

Courtney Bailey

INLS 755-001

24 April 2012

### Identity in Flux: The Evolution of the Selection and Retention of Business Records

Business records have existed since the settlement of North America, but they have struggled to carve out an identity, both in the sense of their primary uses and their appropriate custodians. Each of these factors is inextricably intertwined with the appraisal of business records, for it is impossible to disentangle the selection of records from the professionals tasked with making these decisions and from their expected uses. Whereas the Jenkinson model of a detached caretaker dominated the earlier years of collection, the explosion of business records post-World War II necessitated a reformulation of appraisal priorities and coincided with a shift toward in-house repositories of business records. By reviewing the literature about the appraisal of business records and analyzing the problems in the field alongside the factors that have effected change, it becomes evident that in the second half of the twentieth century and the early twenty-first century, the focus of acquisitions has shifted from those records emphasizing the heritage and unique contributions of the company to those records merely fulfilling certain statutory or fiscal responsibilities, leaving a bleak outlook for business archives and their users.

Some confusion about business records stems from a problem of vocabulary. Many writers in the modern era draw a distinction between records management, as the maintenance of active and semi-active records in a business, and corporate archives, where “old” records are laid to rest. For the purpose of this paper, the term business records will encompass records in all stages of their life cycle, and the term business archives will connote a records center that is housed within the business itself.

Although this paper will focus on the appraisal of business records within business

archives<sup>1</sup>, a brief overview of the broader history of the collection of business records will provide an important grounding. The first organized evaluation of the preservation of business records came out of the Business Historical Society (BHS) at Harvard Business School in the 1920s. According to Michael Nash, the BHS promoted scholarship that was “conservative and probusiness in orientation” in an effort to counterbalance the writings of Progressive muckrakers.<sup>2</sup> In writing about the importance of preserving business records, Ralph M. Hower, a Harvard Business School professor, suggested three primary reasons for maintaining business records: (1) use by the firm, (2) historical study, and (3) use by the general public.<sup>3</sup> Hower went on to elaborate on these three potential uses of records. As for the business uses of these records, he suggested that progress is not possible unless firms can reference their prior mistakes and successes and learn from that past. He asserted, “Analysis of comparatively long-time changes and developments throws much light upon current problems and provides invaluable guidance in formulating future policies.” Hower believed that business records provided a much more reliable source of institutional memory than that of the mind of the executives.<sup>4</sup> He suggested that business records could have legal benefits in settling disputes over patents or copyrights and that they could contribute to advertising campaigns and business milestone celebrations and generally add to the prestige of the firm and the morale of the employees.<sup>5</sup> Writing in the midst of the Great Depression and coming after an era of muckraking investigative journalists that sought to expose the greed and corruption of the modern American corporation, Hower challenged firms to make their records accessible to the public so that the contributions and achievements of business could readily be seen, not just the mistakes evident in court records and government investigations. Given the climate of the Great Depression that made people more likely to assume the inherent badness of business, Hower called on firms to work to overcome the lack of knowledge about business history.<sup>6</sup> Hower included specific recommendations about the types of business records that should be retained, including accounting records, purchasing

and production information, inventory records, labor and personnel records, sales and advertising records, and general company records.<sup>7</sup> He also suggested sampling to be an appropriate method of minimizing the quantity of records.<sup>8</sup> In a chapter for a 1984 book, historian and archivist Francis X. Blouin, Jr., acknowledged the importance of Hower's 1937 pamphlet but also criticized it on a number of grounds. He considered it to have been too broad in scope and too focused on the individual firm rather than on the broader themes of business climate and culture.<sup>9</sup> Yet he applauded the BHS environment that shaped the work of Hower, arguing that for modern business records programs to be successful, there will have to be a reuniting of the interests of executives, archivists, and historians that had previously coalesced under the BHS.<sup>10</sup>

Many of the early business archives, such as those at Ford and Firestone, were established when the founding families were still actively involved in the businesses and recognized a need to preserve and perpetuate their legacies. Their first archivist, William Overman, cited the Firestones as believing “history often provides cheaply experience which originally cost dearly.”<sup>11</sup> World War II and the concomitant expansion of American business also contributed to the climate that made it logical to accumulate business records to demonstrate the important role of business in the war. Archivist and historian Oliver W. Holmes wrote a letter to Overman in 1941, saying, “As wars become more and more an industrial matter, business records become as important as the records of military organizations to the historians appraising a nation's defense effort.”<sup>12</sup> According to history and archives educator Julia Niebuhr Eulenberg, Harvey S. Firestone, Jr., “realized that the wartime production records of business and industry could provide important primary sources for future historians writing about the war effort in the United States.” He wound up creating a part of his corporation that not only helped historians but also aided in public relations campaigns and generated reports about projected growth for the company.<sup>13</sup> Blouin credited Arthur Cole, the librarian of the Harvard Business School, for his analysis in the 1940s that due to the mushrooming quantity of business records, the business

community would have to assume responsibility for their preservation.<sup>14</sup> Eulenberg pointed out that the result of the shift from primarily academic repositories holding archival business records to primarily business archives operating in-house was a less scholarly and more internally focused entity that perceived public access more as an afterthought or public relations tool.<sup>15</sup> She went on to suggest that “corporate memory is only as good as its records; and without good, complete records of its past experience, a company may continue to repeat past mistakes.”<sup>16</sup> Eulenberg concluded that a business archives can help a corporation in many ways: “sales promotion, employee training and information programs, review of marketing strategies, legal support, and the development of a corporate identity.”<sup>17</sup>

Yet the early model of business archives did not immediately catch hold, with more businesses creating museums than archives in the 1940s and 1950s. Even more unfortunate, the archivists in these early business archives did not contribute much to the literature of appraisal. Overman provided this analysis:

The business archivist should have considerable academic training in history, political science, or related subjects such as economics and statistics. He should know the content of the records in his care and have them under control for ready reference and daily use by administrative officials and others in the organization. After some time he will have gained valuable experience of the use, both administrative and historical, of records in his custody. The fund of knowledge thus gained will better enable him to perform what is probably the most difficult of an archivist’s tasks; that is, the appraisal and selection of records for permanent preservation.<sup>18</sup>

In providing guidance for appraisal of business records, Eulenberg suggested that the “goal should be to document all of your organization’s history. The materials you collect should include stories of individuals, work groups, projects, products, mergers and even company failures. You may choose to collect written documents, photographs and even physical items.”<sup>19</sup>

Academics did provide some additional guidance in the realm of appraisal in the 1960s. Writing in 1961, Harvard business professor Arthur M. Johnson suggested that two questions should guide the appraisal of business records: “‘What is distinctive about this industry? – About this company?’” He went on to suggest that a special effort should be made to preserve “records that reveal the human factor in the firm’s history.”<sup>20</sup> Johnson expressed his dismay that businesses seemed less likely to preserve records, out of fear of potential antitrust prosecution that could be aided by internal documents, and that the presumed purpose of business records had shifted from a more scholarly, historical focus to one of public relations. Johnson outlined the benefits of an objective historical review of business records: (1) the chance “to learn from the past,” (2) the opportunity to learn from failures as well as successes, (3) the importance of maintaining a complete record, and (4) the chance to benefit from the experiences of the firm.<sup>21</sup> Having first delivered this paper at the 1960 meeting of the Society of American Archivists (SAA), Johnson concluded by challenging archivists and historians to begin to work together to identify and maintain significant business records.<sup>22</sup> When Harvard business school professor Ralph W. Hidy spoke at the 1964 SAA annual meeting, he suggested the following types of documentation should be preserved: legal documents, statistical data, correspondence (especially from top-level executives), and memos and correspondence “on outside activities of the executives” to demonstrate how outside connections influenced their decisions within the firm.<sup>23</sup> Yet overall, this decade is one that was described by archivist David R. Smith as the “doldrums” for business archives.<sup>24</sup>

Smith argued there was a resurgence of interest in business archives in the 1970s for many reasons. For example, events such as the bicentennial contributed to a climate of nostalgia; a poor economy resulted in many historians who needed jobs and were willing to work for corporations; and increasing lawsuits against corporations necessitated having better control over and access to business records.<sup>25</sup> Ford Motor Company archivist Elizabeth Adkins offered

another key factor that led to the growth of business archives in the 1970s: an increasingly transient workforce, which necessitated a methodical way to preserve institutional memory.<sup>26</sup> Yet even in the midst of this supposed growth, archivist Edie Hedlin reflected the older emphasis on uniqueness in writing her 1978 work *Business Archives: An Introduction*. She asserted, “Records that document the programs, policies, or decision-making processes of an organization are more valuable than those that reflect routine functions.”<sup>27</sup> She approached her analysis from the viewpoint that business records would receive primarily historical use and suggested that historians would “need to know why an organization was formed, what its priorities were, who wielded major influence, why the company succeeded or failed, how it expanded, how it adapted to new technology or changing markets, and how the company views itself.” The specific records Hedlin suggested accumulating included “board of directors minutes, committee reports, annual reports, budget breakdowns, internal and external correspondence, policy and procedural manuals, special project reports, strategic planning statements, and organization charts.”<sup>28</sup>

In his 1979 review of Alfred Chandler’s groundbreaking work *The Visible Hand*, Blouin suggested that three factors determine the retention of business records: “(1) the size of capital investment, (2) the volume of business, and (3) the number and diversity of employees.”<sup>29</sup> In reflecting on Chandler’s analysis of the development of the modern American corporation, Blouin concluded that in the beginning, business records were used primarily for descriptive purposes, but as business models became more complicated, the records increasingly were used for analytical purposes: “records became a tool to assess past performance of employees, to anticipate changing market behavior based on past performance, and to satisfy other corporate needs for information.”<sup>30</sup> In addition to the records of informational and evidential value that were identified by Schellenberg, Blouin credited Chandler with identifying a new type of “functional record” that would “indicate a functional relationship between one branch and another, or the record itself would indicate the requirement for a certain kind of information.”

Foreshadowing documentation strategy, Blouin concluded that the appraisal of business records would need to acknowledge the reasons why records were created in order to evaluate their significance.<sup>31</sup>

After the formation in 1979 of the Business Archives section within the Society of American Archivists<sup>32</sup>, increasing attention has been paid to the principle of records management within the business world. In a 1982 book entitled *Records Management*, two business professors classified records into four categories: vital, important, useful, and nonessential. They went on to elaborate three primary uses for retained records: historical, legal, and operational (i.e., financial, fiscal or administrative).<sup>33</sup> Later in the book, they included a record utility checklist that also incorporated the categories of investigational value, research value, and supporting value.<sup>34</sup> This example highlights the confusion surrounding the scope and even the terminology used in the realm of business archives; however, there is a fairly general agreement about five categories of business records: operational, administrative, fiscal, legal, and historical.<sup>35</sup> Operational records are by their very nature current, while the others are retained after their active period. Of the remaining four categories, administrative records generally have the shortest retention period. There are also two primary factors commonly cited to explain why businesses are hesitant to maintain their records: cost and liability.

According to archivist Michael A. Lutzker, by the 1980s, there was more of an inclination within the archival community to look to other disciplines for guidance, including not only history but also sociology, psychology, and public administration.<sup>36</sup> Lutzker used Max Weber's analysis of the development of the modern bureaucracy as a jumping off point for questioning how the developing bureaucracy affected the records being generated.<sup>37</sup> He concluded that there are a number of ways that a sociological analysis can contribute to archival thinking: "to recognize that some records fulfill a purely ritual function; to understand that not all the policy decisions are made at the top of the organization, that conflicting policies can produce records

reflecting quite different realities, and that outside forces in the organization's environment affect its records creation."<sup>38</sup> Although perhaps "moving" toward appraisal, his details were lacking.

A 1982 article in *Newsweek* indicated that a trend in the business world was to hire historians to work in-house, basically in the role of archivists. The benefits cited for hiring these specialists included a longer-term perspective, marketing and advertising uses, insight into how and why prior decisions were made, and "simply keeping firms from repeating previous mistakes."<sup>39</sup> Although this is an interesting echo of the thoughts of Harvey Firestone, the only evidence of a firm embracing this wider role was AT&T. Marcy G. Goldstein cited AT&T as an example of a corporation that actively used its archives to help shape its public image in the wake of its downsizing in the 1980s, but she also acknowledged that it was exceptional, having "nearly twice as many responsibilities as other similar company archives."<sup>40</sup> At the other end of the spectrum, three certified records managers wrote *Information and Records Management* in 1987, and they took a rather minimalist approach to the selection of business records. They cautioned that "decision makers should avoid the just-in-case syndrome, and recognize that minimum risks can be balanced with benefits of disposal. The goal is to retain records for only as long as they serve the good of the organization. Large risks should not be taken, and small risks should be offset by substantial benefits."<sup>41</sup> Proving substantial benefits within the business environment became increasingly difficult for archivists.

By the 1990s, the predominant focus shifted strongly towards the legal issues involving the retention of documents: both in the sense of meeting statutory obligations for preserving records but also in the sense of disposing of records in a timely and approved process so that said documents could never be demanded during discovery. Susan Z. Diamond listed three types of costs associated with records retention: (1) the physical space, (2) the cost of production during discovery, and (3) the liability that may result from an old document that could have been destroyed earlier in compliance with a records retention schedule.<sup>42</sup> In fact, there was recognition



that remembering could in a sense be bad for the corporate bottom line. Brian Murphy contended that attorneys refer to e-mail as “evidence mail.”<sup>43</sup> Christopher T. Baer concluded that “‘perpetual memory’ is not seen as a universal good. Some things need to be forgotten, and not just closeted skeletons. Most business firms are obligated to periodically ‘reinvent’ themselves in response to changing external conditions if they are to survive. There is nothing ‘perpetual’ about them. Memory is often an impediment to change, to new ways of doing and thinking.”<sup>44</sup> These fears about destroying the proper documents reached such a pitch that there was even a liability insurance policy that was marketed – the “destruction of organizational records” or DOOR policy – that would “cover awards, settlements and legal fees stemming from the destruction of documents.”<sup>45</sup> Occasionally, there are success stories for the business records community, such as Ford Motor Company being able to prove that their leadership was not complicit in the use of slave labor during World War II. Yet on the other end of the spectrum, there are catastrophes like JPMorgan Chase being forced to apologize, due to records found in its archives, for its historical links to slavery.<sup>46</sup> Although it was hardly a thorough investigation, in speaking to a corporate attorney, the author discovered that his tendency is to destroy all documents as soon as their retention periods expire – for the reason that if those documents are “discovered” many years later during litigation, it would be too difficult to explain prior decisions and policies when the participants are likely no longer under the employ of the company. So even if the evidence would not be outwardly damaging, the effort to root out explanations would be too costly.<sup>47</sup>

Increasingly, the language used to describe the work of the business archives became records retention programs. The common steps in a records retention process include (1) a survey of the records in existence, (2) an appraisal of the records<sup>48</sup>, (3) the creation of a records retention schedule (resulting in official approval by management), and (4) the handling of the transfer and disposition of records. Most sources settled on a quantity of around three to five

percent of the overall records that merit long-term retention.<sup>49</sup> Although there continued to be discussion in the literature about the importance of corporate memory, preserving records of historical value increasingly seemed to be an afterthought, and most of the citations dated back many years. A few voices still tried to trumpet the cause of maintaining a complete record, such as oral historian Philip Cantelon, who explained that “oral histories can be a critical supplement to the written record, for the ‘hows’ and the ‘whys’ of decision making are rarely kept on paper. The fact that a particular policy was made and adopted may be clear, yet often the reasons behind its formulation and adoption are obscured by the passage of time or the reasons are just forgotten.”<sup>50</sup> This precisely addresses the concern raised by the corporate attorney, but this sort of corporate memory is clearly not a priority for most businesses today.

The ideas of functional appraisal have remained in discussion, though not always with universal approval. In the 1990s, Bruce H. Bruemmer preached its superiority to the “accidents of evidence” method that resulted from unsolicited donations or records surveys or the holes left in the records collected via retention schedules. Rather than starting with the existing records, as some theorists have suggested, Bruemmer asserted that the first step was to identify the basic function of the corporation and determine what information was necessary for documentation. He explained that “this raises the possibility of locating similar information in the records of other departments, in other forms of documentation (audio/visual, publications, data bases), or of creating documentation to fill the void (oral history).”<sup>51</sup> Some have taken to calling this the “big bucket” strategy for records retention, though when the talk centers around having between one hundred and five hundred “buckets” and still having numerous exceptions that are hard to fit into these buckets, this seems to be less manageable.<sup>52</sup> Brian W. Hill has suggested one mechanism that might facilitate this process, at least for e-mail: allow workers to “drag and drop” e-mail into buckets, where the records would then receive further classification and retention, if appropriate.<sup>53</sup> Paul C. Lasewicz, former archivist for Aetna and IBM, wrote in 1997:

Traditionally, the corporate archives has positioned itself within a company as a collector of material that documented the growth and development of the company. In practice, this has almost always been an unreachable ideal as business needs, company size, organizational alignments, and limited resources made a complete fulfillment of this objective difficult (if not impossible) from a purely practical perspective. Nonetheless, the concept of impartial historical primacy – that the archives chief utility to a corporation and society is as a historical resource – remains the noble goal to which most business archives appraisal theory still aspires.<sup>54</sup>

He went on to criticize structural appraisal for being too inflexible and functional appraisal for documenting much more than the company will ever need.<sup>55</sup> Also writing in 1997, Elizabeth Adkins, former archivist at Ford Motor Company, called for a uniquely business archives approach to appraisal, due to the fact that documents are requested moreso for informational than evidential purposes.<sup>56</sup> Bruemmer pointed out that this Schellenbergian focus on informational value does not mesh well with functional analysis. He concluded that business archives “question the continuing value of records when the function, process, or product ends.”<sup>57</sup>

Electronic records began receiving significant attention in the literature as early as the 1980s. Canadian archivist Terry Cook, writing in 1994, cited a report from the United Nations Advisory Committee for the Co-ordination of Information Systems, which concluded: “Electronic records exactly like their paper predecessors are needed by any corporate body not just for increased productivity, but also (and this is worth memorising) for ‘management accountability, operational continuity, legal evidence, disaster recovery, and ‘institutional memory.’”<sup>58</sup> Donald S. Skupsky saw a way to lasso electronic records into the functional analysis methodology, suggesting that there be a “functional, relational records retention schedule” that was organized around business functions and “consists of a series of related reports or tables.”<sup>59</sup> Carolyn Ashe and Chynette Nealy cautioned that identifying the appropriate

electronic records for retention can be quite complicated, especially due to the transitory nature of some documents as well as “the fact that the content of an authoritative business record may change over time.”<sup>60</sup> While some have argued that electronic records deserve unique treatment, Brian Murphy suggested that e-mail records be subjected to the same retention schedule as paper documents. He cautioned against the use of automatic e-mail purges, either based on a schedule or mailbox size limits, because they prevent the consistent implementation of company retention policies.<sup>61</sup> Jan Rosi pointed out a similar complication of electronic records: non-compliance with records retention policies “due to the current lack of control in the digital environment where most business documentation is being generated.”<sup>62</sup> Yet even with the dramatic increase in electronic records, the appraisal ideas introduced by Schellenberg in the 1950s have not lost their weight; Charmaine Brooks invoked his methodology with this summation: “All records have a primary purpose – why they were created or received. This is the operational requirement and will be defined by the business purpose. Some records will have a secondary purpose, generally legal, regulatory, or historical. Records that do not have a secondary purpose can and should be destroyed as soon as the operational requirements are met.”<sup>63</sup> Yet this knowledge does not prevent the retention of non-records. Susan Cisco, director of a content and records management services organization, suggested that most information retained by organizations falls into the category of non-records: “duplicates, superseded records, draft versions, content that has exceeded its retention period, and orphaned documents from employees who have left the organization.”<sup>64</sup>

One of the major problems for business archivists, as already noted, is that of terminology. Another issue has to do with the status and location of archivists within the corporate hierarchy. Archivist Douglas A. Bakken noted that some archives exist under the authority of a Vice President of Industrial Relations and Personnel, while others might be “an adjunct of a corporate library of a general services department” and still others fall under the

authority of the corporate secretary's office.<sup>65</sup> In addition, although much of the appraisal literature is written with one eye toward them, business historians have not been consistent users of business records. Michael Nash cited numerous scholarly works about business, and with the exception of the work of Ralph Hower in the 1930s, the tendency has been to use published sources rather than business records as documentation.<sup>66</sup> Blouin argued that by the 1980s, there was a noticeably steep decline in the academic use of business records, so the two primary extant forces encouraging the continued retention of business records were "corporation size and federal regulations." He elaborated that as corporations grew larger, there were more vital records that needed to be maintained in case disaster struck and the company had to be reformed, while the expansion of federal regulations forced companies to document their policies and practices in a variety of ways.<sup>67</sup> He concluded that two factors dominated appraisal guidelines in businesses: "(1) the climate of litigation in modern U.S. society; and (2) federal and state government regulations."<sup>68</sup> He suggested five elements that should be included in any proposed solution for the appraisal of business records: "(1) an understanding of the structure of the modern firm; (2) an understanding of the relationship between structure and records generated; (3) an appreciation of the breadth of historical research; (4) a revival of a coalition of interests; and (5) an appreciation of appraisal as an intellectual question."<sup>69</sup> Where many of the earliest business records had been collected with an eye toward the individual firm, Blouin suggested that appraisal decisions needed to consider the bigger questions of where a company fit into the growth of American business.<sup>70</sup> In order to enable the wise selection of materials, Blouin suggested the broad publication of case studies so that others could learn from those experiences along with a study of the statutory requirements for record retention.<sup>71</sup> Blouin argued that historical trends should guide appraisal policies, yet he also suggested that the trend by the 1980s had shifted toward the aggregate rather than the individual, so it is difficult to understand how this trend could be addressed by the archives of a singular business.<sup>72</sup> Picking up where Blouin

left off, Nash claimed that in the late 1980s and early 1990s there was a shift in the published literature back towards a focus on the entrepreneur and corporate culture.<sup>73</sup> A cursory glance at the citations of biographies such as those for Warren Buffett or Steve Jobs substantiates Nash's assertion, for they do not seem to have relied on business records for their evidence. Losing focus on who the users of business records are and how they use those records has certainly complicated the situation for business archivists. The final factor working against them is a loss of allies. Although some of the wounds may be self-inflicted, flare-ups like the 2003 "Raisingate" cover of *American Archivist* demonstrate that business archivists are still unsure of having the support of other archivists and of also having an unsullied professional reputation.<sup>74</sup> Some of this stems from what appears to be an unnecessary demarcation of responsibilities between records management and archives management.<sup>75</sup> As an example, William Saffady argued that

records managers are principally concerned with the business significance of recorded information. Archivists, by contrast, seek to preserve information of enduring value for historical, cultural, scholarly, or other research purposes. Their clientele includes historians, sociologists, public policy analysts, and genealogists, among others. Records may have considerable business significance but no archival value. Conversely, records may have archival value even though their business significance has elapsed.<sup>76</sup>

Bruemmer argued that the users of business records actually view the archivists as historians: "few corporate employees come to the archives to view records. They expect the archivist to synthesize and interpret data, and deliver information. In other words, the archivist *is* the historian."<sup>77</sup> Yet this user perspective is certainly not one that has been embraced in the archival community.

In reflecting on the history of business records, a number of factors emerge as game changers – occurrences that inexorably shifted the trajectory of the profession. As already

mentioned, the growth of big business throughout the twentieth century dramatically changed the scale of records that have to be handled as well as reconfiguring the corporate hierarchy. Yet there were no guarantees economic growth would continue, so archivists frequently felt they would be the first sacrificed during a downturn. During one such downturn, Rabchuk asserted that the overseas competition that dominated concerns beginning in the 1980s drove American corporations to embrace management theory, which, in turn, emphasized corporate culture.<sup>78</sup> While this could be another way for the business archives to define its existence, as the guardians of this corporate culture, it does not seem to have been fully embraced. Having a more transient work force has arguably also made the maintenance of corporate memory more significant, but once again, the necessity has not been universally recognized. Clearly the largest factor that has changed that realm of business records is the growth of business legislation and other federal regulations – for example, the Sarbanes-Oxley Act and the Health Insurance Portability and Accountability Act. With an increasingly litigious American society alongside mounting regulations, businesses feel compelled to be very precise to keeping everything required and nothing more.<sup>79</sup> Richard C. Berner, an archivist at the University of Washington at Seattle, cited a business archivist who lamented the inverse relationship between government regulation and document retention: “the more subject a firm is to federal regulation, the less likely will its most vital papers survive.”<sup>80</sup> It certainly appears that any view toward maintaining historical documentation has waned, although, as already cited, Blouin, among others, has suggested that archivists, historians, and businesspeople need to renew their coalition in order to improve the future. Since a business school led the movement in the early twentieth century, perhaps they could again take the lead.

So what does all of this mean for the future of business records and their appraisal? Many writers have kept listing the benefits of a sound records management program.<sup>81</sup> Yet despite all of the protestation that business archives are unique entities, there is still very little

literature that is specific to the appraisal of business records and there is no real agreement about the appropriate strategy. Adkins acknowledged that most of the intellectual work about appraisal has been contributed by historians and repository archivists rather than business archivists.<sup>82</sup> Business archivists will need to fill this void in order to gain some professional respect and to chart a course for their colleagues. As for the housing of business records, outside of the unlikely possibility of getting legislation passed that would declare business records to be public, and, therefore, protected, Berner suggested that encouraging businesses to establish their own archives and setting up regional records centers were the steps most likely to promote the retention of records.<sup>83</sup> Given the tendency of businesses to dispose of records, these records centers may be the only reasonable mechanism for saving some slice of business history, albeit a likely misshapen slice due to the fact that many records will have already been destroyed before accession takes place. Robert Williams, president of Cohasset Associates, argued in 2003 that a shift was occurring in records management “from a media-centric space reduction paradigm to content-centric risk reduction paradigm.”<sup>84</sup> Although this is a very narrow role for business archivists to fill, it does still appear to be an area of need.<sup>85</sup> If archivists could develop a means of providing context for the records that are in their care, this would go a long way toward resolving one of the key concerns of corporate attorneys. Probably the most compelling argument that there is still a vital role for business archivists came from Goldstein, who contended that with the rise of the modern corporation, two trends have emerged: the role of middle managers in communicating information from management to workers has been subsumed by computers, and the corporate structure is very fluid. As a result, it is important to have a robust and prioritized business archives that can “transform boxes of raw data in dusty files into useful information that can serve as a knowledge base for managerial decision making.”<sup>86</sup>

Two others have coalesced around this idea of knowledge management. Canadian



business archivist Rabchuk wrote in 1997:

Ours will always be a war for survival, and the idea that archives can ever achieve core status within the corporate structure is unrealistic. . . . At the end of the day, our best bet for survival will be the ability to demonstrate our information management skills and a familiarity with internal information networks. Our preoccupation with the past cannot be our sole *raison d'être*. . . . the glorification of our expertise in identifying and preserving lasting information sifted from the corporate ashes has been worthless without the ability to prove its utilitarian value. The corporate archivist of the next millennium will need to assume expanded responsibility in determining the larger corporate knowledge management policies and procedures.<sup>87</sup>

Paul C. Lasewicz agreed, suggesting “Knowledge management involves gathering internal information and combining it with related external data in order to: speed organizational access to information, eliminate redundant collection processes, enhance organizational synergies, and create structural intellectual capital.”<sup>88</sup> Business archivists have been accustomed to carving out a position and “selling” their worth – they now just need to create alliances and respond to the current corporate environment. And while business archivists are deciding how to chart their future, given the general distrust of big business in the United States today, it might behoove these corporations to take the advice of Hower and open a window into their records.

## Notes

1. For analyses of the appraisal of business records by an outside repository, see JoAnne Yates, "Internal Communication Systems in American Business Structures: A Framework to Aid Appraisal," *American Archivist* 48 (Spring 1985): 141-58; Mark A. Greene and Todd J. Daniels-Howell, "Documentation with an Attitude: A Pragmatist's Guide to the Selection and Acquisition of Modern Business Records," in *The Records of American Business*, ed. James M. O'Toole (Chicago: Society of American Archivists, 1997), 161-229.
2. Michael Nash, "Business History and Archival Practice: Shifts in Sources and Paradigms," in *The Records of American Business*, ed. James M. O'Toole (Chicago: Society of American Archivists, 1997), 12-13.
3. Ralph M. Hower, "The Preservation of Business Records," *Bulletin of the Business Historical Society* 11 (November 1937): 37.
4. *Ibid.*, 38.
5. *Ibid.*, 39.
6. *Ibid.*, 40-42.
7. *Ibid.*, 44-50.
8. *Ibid.*, 44, 49, 53-55.
9. Francis X. Blouin, Jr., "An Agenda for the Appraisal of Business Records," in *Archival Choices*, ed. Nancy Peace (Lexington, MA: D.C. Heath and Company, 1984), 62-63.
10. *Ibid.*, "Agenda," 75.
11. William D. Overman, "The Pendulum Swings," *American Archivist* 22 (January 1959): 5. Where upon first glance the title might imply that the trend toward business archives was growing, Overman was actually critical of archivists for failing to advocate appropriately along these lines, thereby causing the pendulum to swing away from the desired end.
12. *Ibid.*, 6.
13. Julia Niebuhr Eulenberg, "The Corporate Archives," in *Taking Control of Your Office Records: A Manager's Guide*, ed. Katherine Aschner (White Plains, NY: Knowledge Industry Publications, Inc., 1983), 183-84.
14. Blouin, "Agenda," 65. Up to this point in time, most archival business records were housed in academic repositories.
15. Julia Niebuhr Eulenberg, "The Corporate Archives: Management Tool and Historical Resource," *Public Historian* 6 (Winter 1984): 22.

16. Ibid., 30.

17. Ibid., 37.

18. Overman, 8.

19. Eulenberg, “Corporate Archives” (chapter), 185. She also included on page 187 a table that compared the concepts of vital records and archival materials:

**Table 12.2: Comparison of Some of the Documents Included in a Vital Records Program and a Corporate Archives**

Documents	Vital Records	Archival Materials
Minutes of significant meetings	X	X
Accounts receivable	X	
Journals	X	X <sup>1</sup>
General ledgers	X	X <sup>1</sup>
Stock certificates	X	X <sup>1</sup>
Sales and production records	X <sup>2</sup>	X <sup>1</sup>
Legal records	X <sup>3</sup>	X <sup>3</sup>
Organization charts	X <sup>2</sup>	X
Publications		X
Patent files	X	X
Blueprints and engineering drawings	X	X
Scrapbooks		X

<sup>1</sup>Often sample runs will satisfy archival collecting patterns.

<sup>2</sup>Current materials that could be used to reconstruct business operations, rather than historical records.

<sup>3</sup>Appropriate records for each category might not be the same, and might not include all legal records, for example.

20. Arthur M. Johnson, “Identification of Business Records for Permanent Preservation,” *American Archivist* 24 (July 1961): 330.

21. Ibid., 331.

22. Ibid., 332.

23. James E. Barrett, “Acquisition in Industrial Archives,” *American Archivist* 24 (July 1961): 334-35.

24. David R. Smith, “An Historical Look at Business Archives,” *American Archivist* 45 (Summer 1982): 275.

25. Ibid., 276.

26. Adkins, Elizabeth W., “The Development of Business Archives in the United States: An Overview and a Personal Perspective,” *American Archivist* 60 (Winter 1997): 12.

27. Edie Hedlin, *Business Archives: An Introduction* (Chicago, Society of American Archivists, 1978), 15.

28. Ibid., 16.

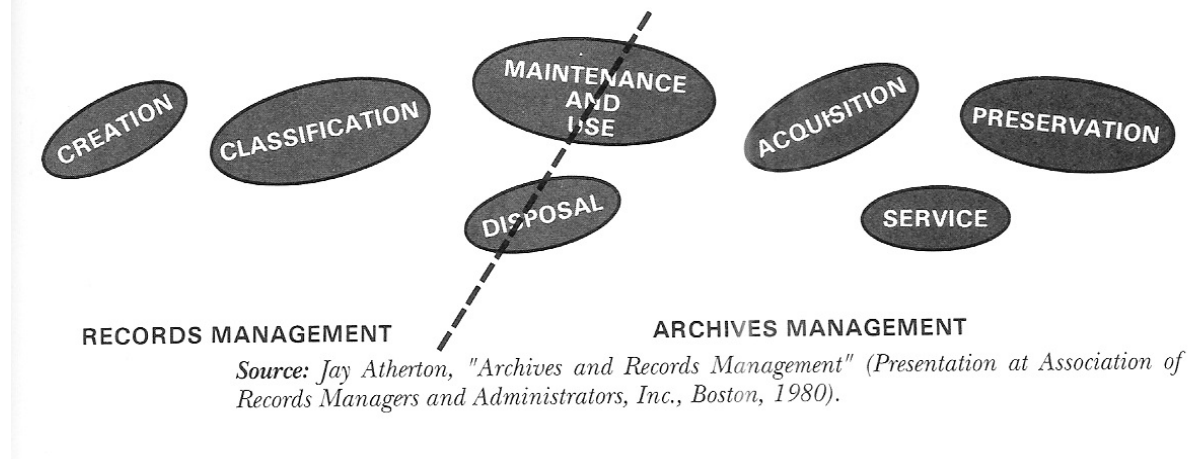
29. Francis X. Blouin, Jr., "A New Perspective on the Appraisal of Business Records: A Review," *American Archivist* 42 (July 1979): 317.
30. Ibid., 318.
31. Ibid., 320.
32. There had been a Business Archives committee created in 1938 and disbanded in the 1960s.
33. Irene Place and David J. Hyslop, *Records Management: Controlling Business Information* (Reston, VA: Reston Publishing Company, Inc., 1982), 41-42. These same categories were repeated in other volumes, including Joseph S. Fosegan, Mary Lea Ginn, and David G. Goodman, *Business Records Control*, 7<sup>th</sup> ed. (Cincinnati: South-Western Publishing Co., 1995), 5, 113.
34. Place and Hyslop, 264.
35. One such citation comes from Katherine Aschner, "Records Retention Scheduling," in *Taking Control of Your Office Records: A Manager's Guide*, ed. Katherine Aschner (White Plains, NY: Knowledge Industry Publications, Inc., 1983), 39.
36. Michael A. Lutzker, "Max Weber and the Analysts of Modern Bureaucratic Organization: Notes toward a Theory of Appraisal," *American Archivist* 45 (Spring 1982): 119.
37. Ibid., 126.
38. Ibid., 129.
39. Susan Dentzer, "Profiting From The Past," *Newsweek*, May 10, 1982, 73.
40. Marcy G. Goldstein, "The Evolving Role of In-House Business Archives: From Tradition to Flexibility," in *The Records of American Business*, ed. James M. O'Toole (Chicago: Society of American Archivists, 1997), 46.
41. Mary F. Robek, Gerald F. Brown, and Wilmer O. Maedke, *Information and Records Management*, 3d ed. (Encino, CA: Glencoe Publishing Co., 1987), 116. For additional perspective on risk/benefit analysis, see David O. Stephens, "Making Records Retention Decisions: Practical and Theoretical Considerations," *Records Management Quarterly* (January 1988): 3-7.
42. Susan Z. Diamond, *Records Management: A Practical Approach*, 3d ed. (New York: Amacom, 1995), 53.
43. Brian Murphy, "Preventing Mistakes in E-mail Records Management," *CPA Journal* 75 (July 2005): 14.

44. Christopher T. Baer, "Strategy, Structure, Detail, Function: Four Parameters for the Appraisal of Business Records" in *The Records of American Business*, ed. James M. O'Toole (Chicago: Society of American Archivists, 1997), 119.
45. Lori Block, "Which documents can be safely destroyed? Record retention on trial," *Business Insurance*, March 9, 1992.
46. For a fuller description, see Bruce H. Bruemmer, "Brown Shoes in a World of Tuxedos: Corporate Archives and the Archival Profession," in *Controlling the Past: Documenting Society and Institutions*, ed. Terry Cook (Chicago: Society of American Archivists, 2011), 167.
47. The interview was conducted in confidentiality, and the name of the interviewee is withheld by mutual agreement. Interview with corporate attorney, April 23, 2012.
48. The "Appraisal Task Force Report" from the InterPARES Project elaborated on the components in the appraisal process (for electronic records, in particular): "We have viewed appraisal as being made up of four distinct activities: compiling information about the records and their contexts; assessing the value of the records; determining the feasibility of preserving them; and finally, making the appraisal decision. This breakdown is based on a decomposition of appraisal into its logical component activities or functions, and it is not meant to specify a precise work flow." InterPARES Project, "Appraisal Task Force Report," *The Long Term Preservation of Authentic Electronic Records: Findings of the InterPARES Project*, 8, [http://www.interpares.org/book/interpares\\_book\\_e\\_part2.pdf](http://www.interpares.org/book/interpares_book_e_part2.pdf).
49. The highest range (4-10%) was found in Betty R. Ricks, Ann J. Swafford, and Kay F. Gow. *Information and Image Management: A Records Systems Approach*, 3d ed. (Cincinnati: South-Western Publishing Co., 1992), 84.
50. Arnita A. Jones and Philip L. Cantelon, eds., *Corporate Archives and History: Making the Past Work* (Malabar, FL: Krieger Publishing Company, 1993), 68.
51. Bruce H. Bruemmer, "Avoiding Accidents of Evidence: Functional Analysis in the Appraisal of Business Records," in *The Records of American Business*, ed. James M. O'Toole (Chicago: Society of American Archivists, 1997), 140-41.
52. Susan Cisco, "Big Buckets for Simplifying Records Retention Schedules," *Information Management Journal* (September/October 2008): 3-6.
53. Brian W. Hill, "Guiding Your Organization Through Murky Waters: Defining Your Retention Management Program," *Information Management* 43 (May/June 2009): 52.
54. Paul C. Lasewicz, "Riding Out the Apocalypse: The Obsolescence of Traditional Archivy in the Face of Modern Corporate Dynamics," *Archival Issues* 22, no. 1 (1997): 64.
55. *Ibid.*, 65.

56. Adkins, 20.
57. Bruemmer, "Brown Shoes," 158.
58. Terry Cook, "Electronic Records, Paper Minds: The Revolution in Information Management and Archives in the Post-Custodial and Post-Modernist Era," *Archives and Manuscripts* 22 (November 1994): 309.
59. Donald S. Skupsky, "Applying Records Retention to Electronic Records," *The Information Management Journal* (July 1999): 32.
60. Carolyn Ashe and Chynette Nealy, *Records Management: Effective Information Systems* (Upper Saddle River, NJ: Pearson Education, Inc., 2004), 16.
61. Murphy, 14.
62. Jan Rosi, "Retention, Records Management and Legal Compliance," supplement, *KM World* 14 (September 2005): S12.
63. Charmaine Brooks, "Records Management 101," *AIIM E-Doc Magazine* 21 (May/June 2007): 17.
64. Cisco, 5.
65. Douglas A. Bakken, "Corporate Archives Today," *American Archivist* 45 (Summer 1982): 284-86.
66. Nash, 24-34.
67. Blouin, "Agenda," 68, 71.
68. Blouin, "Agenda," 69.
69. Blouin, "Agenda," 71.
70. Blouin, "Agenda," 72.
71. Blouin, "Agenda," 73. The study of statutory regulations is no easy task. Even the "digest" form of the Code of Federal Regulations, the *Guide to Record Retention Requirements in the Code of Federal Regulations*, covered 550 pages and contained 45 sections in its 1994 edition. Office of the Federal Registrar, *Guide to Record Retention Requirements in the Code of Federal Regulations* (Washington, DC: General Services Administration, 1994).
72. Blouin, "Agenda," 74-75.
73. Nash, 29.

74. See Bruemmer's summary and analysis of the conflict in "Brown Shoes," 162-63.

75. See, for example, this figure by Jay Atherton that was cited by Ricks et al. on 311.



76. William Saffady, *The Value of Records Management: A Manager's Briefing – The Business Case for Systematic Control of Recorded Information* (Prairie Village, KS: ARMA International, 1999), 6.

77. Bruemmer, "Brown Shoes," 159.

78. Gord Rabchuk, "Life after the 'Big Bang': Business Archives in an Era of Disorder," *American Archivist* 60 (Winter 1997): 36-37.

79. For examples of "uh-oh" moments for American business archivists, see the product liability case against Remington Arms Co., Bill Gates' Netscape e-mail, Arthur Andersen's deletion/shredding of Enron materials, and the case against the tobacco companies.

80. Richard C. Berner, "Business Archives in Perspective," *Journal of Forest History* 18 (April 1974): 33.

81. See, for example, Saffady, *Value of Records Management*, v; Laurie Fischer, "Condition Critical: Developing Records Retention Schedules," *Information Management Journal* 40 (January/February 2006): 26; Terry Cook provides a top ten list of why records are important to any organisation, "Byte-Ing Off What You Can Chew: Electronic Records Strategies for Small Archival Institutions." *Archifacts* (2004): 1-20, [http://www.aranz.org.nz/Site/publications/papers\\_online/terry\\_cook\\_paper.aspx](http://www.aranz.org.nz/Site/publications/papers_online/terry_cook_paper.aspx).

82. Adkins, 19.

83. Berner, 34. Interestingly, this suggestion was made in the early twentieth century by Oliver W. Holmes, but it was set aside when it appeared to be more cost-effective to have businesses manage their own records.

84. James R. Dukart, "On the Road to Records Management," *AIIM E-Doc Magazine* 17 (May/June 2003): 29.

85. A few will not even concede this space. Nishan Desilva and Ganesh Vednere supported the idea of business-process-driven records management, through which the content, context, and structure of documents are recorded in the normal course of business rather than after the fact by trained specialists. "Benefits and Implementation of Business-Process Driven Records Management," *Infonomics* (November/December 2008): 52-55.

86. Goldstein, 42.

87. Rabchuk, 39-41.

88. Lasewicz, 71. Unfortunately for Lasewicz, he cited Arthur Andersen for having "one of the world's most advanced knowledge management systems."



## Bibliography \*

- Adkins, Elizabeth W. "The Development of Business Archives in the United States: An Overview and a Personal Perspective." *American Archivist* 60 (Winter 1997): 8-33.
- Aschner, Katherine, ed. *Taking Control of Your Office Records: A Manager's Guide*. White Plains, NY: Knowledge Industry Publications, Inc., 1983.
- Ashe, Carolyn and Chynette Nealy. *Records Management: Effective Information Systems*. Upper Saddle River, NJ: Pearson Education, Inc., 2004.
- Bakken, Douglas A. "Corporate Archives Today." *American Archivist* 45 (Summer 1982): 279-86.
- Barrett, James E. "Acquisition in Industrial Archives." *American Archivist* 24 (July 1961): 333-36.
- Benedon, William. *Records Management*. Englewood Cliffs, NJ: Prentice-Hall, Inc., 1969.
- Berner, Richard C. "Business Archives in Perspective." *Journal of Forest History* 18 (April 1974): 32-34.
- Block, Lori. "Which documents can be safely destroyed? Record retention on trial." *Business Insurance*, March 9, 1992.
- Blouin, Francis X., Jr. "An Agenda for the Appraisal of Business Records." In *Archival Choices*, edited by Nancy Peace, 61-79. Lexington, MA: D.C. Heath and Company, 1984.
- Blouin, Francis X., Jr. "A New Perspective on the Appraisal of Business Records: A Review." *American Archivist* 42 (July 1979): 312-20.
- Boles, Frank. *Selecting & Appraising Archives & Manuscripts*. Chicago: Society of American Archivists, 2005.
- Brooks, Charmaine. "Records Management 101." *AIIM E-Doc Magazine* 21 (May/June 2007): 16-18.
- Bruemmer, Bruce H. "Brown Shoes in a World of Tuxedos: Corporate Archives and the Archival Profession." In *Controlling the Past: Documenting Society and Institutions*, edited by Terry Cook, 151-70. Chicago: Society of American Archivists, 2011.

---

\* Citations are formatted based on the *The Chicago Manual of Style*.

- Cisco, Susan. "Big Buckets for Simplifying Records Retention Schedules." *Information Management Journal* (September/October 2008): 3-6.
- Cook, Terry. "Byte-Ing Off What You Can Chew: Electronic Records Strategies for Small Archival Institutions." *Archifacts* (2004): 1-20.
- Cook, Terry. "Electronic Records, Paper Minds: The Revolution in Information Management and Archives in the Post-Custodial and Post-Modernist Era." *Archives and Manuscripts* 22 (November 1994): 300-29.
- Cunningham, Patrick J. "IM: Invaluable New Business Tool or Records Management Nightmare?" *Information Management Journal* 37 (November/December 2003): 27-33.
- Dentzer, Susan. "Profiting From The Past." *Newsweek*, May 10, 1982, 73.
- Desilva, Nishan and Ganesh Vednere. "Benefits and Implementation of Business-Process Driven Records Management." *Infonomics* (November/December 2008): 52-55.
- Diamond, Susan Z. *Records Management: A Practical Approach*. 3d ed. New York: Amacom, 1995.
- Dukart, James R. "On the Road to Records Management." *AIIM E-Doc Magazine* 17 (May/June 2003): 28-31.
- Edmunds, Henry E. "The Ford Motor Company Archives." *American Archivist* 15 (April 1952): 99-104.
- Eulenberg, Julia Niebuhr. "The Corporate Archives: Management Tool and Historical Resource." *Public Historian* 6 (Winter 1984): 20-37.
- Fischer, Laurie. "Condition Critical: Developing Records Retention Schedules." *Information Management Journal* 40 (January/February 2006): 26-34.
- Fosegan, Joseph S., Mary Lea Ginn, and David G. Goodman. *Business Records Control*. 7<sup>th</sup> ed. Cincinnati: South-Western Publishing Co., 1995.
- Hedlin, Edie. *Business Archives: An Introduction*. Chicago, Society of American Archivists, 1978.
- Henry, Linda. "Schellenberg in Cyberspace." *American Archivist* 61 (January 1998): 309-27.
- Hidy, Ralph W. "Business Archives: Introductory Remarks." *American Archivist* 29 (January 1966): 33-36.

- Hill, Brian W. "Guiding Your Organization Through Murky Waters: Defining Your Retention Management Program." *Information Management* 43 (May/June 2009): 50-53.
- Hower, Ralph M. "The Preservation of Business Records." *Bulletin of the Business Historical Society* 11 (November 1937): 37-61.
- InterPARES Project. "Appraisal Task Force Report." *The Long Term Preservation of Authentic Electronic Records: Findings of the InterPARES Project*.  
[http://www.interpares.org/book/interpares\\_book\\_e\\_part2.pdf](http://www.interpares.org/book/interpares_book_e_part2.pdf).
- Johnson, Arthur M. "Identification of Business Records for Permanent Preservation." *American Archivist* 24 (July 1961): 329-32.
- Jones, Arnita A. and Philip L. Cantelon, eds. *Corporate Archives and History: Making the Past Work*. Malabar, FL: Krieger Publishing Company, 1993.
- Julien, Janelle. "The Retention Game." *AIIM E-Doc Magazine* 20 (September/October 2006): 29-31.
- Lasewicz, Paul C. "Riding Out the Apocalypse: The Obsolescence of Traditional Archivy in the Face of Modern Corporate Dynamics." *Archival Issues* 22, no. 1 (1997): 61-76.
- Lutzker, Michael A. "Max Weber and the Analysts of Modern Bureaucratic Organization: Notes toward a Theory of Appraisal." *American Archivist* 45 (Spring 1982): 119-30.
- Mat-Isa, Azman. "Risk Management and Managing Records." In *Record Keeping in a Hybrid Environment: Managing the Creation, Use, Preservation and Disposal of Unique Information Objects in Context*, edited by Alistair G. Tough and Michael Moss, 69-83. Oxford: Chandos, 2006.
- McCall, Emma T. "Notes on Handling and Preserving Company Historical Materials." *Special Libraries* (January 1955): 16-17.
- Medina, Richard and Linda Andrews. "Lessons Learned in Records Management." *AIIM E-Doc Magazine* 22 (March/April 2008): 18-19.
- Moss, Michael. "Archivist: friend or foe?" *Records Management Journal* 15 no. 2 (2005): 104-14.
- Murphy, Brian. "Preventing Mistakes in E-mail Records Management." *CPA Journal* 75 (July 2005): 14.
- O'Toole, James M., ed. *The Records of American Business*. Chicago: Society of American Archivists, 1997.

- Overman, William D. "The Pendulum Swings." *American Archivist* 22 (January 1959): 3-10.
- Place, Irene and David J. Hyslop. *Records Management: Controlling Business Information*. Reston, VA: Reston Publishing Company, Inc., 1982.
- Rabchuk, Gord. "Life after the 'Big Bang': Business Archives in an Era of Disorder." *American Archivist* 60 (Winter 1997): 34-43.
- Ricks, Betty R., Ann J. Swafford, and Kay F. Gow. *Information and Image Management: A Records Systems Approach*, 3d ed. Cincinnati: South-Western Publishing Co., 1992.
- Robek, Mary F., Gerald F. Brown, and Wilmer O. Maedke. *Information and Records Management*. 3d ed. Encino, CA: Glencoe Publishing Co., 1987.
- Rosi, Jan. "Retention, Records Management and Legal Compliance." Supplement, *KM World* 14 (September 2005): S12-13.
- Saffady, William. "Making the Business Case for Records Management." *Information Management Journal*, January/February (2011): 38-41.
- Saffady, William. *The Value of Records Management: A Manager's Briefing – The Business Case for Systematic Control of Recorded Information*. Prairie Village, KS: ARMA International, 1999.
- Skupsky, Donald S. "Applying Records Retention to Electronic Records." *The Information Management Journal* (July 1999): 28-35.
- Smith, David R. "An Historical Look at Business Archives." *American Archivist* 45 (Summer 1982): 273-78.
- Stephens, David O. "Making Records Retention Decisions: Practical and Theoretical Considerations." *Records Management Quarterly* (January 1988): 3-7.
- Stephens, David O. *Records Management: Making the Transition from Paper to Electronic*. Overland Park, KS: ARMA International, 2007.
- "Unified Records Management: A Necessity for Today's Responsible Enterprise." *AIIM Guide to ECM Purchasing* (2009): 6-9.
- Wolfsberg, Vernie H. "Building Company Archives." *Special Libraries* (January 1955): 13-15.