

BACK TO THE STRATEGIC ROOTS: APPRAISAL REFORM AT THE NATIONAL ARCHIVES OF CANADA

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ABSTRACT: Towards the end of the 1980s, the National Archives of Canada recognized that the methods it employed and the criteria it used to pass judgment upon the archival value of government records lacked strategic focus and intellectual consensus. In essence, the NA was largely stockpiling government records in *ad hoc* anticipation of their potential for historical research or other secondary uses, and deferring real decision making about their value and benefit to future generations of Canadians. This essay describes some of the thinking, processes, and elements behind an ongoing corporate appraisal renewal that has changed—in the most fundamental and profound manner—the way the NA assesses the archival value and, coincidentally, the operational-business disposition of government records as a public information resource. Having originally introduced an archival strategy of macro-appraisal, the NA has subsequently been obliged to rethink and recalibrate some of its first assumptions towards the taking of more refined and difficult records preservation decisions.

Since the early 1990s (officially since 1991), the National Archives of Canada has adopted a strategic approach to the archival appraisal of the records created by Canadian federal government institutions. The strategy—in my personal view—represents a very practical and highly discriminatory selection of documentation that is designed to provide comprehensive recorded illustration of how government formulates policy, takes decisions, delivers programs and services, and interacts with the civil constituency. In our institution, we call this strategy “macro-appraisal.”

As a manager formerly responsible for implementing macro-appraisal within a particular records disposition program portfolio, and now as the manager responsible for developing and pushing the strategy forward, I would confess that there have been some “hiccups” over the years. Without going into all the corporate planning detail—which is purely of local operational interest—we have long recognized that there would need to be some critical intellectual adjustment. The original macro-appraisal thesis would need necessarily some fine-tuning as we gained experience of its application; that was always our collective intention. The NA was not so naive as to believe that any strategy it proposed to bring intellectual rigor to what was previously a largely ill

defined and often esoteric records assessment process would not need testing, evaluation, and appropriate reconfiguration.

When the NA first launched its macro-appraisal strategy, however, we did not necessarily appreciate the full extent of what we would learn during our initial experiences with implementation, i.e., all of the subtleties and nuances associated with a strategic approach to appraisal based on an analysis of the archival value of government's business functions rather than on the archival value of its records. In addition, because the new approach was supported by a completely new business framework in the form of planning and project management partnerships supported by conventions between the NA and its client institutions, we did not fully anticipate the procedural complications that would subsequently emerge as institutions "bought" increasingly into our program. To a certain extent, at least in reference to what the NA has initially achieved from its own perspective—making better and more informed appraisal decisions—we have "suffered" a bit from our own success. Generally speaking, government institutions have been highly receptive of our new approach because it is more businesslike in the sense of being well planned and organized, more specific of resource requirements and administrative procedure, and more directly supportive of institutional records disposition obligations under federal information management policy. The "downside" (if this is the right word) of this vigorous institutional participation in our appraisal program has been the constant need—on the part of the NA—to give preference to the mechanics of government's records disposition process over heritage memory goals.¹ For various reasons, we have been forced to concentrate more on the articulation of records disposition business process, rather than on the intellectual substance of making appraisal decisions—albeit armed with an original macro-appraisal hypothesis that has had major salutary impact on the quality of our appraisal work (let there be no mistake on this point)—about the archival status of government's records. For a number of years, and longer than it originally anticipated, the NA has deferred the "recasting" of its macro-appraisal strategy.

Nevertheless, over the past year, the NA has corporately reviewed its macro-appraisal strategy and either validated its first conceptions and principles, "tightened down" some assumptions, or moved off in new or more refined directions. What follows below is an examination of the appraisal reforms initiated at the NA.² Some critical decisions have recently been made, and these will have substantial effects upon the way the NA makes appraisal choices.

For readers unfamiliar with the conceptual core of the NA's macro-appraisal tactics, and to provide some context for what follows, let me first offer a brief résumé of the NA's macro-appraisal thesis. Essentially, the NA does not believe that the value of information contained in records—however it is critically assessed, notably for its potential research value to historians (or to anyone else for that matter)—should form the primary basis for an intellectual rationale supporting archival preservation decisions. First, the NA believes that records evaluation assessments based on taxonomies of apprehended information value are both highly subjective and restrictive, insofar as they generally represent contemporary research interests, or "lobbies" of contemporary research interests (including archival lobbies), which do not sustain user utility or historical value over time from a heritage memory perspective. Second—and this re-

fers more directly to the practical aspects of making choices and assigning value—the sheer superabundant volume of the information currently being created, accumulated, and managed by the federal government effectively prohibits any logical approach to appraisal that begins with an assessment of records.

Consequently, rather than focusing on records and their potential meaning or interpretation, the NA has decided to provide Canadians with a comprehensive documentary *picture* of government—how it operates and makes decisions, how it delivers programs and services, how it administers the public business, and how it interacts with citizens and groups—by analysing and evaluating its business functions, processes, and activities. After decisions are made about the relative value of particular functions or processes or activities viewed globally across government and internally within institutions, archivists are required to select records created and managed by primary program and service providers that provide appropriate and sufficient archival evidence of the business context under review, including, if necessary, records of individual business transactions (case records). By studying government's business *functions*, by linking these functions to administrative *structures* (agencies and offices), and by relating this functional-structural *nexus* to corresponding record-keeping systems and records in order to make appraisal decisions, the NA intends to offer Canadians a *complete* recorded *illustration* of government's history over time and to provide a comprehensive documentary means of assessing, evaluating, understanding and interpreting what has transpired.³

This paper is based on the premise that “straight talk about appraisal reform”⁴ is required, rather than a discussion of the archival appraisal theories that have over the years been devised to identify the constitution and meaning of documentary historical heritage. After all, these theories largely represent, as John Roberts once phrased it, “much ado about shelving.”⁵ Being more practical, we know intuitively that there are many more nontheoretical objectives afoot when we, the archivists and records administrators, set about records disposition business. Things like economy of scale, resource allocation, and cost benefit, the implications of information law, and the context of public accountability in a democratic society must all be taken into account. Underneath the puffed-up bravado of archival science and the vocational discourse associated with establishing educational curricula and professional credentials are the legislated responsibilities associated with the day-to-day operations of dealing with the possession and control of the records of the state for the benefit and use of citizens. These are the very weighty matters of import—the collective cold, hard, archival reality. At least, this is the current theory of antitheory. I will come back to this point later.

Therefore, this essay does not focus on the formulation of appraisal theory, but rather addresses records disposition problems in the “real world,” in the archival “trenches,” if you will. At the National Archives of Canada, my job is to develop the corporate strategy for the appraisal and disposition of the records of the Government of Canada. Aha! You say that there is a vast difference between appraisal strategy and appraisal theory and, to a certain extent, I would agree. So I am going to talk about appraisal strategy, or what essentially amounts to *documentation planning*.

The National Archives first got serious about reforming its government records disposition business in 1989–1990. Notably, appraisal reform was neither initiated nor

motivated by grand archival theory. There was no sudden discovery of a conceptual blueprint for appraisal decision making that would both entirely satisfy our corporate obligations and responsibilities and the needs of our users drawn from the broader perspectives of documentary historical heritage and access to information. When the National Archivist approved the planned approach to government records disposition in 1991, he was most definitely not struck down and blinded by archival theory revelation.

On the contrary, he had new archival legislation and other information law to address. He was also dealing with a number of internal and external factors, which encouraged the NA to take a long and hard look at what it was doing. This examination was conducted to achieve logical and sustainable appraisal outcomes towards the preservation of a comprehensive record of federal government activity susceptible both to intellectual scrutiny and legal audit. Six contemporary observations eventually motivated the NA to initiate appraisal reform, summarized as follows:

1. The government records holdings of the NA were expanding at an exponentially alarming rate. This would eventually be confirmed by an external audit in 1992.
2. The records being acquired by the NA were not representative of the complete operational agenda of extant government programs and services. They did not fully document policy and decision making at the upper echelons of government, and transactional records, notably case files, were overly subscribed in comparison with policy and program records.
3. Records Disposition Authorities issued under the National Archives of Canada Act were unevenly distributed among government institutions, often without regard to the significance or importance of the activities undertaken. Many were clearly out of date, and some were unenforceable.
4. Our relationship with government institutions was largely unfocused and unplanned. We relied heavily on our ability to generate goodwill and ad hoc cooperation, rather than on a business process that specified obligations and result orientation leading to mutual program efficiency.
5. New federal information laws, including the Access to Information Act and the Privacy Act in 1983, and the National Archives of Canada Act in 1987, had dramatically changed the operating environment of the National Archives. Among other things, these laws placed the National Archivist in control of records destruction by federal institutions. This had enormous consequences for the way we approached our appraisal evaluations and overall records disposition decision making, since government institutions could not dispose of any records without archival permission (previously, our appraisal intervention occurred at the end of the records disposal cycle, often after many records had already been destroyed).⁶
6. And last, but not least, the existing rationale for our appraisal decision making was flawed both from an intellectual and a legal audit perspective. It was highly subjective, largely conducted according to a hodgepodge of accumulated wisdom and experience about the potential historical research value of records, which was manifestly not susceptible to any conceivable standards of empirical analysis. It was also being conducted within an organization of subject specialist "stove-

pipes” or program portfolios, without any overarching organizational appreciation for the global environment of government record creating and record keeping.

The NA faced many serious issues and challenges. We tackled them through macro-appraisal. In other words, the NA strategy of macro-appraisal was largely an operational response to a set of practical problems. However, it is important to recognize that macro-appraisal also represents our best conceptual effort to resolve practical issues around the preservation of government’s memory while maintaining a high standard of intellectual integrity in relation to the formulation of appraisal decisions. A particular set of problems invoked a strategic response. This response was supported by theory and methodology in order to sustain an intellectual standard of records disposition decision making, which would address academic-historical, legal, and other public information concerns.

Nine years into macro-appraisal implementation, the NA government records disposition program requires some significant adjustment, and we are moving towards yet more rigorous appraisal decision making. We will be taking a harder line, a tougher appraisal stance, if you will. Does this mean that macro-appraisal has failed?

On the contrary, if we look back over its corporate track record, the business efficiency and product output of the current program completely outstrip anything cumulatively achieved by the NA regarding government records disposition over the 20 years prior to 1991. There has been a remarkable transformation of organizational culture in terms of business process. The intellectual standards of our appraisal decision making have also improved significantly. Our program is widely regarded in the international archival community as a model to be emulated.

However, some of this success must be qualified, and there have been growing concerns inside the NA about the status of the program in reference to several anticipated goals and objectives. These include the capacity to have: 1) full coverage of the records of government, and 2) a fully implemented macro-appraisal strategy for government records based on functional analysis that ultimately determines the nature and extent of our archival records acquisition activities. We have learned a great deal over the past nine years that we would like to integrate into macro-appraisal for the purpose of realizing more refined and sustainable appraisal outcomes. Although some refinements are necessary, the original concept of macro-appraisal remains perfectly valid.

I have referred to the criterion of “sustainable appraisal outcome” several times, with reason. Let’s be honest here: the key is “sustainable.” The Canadian Government is currently adopting “accrual accounting.” This financial system clearly asks how much federal archival memory the NA will be able to acquire and sustain based on budget. The economies of appraisal, the value of records in the context of resource commitment, and its impact on the decision to acquire have never been popular subjects of discussion at the NA. Nevertheless, we have to face reality. To this end, we recently conducted a review of the costs associated with the analysis, appraisal, and acquisition of a large electronic database, and we have also launched a major project to develop and incorporate a cost-of-acquisition module into our appraisal reporting process.

There are other pressing issues at hand. We are now looking at our program from two different viewpoints: 1) macro-appraisal’s role in the identification and acquisi-

tion of government records that have archival value, and 2) a comparison of the program's goals and objectives to the extent of the actual coverage provided by archival authorities. In reconciling these viewpoints we have discovered that there is significant convergence of opinion on a number of fronts. These include:

- The continued acceleration of government records acquisition and the need to control the rate of acquisition by engaging more rigorous records disposition decision making. We may be acquiring too many records of marginal or lesser archival value viewed comparatively against records yet to be appraised and/or value measured both within the context of our macro-appraisal initiative and our current resource capacity.
- The absence of fully implemented functional analysis and macro-appraisal and, in particular, the absence of a correlation between our strategic appraisal and acquisition planning initiatives and our actual appraisal outcomes.
- The incapacity of many government institutions—despite “buy-in”—to develop records disposition submissions that meet the goals and objectives of a strategically planned appraisal and records disposition program.
- The uneven and relatively slow rate of program progress across government institutions viewed collectively. We have been highly successful with a number of major agencies, but have made little progress with others.
- The linking of disposition primarily to project management time tabling and business enterprise, and secondarily to strategic appraisal planning from an intellectual perspective, i.e., what the NA should be preserving as historical perspective upon government's corporate memory.

Our overall impression of the current state of the program is that our macro-appraisal strategy has reached the limit of its capacity in its present form. Without significant elaboration, it will shortly begin to adversely affect our ability to make informed and sustainable appraisal decisions. For one thing, there is an absence of consensus amongst staff regarding decision making once the methodological framework of macro-appraisal is applied. In some instances, the recommendations in our appraisal reports continue to reflect traditional forms of archival analysis despite every good intention to implement the macro approach. One of the biggest problems we have encountered in this regard is the incapacity of some institutions to implement our archival requirements because their record-keeping systems do not lend themselves to functional analysis and functional transfer specifications.⁷

This is not so surprising. NA macro-appraisal is, after all, primarily a methodology of analysis and identification rather than a theory of evaluation. In its present form, it is designed to identify and situate entities, functions, programs, or services in the context of their organizational framework rather than to determine their value in relation to the records that are created and kept in their support. This methodology was more or less adequate in the context of government's upper policy and decision-making echelons, where the records are *de facto* assumed to have significant archival value owing to their administrative provenance. However, as the program has engaged government's line operation and service delivery platforms, the methodology needs to address archi-

val value in the context of national significance viewed from a macro perspective. The necessity of refining macro-appraisal by creating a Documentation Plan supported by acquisition criteria was anticipated from the very outset, but the external pressure to deliver disposition products to agencies delayed the development of detailed acquisition strategy decisions. The program now requires greater hypothetical focus leading to institutional positions and statements on the archival value of records viewed from a macro-functional perspective linked directly to our institutional mandate as defined in legislation.

To address these concerns outlined above, the NA has recently completed a review and revision of its *Appraisal Methodology*.⁸ One of the main features of this revision concerns the limitation of archival acquisition and preservation activity exclusively to Offices of Primary Interest (OPI), both at the broader level of government policy domains and inside individual institutions. An Office of Primary Interest is an administrative entity within government that has *exclusive* responsibility for formulating programs and/or delivering services in reference to legislation and mandate. The National Archives has adopted the position that the best and most comprehensive documents of government business activity reside necessarily in the record-keeping system of the agencies and bureaus primarily accountable for delivering services and programs. Consequently, it will not acquire records from institutions implicated in program and service delivery through their participation in broad business processes, i.e., from institutions without an accountability mandate under law or policy.

Further, *Appraisal Methodology* now calls for a determination of *sufficient evidence* in each case, requiring archivists to judge—based on the value of the business function(s) under examination in comparison with others—which and how many records need to be acquired. To assist this determination, *Appraisal Methodology* now includes guidelines for archivists to follow as they assess the value of business functions linked to administrative entities. In addition, the methodology also provides documentation goals supporting a Documentation Plan. By Documentation Plan, I mean a set of macro-appraisal criteria establishing a typology of general functional values and other considerations priority linked to the significance of government's business policy and operational domains. In support of this Documentation Plan, the NA is also undertaking a macro-analysis of federal business functions and processes towards the creation of an (adjustable) appraisal blueprint for federal programs and services. This blueprint will be adapted for use in our Records Disposition and Authority Control System (RDACS) to provide archivists with a global view of the functional and administrative machinery of government. We have also begun to prepare a report on the application of informational value within the context of NA macro-appraisal. Macro-appraisal and informational value are not incompatible concepts, and the NA continues to acquire records for the value of the information they contain in certain, very narrowly defined circumstances. However, the capacity of the NA to maintain and accumulate over time vast holdings of case and instance records is limited. Included in this endeavor are the development of a case file acquisition strategy, and perhaps most significant, a data acquisition strategy.

Another new macro-strategic direction that is likely to have a major impact upon our appraisal program is our intention to make greater use of multi-institutional disposi-

tion authorities. Traditionally, like many other archives, the NA has used multi-institutional applications to provide for the appraisal and disposal of common administrative records. In the future, as far as possible, we are proposing to use multi-institutional applications for policy and operational records by analysing and appraising large business domains across government. For example, we are currently preparing an appraisal of government's Security and Intelligence Function, which intersects the responsibilities and accountabilities of at least 14 agencies. The goal is to issue one records disposition authority to all of these agencies indicating archival requirements, thereby eliminating the necessity of dealing with these agencies on an institution-specific basis.

These are just some of the new macro-appraisal initiatives being implemented to bring our government records disposition program to full and satisfactory fruition. Basically, we need to gain greater control of the records disposition process by more forcefully implementing and appropriately resourcing our records disposition strategy towards achieving heritage memory goals.

Conclusion

In conclusion, I thought about what I would say to an archival institution preparing to reengineer its appraisal process. Fundamental to this process is a broad research agenda devoted to the analysis of government functionality and business process linked to a Documentation Plan specifying a detailed records acquisition agenda. From the beginning, we knew that this research would be critical to the success of the program once the obvious records of preeminent archival value had been considered. Unfortunately, resources being limited and the pressure to meet immediate needs being heavy, this research agenda gradually "faded" from operational priority.

So now we find ourselves in the position of having to reinvigorate our research agenda to address disposition decisions concerning the value of records, which our very efficient appraisal business process constantly demands of us. I cannot say that we made a "bad" decision by deferring concentrated appraisal research since our circumstances required another course of action. On the other hand, I would say that the act of appraisal—the process of deciding what survives as recorded documentary heritage in an archives—must be supported by a high level of intellectual integrity susceptible to community scrutiny. To me, this is represented by a Documentation Plan invested with an appraisal hypothesis and repeatedly proven by research and analysis. At some point in the appraisal enterprise, there must be a statement of intellectual intent and objective, and a pool of knowledge accumulated in its support. Yes, Mr. Roberts, contrary to certain archival opinion, there is very "much to do about shelving," and to this end the National Archives of Canada is articulating its own local domain of records preservation objectives and archival-historical understanding.

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NOTES

1. In particular, government agencies have typically required very precisely written terms and conditions for archival agreements of transfer, and frequently provided them to legal counsel for scrutiny and review. It is gratifying to see agencies taking the process seriously, but the technicalities involved in drafting these agreements have been a constant source of adjustment and delay. Currently, the NA is drafting a new model agreement with generic terms and conditions for government-wide use through the Department of Justice.
2. This article is based on a paper I delivered at the annual meeting of the National Association of Government Archivists and Records Administrators (NAGARA) in 1999, supplemented by a perspective on the current strategic directions of the NA records disposition program.
3. There is now an extensive archival literature on macro-appraisal theory written by NA program staff. See Richard Brown, "Macro-Appraisal Theory and the Context of the Public Records Creator," *Archivaria* 40 (1995): 121–172; "Records Acquisition Strategy and Its Theoretical Foundation: The Case for a Concept of Archival Hermeneutics," *Archivaria* 33 (1991–92): 34–56; "The Value of 'Narrativity' in the Appraisal of Historical Documents: Foundation for a Theory of Archival Hermeneutics," *Archivaria* 32 (1991): 152–156; Terry Cook, *The Archival Appraisal of Records Containing Personal Information: A RAMP Study with Guidelines* (Paris: ICA, 1991); "Documentation Strategy," *Archivaria* 34 (1992): 181–190; "Macroappraisal and Functional Analysis: Appraisal Theory, Strategy and Methodology for Archivists," *L'évaluation des archives: des nécessités de la gestion aux exigences du témoignage* (Montréal: Groupe interdisciplinaire de recherche en archivistique, 1998): 27–33; "Many are called but few are chosen: Appraisal Guidelines for Sampling and Selecting Case Files," *Archivaria* 32 (1991): 25–50; "Mind Over Matter: Towards a New Theory of Archival Appraisal," in Barbara Craig, ed., *The Archival Imagination: Essays in Honour of Hugh Taylor* (Ottawa, 1992): 38–70; Jean-Stéphane Piché, "Doing What's Possible With What We've Got: Using the World Wide Web to Integrate Archival Functions," *American Archivist* 61:1 (1998): 106–23.
4. The NAGARA session was actually called, "Straight Talk about Appraisal Reform," and my presentation was called, "Back to the Strategic Roots: Appraisal Reform at the National Archives of Canada," hence the title of this essay. The other panelists were Michael Miller of the National Archives and Records Administration and Scott Leonard of the State Archives of Michigan. The moderator was Alan Kolowitz, then at the New York State Archives and Records Administration.
5. John Roberts, "Archival Theory: Much Ado About Shelving," *American Archivist* 50:1 (1987). See also "Practice Makes Perfect, Theory Makes Theorists," *Archivaria* 37 (1994): 111–121.
6. It is important to note that the National Archives of Canada operates in a particular legislative and policy environment. The NA is empowered to identify and preserve records with archival or historical importance. To this end, the National Archives of Canada Act (1987) permits the Archivist to intervene in government's records disposition business process by obliging federal agencies to seek archival permission to dispose of records, thus affording the NA an opportunity to make archival appraisal choices prior to any other disposition decisions made by government institutions. However, the Archivist does not have the authority to approve retention schedules prepared by institutions. Under the

federal Management of Government Information Holdings Policy (1989), the scheduling of records is exclusively the responsibility of institutions conducted within the context of business needs analysis. This is why the National Archives typically engages its appraisal business in reference to the granting of Records Disposition Authorities, rather than in reference to the approval of records retention schedules.

7. From the beginning, NA program staff have embraced macro-appraisal strategy. However, they have also noted anomalies in and difficulties with its practical application or implementation. In fact, many of the reforms now being introduced by the NA have emerged from the findings and experiences of its staff. Some of the issues involved are explained in published case and broader methodological studies as follows: Catherine Bailey, "From the Top Down: The Practice of Macro-Appraisal," *Archivaria* 43 (1997): 89–128; Jean-Stéphane Piché and Sheila Powell, "Counting Archives In: The Appraisal of the 1991 Census of Canada," *Archivaria* 45 (1998): 27–43; Jean-Stéphane Piché, "Macro-Appraisal and the Duplication of Information: Federal Real Property Management Records," *Archivaria* 39 (1995): 39–50; Brian Beaten, "Macro-Appraisal: From Theory to Practice," *Archivaria* 48 (1999): 154–198; Sheila Powell, "Archival Reappraisal: The Immigration Case Files," *Archivaria* 33 (1991–92): 104–116; Ellen Steinberg, "Case File Theory: Does it Work in Practice?," *Archivaria* 38 (1994): 45–60; Candace Loewen, "From Human Neglect to Planetary Survival: New Approaches to the Appraisal of Environmental Records," *Archivaria* 33 (1991–92): 87–103; Dan Moore, "Too Many Records, Too Little Time, Too Few Resources: The Need for a Research Based Planned Approach to the Acquisition of Government Records," *La Mission de l'Archiviste dans la société* (Montréal 1994); Eldon Frost, "A Weak Link in the Chain: Records Scheduling as a Source of Archival Acquisition," *Archivaria* 33 (1991–92): 78–86.
8. Government Records Branch, National Archives of Canada, *Appraisal Methodology: Macro-Appraisal and Functional Analysis, Part A (Theory and Concepts), Part B (Guidelines for Performing an Archival Appraisal of Government Records)*, prepared by Terry Cook (summer 2000), reviewed and edited by Richard Brown and Judith Roberts Moore. See also its companion, Government Records Branch, National Archives of Canada, *Drafting an Appraisal Report for the Disposition of Government Records*, prepared by Richard Brown, with Yvette Hackett on the Technical Evaluation of Electronic Records (September 2000).