future research could productively assess the impact that these changes have made upon how appraisal activities are documented. Similarly, historical investigations of how these national archives have documented disposition over time would prove useful.

of accountability for appraisal. It analyzes documentation as the means by which archivists demonstrate that they have appraised public records responsibly.

Site Selection

National archival institutions were selected as the context for this study of documentation of appraisal for several reasons associated with the unique status they hold in democratic societies. First, national archives strive to serve the dual functions in society of preserving government records to provide evidence by which public officials can be held accountable for their actions and information upon which society can build its collective memory. Second, because national archives are government institutions which serve the public interest, they have heightened accountability requirements for preserving the public trust by providing adequate documentation to demonstrate their responsible management of the government records which the public has entrusted to their care. It is perhaps within this setting that the role of the archivist as society's delegate for conducting appraisal is realized most fully. Finally, national archives traditionally have assumed a leadership role in the archival community, shaping the archival profession and exerting a considerable influence upon archival theory and practice in many types of archival institutions.

The three institutions selected for inclusion in this study – the National Archives and Records Administration in the United States, Library and Archives Canada, and the National Archives of Australia – were chosen using a purposive approach to sampling. Each of these archival organizations has made significant contributions (either historically or more recently), through the English-language professional literature, to the archival community's understanding

of appraisal and of accountability.⁵ This rendered them especially relevant to the current analysis of the relationships between appraisal and accountability.

At the time this dissertation research was developed, the researcher considered that the appraisal documentation produced by NARA, LAC, and NAA would provide the richest sources of information for conducting this study. The Public Records Office (PRO) of the United Kingdom National Archive was intentionally excluded from the sample because, in keeping with a Jenkinsonian approach in which administrators rather than archivists are responsible for appraisal, little research on this function had emerged from the United Kingdom. In fall 2003, as the research for this study was being concluded, a description of a new appraisal approach being implemented at the PRO was published in the archival literature. Notable components of this strategy are that it attempts to render the appraisal process more open, transparent, and inclusive by incorporating a process of public consultation into decisions regarding the disposition of public records.⁶ Since this procedure for conducting appraisal has clear linkages to the demonstration of archival accountability in selection, it would have been logical to include the PRO in the current comparative case study, had information about it been available several months earlier. Given the timing, however, the researcher determined that an exploration of appraisal documentation at the Public Records Office at the United Kingdom National Archive was most appropriately a subject for future research.

⁵ The contributions of NARA, LAC, and NAA to the areas of appraisal and accountability are detailed in the literature review and in the chapters on each institution.

⁶ See Stephen Twigge, "Public Records, Public Consultation: The Involvement of Stakeholders in the Selection of Records at the Public Record Office, the United Kingdom National Archive," *Archives and Manuscripts* 31 (May 2003): 15-24. Though the publication date is May 2003, the journal did not appear until fall 2003. A description of the PRO's process of public consultation during the appraisal process is provided in Chapter Two.

Phases of Research

To investigate the proposition underlying the study and the related questions, the researcher proposed three phases of research: content analysis of appraisal documentation; interviews with appraisal staff; and, verification of and comments about the researcher's interpretations by appraisal staff at each host site. In accordance with university regulations, the researcher received approval from the University of Pittsburgh's Institutional Review Board (IRB) prior to undertaking this study (see Appendix A). The IRB categorized this research as "Exempt," meaning that the informed consent of interviewees did not have to be obtained and documented as part of this study.

Initially, the researcher expected that the content analysis and interviews would take place as a linear process, proceeding directly from one phase to the next. In the early stages of research, however, it became apparent that, as the content analysis and interview data directly informed each other, these activities could be most productively accomplished as concurrent and iterative processes. This recognition underscored the fact that data gathering for the content analysis and interviews could be most effectively accomplished during site visits by the researcher to NARA, LAC, and NAC.⁷ Traveling to each national archives had the additional benefit of enabling the researcher to study appraisal documentation within institutional context.

The researcher negotiated access to host institutions, via e-mail and telephone, with the heads of the units responsible for appraisal or institutional representatives designated by those units. Appendix B contains the description of the research provided to NARA, LAC, and NAA

⁷ Due to the expense that would be entailed in travel to the host institutions, the original research plan specified that access to appraisal documentation would be provided to the researcher via e-mail or regular mail. The interviews were to be conducted via telephone or e-mail, based on the preference of the appraisal archivists to be interviewed. Given the perceived benefits of conducting a portion of this research at the host institutions, the researcher explored funding opportunities. A travel allowance from the Provost's Office at the University of Pittsburgh permitted the researcher to make site visits to NARA, LAC, and NAA.

as an explanation of this study. The host institutions provided letters granting the researcher access to appraisal documentation and permission to interview staff members involved in the appraisal process prior to the site visits (see Appendices C-1, C-2, and C-3). Each national archives subsequently selected appraisal archivists for the researcher to interview and developed schedules for the site visit. The site visits were arranged at the convenience of each host institution, rather than in a predetermined order. The researcher visited the National Archives and Records Administration in late July of 2003, with a follow-up visit in October. She traveled to the National Archives of Australia in late August, 2003 and to Library and Archives Canada in mid-September, 2003. In total, the researcher spent five working days at each site.⁸

At the outset of this study, the researcher intended to circulate the recommendations that emerged from the content analysis and interviews to archivists at the three host institutions for criticism. Due to the extensive amount of data gathered during the content analysis and interviews, the length of time involved in data analysis, and the realization that the study of appraisal documentation extends well beyond the scope of a single dissertation, the initial strategy was altered to exclude this feedback phase, which can be constructively pursued in future research.

Data Collection and Analysis

Multiple data sources, in the form of documentation of the appraisal process and disposition decisions and interviews with the appraisal archivists responsible for conducting appraisal and generating documentation of that activity, were used as means of exploring the research area. Evidence from various sources was sought to increase the validity of the study

⁸ The July, 2003 visit to NARA took place over three days. The researcher decided to make a second trip two-day trip to NARA in October to examine additional appraisal documentation available to the public through Record Group 64, something which time had precluded during the July visit.

and to permit an informed triangulation of the data gathered. The following sections discuss the methods of data gathering and analysis utilized in this study.

Content Analysis

This comparative case study relied on qualitative content analysis in order to better explore documentation of archival appraisal in the three national archives that were the focus of this dissertation. This research defines appraisal documentation as the written record prepared to describe the appraisal process and to justify a decision to preserve or dispose of a set of records, and which is created and maintained to explain appraisal choices to the institution, other archival institutions, users of archives, government oversight bodies, and the public. Three broad levels of appraisal documentation can be identified: that related to the process of conducting appraisal in general; that pertaining to disposition decisions for common administrative records produced by multiple government agencies; and that concerned with documenting particular disposition decisions for the operational records of individual agencies. In the first category is legislation governing appraisal; institutional appraisal policies and procedures; discussion papers about appraisal; and internal directives or instructions to staff about appraisal. The second grouping incorporates recommendations related to the disposal of administrative records common to multiple government agencies, as well as general records schedules or multi-institutional disposal authorities. The final category contains information relevant to the disposition of operational records of individual agencies, such as appraisal reports; records schedules relevant to the records of a particular agency; correspondence and memoranda relevant to disposition recommendations. Due to the large volume of appraisal documentation, this study focused on the first and third levels of appraisal documentation, limiting discussion of the second category to general observations.

This research presupposed that documentation of both the appraisal process and of disposition decisions existed at NARA, LAC, and NAA. The study, however, made no assumptions about the detail and consistency of this documentation at any of the sites. The researcher anticipated, therefore, that the analysis of appraisal documentation might be uneven depending upon the existing policies and practices for documenting appraisal decisions at the three host institutions. Additionally, the content analysis of appraisal documentation – and the interviews to clarify the appraisal documentation and to gain the perspectives of archivists regarding the relationship between that documentation and accountability for this professional function – relied on the level of access granted to the researcher at the participating institutions.

This study found that general documentation of the appraisal process is the most readily available record of this activity. Information about the legislative authorities for appraisal and disposition of public records, institutional policies and procedures for appraisal, and general records schedules or multi-institutional disposition authorities can be accessed through the websites of NARA, LAC, and NAA. The researcher gained access to documentation of specific disposition decisions for the records of government agencies through the units responsible for conducting appraisal at each host site. This process revealed differences in the ability of citizens to access documentation of disposition decisions in the United States, Canada, and in Australia. It also impacted the disposition documentation obtained for this study.

In the United States, appraisal recommendations are considered public records to which open access is granted to any interested party. These documents are appraised as permanent records, ultimately becoming part of the National Archives and Records Administration's Record Group 64, which contains the agency's administrative records, including those documenting selection. Records that have not yet been transferred to Record Group 64 can be requested

through a freedom of information request. Additionally, summary disposition recommendations are routinely published in the Federal Register for public comment before records schedules are finalized. In Canada, appraisal reports – as operational records of Library and Archives Canada – fall under one of the categories of government records that are subject to review prior to being released, in accordance with provisions included in the Access to Information Act and the Privacy Act.⁹ Since this study was being conducted for the purposes of professional research, the Government Records Branch of LAC, which produces that institution’s appraisal documentation, waived this review process and provided the researcher with access to the requested information. Finally, in Australia, access to disposition documentation can only be obtained with the permission of the agency whose records are the subject of appraisal, since the agencies themselves produce a significant portion of this documentation. In practical terms, this means that access to documentation related to particular disposition decisions in Australia is more restricted than it is in the United States and Canada.

When this study was proposed, the researcher planned to include the appraisal reports for three to five agencies which shared similar responsibilities in the governments of the United States, Canada, and Australia (e.g., health, transportation, or environmental oversight). The differences associated with how appraisal documentation can be released among these three countries, however (particularly the requirement in Australia that agencies consent to make their appraisal documentation available), resulted in a modification to the initial strategy. Instead, the units responsible for appraisal at each host institution were requested to provide appraisal documentation for three to five disposition decisions which it considered to be representative of

⁹ For a listing of the categories of government records subject to this review process and instructions for filing a petition for review, see “Records of the Government of Canada: Access to Information and Privacy – More Details,” Library and Archives Canada (29 March 2003), accessed 3 November 2006, available from <http://www.collectionscanada.ca/services/005-6011-e.html>.

the documentation generated by the then current process for conducting appraisal. This alteration allowed NAA to negotiate access for the researcher to disposition documentation from the agencies it deemed most amenable to sharing this information. In the end, NARA and LAC each provided the researcher with ten disposition documents. NAA, due to the aforementioned constraints in releasing this information to a researcher, supplied three, with the permission of the agencies for which appraisal was documented. Results of the content analysis of appraisal documentation produced by each host institution is reported in Chapters Four, Five, and Six; a comparative analysis is presented in Chapter Seven.

Interviews

To supplement data generated by the content analysis of appraisal documentation at NARA, LAC, and NAA, interviews were conducted with staff responsible for appraisal activities at these institutions. These interviews clarified the appraisal process and the documentation which it generates. They also provided a forum for the interviewees to offer their professional perspectives about accountability in appraisal as it is – or should be – reflected in the archival record of that function. The researcher requested permission to interview six to eight archivists at each host institution who were involved in the appraisal process, ranging from those responsible for formulating policy to those charged with conducting specific appraisals. The individuals at NARA, LAC, and NAA who coordinated the site visits identified archivists willing to be interviewed, providing them with questions beforehand in order to allow them to make considered responses. For a list of interview questions, refer to Appendix D.

Interviews were conducted in person during the site visits, with the exception of one telephone interview with an archivist at NAA who is not based in Canberra. In all, the researcher interviewed twenty-eight appraisal archivists. Seven of the interviewees work at

NARA, twelve at LAC, and nine at NAA. In order to encourage frank responses, interviewees were advised that their responses would be confidential and that individuals would not be identified by name or job title in the study report. The researcher requested permission from interviewees to tape these discussions, with the resulting recordings to remain in the possession of the researcher and to be used for the purposes of this study only. Twenty-three archivists agreed to this request; three interviewees indicated that they preferred that their interviews not be recorded.¹⁰ Following this phase of the study, the tape recorded interviews were transcribed and summaries of the hand-written interview notes were prepared. Data presented in Chapters Four through Seven are derived from these accounts of the interviews. Since the appraisal archivists who participated were assured that their responses were confidential, these transcripts and interview accounts will not be released to other researchers.

Limitations of the Study

Two limitations of this study were discussed previously in this chapter. First, this research offers a snapshot of documentation of appraisal at NARA, LAC, and NAA that reflects how that activity was conducted in 2003. The majority of the information presented in this dissertation, therefore, does not comprehensively address practices for documenting appraisal at these institutions prior or subsequent to that time. Second, as described in the sections on content analysis and interviews, the researcher had varying levels of access to disposition documentation and appraisal archivists at the three host sites. It is therefore possible that this comparative case study mirrors the differences in access.

A third limitation of this study, and perhaps the most significant one, relates to a fundamental characteristic of case study research. This methodology allows for in-depth

¹⁰ Another archivist agreed to be recorded, but the interview could not be taped because the researcher's equipment malfunctioned. The individual who was interviewed via telephone was not recorded. The researcher derived accounts of these two interviews from her handwritten notes.

exploration and description of the phenomenon examined, but broad generalizations cannot be drawn on the basis of the resulting study. This research focused on complex government archival agencies at the national level; thus, the results may not be representative of documentation of practices for documenting appraisal decisions at the state or local government level, or even at other national archives. The findings may be even less typical of practices for documenting appraisal in other types of archival institutions. This research, however, is intended to provide baseline information for research about archival accountability for appraisal through documentation of this function. The model employed in this study may prove useful in conducting future studies exploring the connection between documentation of the appraisal process and disposition decisions and archival accountability.

Summary

This chapter has presented the methodology that was implemented for this dissertation research, identifying the research questions to be explored and the method by which the host institutions were chosen. The techniques of data collection and analysis were described, as well as potential limitations of the study. The next chapter provides an analysis of practices for documenting appraisal at NARA in order to address the question of how this process and selection decisions are recorded at that institution.

CHAPTER FOUR

APPRAISAL DOCUMENTATION AT THE NATIONAL ARCHIVES AND RECORDS ADMINISTRATION IN THE UNITED STATES

This chapter is one of three that addresses the first research question posed in this study: How is appraisal documented? The institutional context considered is the Life Cycle Management Division at the National Archives and Records Administration (NARA), which is tasked with making disposition recommendations to the Archivist of the United States.¹ This chapter begins with an overview of NARA's statutory responsibility for records disposal and appraisal and a summary of NARA's primary contributions to appraisal practice, before turning to a description of NARA's methods for documenting appraisal at the time of this study. It concludes with a discussion of accountability in appraisal at NARA as evidenced in the documentation produced to guide the appraisal process and to justify disposition decisions, as well as on interviews conducted with NARA staff involved in various stages of appraisal.

NARA's Statutory Authority for Records Disposition and Appraisal

The National Archives of the United States was established as an independent agency pursuant to the Act of June 19, 1934, charged with preserving the records of the Federal government. The creation of the National Archives capped over a century of concern for public records, during which numerous Congressional and Presidential committees addressed the disturbing conditions in which the records of the Federal government were kept. Due to underdeveloped practices for the management of public records that had prevailed during the first century and a half of the country's history, the overriding concern behind the creation of a

¹ The national archival institution of the United States has gone through two reorganizations and name changes in its history. The National Archives of the United States (NA) was established as an independent agency in 1934. In 1949, it was reconstituted as the National Archives and Records Service (NARS) as an agency under the General Services Administration. In 1985, the National Archives and Records Administration (NARA) was reestablished as an independent agency.

national archival institution was on ensuring the preservation of records, not authorizing their destruction. Government agencies, however, grappled with the maintenance of records no longer needed for the conduct of business. As new technological means for creating and easily reproducing records were introduced, the volume of records in government agencies steadily increased, burgeoning during World War II. The 1889 legislation which had authorized Congress to approve lists of government agency records for disposal no longer provided an adequate mechanism for the legal destruction of public records.²

Although established primarily to preserve government records of historic value, the National Archives soon became involved in providing advice to government agencies regarding the management of current records as well. This additional responsibility led to the National Archives being renamed the National Archives and Records Service (NARS) in 1949, when the agency was also transferred to the General Services Administration.³ This administrative restructuring, however, was on its own insufficient to establish the records management authority of NARS. Legislation was required to clarify the institution's statutory obligations, including those related to the disposition and appraisal of the records created by Federal government agencies. These legal mandates were laid out in the Federal Records Act of 1950.⁴

Chapters 21, 29, and 33 of the Federal Records Act address the National Archives and Records Administration's role in determining the appropriate retention requirements and the ultimate disposition of public records produced by Federal government agencies. Specifically, the Archivist of the United States holds these responsibilities. Section 3302

² Prior to this legislation, the only law providing for the disposal of government records was a provision enacted in March of 1881, which allowed the Postmaster General to dispose of accumulated files no longer needed for the conduct of business by the Post Office Department. The law specified that these records should not have historical or permanent value, and permitted for their sale as wastepaper. See James Gregory Bradsher, "An Administrative History of the Disposal of Federal Records, 1789-1949," *Provenance* 3 (Fall 1985): 1-21.

³ This reorganization occurred as part of the Federal Property and Administrative Services Act of 1949.

⁴ See the Federal Records Act of 1950, 44 United States Code.

of Chapter 33 tasks the Archivist with developing and circulating to agencies procedures for preparing schedules of records proposed for disposal. Section 3303 charges the heads of government agencies subject to the Federal Records Act with submitting these lists of records to the Archivist to be reviewed in order to receive authorization for disposal of the records covered by the schedules. Section 3303a establishes the Archivist's legislative authority to examine these lists of records with the objective of ascertaining if the records described therein lack "preservation value." If the Archivist determines that the records described in a schedule "do not, or will not after the lapse of the period specified, have sufficient administrative, legal, research or other value to warrant their continued preservation by the Government," he is empowered to authorize the agency to dispose of the records.⁵ Before the archivist approves any records schedule or gives an agency permission to dispose of records, the law requires the publication of a notice of the proposed records disposition in the *Federal Register*, in order to provide an opportunity for interested parties to submit comments regarding the records schedule.⁶

The Federal Records Act specifies that the Archivist may, at his discretion, consult with Congress regarding the disposal of records which may be of particular interest to either Congress or the public. This, however, is not required as a regular procedure.⁷ The Archivist of the United States, therefore, has sole statutory responsibility for authorizing the disposal of government records. He accounts to Congress annually regarding the discharge of this function.⁸

Though Chapter 33 specifically addresses the disposal and not the preservation of government

⁵ Federal Records Act of 1950, Title 44 United States Code, Chapter 33, § 3303a (a). Available at <http://www.archives.gov/about/laws/disposal-of-records.html>, accessed 3 November, 2006.

⁶ Ibid. The *Federal Register* process relating to records disposition will be discussed later in this chapter, in the context of the appraisal process and its associated documentation.

⁷ Federal Records Act of 1950, Title 44 United States Code, Chapter 33 § 3303a (c). Available at <http://www.archives.gov/about/laws/disposal-of-records.html>, accessed 3 November, 2006.

⁸ Federal Records Act of 1950, Title 44 United States Code, Chapter 33 § 3303a (f). Available at <http://www.archives.gov/about/laws/disposal-of-records.html>, accessed 3 November, 2006.

records, the practical effect of this legislation is to render the Archivist of the United States the arbiter who determines what records will be retained by NARA. A decision not to authorize the disposal of records proposed on a schedule submitted by an agency is an indication that the Archivist deems these records to have preservation value; that is, that they warrant continued preservation by Government.

The Archivist delegates the task of making disposition recommendations regarding records created by Federal government agencies to NARA staff. Appraisal archivists in the Life Cycle Management Division of NARA review records schedules submitted to the Archivist in order to determine whether the retention periods proposed by an agency are adequate. As part of this appraisal process, they conduct research to assess whether records have sufficient administrative, legal, research, or other value to warrant continued retention by the Government. They examine records as necessary to verify their appraisal recommendations. Finally, they prepare an appraisal report to submit to the Archivist, offering their professional judgment as to whether a proposed records schedule should be approved. The decision to authorize the disposition of records based on these recommendations rests with the Archivist of the United States.

NARA's Primary Contributions to Appraisal Practice

The framework within which NARA archivists appraise records has its origins in the early history of the National Archives (NA). In fact, this approach to appraisal is one that impacted appraisal practice not only at the NA, but shaped professional selection strategies for many years. One commentator on archival appraisal has credited the National Archives of the United States with being “the cradle for contemporary American appraisal thought.”⁹ This

⁹ Frank Boles, in association with Julia Marks Young, *Archival Appraisal* (New York: Neal-Schuman Publishers, Inc., 1991), 4.

assessment is justified, as archivists from the National Archives were the first to take up the issue of archival appraisal seriously in the North American professional literature, and from the 1940s through the 1960s dominated professional thinking about appraisal. In 1940, Philip C. Brooks introduced the idea of "permanent value" as a criterion on which to base decisions regarding the disposition or retention of government records.¹⁰ He suggested that in order to establish whether records contained archival value, archivists must determine the value of records to their creators, their utility for understanding the creator's administrative history, and their potential historical value.

In 1944, G. Philip Bauer offered the next substantive contribution to appraisal thought. Bauer argued that the cost of retaining records should be a factor in appraisal decisions, and identified four types of record use: reference by government agencies; protection of citizen rights; research by scholars; and satisfaction of genealogical and antiquarian curiosity. He maintained that the first two categories of use justified higher costs of retention than the other two.¹¹ In his overview of the history of archival appraisal, Frank Boles notes:

Bauer's prioritization of uses to which records could be put implicitly reflected his interpretation of federal priorities and, as such, hinted at the role of policy in selection. Neither he nor his contemporaries, however, developed the idea of a linkage between institutional policy and selection criteria and thus the concept remained implicit for another generation.¹²

For many years, Bauer's suggestions that cost, subsequent use, and policy should play a role in appraisal decisions remained controversial.¹³ With time, however, each of these methods developed its proponents in the archival literature.¹⁴

¹⁰ Philip C. Brooks, "The Selection of Records for Preservation," *American Archivist* 3 (October 1940): 228-234.

¹¹ G. Philip Bauer, *The Appraisal of Current and Recent Records: Staff Information Paper #13* (Washington: National Archives, 1946): 3-5.

¹² Boles, *Archival Appraisal*, 5.

¹³ As recently as 1995, one archivist researching archival appraisal asserted that the factors Bauer advanced for use in making appraisal decisions, particularly that of cost, were still considered somewhat suspect by many in

Building on the work of Brooks and Bauer, their colleague T.R. Schellenberg presented what became a lasting framework for archival appraisal in the United States and abroad. He articulated a detailed taxonomy of values inherent in records, which derived from the uses to which the records were put.¹⁵ Schellenberg distinguished between two main types of values: primary and secondary. Primary values were those associated with the uses for which records were originally created. He further subdivided primary values into legal, fiscal, and administrative values. In Schellenberg's schema, it was chiefly the secondary values with which archival appraisal was concerned, since records did not become archival until they were no longer needed by their creators for legal, fiscal or administrative purposes. Like primary values, secondary values were further subdivided into other values: evidential and informational. Evidential values were defined as those which documented the organization of the records creator and its functions; informational values, on the other hand, were conceived more broadly and related to such things as people with whom the records creator interacted and activities in which the organization was involved.

It is difficult to over emphasize the impact of Schellenberg's writings on appraisal theory and practice in the United States. Boles writes, "So influential was Schellenberg's work that for

the archival community. See Anne J. Gilliland-Swetland, "Development of an Expert System for Archival Appraisal of Electronic Communications: An Exploratory Study," (Ph.D. diss., University of Michigan -- Ann Arbor, 1995), 33.

¹⁴ For the realities of cost as a factor in appraisal decisions, see, for example, Frank Boles and Julia Marks Young, "Exploring the Black Box: The Appraisal of University Administrative Records," *American Archivist* 48 (Spring 1985): 121-135 and Boles, *Archival Appraisal*, especially 54-67. For a study of the role of use in the justification of appraisal decisions, refer to Mark Greene, "The Surest Proof: A Utilitarian Approach to Appraisal," *Archivaria* 45 (Spring 1998): 127-169. Finally, for an introduction to the importance of policy as a framework in which to make appraisal decisions, see F. Gerald Ham, *Selecting and Appraising Archives and Manuscripts*, Archival Fundamentals Series (Chicago: Society of American Archivists, 1993), particularly chapter 3.

¹⁵ For Schellenberg's chief contributions to appraisal thinking, see T. R. Schellenberg, *Disposition of Federal Records: How to Establish an Effective Program for the Preservation and Disposal of Federal Records* (Washington: National Archives, 1949) and T. R. Schellenberg, *The Appraisal of Modern Public Records: National Archives Bulletin #8* (Washington: National Archives, 1956).

almost 20 years research on the topic virtually stopped."¹⁶ A 1995 citation analysis of the archival literature between 1972 and 1994 identifies Schellenberg as by far the most frequently cited authority in the area of archival appraisal.¹⁷ Thus, after half a century, Schellenberg's pioneering works, developed from his experience at the National Archives, continue to exert a considerable influence on professional attitudes towards this function. The next section demonstrates that the values taxonomy developed by Schellenberg and his colleagues remains a central component within NARA's appraisal program today. The terminology of permanent and temporary values is that which archivists at NARA use to explain appraisal decisions through documentation resulting from this process.

Accounting for Appraisal at NARA

The researcher traveled to the National Archives and Records Administration in College Park, Maryland, in late July of 2003. During this site visit, NARA appraisal staff provided her with the *Standard Operating Procedures* that govern appraisal and ten disposition reports intended to reflect documentation representative of the appraisal process.¹⁸ NARA also provided the researcher with information relating to the Records Management Redesign that NARA was in the process of rolling out at that time. The discussion in this chapter reflects the appraisal process and documentation used by NARA prior to late 2003, as at the time this research was conducted, it was unclear exactly how the Records Management Initiative (RMI) would be implemented in terms of the appraisal function and how the documentation of this process might change as a result.¹⁹

¹⁶ Boles, *Archival Appraisal*, 6.

¹⁷ See Gilliland-Swetland, 88. This finding is of particular interest considering that Schellenberg had died in 1970 and had published his last major work on the subject of appraisal in 1956.

¹⁸ She made an additional trip to NARA in October in order to examine additional appraisal documentation available to the public through NARA's Record Group 64.

¹⁹ At the time of this research, NARA was in the process of launching its Records Management Initiative (RMI). This strategy was announced on July 31, 2003. Information about NARA's current approach to appraisal as

The researcher also interviewed seven archivists involved with appraisal in various capacities, ranging from the policy to the implementation levels, during the site visit to NARA. One of the interviewees had responsibility for the development and dissemination of appraisal policy, three were managers, and another three were appraisal archivists. In order to encourage full responses to questions posed by the researcher, she assured interviewees that they would not be identified by name or job title in the study report. In the account that follows, the archivists who participated in this study are identified as respondents NARA-1 through NARA-7. While interview responses focused largely on practices for conducting and documenting appraisal that were current in 2003, occasional remarks addressed appraisal practices and documentation at NARA in the past and speculated about how these might shift under the RMI following its implementation.

Program-level Documentation

At the time this research was conducted, NARA was in the process of adopting its first official appraisal policy.²⁰ A primary reason that NARA considered it important to develop a written policy framework for disposition decisions was the recognition that formalizing internal principles which guide decision-making would be valuable for appraisal archivists, particularly for new staff. Another impetus behind the decision related directly to demonstrating accountability for the appraisal function. NARA wanted to be able to provide the public with a rationale about how appraisal decisions are made and why it is appropriate to destroy many Federal government records when they are no longer needed for the conduct of agency business.

part of the RMI is outlined in NARA's "Strategic Directions for Federal Records Management" (July 31, 2003), accessed 3 November 2006, available from <http://www.archives.gov/records-mgmt/initiatives/strategic-directions.html>.

²⁰ Work on this policy began in early 2003, with NARA soliciting comment from the archival community, researchers, and the public by circulating drafts of the policy document and posting it on the institution's website. This appraisal policy was officially adopted in May 2006, being issued as NARA Directive 1441. See "Strategic Directions: Appraisal Policy," accessed 3 November 2006, available from <http://www.archives.gov/records-mgmt/initiatives/appraisal.html>.

One interviewee referenced a controversy that had resulted from the disposition of scientific notebooks at the Naval Research Laboratory in 1997,²¹ noting that, “[T]he public wanted proof of how we made that decision and why we thought those records could be destroyed...we actually had all the information we needed for that...but we wanted to be able in advance to put out a set of guidelines for what NARA would deem as permanently valuable and what records we thought could be destroyed at some point.”²² The respondent further noted that the draft appraisal policy represented a codification of the principles that had long guided NARA’s appraisal decisions, but also an effort to articulate more specific criteria and to define a common terminology that could be understood by agency personnel, researchers, and the public.

The Life Cycle Management Division is the unit at NARA charged with responsibility for appraisal. The unit is organized into six work groups, each of which is tasked with appraising the records of designated agencies.²³ The process which the Life Cycle Management Division employs to discharge this function is spelled out in the unit’s *Standard Operating Procedures* (SOPs), which provide a broad level of documentation for the appraisal process. These SOPs are not available through NARA’s website due to a perception that the public is not interested in the appraisal at this level of granularity. NARA does not consider the SOPs related to appraisal to be protected or privileged information, however, and is willing to provide a copy of this manual to interested parties upon request. The following account of the appraisal process and its associated documentation relies on an examination of the Life Cycle Management Division’s SOPs and the appraisal reports, supplemented by interviews with NARA staff.

²¹ NARA’s inquiry into this case is available online. See “Inquiry into the Disposal of Records of the Naval Research Laboratory Stored at the Washington National Records Center (April 24, 1998), accessed 3 November 2006, available from <http://www.archives.gov./records-mgmt/policy/inquiry-records-disposal.html>. This case will be discussed in the “Accountability in Appraisal” section of this chapter.

²² Respondent NARA-1, interview by author, July 29, 2003.

²³ In July of 2003, there were thirty-seven archivists and five supervisors responsible for appraising the records of the federal government.

Initiating the Appraisal Process

Appraisal at NARA is currently an agency-driven process, rather than an archives-driven process. Agencies submit proposed disposition authorities to initiate appraisal jobs.²⁴ Getting records schedules in place is a collaborative venture shared among NARA and Federal agencies. In accordance with the Federal Records Act, the Archivist of the United States, through his delegated staff, provides agencies with guidance on preparing and submitting records schedules to NARA.²⁵ Ideally, agency records management staff consult with the assigned appraisal archivist at NARA in the preparation of records disposition authorities, as properly prepared requests can be processed more expeditiously than those which require subsequent consultation with and clarification from the agency before NARA can act on the request. Agencies request disposition authorities for particular records series, rather than for the records of the entire agency, though ultimately the heads of agencies subject to the Federal Records Act are required to submit schedules covering all agency records.

When an agency submits a Request for Records Disposition Authority (SF 115), the appropriate appraisal work group leader assigns it to an appraiser to be reviewed. The goal of this preliminary assessment is to determine if the proposed authority is a reasonable request which contains all the elements required for a records disposal authority. NARA's SOPs indicate that requirements for records schedules are articulated in 36 Code of Federal

²⁴ A records disposition authority is the instrument which authorizes the heads of Federal agencies to legally dispose of records no longer needed for the conduct of business. In cases where records series are deemed to have historical value, the records disposition authority provides for their transfer to NARA in a timely manner. Records disposition authorities are also referred to as records schedules.

²⁵ NARA provides such guidance through records management training for Federal employees, as well as through a variety of tools available on its website. Of particular relevance is NARA's handbook, *Disposition of Federal Records: A Records Management Handbook*, available from <http://www.archives.gov/records-mgmt/publications/disposition-of-federal-records/index.html>, accessed 3 November 3, 2006.

Regulations, §1228, Subpart B, and contains an appendix to this document.²⁶ Important elements of information that must be included on the 115 are clear descriptions of the activities documented in the records series listed on the schedule, the time span represented, the media of the records, and disposition instructions that can be easily implemented. Another key piece of information is whether the records for which disposition authority is sought require concurrence from the General Accounting Office (GA) before the Archivist can approve the records schedule.²⁷

In addition to reviewing the content on a proposed Request for Records Disposition, appraisal archivists make other preliminary assessments that might have a bearing on the appraisal. One archivist stated, “We also look at it [the SF 115] as far as ease and suitability for being processed. In other words, is this a job we want to do as one disposition request or is this something that, because it’s so bulky, maybe we’ll split up.”²⁸ Another clarified, “[A]s long as it meets kind of this minimal standard and there’s nothing so seriously wrong with this that we just can’t even begin working on it, we register it.”²⁹ Appraisal archivists can make minor clarifications or corrections to disposition requests, provided that such changes are documented in the job dossier. Requests that require substantial revision, however, are generally returned to the agency’s records management officer to be reworked and resubmitted.

²⁶ See NWML *Standard Operating Procedures* (1999), Chapter 1: Appraisal and Disposition, 1-3 and Appendix 1.

²⁷ This is one section of the SF-115 that could be clarified. The current form indicates that Title 8 of the General Accounting Office’s *Manual for the Guidance of Federal Agencies* requires the GAO to approve the disposal of certain types of Federal records, particularly those that might be needed in legal action initiated by or against the government. A note on GAO’s website, however, indicates that this publication is no longer available, and provides points of contact for areas that were previously addressed in the *Manual for the Guidance of Federal Agencies*. This site indicates that GAO approval is required when an exemption from a NARA records retention schedule is sought. See “GAO Policies and Procedures Manual for Guidance of Federal Agencies,” accessed 3 November 2006, available from <http://www.gao.gov/special.pubs/ppm.html>.

²⁸ Respondent NARA-5, interview by author, July 30, 2003.

²⁹ Respondent NARA-2, interview by author, July 30, 2003.

Requests for disposal authorities that meet initial review requirements are then officially registered in NARA's Control and Tracking System and assigned a job number. At this point, the appraisal archivist circulates the SF 115 to relevant stakeholder units (SHUs) within NARA. These are units which might be interested in or impacted by disposition decisions regarding particular records (e.g., divisions responsible for processing and declassification; reference; special media records; and regional and national records services). Appraisal archivists forward proposed disposition authorities, along with a Request for Stakeholder Unit Action, to each SHU for all types of records which fall within its purview. A table available to appraisers in the SOPs lists each SHU and those types of records which the SHU has indicated that it is *not* interested in; SHUs review this document periodically to ensure that it is still accurate. This tool guides appraisers in determining which SHUs must receive a copy of a particular SF 115 and a Request for Stakeholder Unit Action.

SHUs then return the completed Request for Stakeholder Unit Action to the appraisal archivist, indicating how involved they would like to be in the particular appraisal job. They can indicate whether they would like to participate in conducting the appraisal, review the appraisal recommendations before a final decision is made, whether they would like a copy of the completed job, or whether they do not need to play a part in this appraisal. Interviews with NARA staff revealed that SHUs seldom choose to participate in appraisal decisions. One respondent stated, "In almost no instances that I'm aware of have they actually wanted to take part in appraisal. They just have too much other work, or maybe they're just not interested, but to the extent that other units do take part, it's usually at our request."³⁰

³⁰ Respondent NARA-2, interview by author, July 30, 2003.

*Documentation of Appraisal Decisions*³¹

Once the preliminary activities associated with disposition requests (i.e., review, registration, and assessment of SHU involvement) are concluded, the appraisal archivist then conducts the appraisal. This entails making an appointment through the agency contact representative designated on the SF 115 for the appraiser to examine the records. The appraiser might also speak with records management or program personnel in the agency to resolve questions about the records for which disposal authority is sought. A critical part of the appraisal process involves researching any legal requirements associated with the records and previous disposal authorities approved by the Archivist that might pertain to the items included on the proposed disposition authority. In cases where the records to be appraised are thought to be of special interest or potentially controversial, the appraisal archivist might determine that input from external stakeholders (e.g., scientists, historians, genealogists) should be sought and factored into disposition recommendations, although this is not mandated by law or by the SOPs.³² The end product of the appraisal of a proposed disposition authority is the appraisal memorandum, or appraisal memo.

NARA staff regard appraisal memos as the central piece of disposition documentation, as they provide the justification for disposition decisions. The function of the appraisal memo, when examined along with the disposal authority, is:

[T]o make clear to an objective reader why NARA is taking the position it's taking. It has to provide enough information...as to why the records that are proposed as permanent are indeed permanent, why the temporary records are indeed temporary. And in the case of temporary records, why the retention period

³¹ Due to the large volume of appraisal documentation produced by NARA, this section discusses only the documentation of appraisal decisions related to the operational records of individual government agencies. Documentation related to general records schedules, which apply to common administrative records produced by multiple government agencies, can be found on NARA's website at <http://www.archives.gov/records-mgmt/ardor/>, accessed 3 November 3, 2006.

³² This practice was noted by Respondent NARA-1, interview by author, July 29, 2003; Respondent NARA-2, interview by author, July 30, 2003; and Respondent NARA-6, interview by author, July 30, 2003.

that we're proposing and whether we're agreeing or disagreeing with the agency, is appropriate to protect legal rights and guarantee government accountability....the bottom line is that if somebody looks at the schedule and looks at the appraisal report, they can say, yes, that's not arbitrary and capricious. This is NARA making a reasoned case for whatever it is we are proposing.³³

Appraisal memos can vary greatly in length depending on the records for which a disposition authority is requested. For a simple appraisal job, the memo can be brief and may consist of only a few paragraphs. For more complex appraisals, the report may need to be many pages.

Individual appraisers are given discretion in preparing appraisal memos regarding what and how much information is required to justify the appraisal recommendations that they are making.

There is no standard format for appraisal memos and individual appraisers develop preferred styles of writing these documents, but certain types of information are considered essential in explaining appraisal recommendations. Appraisal memos characteristically provide a description of the agency which is requesting the records disposal authority, along with its responsibilities; a description of the records, based on the archivist's examination and conversations with agency personnel (of particular interest are the relationships among the records listed on the proposed authority with other agency records and with the records of other Federal government agencies); and the appraiser's recommendations for disposition. The appraiser may concur with the agency's proposed retention period for certain items (or records series) listed on the schedule and disagree with others. In some cases, appraisal archivists may conclude that records that the agency designates as temporary are in fact permanent, or vice versa. The key piece of information in the appraisal memo is considered to be the appraising archivist's assessment of whether the records in each item on the records schedule are permanent or temporary. For records appraised as permanent the reports tend to be more Spartan, as little

³³ Respondent NARA-2, interview by author, July 30, 2003.

justification is considered necessary to support this evaluation. For records appraised as temporary, however, and consequently slated for destruction when they are no longer needed for the conduct of agency business, greater explanation is given in support of the appraisal decision.

After the appraisal memo is written, the appraiser forwards it to the SHUs which indicated that they would like to review the appraisal recommendations before they are finalized. After they have examined the appraisal report, SHUs return the internal review form to the appraiser indicating whether they concur with the disposition suggestions. If SHUs have a concern regarding the recommendations, these issues are addressed and resolved and the appraisal memo is revised before the Request for Records Disposal Authority is forwarded up NARA's chain of command for approval. The appraisal archivist determines what documentation resulting from this internal concurrence process (e.g., memos; e-mail print-outs; notes of telephone conversations) is substantive and should therefore be included in the appraisal dossier.

Once the proposed records schedule and appraisal memo are complete, the appraisal archivist prepares a notice of the proposed records disposition authority to be printed in the *Federal Register*. NARA is required by law to provide public notice through the *Federal Register* of any request for a disposal authority that contains records appraised as temporary.³⁴ The Life Cycle Management Division's SOPs provide guidance to appraisers on the preparation of these announcements. Notices must contain the name of the agency requesting a records disposition authority; the name of the agency component to which the schedule applies (or whether it is an agency-wide functional schedule); the NARA job number; the total number of

³⁴ The timing of the initiation of the *Federal Register* process varies. Since it can take up to ninety days from the time a notice is prepared, reviewed, and published, appraisal archivists start this procedure as soon as the disposal job has been entered in the Control and Tracking System for schedules that can be processed quickly. This includes schedules that "propose the disposal of hitherto unscheduled series where the records clearly are temporary, or relate only to electronic copies of scheduled records." See SOPs, 1-5 and 1-6.

items listed on the schedule; the number of temporary items; and a short description of the content of the records.³⁵ The public has forty-five days from the publication of the notice of the Request for Records Disposition Authority in the *Federal Register* to request a copy of the proposed schedule. Any interested party may request this; in most cases, NARA will also provide the appraisal memo. A requestor has thirty days from the date NARA provides them with the proposed authority to make written comments, to which NARA is legally required to respond. Theoretically, an exchange of comments between NARA and a requestor could become quite lengthy. In reality, however, few requests to examine a proposed records authority are received. These tend to be from special interest groups or scholars with particular research areas.

Once the *Federal Register* process has been concluded, the completed appraisal dossier – containing the initial proposed request for a records disposition authority, SHU documentation, appraisal memo, any documentation related to the *Federal Register* notice, and any communication between the appraisal archivist and agency or any internal discussion of the records that the appraisal archivist deems significant – is forwarded up NARA’s internal concurrence line for review. One interviewee described this process as follows, “[I]f you are an appraisal archivist, you write your memo, your work group leader reads it, your supervisor reads it, your office head reads it, the deputy division director reads it, the division director reads it, the Deputy Archivist reads it, and then Archivist signs it [after review].”³⁶ The Archivist also receives a Recommendation to the Archivist on Records Disposition Request – a Form 13133 – which serves as a summary document that provides an abbreviated version of the information contained in the appraisal memo. The SF 13133 also indicates the date on which the job’s

³⁵ NWML SOPs, 3.3 and Appendix 7.

³⁶ Respondent NARA-5, interview with author, July 30, 2003.

Federal Register notice was published (if this notice was required), how many copies of the authority were requested, and how many comments were received. The form recommends proposed courses of action to the Archivist: that the records are approved for disposal; that the records are approved for permanent retention; that the records are not approved for disposal; and that some portion of the records proposed for disposal have been withdrawn, at the request of NARA and/or the agency. A single SF 13133 can suggest more than one of these actions, as the form provides for the designation of the items as listed on the Request for Records Disposition Authority following each option. Finally, the recommendation to the Archivist contains the signatures of the appraisal archivist and the Director of the Lifecycle Management Division, as well as any required internal concurrences from SHUs.

On rare occasions, the Archivist may raise a question related to the Records Disposition Authority and the appraisal recommendations. One appraiser who has been working in the Lifecycle Management Division for a number of years commented, “I have never had the sitting Archivist send back a job because he wasn’t happy...maybe twice I’ve had questions from the Archivist. Other appraisal archivists have gotten stuff back. The Archivist does not agree with your appraisal. Go out and look at this stuff again.”³⁷ Another indicated that appraisers strive to ensure comprehensive documentation due to “the fear that the Deputy Archivist or the Archivist will look at something and ask a question about it. [The appraiser] views that as a terrible thing if it does happen, a reflection on the quality of the process.”³⁸ In most cases, though, the recommendations presented to the Archivist are followed and the authority is signed, as the request has been reviewed several times at various management levels as it makes its way up the chain of command. In cases where a question does arise, any communication between the

³⁷ Respondent NARA-5, interview by author, July 30, 2003.

³⁸ Respondent NARA-2, interview by author, July 30, 2003.

Archivist of the United States and the appraisal archivist in addressing that concern becomes a part of the official record.

Accountability in Appraisal

Interviews with NARA staff reflect an awareness of accountability for archival appraisal. This sense of accountability is rooted in NARA's statutory responsibility for records disposition. Notes one interviewee, "Just because the agency has proposed [a records schedule] doesn't mean that we rubber stamp the agency's decision....The National Archives decides what's permanent, not the agency."³⁹ While the Archivist of the United States ultimately accounts for the disposal of records deemed to have temporary value, and thus for the retention of those judged to possess permanent value, he delegates much of the appraisal function to archivists in the Life Cycle Management Division. One archivist observed that in conducting appraisals and presenting recommendations to the Archivist about proposed records disposition authorities, "We do view our role in this as the Archivist's agent. It's a recommendation to the Archivist and we are essentially acting as his staff."⁴⁰

The internal imperative to justify appraisal recommendations not only to the Archivist, but to successive levels of management within NARA, impacts practices for documenting appraisal. The archival record of disposition activities shifts over time to reflect changing policy initiatives and organizational administration.⁴¹ NARA archivists observed that the practices for documenting appraisal at the time of this study reflected the current objectives of the institution's appraisal program and the preferences of management. While an historical examination of practices for documenting appraisal is beyond the scope of this study, the differences noted by

³⁹ Respondent NARA-5, interview by author, July 30, 2003.

⁴⁰ Respondent NARA-2, interview by author, July 30, 2003.

⁴¹ This reality was noted by four of the seven archivists interviewed: Respondent NARA-2, interview by author, July 30, 2003; Respondent NARA-5, interview by author, July 30, 2003; Respondent NARA-6, interview by author, July 31, 2003; and Respondent NARA-7, interview by author, July 31, 2003.

the archivists who were interviewed for this research provide additional context for understanding NARA's appraisal documentation as described in this chapter.

The interviews revealed that the archival record produced in the course of the appraisal process at the time of this study was more detailed than that resulting from appraisal as it was conducted in the 1970s and early 1980s, when the priority of NARA's appraisal program was on getting records schedules in place for Federal agencies as quickly as possible in order to address the large volume of unscheduled temporary records. This objective impacted how appraisal was conducted at that time, which in turn impacted the documentation resulting from the appraisal process. By the early 1980s, as a result of litigation resulting from NARA's appraisal FBI records, appraisal documentation had begun to reflect more detail, in order to justify why the retention periods proposed by NARA were adequate for temporary records. With controversy stemming from the disposal of Naval Research Laboratory notebooks in 1997, NARA's management developed a renewed concern with demonstrating accountability in appraisal decisions.

Respondent NARA-6 stated that since the late 1990s, the Deputy Archivist and the Archivist have been requesting more detailed descriptive information in appraisal documentation. This interviewee observed that the biggest change in appraisal documentation under Archivist John Carlin was to the Recommendation to the Archivist (NA 13133).⁴² Whereas previous Archivists had expected a summary of a couple of sentences on the 13133, Carlin required a précis of the appraisal memo. The Recommendation to the Archivist, therefore, was to capture not just the result of the appraisal (i.e., the recommendation as to

⁴² John Carlin was the Archivist of the United States at the time of this study, serving in this capacity from 1995 through early 2005. In February, 2005, Allen Weinstein became the ninth Archivist of the United States. The information presented in this chapter, therefore, may not provide an adequate reflection of the current Archivist's preferences for appraisal documentation.

whether records on a proposed schedule were temporary or permanent), but to reflect a justification for the recommendations.⁴³ Another requirement of NARA management at the time of this study was that all recommendations to the archivist reflect NARA's responsible conduct of appraisal. Many appraisal memos generated in recent years contain the statement, "All retention periods are adequate from the standpoint of government accountability and the protection of legal rights. There have been no internal or external controversies." This was language was considered essential by Archivist John Carlin.⁴⁴

Congress has mandated that NARA will be accountable to the public for its appraisal decisions. The Federal Records Act of 1950 calls for interested parties to be offered the opportunity to provide comments on proposed records schedules.⁴⁵ The mechanism through which NARA seeks outside input into appraisal decisions is the *Federal Register* process, in which notices of pending disposition authorities are published for public comment. NARA sends copies of a schedule to any requestors, along with the appraisal memo in most cases.⁴⁶ Whenever comments are received, NARA responds to them. Sometimes the comments that are received result in another appraisal of the records, which may result in NARA standing by its disposition recommendation, or changing or making modifications to the initial recommendation. The appraisal archivists interviewed as part of this research concur that it is rare for copies of a records schedule and the appraisal memorandum to be requested as the result of the *Federal Register* process. Their experience has been that it is still less common for comments to be received following the provision of these documents to a requestor. The majority of requests and

⁴³ Respondent NARA-6, interview by author, July 31, 2003.

⁴⁴ Respondent NARA-2, interview by author, July 30, 2003.

⁴⁵ See 44 United States Code, Chapter 33, §3303a.

⁴⁶ For proposed disposition authorities dealing with classified records, NARA has the discretion not to release the appraisal memo, should it contain sensitive information.

comments come from two or three individuals who represent public interest groups or who have specific research areas.

One archivist interviewed reiterated that the law delegates responsibility for disposition decisions to NARA. Respondent NARA-7 then pointed out that the *Federal Register* process applies only to temporary records, noting that this implies that the government, and by extension the public, trusts that archivists are professionally competent to make decisions as to which records have permanent value. The interviewee believes that this could be considered to beg the question of why the government and the public do not trust archivists to make temporary value determinations as well. The answer to such a question is that the *Federal Register* process is a safeguard to increase the likelihood that sound appraisal decisions will be reached.⁴⁷

The consensus that the appraisal archivists at NARA presented during interviews with the researcher is that on the whole (cases such as the FBI records appraisal and the disposal of Naval Research Laboratory notebooks aside), the public does not understand the appraisal process and is not especially interested in it. These beliefs stem in part from their views regarding public misperceptions about archives and the infrequency of public requests for proposed disposition authorities as part of the *Federal Register* process. One respondent addressed the public's level of awareness about records disposition in the following terms, "If you ask the typical person on the street, 'What happens to Federal records?,' [he or she thinks] that every record the Federal government has ever produced is filed away somewhere."⁴⁸ Two interviewees noted that ample information that explains the reasons behind records disposition and the appraisal process is

⁴⁷ Respondent NARA-7, interview by author, July 31, 2003.

⁴⁸ Respondent NARA-2, interview by author, July 30, 2003. This interviewee noted that genealogists might be an exception to this rule, as they can be very sophisticated in their understanding of records issues. The respondent offered the opinion that genealogists generally have a better understanding of the *Federal Records* process than do many professional historians, and are well organized to mobilize responses to proposed records schedules.

available on NARA's website, particularly through the Records Management page which is geared at employees in Federal agencies, but acknowledged that one means by which NARA could make the appraisal process more comprehensible to the general public is through a reorganization of its website.⁴⁹

The appraisal archivists who participated in this study believe that the *Federal Register* process offers the public an adequate forum to offer comments on proposed disposition decisions. They recognize that there is a limited public which reads the *Federal Register*, but one respondent made the point that, as in the interaction between citizens and other Federal agencies, ultimately the public has to choose to become involved in the process.⁵⁰ Two interviewees voiced concerns that soliciting feedback through alternate mechanisms, such as via records schedules posted online, would adversely impact workflow within the Life Cycle Management Division by slowing down the appraisal process as NARA responded to public comments.⁵¹ They consider that this would be a disservice to the Federal agencies which NARA serves, which need to have requests for disposal authorities approved expeditiously. The approval process for records schedules is already a lengthy process which takes months (and even years in cases where there are complex appraisals necessitating a great deal of

⁴⁹ Respondent NARA-1, interview by author, July 29, 2003 and Respondent NARA-2, interview by author, July 30, 2003. NARA's main records management webpage is available at <http://www.archives.gov/records-mgmt/>, accessed 3 November 3, 2006.

⁵⁰ Respondent NARA-3, interview by author, July 30, 2003.

⁵¹ Respondent NARA-6, interview by author, July 31, 2003 and Respondent NARA-7, interview by author, July 31, 2003. Part of this concern appears to stem from the appraisal of records created during Census 2000. The Census Bureau needed an expedited disposition authority to cover millions of paper long and short forms that were being received, because of their massive volume and the expense required to maintain them. The forms themselves were being digitized, and the images were to be maintained in a permanent database. What the Census Bureau requested was authority to dispose of the paper forms following digitization. This was an historic case, because it marked the first time that NARA bypassed the usual *Federal Register* process to eliminate the lengthy editing and review process. In this case, NARA posted the proposed records schedule online, and at the same time sent it to social scientists and other interested parties, requesting public comment. During this review process, NARA was criticized for the proposed temporary status of the paper census forms, as people erroneously assumed that the digital images were missing critical marginalia from the paper forms. As a result of these assumptions, Congress became involved. The effect of this public and Congressional interest was that NARA altered what it considers to have been a sound appraisal decision and reappraised the paper forms as permanent.

communication between NARA and the agency or when internal or external controversies arise).⁵² In terms of the documentation that NARA produces to account for its appraisal function, one archivist summarizes, “The bottom line is that [records schedules and appraisal memos] are available. We don’t go out and publicize, but we certainly don’t hide. Anybody who does approach us, we’re very glad to give them a copy.”⁵³

As mentioned previously, NARA’s current and emerging practices for documenting appraisal activities derive in part from two instances in which NARA was called to account for its selection activities: the FBI records appraisal in 1979 and the disposal of Naval Research Laboratory notebooks in 1997. Chapters One and Two of this dissertation introduced an appraisal controversy that sparked a court case in 1979 regarding the then National Archives and Records Service’s appraisal of FBI records. At issue was whether NARS, in accepting the FBI’s assertion that records on a proposed authority were temporary without conducting an examination of those records, placed the interests of the FBI ahead of the public interest in these records. In response to the criticisms raised by this litigation, the National Archives and Records Service developed a detailed appraisal methodology for sampling the large volume of records under consideration.⁵⁴ The FBI case has imprinted itself on the collective consciousness of appraisal archivists at NARA, in both the conduct and documentation of the disposition function. One archivist summarizes the lesson that the National Archives and Records Service took away from its experience with the FBI records appraisal in the following terms:

[T]he court told us, you could be in violation of the Administrative Procedures Act, which talks about not being arbitrary and capricious, if you don’t have the

⁵² The SOPs for the Life Cycle Management Division indicate that NARA aims to approve routine disposition requests within 120 days and more complex jobs within 240 days.

⁵³ Respondent NARA-2, interview by author, July 30, 2003.

⁵⁴ See James Gregory Bradsher, “The FBI Records Appraisal,” *Midwestern Archivist* 13:2 (1988): 51-66 and Susan D. Steinwall, “Appraisal and the FBI Files Case: For Whom Do Archivists Retain Records?,” *American Archivist* 49 (Winter 1986): 52-62.

documentation [to justify disposition decisions]. The court also made explicit that NARA was ultimately responsible for ensuring that the retention period for temporary records was correct. Prior to that case, even though the law was pretty clear on it, we were saying, 'The agency says it just needs these for five years, fine with us.' Well, the court said, that shouldn't be fine with you. You have to do a critical review of this. So, the result was certainly that by the mid-80s, the documentation gets much better.⁵⁵

Subsequent to the FBI litigation, NARA has produced appraisal documentation intended to clearly demonstrate that it has fulfilled its statutory responsibility for verifying that records that an agency proposes as temporary are indeed temporary, even when dealing with agencies that produce classified records. The standard that appraisal memos, in conjunction with records disposal authorities, are to meet is to make apparent to interested parties that NARA's retention decisions are well reasoned and based on professional judgment, not arbitrary and capricious.

While the FBI case resulted in changes to the manner in which disposition decisions are documented through appraisal memos, the public controversy in 1997 stemming from the disposal of Naval Research Laboratory records at the Washington National Records Center impacted the documentation of NARA's appraisal process and criteria at the policy level. In November 1997, the Chief of Naval Research wrote to the Archivist of the United States to express concern that historically important scientific and technological notebooks had been destroyed in accordance with a records disposition authority approved by NARA. At issue was that these records had initially been scheduled as permanent and sent to the Washington National Records Center (WNRC) with the expectation that they would remain permanent. During a review of the records by NARA staff at the WNRC, it was determined that notebooks from the Naval Research Laboratory did not meet all of the criteria specified by the Navy's appraiser. Thus, the records were recoded as temporary and scheduled for disposal. The WNRC sent the

⁵⁵ Respondent NARA-2, interview by author, July 30, 2006.

archivist at the Naval Research Laboratory a copy of the report indicating this change in status. When the time came for the accessions to be destroyed, notice of the impending disposal was sent to the Navy records officer. Since NARA received no communication from the Department of the Navy to the contrary, the notebooks were disposed of as scheduled. NARA's internal inquiry into the disposal of these records revealed that NARA had appraised and disposed of the notebooks in accordance with established policies and procedures. Due to the miscommunication involved in the implementation of this records schedule, however, NARA revised its procedures surrounding records disposal to require positive concurrence from agency records management staff prior to the implementation of records schedules.⁵⁶ One finding that did result from NARA's investigation into the disposal of the Naval Research Laboratory notebooks is that the notice published in the *Federal Register* to invite public comment on the proposed schedule inadequately described the records listed on the disposal authority. As a result, clearer directives for preparing a *Federal Register* notice were provided to appraisal archivists through the Life Cycle Management Division's SOPs in order to make such notices more comprehensive.

Summary

This chapter discussed NARA's statutory authority for records disposal activities and considered the institution's contributions to the archival profession's understanding of appraisal. It also provided an overview of practices for documenting appraisal at NARA. At the time of this study, NARA's documentation mirrored the appraisal process closely. The official file on an appraisal job contains forms, reports, and communication corresponding to each step along the way to an approved records schedule signed by the Archivist of the United States. Appraisal

⁵⁶ NARA's inquiry into this case is available online. See "Inquiry into the Disposal of Records of the Naval Research Laboratory Stored at the Washington National Records Center (April 24, 1998), accessed 3 November 2006, available from <http://www.archives.gov./records-mgmt/policy/inquiry-records-disposal.html>.

dossiers provide an audit trail explaining appraisal decisions for the purposes of institutional, legal, and historical accountability. The *Federal Register* process mandated in the Federal Records Act of 1950 serves as a mechanism by which the public can comment on proposed records disposition, thus providing input into appraisal decisions. The next chapter examines appraisal documentation produced at Library and Archives Canada.

CHAPTER FIVE

APPRAISAL DOCUMENTATION AT LIBRARY AND ARCHIVES CANADA

This chapter is the second of three that addresses the first research question posed in this study: How is appraisal documented? The institutional context for Chapter Five is the Government Records Disposition Program (GRDP) at Library and Archives Canada (LAC), which appraises public records on behalf of the Librarian and Archivist of Canada.¹ This case study begins with an overview of LAC's statutory authority for appraisal and a review of significant contributions that LAC has made to the archival profession's understanding of appraisal. The emphasis of this chapter is an explanation of practices for documenting appraisal at LAC that were current in fall 2003. The final portion of the chapter discusses accountability in appraisal at LAC, as reflected in the written record produced by archivists in the GRDP to guide the appraisal process and to provide a rationale for disposition decisions. Remarks drawn from interviews with LAC staff who participate in various aspects of appraisal supplement this account of appraisal at LAC.

LAC's Statutory Authority for Records Disposition and Appraisal

Formally established in 1912 by the Public Archives Act, the archival program which has evolved into Library and Archives Canada owes its origins to two predecessor institutions: the Archives Branch of the Department of Agriculture and the Records Branch of the Department of

¹ The Government Records Disposition Program has been restyled the Government Records Appraisal and Disposition Program since the time of this study. This account uses the division's previous name, which was current in 2003. Library and Archives Canada is the current name for the organization that preserves and provides access to Canadian cultural heritage resources, including the archives produced by the government of Canada. Established in 1912 as the Public Archives of Canada, this institution became the National Archives of Canada in 1987. At the time of this study in late 2003, the National Archives of Canada was in the midst of merging with the National Library of Canada. Although Library and Archives Canada was not adopted as the organization's official name until the passage of the Library and Archives Canada Act in 2004, this study alternately refers to the institution as the National Archives of Canada and Library and Archives Canada, which reflects the usage of archives staff in September, 2003.

the Secretary of State.² The former was founded in 1872, placing its emphasis on the collection of materials scattered across Canada and the copying of records held in archives throughout Europe relevant to the history of Canadians. Its goal was to build a sense of national identity and patriotism following Confederation, which had occurred in 1867, through promoting the study and use of archival materials for the writing of history. The latter had been created at Confederation to care for records produced by government; its responsibility, therefore, was considered to be primarily administrative. Within several years of the establishment of the Archives Branch, a controversy arose as to which of these agencies should properly be the custodian of government records, the Archives Branch contending that in order to meet its mandate to document Canada's cultural heritage, it was necessary to acquire records from public as well as private sources. For nearly thirty years, an acrimonious relationship existed between the Records Branch of the Department of the Secretary of State and the Archives Branch of the Department of Agriculture, before the latter prevailed and subsumed the former in 1903. Thus, the Archives Branch can be considered the immediate parent organization of the Public Archives of Canada (PAC), which was created by statute and placed under the direction of the Secretary of State in 1912.

Due in part to this lengthy uncertainty regarding the appropriate responsibility for the care of government records, PAC only slowly developed a public records program and was

² This brief overview of the development of Canada's national archival institution is drawn from the following sources: Jay Atherton, "The Origins of the Public Archives Records Centre, 1897-1956," in *Canadian Archival Studies and the Rediscovery of Provenance*, 85-108, ed. Tom Nesmith (Metuchen, NJ: The Scarecrow Press, Inc., 1993); Ian Wilson, "'A Noble Dream:' The Origins of the Public Archives of Canada," in *Canadian Archival Studies and the Rediscovery of Provenance*, 61-84, ed. Tom Nesmith (Metuchen, NJ: The Scarecrow Press, Inc., 1993); and Ian E. Wilson, "The Fine Art of Destruction Revisited," *Archivaria* 49 (Spring 2000): 24-139. Information pertinent to legislation regarding the disposition of records in Canada was also derived from interviews conducted by the researcher at LAC in September, 2003, particularly Respondent LAC-1, interview by author, September 8, 2003 and Respondent LAC-2, interview by author, September 8, 2003. For more details about these interviews, refer to the discussion of methodology in Chapter 3 and the "Documentation of Appraisal Decisions" section in this chapter.

granted legislative authority for government records. As early as the late 1880s, government agencies were feeling the burden of the accumulation of government records. Initially, the Treasury Board had the sole legal authority to grant disposition of public records. In 1889, it approved the first “records schedule” for the disposition of Post Office records. At this time, the Treasury Board called on all departments of the government to prepare lists of records no longer needed for the conduct of business and to submit those lists to the Treasury Board to be approved for disposal; however, it did not follow up on this appeal, and the development of a records disposition program foundered. In 1897, following a fire that destroyed government records, many of which were in inactive storage, a Treasury Board commission again looked at the issue of the disposition of government records. This was a pattern that would be repeated by other committees and concerned parties in 1914 and 1929.

By 1933, the problem of the growing volume of government records could no longer be deferred, and sustained efforts were initiated that ultimately resulted in a planned program for providing for the disposal of public records no longer needed for business and the transfer of records of historic significance to the Public Archives of Canada. The Treasury Board directed deputy ministers of government departments to identify records which could be destroyed after five years or ten years and to identify those that would be required indefinitely.³ In 1936, the Treasury Board authorized the destruction of a number of records, with the provisions that records pertaining to the service of government employees be retained permanently, as well as documents that might possess historical value. Under this system, departments were required to notify the Dominion Archivist of their intent to destroy any records and to allow him six months to determine if any of the records proposed for disposal were appropriate for transfer to PAC. In cases where the departments and the Dominion Archivist could not reach an agreement regarding

³ Atherton, 95-96.

the potential archival value of records, the Treasury Board would review the matter and issue a decision. Thus, 1936 marks the beginning of PAC's legislative responsibility to select records of historic importance for transfer to the archives, although the Treasury Board retained the sole authority to approve the disposal of government records. The Treasury Board remained responsible for authorizing the destruction of records through 1945.

An Order in Council passed in 1945 established a permanent Committee on Public Records, which reported to the Treasury Board, to oversee the orderly disposal of government records. Librarian and Archivist of Canada Ian Wilson writes, "It is highly enlightening and revealing to note just how seriously the business of records destruction was considered at this time. In addition to the Dominion Archivist, the membership of the Public Records Committee was composed of some of the government's most senior bureaucrats, including the Secretary of the Treasury Board and the Comptroller of the Treasury, the Deputy Minister of Public Works, and the Under-Secretary of State for External Affairs."⁴ Representatives of the Canadian Historical Association also served on the committee.⁵

The Public Records Committee's authority for the disposal of government records remained in effect until the passage in 1966 of the Public Records Order. Effective with the legislation, the Dominion Archivist was charged with the sole responsibility to authorize the destruction of government records, as well as with the selection of records of national significance which should be transferred to the Public Archives. As part of these appraisal exercises, archivists worked with agencies to determine appropriate retention periods for government records, which were reflected in records disposal authorities issued during this era of PAC's disposition program.

⁴ Wilson, "Fine Art," 128-129.

⁵ Atherton, 98.

The next phase in records disposal and selection was ushered in with the passage of the National Archives of Canada Act in 1987. This legislation transformed the Public Archives of Canada into the National Archives of Canada (NAC), which was to be under the direction of the National Archivist of Canada. Under this statute, the Archivist retained statutory authority for the disposal of government records and the transfer of records with historical value to NAC. Section 5(1) states, “No record under the control of a government institution and no ministerial record, whether or not it is surplus property of a government institution, shall be destroyed or disposed of without the consent of the Archivist.”⁶ The corresponding authority to select records of national significance for transfer to the archives when they are no longer needed by the agency for legal or operational purposes is spelled out in Section 6(1): “The records of government institutions and ministerial records that, in the opinion of the archivist, are of historic or archival importance shall be transferred to the care and control of the Archivist in accordance with such schedules or other agreements for the transfer of records as may be agreed on between the Archivist and the government institution or the person responsible for the records.”⁷ The Archivist is assisted in making decisions related to the disposal and transfer of government records to NAC by staff in the Government Records Disposition Program (GRDP), who appraise records created by government agencies and make recommendations to the Archivist regarding which records possess “historic or archival importance” and which do not, but the Archivist has the sole legal authority to approve these evaluations through signing a Records Disposal Authority on behalf of NAC. A significant aspect of the National Archives of Canada Act is that it formally requires records schedules and agreements for the transfer of records to be negotiated

⁶ See §5(1) of the National Archives of Canada Act (1987, c. 1), accessed 3 November 2006, available from <http://laws.justice.gc.ca/en/n-2.5/text.html>.

⁷ See §6(1) of the National Archives of Canada Act (1987, c. 1), accessed 3 November 2006, available from <http://laws.justice.gc.ca/en/n-2.5/text.html>.

between the archives and agency, which points to the necessity of developing strong working relationships in order to facilitate the conduct of archival appraisal. Effective with the National Archives of Canada Act and pursuant to other legislation enacted around the same time, agencies were tasked with the responsibility for identifying appropriate retention periods for records necessary for their own legal or operational purposes.⁸ This freed the GRDP from conducting archival appraisal as a records scheduling exercise, allowing archivists to focus on the selection of records with historic or archival importance.

At the time of this study, new legislation governing Canada's national archival institution was in the works, as a result of the impending merger between the National Library of Canada and the National Archives of Canada. In 2004, these institutions officially became Library and Archives Canada, placing responsibility for documenting Canada's cultural heritage under a single organization. The Library and Archives Canada Act placed this new institution under the authority of the Librarian and Archivist of Canada. The new legislation made minor modifications in wording to the sections of the legislation that pertain to LAC's statutory responsibilities for disposal and transfer of archival records, but the charge for these activities remains essentially unchanged from the National Archives of Canada. Chapter 12(1) reads: "No government or ministerial record, whether or not it is surplus property, shall be disposed of, including by being destroyed, without the written consent of the Librarian and Archivist or a person to whom the Librarian and Archivist has, in writing, delegated power to give such consents."⁹ The revised legislation clearly specifies that the consent of the Librarian and

⁸ Relevant legislation and policy includes the Policy on the Management of Government Information Holdings (1989); the Access to Information Act (R.S., 1985, c. A-1), accessed 3 November 2006, available from <http://laws.justice.gc.ca/en/A-1/index.html>; and the Privacy Act (R.S., 1985, c. P-21), accessed 3 November 2006, available from <http://laws.justice.gc.ca/en/P-21/index.html>. The first of these has since been superseded by the Policy on the Management of Government Information Holdings (2003).

⁹ See §12(1) of the Library and Archives of Canada Act., (2004, c. 11), 3 November 2006, available from <http://laws.justice.gc.ca/en/L-7.7/index.html>.

Archivist to dispose of records must be written, and provides for the Librarian and Archivist to delegate such consent in writing, a requirement not made explicit in the legislation it supersedes. Chapter 13(1) states that government records that the Librarian and Archivist “considers to have historical or archival value” should be transferred to LAC “in accordance with any agreements for the transfer of records that may be made between the Librarian and Archivist and the government institution or person responsible for records.”¹⁰ This new version wordsmiths the criteria for records to be transferred to LAC from “historic and archival importance” to “historical and archival value” and retains the specification that agreements for the transfer of such records be negotiated between the archives and the agency. Significantly, the reference to “scheduling” is removed, which makes clear that responsibility for setting retention periods for records is not the legal responsibility of LAC. This deletion also reflects clearly that the Government Records Disposition Program at LAC, tasked with making appraisal recommendations to the Librarian and Archivist, is in the business of archival selection, not records scheduling.

LAC’s Primary Contributions to Appraisal Practice

Archivists at the National Archives of Canada have played an active role in the articulation of an appraisal strategy capable of meeting the challenge of effectively appraising modern records.¹¹ Since the early 1990s, numerous articles have been published in the professional literature by archivists from NAC documenting that institution’s development and subsequent implementation of a strategy known as macro-appraisal. Proponents of macro-appraisal have outlined factors which resulted in the need for new methods of archival appraisal.

¹⁰ See §13(1) of the Library and Archives of Canada Act., (2004, c. 11), accessed 3 November 2006, available from <http://laws.justice.gc.ca/en/L-7.7/index.html>.

¹¹ Since the formulation of macro-appraisal strategy took place while the institution was known as the National Archives of Canada (NAC), this section uses that designation.

An examination of traditional appraisal practices in light of the changing documentary universe underscores a number of problems with long-standing methods of selection. Terry Cook, formerly of the National Archives of Canada and instrumental in the development and articulation of macro-appraisal strategy, has offered a comprehensive analysis of the failure of traditional appraisal theory and practices.¹² Cook notes that archivists, long influenced by practices for appraisal developed at the National Archives in the United States, have traditionally appraised records from the bottom up, focusing on particular records. He labels this approach to selection “taxonomic,” meaning that archivists have concentrated their appraisal activities around the effort to identify different types of values – such as evidential, informational, legal, financial, or administrative – in actual records. In doing so, they have based selection decisions on the presumed research value of records. Cook argues that a central flaw in this approach is that “there are altogether too many records ‘at the bottom’ for archivists to appraise.”¹³ Perhaps more significantly, however, this records-centered approach to appraisal, in emphasizing the record itself over its structural and functional context, fails to give adequate attention to records creators and records creating processes.

Other archivists from NAC have stressed additional factors that have rendered traditional appraisal techniques increasingly inadequate for the management of archival records. Catherine Bailey has observed that conventional records appraisal has focused almost exclusively on paper records.¹⁴ As well as rapidly proliferating quantities and formats of electronic records, modern documentation includes a diverse array of media, such as audio-visual materials, photographs,

¹² Terry Cook, “‘Mind Over Matter’: Towards a New Theory of Archival Appraisal,” in *The Archival Imagination: Essays in Honour of Hugh A. Taylor*, ed. Barbara L. Craig (Ottawa: Association of Canadian Archivists, 1992), 38-70.

¹³ *Ibid.*, 42.

¹⁴ Catherine Bailey, “From the Top Down: The Practice of Macro-Appraisal,” *Archivaria* 43 (Spring 1997): 89-129.

maps, and architectural drawings. Therefore, an alternative to this paper-oriented appraisal approach is urgently required to help archivists select a rich and representative documentary record of contemporary society. An important goal of macro-appraisal is to be media neutral; that is, to concentrate appraisal efforts on the identification of the best documentation of a function, regardless of its format.

Richard Brown, also of NAC, has suggested another variable that has limited the applications of conventional appraisal practice. He points out that selection activities have traditionally taken place within a relatively stable, hierarchical environment.¹⁵ Today's organizations, however, are increasingly complex and no longer fit this model. Frequent structural reorganizations have created a constantly evolving environment. Because of this institutional complexity and fluidity, appraisal decisions based on the hierarchical location of records creating offices alone are insufficient to produce a representative archival record; therefore, archivists must seek another framework to supplement structural selection of records.

In response to this changing documentary universe and the difficulties inherent in appraising records within this environment using conventional appraisal strategies, archivists at NAC began to advocate macro-appraisal as a solution to the numerous dilemmas posed by modern documentation. The premise behind macro-appraisal is that careful research, planning, and analysis must precede the targeted examination of actual records. Richard Brown has offered this definition of macro-appraisal:

[T]his is a method of records appraisal and archival selection that establishes an intellectual order of records acquisition priority based on the contextual significance of their sources or sites of creation, i.e., properties and qualities of creator value determined by examining organizational formations (structures), institutional programme activities (functions), and business transactions (processes). In essence, it concentrates the appraisal efforts of the archivist at the

¹⁵ Richard Brown, "Macro-Appraisal Theory and the Context of the Public Records Creator," *Archivaria* 40 (Fall 1995): 121-142.

tier of the records creator, rather than at the information substance of the record...It emphasizes the archival value of a structured model site, functional activity, or institutional process of business transaction, as opposed to the archival value of records; it assigns primacy of importance to the value of evidential context in which records are created, rather than to the value of information that records may contain.¹⁶

More simply put, macro-appraisal is a top-down, research-based approach that attempts to determine where the richest documentation should be located. It is intended to make the appraisal process more objective by selecting for archival retention that documentation which provides the most complete evidence of the records creator's activities.

Macro-appraisal grew out of the European archival tradition which advocates "the need for the archivist to understand how society functions and how it creates records before one appraises the actual records themselves."¹⁷ The goal of the archivist in appraisal is understood to be the selection of a documentary record which provides a representative image of society itself. At NAC, macro-appraisal had its origins in the effort to improve the appraisal and disposition process for departments of the Canadian government. Prior to 1991, when NAC officially adopted the macro-appraisal strategy, the initiative for requesting records disposition authority rested with individual government departments. Catherine Bailey describes the disposition process preceding the implementation of macro-appraisal:

[T]he process was a passive and ad-hoc ("on demand") one over which the NA exercised little control. Federal institutions willing to cooperate in the process prepared records schedules at their own initiative and presented them to the NA for approval, where they were accepted, rejected, or modified before an appraisal was carried out. This process was very time consuming and inefficient... Appraisal of federal records was often carried out "from the bottom up," resulting in the acquisition of many records (possibly of dubious archival value) in a haphazard and piecemeal fashion.¹⁸

¹⁶ Ibid., 127.

¹⁷ Cook, "Mind Over Matter," 48. This thinking is based on Hans Booms, "Society and the Formation of a Documentary Heritage: Issues in the Appraisal of Archival Records," *Archivaria* 24 (Summer 1987): 69-107.

¹⁸ Bailey, "From the Top Down," 96-97.

As part of its initiative to fulfill its legally mandated responsibility to identify records of archival and historical value for transfer to NAC, the institution implemented a Government Wide Plan (GWP) to evaluate and appraise the records of agencies subject to the National Archives of Canada Act.¹⁹ This new arrangement provided a framework within which NAC could work actively with government departments to negotiate transfer archival materials to NAC and to authorize disposition of non-archival records no longer required by the agencies for legal or operational purposes.

The aim of macro-appraisal at NAC is to create an image of society which will represent its most significant features. This image is achieved by integrating function, which Cook equates with the purpose or intent of the records creator, with structure, which represents the actual records creator. In effect, this approach enables an analysis of documentation on both the horizontal (functional) and vertical (structural) levels. Cook points out that records are produced through the interaction of function and structure with clients and argues that, “It is at these points of sharpest *interaction* that the best documentary evidence will be found.”²⁰ As part of the development of the Government Wide Plan, records creators within the government of Canada were ranked on the basis of the significance of their functional-structural interaction with citizens. On the basis of this ranking, NAC was able target its appraisal efforts at the most important offices in order to locate the richest evidence of Canada’s governance function.

In order to achieve the most representative image of society as reflected in the functional-structural interaction of the Canadian government with its citizens, the macro-appraisal strategy utilized by NAC relies on a two-pronged approach. In the first phase, appraisal archivists

¹⁹ See the *Government-Wide Plan for the Disposition of Records, 1991-1996*, accessed 3 November 2006, available from <http://www.collectionscanada.ca/information-management/002/007002-2024-e.html>. The GWP is periodically updated to ensure that it reflects current government functions and structures.

²⁰ Cook, “Mind Over Matter,” 50.

conduct research about records creators and examine their records creating processes in order to gain an understanding of the functions which the agency is legally mandated to perform. Based on the results of this research, the appraising archivist forms a hypothesis about where the richest documentation for these functions is likely to be found. The second phase of macro-appraisal entails testing this hypothesis through a nine-step process which applies traditional micro-appraisal criteria – such as age, quantity, condition, and completeness – to selected groups of records. The application of macro-appraisal techniques as the first part of this process effectively shifts the emphasis of appraisal activities from the records themselves to records creators and records creating processes.

The implementation of a macro-appraisal approach at LAC has completely transformed that institution's appraisal practice over the past fifteen years. While modifications and refinements to the technique continue to be made as the institution gains more experience in applying it, there is agreement among archivists at LAC that supplementing conventional micro-appraisal practice through the addition of macro-appraisal techniques through the front end application of macro-appraisal techniques has made substantial contributions to the selection of higher quality archival materials, in large part because the research entailed in macro-appraisal results in archivists having a better understanding of the context of records creation upon which to base appraisal decisions. A respectable body of literature regarding macro-appraisal as developed and implemented at NAC has been published in the archival literature during the years since the adoption of this approach to appraisal.²¹ In addition, this methodology has influenced

²¹ Writings about macro-appraisal can be classified into three phases based upon the evolution of this strategy within Library and Archives Canada. For what might be considered a "first round" of writings on macro-appraisal at the then National Archives of Canada, see Cook, "Mind over Matter"; Brown, "Macro-Appraisal Theory and Context"; Jean-Stéphan Piché, "Macro-appraisal and Duplication of Information: Federal Real Property Management Records," *Archivaria* 39 (Spring 1995): 39-50; Sheila Powell, "Archival Reappraisal: The Immigration Case Files," *Archivaria* 33 (Winter 1991-1992): 104-116; and Bruce Wilson, "Systematic Appraisal of the Records of the Government of Canada at the National Archives of Canada," *Archivaria* 38 (Fall 1994): 218-231. For the

the National Archives of South Africa and Australia; the state of Alabama; pilot projects at the National Archives and Records Administration and the Public Records Office; and the provinces of Ontario and Manitoba.²²

Accounting for Appraisal at LAC

The researcher traveled to Library and Archives Canada in Ottawa in September, 2003. Prior to the site visit, she had been provided with documentation for ten appraisals. She had also been able to examine full documentation of LAC's methodology for conducting appraisal, which is publicly available on the institution's website.²³ For the duration of the research trip, the Government Archives Division at LAC afforded her access to comprehensive appraisal documentation available through the Records Disposition Authority Control System (RDACS), a database developed internally at LAC in the late 1990s which contains records disposition authorities and associated documentation dating back to 1936.

second phase of macro-appraisal articles, see Bailey, "From the Top Down: The Practice of Macro-Appraisal," *Archivaria* 43 (Spring 1997): 89-129; Brian P. N. Beaven, "Macro-Appraisal: From Theory to Practice," *Archivaria* 48 (Fall 1999): 154-198; and Richard Brown, "Back to the Strategic Roots: Appraisal Reform at the National Archives of Canada," *Archival Issues* 24:2 (1999): 113-122. The most recent articles about macro-appraisal at LAC include: Kerry Badgley and Claude Meunier, "Macroappraisal, the Next Frontier: An Approach for Appraising Large and Complex Government Institutions," *Archival Science* 5 (December 2005): 261-283; Catherine Bailey, "Turning Macro-appraisal Decisions into Archival Holdings: Crafting Function-based Terms and Conditions for the Transfer of Archival Records," *Archivaria* 61 (Spring 2006): 147-179; Brian P. N. Beaven, "'But Am I Getting My Records?': Squaring the Circle with *Terms and Conditions* Expressed in Relation to Function and Activity," *Archival Science* 5 (December 2005): 315-341; Margaret Dixon, "Beyond Sampling: Returning to Macroappraisal for the Selection of Case Files," *Archival Science* 5 (December 2005): 285-313; Normand Fortier, "Transparency, Compliance, and Accountability: Developing A Knowledge Infrastructure for Macroappraisal at Library and Archives Canada," *Archival Science* 5 (December 2005): 343-360; and, Candace Loewen, "Accounting for Macroappraisal at Library and Archives Canada: From Disposition to Acquisition and Accessibility," *Archival Science* 5 (December 2005): 239-259.

²² Based on an E-mail message from Terry Cook, 7 July 1998. See also John Roberts, "One Size Fits All? The Portability of Macro-Appraisal by a Comparative Analysis of Canada, South Africa, and New Zealand," *Archivaria* 52 (Fall 2001): 47-68; John Roberts, "Macroappraisal Kiwi Style: Reflections on the Impact and Future of Macroappraisal in New Zealand," *Archival Science* 5 (December 2005): 185-210; and Adrian Cunningham and Robin Oswald, "Some Functions Are More Equal than Others: The Development of a Macroappraisal Strategy for the National Archives of Australia," *Archival Science* 5 (December 2005): 163-184.

²³ This documentation is available at the Government Records Appraisal and Disposition Program's website, <http://www.collectionscanada.ca/information-management/002/007002-2024-e.html>, accessed 3 November 2006). Key pieces of appraisal documentation will be discussed in this section of the dissertation.

During the site visit to LAC, the researcher interviewed twelve archivists with responsibility for various aspects of archival appraisal. One interviewee was primarily responsible for developing and managing the implementation of appraisal policy, two served in a supervisory capacity, and the remaining nine were categorized as appraisal archivists. Interviewees were assured that they would not be identified by name or title in the study report, in order to encourage them to provide frank responses to questions. Thus, the account that follows refers to the archivists who were interviewed as respondents LAC-1 through LAC-12. Data from the interviews provide an account of appraisal documentation resulting from appraisal as it had been conducted at LAC from 1991 through September, 2003. The responses also point to differences between then current appraisal documentation and documentation of that activity prior to the 1990s. Most significantly, however, a theme running throughout the interviews dealt with initiatives underway that would alter some aspects of the appraisal business process at LAC (though not the underlying macro-appraisal theory and methodology), and which would in turn impact the resulting appraisal documentation.

Program-level Documentation

Library and Archives Canada's macro-appraisal approach was officially adopted by the institution in 1991. Inherent in macro-appraisal thought is the requirement for archivists to justify appraisal decisions through an intensive research process into the functions and structures of government agencies and their impact on the lives of Canadian citizens, for the purpose of locating the best documentation of governance. This philosophy has resulted in rich documentation of LAC's appraisal activities at a broad program level and at the level of specific appraisal decisions.

Documents available through the institution's website provide the appraisal framework within which the Government Records Disposition Program (GRDP) at LAC operates. "Preserving the Archival and Historical Memory of Government" outlines LAC's legal authority and responsibility for the appraisal function.²⁴ In accepting responsibility for making appraisal decisions, LAC recognizes that it must be accountable for these decisions: "The National Archives of Canada is responsible for preserving the Government of Canada's archival and historical memory, and consequently, it bears an obligation to explain to Canadians – and to others who may wish to use its archival holdings – how and why decisions are made regarding the archival preservation of government records."²⁵ The report notes that the institution creates and maintains comprehensive documentation of appraisal decision-making, and that this information is available to the public upon request. This document provides a clear explanation of the appraisal process and LAC's objectives in selecting records with historical and archival value. It stresses that while not all records produced by government are maintained, the appraisal process provides a mechanism to identify records of national significance and results in records disposition authorities which provide agencies legal permission to dispose of their non-archival records. This document focuses on LAC's mandated accountability in appraisal, which is to select for transfer to the archives records of historic and archival value. Government agencies, in accordance with the Treasury Board's *Policy on the Management of Government Information* (2003), are responsible for ensuring their own legal and operational recordkeeping requirements.²⁶ LAC is available to provide advice to agency information management staff in

²⁴ See National Archives of Canada, Government Records Branch, "Preserving the Archival and Historical Memory of Government," (Approved by the National Archivist of Canada, 17 October 2001), accessed 3 November 2006, available from <http://www.collectionscanada.ca/information-management/007/007007-1042-e.html>.

²⁵ *Ibid.*, 4.

²⁶ Prior to May 1, 2003, when the current policy was officially adopted, the responsibility of government agencies for recordkeeping requirements was codified in the Treasury Board's *Policy on the Management of Government Information Holdings* (1989).

this process, but the accountability for maintaining records needed for their own legal and operational purposes is assigned by legislation to each government agency.²⁷

The concise program rationale provided in “Preserving the Archival and Historical Memory of Government” is supplemented by two documents that provide a detailed account of LAC’s macro-appraisal strategy and methodology. The first of these, “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part A: Concepts and Theory,” provides an intellectual framework for macro-appraisal.²⁸ The objective of this document “is to encourage greater intellectual consistency in records disposition decision-making and in the logic of its explanation and presentation in *Appraisal Reports*.”²⁹ This tool provides a reflection of current best thinking and practice with regard to appraisal at Library and Archives Canada, but is intended to be flexible and to evolve based on institutional experience. Like “Preserving the Archival and Historical Memory of Government,” the concepts and theory portion of LAC’s macro-appraisal methodology emphasize the need for accountability in disposition decision-making. This document is complemented by “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part B: Guidelines for Performing an Archival Appraisal of Government Records.”³⁰ The purpose of these guidelines is “to provide the elements of an appropriate appraisal research agenda and the basic methodological steps which can be utilized to make records disposition decisions within the NA context of macro-appraisal.”³¹ This report

²⁷ “Preserving the Archival and Historical Memory of Government,” 4-5.

²⁸ National Archives of Canada, Government Records Branch, “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part A: Concepts and Theory,” (Approved by the National Archivist of Canada, 17 October 2001), accessed 3 November 2006, available from <http://www.collectionscanada.ca/information-management/007/007007-1035-e.html>.

²⁹ *Ibid.*, 2.

³⁰ National Archives of Canada, Government Records Branch, “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part B, “Guidelines for Conducting an Archival Appraisal of Government Records,” (Approved by the National Archivist of Canada, 17 October 2001), accessed 3 November 2006, available from <http://www.collectionscanada.ca/information-management/007/007007-1041-e.html>.

³¹ *Ibid.*, 2.

highlights the responsibility archivists have to make the appraisal process open and transparent and indicates that the appraisal report utilized to justify selection and disposition decisions is “designed to both reflect this business process and to serve as an accountability and audit trail in the same transparent way that other business processes of government are conducted.”³² Taken together, these three program level documents available through LAC’s website comprise not only a sound framework for the institution’s appraisal process, but provide a window through which government agencies and the public can understand how and why archivists conduct this function.

Initiating the Appraisal Process

At the time this research was conducted in September, 2003, the business process for the appraisal function, though not the underlying macro-appraisal theory and methodology, was in transition. Modifications to this business procedure were expected to impact the documentation associated with the appraisal process, although these changes had not yet taken effect. As a result, this account of the macro-appraisal process at LAC and the documentation resulting from it includes discussion of both then current and emerging practices. One of the goals behind the proposed alteration to the appraisal business process at LAC was a desire to transform appraisal from an agency-driven process to an archives-driven process, an effort initiated in 1991 with the adoption of macro-appraisal, in order to better enable LAC to meet its mandated accountability to identify records of archival and historical significance for transfer to the archives.

The National Archivist of Canada was tasked in the National Archives of Canada Act (the legal authority at the time this research was conducted) with selecting records of historical and national significance for transfer to LAC and with providing agencies authorization to dispose of non-archival records. This legislation did not, however, provide the National

³² Ibid., 3.

Archivist with the authority to require agencies to initiate the process. Thus, LAC relied on building successful relationships with government agencies in order to demonstrate the value to departments of requesting authorization for records disposition, which in turn put the archivists at LAC in a position to conduct archival appraisals in order to identify records of national significance which should be transferred to the archives.

Prior to the adoption of macro-appraisal in 1991, NAC had a passive approach to appraisal, waiting for agencies to initiate the appraisal process by requesting records disposition authorities. With the advent of the institution's new appraisal strategy, NAC signaled its intention to become more proactive in working with agencies to identify records of archival value. The means by which NAC did this was to develop, based on a macro-appraisal analysis of the functions and structure of Canadian government, a Government-Wide Plan (GWP) for the disposition of records.³³ In this plan, NAC assigned a category (ranging from one to four) to each government agency, determining the priority to the Government Records Disposition Program for appraising the records of the agency. Category one organizations were hypothesized to produce the most significant evidence documenting the governance function in Canada; therefore, archival appraisals were most pressing for these agencies. At the other end of the spectrum, category four agencies were considered to create records of the least importance for archival purposes; thus, archival appraisals were a less urgent matter for these organizations. On the basis of the priorities established in the GWP, the archives began to approach agencies classified in category one to negotiate Multi-Year Disposition Plans (MYDP) to establish schedules for the agencies to produce records disposition submissions to NAC, with the goal of providing these agencies with comprehensive records disposition authorities for their records.

³³ See the *Government-Wide Plan for the Disposition of Records, 1991-1996*, accessed 3 November 2006, available from <http://www.collectionscanada.ca/information-management/002/007002-2024-e.html>. The GWP is periodically updated to ensure that it reflects current government functions and structures.

While a great deal of progress was made by the Government Records Disposition Program in conducting archival appraisals through using the GWP in conjunction with MYDPs, by 2003 LAC had concluded that it was time for the institution to adopt a still more proactive approach to appraisal. The change envisioned at the time of this study, which has since been implemented, is one that can be described as a “philosophy shift” in LAC’s records disposal program.³⁴ Rather than negotiating a Multi-Year Disposition Plan with an agency, what LAC now does is develop a Memorandum of Understanding (MOU) with an agency. The MOU authorizes LAC to go into a government department to conduct an archival appraisal. A central aspect of the shift from MYDPs to MOUs was the elimination of the requirement for government agencies to produce a Records Disposition Submission to LAC in order to initiate the appraisal process. Rather, responsibility for gathering the information needed to conduct an archival appraisal has shifted to archivists at LAC. The archivist or archivists tasked with carrying out the appraisal then produce a Research Document containing the contextual information about the agency, its mandates, functions, structure, and interaction with Canadian citizens that is essential to form an appraisal hypothesis. This working document is then used to produce the Archival Appraisal Report that would become a part of the official documentation of the disposition decision.³⁵

This alteration in the appraisal business process was envisioned as a means by which LAC could assume more active responsibility for its legal accountability to select records with archival and historical value for transfer to the nation’s archival repository. One archivist described the change being proposed by the Government Records Disposition Program as follows: “We are not going to wait for departments to resolve their own accountability issues and

³⁴ Respondent LAC-1, interview by author, September 8, 2003.

³⁵ For a description of current practices for documenting appraisal at LAC following this shift, see Loewen, “Accounting for Macroappraisal at LAC.”

how they organize their information and what they need to do. We're going to do what we need to do to satisfy our legislative requirements and our mandate. Do whatever we can to make that transparent and clear to the department in terms of implementation."³⁶ This shift will still entail collaboration between LAC and government agencies, as the now current legislation charging the Librarian and Archivist of Canada with selecting records of historical and archival value for transfer to the archives and with granting agencies authority to dispose of non-archival records, like the National Archives of Canada Act which it replaced in 2004, calls for transfer of records to take place as a result of negotiated agreements between LAC and the agencies.³⁷

Archivists in the Government Records Disposition Program believed that they would be able to offer agencies powerful incentives to secure their buy-in to this new appraisal process, which would shift the burden of conducting the groundwork for the appraisal and disposition function from agencies to the archives. Under the submission-triggered process utilized prior to 2003, information management staff within government agencies were responsible for preparing the document that would be used as a preliminary appraisal tool by LAC. Since the implementation of macro-appraisal, agencies had been encouraged to submit comprehensive requests for records disposition, covering the records of the entire agency, or in the case of very large agencies, covering particular programs with specific functional responsibilities. Gathering information describing the organization's functional responsibilities and its recordkeeping context represented a research-intensive and time-consuming exercise (in some cases lasting for three or four years as agencies grappled with internal information management problems discovered in the course of preparing submissions) for agency personnel, for whom submitting

³⁶ Respondent LAC-1, interview by author, September 8, 2003.

³⁷ See §13(1) of the Library and Archives of Canada Act., (2004, c. 11), accessed 3 November 2006, available from <http://laws.justice.gc.ca/en/L-7.7/index.html>.

this document to LAC was not necessarily a priority. Under this system, it was difficult for LAC to anticipate the rate at which submissions would be received and to plan for the work of archival appraisal. LAC also exerted no control over the quality of the submissions received from the agencies, which varied widely. Noted one archivist, “There was always the concern that we were not getting a full picture, that we were getting a blueprint, but then we had to as part of the appraisal process flesh that out and provide a full picture of the environment in which those records were created.”³⁸ Another observed that under the submission-driven system, there was a duplication of effort on the part of agency information management personnel and the appraisal archivist, both of whom engaged in similar sorts of research in order to describe the functions to be appraised.³⁹ Thus, a shift to a system in which the archivist would do the upfront research critical to appraisal would not only alleviate the burden entailed in this process for the agency, but would help to streamline the appraisal business process within the government as a whole.

It may be the outcome of the appraisal exercise, however, that proves to be LAC’s best selling point to government agencies. Agency personnel would continue to play an integral role in the disposition decisions reached by LAC through serving as sources of information for appraisal archivists about the organization’s functions and recordkeeping environment. Thus, agencies will have to devote time and resources to this process, so goodwill between LAC and agencies remains essential. The payoff for the agency, however, is that by signing a Memorandum of Understanding with LAC and facilitating the appraisal process, it can secure a Records Disposal Authority that would apply to all of its records, including those resulting from the agency’s future conduct of business. The outcome of the appraisal would be a one-time agreement that would permit the agency to fulfill its business responsibilities for disposing of

³⁸ Respondent LAC-8, interview by author, September 11, 2003.

³⁹ Respondent LAC-7, interview by author, September 10, 2003.

records no longer needed for legal and operational purposes and for transferring archival records to LAC more efficiently, without needing to seek subsequent authorization for disposal authority from LAC.⁴⁰

Summarized one interviewee, “What we’re trying to do philosophically is change the name of the game from a program that’s built on providing authority for government to manage its information with the corollary that we get to acquire archival records to a program that deliberately goes out to identify and acquire archival records.”⁴¹ Having selected records of national significance, LAC can then give the agency authority to dispose of the remainder of its records once they are no longer required for legal or operational purposes, as part of one package.⁴² Other units within LAC are available to help agencies determine their legal and operational requirements for recordkeeping, but this is not the purview of the Government Records Disposition Program. Under the Management of Government Information Policy (2003), agencies are responsible for determining appropriate retention periods for their records. This division of responsibility for recordkeeping requirements between the archives and the agency allows LAC to focus on the selection of records of archival and historic value, in accordance with its legislative mandate. Thus, “Macro-appraisal is not a records scheduling exercise. It’s an archival exercise.”⁴³

⁴⁰ Future records disposition authorities would only need to be sought if the agency’s functions changed.

⁴¹ Respondent LAC-1, interview by author, September 8, 2003.

⁴² Respondent LAC-4, interview by author, September 9, 2003.

⁴³ Respondent LAC-1, interview by author, September 8, 2003.

*Documentation of Appraisal Decisions*⁴⁴

At the time this study was conducted, the official documentation for a disposition decision consisted of an Archival Appraisal Report and a Records Disposition Authority, with an associated Agreement for Transfer between the agency and the archives and a Terms and Conditions document which identifies archival records to be transferred to LAC. LAC considers these documents to constitute the archival record of the appraisal function, and all of them are available through the Records Disposition and Authority Control System (RDACS), a database which LAC developed in the late 1990s in order to facilitate and document its appraisal function.⁴⁵ RDAs and the Agreements and Terms and Conditions attached to them are issued in Canada's two official languages, French and English. Appraisal reports, which are not part of the official disposition documentation package, are written in English, French, or a combination of the two, depending on the preference of the archivist writing the report. An executive summary of the Archival Appraisal Report, which also becomes part of the RDACS record, is forwarded for approval to the Librarian and Archivist, along with the RDA, the Agreement for Transfer, and the Terms and Conditions.

Appraisal at LAC is research-intensive process, in which archivists in the Government Records Disposition Program, guided by the "Concepts and Theory" of Part A of the macro-

⁴⁴ This section discusses the appraisal documentation produced by LAC in the course of granting Institution Specific Appraisal Authorities (ISDAs), RDAs issued to grant specific institutions permission to dispose of records according to the terms and conditions associated with the authority. It does not consider the documentation associated with the creation of Multi-Institutional Disposition Authorities (MIDAS), which grant either all or more than one agency permission to dispose of common and administrative records when they are no longer required for the agencies' legal or operational purposes. The MIDAs issued by LAC to cover these common and administrative records, and their supporting documentation, are accessible from <http://www.collectionscanada.ca/information-management/007/007007-1008-e.html>, accessed 3 November 2006.

⁴⁵ In appraising its operational records, LAC determined that Records Disposition Submissions from agencies were non-archival; thus, they do not become part of RDACS. It had not yet been determined if Memorandums of Understanding would be entered into the system. Another impending change was the development of Application Guidelines, which would assist agencies in the process of implementing the Terms and Conditions negotiated as part of the Agreement for Transfer. This new tool, and the work of the task force charged with drafting it, is described in detail in two recent articles. See Bailey, "Turning Macro-appraisal Decisions into Archival Holdings" and Beaven, "But Am I Getting My Records?"

appraisal and functional analysis model and according to the “Guidelines for Performing an Archival Appraisal of Government Records” articulated in Part B, form and justify appraisal hypotheses regarding the archival value of records produced by government agencies. Appraisal archivists investigate the mandates, functions, and structures of the agency for which records are being appraised, and consider the impact of these functions on the lives of Canadian citizens. The goal of the appraisal exercise is to determine which units produce evidence of the agency’s most significant functions and to determine if these units are the Offices of Primary Interest (OPIs) or Offices of Collateral Interest (OCIs) within Canadian government for that function. Part A of the macro-appraisal and functional analysis model defines the OPI as “the administrative entity within government which is *exclusively* responsible and/or accountable for formulating policy, making decisions, or delivering a program or service to Canadians by virtue of law, regulation or mandate, and is the location for the best archival record.”⁴⁶ An OCI is a unit which creates records which must be acquired in conjunction with those produced by the OPI for that function, in order to ensure that LAC acquires sufficient documentation of said function. Macro-appraisal theory states that the best documentation of government functions should be located in Offices of Primary Interest (OPIs), and that LAC should acquire documentation mainly from these centers of responsibility, supplemented by records from OCIs when additional documentation is required to adequately document a function. Thus, an important variable in conducting research of an agency and its recordkeeping environment is to identify whether any of its units are OPIs or OCIs for its legislatively mandated functions. In most cases, the records of a function produced by an OPI will provide sufficient documentation

⁴⁶ See National Archives of Canada, Government Records Branch, “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part A: Concepts and Theory,” (Approved by the National Archivist of Canada, 17 October 2001), accessed 3 November 3, 2006, available from <http://www.collectionscanada.ca/information-management/007/007007-1035-e.html>.

of that function, but the archivist must also take care to determine whether records of OCIs might be required to shed adequate light on key agency functions. In the course of conducting this background research essential to appraisal, archivists gather a wealth of information relevant to agency functions, structures, mandates, and recordkeeping environment, based on interviews with agency personnel, primary documents, and secondary literature. This information is compiled into a working file, from which appraisal archivists cull the information to produce archival appraisal reports, which are works of scholarship in their own right.

The Archival Appraisal Report is the core component which documents the appraisal decision making process at LAC. These documents follow a standard format, which corresponds to the process of macro-appraisal and functional analysis that archivists engage in when forming their appraisal hypothesis. Archival appraisal reports are produced in accordance with the guidance provided to appraisal archivists in the internal document, “Drafting an Appraisal Report for the Disposition of Government Records.”⁴⁷ The appraisal report consists of four essential components: an introductory section, the archival appraisal itself, the identification of records of archival value, and a signatures section. At the time of this study, the first section provided information relevant to the context of the submission, including a description of the authority the agency had requested, a record of which agency personnel had prepared the submission, and LAC staff from outside the Government Records Disposition Program who assisted in the preparation of the submission. This aspect of the introductory section of an archival appraisal report will presumably be modified as the appraisal business process at LAC changes. Rather than information from the Records Disposition Submission, this component might contain information drawn from the Research Document prepared by the archivist.

⁴⁷ This document was provided to the researcher for reference. National Archives of Canada, Government Records Branch, “Drafting an Appraisal Report for the Disposition of Government Records,” February 2001.

Additional elements of the initial section of the appraisal report included the identification of the archivist or archivists at LAC who conducted the appraisal, a summary of related disposition authorities that might exist, and a description of the recordkeeping environment within the agency.

The second section, the archival appraisal itself, is the heart of this document. The appraisal archivist presents his or her thesis, and then supports this hypothesis by providing the macro-appraisal context and functional analysis from which this assessment emerged. The archivist focuses on articulating the responsibilities of the agency based on its legislative mandate, identifying the most significant functions which the agency fulfills, and on identifying OPIs and OCIs. With this groundwork laid, the archivist proceeds to describe how he or she verified the appraisal hypothesis. This justification might include descriptions of interviews with agency staff, references to primary information sources and secondary literature, and a summary of the micro-appraisal exercise performed on a spot-check basis to validate the thesis. The archivists who were interviewed as part of this dissertation research indicated that in most instances, the initial hypothesis holds up, but that there are cases when it is disproved and the archivist must reformulate the original hypothesis and proceed from there to validate a new appraisal thesis. Situations in which the appraisal archivist reverses the initial appraisal judgment can be especially challenging to document because of “the need to justify the reversal and come down with good reasons and identify what [the] hesitation was.”⁴⁸

The third section of the Archival Appraisal Report (Records of Archival Value) contains appraisal recommendations. In it, the archivist identifies the functions which produce records that should be transferred to LAC because of their historical and archival value, as well as those records which are not appropriate for transfer to the archives and which the agency should be

⁴⁸ Respondent LAC-6, interview by author, September 10, 2003.

granted authority to dispose of when they are no longer required for legal or operational purposes. Functions are mapped to the programs which produce the best records providing evidence of the agency's mandated activities and services. This portion of the appraisal report points to the difficulties appraisal archivists may face in making selection decisions based on function for agencies that are still using subject-based classification files. Some of the older appraisal reports examined as part of this research listed specific file series, along with the description of the functions, activities, programs, and services for which each appraisal recommendation was being made. The more recent reports, written when archivists had gained more experience in the application of function-based macro-appraisal and had guidelines for drafting appraisal reports, do not tend to list particular series of records to be transferred. Appraisal recommendations are also broken down by type of media (e.g., electronic records of archival value, audio-visual records of archival value). Macro-appraisal is intended to be media-neutral, seeking the richest documentation of a function, regardless of format. This separate discussion of special media records in appraisal reports could reflect the challenges of applying a macro-appraisal strategy to non-textual records. It also might reflect the business practice at LAC that appraisal archivists often consult with their colleagues who have expertise working with records in particular media during appraisals and could be drawing on recommendations made by a second party in their appraisal report. Another alternative is that in writing appraisal reports, archivists are anticipating the implications of acquisition of special media records, which will be managed by separate units within LAC and which have their own informational requirements. Thus, breaking out appraisal recommendations by media could be a meant to reflect that the appraisal assessment had considered the feasibility of acquisition.

The final portion of a typical appraisal report is a signature section, which reflects the chain of command that has reviewed the document. Appraisal reports are approved by at least three staff members before an executive summary of the selection recommendations is produced and forwarded to the Librarian and Archivist. The appraisal archivist, as well as the chief of the appraisal section in which the appraisal archivist works, signs the appraisal report, along with a senior representative of the Government Records Branch. Several documents examined as part of this research contained four signatures, but the minimum requirement appears to be three. In addition to the four standard portions of the archival appraisal report, some contain additional sections with information relating to a unique aspect of the appraisal, or appendices supporting the research that was conducted in performing the archival appraisal that support appraisal recommendations made in the body of the report.

In the few years preceding this study, LAC had embarked on an active initiative to limit archival appraisal reports to twenty pages.⁴⁹ Since the adoption of macro-appraisal at NAC, the research-intensive nature of the process had resulted in copious appraisal documentation. Appraisal reports would run to forty, sixty, eighty, even in excess of a hundred pages, creating a burden of excessive documentation, which slowed and at times paralyzed work within the Government Records Disposition Program. The quality of the appraisals being conducted was excellent, but the pace of work did not produce the authorities that agencies needed to dispose of records at a satisfactory rate. Several of the archivists interviewed offered the opinion that this shift to perhaps excessive documentation was an over-correction, since they recognized that prior to the 1990s, scarcely any appraisal documentation had been produced at all.⁵⁰ In refining and standardizing its appraisal reports, the GRDP is attempting to determine what amount of

⁴⁹ The average number of pages for the ten appraisal reports examined for this research was 17.44.

⁵⁰ Respondent LAC-1, interview by author, September 8, 2003; Respondent LAC-2, interview by author, September 8, 2003; and Respondent LAC-6, interview by author, September 10, 2003.

documentation the Librarian and Archivist needs to see in order to be comfortable signing Records Disposal Authorities. This shift is also geared towards eliminating redundancy in appraisal documentation and toward meeting the preferences of senior managers who review appraisal reports before an executive summary is forwarded to the Librarian and Archivist. Some archivists continue to grapple with condensing appraisal reports into twenty pages, which can present a challenge given the complexity of the macro-appraisal process, but they recognize that the managerial imperative to streamline these documents must be met.

Appraisal archivists put a great deal of effort into producing quality archival appraisal reports. They do so because they view this document a means of justifying appraisal recommendations (and therefore being accountable for these decisions), because appraisal reports become valuable tools for the archivists themselves, and because these documents have potential utility for agencies and the public as well. One archivist described the importance of appraisal decisions, which have implications and must therefore be supported in the appraisal report, noting that if the decision is, “‘No, get rid of it,’ you have to live with that. If you say, ‘Yes, let’s keep it,’ it costs money. It costs the taxpayer money, it costs time and effort to take care of those records.” This interviewee further noted, “We have to justify hard decisions, since you can probably argue any of the decisions that we’ve made. You can argue the other side probably quite well and say that we were wrong.”⁵¹

Archivists at LAC recognize the utility of archival appraisal reports as internal tools which facilitate the appraisal business process. Through accessing the Records Disposition and Control System (RDACS), a database designed by LAC to provide a comprehensive, longitudinal view of records disposition and appraisal back to 1936, archivists conducting

⁵¹ Respondent LAC-6, interview by author, September 10, 2003.

appraisal have a wealth of information to assist them with current disposition decisions.⁵² They are able to research prior and related appraisal reports that might impact current disposition decisions by shedding light on some aspect of the appraisal they are currently conducting. As they formulate and provide the rationale for selection decisions, appraisal archivists often use RDACS to consult these reports. Archival appraisal reports are considered to be “invaluable tools,” especially for new archivists or for those who are conducting macro-appraisal for the first time.⁵³ One interviewee notes, “It’s a document you use. I go back to the appraisals frequently and think, “Why did we decide that? Oh, it’s right here. Did we address that? Yes, we did. It’s right here. So the appraisal report itself...is a very useful tool because it really addresses... the decision-making process.”⁵⁴ In part because they rely so heavily on previous appraisal reports, archivists at LAC feel an accountability to their successors to ensure that their own archival appraisal reports reflect a sound rationale to support the selection recommendations which they make. Notes one appraisal archivist, “So much of our appraisal documentation has to be for archivists who come after us who will build on decisions that were made and need to know what we were thinking.”⁵⁵

The Archival Appraisal Report is the key piece of documentation produced at LAC to serve as a record of the decision-making process for the institution’s appraisal mandate, but it is not a legal instrument. The legal document in which the Librarian and Archivist of Canada grants agencies authority to dispose of non-archival records when they are no longer needed for legal or operational requirements and tasks them with the transfer of records of historical and archival value to LAC is the Records Disposition Authority (RDA). Associated with each RDA

⁵² For an account of the development of RDACS, see Fortier, “Transparency, Compliance, and Accountability.”

⁵³ Respondent LAC-7, interview by author, September 10, 2003.

⁵⁴ Respondent LAC-6, interview by author, September 10, 2003.

⁵⁵ Respondent LAC-7, interview by author, September 10, 2003.

are two other documents, which complete the legal framework that authorizes records transfer and disposition activities: the Agreement for the Transfer of Archival Records and the Terms and Conditions for the Transfer of Archival Records. As the official record for the disposition function, these three pieces of documentation are generated in English and French. They use standardized formats and language.

The RDA establishes the statutory authority of the National Archivist of Canada to grant permission for the destruction of government records and to provide for the transfer of records of “historic and archival significance” to LAC.⁵⁶ This instrument authorizes the agency to dispose of the records created by the function or functions described in the RDA when they “have no remaining operational or legal requirements.” It is important to note that agencies are not mandated to destroy records that are no longer needed; the RDA merely conveys the permission to do so. Decisions regarding the implementation of permissions for records destruction established in RDAs rest with the deputy head of a government agency. RDAs can only be signed by the National Archivist of Canada. RDAs emphasize the selection responsibility of the archives by focusing on the materials that have been identified for transfer to the institution due to their “historical and archival significance.” Records that have been appraised as non-archival are only mentioned in the reference that authorizes the agency to dispose of records no longer necessary for operational or legal requirements. The RDA charges the agency with transferring records appraised as having “historic and archival value” in accordance with the Agreement for Transfer associated with the authority and the records described in the appendix to the Agreement (i.e., Terms and Conditions for the Transfer of Archival Records).

⁵⁶ The RDAs which were examined for this study were issued before the enactment of Library and Archives Canada Act in 2004. The Librarian and Archivist of Canada now has this authority, which would be reflected in more recent RDAs. The wording pertaining to the transfer of records to LAC has been revised to refer to records of “historical and archival value.”

The Agreement for Transfer of Archival Records specifies that, in accordance with the legislation which authorizes the Librarian and Archivist to identify records of national significance which should become part of LAC's holdings, the agency must transfer to the archives the records designated in the Appendix, "Terms and Conditions for the Transfer of Archival Records," in accordance with the provisions laid out in that document. LAC accepts responsibility for administering access to transferred records in accordance with relevant legislation and policy (e.g., the Access to Information Act, the Privacy Act, and the Treasury Board Security Policy). It further states that these records will be managed subject to LAC's policies and procedures governing access to government records. The Agreement for Transfer is signed by senior officials of both the agency and LAC.

The final legal instrument in appraisal documentation is the Terms and Conditions for the Transfer of Archival Records. This document lists the responsibilities of the agency prior to transferring records to a federal records center or to the archives. These include requirements to separate archival from non-archival records and to create a list of the records, to be provided to LAC in electronic form. The document notes that LAC will not dispose of any transferred records without prior consent from the agency. It also specifies that the authority to which these terms and conditions are attached was granted on the basis of the organizational context at the time the appraisal was conducted, and tasks the agency with notifying LAC of organizational restructuring that might impact the status of Offices of Primary Interest. Importantly, this document specifies that retention periods must be established by the agency in order to determine when they are no longer required for operational and legal purposes and must be transferred to LAC. Agencies are given a specified amount of time from the date on which the Agreement for the Transfer of Archival Records is signed to provide LAC with these retention periods (e.g., one

year or two years). The Terms and Conditions document may also identify legislation that will govern access to the transferred records. The remainder of this document provides a listing of functional areas for which records have been identified as archival, broken out by media. This is the portion of the document that specifies for the agency which records must be transferred to LAC.

A challenge to which Library and Archives Canada was responding at the time this research was conducted was how to provide agencies with clearer guidance about how to effectively implement the Terms and Conditions document. There was a sense within LAC that a disconnect existed between the functional language, derived from the manner in which macro-appraisal is conducted and used in the Terms and Conditions document to identify an agency's archival records, and the subject-based classification schemes in use by many agencies. Thus, there was considerable concern about whether records management personnel in agencies were able to reconcile these differences in order to ensure that records identified as archival in the Terms and Conditions document would in fact be transferred to LAC. One interviewee noted, "You're always a little worried, I think, from an archival perspective, that matters are sufficiently clear for non-archival managers...who try to interpret what archivists have described as archival in terms and conditions."⁵⁷ In order to address this issue, LAC had established the Terms and Conditions Working Group, charged with developing Application Guidelines which agencies would use as a tool to help them map the functional Terms and Conditions document to their classification schemes in order to correctly identify archival records to be transferred to LAC. These Application Guidelines have now been drafted; while they do not constitute part of the

⁵⁷ Respondent LAC-5, interview by author, September 9, 2003.

legal framework of appraisal documentation, they represent an important component that serves to demonstrate how LAC fulfills its accountability for archival appraisal.⁵⁸

Accountability in Appraisal

Providing for accountability in archival appraisal constitutes an integral part of LAC's approach to its appraisal responsibility. The Librarian and Archivist of Canada has forcefully expressed the institution's obligation to account for appraisal, stating that "there must be a business process susceptible to scrutiny and audit which explains how government makes decisions about the status of records and why it assigns value to certain records and not to others, and why certain records are retained and others are destroyed; there must be a rational records evaluation process which lends context, continuity, and support to the destruction or preservation of public records."⁵⁹ Documentation of the appraisal process and disposition decisions is essential to meeting accountability requirements. This is evident in the comprehensive appraisal framework established to guide appraisal activities at LAC, as well as in the thorough appraisal reports that document individual appraisals.

To pinpoint their accountability for appraisal precisely, archivists at LAC turn to the legislation which pertains to the institution's responsibilities relevant to government and ministerial records. The Library and Archives of Canada Act tasks the Librarian and Archivist of Canada with ensuring the transfer to the archives of government and ministerial records that have "historical or archival value."⁶⁰ In considering the institution's responsibility for appraisal,

⁵⁸ See Bailey, "Turning Macro-Appraisal Decisions into Archival Holdings" and Beaven, "'But Am I Getting My Records?'" for thorough discussions of the Application Guidelines and the process by which they were drafted.

⁵⁹ Wilson, "Fine Art," 133.

⁶⁰ See §13(1) of the Library and Archives of Canada Act, (2004, c. 11), accessed 3 November 2006, available from <http://laws.justice.gc.ca/en/L-7.7/index.html>. This wording remains consistent with the National Archives of Canada Act, which was in effect at the time of this study. See §6(1) of the National Archives of Canada Act (1987, c. 1), accessed 3 November 2006, available from <http://laws.justice.gc.ca/en/n-2.5/text.html>. The

Respondent LAC-1 notes, “It is clear under the legislation that it’s a heritage and cultural accountability. It’s not a business accountability.”⁶¹ This viewpoint was echoed by Respondents LAC-2 and LAC-7.⁶² By law, government agencies are required to identify their recordkeeping requirements for legal and operational purposes.⁶³ This division of responsibilities under Canadian legislation frees archivists to focus on the selection of records that possess national significance – or historical or archival value – for transfer to LAC.

The organization’s emphasis on demonstrating accountability for appraisal through documentation of selection decisions has its origins in the mid-1980s, when an appraisal decision by the then Public Archives of Canada drew criticism, resulting in a government inquiry into the possible improper disposal of government records. The Deschênes Commission was investigated allegations of improper records destruction by the Public Archives of Canada which critics charged might have shed light on an investigation by the Canadian government of possible illegal entry of Nazi war criminals into Canada after World War II. In 1985, the commission discovered that records which might have been relevant to its inquiry had been destroyed by the Public Archives of Canada three years earlier. The institution came under attack in the popular press, suspected at best with negligence in the destruction of these immigration records and at worst with deliberate intent to hinder a criminal investigation and legal action against Nazi war criminals. Testimony by government archivists and documentation of the appraisal decision proved that the records had been disposed of according to institutional policies and procedures for the destruction of government records. Moreover, a sample of records which had been

National Archives of Canada Act specified the transfer of records of “historic or archival importance” to the archives.

⁶¹ Respondent LAC-1, interview by author, September 8, 2003.

⁶² Respondent LAC-2, interview by author, September 9, 2003 and Respondent LAC-7, interview by author, September 10, 2003.

⁶³ See *Policy on the Management of Government Information* (2003), accessed 3 November 2006, available from http://www.tbs-sct.gc.ca/pubs_pol/ciopubs/TB_GIH/mgih-grdg_e.asp.

retained by PAC revealed that the records had contained no information relevant to the Nazi war criminals investigation.⁶⁴

Though the Public Archives was vindicated of any negligence or wrongdoing in the disposal of the immigration records in the Deschênes Commission's December 1986 report, this experience served as a learning experience for the Public Archives, ultimately becoming one of the catalysts for the institution's revamping of its appraisal policies and documentation of appraisal decisions. While ample documentation had existed to justify this particular appraisal decision, the question had been raised as to whether adequate documentation of appraisal decisions was routinely produced as a part of the appraisal activity. After looking inward, archivists involved in the appraisal of government records concluded that the institution had been fortunate in this particular case, which had been more heavily documented than many appraisal decisions. As a consequence, the then National Archives of Canada embarked on a concerted effort to make its processes for appraisal and disposition more accountable, developing what would become the macro-appraisal process, which is supported by associated documentation which provides rationales for appraisal from the program level through the level of specific disposition decisions.

The controversial case of the "Nazi war criminals" records and the investigation by the Deschênes Commission of PAC's disposition decision-making process which it sparked have become part of the collective consciousness in GRDP, underscoring the importance of the audit trail that now supports LAC's macro-appraisal business process. This event served as a point of reference for several of the archivists who were interviewed for this study, as they contrasted

⁶⁴ See Robert J. Hayward, "'Working in Thin Air': Of Archives and the Deschênes Commission," *Archivaria* 26 (Summer 1998): 122-136 and Terry Cook, "'A Monumental Blunder: The Destruction of Records on Nazi War Criminals in Canada,'" in *Archives and the Public Good: Accountability and Records in Modern Society*, 37-65, ed. Richard J. Cox and David A. Wallace (Westport, CT: Greenwood Press, 2002).

past and current practices for documenting appraisal and spoke of the importance which the institution and which they individually attach to providing an adequate justification for the appraisal process and for disposition decisions. In speaking of practices for documenting appraisal prior to the adoption of macro-appraisal in 1991, one archivist stated, “[I]t was absolutely shocking what you would find in what was then the paper records system internal in this institution about how we arrived at appraisal decisions. In actual fact, where there was documentation, the decision was often deferred to something horrible called selective retention...It took a huge effort to turn this place around.”⁶⁵ Another observed, “Since the macro-appraisal approach, there is an audit trail of decisions, and justification in the body of archival appraisal that oftentimes was not present in the old authorities and this selective retention was simply shirking or putting off to another day the final archival decision. So we have improved enormously in that regard.”⁶⁶ A third opined, “We do a fairly good job of [documenting appraisal decisions] in the past few years because everybody has the sense that we want to be accountable.”⁶⁷

LAC views its Records Disposition and Appraisal Control System (RDCACS) as a mechanism by which it can more effectively demonstrate the institution’s accountability for these functions, making disposition decisions more open and transparent to government agencies and the public.⁶⁸ This database has served as an invaluable appraisal tool for archivists at LAC and records managers at federal records centers since its inception in the late 1990s, by facilitating their business processes through ready access to documentation relevant to disposition decisions (e.g., Records Disposal Authorities, Agreements for Transfer, Terms and

⁶⁵ Respondent LAC-1, interview by author, September 8, 2003.

⁶⁶ Respondent LAC-5, interview by author, September 9, 2003.

⁶⁷ Respondent LAC-6, interview by author, September 8, 2006.

⁶⁸ See Fortier, “Transparency, Compliance, and Accountability.”

Conditions, Archival Appraisal Reports). At the time of this study, plans were underway to provide tiered access to government agencies and the public to portions of RDACS which would render more open and transparent the disposition and appraisal decisions made by LAC. Since then, access to RDACS has been granted to government agencies, and the Government Archives and Records Disposition program's website notes that public access to the database is coming soon.⁶⁹

The decision to open key portions of RDACS to government agencies and the public, though a conscious effort by LAC to increase accountability for the appraisal activity through making decisions more open and transparent to the public, has been cause for concern among some at LAC about possible negative repercussions resulting from making documentation of disposition decisions available outside of the institution. While expressing some reservations about opening RDACS to government agencies and the public, however, archivists within the GRDP ultimately seem to conclude that the benefits to doing so, in terms of assisting government agencies to improve their recordkeeping practices and helping the public understand LAC's appraisal decisions and the archival holdings that result from them, outweigh the risks. Several interviewees noted that appraisal reports are frank in the assessment of deficiencies in agency information management programs. They fear that some records management staff in government departments might take umbrage at the description of inadequacies in their records management programs, but believe that the analysis contained within archival appraisal reports can serve as a valuable tool to be used by government agencies to rectify such problems.⁷⁰ In speaking of the information and analysis that is synthesized in appraisal reports, one interviewee

⁶⁹ See Government Records Appraisal and Disposition Program, available at <http://www.collectionscanada.ca/information-management/007/007007-1034-e.html>, accessed 5 January 2007.

⁷⁰ Respondent LAC-7, interview by author, September 10, 2003 and Respondent LAC-8, interview by author, September 11, 2003.

offered that those activities add value to records. “This is one area that we spend an awful lot of time doing research and exercising our brain cells to produce something that’s logical and to bring together disparate information into something that has greater value in terms of analysis. And that should be shared with people.”⁷¹

The prospect of opening RDACS to the public gave appraisal archivists greater cause for reflection. This is an issue to which LAC staff has clearly given considerable thought. Much of the concern stems from a perception that the public does not understand that legally authorized destruction of government records is a necessary aspect of records management and an important archival function with which LAC is charged. As one archivist expressed it, “The idea that you could actually destroy records doesn’t fly...people are horrified.”⁷² Another ruminated:

The document [the appraisal report] is a good representation of the process that we’ve been through. In terms of its availability across the board...the question is should RDACS be made available to anyone who wants to look at it? Part of me says, “Sure, why not? The work is there. It’s documented.” And then part of me thinks somebody who doesn’t have anything better to do is just going to go in there and start second-guessing, and it could be a real nightmare. Because of, for whatever reasons, issues taken with the decisions that are being made. I don’t think that’s necessarily a reason for not making information available. But on the other hand, I think if and when that decision is taken to open RDACS up, the institution had better be aware that it could cause this interest and there may be repercussions....It will be interesting to see, if it does get opened up, if there’s a flurry of activity initially, researchers or journalists digging to see if they can find something. And then maybe it will just die down and people will see it as a tool, like, “I wonder why they didn’t keep that?”⁷³

In addition to some hesitancy about opening appraisal reports to public scrutiny, however, there is also curiosity about the uses which those outside the archival community might make of these

⁷¹ Respondent LAC-8, interview by author, September 11, 2003.

⁷² Respondent LAC-7, interview by author, September 10, 2003.

⁷³ Respondent LAC-6, interview by author, September 10, 2003.

documents. One interviewee speculated, “I think we’ll see a rise of them being cited and used in other contexts as well...by historians and others that are interested.”⁷⁴

At present, LAC is proceeding with plans to make RDACS available to the public through its website. This tool is intended to assist the public in understanding what the institution has and does not have in its archival collections. Through contextualizing appraisal decisions in terms of government functions and providing access to records disposition authorities, LAC hopes that it will be able to assist the public in locating records which might be held in government departments rather than in its archival holdings. Most significantly, though, providing public access to this invaluable resource originally developed to facilitate the appraisal business process will provide the public with an accounting of LAC’s disposition decisions, through making the record of the institution’s legal mandate more open. In the final analysis, concludes one archivist, transparency “really is all about the documentation, making it available. And not just to a little cadre of archival professionals in the world, but also to our clients, to the Canadian public, and one could even argue, to the world public.”⁷⁵

Summary

This chapter established the statutory responsibility of LAC for records disposition, summarized LAC’s significant contributions to the archival profession’s understanding of appraisal, and surveyed practices for documenting appraisal at LAC as of September, 2003. It also discussed the modifications that were being made to the appraisal business process at the time of the study which would, in turn, impact the record produced by LAC as an audit trail of its disposition function. Appraisal is heavily documented at LAC, from the level of the program through individual disposition decisions. This emphasis on producing a record that provides a

⁷⁴ Respondent LAC-8, interview by author, September 11, 2003.

⁷⁵ Respondent LAC-4, interview by author, September 9, 2003.

rationale for selection and records disposition activities flows from an organizational culture where accountability is a priority. The next chapter examines documentation of appraisal at the National Archives of Australia.

CHAPTER SIX

APPRAISAL DOCUMENTATION AT THE NATIONAL ARCHIVES OF AUSTRALIA

This chapter is the last of three that addresses the first research question posed in this study: How is appraisal documented? The institutional context for Chapter Six is the Government Records Branch of the National Archives of Australia.¹ This case study begins with an overview of NAA's statutory authority for appraisal and a review of significant contributions that NAA has made to the archival profession's understanding of appraisal. The emphasis of this chapter is an explanation of practices for documenting appraisal at NAA that were current in fall 2003. It will also discuss significant changes that have been made to NAA's appraisal strategy, and hence its documentation of appraisal, since the time this research was conducted. The final portion of the chapter discusses accountability in appraisal at NAA, as reflected in the written record of the appraisal process and disposition decisions. This account of appraisal at NAA is supplemented by comments gleaned from interviews conducted with staff responsible for carrying out this function.

NAA's Statutory Authority for Records Disposition and Appraisal

The effort to establish a national archival institution in Australia which would be vested with statutory responsibility for the disposition and appraisal of Commonwealth records dates to 1927, with the drafting of the country's first Archives Bill. In the years following Australia's Federation in 1901, Commonwealth departments were charged with ensuring the creation, preservation, and disposal of records necessary for the conduct of government business. Prior to World War I, the volume of records produced by Commonwealth agencies was not a

¹ Prior to being designated as the National Archives of Australia in 1984 when the *Archives Act 1983* came into effect, the institution was known as Australian Archives (1974-1983) and the Commonwealth Archives Office (1961-1973). Its organizational antecedents date to 1942, when it was established as the Archives Division within the Commonwealth National Library.

management concern, but by the 1920s, the question of how to deal with increasing quantities of records no longer needed for business purposes had become an issue. Departments responded by disposing of non-current records, some adopting a “brisk, spring-cleaning approach from the start.”² A 1920 directive to Commonwealth agencies to transfer records from World War I with historical value to the War Museum indicates that the government had some concern about the preservation of significant records. In 1925, Parliament passed legislation which transformed the War Museum into the Australian War Memorial, rendering this institution the only government body with statutory authority to preserve records of historical value. Delays in building the facility to house such records, however, indicated that despite this new legislation, archives remained a relatively low priority for the government.³

Among the parties concerned about the potential destruction of records of national significance was the Commonwealth Parliamentary Library. In 1926, the Parliamentary Library Committee commissioned academics Ernest Scott and George Arnold Wood to prepare recommendations related to the preservation of records of potential national significance. In his history of the unsuccessful Archives Bill of 1927, Ted Ling writes that the Scott-Woods report called for the creation of archival legislation which would contain the following provisions:

- the establishment of a Records Office under the control of a Keeper;
- the transfer of departmental records to the Records Office once their administrative use had ceased; and
- the Keeper deciding which records would be preserved as archives and which would be destroyed, and in making such decisions that person would be assisted by an advisory board.⁴

² Hilary Golder, *Documenting a Nation: Australian Archives – The First Fifty Years* (Canberra: Australian Government Publishing Service, 1994), 4. Other sources used in compiling this overview of NAA’s statutory authority for records disposition and appraisal are: Ted Ling, “The Commonwealth’s First Archives Bill 1927,” *Archives and Manuscripts* 29 (May 2001): 98-109; “A National Archives System: A Background Document,” *Archives and Manuscripts* 5 (November 1973): 104-109; Clive Smith, “The Australian Archives,” *Archives and Manuscripts* 8 (June 1980): 33-40; and George R. Smith, “Before and After the Lamb Report,” *Archives and Manuscripts* 7 (August 1977): 34-40.

³ Golder, 9.

⁴ Ling, “The Commonwealth’s First Archives Bill 1927,” *Archives and Manuscripts* 29 (May 2001): 100.

Significantly, the Scott-Wood report called for the creation of an independent archives agency, reporting to the Speaker of the House of Representatives and the President of the Senate. A second report issued the next year and prepared by Aubrey Holmes of the Navy Office also called for the passage of archival legislation and the creation of the position of Chief Archivist to oversee this new archival authority. The Holmes report proposed that “the destruction [of government records] should only be undertaken with the approval of a committee comprising representatives from the archival authority and government departments.”⁵

At the urging of the Parliamentary Library Committee, a draft Archives Bill, influenced directly by the Scott-Wood report, was drafted in November 1927. The proposed legislation called for the creation of an independent archival authority responsible to the Speaker of the House of Representatives and to the President of the Senate. The draft bill included the provision that, “All records deemed by relevant Ministers to be of historical value would, once their administrative use had ceased, be transferred to the Archives,” after which the Archivist would assume responsibility for them.⁶ The legislation indicated that the Archivist, not department heads, would have the authority to make the final determination of which records possessed historical value.

The Parliamentary Library Committee reviewed the proposed legislation in December, 1927. The Committee made several significant revisions to the language of the bill which relate to the Archivist’s role in the appraisal and disposition of records. First, they specified that while government Ministers should consult with the Archivist regarding the national significance of records being assessed for retention or destruction, the final decision about historical value should rest with the Governor-General, not the Archivist. The Archives Bill was amended and

⁵ Ibid., 101.

⁶ Ibid., 102.

sent to Cabinet, which considered it in March and April 1928. The Prime Minister's Office decided to request information from Canada and South Africa about those countries' archival systems before taking further action. By the time this information was received in 1929, the Great Depression was underway, and the Bill was never reconsidered by Cabinet or forwarded to Parliament. When a reconstituted Parliamentary Library Committee revisited the question of archival legislation in 1930, it determined to take no further action on the matter in light of current financial legislation.

Although no further action was taken regarding the Archives Bill, the Commonwealth Parliamentary Library continued to express concern about the continuing disposal of records of potential national significance by Commonwealth departments. In 1932, the Prime Minister cautioned agencies to consult with the Commonwealth Librarian before disposing of any records aside from those of a routine, administrative nature. Without statutory authority making such consultation a legal requirement and clearly establishing the final arbiter in cases where department heads and the Librarian disagreed about the value of records, however, this measure was nothing more than a gesture.⁷ For the next decade, the problem of providing for the systematic disposition and appraisal of government records would again be relegated to the back burner.

In 1942, World War II and the rise in documentation produced by government agencies as part of the war effort forced the issue of addressing disposition and appraisal of Commonwealth records. The War Archives Committee (WAC) was established and tasked with ensuring the preservation of records documenting Australia's involvement in both World Wars. As a result of the WAC's work, the Australian War Memorial and the Commonwealth National Library were designated as provisional archival authorities in 1943 and were given responsibility

⁷ Golder, 8.

for granting departments permission to dispose of records no longer required for operational purposes. The former was to oversee records disposal for defense agencies, while the latter was to supervise records destruction for civil agencies. The unit within the Commonwealth National Library charged with carrying out this task was the Archives Division, which had been created in 1942. In 1944, Ian MacLean was hired as the first Commonwealth Archives Officer and assumed responsibility for working with government departments to determine which records of civil agencies were appropriate for destruction and which should be retained as records of historical value.

The War Archives Committee decreed that government departments were responsible for identifying how long they needed to retain records for administrative purposes, but required departments to consult with the appropriate archival authority for permission to dispose of any records. One account of the development of a national archives system in Australia notes, “Records not designated as being archives by the archival authorities in collaboration with each Department could be destroyed (subject to certain requirements) without further sanction.”⁸ Among the requirements necessary to authorize the disposal of Commonwealth records were the written permission of the appropriate archival authority (the Australian War Memorial for defense agencies and the Commonwealth National Library for civil agencies) and the written permission of the WAC. The regulations developed by WAC to facilitate the systematic disposal of government records also established an early tradition, which persists today, of collaboration between government agencies and archival authorities in order to ensure that records of historical value are identified. In 1946, the War Archives Committee was renamed the Commonwealth Archives Committee (CAC) and charged with developing recommendations for a permanent

⁸ “A National Archives System: A Background Document,” *Archives and Manuscripts* 5 (November 1973): 104-109. The quote is taken from page 105.

national archives system and developing requirements to be followed by government agencies and the two provisional archival authorities. Transforming the WAC into the CAC also indicated the changed mission of this body to provide for the orderly disposal and preservation of past and future Commonwealth records, not simply those necessary to document the history of Australia's involvement in both World Wars.

In 1949, the Public Service Board, in an effort to promote the efficient and economical management of government records, provided for the deposit of records identified as having permanent or long-term temporary value by beginning to establish repositories in State capitals. This was also a significant year in terms of clarifying responsibility for authorizing destruction of government records, with the CAC designating the Commonwealth National Library's Archives Division as the sole archival authority for all government departments. The single exception related to the records of the armed services, which remained under the auspices of the War Memorial. The strides made in providing for the systematic, supervised disposition and appraisal of Commonwealth records during the 1940s culminated with the drafting of a second round of archives legislation; however, this proposed bill was never acted upon and the issue of statutory authority for the disposition of government records would remain unresolved for another three decades.

Though lacking a legal mandate for authorizing the destruction of government records, the Archives Division of the Commonwealth National Library was making strides towards ensuring that records no longer needed for Commonwealth business were disposed of efficiently and that records of historical value were preserved. In 1959, Archives Officer Ian MacLean reported that the majority of the Archives Division's limited resources were going to the

appraisal and scheduling of records.⁹ The legal authority of the Archives Division for the preservation of records of national significance, however, remained an issue of contention due to the long-standing tradition that Commonwealth agencies were responsible for the creation, preservation, and management of their records. A circular issued by the Prime Minister's Department in 1955, *Arrangements for the Management of the Public Records of the Commonwealth Government*, "confirmed the department's responsibility for maintaining adequate records for official purposes and, in the absence of any statutory provision to the contrary, affirmed the department's legal responsibility for all aspects of their management after they ceased to be current."¹⁰

A new era for the institution which is today the National Archives of Australia was ushered in with 1961, when the Commonwealth Archives Office (CAO), within the Prime Minister's Department, assumed the responsibilities formerly held by the Archives Division of the Commonwealth National Library. These duties continued to include providing guidance to agencies regarding the appropriate retention and disposal of records, though CAO still lacked the authority to make final appraisal decisions. In 1966, Cabinet explicitly gave the Commonwealth Archives Office the responsibility to oversee the disposal of records. This mandate resulted from the recommendations of the Interdepartmental Committee, which convened between 1962-1964 to address issues related to the systematic management of the records produced by Commonwealth agencies.¹¹

Cabinet's charge to CAO to supervise the disposition of records did not establish a statutory authority for the appraisal of Commonwealth records. This issue was taken up in 1974,

⁹ Ian MacLean, "Australian Experience in Record and Archives Management," *American Archivist* 22:4 (1959): 392. Cited in G. Smith, 36.

¹⁰ G. Smith, 35.

¹¹ The Interdepartmental Committee replaced the Commonwealth Archives Committee, which had last met in 1958.

when CAO was reconstituted as Australian Archives, with a Director-General appointed to head the agency. Work on an archives bill which would clearly establish the powers of Australian Archives – including those related to appraisal, scheduling, and disposal of records produced by Commonwealth agencies – was a lengthy process. In 1978, this proposed legislation was introduced in Parliament. Among its provisions were measures to clarify the responsibility of the archives and government agencies with respect to records disposal by establishing that, “No Commonwealth records may be destroyed without the concurrence of the Australian Archives whose responsibility it is to safeguard the broader national interests as distinct from those of the department which created the records.”¹²

This legislation, ultimately passed as the *Archives Act 1983* (enacted in 1984), established the National Archives of Australia as the government agency with statutory authority for providing for the preservation and disposition of records produced by Commonwealth agencies. Section 5 spells out the functions of NAA. The institution’s appraisal mandate is articulated in section 5(2)(d), which assigns NAA the function “to ascertain the material that constitutes the archival resources of the Commonwealth.”¹³ Section 6(1) grants NAA the powers necessary to carry out the functions designated in Section 5, giving the institution the authority to “undertake the survey, appraisal, accessioning, arrangement, description and indexing of Commonwealth records,”¹⁴ and the power to “authorize the disposal or destruction of Commonwealth records.”¹⁵

¹² Clive Smith, “The Australian Archives,” *Archives and Manuscripts* 8 (June 1980): 33-40. The quote is taken from page 38.

¹³ See *Archives Act 1983*, §5 (2)(d), accessed 3 November 2006, available from http://www.austlii.edu.au/au/legis/cth/consol_act/aa198398/.

¹⁴ See *Archives Act 1983*, §6 (1)(b), accessed 3 November 2006, available from http://www.austlii.edu.au/au/legis/cth/consol_act/aa198398/.

¹⁵ See *Archives Act 1983*, §6 (1)(h), accessed 3 November 2006, available from http://www.austlii.edu.au/au/legis/cth/consol_act/aa198398/.

The *Archives Act 1983* establishes the Director-General of NAA as the party responsible for carrying out the functions spelled out in this legislation. Section 8(1) authorizes the Director-General to delegate the powers conferred in the *Archives Act 1983* to assist in carrying out NAA's statutory responsibilities.

Sections 24 and Sections 25 of the *Archives Act 1983* are also relevant to the disposal of records produced by Commonwealth agencies. Section 24 pertains to the disposal and destruction of Commonwealth records, with subsection 1 prohibiting these activities and subsection 2 defining exemptions under which Commonwealth records may be legally destroyed.

These exemptions include the destruction of records:

- (a) as required by any law;
- (b) with the permission of the Archives or in accordance with a practice or procedure approved by the Archives; [or]
- (c) in accordance with a normal administrative practice, other than a practice of a Department or authority of the Commonwealth of which the Archives has notified the Department or authority that it disapproves.¹⁶

These provisions clearly indicate that NAA's authority for records disposal takes precedence over that of departments. Section 25(1) is notable because it discusses the responsibilities that NAA has to the National Archives of Australia Advisory Council (NAAAC), which is created in Section 10 of the *Archives Act 1983*.¹⁷ This legislation requires that NAA provide the Council with information about its practices and criteria for disposal activities, and any modifications that might be made to them. It does not, however, require that NAA consult with NAAAC in making appraisal decisions.¹⁸

¹⁶ See *Archives Act 1983*, §24 (2), accessed 3 November 2006, available from http://www.austlii.edu.au/au/legis/cth/consol_act/aa198398/.

¹⁷ See *Archives Act 1983*, §10, accessed 3 November 2006, available from http://www.austlii.edu.au/au/legis/cth/consol_act/aa198398/.

¹⁸ See *Archives Act 1983*, §25, accessed 3 November 2006, available from http://www.austlii.edu.au/au/legis/cth/consol_act/aa198398/.

NAA's Primary Contributions to Appraisal Practice

The National Archives of Australia's current approach to appraisal is still in its nascent stages, having been officially adopted by NAA in April of 2000 as part of the institution's *e-Permanence* campaign.¹⁹ NAA's appraisal strategy emerged from efforts within Australia throughout the 1990s to establish standards for recordkeeping. Due in part to a series of accountability scandals which had rocked both the public and private sectors in Australia beginning in the 1980s and to an increasing recognition that traditional recordkeeping practices were proving inadequate to manage increasingly electronic records systems, the Australian archival community sought to standardize best practices for recordkeeping. In 1996, the resulting Australian standard for recordkeeping, AS 4390, was issued.²⁰

This approach to recordkeeping, which served as the basis for the recordkeeping standard adopted in 2001 by the International Organization for Standardization as ISO 15489, hinges on having records creators conduct an intensive analysis of their organizations' requirements for records in order to ensure that they produce, manage, and preserve documentation necessary to meet their business needs, accountability obligations, and the expectations of internal and external stakeholders.²¹ An agency accomplishes the identification of recordkeeping requirements through researching the organization's context and its business functions in order to ascertain that relevant documentation is generated to provide evidence of institutional activities. Thus, this methodology embeds appraisal within a broader framework for recordkeeping. It adopts a risk management approach to appraisal in which, "Appraisers are asked to analyse the

¹⁹ For information about the *e-Permanence* initiative, see National Archives of Australia, "Recordkeeping," 2000, accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/default.html>. This publication outlines strategies for managing records appropriate to an electronic environment.

²⁰ Standards Australia, *Australian Standard AS 4390-1996: Records Management* (Homebush, New South Wales: SAI Global Business Publishing, 1996).

²¹ See International Organization for Standardization, *ISO 15489-1 Information and Documentation – Records Management – Part I: General* and *ISO/TR 15489-2 Information and Documentation – Records Management – Part II: Guidelines* (Geneva: International Organization for Standardization, 2001).

consequences of not meeting identified requirements or interests.”²² Meeting the expectations of internal and external stakeholders is also an expressed requirement of appraisal within the ISO 15489 model. For this reason, NAA has begun to experiment with community consultation as part of its appraisal process.²³

Following the adoption of AS 4390, NAA reassessed then current appraisal practices. As a result of this process, the institution concluded that existing practices for selecting records were ill suited for use in an increasingly electronic recordkeeping environment. NAA also initiated a collection review in order to assess the records previously selected for retention as national archives as a means of gauging how well the institution’s appraisal practices had been working. Anne-Marie Schwirtlich, then Acting Director General of the National Archives of Australia, has written of this exercise:

In November 1998 the Archives held 250 kilometers of records identified as archives. This amounts to around 25 million files. By comparison the National Archives and Records Administration of the USA held 577 kilometers and the Public Record Office held 167 kilometers. Our central government was 98 years old at the time, the USA’s was 200 years old and the UK’s far, far older. Another way of looking at these figures is that per head of population we had 5.5 times more than the USA and almost 5 times more than the UK. Even allowing for jurisdictional differences in recordkeeping practices we had to ask ourselves if our records were likely to be five times more significant.²⁴

NAA recognized that if it continued to appraise records according to established practices, it would be investing an ever-greater portion of its limited resources in storing its holdings, leaving fewer resources available for preserving and providing access to records. The institution asked itself if such an approach was justified, especially in light of questions raised during the

²² Russell Kelly, “The National Archives of Australia’s New Approach to Appraisal,” *Archives and Manuscripts* 29 (May 2001): 72-85. The quote is taken from page 75.

²³ See Adrian Cunningham, “Commonwealth Records and Social Memory: If We Can’t Remember Everything, Can We Choose What to Forget?,” *Australian Historical Association Bulletin* 91 (2002): 79-82.

²⁴ Anne-Marie Schwirtlich, “The Functional Approach to Appraisal – The Experience of the National Archives of Australia,” *Comma* 2002.1-2: 57-62. The quote is taken from pages 57-58.

collections review process about the quality of current archival holdings. By 1998, NAA had determined that a new approach to appraisal was necessary. Thus, it suspended the records disposal authorities resulting from its existing records-centered approach to appraisal in order to investigate more effective ways of conducting its selection activities.

After researching various top-down approaches to appraisal being undertaken internationally by other organizations, including documentation strategy, institutional functional analysis, and especially macro-appraisal as conducted by the national archival institutions in Canada and the Netherlands, NAA determined that an approach to appraisal based on government functions would be best suited to the Australian environment. NAA felt that an advantage of adopting a functions-based approach to appraisal was that staff in Commonwealth agencies would find “appraisal decisions based on functions...easier to apply....because the link to their administrative context would be clearer.”²⁵ Working closely with the State Records Authority of New South Wales and with government agencies, NAA developed a methodology to guide government departments through the process of designing and implementing recordkeeping systems appropriate to an electronic records environment. In March 2000, NAA issued *Designing and Implementing Recordkeeping Systems: Manual for Commonwealth Agencies*. It also published *The Appraisal Guidelines for Commonwealth Records* on its website. These tools for information management were tested in a number of government agencies. In 2001, NAA reviewed the initial manual and modified it based on the experience of implementing it in various pilot settings. Following these revisions, NAA released *DIRKS: A Strategic Approach to Managing Business Information*.²⁶ The framework for appraisal activities is

²⁵ Schwirtlich, 57.

²⁶ National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information* (September 2001; revised July 2003), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>.

outlined in Steps A-C of the DIRKS manual. The functions-based approach to appraisal outlined in DIRKS is consistent with the methods for identifying organizational recordkeeping requirements outlined in AS ISO 15489 – 2002.²⁷

Initially, functions-based appraisal at NAA focused on conducting a systematic analysis of all government functions, without making judgments as to the most significant activities. Adrian Cunningham and Robin Oswald explain the original decision not to prioritize among government functions before implementing functions-based appraisal by stating that, “The decision to focus appraisal projects on the agency rather than on the whole of government reflected long-standing practice within the NAA and also the desire to work proactively with individual agencies to help them improve their recordkeeping in line with AS 4390.”²⁸ During the first few years of working with agency records management staff to develop functions-based disposal authorities, however, NAA recognized some fundamental shortcomings of an appraisal strategy focused on individual agencies. This orientation, which did not provide for a whole-of-government view of Commonwealth governance functions, created the risk that in making appraisal decisions, NAA might not locate the best archival record to document government functions, which in turn could result in gaps or redundancies in Australia’s archival holdings. In addition, from a practical standpoint, treating all functions of government equally did not provide NAA with a mechanism for prioritizing the institution’s appraisal activities and workflow.

By 2003, at the time of this research, NAA had begun to explore how it might integrate a macro-appraisal strategy with DIRKS-based functional appraisal, with the goal of improving the quality of the archival record. Since then, NAA has developed a macro-appraisal strategy to

²⁷ AS ISO 15489 – 2002 was adopted as the Australian Standard for Records Management following the release of ISO 15489. It supersedes AS 4390, upon which the ISO standard was modeled.

²⁸ Adrian Cunningham and Robyn Oswald, “Some Functions are More Equal than Others: The Development of a Macroappraisal Strategy for the National Archives of Australia,” *Archival Science* 5 (December 2005): 163-184. The quote is taken from page 164.

supplement its functions-based appraisal program. As part of this exercise, NAA identified two stages of research that were necessary to develop a macro-appraisal framework for the institution:

1. Research into the comparative significance of the functions of government; and
2. Validation and/or adjustment of the results of the stage 1 research through stakeholder and community consultation.²⁹

NAA completed the first phase of research, articulating a basis for comparison among top-level and second-level government functions and further ranking each function into one of six categories ranging from extreme significance to very low significance. The institution then conducted stakeholder and community consultation exercises to assess the validity of the comparative ranking of government functions. As a result of this exercise, NAA now has the means to implement a macro-appraisal framework “to identify and give appraisal priority to those functions of government that are considered to be of high archival and public accountability significance and also to enable the Archives to identify and pursue opportunities for the appraisal of multi-agency functions.”³⁰ This framework is intended to be flexible enough to evolve over time as government functions and their significance change.³¹

²⁹ Ibid., 175.

³⁰ Ibid., 167.

³¹ In addition to Cunningham and Oswald’s account of the first phase of this research, see full reports of NAA’s website for full reports of its macro-appraisal initiative: National Archives of Australia, *Whole-of-Government Functional Analysis: The Relative Significance of Functions of the Australian Government 1975–2005*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Whole-of-government-functional-analysis.html>; and, National Archives of Australia, *Macro-appraisal: Results of Consultation*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Macro-appraisal-report.html>.

Accounting for Appraisal at NAA

The site visit to the National Archives of Australia (NAA) in Canberra occurred in August, 2003. Prior to this trip, the researcher examined comprehensive program-level documentation related to NAA's appraisal methodology, which is available through the institution's website.³² At NAA, the researcher was given appraisal documentation for three agencies. This access was granted with the permission of the agencies, which produce much of the documentation generated during the appraisal process. This information, which relates to the internal business functions of Commonwealth agencies, is not generally open to the public. Interestingly, identifying what constituted official documentation of appraisal at the National Archives of Australia was initially a challenge. The Government Recordkeeping Branch maintains extensive documentation in NAA's electronic recordkeeping system of Steps A-C of the *Designing and Implementing Recordkeeping Systems* manual, or DIRKS, process, which is the basis upon which disposition decisions are made. Communication between various units at NAA is also maintained, as are Records Disposal Authorities. There is, however, no summary document of the disposition process such as an appraisal memo or an archival appraisal report. Following discussion with several members of the Government Recordkeeping Branch, the researcher determined that the final products of DIRKS A, B, and C and the Records Disposal Authority would constitute appraisal documentation for the purposes of this study, as NAA felt that this is the information that would be produced in the event that a disposition decision were questioned. The researcher was also granted access to NAA's intranet during the site visit, which enabled her to examine internal directives and working documents regarding the disposition process.

³² See "Appraisal and Disposal: Deciding What Records To Make and Keep," accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/summary.html>. Key pieces of program-level appraisal documentation will be discussed later in this section.

The researcher conducted interviews with ten staff at NAA in order to supplement the analysis of appraisal documentation. These interviewees included archivists with responsibility for various aspects of appraisal, ranging from policy to implementation. The archivists who were interviewed were assured that their responses would be treated confidentially in order to encourage frank responses. Interviewees are identified in this study report as Respondents NAA-1 through NAA-10. While the interview questions solicited information about NAA's practices for documenting the appraisal process and disposition decisions at the time this research was conducted in August, 2003, the archivists who participated in this study also provided responses which reflected how then current methods for documenting appraisal differed from those used in the past. More significantly, their responses also provided insights into initiatives underway at NAA at the time of this research which were intended to streamline and refine the institution's appraisal strategy. Thus, while the account that follows is a snapshot of NAA's practices for documenting appraisal in August, 2003, that picture is supplemented by insights from NAA staff that reference past methods of documenting appraisal or point to anticipated changes in the appraisal process and its associated documentation.

Program-level Documentation

The National Archives of Australia's appraisal methodology is heavily documented at the program level. The foundational policy statement, *Why Records Are Kept: Directions in Appraisal*, articulates NAA's objectives and strategy for selecting Australia's archival record.³³ This document is available to the public through NAA's website, but like the other program-level documentation of appraisal available online, appears to be targeted primarily towards the

³³ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal* (March 2000, revised 2003), accessed 3 November 2006, available from http://www.naa.gov.au/recordkeeping/disposal/why_keep/summary.html. This document is an expansion of NAA's 1998 discussion paper, *Making Choices: Deciding Which Records to Keep for Posterity*.

Commonwealth agencies which are the Government Records Branch's primary clientele and collaborators in the appraisal process. *Why Records Are Kept* discusses the importance of Commonwealth records and stresses the necessity of appraising records in order to determine agency recordkeeping requirements and to identify that portion of government records which should be retained as national archives. This policy document adopts a broad definition of appraisal, noting that, "Appraisal is a process that identifies the need for records."³⁴ *Why Records Are Kept* ties appraisal activities to larger recordkeeping issues, stating the institution's commitment to "promote good recordkeeping to enhance the value of Commonwealth records as evidence for administrative purposes, accountability, and as a resource for research."³⁵ It stresses that there are multiple stakeholders in the records produced by Commonwealth agencies, both within the government and within the larger community, and that agencies and NAA must consider the needs of all stakeholders in government records in their appraisal and disposal activities.

Why Records Are Kept states clearly that not all Commonwealth records can be retained. It addresses practical constraints that prevent retaining all records, focusing on issues of resources and technology. Best practices for recordkeeping are also cited as a reason that not all records are retained. The document observes that there is a "prevailing view, within the [recordkeeping] community, that not all records need to be retained; that it is acceptable or desirable to dispose of records when they are no longer required."³⁶ This policy-level document

³⁴ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, "Foreward," (March 2000, revised 2003), accessed 3 November 2006, available from, http://www.naa.gov.au/recordkeeping/disposal/why_keep/foreword.html.

³⁵ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, "Why Keep Commonwealth Records?," (March 2000, revised 2003), accessed 3 November 2006, available online, http://www.naa.gov.au/recordkeeping/disposal/why_keep/why.html.

³⁶ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, "Why Aren't All Records Retained?," (March 2000, revised 2003), accessed 3 November 2006, available online, http://www.naa.gov.au/recordkeeping/disposal/why_keep/records.html.

outlines NAA's approach to appraisal and the objectives and criteria that NAA uses to identify the archival record of Australia. Risk management is introduced as a central part of the institution's approach to appraisal, as is accountability:

[W]e will try to ensure that the requirements for, and various interests in, Commonwealth records are taken into account and that records are authorised for disposal only after due consideration of the risks, benefits, and costs....This process will involve identifying the stakeholders with interests in Government functions and activities and associated records, and examining the risks of not meeting those interests.....Our task is to make these judgements of behalf of the Government and the Australian community....we are aiming for a balanced, accountable approach that is open to the range of uses that Commonwealth records have for different stakeholders over time."³⁷

NAA's appraisal policy identifies five objectives which the institution considers when assessing whether records should be retained as national archives. Four of these objectives relate to governance, which is the functional context within which NAA operates. A fifth goal considers records which might have significance independent of the governance context. NAA's appraisal objectives are:

- To preserve concise evidence of the deliberations, decisions, and actions of the Commonwealth and Commonwealth institutions relating to key functions and programs and significant issues faced in governing Australia.
- To preserve evidence of the source of authority, foundation and machinery of the Commonwealth and Commonwealth institutions.
- To preserve records containing information that is considered essential for the protection and future well-being of Australians and their environment.
- To preserve records that have a special capacity to illustrate the condition and status of Australia and its people, the impact of Commonwealth government activities on them, and the interaction of people with the government.

³⁷ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, "Our Approach to Appraisal," (March 2000, revised 2003), 3 November 2006, available from http://www.naa.gov.au/recordkeeping/disposal/why_keep/approach.html.

- To preserve records that have substantial capacity to enrich knowledge and understanding of aspects of Australia’s history, society, culture, and people.³⁸

NAA’s role in appraisal is to select the best documentation that meets one or more of these program objectives for the nation’s archival record. *Why Records Are Kept* states that in selecting national archives in accordance with these goals, “Other factors being equal, we will give preservation priority to records that are technically good records: that is, they are complete, reliable, authentic, and accessible.”³⁹

Significantly, this policy document establishes the shared responsibility of Commonwealth agencies and NAA for conducting activities related to appraisal and disposal, specifying the roles and responsibilities of agencies and NAA. It affirms that, “Because of the scope of Commonwealth activity, Commonwealth organisations and the Archives have to share the overall workload of appraisal and disposal.”⁴⁰ While NAA alone has the statutory authority to authorize records disposal, it “must rely heavily on Australian Government organisations to identify those of their records that are, or could be, national archives and to manage them appropriately while in their custody.”⁴¹ Agencies are expected to conduct an intensive analysis of their organizational context, their business functions and activities, and their recordkeeping requirements as part of their responsibility for appraisal. The documentation produced during this process, during which NAA staff provide guidance to government agencies, must be

³⁸ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, “Selection of National Archives,” (March 2000, revised 2003), accessed 3 November 2006, available from http://www.naa.gov.au/recordkeeping/disposal/why_keep/selection.html.

³⁹ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, “Selection of National Archives,” (March 2000, revised 2003), accessed 3 November 2006, available from http://www.naa.gov.au/recordkeeping/disposal/why_keep/selection.html.

⁴⁰ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, “Who Is Responsible for Retention and Disposal Decisions?,” (March 2000, revised 2003), accessed 3 November 2006, available from http://www.naa.gov.au/recordkeeping/disposal/why_keep/who.html.

⁴¹ National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, “Our Approach to Appraisal,” (March 2000, revised 2003), accessed 3 November 2006, available from http://www.naa.gov.au/recordkeeping/disposal/why_keep/approach.html.

submitted to NAA, which will issue agencies records disposal authorities for records resulting from their business functions once it feels that recordkeeping requirements have been satisfied.

The National Archives of Australia began the process of developing what has evolved into its policy-level document, *Why Records Are Kept*, the late 1990s. Several archivists who were interviewed for this study provided insights into the process of developing this program policy framework, which represents a consensus of NAA's current understanding of best practice in appraisal. In 1998, NAA released a discussion paper, *Making Choices: Deciding Which Records to Keep for Posterity*, for consideration by internal and external stakeholders. Within NAA, there was much debate involved in reaching this shared understanding of the institution's appraisal program. One archivist recalled, "It was discussed widely within the organization, with rooms full of people in heated discussion about how we would go about [implementing the emerging approach to appraisal]. There were pitch battles, but it was fabulous, because we ended up with what we previously didn't have, which was a really high-level statement of why we're keeping records."⁴² Another interviewee commented on the institution's efforts to engage the larger community in discussion about NAA's appraisal philosophy, describing this as NAA's first exercise in serious consultation with the community about appraisal. Respondent NAA-2 noted:

We got some comments. I wouldn't say we were overwhelmed with comments, but we got a reasonable number....I guess because the inner workings of an archival institution are mysterious to the average individual and because archives have tended to conduct appraisal very much behind closed doors, you can't throw open the doors and expect people to engage constructively in the process. That's probably asking a bit much, so the question is, well, how do you lay the groundwork for that, to make it a successful exercise?⁴³

⁴² Respondent NAA-5, interview by author, August 27, 2003.

⁴³ Respondent NAA-2, interview by author, August 26, 2003.

NAA's experience in consulting with the community in shaping its appraisal policy document, therefore, served as a lesson for the institution to guide future efforts to engage the public in its appraisal deliberations.

The primary tool which NAA, in close collaboration with Commonwealth agencies, relies on to implement the organization's approach to appraisal is *DIRKS: A Strategic Approach to Managing Business Information*, into which appraisal and disposal exercises are embedded.⁴⁴ In collaboration with the State Records Authority of New South Wales, NAA developed a methodology for records management corresponding to Australian Standard AS 4390 – 1996, *Records Management*.⁴⁵ In March 2000, the NAA issued *Designing and Implementing Recordkeeping Systems: Manual for Commonwealth Agencies*. This model for information management was tested in a number of government agencies. In 2001, NAA reviewed the initial manual and modified it based on the experience of implementing it in various pilot settings. Following these revisions, NAA released the current version of the DIRKS manual, which complies with AS ISO 15489 – 2002.

The DIRKS manual presents an eight-stage methodology for the management of records produced by government agencies. This account considers only the three phases of the DIRKS model that pertain to appraisal and disposal activities, which are articulated in at the front-end of this recordkeeping strategy as Steps A, B, and C of the DIRKS methodology. Step A involves the identification and documentation of the role of the organization and the environment in

⁴⁴ The DIRKS manual, along with associated documentation, is available through the Government Recordkeeping Branch's website. See National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, (September 2001; revised July 2003), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>.

⁴⁵ Although the State Records Authority for New South Wales and NAA worked together in the development of the DIRKS methodology and various tools utilized in its application, such as the Keyword AAA Thesaurus, the following account of the appraisal process pertains exclusively to NAA's practice. The implementation of DIRKS at NAA and at the State Records Authority for New South Wales has taken different paths, especially post-2001. Respondent NAA-5, interview by author, August 27, 2003.

which it operates, while Step B requires an analysis of the agency's business activities, and Step C entails the identification of the agency's recordkeeping requirements. Appendix 8, "Procedures for Developing a Records Disposal Authority in the Commonwealth" is also considered, as it provides guidance to agencies for preparing an important component of appraisal documentation. The method of appraisal outlined in the DIRKS manual is an intensely research-oriented and documentation-rich process. Agencies, rather than NAA, are responsible for conducting the research necessary to produce the documentation required by the DIRKS model. Archivists at NAA consult with agency staff throughout this process, but agencies must compile the information needed to identify their organizational recordkeeping requirements and to make recommendations to NAA appraisal staff regarding which records might be of archival significance. NAA makes appraisal decisions and approves records disposal authorities only after they receive sufficient documentation from agencies upon which to make judgments about agency and stakeholder recordkeeping requirements. NAA staff do not examine records as part of this appraisal process.

NAA advises agencies that implementing the DIRKS model properly is a time-consuming and resource-intensive process, and that institutional commitment is essential to adopting this strategy for recordkeeping. An incentive for undertaking a DIRKS analysis, however, is that once completed, the information assembled provides the organization with a comprehensive picture of the relationships among its operating environment, business activities and functions, and recordkeeping requirements. This perspective allows organizations to minimize risks by focusing their recordkeeping efforts at ensuring the creation, maintenance, and preservation of records needed to meet legal and accountability requirements, as well as community expectations. It is also a necessary process for organizations which seek

authorization to legally dispose of records that are no longer required for legal or operational purposes.

Step A of the DIRKS methodology entails a “Preliminary Investigation” of the organization. This analysis investigates the role of the organization, its structure, and operating environment to serve as a context for assessing the organization’s recordkeeping system and recordkeeping activities. NAA notes that three benefits can be anticipated by agencies completing Step A:

- an understanding of your organisation and the administrative; legal, business; and social contexts in which it operates;
- a general appreciation of your organisation’s recordkeeping strengths and weaknesses; and
- a sound basis for defining the scope of your organisation’s recordkeeping project and presenting a business case for managerial support.⁴⁶

This portion of the DIRKS manual guides the agency through the process of conducting a preliminary investigation of the organization, identifying resources and prerequisites to conducting this research, suggesting sources that will need to be consulted during the preliminary research, and providing a checklist of activities to manage workflow. This program-level documentation for DIRKS Step A also directs agencies to various appendices of the DIRKS manual which provide additional guidance and recommendations for completing a preliminary analysis. The information gathered during this process is synthesized according to “Appendix 5 – Organization Context Document,” or in the DIRKS documentation database.⁴⁷ In the

⁴⁶ National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, Step A – Preliminary Investigation, (September 2001; revised July 2003), available online, <http://www.naa.gov.au/recordkeeping/dirks/dirskman/dirks.html>, 30 September 2006.

⁴⁷ The DIRKS database is a tool designed by NAA to assist agencies in managing information generated during the DIRKS process. Agencies can choose to enter information into the database, or to record it in another format of which NAA has approved. Information about the DIRKS database is available at <http://www.naa.gov.au/recordkeeping/dirks/database/database.html>, accessed 3 November 2006.

organization context document, an agency answers questions that pertain to its role in government, and which are required to provide sources that document the responses provided.

Step B of the DIRKS model engages an agency in an “Analysis of Business Activity.” The goal of this step is “to develop a conceptual model of what your organisation does and how it does it by examining its business activities and processes.”⁴⁸ This understanding is then mapped to the records that result from these activities and serve as evidence of the organisation’s business functions. An agency’s examination of its business activity incorporates research using documentary sources and interviews to confirm and clarify business functions and the resulting documentation. Agencies are guided through this process of analyzing business activities by this portion of the DIRKS manual. They are directed to appendices providing more detailed instructions for completing Step B, as well as to other tools developed for use in managing government records. Two such resources are the Australian Government’s Interactive Functions Thesaurus (AGIFT), which agencies may use to map functions which are shared by multiple organizations, and the Keyword AAA Thesaurus, which agencies must use to describe the unique functions which they perform.⁴⁹ The results of Step B are documented according to “Appendix 7 – Function source document,” or in the DIRKS documentation database.

Step C of the DIRKS methodology, the “Identification of Recordkeeping Requirements,” builds on the analyses conducted during Steps A and Step B. The goal of this stage of the DIRKS process is to identify and document what records an organization must produce in order to provide sufficient evidence of its business functions. Organizations are advised that there are three primary types of recordkeeping requirements which they must meet:

⁴⁸ National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, Step B – Analysis of Business Activity,” (September 2001; revised July 2003), 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>.

⁴⁹ See the Australian Government’s Interactive Functions Thesaurus and the Keyword AAA Thesaurus.

- regulatory (or ‘accountability’ or ‘legislative’) requirements;
- business (or ‘operational’ requirements); and
- community expectations or ‘sociopolitical’ or ‘societal’ requirements.⁵⁰

During Step C of the DIRKS process, agencies examine relevant sources in order to identify their requirements for records creation and to link each requirement to the source from which it is drawn. There are many sources which may provide information about an agency’s recordkeeping requirements, including internal documentation (e.g., corporate policies, guidelines, and manuals); external documentation (e.g., legislation and regulatory requirements); organizational staff; and, consultation with external stakeholders (e.g., shareholders, advocacy groups, and historians). Appendix 1 of the DIRKS model provides a “Guide to Documentary Sources” which agencies should consult in identifying and documenting its recordkeeping requirements. Agencies map recordkeeping requirements to the business classification scheme for agency functions developed as a result of Step B. NAA provides templates and a DIRKS documentation database in which agencies can record and document their recordkeeping requirements, but agencies are not required to use these tools and may assemble the necessary information in other forms which may prove useful to them (though agencies are advised to consult with NAA staff in selecting a presentation format).

An important part of DIRKS Step C involves assessing the risks to the organization of failing to meet the recordkeeping requirements which are identified as part of Step C analysis. This is essential because there can be a variety of negative consequences to organizations which do not produce adequate evidence of their activities. Failing to meet recordkeeping requirements can:

⁵⁰ National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, Step C – Identification of Recordkeeping Requirements,” (September 2001; revised July 2003), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>.

- compromise current or future business activity;
- compromise the organisation's capacity to defend or prosecute claims;
- result in loss of amenity for the organisation;
- attract adverse publicity or community reaction;
- compromise rights of other parties affected by government decisions and actions;
- compromise wider government interests; and
- diminish archival resources.⁵¹

From the perspective of appraisal, understanding the risks associated with not meeting recordkeeping requirements “may influence the length of time the records will be retained, particularly if the risks of disposing of them become moderate to low.”⁵² At the end of Step C, an agency prioritizes its recordkeeping requirements and seeks management approval for them, paying particular attention to any recordkeeping requirements which the risk analysis determined that the agency would *not* meet. Once administrative approval has been secured for recordkeeping requirements, the agency is prepared to draft a records disposal authority to submit to NAA for approval, and to move on to later steps in the DIRKS process, which involve assessing and managing agency recordkeeping systems.

Steps A, B, and C of the DIRKS process serve as the foundation on which functions-based records disposal authorities are constructed. Appendix 8, “Procedures for Developing a Records Disposal Authority in the Commonwealth,” provides guidance to government agencies on how to compile and present to NAA the information that it will need in order to authorize the disposal of records no longer required for legal or operational purposes and to select the portion

⁵¹ National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, Step C – Identification of Recordkeeping Requirements,” (September 2001; revised July 2003), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>.

⁵² National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, Step C – Identification of Recordkeeping Requirements,” (September 2001; revised July 2003), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>.

of records appropriate for retention as national archives.⁵³ Agencies are encouraged to work closely with NAA staff in drafting records disposal authorities. An agency is encouraged to develop records disposal authorities to cover all the functions of the organization, in order to provide a broad perspective of its activities and documentation. Since this is not always feasible, however, NAA will consider records disposal authorities that cover at least one function, provided that the business classification scheme developed in Step B incorporates all agency functions and spells out all of the activities and transactions for the function being appraised. In preparing records disposal authorities, agencies formulate disposal classes which incorporate:

- the function;
- the activities and transactions of the function;
- the description of records types;
- date range of the records; and
- disposal action.⁵⁴

Appendix 8 advises agencies that disposal authorities should be written broadly enough to be applied to existing records of a business function, as well as those that will be created in the future. At the same time, records disposal authorities must be written specifically enough to be useful in sentencing, which is the process in which agencies apply the functions-based disposal authorities which have been approved by NAA to the actual records extant in the organization. Records disposal authorities should identify records classes which may be appropriate for the disposal action “retain as national archives” (RNA), but are also required to include an alternate disposal action to be implemented in the event that NAA determines that these classes do not

⁵³ National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, “Appendix 8 – Procedures for Developing a Records Disposal Authority in the Commonwealth,” (September 2001; revised July 2003), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>.

⁵⁴ National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, “Appendix 8 – Procedures for Developing a Records Disposal Authority in the Commonwealth,” (September 2001; revised July 2003), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>.

constitute part of the archival record. Once a draft records disposal authority is complete, the agency forwards it, along with the final documentation resulting from DIRKS Steps A, B, and C, to the Government Recordkeeping Branch at NAA for approval.

Since this research was conducted in August, 2003, NAA has completed a macro-appraisal exercise to prioritize among government functions. This has resulted in the generation of additional program-level documentation.⁵⁵ The primary goal of this effort was to develop a framework for conducting appraisal activities within a whole-of-government context by rating the significance of government functions and to enable disposal decisions to reflect areas of overlapping functional responsibility. Another perceived benefit of such an approach is that it will assist NAA in making the appraisal process more archives-driven. This whole-of-government functional analysis will help NAA better target its appraisal activities to agencies which produce documentation related to the most important functions. NAA's macro-appraisal initiative is intended to supplement DIRKS functions-based appraisal and to improve the quality of appraisal decisions through establishing a broad picture of government functions within which better disposal determinations can be made.

Initiating the Appraisal Process

While NAA has developed a comprehensive framework and tools to guide disposal activities, appraisal of Commonwealth records remains an agency-driven process. Agencies initiate the appraisal process by requesting to be placed on NAA's DIRKS work schedule. This

⁵⁵ For information on NAA's macro-appraisal activities, see ⁵⁵ Adrian Cunningham and Robyn Oswald, "Some Functions are More Equal than Others" and see full reports of NAA's website for full reports of its macro-appraisal initiative: National Archives of Australia, *Whole-of-Government Functional Analysis: The Relative Significance of Functions of the Australian Government 1975–2005*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Whole-of-government-functional-analysis.html>; and, National Archives of Australia, *Macro-appraisal: Results of Consultation*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Macro-appraisal-report.html>.

is necessary as the staff in the Government Recordkeeping Branch can only accommodate a certain number of agencies at any one time, due to the highly collaborative aspect of conducting functions-based DIRKS appraisal. Implementation of the DIRKS methodology produces a large volume of documentation and entails extensive communication and negotiation between the agency and the archivist responsible working with it before a final product which is acceptable to both parties is agreed upon for each phase. Completing Steps A, B, and C is a lengthy process, which can last for months or years. It is essential, however, to invest the time necessary to produce adequate documentation of an agency's organizational context, business functions, and recordkeeping requirements, because the quality of appraisal decisions rests on the results of the research carried out for DIRKS Steps A, B, and C. Additionally, the ability of agencies to formulate viable disposal classes in functions-based records disposal authorities and successfully apply the authorities approved by NAA through sentencing activities presupposes that DIRKS has been applied successfully.

Documentation of Appraisal Decisions⁵⁶

As the discussion of the DIRKS methodology indicates, Commonwealth agencies, rather than NAA, are responsible for generating the majority of the documentation that relates to particular appraisal decisions. NAA retains extensive documentation of its collaboration with agencies as part of its electronic recordkeeping system. This includes drafts of information produced by agencies as they complete DIRKS Steps A, B, and C; correspondence between the

⁵⁶ This discussion deals with the documentation resulting from the identification of recordkeeping requirements within agencies, upon which functions-based authorities for individual agencies are based. It does not refer to the documentation associated with general disposal authorities that apply to the functions of multiple agencies. For this type of information, consult the *Administrative Functions Disposal Authority* (AFDA). See National Archives of Australia, *Administrative Functions Disposal Authority* (2000), accessed 3 November 2006, available from <http://naa.gov.au/recordkeeping/disposal/authorities/gda/afda/summary.html>. AFDA provides Commonwealth agencies with the authority to dispose of records resulting from seventeen common administrative functions. For other General Records Disposal Authorities, see <http://www.naa.gov.au/recordkeeping/disposal/authorities/GDA/summary.html>, accessed 3 November 2006.

agency and the archivist responsible for overseeing the DIRKS project; and, notes of meetings that take place between the agency and the archives during the DIRKS process. There is not an official package of appraisal documentation at NAA. The interviews conducted with archivists as part of this research, however, indicate that the key documentation of appraisal decisions are the organizational context document resulting from DIRKS Step A, the business classification scheme developed during DIRKS Step B, the function source document resulting from DIRKS Steps B and C which identifies agency recordkeeping requirements, memos reflecting internal consultation regarding the appraisal within NAA, and the final records disposal authority. These are the elements of documentation that NAA would produce should questions about a particular disposal decision be raised.

NAA does not produce a summary document such as an appraisal memo or an appraisal report which synthesizes the information gathered by agencies during the DIRKS process. Some archivists at NAA feel that this is a missing component in the institution's documentation of the appraisal process. One notes, "We need to summarize and synthesize a lot of that information into an appraisal report. I think we have a job to take that raw data and repackage it for public consumption as kind of, well, this is a summary of the appraisal deliberations that we are responsible for under the Archives Act."⁵⁷ This, however, would require an institutional commitment from NAA, as it would require the investment of additional resources into the appraisal process. The level of appraisal documentation produced by NAA is recognized as being closely tied to the requirements of management, as expressed in the form of resources allocated to appraisal activities.⁵⁸

⁵⁷ Respondent NAA-2, interview by author, August 26, 2003.

⁵⁸ Respondent NAA-7, interview by author, August 27, 2003.

Once the agency and the archivist at NAA are satisfied with a proposed records disposal authority, it is circulated for internal consultation with other units at NAA. The divisions which regularly participate in reviewing appraisal recommendations have responsibility for providing reference services and managing the collections. Any revisions resulting from this process are negotiated between the agency and NAA and incorporated into the Records Disposal Authority before it is forwarded for approval to the Director General or one of two delegates who are authorized to sign off on an RDA, specifically the Assistant Director General or the Director of Recordkeeping Implementation in the Government Records Branch.

The Records Disposal Authority itself is viewed as the primary piece of appraisal documentation, as it is the legal instrument which results from disposal activities. This document reflects the outcome of disposal, rather than the process by which it was conducted. In order to gain a picture of the appraisal process behind an RDA, it is necessary to refer to the documentation produced by the agency as part of the DIRKS process and to the records of internal consultations within NAA. Records Disposal Authorities, which are available to the public upon request, contain a combination of standard elements and records class descriptions developed for the particular RDA. All RDAs include an introductory statement, an authorization area, and a class description area. The introductory area includes a description of the appraisal process as conducted within the DIRKS methodology and consistent with AS ISO 15489 – 2002; establishes NAA's statutory responsibility for issuing disposal authorities under the *Archives Act 1983*; instructions to the agency on how to use the RDA; and information about when amendments to RDAs are required. The authorization section indicates the individual within the Commonwealth agency to whom notice of the RDA is given, the scope of the authority, and the NAA delegate who issued the authority. The remainder of the Records Disposal

Authority describes agency functions, lists the types of records resulting from these functions, and indicates the disposal action to be applied to those records (e.g., destroy 15 years after action is completed, retain as national archives).

Accountability in Appraisal

Accountability for appraisal decisions is part of the organizational culture at the National Archives of Australia. One archivist stated that the institution “has always had quite a focus on documenting its decisions....It’s been something that people have seen as important. We’ve always looked at disposal decisions as being really important ones that we needed to be able to explain.”⁵⁹ The methodology for reaching appraisal decisions outlined in DIRKS, with its emphasis on documentation of the source of recordkeeping requirements, can be viewed as a reflection of NAA’s commitment to being accountable for its statutory responsibility for disposal. This approach, in effect, builds accountability into the appraisal process itself.⁶⁰ One interviewee commented, “I’ve been an archivist for a long time, but I really think that DIRKS is a far more accountable mechanism of actually appraising records than I’ve ever been involved with in all my professional career.”⁶¹

To date, the National Archives of Australia has not found itself embroiled in a major controversy stemming from an appraisal decision which the institution has made. The closest that NAA has come to this involved an episode in Queensland in 1998, related to the collection review project that the institution was embarking upon at that time. This reappraisal exercise, designed to assess the quality of NAA’s archival holdings, was the source of some negative publicity for the institution, resulting from misperceptions about the activity. In reflecting on this experience, one interviewee noted:

⁵⁹ Respondent NAA-4, interview by author, August 26, 2003.

⁶⁰ Respondent NAA-10, interview by author, August 29, 2003.

⁶¹ Respondent NAA-3, interview by author, August 26, 2003.

The more difficult questions for us have come up in prospect rather than in retrospect. It has been people who have heard that we're looking at a group of records or something like that, or we're doing a review project and there can be a misinterpretation, like, 'review equals they're destroying everything.' So there is a great deal of suspicion, and it tends to be before we've done something. Someone's heard that we're going to do something and so they try and prevent it happening.⁶²

In responding to the concerns raised about this case, NAA held several public meetings in Brisbane to clarify the proposed collections review project to interested stakeholders, and eventually the controversy died down. One archivist who was involved with this situation observed that the institution gained valuable experience about communications strategies as a result of the collection review controversy, reflecting that, "There's a big lesson for us there in terms of being on the front foot in terms of proactively getting positive messages out there instead of being on the back foot and dealing with negative messages."⁶³ The same interviewee also saw the upside of the collections review episode in Queensland, concluding that, "The good thing about it was that it demonstrated that if you stir up an issue, there's actually quite a bit of enlightened interest out there in the community in the archival heritage of the nation."⁶⁴

One means by which NAA is seeking to make appraisal more accountable and transparent to the public is through developing routines to conduct external consultations with stakeholders as part of the appraisal process. Although there is not a legal imperative for NAA to consult, AS ISO 15489 – 2000, with which the DIRKS model is consistent, places a high priority on consultation with both internal and external stakeholders during the identification of recordkeeping requirements. In keeping with this approach, in 2001 NAA initiated its first serious experiment with stakeholders, seeking feedback into particular appraisal decisions from the Australian Historians Association. NAA found this to be a useful, though time-consuming

⁶² Respondent NAA-4, interview by author, August 26, 2003.

⁶³ Respondent NAA-2, interview by author, August 26, 2003.

⁶⁴ Respondent NAA-2, interview by author, August 26, 2003.

exercise, which generally resulted in valuable comments. At the same time, the experience reminded the institution that, “The appraisal process and how we get to a decision and then how we write that decision down, tends to be very confusing for people who are not archivists.”⁶⁵ Indeed, one archivist, looking back on this early consultation experiment, noted that, “In almost every case in terms of the first round of comments that you get, you’re talking at cross-purposes with people. And that in itself has really highlighted to us the opaque nature of a lot of our supporting documentation.”⁶⁶ By 2003, NAA had determined that continuing community consultations in appraisal on some basis would be beneficial, despite the resources entailed in the process. At the time this research was conducted, NAA was exploring models for a self-selecting approach to consultation, in addition to consultations with specific groups within the community, which was perceived to be elitist, privileging the feedback of some constituencies over others. NAA’s most recent efforts at community consultation in appraisal occurred as part of the institution’s development of a macro-appraisal framework.⁶⁷

The DIRKS process produces ample documentation which records the basis upon which Commonwealth agencies identify recordkeeping requirements and NAA makes disposal decisions. At present, however, the majority of this documentation is not publicly available, in part because it is the agencies which create these records. One interviewee stated:

Our records disposal authorities are public documents. They can be looked at by any member of the public, but I also think that DIRKS documentation should be public. Now, to do that from our perspective we actually have a little bit of liaising to do with our agencies, because in the DIRKS process, agencies present a

⁶⁵ Respondent NAA-4, interview by author, August 26, 2003.

⁶⁶ Respondent NAA-2, interview by author, August 26, 2003.

⁶⁷ See NAA’s report on this consultation process: National Archives of Australia, *Macro-appraisal: Results of Consultation*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Macro-appraisal-report.html>.

lot of information about themselves that perhaps they don't want revealed to other people....I strongly believe that not just the disposal authority should be available, but the documentation as well, to enhance the accountability and transparency of the process that was undertaken.⁶⁸

Discussions about how to make appraisal documentation more accessible are ongoing at NAA.

One option that is being considered, but is felt to be some years off, is to integrate documentation of the end-stage of DIRKS Steps A, B, and C into the institution's CRS database, through which researchers access NAA's collections. This would provide users with a means of accessing administrative information related to the archival processes associated with records that they wish to consult.⁶⁹

Even if documentation regarding appraisal is made available through NAA's search database, the question will remain about how useful that information will be to the public. One archivist commented, "The documentation that we've designed for our functional appraisal regime makes good sense to that pool of people who've always done the appraisal work, but we've never really had any requirement to produce plain English summations of why...we've made these appraisal decisions."⁷⁰ Thus, for such a database to succeed in rendering the appraisal process fully transparent, NAA would need to reexamine its appraisal documentation and consider how to make it more comprehensible. While some of the archivists interviewed during this research felt that a summary appraisal document might alleviate some of the problems with opaque language in appraisal documentation, others had reservations about this. Repackaging appraisal documentation is seen by some within NAA as a potential danger, because, "If you interpret it for a different audience, are you slightly skewing it so that you're

⁶⁸ Respondent NAA-3, interview by author, August 26, 2003.

⁶⁹ Respondent NAA-4, interview by author, August 26, 2003 and Respondent NAA-10, interview by author, August 29, 2003

⁷⁰ Respondent NAA-2, interview by author, August 26, 2003.

saying something different?...I don't think we should be creating something different. We should be making sure that what we have is sufficiently understandable.”⁷¹

The high priority that NAA places on documenting appraisal decisions reflects a risk management approach by the organization. One interviewee commented, “No matter how well, how professionally we do our appraisals, sooner or later... we will be called to account for our decisions....How can we handle it if we're not well-prepared? The impact on us as an organization could be catastrophic....No matter how carefully you conduct any appraisal exercise there's never any guarantee, so all you can do is be as professional as possible and do your level best and be as open and transparent and accountable as possible.”⁷² At NAA, documentation plays a central role in the institution's ability to account for its appraisal decisions.

Summary

This chapter has reviewed the National Archives of Australia's statutory responsibility for records disposal, considered NAA's contributions to professional practice related to appraisal, and examined practices for documenting appraisal at NAA as of August, 2003. NAA has produced comprehensive program-level documentation articulating its policy, objectives, and methodology for conducting appraisal. Documentation generated by agencies completing Steps A, B, and C of the DIRKS process and the functions-based Records Disposal Authorities issued by NAA provide evidence that documents particular appraisal projects. Lastly, this chapter examined the connections between accountability and the appraisal documentation resulting from the appraisal process. The next chapter entails a comparative analysis of practices for

⁷¹ Respondent NAA-2, interview by author, August 26, 2003.

⁷² Respondent NAA-2, interview by author, August 26, 2003.

documenting appraisal at the National Archives and Records Administration in the United States, Library and Archives Canada, and the National Archives of Australia.

CHAPTER SEVEN

COMPARATIVE ANALYSIS OF APPRAISAL DOCUMENTATION AT THE NATIONAL ARCHIVES AND RECORDS ADMINISTRATION, LIBRARY AND ARCHIVES CANADA, AND THE NATIONAL ARCHIVES OF AUSTRALIA

The preceding three chapters described practices for documenting appraisal at the National Archives and Records Administration (NARA), Library and Archives Canada (LAC), and the National Archives of Australia (NAA) in order to address the research question: How is appraisal documented? This chapter offers a comparative analysis of key aspects of appraisal documentation at the three sites studied, with the goal of addressing the second research question which this dissertation explores: What constitutes documentation of appraisal that is adequate to permit archivists to be held accountable for appraisal of public records? This discussion is based on examination of appraisal documentation produced by NARA, LAC, and NAA and interviews with archivists at these three institutions.

Accountability through Appraisal Documentation

At each institution visited as part of this study, the appraisal process results in extensive documentation, providing many possible points of comparison. To focus this examination of the record of appraisal created by NARA, LAC, and NAA, the researcher noted three features that emerged as being especially relevant to the demonstration of accountability through appraisal documentation. Thus, this comparative analysis emphasizes the architecture of appraisal documentation; the availability of appraisal documentation; and the opportunity for public input during the appraisal process.

*Architecture of Appraisal Documentation*¹

Chapters Four, Five, and Six provide detailed descriptions of the practices for documenting appraisal at the National Archives and Records Administration, Library and Archives Canada, and the National Archives of Australia, respectively. The architecture which archivists have developed for documenting appraisal at NARA, LAC, and NAA suggests a professional recognition among government archivists that it is imperative to account for selection activities on a number of levels in order to create an adequate record of how they perform their appraisal responsibilities. The first tier of documentation consists of program-level information which establishes the need for the appraisal of government records, outlines the institution's policy regarding this activity, and describes how the process of appraisal is conducted. A second level of appraisal documentation relates to disposition decisions that have been made regarding administrative records that are generated by more than one government agency. This information provides guidance and legal authorization to government agencies for the disposal of common administrative records. The third category of appraisal documentation is comprised of information related to selection decisions for the functional records of specific agencies. This type of documentation articulates the basis upon which particular disposition decisions have been reached and results in the legal instrument governing how agencies may dispose of records no longer required for operational purposes. Due to the large volume of appraisal documentation produced by NARA, LAC, and NAA, this study focused on the examination of the first- and third-tiers of these institutions' archival appraisal architectures.

An emphasis on the development of program-level documentation to provide the intellectual foundation for appraisal activities appears to be a shared concern for NARA, LAC,

¹ This concept of an architecture of appraisal documentation is taken from Barbara Craig's discussion of the architecture of responsible appraisal in chapter six of her volume, *Archival Appraisal: Theory and Practice* (München: K. G. Saur, 2004).

and NAA. Prompting these national archival institutions to flesh out this tier of appraisal documentation are several factors. First, detailed program-level documentation is perceived to be a means by which appraisal outcomes can be improved and made more consistent. Second, each of these institutions has become more cognizant that documentation is critical in demonstrating accountability for appraisal activities and decisions in light of negative press coverage resulting in large part from public misunderstanding of this professional activity. Third, NARA, LAC, and NAA have all undertaken efforts to reengineer their appraisal programs. Rethinking their approaches to appraisal has underscored the need for a framework to guide selection activities.

At the time this research was conducted, NARA was in the process of developing its first formal appraisal policy, “Strategic Directions: Appraisal Policy.” This document, officially adopted in May 2006, outlines NARA’s legal authority for appraising government records and articulates the “framework, objectives, and guidelines that National Archives and Records Administration (NARA) uses to determine whether Federal records have archival value.”² Though the institution had long conducted appraisal on the basis of standard operating procedures, NARA recognized that a written policy could be valuable. Internally, a policy document would benefit appraisal archivists, especially employees embarking on appraisal for the first time. One archivist observed that, “A lot of training material isn’t written down, isn’t in one place. So, some people get very well trained in one aspect of [appraisal] and are less familiar with other areas....For internal purposes, the more documentation that is available, the easier it is to train our own people and the more consistent the National Archives is in making

² National Archives and Records Administration, “Strategic Directions: Appraisal Policy, (May 2006), accessed 3 November 2006, available from <http://www.archives.gov/records-mgmt/initiatives/appraisal.html>.

appraisal decisions.”³ NARA’s new appraisal policy, then, provides an intellectual rationale to supplement the standard operating procedures that outline the process which guides archivists through the appraisal exercise. Externally, the appraisal policy provides an accountability mechanism intended to raise public awareness of appraisal and the guidelines which NARA uses to make decisions regarding the permanent or temporary value of government records. The criticism which NARA received in 1997 regarding the disposal of scientific notebooks from the Naval Research Laboratory provided a major impetus to craft appraisal guidelines and make them publicly available in an effort to render NARA’s selection activities more transparent.⁴

Library and Archives Canada has made a concerted effort since it adopted a macro-appraisal strategy to produce comprehensive documentation of the appraisal process, beginning at the program-level. LAC’s program-level documentation consists of three documents which together form the highest level of its archival appraisal architecture: “Preserving the Archival and Historical Memory of Government,” which provides a rationale for appraisal and establishes LAC’s legal authority for this activity; “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part A: Concepts and Theory,” which provides the intellectual underpinnings of LAC’s appraisal strategy; and “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part B: Guidelines for Conducting an Archival Appraisal of Government Records,” which clarifies the procedures entailed in the appraisal process.⁵ In addition to the

³Respondent NARA-1, interview by author, July 29, 2003.

⁴ Respondent NARA-1, interview by author, July 29, 2003.

⁵ See National Archives of Canada, Government Records Branch, “Preserving the Archival and Historical Memory of Government,” (Approved by the National Archivist of Canada, 17 October 2001), accessed 3 November 2006, available from <http://www.collectionscanada.ca/information-management/007/007007-1042-e.html>; National Archives of Canada, Government Records Branch, “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part A: Concepts and Theory,” (Approved by the National Archivist of Canada, 17 October 2001), accessed 3 November 2006, available from <http://www.collectionscanada.ca/information-management/007/007007-1035-e.html>; and, National Archives of Canada, Government Records Branch, “Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part B, Guidelines for Conducting an Archival Appraisal of Government

rich institutional documentation that results from macro-appraisal activities, archivists at LAC have published accounts of the institution's experience with implementing and refining this approach to appraisal. These contributions to the professional literature have benefited the archival community by providing opportunities for renewed dialogue on appraisal. LAC has, therefore, taken a leadership role in discussions of archival accountability and appraisal.⁶

The National Archives of Australia's appraisal activities are also well-documented at the program-level. NAA's top layer of appraisal documentation consists of *Why Records Are Kept: Directions in Appraisal*, the policy document which articulates the institution's approach to appraisal; *The DIRKS Manual: A Strategic Approach to Managing Business Information*, into which NAA's appraisal methodology is embedded; and two reports on the whole-of-government macro-appraisal exercise and the associated public consultation, which NAA conducted

Records," (Approved by the National Archivist of Canada, 17 October 2001), accessed 3 November 2006, available from <http://www.collectionscanada.ca/information-management/007/007007-1041-e.html>.

⁶ Writings about macro-appraisal can be classified into three categories based upon the evolution of this strategy within Library and Archives Canada. For what might be considered a "first round" of writings on macro-appraisal at the then National Archives of Canada, see Richard Brown, "Macro-Appraisal Theory and the Context of the Public Records Creator," *Archivaria* 40 (Fall 1995): 121-142; Terry Cook, "'Mind Over Matter': Towards a New Theory of Archival Appraisal," in *The Archival Imagination: Essays in Honour of Hugh A. Taylor*, ed. Barbara L. Craig, 38-70 (Ottawa: Association of Canadian Archivists, 1992); Jean-Stéphan Piché, "Macro-appraisal and Duplication of Information: Federal Real Property Management Records," *Archivaria* 39 (Spring 1995): 39-50; Sheila Powell, "Archival Reappraisal: The Immigration Case Files," *Archivaria* 33 (Winter 1991-1992): 104-116; and Bruce Wilson, "Systematic Appraisal of the Records of the Government of Canada at the National Archives of Canada," *Archivaria* 38 (Fall 1994): 218-231. For the second phase of macro-appraisal articles, see Catherine Bailey, "From the Top Down: The Practice of Macro-Appraisal," *Archivaria* 43 (Spring 1997): 89-129; Brian P. N. Beaven, "Macro-Appraisal: From Theory to Practice," *Archivaria* 48 (Fall 1999): 154-198; and Richard Brown, "Back to the Strategic Roots: Appraisal Reform at the National Archives of Canada," *Archival Issues* 24:2 (1999): 113-122. The most recent articles about macro-appraisal at LAC include: Kerry Badgley and Claude Meunier, "Macroappraisal, the Next Frontier: An Approach for Appraising Large and Complex Government Institutions," *Archival Science* 5 (December 2005): 261-283; Catherine Bailey, "Turning Macro-appraisal Decisions into Archival Holdings: Crafting Function-based Terms and Conditions for the Transfer of Archival Records," *Archivaria* 61 (Spring 2006): 147-179; Brian P. N. Beaven, "'But Am I Getting My Records?': Squaring the Circle with Terms and Conditions Expressed in Relation to Function and Activity," *Archival Science* 5 (December 2005): 315-341; Margaret Dixon, "Beyond Sampling: Returning to Macroappraisal for the Selection of Case Files," *Archival Science* 5 (December 2005): 285-313; Normand Fortier, "Transparency, Compliance, and Accountability: Developing A Knowledge Infrastructure for Macroappraisal at Library and Archives Canada," *Archival Science* 5 (December 2005): 343-360; and, Candace Loewen, "Accounting for Macroappraisal at Library and Archives Canada: From Disposition to Acquisition and Accessibility," *Archival Science* 5 (December 2005): 239-259.

subsequent to this dissertation research.⁷ As the National Archives of Australia's appraisal program continues to evolve, the institution uses its website to distribute relevant documentation to government agencies and the public in order to facilitate the appraisal process and to promote transparency in its selection activities. Archivists from NAA also contribute to professional discussions of appraisal by publishing accounts of the institution's experience with functions-based appraisal and macro-appraisal.⁸

In addition to the program-level documentation that NARA, LAC, and NAA generate, each of these national archival institutions produces extensive documentation of specific disposition decisions. In all of these jurisdictions, the end product of the appraisal process is the same: a records disposal authority which provides government agencies with legal permission to dispose of the records described in the document. At NARA, the Archivist of the United States signs authorities on behalf of the institution, while in Canada, this responsibility belongs to the Librarian and Archivist of Canada. In Australia, the Director General of NAA or one of two directors to whom this task is delegated signs off on records disposal authorities. In the United States and Australia, a representative of the government agency to which this legal instrument is issued signs the document as well, assuming responsibility for the disposal of records in

⁷ See National Archives of Australia, *Why Records Are Kept: Directions in Appraisal*, "Why Keep Commonwealth Records?," (March 2000, revised 2003), accessed 3 November 2006, available from http://www.naa.gov.au/recordkeeping/disposal/why_keep/why.html; National Archives of Australia, *The DIRKS Manual: A Strategic Approach to Managing Business Information*, (September 2001; revised July 2003), accessed 3 November, 2006, available from <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>; National Archives of Australia, *Whole-of-Government Functional Analysis: The Relative Significance of Functions of the Australian Government 1975–2005*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Whole-of-government-functional-analysis.html>; and, National Archives of Australia, *Macro-appraisal: Results of Consultation*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Macro-appraisal-report.html>.

⁸ See Adrian Cunningham and Robin Oswald, "Some Functions Are More Equal Than Others: The Development of a Macroappraisal Strategy for the National Archives of Australia," *Archival Science* 5 (December 2005): 163-184; Russell Kelly, "The National Archives of Australia's New Approach to Appraisal," *Archives & Manuscripts* 29 (May 2001): 72-85; and, Anne-Marie Schwirtlich, "The Functional Approach to Appraisal – The Experience of the National Archives of Australia," *Comma* 2002.1-2: 57-62.

accordance with the agreement. In Canada, an agency official signs not the Records Disposal Authority itself, but the associated Agreement for Transfer of Archival Records between the agency and the archives. There are some key differences, however, among the records disposal authorities issued by NARA, LAC, and NAA. At NARA, these documents permit only the disposal of the particular existing records specified on the schedule and seldom provide coverage for all agency records.⁹ At LAC and NAA, which have adopted functional approaches to appraisal, records disposal authorities convey ongoing permission to dispose of the records generated by the agency functions described in the authority. Ideally, records disposal authorities issued by LAC and NAA cover the all the functions of the entire agency, or at least all of the functions of large operational units within the agency. The legal instruments which NARA and NAA issue to government agencies specify particular retention periods after which agencies may dispose of records as designated in the authority. At LAC, the complete legal package which conveys records disposal authority consists not only of the Records Disposal Authority, but of an associated Agreement for Transfer of Archival Records and a Terms and Conditions for the Transfer of Archival Records document. The terms and conditions document specifies a specific period of time within which the agency must notify the agency of how long it requires records for legal and operational purposes so that LAC can plan for the transfer of archival records at the appropriate time. Thus, it is the agency and not the archives which schedules records.

The appraisal documentation that reflects how and why particular disposition decisions reflected in records disposal authorities have been reached differs across NARA, LAC, and NAA. NARA and LAC both produce appraisal reports which provide the rationale for selection

⁹ For several years, NARA has been exploring alternative approaches to appraisal as part of its Records Management Initiative. If the institution adopts a new appraisal strategy, the scope of Records Disposal Authorities might change as a result.

decisions. At NARA, there is no standard for the production of appraisal memos; thus, the presentation of this core component of appraisal documentation varies depending on the preferences and practices of individual archivists. NARA's appraisal reports typically contain the same types of information, including a description of the agency requesting the records disposal authority and its responsibilities; a description of the records, based on the archivist's examination and conversations with agency personnel; and the appraiser's recommendations for disposition. The level of detail that is included is left to the discretion of the appraising archivist; thus, appraisal memos can range from a couple of sentences to twenty pages. The goal of the appraisal archivist is to demonstrate to anyone who reads the appraisal memo in conjunction with the Records Disposal Authority that NARA has reached a reasoned decision regarding the disposal of the records described.

Since the adoption of macro-appraisal at Library and Archives Canada, a high priority has been placed on writing archival appraisal reports that reflect the research process that resulted in selection decisions. These documents incorporate the same types of information as do NARA's appraisal memos, but go beyond that to establish the institutional context, agency functions, and the relationship of agency records to those produced by other government agencies. The goal of these Archival Appraisal Reports is to identify all agency functions and to determine if the records generated by this agency represent the best source of documentation for those functions within the Canadian government. Thus, appraisal reports give precedence to what the archivist determines to be the unique functions of an agency. Appraisal archivists present a hypothesis in these reports and must then validate that hypothesis through research using primary sources and secondary literature, interviews with agency personnel, and targeted examination of records. When an initial appraisal hypothesis is disproved, it is important for

archivists to provide an explanation of the factors that caused them to change their initial assessment. In the early years of macro-appraisal at LAC, Archival Appraisal Reports could be sixty, eighty, or a hundred pages, depending on the complexity of the functions being appraised. Since 2001, however, the institution has been working to establish baseline standards for appraisal documentation which will provide an adequate account of selection decisions, yet at the same time allow LAC's Government Records Appraisal and Disposition Program to expedite workflow. As part of this effort, the unit has adopted guidelines for archival appraisal reports which specify what information must be included in these documents and established twenty pages as a maximum limit for appraisal reports.¹⁰ This measure has resulted in the creation of standard and consistent appraisal reports which are crafted with the intention of providing an adequate account of how LAC has fulfilled its appraisal responsibilities.

Unlike the National Archives and Records Administration and Library and Archives Canada, the National Archives of Australia does not currently generate a summary appraisal document which ties together the reasons for which disposition decisions have been reached. This could be due to the fact that NAA relies on agencies to produce the documentation which leads to appraisal outcomes, whereas at NARA and LAC, archivists gather the information necessary for reaching selection decisions. The information which agencies compile, with guidance from archivists at NAA, during Steps A, B, and C of the DIRKS process, provides ample evidence to serve as the rationale for appraisal decisions. In particular, the Organizational Context Document which results from Step A, the Function Source Document produced during Step B, and the identification of recordkeeping requirements and risk analysis in Step C are vital for accountability purposes. This documentation is extensive, however, which means that

¹⁰ This document was provided to the researcher for reference purposes. National Archives of Canada, Government Records Branch, "Drafting an Appraisal Report for the Disposition of Government Records," February 2001.

someone interested understanding the logic behind specific disposition decisions needs to be sufficiently motivated to piece the rationale together. It is possible to infer why appraisal outcomes have been reached through examining NAA's program-level documentation, but gaining insight into the particulars for specific disposal recommendations is a challenge given current practices of documenting appraisal. Staff at NAA offer differing opinions about the merits of adding another component to the institution's archival appraisal architecture, in the form of having appraisal archivists write summary documents for disposition decisions, such as the reports produced by NARA and LAC. While some feel that it is incumbent on NAA to produce such an account to provide for transparency in appraisal decisions, they recognize that in the final analysis, it becomes an issue of the resources that would be required to do so. One archivist commented, "If we have to write something else to explain what it is we're doing, then we add a huge amount to the process, and for what benefit?"¹¹ Unless management perceives that not having a summary appraisal document poses a risk substantial enough to justify the additional investment of resources into drafting such reports, the Government Records Branch does not plan to change its practices for documenting disposition decisions. Despite this lack of a summary appraisal report, the combination of documentation produced by agencies and NAA comprehensively documents the appraisal process and does appear to be more than adequate to meet legal challenges or to respond to public concerns that might arise about appraisal decisions.

Availability of Appraisal Documentation

If documentation of appraisal is to serve as an instrument of accountability which renders this professional function more transparent to the public, it is imperative that archival institutions make this documentation readily available. Appraisal activities at NARA, LAC, and NAA generate an abundance of documentation. A key question for archivists to address is what

¹¹ Respondent NAA-3, interview by author, August 26, 2003.

portion of the archival record of appraisal is required to provide the public with an adequate accounting for its disposition decisions. The types of documentation produced by all three institutions studied as part of this research, ranging from program-level documentation to documentation of disposition decisions, suggest that it is important for archives to demonstrate how appraisal is conducted as well as why specific choices are made during the course of selection activities. An equally important issue to consider is what channels are most conducive to delivering essential information about appraisal to stakeholders of archives. While the World Wide Web is certainly not the only means by which to publicize the selection activities of archivists, its increasing ubiquity and emerging trends in e-government recommend it to national archival institutions as a means of promoting professional accountability in the appraisal of public records.

The Internet provides a vehicle for making archival resources more widely available than ever before, as well as for disseminating information about the activities of archivists that shape these holdings. This means of communication offers the promise of enabling archivists to achieve greater accountability for their professional functions by using institutional websites to deliver information which explains choices that archivists make in managing archival resources, beginning with selection decisions. In fact, NARA, LAC, and NAA have all chosen to make core components of program-level documentation of appraisal available via their websites. Likewise, general records schedules which apply to administrative records produced by more than one government agency are posted on the websites of all three institutions.

Online documentation of appraisal is provided for the benefit of two constituencies: the agencies which rely on the appraisal services of these national archival institutions and the public on whose behalf government archivists conduct selection. Since the success of appraisal

activities is contingent on collaboration with the government agencies which create and manage records, the websites which describe NARA, LAC, and NAA's appraisal and disposal services place a priority on the delivery of information designed to make agencies aware of legislation pertaining to the disposal of government records, explain the process of securing disposal authority for records no longer needed for operational purposes, and provide resources and tools to assist agency records management staff with facilitating appraisal activities. At the same time, this information is made available with the expectation that interested members of the public will be able to consult it in order to gain an understanding of appraisal activities.

At a minimum, it is essential for government archivists to make program-level documentation of appraisal readily available to the public. This first tier of the archival appraisal architecture serves the important functions of explaining to non-archivists what appraisal is and why it is necessary, establishing the institution's statutory authority for this function, and demonstrating that the archives conducts this activity responsibly according to policies and procedures. Program-level documentation is a means by which archivists can proactively work to dispel the mystery surrounding appraisal and the myth that the disposal of government records takes place in secrecy, as part of an effort to conceal the wrongdoings of public officials. The units charged with responsibility for appraisal at NARA, LAC, and NAA have all taken important steps in this direction by making available through their websites documentation which underscores that the appraisal and disposal of government records are activities that take place as part of the regular administration of archival institutions. The National Archives and Records Administration has posted its recently adopted high-level document online. Library and Archives Canada's website includes its three top-level appraisal documents. The National Archives of Australia likewise makes its suite of program-level appraisal documentation

available online. The three national archival institutions studied in this research have thus fulfilled a significant accountability requirement for their selection responsibilities through drafting program-level documentation which explains the appraisal process and taking the additional step of making these documents readily available to the public via their websites.

Another commonality among NARA, LAC, and NAA pertains to their delivery of a second-tier of appraisal documentation via institutional websites. This second layer of documentation consists of information about general records schedules or multi-institutional disposition authorities which govern the disposal of common administrative records produced by more than one government agency. These authorities are intended to allow agencies to efficiently dispose of the volumes of records of a routine housekeeping nature that have been appraised by the archives as temporary records having no archival value. As such records do not relate to the unique functions performed by government agencies, appraisal archivists develop disposal authorities to provide multiple agencies with the legal authorization to dispose of such records when they are no longer required by agencies for operational purposes. This streamlines the management of records by government agencies, as the process of obtaining disposal authorities from the archives covering specific records, functions, or institutions can be time-consuming. All three archives provide these general records disposal authorities online, along with instructions to agencies regarding their scope and intended application.¹²

Access to documentation associated with specific disposition decisions varies among NARA, LAC, and NAA. Records disposal authorities, which reflect the outcome of particular

¹² NARA's general records schedules are available at <http://www.archives.gov/records-mgmt/ardor/>, accessed 3 November 2006. LAC's Multi-Institutional Disposal Authorities (MIDAs) are accessible from <http://www.collectionscanada.ca/information-management/007/007007-1008-e.html>, accessed 3 November 2006. NAA's general disposal authorities issued by NAA are available at <http://www.naa.gov.au/recordkeeping/disposal/authorities/GDA/summary.html>, accessed 3 November 2006.

appraisals but which do not provide a detailed rationale of why these decisions are reached, are publicly available documents in all three jurisdictions. Obtaining documentation which explains the appraisal decisions reflected in records disposal authorities, something which is a prerequisite to achieving full accountability, represents more of a challenge. This is in part due to legislation governing public access to the operational records produced by the archival institutions and the agencies which create documentation related to appraisal decisions and in part due to practices established between the archival institutions and the agencies as part of their collaborative relationship in the appraisal process.

In the United States, full documentation of the appraisal decision-making process, as reflected in the job dossiers described in Chapter Four, is considered a public record to which open access is granted to any interested party. These documents are appraised as permanent records, ultimately becoming part of the National Archives and Records Administration's Record Group 64, which contains the agency's administrative records, including those documenting selection. Records that have not yet been transferred to Record Group 64 can be requested through a freedom of information request. In Canada, the appraisal reports which provide a record of the appraisal decision-making process – as operational records of Library and Archives Canada – fall under one of the categories of government records that are subject to review prior to being released, in accordance with provisions included in the Access to Information Act and the Privacy Act.¹³ Finally, in Australia, access to full documentation of the appraisal process can only be obtained with the permission of the agency whose records are the subject of appraisal. This is because the agencies, rather than the archives, produce much of the documentation that is

¹³ For a listing of the categories of government records subject to this review process and instructions for filing a petition for review, see "Records of the Government of Canada: Access to Information and Privacy – More Details," Library and Archives Canada (29 March 2003), accessed 3 November 2006, available from <http://www.collectionscanada.ca/services/005-6011-e.html>.

used as the basis for the disposal actions which NAA approves in the resulting Records Disposal Authorities.

While access to the full range of documentation related to particular disposition decisions is more restricted in Australia than it is in the United States and Canada, Records Disposal Authorities issued by NAA are at present the most readily accessible documentation reflecting the outcome of appraisal. Since the time this research was conducted, NAA has followed through with its intention to provide online access to the functions-based Records Disposal Authorities which it has approved since the implementation of the institution's new appraisal methodology in 2001.¹⁴ NARA and LAC currently do not provide access to records disposal authorities through their websites, although these documents are available to the public.

Library and Archives Canada is in the process of making comprehensive documentation of appraisal decisions available online through the Records Disposition Authorities Control System (RDACS), the database which the institution uses internally to capture information related to all appraisals conducted by LAC.¹⁵ RDACS is an invaluable resource to appraisal archivists, as it allows them to take a longitudinal view of the disposal of federal records by incorporating all Records Disposal Authorities issued since 1936. In addition, for appraisals conducted since the institution's adoption of a macro-appraisal strategy, RDACS contains detailed Archival Appraisal Reports which reflect the reasons behind disposition recommendations. This comprehensive view of appraisal activities at LAC is an invaluable tool which archivists rely on to inform appraisals that they are conducting. Since the time this

¹⁴ These functions-based Records Disposal Authorities are available at <http://www.naa.gov.au/recordkeeping/disposal/authorities/RDA.html>, accessed 3 November 2006. This webpage advises interested parties to contact the Government Records Branch for additional authorities issued for non-functions based appraisals.

¹⁵ For a complete description of RDACS, see Normand Fortier, "Transparency, Compliance, and Accountability: Developing a Knowledge Infrastructure for Macroappraisal at Library and Archives Canada," *Archival Science* 5 (December 2005): 343-360.

research was conducted, LAC has made portions of RDACS available to government agencies to assist them in managing their information. LAC's website indicates that it is proceeding with plans to make portions of RDACS available to the public, including summaries of records disposal authorities and archival appraisal reports.¹⁶ This tool is intended to assist the public in understanding what the institution has and does not have in its archival collections. Through contextualizing appraisal decisions in terms of government functions and providing access to records disposition authorities, LAC aims to assist the public in locating records which might be held in government departments rather than in its archival holdings. Most significantly, though, providing public access to this resource will provide the public with an accounting of LAC's disposition decisions.

Opportunity for Public Input

Archivists with responsibility for appraisal at NARA, LAC, and NAA recognize that there are many constituencies with a stake in the outcome of archival selection activities. At all three institutions, archivists have developed informal mechanisms for seeking feedback during the appraisal process from relevant stakeholders (e.g., historians, scientists, subject specialists, and genealogists). Traditionally, this strategy has been the exception rather than the rule, and has been utilized when records which are perceived to be of special interest to a particular group of users or likely to generate a controversy are being appraised. Routine efforts to solicit public input into the appraisal process, however, appear to be tied to legal mandates, as at the National Archives and Records Administration in the United States, or institutional policy initiatives, as in the case of the National Archives of Australia. Library and Archives Canada, though it places a

¹⁶ See <http://www.collectionscanada.ca/information-management/007/index-e.html>, accessed 3 November 2006.

heavy emphasis on ensuring transparency in appraisal, has neither a legal nor a policy imperative to solicit public input into the selection process.

Among the institutions studied as part of this dissertation, NARA is the only one with a legal mandate to provide the public with an opportunity for input into the appraisal process. The Federal Records Act of 1950 requires that interested parties be offered the opportunity to provide comments on proposed records schedules. This legislation states that the Archivist of the United States is empowered to authorize agencies to dispose of records which lack administrative, legal, or research value to warrant continued preservation “after publication of notice in the *Federal Register* and an opportunity for interested persons to submit comment thereon[.]”¹⁷ In accordance with this requirement, notices of pending disposition authorities are published for public comment. These announcements are required for most proposed records schedules. Notices do not have to be posted in the *Federal Register* for a schedule which “contains only permanent items, increases the retention period of series already approved for disposal, and/or authorizes the disposal of paper copies of records that have been microfilmed.”¹⁸

The public has forty-five days from the date of publication in the *Federal Register* to request a proposed schedule. NARA sends a copy of a schedule to any individual who requests it, along with the appraisal memo in the majority of cases.¹⁹ Requestors are advised that they have thirty days from the date on which NARA sends them the schedule to submit comments on it. Whenever comments are received, NARA is required to respond to them. Sometimes the comments received as a result of the *Federal Register* process result in another appraisal of the

¹⁷ 44 United States Code, Chapter 33, §3303a.

¹⁸ See NWML *Standard Operating Procedures* (1999), Chapter 1: Appraisal and Disposition. Section 3 describes the process of preparing notices of proposed records schedules for publication in the *Federal Register* and responding to requests for schedules and comments from the public.

¹⁹ In cases where the records covered by the proposed schedule are of a sensitive nature, NARA has the discretion to withhold the appraisal memo, though since the mid-1990s, it has been a requirement that the schedule itself must be provided even for classified records. Respondent NARA-3, interview by author, July 30, 2003.

records. The outcome of this reassessment exercise may result in NARA standing by its disposition recommendations or reversing or making modifications to its initial recommendation. Appraisal archivists at NARA realize that the publication of notices of proposed records schedules in the *Federal Register* is intended to serve as a safeguard in the appraisal exercise. At the same time, they sometimes face tensions with agencies which view the process simply as a delay in getting a records schedule approved.

The appraisal archivists interviewed as part of this research concur that it is rare for copies of a records schedule to be requested as a result of the *Federal Register* process. Their experience has been that it is still less common for NARA to receive comments about the proposed schedule after it has provided these documents to a requestor. The majority of requests and comments tend to come from two or three individuals who represent public interest groups or who have specific research areas. This raises the question of whether the *Federal Register* offers an adequate mechanism for the type of public comment into the appraisal process that Congress envisioned when it enacted the Federal Records Act of 1950. The consensus among the seven archivists interviewed at NARA is that the *Federal Register* process does provide a suitable method of providing the public with an opportunity for input into appraisal decisions. In large part, this is based on the archivists' perception that the public at large is simply not interested in appraisal. One interviewee stated that the very small portion of the public which is concerned about NARA's disposition decisions tends to be aware of the *Federal Register* notices regarding proposed records schedules.²⁰ Another archivist noted that NARA's efforts to go beyond the *Federal Register* process to engage the public in appraisal discussions have been unsuccessful. This respondent reflected:

²⁰ Respondent NARA-3, interview by author, July 30, 2003.

The times we have tried to get active interest or involvement have been pretty disappointing in their results. There are a handful of things that do get the public interested, things of interest to the genealogical community. I mean, that's a very specialized portion of the public and certainly if we were appraising a major genealogical series as temporary, we would seek out input from the genealogical community. There may be other instances where we think something is really of potential consequence or significance where we have gone out and actively elicited some type of public review or input, usually by going to organizations such as the Organization of American Historians and relying on them to get the word out. But, for most schedules, there just isn't the interest.²¹

The underutilized *Federal Register* process and unsuccessful attempts to solicit input into appraisal exercises in the past have combined to lead some archivists at NARA to conclude that there is little benefit to be gained from taking more active measures to involve the public in the appraisal process.

At the National Archives of Australia, there is no legal requirement under the *Archives Act 1983* for the institution to consult with stakeholders during the appraisal process.

Community consultation, however, has been adopted as part of an organizational policy initiative. This approach is consistent with AS ISO 15489 – 2002, the standard for recordkeeping which the institution has adopted. This standard prescribes that appraisal decisions must take into account business needs, accountability obligations, and the expectations of internal and external stakeholders. In keeping with the priority placed on meeting the needs of various constituencies in making disposition decisions, NAA began serious experiments in community consultation as it reengineered its appraisal strategy.

NAA's initial effort to involve the public in the appraisal exercise as it reconsidered its disposition program was to solicit comment on the institution's high-level policy document, *Why*

²¹ Respondent NARA-2, interview by author, July 30, 2003.

*Records Are Kept: Directions in Appraisal.*²² This was followed by the development of a framework for consultation between NAA and the Australian Historians Association (AHA) in 2001. These early experiments in community consultation taught NAA some valuable lessons regarding the prerequisites to successful dialogue with external stakeholders. The institution learned that it would take time to lay the groundwork for productive community consultation. Since appraisal has traditionally been conducted behind closed doors, archivists cannot assume that this process is intuitive to the public. The documentation which NAA generates during the appraisal process can be difficult for non-archivists to comprehend. One archivist described NAA's documentation as "opaque," noting the need to for the institution to generate summary appraisal reports in plain English. This interviewee continued, "If we learned one thing from the AHA exercise, it's that we can't possibly hope to succeed with community consultation if we don't produce our appraisal documentation in digestible form. If we don't do this, we're going to waste time in talking at cross-purposes with people or trying to put to rest misconceptions because people understandably can't make sense of the stuff they're being shown."²³

Community consultation is also an exercise which requires a significant investment of institutional resources to be done well. Inviting the community to participate in dialogue about appraisal creates certain expectations among those who participate in the process, and it is essential for the institution to be prepared to commit the time and resources necessary to develop and implement a framework for meaningful consultation. One archivist noted, "If you're going to bother to do it, you've got to do it well, because to do it badly is worse than not doing it at all. If you're not going to do it properly, then don't do it at all. Otherwise, you're going to create all

²² See National Archives of Australia, *Why Records Are Kept: Directions in Appraisal* (March 2000, revised 2003), accessed 3 November 2006, available from http://www.naa.gov.au/recordkeeping/disposal/why_keep/summary.html. This policy document is discussed in Chapter 6 of this dissertation.

²³ Respondent NAA-2, interview by author, August 26, 2003.

sorts of expectations and disillusion a whole lot of people.”²⁴ The institution has to assess the impact that committing to community consultation may have on other aspects of its disposition program. Investing the time and resources necessary to support community consultation into this process may result in implications for internal stakeholders, such as the government agencies which are NAA’s primary clientele. The chief interest of Commonwealth departments is in having disposition authorities approved expeditiously. This is already a lengthy process, and NAA has to be realistic about the tensions that adding a layer of community consultation into appraisal deliberations may create among NAA and agencies. Among the perceived benefits of community consultation at NAA is the perception that soliciting input from external stakeholders into the appraisal process will ultimately improve the quality of the country’s archival holdings, while at the same time making the institution’s selection activities more responsible and understandable to the public. Stated one interviewee, “If it’s done well it should lead to better appraisal outcomes. It makes our processes more accountable and transparent, and in fact as a risk-management exercise I think it’s important.”²⁵

At the time this study was being conducted, NAA had begun to explore other models for soliciting feedback into its appraisal activities. Since 2003, NAA’s community consultation efforts have been linked to the development of a macro-appraisal framework to guide the institution’s implementation of functional appraisal. The goal of this exercise is to locate the best archival record by identifying the most important government functions and the agencies which produce records that document those functions. In order to develop a meaningful context in which to consult with stakeholders in the development of this model, the institution first identified functions performed by government institutions, independent of the agencies which

²⁴ Respondent NAA-2, interview by author, August 26, 2003.

²⁵ Respondent NAA-2, interview by author, August 26, 2003.

produced them. This analysis yielded 25 top-level functions and 272 second-level functions which fall under one of the top-level functions. NAA then prioritized these functions based on nine indicators of significance in order to assess their relative importance to government and to the Australian public. Based on this analysis, NAA assigned each function a ranking ranging from one (highest significance) to 6 (lowest relative significance).²⁶ At this point, NAA began the process of consulting with internal and external stakeholders in order to factor their views into the emerging model.

The National Archives approached four groups of stakeholders for feedback on its macro-appraisal of government functions. NAA requested that staff of Australian government agencies, community stakeholders (including historians and genealogists), archives and records professionals, and NAA staff evaluate the functional analysis and suggest additional indicators of significance that NAA might consider factoring into its prioritization of government functions.²⁷ NAA used meetings and discussions with agency staff and community stakeholders, presentations at professional and NAA meetings, publications, and postings to professional listservs to communicate with stakeholders during the course of the consultation process, ultimately receiving a wide range of input about its functional analysis. A major concern which stakeholders expressed during consultation was that the model that NAA had developed would favor the records produced by large, high-level government agencies, to the exclusion of important documentation created by smaller agencies. These worries challenged NAA to

²⁶ See NAA's report on this project, as well as a published account of this macro-appraisal exercise: National Archives of Australia, *Whole-of-Government Functional Analysis: The Relative Significance of Functions of the Australian Government 1975–2005*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/whole-of-government-functional-analysis.html> and Adrian Cunningham and Robin Oswald, "Some Functions Are More Equal Than Others: The Development of a Macroappraisal Strategy for the National Archives of Australia," *Archival Science* 5 (December 2005).

²⁷ For a report on the consultation process, see National Archives of Australia, *Macro-appraisal: Results of Consultation*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Macro-appraisal-report.html>.

articulate to its stakeholders that, “the macro-appraisal framework is meant to be a tool that will inform decisions made in individual appraisal projects, not an overriding and inflexible juggernaut.”²⁸ As a result of perceptions that the designation “macro-appraisal” implied a rigid model, NAA changed the name of this framework, which it intends to use as an evolving model, to “whole-of-government functional analysis.” NAA found this consultation exercise valuable, but acknowledges that the process is difficult, not least because stakeholders often do not understand the documentation which they have been asked to evaluate, which utilizes terminology that is not familiar to those outside the recordkeeping community. Additionally, NAA’s report on this community consultation exercise notes:

During the consultation process, some stakeholders were unable to accept that the National Archives can only know what is important today and in the past, and that we cannot predict what might be considered important in the future. This made it more difficult to consult with some stakeholders. However, this process is an important part of a necessary ongoing dialogue between the Archives and Australian citizens about the difficult and important appraisal decisions the Archives is required to make under the terms of its legislation.²⁹

NAA’s experience in consulting with the public in the development of its evolving framework for functional analysis highlights that the appraisal documentation which archivists produce is not always comprehensible to non-archivists. If the profession is to be fully accountable for its selection activities, it is necessary to evaluate the level of transparency into the appraisal process that is provided by current practices for documenting this function to identify problematic aspects of the archival record of appraisal.

This study does not contend that archivists must provide mechanisms for public input into the appraisal process in order ensure accountability for this professional function.

²⁸ National Archives of Australia, *Macro-appraisal: Results of Consultation*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Macro-appraisal-report.html>, page 9.

²⁹ National Archives of Australia, *Macro-appraisal: Results of Consultation*, (2006), accessed 3 November 2006, available from <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Macro-appraisal-report.html>, page 8.

Accountability for appraisal relates to the ability of archivists to explain what appraisal is, how it is conducted, and why particular appraisal decisions are reached. It entails producing documentation that reflects that appraisal decisions have been arrived at in accordance with relevant legislation, institutional policies and procedures, professional best practice, and with due consideration of the cultural and historical value of records. This research proposes, however, that incorporating opportunities for public feedback into the appraisal process can contribute to greater accountability in appraisal and might ultimately result in the creation of a richer documentary record by bringing a diversity of perspectives to selection activities. Soliciting effective input into appraisal decisions from the public challenges archivists to take a close look at appraisal practices and to render selection decisions into language that is meaningful to non-archivists. Such exercises serve as reminders that archivists are society's delegates in the appraisal function, and as such are ultimately accountable to the public for the appraisal decisions which they make. If archives provide mechanisms for public input into the appraisal process, the feedback received – and how it was factored into an ultimate appraisal decision – must be incorporated into the institution's archival appraisal architecture.

Summary

This chapter has addressed the research question: What constitutes documentation of appraisal that is adequate to permit archivists to be held accountable for appraisal of public records? A comparative analysis of practices for documenting appraisal at the National Archives and Records Administration in the United States, Library and Archives Canada, and the National Archives of Australia suggests that in order to provide for accountability in selection activities, archivists must document this professional function at multiple levels, make this documentation readily accessible to the public, and incorporate public feedback into the appraisal process as

mandated by legislation and institutional policy. A comprehensive record of appraisal begins at the program-level, with documents that establish the institution's statutory authority for this activity, articulate the objectives of the organization's appraisal program, outline the criteria used in identifying archival records, and explain the process by which disposal decisions are reached. This top-tier documentation which provides the justification and intellectual framework for archival appraisal must be supplemented with documentation that contains the rationale behind specific disposal decisions. To serve the purposes of demonstrating that archivists have appraised government records responsibly, it is not sufficient for archival institutions to simply generate appraisal documentation. Rather, archivists must become proactive in making these accounts of appraisal readily available to the public. Finally, public input into the appraisal process, when it is mandated by law or prescribed by institutional policy, must be factored into selection decisions and reflected in documentation of appraisal. Engaging the public in appraisal activities challenges archivists to assess the clarity of their practices for documenting appraisal, as effective participation in this process is contingent on the ability of the public to understand the information which archivists provide them.

The appraisal documentation generated by NARA, LAC, and NAA is adequate to allow archivists at these organizations to be held accountable for this professional function, in the sense of explaining how and why appraisal choices were reached. In all three institutions, however, reexamining documentation of appraisal to see how it could be improved so as to render the selection process and disposition decisions more open and transparent to stakeholders of archives would be a useful exercise to improve professional accountability in appraisal. This could no doubt be said about the documentation of appraisal at all archival institutions. The next chapter offers general guidelines against which archivists can assess their institutions' documentation to

ensure that it meets baseline standards for demonstrating accountability for this paramount professional activity. It also suggests remaining research needs related to accountability in archival appraisal which emerged from this study.

CHAPTER EIGHT

GUIDELINES FOR ACCOUNTABLE APPRAISAL DOCUMENTATION AND FUTURE RESEARCH DIRECTIONS

The preceding chapter began an exploration of the second question that this research addresses: What constitutes documentation of appraisal that is adequate to permit archivists to be held accountable for appraisal of public records? This chapter builds upon the comparative analysis of practices for documenting appraisal at the National Archives and Records Administration (NARA), Library and Archives Canada (LAC), and the National Archives of Australia (NAA) to continue that discussion by suggesting preliminary guidelines for accountable appraisal documentation in public archival institutions. The dissertation concludes by postulating future research essential to a full examination of the complex relationships between archival appraisal and accountability.

Guidelines for Accountable Appraisal Documentation

The chief premise behind this research is that documentation of appraisal is critical to enabling archivists to demonstrate accountability for disposition decisions. This is an obligation that the profession owes to society, which has delegated responsibility for the appraisal function to archivists. In order to maintain this public trust and to be fully accountable for this important activity, archivists must create, maintain, and provide access to documentation of how the appraisal process is carried out and why particular disposition decisions are reached. This accounting is essential for promoting openness and transparency in appraisal. Since little research explores the connections between appraisal and accountability and even fewer studies examine the role of documentation as an instrument that facilitates accountability in appraisal, one goal of this dissertation was the development of guidelines for accountable appraisal documentation which would serve as a baseline for future research in these areas. At the outset

of this study, the researcher intended to circulate the recommendations that emerged from the content analysis and interviews to archivists at the three host institutions for criticism. Due to the extensive amount of data gathered during the content analysis and interviews, the length of time involved in data analysis, and the realization that the study of appraisal documentation extends well beyond the scope of a single dissertation, the initial strategy was altered to exclude this feedback phase, which can be constructively pursued in future research.

Before presenting guidelines for accountable appraisal documentation, it is important to reiterate that the question of whether documentation adequately accounts for the process of appraisal and specific disposition decisions is distinct from assessments of the “rightness” or “wrongness” of any particular appraisal strategy or disposition decision. The archival profession has developed multiple strategies to guide the appraisal endeavor, and there is no universally accepted approach to this function. This study underscores that archivists recognize the complexity and subjectivity entailed in disposition decisions and find that a legitimate case can be made for a different outcome in many situations. Institutions adopt approaches to selection decision-making that reflect organizational mandates, missions, and the philosophies and objectives of their appraisal programs. Accountability is not tied to a specific strategy for this professional function. For these reasons, it is neither possible nor desirable to develop a single template or prototype for the documentation of the appraisal function.

The role of appraisal documentation is to provide an explanation which renders the appraisal process and particular selection decisions open and transparent by providing an intellectual framework for appraisal activities and articulating the rationale behind particular disposition decisions. Accountable appraisal documentation demonstrates that archivists have weighed relevant legislation, institutional policies and procedures, professional best practice, and

the interests of society during the appraisal decision-making process. It is a safeguard which ensures that the disposition of records occurs according to relevant legislation and standard procedures and provides evidence that appraisal decisions are carefully reasoned professional judgments and not arbitrary and capricious choices. In order to achieve an accountable record of the appraisal function, an archival institution should work to ensure that its appraisal business process generates adequate documentation to establish the basis upon which this activity is conducted, to provide a rationale that articulates the organization's appraisal methodology, and to explain the logic behind selection decisions.

The three national archival institutions studied as part of this dissertation research have differing strategies for fulfilling their legally mandated appraisal responsibilities. Each of these organizations creates documentation which accounts for its appraisal activities. A comparison of the documentation produced by the host institutions and the attitudes expressed by archivists responsible for conducting appraisal at NARA, LAC, and NAA suggests that it is possible to arrive at some general recommendations about what constitutes documentation of appraisal that is adequate to permit archivists to demonstrate accountability for this core professional function.

General Requirements for Accountability in Appraisal Documentation

1. Appraisal should be documented at multiple levels: Chapter Seven of this dissertation describes an archival appraisal architecture consisting of three tiers required to provide a comprehensive accounting of selection activities in national archives. In order to provide a complete explanation for its conduct of appraisal, an institution should develop program-level documentation which explains this function, establishes the legal mandate and professional rationale for appraisal, and articulates the intellectual framework within which the institution conducts its selection activities. This first level of appraisal documentation

should be supplemented by a second layer of documentation of disposition decisions for common administrative records generated by multiple government agencies and a third tier of documentation for disposition decisions related to the operational records of individual agencies. These second and third levels of documentation provide a justification for why specific choices were made regarding disposition and convey the legal authorization required by agencies to dispose of government records.

2. Documentation of appraisal should evolve with changing appraisal practices: The modifications to the appraisal business process that were underway at NARA, LAC, and NAA at the time of this study emphasized that accountable documentation of appraisal cannot be static. As institutions reengineer selection practices or make changes to how appraisal methodologies are implemented, they must create or refine documentation at all levels of the archival appraisal architecture in order to provide an accountable record of selection activities. Thus, appraisal documentation presents a moving target for research.
3. Appraisal should be documented at a level that the institution can sustain: Documentation supports the appraisal business process within archival organizations. It serves as an instrument of accountability that demonstrates that archivists have fulfilled this professional function responsibly. Archivists at NARA, LAC, and NAA recognize that the level of documentation produced as an institutional record of disposition activities is a resource issue that is driven primarily by the preferences of management. Creating insufficient documentation of appraisal activities risks the ability of archivists to account for this function. Generating more documentation than is necessary leads to inefficiencies within appraisal programs, which in turn can result in tensions with the agencies which rely on the archives for disposal authorization. These realities challenge archivists to identify a sustainable level

of appraisal documentation that factors in available resources, the preferences of management, the needs of government agencies, and accountability requirements.

4. Appraisal documentation should serve the needs of all stakeholders in archives: Appraisal documentation has long been a tool used internally within archives to serve as evidence of selection activities and to provide legal authorization to agencies for the disposal of government records. As documentation both results from and supports the appraisal business process, archivists within the institution may be the primary stakeholders in this record of selection activities. This research suggests, however, that there are other groups of stakeholders in archives which stand to benefit from accountable documentation of appraisal. Appraisal reports may provide government agencies with information that would allow them to improve their recordkeeping practices. Users of archives could rely on this documentation to better understand the collections with which they conduct research. Society at large would benefit from documentation of appraisal which provides evidence that appraisal has been conducted responsibly. Archivists in other institutions could consult appraisal documentation to inform their own selection decisions. In documenting the appraisal function and disposition decisions, archivists should consider the value that this record holds for all those with a stake in archives.
5. Documentation of appraisal should be understandable: If appraisal documentation is to be useful to those outside the recordkeeping professions, archivists should assess how understandable their record of the selection process and disposition decisions is to non-archivists. As this documentation has traditionally been generated to serve the needs of archival institutions, the professional terminology employed by archivists in writing about appraisal may not be sufficiently clear for the purposes of rendering the appraisal process and

disposition decisions open and transparent to the average reader. Archivists should work to produce appraisal documentation that is written clearly in language that is accessible to the layperson. Definitions of professional terms should be provided as a part of an institution's archival appraisal architecture.

6. Documentation of appraisal should be readily available: If archival institutions are to become fully accountable for their foremost professional function, they must not only create and maintain adequate documentation of the appraisal process and disposition decisions, but should be proactive in providing ready access to that documentation as well. Archivists should work towards a consensus of what portion of documentation is required to demonstrate accountability for selection. They should then actively promote access to this core documentation so that it reaches various groups with an interest in archives.

Accountability Requirements for Appraisal Documentation

The first chapter of this dissertation suggests that in order for documentation to be adequate for the purposes of allowing government archivists to account for their appraisal activities, it should address multiple accountability requirements. This research proposes that comprehensive documentation of the selection responsibilities of national archival institutions should reflect that the following accountabilities have been evaluated in reaching disposition decisions:

- Legal accountability, which includes relevant laws and statutes related to disposal;
- Institutional accountability, which includes the organization's policies, procedures, strategies, and frameworks for appraisal;
- Professional accountability, which includes professional practice for appraisal and ethical standards regarding the conduct of this activity; and,
- Cultural and historical accountability, which considers the importance of archival resources to a society's collective memory.

Although the National Archives and Records Administration, Library and Archives Canada, and the National Archives of Australia approach appraisal differently, this study found that the

documentation generated by these three institutions reflects all four types of accountability. On the whole, legal and institutional accountability predominate and are explicit in the appraisal documentation of NARA, LAC, and NAA. Professional accountability, while clearly evident in the keeping of appraisal documentation, proved a nebulous concept to flesh out.

Cultural/historical accountability features significantly in the appraisal documentation of these institutions, but is less well defined.

Legal Accountability

In national archival institutions which have been granted statutory authority for the appraisal and disposal of public records, the foremost accountability requirement is to establish the legal mandate for these functions. At the broadest level, the legislation that confers these powers on the archival institution can be considered part of the accountability architecture for the selection of government records. It is important for archival institutions to develop appraisal documentation that clarifies the legal basis upon which this activity is conducted. This is necessary for the purposes of accountability because the legislative mandate for the appraisal of public records is fundamental to explaining why the institution undertakes this function. Emphasizing that legislation requires that archivists make choices regarding the preservation of records as well as their disposal legitimizes the destruction of records as a routine part of government administration. The appraisal documentation produced by NARA, LAC, and NAA provides ample evidence of the institutions' legal accountability for appraisal. Program-level documentation, particularly policy documents and general information about appraisal provided on institutional websites, clearly establishes the archives' charge for the selection of records of archival value. At the level of specific disposition decisions, whether for common administrative records generated by multiple agencies or for the functional records of an individual agency,

records disposal authorities indicate the legal authority upon the basis of which permission to dispose of records is granted.

At each of the three national archival institutions studied as part of this research, the archivists who were interviewed made frequent references to the legal mandate which charged the institution with responsibility for the appraisal of government records. The statutory authority which has been granted to NARA, LAC, and NAA for identifying records that possess continuing value for preservation as national archives establishes a positive legal requirement for these institutions to conduct selection activities, providing the justification for the appraisal of public records. The primary accountability of NARA, LAC, and NAA in appraisal is thus a legal one. Accountability for appraisal, though, cannot be understood solely in terms of this legal accountability. The legislative mandates of NARA, LAC, and NAA, through assigning responsibility for the selection of records of archival value to the Archivist of the United States, the Librarian and Archivist of Canada, and the Director-General of NAA respectively, task these institutions with the appraisal of public records. Since these legal charges do not prescribe how the selection function is to be performed, it is incumbent upon each organization to develop a business process to support disposition activities. This creates institutional accountability requirements for appraisal.

Institutional Accountability

Institutional accountability requirements for appraisal are closely connected to the legal accountability for this function, because developing a methodology to guide selection activities is a prerequisite to operationalizing the underlying legal accountability to conduct appraisal. NARA, LAC, and NAA have all developed appraisal documentation which demonstrates the link between legal and institutional accountability for the appraisal function. The policies and

procedures which these institutions have adopted to support the appraisal business process provide the standards or benchmarks against which particular disposition decisions can be assessed.

The interviews conducted with archivists at NARA, LAC, and NAA indicate that responsibility to their employing institution is perceived to be an immediate accountability requirement. The appraisal recommendations that archivists convey to higher levels of management and ultimately up the chain-of-command to the Archivist of the United States, the Librarian and Archivist of Canada, or the Director-General of NAA are intended to provide adequate evidence that the proposed disposal actions are reasonable conclusions arrived at through the application of institutional criteria and procedures governing appraisal decisions. The standard for appraisal documentation, in the form of appraisal reports at NARA and LAC and in the form of the documents resulting from DIRKS Steps A, B, and C at NAA is to provide the authorized individual with sufficient information to be comfortable with signing a Records Disposal Authority which identifies records of archival value for eventual transfer to the archives and provides the legal authorization to dispose of records no longer required for operational purposes.

Appraisal archivists at NARA, LAC, and NAA feel a responsibility to their colleagues – present and future – to produce documentation of appraisal that adequately reflects how and why specific disposition decisions have been reached. At NARA and LAC in particular, current practices for recording appraisal choices in summary reports have emerged from perceived inadequacies in past methods of documenting selection decisions at a minimal level. There is a sense that more complete documentation of appraisal activities allows archivists to make more consistent and informed disposal recommendations. Archivists rely on the appraisal reports

prepared by their colleagues to learn about how their institutions have conducted appraisal over time and to understand past selection decisions that might impact current appraisal projects. Archivists at both institutions exercise a great deal of care in presenting their rationale for disposition decisions because they recognize that the appraisal reports which they write become valuable tools for their colleagues. This emphasis on producing quality appraisal reports that meet the needs of colleagues within the organization provides further evidence of attention to institutional accountability requirements in the documentation of this core professional function.

Professional Accountability

Examination of appraisal documentation and interviews with archivists at NARA, LAC, and NAA suggest that documentation of appraisal serves professional accountability requirements as well as legal and institutional responsibilities. Appraisal is recognized at all three institutions as a critical responsibility shared by the archival community, and disposal recommendations are the result of carefully reasoned professional judgments arrived at in accordance with legal mandates and institutional policies and procedures. Selection decisions also reflect an awareness of appraisal practice as articulated in the professional literature and due consideration of the interests of government agencies, users of archives, and society as a whole in the records that are the subject of appraisal. This sense of professional accountability for appraisal can be clearly seen in the contributions of NARA, LAC, and NAA, as discussed in Chapters Four, Five, and Six of this dissertation, to the literature which shapes the archival community's understanding of this foremost professional function. Archivists at national archival institutions have played an ongoing role in the continuing dialogue about selection strategies. Writings that explain this function and describe the implementation of selection

activities at specific institutions can be considered to be another layer of appraisal documentation which fulfills professional accountability requirements.

Cultural/Historical Accountability

Documentation of appraisal at NARA, LAC, and NAA indicates that selection activities at these institutions, while grounded in legal mandates and institutional policies and procedures, ultimately serve a higher level of accountability. Archivists identify and preserve records on behalf of society as a whole, privileging records which they judge to possess ongoing value for historical purposes. This can be expressed as a cultural/historical accountability requirement, which reflects the awareness that appraisal decisions have important implications for the collective memory of a nation. Program-level documentation at all three institutions studied as part of this research expresses that a fundamental goal of the appraisal exercise is to select for transfer to the national archives that portion of the records produced by government agencies which has continuing value for the purposes of national heritage. In accordance with this objective, these institutions have established high-level tools to help appraisal archivists assess the relative value of records or of the functions that produce historically significant records. NARA has released a policy document which outlines the criteria against which it appraises records. LAC has developed a government-wide plan that enables it to target its macro-appraisal efforts at those agencies which are predicted to produce the best documentation of the governance function in Canada. Most recently, NAA has conducted a whole-of-government functional analysis designed to rank the functions of government by the perceived importance of those activities for the purposes of documenting Australian society. Documentation of specific disposition decisions, particularly the summary appraisal reports produced by NARA and LAC,

likewise highlights the importance of records appraised as having archival value for cultural and historical purposes.

Future Research Directions

The findings of this study make clear that much research remains to be done to advance the profession's understanding of the areas of appraisal and accountability. Ongoing inquiry is needed to ascertain what it means for archivists to be accountable for appraisal, to measure accountability in appraisal, and to improve accountability for this professional function. While not all of these research needs focus on the documentation of archival appraisal, producing quality documentation of this function remains essential in establishing accountability for selection activities. Thus, this section emphasizes research areas related to appraisal documentation that have emerged from this research.

The accounts of appraisal documentation provided in Chapters Four, Five, and Six of this dissertation and the preceding guidelines for accountable appraisal documentation were derived from an examination of the appraisal documentation produced by large and complex national archival institutions. These three institutions' practices for documenting appraisal may not be representative of how appraisal is documented in other archival institutions. Since public archives have heightened accountability requirements because of their legal mandate for appraisal, it is possible that there are most likely to be parallels with practices for documenting appraisal in government archives at the state and local levels, but similar studies would need to be conducted in these institutional settings in order to verify if and to what extent that is the case. Such research would serve as the basis for expanding on the guidelines for accountable appraisal documentation generated during the course of this study by developing a broader understanding of professional practices for documenting appraisal in public archives.

Studies of practices for documenting the appraisal function are needed not just in government archives, but in all types of archival institutions. Discussions with colleagues and anecdotal evidence suggest that appraisal is not an activity that is well documented in many archival institutions, so it seems probable that the archival appraisal architecture for accountability is underdeveloped profession-wide. If true, this is a situation that the profession as a whole must address if it is to work towards greater accountability for appraisal. Assessing prevailing standards for documenting selection activities and disposition decisions would serve to highlight the importance of creating a record that reflects how archivists have discharged their appraisal function by generating dialogue about what it means to be accountable for selection and the role that documentation plays in the demonstration of professional responsibility.

In order to validate the suggestions for accountable appraisal documentation offered as a result of this study, it would be critical to provide archivists in all types of institutions opportunities to offer criticism and feedback on these guidelines. This would permit the modifications necessary to establishing a set of guiding principles for accountable appraisal documentation. Like the record of appraisal itself, any recommendations regarding accountability in appraisal documentation must continue to evolve to accommodate changes in professional best practice and to incorporate knowledge gained as archivists develop new understandings about appraisal and accountability. Such guidelines are important because they offer benchmarks against which archivists can measure accountability in appraisal.

A significant research need which emerged from this study relates to how comprehensible the appraisal documentation generated by national archival institutions is to non-archivists. To be fully accountable for appraisal activities, archivists must recognize that there are multiple audiences for documentation of this function. In terms of national archives, there

are at least four constituencies with a potential interest in appraisal documentation: the institution itself, including archivists in other units and those who will work in the organization in the future; the government as a whole, and particularly the agencies whose records the archives appraises; users of archives; and the public at large. Does current documentation make the appraisal process understandable for all of these stakeholder groups? What modifications in practices for documenting appraisal are required to make selection activities more open and transparent for the various constituencies with an interest in appraisal outcomes? If documentation of appraisal does not render the appraisal process comprehensible to all stakeholders in this activity, archivists cannot claim to be fully accountable for appraisal.

Archivists with responsibility for appraising government records have a special obligation to ensure that the appraisal documentation that they produce meets the needs of their two key stakeholder groups: the government agencies they serve and the users of archives. Much of the program-level documentation that NARA, LAC, and NAA produce is targeted at the government agencies which are their primary clientele. The information communicated to agency records management staff is intended to facilitate the appraisal business process by making them aware of the procedures to be followed in securing records disposal authorities. How effective is this documentation in helping agencies understand their roles and responsibilities – and that of the archives – in ensuring the appropriate disposition of government records? Does this documentation reach the agency personnel it is intended to assist? These questions could be addressed through studies designed to assess the level of awareness of personnel in government agencies about the appraisal and disposition services provided by their archival institutions and to determine whether existing documentation of appraisal is sufficient to allow agencies to efficiently perform their disposition-related responsibilities. Another potential

avenue for research would entail exploration of whether the documentation which archival institutions create during the appraisal process can be utilized by agencies to improve their records management programs.

Careful documentation of the appraisal process and disposition decisions is needed to inform users of archives about the selection activities which have shaped the collections in which they conduct research. Anecdotal evidence and media accounts suggest that many users of archives – as well as the general public – have little awareness of the professional practices, including appraisal, that are involved in the routine administration of archival collections. Documentation of appraisal is essential for communicating to users of archives that not all records can be saved and in enabling them to better understand the resulting archival record and its limitations. Research about the perceptions that users have about archival appraisal would prove useful in helping archivists to assess what types of information would be useful to include in appraisal documentation in order to render this activity more comprehensible to the public.

Conclusion

Accountability has long been a concept that is central to the work of archivists, who recognize that records serve as evidence that permits individuals and organizations to be held accountable for their actions. It is time for archivists to adopt an explicit focus on creating and preserving a record that accounts for their own professional activities, beginning with the appraisal function. This is a responsibility which archivists owe to society, which has delegated selection activities to the archival profession. Creating accountable documentation entails a commitment and a conscious effort on the part of archivists to explain their appraisal methodologies and disposition decisions in language that is accessible to a variety of stakeholders in archives. Ensuring that documentation of appraisal is sufficient for the purposes

of demonstrating accountability represents both a challenge and an opportunity for the archival community, but is an essential aspect of achieving openness and transparency in appraisal. This comparative analysis of practices for documenting appraisal at the National Archives and Records Administration in the United States, Library and Archives Canada, and the National Archives of Australia and the resulting guidelines for accountable documentation serve as a starting point for future research related to the role of documentation in achieving archival accountability for appraisal.

APPENDICES

Appendix A: University of Pittsburgh Institutional Review Board Approval

Appendix B: Introduction to the Research Study

Appendix C: Site Authorizations

Appendix C-1: NARA Site Authorization

Appendix C-2: LAC Site Authorization

Appendix C-3: NAA Site Authorization

Appendix D: Interview Questions

APPENDIX A:
UNIVERSITY OF PITTSBURGH
INSTITUTIONAL REVIEW BOARD APPROVAL



University of Pittsburgh
Institutional Review Board

Exempt and Expedited Reviews
Christopher M. Ryan, Ph.D., Vice Chair

3500 Fifth Avenue
Suite 105
Pittsburgh, PA 15213
Phone: 412.578.3424
Fax: 412.578.8566
e-mail: irbexempt@msx.upmc.edu

TO: Jennifer Marshall
FROM: Christopher M. Ryan, Ph.D., Vice Chair *Chris*
DATE: 6/26/03

PROTOCOL: Appraising for Accountability: A Comparative Case Study of Appraisal Documentation at the National Archives of Australia, the National Archives of Canada, and the National Archives and Records Administration

IRB Number: 0306043

The above-referenced protocol has been reviewed by the University of Pittsburgh Institutional Review Board. This protocol meets all the necessary requirements and is hereby designated as "exempt" under section 45 CFR 46.101(b)(2). Exempt protocols must be re-reviewed every three years. If you wish to continue the research after that time, a new application must be submitted.

- If any modifications are made to this project, please submit an 'exempt modification' form to the IRB.
- Please advise the IRB when your project has been completed so that it may be officially terminated in the IRB database.
- This research study may be audited by the University of Pittsburgh Research Conduct and Compliance Office.

Approval Date: 6/26/03
Renewal Date: 6/26/ 2006

APPENDIX B:
INTRODUCTION TO THE RESEARCH STUDY

APPENDIX B

Accounting for Disposition: A Comparative Case Study of Appraisal Documentation at the National Archives and Records Administration, Library and Archives Canada, and the National Archives of Australia

Introduction to the Research Study

The objectives of this research are to develop a better understanding of what constitutes accountable documentation of the appraisal decisions made by government archivists regarding public records and to produce preliminary guidelines which identify and describe the elements of accountable documentation of appraisal in national archival institutions. To achieve these goals, this study will combine a content analysis of appraisal documentation produced at the National Archives and Records Administration in the United States, Library and Archives Canada, and the National Archives of Australia with interviews of staff in each institution responsible for the development and implementation of appraisal policy. Subsequent to the content analysis and interviews, preliminary guidelines for accountable appraisal will be developed and circulated to staff at each institution for comment, then revised based upon their input. Each interview is expected to last about one hour; the amount of time spent critiquing the guidelines for accountable appraisal documentation will be at the discretion of each respondent. It is anticipated that the total time commitment for each participant will be no more than 1 ½ to 2 hours. If you are willing to participate in this study, you will be asked questions related to your experience with documenting the appraisal process and your professional opinions about the role of appraisal documentation as an accountability tool. There are no foreseeable risks associated with this project, nor are there any direct benefits to you. No personal information will be recorded, and your responses will be kept confidential. Your participation is voluntary, and you may withdraw from this project at any time. This study is being conducted by Jennifer Marshall, a doctoral student in the School of Information Sciences at the University of Pittsburgh, who can be reached at 304-472-2366 or via e-mail at marshall@mail.sis.pitt.edu, if you have any questions.

APPENDIX C:

SITE AUTHORIZATIONS

Appendix C-1: NARA Site Authorization

Appendix C-2: LAC Site Authorization

Appendix C-3: NAA Site Authorization

National Archives at College Park



8601 Adelphi Road College Park, Maryland 20740-6001

July 22, 2003

Jennifer Marshall
RR2 Box 375-2
Buckhannon, WV 26201

Dear Ms. Marshall:

This letter will serve as authorization for you to make an on-site visit to the National Archives and Records Administration (NARA) facility in College Park, Maryland, to conduct research for your dissertation study, entitled "Appraising for Accountability: A Comparative Case Study of Appraisal Documentation at the National Archives of Australia, the National Archives of Canada and the National Archives and Records Administration." I understand that this research will involve examination of institutional documentation of the appraisal process and interviews of selected members of the National Archives and Record Administration's appraisal staff. This research visit is expected to take place during the week of July 28, 2003.

We are happy to be able to help you with your research. I do want to remind you that we will be sharing with you the types of documentation and procedures that NARA has traditionally used in our appraisal and scheduling processes. As part of the NARA Records Management Initiatives, many of these processes are being reviewed and changed as appropriate to meet today's government business and records needs.

Sincerely,

LEWIS J. BELLARDO
Deputy Archivist of the United States
and Chief of Staff



National Archives
of Canada

Archives nationales
du Canada

Government Records
Branch

Direction des archives
gouvernementales

395 Wellington Street
Ottawa, Ontario
K1A 0N3

395, rue Wellington
Ottawa (Ontario)
K1A 0N3

Your file *Votre référence*

Our file *Notre référence*

August 26, 2003

Jennifer Marshall
RR2 Box 375-2
Buckhannon, WV 26201
U.S.A.

Dear Ms. Marshall:

This letter will serve as authorization for you to make an on-site visit to the Library and Archives of Canada to conduct research for your dissertation study, entitled "Appraising for Accountability: A Comparative Case Study of Appraisal Documentation at the National Archives of Australia, the Library and Archives of Canada and the National Archives and Records Administration."

I understand that this research will involve examination of institutional documentation of the appraisal process and interviews with selected members of the Government Archives Division engaged in appraisal and disposition work. This research visit is expected to take place during the week of September 8, 2003.

We look forward to receiving you that week and wish you the best with your dissertation research.

Yours sincerely,

Richard Brown, Director
Government Archives Division

Canada



NATIONAL
ARCHIVES
OF AUSTRALIA

Our reference:

2001/1190

Ms Jennifer Marshall
RR2 Box 375-2
Buckhannon, WV 26201
USA

Dear Ms Marshall


I am writing to confirm that it will be possible for you to conduct research on-site at the National Archives of Australia for the purposes of your study, currently titled 'Appraising for Accountability: A Comparative Case Study of Appraisal Documentation at the National Archives of Australia, the National Archives of Canada and the National Archives and Records Administration'.

I understand that as part of your work as a doctoral candidate, School of Information Sciences at the University of Pittsburgh, you will require access to the Archives as well as to relevant documentation and to interview nominated members of staff. Also that you plan to visit the National Archives here in Canberra, during the week of the 25 August 2003.

We will be glad to facilitate these arrangements on your behalf.

If you need any additional information please contact me or my colleague, Adrian Cunningham, Director Recordkeeping Standards & Policy, with whom you have already been in touch.

Yours sincerely


Venetia Beale
Director
Recordkeeping Implementation

3 July 2003

APPENDIX D:
INTERVIEW QUESTIONS

APPENDIX D

Interview Questions

Note to interviewees: These questions will be used as a framework in which to discuss archival accountability for appraisal through the documentation produced as part of that process. Interviews will not adhere to a rigid structure, in order to allow participants to address those questions which are most relevant to their work. Feel free to raise additional issues which you believe are relevant to accountability for archival appraisal.

1. Please describe how appraisal decisions are documented at your institution. If possible, describe the documentation process in the context of a recent disposition decision that you were involved in documenting.
2. What do you consider to be the most important aspects of appraisal to document, particularly for the purposes of accountability?
3. What do you consider to be the most difficult aspects of documenting appraisal?
4. What do you consider the strengths of how appraisal is documented at your institution? Why?
5. Are there areas that you think could be improved in the documentation of appraisal at your institution? If so, what are they? Do you have suggestions for how to improve them?
6. Can you describe any cases in your professional experience when you or others considered documentation of a particular disposition decision inadequate? If so, what seemed to be missing?
7. How could documentation of appraisal be made more open and transparent to government agencies?
8. How could documentation of appraisal be made more open and transparent to the public?
9. How might archivists use documentation about appraisal to improve their management of public records?
10. How should documentation of appraisal be made available to the public?
11. Are there any other comments that you would like to make about documentation, appraisal, and accountability?

Thank you for sharing your time, experience, and insights for this research.

BIBLIOGRAPHY

Monographs and Articles

- Abraham, Terry. "Collection Policy or Documentation Strategy: Theory and Practice." *American Archivist* 54 (Winter 1991): 45-52.
- _____. "Documentation Strategies: Ten (or More) Years Later." Available at <http://www.uidaho.edu/special-collections/papers/docstr10.htm>, accessed 12 July 2006.
- Alexander, Philip N., and Helen W. Samuels. "The Roots of 128: A Hypothetical Documentation Strategy." *American Archivist* 50 (Fall 1987): 518-531.
- Badgley, Kerry, and Claude Meunier, "Macroappraisal, the Next Frontier: An Approach for Appraising Large and Complex Government Institutions." *Archival Science* 5 (December 2005): 261-283.
- Bailey, Catherine. "From the Top Down: The Practice of Macro-Appraisal." *Archivaria* 43 (Spring 1997): 89-129.
- _____. "Turning Macro-appraisal Decisions into Archival Holdings: Crafting Function-based Terms and Conditions for the Transfer of Archival Records." *Archivaria* 61 (Spring 2006): 147-179.
- Bassett, T. D. Seymour. "Documenting Recreation and Tourism in New England." *American Archivist* 50 (Fall 1987): 550-569.
- Bastian, Jeannette Allis. "Defining Custody: The Impact of Archival Custody on the Relationship Between Communities and Their Historical Records in the Information Age -- A Case Study of the United States Virgin Islands." Ph.D. diss., University of Pittsburgh, 1999.
- Bauer, G. Philip. *The Appraisal of Current and Recent Records: Staff Information Paper #13* (Washington, DC: National Archives, 1946).
- Beaven, Brian P. N. "'But Am I Getting My Records?': Squaring the Circle with *Terms and Conditions* Expressed in Relation to Function and Activity." *Archival Science* 5 (December 2005): 315-341.
- _____. "Macro-Appraisal: From Theory to Practice." *Archivaria* 48 (Fall 1999): 154-198.
- Beekhuis, M. and H.G. Oost. "Logic Model: Institutional Study." (The Hague: 1992), typescript.
- Beers, Henry P. "Historical Development of the Records Disposal Policy of the Federal Government Prior to 1934." *American Archivist* 7 (July 1944).

- Berner, Richard C. *Archival Theory and Practice in the United States: A Historical Analysis*. Seattle: University of Washington Press, 1983.
- Black, Edwin. *IBM and the Holocaust: The Strategic Alliance between Nazi Germany and American's Most Powerful Corporation*. New York: Crown Publishers, 2001.
- Blanton, Thomas S., ed. *White House E-Mail: The Top Secret Computer Messages the Reagan/Bush White House Tried to Destroy*. New York: The New Press, 1995.
- Boles, Frank. "Mix Two Parts Interest to One Part Information and Appraise Until Done: Understanding Contemporary Record Selection Processes." *American Archivist* 50 (Summer 1987): 356-369.
- _____. "Sampling in Archives." *American Archivist* 44 (Spring 1981): 125-130.
- _____. *Selecting & Appraising Archives & Manuscripts*. Archival Fundamentals Series II. Chicago: Society of American Archivists, 2005.
- Boles, Frank and Julia Marks Young. "Exploring the Black Box: The Appraisal of University Administrative Records." *American Archivist* 48 (Spring 1985): 121-135.
- Boles, Frank in association with Julia Marks Young. *Archival Appraisal*. New York: Neal-Schuman Publishers, Inc., 1991.
- Boles, Frank and Mark A. Greene. "Et Tu Schellenberg? Thoughts on the Dagger of American Archival Appraisal Theory." *American Archivist* 59 (Summer 1996): 298-310.
- Booms, Hans. "Society and the Formation of a Documentary Heritage: Issues in the Appraisal of Archival Sources." *Archivaria* 24 (Summer 1987): 69-107.
- _____. "Überlieferungsbildung: Keeping Archives as a Social and Political Activity." *Archivaria* 33 (Winter 1991-92): 25-33.
- Bradsher, James Gregory. "An Administrative History of the Disposal of Federal Records, 1789-1949." *Provenance: Journal of the Society of Georgia Archivists* 3 (Fall 1985): 1-21.
- _____. "An Administrative History of the Disposal of Federal Records, 1950-1985." *Provenance: Journal of the Society of Georgia Archivists* 4 (Fall 1986): 49-73.
- _____. "The FBI Records Appraisal." *The Midwestern Archivist* 13:2 (1988): 51-66.
- Brichford, Maynard J. *Archives and Manuscripts: Appraisal and Accessioning*. SAA Basic Manual Series. Chicago: Society of American Archivists, 1977.

- Brooks, Philip C. "Current Aspects of Records Administration: The Archivist's Concern in Records Administration." *American Archivist* 6 (July 1943): 158-164.
- _____. "The Selection of Records for Preservation," *American Archivist* 3 (October 1940): 228-234.
- Brown, Richard. "Back to the Strategic Roots: Appraisal Reform at the National Archives of Canada." *Archival Issues* 24:2 (1999): 113-122.
- _____. "Macro-Appraisal Theory and the Context of the Public Records Creator." *Archivaria* 40 (Fall 1995): 121-142.
- _____. "Records Acquisition Strategy and Its Theoretical Foundation: The Case for a Concept of Archival Hermeneutics." *Archivaria* 33 (Winter 1991-1992): 34-65.
- Cook, Terry. "An Appraisal Methodology: Guidelines for Performing an Archival Appraisal." (Government Archives Division, National Archives of Canada: 31 December 1991), typescript.
- _____. "Documentation Strategy." *Archivaria* 34 (Summer 1992): 181-191.
- _____. "Macroappraisal: The New Theory and Strategy for Records Disposition at the National Archives of Canada." (paper presented at the annual conference of the Society of American Archivists, Washington, DC, September 1995), 1-11.
- _____. "Macro-appraisal and Functional Analysis: Documenting Governance Rather than Government." *Journal of the Society of Archivists* 25:1 (2004): 5-18.
- _____. "Macroappraisal in Theory and Practice: Origins, Characteristics, and Implementation in Canada, 1950-2000." *Archival Science* 5 (December 2005): 101-161.
- _____. "'Many Are Called But Few Are Chosen': Appraisal Guidelines for Sampling and Selecting Case Files." *Archivaria* 32 (Summer 1991): 25-50.
- _____. "Mind Over Matter: Towards a New Theory of Archival Appraisal." In *The Archival Imagination: Essays in Honour of Hugh A. Taylor*, ed. Barbara L. Craig, 38-70. Ottawa: Association of Canadian Archivists, 1992.
- _____. "'A Monumental Blunder': The Destruction of Records on Nazi War Criminals in Canada." In *Archives and the Public Good: Accountability and Records in Modern Society*, ed. Richard J. Cox and David A. Wallace, 37-65. Westport, CT: Greenwood Press, 2002.
- _____. "Remembering the Future: The Role of Archives in Constructing Social Memory." Unpublished paper presented at the Sawyer Seminar on Archives, Documentation, and the Institutions of Social Memory, Ann Arbor, MI, January 31, 2001.

- _____. "What is Past Is Prologue: A History of Archival Ideas Since 1898 and the Future Paradigm Shift." *Archivaria* 43 (Spring 1997): 17-63.
- Couture, Carol. "Archival Appraisal: A Status Report." *Archivaria* 59 (Spring 2005): 96-97.
- Cox, Richard J. "Archival Documentation Strategy: A Brief Intellectual History 1984-1994 and Practical Description," *Janus* (1995): 76-93.
- _____. "The Archival Documentation Strategy and Its Implications for the Appraisal of Architectural Records." *American Archivist* 59 (Spring 1996): 144-154.
- _____. *Closing an Era: Historical Perspectives on Modern Archives and Records Management*. New Directions in Information Management, ed. Michael Buckland, no. 35. Westport, CT: Greenwood Press, 2000.
- _____. "The Concept of Public Memory and Its Impact on Archival Public Programming." *Archivaria* 36 (Autumn 1993): 122-135.
- _____. *Documenting Localities: A Practical Model for American Archivists and Manuscript Curators*. Metuchen, NJ: Scarecrow Press, 1996.
- _____. "A Documentation Strategy Case Study: Western New York." *American Archivist* 52 (Spring 1989): 192-200.
- _____. "The Documentation Strategy and Archival Appraisal Principles: A Different Perspective." *Archivaria* 38 (Fall 1994): 11-36.
- _____. *Managing Records as Evidence and Information*. Westport, CT: Quorum Books, 2001.
- _____. *No Innocent Deposits: Forming Archives by Rethinking Appraisal*. Lanham, MD: The Scarecrow Press, Inc., 2004.
- _____. "Records Management Scheduling and Archival Appraisal." *Records and Information Management Report* 14 (April 1998) : 1-16.
- Cox, Richard J. and David A. Wallace. *Archives and the Public Good: Accountability and Records in Modern Society*. Westport, CT: Greenwood Press, 2002.
- Cox, Richard J., and Helen W. Samuels. "The Archivist's First Responsibility: A Research Agenda to Improve the Identification and Retention of Records of Enduring Value." *American Archivist* 51 (Winter and Spring 1988): 28-42.
- Craig, Barbara. *Archival Appraisal: Theory and Practice*. München: K. G. Saur, 2004.

- Cunningham, Adrian. "Commonwealth Records and Social Memory: If We Can't Remember Everything, Can We Choose What to Forget?" *Australian Historical Association Bulletin* 91 (2002): 79-82.
- Cunningham, Adrian, and Robin Oswald. "'Some Functions Are More Equal Than Others: The Development of Macroappraisal Strategy for the National Archives of Australia.'" *Archival Science* 5 (December 2005): 163-184.
- Cummings, Susan. "Reengineering NARA Records Management Policies." *Comma*, nos. 1-2 (2002): 63-65.
- Dan, Kathryn. "Acquisition, Appraisal and International Standard ISO 15489." *Comma*, nos. 1-2 (2002): 73-76.
- Dearstyne, Bruce W. *Managing Government Records & Information*. Prairie Village, KS: ARMA International, 1999.
- Dixon, Margaret. "Beyond Sampling: Returning to Macroappraisal for the Selection of Case Files." *Archival Science* 5 (December 2005): 285-313.
- Dirks, John M. "Accountability, History, and Archives: Conflicting Priorities or Synthesized Strands?" *Archivaria* 57 (Spring 2004): 27-48.
- Duff, Wendy M. "Harnessing the Power of Warrant." *American Archivist* 61 (Spring 1998): 88-105.
- Duranti, Luciana. "The Concept of Appraisal and Archival Theory." *American Archivist* 57 (Spring 1994): 328-344.
- _____. "The Odyssey of Records Managers." In *Canadian Archival Studies and the Rediscovery of Provenance*, 29-60. Ed. Tom Nesmith. Metuchen, NJ: The Scarecrow Press, Inc., 1993.
- Eastwood, Terrence M. "Reflections on the Development of Archives in Canada and Australia." In *Archival Documents: Providing Accountability Through Recordkeeping*, ed. Sue McKemmish and Frank Upward, 27-39. Melbourne: Ancora Press, 1993.
- _____. "Reflections on the Goal of Archival Appraisal in Democratic Societies." *Archivaria* 54 (Fall 2002): 59-71.
- Elliott, Clark A, ed. *Understanding Progress as Process: Documentation of the History of Post-War Science and Technology in the United States – Final Report of the Joint Committee on Archives and Technology*. Chicago: Society of American Archivists, 1983.
- Endelman, Judith E. "Looking Backward to Plan for the Future: Collection Analysis for Manuscript Repositories." *American Archivist* 50 (Summer 1987): 340-355.

- Ericson, Timothy L. "To Approximate June Pasture: The Documentation Strategy in the Real World." *Archival Issues* 22:1 (1998): 5-20.
- Gilliland-Swetland, Anne Jervois. "Development of an Expert Assistant for Archival Appraisal Of Electronic Communications: An Exploratory Study." Ph.D. diss., University of Michigan, 1995.
- Glantz, Stanton A. *The Cigarette Papers*. Berkeley: University of California Press, 1996.
- Golder, Hilary. *Documenting a Nation: Australian Archives – The First Fifty Years*. Canberra, ACT: Australian Government Publishing Service, 1994.
- Greene, Mark. "'The Surest Proof': A Utilitarian Approach to Appraisal." *Archivaria* 45 (Spring 1998): 127-169.
- Greene, Mark A. and Todd J. Daniels-Howell. "Documentation with an Attitude: A Pragmatist's Guide to the Selection and Acquisition of Modern Business Records." In *Records of American Business*, ed. James O'Toole. Chicago: Society of American Archivists, 1997.
- Fortier, Normand. "Transparency, Compliance, and Accountability: Developing a Knowledge Infrastructure for Macroappraisal at Library and Archives Canada." *Archival Science* 5 (December 2005): 343-360.
- Haas, Joan K., Helen W. Samuels, and Barbara Trippel Simmons. *Appraising the Records of Modern Science and Technology: A Guide*. Cambridge, MA: Massachusetts Institute of Technology, 1985.
- Hackman, Larry, and Joan Warnow-Blewett. "The Documentation Strategy Process: A Model and a Case Study." *American Archivist* 50 (Winter 1987): 12-47.
- Ham, F. Gerald. "Archival Choices: Managing the Historical Record in an Age of Abundance." *American Archivist* 47 (Winter 1984): 11-22.
- _____. "The Archival Edge." *American Archivist* 38 (January 1975): 5-13.
- _____. "Managing the Historical Record in an Age of Abundance." *American Archivist* 47 (Winter 1984): 11-22.
- _____. *Selecting and Appraising Archives and Manuscripts*. SAA Archival Fundamental Series. Chicago: Society of American Archivists, 1993.
- Hayward, Robert J. "'Working in Thin Air': Of Archives and the Deschênes Commission." *Archivaria* 26 (Summer 1988): 122-136.

- A Heritage at Risk: The Proceedings of the Evangelical Archives Conference*. July 15-18, 1988. Wheaton, IL: Billy Graham Center, Wheaton College, 1988.
- Hofman, Hans. "The Netherlands – A Window to the Past: Archives on the Interface of Two Worlds," in *A Window to the Future: Papers from a Conference on Electronic Information held between 20 and 24 June 1994*, ed. Elizabeth Shepherd (London: University College London, 1995), 44-53.
- Honer, E. and S. Graham. "Should Users Have a Role in Determining the Future Archive?: The Approach Adopted by the Public Record Office, the U.K. National Archive, to the Selection of Records for Permanent Preservation." *Liber Quarterly: The Journal of European Research Libraries* 11.4 (2001): 382-399.
- Horsman, Peter. "Appraisal on Wooden Shoes: The Netherlands PIVOT Project," unpublished paper.
- Hurley, Chris. "Archivists & Accountability: A Commentary on Ethical Standards." June 2004, revised 2005. Accessed 12 July 2006, available from <http://www.caldeson.com/RIMOS/archivists.01.html>.
- _____. "Records and the Public Interest: The 'Heiner Affair' in Queensland, Australia." In *Archives and the Public Good: Accountability and Records in Modern Society*, 293-317. Ed. Richard J. Cox and David A. Wallace. Westport, CT: Greenwood Press, 2002.
- Iacovino, Livia. "Accountability for the Disposal of Commonwealth Records and the Preservation of its Archival Resources: Part I – The Context." In *Archival Documents: Providing Accountability Through Recordkeeping*, ed. Sue McKemmish and Frank Upward, 55-71. Melbourne: Ancora Press, 1993.
- _____. "Accountability for the Disposal of Commonwealth Records and the Preservation of its Archival Resources: Part II – The Disposal Practice of Australian Archives." In *Archival Documents: Providing Accountability Through Recordkeeping*, ed. Sue McKemmish and Frank Upward, 73-97. Melbourne: Ancora Press, 1993.
- International Organization for Standardization. *ISO 15489-1: Information and Documentation—Records Management – Part I: General*. Geneva: International Organization for Standardization, 2001.
- _____. *ISO/TR 15489-2: Information and Documentation—Records Management – Part II: Guidelines*. Geneva: International Organization for Standardization, 2001.
- Jenkinson, Hilary. *A Manual of Archive Administration*. Oxford: Clarendon Press, 1922.
- Jimerson, Randall C. "Embracing the Power of Archives." *American Archivist* 69 (Spring/Summer 2006): 19-32.

- Jung, Maureen A. "Documenting Nineteenth-Century Quartz Mining in Northern California." *American Archivist* 53 (Summer 1990).
- Kearns, Kevin P. *Managing for Accountability: Preserving the Public Trust in Public and Nonprofit Organizations*. Jossey-Bass Nonprofit Sector Series and Public Administration Series. San Francisco: Jossey-Bass Publishers, 1996.
- Kelly, Russell. "The National Archives of Australia's New Approach to Appraisal." *Archives and Manuscripts* 29 (May 2001): 72-85.
- Krizack, Joan D., ed. *Documentation Planning for the U.S. Healthcare System*. Baltimore, MD: The Johns Hopkins University Press, 1994.
- _____. "Hospital Documentation Planning." *American Archivist* 56 (Winter 1993): 16-34.
- Kolesrud, Ole. "The Evolution of Basic Appraisal Principles – Some Comparative Observations." *American Archivist* 55 (Winter 1992) : 26-39.
- Lewinson, Paul. "Archival Sampling." *American Archivist* 20 (October 1957): 291-312.
- Ling, Ted. "The Commonwealth's First Archives Bill 1927." *Archives and Manuscripts* 29 (May 2001): 98-109.
- Loewen, Canadace. "Accounting for Appraisal at Library and Archives Canada: From Disposition to Access and Accessibility." *Archival Science* 5 (December 2005): 239-259.
- MacLean, Ian. "Australian Experience in Archives and Records Management." *American Archivist* 22:4 (1959).
- Marshall, Jennifer A. "Documentation Strategies in the Twenty-First Century?: Rethinking Institutional Priorities and Professional Limitations." *Archival Issues* 23:1 (1998): 59-74.
- McCoy, Donald R. *The National Archives: America's Ministry of Documents, 1934-1968*. Chapel Hill: The University of North Carolina Press, 1978.
- McDonald, John. "Accountability in Government in an Electronic Age." Paper presented at the Electronic Records Seminar, Kuala Lumpur, Malaysia on June 25, 1998. Available through the Internet Archive's Wayback Machine, <http://web.archive.org/web/20010726105930/www.irmt.org/education/malpaper2.html>, accessed 12 July 2006.
- McKemmish, Sue. "Recordkeeping, Accountability, and Continuity: The Australian Reality." In *Archival Documents: Providing Accountability through Recordkeeping*, ed. Sue McKemmish and Frank Upward, 9-26. Melbourne: Ancora Press, 1993).

- _____. "The Smoking Gun: Recordkeeping and Accountability." Paper presented at the 22nd Annual Conference of the Archives and Records Association of New Zealand, Dunedin, New Zealand, 3-5 September 1998. Available at <http://www.sims.monash.edu.au/research/rcrg/publications/recordscontinuum/smckp2.html>, accessed 12 July 2006.
- McKemmish, Sue and Frank Upward, eds. *Archival Documents: Providing Accountability Through Recordkeeping*. Melbourne: Ancora Press, 1993.
- McKemmish, Sue and Glenda Acland. "Archivists at Risk: Accountability and the Role of the Professional Society." Paper presented at the 1999 Annual Conference of the Australian Society of Archivists, July 1999. Available at <http://www.sims.monash.edu.au/research/rcrg/publications/archive1.html>, accessed 12 July 2006.
- McKemmish, Sue and Michael Piggott, eds. *The Records Continuum: Ian Maclean and Australian Archives First Fifty Years*. Clayton, VIC: Ancora Press, 1994.
- Meijer, Albert. "Anticipating Accountability Processes." *Archives and Manuscripts* 28 (May 2000): 52-63.
- Mulgan, Richard. *Holding Power to Account: Accountability in Modern Democracies*. New York: Palgrave MacMillan, 2003.
- "A National Archives System: A Background Document." *Archives and Manuscripts* 5 (November 1973): 104-109.
- Norton, Margaret Cross. *Norton on Archives: The Writings of Margaret Cross Norton on Archival & Records Management*, ed. Thornton W. Mitchell. Chicago: Society of American Archivists, 1975.
- O'Toole, James M. *Understanding Archives and Manuscripts*. SAA Archival Fundamental Series. Chicago: Society of American Archivists, 1990.
- Paris, Marion. *Library School Closings: Four Case Studies*. Metuchen, N.J.: The Scarecrow Press, Inc., 1988.
- Parkinson, Jane. "Accountability in Archival Science." Master's thesis, University of British Columbia, 1993.
- Pearce-Moses, Richard, comp. *A Glossary of Archival & Records Terminology*. Archival Fundamentals Series II. Chicago: Society of American Archivists, 2005.
- Phillips, Faye. "Developing Collecting Policies for Manuscript Collections," *American Archivist* 47 (Winter 1984): 30-42.

- Piché, Jean- Stéphan. "Macroappraisal and Duplication of Information: Federal Real Property Management Records" *Archivaria* 39 (Spring 1995): 39-50.
- Piggott, Michael. "Appraisal: The State of the Art." Paper presented at a professional Development workshop presented by ASA South Australia Branch, 26 March, 2001. Available at <http://www.archivists.org.au/sem/misc/piggott.html>, accessed 12 July 2006.
- _____. "Beginnings." In *The Records Continuum: Ian Maclean and Australian Archives First Fifty Years*, ed. Sue McKemmish and Michael Piggott, 1-17. Clayton, VIC: Ancora Press, 1994.
- Planning for the Archival Profession: A Report of the SAA Task force on Goals and Priorities*. Chicago: Society of American Archivists, 1986.
- Powell, Ronald R. *Basic Research Methods for Librarians*, 3d ed. Contemporary Studies in Information Management, Policy, and Services, ed. Peter Herson. Greenwich, CT: Ablex Publishing Corporation, 1997.
- Powell, Sheila. "Archival Reappraisal: The Immigration Case Files." *Archivaria* 33 (Winter 1991-1992): 104-116.
- Procter, Margaret, Michael G. Cook, and Caroline Williams, eds. *Political Pressure and the Archival Record*. Chicago: Society of American Archivists, 2005.
- Reed-Scott, Jutta. "Collection Management Strategies for Archivists," *American Archivist* 47 (Winter 1984): 23-29.
- Renehan, Marion. "Unassailable Evidence: The Nexus Between Recordkeeping and Public Sector Accountability." In *Archival Documents: Providing Accountability Through Recordkeeping*, ed. Sue McKemmish and Frank Upward, 131-144. Melbourne: Ancora Press, 1993.
- Roberts, John. "Macroappraisal Kiwi Style: Reflections on the Impact and Future of Macroappraisal in New Zealand." *Archival Science* 5 (December 2005): 185-210.
- _____. "One Size Fits All? The Portability of Macro-Appraisal by a Comparative Analysis of Canada, South Africa, and New Zealand." *Archivaria* 52 (Fall 2001): 47-68.
- Robinson, Catherine. "Records Control and Disposal Using Functional Analysis." *Archives and Manuscripts* 25 (November 1997): 288-303.
- Ruller, Thomas J. "Dissimilar Appraisal Documentation as an Impediment to Sharing Appraisal Data: A Survey of Appraisal Documentation in Government Archival Repositories." *Archival Issues* 17:1 (1992): 66-73.

- Samuels, Helen W. "Improving Our Disposition: Documentation Strategy." *Archivaria* 33 (Winter 1991-92): 125-141.
- _____. *Varsity Letters: Documenting Modern Colleges and Universities*. Metuchen, NJ: The Scarecrow Press, Inc., 1992.
- _____. "Who Controls the Past." *American Archivist* 49 (Spring 1986): 109-124.
- Schaeffer, Roy C. "Transcendent Concepts: Power, Appraisal, and the Archivist as 'Social Outcast.'" *American Archivist* 55 (Fall 1992): 615.
- Schellenberg, T. R. *The Appraisal of Modern Public Records, National Archives Bulletin #8*. Washington: National Archives, 1956. Excerpts reprinted in *A Modern Archives Reader: Basic Readings on Archival Theory and Practice*, ed. Maygene F. Daniels and Timothy Walch, 57-70. Washington: National Archives and Records Administration, 1984.
- _____. *Disposition of Federal Records: How to Establish an Effective Program for the Preservation and Disposal of Federal Records*. Washington, DC: National Archives, 1956.
- _____. *The Management of Archives*. New York: Columbia University Press, 1965. Reprint, Washington: National Archives and Records Administration, [date?].
- _____. *Modern Archives: Principles and Techniques*. Chicago: The University of Chicago Press, 1956.
- Schwirtlich, Anne-Marie. "The Australian War Memorial and Commonwealth Records, 1942-1952. In *The Records Continuum: Ian Maclean and Australian Archives First Fifty Years*, ed. Sue McKemmish and Michael Piggott, 18-34. Clayton, VIC: Ancora Press, 1994.
- _____. "The Functional Approach to Appraisal – The Experience of the National Archives of Australia." *Comma*, nos. 1-2 (2002): 57-62.
- Seidman, Irving. *Interviewing as Qualitative Research: A Guide for Researchers in Education and the Social Sciences*, 2d ed. New York: Teachers College Press, 1998.
- Smith, Clive. "The Australian Archives." *Archives and Manuscripts* 8 (June 1980): 33-40.
- Smith, George R. "Before and After the Lamb Report." *Archives and Manuscripts* 7 (August 1977): 34-40.
- Stake, Robert E. *The Art of Case Study Research*. Thousand Oaks, CA: SAGE Publications, Inc., 1995.

- Standards Australia. *Australian Standard AS 4390-1996: Records Management*. Homebush, New South Wales: SAI Global Business Publishing, 1996.
- Steinwall, Susan D. "Appraisal and the FBI Files Case: For Whom Do Archivists Retain Records?" *American Archivist* 49 (Winter 1986): 52-63.
- Suderman, Jim. "An Accountability Framework for Archival Appraisal." Paper presented at the Eastern and Southern Branch of the International Council of Archives Conference, Maputo, Mozambique, 22-26 July 2003. Available at <http://www.ahm.uem.mz/esarbic/docs/jim.pdf>, accessed 12 July 2006.
- _____. "Appraising Records of the Expenditure Management Function: An Exercise in Functional Analysis." *Archivaria* 43 (Spring 1997): 129-142.
- Stuckey, Steve. "Keepers of the Fame? The Custodial Role of Australian Archives – Its History and Its Future." In *The Records Continuum: Ian Maclean and Australian Archives First Fifty Years*, ed. Sue McKemmish and Michael Piggott, 35-48. Clayton, VIC: Ancora Press, 1994.
- Theoharis, Athan G. *A Culture of Secrecy: The Government Versus the People's Right to Know*. Lawrence, KS: University of Kansas Press, 1998.
- Thompson, Gloria A. "From Profile to Policy: A Minnesota Historical Society Case Study in Collection Development." *Midwestern Archivist* 13:2 (1983): 29-39.
- Tschan, Reto. "A Comparison of Jenkinson and Schellenberg on Appraisal." *American Archivist* 65 (Fall/Winter): 176-195.
- Twigge, Stephen. "Public Record, Public Consultation: The Involvement of Stakeholders in the Selection of Records at the Public Record Office, the United Kingdom National Archive." *Archives and Manuscripts* 31 (May 2003): 15-24.
- Wallace, David A. "Electronic Records Management Defined by Court Case and Policy." *Information Management Journal* 35 (January 2001): 4-15.
- _____. "The Public's Use of Federal Recordkeeping Statutes to Shape Federal Information Policy." Ph. D. diss., University of Pittsburgh, 1997.
- Waters, P.M.H. and H. Nagelhout. "Revolution in Records." (1994), typescript.
- Weideman, Christine. "A New Map for Field Work: Impact of Collections Analysis on the Bentley Historical Library." *American Archivist* 54 (Winter 1991): 54-60.
- Welsome, Eileen. *The Plutonium Files: America's Secret Medical Experiments in the Cold War*. New York: Dial Press, 1999.

- Wertheimer, Jack, Debra Bernhardt, and Julie Miller. "Toward the Documentation of Conservative Judaism." *American Archivist* 57 (Spring 1994): 374-379.
- Whorley, Tywana M. "The Tuskegee Syphilis Study: Access and Control Over Controversial Records." Ph. D. diss., University of Pittsburgh, 2006.
- _____. "The Tuskegee Syphilis Study and the Politics of Memory." In *Archives and the Public Good: Accountability and Records in Modern Society*, 165-175. Ed. Richard J. Cox and David A. Wallace. Westport, CT: Greenwood Press, 2002.
- Wickman, Danielle. "Bright Specimens for the Curious or the Somewhat Imponderable Guided By the Unfathomable: Use, Users, and Appraisal in Archival Literature." *Archives and Manuscripts* 28 (May 2000): 64-79.
- Wilson, Bruce. "Systematic Appraisal of the Records of The Government of Canada at the National Archives of Canada." *Archivaria* 38 (Fall 1994): 218-31.
- Wilson, Ian E. "The Fine Art of Destruction Revisited." *Archivaria* 49 (Spring 2000): 124-139.
- _____. "A Noble Dream: The Origins of the Public Archives of Canada." In *Canadian Archival Studies and the Rediscovery of Provenance*, ed. Tom Nesmith, 61-84. Metuchen, NJ: Scarecrow Press, 1993.
- Yin, Robert K. *Case Study Research: Design and Methods*, 2^d ed. Applied Social Research Methods Series. Vol. 5. Thousand Oaks, CA: SAGE Publications, Inc., 1994.
- Yorke, Stephen. "Great Expectations or None at All: The Role and Significance of Community Expectations in the Appraisal Function." *Archives and Manuscripts* 28 (May 2000) : 24-37.

Government Publications

- A Federal Records Management Glossary*. Washington, DC: National Archives and Records Administration, 1993.
- National Archives of Australia. *Administrative Functions Disposal Authority (2000)*. Available at <http://naa.gov.au/recordkeeping/disposal/authorities/gda/afda/summary.html>, accessed 4 January 2007.
- _____. *The DIRKS Manual: A Strategic Approach to Managing Business Information* (September 2001; revised July 2003). Available at <http://www.naa.gov.au/recordkeeping/dirks/dirksman/dirks.html>, accessed 4 January 2007.

- _____. *Macro-appraisal: Results of Consultation (2006)*. Available at <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Macro-appraisal-report.html>, accessed 4 January 2007.
- _____. *Making Choices: Deciding Which Records to Keep for Posterity (1998)*.
- _____. *Whole-of-Government Functional Analysis: The Relative Significance of Functions of Australian Government 1975-2005 (2006)*. Available at <http://www.naa.gov.au/recordkeeping/disposal/appraisal/Whole-of-government-functional-analysis.html>, accessed 4 January 2007.
- _____. *Why Records Are Kept: Directions in Appraisal (March 2000, revised 2003)*. Available at http://www.naa.gov.au/recordkeeping/disposal/why_keep/summary.html#contents, accessed 4 January 2007.
- National Archives and Records Administration. *Disposition of Federal Records: A Records Management Handbook (2000 Web edition)*. Available at <http://www.archives.gov/records-mgmt/publications/disposition-of-federal-records/>, accessed 4 January 2007.
- _____. *Inquiry into the Disposal of Records of the Naval Research Laboratory Stored at the Washington National Records Center (April 24, 1998)*. Available at <http://www.archives.gov/records-mgmt/policy/inquiry-records-disposal.html>, accessed 4 January 2007.
- _____. *NWML Standard Operating Procedures (1999)*.
- _____. *Strategic Directions: Appraisal Policy (May 2006)*. Available at <http://www.archives.gov/records-mgmt/initiatives/appraisal.html>, accessed 4 January 2007.
- _____. *Strategic Directions for Federal Records Management (July 31, 2003)*. Available at <http://www.archives.gov/records-mgmt/initiatives/strategic-directions.html>, accessed 4 January 2007.
- National Archives of Canada, Government Archives and Records Disposition Division. *Government-Wide Plan for the Disposition of Records, 1991-1996*. Available at <http://www.collectionscanada.ca/information-management/002/007002-2024-e.html>, accessed 4 January 2007.
- National Archives of Canada, Government Records Branch. *Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part A: Concepts and Theory*. Prepared by Terry Cook, Summer 2000. Reviewed and Edited by Richard Brown and Judith Roberts-Moore with the Government Records Disposition Program Review Committee: Angèle Alain, Catherine Bailey, Brian Beaven, Gabrielle Blais, Normand Fortier, Yvette Hackett, Andrew Horrall, Candace Loewen, Paul Marsden, Jean-Stéphen Piché, Sheila Powell,

Paul Sabourin, Summer 2001. Approved by the National Archivist of Canada, 17 October 2001. Available at <http://www.collectionscanada.ca/information-management/007/007007-1035-e.html>, accessed 4 January 2007.

_____. *Appraisal Methodology: Macro-Appraisal and Functional Analysis – Part B: Guidelines for Conducting an Archival Appraisal of Government Records*. Prepared by Terry Cook, Summer 2000. Reviewed and Edited by Richard Brown and Judith Roberts-Moore with the Government Records Disposition Program Review Committee: Angèle Alain, Catherine Bailey, Brian Beaven, Gabrielle Blais, Normand Fortier, Yvette Hackett, Andrew Horrall, Candace Loewen, Paul Marsden, Jean-Stéphen Piché, Sheila Powell, Paul Sabourin, Summer 2001. Approved by the National Archivist of Canada, 17 October 2001. Available at <http://www.collectionscanada.ca/information-management/007/007007-1041-e.html>

_____. *Drafting an Appraisal Report for the Disposition of Government Records*. Prepared by Richard Brown, February 2001.

_____. *Preserving the Archival and Historical Memory of Government*. Prepared by Richard Brown; edited and reviewed by Candace Loewen, Judith Roberts Moore, and Paul Sabourin, Summer 2001. Approved by the National Archivist of Canada, 17 October 2001. Available at <http://www.collectionscanada.ca/information-management/007/007007-1042-e.html>, accessed 4 January 2007.

Office of Records Administration. *Appraisal of Department of Justice Litigation Case Files: Final Report*. Washington, DC: National Archives and Records Administration, 1989.

State Archives of the Netherlands. “An Account for a Method for the Appraisal of Data Collections.” (PIVOT brochure, no date), typescript.

_____. “Pivot – A Turning Point in Appraisal Policy: Reduction of the Transfer Period in the Public Records Act and the Consequences for Government Administration.” (The Hague, 1991).

_____. “Taking Action – Government Action: Models, Research Method and Applications.” (The Hague, 1994).

Treasury Board of Canada Secretariat. *Policy on the Management of Government Information Holdings (1989)*.

_____. *Policy on the Management of Government Information (2003)*. Available at: http://www.tbs-sct.gc.ca/pubs_pol/ciopubs/TB_GIH/mgih-grdg_e.asp, accessed 4 January 2007.

Legislation

Archives Act 1983. *Commonwealth Consolidated Acts, Australia*. Available at http://www.austlii.edu.au/au/legis/cth/consol_act/aa198398/, accessed 4 January 2007.

Federal Records Act of 1950. *44 U.S. Code, Chapter 33*. Available at <http://www.archives.gov/about/laws/disposal-of-records.html>, accessed 4 January 2007.

Library and Archives of Canada Act. *Statutes of Canada* (2004, c. 11). Available at <http://laws.justice.gc.ca/en/L-7.7/index.html>, accessed 4 January 2007.