

# Crossing Boundaries: Intergovernmental Records Cooperation, 1987-1997

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**Abstract:** In the Information Age, traditional organizational and geographical barriers are falling. While overlapping jurisdictions and historical accidents occasionally led to the scattering and fragmentation of documentation in the past, modern federalism has accelerated and systematized problems with decentralization and fragmentation of government records in the United States. During the past decade, federal, state, and local government archivists and records managers have worked together on pilot projects to address problems with historic and modern records fragmentation. These projects offer new approaches and experiences in the documentation of intergovernmental records and the development of a national perspective on the management of government records in the twenty-first century.

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## Introduction

ARCHIVAL COOPERATION HAS BEEN a popular theme in the last twenty years, providing the impetus for documentation strategies, communication exchange formats, finding aid standards, and much more. Cooperative programs among government archivists at the federal, state, and local levels can be described in two primary categories—as both parallel and intergovernmental. Parallel efforts bring government archivists together to develop descriptive guidelines and procedures for their own records, share best practices, develop models that many may use, or combine to influence information policy at national levels. Intergovernmental records programs focus more specifically on the shared management of records that are intergovernmental in nature.

Intergovernmental records have traditionally been the orphans in the government recordkeeping family. Historic records of this type have been scattered by historical accident or overlapping functions in a crazy quilt of custodial locations and histories. The first intergovernmental project sponsored by the National Archives and Records Administration (NARA) in the mid-1980s focused on using the technology of a national bibliographic database and the MARC AMC format to identify and test new descriptive methods for four categories of historic intergovernmental records. In this effort, NARA partnered with more than a dozen state and local archival programs, as well as with the National Association of Government Archives and Records Administrators (NAGARA) and the National Historical Publications and Records Commission (NHPRC). Although access technology provided by new Internet browsers is of more interest today than the more cumbersome and less intuitive MARC format, the issues defined and solutions explored for improving access to these historic records are still useful.

In the early 1990s, NAGARA began to urge NARA to focus on more significant and systemic types of intergovernmental records, those produced by the modern intergovernmental governments of the last half of the twentieth century. Revolutionary changes had occurred in the federal system. While archivists were continuing to manage government records under federal, state, or local records management structures, laws, and regulations, current government practice was increasingly blurring the distinctions between those levels.

For government archivists, the importance of thinking across jurisdictional lines or organizational boundaries is increasing every day. While the divided records of the previous centuries were never the majority of our holdings, the records of shared intergovernmental programs make up an increasing proportion of our current and future accessions. The state archivist who wants to ensure the preservation of permanent records in an electronic system containing health, employment, or income information may need to participate, or ensure that other records managers participate, in the design of that system by the federal oversight agencies who cover all or part of its cost. Federal archivists and records managers have a new role to play as the link to key federal officials for the fifty state archives and the thousands of local archivists and records managers who cannot make that connection themselves.

In the mid-1990s, NAGARA and NARA tested the possibilities of modern intergovernmental records cooperation in a major study of the recordkeeping activities of the Food Stamp Program. This project brought federal and state records managers and archivists into a partnership with information technologists, program managers, and records managers for a massive national program. The lessons learned from this experience, de-

scribed in this article, are now being extended to a second project, which is focused on criminal justice records.

The waves of change brought by the Information Age extend far beyond the ubiquity of personal computers on every desk. Organizational boundaries, like geographic boundaries, are of less and less importance to the new customer who expects convenience, speed, and "one stop" shopping. U.S. Treasury Department Chief Information Officer James Flyzik illustrates this point by noting that, "If a citizen can't get out of her garage because the snow hasn't been cleared from the streets, she doesn't care whether federal, state or local officials are responsible for snow removal. She just wants government officials to clear the street."<sup>1</sup> In the competition for scarce resources, government archivists and records managers must organize information and access services to meet the expectations of the Information Age researcher or face the possibility of becoming irrelevant.

### **Establishment of an Intergovernmental Records Program at NARA**

The "father" of the idea for an intergovernmental records program at NARA was Frank B. Evans.<sup>2</sup> In April 1987, Evans presented a proposal for an intergovernmental records project to the Board of Directors of the National Association of Government Archives and Records Administrators (NAGARA). In December 1987, the board endorsed the proposal in principle, suggesting that one or more specific categories of records be selected as an initial focus. Evans also presented the proposal to the new archivist of the United States, Don W. Wilson. The idea coincided with Wilson's vision of a "truly national" role for the National Archives in "articulating the national interest in the identification, preservation and accessibility of archival records at all levels of government."<sup>3</sup> In January 1988, NARA established the Intergovernmental Records Program (IRP) with Frank B. Evans as director, and Marie Allen as deputy director. The purpose of the program was to facilitate the exchange of information about government records that were divided or duplicated as a result of historical accident or because of parallel functions of government. A chronology of the programs and projects sponsored by the IRP is provided in Figure 1.

### **The Intergovernmental Records Project: Phase I**

The IRP's initial plan had been to focus on cooperative endeavors with state archival programs in Wisconsin and Virginia. In late spring 1988, the IRP and its two state partners

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<sup>1</sup>Comment made by James Flyzik at a Bimonthly Records and Information Discussion Group panel on "Intergovernmental Partnerships in Information Management," 6 June 1996, National Archives and Records Administration Building, Washington, D.C.

<sup>2</sup>While serving as deputy assistant archivist for the Office of Records Administration, Evans delivered a series of papers on the topic of intergovernmental cooperation in records description and appraisal at professional meetings in 1986 and 1987. Evans's papers described the division and duplication within the unpublished documentation of the American governmental experience scattered throughout the United States in thousands of public offices at various levels of government and in a wide range of archival and manuscript repositories. He identified several categories of this scattered documentation: information duplicated at the different levels of government, divided archives placed at various times for safekeeping in a multitude of public and private institutions, and records that result from administratively divided and parallel functions of government. Evans proposed that archivists use new on-line bibliographic systems such as the Research Libraries Information Network (RLIN) to bring together intellectually these physically scattered archival materials.

<sup>3</sup>Don W. Wilson, "The National Archives: New Challenges, New Opportunities," *Prologue* 19 (Winter 1987): 20.

Figure 1.

### **Intergovernmental Records Program National Archives and Records Administration**

The IRP's purpose is to facilitate the exchange of information about government records that have been divided or duplicated through historical accident or that document administratively divided or parallel functions in the federal system of government in the United States.

#### **Phase 1, Accessioned Records Described in RLIN (1988-90)**

Included data entry into a national database of over 1,000 records series (both accessioned and scheduled records) in six categories of divided records, accomplished in cooperation with an NHPRC-funded project and RLIN-sponsored project (the Government Records Project) including 13 state archives and 2 municipal archives. Findings published in *The Intergovernmental Records Project Report* and an issue paper published by NAGARA (*Sharing Information on Intergovernmental Records*).

- **Nationwide Survey of Territorial and World War II Records (1989-1991)**  
Data entry into a national database (RLIN) of over 300 records descriptions received from other archival institutions as a result of a nationwide survey, coordinated with NARA regional officials, of 3,000 archival institutions for territorial and World War II-related series.

#### **Phase II, Intergovernmental Cooperative Appraisal Program (1992-ongoing)**

- **Appraisal and Scheduling Terminology Review (1992-93)**  
NARA's IRP and nine state archives compared appraisal and scheduling practices and data elements, and created a shared worksheet, procedures and data elements dictionary for intergovernmental appraisal. Chairs: Marie Allen (NARA), Kathryn Hammond Baker (Massachusetts), and Deborah Skaggs (Alabama).
- **Food Stamp Records Project (1994-95)**  
NARA's IRP, NAGARA, USDA Food and Consumer Services and six state archives (Alabama, Massachusetts, New York, South Carolina, Virginia, and Utah) formed partnership to review creation, management, and disposition of Food Stamp Program records. Produced *Food Stamp Project Report*. Chair: Marie Allen (NARA/IRP).
- **Project C.R.I.M.E. (1996-ongoing)** Intergovernmental records management evaluation of criminal justice records. Project participants include the states of Georgia, Kentucky, Massachusetts, Minnesota, South Carolina, Utah, and Virginia; the cities of Dallas and Philadelphia, the counties of Salt Lake (Utah) and Rome/Floyd (Ga.); and NARA. Chair: Grace Lessner (Library of Virginia).

accepted an invitation from Alan Tucker, a Research Libraries Group project director, to join the Government Records Project (GRP). An NHPRC-sponsored project, the GRP's task was, among other things, the retrospective conversion of descriptive material about government records utilizing the MARC AMC format and the Research Libraries Information Network (RLIN). The GRP included the original states from an earlier Seven States Project (Alabama, California, Minnesota, New York, Pennsylvania, Utah, and Wisconsin) as well as nine new participants (District of Columbia, Georgia, Georgia Historical Society (later replaced by New York City), Kentucky, Massachusetts, NARA, Nevada, Oregon, and Virginia).



In addition to a number of other goals, GRP participants agreed in the grant proposal to identify and enter into RLIN descriptions of records in four broad categories of divided, duplicated, or parallel documentary materials: territorial records, naturalization records, non-population censuses, and scheduled records relating to water pollution.<sup>4</sup>

Two years later, at the conclusion of the Government Records Project, the IRP staff had entered almost one thousand NARA records series descriptions in the targeted categories into RLIN, with several hundred more descriptions for the intergovernmental categories entered by participating state and local archival institutions.<sup>5</sup> In the process of accomplishing these tasks, the IRP developed and recommended strategies for the use of access terms and methods that would facilitate the retrieval of divided, duplicated, and parallel types of records. The IRP's strategy was to focus on the user, selecting records for data entry and recommending strategies for describing the records that depended on user needs, user access patterns, and eliminating barriers to successful retrieval. The categories used by the IRP also offer interesting glimpses into the historical accidents and developments that resulted in divided, duplicated, and parallel categories of records.

**Territorial Records.** Thirty-one of the states of the United States went through a period of organization as a territory prior to statehood, some for as few as three years and one for as long as sixty-nine years. Historical materials relating to the territorial period include records of central federal agencies having direct supervision over territorial governments and officials, records of territorial governments, and records of central agencies performing federal functions and/or maintaining field offices in the territories. The transition from territory status to statehood brought confusion in the transfer of records. The division of responsibility for the supervision of territorial affairs among several federal departments also led to dispersion of records. The IRP chose territorial records as a category for data entry because of this history of confusion and dispersion. Within that category, the project focused on the records of territorial courts,<sup>6</sup> records which were generally not described in earlier letterpress volumes or microfilm publications.<sup>7</sup>

A variety of records-transfer patterns existed when a territory became a state. Sometimes the territorial court records were transferred to state courts, with supreme court records transferred to the new state's supreme court, and district and probate court records transferred to the new state's local courts (superior, district, and county). Sometimes all

<sup>4</sup>The water pollution records descriptions were to come primarily from records schedules, and would give the project a chance to experiment with using descriptions for shared scheduling and appraisal. The IRP's original partners (Virginia and Wisconsin) also agreed to enter two additional categories that had been previously identified: pre-federal records in Virginia and New Deal agencies' work relief records in Wisconsin.

<sup>5</sup>The IRP reported its findings and recommendations in July 1990 in *The Intergovernmental Records Project Report: Case Studies in Description and Appraisal Using the USMARC-AMC Format*.

<sup>6</sup>The judicial system of the territories was provided for by the Acts of Congress establishing territorial governments, and generally included a supreme court, district courts, probate courts, and justices of the peace. The three justices for each territory were appointed by the president and sat together as the territory's supreme court, with each justice also presiding over a district court. The supreme and district courts had jurisdiction over cases arising under territorial law, with the territorial legislatures prescribing more specifically the civil and criminal jurisdiction of the district courts and the boundaries of judicial districts.

<sup>7</sup>In the second decade of the twentieth century, the first major compilation describing territorial records in Washington, D.C. was published by David Parker, with an introduction by J. Franklin Jameson. The fact that territorial papers were so widely dispersed and therefore often inaccessible led historical scholars to propose that the federal government make selected records available through publication. In the years that followed, the State Department and then the National Archives and Records Administration published letterpress volumes for eleven of the former territories. In many cases, additional records which could not be included in the letterpress volumes were made available through National Archives Microfilm Publications.

or most of the records were transferred to the U.S. District Courts in the new states, or to territorial administration officials in Washington. Because the records were not divided in consistent, predictable patterns, researchers cannot find the records easily without archival assistance.

The IRP entered into RLIN a total of 531 records series relating to territories of the United States. Series were described for the following territories: Alaska, Arizona, Colorado, Dakota, Florida, Hawaii, Idaho, Indian, Indiana, Kansas, Michigan, Montana, Nebraska, New Mexico, Utah, Washington, Wisconsin, and Wyoming. With these and several dozen other descriptions contributed by state archival programs, the territorial court records described in RLIN are the most comprehensive finding aid for these records currently available.

The territorial records described by different institutions were very closely related. For Wisconsin Territory, NARA holds the territorial court records, while the State Historical Society of Wisconsin has the records of the territorial legislature and treasury. For territories with boundaries different from the state of the same name, there are custodial anomalies. The Alabama Department of Archives and History holds portions of the records of Alabama, Mississippi, and Florida Territories. A Michigan Territory court record, 1805–36, located at the Bentley Historical Library, also includes records of predecessor courts for the earlier Northwest and Indiana Territories, 1796–1805. None of these examples are easy to find, however, even in a national bibliographic database, using existing cataloging rules.<sup>8</sup>

In order to use existing controlled vocabularies most effectively, the IRP recommended use of three different types of access terms: a subject term representing the appropriate chronological division of state history (preferably under “Politics and Government”), a form/genre term (“territorial records”), and the name of the territory in a local subject field (local terms can be locally defined and do not have to conform to Anglo-American Cataloging Rules).

The IRP also recommended that institutions share agency histories for creating organizations whose records are currently scattered in different custodial repositories. For instance, rather than having three different agency history records for “Alabama Territory” in three different institutions holding the records of that territory, all of the records series descriptions in RLIN could be linked to a single agency history for the territory. A researcher could then access the records of the territory without needing to know first that the records are housed in different repositories. The IRP prepared agency history records for each of the territories described in this report and invited other institutions to link these records to either (1) their own related agency history records, or (2) directly to descriptions of records created by that entity.

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<sup>8</sup>The IRP recommended that the name of a territory be used as the Main Entry (MARC 110 field) for a territorial record. However, according to Steven L. Hensen’s *Archives, Personal Papers, and Manuscripts: A Cataloging Manual for Archival Repositories, Historical Societies, and Manuscript Libraries* (Chicago: Society of American Archivists, 1991) (based on the Anglo-American Cataloging Rules): “When a succession of jurisdictions would be entered under the same name, use one heading for all, no matter what differences there are between the jurisdictions,” 102 (Rule 5.6B). This is no problem when the boundaries of the territory equal the boundaries of the state of the same name, but it is misleading to use the heading “New Mexico” for an agency history record describing New Mexico Territory when that territory eventually formed part of four states (Nevada, Arizona, Colorado, and New Mexico). In another example, even though the Wisconsin Territorial Government had legal authority to exist, governed the area of its jurisdiction, created records and formed parts of two states, it could not exist as a records-creating unit in RLIN and its records had to be described as though created by the state of Wisconsin.

**Naturalization Records.** Naturalization records are a good example of similar records created as a result of parallel functions at different levels of government.<sup>9</sup> The most common types of naturalization records are declarations of intention (by which applicants renounced allegiance to foreign governments and declared their intention to become U.S. citizens), naturalization petitions (by which applicants made formal request for U.S. citizenship, having met residence requirements and completed declarations of intention), and orders of certificates of the court granting naturalization to an individual. In some cases, the court separated naturalization records from other records. (The IRP has focused on this type of separated record.) In other cases, naturalizations can only be found by searching through the minute books, dockets, and other general records of the court.

The IRP selected for entry into RLIN, from thousands of naturalization records series, at least one entry for every federal court with nineteenth-century records as well as all series with name indexes—a total of about 180 entries. Twentieth-century records are indexed at a national level and are therefore easier for researchers to find. Accordingly, the project responded to users' needs by focusing on the earlier records. The IRP also created thirty-three organizational history records for federal district courts, which, in each case, describe the jurisdictional boundaries for that court.

The IRP chose these particular records for data entry after an analysis of current patterns of access. Researchers looking for nineteenth-century naturalization records usually knew the name of an applicant, the approximate date of application, and place of application. Many researchers could not, however, link the place name they had (usually county or city) with the jurisdictions of federal courts. Although some states have had only one federal district and one federal circuit court, with the state constituting a federal judicial district, there are many states with multiple federal district courts, some of which are also organized into geographic divisions. Accordingly, the IRP facilitated access by creating an organizational history record for each court, listing the counties included in each jurisdiction.

The IRP recommended a description strategy for naturalization records that included sharing organizational history records for each court (described above), form/genre terms (e.g., "naturalization records"), and subject terms (e.g., naturalization, name of state, name of county or city) for access to naturalization records.

**Non-population Censuses.** The decennial population censuses of the United States are a well-known and heavily used historical resource, a starting point for most genealogical researchers. Many historical researchers are also increasingly interested in the so-called "non-population censuses." Beginning in 1850, the Census Office began collecting statistical information about industry, agriculture, mortality, and such social groups as orphans, the insane, and the homeless. The use of printed instructions and multiple schedules resulted in an unusual degree of accuracy and reliability of data for these early records.<sup>10</sup>

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<sup>9</sup>The granting of citizenship to resident aliens in the United States has historically been a function of courts at all levels of government. Although Article I, Section 8 of the U.S. Constitution conferred upon the Congress the power to establish a uniform rule of naturalization, the first Naturalization Act in 1790 continued the division of responsibility for this function. A 1906 Act reduced the number of courts involved in naturalizations (although still at federal, state, and local levels) and established a Bureau of Immigration and Naturalization to "provide a uniform rule" for the granting of citizenship to aliens throughout the United States. From 1906 on, copies of most naturalization records were transmitted to this administrative office in Washington, D.C. from courts at all levels of government and the first central name indexes were created and maintained.

<sup>10</sup>Census schedules for industry (or "manufactures") contain basic information about every manufacturing, mining, fisheries, mercantile, commercial, or trading business with an annual gross product of \$500 or more.

In 1918, the Sixty-fifth Congress authorized the destruction of the non-population census schedules for the period 1850–80 in a move to conserve space and reduce fire hazards in public buildings.<sup>11</sup> The Census Bureau offered the records to public and private archival repositories and libraries, with the result that these valuable records were preserved but in a wide variety of institutions. After the establishment of the National Archives, federal archivists began a letter-writing campaign to identify the location of these records and secure either the originals or microfilm copies at NARA. The Duke University Library acquired original non-population schedules for Colorado, Connecticut, the District of Columbia, Georgia, Kentucky, Louisiana, Tennessee, and one county in Virginia. In the 1960s, the University of North Carolina Library received a grant to microfilm agricultural and manufacturing censuses for fifteen states. The Bentley Historical Library and the Yale University Library acquired microfilm copies of the schedules relating to their regions of the country.

The positive result of all this activity by a variety of archival repositories is that most of the original non-population schedules were preserved. The negative result is that a researcher can have a very difficult time finding the schedules for a specific state or date. Most of the Michigan schedules are at the Michigan State Archives, for instance, but the 1850 mortality schedule for Michigan is at the Ohio State Library. Most of the Montana schedules are at the Montana State Library, but the agriculture census for 1880 is at Duke University, bound with District of Columbia censuses. Most of Georgia's agriculture and social statistics schedules are at Duke, although the mortality schedules, which were once held by the Daughters of the American Revolution, are now at NARA.

In accordance with its mandate to facilitate the exchange of information about dispersed categories of records, the IRP created database descriptions for all of the non-population schedules in the custody of the National Archives, with cross references to the locations of other copies of those schedules.

Because of the confusion over various names for these non-population censuses, the IRP recommended that the LCSH subject term for the U.S. Census, with the date of the census, be used as a primary point of access. The popular names for the non-population censuses are represented in four different LCSH subject terms organized in very different ways and are therefore not the most useful access points. The IRP also recommended that archivists copy standard descriptions of these non-population censuses in scope and content notes in order to make comparisons easier among similar documents. Different series of the same type of census schedule are likely to be almost identical in subject content (though not in volume or arrangement) because the information was gathered by standard methods on standard forms.

**Scheduled Records Relating to the Federal Water Pollution Control Act.** The appraisal component of the IRP/GRP project focused on how to identify related scheduled items and share relevant information for records created as a result of the Federal Water Pollution Control Act. This act established a major environmental program administered

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Census schedules for agriculture show the owner, agent, or tenant of every farm with annual produce worth \$100 or more. Mortality schedules include the name, sex, age, color, birthplace, occupation, and marital status of each decedent, as well as the date and cause of death. The schedules for "social statistics" were utilized to collect information on a wide variety of subjects, including such typically undercounted groups as orphans, the insane, homeless children, indigent, deaf, blind, etc.

<sup>11</sup>House of Representatives, 65th Congress, 2d Session, Document No. 921, "Letter from the Acting Secretary of Commerce transmitting list of Executive Papers Not Needed Or Useful."

in a decentralized fashion across government lines. As part of this venture, the GRP partners entered nearly two hundred new water pollution control records in RLIN, with the majority of the records entered by Massachusetts, Virginia, and NARA.

The entering of scheduled records descriptions<sup>12</sup> in a national bibliographic database such as RLIN was controversial. There were those who thought such entries would be misleading because the records described were not yet available to any researcher. There were even more controversies about whether to enter descriptions of disposable scheduled records, since these would never be available to researchers. The greatest problem in comparing scheduled records, however, proved to be the old problem of inconsistent descriptive practices in the assignment of access terms. Even when relevant scheduled records were in the database, and terms were used for subject and functional area, it was hard to find them. The IRP recommended that major cross-cutting identifiers such as authorizing statutes be added to the access term selection, perhaps even in "statute history" records that could be similar in type to agency history records.

**Conclusions.** The project found that a national on-line bibliographic network like RLIN offers archivists an excellent tool for facilitating access to intergovernmental records, achieving intellectual synthesis for materials that will never be co-located physically. The controlled vocabularies used for subject and form/genre terms should also, and often did, facilitate access. There were major problems, however, with the assignment of terms from controlled vocabularies in a consistent manner. Archivists at different institutions, or even different archivists at the same institution, did not use the same terms for the same types of records. The IRP also found that the most effective descriptive strategy often called for the combination of several different types of access terms in order to provide effective retrieval.

The IRP proposed shared guidelines for describing intergovernmental records which the GRP participants were kind enough to test, comment about, and help us to improve. In general, however, RLIN functions more as the sum of many institutional descriptive parts than as an integrated entity. Proposals for shared cataloging are difficult to achieve. RLIN participants expected to construct their own organizational descriptions and series descriptions in a single institutional framework. The prospect of linking to others' organizational records raised concerns about how long and how well other institutions would maintain such records. Describing intergovernmental records was also difficult since these were often fragmentary, difficult to describe, and description was very time intensive.

We have entered the marvelous new world of on-line global access, in which descriptions of archival records produced by hundreds of different archival institutions can be linked digitally. With RLIN, and now with the World Wide Web, however, problems are surfacing with the inconsistent and disparate descriptive practices revealed through these decentralized systems. The need to serve the user better, and ensure effective, not just rapid, retrieval, will continue to cause archivists to work toward more integrated descriptive policies and practices. We also need to help our users design more effective search strategies, since the Information Age researcher is less likely to depend on trained archivists and librarians as research intermediaries.

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<sup>12</sup>NARA's new ARDOR database would provide on-line access over the Web to records schedules of more than thirty federal agencies.



## Divided and Duplicated Records in a Modern Context: Phase II

The examination of modern scheduled records had been a small part of the first phase of the IRP. It became the centerpiece of the next major project. In 1991, NAGARA and NARA established a joint committee to recommend future directions for intergovernmental cooperation involving the two organizations. The advisory committee recommended that the IRP focus future efforts on intergovernmental scheduling and appraisal of modern records in a NARA/NAGARA partnership that became known as ICAP (the Intergovernmental Cooperative Appraisal Program). NAGARA's and NARA's interest in this project reflected an awareness of the changing face of government in the United States in the second half of this century and the growing importance of intergovernmental programs.

## Changing Nature of Government in the United States

The commonly accepted wisdom that the federal sector is the largest arm of government and is growing at a steady and escalating rate is wrong. The federal sector ballooned in size during the New Deal programs of the 1930s and during World War II. By the 1950s, however, a different pattern became apparent and has continued for the last half of the century. Federal civilian employment leveled out at slightly less than 3 million in the early 1950s and has not grown significantly since then. Recent figures<sup>13</sup> list a total of 2,813,121 civilian federal employees. It is at the state and local levels that growth has occurred in public employment. Over a thirty-year span, as demonstrated in Figure 2, local government employment has increased from about 4 to about 11 million, and state employment has tripled, to about 4.5 million.

Even though federal employment has not grown significantly, the federal budget has doubled many times over since the early 1960s, from \$118 billion to over \$1 trillion, from \$640 per capita to about \$5,792 per capita.<sup>14</sup> Intergovernmental scholar Deil S. Wright explains the disparity between huge budgets and a flat national bureaucracy with the "national government's tendency in recent years to govern through intermediaries, or what one perceptive writer calls 'government by remote control.' National agencies, by contracts and grants, attempt to promote and produce program results through third parties. State and local governments represent nearly 80,000 jurisdictional intermediaries, and state and local officials (both elected and appointed) constitute over 10 million individual intermediaries. Using these go-betweens, however, compels federal agencies to pursue administrative control strategies that emphasize regulation by such means as attaching national policy objectives, mandates, or 'strings' to grant programs."<sup>15</sup>

In 1960, total federal aid to state and local governments amounted to about \$7 billion; by the late 1980s, the total had grown to \$122 billion. Over the same time period, the number of federal grant programs for state and local government increased from 132 to almost 500; from about six thousand state and local government units receiving grants to almost eighty thousand.<sup>16</sup>

<sup>13</sup>United States Office of Personnel Management, *Federal Civilian Workforce Statistics: Employment and Trends* (Washington, D.C.: August 1997), 28.

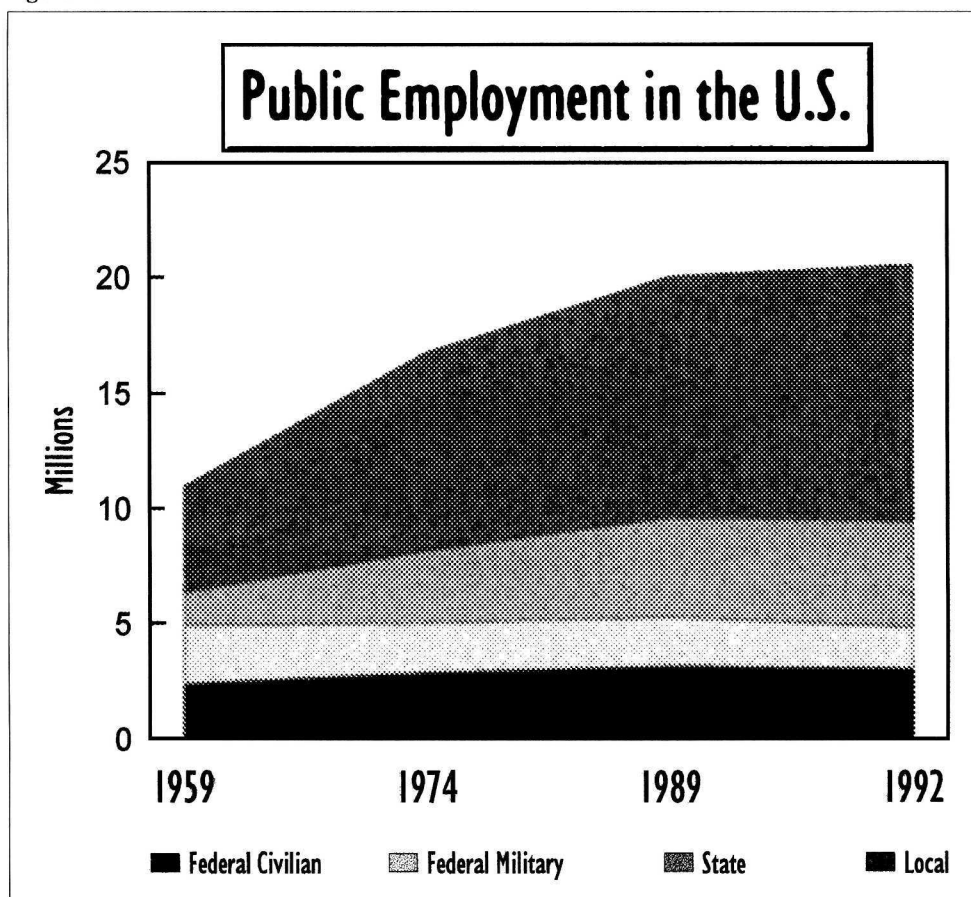
<sup>14</sup>Advisory Commission on Intergovernmental Relations, *Significant Features of Fiscal Federalism* (Washington, D.C., 1994), 22–25.

<sup>15</sup>Deil S. Wright, *Understanding Intergovernmental Relations* (Pacific Grove, Calif.: Brooks/Cole Publishing Company, 1988), 21–22.

<sup>16</sup>ACIR, *Significant Features of Fiscal Federalism*, 30.



Figure 2.



Major government programs in the United States today are likely to be multi-jurisdictional in policy and funding, with documentation regarding the purposes and administration of the program scattered at all three levels of government. The records managers and archivists responsible for the documentation of those programs, however, still review, control, and administer their programs within the small slice represented by their own jurisdictional context, whether at the federal, state, or local levels. With the Food Stamp Records Project, archivists and records managers had the opportunity to evaluate and review the documentation of a single national program at all of its administrative levels, working with both federal and state program administrators and information technology specialists.

### Food Stamp Records Project

The Food Stamp Program feeds over 27 million needy people in every state and territory of the United States through an intergovernmental partnership between federal and state (and sometimes local) governments. The good work of the program comes, however, at the price of a significant paperwork burden. Over half-a-billion pages in case files alone fill government offices throughout the country and require thousands of workers

to create, maintain, and retrieve information. In addition, government offices at all levels are increasingly using electronic systems for program purposes without guidelines for compliance with recordkeeping requirements. The first "paperless" Food Stamp Program, begun in Tennessee in 1994, demonstrated that redundant paper-based recordkeeping systems were no longer necessary if appropriate safeguards were in place for electronic systems, and that information technology could be used as an enabler to improve the business process and information management practices.

The Food Stamp Records Project was created in early 1994 to examine the recordkeeping practices of this massive intergovernmental program across all levels of program administration and identify methods of streamlining and paperwork reduction consistent with the accomplishment of statutory recordkeeping responsibilities. We had been searching for a federal partner for such a project for several months. I met Joseph Leo, Deputy Assistant Administrator for Management, Food and Consumer Service and a former member of Vice President Gore's National Performance Review Team somewhat accidentally at an open forum sponsored by NASIRE (the National Association of State Information Resource Executives). Leo was concerned about the burden of massive paper case files and wanted to move the Food Stamp Program in a more paperless direction. I had the chance to urge him to include records managers in the development of such an electronic recordkeeping system. By the end of the meeting, we had formed a partnership.

The Food Stamp Records Project participants included NARA (Marie Allen, Chair; and Rosalye Settles), the United States Department of Agriculture's Food and Consumer Service (FCS, represented by Don Horne and Joseph Leo), and six state archival/records management programs: Alabama (Deborah Skaggs, Tracey Berezansky), Massachusetts (Kathryn Hammond Baker, David Best), New York (Tom Mills), South Carolina (Pat Durlach, Roy Tryon), Utah (Sharon Hughes, John Hulmston), and Virginia (Grace Lesner). As Chair of NAGARA's Intergovernmental Committee, I also represented NAGARA.

**Project Procedures.** We had no models to use for intergovernmental evaluation and scheduling. Project members established goals and objectives at a preliminary conference sponsored by NARA in April 1994. We gathered information in the traditional ways through reviewing statutes and regulations, distributing surveys, inventorying records, and interviewing a wide range of Food Stamp Program (FSP) personnel. Hundreds of FSP officials were interviewed at all levels of government, including eligibility counselors, information technology specialists, and records managers.

Because the Food Stamp Records Project was sponsored by both information technology and records management units, we had dual objectives. We emphasized the streamlining and paperwork reduction aspects of this project for the information technology and program managers. We kept a focus on recordkeeping issues for the records professionals. We found that the several goals were easily and successfully combined. Combining these communities also created a momentum for the project's recommendations.

At an early panel session in College Park, Maryland, project participants met with federal and state information technology, program, and records managers. As questions came up focusing on particular regulatory requirements, there were several occasions when neither the federal nor the state managers could see any reason to continue a particular requirement and noted that the original reasons for such items were probably long since forgotten. Each had thought the requirements were originated by the other. This panel session was apparently the first time that regulators at both levels of government had sat

in one room at the same time and responded to questions from federal and state records managers and archivists.

The range and scope of the project's access to program officials was unusual, and happened only because high-level federal program managers sponsored the project and sent letters of introduction and support for project participants to state program managers. In previous years, many state archivists had reported problems in gaining any access at all to Food Stamp Program records. Officials in one state told a state archivist that all Food Stamp Program records were legally federal records. Such access problems and misunderstandings are not unusual for intergovernmental programs, since the lines of oversight and regulation are complex and poorly understood.

The project followed a functional analysis approach, identifying first the functions of the Food Stamp Program, noting which functions operated at each level of government, and then looking for the permanent and temporary records related to each function (see Figure 3). Several new series at the federal level were identified and scheduled as permanent as a result of this approach, since several functions were not previously represented in the schedule. The functions and processes chart also helped project members to note any variations in the way the program was administered in various states. In the Food Stamp Program, for instance, the local offices are almost always local units of state government, rather than units of city or county governments. Finally, the functions/processes chart was merged with records series descriptions and retention recommendations to produce a model intergovernmental records schedule. While not a legally binding document, this model intergovernmental schedule could be used to identify items for inclusion in schedules at the federal, state, and local levels. The intergovernmental schedule was also one of our proudest achievements, particularly since we weren't sure, at the beginning of our work, that such a document could be produced.

Because benefit recipient and applicant case files are an important part of Food Stamp Program records, project members surveyed state case files and charted the diverse content of these series in the different states. We produced guidelines for improving case file management in the final report, recommending written case file management procedures, segregation of long- and short-term materials, and cut-off and disposition procedures.

Finally, project members addressed the importance of electronic records in the future of the Food Stamp Program. Information technology is transforming recordkeeping in the program. Electronic records now exist at all three levels of government without adequate guidance at any level for their design, creation, maintenance, or disposition. The major federal electronic records systems have been combined into the Food Stamp Integrated Information System (GSPIIS), with a few subsystems (such as the National Data Bank and Profiles of Households) designated as records with permanent value. The state-based systems are the key recordkeeping vehicles for the daily administration of food stamp benefits, accumulating data and producing reports on which the whole program depends. None of the electronic records at the state level, and only a few at the federal level, are currently designated for permanent retention.

The pace of change in information technology has accelerated in the last decade. The purpose of earlier automation efforts was to speed processing and reporting, with official file copies still maintained in paper form. The use of technology has now matured to the point at which it is transforming the recordkeeping process itself. In Tennessee, the first Food Stamp "paperless" office has established electronic, not paper, case files and transformed the application process into an interactive on-line exercise. The use of Electronic Benefit Transfer (EBT) is spreading, probably leading to the elimination of another

source of paper recordkeeping, the Food Stamp Coupon itself. The traditional reliance on paper, and on signatures on paper, for official file or legal purposes is about to change. In Tennessee the paper case files now contain only one page with an applicant's signature—everything else is kept in electronic form. The next step will be to depend on the electronic system for the maintenance of the signature as well.

If electronic systems are to function as recordkeeping systems, archivists and records managers must begin to participate in the design of those systems. The Food Stamp Project Report integrated archival functional and legal admissibility requirements to produce a list of recommended system design and maintenance criteria for electronic systems. These recordkeeping requirements were titled "Guidelines for Legal Admissibility." Project members believed that functional requirements for recordkeeping and legal admissibility requirements for electronic records were fundamentally similar, and that the title used would lead to more acceptance of the proposed guidelines in the information technology community. The "Guidelines" describe requirements under System Characteristics, System Documentation, and Systems Operation categories, with the last category subdivided under Data Maintenance, Output Records, and Security.

Finally, the project recommended that these "Guidelines for Legal Admissibility" be added to the federal FSP Model Plan, which is published in the *Code of Federal Regulations*<sup>17</sup> and must, by law, be implemented in all state and territorial electronic systems. This recommendation is still under consideration. In the anti-regulatory atmosphere of the current political climate, few new regulations are being proposed and many prior regulations are being downgraded to guidelines. If this regulation is implemented, it would set recordkeeping standards in place for all electronic systems of the Food Stamp Program at the state and local levels, a classic example of the success of "steering" (by influencing federal guidelines) rather than "rowing" (trying to influence system designers in all state and local FSP offices).

**Results.** Project members presented a final briefing and report<sup>18</sup> to assistant administrators of the Food and Consumer Service on April 11, 1995. The findings of the report were immediately accepted. The FCS distributed the report to every state and territorial Food Stamp Program office in the United States—an unusual visibility and distribution for a records management research report. The Assistant Secretary of Agriculture sent letters of appreciation to the governors of the six participating states, recognizing the contributions to this project made by the state archives and state Food Stamp Program offices. These letters produced other appreciative notes and letters from governors to state archivists and publicity about the state's records management program in newsletters. In one state, the information technology director initiated a Government Information Locator Services (GILS) project with the state assistant archivist after being impressed with the report ("Did archivists really write this?" he asked<sup>19</sup>).

<sup>17</sup> C.F.R. 272.10(b).

<sup>18</sup>The *Food Stamp Records Project Report* is available from NAGARA Membership Services, 48 Howard Street, Albany, N.Y. 12207 (telephone 518-463-8644).

<sup>19</sup>Reported by Kathryn Hammond Baker, Assistant Archivist for Records Management, Commonwealth of Massachusetts.

Figure 3. Food Stamp Program Functions/Processes

Function/Activity	Federal-Hdqs	Federal-Regional	Alabama	Massachusetts	South Carolina	Utah	Virginia
Food Stamp programs are carried out by: <sup>1</sup>	U. S. Food and Consumer Service (USDA)	7 regional offices & subordinate field offices	Dept. of Human Resources—Food Stamp Division & local offices	Dept. of Public Welfare & 46 local offices	Dept. of Social Services & 46 local offices	Office of Family Support & 23 local offices	Dept. of Social Services, Div. of Benefit Programs & 124 local govt. offices
1. Establish uniform eligibility standards & other policies	7 CFR Chp. 2; Food Stamp Act 1977 + amendments	same	Title 38, AL Code; Admn. Code Chp. 660	Chp. 18, Sec. 2, General Laws	intgov'tal agreement signed by governor	Title 62A, Chp. 1 & 9 Utah Code & Admin. Rules R513-411	Sec. 63.1-25.2, VA Code
2. Review & monitor administration of FCS & accomplish quality control	general oversight at national level	direct oversight of states in region	oversee state satellite offices at local level	oversee state satellite offices at local level	oversee state satellite offices at local level	oversee state satellite offices at local level	oversee network of local government offices
3. Produce & distribute food coupons or other methods of benefit distribution	coupons produced by contractors under direction of HQ	no role, other than to receive and transmit state requests for coupons	state & local offices accountable for secure storage & accurate distribution	state & local offices accountable for secure storage & accurate distribution	state & local offices accountable for secure storage & accurate distribution	state & local offices accountable for secure storage & accurate distribution	state & local units accountable for secure storage & accurate distribution

<sup>1</sup>Refers to offices dispersed geographically within a state, whether satellite state offices or local political entities representing county, municipal, regional, or tribal governments.

Figure 3 (Continued). Food Stamp Program Functions/Processes

Function/Activity	Federal-Hdqs	Federal-Regional	Alabama	Massachusetts	South Carolina	Utah	Virginia
4. Certify & review wholesalers & retailers	guidelines & database by HQ	field offices certify & conduct investigations where necessary	no role	no role	no role	no role	no role
5. Conduct interviews, process applications & certify applicants	regulations provide guidance	no role	state procedures & training; local function	state procedures & training; local function	state procedures & training; local function	state procedures & training; local function	state procedures & training; local function
6. Conduct employment & training activities for FS recipients	require biennial reports	receive biennial reports	state plan, implemented at local level	state plan, implemented at local level	state plan, implemented at local level	state plan, implemented at local level	state plan, implemented at local level
7. Investigate and resolve intentional & unintentional program violations	national database of disqualifieds & receive reports of claims & violations	fraud investigations reviewed by compliance offices in region	state investigations & fair hearings; local reports & tracking	Dept. of Public Safety handles fraud investigations	state investigations & fair hearings; local reports & tracking	state investigations & fair hearings; local reports & tracking	state investigations & fair hearings; local reports & tracking



There were also articles about this report in unusual places for records-related matters. *Federal Computer Week* provided several complimentary paragraphs, and *Government Computer News* provided a half-page feature.<sup>20</sup>

In addition to the public relations value of the project, the recommendations have begun to be implemented in significant ways. Recommendations relating to electronic signatures were referred to federal legislative committees and reflected in the 1996 statute reforming the Food Stamp and other public assistance programs. Series and retention periods identified in the model schedule have been integrated into both federal and state records retention schedules. In implementing the report's retention recommendations, Massachusetts reported that it had destroyed approximately 75 million pages of temporary records already retained far beyond recommended retention periods, at an annual savings in storage costs alone of over \$100,000.

### Future Plans

In 1995, NAGARA distributed a survey to the directors of state archives or records management programs asking about their interest in future intergovernmental scheduling projects and their recommendation of focus areas for such projects. Almost all expressed an interest in participating in such projects in the future and recommended focus areas. After discussion and analysis, the decision was made to focus on criminal records. In 1997 I secured the agreement of the FBI's Criminal Justice Information Systems division to participate in a cooperative intergovernmental scheduling and appraisal project focusing on criminal justice records. Grace Lessner, Library of Virginia, agreed to serve as the chair of the Criminal Records and Information Management Enterprise Project. In July 1996, the "Project C.R.I.M.E." group held its first organizational meeting at the NAGARA annual conference in Washington, D.C., with nine state and local government representatives attending as well as representatives from NARA. The group also attended orientation sessions at the FBI and the Department of Justice's Office of Justice Programs. In March 1997 FBI officials sent letters endorsing the project to the participating state and local criminal justice officials, opening the doors for state and local project archivists and records managers. Project participants include the states of Georgia, Kentucky, Massachusetts, Minnesota, South Carolina, Utah, and Virginia; the cities of Dallas and Philadelphia, the counties of Salt Lake (Utah) and Rome/Floyd (Georgia), and NARA.

The objectives of Project C.R.I.M.E. are to identify recordkeeping problems and propose solutions to state and local law enforcement and criminal justice officials, develop a model records retention schedule or standard for criminal justice records and any attendant recordkeeping systems, and promote the importance of intergovernmental cooperative projects by disseminating information regarding the project's work throughout the criminal justice and archival/records management communities.

### Conclusion

There have been many calls for cooperative action by archivists, particularly for government archivists whose records are often closely related because of the interactions

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<sup>20</sup>"Report Hits Federal and State Food Stamp Record Keeping," *Federal Computer Week* (23 October 1995): 3a; "Feds and States Unite to Unclog 500-million-page System," *Government Computer News* (19 February 1996): 12.

within the federal system. The Intergovernmental Records Program of the last decade, a NAGARA/NARA partnership, has experimented with practical applications of these ideas to the management, description, and preservation of and access to divided, duplicated, and parallel types of intergovernmental records, both historical and modern. For historic records, the immediate result has been improved access in a national bibliographic database. For modern records, archivists and records management have had the opportunity to work in new types of partnerships across organizational, jurisdictional, and professional boundaries for the development of improved records management practices. There is much more that could be done and should be done, but the efforts of the IRP and its partners in the last decade have brought invaluable experience and created models that can be used to develop the next stages of experimentation and partnership.

The summer 1997 issue of the *NAGARA Clearinghouse* included a report by Grace Lessner, Library of Virginia and chair of Project C.R.I.M.E., on the progress of the most recent ICAP intergovernmental cooperative endeavor. Lessner concludes by reiterating the value of such cooperative work: "While we conduct this CRIME study, we are again struck by the need for such work, by the usefulness of joining forces across government jurisdictions to consolidate our information, the efficiency of banding together, and in particular, the importance of our responsibility as records managers and archivists to provide knowledgeable guidance on maintaining and preserving government records."<sup>21</sup>

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<sup>21</sup>Grace Lessner, "News from the CRIME Scene," *NAGARA Clearinghouse* 13 (Summer 1997): 4.