Literature Survey

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Collection Policy or Documentation Strategy: Theory and Practice

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Abstract: Documentation strategy received a great deal of professional attention and interest during the 1980s. It appeared to provide a theoretical basis for the acquisition of primary source materials and suggested a number of specific methodologies. But are documentation strategies that different from collection development? A review of the archival literature over the past twenty years suggests that any difference may be more apparent than real.

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ARCHIVAL THEORY, IT SEEMS, always follows archival practice. This was documented by Richard Berner, in his ambitiously titled Archival Theory and Practice in the United States: A Historical Analysis, which showed how descriptive theory was based on descriptive practice. In an aside, Berner specifically excluded archival appraisal from his more general analysis, claiming it needed further development to become theory. Some of that development, particularly the rapidly expanding literature on documentation strategies, has since enhanced the discussion of appraisal practice and theory.

The distinction between traditional appraisal techniques and documentation strategies can be generally stated: appraisal refers to the evaluation of specific papers; a documentation strategy is applied more broadly. Richard Cox, however, has recently noted that documentation strategy is frequently and mistakenly considered a synonym for archival appraisal.2 At its best, documentation strategy places the acquisition of archival materials on a theoretical basis and suggests methodologies that extend the concept of collection development policies. A review of the archival literature reveals that traditional policies have not been greatly extended.

Genesis

Collection development is an idea borrowed fairly recently from the library literature. Jutta Reed-Scott and Faye Phillips have shown how library collection management ideas could be applied to archives.³ Both urge archivists to write out a

policy based on an analysis of the collection, a systematic plan for acquisitions, and coordination with—or at the very least, awareness of—the collecting plans of other repositories. Prior to collection development, manuscript curators tended to focus their collecting in specific geographic areas with a heavy concentration on the easily accessible elites.

During the early 1970s, Gould Colman and F. Gerald Ham were among the first to point out the inadequacies of this approach as it was practiced. Ham noted that selecting information for future research is the archivist's most "demanding task." Then he asked, "But why must we do it so badly?" Colman was particularly concerned that archivists were carefully preserving "unrepresentative indicators" of our past.⁴

Linda Henry built on this theme in her 1980 article on collecting policies of subject repositories, where she argued that all of society should be sampled and documented. She excoriated those curators who accepted materials passively and insisted that "research follows the records." In addition, she reiterated Ham and Colman when she identified the major fault with institutional collecting policies and archival practices: "They have defined them too broadly: anything and everything to do with their subject. But they have collected too narrowly: their vaults still bulge with papers of the elite."

¹Richard C. Berner, Archival Theory and Practice in the United States: A Historical Analysis (Seattle: University of Washington Press, 1983), 6-7.

²Richard J. Cox, "A Documentation Strategy Case Study: Western New York," *American Archivist* 52 (Spring 1989): 193.

³Jutta Reed-Scott, "Collection Management Strategies for Archivists," American Archivist 47 (Winter

^{1984): 24-29;} Faye Phillips, "Developing Collecting Policies for Manuscript Collections," American Archivist 47 (Winter 1984): 30-42. See also Mary Lynn McCree, "Good Sense and Good Judgment: Defining Collections and Collecting," Management of Archives and Manuscript Collections for Librarians (Chicago: Society of American Archivists, 1980), 21-33.

⁴F. Gerald Ham, "The Archival Edge," American Archivist 38 (January 1975): 5. Gould P. Colman, "Forum: Communications from Members," American Archivist 36 (July 1973): 484.

⁵Linda J. Henry, "Collecting Policies of Special-Subject Repositories," *American Archivist* 43 (Winter 1980): 58, 63.

The notion of the "activist archivist" was first expressed by the historian Howard Zinn at the 1970 meeting of the Society of American Archivists. Zinn pleaded with archivists to "take the trouble" to document "the lives, desires, needs of ordinary people."6 Patrick Quinn later recalled that attendees at the 1970 meeting agreed on the need for archivists to collect "documentation pertaining to women, Blacks, and other minorities and the working class."7 These trends culminated in an often-overlooked group of articles on ethnic collections in America, published in a special issue (vol. 48, no. 3) of the American Archivist in 1985. Most of the institutions represented were those identified by Linda Henry as "special-subject repositories," i.e., those with a singular, rather than general mission. Each had established and successfully used activist collecting policies in its respective area of interest.

Earlier, however, Andrea Hinding had made perhaps the best case for an even broader collecting role for archivists. Responding to Zinn's plea, she offered a model for "conscious, systematic documentation of some aspect of culture or experience. In order to document a phenomenon properly, whether it be social welfare or the state of Montana, the curator must understand it fully—define it in all its complexity—and select for preservation material that records both its significant and representative features." She specifically used the term documentation strategies, which, combined with coordinated collecting, offers "a means for keepers of records to increase such efforts while still being able to handle the bulk of contemporary collections."8

Without offering a precise definition, Hinding indicated that documentation strategies means "asking simply, what is the total amount of information being generated and how are archivists and manuscript curators to determine which portions of that information to select for preservation?" This followed Jerry Ham's suggestion that "archivists [could, for instance] determine the documentation needed to study contemporary religious life, thought, and change and then advise denominations and congregations on how their records selection can contribute to this objective."

Hinding credited the questions raised by Gould Colman as "probably the first published statement about documentation" and noted his role as a member of the program committee for the 1974 SAA annual meeting at which Ham used the phrase "documenting American cultures" in his presidential introduction that defined the theme of the meeting. As Hinding pointed out, there was some concern among archivists that the "activists" wanted not only to collect records of activities not previously considered worthwhile, but they also sought to "create" records where none existed or were lost. The burgeoning oral history movement was seen by some archivists as a way to document the undocumented and by others as archivists creating-perhaps even fabricating—a historical record.10

A European analysis of appraisal theory was provided by West German archivist

[&]quot;Howard Zinn, "Secrecy, Archives and the Public Interest," *Midwestern Archivist* 2 (1977): 25. An abridged version of the paper appeared earlier in *Boston University Journal* 19 (Fall 1971).

^{&#}x27;Patrick M. Quinn, "The Archivist as Activist," Georgia Archive 5 (Winter 1977): 26.

⁸Andrea Hinding, "Toward Documentation: New

Collecting Strategies in the 1980s," in Options for the 80s: Proceedings of the Second National Conference of the Association of College and Research Libraries (Greenwich: JAI Press, 1982), 535, 537.

⁹Hinding, "Toward Documentation," 537. Ham, "The Archival Edge," 12.

¹⁰Hinding, "Toward Documentation," 538. Ham's use of the phrase was in the SAA Annual Meeting Program (Chicago: Society of American Archivists, 1974), 5. For an example of the anti-activist sentiments, see the acidic comments of Gregory A. Stiverson, "The Activist Archivist: A Conservative View," Georgia Archive 5 (Winter 1977): 4-14.

Hans Booms, whose 1971 presentation to the Forty-ninth German Archives Congress was primarily a response to the Marxist rhetoric of his East German colleagues. After demonstrating the inadequacies of archival theory, Booms sought a more active role for archivists and a more adequate analysis of the world of archival documentation. "The historian has a right . . . to an archival documentary record that has been systematically created following principles grounded in archival theory." Archivists would, through selection, create a representative record. He also argued more specifically for a "documentation plan." Such a plan, which would cover "five, ten, or at the most twenty years . . . should not remain the responsibility of a single or even several archivists. [It] should be discussed in an advisory council composed of individuals from different areas of life such as administration, science, the media, or economics [and] should be written down [or even] published." He adds, "The final product will be a model for forming the documentary heritage which has been developed by archivists, is sanctioned and controlled by society at large, and can be analyzed using the historical method of documentary criticism." Even advocating a documentation plan did not alter Booms's assessment of the subjective basis of archival appraisal theory: "The extent of archival subjectivity and societal conditioning evident in this documentation model and its influence on our conception of history seems rather frightening."11

Elaboration

The emerging documentation strategy model appeared full-blown at the 1984 SAA annual meeting where a series of nine sessions were grouped under the rubric "Documentation/Appraisal Strategies." Larry Hackman and Helen Samuels (then Slotkin) shared a session entitled "Speculations on Documentation Strategies." Samuels later noted that this grew out of their work on the SAA program committee and the Goals and Priorities Task Force two years earlier.12 Although neither, it appears, were then familiar with Hinding's address to the College and Research Libraries Association in 1981, their arguments closely resembled hers.

The published dissemination of the consequential 1984 annual meeting session began in 1986 when Samuels first published her seminal plea for documentation strategies, "Who Controls the Past." Her thinking on the subject was also informed by her participation in two connected projects relating to the history of modern science, one the report of the Joint Committee on Archives of Science and Technology (JCAST) and the other the Massachusetts Institute of Technology appraisal guide.¹⁴ A major result of these two projects was to bring Joan Warnow-Blewett's existing program at the Center for American Physics to the attention of the documentation strat-

¹¹Hans Booms, "Society and the Formation of a Documentary Heritage: Issues in the Appraisal of Archival Sources," *Archivaria* 24 (Summer 1987): 81, 106. Not published in English for more than fifteen years, although summarized by Nancy Peace in 1984, Booms' analysis has not yet made a major impact on North American archival theory. See Nancy Peace, "Deciding What to Save: Fifty Years of Theory and Practice." *Archival Choices: Managing the Historical Record in an Age of Abundance* (Lexington: Lexington Books, 1984), 10-11.

¹²Helen Willa Samuels, "Who Controls the Past," *American Archivist* 49 (Spring 1986): 109-24. The quotation is from p. 114.

¹³ bid. It was in this article (at p. 117) that Samuels acknowledged the influence of Hans Booms and his arguments.

¹⁴Clark 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 of Science and Technology (Chicago: Society of American Archivists, 1983); Joan K. Haas, Helen Willa Samuels, and Barbara Trippel Simmons, Appraising the Records of Modern Science and Technology: A Guide (Cambridge: Massachusetts Institute of Technology, 1985).

egy working group. Another 1986 article, this one describing the MIT appraisal project, firmly grounded documentation strategy in appraisal: "When appraising records, archivists should consider the total body of available documentation, not just the material they are appraising."15

In "Who Controls the Past," Samuels argued that appraisal emphasizes "form rather than substance of the record"; in this she also recognized the influence of the Research Libraries Group conspectus, another library development that was shifting the emphasis to subject or topical criteria. Once "the legal mission [i.e., gathering the core collection mandated by the institution, has been] assured, archivists can examine their collections as sources of information, seek ties with other institutions, and develop new strategies to build and manage collections,"16

Larry Hackman and Joan Warnow-Blewett's participation in the Research Fellowship Program for Study of Modern Archives at the Bentley Historical Library in Ann Arbor during the summer of 1985 moved the documentation strategy concept to a new level of development. Their resulting 1987 article, "The Documentation Strategy Process: a Model and a Case Study," is unlike most collaborative articles in that it is cobbled together out of disparate parts. The essential elements were Hackman's conceptual model for documentation strategy, Warnow-Blewett's case study of the Center for the History of Physics (a twenty-five-year-old program to document the history of modern physics), and a brief (presumably jointly authored) section entitled "Implications for Archival Principles and Practice." The article proA documentation strategy is a plan to assure the adequate documentation of an ongoing issue, activity, function, or subject. The strategy is ordinarily designed, promoted, and in part implemented by an ongoing mechanism involving archival documentation creators, records administrators, archivists, users, other experts, and beneficiaries and other interested parties. The documentation strategy is carried out through the mutual efforts of many institutions and individuals influencing the creation and management of records and the retention and archival accessioning of some of them. The strategy is regularly refined in response to changing conditions as reflected in available information, expertise, and opinions. Strategies may be developed at levels ranging from worldwide and nationwide to statewide and communitywide.17

Hackman and Warner-Blewett described current acquisitions efforts as "highly reactive and incremental . . . generally passive in [their] approach to influencing records creators and others who might in turn influence records creators toward appropriate documentation decisions; and . . . equally passive regarding the need to create archival programs." In contrast, "the documentation strategy model . . . requires that archivists employ a more activist attitude and a wider array of methods to influence records creators both directly and indirectly."18

To move from the abstract to the concrete, Hackman is precise in stating that he offers a theoretical or conceptual model that needs to be forged in the crucible of prac-

vides the full-scale definition of documentation strategy:

¹⁵Joan K. Haas, Helen Willa Samuels, and Barbara Trippel Simmons, "The MIT Appraisal Project and Its Broader Implications," American Archivist 49 (Summer 1986): 310. This paper also grew out of a presentation at the 1984 SAA meeting.

16Samuels, "Who Controls the Past," 112-14.

¹⁷Larry J. Hackman and Joan Warnow-Blewett, "The Documentation Strategy Process: A Model and a Case Study," American Archivist 50 (Winter 1987): 14. 18Ibid., 15, 45.

tice and hammered into shape by other theorists. "This model is valid only if it can be sustained as a process for improving the analysis and the information on which the analysis is based and for implementing the recommendations in the current documentation strategy statement." In addition, he notes that "one consequence, if the model is viable, is to introduce the concept 'adequacy of archival documentation' directly into archival theory. This will challenge archivists to work out in more detail its implications for existing theory and methods. Adequacy poses the questions of how best to categorize archival documentation when undertaking this measurement." As yet there has not been much in the way of concrete testing and measurement.19

The model Hackman proposed was accompanied by an extensive description of the program of the Center for History of Physics at the American Institute of Physics (AIP), prepared by the center's associate director, Joan Warnow-Blewett. Established in the early 1960s, long before there was any inkling of documentation strategies, the AIP program in part contradicts its status as an example of the documentation strategy concept. It documents a narrow world, concentrating on a scientific elite that is composed almost entirely of white males in high positions in government, academe, and industry. Nonetheless, the program at the Center for History of Physics "parallels in many ways the documentation strategy process model presented above [although] it was not developed with such an explicit model in mind."20

The initial effort toward the AIP project came from the physicists themselves, because they "had no archival models to follow." In fact, it seems from this report that they had to convince archivists of the need to be involved.²¹

Later in the same year that the Hackman-

Later in the same year that the Hackman-Blewett article appeared, Samuels presented a hypothetical case study, "The Roots of 128," yet another piece that was first aired at the critically important 1984 SAA meeting. Developed as part of a New England Archivists documentation program, one that Eva Moseley described as "roughly contemporary with that of the concept of documentation strategy," the "Roots of 128" proposed applying the documentation strategy model to the Boston ring-road computer industry. Here Samuels and her co-author merged their experience with JCAST and the MIT appraisal projects into a near real-world example. As such, it is filled with "mights," "shoulds," and "ifs." It does make the point again that "the rationale behind this idea is that traditional collecting activities, shaped by the internal concerns of a single institution, no longer adequately respond to the challenges presented by modern records. A documentation strategy attempts to fill the breach by involving records creators, administrators (including archivists), and users in a joint analysis of documentation problems, and in the planning and coordination of a more unified approach to the creation, collection, and retention of records."22

Reality

There has been, however, only one real test of the documentation strategy model

¹⁹Ibid., 29, 44.

²⁰Ibid., 29. The same is true of, for example, the Center for Popular Music at Middle Tennessee State University and the Social Welfare History Archives at the University of Minnesota. See Ellen Garrison, "The Very Model of a Modern Major General: Documentation Strategy and the Center for Popular Music," Provenance 7 (Fall 1989): 22-32; and David J. Klaassen, "Achieving Balanced Documentation: Social Services from a Consumer Perspective," Midwestern Archivist 11 (1986): 111-21.

²¹Hackman and Warnow-Blewitt, "Documentation Strategy Process," 31, 38.

²²Philip N. Alexander and Helen W. Samuels, "The Roots of 128: A Hypothetical Documentation Strategy," *American Archivist* 50 (Fall 1987): 519. The Moseley quote is from her introduction to the "New England Documentation" issue (at pp. 468-69), in which "Roots of 128" appeared.

reported in the literature. Larry Hackman's colleague, Richard Cox, has reported on the Western New York documentation project, which was explicitly designed as a test of the model. This project, funded by the National Historical Publications and Records Commission, did not achieve its goal of producing a full documentation plan. It also raised a number of questions about the process. Cox correctly notes that "first . . . the documentation strategy is intended to supplement rather than replace traditional methods of archival appraisal. . . . Second, the documentation strategy is largely hypothetical at this point and its supposed benefits are largely untested."23

Among the problems encountered were that the process, though "worth doing," required "significant effort and discussion to accomplish," much more than was available to the project team. The project produced only the first part of the planned activities, the documentation analysis. In addition, Cox asserts "that resources to support broad regional documentation analysis are difficult to obtain." Left unresolved was the efficiency and effectiveness of the process, and whether it results "in better-informed selection and acquisition decisions."²⁴

Few other efforts to continue to test this model have yet been reported.²⁵ However, much of the documentation strategy literature points approvingly at cooperative efforts such as statewide networks. Such cooperative arrangements were described extensively and optimistically (although not consciously linked to documentation strategies) in a special issue of the *Midwestern*

Archivist in 1982. However, budget constraints caused many of the statewide networks to be scaled back and led to the dissolution of the Minnesota network, which was once viewed as a model. Most recently, William Maher has suggested: "While the documentation strategy process has practical and theoretical limitations, it also can serve as a strong intellectual framework for the local cooperation of academic librarians and archivists because it emphasizes the subjects or issues being documented, rather than specific kinds or formats of materials." 27

A more likely pattern for an acquisitions program is that described by Brian Cockhill of the Montana Historical Society at a joint meeting of the Association of the British Columbia Archivists and the Northwest Archivists in 1981. Cockhill noted a variety of problems affecting archival institutions, problems given only passing mention in much of the discussion of new archival documentation models. Chief among these problems is a lack of resources to support the basic mission of the agency (leading in the historical society's case to a cooperative network agreement with academic institutions in the state, or—more bluntly a shifting of the responsibility to the financial pockets of others). Although not presented as a documentation strategy, all institutional efforts were devoted "towards securing the widest possible range of documentation for Montana's repositories."28

²³Cox, "A Documentation Strategy Case Study," 192.

²⁴Ibid., 195, 196, 199.

²⁵William Moss's article, "Documentation Strategies for the National Legislature," *Provenance* 3 (Fall 1985): 53-70, is not related to the type of documentation strategy model discussed here.

²⁶Midwestern Archivist 6:2 (1982); in particular, see James E. Fogerty, "Manuscript Collecting in Archival Networks," 130-41. For discussion of the Minnesota experience, see Fogerty, "Minnesota: An Archival Network in Transition," Georgia Archive 10 (Fall 1982): 39-50.

²⁷William J. Maher, "Improving Archives-Library Relations: User-Centered Solutions to Sibling Rivalry," *Journal of Academic Librarianship* 15 (January 1990): 361.

²⁸Brian Cockhill, "Philosophy and Operation of the Acquisitions Program for the Montana Historical Society," Proceedings of the Joint Meeting of the Association of the British Columbia Archivists and the

Eva Moseley admitted that many archivists dropped out of the New England documentation project because "it was too difficult and time consuming to research and write the history, and to investigate the sources at repositories other than the author's own." Cox also noted that financial constraints limited the success of the New York project. Even Larry Hackman recognized potential problems in this area: the final task of his hypothetical documentation group is to seek the "resources needed to sustain and improve the documentation process." This contradicts the earlier claim that "the model is not designed to increase the resources needed by individual repositories to carry out their work but instead to increase the results achieved with the same or fewer resources."29

Frank Boles has offered a more theoretical dissent, arguing that a documentation strategy will necessarily succumb to the institutional imperative as archivists are forced by institutional policies to concentrate on records central to the mission of their institution. Thus, any documentation strategy must be subordinate to the institutional collecting policy. He notes, in particular, that the vision of documentation strategy promoted by Samuels and Hackman requires the subservience of institutional policy to broader cooperative strategies.30 Samuels, on the other hand, hoped that "documentation strategies will not create subject collections or force any individual institution to assume more than its own institutional responsibilities. Rather, documentation strategies are a form of analysis that promotes the coordination of the activities of many separate archives."³¹

Boles noted that lack of common and standard appraisal policies make adoption of interinstitutional documentation strategies problematic. Archivists and archives, he believes, are too individualistic to cooperate in that way. In contrast with the views of Hans Booms, Boles suggests that policy evaluations carry more weight than value judgments during archival appraisal. He also recognizes the resource issue: "Simply put, the literature regarding documentation strategy presumes archival prosperity."32 Connell Gallagher has described the contrasting reality: "After a decade of 'activist archivists' we are bulging at the seams, grant money is getting tighter, and the programs are more expensive to run."33 Although Gallagher goes on to review and to reiterate archival impoverishment, neglect, and underfunding, it is probably sufficient here to note that all known documentation strategy projects have been supported by federal funding.

A more productive approach, because it is institutionally based, may be that presented by Judith Endelman, whose work, like that of Hackman, Warner-Blewett, and Boles benefitted from participation in the Bentley Library's Research Fellowship Program. Endelman proposed analyzing the existing collection as an approach to "determine the nature and strength of a repository's holdings in specified areas and then use this knowledge to develop explicit collecting priorities." She studied collection analyses that had been conducted at the State Historical Society of Wisconsin, the Minnesota Historical Society, and the Michigan Historical Collection at the University of Michigan. All were weak in the same

Northwest Archivists, Victoria, B.C., April 23-25, 1981 [Seattle, 1981], [29-39.] The quotation is from p. 36.

29Moseley, "Introduction," 20. Hackman and Warner-Blewett, "The Documentation Strategy Process," 26, 20.

³⁰Frank Boles, "Mix Two Parts Interest to One Part Information and Appraise Until Done: Understanding Contemporary Record Selection Processes," American Archivist 50 (Summer 1987): 358.

³¹Samuels, "Who Controls the Past," 123.

³²Boles, "Mix Two Parts Interest," 365-67.

³³Connell Gallagher, "Problems of the Collection Development Archivist," *AB Antiquarian Bookman* (19 March 1990): 1225.

areas: tourism, agriculture, regions outside the county where the repository was located, labor, religion (aside from mainline Protestants), and new immigrants and ethnic groups; none had collections on the Korean or Vietnam War (although Michigan had documentation on the anti-war movement on campus). Each institution prepared new collection development policies based on the analysis of collections which contained "a statement of collecting priorities and suggested collecting strategies."34

Linda Henry's statement, noted earlier, "that research follows the records" seems, after a review of Endelman's study, to be contrary to experience.35 Archivists have only to look at their collections to identify massive quantities of significant records that sit unstudied for decades. The activist archivist argument, while attractive, assumes that archivists have been supplied with the resources to keep up with institutional demands and the additional resources to go out and be proactive and that they will be rewarded for doing so. David Horn has optimistically asserted that "we must be active as archivists and perform well for two reasons: first, our work is essential; second, no one else can or will do it."36 Both reasons suggest a level of professional responsibility that is not perceived by all members of the public.

Participating in the records creation process to ensure complete documentation can create an apparent conflict of interest and negate the archivist's role as "honest broker" in the availability and selection of the historical record.37 Archivists should also

remember that earlier efforts to enhance the documentation process, by claiming control over the creation and maintenance of office files, accomplished little but to drive the records managers off to reform their professional identity and to reiterate that that particular turf was theirs alone.

Conclusion

The documentation strategy model is misnamed. It is not a strategy as much as it is a Sangreal—the Holy Grail. As a matter of practical implementation, it is not difficult to declare it an illusion. Richard Cox has done as much in his test of the model. As an ideal, however, or "an analytical construct meant to guide action, not to straitjacket it,"38 it may offer a suggestive conception of the total universe of documentation and of the potential role of the archivist. Although the conception is inherently unrealizable, many of the tasks proposed by the model are important ones to undertake. As Cox asked, "Even if the documentation strategy model as now proposed is flawed, don't we need some kind of method that enables us to look at the broader issues of identification and selection of historical records?"39

It may be impossible to complete a documentation strategy (which is, in fact, described as never finished), but the several steps taken in that direction will be of benefit: an analysis of institutional holdings, a carefully written collection development plan, an appraisal policy, knowledge ofif not full cooperation with—other repositories in the region. These were all identified as worthy goals for the archivist long before documentation required a strategy. The ensuing discussion merely clarified their value and importance.

³⁴Judith Endelman, "Looking Backward to Plan for the Future: Collection Analysis for Manuscript Repositories," American Archivist 50 (Summer 1987): 341, 345-47.

³⁵Henry, "Collecting Policies of Special Subject Repositories," 58.

³⁶David E. Horn, "Today's Activist Archivists: A Moderate View," Georgia Archive 5 (Winter 1977):

³⁷Stiverson, "The Activist Archivist: A Conservative View," 4-14. But Howard Zinn argues that in a

political world the archivist's "supposed neutrality is, in other words, a fake." Zinn, "Secrecy, Archives and the Public Interest," 20.

³⁸Hackman and Warnow-Blewett, "Documentation Strategy Process," 43.

³⁹Cox, "Documentation Strategy Case Study," 200.