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Short Subjects: Archives and Records Management in the Federal Government: The Post-GSA Context

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On 19 October 1984, President Ronald Reagan signed the National Archives and Records Administration Act of 1984, separating the National Archives from the General Services Administration (GSA) and reestablishing the National Archives and Records Administration (NARA) as an independent agency. This legislation attempted to resolve the two long-standing dilemmas: the relationship of archives and records management in the federal government and the placement of the National Archives within GSA.

Several histories, notably those of H.G. Jones and Donald R. McCoy, document these issues and the efforts of the National Archives first to identify and preserve the early records of the nation and then to cope with huge numbers of newly created records and rapidly developing computer technology. Archivists recognized early that the combined paperwork and technological explosions would require new approaches to archives and records management. They began to think in terms of a records life cycle in which archivists managed documents from creation to final disposition, and they believed that the National Archives should play a leadership role in
determining the government's overall records policies.

However, as the small archives agency struggled in the late 1940s to cope with burgeoning records management demands, its ability to administer this task came into doubt. The immense cost of federal paperwork had become a dominant political issue. The need was for economy and efficiency and the mood was for centralization of services. In this climate, influenced by reports from the Leahy Task Force, the Budget Bureau, and the First Hoover Commission, the archives was, in 1949, placed within the newly created General Services Administration. While the National Archives and Records Service (NARS) held both archives and records management responsibilities within GSA, its leadership role and prestige as a cultural and educational institution seemed threatened. There was also concern that GSA's political atmosphere and the priorities of economy and efficiency might adversely affect archival activities.

Time seemed to bear out many of those concerns. In 1977 the final report of the Federal Paperwork Commission included strong criticisms of federal records management and called for major conceptual and organizational changes. It proposed a change from traditional records management, "which focuses on physical documents and their design, handling, processing and storage," to information resources management, "which more broadly focuses on the contents of documents and information and the value and treatment of information as a resource." In later hearings, allegations of mismanagement were aimed at both NARS and GSA leadership. Dramatic media charges of preservation and lax security at the archives and lingering litigation over ownership of the Richard Nixon and Henry Kissinger records added to an increasingly tense climate.

GSA officials, anticipating NARS's separation, sought to move major records management functions from the archives to GSA. This was effectively accomplished in January 1982 when GSA Administrator
Gerald Carmen transferred the NARS's Office of Records and Information Management to GSA's Automated Data and Telecommunication Service. The reorganization order also proposed a plan for a documentation unit within the archives and initiated an internal working group to identify those records management functions directly tied to archival concerns.

The National Archives and Records Administration Act of 1984 basically formalized the 1982 internal reorganization at GSA. Archives and archival functions are again independent; however, records management responsibilities are shared between the two agencies. The archivist of the United States is to "provide guidance and assistance to Federal agencies with respect to ensuring adequate and proper documentation of the policies and transactions of the Federal Government and ensuring proper records disposition." The GSA administrator is to "provide guidance and assistance to Federal agencies to ensure economical and effective records management by such agencies." The archivist and the administrator share responsibility for promulgating standards and procedures, conducting research, collecting and disseminating information, conducting inspections of agency records, and reporting to oversight and appropriations committees. Records restricted by law or for reasons of national security or the public interest are to be inspected in accordance with regulations promulgated by the administrator and archivist, subject to the approval of the head of the agency concerned or of the president. The legislation also attempts to insulate the archivist from partisan politics by providing for appointment solely on the basis of professional qualifications without regard to political affiliations.

To the end of committing their agencies to the cooperation mandated by the law, outgoing GSA Acting Administrator Ray Kline and outgoing Archivist Robert M. Warner signed a "Memorandum of Understanding." This document pledges cooperation through "frequent meetings to maintain mutual understanding of program
goals and objectives" and "coordination of regulations and guidelines through review in advance of publication for Federal agencies' comments or use, for purposes of policy consistency and procedural economy."

Staff members at both GSA and NARA continue to work out details of separation. This has been a tumultuous year for both agencies, but the prevailing mood seems to be one of optimism for current projects and confidence that the division of records management responsibilities is a workable one. The agencies recently issued identical bulletins on electronic record keeping and are working closely on inspection of Social Security Administration records.

At GSA's Office of Information Resources Management a massive two-year effort to consolidate automatic data processing and records management functions culminated in the recent publication of a new Federal Information Resources Management Regulation. This regulation provides definitions and procedures for the records management elements now under GSA, including reports, forms, correspondence, directives, mail, micrographics, and filing systems.

At NARA, archivists seem resigned to loss of major records management functions but determined to reestablish the National Archives' reputation for solid archival work and innovative leadership. As a result of recommendations of the Documentation Standards Study Group, established by Acting Archivist Frank Burke last spring, the Documentations Standards Division of the Office of Records Administration has been reassigned to the Office of the Archivist for six months ending in January 1986. During this time the unit will develop long and short-term goals for the documentation program, examine progress of the past two years, and recommend future placement of the documentation function.

Patricia Aronsson, director of the Documentation Standards Staff, describes the unit's work as a proactive approach to archives. Observing that some
archivists feel it is not appropriate for archivists to be involved in records creation, Aronsson emphasized that the archivist's role in documentation will be to assist records creators, not dictate records creation. Her staff will endeavor to define adequacy of documentation as distinguished from both traditional records management and appraisal activities. In addition, they will discuss ways to ensure creation of high quality documentation and will consider the impact of automation, including determining at what point a lasting record should be created.

The importance of the adequacy of documentation role for the archives cannot be underestimated. NARA has emerged from GSA largely eviscerated of its records management responsibilities. Involvement in documentation gives archivists important authority at the earliest point of the records life cycle, in addition to their traditional role in appraisal and disposition.

There is concern, however, that the 1984 legislation does not give the archivist of the United States adequate authority to fulfill these roles. Provisions giving the archivist final authority to determine what documentary materials are records and permitting him access to agency materials to make such determinations were deleted from the legislation. Lacking this authority and still awaiting appointment of a new archivist of the United States, it would seem that NARA is operating bravely, but from a disadvantaged position. As one congressman remarked, "We will have to revisit this subject undoubtedly in the days ahead and try to resolve it...."

While those who support the administrative union of archives and records management wonder how well shared responsibility as prescribed by the law will work, archivists generally applaud the return of independence for the National Archives and are matter-of-fact in their acceptance of other provisions of the new law. It would seem that the old philosophical arguments between archivists and
records managers have been superceded by new concerns. The practical realities of the paperwork and technological explosions have resulted in a complex, yet pragmatic, sharing of responsibility for federal records. This cooperation, involving records creators, records managers, archivists and oversight committees, is not the simplest, cleanest approach. It is, perhaps, the only way a large, democratic republic can manage and protect its documentary history in the last quarter of the twentieth century.

Linda Vee Pruitt

NOTES


3 Donald R. McCoy, The National Archives, 223.


5 Frank Horton, "Will the Bureaucratic Mind-Set Change or Will It be Changed?" Records Management Quarterly XII (October 1978): 40.

6 U.S. Congress, House, National Archives and Records Service and Its Relationship to the General Services Administration, Hearing, before a subcommittee of the Committee on Government

7 "The National Archives: Recent News," SAA Newsletter (March 1982), 4-5.


10 Interview with John Gant, division director, Office of Information Resources Management, General Services Administration, 21 August 1985.

11 Ibid.

12 Interview with Thomas E. Brown, archivist, Documentation Standards Staff, National Archives and Records Administration, 21 August 1985.

13 Interview with Patricia Aronsson, director, Documentation Standards Staff, National Archives and Records Administration, 27 August 1985.


15 Ibid., Representative Kindness speaking against S. 905, H11411.