

## Research Article

# “Imponderable Matters:” The Influence of New Trends in History on Appraisal at the National Archives

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**Abstract:** The field of history has changed a great deal since Theodore Schellenberg wrote *The Appraisal of Modern Public Records* in 1956. Although trends in social history, Afro-American history, and women's history have suggested new subjects, themes, and periodization for historians during the last twenty years, archivists at the National Archives and Records Administration continue to rely primarily on Schellenberg's guidance in their appraisal of the records of the federal government. The author investigates the criteria used in making appraisal decisions at NARA, looks at some examples of appraisals that considered the new trends in history to greater and lesser extents, and concludes that NARA must take a proactive position on this issue to ensure that tomorrow's archival collection is a well-considered and useful one.

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IN 1956, WHEN THEODORE Schellenberg wrote the classic archival statement, *The Appraisal of Modern Public Records*, the methodology and subject content—if not the interpretation—of the field of history had remained relatively consistent for nearly half a century. Therefore, when he argued that in order to assess the historical value of records the appraiser “must take into account the entire documentation of society on the matter to which the information relates,” one can assume he meant that the appraiser needed to consider all areas deemed of value by the traditional historian.<sup>1</sup> Although maintaining familiarity with the political, economic, and military events of history and the activities of America’s leaders and elites was a formidable task, the appraiser of 1956 had the advantage of operating within a field with established periodization, themes, and priorities.

Not long after Schellenberg published his article, the field of history began to change in ways that had profound implications for archivists. Rather than focusing on great men and great events, what came to be known as the new social history concentrated on ordinary people in groups, on changes in their environment, customs, values, status, and economic well-being over time, and on the institutions they created.<sup>2</sup> The fields of women’s history, Afro-American history, and labor history suggested not only new themes for the historian, but the need for revised periodization and reassessment of established themes as well.<sup>3</sup>

Because records generally are created by or about elites, the new fields of history prompted historians to look for new kinds of records and to find creative uses for traditional records. Advances in technology made the increased usage of manipulable raw data more feasible.

As archivist Dale Mayer has pointed out, the implications of these new fields of history for archivists are two-fold: first, social history, women’s history, and Afro-American history suggest new ways to use materials that were previously thought to be of minimal value. Secondly, the rapid rate at which still newer fields of history and technology are evolving raises “the very distinct possibility that uses may be found in the near future for materials that were previously destroyed as entirely useless to anyone.”<sup>4</sup> This essay will discuss the appraisal of records at the National Archives and Records Administration (NARA) in light of the recent research trends in the historical profession. By reviewing NARA’s current practices, and then considering the literature regarding the archivist’s responsibilities to the documentation of society, we may place the appraisal policies of the National Archives in the wider context of archival responsibility to history. The essay concludes with a variety of suggestions for assuring that the records required by practitioners of these recent trends in history are adequately preserved at the National Archives.

### Modern Public Records

Although the possibility of finding future uses for records presently considered to be useless might suggest that the National Archives simply should save everything, those

<sup>1</sup>Theodore Schellenberg, *The Appraisal of Modern Public Records* (National Archives Bulletin #8, 1956), 277; also reprinted in Maygene Daniels and Timothy Walch, eds., *A Modern Archives Reader: Basic Readings on Archival Theory and Practice* (Washington, DC: NARS, 1984).

<sup>2</sup>Dale C. Mayer, “The New Social History: Implications for Archivists,” *American Archivist* 48 (Fall 1985): 390.

<sup>3</sup>Gerda Lerner, “Placing Women in History: A 1975 Perspective,” in Bernice A. Carroll, ed., *Liberalizing Women’s History: Theoretical and Critical Essays* (Chicago: University of Illinois Press, 1976), 362.

<sup>4</sup>Mayer, “The New Social History,” 394. See also Frederic Miller, “Social History and Archival Practice,” *American Archivist* 44 (Spring 1981): 113-24; and Miller, “Use, Appraisal, and Research: A Case Study of Social History,” *American Archivist* 49 (Fall 1986): 371-92.

familiar with modern public records know that saving all federal records is neither possible nor desirable.<sup>5</sup> The federal government created more records every four months in the early 1980s than it did between the administrations of George Washington and Woodrow Wilson. The problems with modern records result not just from bulk, but from redundancy, missing personal data, impermanence of form, and the prohibitive expense of processing due to all of these factors.<sup>6</sup> The proliferation of electronic records over the past twenty years has created additional problems for archivists. The *General Records Schedules*, a NARA guide providing disposition standards for records common to most federal agencies, offers a glimpse into the vast amount of routine administrative paperwork created by the U.S. government.<sup>7</sup> Even the most innovative historian would probably sanction the disposal of most records relating to payroll, leave and attendance, procurement, property disposal, travel, motor vehicle maintenance, and duplication and binding. As Schellenberg wrote, no government can afford to save all of its records; neither can a researcher afford the time to sift through such volume.<sup>8</sup>

Clearly then, the process of selecting those few records to be retained permanently, generally less than one percent of the total, is of critical importance to future developments in historical method and interpretation. Archivist Maynard Brichford wrote, "Appraisal is the area of the greatest

professional challenge to the archivist. In an existential context, the archivist bears responsibility for deciding which aspects of society and which specific activities should be documented in the records retained for future use. Research may be paralyzed by unwitting destruction or by preserving too much."<sup>9</sup>

### Appraisal at the National Archives and Records Administration

Unlike many smaller institutions, the National Archives does not have a unified retention or collections policy. The staff relies primarily on Schellenberg's *Appraisal of Modern Public Records* for theoretical guidance, assessing the worth of records in terms of evidential and informational values.<sup>10</sup> *Evidential value* refers to information in records that provides "evidence" of the organization and functions of the government agency that produced them. Schellenberg described the test for assessing evidential value as follows:

The test of evidential value is a practical one. It involves an objective approach that the modern archivist is especially trained to take; for his training in historical methodology has taught him to look into the origin, development, and the working of human institutions and to use records for the purpose. The test is not easy, but it is definite. It will bring to

<sup>5</sup>Eva Moseley discusses the call for, and the problems with, "saving everything" in "Sources for the 'New Women's History,'" *American Archivist* 43 (Spring 1980): 187.

<sup>6</sup>F. Gerald Ham, "Archival Choices: Managing the Historical Record in an Age of Abundance," in Nancy Peace, ed., *Archival Choices: Managing the Historical Record in an Age of Abundance* (Lexington, MA: Lexington Books, 1984), 133.

<sup>7</sup>National Archives and Records Administration, *The General Records Schedules*, 1988.

<sup>8</sup>Schellenberg, "The Appraisal of Modern Public Records," 237.

<sup>9</sup>Maynard J. Brichford, *Archives and Manuscripts: Appraisal and Accessioning* (Chicago: Society of American Archivists Basic Manual Series, 1977), 1.

<sup>10</sup>The NARA *Records Appraisal and Disposition Procedure Manual* (NARA, 30 January 1987) contains the following paragraph summarizing, but not citing, Schellenberg as the basic theory behind appraisal at NARA: "7.a.(1). Records are appraised to determine if they warrant archival preservation by evaluating evidential and informational values, as described in NARA publications and internal directives. In general, permanent records include those that document the basic functions, policies, organization, and major activities of Federal agencies, and records having significant informational value, meeting the tests of uniqueness, form, and importance."

view first the records on which judgment of value can be made with some degree of assurance, the degree depending upon the thoroughness with which the records have been analyzed. It can be applied by all archivists, for no archivist is likely to question that evidence of every agency's organization and functioning should be preserved.<sup>11</sup>

Most appraisers at NARA agree that their primary responsibility is to preserve the records documenting the purposes, policies, and organization of the agencies of the federal government; generally, records with evidential value document the activities of the top levels of an agency's administrative hierarchy.

According to Schellenberg, records with *informational value* should be preserved because of the information they contain relating to persons, corporate bodies, things, problems, and conditions with which the creating government agency dealt. While evidential value is relatively easy to assess, "The test of research values, on the other hand, brings to view records on which judgments are bound to differ widely."<sup>12</sup> His first two criteria for determining informational value were straight-forward: Is the information contained in the records unique? Is the information in a usable form? It is the third criterion of "importance" that Schellenberg believed was more difficult to apply. "The test of importance relates," he wrote, "to imponderable matters—to matters that cannot be appraised with any real certainty."<sup>13</sup> Because it was the least "scientific" criterion, Schellenberg believed "importance" should be considered after all other tests had been applied. The current proliferation of electronic records challenges traditional appraisal criteria however, as these records consist almost

exclusively of informational data; in the case of electronic records, "usability" and "importance" become key appraisal factors.

In addition to Schellenberg's criteria of evidential and informational values, appraisers at the National Archives sometimes take external factors into account when appraising the records of the federal government. As G. Philip Bauer pointed out in 1946 and Leonard Rapport reiterated in 1981, cost concerns are always present in the government, and it is necessary to consider whether the public benefit to be derived from saving public records is sufficient to offset the necessary expenditure of public money.<sup>14</sup> Such considerations seem to be especially prevalent when very large series of records (e.g., case files) are under consideration.

The general guidance provided by Schellenberg, Brichford, Bauer, Rapport, and other archival theorists is useful in providing a conceptual framework of sorts. By applying the test of evidential value first and then assessing informational value, NARA appraisers create a hierarchy of value in which records of top government officials and offices achieve greatest importance. The records of lower offices, the data collected by agencies, and the products produced by government employees then are assessed in terms of their impact on high-level policy-making, and finally in terms of their overall impact on, or reflection of, society. Clearly these guidelines leave a great deal of the specifics of interpretation and application to the individual appraiser. Since most archivists agree that the determination of evidential value is a relatively straight-forward process, it is in the area of assessing informational value

<sup>11</sup>Schellenberg, *The Appraisal of Modern Public Records*, 8.

<sup>12</sup>*Ibid.*

<sup>13</sup>*Ibid.*, 26-27.

<sup>14</sup>G. Philip Bauer, *The Appraisal of Current and Recent Records*, National Archives Staff Information Circular #13, June 1946; Leonard Rapport, "No Grandfather Clause: Reappraising Accessioned Records," *American Archivist* 44 (Spring 1981): 143-50.

that the training and philosophies of the individual appraisal archivist have the most potential influence. Appraisal and Disposition Division Director Ken Rossman referred to this area of appraisal in particular, when he pointed out that appraisal is an art, rather than a science.<sup>15</sup>

At the National Archives, fifteen people appraise the records of 123 federal agencies. Generally, NARA appraisers hold graduate degrees in American history. Each has individual specialties and interests in fields of history that may or may not relate to the agency whose records she or he is assigned to appraise. Sometimes the area of expertise correlates precisely with the assigned agency, as in the case of the State Department appraiser trained in the history of foreign policy. Sometimes the appraiser's field of interest transcends agency assignments, as is the case with those archivists interested in women's history and Afro-American history. Most appraisal archivists at the National Archives agree that one's area of specialty or interest definitely influences the assessment of the historical value of federal records.<sup>16</sup> Familiarity with key events in the labor movement, for example, may give an entirely different meaning to the records of the Department of Labor at a given time. On a more subtle level, subject-matter expertise may allow an appraiser or historian to read even further between the lines. Wilda Willis, an appraisal archivist particularly sensitive to issues of Afro-American history, points out that her specialty allows her to understand a body of records in terms of minority issues, whether or not issues of race or eth-

nicity are clearly present in the records.<sup>17</sup> In other words, for Afro-American history, she believes it is often important to understand what the absence of Afro-American people and issues means about a set of records. It is unlikely that appraisal archivists not specifically attuned to the field would have a similar understanding of such subtleties.

Although the archivists at the National Archives occasionally confer with one another informally when they recognize potential informational value in a historical field with which they are less familiar, there is no formal mechanism for sharing expertise among the staff. For the most part, appraisal archivists believe they are evaluated on the number of items or series they schedule for disposal or permanent retention, and the perceived emphasis on production numbers does not encourage informal information sharing either. There has been talk about increasing team appraisals, one result of which would be a pooling of expertise. Currently, however, the team approach is unusual.

Despite the potential for inconsistency and variety in the assessment of the informational value of federal records, most appraisers at the National Archives believe that NARA is successfully saving most of the records that it should.<sup>18</sup> In other words, although the appraisers may be approaching the records from different specialties, for the most part they are arriving at the same conclusions. Several archivists point to the review process, where the appraisal report is read and considered by the appraisal management staff and the records projects management staff before any action is taken, as a system of checks and balances that potentially safeguards the records. One NARA appraisal archivist wrote,

<sup>15</sup>Interview with Ken Rossman, Director, Appraisal and Disposition Division, 16 March 1989.

<sup>16</sup>Based on interviews with the following staff members of the NARA Appraisal and Disposition Division: Jimmy Harrison, 27 February 1989; David Langbart, 24 March 1989; Richard Marcus, 28 March 1989; Michael Miller, 28 March 1989; Ken Rossman, 16 March 1989; Wilda Willis, 13 March 1989; Jeanne Young, 21 March 1989.

<sup>17</sup>Interview with Willis.

<sup>18</sup>Interviews with Marcus, Miller, Rossman, Willis, Young.



"Having been involved in federal records disposition activities for the past six years, . . . I believe NARS has made every attempt to retain records with values sufficient to warrant retaining—for the historian, the citizen, and the government."<sup>19</sup>

### NARA Appraisals and the New Social History

It is difficult to determine in any quantitative manner whether NARA's appraisers are correct in their assertion that all of the "good" records of the federal government are saved. The method of recording appraisal decisions has changed over time, as has the quality of individual series of records, making comparisons across time nearly impossible. Perhaps the greatest impediment to this type of analysis stems from the observer's complete reliance upon the word of the appraisal archivist for what was contained in the records. While the archivist of 1960 may have disposed of records containing a wealth of information relating to women's history because he or she was not attuned to women's issues, our only knowledge of the content of those records today is dependent on the way the appraiser viewed them then—it is unlikely that the appraisal report would have mentioned women at all. We cannot often read that far between the lines.

Nevertheless, it is relatively easy to point to examples of records appraisals that clearly were influenced by the recent developments in history. In 1972, a NARA archivist appraised 220 cubic feet of cost-of-living schedules created by the Bureau of Labor Statistics as follows:

According to the Bureau of Labor Statistics, these records contain unpublished information which has considerable eco-

nomics research potential. In addition to their importance to economists, these records have other values. The correlation of foods, eating habits, height, weight, activity, etc. of persons of varying races, religions, ages, and geographical locations during the depression years of 1935-1936, will be of considerable interest.<sup>20</sup>

The records were determined to have permanent value.

In 1985, another appraiser described records of the Advisory Committee of the Arts, U.S. Information Agency, as permanent because the committee obviously avoided accepting Afro-American performers for its cultural exchanges, or sending American performers to developing countries until the mid-1960s. She wrote,

The minutes provide documentation on one aspect of American foreign policy. Scholars can use the minutes to gauge the effectiveness and impact of the U.S. international programs. Scholars can also interpret the Committee's criteria used in selecting performers and the countries in which they performed. The minutes will also reveal which countries participated in the program and can be used in evaluating propaganda aspects of the cultural programs.<sup>21</sup>

A particularly dramatic example of the influence of the study of women's history is evident in the disposition of the records of the U.S. Cadet Nurse Corps of the Public Health Service. In 1961, a National Archives appraisal suggested that the bulk of these World War II-era records was disposable because "interest for purposes of research and/or functional demonstration in

<sup>19</sup>James Gregory Bradsher, "When One Percent Means A Lot: The Percentage of Permanent Records in the National Archives," *Organization of American Historians Newsletter*, May 1985.

<sup>20</sup>Maida Loescher, "Appraisal Report for records of the Bureau of Labor Statistics, RG 257," 15 June 1972. I am grateful to Henry Wolfinger, Appraisal and Disposition Division, for this example.

<sup>21</sup>Wilda Willis, "Appraisal Report (NC3-306-81-6) for records of the U.S. Information Agency, RG 306," 5 November 1985.

the details of the hundreds of individual cases comprising this series is unlikely."<sup>22</sup> Because the appraisal archivist recommended that the records be saved as long as the members of the Cadet Corps remained alive, the records were still on the shelves of the Records Center in 1984 when a doctoral candidate wrote and inquired about their existence. In 1988, the records were reappraised and the majority deemed permanent as documentation of a "significant Federal program."<sup>23</sup>

By most standards, the Federal Bureau of Investigation appraisal project was a model appraisal, and consideration of social history implications figured prominently in the project. Prompted by a lawsuit, NARA committed seventeen staff members to evaluate and assess twenty-five million FBI case files. The team began by attempting to apply the traditional tests of evidential and informational values and quickly realized that "the application of these traditional archival standards . . . to the FBI's case files required the development of criteria for research potential that could be used in a uniform manner to evaluate all case files reviewed during the course of the appraisal. Four levels of research value were established for use by the task force members: high, medium, low, and none."<sup>24</sup>

To ensure uniform determination of research value, each team member received a detailed set of instructions for choosing a level of value. Each sampled case file had to be investigated for information relating

to the following issues: perpetrator's sex, race, and ethnicity, other issues of race and ethnicity, family, medicine, social/moral attitudes, women, labor, criminal/justice, economics/business/agriculture, international relations, the law, politics, and regional patterns. In order to ensure that it successfully identified most of the files with research value, the task force also created computer profiles for each subject classification with varying retention periods depending on the informational value of the particular crime, took a statistical sample of all FBI records to preserve evidence of the "typical" file, and developed a list of exceptional cases to be saved.

Although the FBI appraisal report was one of the most thorough jobs of considering new and potential trends in history, it was also, as Leonard Rapport wrote, "the most expensive appraisal project in the history of the world."<sup>25</sup> Clearly its novel uses of statistical sampling, random sampling, and research value checklists have implications for current and future appraisals. In fact, both branch chiefs of the Appraisal and Disposition Division served on the task force and consider the team's approach as a useful model, particularly for dealing with case files. However, if the staffing pattern remains the same, such thorough appraisals are impossible. Consequently, decisions on case files from a variety of agencies are being deferred. It does not bode well that it took seventeen people, more than the entire appraisal staff, to create an adequate appraisal of the records of the Federal Bureau of Investigation with regard to current research demands.

In 1984, NARA archivist David Kepley predicted that "the impact of the reorientation [from traditional to new social history] on the appraisal of archives... promises

<sup>22</sup>Jerome Finster, "Appraisal Report (II-NN-3384) for records of the Public Health Service, RG 90," 28 August 1961.

<sup>23</sup>Janice Wiggins, "Appraisal Report (N1-090-88-4) for records of the Public Health Service, RG 90," 1 February 1988.

<sup>24</sup>National Archives and Records Service and the Federal Bureau of Investigation, *Appraisal of the Records of the Federal Bureau of Investigation, A Report to Honorable Harold H. Greene, United States District Court for the District of Columbia* (2 vols.; Washington: National Archives and Records Administration, 1981), 3-3.

<sup>25</sup>Leonard Rapport, "In the Valley of Decision: What to Do About the Multitude of Quasi Cases," *American Archivist* 48 (Spring 1985): 186.

to be wide-ranging and perhaps revolutionary.”<sup>26</sup> Clearly, there are examples of the NARA appraisal staff’s awareness of new trends in history. The FBI appraisal report even offers a prototype for the systematic consideration of issues of social history, women’s history, and Afro-American history in the appraisal of the federal records of the future. But one would have to characterize NARA’s response to this historical reorientation as piecemeal, rather than revolutionary. The fact that there is no official response at all, no statement of policy or even of recognition of the potential impact of the new trends in history, indicates that NARA does not intend to attack the issue actively. Although the NARA appraisal staff may argue that their evaluation of informational value allows them to assess records adequately in light of recent trends, the FBI appraisal report suggests that interpretations of informational value need to be systematized—from record to record and from archivist to archivist—to assure a more uniform appraisal of records.

### The Future of Social History and Appraisal

The archival literature suggests three approaches that archival institutions might take in order to contend with issues related to the needs of social historians in appraisal work. Gregory Stiverson presented the conservative view that archives should seek to maintain the status quo of circa 1960 as follows:

Conservatives believe that highlighting any particular group is wrong, because it distorts reality. We prefer selection procedures that will bring into our archives records that document all facets of our culture and the creation of comprehensive, rather than specialized, guides to those records. No amount of vocal-

izing by women, Afro-Americans, or other allegedly oppressed, ignored, or misunderstood segments of American society will change the fact that until the last few years our culture was indisputably dominated by white Protestant males, and in most respects it still is. More important, we archivists must not permit ourselves to compromise our principles by being forced to judge that particular groups have been wrongfully ignored in the past. We must eschew all attempts to force us to direct our scarce resources into enterprises designed to enhance the status of recently activated groups who demand that we archivists provide them with historical legitimacy.<sup>27</sup>

Stiverson’s approach offers limited possibilities for the National Archives, for NARA has already, if unofficially, taken steps toward recognition of changes in social history into its appraisals. (We will leave the issue of the historical legitimacy of minorities and women for another essay.) Despite the lack of an articulated plan to procure them, no one at the National Archives is openly denying that records relating to laborers, women, and minorities deserve space in NARA.

The middle ground, or reactive view, most closely approximates NARA’s current practices. According to F. Gerald Ham, most archives “react,” as far as they are able, to changes in research interests without attempting to anticipate trends. Ham explained the problems of this approach, which clearly have implications for NARA. “Small wonder, then,” he wrote, “that archival holdings too often reflected narrow research interests rather than the broad spectrum of human experience. If we cannot transcend these obstacles, then the archivist will remain at best nothing more

<sup>26</sup>David R. Kopley, “Sampling in Archives: A Review,” *American Archivist* 47 (Summer 1984): 239.

<sup>27</sup>Gregory Stiverson, “The Activist Archivist: A Conservative View,” *Georgia Archive* 5 (Winter 1977): 9-10.



than a weathervane moved by the changing winds of historiography."<sup>28</sup>

The third alternative approach is the proactive one. Ham, Mayer, Fredric Miller, and Patrick Quinn among others have argued that one lesson the archival profession should learn from social history is that far-reaching planning is essential.<sup>29</sup> By creating a systematic, comprehensive approach to records appraisal in order to document the widest activities of the government in society, rather than by attempting to predict new research trends, archives can prepare for future research demands. Ham argued that the bulk of records created in recent years makes such planning imperative. He wrote:

For too long, archival practices have followed the dictates of conventional wisdom and unexamined habit. The preservation demands of the modern records make following such dictates increasingly costly in real dollars. These are the overt costs. What of the hidden costs? The cost of foregone opportunities? The sacrifices made in pursuing less effective alternatives? In choosing options, archivists need to evaluate these opportunity costs, as economists call them. Wise choices will enable archivists to operate on what is called the production frontier, where they make optimal use of limited resources for greatest output.<sup>30</sup>

It appears that wise choices will require that NARA formulate an active approach for the future.

## The Possibilities

There are many ways that NARA, other institutions, and the historical community in general can work together to ensure that tomorrow's archival collection is a well-considered and useful one. NARA administrators might consider a variety of activities if and when they decide to formulate a proactive policy regarding records appraisals and new research trends.

The first issue to contend with, as many archivists have pointed out over time, is the retention policy. In 1946, G. Philip Bauer of the National Archives identified a pressing need for archivists to point to a "boldly conceived and clearly defined policy of selection..."<sup>31</sup> Thirty-seven years later, a National Archives and Records Service (NARS, now NARA) task force on the appraisal function concluded similarly that "NARS should develop a comprehensive retention policy. The policy should define the types of records and information that the National Archives seeks for accessioning. It would be the foundation for NARS's records appraisal and disposition policies."<sup>32</sup> The inability of the members of the FBI task force to assess informational value without a detailed statement of criteria also points to the need for a more formal appraisal statement for NARA generally. Most of the archival literature agrees that the overabundance of records, the scarcity of resources, and the development of new historical trends dictate the need for a more systematic, planned approach in the future. One archivist pointed out that the lack of comprehensive policy forces archivists to make critical choices in

<sup>28</sup>F. Gerald Ham, "The Archival Edge," *American Archivist* 38 (January 1975): 8.

<sup>29</sup>Mayer, "The New Social History," 398; Ham, "Archival Choices;" Miller, "Social History and Archival Practice;" Miller, "Use, Appraisal, and Research;" Patrick Quinn, "The Archivist as Activist," *Georgia Archive* 5 (Winter 1977): 25-35.

<sup>30</sup>Ham, "Archival Choices," 145.

<sup>31</sup>Bauer, "The Appraisal of Current and Recent Records," 2.

<sup>32</sup>"Appraisal and Disposition Policies in NARS: A Report and Recommendations to the Archivist of the United States on performance of the Appraisal and Disposition Functions in the National Archives and Records Service," November 1983, recommendation I.4.

“intellectual solitary confinement.”<sup>33</sup> A statement of policy and criteria also would provide evidence for concerned historians that their research interests were taken into account in every appraisal, and it would provide federal agencies with a better sense of what NARA sought in permanent records.

Obviously the drafting of a comprehensive retention statement would be difficult. The absence of such a policy, in part, is a result of the failure of interested parties to agree on its content. To say, as Linda Henry did, that archivists need to delineate a “universe of documentation” and then preserve a representative sample of it is one thing.<sup>34</sup> For a staff of NARA appraisers to reach consensus on the extent of the universe and then to agree on the content, form, and application of the new criteria is clearly another. The only aspect of this issue that NARA appraisal archivists seem to agree on is that any such policy must be extremely flexible. Many prefer the “checklist” format, like the one used in the FBI report, to a more definitive statement. Ken Rossman suggested that automating the appraisal process, which the Appraisal and Disposition Division hopes to do by the end of the 1990s, will allow a greater uniformity in appraisal decisions while still providing the flexibility required. Despite the difficulties and the disagreements, the issue of the lack of a NARA retention policy is one that has arisen numerous times in a variety of contexts and has obvious implications for the appraisal of records relating to new topics in history.

Another issue of concern for social historians dependent on archival research is the administrative designation of the appraisal function as a discrete entity, separate from other archival functions. Dale

Mayer argued that in addressing the issue of adequate documentation for “bottom-up” history, “archivists are obliged to examine all areas of archival practice and management for these areas are inextricably linked in a manner that is often highly interactive. For example, decisions made when appraising and arranging collections often have significant implications for subsequent activities such as description and reference.”<sup>35</sup> Fredric Miller pointed out that “revised criteria could apply not only to future acquisitions, but also to materials currently being received and processed, in which the potential research value for social history is obscured by traditional evaluation.”<sup>36</sup>

These archivists’ statements suggests two things. First, anyone examining NARA’s practices as they affect records relating to social history should consider the organizational placement of the appraisal function in an office separate from offices that control and use the records. Does this organization best facilitate the accessioning and maintenance of the records? Is the isolation of the appraisal archivist from the researcher and the expertise of the reference archivist a serious problem? Secondly, in developing a new retention policy NARA should consider the impact of new trends in history on all offices in order to develop a policy that addresses the records at all stages of their lifecycle.

On a less conceptual level, the amount of “art” that will always play a part in archival appraisal work suggests that NARA should seek to place its most experienced and well-rounded archivists in appraisal positions. At the same time, the agency should encourage current appraisal archivists to keep up with historical and related trends. Maynard Brichford argued that

<sup>33</sup>Ham, “The Archival Edge,” 13.

<sup>34</sup>Linda J. Henry, “Collecting Policies of Special Subject Repositories,” *American Archivist* 43 (Winter 1980): 58.

<sup>35</sup>Mayer, 389.

<sup>36</sup>Miller, “Social History and Archival Practice,” 119.

"successful appraisal is directly related to the archivist's primary role as a representative of the research community."<sup>37</sup> Tom Nesmith painted the archivist's role broadly:

Among the new challenges archivists have is to see how insights from other disciplines facilitate historical research in archives and to learn to draw upon a wider spectrum of historiography than was most highly valued when knowledge of political history written from the far narrower and much more familiar range of records... formed almost the entire basis of archival expertise.<sup>38</sup>

There are a variety of ways to ensure that appraisal archivists are up-to-date on research directions. NARA could encourage reading, stress and finance professional activities, develop a more formal mechanism or forum for sharing information amongst the staff, and encourage the hiring of archivists with extensive archival and historical experience.

The current efforts towards inter-institutional cooperation suggest exciting potential for streamlining and systematizing appraisals beyond agency boundaries. In 1988, NARA established the pilot Intergovernmental Records Project (IRP), which, inspired by the Seven States Project of the Research Libraries Group, sought to facilitate the exchange of information about federal records through records description in the Research Libraries Information Network (RLIN) national online database. The "Phase 1 Report" of the IRP concluded that "a national archival database is a uniquely powerful tool for the shaping of data about intergovernmental records, surpassing all current finding aid systems in inclusiveness and retrieval powers."<sup>39</sup>

The implications for appraisal are great. An information system containing national records scheduling information would facilitate comparative appraisals—allowing for systematized collection policies on a much broader scale, and preventing duplication of records series in different institutions. With a greater understanding of who collects what, the archival profession could assign responsibility for documenting different aspects of society to different institutions. David Bearman discusses the potential for this kind of cooperation in the Seven States Project: "One state could choose to keep physicians licenses for the first year of every decade, knowing that neighbor states are retaining such records for the third, fifth, seventh, and ninth years of each decade without any real loss of informational value if definitions of, and information about retention policies for, forms of material were shared between similar institutions."<sup>40</sup> Phase II of the Intergovernmental Records Project is currently underway, and a report will be issued in 1991.

There are other, less sweeping approaches, as well. The 1983 task force on appraisal suggested reappraising records when new information about records or research interests indicated "that a better appraisal is possible."<sup>41</sup> Several archivists and the FBI appraisal report point out the usefulness of applying creative sampling techniques to large series of records, particularly case files that cannot be saved in their entirety. Creative thinking in terms of potential applications for electronic records and the possibility of digitizing textual data for greater manipulability becomes more essential daily. User and/or citation studies

<sup>37</sup>Brichford, 13.

<sup>38</sup>Tom Nesmith, "Archives from the Bottom Up: Social History and Archival Scholarship," *Archivaria* 14 (Summer 1982): 8.

<sup>39</sup>"Intergovernmental Records Project Phase I Report," National Archives and Records Administration (Unpublished, July 1990), 9.

<sup>40</sup>David Bearman, "Archives and Manuscript Control with Bibliographic Utilities: Challenges and Opportunities," *American Archivist* 52 (Winter 1989): 34.

<sup>41</sup>"Appraisal and Disposition Policies in NARS," Recommendation III.8.

are frequently suggested in order to provide NARA with more detailed information about the current needs of researchers and the current uses of records. During the past year, NARA archivist Paul Conway has undertaken such a user study, and he plans to issue a report in the spring of 1991.

Finally, some of the responsibility for ensuring that the records necessary for preserving the history of women, Afro-American people, laborers, and other groups are preserved must fall outside of NARA on the historical community itself. Even the most informed staff cannot be omniscient, and limited resources and minimal staff will continue to hinder appraisal work in the foreseeable future. Therefore, NARA could encourage the historical community to protect its own interests by following NARA's disposition decisions through the *Federal Register*. In that way, historians could protest and reverse NARA's action, as in the unique FBI case, or could offer an alternative home for records determined to be of no use to NARA.<sup>42</sup>

## Conclusion

Realistically, there may be little opportunity for long-term theoretical planning in a federal bureaucracy whose stagnant resources must support the new Archives II facility, a new regional branch in Alaska, and an increased reference load. But as new research trends continue to call into question some of our basic archival principles, the National Archives should consider what it has to gain by attempting to plan a re-

sponse for the future, or conversely, what it has to lose by continuing to ignore the issues. By responding in an official and systematic way to the appraisal questions raised by the growing fields of non-traditional history, NARA can allay fears of an elitist bias in the archival record and potentially improve its relationship with the historical community. A clearly stated appraisal policy would assist federal records managers in their work. A greater understanding of the meaning and uses for records with informational value may help NARA appraisers begin to come to terms with the enormous volume of unscheduled electronic records. And it is possible that officially sanctioned discussions among appraisal archivists would lead to their increased awareness of new issues and an expansion of the breadth of records in the National Archives.

By continuing to respond to new research trends in a piecemeal fashion, NARA invites criticism from historians. Although NARA may be doing a sufficient job of preserving records of informational value, currently there is no way to prove it. And worse, by not officially acknowledging that the definition of historical importance has changed over the past twenty years, we may *not* be accessioning all of the records that we should. As the archives of the federal government, the first responsibility of NARA will always be the preservation of evidence of that government. But as historians shift their definitions of importance from the activities of leaders and elites to more universal activities, the National Archives and Records Administration needs to reassess its responsibilities for the preservation of records containing informational value—for the historical community and for society as a whole.

<sup>42</sup>Samuel P. Hays discusses the historian's responsibilities for the maintenance of an adequate historical record in "Manuscripts for Recent History: A Proposal for a New Approach," *Journal of American History* 77 (June 1990): 208-216.