

The Record Group Concept: A Critique

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National Archives

THE Archivist of the United States, R. D. W. Connor, issued on March 1, 1940, a memorandum setting up a special committee for the study of the adequacy of finding aids in existence at the National Archives.¹ The Archivist cited the types of finding aids he wished to have examined; these included "historical summaries," "preliminary reports," and "recommendations on transfer," to mention but a few. The memorandum did not expressly refer to a need for studying the organization of the holdings of the National Archives.

Yet the committee, designated as the Finding Mediums Committee, did not limit itself to an examination of finding aids; and its findings resulted in changes more drastic than the Archivist might have anticipated. For one thing, the final report of the committee prompted a major reorganization of the National Archives, the most important feature of which was the abolition of the Divisions of Classification and Cataloging. But perhaps the more significant and original contribution of the committee, not merely to the National Archives but to archival science in general, was the concept of record groups.

Indeed, the committee could not have avoided considering the issue of the organization of the holdings. In the words of Solon J. Buck, a member of the committee, "we have to know what an archival group is before making a preliminary checklist."² It is difficult today to imagine how the National Archives could have operated—accessioned, cataloged, classified, inventoried, performed reference service, and so on—without some understanding of or consensus on how records ought to be grouped. Of course, records

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¹ Memorandum A-122. The author of this paper has been privileged to use the noncurrent permanent records of the National Archives, to be constituted as Record Group 64.

² Minutes of meeting of the Advisory Committee on Finding Mediums, Mar. 25, 1941.

came to the National Archives in groups—or accessions. More often than not an accession was not a *fonds*, but only part of one. The records were described even before accessioning, to ascertain their value. What should these descriptions be called? Should they be printed or reproduced and made available to members of the staff? And to searchers? These may have been some of the questions asked by our colleagues and predecessors. We must remind ourselves that, in 1940, the National Archives had been in existence for only 5 years. Not much description work had been done; nevertheless, the question of what ought to be the coverage of a checklist or an inventory had ceased to be premature.

The archivists on the Finding Mediums Committee, as well as other archivists on the staff of the National Archives, were groping for a term to connote a group of records. The term “collection” had been used by the Archivist himself, as, for example, when he wrote that the Division of Classification “must study the documents to know all the series in each collection.”³ The term did not sound scientific and it smacked of library practices. *Fonds* would have been scientific enough, but it presented other drawbacks. It was a French term; the official publications of the National Archives, either before 1940 or thereafter, do not authorize its use. *Fonds*? Dallas Irvine, then Chief of the Division of War Department Archives, and a member of the committee, contended, “. . . there are no such things.”⁴ No one was quite sure what the word meant, not even the French, Dr. Buck pointed out. The expressions “groups of records” and even “subgroups of records” were frequently used.⁵ On at least one occasion the word order in “groups of records” was inverted; when discussing the 1940 *Guide to the Material in the National Archives*, the Archivist wrote, “. . . there are . . . brief descriptions of record groups.”⁶ It was but a chance option of words; not until 1941 was a record group referred to as such and defined.⁷ This definition, as we shall see, was devised by Dr. Buck, who was soon to become Archivist of the United States.

The Finding Mediums Committee was composed of Marcus W. Price, Director of Archival Services, chairman; Dr. Buck, Chief

³ *Second Annual Report of the Archivist of the United States . . . 1936*, p. 45 (Washington, 1937).

⁴ Minutes of meeting of the Finding Medium Committee, Aug. 6, 1940.

⁵ For instance in the *Fourth Annual Report of the Archivist of the United States . . . 1938*, p. 17 (Washington, 1939).

⁶ *Sixth Annual Report of the Archivist of the United States . . . 1940*, p. 26 (Washington, 1941).

⁷ *Seventh Annual Report of the Archivist of the United States . . . 1941*, p. 29 (Washington, 1942).

of the Division of Publications; Philip M. Hamer, Chief of the Division of Reference; Dr. Irvine, Chief of a custodial division, the Division of War Department Archives; and W. L. G. Joerg, Chief of the Division of Maps and Charts.⁸ These archivists debated among themselves, invited other employees of the National Archives to answer questions or state opinions, and sought advice from competent outsiders such as Ernst Posner. A stenographer took notes of the proceedings, and the minutes were circulated among the members of the committee before the next meeting. These minutes make fascinating reading for anyone acquainted with the personalities involved and with the later history of the National Archives. For our purposes certain highlights will suffice.

The members of the committee argued that, for the sake of fruitful discussions, it was necessary to agree on the meaning of terms used in the course of the discussions. Hence, at the fourth meeting of the committee, Dr. Buck presented a list of terms with attempted definitions. The first of these terms was "archival group," the term the British had given to the concept of *fonds*.⁹ But Dr. Buck departed somewhat from the British definition:

I would be inclined to use the word *fonds* if it had a clear-cut meaning, but it seems to me that it does not. What I am proposing is a grouping of material in which consideration would be given not only to the principle of provenance but also to convenience in arrangement and description.

Here we have essentially the definition of record group as finally adopted (see below); and perhaps such perspicacity on Dr. Buck's part deprives our story of a dramatic buildup. This acuity, however, was merely intelligent guesswork at this stage: Dr. Buck had no way of knowing whether or not his idea would work out in practice. And he continued:

According to the English concept of *fonds*, which Jenkinson translates as "archival group," we would have to say that all the records of the Department of Interior constitute a single *fonds*. I think it would be more convenient for our purpose to consider the records of the Office of Indian Affairs as a *fonds* or archival group.¹⁰

Dr. Buck's statements clearly indicate that our record group system was not a radical departure from existing archival concepts but

⁸ Memorandum A-122 cites titles rather than names; none of these titles, however, exists any longer.

⁹ Minutes of meeting of the Finding Mediums Committee, Mar. 25, 1940.

¹⁰ Minutes of meeting of the Finding Mediums Committee, Mar. 25, 1940.

rather an adaptation of a European concept. The concept of *fonds* can be applied to any level of the administrative hierarchy. What was original in the concept of record group, as presented by Dr. Buck, was the very confession of vagueness, of arbitrariness; and the word "arbitrary" would become part of the definition. The concept of record group was conceived by a sincere archivist.

Although the committee seems to have hit on the right solution from the start, certain difficulties remained. Dr. Posner, in a later meeting of the committee, was asked to give his views. He discussed, among other things, symbols used in German archives for designating *fonds*. It occurred to some members of the committee that the fact that bureaus, in the United States Government, are often transferred from one department to another might create difficulties in assigning symbols. Dr. Irvine remarked:

That problem does not exist if the notion of having classification symbols reflect total Government organization is discarded. If you call it the Indian Office, and let it go at that, you can shift the records without difficulty.¹¹

But most members of the committee took it for granted that symbols were essential. Dr. Buck, although believing that meaningful symbols would be nice, suggested a third alternative:

Simply number each *fonds* with a number in a continuous series, assigning a number somewhat as we assign our accession numbers, by assigning the next number in the series to the first lot of material that belongs in that particular *fonds*, then, when additional material belonging to that *fonds* is received, it receives the same number, but that number signifies only when the first group was received in the establishment and not anything as to the logical relationship between various *fonds*.¹²

In fewer words, record groups would be numbered simply in the order of accession of the first lot belonging to that record group. This was the system finally adopted.

The idea of collective groups of records was also aired in the course of the meetings of the committee. It was suggested, for instance, that the records of American consulates and embassies be assembled into a collective record group (although, as we shall see, here again there were alternative solutions).¹³ A year later, Dr. Buck intimated that "records of field offices may be grouped to-

¹¹ Minutes of meeting of the Finding Mediums Committee, Apr. 5, 1940.

¹² Minutes of meeting of the Finding Mediums Committee, May 5, 1940.

¹³ Minutes of meeting of the Finding Mediums Committee, July 17, 1940.

gether when questions of bulk and convenience justify this.”¹⁴ It was also suggested that the records of agencies with related functions be grouped together.

In February 1941 Dr. Connor, still Archivist of the United States, issued a memorandum based on the recommendations of the Finding Mediums Committee.¹⁵ The recommendations themselves had been embodied in a final report filed with the Director of Archival Services on January 15, 1941.¹⁶ The memorandum enunciated the general principles of the concept of record group. Section 4 of the memorandum declared, among other things, that cataloging by record groups would replace cataloging by accessions (the Division of Cataloging was still in operation). The record group was defined as “a major archival unit established somewhat arbitrarily with a due regard for provenance and to the desirability of making the unit of convenient size and character for the work of arrangement and description and for the publication of inventories.” Section 5 of the memorandum directed the Division of Research and Records Description to proceed with tentative identifications and registrations of record groups. Section 15 established an Advisory Committee on Finding Mediums, presumably meant to supersede the Finding Mediums Committee. Mr. Price, Dr. Buck, and Dr. Hamer were appointed to it; in addition, there were two newcomers, Oliver W. Holmes and Paul Lewinson. The principles of the concept of record group having been outlined and accepted by the Archivist, it was time for their application.

The minutes of the Advisory Committee on Finding Mediums were sporadically kept; in any case, the concept of record group ceased to be a primary concern. At its first meeting, it is true, Dr. Buck rehearsed his ideas concerning record groups, or “archival groups” as he still called them; he insisted, “. . . we have to know what an archival group is before making a preliminary checklist.”¹⁷ From then on record groups are mentioned only incidentally in the records of this committee.

More important than the activities of this “advisory” committee, at least with regard to our topic, were the activities of the Director

¹⁴ Minutes of meeting of the Advisory Committee on Finding Mediums, Mar. 25, 1941.

¹⁵ Memorandum A-142, Feb. 28, 1941.

¹⁶ The author has not been able to find a copy of this report. Nor do any of the records used bear on the events and the discussions that may have taken place in the committee between August 1940 and January 1941; but, then, no student of history ever finds all the pertinent data.

¹⁷ Minutes of meeting of the Advisory Committee on Finding Mediums, Mar. 25, 1941.

of the Division of Research and Records Description, Dr. Holmes. Section 5 of Memorandum A-142 burdened him with the task of registering record groups. These registrations were intended to serve as an administrative control over, and a general guide to, the holdings of the National Archives. They were to be made available immediately upon the accession of a record group or part of a record group. Even so, a tentative list of record groups was prerequisite. Memorandum A-206¹⁸ merely confirmed instructions in this regard contained in Memorandum A-142. In October 1942 Dr. Holmes could announce that 109 registrations were "in"; naturally, registered record groups were already identified. He also predicted that the total number of record groups would not exceed 200—an accurate estimate at the time.¹⁹ On June 30, 1944, Dr. Holmes submitted a "Report of Recommendations on the Subject: Identification and Numbering of Tentative Record Groups." This report impressed Dr. Irvine as the "unusually thorough job one would expect from RD [Records Description]."²⁰ This thoroughness may explain in part the long delay: more than 3 years had passed since the issuance of Memorandum A-142. Furthermore, these were the war years when the National Archives carried on its duties with a reduced staff. But the most obvious excuse for the delay was the difficulty of the task.

As far as the procedure can be reconstructed, each custodial division submitted a list of proposed record groups with justifications and a statement on their coverage. Dr. Holmes and his division elaborated on the justifications, added information, made changes. The corrected drafts were then reevaluated by the custodial divisions. The divisions concurred or dissented, and Dr. Holmes revised or did not revise the justifications and statements. (It should be noted that the justifications and statements were not identical with the registrations; and many of these "tentative record groups" required little or no justification—there being no grounds for controversy.) One must assume, of course, that the determination of many record groups involved considerable parley between Dr. Holmes and the chiefs of the custodial divisions.

The difficulty of the task derived from the admitted arbitrariness of the concept of record group. The matter of collective record groups was heatedly (by archival standards) discussed. For instance, were the "field" records of the Department of State to be

¹⁸ Issued on Oct. 7, 1942.

¹⁹ Minutes of meeting of the Advisory Committee on Finding Mediums, Oct. 7, 1942. Initially there were 190 record groups.

²⁰ Endorsement of the "Report."

considered as one record group? Should the records of each embassy and each consulate, all *fonds*-creating agencies, be considered as a separate record group? Or should the records of the embassy and consulates in each country be considered as a collective record group?²¹ There were other types of problems. Were the records of the United States Pacific Railroad Commission, a Congressional commission whose records had been in the custody of the Department of Interior, a separate record group? Dr. Buck gave four reasons against it: (1) there was but a small quantity of records; (2) the records were those of a temporary agency; (3) the activities of the Pacific Railroad Commission were related to those of the Commissioner of Railroads in the Department of Interior; (4) the records had been deposited with the Commissioner for possible reference use. These arguments, if taken individually, may not have convinced the committee. Dr. Hamer retorted that the quantity of records should not be taken as a criterion; it really did not matter how many record groups there were to be—there might as well be a thousand. At any rate, in both these instances, the final decisions were “somewhat arbitrary.” The principle upon which both questions were decided was expressed in Memorandum A-206:²² in case of doubt the record groups should be made more inclusive, so that they might be broken down later if warranted.

Consequently, the justifications adduced in Dr. Holmes’ “Report” are, at times, vague. An example: “. . . these records are of sufficient importance and magnitude, as well as separate enough in character, to deserve their own record group” How important need they be, and how separate? Yet the record groups identified in the “Report” and described in the first registrations were seldom changed or regrouped in the course of 20 years. The registration of a record group was revised whenever an accession of records belonging to that record was made; this revision usually meant that a paragraph or more was added to the existing description. The concept of record group itself underwent no revisions. Although no one seems to have an exact idea of what constituted or should constitute a record group, a general consensus, a kind of tacit understanding, did and does exist. Hence the concept of record group has little or no history since its inception.

The “Report” submitted by Dr. Holmes “recognized that no scheme based upon precedence or hierarchical considerations could

²¹ Minutes of meeting of the Advisory Committee on Finding Mediums, June 4, 1941.

²² Oct. 7, 1942.

be carried through consistently . . .";²³ therefore, one must presume, the process of numbering record groups in the order of their accession is justified. (As we shall see, even this system, if it may be called that, has not been adhered to recently.) The 1948 *Guide to the Records in the National Archives* discusses each record group in the same numerical order. The scholar asked to review the *Guide* for the *American Archivist* seems to have been not a little disconcerted by the process:

. . . the arrangement of the new *Guide* cannot be described as anything but a national misfortune. . . . These are the records of the United States Government, and if there is any method of describing them that puts the Government's worst foot forward, emphasizes its disorganization and incoherence, presents it as a chaos and not a cosmos, and lets unregenerate bureaucracy rage—this is it! Appendix D, a "classified List of Record Groups," "arranged according to a combination of hierarchical and other relationships," is offered "for the convenience of persons who may have use for it." If the Constitution means anything, if there is such a thing as a national administration, if time continues to flow and deposit history, everybody ought to have use for it!²⁴

Archivists generally believe that the arrangement of series within a record group reflects to some extent the organization and even the history of the agency that created the records; and they believe, therefore, that this arrangement ought not be disturbed. According to the concept of a unique *fonds*—a Russian concept to which the Archivist of the United States paid homage in 1947²⁵—all the records of a government are but one *fonds*. It would follow, then, that the organization of the records of the United States Government reflects to some extent the organization and history of that Government. But the records in the National Archives reflect no such thing. The records, as we have seen, have been shuffled, both physically and on paper.

Indeed, it does not seem possible to number record groups in a logical pattern. Bureaus are shifted from one department to another, or their functions change. Even an alphabetical order for record groups does not seem feasible, for bureaus are frequently redesignated. But why are symbols necessary at all?

The numerical symbols designating record groups in the National Archives have little practical value. Today there are some 350

²³ Oliver W. Holmes, "Report of Recommendations on the Subject: Identification and Numbering of Tentative Record Groups," June 30, 1944.

²⁴ Donald H. Mugridge, in *American Archivist*, 12:418 (Oct. 1949).

²⁵ S. J. Buck, "The Archivist's 'One World,'" in *American Archivist*, 10:11 (Jan. 1947).

record groups. It is hardly possible to remember the meaning of 350 symbols without considerable practice; archivists with long experience in the National Archives recall the meaning of the symbols of only the most important record groups or those with which they deal most frequently. Not only *vis-à-vis* the public, but *vis-à-vis* their colleagues in the National Archives, in most internal transactions, archivists are compelled to mention the title of the record group along with its numerical symbol in order to be understood. Does the numbering system save time for clerical personnel? In but a few instances. The labels on each container in the stacks of the National Archives bear, or are expected to bear, both the number and the title of the record group to which the records in the container belong.

The symbols designating record groups in the National Archives are somewhat confusing. The highest record group number in the National Archives is 366; this does not signify that there are 366 record groups in the National Archives, for there remain unassigned the numbers for records that once have been independent but which now are incorporated with other record groups. (In 1942 Dr. Buck insisted that record groups should be made more inclusive in case of doubt, to prevent eventual gaps in the numbering system. Today we have gaps in the numbering system. Of course, the unassigned numbers could have been assigned to new record groups; this was not done to prevent possible "confusion.") Some numbers have been assigned to record groups of which there are no records in the National Archives, in part to satisfy control requirements of the Federal Records Centers. Thus, not only are the record group numbers no indication of the number of record groups in the National Archives, but the record group numbers no longer indicate the sequence of accessions, as they were intended to do.

At the present rate of increase, by 1980 there could be about 500 record groups. As Almon Wright, then Director of the Division of State Department Archives, declared in 1944, "what matter is it if we have 300 record groups or 1,000 since, in the course of the next fifty years, these numbers will be dwarfed in any case."²⁶ If the numerical symbols were discarded there would be no need to worry about the quantity of record groups, and it would be fairly simple to arrange them in a meaningful pattern, if only for the sake of mental control. The Archives of the State of Maryland, the Hall of Records, never bothered to assign symbols to its holdings.

²⁶ Appendix B to Dr. Holmes' "Report."

The Public Record Office in Great Britain uses meaningful abbreviations.²⁷ Many archives resort to some mnemonic device.

Record groups were established "with due regard . . . to the desirability of making the unit of convenient size and character for the work of arrangement and description and for the publication of inventories." It may be difficult to determine what is and what is not of convenient "character," but "size" is evidently measurable. According to the Staff Information Circular on record groups, "The size of a body of records is of importance in determining whether it should be established as a record group, as two or more record groups, or as a part or subgroup of a record group."²⁸ Nevertheless, one wonders whether considerations of size have not been entirely neglected in setting up certain record groups in the National Archives. The size of record groups ranges from a "negligible" number of cu. ft. (less than 1 ft., as, for instance, the records of the Farmer Cooperative Service) to 76,278 cu. ft. (Records of the Veterans Administration). It may be argued, in the case of the records of the Farmer Cooperative Service, that not all its records of permanent value have been accessioned. Then we could mention the defunct Price Decontrol Board (9 cu. ft.), the records of which, except for the personnel records, have either been disposed of or accessioned by the National Archives. Nor are these extremes freak record groups: the 350-odd record groups cover the entire range. The circular does not indicate what should be considered an ideal size for a record group. Is it closer to 9 cu. ft. or to 76,278? Does character, perhaps, compensate for a lack of volume?

The very definition of the record group concept is a curious one. It is certainly not a definition designed to enlighten the general public or even scholars. The well-informed scholar might understand the meaning of "provenance" but unless he is also an archivist he could never guess what is meant by "convenient size and character." Archivists themselves do not seem to agree on what should be considered "convenient" for the sake of arrangement, description, and the publication of inventories. The preparation of a preliminary inventory of the Records of the Bureau of Indian Affairs required almost 3 years, whereas the preparation of the same type of inventory for the Records of the Indian Claims Commission took 2 days. Of course, the size and character of these record groups

²⁷ CCC for both Civilian Conservation Corps and Commodity Credit Corporation, however, would be confusing.

²⁸ *The Control of Records at the Record Group Level*, National Archives Staff Information Circular no. 15, p. 3 (July 1950).

affected the inventorying process. But which of these time periods was "convenient"?

Indeed, a number of questions may be raised concerning the concept of record group as applied in the National Archives. One may wonder, for instance, why it is necessary to use the word "Records" in the title of almost every record group; Dr. Buck, when this question was raised, simply answered, "... we want to state that these are records."²⁹ Can a better reason be adduced? Nevertheless, the concept of record group, as elaborated by Dr. Buck, has survived for more than 20 years. No one has been able to devise a better system for the records in the National Archives. More precisely, it has occurred to no one to devise a better system. Perhaps there is no need for it. It would be well, however, to subject the concept now, after more than 20 years of experience, to some revision and clarification.

²⁹ Minutes of meeting of the Advisory Committee on Finding Mediums, June 4, 1941.

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