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Lessons Learned and to be Learned in Intergovernmental Appraisal

Kathy Roe Coker

Seneca, Roman politician, poet, and essayist, succinctly echoed the Roman view of cooperation, efficiency, and practicality when he wrote "one hand washes the other."\(^1\) Centuries later archivists are still struggling to learn and apply Seneca's maxim. Although archivists have not successfully implemented Seneca's maxim in the realm of cooperative appraisal, they have for some time recognized the need.

\(^1\) Quoted in George Mariz, "Multiple Use of a Survey: Training, Guides, Records Management, and Beyond," *American Archivist* 42 (July 1979): 301.
In July 1977 the Commission on Federal Paperwork published its report on *Federal/State/Local Cooperation.* The commission selected a number of areas which, in its view, "delineate[d] the systematic issues that are the root cause of red tape and paperwork within the intergovernmental system." Among them was the "concurrent jurisdiction" at the federal and state level "over the lives of citizens." Two of the commission’s thirty-four major findings are germane to the archival profession. The commission recommended that agencies "engaged in information collection should establish a procedure to identify the potential for satisfying both Federal and State information requirements through contracts or cooperative agreements executed individually with the States." and that state and local officials should assure that information collection and dissemination practices are developed to meet the needs of Federal, State, and Local government." While archivists may or may not agree with the mechanics of the commission’s recommendations, they can appreciate the commission’s call for intergovernmental cooperation in the area of information management.

In the archival profession, there has been a similar call for cooperation and, at the same time, a recognition of the obstacles to that cooperation. This was especially apparent in the 1983 state assessment report made to the National Historic Preservation and Records Commission (NHPRC) by the grantees. In his report on state government records programs, Ed Bridges wrote that the "cohesion required for an effective overall public records program becomes virtually unobtainable" when records management is separated from archives. While he was commenting on a specific debate, the underlying message is clear. He called for cooperative attempts to improve archival conditions nationally. Bridges

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depicted conditions of state archives as "a small, haggard band of defenders surrounded by forces that threaten to overwhelm them and desperately struggling to survive."3 Addressing statewide functions and services, Margaret Child concluded: "Unfortunately, one of the overriding impressions left by these reports [the state assessments] is that each state is bound and determined not only to go it alone but to reinvent the wheel wherever and whenever possible."4 On the local government records level, Richard Cox wrote that one of the main reasons given for the neglect of local records was the "poor relationship between state archival institutions and the local governments."5 Inherent in all these reports is the cry for more cooperation between state and local governments in handling the abundance of documentation created by society.

The bounteous documentation is further multiplied by its redundancy—redundancy stemming from, among other causes, this age of xerography, computer technology, and the overlapping and interrelated functions of government at the federal, state, and local levels. One characteristic of modern government records is their repetitiveness. A local government's records may be duplicated by a state agency's records. Several state agencies involved in a particular program may have copies of the same documents in their files. This occurred in South Carolina, for example, with the American Revolution Bicentennial Commission which involved at least the state archives and the Department of Parks, Recreation, and Tourism. Because the state and local government

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participate in federal programs, duplication exists, too, in federal agency records. The problem only grows in magnitude when it is considered that states and local governments share in the same federal programs. This ever-multiplying mushroom of repetitive documentation requires pruning. Cooperative or intergovernmental appraisal can be an effective tool in pruning the ever-growing, repetitive documentation.

Intergovernmental appraisal requires the integration of records appraisal at the federal, state, and local levels. It is a comprehensive approach to determining the values of records which, like the flow of information, transcends governmental divisions and barriers. Records are not created in a vacuum nor should records appraisal be performed in one. The concept is not as novel as is its implementation. Schellenberg urged in *Modern Archives* that, "government records that contain information on a particular phenomenon should be appraised in relation to all other documentation on that phenomenon. . . ." He believed that "federal archivist[s] should consider whether the same or similar information is available in other forms or places. . . . The records universe," he added "is not limited to the physical records of the generating agency but includes any source or agency that contains the data."6 The "records universe" is not limited by divisions between seats or echelons of government, nor need or should archivists limit their appraisal strategy to the particular generating agency or its place within the federal, state, or local hierarchy. The proliferation of modern records accompanied by the decrease in resources makes such an approach impractical. Not only is it impractical, but it also runs the risk of preserving duplicate information while fostering ignorance about gaps in documentation. In order

to achieve balanced documentation, archivists must apply an intergovernmental appraisal strategy to federal, state, and local records.

Equally important and, indeed, essential to this strategy, is the lateral and vertical integration of records management and records appraisal programs. These two interdependent functions need to interact at the state or local level respectively and across or between governmental divisions. A program lacking such communication is in many cases alien to the very flow of information and documentation. While not always the case, the state may formulate a policy independently or under federal direction while implementation often occurs at the local level. Documentation of the given program exists at all three levels. An integrated, intergovernmental appraisal strategy discerns the different levels of documentation making it possible to judge the values of the records, and at which level or levels balanced documentation can best be achieved.

Intergovernmental appraisal is facilitated at the South Carolina Department of Archives and History by the department's comprehensive and integrated approach to records management and records appraisal. The state and local records management programs are currently under the direction of one of the department's five assistant directors. Until recently the records appraisal function was directed by the deputy director and the appraisal archivist. This function, along with personnel, has been transferred to the assistant director for state and local records management. Under both the old and new administrative organization, when appraising local records schedules the archivist has the advantage of the state records appraisal perspective from which to analyze local records schedules. One case in point concerned seventeen records schedules for Cheraw County's police department. The department had a considerable backlog of incident reports. These were original reports of felonies or incidents and the pertinent facts surrounding the offenses. In South Carolina local police departments are
required to file crime reports with the State Law Enforce­ment Division (SLED). SLED operates the comprehensive Uniform Crime Reporting System. From this system SLED produces thorough statistical reports. At the state level these reports were scheduled for permanent retention. The county's incident reports and criminal profile were consid­ered to be documented adequately and, therefore, scheduled for destruction when no longer of legal or administrative use to the county. This same rationale was employed in justifying the destruction of the county's Booking Report, Case Number Log, Case Files, Arrest Cards, and Criminal History File. Similarly, the state highway department maintains and reports statewide accident data in a published format. This warranted the destruction of the county's accident reports.

In a case involving Charleston County School District's implementation of the United States Department of Agricul­ture's child nutrition programs, no adequate financial summary of the county program on the state level was found. Documentation did exist, however, on the state level of policy and procedures governing the program and coordination between the state department of agriculture and the county school district. To obtain balanced documenta­tion the county fiscal record was scheduled for permanent retention and the duplicated county administrative files for destruction.

A far more complicated and time consuming appraisal project concerned 612 cubic feet of paper records and 878 reels of microfilmed records of the Department of Social Services. The noncontinuing record series, Client Information Summary Sheet (CIS) Verification Files, spanned the dates from 1937 to 1980. The series documented client information for eligibility and authorization for issuance of public assistance awards. More specifically, the records--at least the paper records--are part of the Client Information Summary System implemented in 1976 as a method of maintaining and controlling data associated with assistance
payments. It is a quality control effort intended to detect fraud cases among recipients. The CIS files, however, are distinct from the case files which are in the county offices and separately scheduled.

The files include diverse forms and certain demographic, programmatic, and financial characteristics of the recipients. At first it was believed the records would be of value in documenting the public assistance program and its recipients from its early beginnings following passage of the Social Security Act in 1935 to the more recent past. That view began to change as the appraisal project continued. One problem was that much of the information was coded. The extent of the coding increased as the records became more recent. The paper records were heavily coded when compared to the microfilmed records (1936–1976). The earlier microfilmed records (1930s) included some narrative comments made by caseworkers. By the 1970s, the form was completely coded. No key to the code accompanied any of the records. The search for a key turned up only a current one. It was useless in trying to reconstruct the obviously frequently updated key.

To determine whether or not the information was documented sufficiently elsewhere, another search encompassing both federal and state records and resources was conducted. Two federal studies (March 1977 and March 1979) and a 1979 state study were found to provide programmatic, financial, and demographic statistical information on South Carolina's program. This was coupled with information on the public assistance programs available in the agency's annual reports and the agency's monthly statistical reports scheduled for permanent retention. The monthly reports date from 1938. Also uncovered was a more recent yearly state report, the Recipient Characteristics Study–Income Maintenance report, which promptly was scheduled for permanent retention.
As another part of the comprehensive appraisal strategy, letters were sent to ten other state archives or historical societies who were identified as having appraised or had plans to appraise similar public welfare client sheets and/or case files. Replies were received from seven. The replies, especially from the New York State Archives and from the Wisconsin Historical Society, reinforced the initial appraisal decision concerning the value of the earlier records and the increasing doubt over the need to retain the later records. None of the respondents accessioned the client information sheets.

In the end, this intergovernmental and interinstitutional appraisal strategy convinced the appraisal archivist to recommend that the paper client information sheets be destroyed, that the earlier microfilmed records be retained for the 1930s and 1940s, and that another review be made of the county case files for the purpose of determining whether or not at least the earlier case files should be retained.

Other examples could be cited exemplifying the attempts in intergovernmental appraisal, efforts especially on the state records appraisal level which involved searching through available National Archives and Records Administration (NARA) guides, inventories, and other finding aids, and contacting NARA officials. Appraisals at this level are not as easily accomplished as those at the state and local levels. In one case, while State Forestry Commission records were being appraised, it was discovered that aerial photographs taken by the then Soil Conservation Service in the 1930s were duplicated at NARA but on silver nitrate film. Because the film had not been converted to safety film yet and for ease of reference, the decision was made to retain the agency's copies. In other cases, searches were made in vain to find evidence that state or local records were documented on the federal level, but it was not always possible to be certain that all resources had been exhausted.
That uncertainty has no doubt plagued others and is a definite obstacle to intergovernmental appraisal. To make intergovernmental appraisal successful, a change is required in the "go it alone," reinvent-the-wheel mindset. Archivists get so involved in their own institutional appraisals that they often do not see beyond those institutional walls. That mindset itself is antagonistic to the very concept of intergovernmental appraisal. Archivists must break those mental barriers before they can truly communicate and cooperate with each other vertically and laterally across governmental divisions.

One aspect of that cooperation is the sharing of appraisal experiences and decisions which will help in identifying duplicate information as well as gaps in documentation. The Midwestern Archivist and the American Archivist have begun publishing case studies sections, which is a beginning.

Often, however, it is difficult to obtain access to archival literature needed during an appraisal project. There have been some attempts to prepare bibliographies on appraisal and other topics, such as Julia Marks Young's "Annotated Bibliography on Appraisal." But, these are not long-term, ongoing efforts. As Malvina Bechor found in her study "Bibliographic Access to Archival Literature," the systematic creation of effective finding aids is not keeping pace with the increasing number of literary products.

One possible solution to the problems involved in information exchange is a recommendation made by Victoria Walch in a National Association of Government Archives and Records Administrators's (NAGARA) study, Information Resources for Archivists and Records Administrators: A Report and Recommendations. She suggested the creation of an archives and records information center (clearinghouse),

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the designation of the NARA library as the official depository for printed archival and records related material, and the development of NARA’s bibliographic data base.\textsuperscript{9} At a June 1987 follow-up meeting to Walch’s report, NARA expressed its desire to transform its library into a centralized national depository for material on archives and records administration.\textsuperscript{10}

Such a depository and its bibliographic data base should encompass the trans-border flow of data. Archivists in this country need access not only to the work and literature of their American counterparts but also to that of other archivists and information personnel around the world. This will be a challenge. While the United Nations Educational Scientific and Cultural Organization (UNESCO) has published bibliographies on archival matters,\textsuperscript{11} much remains to be done in the international transfer of information and in breaking what one academic librarian has called the "stalemate on international information policy,"\textsuperscript{12} which was perhaps only aggravated by the United States’s withdrawal from UNESCO. While the technology is available to transcend geographic barriers, archivists and other information managers must be knowledgeable of that technology and be willing to use it.


\textsuperscript{10} National Historical Publications and Records Commission, "Report and Conference on Archives and Records Information Exchange," \textit{Annotation} 15 (October 1987): 3.

\textsuperscript{11} See, for example, Frank B. Evans, \textit{Writings on Archives Published by and with the assistance of UNESCO: A RAMP Study} (Paris: UNESCO, 1983).

A clearinghouse and publication of case studies in journals will help in improving access to printed material, but there is still the problem of sharing information on institutional holdings and the unprinted data on appraisal projects and decisions. For instance, it is at times difficult to discern exactly what the National Archives retains among its holdings on a particular program, which interferes with effective intergovernmental appraisal. To help archivists in wading through what sometimes seems to be a maze of bureaucracy and records, perhaps a liaison office or officer could be established within, for example, the Office of Records Administration (ORA) similar to the liaison officer NARA provides to federal historical offices. The Records Administration Information Center (RAIC), a records management information clearinghouse, opened by the ORA in January 1986 is certainly a step in the right direction.

Archivists need more cooperative efforts along these lines. One cooperative project which already promises to be of assistance in realizing intergovernmental appraisal is the Research Libraries Information Network (RLIN). Sharing of appraisal information across state lines is one of the project's goals. That information should also be shared laterally and vertically along state and local government records management and appraisal lines.

In May 1987 the author sent a questionnaire to the seven RLIN participants. Replies were received from three institutions. Those replies indicate that local and municipal government records schedules are not being entered yet into the data base. When asked how the institution would rate the usefulness of the data base in appraising records, one replied highly useful, another moderately useful, and the third said, "Except for studying what other states are...

considering entering as appraisal data, . . . [it had] not regularly used appraisal information."\textsuperscript{15} When asked whether RLIN had helped in the identification of duplicated record series and information at the state and local levels, all three responded no. One attributed this to the "small size of the data base and the novelty of the project. . . ." The respondent added, "We envision the eventual need and usefulness of this type of comparison."\textsuperscript{16} The need and usefulness for this comparison is long overdue.

On the individual state level, state archives should take the lead with local government assistance in establishing, implementing, and disseminating a statewide collection management policy for local government records. Many states, such as South Carolina, have done so. The policy should be flexible enough to recognize and meet distinctive needs between local governments.

In addition, improved lines of communication are needed between the state archives and local government officials to improve their poor and often strained relationship. As Victoria Walch points out in her NAGARA study, professional archivists and local government officials "have been the most vocal in calling for improved information exchange mechanisms."\textsuperscript{17} State archivists should have learned from the days of centralized local records retention at the state archives of the need for and rewards of a cooperative approach or strategy.

The state and local records management and appraisal programs need to be more integrated, thereby enhancing communication and cooperation between archivists and records managers. The state archives could work with the state library to achieve better bibliographic control over

\textsuperscript{15} Minnesota Historical Society, St. Paul, Minnesota, 18 June 1987.

\textsuperscript{16} Alabama Department of Archives and History.

\textsuperscript{17} Walch, Information Resources for Archivists and Records Administrators, 5.
printed and unprinted material which in turn could become part of regional and national data bases. But, as Margaret Child warned, archivists must not fall continued victims to tunnel vision and the "starting from scratch" mentality.\textsuperscript{18} That is, existing bibliographic networks, such as the Educational Resources Information Center (ERIC), may suit or be adapted to archival needs. Walch found that the Information Resources's clearinghouse acquisitions director is receptive to increased coverage of archival literature.\textsuperscript{19} As seen with ERIC and in the case of Machine Readable Cataloging (MARC) and the MARC–Archives and Manuscripts Cataloging (AMC) format, archivists can cooperate, learn, and share with and from other professions.

Cooperating with other information management professions, continuing and broadening the scope of ongoing projects like RLIN, establishing a clearinghouse on trans-border archival literature, sharing unpublished information on institutional holdings and appraisal information, improving communications between state and local governments, integration of records appraisal and records management programs, and sessions like the one on intergovernmental appraisal at the July 1987 NAGARA meeting are steps in the right direction. They are harbingers of the changing mindset from going it alone to cooperative strategies. Such strategies are essential if archivists are to realize the practical goal of intergovernmental appraisal.

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\textsuperscript{18} Child, "Cooperative Report: Statewide Functions And Services," 52.
\textsuperscript{19} Walch, \textit{Information Resources for Archivists and Records Administrators}, 10.